

By email to: Stuart.Ramsay@southlanarkshire.gov.uk

Mr Stuart Ramsay
Planning Officer
Planning and Building Standards
South Lanarkshire Council
Hamilton
South Lanarkshire
ML3 0AA

19 August 2022

Dear Mr Ramsay

Erection of 6 No. wind turbines with a maximum height to tip of 149m and associated infrastructure on land 1km West Of Little Gala Farm, Wiston, Biggar, South Lanarkshire

Planning Reference: P/22/0881

Background and Context

1. BayWa.r.e has submitted an application for a wind farm of 6 turbines of 149.9m blade-tip height around 5km southwest of Tinto, South Lanarkshire.
2. Mountaineering Scotland **objects to the proposed development** on grounds of visual impact on the regionally significant and popular Tinto hill.

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

5. Mountaineering Scotland's objection is on the grounds of visual impact upon the regionally significant and popular landmark hill of Tinto (Viewpoint 1).
6. The development site and its management are typical of the rolling mixed landscape of farming, forestry and moor to be found in this area. The wider area is characterised by wind turbines, as well shown by Table 4.9 and Figure 4.7 of the EIA, which exert a substantial and increasingly dominant visual influence upon a wide area to the southeast and west of the application site. Turbines are also visible more distantly to the north.
7. Development has, thus far, respected the situation of Tinto, with the nearest operational turbines being around 8km distant (Clyde WF) to the SE. In the SW quadrant of the view from Tinto, looking towards Little Gala, the nearest turbines are around 12km distant. Little Gala would more than halve that to 5.1km.
8. Although its turbines would be seen as clearly below Tinto summit and flanked by more distant turbines on both sides, it is our judgement that the proposed development would diminish significantly the quality of the view and hence the experience enjoyed by hillwalkers on Tinto. This would be even more strongly experienced by walkers making a circuit using the western (Lochyloch Hill) ridge of Tinto, where the turbines would not only be closer (to within c.3.5km) but also at a similar altitude to the viewer.
9. As the EIA correctly identifies, "the Proposed Development would introduce wind turbines closer to the viewpoint, thereby affecting the valued large scale panoramic views from this location and introducing large scale elements and movement to the currently undeveloped middle ground of the Plateau Moorlands - Glasgow & Clyde Valley which forms an important context to views from Tinto Hills." (TA Table 4.4.2, Viewpoint 1)
10. The impact on Dungavel Hill (Viewpoint 16) is described similarly: "Whilst not anomalous, the Proposed Development would form a prominent new development, drawing wind turbines closer to this vantage point and significantly increasing the influence of such development on the character at this location." (ibid)
11. The substantial adverse impact on the Upper Clyde and Tinto SLA also cannot be denied by the EIA. "The greatest impacts on the SLA would be associated with the amenity of hill walkers on the Tinto Hills from where the Proposed Development would form a prominent new development in views out of the SLA, thereby affecting the scenic quality to the south ... such effects would be Major and significant." (para 4.7.36) "In cumulative terms, the greatest in addition effects on the amenity of hill walkers would accrue at the summit of the Dungavel and Tinto Hills from where The Proposed Development would draw such development closer to the western side of the LCT, constituting a substantial increase in the influence of wind energy development and a Major (significant) cumulative effect." (para 4.7.37) "In combination effects would also be Major (significant) relating to the effect of the existing and consented pattern of development." (para 4.7.38)
12. The EIA introduces the pre-application/scoping Bodinglee scheme since its more damaging potential impact enables the applicant to downplay the impact of Little Gala. However, Bodinglee is irrelevant to the determination of this application since it is not a live application.
13. It is a matter of judgement at what point an impact, or accumulation of impacts, and whether upon a single location or a wider area, becomes unacceptable. It is our judgement that Little Gala represents that point for the specific location of the highly valued Tinto Hills.

Conclusion

14. Mountaineering Scotland has carefully assessed the proposed development. The uplands of South Lanarkshire, and into neighbouring areas, are densely populated with operational turbines with many more consented, in planning or scoping. However, none approach Tinto this closely in this direction of view and would have a direct adverse visual impact upon hillwalkers on the Tinto Hills. Given the regional distinctiveness and significance and popularity of Tinto, it needs safeguarded from development in such close proximity.

15. Mountaineering Scotland **objects** to the proposed Little Gala Wind Farm.

Yours sincerely



Stuart Younie
CEO, Mountaineering Scotland

