

By email to: Econsents_Admin@gov.scot

Energy Consents Unit
The Scottish Government
4th Floor
5 Atlantic Quay
150 Broomielaw
Glasgow
G2 8LU

4 June 2021

Dear Sir/Madam

Daer Wind Farm - A proposed development of 17 wind turbines, at up to 180 m in height to blade tip, southeast of Daer Reservoir, upper Clydesdale, South Lanarkshire

ECU reference: ECU00000740

Introduction

1. RWE has applied for S.36 consent for Daer wind farm, southeast of the reservoir of the same name in upper Clydesdale, with 17 turbines of 180m blade-tip height. Most turbines would be in South Lanarkshire with five in Dumfries and Galloway.
2. Mountaineering Scotland **objects** to the proposed wind farm on grounds of cumulative visual impact.

Mountaineering Scotland

3. Mountaineering Scotland is an independent association of mountaineering clubs and individuals, with over 14,000 members who are hill walkers, climbers and snowports tourers. It was established in 1970 as the national representative body for the sport of mountaineering in Scotland. It is recognised by the Scottish Government as representing the interests of mountaineers living in Scotland.
4. It also acts in Scotland for the 80,000 members of the British Mountaineering Council, which fully supports Mountaineering Scotland's policy relating to wind farms and contributes financially to its policy work.
5. Mountaineering Scotland agrees with the need to move to a low carbon economy but does not believe that this transition need be at the expense of Scotland's marvellous mountain landscapes. It objects only to the small proportion of proposals that are potentially most damaging to Scotland's widely-valued mountain assets, consistent with its policy set out in *Respecting Scotland's Mountains*. This 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

Context

1. Any assessment of the potential impact on mountaineering of the proposed Daer wind farm is inevitably shaped by the context of wind farm activity in the area. Immediately north of the site is the Clyde wind farm (south of the M74), with two small adjoining developments consented under separate ownerships. A little to the south of the site lie the conjoined Harestanes and Minnygap wind farms.

Policy

2. The enthusiastic support of the Scottish Government for onshore wind deployment is well understood. However policy is equally clear that: "The aim is to achieve the right development in the right place; it is not to allow development at any cost." (Scottish Planning Policy 2014, Para 28) More recent policy documents restate support for onshore wind in the context of political declarations of a climate crisis, while placing a much increased emphasis on *offshore* wind. No policy or advisory documents to date suggest that the principle of 'the right development in the right place' has been abandoned or that the weight to be attached in the planning balance to energy policy relative to landscape protection has changed to such a degree as to make a site acceptable in policy terms if its landscape and visual impact – cumulative in this case – is unacceptable.
3. The applicant overstates the policy support for changing the planning balance for onshore wind farm applications in para 4.3.28. The Scottish Government has not stated a policy intention of "enforcing a favourable planning and consenting scheme for onshore wind". This was a *recommendation* by the Committee on Climate Change. It is notable that the NPF4 Position Statement (November 2020), which postdates this recommendation, takes up another CCC recommendation on "supporting repowering and life extension of existing wind power" (p.10) but makes no mention of changing the existing planning balance for new sites to be even more favourable than it already is.
4. It is notable that the Scottish Government's 2020 target to generate the equivalent of Scotland's electricity consumption from renewable sources was very narrowly missed (on provisional data) not because of insufficient consented schemes but because of the failure of developers to progress the many unbuilt consented schemes timeously.
5. Daer appears to be in conflict with most of the policies that led South Lanarkshire and Dumfries and Galloway Councils to object to the (now refused) wind farm proposals for the central Lowther Hills (Harryburn and North Lowther).
6. Daer is within South Lanarkshire's Leadhills and Lowther Hills Local Landscape Area and Dumfries and Galloway's Thornhill Uplands Regional Scenic Area. The relevant landscape capacity studies suggest that there is no capacity in this landscape for large turbines.

Visual assessment

7. The site itself is unexceptional. However, to the west and south there is an L-shape of seven Donalds (hills in Southern Scotland over 2000 feet high) from Comb Law at the northwest to Queensberry in the southeast. These are pleasant hills with a natural feel to them, without the man-made clutter that mars the central Lowthers. They would all have substantial visibility of Daer. However, all already have visibility of Clyde and often of other wind farms as well. **The adverse impact of Daer is not simple visibility but increased proximity and cumulative impact.**

8. There are 13 viewpoints relevant to a mountaineering assessment (out of 18 in total), three of which are on the Southern Upland Way.

VP N	Viewpoint	Km	Applicant assessment	MScot assessment
13	Daer Reservoir SUW	1.1	Significant	Agree: Dominant presence on low-lying part of SUW
12	Hods Hill - SUW	1.6	Significant	Agree: SUW in a corridor between Daer and Clyde at close quarters
17	Queensberry	3.3	Significant	Agree: Although some of Daer might be acceptable, backed by the dense Clyde wind farm, some turbines appear too close, too high, or visually separate from the rest of Daer and from Clyde
10	Comb Head	8	Significant	Agree: Daer spreads across a view currently without turbines
6	Annanhead Hill	8	Not significant: screening and low density of layout.	Disagree: Significant due to Daer occupying gap between Clyde and Harestanes with irregularly spaced, backclothed and skylined turbines
7	Chalk Rig Edge	9	Not significant: screening and low density of layout.	Disagree: Significant like VP 6
8	Green Lowther	9	Significant	Agree: Daer spreads across a view currently without turbines
9	Lowther Hill	10	Significant	Agree: Daer spreads across a view currently without turbines
15	Craig Fell SUW	11	Not significant	Neutral. It occupies the gap between Harestanes and Clyde but Clyde is not strongly visible and landscape quality is only moderate seen from this (eastern) direction
18	Hart Fell	13	Not significant	Disagree: Significant like VP 6
3	Culter Fell	22	Not significant: distance and existing wind farm context	Agree
1	Tinto	26	Not significant: distance and existing context	Agree
2	Pykestone Hill	29	Not significant: distance and existing context	Agree mainly on distance

9. We agree with the LVIA that the closest hills (or SUW viewpoints) would be significantly affected. Likewise the Lowther viewpoints. Daer would appear as a separate development but notably extend the horizontal wind farm landscape by occupying the gap between the extensive Clyde and Harestanes wind farms. This gap is currently c.11km. Daer would be c.6km long within this, leaving a gap of only c.2km to Clyde and c.3km to Harestanes.
10. We disagree that Annanhead Hill, Chalk Rig Edge and Hart Fell, all immediately north of the Devil's Beef Tub, would not be significantly affected. From all three, at distances of 8-13km, Daer would occupy the current separation gap between Clyde and Harestanes with an unevenly

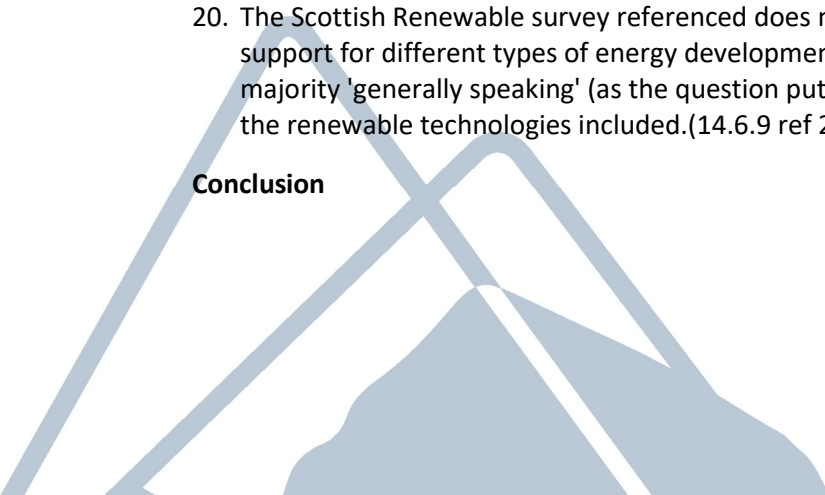
spaced, distracting mix of backclothed and skylined turbines. The baseline photography for these locations is markedly hazy. This means the visualisations do not represent the 'worst case' visibility.

11. Adverse impacts at Craig Fell are not as strong as those for other viewpoints.
12. We agree with the LVIA that the three most distant viewpoints are not significantly affected. Daer would simply blend in as part of the already extensive wind farm landscape with the minor separation from Clyde not apparent.
13. Summing up, Daer would have an adverse cumulative impact when seen from the west, north and east. From the west it would be perceived as part of a single wind farm landscape with Clyde. From the north and east, it would be perceived as part of a single wind farm landscape with Clyde and Harestanes. From all directions, the small separation gap(s) would be less obvious than the spread of turbines.

Socio-economics

14. Mountaineering Scotland takes a careful approach to the assessment of tourism and recreation impact, specific to the landscape around a proposed development and informed by knowledge of the local context and of the specific segment of the tourism and recreation market most at risk from inappropriate wind farm developments: hill-walkers and other landscape-oriented visitors. In areas of high landscape quality visited by tourists attracted specifically by such quality, there is the potential for harm to tourism and recreation.
15. Our assessment is that the main effect of Daer wind farm would be on day recreation rather than over-night tourism. This is based (1) on the existing level of wind farms in the wider area which will already have displaced tourists averse to holidaying in such a setting; and (2) on the easy accessibility from the Central Belt of these modest but attractive hills for walking, not hemmed in by plantations or wind turbines.
16. We need to point out some misleading statements in the EIAR.
17. The applicant states: "Recreational groups such as The British Horse Society and the Mountaineering Council of Scotland have also been consulted in relation to the Proposed Development." (para 14.6.2) We are unaware of any approach to Mountaineering Scotland other than the standard S.36 scoping and application consultations.
18. The statistics on tourism in Dumfries and Galloway are misleadingly presented. (para 14.6.5). The increases cited were driven by day visitors. Overnight tourism dropped by 1% for visits, 6% for nights and 4% for income. Dumfries and Galloway is a large area and there is no information on the pattern of tourism within the area and how change relates to wind farm development.
19. Reference 19 (para 14.6.9) is not dated 2018 but 2008. There is no up to date government-sponsored research on wind farms and tourism and recreation. Indeed, the government appears determined not to risk receiving unacceptable results by not commissioning research.
20. The Scottish Renewable survey referenced does not refer at all to tourism but simply to *general* support for different types of energy development. Onshore wind, while supported by a majority 'generally speaking' (as the question put it) actually had the lowest level of support of the renewable technologies included.(14.6.9 ref 20).

Conclusion



21. The proposed development would lead to a coalescence between the currently distinct South Lanarkshire wind farm landscape and the western Annandale wind farms. It would affect a largely unspoilt range of Donalds in its immediate vicinity.
22. Mountaineering Scotland **objects** to the proposed Daer wind farm on grounds of cumulative visual impact.

Yours sincerely

A handwritten signature in black ink that reads "Stuart Younie". The signature is written in a cursive, flowing style.

Stuart Younie

CEO, Mountaineering Scotland

