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11th August 2025

Dear Sir/Madam,

Re: Application for the proposed Windburn Wind Farm

ECU00004782

Thank you for the opportunity to respond to this planning application.

1. Windburn Wind Farm Ltd, a joint venture of Wind2 Ltd and Octopus Energy Generation, has submitted an application for a wind farm of 13 turbines of 149.9m blade-tip height on the upper slopes of the Ochil Hills just west of Ben Cleuch.
2. Mountaineering Scotland **objects** to the proposed development on grounds of visual impact on the regionally significant and highly popular Ochils Hills.

Mountaineering Scotland

3. Mountaineering Scotland is a membership organisation with more than 16,000 members and is the only recognised representative organisation for hill walkers, climbers, mountaineers and snow sports tourers in Scotland. We represent, support and promote Scottish mountaineering, and provide training and information to mountain users to foster self-reliance and safe enjoyment of our 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 onshore wind 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.

5. Notwithstanding the strong 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 Windburn development is not the right place. It has come to this conclusion based on an assessment of visual impact and the extreme popularity of the hills beside the site, at distances close enough to experience significant visual detriment, diminishing the quality of hillwalking experience. This is expanded upon below.

6. Windburn fails to meet NPF4 Policy 11.e.ii. - the impact is would not be 'localised'. Windburn impacts upon the whole of the high ground of the western Ochils as well as intruding into the view of the Ochils from the south. Even if this is considered to be 'localised', the adverse impact upon this local area is very high. No design mitigation can diminish the prominence of a poorly chosen, high-altitude location.

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 under NPF4. Not every individual proposed onshore wind farm is mission-critical for the achievement of national policy goals given the context of substantial unbuilt consented capacity, a steady and substantial stream of new proposals seeking consent, and an equally substantial stream of proposals seeking scoping opinion coming forward.[1] Many alternatives to the proposed Windburn development are coming forward in less damaging locations. Though the renewables industry argues that faster consenting is key to meeting onshore wind targets, the data suggests that the real bottlenecks are actually slow post-consent investment decision-making and construction. Mountaineering Scotland has observed that very little consented onshore capacity has not eventually been built but sometimes only many years after consenting.

8. As well as generating electricity, a range of other benefits are claimed. These should be afforded very little weight, not because they are unimportant but because they apply to any onshore wind development in Scotland.

[1] At March 2025 there was 1.7GW of onshore wind under construction, 5.4GW consented awaiting construction, and 8.8GW in planning awaiting decision (Scottish Government *Energy Statistics for Scotland Q1 2025*). On any reading this is a substantial pipeline and it has been increasing in recent years while the pace of building remains low, with no year except 2017 ever having exceeded 1GW becoming operational (https://scotland.shinyapps.io/sg-scottish-energy-statistics/?Section=RenLowCarbon&Subsection=RenElec&Chart=RenElecCapacity accessed 23-6-25).

a) Ecological enhancement is a mandatory requirement for all development under NPF4 so all proposals now comply. Such enhancement and restoration is very welcome but it need not and should not be achieved at the expense of a severe impairment of visual amenity arising from a poorly located wind farm in a highly popular landscape.
b) Many wind farm applications include a small amount of battery storage which, as here, is typically trivial compared with grid-scale stand-alone storage now being built elsewhere.
c) All construction generates economic activity.

At a Scottish level all these positives are gained no matter where development takes place. The detriments are site-specific whereas the benefits are not. Realising the benefits depends on a continuing flow of suitable projects across the country, which there demonstrably is, not on every individual project being consented regardless of the level of detriment.

9. In government policy, strategic significance has been attached to onshore wind development, not least through designation of the sector as a National Development. It is, however, the sector as a whole to which strategic significance attaches, not to any individual proposal unless there were to be a shortage of proposals, which there is not.

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 Windburn development is not acceptable in planning terms - the visual detriment in a very popular area outweighs the benefits - and therefore consent should be refused.

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 'users' of mountain landscapes, believes its judgement of impact provides a complementary and equally valid perspective.

12. Mountaineering Scotland is focussed on its members' interests: the enjoyment of mountaineering (which includes hillwalking) in a high-quality upland environment. Its main concern in relation to wind farms is therefore any adverse impact upon visual amenity, in this case upon hillwalkers on the exceptionally popular Ochil Hills.

Assessment

13. Mountaineering Scotland's interest is triggered by the popular hills close to the site, including Ben Cleuch but extending to the spine of the western Ochils and the glens, ridges and outliers to north and south of the spine, from Dumyat to Innerdownie. For brevity this is referred to as the western Ochils. Further east, beyond Glens Devon and Eagles, there is less hill-walking use and the quality is already compromised by the operational Green Knowes wind farm as well as

extensive plantation forestry.

14. Key issues for Mountaineering Scotland are:

    - impact on views within the western Ochils,
    - impact on views outward from the western Ochils, particularly to the Southern Highlands,
    - impact on views towards the southern scarp of the western Ochils,
    - and for all of the above, the cumulative impact with the Burnfoot-Rhodders cluster.

15. The Ochils are a landmark range of hills, visible and easily accessed from a wide area of central Scotland, with an iconic south-facing scarp, wide-ranging views, and criss-crossed by well-used, popular walking routes. Dumyat is a very popular, easy walk suitable for all ages yet offering superb views. Many people climb Ben Cleuch and many continue at a high level east (Andrew Gannel Hill, King's Seat) or west (Ben Buck, Ben Ever) to make a circuit from Tillicoultry. A classic route is the skyline spine from Blairdenon to Innerdownie taking in seven of the nine Donalds[2] in the Ochils with the two south of the spine also included by some people. As the crow flies, it is only just over 10km from Blairdenon to Innerdownie. Windburn wind farm infrastructure would straddle the spine between Blairdenon and Ben Buck and occupy 2km of that distance.

16. The proposed development site, set on a landscape of rounded hills and ridges with incised burns and crossing the watershed, is inaccurately described in the Planning Statement as a 'bowl' (Table 7.4). It is noteworthy that nowhere in the LVIA is the term bowl used to describe the site.

17. The operational Burnfoot-Rhodders wind farm cluster lies within 1km of the proposed nearest Windburn turbine. Windburn and the cluster might be seen as a single entity from some directions, albeit with differences in turbine scale. The turbine base altitudes would be broadly similar, though the taller Windburn turbines would reach a slightly higher blade-tip altitude. The different siting of Windburn, however, would mean it introduced impacts not presented by the Burnfoot-Rhodders cluster. Windburn alone would be visible from lower elevations to the south of the Ochils; it alone would be visible from Dumyat; it would create a panorama of turbines viewed from Ben Cleuch, extending the present <50° of Burnfoot-Rhodders turbines to >100° (and 145° if Green Knowes is included); it would increase the view of turbines at Blairdenon (not included as a Viewpoint) from, roughly, 45° to 90° in part because the turbines would be just over 1km distant compared with the cluster at over 2.5km. In short, Windburn would significantly intensify and extend the influence of wind turbines in the western Ochils.

18. The turbine area straddles Perth and Kinross and Clackmannanshire Council areas. It is within the Ochils Hills Local Landscape Area in the former and the Ochils Special Landscape Area in the latter (these are different terms for the same designation). The LVIA concludes that the integrity of neither designation would be affected by the proposed development. Mountaineering

[2] Hills over 2000 feet south of the Highland Boundary listed by the Scottish Mountaineering Club.

Scotland's view is that it would severely degrade both, extending and intensifying the presence of turbines and visible from all the high Ochils west of Glens Devon and Eagles; and also be damaging to the Western Ochils LLA of Stirling Council which is omitted from Figure 7.5a. For the avoidance of doubt, Mountaineering Scotland's assessment is restricted to the visual amenity experienced from, or looking to, mountain landscapes and consequential impacts upon the quality of mountaineering experience. It does not extend to assessing impacts on the qualities of designated or otherwise defined areas in themselves.

19. The table below assesses the visual impact at those Viewpoints relevant to Mountaineering Scotland's interests and one very pertinent location not included in the LVIA.

Viewpoint (nearest turbine)		**LVIA assessment**	**Mountaineering Scotland assessment**
1	Ben Cleuch (2.0 km)	Major, Significant	Agree. The spectacular view from Ben Cleuch west and north-westwards into the Southern Highlands would be foregrounded by Windburn at close range. While the turbines do not directly interrupt the skyline view (as per the design brief), their movement in direct line of sight would be a substantial distraction and diminish its quality significantly. The highest blade-tip altitude (704m OD) would be only slightly below Ben Cleuch's 721m summit. The angle of view occupied by turbines would more than double, extending turbine foregrounding to the pre-eminent views to Bens Lomond, Ledi, More and Vorlich.
2	The Nebit (2.2 km)	Moderate, Significant	Agree. The impact is moderated because only a limited number of blades and tips are visible. The LVIA only refers to proximity and does not mention the distracting effect of moving blades which is an important element of the impact from such partial visibility.
3	Innerdownie (8.0 km)	Moderate, Significant	Agree. The impact is moderated by the visual merging of Windburn behind the Burnfoot-Rhodders cluster. The combined effect would be a minimal widening of the turbine view but a notable intensification.
4	Dumyat (5.4 km)	Moderate, Significant	The effect would be **Major, Significant.** There is currently no visibility of turbines looking from Dumyat to the rising Ochils ridges and summits. The design brief was to "avoid turbines appearing too

			numerous and too dominant from the summit of Dumyat (VP3) (*sic*) (which is one of the most popular hill summits in the Ochils and which currently has no visibility of the operational wind turbines within the Ochils)" (Para 7.87). It is Mountaineering Scotland's view that these subjective criteria are not met by any design that intrudes moving blades high above the viewer into the landscape between Blairdenon Hill and Ben Cleuch. It is notable that the design work between Scoping and Application layouts achieved only the elimination of 2 tips from the visibility at this point, leaving 2 hubs, 3 blades and 3 tips still visible.
Fig 7,32	Ben Ever (Wireline) (1.3 km)	Not assessed but impact stated as comparable with Ben Cleuch (Table 7.16 VP1)	The LVIA implies **Major, Significant**. This is agreed. The impact would be very similar to that at Ben Cleuch.
	Blairdenon Hill (Not illustrated) (1.0 km)	Not included in assessment	Remarkably, no comment is made on Blairdenon Hill in the LVIA despite it being the most westerly of the Ochils 2,000 foot hills (AKA Donalds) and occupying a similar position to the west of the site as Ben Cleuch would to the east. It is also where the three locally designated landscape areas meet. The impact from a close-range, full view of the entire turbine area – and needing to cross it if linking onwards to/from Ben Cleuch – would be **Major, Significant**.

20. The proposed development would be a major intrusion, with an impact far exceeding that of the operational Burnfoot-Rhodders (and Green Knowes). Larger turbines would be inserted into a key angle of view and straddle the high spine of the western Ochils. The access road, with a wide pale surface, would also be significantly visually harmful both in views within the hills (as would be the crane pads) but also in views of the hills from the north. The total visual impact of the proposed development might be argued to be 'local' but the locality in which it would be experienced is of extremely high value regionally and very popular.
21. It is not only the 'local' effects upon the western Ochils themselves that are significant. The Ochils scarp is a prominent and distinctive feature in the view from a considerable swathe of Falkirk, Clackmannanshire and Stirling. It is one of the most outstanding topographic features of Central Scotland. A number of viewpoints to the south and west of the proposed development, at distances from 9-21km, show that several hubs, blades and tips of the proposed development

would be visible (VP9, 14,-16, 20[3]), typically 3-4 hubs, 2 blades and 2 tips. These would be seen potentially front-lit, with the sun behind the viewer, increasing the visibility of the turbines against a blue sky. The LVIA implies that turbines being visible in other directions mitigates the impact of introducing them into a new direction – it most certainly does not. The applicant might argue that the subjective design criteria "to design a layout that reduces visibility of turbines and avoids turbines appearing too numerous and too dominant above the Ochils escarpment in views from the low-lying carseland to the south, whereby the Ochil Hills forms a prominent backdrop to this lower lying landscape" (para 7.87) has been achieved but this is to ignore the eye-catching nature of even a small number of moving pale blades flickering in the sunlight.

22. As Figures 2.3 to 2.6 show, design tweaks may reduce visibility or reduce the perceived impact of visibility but cannot make an unacceptable location acceptable or invisible.

The mountaineering experience

23. The 'mountaineering experience' is a complex phenomenon. Mountaineers have multiple motivations, both individually and collectively. However, 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 invoked by the physical experience of perceived remoteness and 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.

24. As the national membership organisation for mountaineering in Scotland, Mountaineering Scotland has a good sense of what motivates and disincentivises mountaineers through its daily contact with a wide range of hill-goers. The evidence from surveys of mountaineers, not of general tourism, suggests that some activity is displaced from areas with wind farms to areas without.

25. Mountaineering Scotland undertook a 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. It could be hypothesised that this latter group might make less frequent visits as a consequence. In contrast, only 2% would go to such an area more often. It would have no impact on 35%. Note the sum is 99% because of rounding. The surveys did not ask about motivations directly, but the behavioural responses recorded and the anecdotal evidence from talking to hillwalkers suggest that they include a strong visual element.

26. These results can be placed alongside those from the recreational survey in the EIAR (Technical Appendix 13.1, p.12). The two sets of results, while obviously not directly comparable, appear to be telling a consistent story. Of course, a survey of current users, such as the Windburn survey,

[3] It should be noted that these Viewpoints baseline photography was taken in very soft light and this allows the turbines to be rendered unrealistically faintly in the photomontages. The wirelines are to be preferred.

cannot include anyone who has already chosen to avoid the Ochils.

Response option wording		Response (%)	
Windburn survey (Presence of wind turbines in Ochils is)	MScot survey (Behaviour in relation to wind farms)	Windburn survey	MScot surveys
Good	No effect/go more	46	37
Neither	Diminished enjoyment	38	42
Bad	Avoid	16	20
Base number (average of 2 surveys for MScot)		N=83	N=936

27. It seems reasonable to equate 'neither good nor bad' with 'diminished enjoyment' based on the comments listed which suggest many hill-goers' attitude to wind turbines is resignation, or 'apathy' as the EIAR puts it. Whether attitudes and behaviour are maintained or change in the future cannot be predicted from the Windburn survey since it asked about the current position, not the desirability of more and larger turbines either in the abstract or specifically in the proposed Windburn location.

28. The EIAR recreation usage study confirms that the Ochils are well used, popular hills of regional significance. Mountaineering Scotland cannot understand the rationale for the EIAR statement that, "The access land [a term more commonly used in England] in this area is considered to be of local importance and low sensitivity." (Para 13.113). It is agreed that it is of local (regional) importance but it certainly does not follow that it is of low sensitivity. The LVIA neither applies nor supports the attribution of 'low sensitivity' to western Ochils Viewpoints.

29. The recreation study results confirm the personal knowledge of the Mountaineering Scotland assessors that the Ochils are well-used not only for full-day walking but also for part-day and evening walks (and runs and cycles) by local residents. Accessibility is a key attribute of these hills. Nonetheless, Mountaineering Scotland has a number of concerns about the robustness of the recreational data and its interpretation.

30. The usage data is cited as showing "a sustained growth in numbers of users within the Ochil Hills by almost 6%" between 2021 and 2023, and growth of 17.5% between 2021 and 2022 (TA A 13.1, p.7). The growth was not *sustained* over the period. Numbers rose by 17% from 2021 to 2022 then fell by 10% between 2022 and 2023, which would be consistent with the nationwide surge in use of local outdoor resources during and immediately following the pandemic followed by a reduction in their use as wider travel became possible and people gained confidence in travelling to more distant locations.

31. Comparison of people counter data from 2023 with that from 2006 shows a 47% increase in numbers accessing the western Ochils (TA13.1, p.7). This reflects a general increase in active outdoor activities such as hill-walking, running and mountain-biking over the period rather than anything specific to the Ochils. The TA (p.14) reports an average increase of 32% over the period

across 120 UK monitoring stations with ranges from 21% to 51%. No information is provided on how comparable these sites are to the Ochils. Mountaineering Scotland has no data for other hill-walking locations in Scotland over the same time period but a comparison can be made with Mountaineering Scotland's membership, which rose by 74% over the same period[4] or the number of Munro completers which was around 30% higher in 2023 than in 2006. None of these figures is in any way conclusive other than showing a general increase which, as an accessible regional outdoor resource, the Ochils have also shown.

32. Mountaineering Scotland considers it unwise to place too much weight on Strava data. Most hillwalkers do not use it. The EIAR states, "From Strava heatmap data (Strava, 2024), the routes listed above [mostly Core Paths and Rights of Way] are used for recreational purposes, particularly walking with some cycling, however, the wider site[5] beyond formal recreational routes shows less evidence of activity."(Para 13.112). However, the routes listed omit all those to and between hill summits. Nonetheless, while regarding it as an unreliable source of hillwalking data, the Heat Map does in fact show a significant level of use of the Tillicoultry-Ben Cleuch-Ben Ever-Tillicoultry circuit and noteworthy levels of activity throughout the high tops and ridges of the western Ochils, including from Ben Cleuch across the proposed Windburn site to Blairdenon and down to Sheriffmuir.

33. The proposed link path between the Silver Burn - Glen Winnel track and the wind farm roads is likely to be attractive to only a few walkers. Most head east from the end of the current track towards Ben Buck and Ben Cleuch but some may wish to walk on the roads through the wind farm to reach Blairdenon Hill. Most will walk it not from choice but because it is 'there' where they were going to walk anyway linking Ben Buck and Blairdenon.

Summary

34. The above assessment shows that the proposed Windburn wind farm would have a significant adverse visual impact upon the extremely popular western Ochil Hills. Its very different siting and design compared with the operational Burnfoot-Rhodders cluster would fail to integrate the two developments in views within the western Ochils while from Dumyat and in more distant views from the south it alone would appear.

35. The popularity of the Ochils Hills as an accessible regional lung is evident in the foot-worn tracks in the hills themselves and from the applicant's recreational survey. It is the Holyrood Park of mid-Scotland and is equally treasured by residents, even those who never set foot in them.

[4] From 9,366 to 16,254

[5] 'Site' here appears to mean 'area' though, confusingly, the earlier (unquoted) part of the paragraph uses it to mean the specific application site.

Conclusion

36. 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 popular western Ochils and upon views towards the scarp.
37. Mountaineering Scotland **objects** to the proposed Windburn wind farm.

Yours sincerely,

Stuart Younie

CEO, Mountaineering Scotland