Date:

Energy Consents Unit

Scottish Government

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e-mail: [representations@gov.scot](mailto:representations@gov.scot)

Dear Sirs,

**Scoop Hill Community Wind Farm. (Ref. No.  ECU00000533 )**

**Letter of Objection**

I **wish to object** to the proposed wind farm, which has been submitted under Section 36 of the Electricity Act 1989, for the following reasons:

* Scottish Government Policy

Whilst all reasonable people understand that renewable energy is needed in the UK, this proposal is contrary to Scottish Planning Policy's stated aim *“to achieve the right development in the right place”* – not just at any cost. This would be the biggest on-shore wind farm in the UK (not comparing it to wind farms that have undergone extensions to the original wind farm) both in sheer numbers and the heights of the turbines – the size of many of the turbines are of the height commonly found off-shore and are in stark contrast to the other wind farms within the proposed locale/Dumfries & Galloway Council area. Should the development be permitted it would be akin to an industrial development at odds with this rural area.

* Location

The proposed development, by virtue of its location, its extensive geographical coverage, and the scale and height of the structures, together with associated infrastructure, will adversely impact on the landscape of the Moffat hills, contrary to the provisions of the Local Development Plan (LDP).

Indeed, that LDP states key cumulative effects are likely to be associated with:-

*“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…….”*

* Ornithology

The application site comprises habitat known to be a nesting location for a number of rare protected species of bird in particular the Golden Eagle. The RSPB has stated:

* *“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. This development directly threatens the aims and success of that project.”*
* Recreation

Several long-distance routes/ and paths (used by horseriders, cyclists and walkers alike) lie at the northern end of the proposal. The recreational enjoyment of these routes (including Southern Upland Way and the Reivers Route) will be impacted by this wind farm. Sight lines from high points along these and associated routes, which currently permit unimpeded view through to the Solway coast area and the Lake District, will not be enhanced by having such far-reaching views interrupted by very high turbine towers and blades.

* Conservation and cultural heritage

This wind farm proposal will detract from the approach to and the setting of Moffat town, a designated Conservation Area. Several of the turbines will be highly visible from Moffat High Street and Station Park both of which site buildings of historical interest.

* Long-term employment

It is not convincing that long-term jobs will manifest themselves once the wind farm construction has finished. Rather any servicing which the wind farm requires is more likely to be undertaken by contractors based elsewhere responding to issues flagged by remote monitoring of the facility as per EIA Section 2 para 2.2.3.

* Supporting Scottish industry

CWL expresses laudable commitment to a “Buy Scottish” policy however it is unclear that the turbines themselves will be Scottish-industry sourced as currently there appear to be no Scottish manufacturers of the intended very large typology turbines.

* Flooding risks

Flood risk has been identified within the EIA, but only generic mitigation measures suggested. Mitigation measures will only be considered once planning permission is given.

Flooding at the proposed river crossing is considered to be high risk.

Flooding downstream of the development is currently already high risk and the EIA states that the development could exacerbate the likelihood of flooding. The flood area includes residential areas, farmland, roads and the national rail network. Additionally, it is felt that the damage to peat, trees and vegetation which currently slow the progress of water will have added detrimental effects.

* Lighting of turbines

As none of the turbines are less than 150m high aviation lighting will be a requirement for ALL of the turbines. It is to be hoped that when this aspect is considered during the determination process that a decision is made on the basis of the best available technology available at that time rather than on the basis of some technological aspiration/hardware/software mitigation which is unproven.

The visual impact of night aviation lighting on the character of this rural landscape (many of the settlements/villages in the locale have no street lighting), from both near and far, with the loss of areas where the absence of light pollution from any source contributes to the night time character, the sense of remoteness or appreciation of the night sky. This has a potentially adverse visual effect on the dark night-time rural environment.

The required night lighting will imbue the area with an industrial appearance and render the wind farm visible from a great distance.

* Wind theft

Wind theft’ has not been considered and this is a fundamental flaw in both the application and Scottish Government policy. It is recognised in the international scientific community that wind farms in relative close proximity could significantly impact on turbine efficiency. It is reported that wind farms generate wakes ‘characterised by a reduction in mean wind speed and an increase in small-scale turbulence. These wakes have the potential to disrupt the operation of adjacent wind farms…’ If the proximity of this proposed development decreases the efficiency and economic viability of existing wind farms and is granted permission, it will have unnecessarily increased the negative impact on natural capital, increased the flood risk and caused a reduction in tourism and therefore local employment. It is therefore clear that ‘wind theft’ should be fully evaluated prior to determination of this application.

* Battery Energy Storage Systems (BESS)

There are also well-authenticated, inherent dangers attached to battery energy storage systems (BESS) using lithium-ion batteries. These do not appear to have received adequate risk assessment.

* Low-flying

The proposed development is close to a military low-flying area used by high speed jet aircraft and Hercules transport planes authorised to fly at levels down to 150ft.

• Precautionary Principle

The proposal disregards the precautionary principle incorporated into the World Charter for Nature in 1982 and adopted by the United Nations General Assembly, which states: ‘When there is reasonable suspicion of harm, decision-makers need to apply precaution and consider the degree of uncertainty that appears from scientific evaluation’ There is a strong prevalent concern that there is insufficient evidence to reach reliable conclusions on the long term effects of large scale windfarms on local and extended weather conditions and also on the effects of infrasound emitted by turbines, which research indicates can induce vertigo, disorientation, nausea and resonances in inner organs such as the heart.

Signed:

Name(s):

Address:

Post code: