

By email to: Econsents_Admin@gov.scot

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

5th May 2026

Dear Sir/Madam,

Re: Application for the proposed Watchman Energy Park ECU00006030

Background and Context

1. Mountaineering Scotland is a membership organisation with 16,000 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.
2. Renewco Power Ltd has submitted an application for a wind farm, 'Watchman Energy Park', of 13 turbines of 240m blade-tip height on the Donalds (hills in lowland Scotland that exceed 2,000 feet in height) west and southwest of the Daer Reservoir, 7km south of Elvanfoot, South Lanarkshire.
3. Mountaineering Scotland **objects** to the proposed development on grounds of visual impact on areas of mountaineering (hillwalking) interest, not least because of its cumulative impact.

Policy

4. There is no dispute between the applicant and Mountaineering Scotland on the importance of climate change and the significance that both UK and Scottish governments attach to increasing onshore wind electricity generation. It is acknowledged that *NPF4* and other Scottish policies and strategies such as the *Onshore Wind Policy Statement (2022)* and the *Draft Energy Strategy & Just Transition Plan (2023)* are highly supportive of onshore wind development. Furthermore, *NPF4* gives renewable energy developments 'National Development' status which means the principle of development (the 'needs case') is taken as established.

5. Notwithstanding the strong policy support for onshore wind, both NPF4 (page 7) and the OWPS (para 3.6.1) reiterate from previous policy that the goal is the right development in the right place. It is Mountaineering Scotland's view that the location of the proposed development is not the right place. It has come to this conclusion based on an assessment of visual impact upon mountaineering assets and interests.

6. There is nothing in current national policy that seeks to promote development in inappropriate locations and a number of proposed wind developments have indeed been refused consent under NPF4. Not every individual proposed onshore wind farm is mission-critical for the achievement of national policy goals given the context of substantial unbuilt consented capacity, a large and undiminishing stream of new proposals coming forward for consent, and an equally large and undiminishing stream of pre-planning (Scoping) proposals¹. This point is made simply to show that many alternatives to the proposed development are coming forward in less damaging locations and at the scale required to provide rapid progress towards net zero if only developers and the construction industry could keep pace. The renewables industry argues that faster consenting is key to meeting onshore wind targets but the data suggests that the real bottlenecks are slow post-consent investment decision-making and construction (including grid connections). The urgency of taking action on climate change, stressed so much in S.36 applications, seems to drop down applicants' priorities once consent has been obtained. Mountaineering Scotland has observed, however, that it is very rare for consented onshore capacity to not be built eventually even when many years after consenting.

7. It should be noted that, despite the Planning Statement repeating the EIAR's statement that "The Proposed Development has a grid connection offer for 2036" (EIAR para 1.2.3; also Planning Statement para 1.5.22), which the EIAR refers to as a "reasonable timeframe" (para 3.3.13), the Planning Statement attempts to justify the application with reference to the Scottish 2030 onshore wind targets. For example, "there is a substantial shortfall to address in order to attain [the target] and projects that are not yet in the planning system are unlikely to provide installed capacity by 2030. This underlines the importance of **the benefits that the Proposed Development can deliver – namely near-term delivery ...**" (Planning Statement para 2.7.23, added emphasis). Such justification is clearly meaningless when no grid connection for the proposed development will exist until the mid-2030s. Note also that Figure 3-1 of the *Maximising Socio-Economic Benefits Report* accompanying the application shows construction not even starting till 2033.

8. For the avoidance of doubt, the foregoing is not intended to be read as an argument against increased onshore wind capacity in the right places. It is simply intended to show that the present application is one of many applications and pre-planning proposals that could contribute to that capacity, many of which are in less harmful locations. The present application is explicit that it will only come onstream in the mid-2030s. Despite this the Planning Statement conclusion could misdirect the decision-maker by containing multiple references to 2030 targets and only one to the 2045 net zero target, which would be the more appropriate time frame for consideration of the proposed development.

¹ At October 2025 there was 2.0GW of onshore wind under construction, 5.6GW consented awaiting construction, and 10.5GW in planning awaiting decision, as well as innumerable pre-planning proposals. There is some duplication between consented and in-planning capacity where consented projects have a revised application in planning, usually to install taller turbines. Similarly, where an application is for repowering the existing operational capacity should be netted off the application capacity but government statistics do not do that. Notwithstanding these caveats, on any reading there is a very substantial development pipeline and it has been increasing in recent years while the pace of building remains low. No year has exceeded 1GW becoming operational except for 2017; in 2024 only 699MW became operational and a remarkably low 139MW in the first three quarters of 2025 (cf also Planning Statement paras 2.3.35 and 2.4.9). (All data from Scottish Government Energy Statistics Hub webpages accessed 1 April 2026).

9. In government policy, strategic significance has been attached to onshore wind development, not least through designation of the sector as a National Development. It is, however, the sector as a whole to which strategic significance attaches, not to any individual proposal unless there were to be a shortage of proposals, which there demonstrably is not. The failure of a small number of unsuitable projects will not have a material impact on the achievement of policy goals through the cumulative effect of a large number of less unsuitably located projects.

10. The detrimental effect of development on the proposed site is sufficiently substantial and significant as to outweigh the benefits claimed for the development. As well as generating electricity, a range of other benefits are claimed. These should be afforded very little weight, not because they are unimportant but because almost any onshore wind development in Scotland delivers these benefits.

- Ecological enhancement is a mandatory requirement for all development under NPF4 so all proposals now comply. Such enhancement and restoration is very welcome but it need not, and should not, be achieved at the expense of consenting development in an inappropriate location.

- Many wind farm applications include a small amount of battery storage which, as here, is modest compared with grid-scale stand-alone storage now being built elsewhere.

- All construction generates economic activity.

At a Scottish level all these positives are gained no matter where development takes place. The detriments are site-specific whereas the benefits are not. Realising the benefits depends on a continuing flow of suitable projects across the country, which clearly there is, not on every individual project being consented regardless of the level of detriment.

11. The Planning Statement refers to two recent S.36 consents (para 2.12.6 *et seq*), to neither of which Mountaineering Scotland objected, but does not draw attention to a crucial qualification in the decision quoted at para 2.12.7, "the ongoing need for more onshore wind development and capacity in locations across Scotland **where it can be accommodated in appropriate locations.**" (added emphasis).

12. There is no requirement in policy, nor is it necessary for addressing the climate emergency, to consent development proposals that are in inappropriate locations. Mountaineering Scotland submits that the proposed development is not acceptable in planning terms - the visual detriment of the proposed development, and not least its intrusion into the gap between extensive clusters of wind farm development to north and south, outweighs its benefits - and therefore consent should be refused.

Landscape and Visual Impact

Preamble

13. For all the appearance of objectivity, professional landscape and visual impact assessments are ultimately subjective judgements. In Mountaineering Scotland's experience, assessments commissioned by developers repeatedly downplay the impact of proposed development upon the mountaineering experience. Mountaineering Scotland, with an assessment team composed of, informed by and representing experienced 'consumers' of mountain landscapes, believes its judgement of impact provides a complementary and equally valid perspective.

14. Mountaineering Scotland is focussed on its members' interests: the enjoyment of mountaineering (which includes hillwalking) in a high-quality upland environment. Hence its

main concern in relation to wind farms is adverse impact upon visual amenity and the perceptions of nature, wildness, space and remoteness that accompany mountaineering activity in areas such as the proposed development area.

15. Original baseline photography for some locations was not undertaken by the applicant due to 'weather conditions' (TA 4.3 paras 4.3.4.6 & 4.3.4.7). Prior photography available to the applicant was used for some of these. The use of baseline photography between 18 months and nearly three years old is less than ideal. However, it shows contempt for the decision-maker that no baseline photography is provided at all for some locations, including some of the closest hill locations to the proposed development².

16. Even for those viewpoints with contemporary baseline photography, the quality is often poor. It is generally hazy, allowing photomontaged turbines to be shown as much less visible than would be the case in clear conditions. The 'worst case' scenario is thus not presented. Indeed, Mountaineering Scotland would contend that the photomontages are so poor that they should not be taken seriously and that reliance should be placed on the wirelines and fieldwork alone, with the baseline photography only used as context.

Assessment

17. Mountaineering Scotland's interest in this application is triggered by both its individual and cumulative potential impact.

18. Watchman Energy Park would sit across the ridged upland west of the Daer Reservoir with turbines located on the upper slopes and ridgelines around Comb Law (a Donald³) and Rodger Law (a Donald), the latter turbines approaching within 1km of Ballencleuch Law (a Graham⁴ and Donald). The highest altitude turbine would sit virtually at the summit of Rodger Law (688m OD). This would have blade-tip altitude of c.920m OD, making it possibly the highest altitude object between Ben Lomond and Skiddaw (though there may be other turbines in Southern Scotland competing for this title). As well as the hills already mentioned, two further Donalds lie around 3km to the south (Scaw'd Law, Wedder Law) and the landmark Queensberry (also a Donald) is within 7km southeast of the nearest turbine. The Lowther hills ridge, with five Donalds, lies c.5-7km to the west. The proposed development would be prominent from all these hills and more distantly by virtue of its altitude and its blade-tip turbine height.

19. The proposed development is located within the Leadhills and Lowther Hills Special Landscape Area, in close proximity to the Thornhill Uplands Regional Scenic Area and in clear view from the Moffat Hills RSA, Tweedsmuir Uplands SLA and Talla – Hart Fell Wild Land Area. These designations are official recognition of the quality of the landscapes visually affected by the proposed development.

20. The host region is not lacking in wind farms, as Figure 4.12 shows, and only small areas, typically valley bottoms, lack theoretical visibility of at least one wind farm (cf. Figure 4.15).⁵ In upland areas the visibility is almost invariably an unscreened actual, not theoretical, and it is common in this region for multiple wind farms to be in sight, often in different directions. In the immediate area, the operational Clyde and Clyde Extension wind farms are

² Contempt is also shown by the choice of location for the photography at Viewpoint 4. A location only a few metres further south would have eliminated the foreground chevron signs that occupy c.18% of the baseline photograph (Fig 4.24.1) and one third of the 58.5° photograph (Fig 4.24.6), completely distorting the view actually experienced by southbound road users.

³ Scottish hills over 2000 feet (610m) south of the Highland boundary fault, as listed by the Scottish Mountaineering Club.

⁴ Scottish hills 600-762m high with a drop of at least 150m on all sides, as listed by the Scottish Mountaineering Club.

⁵ The exception to this is the area in the east of the LVIA study area from which turbines are excluded to protect the functioning of the Eskdalemuir Seismological Array.

sufficiently co-extensive as to form a local wind farm landscape to the NNE of Watchman. To the SE, operational Harestanes and Minnygap form a single cluster. Wind farm proposals in planning and pre-planning could extend this cluster to the south and lead to another local wind farm landscape across the Ae Forest.

21. It is the space between these north and south developments that is of particular concern to Mountaineering Scotland. The 'Daer gap' is important to preserve a balance between an area of open undeveloped character and the developed wind farm character to the north and south. However, the gap has become a focus for wind farm developers. Daer and Rivox applications are adjacent to one another on the east (Rivox) and west (Daer) slopes of the watershed west of the Daer Reservoir.⁶ To their south, Kinnelhead scoping straddles that watershed from east to west. Including Watchman, the four developments propose 85 turbines of blade-tip heights between 180m and 250m, filling the gap with roughly 10km square of turbines.

22. There are differences in the detailed visual impacts of the different proposals but these are minor compared with the major similarity: any one of the proposed schemes would be a major visual intrusion into the Daer gap, eliminating its open undeveloped character which presently contrasts sharply with the turbines arrayed to north and south of it. Any one scheme would significantly intensify and extend the influence of wind turbines between the existing north and south turbine landscapes. Any two would be perceived as totally eliminating the undeveloped space and coalescing the presently separate north and south developments into a single wind farm landscape, stretching 40km from north to south. This is partially acknowledged in the LVIA (para 4.5.57) but without making explicit the full north-south extent of the wind farm landscape that would be created by development in the gap.

23. The ZTV is complex in detail but has a simple broad concentric pattern: (1) an area of close visibility out to the surrounding uplands (to c.6-7km), (2) an area of limited visibility screened by the immediately surrounding hills except where valleys break the pattern, and (3) an area of wide visibility from more distant uplands at distances upwards of 10km. The LVIA of the EIA regards the impact of the proposed development on the five upland Viewpoints in the first zone as Significant, Major and Mountaineering Scotland concurs. It regards the impact on the six upland Viewpoints in the third zone as Not significant, Minor – Mountaineering Scotland's judgement differs for four of these six.

24. The table below assesses the visual impact at the specific Viewpoints relevant to Mountaineering Scotland's interests. Where judgements differ, that of Mountaineering Scotland is in bold.

Viewpoint (nearest turbine)		LVIA assessment	Mountaineering Scotland assessment
1	Tinto (26km)	Not significant (Minor)	Not significant (Moderate). Tall hill-top turbines would, despite the distance, be prominently visible, extending the western edge of the wind farm landscape SE of Tinto towards the spreading wind farm landscape SW of it. It would contribute, with other proposals, to spreading turbines across nearly 180° of the horizon; however, proposals other than Watchman would be the main contributors to filling the gap. (Note that Figure 4.21.3 omits the operational turbines around Douglas and Whitelee WFs, visible in the baseline photography, from the

⁶ Mountaineering Scotland has objected to both on similar grounds to the case presented here.

			wireline and applications and consented developments in that area.)
2	Broad Law (25km)	Combined in one assessment Not significant (Minor)	Agree. Tall hill-top turbines would, despite the distance, be prominently visible, but on the skyline behind layers of operational and consented turbines.
3	Culter Fell (23km)		Agree. Tall hill-top turbines would, despite the distance, be prominently visible, but on the skyline behind layers of operational and consented turbines.
6	Annanhead Hill - Annandale Way (12km)		Significant (Moderate). Tall hill-top turbines would be prominently visible on the skyline (notwithstanding the photomontage attempting to suggest otherwise – cf the baseline photography showing how clear the Clyde turbines are at half the distance but also only just over half the height). It would notably extend the Clyde wind farm landscape further south. The interaction of distance, turbine size and the depth of the Clyde wind farm would mean Watchman and Clyde would not be perceived as separate developments (cf TA 4.3.6.7).
7	Hart Fell (17km)		Significant (Moderate). Tall hill-top turbines would, despite the distance, be prominently visible on the skyline (notwithstanding the useless photomontage). It would notably extend the Clyde wind farm landscape further south, reducing the gap between it and the Harestanes-Minnygap cluster.
8	Lowther Hill (5.4km)	Combined in one assessment Significant (Major)	Agree. The turbines would be prominent at near distance and high altitude within an undeveloped section of the landscape.
9	Comb Head (3.6km)		Agree. The turbines would be prominent at very near distance and high altitude within an undeveloped section of the landscape.
11	Hods Hill – Southern Upland Way(5.4km)	Combined in one assessment Significant (Major)	Agree. The hilltop turbines would be dominant features, intruding at a location where the observer can currently enjoy looking away from the Clyde wind farm landscape to a more 'rural' scene with turbines only distantly visible, appearing low down and small.
12	Southern Upland Way - Daer Reservoir (2.6km)		Agree. The turbines would loom across the forestry over the viewer at a point where only a small part of the Clyde WF is currently visible in the opposite direction, giving the viewer the feeling of a constant presence of turbines along this part of the route.
13	Southern Upland Way - Roman Reivers Route SE of Moffat (15km)	Not significant (Minor)	Not significant (Moderate). The turbines would intrude into the gap separating Harestanes and Clyde, though neither is strongly visible from this low vantage point. They would not foreground Queensberry or, narrowly, the central Lowther Hills.

14	Queensberry (6.6km)	Significant (Major)	Agree. The turbines would appear separate from, but in the same angle of view as, Clyde WF. The gap between Watchman and Clyde south of the M74 would be similar to the gap between the latter and Clyde north of the M74, making it appear as an expansion of the wind farm landscape to the north. With Harestanes-Minnygap at the viewer's back, the Watchman hill-top turbines would dominate the foreground and obscure views to the Central Lowthers (which is not brought out well by the wireline).
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The Mountaineering Experience

25. The 'mountaineering experience' is a complex phenomenon. Mountaineers have multiple motivations, both individually and collectively. However, even a cursory glance at hillwalking magazines or chat on the hill shows that quality of visual experience (the view, the scenery) is important. So too are the subjective feelings invoked by the physical experience of perceived remoteness, wildness, emptiness and engaging with hard terrain. The experience is enhanced by engagement with nature both visually and aurally. The resultant benefits to physical and mental health are increasingly recognised and promoted.

26. The applicant's *Maximising Socio-Economic Benefits* report purports to consider the motivations of visitors yet at no point considers hillwalkers or hill-walking as an activity undertaken by a significant number of (mostly day) visitors from (primarily) Central Scotland.

27. As the national membership organisation for mountaineering in Scotland, Mountaineering Scotland has a good sense of what motivates and disincentivises mountaineers through its daily contact with a wide range of hill-goers. The evidence from surveys of mountaineers/hill-walkers – not of general tourists – suggests that some activity is being displaced from areas with wind farms to areas without.

28. Mountaineering Scotland undertook a survey in 2016 and repeated the same question in 2023 asking respondents if their actual behaviour had changed in response to wind farms. The results were statistically the same for the two years, analysed using 95% confidence intervals. Averaged, they suggest that 20% of hillwalkers would avoid an area with wind farms and go elsewhere while 42% would still go to an area with a wind farm but experience diminished enjoyment. It could be hypothesised that this latter group might then make fewer repeat visits as a consequence. In contrast, only 2% would go to such an area more often while it would have no impact on 35%⁷. The surveys did not ask about motivations directly, but the behavioural responses recorded and the anecdotal evidence from talking to hillwalkers suggest that they include a strong visual element.

29. The *Outdoor Access Management Plan* (TA 9.2) accompanying the application makes reference to Strava data (Section 4.2). It should be noted that only a small minority of hillwalkers use Strava, which is more popular in Scotland amongst cyclists, runners and long-distance trail users. Furthermore, the focus on paths shows a lack of understanding of how hill-walkers behave. There are no 'paths' to e.g. Ballencluch Law: it is reached by following sheep or human trods, quad tyre lines, or simply walking on the vegetation.

30. It is proposed in the *Outdoor Access Management Plan* that:

"a Public Access Management Area (PAMA) would be defined. This area would generally align with the construction working footprint ... For health and safety reasons during the

⁷ Sums to 99% because of rounding.

construction phases, the statutory right to recreational activities under the Land Reform Scotland (2023) ... would be temporarily suspended within the designated PAMA." (para 6.1.2)

31. Mountaineering Scotland understands the need for safety where construction is active. However, the term 'construction working footprint' is undefined. It has been Mountaineering Scotland's recent experience that entire 'red line' sites - sometimes very large areas - are being completely closed to public access for the whole duration of construction, blocking routes to and between hills even when no construction is taking place within their vicinity. It is ambiguous within TA9.2 Section 6.1 as to whether that is intended here or not. Again, the focus on paths and signage at site entrances ignores the free-ranging nature of hillwalking. A more proportionate approach is to operate exclusions only in the vicinity of active construction when it is taking place. This should be required by condition, if the decision is to grant consent.

32. The above assessment shows that the proposed Watchman Energy Park would have a significant adverse visual impact in its own right but also, and perhaps more importantly, upon an important open gap between extensive operational and consented wind farms. Intrusion into this gap would move a very large area towards being a wind farm landscape, as the northern part is already. Watchman's impact is inherent in its location and cannot be mitigated by design.

Conclusion

33. The proposed development is contrary to national policy (NPF4). Its siting would not 'preserve natural beauty'. It would have a significantly adverse impact upon the visual amenity and overall experience of those visiting the surrounding hills, and sometimes glens. It would also occupy the important open ground of the 'Daer gap' between an existing wind farm landscape to the north and a large cluster to the south. Its potential adverse impact would far outweigh its benefits.

34. Mountaineering Scotland **objects** to the proposed Watchman Energy Park.

Yours sincerely,



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