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Dear Sir/Madam

**RIVOX WIND FARM PROPOSAL,**  
**ECU reference: ECU00003293**

### Background and Context

1. Rivox Wind Energy Hub Ltd, a subsidiary of Belltown Power, has submitted an application for a wind farm of 37 turbines of 200-230m blade-tip height, west of Moffat, in Dumfries and Galloway Council area.
2. Mountaineering Scotland **objects** to the proposed wind farm on grounds of cumulative visual impact; Rivox would visually coalesce the South Lanarkshire wind farms with the western Annandale ones, which are presently distinctly separate.
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

#### Context

5. Any assessment of the potential impact on mountaineering of the proposed Rivox wind farm is inevitably shaped by the context of wind farm activity in the area. Immediately north of the site is the Clyde wind farm (south of the M74), with two small adjoining developments consented under separate ownerships. A little to the south of the site lie the conjoined Harestanes and Minnygap wind farms. The Rivox site abuts that of the application Daer wind farm (17 x 180m), to which Mountaineering Scotland has objected on the basis of cumulative impact since, if consented, it would largely fill the visual gap between the Clyde and Harestanes wind farms.

## **Policy**

### **a) Policy**

6. Under NPF4 renewable energy developments attract considerable support in principle. This is, however, subject to site-specific assessment and it is for the decision-maker to balance the various policies and other considerations in respect of a specific proposed development. One of those considerations, the one that usually most affects mountaineering interests, is visual impact.

7. The sections of NPF4 most directly relevant to this objection are (Policy 11, p.53):

"e) ... project design and mitigation will demonstrate how the following impacts are addressed:

ii. significant landscape and visual impacts, recognising that such impacts are to be expected for some forms of renewable energy. Where impacts are localised and/ or appropriate design mitigation has been applied, they will generally be considered to be acceptable;

xiii. cumulative impacts."

8. Both NPF4 (p.7) and the Onshore Wind Policy Statement 2022 (OWPS) (para 3.6.1, p.19) contain the sentence "This means ensuring the right development happens in the right place." For reasons given below, Mountaineering Scotland is not persuaded that Rivox (or Daer) is the right place for a development of the type and scale proposed. The visual harm outweighs the anticipated benefits.

9. NPF4 does not require that all applications are consented. If there was not a continuing requirement for planning decisions to balance the potential benefits and site-specific harms, and sometimes to decide that the latter outweigh the former, there would be no need for proposed onshore wind farms to go through the planning system at all except to agree Conditions. Policy 11 e) ii would not use the word 'generally' if the intention was 'always'.

10. The generic benefits arising from onshore wind development set out in the OWPS – primarily energy generation but also including contributions to peatland restoration, increased woodland, and biodiversity improvement – can be obtained from development in many locations across Scotland. However, where a development would be particularly harmful to a landscape is specific to the individual location. The adverse consequences of an individual scheme should be given significant weight in the planning balance because they attach to the specific location, which cannot be replicated elsewhere, unlike the benefits. It is Mountaineering Scotland's case that the harms from Rivox would outweigh the benefits by a considerable margin.

### **b) Visual assessment**

11. The site itself is commercial conifer forestry. Rivox abuts but is not within any national or regional landscape designation. To its west and south there is an L-shape of Donalds from Comb Law at the northwest to Queensberry in the south. Donalds are hills between 2000 (610m) and 2999 (914m) feet situated south of the Highland fault boundary, i.e. just below Munro height. These are pleasant hills with a natural feel to them, without the man-made clutter that mars the central

Lowthers. They would all have substantial visibility of RivoX. They already have visibility of (south) Clyde and also of more distant wind farms, though Harestanes is almost entirely screened from most by Queensberry, which has an extensive view of it.

12. The scale of the development is worth emphasising. Twenty-nine turbines of up to 230m BTH is a very visible development, especially when placed at a fairly high altitude. The maximum base altitude of RivoX would be c.460-470m with 230m BTH turbines at these positions, giving a maximum tip altitude of 700m OD or just shy of it. This is similar to the height of Queensberry (697m), the highest hill in the area.

13. The mountaineering concern is (1) RivoX creating a perceived visual coalescing of currently clearly separate groups of development; and (2) increased impact of turbines through RivoX's proximity and turbine scale.

14. Mountaineering Scotland's assessment of those viewpoints relevant to its members' interests is given in the table below.

VP N	Viewpoint	Km	EIAR LVIA assessment	Mountaineering assessment
20	Hods Hill - SUW	1.6	Significant (Major)	Agree
4	Queensberry	4.7	Significant (Major)	Agree.
8	Annanhead Hill	5.8	Significant (Major)	Agree
9	Ballencleuch Law	6.4	Significant (Major)	Agree
15	Hart Fell	10.4	Significant (Moderate)	LVIA <b>understates</b> the impact of RivoX occupying much of the current separation gap between Clyde and Harestanes WFs.
9	Lowther Hill	11.5	Significant (Moderate)	LVIA <b>understates</b> the impact of it increasing the horizontal extent of wind turbines, with Clyde continuously visible northeast of Green Lowther from 40-90° then RivoX from 100 to 120°.
17	Gateshaw Rig	12.4	Significant (Moderate)	LVIA <b>understates</b> the impact of RivoX occupying much of the current separation gap between Clyde and Harestanes WFs.
21	Saddle Yoke (1)	12.7	Minor: largely screened by intervening high ground	Agree
22	White Coomb (2)	15.5	Minor: distant, small scale of change in panoramic views	LVIA <b>understates</b> the impact of RivoX being visible in the gap between Clyde and Harestanes. The scale of turbine gives an impact beyond distances at which visibility was previously thought 'acceptable'.
24	Broad Law (3)	19.3	Minor: distant, small scale of change in panoramic views	LVIA <b>understates</b> the impact of RivoX being visible in the gap between Clyde and Harestanes. The scale of turbine gives an impact beyond distances at which visibility was previously thought 'acceptable'.

18	Tinto	26	Not significant (Minor)	Agree: seen at a distance behind, and indistinguishable from, Clyde WF
23	Pykestone Hill	27	Minor: distant, small scale of change in panoramic views	Agree mainly on distance, though the increase in horizontal extent east of Clyde WF is undesirable.

(1) This is consistently incorrectly misspelt Saddle York in the LVIA.

(2) This is consistently incorrectly misspelt Whitecomb in the LVIA.

(3) Figure 5.2.24b (Broad Law) is missing with Figure 5.2.23b (Pykestone Hill) repeated in its place.

We have relied upon Figure 5.2.24a.

15. The LVIA cannot avoid finding that the closest hills (and also Southern Upland Way viewpoints not listed above) would be significantly adversely visually impacted. It understates the impact on middle-distance hills (10-20km), perhaps because it underplays the impact that the greater scale of turbines has upon visibility (perhaps more accurately conspicuity) or because it attaches insufficient importance to the current broad gap between the Clyde and Harestanes clusters, or both.

Rivox would be perceived as visually coalescing the South Lanarkshire wind farms with the western Annandale ones. These are presently distinctly separate with a very clear gap (c.11km) between developments. Consenting Rivox would leave only small gaps (2-4km) between the developments – more in the nature of corridors than the present open area.

Summing up, Rivox would have an adverse cumulative impact whether seen as separate from existing developments or appearing to continue the Clyde or Harestanes clusters. (How it is seen, of course, varies depending on where the viewer is standing.) From all directions, the small separation gaps would be less obvious than the amorphous spread of turbines. 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 Rivox (or Daer) would exceed the threshold of unacceptability by bridging the gap between the extensive west Annandale and even more extensive South Lanarkshire wind farm landscapes.

### c) Socio-economics

Mountaineering Scotland takes a careful approach to the assessment of tourism and recreation impact, specific to the landscape around a proposed development and informed by knowledge of the local context and of the specific segment of the tourism and recreation market most at risk from inappropriate wind farm developments - hill-walkers and other landscape-oriented visitors. This contrasts with most developer-funded assessments, which are typically desk studies and display limited understanding of the local context, local landscape or the landscape-oriented segment of the tourism and recreation market. That is the case here.

Mountaineering Scotland does not disagree with the general proposition that well-sited wind farms have no effect on tourism. But there are two problems with this generalisation.

First, there has been no study of the impact of wind farms in relation to the landscape quality of their settings other than Mountaineering Scotland's reanalysis of Biggar Economics' data which showed a possible negative effect in locally designated scenic landscapes. All other research treats windfarms as if they exist in a landscape vacuum. It is puzzling that no independent research into this has been undertaken. But perhaps potential funders are wary about what it might show.

Second, there has been no study of the impact of wind farms upon different segments of the tourism and recreation market other than Mountaineering Scotland's own survey of its members which suggested a substantial minority of hillwalkers were choosing to reduce visitation to areas

with wind farms. Within an overall scenario of no change in total tourism, different market segments may be on different trajectories. Anecdotal evidence suggests that hillwalking recreation in the Southern Uplands has reduced over the past decade or so, which may be correlated with the increasing presence of wind farms. In other places within easy reach of the Central Belt, e.g. Highland Perthshire, the intensity of hillwalking use is increasing. Perhaps it is just coincidence that areas of increasing intensity of use typically have little visual impact from wind farms. Again, the absence of independent research is puzzling.

The applicant's tourism assessment addresses neither of these points. It presents a circular argument that starts with the absence of high level evidence of wind farms impacting tourism (in general) and then assesses local attractions and accommodation against that and concludes, inevitably, that they would all be unaffected. Such analysis rarely considers hills as 'attractions'. In the Rivox assessment some consideration is given to hill routes but only to claim that the viewer would conveniently be looking in a different direction to the wind farm (Economic Impact Assessment p.33). This approach is absurd. For example, it is claimed that "the major viewpoints (sic) which motivate visitors are the view of the Solway Firth and the Galloway Hills to the South West, in the opposite direction of (sic) the Proposed Development". This is nonsensical. We know of no one climbing Queensberry who looks only to the Solway Firth and Galloway Hills (both 40+km distant) and ignores Hart Fell (<20km distant). But if the tourism and recreation assessment were to acknowledge this, it would mean admitting that the wind farm would intrude into the latter view.

Mountaineering Scotland's assessors' collective field experience gained over very many years on hills in the central Southern Uplands gives us greater understanding of hillwalkers' motivations and how they direct their gaze than whatever has informed Biggar Economics' desk study. The LVIA, while understated at middle distances, also gives a more accurate assessment of the impact upon hillwalkers and (also being based on fieldwork) is to be preferred to the evidence of Biggar Economics in respect of impact on hillwalking.

The economic and employment benefits of wind farm development, regionally and nationally, do not rely upon Rivox proceeding. The continuing attractiveness of the local area to hillwalkers, however, does depend on it not proceeding. In the absence of wind farm development, the relative attractiveness of the area could grow in years to come since – bearing in mind the density of consented developments and applications – it will be rare to experience good quality hills in the Southern Uplands without wind turbines in close proximity.

## **Conclusion**

The proposed development would lead to a perceived coalescence between the currently distinct South Lanarkshire wind farm landscape and the western Annandale wind farms. It would also directly affect a largely unspoilt range of Donalds in its immediate vicinity as well as middle-distance hills such as Hart Fell.

Mountaineering Scotland objects to the proposed Rivox wind farm on grounds of cumulative visual impact.

Yours sincerely



**Stuart Younie**  
CEO, Mountaineering Scotland