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10th March 2026

Dear Sir/Madam,

Re: Application for the proposed Creachan Wind Farm

ECU00005211

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

1. RWE Renewables UK Onshore Wind Ltd has submitted an application for a wind farm of 13 turbines, 9 of 200m BTH and 4 of 180m BTH, on high moorland 1.6km SE of Carn Chuinneag (a Corbett) in Easter Ross.

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

Mountaineering Scotland

3. Mountaineering Scotland is a membership organisation with 16,000 members and is the only recognised representative body for hill walkers, climbers, mountaineers and ski-tourers who live in Scotland and/or 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.

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. It is also acknowledged that the refusal of Glen Morie Wind Farm in 2014 took place under a more balanced national planning policy prior to the implementation of NPF4, which is favourable to onshore wind farm developer interests.

6. 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.

7. 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. Not every proposed onshore wind farm is mission-critical for the achievement of national policy goals given the context of substantial unbuilt consented capacity, a steady stream of new proposals seeking consent, and an equally large stream of pre-planning (Scoping) proposals coming forward.[1] Many alternatives to the proposed Creachan development are coming forward in less damaging locations and at the scale required to provide rapid progress towards net zero if developers and the construction industry can keep pace. The renewables industry argues that faster consenting is key to meeting onshore wind targets but the data suggests that the real bottlenecks are slow post-consent investment decision-making and construction. The urgency of taking action on climate change, stressed so much in S.36 applications, seems to drop down developers' priorities once consent has been obtained. Mountaineering Scotland has observed, however, that very little consented onshore capacity has not eventually been built even though sometimes only many years after consenting.

[1] At Q3 2025 there was 2.0GW of onshore wind under construction, 5.6GW consented awaiting construction, and 10.4GW 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 but government statistics do not do that. Notwithstanding these caveats, on any reading there is a very substantial development pipeline and it has been increasing in recent years while the pace of building remains low. Only 2017 has ever exceeded 1GW becoming operational in a year. In 2024 only 700MW became operational and a remarkably low 139MW in the first three quarters of 2025. (All data from Scottish Government Energy Statistics Hub webpages accessed 18 Feb 2025).

8. The detrimental effect of development on the proposed site 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 delivers these benefits.

    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 severely impaired visual amenity from a poorly located wind farm.

    b. Many wind farm applications include a small amount of battery storage which, as here, is modest 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 demonstrably 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 development is not acceptable in planning terms - the visual detriment to a remote and wild 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 repeatedly downplay the impact of proposed development upon the mountaineering experience. That is certainly the case here. 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.

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.

Assessment

13. Mountaineering Scotland's interest in this application is triggered both by the close proximity of the proposed development to the isolated, distinctively twin-peaked Corbett of Carn Chuinneag and by its visual impact on the uplands to its west and southwest. The Rhidorroch-Ben Dearg-Ben Wyvis WLA, within which the majority of the Main Development Area is located, including around two-thirds of the turbines, extensive roads and the battery containers, is an important indicator of a landscape with many characteristics important for the quality of mountaineering experience. The superimposition of the Fannichs, Beinn Dearg and Glencalvie SLA and the Ben Wyvis SLA on extensive areas of the WLA are a further indicator of landscape quality. For the avoidance of doubt, Mountaineering Scotland's assessment is concerned with 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.

14. Carn Chuinneag is described thus in the Scottish Mountaineering Club Guide to the Corbetts (2025 edition, p.328): "With its distinctive twin tops, *Carn Chuinneag enjoys an isolated position among the rolling hills and deer forests of Easter Ross.*" Alan Dawson in his (2021) *The 1033 High Hills of Britain* notes that "*The twin tops of Carn Chuinneag form a prominent landmark over a wide area of north-east Scotland.*". The positioning of tall turbines high on one flank of Carn Chuinneag would, particularly in views from (broadly) the southwest quadrant, reduce it to just another hill with adjacent turbines. The altitude and size of the turbines, and from some viewpoints a mix of skylining and backclothing, would markedly diminish both its distinctiveness and sense of isolation. The latter is a diminishing resource in Scotland's mountains as highly visible development spreads over more and more of the uplands.

15. Easter Ross is not without the presence of wind farms, as Figure 6.12 shows. Nor is it without pressure for more development, as the many Scoping sites shown on Figure 6.11 demonstrate. Of particular note are pre-planning Glasa and Beinn Tharsuinn Repower and Western Extension. Taken together with Creachan these three proposals would result in 60 turbines of 180-250m blade-tip height across an extensive area, effectively visually 'dewilding' as much as one third of the WLA. As already noted, Mountaineering Scotland accepts the need for low-carbon electricity generation and does not oppose many proposals, including many in Easter Ross (such as the applicant's potentially larger Ceislein scheme in pre-planning), even though they nibble away at the quality of Scotland's upland landscape. However, the level of damage that would be caused by Creachan would not be a nibble but a significant bite into an area of high-quality mountaineering. If combined with Glasa and Beinn Tharsuinn Western Extension it would be an enormous bite. Creachan alone, which is necessarily the concern of this objection, would significantly intensify and extend the influence of wind turbines into the wild, rugged interior of Easter Ross.

16. The proposed development does not respect the current pattern of wind farm development. There are operational and consented wind farms in a large crescent around the proposed development, from the Strath Oykel cluster in the NW clockwise to the Lochluichart-Corriemoille-Kirkan cluster to the SW. The proposed development would be a significant advance into the turbine-free area inside this crescent. Creachan would resemble a finger poking into the WLA. In this it mirrors the refused Glenmorie proposal which took the same shape but with a broader turbine area.

17. The ZTV is complex, reflecting the intricate topography of deep glens separated by hill ridges within the wider area. There is inevitably an area of high visibility immediately around the proposed development and on proximal facing slopes. There is then a zone of more limited visibility with screening from the local hills around the site, though with clear visibility where there are gaps in these hills. For example, compare Viewpoint 4, where the development is in clear view with movement ensuring it would compete successfully against Carn Chuinneag for the viewer's attention, and Viewpoint 5 where it is barely visible above much more eye-catching foreground clutter. Beyond this semi-screened zone, more widespread visibility is re-established from locations at distances typically in excess of 20km. At these distances, the views to the site from the NW and SE would often have intervening wind farms in view. Views from the NE would have wind farms in view but not directly intervening; however mountaineering interest in this direction is limited. The key direction for assessing visual impact on mountaineering is therefore the southwest quadrant (broadly defined).

18. The table below assesses the visual impact at the specific Viewpoints relevant to Mountaineering Scotland's interests. Relevant across the Viewpoints is the altitude of the proposed development. The turbine base altitudes range from c.430-580m OD, giving blade-tip altitudes of c.630-780m OD. The highest turbine's blade-tips would be only 60m below and within 1600m distance of the summit of Carn Chuinneag (838m OD).

Viewpoint (nearest turbine)		**LVIA assessment**	**Mountaineering Scotland assessment**
1	Carn Chuinneag (1.6 km)	Major adverse, significant (solus and cumulative)	**Agreed**. The impact on Carn Chuinneag would be very substantial with almost all the turbines seen from this prominent vantage point at full tower height together with much of the roadways and other infrastructure. It is acknowledged that the main route to the Corbett is from the north, from which Creachan would not be seen, but it is also approached from Strath Rusdale and the Braeantra-Glen Calvie Right of Way is also an important cross-country route in its own right, running alongside the proposed development unscreened for about 4km. Even though multiple wind farms would be in the same angle of view as Creachan, they are more distant and

			neither individually nor cumulatively (excluding those in pre-planning) would they have the same devastating visual impact – or as the Viewpoint Assessment puts it "pronounced additional change" (TA6.6 p.36). Wind farms in other angles of view considered in the three scenarios of the LVIA would be at least as distant, mostly notably more distant then operational schemes, and in areas clearly seen as peripheral to the wilder uplands, unlike the proposed development site.
6	Beinn a' Chaisteil (13km)	Moderate adverse, significant (solus and cumulative)	Both solus and cumulative assessments **underplay** the significant intrusion into high wild country that Creachan would represent. Almost all turbines would be visible to at least hub height and around half with at least partial towers visible. There would be a mix of skylining and backclothing. The view shows starkly how Carn Chuinneag would be reduced to just another hill with adjacent turbines rather than a magnificent double-peaked giant. The altitude and size of the turbines are key contributors to this perception. Similarly to Carn Chuinneag, other wind farms considered in the three scenarios of the LVIA would be more distant, in areas clearly seen as peripheral to, or even outwith, the wilder uplands. The addition of Creachan would not add 'marginally' to the influence of operational wind turbines or be only 'a notable additional change', as the Viewpoint Assessment claims (TA6.6 p.17, p.39). It would be a substantial and pronounced change. Furthermore, Creachan would be seen at 90° to the view to the Lochluichart-Corriemoillie-Kirkan cluster, increasing the impression of wind farms pressing in upon the core uplands from multiple directions rather than, as now, being peripheral.
11	Carn Ban South Top* (17 km) * The name is taken from Dawson's *The 1033 High Hills of Britain* (p.61)	Minor adverse, not significant Cumulative: negligible adverse, not significant	Both solus and cumulative assessments **underplay** the significant intrusion into high wild country that Creachan would represent. Most of the Creachan turbines would be hidden by Carn Chuinneag but the few that are are visible would serve to reduce Carn Chuinneag to just another hill flanked by turbines. It is notable that only 3.5km NE from Carn Ban S Top is Bodach Mor which the ZTV shows as having greater visibility. A similar distance again ENE is Carn a' Choin Deirg with more visibility still as the screening from Carn Chuinneag diminishes with the changing angle of view. Assessment needs to consider the full ZTV and not just the handful of Viewpoints selected.

			The impact of the visibility of other wind farms is overstated in the LVIA (para 6.8.47). This is a characteristic throughout the LVIA, including in the WLA assessment. Excluding pre-planning Glasa, massed wind farms are visible clustered at 60-70° and 170-180°, well to the left and right of Creachan at 103°. In the same angle as Creachan is the Beinn Tharsuinn-Coire na Cloiche-Beinn Oighrean cluster which is 10km more distant with (currently) much smaller turbines. Novar/Novar 2 at 123° is similarly distant with (currently) small turbines. The visual and perceptual impact from existing wind farms is of a different order of magnitude to that to be expected from Creachan.
9	Ben Wyvis (14 km)	Moderate adverse, significant Cumulative: minor adverse, not significant	Both solus and cumulative assessments **underplay** the significant intrusion into high wild country that Creachan would represent. Creachan would clearly be a significant insertion of wind infrastructure into an area of moorland adjoining a distinctive mountain, with all hubs and almost all towers in view, kinetically competing with Carn Chuinneag for the viewer's attention. The photomontage of the proposed turbines in Figure VP9.4 is misleading, with the inserted Creachan turbines appearing hazier than the more distant, much smaller Coire na Cloiche operational turbines which appear less 'soft-focus' in the baseline photography. Creachan, taken with other actual and proposed developments, would contribute to 120° of turbines to the north and northeast (from 330° to 90°). The visual enjoyment of the usual route up and down Ben Wyvis is already spoilt by the Lochluichart-Corriemoillie cluster. How disappointing it would be to then reach the summit to be confronted with Creachan spanning what is presently open space (albeit with consented wind farms lying lower in the far distance) between eastern and western operational/consented clusters. Again, it would reduce Carn Chuinneag to just another a hill with adjacent turbines. Any vestige of perceived wildness would be absent.

19. There are a number of instances of the LVIA and supporting appendices being imprecisely written. To give some examples:

    a. The LVIA states that "*The Proposed Development will also be seen in the context of other existing wind farms on the broad upland ridge east of Ben Wyvis.*" (p.6-32). As Figure 6.2 shows clearly, there is no such topographical feature. There is a sequence of hills separated by deep glens.

b. In the Visual Assessment (TA 6.6 p.43) Creachan is referred to as 'slightly closer' to Carn Ban South Top (VP 11) than is Coire na Cloiche wind farm. The former would be 17km distant; the latter c.26km distant. That is not, in this context, a slight difference.

20. The LVIA is not the only part of the documentation prone to drafting oversights useful to the applicant. Planning Statement 4.6.35 notes the LVIA's assessment of significant moderate adverse visual effects at viewpoints 6, 9 and 11 but omits the significant major adverse solus effect assessed at Viewpoint 1. It does later at 4.6.39 acknowledge the significant adverse cumulative effect.

21. The LVIA claims that "*The Proposed Development is set within a large-scale landscape which reduces the perception of the scale of the wind turbines*." (p.6-34). Mountaineering Scotland contends that the opposite is the case: the scale of the current generation of turbines is such that they reduce the perception of the scale of the landscape, both vertical and horizontal. People observing them do not realise how large they are and thus 'shrink' the landscape to fit their misperception of the scale of the turbines. Mountaineering Scotland's evidence for this is anecdotal, based on conversations with hillwalkers in the field but we are not aware of any more robust evidence that would support the LVIA's claim.

The mountaineering experience

22. 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.

23. The applicant's Socio-economics, Recreation, and Tourism Assessment uses VisitScotland statistics to show that *"The key motivations for visitors choosing to stay in the Highlands include scenery and landscape, history and culture, and outdoor activities"* and then states that "*These major motivations to visit are unlikely to be diminished by the presence of a wind farm.*"(p.34) apparently on the basis of three reports (cited on p.29), two of which are well out of date and the third of which – setting aside methodological issues – considered only generic tourism, not specific segments of the market such as hill-walkers that might be particularly motivated by scenery, landscape and outdoor activities.

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 being 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 actual 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 then make fewer repeat visits as a consequence. In contrast, only 2% would go to such an area more often while it would have no impact on 35%. Please note these percentages amount to 99% due to 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.

Conclusion

26. The above assessment shows that the proposed Creachan wind farm would have a significant adverse visual impact upon an extensive area of perceptually wild hills, from the well-trafficked Ben Wyvis to the remote Carn Ban South Top. This impact is inherent in its location and cannot be mitigated by design tweaks.

27. The proposed development is contrary to national policy (NPF4). Its siting would not 'preserve natural beauty'. It would have a significantly adverse impact upon the visual amenity and overall experience of those visiting the hills, and sometimes glens, of the interior of Easter Ross and represent a substantial change to the established pattern of wind farm development. Its potential adverse impact would far outweigh its benefits.

28. Mountaineering Scotland **objects** to the proposed Creachan wind farm.

Yours sincerely,

Stuart Younie

CEO, Mountaineering Scotland