Application under the Electricity Act 1989, section 36
Proposed Mid Hill Wind Farm, Scottish Borders.

Scoping Report Response
by Borthwickwater Landscape Conservation Group
December 2024

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1 INTRODUCTION

1.01 This report responds to the Environmental Impact Assessment (EIA) Scoping Report for the proposed Mid Hill (Borders) Wind Farm (MHWF or Proposal). It has been prepared by the Borthwickwater Landscape Conservation Group (BLCG), a group of residents living in the vicinity of and potentially affected by the proposed Wind Farm.

1.02 The proposed MHWF requires consent under Section 36 of the Electricity Act 1989 and the Town and Country Planning (Scotland) Act 1997, from Scottish Ministers. Under these statutes the Proposal constitutes 'EIA development' and therefore requires the developer to prepare an EIA Report to accompany the Section 36 Application. The EIA Regulations [1] provide for a prospective developer to request a Scoping Opinion from the Scottish Ministers on the topics and scope to be covered by the EIA. The developer's request, presented as a Scoping Report, identifies the location of the Proposal, a description of the proposed development and its likely effects on the environment. Public bodies and the public generally have been invited to offer comments on the Scoping Report and thereby influence the scope of the prospective EIA.

1.03 The Scoping Report for the proposed MHWF states the development currently consists of 42 wind turbines, with tip heights of 200m, a battery energy storage facility, a substation, access tracks and associated works. Whilst the intended location of the turbines is indicated the position of other elements of the development is not given. The Proposal is located on uplands lying between the River Teviot and the Borthwick valleys, some 11km south west of Hawick, within the Scottish Borders Council area of Scotland. The Scoping Report states the site covers 4,750 hectares, although the delineated site [2] has been measured at circa 1,925 hectares. The site is very broadly rectangular aligned northeast to southwest, broadly measuring some 3.5km wide (north west to south east) and up to a maximum 6km at its longest (from north east to south west). The site is currently rough uplands grazing on peats, typical of the wider Borders upland areas. The lowest point of the site, in the Borthwick valley, has a height of 170m whilst most of the site is over 300m above ordnance datum (AOD) and the highest point on the site is 350m high.

1.04 This report provides BLCG's response to the Scoping Report. This sets out the content of the EIA which should be added to the Scoping Opinion and covered in the subsequent EIA Report.

[1] Electricity Works (Environmental Impact Assessment) (Scotland) Regulations 2017 (EIA Regulations).
[2] Shown in Scoping Report, Figure 1.2.

2 BLCG'S RESPONSE TO THE SCOPING REPORT

2.01 The following matters should be added to the Scoping Opinion and covered in the Environmental Impact Assessment Report for the proposed s36 Application for the proposed MHWF.

2.02 That the viewpoints to be considered in the Landscape and Visual Impact Assessment (LVIA) should be extended to include the following points:

No	Name	Easting	Northing
1	Eilrig	336990	608733
2	Hoscote House	339202	611554
3	Milsington Viewpoint	340313	612371
4	Meadowshaw	338299	609917
5	Girnwood	337978	611589
6	Chisholme	341771	612113
7	Borthwick Braes bend	341648	613467
8	Ogilvie Memorial	344990	608733
9	Field road over hill	342101	611308
10	A7 mid-point, opposite the site	342764	607333
11	Roman & Reivers Trail/ Catrail	340544	610321
12	Hizzy Cairn	339305	603947
13	Colterscleugh Monument	341015	606635
14	Eildon Hills	345820	632296

These are justified to ensure that the LVIA appropriately takes into account the local visual impact of the Proposal, together with impacts on recreation, tourism and visitors in the area. Given this, it is accepted that the applicant's suggested Viewpoint 7 (Burnfoot) is unnecessary.

2.03 That the extent of the Residential Visual Amenity Assessment (RVAA) be increased to properties within 4km of the proposed turbines and the industrial structure and

building on the site (locations of which are unknown at present). It is noted that: the Scoping Report does not accurately describe the RVAA guidance; that the circumstances of the site, with the base of turbines located some 120m to 190m above the elevation of residential properties in the area, means that the visual effects will be well beyond the extent considered in the guidance and this therefore requires careful adaption of the guidance; and that the visual impact of the Proposal (which includes industrial structures alien to the context) will be caused by more than just the turbines.

2.04 Given the revised guidance issued by NatureScot (November 2024) the LVIA and the RVAA should take account of aviation lighting and compliance with the guidance.

2.05 Consideration in the EIA should be given to all energy related developments in the area, that are known to the public. That now includes the 400kV overhead power line from Gala North to the Border with England, which is currently proposed to cross the site. Consideration should also be given to how the Proposal might need to be adapted to accommodate the OHL through the site.

2.06 The Scoping Report states (at 2.2.8) that the grid connection, linking the proposed wind farm to the electricity to export the power produced, would be subject to a "separate" application. Given that the benefit of the proposal cannot be realised without a grid connection this should be treated as an integral part of the application and within the scope of the EIA. As a minimum the cumulative landscape and visual impact of the grid connection should be included within the EIA for the Proposal. The Scoping Report gives no detail on the scale and location of the proposed 'battery storage'. As well as location and landscape and visual impact the EIA should clearly set out the capacity of the proposed storage so that it potential energy value can be understood.

2.07 It is noted that the Scoping Report gives little to no detail on the effects arising from Traffic and Transport. Given that preliminary details of the traffic requirement must be known that is surprising and disappointing. Particularly since it is known that there have been major traffic problems in the area from other recent wind farm developments. The EIA should therefore give a full assessment of the traffic and transport effects of the Proposal, including an accurate figure for the quantity of additional traffic required, the timing of movements, the routeing of movements, with specific data on abnormal loads, including how previous disruption will be avoided, given the limited roads infrastructure in the region and weight limits on access bridges.

2.08 When providing information on the climate and carbon balance the EIA should take account of the carbon consequence and potential benefits over the full life of the Proposal, taking account of the current and future transmission capacity in the region and the local demand, as well as the on-site and construction carbon cost. This should

include individual blade lifespans and the potential for blade delamination creating contaminants to the ground and water courses.

2.09 When assessing tourism, recreation and socio-economic consequences of the Proposal the EIA should focus upon the effects in the local vicinity, with specific consideration to businesses, recreational and visitor premises within 5km. The assessment should also consider the potential effects of the proposed Center Parcs development 10km away to the North West of the Proposal.

2.10 When addressing the Eskdalemuir Array the EIA should fully take account of the headroom budget and, in the event that it is identified that there is no further room within the headroom budget, the Application should be immediately cancelled or withdrawn, to avoid unnecessary distress to the local residents.

2.11 Given the position of the prospective turbines at a considerable height above surrounding residential property shadow flicker should be scoped into the EIA. The standard shadow flicker assessment footprint should be substantially extended to take account of the topography as well as the shadow of the proposed turbines.

2.12 Given the existing and proposed public access to the site, ice throw should be scoped into the EIA. The risks to public safety should be appropriately assessed.

2.13 Given the stress that the Proposal has already had and will cause to the local residents 'population and human health' should be scoped into the EIA.

2.14 Whilst the scale and location of the proposed battery energy storage is not specified in the Scoping Report, it is known that such facilities are a fire risk. The EIA should therefore assess the potential risk to atmospheric pollution, contamination of water courses (recognising their importance to the local area), including the risk to many spring-fed properties, and to the wild breeding Atlantic Salmon as well as the risk to public safety, together with the resources available to the local fire service and the limited accessibility of the site.

2.15 Given that the research on infrasound and low frequency noise referred to is now 15 years old and further development are taking place infrasound and low frequency noise should be scoped in. Similarly, the research on amplitude modulation referred to is now out of date, amplitude modulation should be scoped in. In respect to uncorrelated noise sources due account should be taken of the proposed overhead powerline in the vicinity.

2.16 Scant details are provided in the Scoping Report on Ornithology and Ecology. From local knowledge the effects on the following species should be assessed within the EIA:

- Breeding Mute Swans - these are big heavy birds that require clear take-off and landing routes - these will be severely restricted by the turbines - big heavy birds are vulnerable to blade strike.
- Range of breeding geese/ ducks/ grebes - geese and larger ducks (Golden eye used to overwinter up there, all vulnerable to blade strike.
- Range of ground nesting birds - Curlew, Red Grouse, Black Grouse, Oystercatchers and Lapwing.
- Golden Eagles.
- Breeding Buzzards, Hen Harriers, Merlin, and Osprey.
- Breeding Ravens, Crows, Kestrels, Sparrowhawks, and Goshawk.
- Skylarks, Cuckoo, wood pigeon, Swallows, Grey and Pied wagtails, Tawny Owl, Common Sandpiper, Heron.
- Otter, Roe deer, Brown Hares, Badger and Fox, Mole, Field Mice, Weasel, Brown Rat, Common Vole, Stoat and Red Squirrels.
- European Eel as well as salmonoids in the Muselee burn.
- Common lizard, adders, newts, frog, and common toad.
- Bats.
- Damsel and Dragon flies.
- House Martins.
- Red Kite, Jackdaw, Jay, Goosander, Dippers, Barn Owl, Sand Martins, Fieldfare, Redwing, Redstart, Kingfisher, Greater Spotted Woodpecker, Magpie,
- Range of small birds (goldcrest, long tail tits, crossbills, nuthatch, tree creepers, redpoll, goldfinch, starlings, song and mistle thrush, blackbird, greenfinch, bullfinch, chaffinch, blue/great/coal tits, wren, dunnock, siskin, reed bunting, willow warbler, spotted fly catcher, robin, stonechat).

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