



# Technical Appendix 9.3: Private Water Supply Risk Assessment

## Balgray Wind Farm

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SLR Project No.: 405.065655.00001

7 April 2025

Revision: 01

## Revision Record

| Revision | Date         | Prepared By | Checked By | Authorised By |
|----------|--------------|-------------|------------|---------------|
| 01       | 7 April 2025 | KR          | BD         | BD            |



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## 1.0 Introduction

SLR Consulting Ltd (SLR) was commissioned by Fred. Olsen Renewables Ltd (the Applicant) to undertake a private water supply (PWS) risk assessment for the proposed Balgray Wind Farm (the Proposed Development).

This Technical Appendix considers the potential effects of the Proposed Development on the quality and quantity of water at private water supply (PWS) sources within the study area which comprises a buffer of 500m from the site boundary. To complete the assessment a conceptual site model is presented which uses a source-pathway-receptor linkage to assess the risk to each PWS. Where necessary mitigation, required to safeguard a water source, is proposed.

The location of the PWS sources is shown on **Figure 9.3.1** appended.

This Technical Appendix should be read in conjunction with **Chapter 9** of the EIA Report which contains a detailed description of the local hydrology and hydrogeology, flow mechanisms and hydraulic properties of the soils and geology, the embedded mitigation incorporated in the development design, and an assessment of impacts on groundwater and surface water flows and quality.

### 1.1 Survey Approach

Following consultation with the Dumfries and Galloway Council (DGC) data was received for PWS sources within the study area. This data was then augmented with Ordnance Survey mapping and aerial photography.

Additional properties, and potential water users, were also identified following a programme of site-specific field investigation that involved visiting the properties within the study area, enquiring about their water use and source, and mapping water abstraction locations. A standard reporting questionnaire was used to ensure consistency of data collected.

The location of water sources (boreholes, springs, surface abstractions) and holding tanks etc. were recorded using a handheld GPS. When residents were unavailable on the day that the survey was conducted, questionnaires were left at properties requesting details of their water source or PWS.

The field investigation was completed in March 2025 by the author of this report and the assessment has been reviewed by Brian Dunlop.

### 1.2 Assessment Methodology and Report Structure

As required by SEPA's guidance the assessment has been undertaken by suitably qualified and experienced specialists.

The assessment has been undertaken with reference to Scottish Environment Protection Agency (SEPA) guidance<sup>1</sup> which sets out SEPA's expectations for the assessment of impact of developments on groundwater abstractions, both public and private water supplies. This guidance applies to proposed infrastructure, both temporary and permanent and provided any temporary or permanent dewatering abstractions are unlikely to exceed 10 m<sup>3</sup>/day.

SEPA recommends adopting a phased approach to the assessment of risks to groundwater abstractions, with greater detail being required for higher risk sites or activities, and identify the steps given in **Table 1**.

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<sup>1</sup> SEPA (August 2024) Guidance on Assessing the Impacts of Development on Groundwater Abstractions



**Table 1: SEPA Methodology - Assessment Steps**

| Step | Description                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                       |
|------|-------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| 1    | <p><u>Identifying any Existing Groundwater Abstractions</u><br/>                     This covers both public and private water supply groundwater abstractions, both within and out with the site boundary. It is critical that it is the actual source of the abstraction, and not the property that it supplies, that is identified.</p> <p>The relevant buffer zones for groundwater abstractions for all proposed infrastructure, both temporary and permanent and provided expected dewatering rates do not exceed 10m<sup>3</sup>/day, are:</p> <p>a) 10m for all activities<br/>                     b) 100m radius of all subsurface activities less than 1m in depth;<br/>                     c) 250m of all subsurface activities deeper than 1m</p> <p>Details of each private water supply source will require confirmation, including a site walkover survey. If there are no groundwater abstractions within the buffer zones, SEPA will not provide comment on this topic in our planning response.</p> <p><b>If there are no groundwater abstractions within the buffer zones there is no need to assess further and progress to Step 2.</b></p> |
| 2    | <p><u>Qualitative Impact Assessment</u><br/>                     A conceptual site model (CSM) should be provided as part of the Environmental Statement. This should include interpretation of the hydrogeological setting, including the groundwater flow regime. This may be supported, as appropriate, by intrusive ground investigation, groundwater monitoring, or groundwater modelling.</p> <p>Qualitative assessment of the potential impacts to any groundwater abstractions identified within the relevant buffer zones is required. This should consider the expected extent, magnitude, likelihood, and duration, frequency, and reversibility of any potential impacts.</p> <p>The impact assessment should consider the impacts to each groundwater abstraction individually, including any potential cumulative effects if the groundwater abstraction is near multiple parts of the proposed development.</p> <p><b>If the potential impacts to groundwater abstractions are considered low or less then no further risk assessment (e.g. Step 3) is required.</b></p>                                                                           |
| 3    | <p><u>Detailed Quantitative Risk Assessment</u><br/>                     This would include characterisation of the ground conditions at both the relevant infrastructure location(s) and the groundwater abstraction(s), plus the pathway(s) in between if appropriate. This will require ground investigation, including groundwater level and quality monitoring and quantify the potential change(s) in groundwater levels or flow regime.</p>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                |

Using this approach and developing this to include surface water abstractions and to consider the distribution pipework from ground and surface water abstractions the criteria given in **Table 2** have been used to assess potential risk to each PWS source.

**Table 2: Private Water Supply Risk Assessment Criteria**

| PWS Risk                                                                | Criteria                                                                                                                                                                                                                                                  |
|-------------------------------------------------------------------------|-----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| PWS source considered potentially at risk from the Proposed Development | <ul style="list-style-type: none"> <li>PWS source is located within 10m of any element of the Proposed Development;</li> <li>spring fed or groundwater source is located within 100m of excavations less than 1m deep (such as access tracks);</li> </ul> |



| PWS Risk                                                                                                      | Criteria                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                    |
|---------------------------------------------------------------------------------------------------------------|-----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
|                                                                                                               | <ul style="list-style-type: none"> <li>• spring fed or groundwater source is located within 250m of excavations greater than 1m deep (such as borrow pits, turbine crane pads and other hardstanding areas); and / or</li> <li>• stream or surface water fed abstraction is located within the same surface water catchment and downstream of the Proposed Development.</li> </ul>                                                                                                                                                                                                                                                                                                                                          |
| PWS source is not considered at risk from the Proposed Development, but distribution pipework may be impacted | <ul style="list-style-type: none"> <li>• PWS source is located at least 10m away from any element of the Proposed Development;</li> <li>• spring fed or groundwater source is not located within 100m of excavations less than 1m deep (such as access tracks);</li> <li>• spring fed or groundwater source is not located within 250m of excavations greater than 1m deep (such as borrow pits, turbine crane pads and other hardstanding areas);</li> <li>• stream abstraction is not located within the same surface water catchment and / or upstream of the Proposed Development;</li> <li>• the distribution pipework between the PWS source and property may be crossed by the Proposed Development.</li> </ul>      |
| PWS source or pipework not considered to be at risk from the Proposed Development                             | <ul style="list-style-type: none"> <li>• PWS source is located at least 10m away from any element of the Proposed Development;</li> <li>• spring fed or groundwater source is not located within 100m of excavations less than 1m deep (such as access tracks);</li> <li>• spring fed or groundwater source is not located within 250m of excavations greater than 1m deep (such as borrow pits, turbine crane pads and other hardstanding areas);</li> <li>• stream abstraction is not located within the same surface water catchment and / or upstream of the Proposed Development;</li> <li>• the distribution pipework between the PWS source and property will not be crossed by the Proposed Development.</li> </ul> |

The results of the PWS survey and assessment are presented in Section 2 of this report in accordance with Step 1 of the SEPA guidance. If any PWS are considered to be at risk from the Proposed Development, a qualitative risk assessment has been completed and is presented within Section 3 of this report (Step 2 of the SEPA guidance).

Section 4 of this report gives detail of a potential water monitoring schedule and parameter list that could be used to monitor water quality at receptors that have a hydraulic linkage (e.g. flow pathway) to the Proposed Development. The monitoring frequency, parameter list and reporting programme would be subject to agreement with Dumfries and Galloway Council and the Scottish Environment Protection Agency (SEPA) should consent be granted, and it is anticipated would be secured by an appropriately worded pre-commencement planning condition.



## 2.0 Private Water Supply Risk Assessment (Step 1)

Table 2 presents information collected from the PWS field survey, returned questionnaires, data collected during the desk study and following consultation with DGC. If a source is assessed to be within the buffers specified in SEPA's guidance and have a hydraulic connection (e.g. there is a flow pathway) to the Proposed Development, a further qualitative risk assessment and necessary mitigation are given in Section 3.

The findings from **Table 3** are summarised as follows:

- one PWS source has been identified as potentially at risk from the Proposed Development (and is assessed further in Section 3);
- two PWS sources are not at risk from the Proposed Development; and
- one property is confirmed to be supplied by mains.

**Table 3: Private Water Supply Risk Assessment**

| PWS ID<br>(Figure 9.3.1) | Property Name                             | Data Source<br>and Source<br>Type | Location of PWS<br>Source and Distance<br>from the Proposed<br>Development | Details                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                             | PWS Risk<br>Assessment<br>(see Table 2)                                                                                       |
|--------------------------|-------------------------------------------|-----------------------------------|----------------------------------------------------------------------------|-----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|-------------------------------------------------------------------------------------------------------------------------------|
| PWS01                    | Hallhill Farm<br>Cottage<br>Hallhill Farm | DGC<br>Unknown                    | E 315201 / N 588100<br>Approximately 1.1km<br>west of turbine T3.          | <p>The residents were unavailable during the survey and no questionnaire has been returned at the time of reporting. DGC data suggests that the properties are supplied by a PWS source which is located approximately 300m northeast of the properties, although the PWS source type is unknown.</p> <p>No development is proposed within 250m or upgradient of the PWS source. It is therefore that the PWS source will not be at risk from the Proposed Development. The development is also unlikely to cross any distribution pipework from the PWS source to the property. Therefore, PWS source and distribution pipework is not considered to be at risk from the Proposed Development.</p> | <p>PWS source and pipework not considered to be at risk.</p> <p>No further assessment, monitoring or mitigation required.</p> |
| PWS02                    | Kirkcroft                                 | Survey<br>Stream                  | E 315726 / N 587797                                                        | Residents at Kirkcroft have confirmed that the properties are supplied by a stream abstraction                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                      | PWS source potentially at risk.                                                                                               |



| PWS ID<br>(Figure 9.3.1) | Property Name          | Data Source<br>and Source<br>Type | Location of PWS<br>Source and Distance<br>from the Proposed<br>Development                                             | Details                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                  | PWS Risk<br>Assessment<br>(see Table 2)                                                                                            |
|--------------------------|------------------------|-----------------------------------|------------------------------------------------------------------------------------------------------------------------|--------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|------------------------------------------------------------------------------------------------------------------------------------|
|                          | Smithy Hill<br>Cottage |                                   | Approximately 660m<br>southwest of turbine<br>T3.                                                                      | from the Kirkcroft Burn. Water is gravity fed to a<br>holding tank (E 315156 / N 587781) before it is fed<br>to both properties.<br><br>Part of the proposed access track is located within<br>the upstream catchment of the Kirkcroft Burn. It is<br>therefore considered that the PWS source is<br>potentially at risk from the Proposed Development<br>and further assessment is required.                                                                                                                                                                                                                                                                                                                                                                            | Further assessment<br>required (Step 2) – see<br>Section 3.                                                                        |
| PWS03                    | Balgray Hill Farm      | Unknown                           | E 315508 / N 586333<br>(property location)<br><br>Approximately 630m<br>southwest of the<br>proposed BESS<br>location. | The residents were unavailable during the survey<br>and no questionnaire has been returned at the<br>time of reporting. In addition, no information has<br>been provided by DGC. If the property is supplied<br>by a PWS source, it is likely this will be sourced<br>east (upgradient) of the property.<br><br>No development is proposed within 250m or<br>upgradient of the property. It is therefore<br>considered that if the property is supplied by a<br>PWS source, it will not be at risk from the<br>Proposed Development. The development is also<br>unlikely to cross any distribution pipework from the<br>PWS source to the property. Therefore, PWS<br>source and distribution pipework is not considered<br>to be at risk from the Proposed Development. | PWS source and<br>pipework not<br>considered to be at risk.<br><br>No further assessment,<br>monitoring or mitigation<br>required. |
| M1                       | Corsehill              | Survey<br>Mains                   | N/A                                                                                                                    | Property confirmed to be supplied by mains.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                              | No further assessment,<br>monitoring or mitigation<br>required.                                                                    |



## 3.0 Qualitative Impact Assessment (Step 2)

This Section of the report provides assessment of PWS sources which has been identified as potentially at risk from the Proposed Development.

### 3.1 Committed Mitigation

**Chapter 9** of the EIA Report details the mitigation measures that would be deployed and used to safeguard the water environment and abstractions. Of relevance to this report and assessment are the following:

- the production of a final Construction and Environmental Management Plan (CEMP) which would be agreed with statutory consultees prior to commencement of any works;
- the deployment of an Ecological Clerk of Works (ECoW) to oversee all works and with the authority to cease works should a risk to the water environment (e.g. change in water flow or quality) become apparent; and
- a commitment to undertake preconstruction (baseline), construction and post construction water quality monitoring and reporting.

### 3.2 Assessment of PWS02 – Kirkcroft and Smithy Hill Cottage

**Table 4: PWS02: Summary Details**

| Descriptors                | Details                                                                              |
|----------------------------|--------------------------------------------------------------------------------------|
| Date Visited               | March 2025                                                                           |
| Source Type                | Stream                                                                               |
| Location                   | Approximately 660m southwest of turbine T3.                                          |
| Photograph of Holding Tank |  |

As discussed in **Table 3**, it has been confirmed that the PWS source is sustained by a surface water abstraction from the Kirkcroft Burn. The Kirkcroft Burn flows generally westwards within the south western extent of the site before discharging into the Dryfe Water



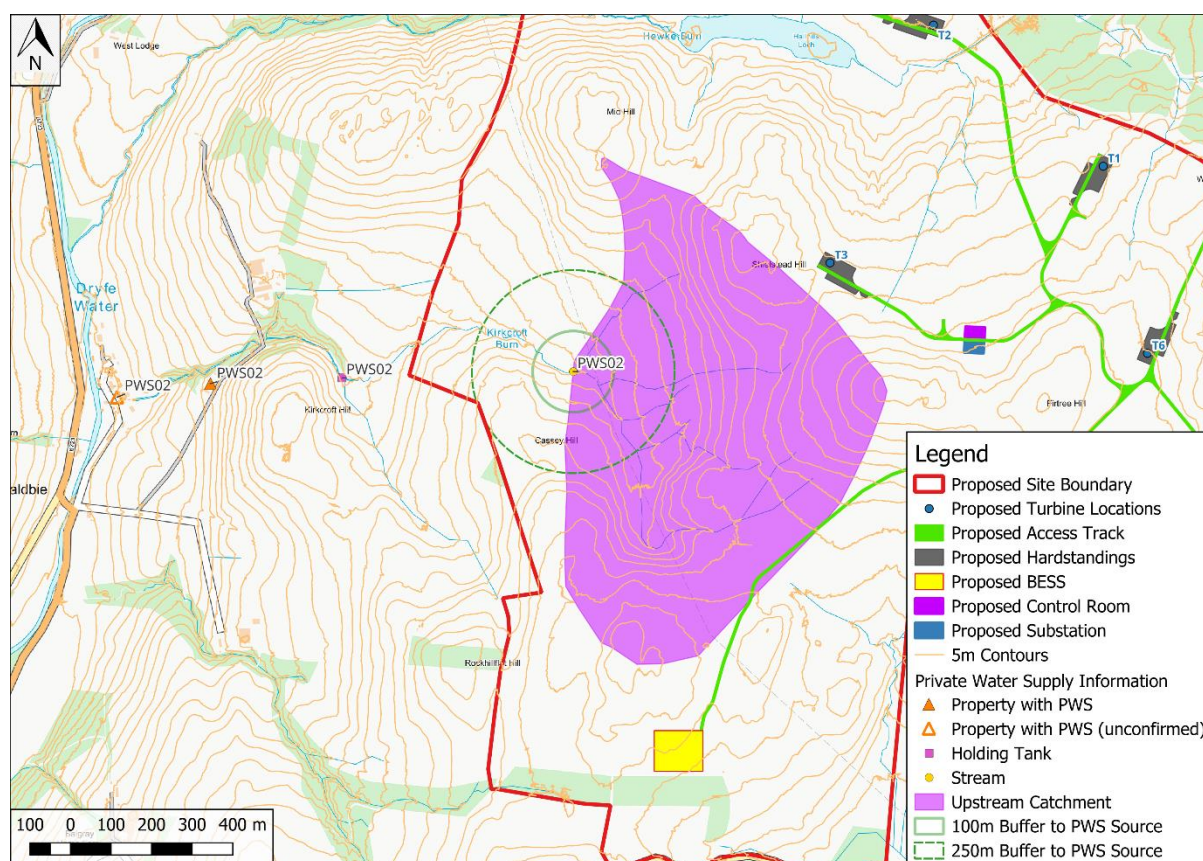
approximately 780m west of the site. Several tributaries of the Kirkcroft Burn rise within the site, which will also sustain the PWS source.

Ground elevations locally fall to the west towards the Dryfe Water. The upstream catchment of the PWS source has been delineated using the 5m contour extracted from the 0.5m Digital Terrain Model (DTM) downloaded from the Scottish Remote Sensing Portal and is shown on **Plate 1**.

The water catchment is shown to extend to the east from the PWS source. It is shown that approximately 270m of the proposed access track is located within the upstream catchment.

It is noted that no construction activities are proposed within 250m of the PWS source.

**Plate 1: PWS02: Water Catchment Area**



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**Table 5** presents a qualitative risk assessment of PWS02, as required by SEPA's guidance. No significant risk is identified to the PWS source and therefore no requirement to progress to Step 3 of SEPA's guidance, e.g. a quantitative risk assessment.

**Table 5: PWS02: Qualitative Risk Assessment**

| Descriptor            | Assessment                                                                                                                                                                                                                                                                       |
|-----------------------|----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| Risk to Water Quality | <p>Elements of the Proposed Development are noted upstream of the watercourse which sustain the PWS source, however, it is noted that all elements are &gt;250m away from the PWS source.</p> <p>The watercourse which may supply the PWS source is vulnerable to pollution.</p> |



| Descriptor              | Assessment                                                                                                                                                                                                                                                                                                                                                                                                                                                            |
|-------------------------|-----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| Risk to Water Quantity  | Subject to detailed design of the proposed access track ensuring that existing surface water flow paths and the catchment area draining to the Kirkcroft Burn are maintained, no detrimental effect on yield of the water supply would occur.                                                                                                                                                                                                                         |
| Recommendation          | <p>Confirmatory baseline, construction and post construction water level/flow and quality monitoring at the PWS source should be undertaken.</p> <p>Works within the PWS surface water catchment should be supervised and measures deployed to prevent and minimise the generation of pollutants and suspended solids (these measures should form part of the final agreed CEMP).</p> <p>No refuelling of vehicles should be undertaken within the PWS catchment.</p> |
| Additional Mitigation   | None over and above that specified in <b>Chapter 9</b> of the EIA Report.                                                                                                                                                                                                                                                                                                                                                                                             |
| Overall Risk Assessment | The controls which would be adopted during construction and operation of the Proposed Development, which are in accordance with best practice and will be agreed in the final CEMP, will safeguard surface water and groundwater which sustains the PWS source. The likelihood and magnitude of impact on the PWS source is therefore assessed as negligible, and the resultant significance of effect is assessed as negligible and not significant.                 |



## 4.0 Example Monitoring and Contingency Plan

Monitoring of the surface water catchments that drain from the site and PWS02 source (as identified in Section 3) has been recommended to confirm that the embedded mitigation included in the site design and committed to in the EIA Report are effective and that there is no impairment of the water environment and water sources.

Pre-development monitoring data can be used to establish baseline water levels and quality and assessment or trigger values to which routine monitoring data collected during construction can be compared against.

A separate water monitoring and reporting plan would be developed during the detailed project design phase. The monitoring programme would be secured by a pre-development planning condition to be agreed with statutory consultees. It is expected that the water monitoring plan would contain the following:

- in accordance with SEPA guidance monthly baseline monitoring for a period of at least 12 months, fortnightly monitoring at PWS02 and monthly at other locations, and post construction monitoring at a frequency of not less than monthly;
- location of proposed monitoring locations (NGR and plan);
- proposals for baseline, construction and post construction monitoring and reporting;
- commitment to prepare and adhere to a pollution incident response plan;
- a commitment to maintain wholesome water supplies at all private water supply sources.

**Table 6** shows an example protocol which could be used as a basis to agree a water monitoring protocol with relevant consultees.

**Table 6: Example Monitoring Protocol\***

| Location                                                                                                           | Frequency                                                                            | Determinand Suite                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                       |
|--------------------------------------------------------------------------------------------------------------------|--------------------------------------------------------------------------------------|-------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| <ul style="list-style-type: none"> <li>• PWS02</li> <li>• Surface water catchments that drain the site.</li> </ul> | Monthly for 12 months prior to, during construction and 12 months post construction. | Field Sampling <ul style="list-style-type: none"> <li>• pH</li> <li>• Electrical conductivity</li> <li>• Dissolved Oxygen</li> <li>• Redox</li> <li>• Temperature</li> <li>• Water Level and/or flow</li> </ul> Extractive Samples <ul style="list-style-type: none"> <li>• Chloride</li> <li>• Alkalinity</li> <li>• Sulphate</li> <li>• Sodium</li> <li>• Potassium</li> <li>• Calcium</li> <li>• Magnesium</li> <li>• Ammoniacal Nitrogen</li> <li>• Nitrate</li> <li>• Nitrite</li> <li>• Orthophosphate</li> </ul> |



| Location | Frequency | Determinand Suite                                                                                                                                                                                                                                                                                                                                                                                                                                                                     |
|----------|-----------|---------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
|          |           | <ul style="list-style-type: none"> <li>• Biological Oxygen Demand</li> <li>• Chemical Oxygen Demand</li> <li>• Iron (total and dissolved)</li> <li>• Manganese (total and dissolved)</li> <li>• Total suspended solids</li> <li>• Dissolved organic carbon</li> <li>• Colour</li> <li>• Turbidity</li> <li>• Taste</li> <li>• Odour</li> <li>• Other parameters relevant to the activities being undertaken or the hydrogeological setting e.g. hydrocarbons, metals, etc.</li> </ul> |

\* Monitoring locations, suite and frequency to be agreed with statutory consultees

## 4.1 Monitoring and Reporting Personnel

The monitoring and reporting would be undertaken by appropriately experienced and trained staff.

## 4.2 Monitoring Methodology

Water samples would be collected following guidance within SEPA, July 2003, Guidance on Monitoring of Landfill Leachate, Groundwater and Surface Water, v2 (specifically Section 9 thereof).

Prevailing weather conditions, qualitative flow conditions as well as other visual indicators would be recorded in order to aid the sample reporting.

The water samples would be placed directly into appropriate sterile bottles, which would be labelled and dispatched to a UKAS accredited laboratory under chilled conditions and accompanied by the relevant chain of custody documentation.

## 4.3 Example Intervention Strategy

In the unlikely event that the routine monitoring data recorded potential pollution at a private water supply an investigation would be undertaken and intervention strategy would be implemented. The details of this would be agreed prior to any construction and secured by an appropriately worded planning condition.

### 4.3.1 Alerting Potentially Affected Properties

Contact details (land and mobile numbers / email addresses) for private water supply users would be maintained by site management at all times.

In the event that monitoring data collected at any private water supply is above the baseline monitoring record and above prescribed regulatory standards then property owners would be advised and repeat water sampling undertaken (if agreed with the property owners). Property owners would be advised within 24 hours of receipt of monitoring results. Repeat water sampling would be undertaken as soon as reasonably practicable and within 72 hours.



Details of any affected property would be reported to DGC within the timeframe as agreed with DGC when the monitoring programme was agreed and finalised.

#### **4.4 Provision of Alternative Water Supplies**

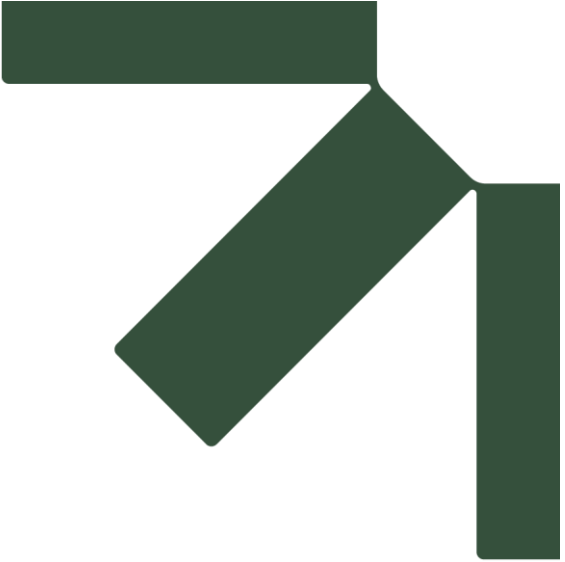
The Applicant commits to maintaining the yield and wholesomeness of water supplies.

The following measures may be deployed in the unlikely event a private water supply is impaired by the works:

- provision of bottled potable water in the event of a short or transient derogation of a water supply (bottled water would be retained on site ready for quick dispatch to any affected property); and
- provision of an alternative water source (e.g. spring, borehole, alternative surface water abstraction location) in the event of a permanent derogation of a water supply.

In the event of an alternative water source being implemented DGC would be advised as soon as is practical.





# Figures

## Technical Appendix 9.3: Private Water Supply Risk Assessment

Balgray Wind Farm

Fred. Olsen Renewables Ltd  
SLR Project No.: 405.065655.00001

7 April 2025



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