



The Mountaineering Council of Scotland

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Debbie Flaherty
Senior Case Officer
Energy Consents and Deployment Unit
The Scottish Government

Dear Ms Flaherty

SCOPING OPINION REQUEST FOR PROPOSED SECTION 36 APPLICATION FOR HARRYBURN WIND FARM, LOWTHER HILLS, SOUTH LANARKSHIRE

1. Introduction

We welcome the opportunity to comment on issues to be considered in the environmental impact assessment of the proposed Harryburn Wind Farm by RWE Innogy. The Mountaineering Council of Scotland assesses proposed developments in terms of their impact on Scotland's mountain assets and the mountaineering experience. For wind farms, this mainly means visual impact and this is the focus of our response. We also comment briefly on some other issues.

We presume that references in the Scoping Report to Scottish Government "Local Energy and Consents" actually refer to the Energy Consents and Deployment Unit. We are not aware of any name change and the website continues to use the latter name.

2. The Mountaineering Council of Scotland (MCofS)

The MCofS is an independent organisation with 13,000 members who are hill walkers, climbers and ski tourers. It was established in 1970 as the national representative body for the sport of mountaineering in Scotland. We are recognised by the Scottish Government as representing the interests of mountaineers living in Scotland. We also act in Scotland for the 80,000 members of the British Mountaineering Council (BMC), which fully supports our policy relating to wind farms and contributes direct financial support to our policy work.

The MCofS recognises the need to move to a low carbon economy but it does not believe that this transition need be at the expense of Scotland's marvellous mountain landscapes. It objects only to proposals regarded as potentially most damaging to Scotland's widely-valued mountain assets, consistent with our policy as set out in our document *Respecting Scotland's Mountains*.

3. Specific Comments

There is mountaineering interest across the Southern Uplands, mostly undertaken as day recreation, including hillwalking and skiing in season.

The hills of interest in this area include those classed as Donalds (hills over 2,000' (610m) in the Southern Uplands) as well as some lower popular hills, such as Cairn Table. The proposed development area sits between areas of substantial existing operational and consented development – the extensive Clyde wind farm to the east, a cluster of individual developments to the north and northwest, another cluster to the southwest, and the Ae forest cluster to the southeast. The proposed development could thus be a significant infilling of one of the few major gaps in the pattern of 'rolling hills with high altitude wind farms' already established across much of the Southern Uplands in Dumfries & Galloway and South Lanarkshire. The impact of this infilling must be fully assessed.

Cumulative visual impact will be a significant consideration and probably the major factor influencing future MCoFS response to any wind farm application in this area.

We note that Figure 3 includes an unnamed 'in planning' application adjacent to the proposed development. We think this may be the North Lowther wind farm which is at the scoping stage, in which case it is located too far north on the map.

The development proposed is of up to 27 turbines of up to 150m blade-tip height (BTH). The scoping indicative layout shows turbine bases at c.440-580m OD. At a BTH of 150m, the blade-tips would potentially reach c.730m OD. This would be higher than all the summits in the Lowther hills area apart from Green Lowther, the highest at 732m and itself crowned by NATS aerials. Indeed, the hub height of the proposed turbines would exceed all summits within the proposed development area with the narrow exception of Dun Law. The ES will have to assess whether such visual dominance is compatible with retaining hillwalking interest in the Lowther Hills.

Ten of the proposed 20 viewpoints are listed as covering walkers (visual receptors). We welcome this recognition of the significance of hillwalking interests in the area. However some of the proposed viewpoints are at a distance where photography is an inadequate tool for demonstrating a potential effect. We would suggest that Pykestone Hill, at 26km, is replaced by Dun Law and/or Louise (Lousie on OS maps) Wood Law, both of which are listed Donalds and both of which are within the development site. We also note that north-western viewpoints will see the proposed development through the extant Clyde and Crookedstane wind farms. This is not the angle from which the distinct impact of the proposed development can best be judged. We would suggest that an elevated proximal south-west viewpoint would give a clearer sense of impact. For example, the Lowther Hill road as it rises across Stake Hill to intersect the Southern Upland Way (NS8812).

Sequential analysis of wind farm visibility over the full length of the Southern Upland Way would be a useful contribution to the assessment of cumulative impact on tourism resources in Southern Scotland. Individual wind farm applications consider 'their' section of the SUW but the overall

effect is never considered.

It is not clear why the footpaths referred to at the bottom of p.83/top of p.84 are expected to be of low sensitivity.

We note the intention to draw on the outdated Glasgow Caledonian University (2008) report. Since major receptors of the proposed development would be hill-walkers (and skiers in season), we suggest that their attitudes specifically should be considered.

Such evidence is available at *Wind Farms and Changing Mountaineering Behaviour in Scotland* (MCofS, March 2014). To pre-empt a possible error we find repeatedly made in applications, we would point out that the GCU report was incorrect to claim that walking/hill-walking tourists held more favourable attitudes than average towards wind farms. A proper analysis of the GCU data, with confidence intervals, shows - as does the detail of the report itself - that there was no significant difference between tourists who gave their main activity as walking/hill-walking and the rest of the sample. For reasons known only to themselves the authors of the report ignored their own analysis and stated elsewhere in the report and in the summary that there was a difference.

We also suggest that consideration be given to the potential impact of any proposed development on community-led recreational activities, including those of the ski club which is responsible for the management of outdoor facilities on Lowther Hill.

4. Conclusion

We hope that addressees consider these comments helpful and look forward to receiving an acknowledgement of safe receipt of this letter.

Yours sincerely

David Gibson
Chief Executive Officer