

By email to: Econsents_Admin@gov.scot

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

31st August 2026

Dear Sir/Madam,

Re: Application for the proposed Invercassley Wind Farm ECU00006064

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. Fred Olsen Renewables has submitted an application for a wind farm of 20 turbines - 18 of 230m BTH and 2 of 200m BTH - on the north side of Strathoykel, west of Glen Cassley.

3. Mountaineering Scotland **objects** to the proposed development on grounds of visual impact on areas of mountaineering interest.

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. It is, however, the sector as a whole to which strategic significance attaches, not to any individual proposal.

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 an assessment of visual impact upon mountaineering assets and interests. 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 applicant's *Planning and Renewable Energy Statement* refers *inter alia* to the recent Culachy wind farm decision as showing that Scottish Ministers are "*clear that the serious nature of climate change, its potential effects and the need to cut carbon emissions are a priority for them.*" (para 4.18) without making it clear that Culachy was nonetheless refused. The climate/carbon priority is not to be read as a trump card in decision-making.

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 rapid progress towards net zero. A major blockage is the failure of investment decision-making and the construction industry (for both generation and transmission infrastructure) to keep up with even the modest pace at which onshore wind capacity is being consented.

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, promises these benefits.

- Ecological enhancement is a mandatory requirement for all development under NPF4 so all proposals now comply. Such enhancement and restoration from years of mismanagement is very welcome but it need not, and should not, be achieved at the expense of severely impaired visual amenity from a poorly located wind farm. The same enhancement would be on offer from a better-located wind farm. The applicant's *Planning and Renewable Energy Statement* states: "*It is clear that this enhancement will not take place without the Proposed*

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 pre-planning 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, where an application is for repowering the existing operational capacity should be netted off the application capacity. These caveats do not undermine the key point: there is a very substantial 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).

Development being undertaken." (para 6.8). It is taking place elsewhere in Scotland without accompanying wind farm construction on deep peat. If that would not be the case here, it would be because the landowner chooses to allow continued degradation.

- All wind farm construction and subsequent operation and maintenance generates economic activity. Development in a less harmful location would create just as much economic activity as the proposed development.

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. There are two minor points of error in the applicant's *Planning and Renewable Energy Statement*. First, paragraph 5.71 is nonsense. The same error is repeated at paragraph 6.4. The correct figures – in years not CO² - are given in Chapter 13, Table 13-5. Second, the brief reference to the proposed development storing electricity (para 6.11) is incorrect since the small BESS element was removed prior to the application being submitted.

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 pressing into remote and wild areas outweighs the benefits - and therefore consent should be refused.

Landscape and Visual Impact

Preamble

11. For all their appearance of objectivity, professional landscape and visual impact assessments are ultimately subjective judgements informed by the assessors' values. In Mountaineering Scotland's experience, assessments commissioned by developers typically downplay the impact of proposed development upon the mountaineering experience. That is certainly the case here. Mountaineering Scotland, with an experienced assessment team composed of, informed by and representing 'consumers' of mountain landscapes and their values, 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. Hence its main concern in relation to wind farms is adverse impact upon visual amenity and the perceptions of nature, wildness and remoteness that accompany mountaineering activity in areas such as the proposed development area.

Assessment

13. Mountaineering Scotland's primary concern in relation to the proposed development is the visibility of the site from surrounding hills, and some glens, arising from a combination of its openness and the height and altitude of the turbines.

14. The highest turbine base would be c.410m OD (with 7 in total around 400m altitude; cf adjacent wind farm application Allt an Tuir's highest base at 300m OD). Multiple turbine blades would reach c.630m OD and hubs c.550m OD (the two shorter turbines are not the highest altitude). The adjacent Beinn an Eoin is the highest hill in this block of upland at only 544m OD. The proposed development would be prominent, with open views:

- To the south, Carn a' Choin Deirg, Seana Bhraigh, but also well down into glens aligned to the wind farm, notably Glen Einig-Strath Mulzie where the LVIA predicts a Moderate-major Significant effect on the Cape Wrath Trail,
- To the west, Assynt hills, and
- To the north (e.g. Ben Hope) and south (e.g. An Teallach), though these more distant impacts are at distances disregarded in planning decisions (e.g. 35-40km).

15. The *Design and Access Statement* description of the site states, "*The landscape is characterised by the enclosing hill slopes formed by Beinn an Eoin Bheag, Beinn an Eoin and Beinn Rosail ...*" (p.10). This is true when standing at human height by the Tutim Burn but placing 230m high turbines at 400m altitude OD breaks the confines of the enclosing slopes, making the turbines by far the highest and most eye-catching features across a large area. The proposed development is not, contrary to the applicant's assertion, "*contained by adjacent topography*" (*ibid* p.11).

16. The wider area around Lairg and Strath Oykel is already host to a number of wind farms, several more consented developments and many more concurrent applications and scopings. Within the wider Lairg-Oykel area there are 63 turbines currently operational with a mean blade-tip height of 106m, 93 consented averaging 171m, and 91 in planning (not including Achany Variation) averaging 210m. In addition, there are in Mountaineering Scotland's files three scopings within 20km of the proposed development for 91 turbines averaging 218m, though application layouts would be much fewer than this number. Clearly the future Lairg-Oykel landscape will be one characterised by large wind turbines, almost certainly sufficiently ubiquitous to constitute a wind farm landscape.

17. In part this speculative activity simplifies the assessment of the impact of the proposed development but it also complicates it.

18. It simplifies it because views to the proposed development from directly north through east to directly south would be through operational, consented or, to the south, application/scoping wind farms at least some of which are likely to be consented. Even if the Coille Beith application, directly south, is excluded, views from 0 to 160° would still be through consented wind farms. Thus, Mountaineering Scotland's assessment of visual impact can be simplified by focussing on the western half of the compass.

19. It complicates it because what the area will eventually look like is unknowable. If all current proposals at application and scoping stages were to be consented, the proposed development would simply be one set of turbines amongst a wind farm landscape, with its individual impact indistinguishable from the mass, but if other schemes do not proceed, Invercassley alone would be a prominent, exposed 'landmark' extending out from the southwestern corner of the Lairg-Oykel wind

farm landscape. It is on this latter basis that Mountaineering Scotland has undertaken its assessment, but it is recognised that this is by no means an assured basis.

20. The effect of successive waves of development is well seen in the sequence of ZTVs at Figure 6.25, 6.27 and 6.29 where the solus visibility of the proposed development steadily diminishes as successive developments are added in. One has to be wary in interpreting this, though. ZTVs show only theoretical visibility and even when that is actual, as it invariably is from unscreened upland locations, takes no account of proximity and prominence. Visibility low on the horizon at 30 km is quite different from a near hill-top position at 15km even though both appear the same on the ZTV.

21. The development activity in this area is such that even applications such as the present one are incomplete, with two scopings submitted for sites further west (neither of which referenced the other) after the cut-off date for the cumulative sites included. Mountaineering Scotland's understanding of the current position around Strath Oykel within 10km of the proposed development is tabulated below, from northeast anticlockwise to south east.

Operational Achany and Rosehall wind farms - 38 turbines of 90-100m BTH
Consented Achany Extension (18 x 149.9m BTH) and application 'variation' (18 x 200m BTH)
Application Allt an Tuir (9 x 180-200m BTH)
Application Invercassley (20 x 200-230m BTH)
Scoping Fionn (29 x 230-50m BTH)
Scoping Ruith Cnoc (42 x 220m BTH) west from Fionn on the SW side of the strath
Application Coille Beith (11 x 200m BTH)
Application Strath Oykel (11 x 200m BTH) Previous consent overturned by the Court of Session) and now being reconsidered by Scottish Government.
Application Inveroykel (20x 200-230 BTH) Scoping at the proposed development cut-off date

22. The proposed development is sited within the Reay-Cassley Wild Land Area and in proximity to the Rhiddoroch-Beinn Dearg-Ben Wyvis and Inverpolly-Canisp Wild Land Areas and to the Assynt-Coigach National Scenic Area. These designations show the quality of landscape in the western half of the compass from the proposed development. For the avoidance of doubt, Mountaineering Scotland's assessment is of impact upon the visual amenity experienced in mountain landscapes and the quality of mountaineering experience. It does not consider impacts on the qualities of designated or defined areas as resources in their own right.

23. The table below assesses the visual impact at the specific Viewpoints most relevant to mountaineering interests. A number of general points are made first in the following two paragraphs.

24. Mountaineering Scotland does not agree with the LVIA statement that, *"It was determined that there was no potential for the Proposed Development to result in any significant visual effects at distances over 20km from the Site as with increased distance from the Site, the likelihood of significant visual effects occurring incrementally decreases."* (Para 6.87). Distance is not the only consideration; prominence, intrusiveness, context and perception are also factors. Some longer-distance views from the south and west would be of turbines front-lit by the sun against a dark terrain backcloth, maximising visibility at distance. The LVIA repeatedly refers to turbines being backclothed by terrain in a way that implies the assessor considers conspicuity is thereby reduced. In the experience of Mountaineering Scotland's assessors backclothing of pale turbines against dark terrain often increases conspicuousness.

25. The scale of very large turbines tends to be misperceived (i.e. they are perceived as smaller than they actually are) and the landscape's scale and sense of space shrunk mentally by the viewer to match this misperception.

Viewpoint (distance from nearest turbine)		LVIA assessment (‘worst’ cumulative shown if different from solus)	Mountaineering Scotland assessment
15	Cnoc Bad a' Choille (7.7km)	Moderate Significant	The LVIA very substantially understates the effect. The proposed development stands prominently uncontained, thrust forward from the current cluster of development (including consented and application sites). By altitude and turbine height it dominates the landscape.
16	Ben More Assynt (15km)	Moderate Significant	The LVIA understates the effect. While seen against a backdrop of turbines, in a direction increasingly characterised by turbines, the proposed development would be perceived as a significant step closer to the mountains. The view along the hill's south ridge draws the eye to the proposed development. The scale of the kinetic turbines overcomes minimal topographic screening to change a simple uncluttered landscape of smooth slopes into something more ragged and eye-catching. The proposed development would be twinned across Glen Cassley with Achany Extension, especially the variation application 200m turbines, framing the view down the glen with tall turbines.
17	Cul Mor (23km)	Minor moderate Not significant	The LVIA substantially understates the effect. Notwithstanding the distance, the turbines would be very eye-catching because of the openness of the site and the turbines' altitude and size. The combination of backclothed and skylined turbines would maximise visibility across a range of weather conditions. Even against all the other extant and proposed schemes, the

			proposed development would be seen as a significant step towards Assynt with no sense of natural boundary. As a comparison, note how Strath Oykel and Coille Beithe Wind farms' turbines appear to lie within and on the far side of a valley 'boundary', posing less 'threat' of encroaching towards Assynt.
19	Carn a' Choin Deirg (12km)	Moderate Significant Cumulative – Major moderate Significant	The LVIA substantially understates the effect. In a landscape studded by wind farms, the proposed development would nonetheless be prominent because of the openness of the site and the turbines' altitude and size, and by virtue of it fronting views of hills to the north, notably Ben Hee. The combined effect with Coille Beith (application site) would be even more severely adverse but the siting of Coille Beith means that even though it would be closer to the viewer (at c.5km), it would sit lower and intrude less into the magnificent distant view: Invercassley would have the greater adverse effect.
20	Seana Bhraigh (21km)	Minor moderate Not significant	The LVIA substantially understates the effect. Although distance gives some moderation of effect, as does baseline photography in cloud-dulled conditions, the proposed development would appear prominent because of the openness of the site, the turbines' altitude and size, and its apparent thrust forward from the current cluster of development, including consented and application sites. Other proposed developments sit lower in the landscape, are more distant, and/or have a more varied interplay with the topography than the total exposure of Invercassley.
21	Beinn Leoid (24km)	Minor moderate Not significant Cumulative – Moderate Significant	The LVIA judgement is fair. From this angle the proposed development would merge into the emerging wind farm landscape in the wider Lairg-Shin area, with the isolated consented Sallachy appearing the most intrusive of the wide swathe of wind farms in view.
22	Suilven (26km)	Minor moderate / Minor Not significant	The LVIA understates the effect. Despite the distance, the alignment of the proposed development with the eastern ridge of Suilven is particularly unfortunate, ensuring the viewer's attention is focussed towards it. No other extant or proposed development matches this alignment.

26. Since NPF4 introduced the idea of localised visual impacts being acceptable, without defining 'localised', almost all wind farm applications have found that the impacts would be localised. That is claimed here and, as the ZTV shows, under no reasonable definition of 'localised' could that be considered to be true. Nor, on an inappropriate site, can design mitigation hide large kinetic structures which, by their very purpose, require to be open to the wind and thus to view.

The mountaineering experience

27. 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 evoked 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.

28. 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 simply of general, typically road-based, tourism – suggests that some activity is being displaced from areas with wind farms to areas without.

29. 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, 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 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.

30. These statistics should be of concern to an area where, as the Socio-Economic Impact Assessment (p.17) states, *"Within a 15km radius of the Proposed Development, the tourism offering is found to be dominated by outdoor attractions, including hillwalking routes, scenic viewpoints, ..."*. However, the applicant appears to regard it as acceptable to then conclude there would be no impact on recreation from *"desk-based information sources ... professional judgement based on previous experience [and] No site visit ..."* (EIAR Chapter 13, paras13.95-96).

31. Starting from a position that there is universally no impact from Scottish wind farms upon recreation and tourism, the EIAR goes through a circular exercise to conclude that the proposed development would have no impact. Perhaps it is this mindset that enables the assessors to regard Ben More Assynt – a national mountaineering jewel – as of *"local importance"* and *"low sensitivity"* (paras 13.112-115). Likewise, the long-distance Cape Wrath Trail is *"important at a local level only"*

(paras 13.119-120). Such ill-informed judgements raise doubts as to the competence of the assessors to objectively consider recreational impacts, at least in respect of mountaineering.

32. Mountaineering Scotland prefers to rely upon its evidence from mountain-goers that there is an impact upon recreation, and this far north from the main Scottish and UK population centres that impact will translate into an overnight tourism effect. To properly assess the level of impact requires a much more careful and fieldwork-informed process than undertaken by the applicant. Mountaineering Scotland, within its very limited resources, has sought here to provide the decision-maker with better evidence, primarily through its assessment of visual impact as mountain-goers would perceive it.

Conclusion

33. The above assessment shows that the proposed development would have a significant adverse visual impact upon an extensive area famed for high-quality hillwalking and mountaineering. This impact is inherent in its location and cannot be mitigated.

Legal Matters

34. The applicant seeks to obtain consent (or conditioned consent) without being able to give any information on the grid connection. Since the two elements - wind farm and grid connection – are totally functionally interdependent, because neither has any purpose without the other, it is Mountaineering Scotland's view that they constitute a single project and should be treated by the decision-maker as such. Until all the elements can be assessed together, no individual part should be granted consent to proceed.

Overall Conclusion

35. The proposed development is contrary to national policy. 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 sometimes glens, of Assynt and central Sutherland and represent a significant extension of the established area of wind farm development around Lairg and Strath Oykel.

36. Mountaineering Scotland **objects** to the proposed Invercassley wind farm.

Yours sincerely,



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