



Torfichen Wind Farm Proposal

Report on feedback



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 March 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 March 2023 exhibitions and consultation

RES held two public exhibition events in the local area (North Middleton and Heriot) in March 2023 as part of its pre-application consultation on the proposed Torfichen 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 initial early stage (scoping) design.

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 74 people attended the events and 28 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 Torfichen. The breakdown of responses is as follows: 48% responded as supportive; 26% responded as 'neutral'; 22% responded as 'opposed'; and 4% responded that they didn't like wind farms in general.

RES also included a multiple-choice question that asked if the wind farm went ahead as currently designed (scoping layout), what people thought about the turbine and infrastructure layout. The breakdown of responses is as follows: 36% responded that they had concerns about the proposed layout; 36% responded that they were neutral to the proposed layout; 24% responded that they were happy with the proposed layout; and 4% responded that they didn't like 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. LANDSCAPE and VISUAL feedback

Approximately 43% of respondents provided comments relating to the landscape and visual aspect of the proposal which covered a variety of themes.

2.1 Key themes

The key themes and comments raised within the feedback were:

- **Turbine height:** turbines too big; too visible over wide area; question over the economic viability of smaller turbines.
- **Site location:** will spoil views; visually intrusive for walkers and cyclists; already enough wind farms.
- **Exhibition visualisations:** visualisations were limited; would like wirelines from property.
- **Residential amenity:** site will be visible from local properties; residential amenity will be affected.
- **Aviation lighting:** aviation lighting will cause light pollution.

2.2 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 180m tall wind turbines proposed at Torfichen 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 scoping design) include the reduction in turbine numbers from 19 to 18 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 March 2023 public exhibition events we provided six visualisation boards showing how the proposal may look based on the early scoping design and layout from six 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 six viewpoints to show the updated turbine layout. These viewpoints are among a total of 22 agreed with NatureScot, Midlothian Council and Scottish Borders Council which will be assessed in the application.

The photomontages and wireline visualisations presented at the exhibitions have been prepared to well established and recognised standards set by NatureScot. Noting the interest received in additional viewpoints at the March 2023 public exhibitions, we have provided visualisation software at this final set of exhibitions to further help to give an impression of what the proposal could look like from different viewpoints in the area. This software will provide an opportunity for people visiting the exhibitions to view an image of the updated design from a location of choosing.

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 2km 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 2km have been contacted directly to request access to help inform the findings of the RVAA. In addition, in response to a request at Scoping stage from Heriot Community Council; properties between 2km and 2.5km from the application site will also be assessed in the RVAA using information gathered from publicly accessible areas and combining them into manageable groupings.

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. The findings from the wide range of technical studies and environmental surveys 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.

In accordance with the Air Navigation Order 2016, en-route obstacles at or above 150m, such as the wind turbines proposed at Torfichen 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.

3. ENERGY feedback

Approximately 32% of respondents provided comments relating to types of energy generation and the needs case for onshore wind.

3.1 Key themes

The key themes and comments raised within the feedback were:

- **Offshore wind:** prefer offshore wind to onshore.
- **Cost of electricity:** question over whether developing onshore wind reduces fuel bills.
- **Other technologies:** need a diverse energy supply; would prefer other technologies (hydro, marine) that do not industrialise the countryside.
- **General comments:** no wind, no power.
- **Onshore wind needs case:** agree with need but wind farms need to be designed sensitively; there are enough wind farms.
- **Carbon payback:** would like more information on carbon payback.

3.2 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.

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.

The Torfichen Wind Farm proposal includes a battery energy storage system (BESS) which is anticipated to have a storage capacity akin to the wind farm i.e., a power output capacity of up to 100MW and a storage energy capacity of around 200MWh (megawatt hours). The BESS would help maximise generation capacity and efficiency of the proposal and further contribute to energy security.

Typically, wind farms pay back the carbon within 1-3 years and operate carbon free thereafter. A carbon balance assessment will be provided in the Environmental Impact Assessment Report which will accompany the planning application.

4. ECOLOGY and ORNITHOLOGY feedback

Approximately 11% of respondents provided comments focused on ecology and ornithology.

4.1 Key theme

The key theme raised within the feedback concerned potential impact on wildlife from the wind farm.

4.2 RES response to ecology and ornithology feedback

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.

A wide range of detailed ecological surveys have been undertaken by qualified ecologists as part of the non-avian Ecological Impact Assessment (EclA). The non-avian Ecological Impact Assessment (EclA) survey and assessment work is an extensive undertaking, and the findings will be written up in the coming months as part of a comprehensive Environmental Impact Assessment Report (EIAR), which accompanies the planning application, that Scottish ministers will take into account when deciding whether or not to grant consent for the project. The planning application and associated documents such as the EclA 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 Midlothian Council, NatureScot, RSPB Scotland, and the Forth District Salmon Fishery Board with regard to designated sites, protected areas and protected species.

A wide range of ecological and ornithological studies have been undertaken as part of the Environmental Impact Assessment work and we are also developing an outline Habitat Management Plan for the site.

5. ACOUSTICS feedback

Approximately 11% of respondents provided comments focused on acoustics.

5.1 Key theme

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

5.2 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 Midlothian Council, the Scottish Government and the UK Institute of Acoustics.

In consultation with Midlothian 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.

6. CONSTRUCTION feedback

Approximately 36% of respondents provided comments focused on construction.

6.1 Key themes

The key themes and comments raised within the feedback were:

- **Access route:** proposed route for turbine deliveries is acceptable.
- **General comments:** general concerns about potential road damage; impact on private water supplies.

6.2 RES response to construction feedback

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 Midlothian 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 has collected Private Water Supply (PWS) data from Midlothian Council to establish the PWS source locations and source types in order to inform the PWS assessment that will be presented in the EIAR. The findings of the assessment will inform what further work would be required, if any, which may include baseline monitoring of relevant PWS, before, during and after construction. Any work associated with PWS post consent will be enforced through planning condition and subject to agreement with Midlothian Council.

At the first set of public exhibitions we held in March 2023, some residents raised concerns regarding the durability of a cast iron private water main adjacent to the B7007, stating that it had previously been damaged by heavy-goods vehicles. RES contacted the owner of the land which accommodates the private

water main, and were advised that it was replaced with a sturdier alkathene main which has resolved the issue.

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.

7. COMMUNITY BENEFITS feedback

Approximately 75% of respondents provided comments relating to the community benefit package that will become available should Torfichen 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 Torfichen Wind Farm, 73% responded 'yes', 4% responded 'no' and 23% responded 'maybe'.

7.1 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 Torfichen?

- *"It would be a good thing to benefit the local community council."*
- *"The community council is probably best placed to propose how such benefits best utilised."*
- *"As Heriot already gets quite a lot of wind farm money, I would be quite happy for the communities that are further away to get some of the money."*
- *"Agree to benefit those closest on views disrupted most."*

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 Torfichen Wind Farm, should it go ahead?

- *"Local group funding"*
- *"Support for local services"*
- *"Help for public transport improvements"*
- *"EV charging points"*
- *"Village hall extension"*
- *"Cheaper electricity bills"*
- *"Planting trees. Encouraging wildlife."*
- *"Tennis courts / Astro pitch"*

7.2 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 Torfichen 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 108MW this could equate to a tailored community benefit package for the local area worth £540,000 (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 Torfichen 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 Torfichen Wind Farm proposal

is predicted to deliver approximately £5 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.

8. 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 Torfichen Wind Farm proposal having visited the exhibition. The breakdown of responses is as follows: 59% responded 'quite a lot'; 19% responded 'a lot'; 18% responded 'a little'; and 4% responded 'very little'.

Approximately 25% of respondents provided specific comments on the exhibition events, for example: more detail on potential visibility of wind farm from the surrounding area; ability of RES staff to answer questions at this stage in the development process; further information on grid connection; and request for project timescales through to construction and operation.

8.1 RES response to exhibition and general project feedback

We are grateful to everyone who provided feedback on our early scoping design at the public exhibition events we held in March 2023 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 18 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.

In response to requests for additional viewpoints in the area, we have provided visualisation software at this final set of exhibitions to enable visitors to view an image of the updated design from a location of choosing. As well as updated layout design, infrastructure and constraints drawings, there is also more information on aspects such as the on-site substation, grid connection, and proposed battery energy storage system (BESS).

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 Torfichen 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 Torfichen Wind Farm.

Since the wind farm proposal first became public in January 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 Midlothian Council.

We are now at a stage where most of the site survey work is complete, the updated 18 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.torfichen-windfarm.co.uk together with contact details for the project team.