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30 May 2025

Dear Sir/Madam

Carn Fearna Wind Farm application: April 2023
ECU reference: ECU 00004851

Introduction

1. Statkraft has submitted an application for a wind farm of 9 turbines of 180-200m blade-tip height on an elevated shelf of moorland and rough grazing on the south shoulder of Little Wyvis.
2. Mountaineering Scotland **objects** to the proposed wind farm development on grounds of the adverse visual impact on the nationally significant and extremely popular Munro of Ben Wyvis and Corbett of Little Wyvis, as would be experienced both by walkers on the massif and in more distant views to the massif.

Mountaineering Scotland

3. Mountaineering Scotland is a membership organisation with more than 16,000 members and is the nationally recognised representative organisation for hill walkers, climbers, mountaineers and snowsports tourers who live in Scotland or enjoy Scotland's mountains. It represents, supports and promotes Scottish mountaineering, and provides training and information to mountain users for safety, self-reliance and the enjoyment of the mountain environment.

Policy

4. There is no dispute between the applicant and Mountaineering Scotland on the importance of climate change and the significance that both UK and Scottish governments attach to increasing renewable electricity generation. It is acknowledged that *NPF4* and other Scottish policies and strategies such as the *Onshore Wind Policy Statement (2022)* and the *Draft Energy Strategy & Just Transition Plan (2023)* are highly supportive of onshore wind development. Furthermore, *NPF4* gives renewable energy developments 'National Development' status which means the principle of development (the 'needs case') is taken as established, notwithstanding which the applicant's *Planning Statement* rehearses the arguments at length.
5. Despite the strong facilitative policy support for onshore wind, both *NPF4* (page 7) and the *OWPS* (para 3.6.1) reiterate from previous policy that the goal is the right development in the

right place. It is Mountaineering Scotland's view that the location of the proposed Carn Fearna WF is not the right place. It has come to this conclusion based on an assessment of visual impact and the knowledge that there are extremely popular hills around the site, at distances close enough to experience significant visual detriment, consequentially diminishing the quality of hillwalking experience. This is expanded upon in the following sections.

6. Carn Fearna WF fails to meet NPF4 Policy 11.e.ii. The impact is very clearly not 'localised' and no design mitigation can diminish the prominence of tall turbines sited on such an elevated shelf, visible not only from hill locations but also across a wide area of low ground, from which it is a well-known and loved icon of Easter Ross. The visual impact and detriment is sufficiently substantial and significant as to outweigh the benefits claimed for the development.
7. There is nothing in current national policy that seeks to promote development in inappropriate locations and a small number of proposed wind developments have indeed been refused consent since the introduction of NPF4. Every individual proposed onshore wind farm is not mission-critical for the achievement of national policy goals given the context of a large level of unbuilt consented capacity, a steady and substantial stream of new proposals seeking consent, and an equally substantial stream of Scoping proposals coming forward.¹, Many alternatives to the proposed development are coming forward in less damaging locations.
8. Although the refusal of the previous application for 14 turbines of 115m BTH on the same site in 2014 does not set a precedent, being under a different national planning policy, the same arguments still apply in relation to harm to mountaineering interests. These are expanded upon below. The reasoning in the *Appeal Decision Notice* for Carn Gorm (PPA-270-2117), dated 9 November 2015, although not remaining wholly relevant because of policy changes to favour onshore wind applicants and downplay the importance of landscape and visual impact, is commended to the decision-maker.
9. The proposed development promises a range of benefits beyond simply generating electricity. These should be afforded little or no weight, not because they are unimportant but because they are an accompaniment to any onshore wind development in Scotland. Ecological enhancement is a mandatory requirement for all development under NPF4 so all proposals must comply. All construction generates some economic activity and it is exceptionally rare for a wind farm proposal not to provide the government-recommended 'community benefit' payments. At a Scottish level all these positives are gained no matter where development takes place. Realising them depends on a continuing flow of projects, which there demonstrably is, not on every single proposed project being consented. It is notable that the key blockage to faster deployment is the pace of construction not the level of consents (as is revealed in the *Planning Statement* Table 2.3).
10. There is no requirement in policy, nor is it necessary for addressing the climate emergency, to consent development proposals that are not acceptable in planning terms. Mountaineering Scotland submits that the proposed development is not acceptable in planning terms - the visual detriment substantially outweighs the benefits - and therefore consent should be refused.

¹ At December 2024 there was 1.4GW of onshore wind under construction, 5.4GW consented awaiting construction, and 8.1GW in planning awaiting decision. The corresponding figures for offshore wind are 1.3, 2.3 and 12.8. (Scottish Government *Energy Statistics for Scotland Q4 2024* <https://www.gov.scot/publications/energy-statistics-for-scotland-q4-2024/> accessed 26-4-2025). On any reading this is a substantial pipeline and it has been increasing in recent years.

Landscape and Visual Impact

Preamble

11. For all the appearance of objectivity, professional landscape and visual impact assessments are ultimately subjective judgements. In Mountaineering Scotland's experience, assessments commissioned by developers downplay the impact of proposed development upon the mountaineering experience. Mountaineering Scotland, with an assessment team composed of, informed by and representing experienced 'consumers' of mountain landscapes, believes its judgement of impact provides a complementary and equally valid perspective. Note that words are used here in their ordinary English meaning, not as landscape architects might use them.
12. Mountaineering Scotland is focussed on its members' interests: the enjoyment of mountaineering (which includes hillwalking) in a high quality upland environment. Hence its main concern in relation to wind farms is adverse impact upon visual amenity, in this case upon hillwalkers on the many popular hills around the proposed development.
13. The baseline photography was taken in a range of atmospheric conditions. For viewpoints of interest to mountaineering, many of the baseline photographs do not represent the 'worst-case' scenario, being hazy or dull (overcast conditions), and could give a misleading impression of the visibility of the site and of just how visible and prominent turbines of the size proposed actually can be in clear atmospheric conditions. This applies particularly to An Cabar (VP5) at only 4km distance but would also, for example, apply to Beinn a' Bha'ach Ard (VP30) at 20km where on a clear day the turbines will be front-lit by the sun and appear much more striking than the dim photomontage, and to Knockfarrel (VP11, 8km) where a morning photo would be quite different to the baseline one looking sunwards in late afternoon.

Assessment

14. The proposed development site itself is of limited mountaineering interest. Mountaineering Scotland's substantive interest is the views to the site from elevated locations, though it is also mindful that the Ben Wyvis massif viewed from low ground is an iconic hill for Easter Ross residents and visitors. The hills of particular interest for mountaineering that would be within the ZTV of the proposed development are, in order of importance and impact, the extremely popular Ben Wyvis Massif, the Fannichs, the Strathvaich Forest hills, and the hills south of Strathconon and Strath Bran.
15. The site itself is undesignated, though overlaps the southern tip of the Rhiddoroch – Beinn Dearg – Ben Wyvis. Wild Land Area (WLA) and the Ben Wyvis Special Landscape Area (SLA). Many of the locations of mountaineering interest lie within WLAs or SLAs. (For the avoidance of doubt, Mountaineering Scotland's assessment is restricted to visual amenity and consequential impacts upon the quality of mountaineering experience and does not extend to assessing impacts on the qualities of designated or otherwise defined areas in themselves.)
16. The table below assesses daylight impacts for those Viewpoints relevant to Mountaineering Scotland's interests. We are grateful to the applicant for the inclusion, at Mountaineering Scotland's suggestion, of Am Faochagach (VP32) and An Coileachan (VP31). Where Mountaineering Scotland disagrees with the LVIA assessment this is highlighted in bold. The Lochluichart/Corriemoille/Kirkan cluster is abbreviated to LCK.

Viewpoint (nearest turbine)		ElAR assessment	Mountaineering Scotland assessment
Ben Wyvis massif			
VP4	Little Wyvis (1km)	Solus: major, significant. Cumulative: medium, significant.	Concur with ElAR assessment, though the cumulative assessment somewhat flatters Carn Fearnna. There is a very close view down onto pale backclothed turbines, gravel tracks and hardstanding. The LCK cluster is prominent to the west which detracts from that angle of view and accordingly increases the value of other angles of view. Fairburn is in the southward angle of view, meaning the viewer would see it behind Carn Fearnna but it is much distant (12km) and this effect is magnified by its turbines being much smaller (100m BTH). In poor lighting, as in the baseline photography, it can be quite recessive.
VP5	An Cabar (4km)	Solus: major, significant. Cumulative: medium, significant	Concur with ElAR assessment, though the cumulative assessment somewhat flatters Carn Fearnna. There would be a very close view down onto contrastingly backclothed turbines from a key resting point on the very popular ascent/descent of Ben Wyvis. It is a more pleasant place to sit than the summit itself where being seated limits the view. The LCK cluster is prominent to the west which detracts from that angle of view. Fairburn is in the southward angle of view, just left of Carn Fearnna, but with smaller, more distant turbines (14km) only dimly showing in murky baseline photography.
VP6	Ghlas Leathad Mor (6km)	Solus: moderate, significant. Cumulative: moderate, significant	The solus effect is underrated. The cumulative assessment somewhat flatters Carn Fearnna. The sharp baseline photography demonstrates that even a limited number of blades can be intrusive in the wrong place. They would be particularly visible on descent with blades flickering in the downward-inclined eyeline. The band of cloud on the baseline photography obscures Novar and extension turbines (8km) which otherwise would give an impression of ringing by wind farms on three sides at not dissimilar distances: Carn Fearnna to the south, Novar to the north, and LCK to the west. Fairburn is also mostly obscured by cloud but the few turbines visible are brighter than in the murky baseline photography for VPs 4 and 5, thus more realistically depicting the contrast of distance and scale with Carn Fearnna.
Fannichs			
VP31	An Coileachan (19km)	Solus: moderate-minor, not significant. Cumulative: moderate-minor, not significant	The solus effect is distinctly underrated. The non-significant cumulative assessment flatters Carn Fearnna. Although seen in the context of the nearer LCK cluster, Carn Fearnna would appear behind and above this cluster giving the impression of both an isolated small development and (with Fairburn further back to its right though not obvious in overcast baseline photography) and of a more extended area of wind farms – a double whammy. The impact is moderated by distance and the nearer LCK but exacerbated by the

			mix of backclothing and skylining. In its perched position, in clear visibility, Carn Fearna would certainly not be merely "slightly apparent" (7.12.505) nor would it "appear to be integrated with the Lochluichart and Corriemoillie cluster" (7.12.510).
Strathvaich Forest hills			
VP32	Am Faohagach (20km)	Solus: moderate-minor, not significant. Cumulative: moderate-minor, not significant	The solus effect is distinctly underrated. The non-significant cumulative assessment flatters Carn Fearna. Although seen in the context of the nearer LCK cluster, Carn Fearna would appear on a shelf interrupting the descending ground from the massif, well above the glens, and separate from the cluster. In its perched position, in clear visibility, it would certainly not be merely "slightly apparent" (7.12.520) The impact would be moderated by distance but once again Carn Fearna would produce a double whammy giving the impression both of an isolated small development and of a widening landscape of wind farms extending beyond the cluster. There is no integration with the cluster nor would construction of Kirkan and Lochluichart 2 Variation in any way "increase the integration between the Proposed Development and operational wind farms" (7.12.526).
WL VP2	Beinn a' Chaisteil (17km)	n/a	Although seen in the context of the nearer Lochluichart and Kirkan, Carn Fearna would give the double whammy impression of both an isolated small development and a widening landscape of wind farms extending beyond the cluster. Although moderated by distance, the effect would be significantly adverse.
WL VP3	Beinn nan Ramh (28km)	n/a	Although the distance would render the effect non-significant (but not insignificant in the right light), this demonstrates how the elevation and separation of Carn Fearna, as the only apparent high level wind farm in view and with turbines both backclothed and skylined, would create an impact and penetration into wilder hillscapes disproportionate to a mere nine turbines.
Hills south of Strathconon and Strath Bran			
VP29	Sgurr Mhuilinn (17km)	Solus: moderate-minor, not significant. Cumulative: moderate, not significant	The solus effect is markedly underrated. The cumulative 'Not significant' rating understates the impact. Carn Fearna would be seen as an isolated development occupying a high shelf as the massif descends from the ridge of Ben Wyvis to the deep glens. The effect is moderated by distance but not to the extent claimed in the EIAR because of the isolated appearance of Carn na Fearna. There is no "similarity in layout of the Corriemoillie/Lochluichart cluster and the Proposed Development" (7.12.478). The cumulative effect is significant because Carn na Fearna would remove the visual separation between LCK and Fairburn, with all being in the range of 11-17km (the largest turbines being the more distant). Potentially all could be front-lit by afternoon sunshine rather than

			the cloudy haze of the baseline photography. The double whammy applies.
VP30	Beinn a' Bha'ach Ard (20 km)	Solus: moderate-minor, not significant. Cumulative: moderate, not significant	The solus effect is markedly underrated. The cumulative 'Not significant' rating understates the impact of creating a new focal point. Carn Fearna would be seen as an isolated development, perched as the massif declines to the glen. It would be flanked obviously to the west by LCK and possibly by repowered and extended Novar distantly above Sgurr a' Phollain, which partly obscures the current turbines. The effect would be moderated by distance but not to the extent implied by the cloudy, hazy baseline photography. The double whammy applies.

17. No amount of design work can overcome the wrong choice of location. And this is the wrong choice. At best, design on a poor site can give a neater appearance – as is the case here – but it cannot eliminate the adverse impact stemming from the location being wrong. Reduced visibility is still visibility, as can be seen, for example, in Figures 25 and 26 in the *Design Statement* or VP2. Furthermore, when seen from elevated locations the Carn Fearna turbines would typically be backclothed by darker landform, with the contrast increasing their visibility. Thus even blades can be intrusive when seen at close distances where their movement is obvious (cf VPs 4-6).
18. The *Design Statement* (Section 10.2) seeks to dissociate the proposed development site from the Ben Wyvis massif but it is an integral, albeit lower, part of the massif before it drops to the much lower ground west, south, and east (cf Figure 7.2 and *Design Statement* Figure 16). The proposed development would form a new kinetic focal point in the landscape, competing with the rest of the massif for the attention of the viewer with sight of the whole massif from east, west or south.
19. The EIAR is at pains to claim that there would be little effect from Carn Fearna on Glas Leathad Mor, which is claimed to be the popular and thus most sensitive to impact of the viewpoints on the massif. It is a fact that Little Wyvis is not as popular but An Cabar is a key staging post on the route up Ben Wyvis to Glas Leathad Mor and arguably more often visited than the summit itself since some people choose to visit it on both the ascent and descent. To seek to downplay the impact by directing attention onto Glas Leathad Mor is a distraction technique similar to that also employed when it is claimed that the viewer's attention would be in any direction but that of the proposed development. The essence of panoramic views is that they are *panoramic*, not a segment.
20. The cumulative impact of Carn Fearna with existing operational and consented wind farms would be markedly adverse, adding spatial depth and extending the sense of wind farms spread across the landscape where seen together or sequentially with the LCK cluster. This is despite the extensive ZTV of the cluster, which is unhelpfully presented in the EIAR as four separate ZTVs (Figures 7.15 j, q, u and v) rather than a single combined one, which would be much more illuminating for the the decision-maker. It must be emphasised that it is Carn Fearna's positioning within the landscape in relation to the cluster that would boost its adverse impact, not simple visibility.
21. Other wind farms would have a limited effect either in combination or sequentially. This could change radically if current proposals (scoping) for Tarvie, Fairburn Extension, and Ballach to the

south of Ben Wyvis progress, potentially creating an extensive cluster exceeding that of LCK for spread and depth (Figs A7.4.4 to 6). Their impact could be substantial upon views from the Wyvis massif but from other viewpoints, looking to the massif, their impact may be more muted since Carn Fearnha could still appear as an isolated location. It is simply a bad site for wind development.

22. The Design Statement concludes: "Overall, the Applicant's landscape advisors are of the view that the Proposed Development is appropriate and acceptable in terms of its design relationship with the landscape and visual context." (20.1.6) These are the same landscape advisors that acted for the previous applicant (OPEN with Mr James Welch as Landscape and Visual Expert Witness) when the Reporter refused the appeal because *inter alia* "The proposed development would have an unacceptable impact on and would be significantly detrimental to the Ben Wyvis special landscape area." (*Appeal Decision Notice* for PPA-270-2117, dated 9 November 2015, para 126) Their advice was demonstrably flawed then and it remains so now.

Impact on the Mountaineering Experience

23. The 'mountaineering experience' is a complex phenomenon. Mountaineers have multiple motivations, both individually and collectively. Very few go into the hills only to tick a list or achieve some challenge regardless of their surroundings. Even a cursory glance at hillwalking magazines or chat on the hill shows that quality of visual experience (the view, the scenery) is important. So too are feelings evoked by the physical experience of remoteness, perceived wildness, and engaging with hard terrain. The experience is enhanced by engagement with nature both visually and aurally. The resultant benefits to physical and mental health are increasingly recognised and promoted. Not all of these elements are necessarily present on any one walk, and the variety of experiences within a walk and on different walks is itself part of the joy of hillwalking.
24. None of this is understood by those who feel able to pronounce on the potential impact of proposed development on mountaineering without presenting or citing any meaningful empirical evidence on the motivations of mountaineers (or any other countryside users) either in general or with regard to a specific route or area. It is noted that the EIAR acknowledges that no fieldwork was carried out for the recreation assessment (14.4.28). If there had been or if the assessors knew the area then Corrieshallach and Falls of Measach might not have been listed as two attractions when they are the same place, nor would descent to that tree-enclosed gorge be considered as a 'hill' trail (14.5.34). Nor would a key viewpoint on Ben Wyvis – An Cabar (VP5), classed as a Munro Top – be wrongly referred to as a 'corbett' (*sic*) (14.8.60).
25. As the national membership organisation for mountaineering in Scotland, Mountaineering Scotland is well placed to know what motivates and disincentivises mountaineers through its daily contact with a wide range of mountain-goers. The evidence from surveys of mountaineers – not general tourists – suggests that some activity is indeed being displaced from areas with wind farms to areas without.
26. Mountaineering Scotland undertook a membership survey in 2016 and repeated the same question in 2023 asking respondents if their behaviour had changed in response to wind farms. The results were statistically the same for the two years, analysed using 95% confidence intervals. Averaged, they suggest that 20% of hillwalkers would avoid an area with wind farms and go elsewhere while 42% would still go to an area with a wind farm but experience diminished enjoyment. In contrast, only 2% would go to such an area more often. It would have no impact on 35%. These surveys did not ask about motivations directly, but the behavioural responses recorded suggest that they include a strong visual element. There is no evidence that

hillwalkers want to see wind farms built so they can 'benefit' from using the gravel roads for access. It is unknown if there are threshold effects as wind farms increase in an area, appearing at different distances and angles of view, but it is not unlikely.

Conclusion

27. The above assessment shows that the proposed wind farm would have a significant adverse visual impact upon the popular hills in the surrounding area, particularly but not limited to Ben Wyvis. It would also adversely affect views to this regionally emblematic hill.
28. The proposed development is contrary to national policy (NPF4). Its siting would not 'preserve natural beauty'. It would have a significantly adverse impact upon the visual amenity and overall experience of those visiting the hills and of those viewing Ben Wyvis passively.
29. Mountaineering Scotland **objects** to the proposed Carn Fearna wind farm.

Yours sincerely

REDACTED

Stuart Younie

CEO, Mountaineering Scotland

