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ECU Ref: ECU00006282

28/08/2026

Dear Mr Lewis,

HARTSGARTH WIND FARM – ECU00006282 – NEWCASTLETON AND DISTRICT COMMUNITY COUNCIL – SCOPING CONSULTATION RESPONSE

The Applicant thanks Newcastleton and District Community Council (NDCC) for their detailed response to the Hartsgarth Wind Farm Scoping Report. We appreciate the time and consideration given to the issues raised and welcome the opportunity to continue constructive dialogue with NDCC as the project progresses.

Below we provide our responses to the matters you have highlighted.

Justification for Hartsgarth Wind Farm

Hartsgarth Wind Farm is being brought forward to help Scotland and the UK meet its legally binding climate change targets, and to achieve the ambitious renewable energy targets set out in national planning, climate change and energy policy. National and regional policy continues to emphasise the need for additional renewable generation and grid-connected capacity to achieve net zero, improve energy security and reduce reliance on fossil fuels and the project is considered a significant development of national importance in terms of the National Planning Framework 4 (NPF4).

We are committed to designing the project to avoid, reduce and mitigate any adverse impacts and, where possible, enhance the surrounding environment. A description of the likely significant effects of the project will be presented in an objective and transparent manner within the EIA Report, which will also (amongst other information) set out what reasonable alternatives have been considered as part of the design process.



Viewpoints

We confirm that multiple viewpoints from Hermitage Castle will be included in the cultural heritage assessment, as proposed by Historic Environment Scotland (HES) in their scoping consultation response dated 11th December 2025:

- From a location along the northern extent of the park boundary, the 'White Dyke', looking south downhill towards Hermitage Castle;
- From a location along the northernmost extent of the deer trap looking south downhill towards Hermitage Castle; and
- From a location close to the castle on its west side looking towards the proposed development.

Additional cultural heritage viewpoints may be included for assessment following a review of assets in the wider landscape, and their contributory setting significance and components.

An additional LVIA viewpoint will be added at Lord Walter's Seat and from the Breathing Space Bench.

In accordance with NatureScot guidance, all viewpoint baseline photography will be collected as 360-degree photography. In valley locations where only the Proposed Development would be visible, a 90-degree or 180-degree baseline view would be appropriate. In upland locations that allow views of cumulative wind farms in multiple directions, a 360-degree baseline view may be appropriate. The decision regarding whether to present baseline photography in the photomontage visualisations as 90-degree, 180-degree, 270-degree or 360-degree baseline views will be taken later in the project and will be dependent on the extent of cumulative wind farms that are visible from the viewpoint and is expected that there will only be a limited number of locations where 360-degree baseline views will be considered necessary.

All visualisation associated with the EIA Report will be produced to comply with relevant NatureScot guidance.

Cumulative Assessment

As outlined in Section 5.5 of the Hartsgarth Wind Farm Scoping Report, a cumulative landscape and visual assessment study area radius of 60 km from the Site was initially considered, accounting for NatureScot guidance. A plan was then prepared illustrating all cumulative sites within a 45 km radius (Figure 5.5). However, following a review of the location of cumulative wind farms and the limited extent of theoretical visibility of the Proposed Development as illustrated by Figure 5.3, it is proposed to adopt a 15 km detailed cumulative landscape and visual study area. This is considered to represent a proportionate extent of the study area and the limit within which any potentially significant cumulative effects might occur. No feedback has been received from NatureScot or Scottish Borders Council with regards to the cumulative landscape and visual assessment methodology, however we will undertake further engagement with these entities in the preparation of the EIA Report.



We will ensure that the cumulative assessment is transparent and that stakeholders can clearly see which developments have been taken into account and why.

Residential Visual Amenity (RVAA) Study Area

The RVAA will be carried out in accordance with the Landscape Institute Guidance (TGN 02/19 Residential Visual Amenity Assessment).

However, the RVAA study area will be extended to 3 km. In line with guidance, properties will be grouped where they share a similar outlook and only those properties judged to experience the greatest magnitude of change would be subject to more detailed examination to determine whether the Residential Visual Amenity Threshold has been reached.

EIA for Wind Farm Separated from the EIA for the Grid Connection

We are aware of the recent Raeshaw Farms judgment and are considering the potential implications for the project. The EIA will be undertaken in accordance with the requirements of the EIA Regulations, and will identify, describe and assess matters in an appropriate manner, in light of the circumstances relating to the project including in relation to grid.

Transport

At this early scoping stage, potential AIL routes are indicative and subject to further detailed feasibility work. We are in the process of completing further technical assessment of the potential AIL routes, and we will engage with local communities before finalising any AIL route to ensure that community safety and amenity are fully considered.

The Transport and Access Assessment within the EIA Report will consider cumulative construction traffic where there is a realistic prospect of construction periods for other developments overlapping with Hartsgarth Wind Farm. The assessment will include relevant schemes based on their construction programme and proposed delivery/ construction transport routes, subject to the level of data available from public sources.

We appreciate local concerns about construction traffic and will work with the roads authority and other developers to avoid, where possible, the most intensive overlaps and to identify appropriate mitigation.

The likely impacts of construction traffic will be reviewed in detail and appropriate mitigation will be provided.



Ornithology

The Ornithology assessment completed as part of the EIA Report will include a specific and detailed assessment of Schedule 1 raptors (including Golden Eagle, should they be present/using the area) and other protected species.

We will consult with NatureScot and, where appropriate, engage with the South of Scotland Golden Eagle Project and local raptor study groups to ensure we have the best available information.

Should the assessment identify significant risks, we will consider avoidance, design refinement and mitigation measures as required, and report these clearly in the EIA Report.

NatureScot guidance states that Passerine species are not generally considered to be significantly impacted by wind farms; however, the development will include best practice mitigation to avoid or minimise effects on breeding passerines during construction.

Flooding

It is acknowledged that the development sits within the catchment area of the Liddel Water catchment area and Newcastleton is designated a Potentially Vulnerable Area (PVA) by SEPA, with a history of flooding. We understand the concerns raised by residents regarding flooding in Newcastleton. Wind farm infrastructure will be carefully designed to ensure the functionality of watercourses is not impacted, and a Sustainable Drainage System (SuDS) will be developed for the site which will control surface run off to greenfield rates (i.e. pre-development rates of runoff) during construction and operation of the wind farm. One of the fundamental principles of the drainage design will be to ensure runoff from the site and within the Liddel Water catchment does not increase flows within the Liddel Water and thus increase downstream flood risk. As such, it is not anticipated that the construction of the wind farm will increase the likelihood of flooding in Newcastleton.

Peatland restoration delivered as part of the project has the potential to act as a water retention mechanism. A Peat Landslide Hazard Risk Assessment (PLHRA) will be completed as part of the EIA.

Socio-Economic Impact

As outlined within the Scoping Report, a Socio-Economic, Recreation and Tourism Impact Assessment will be undertaken as part of the EIA for the proposed Hartsgarth Wind Farm. The assessment will consider the potential effects of the development during construction, operation and decommissioning, and will be prepared in accordance with relevant Scottish Government guidance, NatureScot guidance and recognised good practice. The assessment will include consideration of potential impacts arising during construction for users of tourism and recreation receptors within 5 km of the proposed wind farm. It will also assess the impact on tourism accommodation from demand associated with construction workers.



The Proposed Development will create jobs and contribute to Gross Value Added (GVA), a measure of economic productivity, during the construction, operation and maintenance, and decommissioning phases. It should be noted that the Applicant is committing to a community benefit fund equal to £5,000 per MW of installed generation capacity and is offering the opportunity for up to 10% community shared ownership in the project. The Applicant would welcome the opportunity to discuss with the community opportunities building on the existing tourism offerings in the area.

Aviation Lighting

In order to reduce the visual effects of aviation lighting during the hours of darkness, a reduced lighting scheme will be agreed with the Civil Aviation Authority in order to reduce the number of visible aviation warning lights required and the need to intermediate tower lighting. Mitigation of visible turbine lighting will be embedded into the design of the lighting scheme to reduce the intensity of lighting in certain atmospheric conditions and reduce the amount of vertical downwards lighting in order to reduce the visual effects experienced by receptors below the lights. Dark sky visualisations will be included and assessed as part of the LVIA. It is anticipated that, as part of the standard planning condition, there would be provisions for regular reassessment of options to reduce the lighting, as well as potential for Aircraft Detection Lighting Schemes (ADLS)?

Battery Storage

The feasibility of a Battery Energy Storage System (BESS) at this location continues to be explored. If a BESS is included within the Proposed Development, the EIA Report will assess impacts and propose appropriate mitigation, where necessary.

Langholm and Newcastleton Hills SPA and SSSI

As outlined within the Scoping Report, consideration will be given to potential impacts to qualifying species of the Langholm and Newcastleton Hills Special Protection Area (SPA) and Site of Special Scientific Interest (SSSI). The proximity to the SPA means that there is likely to be connectivity between the Site and the European protected SPA site. Given this likely connectivity, any application for the project will include sufficient information to enable Scottish Ministers to carry out a Habitats Regulations Appraisal (HRA) to assess whether the project is likely to have a significant effect on the qualifying features of the SPA and the site's conservation objectives.



Ongoing Engagement

We welcome NDCC's willingness to engage as the application process advances.

We hope that this response demonstrates that your comments are being taken seriously and will inform the scope and approach of our assessments.

Thank you again for your considered input at this stage of the process. Should you have any further questions or wish to discuss any aspect of this response in more detail, please do not hesitate to contact us.

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Project Development Manager

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