

Mrs Sarah Laing
UL&HCC Secretary,
c/o Twislehope Farm House
Hermitage
Hawick
TD9 0LS
2nd January 2015

Dear Sarah,

Application Number: 13/00789/FUL

Proposed Development: Wind Farm development comprising of 9 No. wind turbines up to 125m high to tip and associated infrastructure/buildings/access (revised scheme – eastern array removed, western array retained, turbine added to western array, tip heights all raised to 125m, access route changed).

Location: Land North East and North West of Farmhouse Braidlie (Windy Edge), Hawick, Scottish Borders.

Please find below my response to your December 2014 community view letter.

I do not support the wind farm application and object to the above development on the following basis:

A. I believe the **validity and coherence** of Chapter 9 (Noise) in the FEI, and its conclusion is not accurate: **“ Thus the operational noise impact experienced by residents at all properties would be considered ‘not significant’”. (9.5.7)**

In Summary:

- 1) There are major inconsistencies in data and discrepancies between Figure A2.1 (Revised Site Layout), Table A2.2 (Location of wind farm components) and Addendum Annexes 9.1 and 9.2,
- 2) Frequent reference is required to the July 2013 application ES, contrary to SBC requirement placed on the developer,
- 3) There is a misleading statement relating to distances from residential receptors, i.e. **“The revised scheme has resulted in an increase in the separation distances between residential receptors and the turbine locations.”** This is **not** the case. In fact, ‘old’ T1,2,3,5 have become ‘new’ T1,2,3,4 and **all** of these are **closer** to the Braidlie and Hermitage Water properties. For example, new T1 is now **280m nearer** to non- financially involved receptors such as Gorrenberry House, (new separation distance = 1784m) and Upper Dinley Cottage, (new separation distance = 1743m), to name just two. This is well within the Scottish Government’s guideline 2km separation distance and therefore is unacceptable.
- 4) The claim that the increase in height/generating capacity of turbines will have no adverse noise effects on residential properties is not robustly established. (And, the SBC Environmental Health Officer has requested further specific information from Infinis). Nor are the statements relating to the significance of construction noise to non-financially involved properties, such as Upper Dinley Cottage. For example, the new separation distance of the south-western borrow pit to residential property is 1230m. However, this ‘marginal’ amount

of change, according to Infinis, actually moves the borrow pit **270m** closer to Upper Dinley Cottage and others. There is no indication provided by the developer of what the predicted construction noise level would be at this property or other non-financially involved ones.

B. Chapter 10: Access, Traffic and Transport:

1. Nacelle and other turbine components – abnormal loads and the weight issue :

Chapter 12, section 5.7 of the July 2013 ES helpfully states,

“ The nacelle will be the heaviest single component, the overall weight of this TDV being in the region of **140 tonnes** “.

Unfortunately, Chapter 10 and its accompanying Annex 10.1 Abnormal Loads Route Assessment,(ALRA), makes no such reference for the Nordex N90 /2500 HS 2.5 MW nacelle weight. Only the blade length and maximum tower section are referred to in the documentation. Yet, presumably, as the Nordex N90 is of greater power output than the previous Repower MM82 2.05 MW, then it will be heavier than 140 tonnes. The B6399 from Whitrope Tunnel Cottages to Hermitage has a **10 ton limit restriction**, for obvious reasons. The particular stretch of road from Whitrope Tunnel Cottages, past Windshielknowe Cottage, to the Whitrope Heritage Centre access point for the proposed route is approximately 500 metres. This is totally unsuitable for loads of the nacelle magnitude. On the immediate RHS of this narrow road there is a steep fall off down to the Whitrope Burn. Yet, Annex 10, 1.17 only refers to temporary road widening on the land just north of the access to enable a TDV manoeuvre into it. There is no mention of any assessment of road cores and potential remedial strengthening of this section of the B6399 road. (Unlike 10. 1.13 – in the case of the Unclassified Road between A6088 and the B6399).

The December 2014 SBC Roads planning Dept. response indicates that for the abnormal load deliveries, (i.e. turbine sections, blades, nacelles, etc.), this 10 ton load limit may be relaxed or temporarily suspended. This could cause a range of unintended consequences: in Autumn 2014 we experienced a range of problems with unloaded and loaded (42tonnes), timber articulated wagons taking an unauthorised short cut and using the B6399 between Hermitage and Whitrope. Clearly, such loads which well exceed the 10 ton limit on this section can cause road subsidence in places as well as damage to the small bridges. This matter was eventually resolved with the assistance of our SBC ward councillors and Mr James English, (the South of Scotland Timber transport liaison officer, based in D&G). **How can the 10 ton load limit be maintained and enforced in future, if SBC are prepared to make a precedent and exception to accommodate Infinis?**

TDV abnormal load deliveries are predicted to occur during months 9 and 10 of the construction phase, with **36** such TDV movements in **each** of these months. During the abnormal load delivery periods, no other local traffic will be able to use the B6399 either southbound from Hawick to Newcastleton, or vice versa. Alternative and longer routes would have to be used, causing great inconvenience to all concerned. Also, all along the proposed route, once the TDVs are on the B6399, there are many ‘pinch points’ and the potential for damage to the infrastructure of this road, which already has a range of structural issues.

2. **HGV and other vehicle movements during the Construction phase:** Tables A10.2 and A10.3 indicate that over the 12 month construction period, there are predicted to be a minimum of 13400 vehicle movements, with 4573 being HGVs. For example, during the first 3 months there will be 4280 vehicle movements, of which 2745 will be HGVs and during month 2 alone, there will be 65 HGVs each working day! **I request that UL&HCC acknowledge the unacceptable, detrimental implications of the above for the residents at Whitrope, as well as the rest of the community in this ward.**

C. The Implications of Cumulative Impact for Upper Liddesdale and

Hermitage: the Windy Edge development injects a new industrial wind farm into an area that, unlike other areas of the Borders, currently has none. Figure A4.13b, (attached) indicates the cumulative wind farms within 35km of Windy Edge. Of particular interest, (and concern), are 3 other proposed developments which may have a significant impact upon the UL&HCC locality: Highlee Hill Wind Farm – has lodged scoping and has had responses, Newcastleton Forest Wind Farm – x3 Wind mast application approved by SBC early last year and at pre-application stage AND Wauchope Forest Wind Farm, also at pre-application stage. The latter is of significant concern as the ZTV map indicates it comes right down to Riccarton Junction and Saughtree.

The impact for our locality if some, or all of these applications are approved, would significantly change the character of the area and be incredibly destructive, (and permanent,...see below). Windy Edge, (if approved), could be the start of this process of industrialisation of this unique area of natural beauty and historical and cultural significance.

D. Durability and reversibility of Impacts: In Chapter 4 of the FEI on Landscape and Visual, mention is made by Infinis of the reversibility of impacts after the scheme is decommissioned in 25 years time. However, there is no mention of the Scottish Government's recent planning legislation, particularly SPP 170 which suggests that a site must be suitable for use "**in perpetuity**". So,.....will any decommissioning occur in the future?

E. Is Windy Edge even needed?.....Scottish Government Renewable Energy Targets are already met!!!!

Infinis have used the Scottish Government's renewable energy statistics from June 2014 to suggest that there is still a 2.7GW gap against the 2020 target of 16GW and so argue that their meagre 22.5MW, (0.0225GW), will make a "significant and valuable contribution", to this unmet target. Regrettably, Infinis appear prone to making such bold statements, when a situation has already been overtaken by events. Infinis are simply out of date and things have moved on dramatically since June 2014, (see the paper attached by Professor Jack W Ponton, FREng, 16 October 2014 which states:

"100% of Scotland's electricity" from renewable sources could already be more than 98% achieved by operational and consented developments to August 2014, with a large additional capacity in planning. Consent of a further 2.284GW of offshore wind in October means that estimated generation from operational and consented renewables could now meet 116% of consumption"

So, why should a scheme be supported, which would have such a devastating impact upon the landscape and historical importance of our locality when it is not even needed?

F. Visual Imagery Impacts on Landscape and the Setting of Hermitage Castle:

As mentioned above, we have a beautiful and unique landscape in the Hermitage Water Valley and in Upper Liddesdale. Hermitage Castle is a central focus for the region's Border Reiver cultural history. The attached photomontages illustrate how all of this will be seriously degraded by the presence of this industrial aberration in our area. Indeed, how anyone can suggest that these turbines are 'contained' within the landscape, beggars belief.

Yours sincerely,
Malcolm R McGregor
Whitropefoot Farm
By Hermitage
HAWICK
Roxburghshire
TD9 0LZ