

LCC Representation to ECU Consultation on Glenburnie Wind Farm

Re ECU Reference: ECU00004774

Lauderdale Community Council (LCC) **object** to the Glenburnie Wind Farm proposal.

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1. Justification

The newly re-convened Lauderdale Community Council (LCC) carried out a survey of Residents' views on Glenburnie Wind Farm between 05 – 12 September 2025.

The survey had a total of 517 responses, of which 438 were from the LCC area. The results of the survey show that 70% of respondents are opposed to the Glenburnie Wind Farm (see Appendix)

Based on the indication that a significant number of Lauderdale residents are opposed to the Glenburnie Wind Farm the LCC would like to object to the Glenburnie Wind Farm proposal. The Community Council's views on the proposal are outlined below.

2. Commentary

Lauderdale Residents were asked to indicate their views on 9 topics for consideration: *Construction Traffic; Visual Impact; Large Scale Change of Land Use; Possible Damage to Archaeological Sites; Effect on Biodiversity; Contribution to Net-Zero Targets; Maintaining Paths and Access; Possible Impact on Property Prices; Potential Community Benefit Fund.*

The LCC's concerns regarding these topics are detailed below.

a. Construction Traffic

We acknowledge that transport issues are considered in Volume 1, Chapter 11 of the application and that mitigation measures have been proposed, including a Construction Traffic Management Plan to be agreed with SBC.

However, residents remain deeply concerned about the volume of large vehicles and abnormal loads using local roads, particularly in and around Lauder. The proposed access route via the unclassified D-Class Road D124 is especially problematic. This narrow, single-lane road, running between Cleekhimin House and Woodrigdean, lacks the capacity for abnormal indivisible loads (AILs). It is bordered by a steep, eroding slope into the Cleekhimin Burn, raising serious safety and maintenance concerns.

We dispute the applicant's assumption that disturbance to residents along both the D124 and A697 will be 'negligible' (Table 11.8). Further, erosion of the A697 bridge over the Cleekhimin Burn will likely be worsened by construction traffic, compounding risk to an already vulnerable piece of infrastructure.

Policy Conflicts:

- NPF4 Policy 13 (Sustainable Transport): Development must minimise traffic impacts and support safe, sustainable networks.
- NPF4 Policy 23 (Health and Safety): Heavy traffic on unsuitable roads increases risks to community safety.

b. Visual Impact

The application proposes twelve turbines, each 220m tall. At present there are no turbines of comparable size in Scotland. It is difficult for the layman to envisage the scale of the new generation of wind turbine; up to 2 or 3 times the height of the first generation (eg. nearby Dun Law).

The accumulative impact cannot be over exaggerated: The scoping report lists 461 turbines over 70m height within 35km of the site, with a further 97 turbines over 150m in planning or scoping.

The view from our uplands, famed for their beauty, is frequently interrupted by starkly visible monoliths on an inhuman scale. The new turbines will dwarf those nearby and be visible as far away as Fife and the Cheviots: they will dominate the Lauderdale valley.

We are particularly concerned about the absence of detail on the proposed 135kV overhead line connection to the grid. Its siting will itself create a significant visual impact on Lauder and should be considered integral to the application.

Lauderdale is rapidly becoming an 'energy corridor,' eroding its identity as a rolling pastoral landscape.

Policy Conflicts:

- NPF4 Policy 4 (Natural Places): Significant harm to valued landscapes.
- NPF4 Policy 7 (Historic Assets and Places): Visual intrusion on heritage settings.
- NPF4 Policy 11 (Energy): Renewable developments must minimise adverse visual impacts; this proposal fails that test.

c. Large Scale Change of Land Use

If consent is granted, the upland unit at Glenburnie will be transformed from a biodiverse, tranquil moorland into a noisy, semi-industrial energy hub.

We recognise the need to balance national energy requirements with finite land resources, as well as the pressures faced by farmers and landowners to diversify income streams, yet it is clear from NPF4 Policy 11 that areas identified for wind farms are expected to be suitable for use in perpetuity. This implies that, if Glenburnie was to be granted Consent, then the land use for this area will be fixed. This is of particular concern in the light of the large number of nearby wind farms, as the land use of the Southern Uplands will be locked and other traditional or innovative land management practices prohibited from accessing the land. Further afforestation and 're-wilding', both of which are valued in addressing climate and biodiversity challenges, will be prevented as these have an impact on wind patterns.

This application includes provision for re-powering; future turbines will require new footings and access routes, so we will be left with a legacy of successive generations of wind turbines each leaving an indelible mark on the landscape. Scottish Government's Onshore Wind Policy Statement (2022) acknowledges that delivering 20GW of power by 2030 will change the landscape.

The long-lasting impacts on hydrology, botany and wildlife posed by wind turbines has not been properly assessed in this planning application. The potential for local flooding will be exacerbated by any development higher up in the catchment and, as there is already considerable damage caused by flooding of the Cleekhimin Burn, local residents' concerns are justified.

No assessment has been made of the private water supply to The Howe (Technical Appendix 10.1) and the developers have failed to engage with the owners. This lackadaisical approach to engagement with neighbouring landholdings is a concern to the LCC and we are disappointed that full, frank and frequent communication with all nearby residents has not been evident during the scoping and pre-planning process.

Policy Conflicts:

- NPF4 Policy 11 (Energy): Development locks land into perpetual industrial use, contrary to responsible siting.
- NPF4 Policy 2 (Climate Mitigation and Adaptation): Altered hydrology and flood risks undermine climate resilience.
- NPF4 Policy 3 (Biodiversity): Loss of habitat and exclusion of afforestation/rewilding conflicts with biodiversity enhancement aims.

d. Archaeological Sites

We disagree with the applicant's assessment of the potential impact on archaeological sites, as outlined under NPF4 Policy 7. The Lammermuir Hills and wider Scottish Borders are of exceptional archaeological and cultural significance, containing some of the highest density of Bronze and Iron Age hill forts in Europe, alongside Neolithic cairns, Bronze Age burials, medieval settlements, and post-medieval pastoral remains. This unique landscape is internationally important for understanding 2,000–3,000 years of human history and attracts visitors and archaeologists from around the world.

The proposed Glenburnie development lies within or close to numerous Scheduled Monuments, including Addinston Fort, Longcroft Fort and Homestead, Glenburnie Fort, The Howe, Hog Hill Settlement, and Soonhope Homestead. Other significant finds—such as Bronze Age axe heads, linear earthworks, and medieval farmsteads—remain relatively unexcavated, offering invaluable potential for future research.

Specific concerns include:

- A prehistoric burial cairn on Hog Hill would be destroyed.
- A preserved section of the ancient Herring Road (Dunbar to Lauder), a 30-mile drover's and trading route of cultural and regional importance, would be lost. The developer's own documents acknowledge that public rights of way and heritage paths will be disrupted, re-routed, or closed.
- Multiple Iron Age, Bronze Age, and Medieval sites would be directly or indirectly impacted.
- The developer itself has identified Longcroft Hill Fort as facing "significant adverse impacts."

Policy conflicts:

- NPF4 Policy 7 (Historic Assets and Places): The turbines, roads, and infrastructure will irreversibly intrude upon the setting and legibility of prehistoric monuments and settlements.
- Policy 4 (Natural Places): The development harms culturally important landscapes, contrary to protections for valued natural and historic environments.
- Policy 6 (Forestry, Woodlands and Trees): The scheme undermines the ecological and heritage value of the Lammermuir landscape.

- Policy 1 (Tackling Climate & Nature Crises): The proposal fails to balance renewable energy goals with safeguarding irreplaceable heritage.

e. Effect on Biodiversity

The Ornithology Reports produced as part of the application show that this site is abundant with birds that are considered *rare* in the UK. Several species which are relatively common at Glenburnie are found on the 'Red-List' of *threatened* or *near-threatened* bird species; some, like the Golden Eagle, Pink-Footed Geese and scarce raptors such as the Merlin & Peregrine Falcon are occasional visitors of *high conservation* value.

The proposed turbines will generate both direct and indirect effects leading to increased mortality of these birds. Collisions are bound to happen when turbine wing tips approach speeds of 100 miles per hour and have a radius of 85m. Wading birds and soaring raptors will be at risk from direct collisions with turbine blades and the construction phase will disturb ground nesting birds, bats and terrestrial animals. Any disturbance will result in increased mortality and a reduction in breeding success.

The infrastructure associated with the development, especially access tracks and overhead power lines (OHL), will facilitate access to the moorland and visibility of prey species: allowing for greater numbers of generalist predators that will further depress the populations of ground-nesting birds. There has been no assessment of the impact that OHL connecting the site to the grid would have on biodiversity. It is difficult to understand why OHL routes in general are not included as part of the planning application.

Glenburnie and the surrounding land holdings have made considerable investments in both time and money into enhancing the local biodiversity; often aided by the public purse. The Application sets out a Biodiversity Enhancement and Restoration Plan, but this does not mention the continuation of predator control on the site nor propose any actions that coordinate with neighbouring units to ensure that wildlife corridors and sufficient habitat remains for these iconic species.

It seems that, in the pursuit of net-zero policies, we are creating a landscape that is hostile to many iconic and rare upland species.

Policy Conflicts:

- NPF4 Policy 3 (Biodiversity): Direct mortality of red-listed species and habitat fragmentation.
- NPF4 Policy 4 (Natural Places): Damage to valued upland ecosystems undermines their natural value.
- NPF4 Policy 1 (Tackling Climate & Nature Crises): Fails to balance climate and biodiversity crises.

f. Contribution to Net Zero Targets

The Scottish Government has a legal commitment to reduce emissions, with a target to reach 'net-zero' by 2045. Renewable energy generation is a cornerstone of the Scottish Government's strategic policies on both Climate Change and Energy however our community survey results show that local

residents do not consider “net zero contribution” to be a strong justification for the Glenburnie development. Respondents consistently rated this factor as low in importance when compared with other concerns, particularly effects on biodiversity.

Soil is recognised as one of the most significant stores of carbon. This development should seek to protect soils as much as possible and manage water to prevent erosion of topsoil or river banks. The proposals for Glenburnie Wind Farm show that the Turbine locations are situated on areas of shallow (<50cm) peat. Whilst it is of concern that peat of any depth is disturbed, we are pleased to note that this site is not deep peat.

Evidence from previous applications to the ECU has led to an assumption that the Scottish Government is willing to place ‘net-zero’ considerations above those of other environmental concerns. The LCC hope that the ECU and Scottish Ministers place the Nature Crisis on an equal footing to that of Climate Change.

Any potential for additional flooding should also be considered when evaluating net-zero contributions; flooding of productive farmland or buildings will have oversized effect on CO2 emissions.

Policy Conflicts:

- NPF4 Policy 1 (Tackling Climate & Nature Crises): Net-zero targets cannot override protections for biodiversity, heritage, and landscapes.
- NPF4 Policy 11 (Energy): Requires responsible siting and cumulative impact consideration, which this proposal lacks.

g. Maintaining Paths and Access

Lauderdale is well used for outdoor pursuits by locals and visitors alike. Many people choose to live in or visit Lauderdale because of the easy access to scenic paths and quiet minor roads. Enjoying time outdoors is a major contributor to both physical and mental wellbeing.

The area around Glenburnie is popular for those seeking recreational outdoor pursuits, including cyclists, orienteers, runners, hikers, dog walkers, horse riders and sportsmen/women. There is a popular campsite close by at Carfraemill. A new walking route, ‘Walk with Cuthbert the Shepherd’ starts at nearby Channelkirk near Oxton, and the historic Herring Road path through the Lammermuirs passes through the proposed site (see section on Archaeological Sites).

The applicant has produced an outline outdoor access management plan (OAMP) in Technical Appendix 3.4. This plan considers only mapped paths in the development area - access to the development area via the local public roads and access to pathless areas within the site boundary are not considered. Both of these are significant considerations when assessing restrictions to outdoor access.

Suggested mitigations are vague and unenforceable - promising to keep path closure durations ‘to a minimum’ is subjective and unverifiable.

The OAMP is described as an outline plan, and to be revisited once a contractor is appointed, making it highly likely that this OAMP will be modified in the future.

Due to the many similar energy developments proposed for Lauderdale, the restricted access will potentially be part of a significant reduction in access to wild land in the area, changing the nature of life in Lauderdale for many. The likely reduction in visitors will adversely affect local businesses.

Policy Conflicts:

- NPF4 Policy 9 (Play, Recreation and Sport): Restricts recreational access and undermines policy support for active lifestyles.
- NPF4 Policy 23 (Health and Safety): Safe access to key routes such as St Cuthbert's Way and the Herring Road would be undermined.
- NPF4 Policy 4 (Natural Places): Public enjoyment of landscapes and cultural routes reduced.

h. Possible Impact on Property Prices

The survey responses indicate that many residents are concerned about the negative effect of the Glenburnie Wind Farm on property values, particularly for homes close to the site, holiday lets, and second homes that rely on the area's reputation for an unspoilt landscape. The perception of intrusive development, large-scale turbines, and associated infrastructure such as pylons and overhead lines is expected to deter potential buyers and visitors, undermining both residential and tourism-related property markets.

Properties such as The Howe and Longcroft will plummet in value.

Light pollution from the proposed 2000 candela aircraft warning lights and the anticipated felling/harvesting of existing woodland screening will further exacerbate visual intrusion, reducing the attractiveness of nearby properties for both residents and visitors. Once mature woodland is harvested, replacement planting will take several decades to provide equivalent cover.

The cumulative effect of multiple renewable energy projects in the area intensifies these risks. This aligns with strong survey findings that residents do not believe financial compensation or community benefit can offset personal and economic losses tied to reduced property values.

Policy Conflicts:

- NPF4 Policy 4 (Natural Places): The development undermines the attractiveness of valued landscapes, reducing residential amenity and economic value.
- NPF4 Policy 23 (Health, Safety and Wellbeing): Wellbeing is compromised when local communities face reduced quality of life and economic disadvantage through falling property values.
- NPF4 Policy 11 (Energy): Requires cumulative impacts to be considered; here, the combined effect on property and local economy has not been adequately addressed.

i. Potential Community Benefit Fund

The application refers to the possibility of a community benefit fund, yet our survey indicates that residents place very little weight on this. The majority of respondents did not view community benefit as an important factor in deciding whether to support or oppose the development.

Community benefit cannot compensate for or outweigh the cumulative adverse effects that residents fear—such as loss of biodiversity, damage to cultural heritage, and increased visual and

traffic impacts. There is also uncertainty over whether benefits would be distributed equitably within Lauderdale, and whether they would meaningfully offset the long-term impacts on the area.

Policy Conflicts:

- NPF4 Policy 1 (Tackling Climate & Nature Crises): Localised financial benefit does not address wider environmental harms.
- NPF4 Policy 3 (Biodiversity): The potential fund does nothing to prevent loss of habitat or species.

3. Conclusion

The Lauderdale Community Council (LCC) acknowledges Scotland's commitment to transforming its energy system and recognises the need for investment in renewable infrastructure. However, the proposed Glenburnie Wind Farm would place a disproportionate share of this burden on our community, while delivering little in terms of local benefit.

For the LCC there remain concerns that access to the site is insufficiently explained; the proposed construction will damage local biodiversity; the routing and design of critical connecting infrastructure is not included; and the cumulative impact from this application and others nearby is not adequately assessed.

Our survey of residents demonstrates clear, strong and consistent opposition to the Glenburnie development and further local expansion of renewable energy generation projects in general. Concerns are not limited to one issue, but span across biodiversity loss, visual intrusion, damage to archaeological heritage, construction traffic on unsuitable roads, and the erosion of Lauderdale's landscape identity. These concerns are compounded by the cumulative impact of multiple large-scale energy projects already concentrated in and around our area.

Respondents placed lower importance on net zero contribution or potential community benefit, making it clear that these considerations do not outweigh the serious and lasting harms identified. The evidence points to a development that would damage the natural environment, undermine local wellbeing, depress property values, and erode the cultural and historic assets that make this part of Scotland distinctive.

LCC therefore urges the ECU and Scottish Ministers to refuse consent for the Glenburnie Wind Farm on the grounds that:

- It would cause irreversible harm to biodiversity, landscape, and heritage assets.
- It would undermine community wellbeing through traffic, noise, light pollution, and reduced property values.
- It fails to adequately consider cumulative impacts from existing and proposed developments in the region.
- It conflicts with key provisions of NPF4, including Policies 1, 3, 4, 7, 11, and 23.

Once lost, our unique cultural landscapes, habitats, and quality of life cannot be recovered. The Glenburnie Wind Farm would not represent progress, but an unacceptable sacrifice for communities, visitors, the environment, wildlife and heritage for limited national gain.

For these reasons, LCC strongly objects to the application and calls for its refusal.

LCC recognise that the electricity network in Scotland and the UK at large is in the process of being transformed and that significant infrastructure investment will be needed. However, the cumulative effect resulting from a significant volume of new development and associated infrastructure in a relatively confined area will have a disproportionate impact on the residents of Lauderdale and nearby communities.

Appendix - Lauderdale Community Council survey results – General and Glenburnie

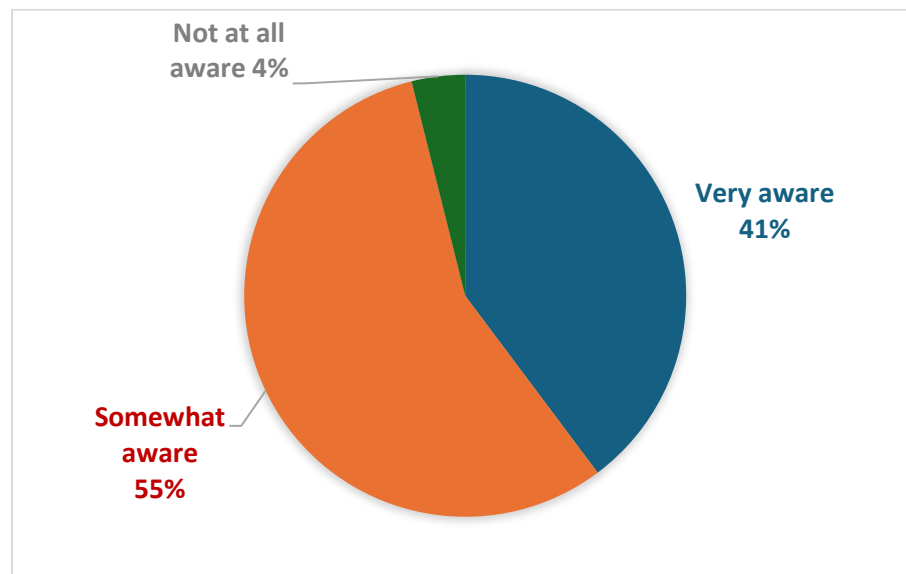
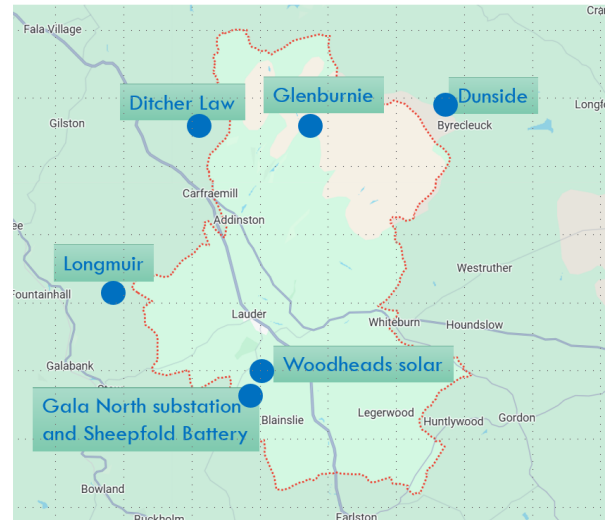
The survey was conducted online and on paper from the 5th to the 12th of September 2025. Five hundred and seventeen surveys were completed. The results presented here include only the answers from the 438 respondents who live within the area represented by Lauderdale Community Council, though the results are very similar if all respondents are included. Questions 3 to 8 are presented, along with the response summary. Questions 1 and 2 were regarding the location of the respondent.

Energy developments in and around Lauderdale.

There are a number of energy developments at various stages of consultation and planning in and around Lauderdale, including wind farms, solar farms, battery storage and grid infrastructure (see map for a selection).

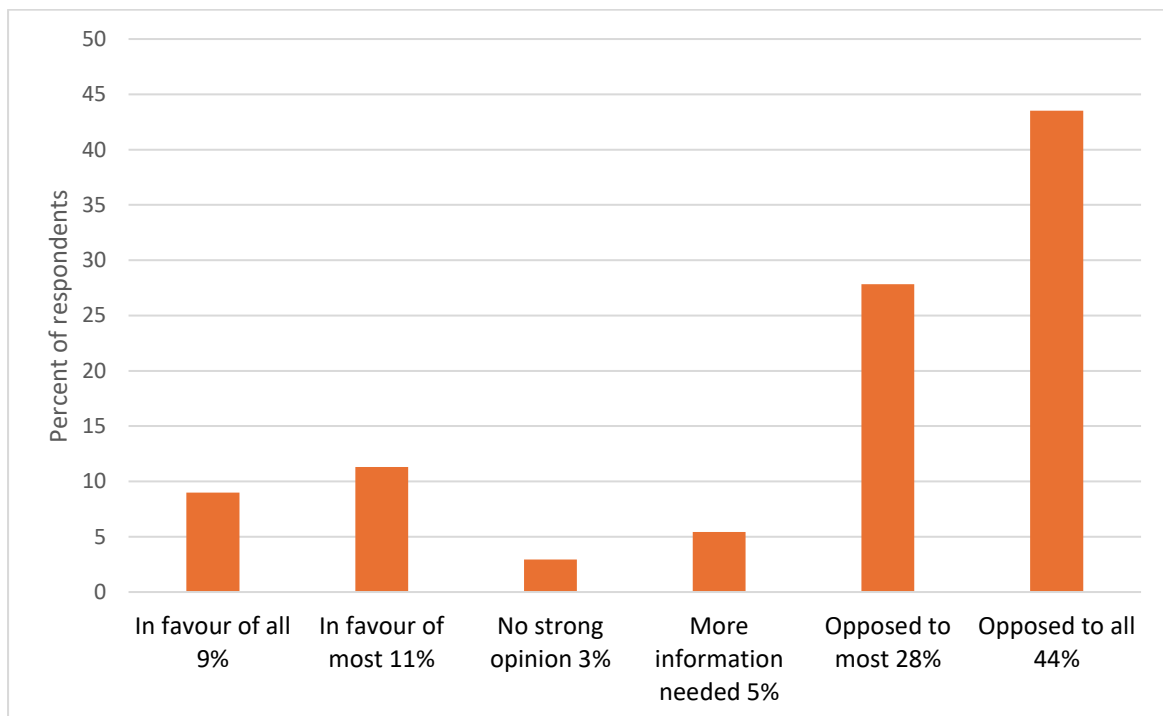
Q3. In general, how aware are you of these proposed developments?

Very aware	
Somewhat aware	
Not at all aware	



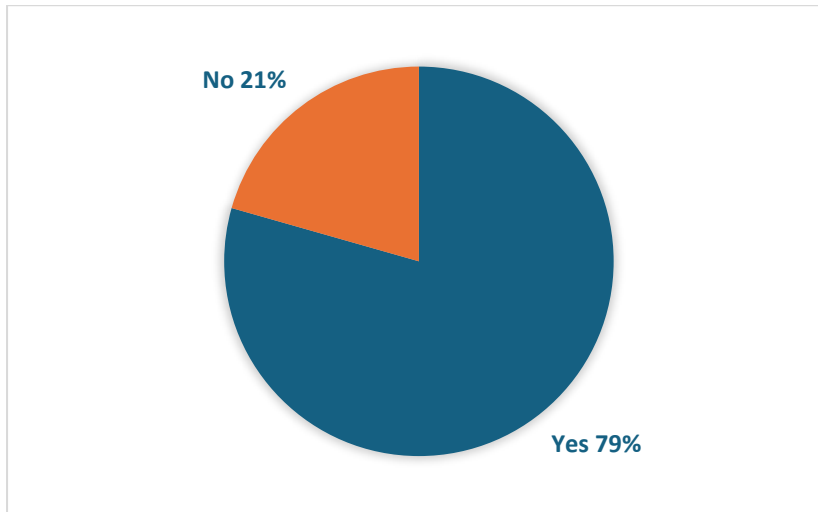
Q4. How do you feel about the developments in general? Please select the answer that most closely matches your opinion.

I am in favour of all solar, wind, battery storage and infrastructure projects in and around Lauderdale	
I am in favour of most of the solar, wind, battery storage and infrastructure projects in and around Lauderdale	
I don't have a strong opinion	
I need more information in order to form an opinion	
I am opposed to most of the solar, wind, battery storage and infrastructure projects in and around Lauderdale	
I am opposed to all solar, wind, battery storage and infrastructure projects in and around Lauderdale	



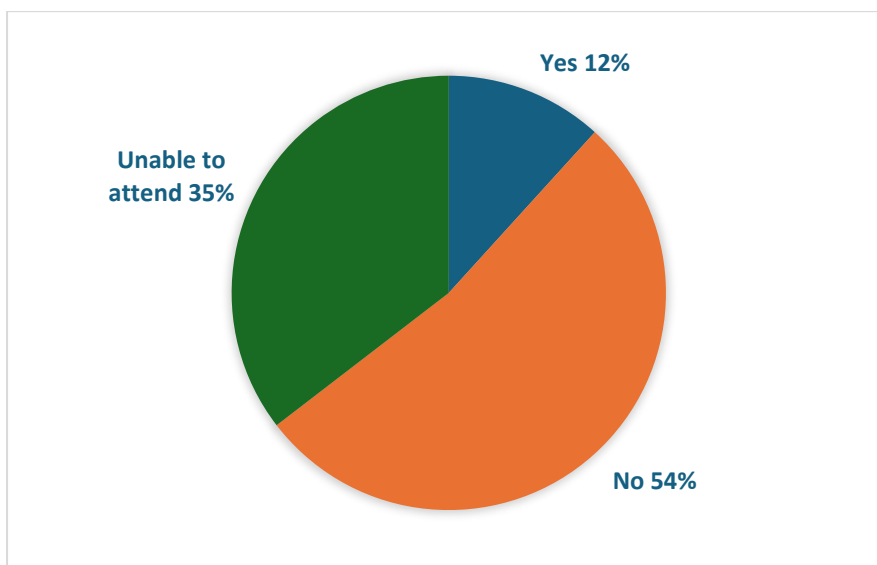
Q5. Were you aware of the proposed Glenburnie Wind Farm project before receiving this survey?

Yes	
No	



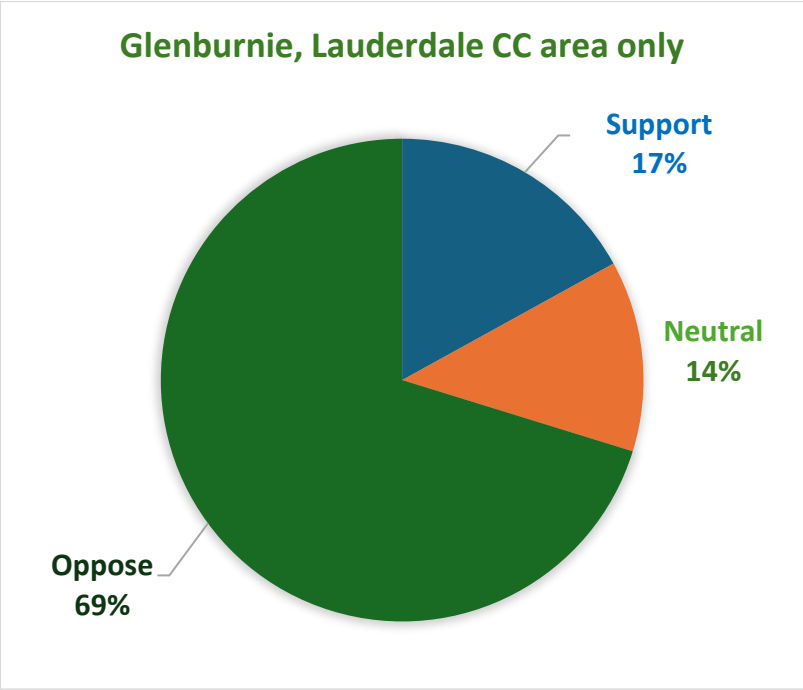
Q6. Have you attended a consultation event with the Glenburnie developer?

Yes	
No	
I would have liked to but was unable to attend	



Q7. What is your overall opinion of the proposed Glenburnie development?

Support	
Neutral	
Oppose	



Q8. How important were the following considerations in deciding whether you support or oppose the Glenburnie development?

	Very important	Somewhat important	Not important
Construction traffic			
Visual impact			
Large scale change of land use			
Possible damage to archaeological sites			
Effect on biodiversity			
Contribution to net zero targets			
Maintaining paths and access			
Possible impact on property prices			
Potential community benefit fund			

