

By email to: Econsents_admin@gov.scot

Energy Consents Unit
Directorate for Energy and Climate Change
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2 May 2022

Dear Sir/Madam

Grayside Wind Farm - S36 application for 21 turbines above the Cowgill and Culter valleys, south of Biggar, immediately north of, and abutting, the Clyde Wind Farms.

ECU reference: ECU00003446

Background and Context

1. Grayside WF Ltd. has submitted an application for a wind farm of 21 turbines of 200m blade-tip height above the Cowgill and Culter valleys, south of Biggar. The turbines, in separate east and west arrays, would sit immediately north of, and abutting, the Clyde (including Extension) Wind Farm.
2. Mountaineering Scotland **objects** to the proposed development on grounds of visual impact.

Mountaineering Scotland

3. Mountaineering Scotland is a membership organisation with more than 15,000 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.
4. Mountaineering Scotland supports the move to a low carbon economy but does not believe that this need be at the expense of Scotland's marvellous mountain landscapes. It objects only to the small proportion of proposals that are potentially highly damaging to Scotland's valuable mountain assets, consistent with its policy set out in Respecting Scotland's Mountains. This approach 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

a) Introduction

5. For simplicity we refer simply to Clyde Wind Farms to include both the original and extension Clyde wind farms without distinguishing between them.

b) Policy

6. Scottish planning and energy policies are in a state of change. The extant policies will have been superseded by NPF4 and a new Scottish Energy Strategy (SES) by the time a decision is made on this application. But NPF4 is currently only in consultation draft and the SES not even at that stage. Grayside, therefore, cannot sensibly be assessed against either current or future policy other than at a very general level.

7. The Scottish Government enthusiastically supports continued onshore wind deployment and we expect that to continue. However, policy (extant and in draft) is clear that expected economic and emissions benefits are to be balanced against potential harms in the determination of an individual planning application.

8. Each development needs to be judged on its own merits and in its geographical context. Decision-makers are not bound by national energy and planning policies to consent any particular scheme for electricity generation if its anticipated benefits are outweighed by its anticipated negative consequences. There are many possible locations suitable for low-carbon electricity generation. The adverse consequences of an individual scheme, however, are site-specific and should weigh more heavily in the balance because of this.

c) Landscape and visual impact (including cumulative impact)

9. Landscape and visual impact assessment (LVIA) compiles data and presents results within an objective structure but ultimately applies subjective judgement. In our experience, commissioned assessments consistently downplay the impact of proposed development. Mountaineering Scotland's assessment has been informed by the compilers and reviewers of this objection having extensive experience on Scottish and other hills, and 'fieldwork' in the hills around the development site stretching over many decades. We do not suggest that either professional or consumer judgement trumps the other; simply that each has a distinct place in informed decision-making.

10. As lay consumers of upland landscapes, we find the professional distinction drawn between the various landscape and visual impacts often rather theoretical and the segmentation of landscapes for analysis to weaken the overall perspective. Hillwalkers experience landscape as a total experience, not separated into component parts. That is how we approach our assessment and we would hope that the decision-maker would take a similar holistic approach.

11. The development site and its management are typical of the rounded hills and ridges of the area. The site is set adjacent to an extensive wind farm landscape which is already the dominant visual influence upon a wide area to the west and south. Further applications and pre-planning proposals within this broader area will doubtless increase and intensify the wind farm landscape¹. Grayside itself would appear from many angles as an extension of the extensive Clyde Wind Farms.

¹ Table 6.5 lists turbines <20km from Grayside: 291 operational, 13 under construction, 89 consented, 17 application, 126+ scoping.

12. Despite this context, there are three areas of concern to mountaineering interests. They all relate to visual impact. The quality of the landscapes in which the affected hills sit is often recognised by designation as Special Landscape Areas.

13. First, from Culter Fell the eastern array turbines would appear dominant. The size and proximity (2.8km) of the turbines overshadow this, the highest local hill. The blade tips of four of the six turbines and the hub² of one (T21) would be seen above the viewer, even though the viewer is on the highest natural ground for more than 10km in any direction. The whole experience of being on top of a hill would be substantially diminished by still being lower than the turbines. The same is not the case for the western array which is set lower than Culter Fell and about 1km further away. No hub would reach the height of Culter Fell and only three blade-tips would barely reach its height, creating a much less intimidating feel to the array compared with the eastern array. The LVIA rates the impact on Culter Fell as significant.

14. Second, from Tinto Grayside would increase and bring closer turbines in the southeast quadrant of the view. The nearest turbines are only slightly closer than those of Clyde but the effect is exacerbated by the larger Grayside turbines. It does not help that Clyde will be flanked further west by Priestgill Variation turbines consented for 180-200m BTH. The scale of Grayside's (and Priestgills') turbines would lead to a perception of a greater advance of turbines towards Tinto than would physically be the case in terms of distance on the ground. The impact is exacerbated by the hubs of turbines 21, 11 and 12 breaking the skyline and turbines 11 and 12 also overlapping, all of which attracts the viewer's attention rather than allowing the Grayside turbines to blend seamlessly with the Clyde turbines that provide a backcloth for much of the Grayside development. The LVIA rates the impact on Tinto as significant.

15. Third, from the east (e.g. Broad Law, Pykestone Hill, Hart Fell to a lesser extent) Turbine 21 repeatedly appears excessively prominent. This is not surprising given that its base altitude is markedly higher than any other turbine in the proposed development. Even from the south, despite a vast expanse of turbines in the foreground, the siting of T21 near the top of Gathersnow Hill makes it stand out and attract the eye from Hod's Hill or Queensberry. From the north, also, the eastern array stands out, and again particularly T21 (e.g. Trahenna Hill, Black Mount). The LVIA rates the impact on all these hills as not significant. While this assessment may appear reasonable when each individual viewpoint is considered, such an approach fails to bring out the consistent pattern across all these viewpoints of the eastern array's obtrusiveness and Turbine 21's particularly prominent individual appearance.

Conclusion

16. Mountaineering Scotland has carefully assessed the proposed development. It would have a direct adverse visual impact upon hillwalkers on Tinto Hill and Culter Fell, and a somewhat lesser visual impact upon the Tweedsmuir Hills and some other hills to north and south.

17. The adverse impact on Tinto and Culter Fell is a direct effect of the location of the proposed development and cannot be mitigated, though the effect on Culter Fell would be very notably lessened if the eastern array were removed. The impact on the Tweedsmuir Hills, etc. could be considerably mitigated by removing or substantially reducing, to below 150m, the height of Turbine 21.

² A hub height of 125m is assumed, following the assumption made in the LVIA

18. Mountaineering Scotland **objects** to the proposed Grayside 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

