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Energy Consents Unit
The Scottish Government
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14 May 2025

Dear Sir/Madam

Highland Wind Farm application: April 2025
ECU reference: ECU 00005082

Introduction

1. Highland Wind Farm Ltd has submitted an application for a wind farm of 19 turbines of 200-230m blade-tip height on elevated, peaty moorland between the Strathdearn and the River Dulnain, southwest of Carrbridge.

2. Mountaineering Scotland **objects** to the proposed wind farm development on grounds of (1) visual impact on the nationally significant and extremely popular Munros and Corbetts of the eastern Monadhliath and western Cairngorms and (2) visual impact adversely affecting the wild land qualities of the core interior Monadhliath.

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.

5. Notwithstanding 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. This accords with Mountaineering Scotland's approach to assessing development planning applications, which is to ask 'Is this the right location for this specific proposed development?' In very many cases it is, but not

in all. And not in this case.

6. It is Mountaineering Scotland's view that the location of the proposed Highland WF is not in 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.

7. Highland 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 a high-elevation location. The visual impact and detriment is sufficiently substantial and significant as to outweigh the benefits claimed for the development.

8. 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. Many alternatives to the proposed development are coming forward in less damaging locations.

9. Although the Allt Duine WF refusal in 2015 does not set a precedent, being under a different national planning policy, located a little further east and with much shorter turbines, many of the same arguments still apply in relation to harm to mountaineering interests, to the Cairngorm National Park and to a Wild Land Area. These are expanded upon below.

10. 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. Battery storage is encouraged in NPF4 so almost all wind proposals now include a small level of battery storage, as here. All construction generates 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[1], not on every proposed individual project being consented.

11. There is no requirement in policy, nor is is necessary for addressing the climate emergency, to consent development proposals that are not acceptable in planning terms. Mountaineering Scotland submits that the proposed Highland WF development is not acceptable in planning terms - the visual detriment outweighs the benefits - and therefore consent should be refused.

4 Landscape and Visual Impact

a) Preamble

12. 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 we use words in their ordinary English meaning,

[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 which has been increasing in recent years.

not as landscape architects might use them.

13. 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. Mountaineering Scotland is grateful to the applicant for adopting its suggestion of a viewpoint at Carn Dearg.

14. The baseline photography was taken in a range of atmospheric conditions. Some 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.

b) Assessment

15. The proposed development site itself is of limited mountaineering interest. The terrain, although gently undulating, is often deep peat, wet and with rough vegetation, making for hard going Mountaineering Scotland's substantive interest is the views to the site from elevated locations in all directions but predominantly the southern half of the compass. Because of the perceived wild and remote nature of the Monadhliath interior, there is also mountaineering interest in the quiet deep glens such as the Dulnain and Strathdearn.

16. The site itself is undesignated, though it is within the Monadhliath Wild Land Area (WLA). Many of the locations of mountaineering interest around the site lie within nationally defined landscapes recognised for their quality: the Cairngorm National Park (CNP), and within that the higher quality Cairngorm National Scenic Area (NSA), and the Monadhliath WLA. (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.)

17. The table below assesses daylight impacts for those Viewpoints relevant to Mountaineering Scotland's interests. The access track in Strathspey has not been considered. Where Mountaineering Scotland disagrees with the LVIA assessment this is highlighted in bold.

Viewpoint (nearest turbine)		**EIAR assessment**	**Mountaineering Scotland assessment**
North			
1	Carn Glas Choire (18km)	Minor, not significant	Disagree: **moderate, significant**.. Although moderated by distance the impact is more substantial than the LVIA allows. Highland WF would appear at high altitude in a different area and landscape context from existing development. (If Clune were consented the impact would reduce and become non-significant.)
Eastern Monadhliath			
3	Geal-charn Mor (7km)	Major, significant	Agree. Highland WF would be a prominent intrusion into the scene compared with the diminutive appearance of operational wind farms. The majority of hub altitudes would be around the summit height of this 824m Corbett. The visualisation diminishes the impact since snow cover on-site and as the distant backdrop is ideal camouflage for pale turbines. (Oddly, the LVIA makes no mention of Clune for this Viewpoint.)
11	Carn Sgulain (10km)	Moderate, significant	Disagree: **major, significant**. Highland WF would appear alone in a different part of the landscape and context from existing development. The

			highest blade-tips would be only c,10m lower than the summit of this 920m Munro. There would be a similar impact upon the neighbouring Munro of A'Chailleach and Corbett of Carn an Fhreiceadain.
10	River Dulnain (southern bridge crossing) (3km)	Major, significant	Agree. The experience of the quiet interior glens is an important element of the mountaineering experience available in the Monadhliath despite their scarring by vehicle tracks and, in places, angular fenced tree planting. The WLA assessment Viewpoints 1-3 also show the detrimental impact of the proposed development upon the relatively untouched interior.
18	Estate Track nr R Dulnain (3km)	Major, significant	
Cairngorms / east of Strathspey			
4	Meall a'Bhuachaille (22km)	Minor, not significant	Disagree: **moderate, significant**. While distance moderates the impact, Highland WF would be a prominent intrusion compared with the diminutive appearance of operational wind farms.
19	Craiggowrie (19km)	n/a	Complementary to VP4, the wireline and ZTV show that Highland WF would be a prominent feature throughout the popular high-level walk between Meall a'Bhuachaille and Craiggowrie.
5	Cairngorm (Funicular Railway) (26km)	Minor, not significant	Disagree (except for Sgor Gaoith): **moderate, significant**. While distance would have a distinct moderating effect, Highland WF would nonetheless appear in clear conditions as a prominent, high-altitude intrusion compared with the diminutive appearance of more distant operational wind farms. It would appear alone in a different area and landscape context from existing development. It would be in view for much of the extremely popular high-level walk between Cairngorm and Ben Macdui by Cairn Lochan and the rim of the Northern Corries; for much of the usual approach to Braeriach from the Lairig Ghru; and from the usual approach to Sgor Gaoith from Carn Ban More.
6	Ben Macdui (27km)	Minor, not significant	
7	Braeriach (23km)	Minor, not significant	
8	Sgor Gaoith (20km)	Moderate, significant	
16	Carn Dearg Mor (23km)	Minor, not significant	
Western Monadhliath			
12	Calpa Mor (8km)	Moderate, significant	Disagree: **major, significant**. The viewpoint is slightly NE of the highest point, which makes no difference to the view towards the proposed development but does provide topographic screening to Corriegarth/Corriegarth 2 and Stronelairg/Cloiche thus underplaying the sense of encirclement that Highland WF would create by occupying a new quarter of the view in relatively close proximity to the viewer.
13	Carn na Saobhaidhe (15km)	Moderate, significant	Agree. Although the viewpoint is already badly affected by existing wind farms, notably Corriegarth and consented Corriegarth 2, Highland WF would appear in a different direction from existing development and at high altitude in a very different landscape context – in the interior of the Monadhliath rather than at the edges.
14	Strathdearn (4km)	Major, significant	Agree. This quiet interior glen is maintained for nature and even a small number of turbines towering over the glen is simply incompatible with maintaining its sense of seclusion.

15	Beinn Bhreac Mhor (8km)	Moderate, significant	Disagree: **major, significant**. Although the viewpoint is already badly affected by existing wind farms, and this will intensify if Carn na Saobhaidh (Aberarder Extension) is consented, Highland WF would appear in a different direction from existing development and at high altitude in a very different landscape context – in the interior of the Monadhliath rather than at the edges. The cloudy baseline photography obscures the main Cairngorm plateau which would be in direct line of sight over Highland WF from Beinn Bhreac Mhor.

18. The proposed development would form a new focal point in the landscape, clearly visible and prominent because of its high altitude. This is reflected in the relatively wide spread of significant effects on landscape character, which the LVIA judges to extend out out to 8km E and W (Major) and out to 10km N and 15 km W (moderate) (LVIA Table 6.10). This is notably further from the proposed development than is usually the case for proposed onshore wind developments in Mountaineering Scotland's experience.

19. The size of the turbines and their hill-top location contributes to their prominence and visual overwhelming of the gentle topography of the modest hill-top ridge around which they are sited. The highest natural point within the turbine area is 722m AOD. The turbine bases would be at approximately 620-710m AOD with ten turbine bases at or above 680m OD, giving tip heights of 880m up to 910m OD (hubs c.800-830m OD). The majority of the turbines would thus rise above the Corbetts roughly 6km to the east (Geal-charn Mor, 824m) and south (Carn an Fhreiceadan, 878m). They would in fact be higher at blade-tip than any part of the Monadhliath outwith the Munros in the southeast, which are only modestly higher at 920-945m OD. In the experience of Mountaineering Scotland the larger turbines now being introduced, and proposed here, are more overtly visible at greater distances than the previously generation of typically 125-150m blade-tip turbines.[2]

20. The LVIA recognises that "The Proposed Development will be located within the central area of the upland plateau of the Monadhliath ...[and] under scenario 3 (which includes scoping stage schemes) the Proposed Development will be seen in the context of a larger number of wind farms, contained within the upland plateau of the Monadhliath." (para 6.9.5, added emphasis) However this assessment lacks nuance. To refer simply to the 'upland plateau' oversimplifies a more complex topography of deep valleys (Strathdearn, Dulnain), incised tributaries and steep-sided, round-topped hills. But, more importantly, most other wind farms, actual or proposed, are not "contained within" the central upland. Only the recent application for Clune could be argued to fit this description with all others being located on the fringes. It is incorrect and misleading for the LVIA to state that the existing pattern is of " wind farms located in the central plateau of the Monadhliath". That is emphatically not the pattern. Thus the proposed development does not follow " this general wider pattern of existing wind farm development". (Table 6.28, criterion 6) It breaks the actual wider pattern.

21. The developing wind farm landscape surrounding the core Monadliath has thus far been largely confined to the edges, even the harmful Stronelairg/Cloiche/Dell cluster. There is now pressure from developers to place wind farms much closer to the core area. Mountaineering Scotland defines this core area as roughly coinciding with the WLA and across Strath Dearn to its east-facing slopes. Development within this core area would eliminate it as a tranquil haven. It is already adversely influenced by wind farms but, mostly, at a distance and often with some topographic screening with the majority of the turbines being on distal slopes. Certainly they are generally at a much greater distance and in less intrusive locations relative to the core area than would be Highland WF. The WLA assessment (Technical Appendix 6.3) confirms that the northern half of the WLA would experience major adverse effects within 5km, with moderate impact extending to 10km. Adding this on top of the impact from existing and consented development around the Monadhliath, it is Mountaineering Scotland's view that Highland WF, if consented, would eliminate

[2] Considering the Monadhliath wind farms included in the LVIA Table 6.7: six operational/under construction have an average turbine height of 125m BTH; two consented 150m; and six application/scoping 200m.

the WLA as a Wild Land Area. Only fragmented pockets of wildness would remain.

22. It is acknowledged that the proposed Clune WF (at Scoping in the LVIA, now an application[3]) and possibly Aberarder Extension (Scoping) would also have an adverse impact by spreading development onto slopes and hills facing into the Monadhliath rather than facing away as most currently do. But the impact of Highland WF would be worse than either of these proposals.

23. The LVIA refers multiple times to Highland WF being seen in the context of existing wind farms, notably Dunmaglass and Aberarder and sometimes Farr/Glen Kyllachy. This is misleading: these are 10km more distant to the west and north. Wind farms are certainly recurring elements of the view for walkers in the Monadhliath, both in succession and in combination – as is evident from the cumulative ZTVs in the application – but typically only a limited number of turbines are in view at any one time from the core area and where larger numbers are in view they tend to be at greater distances. There is also relief to be gained because current development is focussed in the western half of the view, leaving eastward and southward views open. Highland WF, if consented, would single-handedly change that to such a substantial degree that it would eliminate much of the mountaineering interest within the core Monadhliath. It would be 'in your face' looking west from Strathdearn's east-facing slopes, looking west from the CNP boundary Corbetts and north from the CNP boundary Munros. It would not " slightly increase the existing attrition of the 'vastness of space, scale and height' experienced in outward views north-west from hill summits in the north-west of the CNP" (Appendix 6.4, p.11). It would very substantially do so.

24. Its visual impact would also penetrate far into the interior core of the WLA and upper Strathdearn very much more intrusively than any other single current or proposed scheme. Put simply, if emotively, Highland WF not only strikes at the heart of the Monadhliath but at its soul.

25. It would also alter how the Monadhliath are perceived from further away. By bringing wind farm development into the core, much closer to the viewer and at high altitude with tall turbines, the perception would become of just another high moorland with wind turbines (of which there are many locally and across Scotland) rather than of an area with a distinct, albeit subdued, distinct character. It would be perceived as 'developed' rather than 'wild'. If the many other wind farms distantly in view are seen as the choir, Highland would be the soloist standing front and centre of stage. As a more minor point, the LVIA assessment for the high Cairngorm viewpoints refers several times to Highland WF as " of comparable distance to the viewpoint as the larger wind farm group to the east, which would include the scoping stage Clune Wind Farm." With the exception of Clune, the northeast wind farms are further away, often markedly so.

c) Mountaineering Experience

26. 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. 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 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.

27. 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

[3] Mountaineering Scotland gave strong consideration to objecting to the recent Clune WF application and only narrowly decided not to, in part because of organisational resource considerations but primarily because of its greater distance from the main areas of mountaineering interest in the Munros and Corbetts of the eastern Monadhliath and to the core Monadhliath (for example, it is twice as far from Calpa Mor as would be Highland WF). Clune would be markedly adverse for mountaineering interest in the Monadhliath but not fatal as Highland WF would be.

motivations of mountaineers (or any other countryside users) either in general or with regard to a specific route or area.

28. 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 displaced from areas with wind farms to areas without.

29. 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. Such empirical data directly contradicts the unevidenced suppositions on motivations and impact in the Socio-Economic Impact Assessment

d) Conclusion

30. The above assessment shows that the proposed wind farm would have a significant adverse visual impact upon the popular hills in the surrounding area and upon the quiet enjoyment of the the remaining wild and remote core of the Monadhliath. It would represent a significant movement of development from the edge to the interior of the Monadhliath – a move that would substantially magnify the cumulative impact of wind farms upon the Monadhliath.

Conclusion

31. The proposed development is contrary to national policy (NPF4). Its siting would not 'preserve natural beauty' nor be localised. It would have a significantly adverse impact upon the visual amenity and overall experience of those visiting the Munros, Corbetts and other popular hills around the proposed hill-top site. It would extend very considerably the presence of wind farms from the edges to the interior of the Monadhliath, a highly significant movement.

32. Mountaineering Scotland **objects** to the proposed Highland wind farm.

Yours sincerely

Stuart Younie

CEO, Mountaineering Scotland