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Dear Ms Tosun

BODINGLEE WIND FARM PROPOSAL,

ECU reference: ECU00004839

Background and Context

1. Banks Renewables has submitted an application for a wind farm of 37 turbines of 230-250m blade-tip height around 6km southwest of Tinto, South Lanarkshire.
2. Mountaineering Scotland **objects** to the proposed development on grounds of visual impact on the regionally significant and recreationally popular hills of Tinto (particularly), Dungavel Hill and Cairn Table.
3. 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.
4. Mountaineering Scotland supports the move to a low carbon economy but does not believe that this need be at the expense of Scotland's marvellous mountain landscapes. It objects only to the small proportion of proposals that are potentially highly damaging to Scotland's valuable mountain assets, consistent with its policy set out in Respecting Scotland's Mountains. This approach has been strongly endorsed by its members and by kindred organisations such as The Cairngorms Campaign, North East Mountain Trust and The Munro Society

Material considerations

5. Mountaineering Scotland's objection is on the grounds of visual impact from Bodinglee East upon the regionally significant and popular landmark hill of Tinto and the popular and locally significant hills of Dungavel Hill and Cairn Table (Viewpoints 15, 10 and 21 respectively).

6. For completeness it is noted that Bodinglee West alone would not be unacceptable in what may be regarded as a windfarm landscape in the middle distance.

7. The development site is open undulating moorland that is unexceptional in landscape terms and is set within a wider area characterised by wind turbines (cf Figure 4.1.9a), which exert a substantial and increasingly dominant visual influence upon an extensive area to the southeast and west of the application site (cf Figures 4.1.10 & 4.1.11). Turbines are also present more distantly to the north. An indication of the density of turbines locally is that Table 4.7 lists over 400 turbines operational, under construction or consented within <10km of Bodinglee.

8. Development has, thus far, respected the situation of Tinto, with the nearest operational turbines being around 8km distant (Clyde WF) to the southeast. In the southwest view from Tinto, looking towards Little Gala, the nearest turbines are around 12km distant. The application site of Little Gala, if consented, would more than halve that to 5.1km but with turbines of 'only' 149.9m BTH reaching a maximum blade-tip altitude of c.535m OD. Bodinglee would introduce a large number of very large turbines in the same angle of view, with the highest two (adjacent to Little Gala) having blade-tip altitudes of c.620-630m OD.

9. Although Bodinglee East's turbines would be seen as clearly below Tinto summit and in views from the summit be backed and flanked by more distant turbines, it is our judgement that it would diminish significantly the quality of the view and hence the experience enjoyed by hillwalkers on Tinto. This would be even more strongly experienced by walkers making a circuit using the western (Lochyloch Hill) ridge of Tinto, where the turbines would not only be closer (c.4km) but also at a significantly higher altitude than the viewer, with even some hubs being higher than the viewer.

10. Tinto is rightly called a 'landmark hill' in the EIAR, as is Dungavel (para 4.44). Their quality is recognised by inclusion in the Clyde Valley and Tinto SLA. Mountaineering Scotland cannot agree with the EIAR that the qualities of the SLA will not be significantly degraded by the indirect (i.e. visual) impact of Bodinglee (Table 4.19). Although the Bodinglee turbines would be introduced into a view that is already (taking into account consented developments) a wind farm landscape, that does not mitigate the adverse impact of the introduction of such large turbines as those proposed in close proximity, with 'close' applying both to distance and to altitude, to such a distinctive and popular hill as Tinto. On the contrary, the adverse impact is exacerbated by the cumulative impact arising.

11. The LVIA understates the impact of proximity and scale of the proposed development while overplaying the mitigating effect of existing/consented developments. It does so at both Tinto (Viewpoint 15) and Dungavel Hill (Viewpoint 10) where placing turbines 4-6km from the viewpoints is considered mitigated by the presence of smaller wind turbines at distances of c. 9-12 km in the same angle of view. There is some mitigation from the context, but not the amount claimed by the LVIA, which means the LVIA understates the scale of visual change and hence the magnitude of the proposed development's visual impact.

12. From other upland viewpoints, our concern is the impact of Bodinglee upon views to Tinto. There is a particularly detrimental effect at Cairn Table (Viewpoint 21). At present Tinto is viewed through a broad gap between wind farms. Bodinglee would occupy a significant part of that gap, appearing directly in front of Tinto. No other currently proposed development would obstruct this view in the same way. This is important because it is the only significant view from Cairn Table likely to remain 'open' in the near future. As the EIAR notes, "Under scenario 2, wind turbines would occupy much of the 360° view." (Chapter 4-97), though this ignores the visual gap westward to a subdued stretch of the Ayrshire coast, Arran sometimes visible at ≥ 70 km. The impact of Bodinglee

upon Cairn Table would be notably more adverse than the LVIA claims. The same is not the case for Culter Fell (Viewpoint 22) or Lowther Hill (Viewpoint 23), where the LVIA judgement is agreed with by Mountaineering Scotland.

13. In passing we note errors in Figure 4.2.21. (1) The baseline photography at 4.2.21a. does not match the colour-coding of the wireline at 4.2.21b in respect of visible operational turbines at Kennoxhead. (2) Figure 4.2.21c is the 160° direction though labelled 250°. There is no wireline for this quadrant. (3) The wireline at 4.2.21d is, as labelled, the 250° direction but there is no baseline photograph for this quadrant. (Incidentally, this wireline shows how a single fixed viewpoint is inadequate for hills with varied summit topography. Most walkers do not only visit the east cairn but also go to the west cairn and thus obtain an unobstructed westward view.)

14. It is a matter of judgement at what point an impact, or accumulation of impacts, either upon a single location or a wider area, becomes unacceptable. It is our judgement that Bodinglee represents that point for the highly valued Tinto and also for Dungavel Hill and Cairn Table. (We previously formed the same judgement for Tinto in respect of Little Gala.) Development closer to the western side of the Plateau Moorlands LCT would constitute a substantial increase in the influence of wind energy development upon Tinto, Dungavel Hill and the Clyde and Tinto Hills SLA. The impact upon the view to Tinto from Cairn Table, which is fated to otherwise offer a 320° panoramic view of wind farms is an additional significantly adverse impact that informs our judgement that Bodinglee, and more particularly Bodinglee East, is not an acceptable development.

Conclusion

15. Mountaineering Scotland has carefully assessed the proposed development. It would have a significant adverse visual impact upon hillwalkers on Tinto, and upon Dungavel Hill and Cairn Table. Given the regional distinctiveness, significance and popularity of these hills, such adverse impact should attract substantial weight in decision-making. Tinto, in particular, should be safeguarded in perpetuity from development in such close proximity, east of the M74.

16. Mountaineering Scotland **objects** to the proposed Bodinglee Wind Farm.

Yours sincerely



Stuart Younie

CEO, Mountaineering Scotland

