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19 December 2024

Dear Sir/Madam

**Glenvernoch WIND FARM PROPOSAL**

**ECU reference: ECU00004892**

**Introduction**

1. Energiekontor has submitted an application for a wind farm at Glenvernoch of 13 turbines of 200m BTH [86MW capacity] to the southwest of Glen Trool, north of Newton Stewart.

Mountaineering Scotland **objects** to the proposed wind farm development on grounds of visual impact on the regionally, and arguably nationally, significant and popular Merrick range, the interior wild landscape lying east of the Merrick range, and other Galloway hills to its south

**Mountaineering Scotland**

2. Mountaineering Scotland is a membership organisation with more than 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.

## Policy

3. 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 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 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.

4. It is Mountaineering Scotland's view that the location of the proposed Glenvernoch development is not the right place. The refusal of Hill of Ochiltree, adjacent to the present proposed site, in 2012 supports this view, albeit that took place under a much more balanced national planning policy. The refusal of Clauchrie, 10.5km west of The Merrick, in 2023 is more directly pertinent since it took place under *NPF4*. Given its relevance it is worth quoting Scottish Ministers' conclusion at some length.

"The Scottish Ministers ... agree with the Reporter's findings, reasoning and conclusion in respect of the detrimental visual impacts of the proposed Development on The Merrick, a very important visual receptor in South-West Scotland, which go beyond being experienced locally and which cannot be mitigated. The proposed Development would also fail to preserve natural beauty, which is one of the matters Scottish Ministers are required to have regard to the desirability of by virtue of Schedule 9 of the Electricity Act. Although Scottish Ministers consider that the detrimental local landscape effects, impacts on the qualities of a number of environmental designations and locally significant effects on users of the Barr Trails would be acceptable in the context of the net economic benefits and the significant renewable energy benefits [100MW capacity] that would be delivered if the proposed Development were to be deployed, the significant visual impacts on The Merrick, would not. Even taking into account the significant support assigned by *NPF4* to the proposed Development and its status as national development, this ultimately leads the Scottish Ministers to the conclusion that despite the many factors in favour of the proposed Development, this is not the right development in the right place and the proposed Development is therefore not acceptable overall."

(Clauchrie Decision Letter 31 August 2023, pp19-20)

5. There is nothing in current national policy that seeks to promote development in inappropriate locations and other proposed wind developments have also been refused consent

under NPF4. It is Mountaineering Scotland's contention that Glenvernoch is the wrong place for a wind farm, as set out below in its assessment of visual impact and the consequences thereof for the mountaineering experience. Glenvernoch fails to meet NPF4 Policy 11.e.ii, with some overlap across to Policy 11.e.iii.

6. It also fails as an appropriate location against Dumfries and Galloway's local policy insofar as this is guided 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*. Although the host landscape of Plateau moorland with forest (LCT 17a) was identified in these documents as generally suitable for large turbines, that was heavily qualified with particular reference to the Glenvernoch Fell area.

7. The adopted 2020 version refers to "Areas of open moorland and pockets of settled farmland, small but pronounced hills ... for example Glenvernoch Fell" (para 20.2.2) as a key constraint to the deployment of larger (>150m) turbines. It also refers to "The shapely open Glenvernoch Fell [as] more prominent despite its relatively low height" than larger hills under "extensive forest cover ... [that] ... tends to 'flatten' and mask underlying topography". (p.225)

8. The 2024 Consultation Draft makes similar reference to Glenvernoch Fell under Key Constraints (para 16.2.2) but under that heading also adds reference to "... views to the Galloway Hills from vantage points such as Glenvernoch Fell" and states bluntly that "All development typologies should avoid impacting on the setting and views to small lochs, on areas of more complex landform, including small but pronounced hills such as Glenvernoch Fell". (para 16.3)

9. As an open area with evident, if modest, topography within an LCT largely blanketed by commercial conifer forestry, Glenvernoch has a landscape value that sets it apart from - and gives it a higher value than - the majority of the Plateau moorland with forestry (LCT 17a). There are only two large areas of moorland within the confusingly named 'Plateau moorland with forestry', one of which is already bordered and overlooked by turbines and has turbines consented within it. The other - as yet without turbines (operational or consented) beside or within it – is that centred on Hill of Ochiltree/Glenvernoch Fell.

10. As the assessment below shows, the the proposed development is clearly at odds with the findings of the *Landscape Sensitivity Study* and hence contravenes the Local Development Plan, which is a material consideration in determining an S.36 application.

11. Turning to other matters, the proposed 10MW battery should carry little weight since it appears to be little more than a box-ticking exercise. Almost all applications post-NPF4 promise

batteries, usually larger than proposed here, and storage at grid scale (e.g. Coalburn, 500MW, consented June 2023) is much more meaningful in terms of maintaining power supply and grid stability. Similarly, ecological enhancement is a mandatory requirement for all development under NPF4, so all wind farm proposals now tick that box and such compliance should simply be expected rather than carry weight.

12. While the environmental effects of the proposed development may not be unusual for a commercial scale onshore wind farm, that does not mean they are acceptable in this specific location. There are many alternative locations. Indeed, there is (in round numbers) 7,200MW of onshore wind capacity currently consented and awaiting construction (with only 1,900MW of that under construction) and 7,500MW within the planning system (Scottish Energy Statistics Hub, accessed 17 December 2024). There are very many further schemes at scoping/pre-application. A single modest scheme such as Glenvernoch (85MW) is not mission-critical for the achievement of national policy goals.

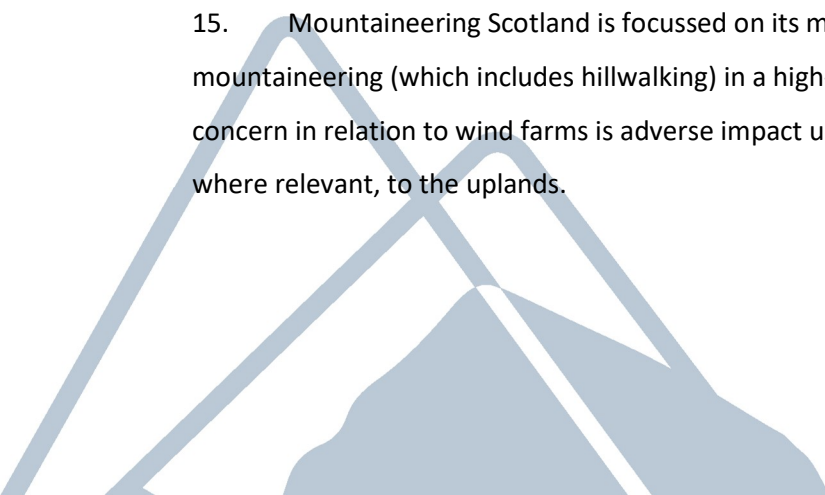
13. There is no requirement in policy, nor is it necessary for addressing the climate emergency, to consent development proposals that are not acceptable in planning terms. Mountaineering Scotland submits that the proposed Glenvernoch development is not acceptable in planning terms and therefore consent should be refused.

## **Landscape and Visual Impact**

### **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 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, including views from and, where relevant, to the uplands.



## Assessment

16. The proposed development site is not of direct mountaineering interest, though the Southern Upland Way does pass close by. Views at close range would be dominated by turbines. The extensive plantation forestry in the wider area would often conceal the development from locations further out. Mountaineering Scotland's substantive interest is in the middle-distance views (typically at 10-15km) of Glenvernoch from elevated locations. These stretch from the north of Glenvernoch clockwise through to southeast. This area is within the Galloway Hills Regional Scenic Area and mostly within the Galloway Forest Park. Significant parts are also in the Merrick Wild Land Area. These labelled geographies are official recognition of the high scenic value of these upland landscapes. (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.)

17. It is regrettable that none of the additional viewpoints proposed by Mountaineering Scotland in its response to the Scoping Report were taken up. The section of the EIAR providing a response to Scoping Report comments does not address the specifics of the viewpoints proposed or why they were rejected (Table 6.1). The limited upland viewpoints make it difficult to form an overall assessment of the impact of Glenvernoch, particularly on Cairnsmore of Fleet (c.14km to the SE with an open view to the whole site), the interior of the wild area (c.11-15km distant with Glenvernoch gunsighted down Glen Trool), and the Rhinns of Kells (somewhat distant (c.20km) but with Glenvernoch again gunsighted down Glen Trool).

18. It is also regrettable that the baseline photography for the photomontages was taken in poor atmospheric conditions. These images should be sharp to represent the 'worst-case' scenario, and they most certainly do not, their haziness giving a misleading impression of just how visible and prominent turbines of the size proposed actually are in clear conditions.

19. The LVIA describes the site: "The topography of the Site is characterised as an extensive upland plateau flanked by hillslopes and extensive forest plantation; forming a notable topographical feature experienced in many views from the surrounding lower-lying landscape" (para 6.91). That is a reasonable description except for the fact that the turbine zone is not upland, extensive or a plateau. It is a modestly sized low-level, knolly shelf.

20. The *Dumfries and Galloway Wind Energy Landscape Sensitivity Study* both as adopted and the 2024 Consultation Draft were referred to above, where specific mentions were cited of Glenvernoch Fell and its unsuitability for large turbines. The impact of the proposed wind farm upon

Glenvernoch Fell would be very substantial. Glenvernoch Fell is 184m OD high. The nearest turbine, at c.700m distance, would have a hub altitude of c.215m OD and a blade-tip altitude of c.300m OD (based on hub height of 115m and blade-tip height of 200m). Three other turbines would be a similar altitude OD and the other nine would have hubs at 165-210m OD and blade-tips at 250-295m OD. The blades of all turbines would substantially over-top Glenvernoch Fell/Hill of Ochiltree and almost all hubs would over-top the summit of this small but distinctive hill (cf Viewpoint 1).

21. There are only two unforested summits on the Southern Upland Way between Glenluce and Glen Trool. Craig Arie is within Kilgallioch wind farm and plantation forestry. Hill of Ochiltree is without forestry or turbines but if Glenvernoch is consented that would be lost. (For completeness it is noted that there is also a lesser rise at Knockniehourie which, as VP8 shows, is beset by operational and consented turbines.)

22. The substantive mountaineering interest lies in the arc of hills from the Merrick range, through Lamachan and Larg Hills, to Cairnsmore of Fleet. The Merrick itself is Viewpoint 12, though the most common route to/from it has a clear view from around 2km further south, closer to Glenvernoch. Lamachan Hill is Viewpoint 13; the adjacent Donald (hills in the Southern Uplands over 2000 feet as listed by the Scottish Mountaineering Club) of Larg Hill is around 1km nearer with a clear view. As noted above, the selected viewpoints omit Cairnsmore of Fleet where there is full visibility from the upper part of the customary route. There is also mountaineering interest in the wild and rugged interior lying between the Merrick range and the Dungeon (Hill) range and including the latter. This is the most secluded area of its size in southern Scotland. It is also unrepresented in the selected Viewpoints: Bruce's Stone (VP 9) is on the same alignment but at a low altitude (117m); for example, compared with Buchan Hill just 2km more distant with an unobstructed view to the site from c.480m OD, or Craginaw, the highest hill in the Dungeon range at 645m OD, 15km from Glenvernoch.

23. Within this arc of hills and the wild interior, at distances of c.8-15km, there would be a substantial visual impact. The LVIA, as is now typical, claims that significant visual effects are only local – 6km being the repeatedly favoured distance in this application. Mountaineering Scotland profoundly disagrees with this assertion. LVIAs, as here, often overstate the extent to which impact diminishes with distance and that has become more pronounced following NPF4's stating that 'localised' impacts were acceptable (Policy 11.e.ii). Yet turbines are much larger than previously and, in the experience of Mountaineering Scotland, more overtly visible at greater distances than previously. (The data in Table 6.10 shows the increase in turbine height, from an average of 101m for those currently operational to 162m for those consented to 184m for those in planning, including Glenvernoch.)

24. The table below assesses those Viewpoints relevant to Mountaineering Scotland's interests.

Viewpoint (distance to nearest turbine)		EIAR assessment (daylight)	Mountaineering Scotland assessment
1	Hill of Ochiltree, Southern Upland Way (1.2 km)	Major, significant	Agreed. The impact is undeniably obvious. As the photomontage shows, the view to Cairnsmore of Fleet would be particularly damaged, though Merrick and Lamachan views would be unaffected as the walker proceeds northwards on the SUW while listening to the woomph of the turbine rotors.
4	Bargrennan, Southern Upland Way (2.5 km)	Major, significant	Agreed. The LVIA overstates the mitigation from topographic and vegetation screening.
5	Eldrig Fell (9.9 km)	Moderate, non-significant	Moderate, <b>significant</b> . The context is important here: the consented Kilgallioch Extension would be just off left of the baseline picture, so the viewer would have the view of Glenvernoch's turbines fronting the Lamachan hills framed by proximate turbines to left and right. Albeit this is not a well trafficked location.
9	Bruce's Stone, Glen Trool (9.3 km)	Moderate, non-significant	<b>Major, significant</b> . This location shows the difficulty of using single viewpoint locations since the views change notably depending on location (not least altitude) and also whether the extensive young roadside birches are in leaf or not. On balance the size of the turbines and their proximity relative to and contrasting with the distant massed turbines to the west makes for a significant visual impact. (To compare scale and distance note Airies wind farm visible on the skyline in the baseline photograph with 131.5m BTH turbines at 17.3km distance.)



12	Merrick (14.1 km)	Moderate, non-significant	<b>Major, significant.</b> Glenvernoch presents as a significant intrusion into a turbine-free area. There is an extensive background of turbines but at a greater distance (8km+ beyond Glenvernoch)* and except for Kilgallioch Extension the largest turbines are at least 12km beyond Glenvernoch. Pale turbines seen from above against a darker vegetation, contrary to the LVIA, <i>would</i> appear 'overtly prominent'.
13	Lamachan Hill (9.1 km)	Moderate, significant	<b>Major, significant.</b> Comments as for The Merrick.
14	Garlick Hill (7.1 km)	Moderate, significant	<b>Major, significant.</b> Comments as for The Merrick.

\* From The Merrick a direct line to the nearest turbines (Kilgallioch at 145m BTH) cuts the corner such that the total distance is c.20km to the nearest turbine. For other wind farms seen from The Merrick and for other viewpoints the nearest turbines, including Kilgallioch Extension, are viewed over Glenvernoch and the distances in the table apply.

25. The Galloway hills, including the 'interior' as referred to previously, are a mountain landscape of high value. The Merrick range forms a superb upland ridge – almost entirely above 600m for c.10km – along the western edge of the mountain core of Galloway, a rugged area more akin to the Highlands than to the rest of the Southern Uplands. The Merrick itself is the highest point in Southern Scotland and a popular place for hill-walking. The views from the ridge give a remarkable sense of elevation and space in all directions.

26. Mountaineering Scotland agrees with the LVIA that: "Collectively, the operational and proposed developments would serve to result in wind energy being seen as a notable feature in many views in the landscape of the wider study area to the west of the Site." (Para 6.436). But it does not agree that: "The addition of the Proposed Development would serve to reinforce this pattern, particularly in combination with the proposed Blair Hill development, *albeit extending the significant visual and character effects into a separate area further to the east within the landscape.*" (*ibid*, added emphasis). What is presented by the applicant as a throw-away qualification, and which Mountaineering Scotland has italicised to emphasise, is in fact the key issue. Glenvernoch would extend significant effects into a separate area presently quite distinct in character from the



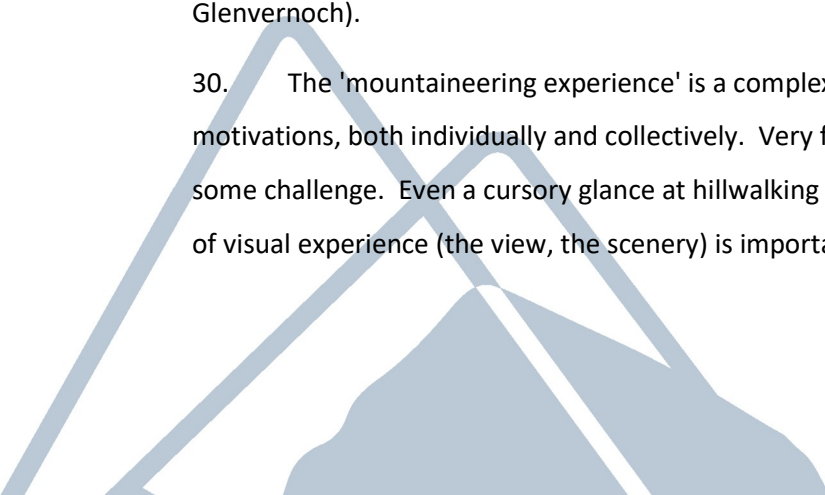
operational and consented wind farm landscape to its west. (Note that Blair Hill is not yet in planning and once an application is lodged a favourable decision cannot be presumed, so it cannot be called upon to downplay the solus impact of Glenvernoch.)

27. Viewed purely from a mountaineering perspective, the regional pattern of wind farm development west and southwest of the Merrick has proved to be acceptable. (It is of note that Mountaineering Scotland raised no objection to any of the many wind farms listed in Table 6.10.) A wind farm landscape is coming into being but at distances mostly exceeding 15km from the main range, separated from it by a broad, visually recessive, margin of plantation forestry with occasional open areas of moorland. There is a simple, coherent sequence of landscape transitions outwards from the range - from open hill to forestry (with moorland) to wind farms. This gives those on the range and in the interior a perceived sense of remoteness from human artefacts rare in southern Scotland.

28. Placing tall turbines into this undeveloped fringe, thrusting much further forward towards the hills, would disrupt the pattern of development thus far found to be acceptable. It would not blend in with the existing pattern but would bring the influence of turbines into new territory, redefining the perceived character of that part of the fringe and reducing the sense of spaciousness that currently obtains in the absence of features giving a scale.

29. The mountaineering experience in Scotland is closely connected with the wild land character of the landscapes in which most mountains are located. The premier wild area in Galloway – indeed, in southern Scotland – is that from the Merrick range to the Dungeon range, inclusive. It is not unblemished. Nowhere in Scotland is. Past and present land management is evident to those who understand the landscape. But it offers a great deal more authentic wildness than anywhere else in Scotland south of the Highlands, both in areal extent and in intensity of experience. Intermittent northward views of Dersalloch wind farm's 125m turbines (c.12km distant) now detract from the experience. Glenvernoch would add sight of 200m turbines at a similar distance to the southwest. This is not covered at all in the LVIA which does not even mention Dersalloch wind farm despite the obvious potential for cumulative visual impact on the interior from two directions (cf LVIA para 6.409 where this is recognised in theory without the realisation that it applies in practice for Glenvernoch).

30. The 'mountaineering experience' is a complex phenomenon. Mountaineers have multiple motivations, both individually and collectively. Very few go into the hills only to tick a list or achieve some challenge. 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 feelings invoked by the physical



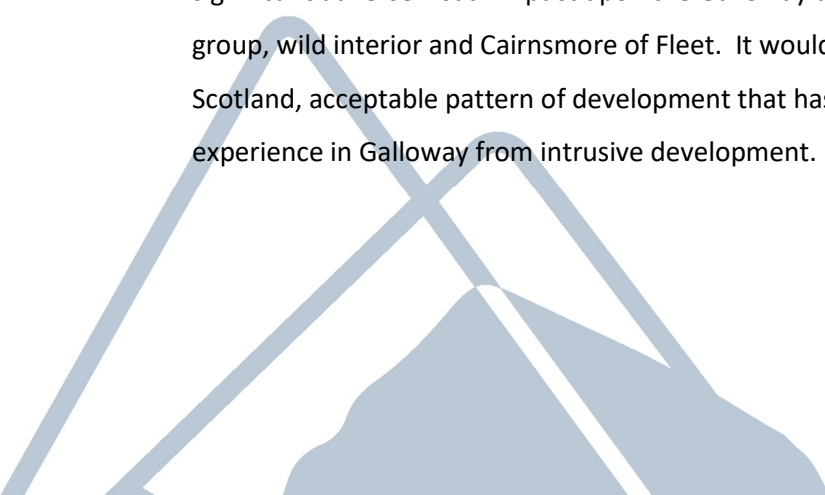
experience of remoteness, wildness, and engaging with hard terrain - and the interior of the Galloway hills is hard terrain. The experience is enhanced by engagement with nature both visually and aurally. The sound of the wind in the hills, for example, is quite different from in the city. The resultant benefits to physical and mental health are increasingly recognised and promoted.

31. None of this is understood by those who feel able to pronounce on the potential impact of developments on mountaineering without being able to present or cite any meaningful empirical evidence on the motivations of mountaineers (or any other countryside users) either in general or with regard to a specific route or area. The brief dismissal of impact upon the Forest Park and upon hill routes in *Appendix 14.1 Tourism Impact Assessment* consists of desk-based supposition from looking at service-provider websites which has all the appearance of having been designed to give an air of credence to a pre-formed conclusion. 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.

32. 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 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. (For completeness: it would have no impact on 35%.) These surveys did not ask about motivations directly, but the behavioural responses recorded suggest that they include a strong visual element.

## **Conclusion**

33. The above assessment shows that the proposed Glenvernoch wind farm would have a significant adverse visual impact upon the Galloway uplands, including The Merrick, Lamachan group, wild interior and Cairnsmore of Fleet. It would break the established and, for Mountaineering Scotland, acceptable pattern of development that has buffered the high-quality mountaineering experience in Galloway from intrusive development.



34. 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 which, especially on the Merrick range and within the wild interior, have a distinctive landscape and ambience akin to the Highlands and not found elsewhere in the south of Scotland.

35. Mountaineering Scotland **objects** to the proposed Glenvernoch wind farm.

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**

