

PLANNING CONSULTATION

To: Craig Miller

Date: 23/02/2023

From: RD

Ref: 23/00013/S36

PLANNING CONSULTATION

Subject: Wind farm development and ancillary infrastructure
Land North And East Of Holylee (Scawd Lee Wind Farm) Walkerburn Scottish
Borders

OBSERVATIONS OF: Ecology Officer

CONSULTATION REPLY

I have not visited the site to inform this consultation response. An assessment was made using desk survey data, aerial photography and details submitted by the applicant.

Ornithology

Given the quite large number of Goshawks that were observed within the study area, the presence of Merlins and all 4 of the Schedule 1A birds – breeding and non-breeding - I strongly believe that Species Protection Plans to cover all of these species are required.

8.7.9 Notes that works could be timed to avoid sensitive periods and use buffer zones "if and where possible"; The timing of works and use of buffer zones to avoid disturbance of schedule 1A and schedule 1 species ought to be seen as the non-optional legal requirement that it is.

I have some concerns about the long-term noise and shadow flicker impacts of the development on the Moorfoot Hills SSSI and its upland bird assemblage (qualifying interest).

8.7.13 acknowledges that some birds such as curlew, golden plover and hen harrier breed at lower frequencies within 500m or even 800m of turbines and that non-breeding birds can also be impacted in their distribution due to the avoidance buffers they adhere to.

T6, T7 and T8 are located directly adjacent to the Moorfoot Hills SSSI and a 500m potential avoidance buffer within the SSSI would mean the upland breeding bird assemblage would likely no longer use at least 90ha of the SSSI as they do now – this would rise to ca. 150ha if the avoidance buffer were 800m.

Considering the potentially/likely affected area is very large, and the nature recovery aims of NPF4 policies 1, 3 and 4, T6, T7 and T8 should be located further away from the SSSI boundary, ideally to a completely different location within the development site.

The report on the Golden Eagles mentions that Golden Eagles are generally good at avoiding turbines (it does specifically refer to fledglings); the collision modelling calculated 0.1 collisions per season, assuming avoidance behaviour. This rises to 1.97 predicted mortality per season with no avoidance behaviour. Considering that golden eagle fledglings could be in close vicinity to the turbines I am currently inclined to consider the 1.97 predicted mortality per season more realistic. Which would mean any breeding success

at the beginning of a season could be wiped out by the end of every season. Under these circumstances, I would question whether proposal would conflict with the Nature Crisis part of NPF4 policy 1, which aims to create nature positive places and drive nature restoration.

Peat & Carbon

The location of wind turbine 6 on class 1 peat is less than ideal.

Habitat Management Plan

It would be very beneficial to see an Outline Habitat Management Plan (OHMP) before this application is decided. The OHMP should include further details on the proposed low-intensity grazing regime and the proposed woodland planting e.g. species composition, density, timings.

Marshy grassland, as identified within the site (M10, M23, M25, M32 and MG9) are included in SBC's Local Biodiversity Action Plan as a priority habitat. The OHMP should include details of how the 0.99ha that will be lost as a result of the development will be compensated for within the site.

The Habitat Management section states that peatland restoration is proposed (5.5ha) to be offset. In principle this could be possible if an agreement can be reached with an organisation that SBC already work with on peatland restoration.

NatureScot may also be able to advise whether the Moorfoot Hills SAC could be used as an offsetting location.