THE ELECTRICITY WORKS (ENVIRONMENTAL IMPACT ASSESSMENT) (SCOTLAND) REGULATIONS 2017

ELECTRICITY ACT 1989 : APPLICATION FOR SECTION 36 CONSENT FOR THE PROPOSED NEWLANDS HILL WIND FARM IN THE PLANNING AUTHORITY AREA OF EAST LOTHIAN COUNCIL

ECU00004603

East Lammermuir Community Council comments 27 January 2024

Overall position

East Lammermuir Community Council neither opposes or supports the Newlands Hill Wind Energy Hub proposal. This reflects the findings of a local survey we carried out in December 2023/January 2024 which demonstrated that the community most affected in East Lammermuir – that is, in and around Stenton – is divided in opinion with 50% in support and 50% opposing the proposal.

However, survey respondents did demonstrate strong opposition to the proposed access routes for construction of the proposed the Newlands Hill Wind Energy Hub. This builds on experience elsewhere in East Lammermuir. Therefore, we propose a list of planning conditions which should be added to any consent accorded to this proposal.

Detailed position

The anonymised summary responses to the survey show the following overall position:

77% of those with an opinion support onshore wind as a contributor to the shift to Net Zero.

88% of those with an opinion support offshore wind as a contributor to Net Zero.

50% of those expressing an opinion support the Newlands Hill Wind Energy Hub proposal. 50% oppose the proposal.

In relation to the proposed access routes for construction of the Newlands Hill Wind Energy Hub proposal, 80% of those expressing an opinion oppose the route for large loads, and 88% oppose the route for construction traffic.

Proposed Planning Conditions

Many explanatory comments and supporting statements were submitted by survey respondents. Based on those comments, and experience elsewhere in East Lammermuir in mitigating the impact of construction traffic, the community council requests that the following planning conditions are imposed as an essential part of any consent given to the Newlands Hill Wind Energy Hub proposal.

Overhead lines

Overhead lines on pylons would be unsightly and if this application goes ahead, a condition should be made that all connections are made by underground cable, within the site and to the National Grid.

Micro-siting

The proposal includes an allowance for local re-positioning by 75m to suit site conditions. As the ground is sloping, by examining the contours it can be seen that the ground level at the turbine position could be up to 15m higher at the adjusted position. No indication has been given that the turbine height will be adjusted to keep the tip level (above sea level) the same. If this application goes ahead, a condition should be made that the turbine tip levels should not be increased due to micro-siting.

Construction Traffic Management

If this scheme goes ahead, mitigation measures and restoration measures should be agreed with the local community as well as with statutory authorities.

1. The developer should be required to establish a Community Liaison Group including representatives nominated by community groups including the affected Community Councils, East Lothian Council and the Developer and Contractors, with genuine power to plan, monitor and manage construction traffic.
   Reason; to ensure that the experience and skills of local affected community members are a strong influence on traffic management decisions

2. The Liaison Group should sign off an agreed procedure for dealing with complaints in a timely manner.
   Reason: to ensure that complaints about construction traffic are dealt with quickly and effectively to the satisfaction of all parties.

3. A) Where possible traffic should not be permitted to move on public highways, and haul roads should be constructed instead.
   Reason; the local roads proposed for use are not appropriate for this purpose, and construction traffic is likely to severely impact on local people's freedom of movement, as well as cycling, walking and horse-riding activities.

B) where it would be more destructive to construct a haul road, and construction traffic or large loads have to use the public roads between the A199 and the site, alternative safe routes for walking, horse-riding, cycling etc should be put in place for the duration of the construction works.
Reason: to ensure that efforts to increase the rates of active travel are not undermined by the construction of this green energy infrastructure. Research demonstrates that a temporary enforced break can put an end to a regular exercise habit.

4. Where lorries are moving on rural roads any residents should be asked to choose either "convoy" or separate movements, according to their own preference. Convoys may consist of up to 8 vehicles.
   Reason; to ensure that the experience and skills of local affected community members are a strong influence on traffic management decisions

5. Where groups of construction workers need to access the site each day, they should be transported by bus from a muster point at East Linton.
   Reason: to minimise the number of vehicles added to the local roads during construction.

6. All construction traffic, including private vehicles where used to access the site itself, should be fitted with trackers. These can be used to monitor speed.
   Reason; to facilitate effective monitoring and management of construction traffic.

7. A 20mph traffic speed limit should be implemented for all construction traffic between the A199 at East Linton and the construction site. This includes contractors' private vehicles where these are used to access the site.
   Reason; accidents occurring at more than 20mph kill pedestrians and cyclists. Below that speed, survival is more likely.

8. Working hours: Monday - Friday only, 07.00 – 19.00 – no working at weekends.
   Reason; to limit loss of amenity for local residents.

   The local primary school in Stenton is likely to have pupils who need to travel daily across the proposed traffic routes. The Herad Teacher has expressed enthusiasm for working with pupils and Developers to draw up a map of routes to school.
9. Where schoolchildren cross the proposed routes for construction traffic then traffic should be paused for thirty (30) minutes at the beginning and end of each school day. This may vary on different days of the week – if a standard pattern is more helpful for construction this should be agreed through the CLG.
   Reason; to reduce the possibility of a schoolchild being killed by construction traffic on their way to school.

The estimated peak flow of 130 HGV per day (for 6 months) equates to one every 4 minutes if evenly spaced over eight hours. This will cause some non-construction drivers to consider diverting through Stenton rather than have to keep pulling off the road.
Through Stenton, which now has a 20 mph speed limit, parked cars reduce the width so in places it is effectively single track with passing places. Stenton has a primary school and a school bus connection to Dunbar Grammar School, with pupils arriving on foot or bicycle or by car, all adding to traffic at drop-off and pick-up times.

10. No construction-related traffic should move through the Stenton village at any time. This includes contractors' private vehicles where these are used to access the site.
Reason: to prevent avoidance of traffic management by individual drivers and to protect the village life.

11. A road survey should be carried out prior to commencement of construction activity. Belltown Power should then work with local community groups including ELCC and East Lothian Council (and any other developers active on this route) to agree road improvements, and put them in place before this phase of construction. May include passing places, drainage, as well as the obvious road surfaces. Unlikely to include any widening of the road – that tends to speed traffic up. This will both improve the contractors' experience and leave a positive legacy once the work is done.
Reason: experience suggests that only repairing roads after the event simply ensures misery for local people throughout the construction period.

12. Wherever cutting back of vegetation is required to allow safe access for construction traffic or large indivisible loads, all trees and hedges should be replaced and the appearance restored to its rural condition, within two years of final commissioning of the site.
Reason: to ensure that there is no sustained negative impact on vegetation or biodiversity once the construction work is complete.

13. Direct Contact with Belltown supervisor should be provided and available throughout all working hours – email and mobile preferred. Local residents should be asked if they would be willing to give mobile numbers for a text alert system and such a system used to notify of large or slow-moving loads throughout the construction period.
Reason; to ensure effective information to community and feedback on local experience throughout the construction period.

<u>De-commissioning</u>

The proposal appears to be to remove the plinths and structures down to perhaps 1.0m below ground level and leave the bases and parts of structures below that level in place. No detail was found on how tracks and hardstandings would be dealt with, this all appeared to be left to agree in the future.

Proposed Condition; There should be an outline decommissioning scheme in place, even if changed later, so that it can be costed and the money set aside as a bond to ensure compliance.