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Our ref: CNS/REN/WF/LW
Your ref: ECU00004619

15 July 2024

Dear Sir

**The Electricity Works (Environmental Impact Assessment) (Scotland) Regulations 2017
Electricity Act 1989 Section 36 and Schedule 8:
Application for Leithenwater Wind Energy Hub**

Thank you for consulting NatureScot on the application and supporting Environmental Impact Assessment Report (EIA Report) for the Leithenwater Wind Energy Hub, Scottish Borders, and for the time extension.

Our advice is based on the EIA Report prepared by LUC on behalf of Leithenwater Wind Energy Hub Limited for Belltown Power, dated April 2024.

The Proposal

This wind farm would comprise up to 13 wind turbines up to 200 metres to blade tip, battery storage facilities and associated infrastructure, with an operational life of 40 years. A new junction on the B709 would be required to facilitate abnormal load vehicle access. The site is located to the north-east of Peebles and north of Innerleithen. Current land use comprises commercial forestry, open moorland and grassland grazed by livestock.

NatureScot Position: Advice

We provide advice in relation to the key natural heritage interests associated with the proposal, including effects on the River Tweed Special Area of Conservation (SAC), and Upper Tweeddale National Scenic Area (NSA).

We also provide advice on the River Tweed SSSI, Moorfoot Hills SAC and SSSI, Gladhouse Reservoir Special Protection Area (SPA), Fala Flow SPA, Westwater SPA and on golden eagle.

Summary of Advice

River Tweed SAC

This proposal and the associated works required to the delivery access route could be progressed without any modification. However, because it could affect internationally important natural

heritage interests of the River Tweed SAC, Scottish Government, as competent authority, must establish that the proposal, as applied for, will not adversely affect the integrity of the site. We provide our appraisal below to help with this.

Moorfoot Hills SAC

In our view, there is no likely significant effect of the proposed development itself on the blanket bog or dry heath qualifying interests of this SAC, either directly or indirectly.

In addition, where the minor road widening works that would be required along the delivery route to facilitate access of turbine components to the proposed site are located within the SAC, it is our view that there is no likely significant effect on the qualifying interests of the SAC, either directly or indirectly. An appropriate assessment is not required.

Gladhouse Reservoir SPA, Fala Flow SPA and Westwater SPA

In our view, there is no likely significant effect of the proposal on the non-breeding pink footed geese qualifying interests of these SPAs, either directly or indirectly. An appropriate assessment is not required.

River Tweed Site of Special Scientific Interest (SSSI)

Embedded mitigation measures to address potential impacts on the qualifying interests of the River Tweed SAC will also address those on the notified features of the SSSI.

Moorfoot Hills SSSI

We consider it unlikely that the proposal - the development itself and the road widening works required along the B7007 and B709 - will affect the blanket bog, upland habitat assemblage, breeding bird assemblage and breeding golden plover notified interests of this upland SSSI.

Upper Tweeddale NSA

We consider that the introduction of the proposed development would have some significant adverse effects on the Special Landscape Qualities (SLQs) of the Upper Tweeddale NSA but would not compromise the objectives of the designation or its overall integrity.

Golden Eagle

There is an occupied golden eagle territory close to the site of this proposed development, established by a pair of birds associated with the work of the South of Scotland Golden Eagle Project, whose aim is to prevent the extinction of this raptor from Southern Scotland.

This is significant in Natural Heritage Zone (NHZ) terms, considering the low numbers of breeding birds currently in NHZ 20 - Border Hills, and in Southern Scotland overall.

On the basis of the information presented in the application, it is our view that golden eagle are unlikely to be significantly affected by this proposed development.

Appraisal of the Natural Heritage Impacts of the Proposal

River Tweed SAC

The River Tweed SAC is of international interest for the qualifying interests Atlantic salmon, otter, three species of lamprey and as a water course typically supporting water crowfoot (*Ranunculus*) species. The qualifying interests are sensitive to direct and indirect effects

including disturbance to the river habitat, silt and sediment entering the watercourse and smothering gravel beds, suspended solids in the water column, pollution events, and changes in water quality and in water chemistry. Further information on this is given in the SNH publication *'Guidance for Competent Authorities when dealing with proposals affecting SAC freshwater sites'*.

All watercourses within the site flow directly into the Leithenwater, part of the River Tweed SAC.

In our view, this proposal is likely to have a significant effect on the qualifying interests of the River Tweed SAC. Consequently, Scottish Government, as competent authority, is required to carry out an appropriate assessment in view of the site's conservation objectives for its qualifying interests. We advise that, if the proposal is undertaken strictly in accordance with the application, then the proposal will not adversely affect the integrity of the site.

In reaching this view we have taken into account embedded mitigation measures proposed, including the Construction and Environmental Management Plan (CEMP) to be incorporated into the Construction Method Statement (CMS) to minimise the risk of impacts on the species and habitats for which the River Tweed SAC is designated. This will be worked up into a comprehensive CEMP with its implementation and monitoring during construction of the wind farm overseen by an Ecological Clerk of Works (ECoW).

The final CEMP should be in accordance with SEPA guidance (available on the [SEPA website](#)). It must include site specific measures to ensure there is minimal disturbance of the qualifying features, and protect against adverse indirect impacts on important ecological requirements such as on water quality, water flow and/or river channel substrate.

Please note that we do not wish to be consulted on the detailed CEMP; we are content that the planning authority ascertain that this is adequate, with advice from SEPA if necessary.

Our appraisal of the impacts of the proposal on the qualifying interests of the River Tweed SAC is set out in Appendix 1.

Moorfoot Hills SAC

We consider there is no connectivity between the wind farm site and the qualifying interests of this SAC. The boundary of this site is a fence line on the ridge between the SAC and the proposed development site. Since the built elements of the wind farm sit below this ridge line, and not within the SAC, we do not consider there to be any obvious processes or pathways by which the proposal could influence them.

However, we note at 9.8.11 in Chapter 9 Hydrology, Geology & Hydrogeology that the desk-based assessment for the access route to the site highlights a section of the delivery route along the B7007 and B709 falls within the Moorfoot Hills SAC/SSSI. The assessment has identified five pinch points where work is likely to be required to allow the Abnormal Indivisible Load (AIL) to pass. It would only be where extensive road widening is proposed that there could be connectivity with the qualifying interests of the SAC, depending on the habitats found at that location, topography and the nature of the works. Generally, we would not be concerned about minor works that are contained within the road verges immediately alongside the carriageway.

From Figure 12.2 Proposed AIL Delivery Route we have identified the pinch points concerned as 23, 24, 25, 26 and 27, then used Appendix 12.1 Abnormal Indivisible Load Access Assessment to work out what is proposed:

- PP23 – SAC/SSSI bounds the east of the carriageway only; the work required is on land to the west of the carriageway, which is not within the SAC/SSSI. This area is downslope of the SAC, so no connectivity with the SAC habitats.

- PP24 – within the SAC/SSSI; the work required is within the carriageway verge, is minor and not of concern.
- PP25 - SAC/SSSI bounds the east of the carriageway only; the work required is on land to the west of the carriageway, which is not within the SAC/SSSI. The topography east of the road suggests that any work on land to the west would not affect the SAC habitats indirectly.
- PP26 - within the SAC/SSSI; no work is proposed.
- PP27 – two sections nearest PP26 are within the SAC/SSSI; results from desk-based assessment inconclusive, but likely to only require minor work within the carriageway verge, and not of concern.

Aspects of the work required at each Pinch Point may need to be considered in greater detail post-consent, as per the recommendations at A12.1.6 in Appendix 12.1, and NatureScot may need to be included, given the SAC/SSSI status of the land.

Gladhouse Reservoir SPA, Fala Flow SPA and Westwater SPA

Although there is potential for connectivity between the proposed wind farm site and the pink footed geese qualifying interests of these SPAs, due the distances of up to 20km that geese can fly from their winter roost to their feeding grounds, there is sufficient information available in the public domain about their movement patterns for us to advise that the development is not likely to have a significant effect on the qualifying interest of the SPAs.

Moorfoot Hills SSSI

The nationally important notified features of this extensive upland SSSI are blanket bog, upland habitat assemblage, upland breeding bird assemblage, and breeding golden plover.

There are no obvious processes or pathways by which the development itself could influence the notified habitats of the SSSI. However, road widening at pinch points along the access route to the site could result in loss of SSSI habitat alongside the minor roads within the SSSI, the significance of which will depend on the nature and extent of the habitat lost. We may need to be included in discussions about this post-consent.

We consider it unlikely that the proposal would affect the breeding bird assemblage and breeding golden plover features, since the species comprising these features are found throughout this extensive upland SSSI, and the wind farm site borders a relatively small proportion of it.

Ornithology including Golden Eagle

The results of the surveys carried out are as expected for this upland site under its current use and land management practices. We note the assessments carried out and conclusions drawn.

Our appraisal of impacts on golden eagle is presented in Appendix 2.

Landscape and Visual Impacts

The proposal would bring large scale wind farm development in closer proximity to the Upper Tweeddale NSA south of operational Bowbeat Wind Farm. On its own we consider this would include a non-localised significant adverse effect on SLQ4 *‘Expansive, open hills with panoramic views’*, where the proposed development would become a dominant focal point in northward looking views from elevated positions. Localised significant adverse effects are anticipated on SLQ1 *‘Diverse scenery of great charm and soft beauty’*, and SLQ3 *‘Green, intimate pastoral valleys’*, where the proposed development would impinge on these qualities experienced from the top of the Manor and Tweed valleys.

Cumulatively we consider that the addition of the proposed development to a scenario that would include Cloich Forest Wind Farm would result in a non-localised significant adverse cumulative effect on SLQ4 '*Expansive, open hills with panoramic views*'.

Our appraisal is given in Appendix 3.

Ecology

The results of the habitat and species surveys carried out are as expected for this upland site under its current use and land management practices. We note the assessments carried out and conclusions drawn.

We support the intention to produce and implement a Construction and Environmental Management Plan (CEMP), to include relevant Species Protection Plans (SPPs) and Construction Method Statements (CMS) together with the use of an Environmental Clerk of Works (ECOW) during enabling works and throughout the construction period of the Proposed Development.

Bats

To reduce the operational effects on bats we advise that mitigation during operation is put in place. Our guidance *Bats and onshore wind turbines – survey, assessment and mitigation (August 2021)* gives details of two forms of turbine manipulation: reduced rotation speed while idling, and curtailment.

Forestry

We note that felling of commercial forestry would be required to facilitate the proposed development, and that compensatory planting of the net area of woodland lost (approximately 40.87 ha) would be agreed with Scottish Forestry. We recommend that all compensatory planting is of native species, to promote biodiversity.

Outline Habitat Management Plan

An Outline Restoration Enhancement Plan (OREP) is presented in the EIA Report. We support all the measures proposed, except for in channel enhancement of the Leither Water, which should be avoided, unless discussed and agreed with the Tweed Foundation, ourselves and SEPA.

We trust this response is useful.

Please contact this office should you wish to discuss our response.

This advice is provided by NatureScot, the operating name of Scottish Natural Heritage.

Yours faithfully

By e-mail

Anne Brown

National Operations Officer - South

APPENDIX 1 TO NATURESCOT RESPONSE
LEITHENWATER WIND ENERGY HUB S36 ELECTRICITY ACT APPLICATION
NATURESCOT APPRAISAL - RIVER TWEED SPECIAL AREA OF CONSERVATION

Our consideration of the three tests as defined in the Habitats Regulations is as follows:

1. Is the plan or project directly connected with or necessary to site management for nature conservation management purposes (and part of a fully assessed and agreed management programme)?

In our view, this proposed development is not necessary for conservation management purposes. Hence, further consideration is required

2. Is the plan or project likely to have a significant effect on the site?

Our advice is that this proposal is likely to have a significant effect on the qualifying interests of the River Tweed SAC. There is hydrological connectivity between the development site and the River Tweed SAC through watercourses on the site that flow directly into the Leithen Water, part of the River Tweed SAC.

Consequently, Scottish Government, as competent authority, is required to carry out an appropriate assessment in view of the site's conservation objectives for its qualifying interests. These are contained within the Conservation Advice Package.

3. Can it be ascertained that the plan or project will not adversely affect the integrity of the site?

We advise that, if the proposal is undertaken strictly in accordance with the application, then the proposal will not adversely affect the integrity of the site.

The appraisal we carried out considered the following:

- *Supporting habitat for the qualifying species:* the standard mitigation measures ensure that there will be minimal indirect disturbance of the species' supporting habitat.
- *Water quality:* the qualifying features require good water quality and the mitigation measures ensure that construction will not lead to a deterioration in water quality that would affect the qualifying features.
- *River flow:* the mitigation measures will not lead to changes in water depth or water flow that would otherwise risk adversely affecting the qualifying features.
- *Channel form and substrate:* the mitigation measures will ensure that the channel's morphological diversity and substrate composition will not be adversely affected. The natural functioning and morphology of the river channel are key elements supporting the species' habitat.

Our appraisal for each of the qualifying interests is set out below.

Atlantic salmon

- Salmonids are thought to be absent from the upper reaches of the Leithen Water where it flows through the block of commercial forestry, and to be present once the watercourse enters the open moorland and grassland area of the development site.
- Atlantic salmon are sensitive to disturbance to the river habitat, including silt and sediment entering the watercourse and smothering gravel beds, suspended solids in the water column,

pollution events, and changes in water quality and in water chemistry, particularly during the construction phase of this type of development.

- There is a risk that construction-related pollution from the development could affect the SAC Atlantic salmon qualifying interest by affecting the fish themselves and also through deterioration of their supporting habitat, potentially undermining one or more of the site's conservation objectives.
- Implementation and monitoring of the Construction Environment Management Plan (CEMP) will reduce the risk of pollution and siltation impacts.
- The conservation objectives will not be undermined for salmon.

Brook lamprey, river lamprey and sea lamprey

- Although no surveys for lamprey were undertaken, habitats required by these fish are present along the Leithen Water, and it should be assumed they are present.
- Lamprey require similar spawning gravels to salmonids and good water quality, but they also require silty areas in which to grow as juveniles.
- Given hydrological connectivity, construction-related pollution from the development could potentially affect the lamprey qualifying interests of the SAC, by affecting the fish themselves and also through deterioration of their supporting habitat. These impacts could undermine one or more of the site's conservation objectives.
- Implementation and monitoring of the CEMP will reduce the risk of pollution and siltation impacts.
- The conservation objectives will not be undermined for lamprey.

Otter

- Evidence of otter was recorded along the Leithen Water in the form of spraints. Otter are widespread in the River Tweed catchment, and so it can be expected that they forage and commute along watercourses within the site and also use nearby watercourses.
- Minor development related effects on otter could occur, but are considered unlikely to be significant with the implementation of standard mitigation measures, as given on our website.
- Implementation and monitoring of the CEMP will reduce the risk of impacts on otter.
- We conclude that conservation objectives will not be undermined for otter.

Rivers with water-crowfoot dominated floating vegetation

- This habitat was not recorded within the site boundary. Floating beds of water-crowfoot are of particular importance on the lower parts of the river.
- In theory, siltation and/or pollution arising from construction-related work could affect this habitat type but, given the probable distances between the development site and the main areas of this habitat type, significant effects are unlikely.
- Implementation and monitoring of the CEMP will reduce the risk of indirect pollution and siltation impacts.
- The conservation objectives will not be undermined for this qualifying interest.

APPENDIX 2 TO NATURESCOT RESPONSE

LEITHENWATER WIND ENERGY HUB S36 ELECTRICITY ACT APPLICATION

GOLDEN EAGLE

The eagle pair relevant to this case settled in 2021, with subsequent breeding attempts in the following summers at two different nest locations: one in the proposed Scawd Law development area (2022), and one more recently to the east of the proposed Leithenwater development (2023&2024). So far, they have been unsuccessful, but the birds are still relatively young.

The majority of the turbines for the Leithenwater development are proposed to the north of the site within commercial forestry.

The VP surveys were conducted Sept 20-Aug 22, with additional golden eagle focal watches Sept-Mar 21/22 and Nov-Mar 22/23. The breeding season VP data show minimal eagle activity (Figs 8.6 & 8.7), whilst the non-breeding season shows use particularly on the southern part of the site, and to the east (Figs 8.4 & 8.5). The focal watches (Fig 8.8) show activity to the east of the site only. The satellite tag data presented is from Aug 21-Sept 23 for the resident pair (Confidential Fig 2) and Jan19-Sept 23 for non-residents (Confidential Fig 3). These tag data broadly show resident use of land to the east and north-east of the site, with some roost fixes on site, and some use of the site by non-residents, but the pattern of their use shifting north once the territory was established. From the Scawd Law report, satellite tag data from the pair up until Aug 22 showed the range to lie east of Leithenwater east/south-east to Scawd Law. The satellite tag data do seem to show avoidance of the existing Bowbeat Wind Farm to the north of Leithenwater. The GET model (Appendix A Fig 1) shows that the Leithenwater site is predicted to be used by eagles (6+). However, the satellite tag and VP data show limited use of the site, little to the west of it, and predicted suitable eagle habitat is abundant around the site. Three roost sites within the site were identified, likely for the resident birds (two in forestry which is due to be felled in 2025); overall these were used on 16 nights between Aug 21-Sept 23 (Appendix 8.1, 4.16). The estimated collision risk is 0.13 golden eagles/yr (or 5.2 over 40 years; 8.149). The Leithenwater nest site is over 1.2km from any infrastructure (8.96).

Overall, we consider many of the arguments in the ES are reasonable – that the resident eagles are not making much use of the site (a large proportion of which is closed canopy mature commercial forestry, unsuitable for eagle foraging), are not often crossing it to get to the west, and that the nest site is outwith disturbance range. We would agree that the collision risk is likely to be overestimated given displacement is increasingly shown to be the main impact of windfarms on golden eagles, and that the at-risk flight data used were unlikely to relate to the resident pair (non-residents are less likely to use the area now a territory has been established). The three identified roost sites for the resident pair are also not used to an extent to suggest they are functionally important currently, and the north of the site will continue to be used for forestry.

On the basis of the information presented therefore, we consider the Leithenwater nest site and territory use in relation to foraging are unlikely to be significantly affected by this development. However, displacement and collision are not entirely mutually exclusive, so there may be some lower collision risk to the resident pair, given they are currently coming onto the site to roost on occasion. While the full 0.13 birds/yr collision rate is unlikely to be realised, birds may be killed at a lower level. There are many variables that will affect this risk e.g. how the use of roosts may change over time with the rotational forest plan, and with how the pair use the territory with alternate nests sites and the progression of other developments in this area (e.g. Scawd Law). However, this potential lower level of collision risk will probably not have a population level impact.

APPENDIX 3 TO NATURESCOT RESPONSE
LEITHENWATER WIND ENERGY HUB S36 ELECTRICITY ACT APPLICATION
LANDSCAPE AND VISUAL EFFECTS – UPPER TWEEDDALE NATIONAL SCENIC AREA

Summary of advice

We consider that the introduction of the proposed development would have some significant adverse effects on the Special Landscape Qualities (SLQs) of the Upper Tweeddale National Scenic Area (NSA) but would not compromise the objectives of the designation or its overall integrity.

The proposal would bring large scale wind farm development in closer proximity to the Upper Tweeddale NSA south of operational Bowbeat Wind Farm. On its own we consider this would include a non-localised significant adverse effect on SLQ4 *‘Expansive, open hills with panoramic views’*, where the proposed development would become a dominant focal point in northward looking views from elevated positions. Localised significant adverse effects are anticipated on SLQ1 *‘Diverse scenery of great charm and soft beauty’*, and SLQ3 *‘Green, intimate pastoral valleys’*, where the proposed development would impinge on these qualities experienced from the top of the Manor and Tweed valleys.

Cumulatively we consider that the addition of the proposed development to a scenario that would include Cloich Forest Wind Farm would result in a non-localised significant adverse cumulative effect on SLQ4 *‘Expansive, open hills with panoramic views’*.

1 The Proposal

The proposed development would comprise 13 turbines to a maximum 200 m blade tip height, associated turbine compound areas, permanent anemometer mast up to 122.5 m in height, on-site tracks, battery storage system, onsite substation, forest felling / restocking and habitat management provision. Access to the proposed development would be from the B709. Approximately 15 km of new and upgraded access tracks would be constructed. The proposed development would provide capacity of greater than 50MW of installed capacity and is therefore considered to be a national development. As the turbines would be over 150 m in height visible aviation lighting would be required.

The proposed development would be located within an area of afforested upland plateau and moorland in the Scottish Borders north of Glentress Forest, approximately 4.5 km northeast of Peebles and approximately 5.9 km northeast of the Upper Tweeddale NSA.

2 Focus of this advice – Special Landscape Qualities (SLQs) of the Upper Tweeddale NSA

This advice focuses on the potential for significant adverse effects on the SLQs of the Upper Tweeddale NSA¹. National Planning Framework 4 (NPF4)² states that under Policy 4 c) Development proposals that will affect a National Park, National Scenic Area, Site of Special Scientific Interest or a National Nature Reserve will only be supported where:

“i. The objectives of designation and the overall integrity of the areas will not be compromised; or

¹ Scottish Natural Heritage (2010) Commissioned Report No. 374 The Special Landscape Qualities of the National Scenic Areas

² Scottish Government (2023) National Planning Framework 4

ii. Any significant adverse effects on the qualities for which the area has been designated are clearly outweighed by social, environmental or economic benefits of national importance”.

The Upper Tweeddale NSA is one of the smaller NSAs in Scotland and one of only two NSAs in the Scottish Borders valued for a notable composition of intimate valleys, open rounded hills with panoramic views and remains of ancient occupancy. Key routes which form an important part of the experience of the Upper Tweeddale NSA include the John Buchan Way, Peebles cycle trail, Innerleithen cycle trail and Scottish Borders Core Paths. Popular hills include, but are not limited to, Stob Law 476 m above ordnance datum (AOD), part of the Dun Rig range south of Peebles and Trahenna Hill 549 m AOD, part of the Broughton Heights east of Broughton village.

3 Leithenwater Wind Energy Hub and the Assessment Baseline

The site is located across afforested upland hills and open moorland at the south western edge of the Moorfoot Hills which forms part of the backdrop to the Tweed Valley to the south.

The high sensitivity of much of the immediate and wider landscape is acknowledged by the Upper Tweeddale NSA approximately 5.9 km southwest of the site, and Scottish Borders Council locally designated Local Landscape Areas (LLAs) in closer proximity. LLAs closest to the site include the Tweed Valley which abuts the sites’ southern border, the Gladhouse Reservoir and Moorfoot Scarp approximately 0.9 km north of the site, and the Tweedsmuir Uplands 5.3 km to the south of the site. LLAs the Tweed Valley and Tweedsmuir wrap around the northeastern, southern and western sides of the Upper Tweeddale NSA.

The closest operational wind farm Bowbeat (24 turbines with a blade tip height of 80 m) lies directly north of the site and is located approximately 7.4 km northeast of the Upper Tweeddale NSA. While visible in some northward looking views from within the northeastern part of the Upper Tweeddale NSA Bowbeat where visible is largely seen as a distant feature and does not significantly affect SLQs of the NSA. There are no apparent wind farms with aviation lighting close to the NSA.

In planning wind farms closest to the proposed development with potential for cumulative effects on the Upper Tweeddale NSA include Cloich Forest Wind Farm (12 turbines, up to 149.9 m blade tip height), approximately 2.3 km north of the NSA, and Scawd Law (8 turbines up to 180 m blade tip height, including aviation lighting), approximately 11 km north of the NSA.

4 The applicant’s assessment of the effects on SLQs of the Upper Tweeddale NSA

The applicant has provided an assessment of the effects on the SLQs (AESLQ) of the Upper Tweeddale NSA which follows our draft SLQ Assessment³. The applicant identifies significant and adverse effects on SLQ4 *‘Expansive, open hills with panoramic views’*. While we agree with this conclusion, we consider that the applicants assessment underplays the significance of effects on other SLQs.

5 NatureScot’s appraisal of effects on SLQs of the Upper Tweeddale NSA

SLQ2 *‘The historical continuity of settlement’* and SLQ4 *‘Expansive, open hills with panoramic views’*

³ NatureScot (2018) Draft Guidance for Assessing the Effects on Special Landscape Qualities

While Bowbeat Wind Farm is already visible from a number of summits within the Upper Tweeddale NSA the proposed development would either be seen to extend the presence of wind farm development southeast or in front of Bowbeat. However, given the notable difference in height and horizontal spread the proposed development would become the dominant man-made focal point seen in views looking northward against the skyline formed by the southern Moorfoot Hills. Visibility and influence of the proposed development would be experienced across a large number of slopes and summits within the Upper Tweeddale NSA where *'vast, open, windswept, inspiring, exhilarating, and rewarding'* aspects of SLQ4 are well expressed as shown by Viewpoints 13/AESQ1: Cademuir Hill Fort, 15/AESQ1: Stob Law and 19/AESLQ4: Trahenna Hill.

The proposed development would notably affect the northward looking experience of SLQ4, characterised by *'360 panoramic view across the Southern Uplands'*. We consider that to a lesser extent SLQ2 would also be affected where the proposed development would be seen from elevated areas of remnant ancestry where *'The forts are often located atop conspicuous promontories which offered commanding fortification sites and now the best vantage points to enjoy the scenery'*, as shown by Viewpoint 13/AESQ1. The proposal would bring large scale wind farm development in closer proximity to operational Bowbeat Wind Farm.

These effects are considered to be significant adverse and non-localised on the appreciation of SLQ4.

SLQ1 *'Diverse scenery of great charm and soft beauty'* and SLQ3 *'Green, intimate pastoral valleys'*

From both the Manor and Tweed valleys actual visibility of the proposed development would be anticipated from lower northern elevations, some higher northern elevations and much of the higher western valley sides.

From within the Manor valley partly screened to largely unrestricted views looking northward of the proposed turbines seen against the skyline would be experienced from an area approximately between Caverhill (north) and the entrance to Glenternie (south). This would include from sections of the single lane road / Peebles cycle trail / Innerleithen cycle trail, the John Buchan Way and some nearby properties. Similar views would be gained from lower northern elevations of the Tweed valley, including from sections of the B712, John Buchan Way and local cycle trails, as represented by LVIA Viewpoint 16/AESLQ3: Stobo, near Easterknowe Farm.

When ascending and descending some local summits from higher northern and western elevations within the Manor and Tweed valleys the proposed turbines would be seen breaching the skyline in northward looking views affecting the transition between SLQ1, SLQ3 and SLQ4 *'Expansive, open hills with panoramic views'*.

While Bowbeat Wind Farm already occupies a similar portion of view to the proposed development from within the Manor and Tweed valleys it is largely seen as a distant background feature. In contrast given the height of the proposed turbines they would become the dominant focal point.

SLQ1 aspect *'with varied land use and scenery of great charm and soft beauty'* is well expressed within the Manor and Tweed valleys and would be adversely affected where the focus along the lower northern extents of both valleys would be drawn up towards the proposed turbines

evident on the enclosing skyline. This is defined by SLQ3 where *'...the valleys are also invariably enclosed at each end...'*. The large size and scale of these man-made elements would conflict with *'the intimate sheltered valleys'*. From a localised area around Caverhill the proposed turbines would also be seen above the confluence of the River Tweed and the Manor Water and would impinge in part on the experience of where *'The valley floors widen at the confluences of the Tweed with the Holm, Manor and Lyne Waters which run as small rivers or large burns, giving views up the tributary glen'*.

These effects are considered to be significant, adverse and localised on the appreciation of SLQ1 and SLQ3. However, while we consider that effects would be localised some aspects including the *'...confluences of the Tweed with the Holm, Manor and Lyne Waters...'* are specific to the north eastern part of the NSA.

6 Aviation Lighting

The Upper Tweeddale NSA has relatively low baseline lighting levels with qualities of open rounded hills, containment, intimacy, and a lack of large industrial development. At present this area has a strong dark sky character and there are no apparent operational wind farms with aviation lighting close to the NSA.

We note the mitigation measures for night-time lighting described in Appendix 5.2 and that the AESLQ reports no significant night-time effects resulting from aviation lighting. However, we consider that night-time effects may be underestimated on elevated positions within the NSA with the closest representative night-time Viewpoint 9: Manor Sware Peebles, located just outside of the Upper Tweeddale NSA.

From elevated position such as those represented by Viewpoints 13/AESQ1: Cademuir Hill Fort, 15/AESQ1: Stob Law and 19/AESLQ4: Trahenna Hill, when daylight fades, the red aviation lights would appear new and incongruous, becoming focal points above existing ground level lighting.

We consider that mitigation measures proposed would limit effects on SLQs1 and 3, for SLQ 4 we would anticipate a higher magnitude of change than that reported but that effects would not be significant.

7 Cumulative effects

Proposed wind farms most likely to affect the SLQs of the Upper Tweeddale NSA include the at application wind farms of Cloich Forest and Scaud Law. Where visible from slopes and summits Cloich Forest would be seen either in successive views (looking north) at closer proximity, or combined views from longer distances with the proposed development. The introduction of the proposed development between operational Bowbeat and proposed Scaud Law would extend the presence of wind farm development east and southeast of Bowbeat and would reduce the potential gap between Bowbeat and Scaud Law.

Given the proximity of Cloich Forest, approximately 3.4 km north of the Upper Tweeddale NSA significant effects on SLQ4 *'Expansive, open hills with panoramic views'* are anticipated as outlined in the NatureScot response 25th October 2021. The introduction of Scaud Law is unlikely to significantly affect the SLQs of the Upper Tweeddale NSA given the intervening distance of approximately 11 km as stated in NatureScot response 2 February 2024.

We consider that the addition of the proposed development to a scenario that would include the introduction of Cloich Forest would result in a significant adverse cumulative effect on SLQ4 *'Expansive, open hills with panoramic views'*.

8 Mitigation

We advise the determining authority to encourage the applicant to explore a reduction in turbine height with the aim of reducing visibility/ intrusion; particularly where the proposed turbines would impinge on the smaller scale settled Manor and Tweed valleys. This could also help in terms of the turbines being more proportionate in scale to the underlying landscape, Bowbeat Wind Farm, application wind farm Cloich Forest (149.9 m to blade tip height), and potentially negate the need for aviation lighting and potential for associated adverse night-time effects.

9 Conclusion

On its own we consider that the introduction of the proposed development would have a non-localised significant adverse effect on SLQ4 *'Expansive, open hills with panoramic views'*, and localised significant adverse effects on SLQ1 *'Diverse scenery of great charm and soft beauty'*, and SLQ3 *'Green, intimate pastoral valleys'*. Localised effects while adverse on SLQ2 *'The historical continuity of settlement'* are not considered significant.

Cumulatively we consider that the addition of the proposed development to a scenario that would include the introduction of Cloich Forest Wind Farm would result in a non-localised significant adverse cumulative effect on SLQ4 *'Expansive, open hills with panoramic views'*.

In conclusion, although there would be significant adverse effects on three of the special qualities, we consider that the main adverse effects would be largely limited to north eastern parts of the NSA and, on balance, the proposed development would not adversely affect the overall integrity of the Upper Tweeddale NSA. Significant adverse effects on SLQs could be reduced by reducing the height of the proposed turbines which could negate the need for aviation lighting and potential for night-time effects.

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