

By email to: [Econsents\\_Admin@gov.scot](mailto:Econsents_Admin@gov.scot)

Energy Consents Unit  
The Scottish Government  
5 Atlantic Quay  
150 Broomielaw  
Glasgow  
G2 8LU

return correspondence to:  
[access@mountaineering.scot](mailto:access@mountaineering.scot)

9<sup>th</sup> October 2024

Dear Sir/Madam

**M74 WEST RENEWABLE ENERGY PARK PROPOSAL,**  
**ECU reference: ECU00005019**

### Introduction

1. M74 West Ltd (Renewco Power Ltd) has submitted an application for a wind farm of 22 turbines of 200m blade-tip height northwest of Abington, South Lanarkshire, around 8.5km SSW of Tinto hill. The application also includes solar generation, on which Mountaineering Scotland has no comment.
2. Mountaineering Scotland **objects** to the proposed wind farm development on grounds of visual impact on the regionally significant and popular hills of Tinto (particularly), Lochlyoch Hill and Dungavel Hill.

### 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. 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 windfarm policy approved by the Board of Directors in 2015. 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.

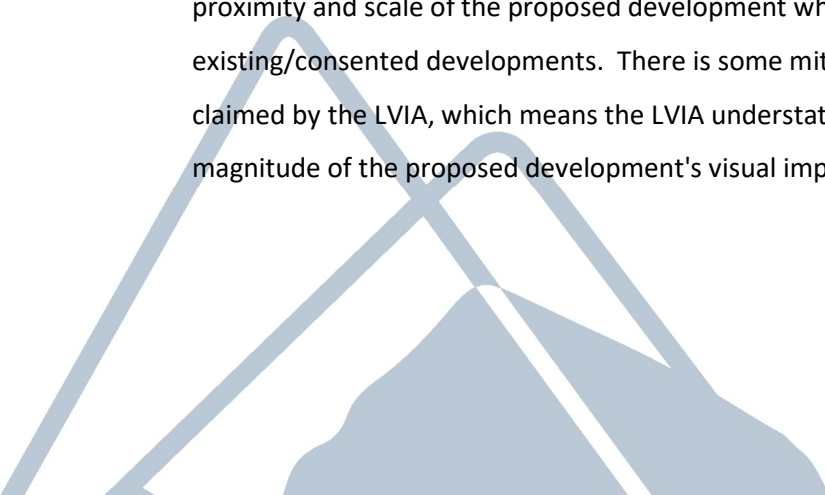
### **Material considerations**

5. Mountaineering Scotland's objection is on the grounds of adverse visual impact upon the regionally significant and popular landmark hill of Tinto (viewpoint 11) and the popular and locally significant hills of Dungavel Hill and Lochlyoch Hill, the latter being part of a high-level route to Tinto.

6. The development site is open undulating moorland that is unexceptional in landscape terms, crossed by the busy M74, and set within a wider area characterised by wind turbines, which exert a characterising visual influence upon a wide area to the northwest, west and southeast of the application site. Turbines are also present more distantly in the view from Tinto to the north. An indication of the density of turbines locally is that Table 4.1 of the EIAR lists over 451 operational turbines within 25km while Table 4.4.1 adds a further 140 consented and 133 in planning.

7. Tinto is a landmark hill, as is Dungavel. Their quality is recognised by inclusion in the Upper Clyde Valley and Tinto SLA. Although the proposed turbines would be seen as clearly below Tinto summit and be backed by more distant turbines in views from the summit, M74 West would diminish significantly the quality of the view and hence the experience enjoyed by hillwalkers on Tinto. This would be particularly strongly experienced by walkers making a circuit using the western (Lochlyoch Hill) ridge of Tinto, where the turbine tips would reach as high as the viewer, as they would for walkers on Dungavel Hill.

8. The LVIA understates the impact on Tinto itself (medium change of moderate significance) and on its setting in the Upper Clyde Valley and Tinto SLA (low change, not significant(minor)) and Rounded Landmark Hills landscape (low change, not significant (minor)). It downplays the impact of proximity and scale of the proposed development while overplaying the mitigating effect of existing/consented developments. There is some mitigation from the context, but not the amount claimed by the LVIA, which means the LVIA understates the scale of visual change and hence the magnitude of the proposed development's visual impact.



9. The proposed turbines would be introduced into a view that is already, taking into account consented developments, characterised by extensive spreads of wind turbines but that does not mitigate the adverse impact of the introduction of such large turbines as those proposed into a significant gap between developments and in close proximity to such a distinctive and popular hill as Tinto, with 'close' applying both to distance and to altitude. On the contrary, the adverse impact is exacerbated by such a significant addition to the cumulative picture.

10. Development has, thus far, respected the situation of Tinto, with the nearest operational turbines being around 8km distant (Clyde WF) to the southeast. In the southwest view from Tinto the nearest turbines are around 12km distant. The application sites of Bodinglee and Little Gala, if consented, would more than halve that to 5-6km. However, Little Gala was refused by South Lanarkshire Council in September 2024 on grounds including "... a significant adverse impact on the landscape character and scenic qualities of the immediate area in which it would be located and on the wider landscape setting ... [It lies] within an area which has been identified to prevent coalescence between existing windfarm clusters and the proposals would result in the development of [i.e. within] a strategic gap which, in turn would lead to an increase in the cumulative effects of windfarm development within the surrounding area, to the detriment of its high landscape and visual quality ... [and] would have a detrimental impact on the scenic qualities of the immediate area in which it would be located and on the visual amenity of visitors to recreational facilities in the area." (SLC Decision Letter 3 Sep 2024)

11. Mountaineering Scotland endorses South Lanarkshire Council's refusal of Little Gala and believes the same conclusion, with the same wording, is equally applicable to M74 West and to the adjacent application site of Bodinglee.

12. It is a matter of judgement at what point an impact, or accumulation of impacts, either upon a single location or a wider area, becomes unacceptable. It is Mountaineering Scotland's judgement that the proposed M74 West development represents that point for the highly valued Tinto and adjacent Lochlyoch and Dungavel Hills. (It previously formed the same judgement for Tinto in respect of Little Gala and Bodinglee.) Development in this area would constitute a very substantial increase in the influence of wind energy development upon the experience of these rounded Landmark Hills and the Upper Clyde Valley and Tinto SLA.

## **Conclusion**

13. Mountaineering Scotland has carefully assessed the proposed development. It would have a significant adverse visual impact upon hillwalkers on Tinto and also upon Lochlyoch and Dungavel Hills. Given the regional distinctiveness, significance and popularity of these hills, such adverse

impact should attract substantial weight in decision-making. Tinto, in particular, should be safeguarded in perpetuity from development in such close proximity, east of the M74.

14. Mountaineering Scotland **objects** to the wind farm component of the proposed M74 West Renewable Energy Park.

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**

