Longcroft Wind Farm Proposal

Report on feedback

Image: View from Station Road, Oxton

September 2023

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1. INTRODUCTION

1.1 Purpose of this report

RES has considerable experience in developing onshore wind projects throughout the UK and believes in the importance of community consultation to identify issues and concerns, as well as benefits and opportunities, which can be considered when developing and designing a project.

The purpose of this report is to summarise the written feedback received from the community during the May 2023 public exhibitions and subsequent consultation period regarding the design of the proposed development and highlight any changes that have been made to the proposal since. Each section focuses on a key topic area and summarises the feedback received, followed by RES' response.

1.2 May 2023 exhibitions and consultation

RES held two public exhibition events in the local area (Oxton and Lauder) in May 2023 as part of its pre-application consultation on the proposed Longcroft Wind Farm. These events provided people with the opportunity to learn more about the project, discuss the proposal with the project team, and provide written feedback to RES on the preliminary site layout.

A range of information was made available, including visualisations prepared to NatureScot guidance which helped to give an impression of what the site could look like from different viewpoints in the area. RES staff were on hand to discuss the proposal and answer any questions. A four-week consultation period followed the exhibitions for people to submit written feedback to RES on the proposal and early stage design. More than 71 people attended the events and 36 comments forms were received by the time that the consultation period closed – providing comments across a variety of topics.

RES included a multiple-choice question on the comments form that asked people about their attitude to the proposal for a wind farm at Longcroft. The breakdown of responses is as follows: 31% responded as supportive; 22% responded as 'neutral'; 44% responded as 'opposed'; and 3% responded that they didn't like onshore wind farms in general.

RES also included a multiple-choice question that asked if the wind farm went ahead as currently designed, what people thought about the turbine and infrastructure layout. The breakdown of responses is as follows: 51% responded that they had concerns about the proposed layout; 23% responded that they were neutral to the proposed layout; 20% responded that they were happy with the proposed layout; and 6% responded that they didn't like onshore wind farms in general.

The consultation feedback submitted to RES has been considered by the project team as part of the design development, in addition to feedback from key consultees and the findings from the detailed technical and environmental studies that have been undertaken. We are grateful to everyone who took the time to engage with us on the proposal.

2. ENERGY feedback

Approximately 44% of respondents provided comments relating to types of energy generation and the needs case for onshore wind.

2.1 Key themes

The key themes and comments raised within the feedback were:

- **Cost of electricity**: question over whether developing onshore wind reduces fuel bills.
- **Other technologies**: need a diverse energy supply; preference for other forms of renewable energy generation (hydro, offshore) that won't impact the environments in which people live.
- **Onshore wind needs case**: agree with need but this area has its fair share of wind farms.

2.2 RES response to energy feedback

We are in a climate emergency, cost of living crisis and also seeking to enhance the security of our energy supply. Onshore wind can address all of these. This is recognised by the Scottish Government's National Planning Framework 4 (NPF4) which was published in February 2023 and provides the national spatial strategy for Scotland. Policy 11 asserts support for onshore wind farms outside of National Parks and National Scenic Areas. Longcroft is outwith such national landscape designations.

Onshore wind plays an important part in creating a balanced energy mix and is required alongside other technologies, all of which have their merits in relation to cost, efficiency, environmental or social benefits. In response to the climate emergency the focus on developing more onshore wind within Scotland has only strengthened – with national targets now set for installing 20GW of onshore wind across Scotland by 2030 to help towards meeting Net Zero carbon emissions by 2045.

Onshore wind, alongside other renewable energy technologies, can generate the cheapest form of new electricity generation. With the rising cost of living and climate change emergency, it is imperative that we deliver electricity efficiently and at lowest cost to the consumer.

3. LANDSCAPE and VISUAL feedback

Approximately 36% of respondents provided comments relating to the landscape and visual aspect of the proposal which covered a variety of themes.

3.1 Key themes

The key themes and comments raised within the feedback were:

- **Turbine height:** turbines too big; too visible over wide area.
- **General comments**: cumulative impact – have enough wind turbines in this area; will spoil views.
- **Exhibition visualisations**: visualisations were limited; would like to see additional viewpoints.
- **Residential amenity**: turbines will be visible from local properties; residential amenity will be affected.
- **Aviation lighting:** aviation lighting will cause light pollution.

3.2 RES response to landscape and visual feedback

Wind turbine technology has advanced considerably in recent years, meaning that wind turbines are now taller and more efficient which enables them to generate a significantly greater amount of electricity per wind turbine.

Modern taller wind turbines provide more electricity, which helps address the climate emergency, cost of living crisis, and security of energy supply. The 220m tall wind turbines proposed at Longcroft Wind Farm would allow for far greater benefits in terms of renewable electricity generation per wind turbine than smaller turbines would.

Our landscape architects have undertaken extensive assessment work to inform the design development and turbine layout. Key changes (since the May 2023 exhibitions) include the reduction in turbine numbers from 21 to 19 and the movement of each wind turbine location to varying degrees to refine the design and minimise impacts wherever possible. We are looking to achieve a design that strikes an acceptable balance between the visibility of the proposal and its ability to generate significant amounts of renewable energy. Ultimately, the acceptability of this design will be assessed by the determining authority in relation to current energy policy and planning requirements having considered feedback from consultees as well as representations by members of the community and wider public.

Wind farms are quite often sited on hills or areas of higher ground in Scotland as the wind regime tends to be better in these locations – with smoother and less interrupted wind. However, hills tend to create more visible sites and so the turbine height needs to be assessed accordingly from a landscape and visual perspective to understand if the proposal may be appropriate from a planning perspective.

The Scottish Government's Onshore Wind Policy Statement, published in December 2022, states in paragraph 3.6.1 that *"Meeting our climate targets will require a rapid transformation across all sectors of our economy and society. This means ensuring the right development happens in the right place. Meeting the ambition of a minimum installed capacity of 20 GW of onshore wind in Scotland by 2030 will require taller and more efficient turbines. This will change the landscape."*

At our May 2023 public exhibition events we provided five visualisation boards showing how the proposal may look based on the preliminary site layout from five viewpoints within the local area. These viewpoint locations were selected in order to demonstrate the most "localised" effects of the proposed development, which would be of most interest to people attending the exhibitions. At this final set of exhibitions, we have chosen to display the same five viewpoints to show the updated turbine layout. These viewpoints are among a total of 30 agreed with NatureScot, Scottish Borders Council & East Lothian Council which will be assessed in the application. All visualisations were and will continue to be produced to well established and recognised standards set by NatureScot.

The Residential Visual Amenity Assessment (RVAA) is an important component of the wider Landscape and Visual Assessment which is undertaken as part of the Environmental Impact Assessment (EIA). Following feedback through the Scoping process and public consultations we have been working carefully with the design to minimise potential impacts of the site on residential amenity by increasing the separation distance from wind turbines to settlements and residential properties.

At Scoping, it was confirmed that all properties within 2.5km of a proposed turbine in the final development area would be included within a standalone Residential Visual Amenity Assessment (RVAA) that would accompany the Landscape and Visual Impact Assessment. This RVAA is now underway, and properties within 2.5km will be contacted directly to request access to help inform the findings of the RVAA.

In accordance with the Air Navigation Order 2016, en-route obstacles at or above 150m, such as the wind turbines proposed at Longcroft Wind Farm, require to be lit at night with medium intensity red aviation lights. Aviation lighting on turbines at or above 150m is set at 2,000 candela on the nacelles. In some circumstances, not all turbines within a wind farm are required to be lit. Furthermore, the aviation lighting is designed to focus the light across and upwards for the attention of aircraft rather than downward to those at ground level.

The light intensity varies in response to weather conditions and visibility (via an atmospheric conditions and visibility sensor on the turbine) – with lighting dimmed to 10% of their intensity in good visibility (typically greater than 5km) but maximised in cloudy or foggy weather (where visibility is typically less than 5km). Consultation is underway with the Civil Aviation Authority (CAA) to agree a lighting strategy with them. If agreed in time, the agreed lighting strategy will be presented in the planning application which will also include a night-time assessment and visualisations. If CAA response timescales do not allow for this, a "worst-case scenario" will be presented in the assessment at application stage.

4. ENVIRONMENT feedback

Approximately 22% of respondents provided comments in relation to the impacts on the surrounding environment.

4.1 Key themes

The key themes and comments raised within the feedback were:

- **Wildlife:** concerns about potential impact on wildlife (ecology and ornithology).
- **General**: general comments and enquiries about the preservation and management of the environment surrounding the wind farm.

4.2 RES response to environment feedback

Environmental Impact Assessments (EIAs) are a compulsory part of the planning and consenting process for wind farms. The purpose of an EIA is to investigate and mitigate any potential effects of a development on the natural, physical and human environment.

Protecting and minimising any potential direct or indirect impacts on local wildlife and their habitats is of utmost importance and we take this responsibility seriously. We look to mitigate any potential effects of the development during construction and operation on the habitats and protected species that are found to be present or active within the site.

The findings from the wide range of technical studies and environmental surveys (including Archaeology and Cultural Heritage; Hydrology, Hydrogeology and Geology; and Ornithology and Ecology among others) that have been undertaken over the last couple of years will be written up in a comprehensive Environmental Impact Assessment Report (EIAR) which the Scottish Ministers will take into account when deciding whether or not to grant consent for the wind farm.

For instance, a wide range of detailed ecological surveys have been undertaken by qualified ecologists as part of the non-avian Ecological Impact Assessment (EcIA). The non-avian Ecological Impact Assessment (EcIA) survey and assessment work is an extensive undertaking, and the findings will be included in the EIAR.

The planning application and associated documents such as the EcIA and survey data (excluding any confidential annexes) will become available for public viewing and comment as part of the formal consultation period which will be run by the Scottish Government's Energy Consents Unit once the planning application is submitted.

We are in consultation with relevant consultees, including Scottish Borders Council, East Lothian Council NatureScot, SEPA, RSPB Scotland, and Marine Scotland Science with regard to designated sites, protected areas and protected species.

As part of the project design we are also developing an outline Habitat Enhancement and Management Plan for the site which will set out the measures being proposed for the site, including a plans for biodiversity enhancement which will focus on improving the biodiversity already found on the site beyond offsetting any potential loss of biodiversity from the proposed development. Although any enhancement measures proposed will look to offset potential impacts of the project, primarily they will seek to complement the existing conditions for flora and fauna while expanding their effective reach as much as is practicable.

5. CONSTRUCTION feedback

Approximately 17% of respondents provided comments focused on construction.

5.1 Key themes

The key themes and comments raised within the feedback were:

- **Transport route:** more information needed on route between A697 and the site (missing from drawing shown on board); concerns about road safety following recent incidents.
- **General comments**: construction impacts; preservation of site tracks; desire to work on the project.

5.2 RES response to construction feedback

At the time of the May 2023 public exhibitions, there were several options under review for the proposed route connecting the A697 to the site boundary therefore this level of detail was unavailable to view as it had not been fully agreed.

The indicative turbine delivery route has now been updated to show this section of the route and can be found on the relevant 'Environmental Impact Assessment (EIA) considerations' exhibition board. Once components have reached the A697, it is proposed that a blade lifting trailer will be used to travel north along the A697 and right onto the D124 to the site entrance near Longcroft Farm. The site entrance has been carefully designed with appropriate visibility splays to meet strict safety requirements.

RES has commissioned surveys to understand traffic flows and volumes on local roads and assess any potential impacts of construction traffic on the local area. This has enabled RES to identify potential pinch points, bottle-necks, and areas which may require traffic management and will help in developing mitigation strategies. The data collected from the traffic surveys will be presented in the Traffic and Transport chapter of the extensive Environmental Impact Assessment Report (EIAR) that will accompany the planning application.

Should the project be consented, a detailed Traffic Management Plan would be developed and agreed with Scottish Borders Council in consultation with Police Scotland, setting out the steps that RES would take to help mitigate any potential impacts on local traffic and road users and ensure road safety. Some examples of measures that have been taken by RES on other construction projects include: introducing a reducing speed limit for project construction traffic along certain stretches of road; avoiding turbine deliveries between school-drop off and pick-up and/or rush-hours; delivering turbine components at night-time; and, agreeing certain 'routes to site' for daily construction traffic.

As part of the traffic assessment and data-gathering process RES has also commissioned turbine delivery-specific surveys – including swept path analysis along the proposed turbine delivery route as well as detailed assessment of the site access point with regard to visibility splays and safety requirements.

The abnormal load vehicles which deliver the longer turbine components (primarily blades and towers) are specialised multi-axle vehicles, some of which can raise their load height to clear walls and bridges) that are driven by experienced operators. These vehicles have a considerable ability to precisely navigate and manoeuvre along a wide range of roads. Should the project be consented, further detailed survey work and drive-throughs along the route will be undertaken by RES and the turbine haulier to assess any more challenging stretches of the delivery route and ensure that they can be safely navigated.

RES often establishes local Community Liaison Groups (CLGs) during the construction phase of a wind farm to support regular engagement with the local Community Councils and wider public – in addition to project communications and updates via local newsletters and the project website. This approach ensures that questions and concerns or opportunities can be raised to RES and encourages a constructive dialogue to ensure that the project is delivered with consideration to the local community.

RES' construction team has a wealth of experience in managing construction traffic, having built many wind farms within Scotland and across the UK and Ireland, and works closely with the local community to minimise disruption wherever possible. RES also has a strong track record for safety on its projects and within the company's culture. In fact, RES recently won Health and Safety Team of the Year at the 2022 Safety and Health Excellence (SHE) Awards.

6. INFRASTRUCTURE feedback

Approximately 11% of respondents provided comments on battery storage and the grid connection.

6.1 Key themes

The key themes and comments raised within the feedback were:

- **Battery storage:** more information on battery storage; concerns about safety – specifically fire risk.
- **Grid**: general comments and request for more information on where the wind farm will connect in to.

6.2 RES response to infrastructure feedback

The proposed BESS is anticipated to have a storage energy capacity of around 100MWh (megawatt hours). The BESS would help maximise generation capacity and efficiency of the proposal and further contribute to energy security. Full details of the scale and dimensions, minimum and maximum export capacity and a full assessment of the impacts and effects and all proposed mitigation will be included in the Environmental Impact Assessment Report (EIAR) which will accompany the planning application.

The risk of fire at a BESS is low but will be considered and mitigated in the design of the storage general arrangement and consideration of the monitoring and fire suppression system. The BESS is optimised with appropriate container spacing to minimise the risk of propagation across the facility in the unlikely event of a fire. Additionally, fire breaks or spacing from forestry is designed again to minimise fire propagation. A battery management system is also implemented for continuous monitoring of the BESS through its lifetime. The containers housing the batteries typically include dry aerosol fire suppression solutions, favoured over water suppression, as they are successful at reaching all areas within containers and don't require a dedicated water supply.

RES has been advised by the Transmission Owner (TO) that the proposed wind farm will connect to the National Grid via a 132kV connection into Gala North, a new substation near Galashiels. The grid network operators are currently upgrading the grid infrastructure in the country and RES will be required to pay transmission connection charges to National Grid during operation of the wind farm for the grid connection. We have accepted a grid offer from the TO, in this case Scottish Power Transmission (SPT).

SPT, as the TO, is responsible for maintaining and investing in the grid in the south of Scotland. This includes designing connections for transmission grid applications, such as that for the Longcroft Wind Farm, and submitting the planning applications for these connections. As such, the grid route is subject to a separate planning application from the wind farm – and will be submitted as a separate Section 37 planning application under the Electricity Act by the TO once they have finalised their design.

Once the planning application for the grid route is submitted, there will be a consultation period undertaken by the TO during which details of the grid route and method will be available for the public to provide comment to the TO as part of the planning process. Indicative details of the anticipated route of the grid connection for the proposal will also be included by RES within the Proposed Development Description chapter of the Environmental Impact Assessment Report (EIAR) which will accompany the planning application for Longcroft Wind Farm.

7. ACOUSTICS feedback

Approximately 11% of respondents provided comments focused on acoustics.

7.1 Key theme

The key theme raised within the feedback concerned the potential acoustic impact of the wind farm.

7.2 RES response to acoustics feedback

The acoustic profile of the turbines is one of many important considerations that has been assessed and carefully managed as part of the site design. The design process will ensure that the project doesn't exceed the strict acoustic limits which will be set within the planning conditions should consent be granted. These limits correspond to existing background acoustic levels typical in the local area, which will control the wind farm acoustics in relation to nearby residential properties.

Operation and construction acoustic assessments and prediction are undertaken in accordance with the relevant standards, current assessment methodologies and best practice as determined by the regulatory bodies, which include Scottish Borders Council, the Scottish Government and the UK Institute of Acoustics.

In consultation with Scottish Borders Council, we have undertaken a background sound survey at a number of locations around the site to measure the existing background sound levels. The results of the background sound survey are being analysed by our acoustics team and will inform the setting of the sound immission limits for the operation of the wind farm. These limits will be agreed with the regulatory authority, and the site will be required to comply with these strict noise limits set within planning conditions.

The acoustic impact of the wind farm will be modelled and the output of this modelled work will be presented in the Acoustic Chapter of the extensive Environmental Impact Assessment Report (EIAR) which will accompany the planning application. The Acoustic Chapter of the EIAR will demonstrate that RES has considered all appropriate measures in the design, construction, and operation phases to minimise the acoustic impact of the wind farm.

8. COMMUNITY BENEFITS feedback

Approximately 67% of respondents provided comments relating to the community benefit package that will become available should Longcroft Wind Farm be consented. As regards to whether RES' unique Local Electricity Discount Scheme (LEDS) should form a part of the tailored community benefits package for Longcroft Wind Farm, 61% responded 'yes', 3% responded 'no' and 17% responded 'maybe'. 19% of respondents didn't respond to this question.

8.1 Example comments

In response to the below question on the comments form, the following comments were received:

Q. Community benefit tends to focus on those Community Council areas closest to the proposal which host the site and/or infrastructure. What are your views on this approach for Longcroft?

- *"It would be good to employ local workers in the delivery of the project."*
- *"Benefit should be focussed on those adversely impacted in proportion to adverse impacts, not on CC boundaries."*
- *"Each household in the catchment of the site should benefit, as well as the communities."*
- *"Seems logical to me."*
- *"It seems right that local residents - and businesses - should benefit as they will have to deal with the upheaval during construction."*

In response to the below question on the comments form, the following suggestions were received:

Q. What ideas, local priorities, or community projects would you like to see benefitting from Longcroft Wind Farm, should it go ahead?

- *"'Rotary club, Lauder in Slam, Lauder Paths Network, Lauder Foodbank, LEDS Please!"*
- *"'Giving out apprenticeships for local people"*
- *"'School children, in particular outdoor learning of Lauder primary school"*
- *"'Local groups and facilities getting support to upgrade their premises"*

8.2 RES response to community benefits feedback

Should the project be consented, a community benefit package will be established to support the communities who host, and are closest to, the project.

RES is proposing a tailored package of benefits for the community from Longcroft Wind Farm that would be worth £5,000 per megawatt (or equivalent) of installed capacity per annum. Based on the current layout design and installed capacity of 125.4MW, this could equate to a tailored community benefit package for the local area worth £627,000 (or equivalent) each year.

We take a tailored approach and consult with the local community, both pre-planning and post-consent (should the project be granted planning permission), to gain an understanding of the local priorities and to seek suggestions for projects that will help to secure long-term economic, social and environmental benefits for the area. This approach ensures the community benefits package that is delivered is aligned with the priorities of the local community, which may involve initiatives that sit outside the parameters of a traditional application-based fund.

This package could include RES' unique Local Electricity Discount Scheme (LEDS), something that has received significant interest from the community as it delivers direct and tangible benefits through offering an annual discount to the electricity bills of those living and working closest to a participating operational wind farm.

Should the project receive consent, the area of benefit for Longcroft Wind Farm will be determined in consultation with locally elected representatives from the closest communities. It is important to note that voluntary community benefits are not a material planning consideration.

RES is also committed to ensuring that, wherever reasonably practicable, local contractors and employees are used in all aspects of wind farm development. Based on the updated design, the Longcroft Wind Farm proposal is predicted to deliver approximately £5.3 million of inward investment to the area in the form of jobs, employment, and use of local services during the development, construction and first year of operation.

9. EXHIBITION and GENERAL PROJECT feedback

RES included a multiple-choice question on the comments form that asked people to what extent they felt they had increased their knowledge of the Longcroft Wind Farm proposal having visited the exhibition. The breakdown of responses is as follows: 64% responded 'quite a lot'; 5% responded 'a lot'; 17% responded 'a little'; 11% responded 'very little'; and 3% responded 'none at all'.

Approximately 30% of respondents provided specific comments on the exhibition events, for example: dissatisfaction with level of project information available; interest in how the project may be modified following consultation; and expertise of project team in attendance.

9.1 RES response to exhibition and general project feedback

We are grateful to everyone who provided feedback on the early stage design at the public exhibition events we held in May 2023 in the local area to engage with people on the proposal (and during the subsequent consultation period).

The purpose of this final suite of public exhibitions is to provide people with an opportunity to review the updated 19 wind turbine layout design, speak with the project team and ask any questions. Whilst the layout design is almost finalised, these events provide people with a further opportunity to submit written feedback again to RES on the updated layout design.

As well as updated layout design, infrastructure and constraints drawings, we have provided more information on aspects such as the on-site substation, grid connection, and proposed battery energy storage system (BESS).

Since the wind farm proposal first became public in March 2023, we have undertaken an extensive amount of technical and environmental site survey work. We have also considered feedback from a wide range of key consultees on the proposal including local Community Councils and Scottish Borders Council.

We are now at a stage where most of the site survey work is complete, the updated 19 wind turbine layout design is being refined and finalised, and the Environmental Impact Assessment (an extensive document which will accompany the planning application) is underway.

A Pre-Application Consultation (PAC) Report will also accompany the planning application submission. The report will summarise the exhibition events, communications activity that has been undertaken on the project and consultation feedback received.

Once the proposal is submitted into planning there will be an opportunity to submit formal comments on the proposal to the determining authority. The Scottish Government's Energy Consents Unit will hold a statutory consultation period whereupon members of the public, as well as statutory consultees, can submit their formal comments on the proposal. These representations will then be assessed against the proposal and a planning decision made by the determining authority in due course.

A copy of the key information presented at this exhibition, including an indicative timeline of the steps required to go through the planning process up to when the wind farm is expected to reach full operation, if consented, can also be found on the website at www.longcroft-windfarm.co.uk together with contact details for the project team.