ELECTRICITY ACT 1989 SECTION 36 AND SCHEDULE 8:

APPLICATION FOR THE PROPOSED CRYSTAL RIG 1 REPOWER IN THE PLANNING AUTHORITY AREA OF SCOTTISH BORDERS COUNCIL.

THE ELECTRICITY WORKS (ENVIRONMENTAL IMPACT ASSESSMENT) (SCOTLAND) REGULATIONS 2017 ("the EIA Regulations")

East Lammermuir Community Council has been asked to comment on this application. The entire access route to the Crystal Rig site passes through East Lammermuir. We note that with the necessary preceding decommissioning phase, this proposal will subject local residents and A1 users to a further 30 months (minimum) of disruption and delays. However, beyond that, the shift to repower an existing windfarm at Crystal Rig signals the de facto introduction of a permanent works access route from the A1 trunk road Thurston junction at Innerwick up to the Crystal Rig site. For this reason the community council wishes to emphasise a number of planning conditions necessary to reflect and seek to mitigate this major, permanent shift.

As wave after wave of existing generation developments at Crystal Rig and Aikengall reach the end of their operational life, the movement of construction and management traffic will become a permanent feature of life on the C122, C123, U196 roads past Thurston, Innerwick and Woodhall.

After attending local consultation sessions and having a series of visits from the Developers to Community Council meetings since 2023, community councillors feel confident that we understand the proposal and the views of local residents about it. The construction traffic will add to the construction traffic already passing or planned to pass through the East Lammermuir (Innerwick) area, but the proposed site is within a degraded site, largely hidden from most population dwellings and access roads.

East Lammermuir Community Council tentatively supports the proposal, as it proactively adds resilience to the local green energy generation whilst seeking to minimise impact on the local environment and its residents.

Whilst the community council supports the application, we would urge the Scottish Ministers, the Energy Consents Unit (and East Lothian Council where it has influence) to ensure the following conditions are met.

Proposed Planning Conditions

Generating capacity and grid connection

There is a discrepancy between the generating capacity of the current Crystal Rig array (perhaps 62.5MW) and the proposal (up to 72MW).

Proposed Condition: The project should be designed so that the power output is within the capacity of the existing underground cable and substation connection.

Reason: to prevent the need to dig up or augment the existing grid connection to Dunbar substation, many miles from the generation site.

Drainage

Very little detail has been given for the drainage and any potential impact on the Aikengall Water, which flows ultimately into Thornton Glen.

Proposed condition; Detailed proposals for managing drainage, including to the North of the site, should be presented and agreed before construction commences.

Reason; to minimise water damage impact on the East Lammermuir ecosystem

Micro-siting

A 100m micro-siting allowance is proposed. (Non-Technical Summary 15.) The ground level may increase by up to 15m over that distance.

Proposed condition; any micro-siting must not result in a raised hub or tip level.

Reason; to ensure that visibility is not increased.

Construction Traffic Management

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

1. The developer should be required to join or establish a Community Liaison Group including representatives nominated by community groups including the affected Community Councils, East Lothian Council, Scottish Borders 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 A1 and the site, alternative safe routes for walking, horse-riding, cycling etc should be put in place for the duration of the construction works – and in perpetuity as further (continuous) works now seem inevitable.
   Reason: to ensure that efforts to increase the rates of active travel detailed in the East Lammermuir Local Place Plan 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. This proposal signals a permanent change to use on several local roads – alternatives must now be provided for safe active travel.

4. Where groups of more than 10 construction workers need to access the site each day, they should be transported by bus from a muster point at or near the A1.
   Reason: to minimise the number of vehicles added to the local roads during construction.

5. 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.

6. A 20mph traffic speed limit should be implemented for all construction traffic between the A1 junction at Thurston Manor 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.

7. 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 Innerwick will have pupils who need to travel daily across the proposed traffic routes. The Head Teacher has expressed enthusiasm for working with pupils and Developers to draw up a map of routes to school.

8. 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. If this is not possible a "safe crossing" methodology must be agreed with the Parent Council of Innerwick School.
   Reason: to reduce the possibility of a child being killed by construction traffic on their way to school.

9. All project-related HGVs must turn left onto the A1 and left off the A1.
   Reason; this well-established rule has been implemented by all current construction projects in East Lammermuir, to reduce the likelihood of crashes on the A1.

10. No construction-related traffic should move through the Innerwick 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. Fred Olsen Renewables (and any other developers regularly using this road, including CWPEnergy and NnG / EDF Renewables or their successors) 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. It is time to act proactively and significantly improve the road for all users.

Hedgerow removal to facilitate construction is a major concern for local residents. It threatens wildlife corridors and there are ways to avoid it. Despite significant removals made to facilitate the construction of Crystal Rig IV windfarm, it now appears that further removals may be requested to facilitate the delivery of even larger turbine blades to the Crystal Rig Repower.

12. Proposed condition; Wherever cutting back of vegetation is absolutely necessary to allow safe access for construction traffic or large indivisible loads, the alternative of using "Blade Lifter" technology should be actively explored.
    Reason: to ensure that there is no negative impact on vegetation or biodiversity.
13. Proposed condition; Wherever cutting back of vegetation is absolutely necessary 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; affected hedgerows should be managed for the subsequent 30 years to ensure they thrive.
    Reason: to ensure that there is no sustained negative impact on vegetation or biodiversity once the construction work is complete.

14. Direct Contact with the site 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.

NPF4 Policy 3 Biodiversity Enhancement

15. The Developer and relevant contractors and sub-contractors should be required to join and work with the East Lammermuir Biodiversity Community Liaison Group to ensure that the efforts made to mitigate impact and enhance the local area are in line with that Local Place Plan's "Summit to shore" vision for the local ecosystems. The Developer must work with all nearby developments, and through discussion at the BCLG should directly inform their proposed Habitat Enhancement and Management Plan to agree Biodiversity-related actions associated with the Crystal Rig Repower development.

Reason: to maximise the biodiversity gain associated with all developments across the East Lammermuir area

De-commissioning

It is noted that the de-commissioning of the existing Crystal Rig 1 windfarm is not included within this planning application. This seems to establish a principle which is likely to be replicated for further phases of the Crystal Rig windfarms, and others in East Lothian and Scotland. Therefore any proposals for de-commissioning need to be future proofed as far as is currently possible.

1. Proposed Condition: There should be an outline decommissioning scheme in place, which must be reviewed in detail and subject to consultation two years prior to any work commencing. By 2058 our understanding of the least intrusive and polluting methods of deconstruction will have grown exponentially, and current practices may have been superseded.

Reason: to ensure decommissioning is no more destructive or climate-threatening than is absolutely necessary.

2. Proposed Conditions: 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.

Reason: to ensure decommissioning is implemented as agreed, always taking account of the previous planning condition.