Energy Consents Unit
Section 36 Application (Ref: ECU00004966)
Proposed Glen Lednock Wind Farm, Perth & Kinross.

Objection
On behalf of the Save Glen Lednock

Prepared by Dr Chris Ford, MRTPI

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ELECTRICITY ACT 1989 as amended
TOWN & COUNTRY PLANNING (SCOTLAND) ACT 1997.
The Electricity Works (Environmental Impact Assessment)(Scotland) Regulations 2017.

OBJECTION in respect to the proposed Glen Lednock Wind Farm, on behalf of **Save Glen Lednock**, a group of affected third party local residents, in relation to the application under the Electricity Act 1989 s.36 and Schedules 8 and 9, for the construction and operation of a wind farm development comprising up to 19 wind turbines with associated infrastructure, known as Glen Lednock Wind Farm, near Comrie, Perth and Kinross.

Prepared by Christopher D Ford BA, MBA, MSc, PhD, MRTPI.

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1 INTRODUCTION

1.01 This **Objection** is in respect to the proposed s.36 Application under the Electricity Act 1989, for the proposed 'construction and operation of a wind farm development comprising up to 19 wind turbines with associated infrastructure', known as the Glen Lednock Wind Farm (ECU reference ECU00004966) (Proposal), on land to the west of Loch Lednock, centred at Ordnance Survey Grid Reference NN 68868 29213 (Site), in Glen Lednock near Comrie, Perth and Kinross. The Application has been made by Glen Lednock Wind Farm Ltd per Low Carbon (Applicant).

1.02 The Objection is submitted by **Save Glen Lednock** (SGL), a group of affected third party local residents [1]. The submission has been prepared by Dr Christopher Ford, a Chartered Town Planner specialising in the spatial aspects of energy systems and energy policy.

1.03 This Objection sets out and discusses the relevant planning and energy policies and then weighs the merits of the Proposal against these. The Local Development Plan (LDP) for Perth and Kinross Council is considered first. Then Scottish national planning policies are considered, together with relevant energy policies and the progress being made with these. Next UK Government energy policy is considered, particularly in relation to new policy developments and the way these are shaping the energy picture. The Objection then weighs the planning balance and considers the Proposal in the light of the relevant policies. It culminates by setting out conclusions. The Objection opens by briefly setting out the situation of the Site.

2 THE SITE AND SITUATION

2.01 This section of the Objection describes the development Site, its general location and its situation. This provides a spatial context in which the Site is positioned to facilitate an understanding of the circumstances of the Proposal.

2.02 The Site consists of approximately 9 square kilometres of open moorland, together with approximately 2 square kilometres to provide for a 150m wide buffer area for a

[1] This Objection is supplementary to representations already made by the group and individual members.

construction access some 13km in length. This gives an overall Site area of some 11 square kilometres.

2.03 The Proposal is located in the Grampian Mountains in Perthshire close to the edge of the Highland Boundary Fault. The Site lies to the west of Loch Lednock, between that and the 'Graham' classified mountain of Creag Ruadh, in Glen Lednock. The Glen is enclosed within a ring of mountains consisting of Meall Nan Fiadh (269654 727485), Creag Ruadh (267422 729250), Meall Daimh (266507 730670), Ruadh Mheal (267692 731457), Creag Uchdag (270443 732598), Crea nan Eun (272717 731845), Carn Buidhe (275032 732025), Ben Chonzie (277333 730851) and Carn Chois (279149 727753). The largest of these, Ben Chonzie, is classified as a 'Munro'. At the foot of the deep Lednock valley lies the village of Comrie and the River Earn. Glen Lednock is aligned north-west to the south-east. To the south east of Glen Lednock lies the more open lower areas of Strathearn and lower Perthshire. To the north of Glen Lednock lies Loch Tay and onwards into the Grampian mountains.

2.04 The Glen Lednock valley is open to the south east. The ring of hills around the Glen Lednock range in height, on the western and northwestern sides, from 500m to 650m. On the eastern side the hill ring is higher, reaching from 800m up to 880m. The highest point is Ben Chonzie at 931m. The Proposal turbines are mostly 200m tip heights with the higher placed turbines being limited to 180m. These turbines are situated on ground of between 540m and 650m above ordnance datum (AOD). Consequently, the tops of the turbines, with AOD heights of between 700m and 830m, would be visible beyond the ring of hills enclosing the Glen, as well as being visible within Glen Lednock itself.

2.05 As with the rest of Scotland, the area within the Site has been classified under NatureScot's national Landscape Character Assessment. This gives Landscape Character Types (LCTs). The largest LCT area within the Site is classed as 'Summits and Plateaux - Tayside' (Type 376). The lower parts of the Site are classified as 'Mid Upland Glens' (Type 371). The extremely long access road also passes through 'Lower Upland Glens' (Type 372). The 'Summits and Plateaux - Tayside' (Type 376) LCT is the local regional component of a series of 'Summits and Plateaux' LCTs. These cover the Grampian Mountains stretching back into the Cairngorms, from Loch Lomond to near Stonehaven, along the northern edge of the Highland Boundary Fault. A substantial proportion of these 'Summits and Plateaux' LCTs are covered by National Parks (NP) and National Scenic Areas (NSA).

2.06 Whilst the Site itself is not covered by NP or NSA designation there are several protected scenic areas in the vicinity of the Proposal. The Loch Lomond and Trossachs National Park is 2.5km to the south of the Site. The River Earn National Scenic Area lies

some 2km south of the Site. The Loch Rannoch and Glen Lyon NSA is situated 8km to the north of the Site. The Loch Tummel NSA lies 25 km to the north east of the Site. Whilst the River Tay NSA lies 28 km to the east of the Site. Beyond these, the Cairngorm National Park lies to the north east some 40km away. Lying between the Site and the surrounding NSAs are a series of regional scenic or Local Landscape Areas (LLA). To the north and west of, and adjoining the Site at its north west boundary, is the Creag Garbh LLA. The Loch Tay LLA lies 5km away across the north of the Site. To the east of the Site lies a connected series of three LLAs. This is made up of 'Glen Quaich', 'Sma Glen and Glen Almond', and the 'Upper Strathearn' LLAs. The Site access is situated within the Upper Strathearn LLA. Overall, it is evident that the Proposal is located in a general area which has been given very higher scenic landscape value.

2.07 The Proposal Site would directly affect various other forms of environmental protection. The Site access road seeks to pass through two Sites of Special Scientific Interest (SSSI). The Fintulich SSSI (639) and the Craig More SSSI (421) are directly affected by the Site. Whilst the Comrie Wood (396) and Ben Chonzie (178) SSSIs are in the vicinity of the Proposal. Various parts of the proposed Site access road are also covered by protections of Ancient and Native Woodlands. Various sections of the Proposal access road are established public rights of way and core paths as well as various private access roads and public highways.

3 LOCAL DEVELOPMENT PLAN POLICIES.

3.01 This section of the Objection sets out the local development plan (LDP) policies relevant to the Proposal. The current Perth and Kinross LDP was adopted in November 2019. As set out below the current National Planning Framework was renewed in 2023. Guidance issued with this states that were there is conflict in policies between the Framework and the LDP, that the later document should take precedence. This means that there may be areas where the LDP needs to be set aside in order that Framework policies apply. However, the policies contained with the LDP are generally in alignment with the policies of the national framework.

3.02 The key LDP policy relevant to the Proposal is Policy 33: Renewable and Low-Carbon Energy. Policy 33A states that proposals for the "*development of renewable … sources of energy would be supported subject to the following factors being taken into account*". These include "*the individual and cumulative effects of developments and associated transport/ electricity infrastructure, on: biodiversity and natural heritage;*

woodland and forestry; landscape character, LLAs, wild land areas and NSAs; visual amenity; … hydrology … and flood risk; air quality including any effects on greenhouse gas emissions and impacts of construction; … residential amenity of the surrounding area …".

3.03 Policy 33 also requires consideration is given to: "(b) *the contribution of the proposed development towards meeting carbon reduction and renewable energy generation targets*"; "(c) the net economic impacts of the proposal …"; "*(d) transport implications and in particular the scale and nature of traffic likely to be generated …*"; *"(e) construction and services tracks and borrow pits associated with the development*"; "(*f) effects on soils including carbon rich soils, deep peat and peatland habitats …*"; "(*g) the effects on public access, reaction and tourism interests including core paths, scenic corridor and other established routes for public walking, riding and cycling*"; … "*(j) cross-boundary impacts including any impacts on the qualities of the Cairngorm and Loch Lomond and Trossachs National Parks*".

3.04 In general, whilst supporting renewable energy developments, such as this Proposal, the LDP policy sets out clear assessment criteria against which the merits of any proposal needs to be judged. Notably these include natural heritage, landscape, visual effects, residential amenity, contribution to targets, net economic impact including on the local economy, transport impacts, construction access tracks, soils particularly peats, and importantly, given the socio-economic character of Perthshire, particular attention is given to recreation, public access and tourism as well as impacts on National Parks.

3.05 Policy 33B gives particular support to the repowering and extending of existing renewable energy developments. This is because such developments "*make the best use of existing sites and through the continued use of established infrastructure such as grid connections* … ". Policy 33B also supports extension to existing facilities.

3.06 Policy 33D of the LDP sets out a 'spatial framework for wind energy'. However, as indicated above (3.01) the National Framework superseded prior local development plans. The 2023 Framework removed the Scottish Planning Policy (last updated June 2020), which contained the spatial framework policies for wind energy and set out the national 'spatial frameworks' approach. Therefore, LDP Policy 33D has been superseded and made non applicable.

3.07 As well as Statutory LDP policies some policies are enhanced with additional guidance from the Council. Supplementary guidance from the Council has been provided in the 'renewables and low carbon energy' guidance, from 2019. As the Council themselves acknowledge, on their LDP website, this has largely been superseded by the National

Framework and the Council are currently preparing revised guidance. The 2019 guidance does, however, give some indication of how the Council should assess the Proposal. For example, in regard to Landscape the 2019 guidance says "*all submissions should consider whether the proposal would affect: landscape character taking into account scenic value and areas sensitive due to historical and cultural or recreational value; views from and to locally important viewpoints and iconic viewpoints, … views to iconic and locally important landmarks including the Highland Boundary Fault, monuments and natural features; views from neighbouring receptors including dwellings core paths, principal tourist and amenity routes and recreation areas*" (p31).

3.08 It is evident in this that landscape character, across Perthshire, is not only of value in relation to the landscape character itself. The guidance is strongly identifying that the landscape plays a crucial role in the area in relation to other aspects of its value. These are: that the area's identity comes from the 'iconic landmarks'; it has importance because of the area's position, such as on the Highland Boundary Fault and as the key entry point to the Grampian Mountains and Highlands of Scotland; landscape is a very strong natural feature, which is evident across the River Tay plain and well beyond; the area's exceedingly strong role in regard to its recreation role for Scots and for those from beyond, is derived from its landscape; and in relation to the area's principal economic activity as a key tourist area, which again is obtained from the region's strong natural landscape character.

3.09 The Perth and Kinross LDP includes policies which explicitly give landscape an important position. Confirming the high value of the local landscape in the LDP Policy 39 sets out the criteria for evaluating development proposals in regard to landscape. All proposals, including hill tracks, need to "*be compatible with the distinctive characteristics and features of Perth and Kinross's landscape*". Consequently, "*development proposals would be supported whether they do not conflict with the aim of maintaining and enhancing the landscape qualities of Perth and Kinross*".

3.10 In regard to landscape proposals need to show: *"(a) they do not erode local distinctiveness, diversity and quality of Perth and Kinross's landscape character areas, the historic and cultural dimension of the area's landscapes, visual and scenic qualities of the landscape and the landscape experience; (b) they safeguard the views, viewpoints and landmarks from development that would detract from their visual integrity, identity or scenic quality"; (c) they safeguard the tranquil qualities of the area's landscape; (d) they safeguard the relative wildness of the area's landscapes … ; (e) they provide high-quality standards in landscape design, …; (f) they incorporate measure for protection and enhancing the ecological geological geomorphological archaeological historic cultural and visual amenity elements of landscape; (g) conserve the experience of the night sky … ".*

3.11 The Policy also refers to 'local landscape areas' (LLAs). Whilst this Proposal is not located within an LLA there are several in the vicinity. There are also National Scenic Areas and National Parks nearby. Given their proximity it is possible that these would be affected by the Proposal.

3.12 The LDP has other policies which have generic relevance to the Proposal. These include policies in respect to Policy 1A Placemaking, 2 Design statements, 15 Public Access, 26 Scheduled Monuments, 27 Listed Buildings, 28 Conservation Areas, 31 Other Historic Assets, 38A Nature Conservation Sites, 38B National Designations, 38C Local Designations, 40 Woodland and Trees, 41 Biodiversity, 42 Green Infrastructure, 47 River Tay Catchment, 51 Soils, 55 Artificial Light, and 60 Transport. These policies are referred to in the LDP for their specific terms and are not rehearsed here.

4 SCOTTISH GOVERNMENT PLANNING & ENERGY POLICY.

4.01 The Scottish Government's Planning and Energy Policy is encapsulated in the National Planning Framework Four (NPF4) and the Onshore Wind Policy Statement, together with other associated documents. Consideration is first given to NPF4, then to other national policies.

National Planning Framework Four

4.02 Scottish planning policy for the Proposal is covered by the National Planning Framework Four (NPF4), adopted in 2023. The most pertinent policy to the Proposal within this is Policy 11, on Energy, which refers to "*wind farms*" (p53). Also relevant to consideration of the Application are: NPF4 Policies 1, Climate and Nature Crises; Policy 3, Biodiversity; Policy 4, Natural Places; Policy 5, Soils; and Policy 7, Historic Assets. This Objection considers the relevance and terms of each of these Policies, in turn.

4.03 NPF4 Policy 11, on energy, seeks to "*encourage, promote and facilitate all forms of renewable energy development … include*[ing] *energy generation …*", with the 'outcome' aim of the "*expansion of renewable, low carbon and zero emission technologies*" (p53). Policy 11(a) specifies that "*development proposal for all forms of renewable low-carbon and zero emissions technology would be supported*", including "*wind farms including repowering, extending, expanding and extending the life of existing wind farms"*.

4.04 Policy 11 goes on to identify that "(c) *development proposals would only be supported where they maximise net economic impact, including local and community social-*

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economic benefits such as employment, associated business and supply chain opportunities". However, there is little guidance on what 'maximising' means in this context.

4.05 Policy 11 (e) requires that "*project design and mitigation would demonstrate how*" various impacts would be addressed. The criteria, relevant to the Proposal, include:

(i) "*impacts on communities and individual dwellings, residential amenity, visual impact, noise and shadow flicker*";

(ii) "*significant landscape and visual impacts, recognising that such impacts are to be expected for some forms of renewable energy. Where impacts are localised and/ or appropriate design mitigation has been applied, they would generally be considered to be acceptable*";

(iii) public access;

(iv) *impacts on aviation and defence interests including seismological recording*;

(v) telecommunication;

(vi) "*impacts on road traffic and on adjacent trunk roads, including during construction*";

(vi) "*impacts on historic environment*";

(ix) "*biodiversity including impacts on birds*";

(x) "*impacts on trees, woods and forests*";

(xi) "*proposals for the decommissioning of developments, including ancillary infrastructure, and site restoration*";

(xii) *the quality of site restoration plans including the measures in place to safeguard or guarantee availability of finances to effectively implement this plans; and*

(xiii) "*cumulative impacts".*

4.06 NPF4 Policy 11(e) concludes by saying that "*when considering these impacts, significant weight would be placed on the contribution of the proposal to renewable energy generation targets and greenhouse gas emission reduction targets*".

4.07 NPF4 states that "*National developments are significant developments of national importance that would help to deliver our spatial strategy*" (p99). This includes renewable generation defined as "*on and offshore electricity generation including electricity storage, from renewable exceeding 50 megawatts capacity*" (p103). Given the size of the Proposal, being greater than 50MW, it therefore does comply with this designation. Accordingly, the Proposal does have 'national importance'.

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4.08 Beyond Policy 11 Energy, NPF4 requires that various other Policies are to be considered and weighed within decision making. NPF4 states that *all* Polices within NPF4 need to be taken into account as the document is to be *"read as a whole"* (p95).

4.09 NPF4 identifies and stresses the paramount gravity not just of climate change but also of **the nature crisis**. As the Minister emphasises in his Foreword, Scotland now faces the twin challenges of climate change *and* the nature crisis. NPF4 says that the key to delivering National Planning Policy for 'Sustainable Places' is "*tackling the climate **and nature crises***". It also states that the Policy Outcome is a 'zero-carbon, nature positive place'. NPF4's first Policy is that "*significant weight would be given to the global climate and nature crises*" when considering all development proposals (Policy 1- Tackling the climate and nature crisis). The Minister describes these as twin challenges as being "*at the heart of our vision for future Scotland*".

4.10 NPF4's Policy 3 'biodiversity' requires that "*development proposals would contribute to the enhancement of biodiversity ...*". Relevant to this Proposal, Policy 3(b) states, "*development proposal for national or major development, or for development that require an Environmental Impact Assessment would only be supported where it can be demonstrated that the proposal would conserve, restore and enhance biodiversity, including nature networks so that they are in a demonstrable better state than without interventions ... . Proposal within these categories would demonstrate how they have met all of the following criteria: … significant biodiversity enhancements are provided, in addition to any proposals for mitigation. … ; local community benefits of the biodiversity and /or nature networks have been considered*" [2].

4.11 Reflecting the dual priority of the nature and climate crisis, Policy 3 introduces major new requirements in respect to not only protecting but positively enhancing biodiversity. This applies to this Proposal. Decision making on this Proposal therefore has to ensure that the new policy tests, set out in Policy 3, have been met.

4.12 NPF4 Policy 4 on 'natural places' states "*development proposals which by virtue of type, location or scale would have an unacceptable impact on the natural environment, would not be supported*" (4(a)).

4.13 Policy 5 Soils states "*development proposals would only be supported if they are designed and constructed: i) in accordance with the mitigation hierarchy by first avoiding and then minimising the amount of disturbance to soils on undeveloped land; and ii) in a manner that protects soils from damage including from compaction and erosion and that minimises soil sealing*".

[2] NPF4 p36 is referred to the full terms.

Onshore Wind Policy Statement and Other Policy Developments

4.14 As well as NPF4, Scottish Government policy pertinent to the Proposal is the Onshore Wind Policy Statement (OWPS), published December 2022. The key features of the Onshore Wind Policy Statement (OWPS) are: Setting an 'overall ambition of 20GW of installed onshore wind capacity in Scotland by 2030'; The establishment of a 'Strategic Leadership Group' and a 'Sector Deal' for onshore wind.

4.15 The OWPS gives coverage of specific challenges such as environmental and other considerations of peats (3.3), forestry (3.4), biodiversity (3.5), landscape & visual amenity (3.6), noise (3.7), tourism (5.6), aviation (6.1), aviation lighting (6.2), transport requirements (7.1), and transmission (8.0).

4.16 The OWPS calls on industry to ensure delivery of the Scottish Government policies on the Just Transition, community benefits, diversity in the workforce, significantly strengthening local content and local employment, and reducing waste.

4.17 Overall, the OWPS reaffirms the well-known decision criterion of 'the right development in the right place'. Echoing NPF4, the conclusion also emphasises that "*we are also in a nature crisis.*" (p49).

4.18 In respect to the 20GW ambition, at the time of publishing (December 2022) the OWPS records that there was 8.7GW of then currently operational onshore wind energy capacity in Scotland (1.1.5). The latest Renewable Energy Planning Database (April 2025) shows that Scotland currently has 9.4GW of operating onshore wind capacity, with a further 1.7GW under construction, and 8.9GW consented and awaiting construction of onshore wind capacity. This therefore provides an accumulated 20.0GW of onshore wind capacity, which represents 100% of the Scottish Government's 20GW ambition by 2030.

4.19 The OWPS also emphasises the importance of repowering (5.3) and extending existing wind farms. The OWPS cites examples of repowering providing increased wind farm capacity from 18.7MW to 80MW (5.3.7). This is more than a fourfold increase [3] in capacity. The author is aware of similar repowering capacity increases elsewhere. For example, at Hagshaw, which would increase from 16MW to 79MW.

4.20 The 2021 draft OWPS Refresh identified 2.5GW of existing wind farm capacity which is at the end of life and due for repowering [4]. At this repowering capacity and rate, repowering of existing wind farms in Scotland can provide an additional 7.5GW of

[3] In fact, 4.27 times (80/18.7=4.27).
[4] Scottish Government, Onshore Wind Policy Statement Refresh, consultative draft, 2021, section 2.2.1.

onshore wind capacity (4*2.5=10-2.5=7.5). The OWPS also records (5.3.7) that repowering across the UK has resulted in a 160% increase in capacity. Applying these lower repowering increase rates [5], repowering would still provide 4GW of increased wind farm capacity in Scotland.

4.21 Taken with the existing operating capacity, the under-construction capacity and the consented awaiting construction capacity pipeline, which totals 20GW, the increased capacity through repowering means that **Scotland is already delivering in excess of 20GW of onshore wind energy capacity**. Either 24GW (20 + 4 repowering) or 27.5 GW (20 +7.5 repowering). Scotland is therefore already comfortably set to achieve and exceed the Scottish Government's 20GW ambition.

4.22 This calculation also does not take account of any capacity which might be achieved through extensions to existing wind farms, as highlighted in the OWPS. Extensions to existing wind farms, where the energy use has been established, would in general produce significantly less adverse environmental impacts than developments at new virgin sites, as, like this Proposal, new virgin sites would unavoidably introduce adverse effects to new locations.

4.23 This all therefore raises questions on the merits of awarding consents for new wind farm developments on new separated virgins sites, such as this Proposal. Indeed, it therefore seems that that the precise formulation of the terms of NPF4 Policy 11a is not accidental. This refer to wind farms as "*including repowering, extending, expanding and extending the life of existing wind farms*". There is no explicit mention of wind farms on new virgin sites. This Proposal is not a repowering or an extension to an existing wind farm. It is a proposal for a wind farm in a new location. It thus falls outside the scope of the NPF4 definition. Importantly, as the evidence here shows, **this Proposal is not required for delivery of the Scottish Government's 20GW ambition.**

4.24 Scottish Government data also records that Scotland's indigenous electricity demand is 3.6GW on average across the year [6]. This is clearly substantially below the current operational onshore wind energy capacity of 9.4GW and even further below 20GW ambition.

4.25 NPF4 and the OWPS indicates that Policy recognises that wind energy in Scotland can be exported out of Scotland. However, the ability to the export of electricity is, currently and for the foreseeable future, insufficient to carry the excess energy out of

[5] Due to the limitation applied in England due to greater sensitivity to turbine heights.
[6] Scottish Energy Statistics Hub data for Total Final Energy Consumption by Sector shows the Gross Electricity Consumption for 2022 as 31,551 GWh in the year. Divided by 365 days per year and 24 hours per day this gives the average Scottish electricity consumption over the year as 3.6GW.

Scotland. As a consequence, wind farms are currently routinely curtailed, that is turned off, in Scotland when the wind is blowing. This curtailment amounts to 25% of current operating wind farm capacity.

4.26 As well as the OWPS various other developments in Policy are also taking place. In January 2023 the Scottish Government issued a draft Energy Strategy and Just Transition Plan (ES&JTP). The draft ES&JTP set the vision for policy to address climate, saying "*we need to transform the way Scotland generates, transports and uses energy*" (p7). The ES&JTP identifies the need to decarbonise energy consumption for heating, transport, agriculture and industry (Chapter 4), and scale up renewable energy supply and reducing reliance on carbon-based energy sources (Chapter 3).

4.27 Both the ES&JTP and the OWPS identify challenges of the transition to net zero. These include 'energy systems and regulation' such as transmission 'network charging' (OWPS 8.3), 'energy markets and network regulation' (ES&JTP 5.2), 'energy networks' (ES&JTP p136), 'constraint cost' (ES&JTP p137), and 'grid charging methodologies' (ES&JTP p138). However, as the ES&JTP (Chapter 7) and the OWPS (Chapter 8) recognises these matters are outside Scottish Minsters control and the responsibility of the UK Government, Ofgem and the Electricity System Operator.

4.28 Despite now being over two years old since publication (and two years late at that point), the draft ES&JTP has not been finalised. It unclear why this is, but it seems likely that priorities have changed. It is also notable that many of the policy issues, identified in the draft ES&JTP, have been overtaken by events and subsequent developments in Policy elsewhere. There have been a number of substantial developments in the regulatory system (since January 2023).

4.29 There has also been significant development in UK Government policy. It is also notable that in recent months there has been new co-operative arrangements entered into by the Scottish Government with the UK and Welsh Governments, in regard to energy policy and regulation. These matters are covered below in the next section, on UK Government energy policy and policy developments.

5 UK GOVERNMENT ENERGY POLICY AND POLICY DEVELOPMENTS

5.01 The Application is made for the generation of renewable energy under the Electricity Act 1989. This is UK legislation. It is therefore an energy related proposal. Under the terms of the Scotland Act 1998 'energy' is a reserved matter. The Proposal therefore falls within the scope of the UK Government. As the OWPS and draft ES&JTP both

recognise energy policy, markets and regulation are within the remit of the UK Government, Ofgem and the National Electricity System Operator (NESO). UK Government energy policy, energy market regulation and related matters are therefore appropriate matters for consideration for this Application.

5.02 Prior to the change of UK Government (in July 2024) various long-term changes to energy policy and energy market regulations have been under development. These market regulatory reforms seek to address the geographic imbalance of generation and demand with Great Britain, and thereby minimises the need for transmission investment. The key driver for these reforms is the statutory obligation to minimise cost to consumers [7]. By 2021 the UK Government and Ofgem had publicly recognised the transition to net zero needed major market reform. Analysis for reform was undertaken by Ofgem and then the NESO [8], with the Government moving substantial reform forward with its Review of Electricity Market Arrangements (REMA) in July 2022. This resulted in a Second REMA Consultation Document being issued in May 2024 [9].

5.03 This 2024 REMA Consultation states that "*a range of underlying market failures and limitations of existing interventions mean current electricity market framework would not deliver the secure clean low-cost electricity system we need in the future*" (p9). The Consultation had four key proposals relating to: 'passing on the value of lower cost renewables'; 'retaining Contract for Difference (CfD)' with revisions; moving away from unabated gas; and operating a renewable energy system cost effectively. Essentially these say that; use of unabated gas would in time fall away; CfD support would continue; the Capacity Market should be retained; short and long durations storage is needed; and it is vital that the locational signals to the market are substantially strengthened (see pages 11 to 13).

5.04 The last of these recognises that the cost of the energy system to consumers is being considerably increased [10] because renewable energy developments are being developed in locations that are a long way from centres of demand [11]. As the REMA Consultation observes "*resolving this challenge [12] is therefore one of the most significant issues which needs to be addressed in our future energy system*" (p87).

[7] Electricity Act 1989 (as amended), section 3A, 'The principal objective and general duties of the Secretary of State and the Authority'.
[8] The National Electricity System Operator, previously the National Grid Electricity System Operator.
[9] DESNZ, Review of Electricity Market Arrangements, Second Consultation Document, May 2024.
[10] These increased cost arises from the cost on building new transmission infrastructure at considerable distance from centres of demand, the compensation paid for curtailment and the cost of balancing the electricity system.
[11] For example, renewable generation in Scotland is long way from the demand in London.
[12] '*This challenge*' refers to the need to substantially strengthen locational signals to the market so that the renewables-based energy system delivers cost effective energy by locating new development close to demand.

5.05 The REMA Consultation gives further detail on the scale of the problems arising from locating renewables energy distant from demand. It states that the NESO has to take "*balancing actions at times exceeding 50% of national demand*" (p87). That is 50% of the Great Britain's total national electricity consumption!

5.06 Whilst the Consultation avoids being specific on the locations where these problems arise, under the 'case for change' it cites that "*where the location of supply and demand is increasingly at odds*" (p87) and "*locations where energy cannot be transported to the rest of GB due to networks constraints (i.e. Scotland*)" (p88). Analysis of constraints shows that 95% of all UK wide curtailment occurs in Scotland. That is because, as set out above, there is a considerable excess of wind energy generating capacity in Scotland, well above Scottish electricity consumption and export capacity.

5.07 Under the REMA programme the UK Government has been considering ways of "*sending more efficient locational signals through electricity markets, introducing more efficient locational signals*" (p88) to generators of electricity, since it is only prospective new electricity generators who are free to choose locations. The options considered by the Government are either 'Locational Marginal Pricing' (LMP)[13], or 'Alternatives to locational pricing' with a Reformed National Pricing system. LMP would have changed the current market, which has a single GB wide electricity price, by having different electricity prices for each zone (for example Scotland) or region.

5.08 The alternative measures include significantly increasing transmission charges to generators to reflect the full cost of transmission they use and revising "*network access*" rights [14]. Under both options generators 'would only have firm access rights within their local zone'. This would mean, for example, **ceasing the right for generators to export electricity out of Scotland**.

5.09 In July 2025 the UK Government announced its decision not to proceed with LMP, that instead it is applying a 'Reformed National Pricing' system [15]. The Government still takes the view that there is a *"misalignment between where our energy is generated and …* where *the power is consumed"*. The revised arrangements would *"provide stronger signal for efficient siting of new assets"*. This approach includes "*greater strategic planning as well as market reforms"* (p5).

5.10 These revised arrangements would mean the energy system is not be dependent upon developer choice for the siting of new generation (as has previously been the case).

[13] Also known as 'zonal pricing' or 'regional pricing'.
[14] Including for both new and existing generators (p99).
[15] DESNZ, REMA Summer Update, July 2025.

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Instead, there would be central planning and control of the requirement for new generation allied to *"better solutions to factor the cost of network construction and constraints into the siting decision made for new generation"* (p6). Under the Reformed National Pricing it is expected that transmission charges would rise substantially in the north of GB (i.e. Scotland) to financially discourage new generation locating there. New generation that locates closer to large demand centres in the south needs less transmission.

5.11 Under the current UK Government [16] energy policy is being revised and is currently undergoing rapid change. The new key and overriding policy objective introduced by the new UK Government is to decarbonise the electricity system by 2030. Known as the 'Clean Power 2030 Action Plan' [17] (CP30), this policy seeks to deliver an electricity system based on 100% renewable electricity generation, when available, by 2030.

5.12 It is, however, important to recognise that **Scotland is already compliant with the terms of Clean Power Action Plan definition of what 'Clean Power' means**. As set out above, Scotland already has sufficient renewable energy for its own consumption and only uses fossil fuels when wind energy is not available. As a result, Scotland does not need further renewable generation.

5.13 As a result of the geographic imbalance of renewable generation in relation to electricity demand the UK Government has called for a reform of connection arrangements. This includes new generators' rights to connect to the electricity grid. The Government states that the current "*grid connection process is not fit for purpose*" [18]. As a consequence of this Ofgem have decided to revise electricity generators right of access to the grid, so that they would only have access where it is 'needed'. This need is based on 'strategic alignment' to the CP30 objective. That is for regions where there is a shortage of low carbon generation.

5.14 An important component of the CP30 Plan is that the UK Government has, for the first time, set out clear locational requirements of where future renewable generating capacity is needed. The CP30 Plan specifies the quantity of capacity required for each technology, for each nation and region in Great Britain, for 2030 and 2035 [19].

[16] Elected July 2024.
[17] DESNZ, Clean Power 2030 Action Plan: a new era of clean electricity. 13 December 2024.
[18] Ministry of Housing, Communities & Local Government, Guide to the Planning and Infrastructure Bill, 11 Mach 2025.
[19] It is noted that the Applicant refers to CP30 (PS 4.3.21-23). The Applicant's statement in respect to CP30 is highly selective and a misrepresentation of the Policy. It is reasonable to classify the Applicant's statement as providing intention omission of the key parts which have particular relevance to the Proposa. This includes the main objective of CP30 and especially the CP30 target for onshore wind in Scotland – which the Applicant makes no mention of.

5.15 For onshore wind in Scotland the CP30 specified target capacity for 2030 is given as 20.5GW, with 21.2GW required in 2035. As the data above shows, this effectively is the capacity that Scotland is already set to deliver through its existing pipeline of consented capacity together with an allowance for re-powering of older existing wind farms. The CP30 onshore wind capacities therefore demonstrate **that no further consents are needed for wind farms in Scotland.** Furthermore, since any capacity beyond this does not provide 'strategic alignment' to the CP30 objectives any wind farms beyond this would not be awarded grid connection access.

5.16 As part of CP30 Ofgem states that the grid connection queue [20] for the whole Great Britain has now exceeded 750GW of capacity seeking to connect to the electricity system. This is more than three times the capacity needed for UK wide Clean Power and Net Zero. There is now a plethora of choices of renewable energy development options across the UK. Also, as the volume of new renewables connected the regional distribution networks grows, the amount of electricity that requires to be conveyed over transmission network when electricity demand is at its lowest, would continue to fall. It is expected that summer 2025 is seeing the lowest level ever of electricity transmission. There is therefore no long-term need for the rest of the UK to import electricity from Scotland. To do so results in increased costs to consumers.

5.17 In summary, the UK Government energy policy and market regulation now specifies where new generation should be located. The government has set the requirement for onshore wind capacity across the country. The target for onshore wind in Scotland has already been met by consents. The Government is reforming grid connection arrangement to limit the award of grid connection rights for new developments which are not required. Further disincentives are being applied to discourage further onshore wind developments in Scotland by substantially increasing transmission and grid connection charges to new onshore wind farms.

6 APPLICATION OF POLICY TO THE PROPOSAL

6.01 Having set out the relevant Policies at the local, Scottish and UK levels, this Objection now turns to assessing the Proposal in the light of the relevant Planning Policies. This weighs the planning balance of the issues, both for and against the Proposal. This starts by considering the potential landscape and visual impacts of the Proposal. Then this section considers the Proposal in the light of the other relevant Policies and other considerations, such a net economic impact and the contribution the proposal can

[20] This is new developments seeking to connect to the electricity system to supply renewable energy.

make towards renewable energy and emission reduction targets. Consideration is also given to the suitability of the environmental impact assessment.

Landscape and Visual Impact

6.02 The starting point for landscape and visual impact assessment is to understand the landscape circumstances or context in which the Proposal is being located. This context is given in the LDP supplementary guidance on Landscape and on Renewables and Low Carbon Energy together with the supporting landscape analysis. This general landscape study provided a landscape assessment for the whole region covered by the planning authority. This assessment is supported by and implements the guidance on landscape assessment from NatureScot' 2022 Landscape Sensitivity Guidance .

6.03 As NatureScot observe, "*landscape sensitivity is a measure of the ability of a landscape to accommodate change arising from specified development types or land management. It combines judgements of the susceptibility of the landscape to change and the values attached to the landscape. Sensitivity assessments or studies provide an indication of this in a manner which is robust, repeatable and capable of standing up to scrutiny*" (2022 NatureScot guidance, para 6).

6.04 As set out earlier whilst the Proposal Site is not within a designated landscape protection area there are several such areas close to and in the general vicinity of the Site. These include: the Loch Lomond and Trossachs National Park, which is close to the 'turbine area' to the south and wraps around the Site to the south west, and west; adjoining the National Park to the south of the Site and extending across the south east is the River Earn National Scenic Area; to the north of the Site and almost linking with the National Park is the Loch Rannoch and Glen Lyon national Scenic Area; to the north east of the Site is the Loch Tummel National Scenic Area; and lying to the east north east is the Loch Tay National Scenic Area; lying within this ring of national level landscape protected area is a series of Local landscape Areas (LLAs); the Creag Garbh LLA wraps closely around the Site from the south west to the north; behind that and from there the Loch Tay LLA carries on to the north east; all of the eastern side of the site, from the north east to the south east is covered by the combined continuous LLAs of Glen Quaich, the Sma Glen and Glen Almond together with the Upper Strathearn LLA. The latter close the circle around the Site by linking up the River Earn National Scenic Area.

6.05 Not only is every main compass bearing around the Site covered by protected landscape, but the Site is covered by landscape protection on every single degree of the compass. The Site is entirely enclosed and surrounded by protected landscapes in every direction. Analysis shows that no other wind farm has been proposed in

Scotland or the rest of the UK which potentially affects so many protected landscape areas. This Proposal has a truly unique claim to fame of potentially affecting over ten different protected scenic areas. There are too many to list them all.

6.06 Shown in Appendix A and B are zones of theoretical visibility (ZTV) for the Proposal. These show areas where visibility of the turbine would exist if the Proposal was built. Appendix A shows the extent of visibility for the tops of the turbines. Appendix B shows the extent of visibility for the turbines hubs or nacelles. Interestingly the extent of the ZTVs is common across both projections. That means where ever the Proposal turbines are visible the visual impact would show a substantial proportion of the structure. Assessment shows that every one of the national and local landscape protected areas listed above would have some visibility of the Proposal. In seeking consent for the Proposal therefore the Applicant is suggesting that these protected and valued landscape areas should not be protected.

6.07 In assessing the landscape effects, the Applicant concludes that the landscape effects of the Proposal are merely *"localised"* (6 p2). At every point in their conclusion the Applicant always comes to the conclusion, that the landscape effects are 'localised'. This, despite the fact that the Proposal has visibility in the adjoining National Park, in the four National Scenic Areas in the vicinity and in ten Local Landscape Areas. Quite clearly the landscape effects of the Proposal cannot be classified as merely 'local'. The effects of the Proposal have an impact on nationally designated landscape protection areas.

6.08 As noted, the Site itself in not a protected landscape area. In many ways that is surprising, for two reasons. Firstly, the landscape qualities of the area and the glen in which the site is situated are very similar to those of the surrounding protected landscapes. Secondly, the Landscape Character Type in which the Site is mostly located, the 'Summits and Plateaux' (LCT 376) is the same LCT which is routinely applied in areas which are used to identify National Parks and National Scenic Areas. It appears that the lack of landscape protection at the Site is more a reflection of the administrative process of designating protected landscapes. Perhaps an oversight. It is also possible the absence of designation reflects a view that no one would anticipate the possibility of any form of development, such as the industrialisation of the landscape envisaged by the Applicant.

6.09 In any event, the landscape at the Site and the surrounding glen is high value and worthy of sustaining in its natural unspoilt state. As the NatureScot Landscape Character Assessment states this area provides an *"important scenic and dramatic backdrop to the lower glens and straths"*. It has *"panoramic views both into and out of adjacent mountainous areas"*. That arises because of the area's *"remote and wild*

character" (NatureScot LCT 376). The Proposal with its nineteen industrial scale turbines and lengthy access roadway would substantially change this landscape character. The Proposal, if consented and built, would remove the "*strong wild character"* of the area. It would mean that the area had succumb to the "*proximity to centres of population"* by being subservient to their needs rather than standing for its iconic untamed natural beauty.

6.10 The LVIA also seeks to assess the visual impact of the Proposal. They claim to take account of recreational receptors, users of core paths and rights of way, hillwalkers and visitors, and others that use the Glen and the surrounding areas. Obviously, this area generally has a high level of tourism, visitors and those engaged in active outdoor and mountain sports, as well as those that simply drive through to enjoy the scenery. The Applicant claims that when operating, the Proposal would have significant effects for only 11km from the proposed development.

6.11 The deep cut valleys in the area mean that at short, medium and longer distances visibility of the Proposal is in some respects limited. Appendix A and B confirm this, by showing that for valleys and glens in the Highland area around the Site, sight of the Proposal is limited. However, whilst these deep cut valleys are protected by the topography lower Strathearn and the high ground in the Highland areas is not.

6.12 Since the Site sits on the edge of the Highlands and the Highland Boundary Fault, the mountains in which the Proposal is located are visible across Strathallan, Strathearn, the lower Tay river plain (near Perth and beyond) as well as south towards Stirling. The Proposal turbines reach up above the tops of the mountains surround the Site. As consequence, the turbines would be visible in these lowland areas. Furthermore, given their bright industrial appearance and the natural backdrop of mountains which they would be seen against, they would stand out as distinct and alien structures.

6.13 Within the Highland areas, whilst the Proposal would be obscured by the topography in the deep cut mountain valleys, the higher areas would not be. The joy of hillwalkers, mountaineers and others that seek to venture up and onto the mountains of the Highlands is to commune with nature. To enjoy the natural vistas and stunning scenery of the Scottish hills. To take in the magnificent scenery in its natural unspoilt state. The Proposal, if built, would fundamentally change that. For those that seek to climb Ben Lawyers, Ben Vorlich and the many other mountains and hills within the area that enjoyment would be lost. Instead, it would be intruded on by industrialisation. Even at the 11km to Ben Lawers or Ben Vorlich the visual impact of the Proposal would be grave. Whilst the effect might be reduced slightly by distance, what would stand out would be the alien structures within the natural beauty of the iconic scenery. Even at a modest scale the Proposal would be alien and intrusive.

6.14 The greatest visual amenity effect would be on locations closest to the Proposal. That would be in Glen Lednock itself, users of the Rob Roy Way, and the southside of Loch Earn (which lies within the National Park). Particularly in Glen Lednock and the western approach to Ben Chonzie, the Proposal would have a dramatic effects and substantially change the visual amenity of the area. At present this is an unspoilt glen which feels wild and remote. Placing 200m turbines within it would end the untouched feel. The Proposal would become the domineering feature.

6.15 The Site access is located within the Upper Strathearn LLA, but there is no apparent consideration of this by the Applicant.

6.16 Overall, in respect to landscape and visual effect the Proposal would significantly change the character and amenity of the area. From lower Strathearn and the lowland areas the Proposal would disfigure the iconic mountain scenery at the edge of the Highlands. From the mountains and their approaches within the Highland areas the Proposal would be an alien intrusion into the natural beauty and be incongruous in the wild land. Within Glen Lednock itself the proposal would become the new domineering feature in a previously unspoilt glen. These effects are far from localised. They affect national designated landscapes and adversely impact the visual amenity which has iconic status.

6.17 This analysis has reviewed the effects of the turbines, but there are other aspects of the Proposal which also require consideration. The LVIA describes the Access Route and claims to assess the landscape and visual effect of it (6.6.6-13), concluding that the provision of the access route would be 'moderate'. Much of this is based on the LVIA's view that the Proposal "*uses existing track where possible*" (6.5.7). They observe that *"ground level construction activity would be unlikely to be readily discernible"* (6.6.25). Little mention is made of the new routes sections. However, there is no recognition that the 'existing access tracks' are physically unsuitable for abnormal loads and the construction traffic they are intended to carry. At present these tracks carry only occasional very light footprint small vehicles. To make the existing tracks useable for the Proposal these tracks require considerable re-engineering. They need substantial widening, major re-profiling to ease gradients, complete re-grading to provide a sound base to carry many extremely long heavy vehicles [21] and large drainage channels added to the sides as well as provision for run off such as swales and soak aways. The new roadway is likely to be some 10m wide and also require adjoining ground level works, which in areas needs to be extensive. These are substantial undertakings which would fundamentally change the character of the

[21] Typically, around 100m in length.

existing tracks and the surrounding area. New tracks need a similar standard. It is not by accident that the Applicant has provided a Site boundary for the Access Route which is typically 170m-200m wide. This extent would be needed for the re-engineering of the existing tracks and building the new construction roadway.

6.18 Whilst identifying the intended Access Route the Applicant has not provided engineering details of the works required to construct the route. The Access Route requires: substantial upgrade to the existing tracks [22]; significant upgrade of sections of the public highway; and the building of new parts of the proposed access roadway. Without knowledge of the details of the works involved it is not possible for the Applicant's Landscape Architect to assess the landscape and visual effects of the Access roadway. The ground works could extent up to 200m from the chosen path. The effect of the Access roadway construction would lead to major scaring of the landscape (some of which lies in the LLA). Whilst parts of this might 'green-over' after a few years, the landscape would be permanently left with the distinctive form of a roadway, which dissects an otherwise natural unspoilt landscape. The visual impact would be a permanent scarring of the area with visibility across much of the Glen. The new roadway would be a major disfigurement to an otherwise unspoilt natural rugged scene.

6.19 The LVIA give great emphasis to 'embedded mitigation' (6.5) and list various factors it claims have provided mitigation (6.5.7). However, this is not in practice mitigation. If anything, it is a tacit admission the industrial scale wind turbines are unmitigable in the existing wild mountainous natural landscape. Despite the Applicant's spurious claims, the facts remain that the Proposal would change an unspoiled iconic landscape into another industrial site, again demonstrating that humans dominate nature.

6.20 Night light in a wild area would destroy the night wildness and introduce light pollution. Whilst recreational receptors would be expected to have left the Glen and wild summits at night-time the turbines would be visible from Strathearn, parts of the Loch Tay valley and elsewhere. At present, unspoilt by industrial development on the mountains no incongruous lights are seen. The Proposal would introduce quite strong permanently-on artificial light. Given the darkness of the surroundings these would look entirely alien. To suggest that there is *"no significant night-time effects"* and that the any effect is *"localised"* (6 p2) is an odd interpretation of the baseline circumstances and not in alignment with a reasonable assessment.

[22] That also does not take account of the fact that some of the 'existing tracks' are barely visible and it extremely generous even to describe them as 'existing'.

OTHER ASSESSMENT CRITERIA

6.21 As well as landscape and visual impact and effects, the Policy set out above requires consideration of other factors as well. These include other potential adverse effects, net economic impact and potential contributions to renewable energy and carbon emission reduction targets. The factors are assessed here, in that order.

6.22 The Applicant sets out their assessment of the 'socio-economics, tourism and recreation' effects of the Proposal in EIA Chapter 14. This lists various socio-economic benefits of the Proposal. Somewhat surprisingly, and considerably out of alignment with the figures for similar developments elsewhere in Scotland, the Applicant claims the Proposal would create "*38 operational jobs at the Perth and Kinross level*" (EIA 14.5.22). This figure, of 38 jobs, which are presumed to be full time equivalent jobs, is apparently produced from "*proxies*". The figures reflect a lack of experience of the operation of wind farms in Scotland, where it is normal for no local employment requirement and sites are controlled remotely. Maintenance, on the infrequent occasions it occurs, is undertaken by peripatetic specialist, who maybe UK or European based. Overall, the Applicant's claims in regard '38 jobs' are not credible.

6.23 In respect to other aspect of the Applicant's socio-economic assessment it is interesting that they conclude: there would be "*no significant negative effects on the tourism industry or recreational assets*" (14.5.56); and that core paths and 'a number of other popular routes' "*are not expected to be adversely affected by the Proposed Development*" (14.8.2). It is unclear whether the Chapter's author were aware that the construction would result in the Monument Road and other points of access to Glen Lednock being closed for many months. Such lengthy closures together with two years of disruption are significant. There is no awareness of the potential impact of the permanent large scale landscape character change on the Glen and the removal of the areas current attractiveness of its wild natural nature.

6.24 There is no consideration of the impact on local business of the severe disruption of the area during construction, which must adversely impact those affected. Nor is there any recognition of the potential loss to the high value tourism businesses in the area such as Gleneagles. The Applicant's socio-economic assessment is highly selective and partial. It cannot be relied on for a balanced assessment.

6.25 The proposed GLWF access track passes through two Sites of Special Scientific Interest (SSSI). Given the major engineering works required for the access roadway the Proposal must result in major damage to the SSSIs.

Potential Contribution to Targets

6.26 When weighing the merits of any proposal, Policy, both the NPPF and the LDP, requires consideration of the potential contribution any proposal might make to meeting renewable energy generation and reducing emission targets. In relation to the potential contribution that this Proposal could make to these targets, that is in grave doubt.

6.27 Scottish Government targets for onshore wind capacity for 2030 is 20GW. There are also 2030 and 2035 targets, set by the UK Government, for onshore wind in Scotland, 20.5GW and 21.2GW respectively. However, as the Applicant confirms, the earliest grid connection available for the Proposal is November 2031 (PS 1.1.3). Therefore, the Proposal cannot make a contribution to either of the 2030 targets.

6.28 Under Connection Reform, all offers for new grid connections are currently being reviewed by the National Electricity System Operator (NESO), including for this Proposal. That review would take account of whether there is need for the capacity of the Proposal in this region. Given the surfeit of onshore wind farm developments in Scotland (see above sections 4.18-4.23 and 5.15), it is extremely likely that the Proposal's grid connection offer would effectively be cancelled. In any event, as the assessment here shows, there is no need for the Proposal to make a contribution to the targets [23].

6.29 It is also notable that the Applicant accepts that there is effectively no need for this Proposal to be awarded consent at this time. At PS 3.3.1 they state construction would commence in 2029. The consequent question is why is the Applicant seeking consent now, several years ahead of construction. The answer most probably lies in the Connection Reform process currently by carried out by NESO, Ofgem and the UK Government. Due to problems with the grid connection process and the considerable excess of new generation seeking to connect to the electricity grid [24], major Connection Reform is taking place. Even to be able to find a place in the queue for a grid connection, wind farm developers have to lodge an application or show other measures that their project is ready to move forward. With a start date in 2029 realistically this Application is premature.

6.30 The Applicant's Planning Statement, at 5.3.11-13, refers to the UK Government's Clean Power 2030 Action Plan (CP30), published December 2024. The Planning Statement

[23] It is noted that the Applicant claims that "*the contracted grid connection date for the Proposed Development could be accelerated*" (PS1.1.4). This statement is misleading and misrepresents the real situation for this Proposal in relation to Connection Reform.

[24] Which currently stands are four times the requirement to for a fully Net Zero energy system.

mentions the UK Government's objective of 27-29GW of onshore wind capacity being operational within the UK by 2030. The Applicant's statements in respect to CP30 are extremely misleading.

6.31 As set out above, Scotland already has a clean power electricity system. The clear emphasis of the new UK Government has been to facilitate and encourage onshore wind energy in England, where there has been, until the new Government, a de facto embargo on development. The Government recognises that it would take time for onshore wind energy industry to re-commence development In England, but it is not saying that capacity in Scotland is a substitute for this.

6.32 What the Applicant curiously completely ignores [25], in their summary of CP30, is that for the first time the UK Government has set policy which allocates target volumes of the required renewable energy capacity by nation and regions. The onshore wind energy capacity, set by the UK Government, for Scotland in 2030 is 20.5GW and in 2035 is 21.2GW. That is an increase for Scotland between 2030 and 2035 of merely 0.7GW, or 3.4%. For England and Wales, the 2030 target is 8.6GW and 2035 is 15.8GW. A 2030 to 2035 increase of 7.2GW, or 84%. The new onshore wind CP30 capacities require consents to be awarded in England and Wales, not Scotland as claimed or implied by the Applicant. As stated above and shown in Table 1 (below) Scotland already has sufficient onshore wind capacity to meet both the 2030 and 2035 targets set by the UK Government.

6.33 Table 1 shows the current: a) operating and under construction capacity; b) the capacity of consents already awarded and awaiting construction; and c) the capacity for live applications; together with the Pipeline Total; the CP30 2030 and 2035 target onshore wind capacity; and the shortfall or surplus capacity. These figures are presented for Scotland; England & Wales; and Great Britain.

6.34 The figures in Table 1 do not take account of increased wind farm capacity from repowering. As discussed above, for Scotland including this would take the pipeline well past the Scottish Government's 20GW ambition without the need for any further consents. Adding repowering to the existing consented capacity would also more than surpass the CP30 requirement for 2035, for Scotland.

[25] Because these facts run contrary to the interests of the Applicant.

Table 1: Onshore Wind Pipeline Capacity and CP30 Targets			
Onshore Wind Pipeline, CP30 Targets and Comparisons.	Scotland	England & Wales	Great Britain
a) Operating and under construction	11.1 GW	4.1 GW	15.2GW
b) Consented, awaiting construction	8.9 GW	0.5 GW	9.4 GW
c) Applications	8.8 GW	0.8 GW	9.6 GW
Pipeline Total (a + b + c)	**28.8 GW**	**5.4 GW**	**34.2 GW**
CP30 2030 target	20.5 GW	8.6 GW	29.0 GW
Pipeline compared to 2030 target	8.3 GW	-2.9 GW	5.2 GW
CP30 2035 target	21.2 GW	15.8 GW	37.0 GW
Pipeline compared to 2035 target	7.6 GW	-10.1 GW	-2.8 GW

Source: DESNZ Renewable Energy Planning Database (April 2025) and CP30.
NB. Both the 0.5GW shortfall between the Scottish 20.5 GW 2030 target and the current operating, under construction 20GW, and the 1.2 GW shortfall between the Scottish 21.2 GW 2035 target and the current operating, under construction 20GW, can be met by repowering.

6.35 As Table 1 shows the need for all further onshore wind consents, to deliver the CP30 targets, is **only in England and Wales**. The CP30 target figures for Scotland essentially recognise the existing onshore wind energy pipeline, of projects operating, being built or waiting to be built. This is the total consented Scottish capacity. Table 1 demonstrates that no further consent need to be awarded for new onshore wind farms in Scotland. The CP30 target can be achieved without any of the current applications on new sites being awarded consent. Consequently, **there is no need to award consent for the proposed Glen Lednock Wind Farm** or indeed any other application for new onshore wind farms on a virgin site in Scotland, to achieve the CP30 targets.

6.36 If anything, what the CP30 targets tell us is that the UK Government want onshore wind developers to switch their focus. Rather than making s.36 Applications in Scotland, they should concentrate their efforts on developing wind farms in England.

6.37 This preference can also be seen in the change that the UK Government is making through its REMA reforms. Whilst the UK Government has decided against zonal pricing and will use Reformed National Pricing instead, it is clear that it wishes to address the regional imbalance of renewable electricity generation. Contrary to the Governments objectives and to an efficient energy system, if consented and built, this Proposal would only accentuate, rather than reduce, the regional imbalance.

6.38 The consequence of this would be highlighted in consideration of NPF4 Policy 11(c) in regard the 'maximising net economic impacts'. This Policy says low carbon 'development proposals would only be supported where they maximise net economic impact'. As it is far from locations where electricity is needed, the Proposal in this location would only increase cost to consumers without benefit. At present, due to the considerable excess of wind energy development in Scotland, beyond indigenous consumption and transmission capacity, much wind energy in Scotland is wasted. This excess capacity is curtailed or turned off because it cannot be used. Since generators are compensated for this loss of energy use, the cost of this surplus generating capacity falls on consumers. The result is a considerable negative net economic impact.

6.39 This Proposal, if consented and built, would increase this cost to consumers for no public economic benefit. The Applicant's 'net economic impact' assessment does not take this into account. Generally, the Applicant's claims in respect to net economic impact are unsubstantiated. Accordingly, the Applicant has not shown that the Proposal would maximise net economic impact.

6.40 The Applicant states that the Proposal would have 117.8MW of wind energy generation capacity [26]. However, as set out above, Scotland already has sufficient consents to achieve the 20GW ambition. There is no need for further onshore wind farm consents. Scotland also already has sufficient capacity, consented and through repowering, to achieve the CP30 2030 and 2035 onshore wind energy targets.

6.41 Consequently, further award of consents for new onshore wind farms is not needed in Scotland. The emphasis and priority now is for the wind energy development industry to build wind farms on the sites where consent has already been awarded. That responsibility, for delivering the 20GW ambitions, rests with industry to fulfil the promise it has made. In respect to new consents there is no need to award consents on new virgin sites, which would introduce major landscape change and intrusive visual impact to areas which are currently free from industrialised development.

6.42 Without any usable renewable electricity generation from the development the Proposal would not make a positive contribution to carbon emission reduction targets. Since the development would result in carbon emissions, from manufacturing the turbines and the release of carbon from peat during construction, the development would result in an increase in carbon emissions.

[26] Planning Statement, p1.

Due Consideration of Environmental Effects

6.43 The Applicant identifies the Proposal as being an "EIA development" (PS p1). As such, before a determination can be made on the Proposal, there is a requirement to consider and 'identify the significant environmental effects' arising from the Proposal or project [27]. Without due consideration the potential significant environmental effects of the Proposal might be missed.

6.44 It is noted that in submitting the Application and preparing the EIA the Applicant has prepared only a "*preliminary site access design*" (EIA Chpt. 3, 3.4.4). In other words, the Applicant has not, at the present time, prepared the design for the Site access. The information presented by the Applicant suggest they know where they would like the access route to be, but they have not prepared an engineering requirement for the necessary works.

6.45 It is also evident that, in having only a 'preliminary' site access arrangements, the quantum of material required for the access's construction is unknown. Nor do they know the detailed implications and potential environmental effects arising from the access route. The Applicant fails to state how wide the site access would be. Casual assessment of the profile of the Applicant's 'preliminary' access track, which can be described as tortuous, also shows that in sections the gradient is exceptionally challenging. It is therefore unsurprising that the Applicant has provided an exceptionally large Site boundary buffer around the access track. In places up to 250m and typically 200m wide. Whilst not made transparent by the Applicant, this obviously seeks to provide for the very extensive ground works that would be required to achieve a roadway viable for abnormal loads to pass on. Consequently, the construction traffic requirement, particularly for materials, cannot be known. Hence this uncertainty must affect the reliability of the traffic assessment.

6.46 The proposed Site access consists of 13km of new or substantially upgraded existing tracks and public highways. This Applicant's route: passes through two Sites of Special Scientific Interest; goes over 2.3km of ground current covered by reasonably deep peat; passes close to listed buildings; incorporates protected woodland; includes several new water crossings; as well as affecting several core paths and public rights of way. Without a detail assessment of the 13km long Site access the environmental impacts of the development cannot be known. This is a deficiency in the EIA.

[27] The Town and Country Planning (Environmental Impact Assessment)(Scotland) Regulations 2017, the supporting Guidance (such as Circular 2017/1) and relevant caselaw refer to 'EIA Developments' as 'projects'.

6.47 The Applicant also states that the "*Construction Traffic Management Plan would define any specific construction traffic that may continue to use Monument Road*" (3.4.8). in plain terms, the Applicant is not clear what the use of Monument Road by 'construction traffic' would be in the current Application and EIA.

6.48 The Applicant also refers to public "*road closure*" (EIA 11.6.51). They also refer to a public car park at Invergeldie "*would remain open as far as possible*" (author emphasis)(11.6.52). The Applicant also infers direct impacts on public rights of way core paths and active travel routes (11.6.46-50). While these closures and restrictions are caveated with good intentions to minimise impact, in real terms the level of closures and restrictions and therefore the environmental significance of the impacts, has not been assessed within the EIA.

6.49 Consequently, the EIA has failed to meet the necessary standard of identifying the significant effects of the Proposal. The Applicant cannot be clear on the effects arising from the Proposal. The Applicant's Chapter 18 – summary of Significant effects cannot be relied upon. That may summarise the applicant's view of the significant effects as far as they know them, at the present time. But this is insufficient for an 'appropriate assessment' of the 'significant environmental effects' of the project, as is required under the EIA Regulations. The Applicant's EIA is not fit for purpose and is not a basis on which a determination of the Application can be made.

6.50 The Applicant also states (PS 3.1.7) that an overhead power line is required for the Proposal's grid connection. The Applicant states they expect a grid connection to the Killin Substation (PS 3.5.9). But no other details are given or considered. The Killin substation is some 13km from the Site. However, lying between the Site and the Killin Substation are parts of the Loch Lomond and Trossachs National Park and other designated protected landscape and woodland areas. Somewhat surprisingly the Applicant states that this connection is not included within this application. LDP Policy 33A requires the effects of this power line to be taken into account when the application is considered. As such, the Application and the EIA associated with it does not address all of the environmental effects arising from the project. It therefore fails to abide by the law in respect to the definition, for EIA purposes, of the project.

6.51 In respect to the grid connection, the lengthy Site access and the effects of the Proposal on public access the EIA is not sufficient to determine the Application.

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7 CONCLUSIONS

7.01 Determination of this s.36 and deemed planning permission Application has to be judged in the light of the terms of the Electricity Act, planning and energy policy and material planning considerations.

7.02 The Electricity Act requires consideration of:

> "*the desirability of preserving natural beauty, of conserving flora, fauna and geological or physiographical features of special interest and of protecting sites, buildings and objects of architectural, historic or archaeological interest*". And also, the developer *"shall do what he reasonably can to mitigate any effect which the proposals would have on the natural beauty of the countryside or on any such flora, fauna, features, sites, buildings or objects"*

7.03 From the foregoing in this Objection, it is clear that this Proposal would have considerable adverse effects on 'preserving natural beauty'. If built, these effects would not only arise on the Site itself but especially on the surrounding area within the Lednock Glen, across Strathearn and on the surrounding mountains and hills. Whilst the Site itself is not a protected landscape the area around the Site has many landscape protections including a National Park, National Scenic Area and several Local Landscape Areas. The area is a renowned landscape which is iconic for its natural beauty and wildness. It is this unspoilt 'natural beauty' that is the source of a high level of recreation use, for the local population and by those from the central belt of Scotland and beyond. The unspoilt natural beauty of the landscape is also the source of the areas tourism economy. This includes an extremely wide range of visitors, from nearby very high value Gleneagles to walkers, backpackers and wild campers. Unsurprisingly the local visitor businesses are very concerned about the development, since they appreciate their value is reliant upon 'preserving the natural beauty' of the area. The Proposal, if approved and built, would be a grave intrusion into this landscape. It would industrialise an area of iconic natural beauty. It would change the landscape from unspoilt to spoiled. It would remove the remote wildness of the Glen and the surrounding mountains. The Proposal does not 'preserve the natural beauty' of the area. Consequently, the Applicant has failed to fulfil its obligations under the Electricity Act.

7.04 The Regulations [28] state that 'EIA Development' cannot awarded consent until the environmental effects have been assessed and the potential significant environmental impacts identified. The Applicant's Environmental Impact Assessment (EIA) is deficient

[28] The Town and Country Planning (Environmental Impact Assessment)(Scotland) Regulations 2017.

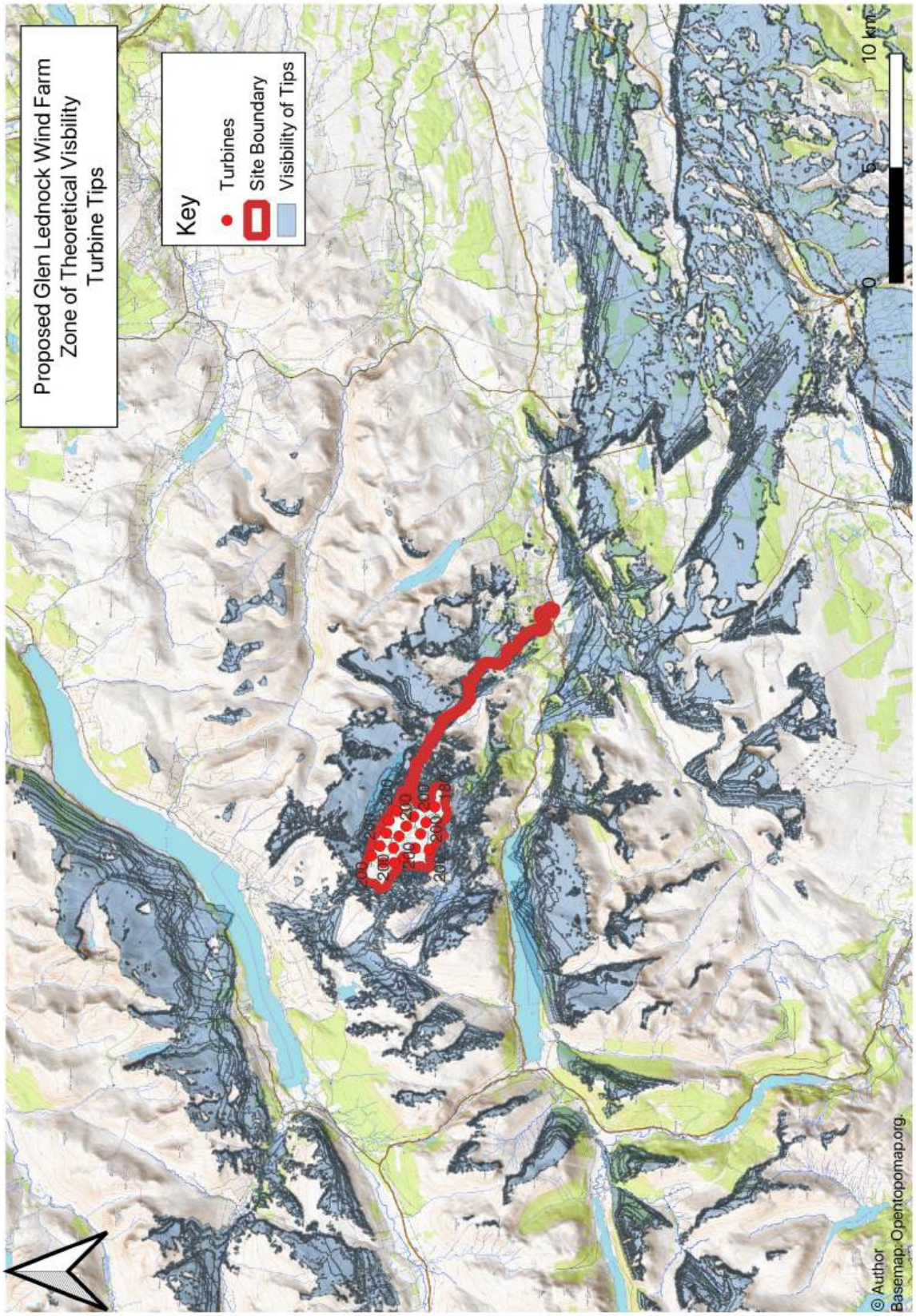
in several important respects. The EIA is insufficient in regard to the very lengthy Site access, the effects arising, the materials required for this and the consequent traffic requirement, the impact on Sites of Special Scientific Interest and the effect of sustained restrictions and closures of public access. The EIA also fails to consider the requirement for a grid connection, which appears would pass through a National Park and Local Landscape Areas. The grid connection is a functionally interdependent part of the Proposal. All of these effects are central to the substantive issue of whether the Proposal should be approved or not. Therefore, these are material matters which cannot be deferred for post determination consideration. Consequently, these shortcomings in the EIA require to be addressed and the full significant environmental impacts identified before the Proposal can be determined.

7.05 In respect to Planning Policy, it is evident that the Proposal does not accord with the Development Plan. The Proposal fails to meet the criteria set out in NPF4 and the LDP. The prime failure is in relation to adverse landscape and visual effects which are unavoidably well beyond 'local effects' and unmitigable. The Proposal also fails to meet the required criteria in relation to 'public access', on 'trees' and on 'communities'. The Applicant has not shown that the Proposal maximises 'net economic impact'. Any justifications for the Proposal in relation to contributing to renewable energy and emissions reductions targets are in grave doubt and unsubstantiated.

7.06 Accordingly, this Proposal should be refused consent.

CDF for SGL
August 2025

APPENDIX 1: Zone of Theoretical Visibility – Turbine Tips



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APPENDIX 2: Zone of Theoretical Visibility – Turbine Hubs