



The Mountaineering Council of Scotland

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Debbie Flaherty
Senior Case Officer
Local Energy and Consents
The Scottish Government

16 February 2016

Dear Ms Flaherty

SCOPING OPINION REQUEST FOR PROPOSED SECTION 36 APPLICATION FOR NORTH LOWTHER ENERGY INITIATIVE WIND FARM LOCATED BETWEEN SANQUHAR AND WANLOCKHEAD, DUMFRIES & GALLOWAY.

1. Introduction

We welcome the opportunity to comment on issues to be considered in the environmental impact assessment of the proposed North Lowther Energy Initiative (wind farm) by 2020 Renewables and Buccleuch Estates. The Mountaineering Council of Scotland assesses proposed developments in terms of their impact on Scotland's mountain assets and the mountaineering experience. For wind farms, this mainly means visual impact and this is the focus of our response. We also comment briefly on some other issues.

2. The Mountaineering Council of Scotland (MCofS)

The MCofS is an independent organisation with almost 13,000 members who are hill walkers, climbers and ski tourers. It was established in 1970 as the national representative body for the sport of mountaineering in Scotland. We are recognised by the Scottish Government as representing the interests of mountaineers living in Scotland.

We also act in Scotland for the 75,000 members of the British Mountaineering Council (BMC), which fully supports our policy relating to wind farms and contributes direct financial support to our policy work.

The MCofS recognises the need to move to a low carbon economy but it does not believe that this transition need be at the expense of Scotland's marvellous mountain landscapes. It objects only to proposals that we regard as potentially most damaging to Scotland's widely-valued mountain assets, consistent with our policy as set out in our document *Respecting Scotland's Mountains*.

3. Specific Comments

The development proposed is of up to 42 turbines of up to 150m blade-tip height (BTH). The scoping layout shows turbine bases at c.310-510m OD. At a BTH of 150m, the blade-tips would potentially reach c.660m OD. This would reach higher than most summits in the area apart from the main Lowther Hill – Dun Law ridge.

There is mountaineering interest across the Southern Uplands, mostly undertaken as day recreation. The hills of interest in this area include those classed as Donalds (hills over 2,000' in the Southern Uplands) as well as some lower popular hills, such as Cairn Table.

The proposed viewpoints should give a reasonable representation of the visual impact of the proposed development upon mountaineering interests, specifically viewpoints 1, 4, 10, 11, 16. We do not, however, accept that Cairn Table, at 12km, represents a 'distant view' (Table 5.1) of a development with the size of turbine proposed.

Cumulative impact will be a significant consideration and probably the major factor influencing the MCofS attitude towards a wind farm application in this area. The proposed development area sits between areas of substantial existing operational and consented development – the extensive Clyde wind farm to the east, a cluster of individual developments to the north and northwest, another cluster to the southwest, and the Ae forest cluster to the southeast.

An interesting map would show areas within a cumulative ZTV of all operational and consented wind farms plus the proposed development that would be more than 10km from a wind farm. We suspect that it may currently be a reasonably large area but with the proposed development it would shrink very considerably. The proposed development could thus represent a major spread of the pattern of 'rolling hills with wind farms' already established across much of the Southern Uplands and the impact of this infilling must be fully assessed.

We note the intention to draw on the outdated Glasgow Caledonian University (2008) report. Since major receptors of the proposed development would be hill-walkers, we suggest that their attitudes specifically should be considered. Such evidence is available at [Wind Farms and Changing Mountaineering Behaviour in Scotland](#) (MCofS, March 2014). To pre-empt a possible error we find repeatedly made in applications, we would point out that the GCU report was incorrect to claim that walking/hill-walking tourists held more favourable attitudes than average towards wind farms. A proper analysis of the GCU data, with confidence intervals, shows - as the detail of the report itself states - that there was no significant difference between tourists who gave their main activity as walking/hill-walking and the rest of the sample. For reasons known only to themselves the authors of the report ignored their own analysis and stated elsewhere in the report and in the summary that there was a difference.

We also note the intention to use Strava data and hope that this will be done objectively and not simply quote the PR of Scottish Renewables, whose press release did not place any consistent data in the public domain. This is an important consideration when it is likely that the headline figures are skewed by a small number of locations and not representative of the wider pattern of use.

Sequential analysis of wind farm visibility over the full length of the Southern Upland Way would be a useful contribution to the assessment of cumulative impact on tourism resources in Southern Scotland. Individual wind farm applications consider 'their' section of the SUW but the overall effect is never considered.

4. Conclusion

We hope that addressees consider these comments helpful and look forward to receiving an acknowledgement of safe receipt of this letter.

Yours sincerely

David Gibson
Chief Executive Officer