

By email to: Econsents_Admin@gov.scot

Energy Consents Unit
Directorate for Energy and Climate Change
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Glasgow
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15 July 2021

Dear Sir/Madam

Rivox Wind Farm: Environmental Impact Assessment Scoping Report

ECU reference: ECU00003293

Background and Context

1. Belltown Power UK Wind Ltd has submitted a scoping report for a wind farm on Forestry and Land Scotland ground west of Moffat, in the gap between Clyde and Harestanes wind farms. It is scoping 33 turbines at 180-230m BTH.
2. Mountaineering Scotland is a membership organisation with more than 14,000 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, and acts to represent, support and promote Scottish mountaineering. Mountaineering Scotland also acts on behalf of the 80,000 members of the British Mountaineering Council (BMC) on matters related to landscape and access in Scotland, and provides training and information to mountain users to promote safety, self-reliance and the enjoyment of our mountain environment.

Assessment


3. Mountaineering Scotland has comments only on the proposed viewpoints, with reference to Scoping Report Question 5.2, which we have reviewed for their appropriateness to making, in due course, an assessment of the mountaineering impact of the proposed development.
4. Mountaineering Scotland endorses viewpoints at Queensberry, Lowther Hill, Hart Fell and Tinto Hill.
5. Viewpoints 3 and 10 are similar to, but do not match, those used in the proposed Daer wind farm application. We see no reason why they should be different, making comparison more difficult. In each case the Daer viewpoint location appears superior.

6. There is no proposed viewpoint on the Southern Upland Way where it crosses open hill north of the proposed development. Daer used Hod's Hill (NT0009) which we strongly recommend should also be used for Rivox.

7. There is no proposed viewpoint on the pastoral hill ridge (with several summits listed as Donalds by the Scottish Mountaineering Club) west of the Daer Reservoir. This ridge of summits will be attractive to hillwalkers. Ballencluch Law (NT935049) is the highest summit. We suggest that a viewpoint here is essential.

8. Viewpoint 15 offers an oblique view of Rivox at nearly 30km distance. We think this is very unlikely to add value to the LVIA.

Yours sincerely



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