

By email to: Econsents_Admin@gov.scot

Mr Allan Kelly
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Dear Sir/Madam

Brown Rig Wind Farm, Etrick Valley: Environmental Impact Assessment Scoping Report

ECU reference: ECU00004525

Background and Context

1. SSE Renewables has submitted a scoping report for a wind farm above the Etrick Valley in the Scottish Borders, roughly midway between Peebles and Moffat, for 20 turbines at 200m BTH.
2. Mountaineering Scotland is a membership organisation with more than 15,000 members and is the only recognised representative organisation for hill walkers, climbers, mountaineers and ski-tourers who live in Scotland or who enjoy Scotland's mountains. We represent, support and promote Scottish mountaineering, and provide training and information to mountain users for safety, self-reliance and the enjoyment of our mountain environment.

Assessment

3. Our observation is that this proposal is for a prominent wind farm in an area currently without such intrusion, affecting an arc of Donalds and high ridges from SSE clockwise to NE, popular as day walks from the Central Belt. Donalds are hills in lowland Scotland that exceed 2000 feet (609.6m) in height. Many of these hills are already impacted from the West and SW by existing wind farm developments; Brown Rig would create a wholly new impact from the East.
4. Our main concern at this stage is ensuring that the proposed viewpoints will allow a comprehensive assessment of the proposed development from a mountaineering/hillwalking perspective should an application be made.
5. There is absence of viewpoints representing hillwalkers. Only White Coomb truly represents hillwalkers. Several other viewpoints are borderline between hillwalking and 'country walking' but that does not make up for the failure to include enough hillwalking viewpoints, especially since hillwalkers will be among the main receptors impacted by the proposed development.
6. The absence of viewpoints on the extensive hill area northeast of the proposed development is striking. We suggest that one of, better still both, Dun Rig (NT254316) and Dollar Law (NT178278), to the NE, be used as viewpoints. Both are well-used by hillwalkers from the Central Belt.

7. The absence of any hill viewpoints to the south is also notable. We suggest that Ettrick Pen (NT199076) should be used to ensure a sufficiently distinct angle of view from White Coomb.

8. We agree that a WLA assessment will be needed. This should include a viewpoint on the middle-level ground east of Lochcraig Head, such as Muckle Knees (NT194189), from which there is fuller visibility of the development than from the proposed Bridgend Hill viewpoint.

9. The Scoping Report makes several references to Barrel Law wind farm. This has been applied for twice, refused by Scottish Borders Council twice and refused on appeal by the DPEA twice, most recently in 2019. There is no current application at Barrel Law known to us and there is certainly not an operational wind farm there (Scoping Report para 9.2). Nor do the Report authors seem aware that there has been no prior wind farm development in this area when they write: "The proposed access routes ... will seek to utilise routes previously used for operational wind farms in the vicinity of the Proposed Development ..." (11.2). It reads very much like a desk-study, copy-and-paste report rather than based on the context of this site.

Yours sincerely



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