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10 March 2025

Dear Sir/Madam

**BLAIR HILL WIND FARM PROPOSAL**

**ECU reference: ECU00004878**

**Introduction**

1. Renewable Energy Systems has submitted an application for a wind farm at Blair Hill, north of Newton Stewart, of 14 turbines of 210-250m BTH (92MW capacity).
2. Mountaineering Scotland **objects** to the proposed wind farm development on grounds of visual impact on the nationally significant core Galloway Hills, on the southern flank of which the proposed development would be sited.

**Mountaineering Scotland**

3. Mountaineering Scotland is a membership organisation with 16,000 members and is the only recognised representative organisation for hill walkers, climbers, mountaineers and snowsports 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. In responding to planning applications, Mountaineering Scotland's focus is its members' interests: the enjoyment of mountaineering (which includes hillwalking) in a high-quality upland environment. Hence its main concern regarding wind farms is the potential for adverse impact upon visual amenity.

**Policy**

5. 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 currently attach to increasing

renewable 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 very highly supportive of onshore wind development. Notwithstanding this, 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. This accords with Mountaineering Scotland's approach to assessing development planning applications, which is to ask, 'Is this the right location for this proposed development?' In most cases it is, but not all.

6. There is nothing in current national policy that seeks to promote development in inappropriate locations and proposed wind developments have been refused consent under *NPF4*. It is Mountaineering Scotland's contention that the proposed Blair Hill site is not the right place for a wind farm, as set out below in its assessment of visual impact and the consequences thereof for the mountaineering experience. It fails to satisfy *NPF4* Policy 11.e.ii.
7. It also fails as an appropriate location against Dumfries and Galloway's local policy insofar as this is informed by the *Dumfries and Galloway Wind Energy Landscape Sensitivity Study* adopted June 2017, revised February 2020, and the October 2024 *Consultation Draft Dumfries and Galloway Wind Energy Landscape Sensitivity Study: Assessment of Larger Wind Turbines*. Of the 'Rugged Granite Upland with Forest<sup>1</sup> – Merrick and Glentool areas' within which all but two of the turbines would be located, the 2020 revision states: "*There is no scope for the large, medium and small-medium typologies (turbines >20m) to be sited within this character type without incurring significant and adverse impacts on the adjoining highly sensitive Rugged Granite Uplands [in which the hills of concern to Mountaineering Scotland are located] and on wildland character.*" (p.386). Similarly the 2024 draft states: "*This typology [turbines 150-250m tall] would have a significant and adverse effect on the special qualities of the RSA and in particular on the wider setting of the dramatic and scenic Galloway Hills. Qualities of wildness and the experience of recreational users would be adversely affected by wind farm development in these landscapes.*" (p.226) Also, for the 'Rugged Granite Upland'<sup>2</sup> which, as already noted, contains the hills of concern to Mountaineering Scotland: "*Additional wind turbine development should be sited sufficiently far away from these uplands to avoid significantly exacerbating visual intrusion and a perception of 'encirclement' and/or domination which would diminish the sense of wildness and the value associated with these special upland areas.*" (p.219, added emphasis)
8. As the assessment below shows, the the proposed development is clearly at odds with the findings of the Landscape Sensitivity Studies and hence cannot be regarded as supported by the Dumfries and Galloway Local Development Plan (2019) which, although dated, is a material consideration in determining an S.36 application. (It is assumed that the applicant's reference to the South Ayrshire LDP (2022) in paragraph 4.1.4 of the Planning Statement is an error.)

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<sup>1</sup> Now called Rugged Uplands with Forest - Dumfries and Galloway (LCT 181) cf EIAR Table 6.8.

<sup>2</sup> Now called Rugged Uplands - Dumfries and Galloway (LCT 180) cf EIAR Table 6.8.

9. Mountaineering Scotland's understanding is that designation as a National Development means the 'needs case' does not have to be restated in every planning application. Notwithstanding this, the applicant's Planning Statement spends as long reiterating the generic needs case as it does setting the specifics of this particular location against planning policy, and even the latter discussion also contains much that relates to wind development generally rather than the location- and site-specific issues raised by the proposed development.
10. Mountaineering Scotland does not argue against more onshore wind capacity being consented; but it strongly contends that not every individual proposal is as vital as the Planning Statement here would have the decision-maker believe. There are very many alternative locations. Some are already consented, with 7.2GW of onshore wind capacity in Scotland awaiting construction (with only 1.9GW of that under construction). A further 7.5GW is within the planning system. (Statistics from Scottish Energy Statistics Hub, accessed 17 December 2024.) There are very many further schemes at scoping/pre-application. In the face of such a wealth of potential generation capacity, every single scheme cannot realistically be argued to be mission-critical for the achievement of national policy goals.
11. These figures are at odds with those used in the Planning Statement Figure 2.2, which gives only 4.4GW 'committed or under construction'. That is not reconcilable with 7.2 GW being consented in Scotland alone. (It is exceptionally rare for a consented wind farm not to be built.) Figure 2.2 also excludes the large amount of capacity in planning, with a very high consenting rate for applications in Scotland. Using accurate numbers and assuming the proportion of applications consented continues to be as high as in recent years, the apparent gap between the current operational capacity and the 2030 'Clean Power Capacity Range' evaporates. Table 2.3 in the Planning Statement gives numbers for Scottish onshore wind inconsistent with those in Figure 2.2 (and much more consistent with those accessed by Mountaineering Scotland) but this goes unremarked in the Planning Statement. Mountaineering Scotland would argue that the problem (quite evident from Table 2.3) is not insufficient generation capacity being consented but the inability of industry to build and connect consented capacity at the pace required to achieve policy goals.
12. The developer promises ecological and other enhancements as a consequence of consent being granted. These are mandatory or expected requirements for all development under NPF4. Even if the proposed enhancements are commendable, compliance with what is expected in NPF4 should simply be a matter of course, giving no extra weight to the development side of the planning balance.
13. There is no requirement in policy, nor is it necessary for addressing the climate emergency at pace, to consent development proposals that are not acceptable in planning terms.<sup>3</sup> Mountaineering Scotland

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<sup>3</sup> The applicant's stated intention/expectation is to begin construction of Blair Hill, if consented, in 2029 with a 24-month construction period (EIAR para 2.5.1). The first electricity would thus reach the grid in 2031. Blair Hill could not contribute to attaining the 2030 UK or Scottish targets despite the misleading implication that it could in the Planning Statement (e.g. paras 4.3.9 and 6.2.6). (The *Economic and Community Impact Report* Figure 6-1 might imply a slightly earlier date but the timing axis, labelled 'approximate', seems to be merely illustrative.)

submits that the location of the proposed Blair Hill development is not acceptable in planning terms and therefore consent should be refused.

#### **4 Landscape and Visual Impact**

##### **a) Preamble**

14. 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. This application is no exception. 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.
15. Mountaineering Scotland regards it as utterly unacceptable for a planning application not to provide full 90° baseline photography, 90° cumulative wirelines, and photomontages for all viewpoints close to a proposed development. The provision of a single 53.5° wireline showing only the proposed development for each of the two closest hill viewpoints (VP 21 Lamachan Hill, VP22 Millfore) and for Meikle Millyea (VP23) is claimed to be because "*It is not considered proportionate to climb all of the hills requested in the vicinity of the Site to obtain photography, given that many of these summits would take around a day to climb in good conditions.*" (Technical Appendix 6.2 p.6; see also p.10 and p.29).<sup>4</sup> This is thoroughly disrespectful not only to the hillwalking community, whom these viewpoints represent, but also to the planning process and the decision-maker. It fails to provide the decision-maker with the full – and in this case essential – information required for a sound judgement on the visual impact of the proposed scheme.

##### **b) Assessment**

16. The Galloway Hills are a mountain landscape of high value. These uplands not only have an intrinsic attractiveness to hillwalkers but also have some rarity value as the highest, most extensive, wildest (despite extensive forestry plantations) and least affected by wind farms in southwestern Scotland, with a ruggedness not found at the same scale anywhere else in southern Scotland. The proposed development site itself is not of substantial direct mountaineering interest, though one route to Lamachan Hill, going from Auchinleck via Larg Hill, would be crossed by the approach road, with a negligible impact. The main impact is upon views across the site from the hills immediately to the north (the Minnigaff Hills) then clockwise to Cairnmore of Fleet to the southeast at distances up to 15km.
17. The upland areas impacted are within both the Galloway Hills Regional Scenic Area (as is the proposed development site) and the Galloway Forest Park. Several fringe or closely overlook the Merrick Wild Land

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<sup>4</sup> It is of note that Dumfries and Galloway Council consistently asked for photomontages of such viewpoints and the applicant responses indicated that they would be provided in the EIAR (EIAR Table 6.1 *passim*).

Area. These labelled geographies are official recognition of the high scenic value of the upland and lower wild landscapes around the proposed site. It is accepted that there is only very limited fragmented visibility of Blair Hill from the WLA, consisting of a small number of blade-tips except at Shalloch-on-Minnoch/Shalloch where two hubs would be visible. It would have been better if the design had reduced this visibility, perhaps by removing or reducing the height of the highest altitude turbines, but this would not have made the scheme as a whole acceptable. (For the avoidance of doubt, Mountaineering Scotland's assessment is restricted to the visual amenity experienced in and from mountain landscapes and consequential impacts upon the quality of mountaineering experience and does not extend to assessing impacts on the qualities of designated or otherwise defined areas in themselves.)

18. Blair Hill would sit high in the landscape. The highest altitude turbine base would be c.400m OD so 250m turbine blade-tips would reach c.650m OD with hubs at c.565m OD. The blade tips would be only a little below the summits of the Minnigaff Hills. The four Donalds (hills in the Southern Uplands >2000 feet listed by the Scottish Mountaineering Club) in the Minnigaff Hills have summits at 656, 658, 674 and 716m (cf VPs 21 & 22).
19. Within the arc of hills affected, from the slopes of Larg Hill through Meikle Millyea and Benninguinea to Cairnmore of Fleet, at distances of <1.5km to 14km, there would be a substantial visual impact. The LVIA, as is now typical, claims that significant visual effects are only local – out to 5.4km being the favoured distance in this application. Mountaineering Scotland profoundly disagrees with this assertion. LVIA's, as here, often overstate the extent to which impact diminishes with distance; a bias that has become more pronounced following NPF4's stating that 'localised' impacts were acceptable (Policy 11.e.ii). The LVIA also claims that visibility of existing turbines would diminish the impact of Blair Hill. Again, Mountaineering Scotland disagrees. Distant views (distances are given in the table below), especially when turbines have amassed into a homogenous wind farm landscape, have no or very little moderating effect upon the impact from a much closer wind farm in direct view.
20. It should also be recognised that turbines are much larger than in most existing constructed projects and, in the experience of Mountaineering Scotland, more overtly visible at greater distances than previously. They catch the eye especially when they are the only turbines close enough to be clearly seen, with movement, in a particular direction of view, as would be the case here. In fairness, it must be acknowledged that consented schemes for very large turbines to the west and northeast of the viewpoints assessed below may make some turbines and movement more obvious at distance than currently, but this would not change the general pattern of wind energy being seen as a notable and extensive but distant feature of views from the Galloway Hills.

21. The table below assesses the LVIA Viewpoints relevant to mountaineering interests.

Viewpoint (distance to nearest turbine): clockwise from N to SE		ElAR daylight assessment	Mountaineering Scotland assessment
7	The Merrick (11km)	Minimal,	Although TA 6,4 para 7.4.1 refers to visibility of three blade-tips, the wireline shows only two. In either

		not significant	case it is <b>agreed</b> that the effect would be very minor, though not unnoticeable. (And slightly less minor though more distant from Shalloch/Shalloch-on-Minnoch.)
21	Lamachan Hill (2.9km)	Major-moderate, significant	The effect is <b>Major</b> , there is nothing moderate about it. 14 towers are visible at close range. There are no wind farms in view to the south (i.e. in the direction of view over Blair Hill). To the west the nearest wind farm (excluding the application Glenvernoch) is c.18km distant, fronting the extensive Wigtownshire Moors wind farm landscape. An indication of this wider context can be seen in the wireline submitted (with a regrettably hazy baseline photograph) for Lamachan Hill as VP 13 in the Glenvernoch Wind Farm application (ECU00004892). Glenvernoch's VP is about 200m N of the Blair Hill VP. Any walker approaching and summing the hill would experience rapid sequential, almost full, visibility of the two developments.
23	Meikle Millyea (12km) (This is given as VP22 in para 6.6.11 where Corserine, not used a viewpoint, is given as VP23.)	Moderate, not significant	The impact is <b>Major-moderate</b> and <b>significant</b> . Although distance does slightly moderate the impact, it does not counteract the intrusion of turbines (7 with full hubs and parts of towers, 4 with the hubs just visible, 1 blade and 1 blade-tip) in a direction of view with no other wind farms overtly visible. The nearest wind farm visible to the west is c.27km distant. However, the nearest to the east is c.15km distant, fronting the emerging northwest Glenkens local wind farm landscape. (This excepts the unbuilt long-consented two Torrs Hill turbines at c.7km.) The Glenkens is in the opposite direction to Blair Hill meaning Meikle Millyea and other Rhinns of Kells peaks with visibility would, if Blair Hill is consented, feel sandwiched between wind farms at similar distances to SW and NE.
22	Millfore (5.4km)	Major-moderate, significant	As with VP21, there is nothing moderate about the impact at this viewpoint: it is <b>Major</b> . At close range all 14 towers would be visible with the next nearest wind farms (excluding the application Glenvernoch) dimly visible beyond at c.22km from the VP. An impression of this wider context can be gained from the wireline submitted (with a regrettably hazy baseline photograph) for Garlick Hill as VP 14 in the Glenvernoch Wind Farm application (ECU00004892).
11	Benninguinea (14km)	Slight, not significant	The impact is <b>Major-moderate</b> and <b>significant</b> . Although distance does slightly moderate the impact, it does not counteract the intrusion of turbines (9 with full hubs and parts of towers, 3 with the blade visible and 1 with blade-tip) in a direction of view where other wind farms are low on the horizon and at distances upwards of 30km. To the east and northeast, however, the nearest turbines are c.13km distant, with nearly 90° of the horizon occupied by wind farms (operational/consented) of



			the northwest Glenkens and southeast Ayrshire wind farm landscape. This is in the opposite direction of view to Blair Hill, meaning the VP would, if Blair Hill is consented, feel sandwiched between wind farms at similar distances in opposite directions.
6	Cairnsmore of Fleet (8.6km)	Moderate, not significant	The impact is <b>Major</b> and <b>significant</b> . As with most other upland VPs assessed here, Blair Hill would appear in full view, prominent and close, a perception exacerbated by the recessive and rather uniform appearance of the much more distant Wigtownshire Moors wind farm landscape beyond (excluding the application Glenvernoch). However, note the realistically photographed visibility of Kilgallioch's 146m BTH turbines at 25km, nearly three times the distance, compared with the faded appearance of Blair Hill's 200m BTH turbines on the photomontage. In good visibility (the preferred conditions for hillwalking, if not always achieved) turbines at such close range are much more visible than is suggested here. Again, as with most other assessed upland VPs, the northwest Glenkens and southeast Ayrshire wind farm landscape is in view in a different direction (NNE) to Blair Hill (NW) and the distant Wigtownshire Moors wind farm landscape.

22. In summary, the solus impact of the proposed Blair Hill wind farm would be significantly adverse at all these viewpoints when assessed from the perspective of mountaineering activity.
23. The only application wind farm of relevance for Mountaineering Scotland's assessment is Glenvernoch (13 turbines of 200m BTH). Blair Hill and Glenvernoch in combination, if both were consented, would have severe impacts on the quality of visual experience in the Galloway Hills. Glenvernoch would impact the western (Merrick) range and wild interior screened from Blair Hill. Both would impact the western Minnigaff Hills, Cairnsmore of Fleet and the highest part of the Rhinns of Kells. Blair Hill would impact the eastern Minnigaff Hills and more of the Rhinns of Kells (especially south) shielded from Glenvernoch (*cf* Figure 6.32 in the Glenvernoch Wind Farm application (ECU00004892) which is much clearer than the confusing Blair Hill Figure 6.11). Either wind farm alone would be extremely harmful to the quality of the Galloway Hills; in combination they would be utterly devastating.
24. Hillwalkers on the Galloway Hills currently have a perceived sense of remoteness from human artefacts rare in southern Scotland. This is a direct consequence of the absence of wind farm development in close proximity to much of the range. Placing tall turbines much further forward towards the hills, into the undeveloped fringe, would be a marked disruption of the pattern of development thus far found to be mostly acceptable. (Mountaineering Scotland has concerns about the spread of development onto the south and southwest flanks of Cairnsmore of Carsphairn but that is not relevant here.) Blair Hill (and Glenvernoch) would not blend in with the existing pattern but instead would bring the influence of

turbines into new territory at close range, redefining the perceived character of part of the upland fringe and reducing the sense of spaciousness that currently obtains in the absence of features giving a scale (cf VP 4 Glenvernoch Fell).

25. Visual impacts have consequences. Mountaineers have multiple motivations, both individually and collectively. Very few go into the hills only to tick a list or achieve some challenge. However, even a cursory glance at hillwalking magazines or chat on the hill shows that quality of visual experience (the view, the scenery) is highly important. So too are feelings invoked by the physical experience of remoteness, wildness, and engaging with hard terrain such as the Galloway hills can provide. 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 success of the annual Newton Stewart Walkfest exemplifies the attraction of the rugged Galloway Hills to walking visitors every May. The event organisers state on their website (<https://www.walkfestnewtonstewart.com/>) that over the last 22 years they have organised, for a week every May, more than 450 guided walks, with currently around 240 individual walkers participating in the week's walking. This year adds a further 31 walking routes for public enjoyment.
27. None of this is understood by those who feel able to pronounce on the potential impact of developments on mountaineering without understanding the motivations of mountaineers either in general or with regard to a specific route or area. The dismissal of impact upon hillwalking in the Economic and Community Impact Report appears to be desk-based supposition from looking at service-provider websites and intended to give an air of credence to a pre-formed conclusion. The brief and not wholly accurate consideration of the LVIA in the Report (p.44) also appears uninformed by a proper awareness of the local landscape. As the national membership organisation for mountaineering in Scotland, Mountaineering Scotland might be considered to have a better sense of what motivates and disincentivises mountaineers through its daily contact with a wide range of mountain-goers. It might be noted that its assessors for this planning application have very substantial experience on the ground of the Galloway hills.
28. The evidence from surveys of mountaineers suggests that some activity is displaced from areas with wind farms to areas without. Mountaineering Scotland undertook a survey of its members' opinion in 2016 and repeated the same question in 2023 asking if behaviour had changed in response to the spread of 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 go to another area to avoid wind farms and 42% would still go to an area with a wind farm but their enjoyment would be diminished (perhaps leading to less frequent or fewer repeat visits?). In contrast, only 2% would go to such an area more often. It would have no impact on 35%. Hillwalkers go to an area to climb hills, though that may not be all they do while there. They do not travel to substitute, say, woodland trails for hill-climbing. A proportion will substitute other areas, going to hills in Cumbria or the West Highlands for example, where wind farms are not part of the experience. There is a scarcity value now attached to the Galloway Hills as the only sizeable upland in



southwest Scotland without the close presence of wind farms. That could be capitalised upon to attract more hillwalkers, whereas closer visibility of wind farms would introduce a disincentive to visiting not currently present.

### c) Conclusion

29. This assessment shows that the proposed Blair Hill wind farm would have a significant adverse visual impact upon the Galloway Hills. It would break the established and, for Mountaineering Scotland, generally acceptable pattern of development that has thus far buffered the high-quality mountaineering experience in Galloway from intrusive and detrimental development.

### Conclusion

30. The proposed development is contrary to national policy (NPF4) and to the Local Development Plan. Its siting does not 'preserve natural beauty'. It would have a significantly adverse impact upon visual amenity and the overall experience of those visiting the Galloway uplands – specifically the Minnigaff Hills, Cairnmore of Fleet and southern Rhinns of Kells range – substantially diminishing the distinctive landscape and ambience they offer that is found nowhere else in the south of Scotland.
31. Mountaineering Scotland **objects** to the proposed Blair Hill wind farm.

Yours sincerely



**Stuart Younie**

**CEO, Mountaineering Scotland**

