MOUNTAINEERING SCOTLAND WALKCLIMBSKI

The Granary | West Mill Street | Perth | PH1 5QP
T: 01738 493 942 **E:** info@mountaineering.scot
www.mountaineering.scot

By email to: Econsents_Admin@gov.scot

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

6th October 2026

Dear Sir/Madam,

Re: Application for the proposed Forsinain Wind Farm ECU00004935

Background and Context

1. Mountaineering Scotland is a membership organisation with 16,000 members and is the only recognised representative organisation for hill walkers, climbers, mountaineers and ski-tourers who live in Scotland and 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 responsible enjoyment of our mountain environment.

2. Forsinain Forest Wind Farm Ltd, a wholly owned subsidiary of Low Carbon Ltd, has submitted an application for a wind farm of 12 turbines, 10 of 219m blade-tip height and two of 206m BTH, just north of Forsinard in Strath Halladale, Sutherland.

3. Mountaineering Scotland **objects** to the proposed development on grounds of visual effect on a highly distinctive landscape within a Scottish context.

Policy

4. There is no disagreement 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 such development (the 'needs case') is taken as established, despite which the applicant's Planning Statement reiterates it at length. It is, however, the sector as a whole to which strategic significance attaches, not to any individual proposal.

CLIMB SCOTLAND

sport scotland LOTTERY FUNDED

Mountaineering Scotland is a registered trademark of the Mountaineering Council of Scotland Limited. Company No: SC322717

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 development is not the right place. It has come to this conclusion based on a careful assessment of visual effect. This is expanded upon later.

6. There is nothing in current national policy that seeks to promote development in inappropriate locations and a number of proposed wind developments have indeed been refused consent under NPF4. The climate/carbon priority in NPF4 is not to be read as a trump card that automatically outweighs all other factors in decision-making. Of particular note is the refusal in January 2026 of the Kirkton Energy Park (ECU00003244) at the north end of Strath Halladale because of its potential significant adverse effects on the Flow Country World Heritage Site, which it partly abutted and partly lay within. Oddly, this very relevant decision is not directly addressed in the applicant's *Planning Statement*, perhaps because it sits uncomfortably with the arguments in favour of the proposed development made therein.

7. 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 large steady stream of new proposals seeking consent, and an equally large stream of Scoping (pre-planning) proposals coming forward.[1] The size of the pipeline is emphasised here simply to show that many alternatives to the proposed development are coming forward in less damaging locations and at the scale required to provide the necessary progress towards net zero. The major impediment to progress is the continuing failure of investment decision-making and the construction (of both generation and transmission infrastructure) to match the pace of consenting of onshore wind capacity.

8. The detrimental effect of development on the proposed site (considered in later sections of this response) is sufficiently substantial and significant as to outweigh the benefits claimed for the development. 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 almost all onshore wind development in Scotland, wherever located, now promises these benefits.
    - Ecological enhancement is a mandatory requirement for all development under NPF4 so all proposals now comply. Such enhancement and restoration from previous mismanagement is very welcome but it need not, and should not, be achieved at the expense of impaired visual amenity from a poorly located wind farm. The same enhancement could be provided through a better-located wind farm. It is already taking place elsewhere locally without the necessity of wind farm construction on peat.
    - All wind farm construction and subsequent operations and maintenance generates economic activity. Development in a less harmful location would create just as much economic activity as the proposed development.

[1] At Q1 2026 there was 10.7 GW of onshore wind operational, 2.1GW under construction, 5.9GW consented awaiting construction, and 10.7GW in planning awaiting decision, as well as innumerable scoping proposals. There is some duplication between consented and in-planning capacity where consented projects have a revised application in planning, usually to install taller turbines. Similarly, existing operational capacity should be netted off applications for repowering. These caveats do not undermine the key point: there is a very substantial onshore wind development pipeline and it has been increasing in recent years while the pace of building remains slow. Only in 2017 has more than 1GW ever become operational in a year. Only 639MW became operational in 2024 and a remarkably low 174MW in 2025. (All data from Scottish Government Energy Statistics Hub webpages accessed 20 August 2026).

At a Scottish level these benefits are gained no matter where development takes place. 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. The detriments are site-specific whereas the benefits are not.

9. The *Planning Statement* states incorrectly that *"The Proposed Development is expected to contribute to the 2030 target."* (para 2.7.48). This is inconsistent with the EIAR Chapter Two which states that *"It is anticipated that construction of the Proposed Development would commence in 2030 and would last approximately 24 months."* (Para 2.4.1)

10. There is no requirement in policy, nor is it necessary for addressing the climate emergency, to grant consent to proposals that are not acceptable in planning terms. Mountaineering Scotland submits that the proposed development is not acceptable - the visual detriment from pressing into a virgin area highly valued for its natural attributes outweighs the benefits - and therefore consent should be refused.

Landscape and Visual

a) Preamble

11. Professional landscape and visual assessments have the appearance of objectivity but are ultimately subjective judgements informed by the assessors' values. In Mountaineering Scotland's experience, assessments commissioned by developers typically downplay both the value of potentially affected landscapes and views, and the effect of proposed development upon them. That is certainly the case here. Mountaineering Scotland, representing 'consumers' of mountain and wild landscapes, believes its judgement of effects 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 environment. Hence its main concern in relation to wind farms is adverse effect upon visual amenity and the perceptions of nature, wildness and remoteness that accompany hillwalking activity in areas such as the proposed development area.

b) Assessment

13. It might be questioned why Mountaineering Scotland should object to a proposed wind farm in an area less recognised for mountaineering or hillwalking. The hills in the area are modest in height and navigating the bogs surrounding them is more of a challenge than scaling the hills themselves. But there *are* hills and, more importantly, they offer a distinctive, probably unique, experience for Scottish hillwalkers because of the openness of the gently undulating landscape, with distant views to far hilly horizons. A lack of scale markers means the landscape appears vast beyond its real size and scale. The intrusion of very large turbines into such a landscape changes this experience dramatically.

14. This is a region of sweeping moorland and flows punctuated by lone 'mountains', with a vast sense of space. For the hillwalker, as the EIAR quotes *"The isolated and well-defined hill summits offer a rare vantage point to view the vast extent of the Caithness and Sutherland peatlands punctuated by other lone summits including Ben Alisky, Morven, ..."* (para 4.7.332). This is an experience available at this scale nowhere else in Scotland.

15. The EIAR's Landscape and Visual assessment considers that a large-scale landscape enables turbines to be accommodated because the landscape shrinks the perception of the turbines. Mountaineering Scotland is of the opposite opinion. Very large turbines are perceived as smaller than they actually are and it is the landscape is shrunk to fit that mis-perception.

16. Sletill Hill, bounding the site to the east, is only 280m AOD. The highest altitude turbine proposed would be adjacent to Sletill Hill at c.190m AOD, giving a blade-tip altitude of c.410m AOD. That would be higher than any hilltop between Forsinain and the east coast, the north coast, and >25km to the west. Only in the southern half of the compass would the hills be higher: Ben Griam to the west-southwest, Knockfin Heights to the south, and the Morven group to the south-southeast. This prominence of turbines across a wide area is reflected in the ZTV, with visibility almost total within 10km, substantial to the east, north and northwest beyond 10km, but more fragmented to the west and south because of the hills. Contrary to the EIAR's assertion, and as is plain from the ZTVs, the effects are not 'localised' (para 4.8.11).

17. The EIAR Viewpoints of particular relevance to Mountaineering Scotland's interests (VP 11-14, 19, 20, 22) are, with the exception of VP 22, 'lone summits' offering terrific vantage points both for the uplands further west and south, typically looking away from the proposed development, but also – and most distinctively – looking north or northeast towards the lowlands of Caithness and towards the north Sutherland coast. It is notable that, with the exception of Cnoc Badaireach na Gaoithe, the seven viewpoints of hillwalking interest are within Wild Land (N=5) or Special Landscape Areas (N=5) and most in both (N=4). This indicates the quality of landscape experienced by hillwalkers in the area.

18. The vicinity of the proposed development is an area without wind farms but from the isolated hills there are many in distant view, both operational and under construction, towards Caithness, the Strathy cluster to the northwest, and even Gordonbush to the south. No cumulative ZTV is presented that shows all operational/consented wind farms with Forsinain. Instead, 33 separate cumulative ZTVs are shown for individual or small clusters of wind farms. Reviewing those for the nearest ones suggests that Forsinain WF would reach the parts others don't. As the EIAR rightly points out (Para 4.3.43), ZTVs don't factor in distance and when that is done mentally the pioneer intrusiveness of the proposed development into an unspoilt area becomes even more apparent.

19. The proposed development is not the only proposed wind farm for the Forsinard area and much the same could be written for Woodcock Hill and Baledigle. While mindful that each application has to be considered as presented and on its own merits, the precedent that could be set were any of the three proposals around Forsinard to be consented is deeply worrying. Any single one would result in turbines becoming a prevailing characteristic of views from the lone hills, most damagingly in conjunction with the middle-distance Strathy cluster, and bring development much nearer towards the lone hills rather than the acceptable pattern presently prevailing (with the exception of the Strathy cluster) where turbines are simply distant 'background' features, often very distant but still evident in clear conditions.

20. All three proposed wind farms are keyholed into an area without any statutory or formal landscape or nature protections. That is at least in part because the boundaries of those protections appear to have been deliberately drawn to exclude plantation forestry. If that had not existed (due to the forestry and taxation policy mistakes of the 1970s-1990s) the area of all three would almost certainly have been included within protective designations and, in particular, within the UNESCO Flow Country World Heritage Site. Forsinard Flows NNR and RSPB reserve sit on three sides of the proposed development. Indeed, all three proposed developments are absolutely hemmed in by designations of high (often international)

importance (e.g. RAMSAR, Special Areas of Conservation, World Heritage Site) even though the specific sites lack protection.

21. The recent refusal, already referred to, of the Kirkton Energy Park because of its potential significant adverse effects on the World Heritage Site (WHS) is relevant. Although not directly comparable since it lay partly within the WHS, it shows the fundamental incompatibility of large wind turbines with the WHS designation. Kirkton was at the edge of the WHS. The proposed development (and the other two pre-application proposals) would be deep into its interior. Mountaineering Scotland does not agree with the applicant that *"the area of sweeping moorland and flows that covers the upper Halladale River, including the site area, does not appear as the typical interior of this LCT, but rather has modified characteristics that are more associated with the fringes of the LCT due to landform, topography and influences of development."* (para 4.7.330). A minor interruption between extensive areas of Sweeping Moors and Flows is not the same as an edge transitioning towards a different type of landscape. Even the EIAR has to concede that, seen from above at Ben Griam Beag (VP11), *"Here, due to the elevation of the viewpoint and the angle of the view, this modification is not apparent, and the site appears to lie within a continuous area of interior Sweeping Moorland and Flows."* (ibid). The same is true for all of the viewpoints of concern to Mountaineering Scotland, though the EIAR only mentions it in relation to Viewpoints 11 and 12.

22. The Landscape and Visual summary lists *"intermittent significant effects on views from recreational locations including...Ben Griam Beg (Viewpoint 11), Cnoc Badaireach na Gaoith (Viewpoint 12)"* (Para 4.8.3). The effects at these locations are not 'intermittent' unless the viewer is assumed to be rotating their head constantly.

23. Mountaineering Scotland would suggest that the effects are both greater and significant at more viewpoints than the EIAR concedes. It would suggest that the effect is major at hill Viewpoints out to 15km and moderate and significant at Viewpoints out to 30km. Its rationale for this is that most of the latter viewpoints would see the turbines from the south, front-lit by sunshine and backclothed by dark terrain. This makes moving blades eye-catching, especially in a simple landscape with only much more distant turbines generally (currently) in view. The simple openness of the landscape, which is one of its most characteristic features, would make a tall wind farm, separate from the general pattern of development within the wider area, very much more intrusive than would be the case in a more varied landscape. Development such as that proposed is, in Mountaineering Scotland's opinion, incompatible with the retention of the qualities that make the landscape so valuable and valued.

c) The mountaineering experience

24. The 'mountaineering experience' is a complex phenomenon. Mountaineers (aka hillwalkers in Scotland and particularly in this area) 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 evoked by the physical experience of perceived remoteness and wildness, and engaging with hard terrain. The experience is further enhanced by engagement with nature visually and aurally. The resultant benefits to physical and mental health are now recognised and promoted.

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

26. Mountaineering Scotland undertook a survey in 2016 and repeated the same question in 2023 asking respondents if their actual hill-going behaviour had changed in response to the presence of wind farms. The results were statistically the same for the two years 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 consequently visit less frequently. In contrast, only 2% would go to such an area more often. It would have no impact on 35%. The sum is 99% because of rounding. The surveys did not ask about motivations directly, but the behavioural responses and anecdotal evidence from talking to hillwalkers suggest that they include a strong visual element.

27. The applicant's *Socio-Economics Report* (Section 6) relies on the usual limited evidence base on general tourism to claim that the proposed development would have no impact on tourism and recreation. Yet it contrives to describe the local tourism and recreation baseline without any reference to hills or hillwalking (Section 6.3). There is not even a cross-reference to the Landscape and Visual assessment where the importance of hillwalking at certain Viewpoints is acknowledged. The *Socio-Economics Report* does include in its description of the baseline that *"The RSPB Forsinard Flows reserve is a significant driver for nature-based tourism in the area, attracting visitors to its viewing tower, trails, and educational facilities at the Flows Field Centre. Its operation contributes directly to the local economy through visitor spend ..."* (Para 6.3.9). However, no analysis of potential impact upon visitors from the proposed development is then undertaken, despite the Landscape and Visual assessment rating the visual effect at the viewing tower as Major and Significant. Instead, the *Socio-Economics Report* foregrounds the lack of potential effect upon activities not at all local to the proposed development and with totally different motivations such as the NC500, John O'Groats and surfing. Its conclusion that "*It is not anticipated that there will be any significant negative impact on the tourism industry or recreational assets as a result of the Proposed Development*." (Para 7.2.11) is possible only because of an assessment that wilfully ignores any potential for an adverse behavioural response by a proportion of those visitors attracted to the locality by its landscape and nature.

28. Mountaineering Scotland prefers to rely upon its evidence from hill-goers that there is an effect upon recreation, and this far north from the main Scottish and UK population centres that effect will translate into an overnight tourism impact. To properly assess the level of impact requires a much more careful process than that undertaken by the applicant. Mountaineering Scotland, within its very limited resources, has sought here to provide the decision-maker with more thoughtful evidence, rooted in its consideration of visual effects and knowledge of hillwalkers' response to those effects.

d) Conclusion

29. The above assessment shows that the proposed development would have a significant adverse visual effect upon an extensive area which has a unique 'offer' in terms of hillwalking in Scotland with its long-distance views from isolated hills across extensive barely undulating moors and flows, often to other isolated hills. This effect is inherent in its location and cannot be mitigated.

Overall Conclusion

30. The proposed development is contrary to national policy. Its siting would not 'preserve natural beauty', quite the contrary, it would have a significantly adverse effect upon the visual amenity and overall experience of those visiting the area, particularly by creating a highly visible virgin intrusion into an open landscape famed for its uninterrupted long-distance views. It would represent a significant extension from the established areas of wind farm development in Caithness and north Sutherland.

31. Mountaineering Scotland **objects** to the proposed Forsinain wind farm.

Yours sincerely,



Stuart Younie

CEO, Mountaineering Scotland

access@mountaineering.scot