



Briefing document on Scoop Hill Wind Farm Application (ECU Reference 00000533)

Save Our Hills Moffat (SOHM), a constituted group which believes that while wind energy is an important part of the renewable energy mix, the proliferation of windfarms in Dumfries and Galloway is in danger of overwhelming the countryside, changing our horizons and leaving a legacy of consequences that were never envisaged.

Here for your consideration is a list in summary format of aspects of the Scoop Hill application which we feel bear detailed scrutiny. We are currently drafting a detailed objection for the attention of Scottish Ministers which expands on each point.

1. Landscape
2. Cumulative issues
3. Visibility
4. Moffat – a Conservation Town
5. Dark Sky Status
6. Golden Eagles
7. Tourism
8. Socioeconomic issues
9. Aviation

Below a brief background is given to these points.

1. Landscape

The location of Scoop Hill does not comply with DGC Local Development Plan 2 and its Supplementary Guidance. **It is questionable whether all the turbines are**

indeed, as asserted by CWL, situated in areas identified as potential for wind farm development.

2. Cumulative issues

Within section 3.4.4 of Part 1 Wind Energy Development: Development Management Considerations Appendix “C” published February 2020S, it states:-

“Additional wind farm development sited on the outer edges of both the Ae Foothills with Forest (18a) and the Annandale Foothills (18) would exacerbate the prominence of operational wind farms already affecting immediate skylines seen from nearby lower-lying well-settled landscapes including Nithsdale and Annandale. The creation of a corridor-effect of wind farms sited on either side of Annandale, particularly where this dale narrows in the north and where the Harestanes and Minnygap wind farms are more visible. This would extend the dominant effect of the Clyde wind farm experienced from major transport routes and settlement to the north. It is concluded that there is only very limited scope for additional wind energy development in this area.....”

If we add to this mix the Daer Wind Farm application and the latest Rivox proposal, Moffat risks being totally surrounded by wind turbines in the next few years.

3. Visibility

The height of the highest proposed turbines (at a scale previously only used offshore) mean that many will exceed the heights of the highest surrounding hills which form the current skyline ridge, thereby diminishing their prominence in favour of man-made, industrial-scale infrastructure.

The viewpoint photomontages provided by the developer whilst helpful, do not include two views which could be considered of high importance in Moffat, namely:

- The main approach to the town on exiting the M74, in the direction of the nature reserve
- The view from the Camping and Caravanning Club site.

These are both views which will impact highly on visitors to the town. **It is recommended that photomontages of these two viewpoints should be requested.**

4. Moffat – a Conservation Town

Moffat Community Council commissioned the Moffat Conservation Area Character Appraisal and Management Plan (CACAMP) back in 2019. This document confirms our status not only as an outstanding conservation town but, with the CACAMP being an independent evaluation and confirmation of the extraordinary built and natural heritage of the region, its evaluation clearly demonstrates why the town should be given special status when considering this planning application.

A draft response from DGC's Built Heritage Policy Officer does itself draw on the Moffat CACAMP and states:

"The origins of Moffat Conservation Area and the purpose and character of its buildings contribute to its cultural significance but these are closely bound up with its setting and the local geography – topography, geology and hydrogeology. There are several wells and springs in the surrounding hills which have contributed to the appeal to tourists over at least two centuries."

It goes on to say:

"Viewpoint 9, Moffat High Street

Shows that from various positions in the Conservation Area that between 1 and 45 turbines will be in the view. The central street of the Conservation Area (CA) is High Street and although the red point obscures part of the colour coded system it appears to me that between 16 and 45 turbines will be in the view to the south-east. The streets in some cases channel this view and it will be a significant change from the tranquil setting of the CA which has been clearly demonstrated in the Moffat CACAMP.

*The photomontage clearly indicates that between 10 and 14 very large turbines would be dominant in the views from the southerly part of High Street **which would be a significant change to the setting of the conservation area and impact on the tranquillity of the views out of it.***

5. Dark Sky Status

DGC Built Heritage Officer makes reference to the Dark Sky Status the town currently enjoys (itself the result of five years of hard work by the Moffat Astronomy Club). The draft response states unequivocally:

"The proposed aviation lighting would also impact on the setting of the conservation area, within the dark skies town of Moffat, after dark."

"In relation to the future visibility after planned tree felling it continues:

"the visual impact will increase with many more turbines coming into the view. In addition, this may amplify the number of aviation lights that would be visible on the approaches to the dark skies town. I consider that this should be more fully assessed."

Moffat Astronomy Club feels that "the current proposals will have unacceptable negative impact on the club's ability to observe the night sky to the South East of their recently built observatory. They will also affect Moffat's international status as a dark sky town with a consequential knock on effect on tourism - the very life blood of the town."

Concern needs to be addressed to the fact that the radar activated lighting, proffered by the developer as a potential mitigation, has not yet been passed

by the Civil Aviation Authority and will require legislative change. CWL does not expect this to happen before 2025. Are we to assume that the developer will construct the turbine lighting under current legislation and retrofit every turbine if legislation changes?

6. South of Scotland Golden Eagles Project

The southern Scotland population of golden eagle is extremely fragile and vulnerable to extinction, emphasised by the undertaking of a multi-million-pound reintroduction project supported by the Scottish Government. The Scoop Hill development directly threatens the aims and success of that project.. RSPB object to this proposal unless substantial changes are made to the design. These changes **would require the removal of 32 turbines.**

Moffat will be the 1st Golden Eagle Town in Scotland. Visit Moffat have been collaborating for three years with the South of Scotland Golden Eagle Project to maximise the marketing and tourism benefits of the reintroduction of this iconic raptor to the Moffat hills. **This proposed wind farm will put the entire project at risk.**

7. Tourism

Already at the Scoping stage of this development in June 2019, VisitScotland stated:

[that it] strongly agrees with the advice of the Scottish Government the importance of tourism impact statements should not be diminished, and that, for each site considered, an independent tourism impact assessment should be carried out. This assessment should be geographically sensitive and should consider the potential impact on any tourism offerings in the vicinity."

No tourism impact assessment has been produced by the developers which takes into account the fact that Moffat is a tourist destination. CWL claim that tourism will not be negatively impacted. However they depend on reports which are outdated and which themselves rest on research carried out as long ago as 2008. During the last five years there has been a proliferation of wind turbines across Scotland and particularly in Dumfries and Galloway. No independent research appears to have taken place during those years. An analysis conducted by Mountaineering Scotland in December 2017 stated:

"It can be cautiously concluded, from the limited evidence available, that wind farms in locally designated landscapes have an adverse impact upon tourism-related employment in their local area. All three wind farms in such areas in this study [Clyde, Glenkerie and Kelburn] lost employment (averaging -7%), compared with a Scottish increase of 15% between 2009 and 2015, and an increase of 35% in the vicinity of wind farms in non-designated areas."

The lack of a Moffat specific Tourism Impact Assessment should be requested from CWL.

In their application documents CWL rely heavily on “conclusions” drawn from Biggar Economics ‘Wind Farms and Tourism Trends in Scotland’,¹ Revised Version, . October 2017. However, the Biggar Report has been critiqued by both the John Muir Trust² and Mountaineering Scotland³

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8. Socioeconomic issues

58 family homes will be impacted. CWL have already purchased a property within the footprint of the wind farm and have declared that this will remain unoccupied for the lifetime of the development. **In a rural area with a recognised housing shortage, can it afford to put 58 properties at risk of detrimental development?**

9. Aviation

The National Air Traffic Service have objected to Scoop Hill on the grounds that the interference with radar will be unacceptable.

Additionally, this part of Scotland is a low flying area. CWL show gross insensitivity to propose so many giant turbines in a low flying area, where many of the residents still remember only too vividly the horror of the Lockerbie disaster and a further accident at Shieldhill, near Lochmaben

[<http://news.bbc.co.uk/1/hi/scotland/994508.stm>]

In this regard, Scoop Hill is the wrong wind farm in the wrong place.

In conclusion, we hope you will see from the brief details above that there are considerable grounds for objection to this application.

If you require more information, please do not hesitate to contact Terence Leigh, Chair, SOHM (dennis.leigh533@gmail.com Tel. 01683 220533 or Carole Williams, Secretary, SOHM (mrsscarolewilliams@gmail.com Tel. 01683 222828).

¹ <https://biggareconomics.co.uk/wp-content/uploads/2020/01/Wind-farms-and-tourism-trends-in-Scotland.pdf>

² <http://www.scottishenergynews.com/john-muir-trust-calls-for-independent-research-as-new-study-casts-doubt-on-wind-farm-and-tourism-report/>

³ <https://www.thecourier.co.uk/fp/news/perth-kinross/247033/mountaineering-council-slams-tourism-wind-farm-study/>

⁴ <https://www.mountaineering.scot/conservation/information/wind-farm-research>