

OBJECTION TO PROPOSED GLEN LEDNOCK WIND FARM: REF ECU00004966

Objector details:

THE 'SAVE GLEN LEDNOCK' CAMPAIGN

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The 'Save Glen Lednock' campaign was formed in late June 2025. Our steering group is formed of individuals resident in Comrie and district: Martin Downing, Alastair Forsyth, Felicity Martin, Jen Newall, Katherine Simpson, David Spaven and Andrew Thompson. We will be making separate objections as individuals – this document provides the views of Save Glen Lednock as a group.

Please note that this is a **holding objection**, as we have commissioned a professional report on the proposal by Chris Ford of the Planwell consultancy. This will be completed and submitted to the ECU on our behalf by mid-August.

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Please note that throughout the text we have **boldened** phrases and sentences (i) where this has been done in the Low Carbon Environmental Impact Assessment Report (EIAR), particularly where we are directly quoting their words, and (ii) where we consider that our analysis / conclusions merit special emphasis.

1. A Flawed Consultation Process

The consultation process surrounding the Glen Lednock Wind Farm proposal has fallen significantly short of the transparency and engagement standards expected for a development of this scale, landscape impact, and complexity.

The short-term ‘effects’ and long-term ‘impacts’ are wide and deep, but objectors have been given only six weeks to digest and respond to 293 planning documents, many of them technical in nature and years in preparation. This is a disproportionate burden for members of the public, especially considering the scale of potential long-term impacts and the difficulty of accessing and interpreting large EIARs without professional expertise.

Despite the visual and environmental significance of the proposed development, **many local residents were unaware of the full scale or stage of the proposal** until very recently. This is likely to be particularly the case for the significant number of people who do not use social media. The developer should have sent a letter to every resident of Glen Lednock and Comrie, advising where scheme details could be examined and how representations could be made to the ECU. The developer should also have held consultations in Crieff, Methven and Gilmerton, which would be badly affected by the proposed turbine transport route.

Publicity about the proposal has been largely localised. Given the significant visual impacts for the many walkers and climbers visiting from the Central Belt, the requirement to advertise the application in only ‘one or more national newspapers on one occasion’ was likely to result in many affected individuals missing out on the consultation. In our opinion the consultation process **falls short of best practice guidance**. The Scottish Land Commission’s *Protocol for Community Engagement in Decisions Relating to Land* (2021)¹ and the *Scottish Government’s Principles for Responsible Investment in Natural Capital* (2024) both emphasise the importance of:

- **transparent early-stage engagement** with communities about land use change
- ensuring **benefits and risks are openly communicated**, especially where landowners or developers stand to gain from natural capital investments
- aligning consultation with **community wellbeing and long-term trust**

Notably, during an early “walk and talk” session held shortly after Oxygen Conservation’s acquisition of the Invergeldie Estate, community members were reportedly **assured that there were no plans for large-scale wind development**. It later became apparent that negotiations were already underway with their sister company, Low Carbon, for the proposal now under consultation. While not a formal planning breach, this **undermines public trust** and appears inconsistent with the spirit of both the Land Commission’s guidance and the Scottish Government’s stated ambitions for transparent, community-led land use.

For those who have found and viewed the photographic ‘visualisations’ in the Environmental Impact Assessment Report (EIAR), there is a major flaw in the presentation. None of the visualisations (printed and electronic) are proper representations of the visual impact – as they are all *static*, whereas the blades will be *moving*. NatureScot states in its guidance on wind farms:²

‘A visualisation can never show exactly what the wind farm will look like in reality due to factors such as: different lighting, weather and seasonal conditions which vary through time and the resolution of the image ... A static image cannot convey turbine movement, or flicker or reflection from the sun on the turbine blades as they move.’

¹ <https://www.landcommission.gov.scot/our-work/good-practice/community-engagement>

² <https://www.nature.scot/doc/visual-representation-wind-farms-guidance>

The recently-formed 'Save Glen Lednock' campaign (an entirely voluntary body) quickly accessed moving visualisations which give a proper representation of the visual impact of the spinning blades in Glen Lednock, from a variety of viewpoints. It is unclear why the developer – a large multi-national company – did not do so.

The EIAR presents visualisations from 43 viewpoints, but omits some key locations – notably from the upper levels of the B827 Langside road (the key access road to Comrie from the Central Belt), which currently provide a dramatic and unspoilt landscape 'gateway' to Strathearn and Highland Perthshire.

The language used in the application has in many cases underplayed the severity and extent of the various effects and impacts. To describe traffic increases on specific roads of 'between 60% and 90%' as 'moderate', and 'between 30% and 60%' as 'minor', would astonish most motorists. Another good (bad) example is the description of virtually all the impacts as 'localised' – yet the turbine blades would be visible from multiple locations up to 25 miles away (Ben Lomond), including the Rob Roy Way near Meall Odhar, Ben Lawers, Ben Ledi, Ben More, Ben Vorlich and Schiehallion. The developer has used language to distort reality.

Taken together, these factors point not just to technical limitations in the consultation process, but to a **wider failure of good-faith engagement**, particularly in relation to local transparency, inclusive access, and landscape-scale accountability. The consultation has not met the expectations of fairness and clarity that are vital for public participation in decisions about significant changes to Scotland's rural environments.

2. The National Policy Context

Introducing National Planning Framework 4 (NPF4), the Minister for Public Finance, Planning and Community Wealth states:

‘Changes to our places will not always be easy. People care about their neighbourhoods and rightly and reasonably expect that new development should improve their lives, rather than undermining what they value most. To help deliver on this strategy I am committed to involving a wider range of people in planning. A fairer and more inclusive planning system will ensure that everyone has an opportunity to shape their future so that our places work for all of us.’

So far, it is the experience of the local communities in Upper Strathearn from Crieff to St Fillans that the planning system has been far from ‘fairer and more inclusive’

In Part 1 of the Framework – A National Spatial Strategy for Scotland 2045 – the following are stated:

‘We will empower people to shape their places and ensure the transition to net zero is fair and inclusive.’

‘Our commitment to a just transition, means that our journey to a net zero society and nature recovery must involve, and be fair to, everyone’.

‘Scotland’s rich heritage, culture and outstanding environment are national assets which support our economy, identity, health and wellbeing.’

These powerful statements, which recognise the value of individual lives and the interests of those lives, should lie at the foundation of the application and delivery of individual policies embedded in NPF4. And these principles should remain at the forefront of any examination of the application of individual policy elements within NPF4 in determining whether the proposed development fits them.

Throughout our examination of the Glen Lednock Wind Farm proposal we have found many breaches of these principles and policy statements – and that is why we strongly oppose this misguided development proposal.

3. Landscape and visual impacts

Our assessment is that Low Carbon's Environmental Impact Assessment Report (EIAR) provided by the applicant understates the significance of the visual impact on the landscape, especially designated areas, in order to rate them as 'localised' and therefore acceptable under NPF4.

We believe that the Landscape and Visual Impact Assessment (LVIA) in the EIAR underplays how the proposed development will affect Loch Lomond and Trossachs National Park (LLTNP), River Earn National Scenic Area (NSA) and the Loch Rannoch and Glen Lyon NSA. We also believe that the effects will be more damaging than stated on the Wild Land Areas (WLAs) in the LVIA study area and on the host Landscape Character Types: 376 Summits and Plateaux – Tayside and 371 Mid Upland Glen.

Many residents of Comrie – us included – moved to upper Strathearn attracted by its beautiful rural landscapes and extensive opportunities for outdoor recreation. We are walkers, cyclists, hill runners, mountain bikers, climbers, wild swimmers, birders, photographers and wildlife lovers. We feel that the extraordinary qualities of our open spaces are threatened. Moreover we anticipate that the impacts of construction and the sight of remarkably tall turbines in this peaceful landscape will deter visitors and tourists to the area.

The proposed wind farm site on the upper west side of Glen Lednock stands on the southern edge of the Highlands, above the dramatic and highly scenic line of the Highland Boundary Fault, and would disrupt classic views of that major landscape feature from all around. As well as the site itself, the proposed 8-mile access road across beautiful land with steep, rugged slopes would create an intrusive scar on the landscape.

The 19 planned 180-200m turbines would be sited on ground at an altitude of 500-700m, giving a cumulative height of 680-900m. On the east side of Glen Lednock, the views from Ben Chonzie (931m, and a Munro) and Creag Uchdag (879m, and a Corbett) would be directly across to the turbines, which would appear almost as high as the viewer. The effect would be similar from Ben Lawers in Loch Rannoch and Glen Lyon NSA. From within the River Earn NSA, Mor Bheinn (640m), the highest of the Aberuchill hills, would actually look upwards to the turbines, many of which would be seen from base to blade tip, towering above Strathearn and standing directly in front of the view of the Lawers mountain range in Loch Rannoch and Glen Lyon NSA.

No visualisation is provided from Creag Uchdag, perhaps because the visual impact would be even greater than that from the Ben Chonzie, since it is closer to the proposed turbines. Instead much more distant Creag na Beinn has been chosen – on the same visual line but four miles further away. [Ben Chonzie, Ben Lawers and Mor Bheinn are included in the visualisations].

The area affected by this proposal is readily accessible from the Central Belt and is much loved and well visited by Strathearn locals, day visitors and tourists. The EIAR fails to provide visualisations from Comrie's two main tourist attractions: Auchingarrich Wildlife Park and Cultybraggan Camp, both of which would have distracting views of the turbines. Built as a World War II Prisoner of War camp, Cultybraggan contains many listed buildings, including the Guards' Block (now a museum) and numerous Nissan huts (a row of which are now self-catering holiday lets). Cultybraggan Camp is community owned and the income from visitors helps Comrie Development Trust maintain this heritage asset.

The proposal includes a hugely-damaging access road along the eastern side of Glen Lednock, as well as compounds and borrow pits that will disfigure the landscape. The open, middle section of the glen is one of the most scenic areas of Strathearn and the proposed access road would form a ugly scar all the way up the glen, visible from the road and the surrounding hills. Little attempt has made to explain how these features will be engineered into the landscape although there is the admission that, "There would be Long Term loss of

landscape elements including drystone walls, field boundaries, trees and hedges along the route of the proposed access road between the A85 and the Turbine Development Area”.

Overall, we consider that the 'Visual Receptor Groups' chosen for assessment in the EIAR are limited in how well they portray the impact of the proposed development.

When considering Residential Amenity, the access road is ignored in the EIAR, which states, “A 2km study area was agreed with consultees at Scoping for consideration of residential amenity. There are no residents in this study area and therefore a RVAA has not been included.” However, there are residents on the line of the proposed access road, including those in Balmuick, Balmuick Cottages and Carroglen (all 0.5km or less from the access route) and those living in upper Glen Lednock, where the road passing their front doors will need to be upgraded to take the construction traffic.

The Recreational Receptors identified as coinciding with the study area are very limited and ignore the fact that walkers, range much more widely over the landscape than sticking to defined routes such as the Rob Roy Way. It also ignores the heavy use of Glen Lednock by runners, mountain bikers and rock climbers. The developer describes virtually all the impacts as 'localised', yet the blades would be visible from multiple locations up to 25 miles away (Ben Lomond), including the Rob Roy Way near Meall Odhar, Ben Lawers, Ben Ledi, Ben More, Ben Vorlich and Schiehallion. These visual impacts cannot be 'mitigated'.

Likewise, the selection of Specific Viewpoints does not cover many of the finest views in the area, such as those from Bogton Braes, Little Hill, Beinn Dubh, Dunruchan Hill or the Linn on the Ruchill.

We note that in section 6.6 of the EIAR, that during construction and decommissioning most of the Landscape Effects are assessed as 'moderate with significant impact' on LCTs, while several of the Visual Effects are rated as 'major/moderate with significant impact', although these are downplayed in the Executive Summary.

Similarly, we would question the evaluation of Landscape and Visual effects during operation, as detailed in 6.7 and the conclusions reached in the Executive Summary. We agree there will 'large' effects for Mor Bheinn and Ben Chonzie, but would also rate the effects for Ben Vorlich and Ben Lawers as 'large' rather than 'moderate'. We therefore disagree with the Executive Summary that, “Overall there would be **no significant** effects on River Earn (Comrie to St Fillans) NSA, Loch Rannoch and Glen Lyon NSA or LLTNP. The integrity of the two NSA would not be compromised and the landscape objectives of LLTNP would not be compromised.” We believe that the proposed development is unacceptable in such an unspoilt area surrounded by protected sites, whose designations would be called into question because of the damaging visual impacts in Glen Lednock.

Our view is supported by the objection lodged with the ECU by LLTNP to the adjacent and contiguous Glentarken Wind Farm development – submitted by SSE to ECU for consent only a few weeks prior to Low Carbon presenting the Glen Lednock development for scrutiny and determination. In their Glentarken objection, LLTNP conclude that in respect of the LLTNP and the Glen Lyon NSA, there would be a significant effect on the objectives and overall integrity of the LLTNP and NSA designations. It is therefore clear that the Special Landscape Qualities (SLQs) of the National Park would be significantly adversely affected by the proposal and that the objective of the designation and overall integrity of the National Park would be compromised.

Existing wind farms in Highland Perthshire, such as Griffin and Drumderg, were more sensitively located, with turbines about half the height of those planned for Glen Lednock. The proposed site would place wind turbines much further west in Highland Perthshire than any previous schemes, with turbines that are more visible and out of proportion to the surrounding landscape.

In the EIAR, the cumulative assessment of Glen Lednock combined with other wind farms focused on effects arising from the addition of adjacent Glentarken, which is at the Application stage. These two projects are essentially one scheme when seen on a map and

would appear as a single wind farm of 31 turbines when viewed in the landscape. As people who know these landscapes well and who have explored them from all angles, we strongly disagree with the conclusion that the combination “would not lead to an increase in the level of significant impact reported for Glen Lednock with the operational baseline for the majority of landscape and visual receptors assessed and for SLQ of River Earn (Comrie to St Fillans) NSA, Loch Rannoch and Glen Lyon NSA or LLTNP. “

As NatureScot has commented in its official objection to the immediately adjacent Glentarken Wind Farm proposal, such wind farms would ‘adversely affect the perceived wildness of upland landscapes’ and ‘introduce an incongruous man-made element interrupting the synergy of the upland landscape’. It also notes the ‘easily accessible landscape splendour’, not far from major centres of population in the Central Belt:

‘Hills within Breadalbane such as Ben Vorlich ... are very well known and well visited. Large numbers of people visit the slopes and summits within Breadalbane to enjoy the scenic panoramas and experience the sense of expansiveness and space created by the nationally designated composition of hills, lochs, and receding layers of hills. The introduction of a large-scale wind farm into an upland area devoid of development of this nature would notably detract from the grandeur and splendour of the mountain landscape.’

NatureScot’s objection to the Glentarken proposal also highlights the ‘uncrowded places where there is a predominance of natural sounds and sights and a sense of peacefulness is enhanced by the small scale of human settlement within the expansive landforms, and by the general absence of large-scale development’, and concludes that the Glentarken proposal ‘would notably detract from the current sense of tranquility experienced from a number of key summits and the movement of blades would notably distract from these otherwise still landscapes’.

It would be surprising if NatureScot did not reach a similar – or even stronger – conclusion about the adjacent (and larger) Glen Lednock proposal, not least because of the **cumulative impact on the landscape** (31 turbines in total).

National Planning Framework 4 (NPF4) Policy 4 states that ‘Development proposals which by virtue of type, location or scale will have an unacceptable impact on the natural environment, will not be supported.’ We attest that this is the case with this application, which therefore should not be supported.

Policy 4 also notes that developments should only be supported if ‘development will not have significant adverse effects on the integrity of the area or the qualities for which it has been identified; or benefits of at least local importance.’ The proposed Glen Lednock Wind Farm would have significant adverse effects, and the benefits are highly speculative, with little or no longer-term local employment (see Section 6 below).

These visual impacts cannot be mitigated.

If other Perthshire wind farms that are at the Pre Application stage are also taken into account, the combined effects would be a wall of turbines marking the southern edge of the Highlands. These include:

- Meallbrodden Energy Park, east of Crieff (8 wind turbines with blade tips up to 200m high).
- North Logiealmond Wind Farm, above the Sma 'Glen on the A822 tourist route (20 turbines with blade tips up to 200m high).
- Meall Dearg Wind Farm, above the Amulree on the A822 tourist route (22 wind turbines with blade tips up to 250m high).

Our conclusion is that the Landscape and Visual Impact of the proposed Glen Lednock Wind Farm would cause a major loss in the value of this area, both in its own right and as a place overlooked by many designated and protected sites. The impacts would be widespread across a significant part of the north and east of the LLTNP (and its SLQs) together with the

adjacent NSAs and would therefore not be “localised”. It is therefore considered that the proposed development would not comply with NPF4 and should not be granted consent.

4. Geology, Hydrology and Hydrogeology

Access Road

The proposed access road through Glen Lednock is within 50 metres of the River Lednock and the Allt Mathaig burn at a number of points. A 50-metre watercourse buffer is a standard feature of wind farm design and appears to have been applied to the design of the proposed access road layout in the turbine area, but this is not so for a number of points on the proposed access road lower in Glen Lednock.

In their scoping response SEPA state that 'the site layout should be designed to minimise watercourse crossings and avoid other direct impacts on water features. The submission must include a map showing:

- (a) All proposed temporary or permanent infrastructure overlain with all lochs and watercourses.
- (b) A minimum buffer of 50m around each loch or watercourse. If this minimum buffer cannot be achieved each breach must be numbered on a plan with an associated photograph of the location, dimensions of the loch or watercourse and drawings of what is proposed in terms of engineering works. Measures should be put in place to protect any downstream sensitive receptors.'

There is a particular point where the proposed access road is immediately above the Allt-Mathaig on a steep slope and where significant earthworks will be required to build and stabilise the proposed access road.

The EIAR states that design mitigation and standard good practice would be used to mitigate the risk of pollution from sediment runoff and pollution from fuels and other materials and liquids during construction, and presumably during subsequent operation, however, there is no indication how this mitigation would be constructed in very close proximity to the water courses.

The EIAR highlights the risk of flooding along this section: 'Along the Access Route, the River Lednock, the Carroglen Burn and the Milton Burn are the sources of flood risk with areas of medium to high likelihood (SEPA 2025a). Generally, the flood risk is localised to the channel extent, however the area to the north of Cnoc na Sithe (236 mAOD) as well as the confluence point of Carroglen Burn and River Lednock shows a larger flood risk extent spilling onto the flood plain.'

The EIAR does not address the potential impact of flooding of the access road and the subsequent pollution that could occur to the river and further downstream.

Our conclusion is that the design of the proposed access road poses a significant risk to the watercourses, in particular the River Lednock, the Allt Mathaig Burn, and ultimately the River Earn. Indeed, for the proposed design of the access road there would appear to be no practical mitigation which would reduce these risks.

The pollution which would occur during the construction phase of the proposed access road, using the route and design proposed by Low Carbon, would inevitably result in significant sediment pollution into the water courses. Other pollution risks to the water courses during the construction and operation of the proposed access road would include fuel oil pollution. We consider that the potential for a serious pollution incident is very high and therefore the risks of significant damage to the ecology of the water courses is likely to be persistent and catastrophic. In practice this would mean significant and lasting damage to fish, amphibian, mammal and invertebrate populations of the water courses which will take years to fully recover from any such incident. Additionally, this pollution would have long-lasting economic impacts on the local tourism industry, and more widely.

Borrow Pits

The location of Borrow Pit BP1 on the new access track, directly above the river is a totally unsuitable location, with a similar risk of sediment run-off and pollution as to the road. We assume that this location has been targeted as it is a source of diorite, located on the proposed access road and just outwith the Funtulich Geological SSSI. Approximately 250,000t has been identified, presumably for the wearing course of the access road and tracks.

Borrow pits BP2, BP3 and BP4 are located above the Allt Mathaig burn, and there is a similar risk of pollution from these. It is understood that the intake on the burn, located downstream of BP3 and BP4, feeds the SSE power station at St Fillans and any silt or sediment would potentially enter the intake and tunnels supplying the power station.

In their scoping request, SEPA have specifically required the following information for each borrow pit:

‘(a) A map showing the location, size, depths and dimensions.’

‘(b) A map showing any stocks of rock, overburden, soils and temporary and permanent infrastructure including tracks, buildings, oil storage, pipes and drainage, overlain with all lochs and watercourses to a distance of 250m. You need to demonstrate that a site specific proportionate buffer can be achieved. On this map, a site-specific buffer must be drawn around each loch or watercourse proportionate to the depth of excavations and at least 10m from access tracks.’

‘(c) Sections and plans detailing how restoration will be progressed including the phasing, profiles, depths and types of material to be used.’

The EIAR includes very basic information meeting the requirements of point (a), but the information required in points (b) and (c) – that inform the consultee (and public) whether the applicant has any idea of how to operate a borrow pit – has been completely ignored.

Geological SSSIs

It is noted that in their scoping response, NatureScot have specifically requested that the EIAR should take into account any potential impacts on the protected features of the Fintulich SSSI. However, despite this, and the fact that the access road would be driven right through the centre of the two SSSIs with significant earthworks, the EIAR ignores this request.

The Craig More SSSI, located adjacent to the A85 access, is likely to be more seriously impacted due to the steep gradients requiring greater earthworks. It is typical of the quality of the EIAR that Section 3.4.5 states that the impacts on the Craig More SSSI are addressed in Chapter 7 (Geology etc) but that chapter then states that they have been scoped out - despite the scoping opinion from NatureScot.

5. Ornithology

The Environmental Impact Assessment Report (EIAR) by Low Carbon in support of their proposed development of a wind farm at Glen Lednock considers Important Ornithological Features (IOFs), each IOF refers to a particular species of bird. The report is focused on a relatively few species, a large proportion of which are raptors, and – on the whole – considers the broader range of avian species occurring in the areas that will be impacted by the development peripherally. The focus is very much on the impact of the wind turbines themselves. The impact of the building of access and the delivery and construction of the turbines is little evident in the EIAR. This is a very significant omission.

The proposed access road is eight miles long, considerable sections of this road are across undisturbed and peaceful countryside. The physical disturbance of the land will be at least 8 metres wide, in some places wider. Complete habitat destruction will occur along significant sections of this road. Even though in sections this road already exists, it is presently just 3 metres wide. Noise and vibration will be very detrimental to a range of bird species during both the construction phase and the subsequent usage of this road.

Table 1. A selection of bird species likely to be detrimentally impacted by the building and operation of the proposed roadway and wind turbines that are not highlighted in the Low Carbon EIAR for Ornithology, Chapter 8.

Species	UK Listed	Breeding roadway	Breeding turbine site	Current UK status	UK population decline data 1995-2022 (BBS)
Tawny Owl	Amber	Yes	No	Declining	-41.6%
Cuckoo	Red	Yes	No	Declining	-34.9%
House Martin	Red	Yes	No	Declining	-43.8%
Grey Wagtail	Red	Yes	No	Declining	-11.8% but -12.5% 2017-2022
Dipper	Amber	Yes	No	Declining	-49.7%
Whinchat	Red	Yes	No	Declining	-60.0%
Wheatear	Amber	Yes	No	Declining	-31.7%
Mistle Thrush	Red	Yes	No	Declining	-35.7%
Spotted Flycatcher	Red	Yes	No	Declining	-67.5%
Chaffinch	Green	Yes	No	Declining	-31.9%

(BBS) = British Trust for Ornithology Breeding Bird Survey.

Any loss of breeding pairs of the bird species in Table 1 should be avoided due to the overall decline in their numbers across the UK. The impact on local populations for some of these species may be significant.

In our opinion the impacts on the above species were not properly considered within EIAR Chapter 8 Ornithology despite the proposed development impacting on the local populations through significant habitat destruction and disturbance over more than two breeding seasons. This is a reason for considering EIAR Chapter 8 flawed and failing to provide a

proper assessment of the negative impacts of the proposed Glen Lednock Wind Farm on local bird populations.

Bird species designated IOF by Low Carbon in their EIAR include iconic and important species for Scotland in general and the Highlands in particular. One of these species, Golden Eagle, although UK green listed, has cultural and heritage significance. Whilst the predicted losses of individual eagles to collisions with turbines may be considered inconsequential in relation to the overall Scottish and Perthshire populations, as noted in Chapter 8 of the EIAR the implications of the loss of individual birds is not fully evaluated other than as a numerical and population item. Most country and Highland loving people would consider the loss of one Golden Eagle to a development such as this proposed wind farm as unacceptable. The estimated collision rate with this proposed development is one collision every 2.9 years. A collision effectively equals an eagle death. Over the 40 year life span of this wind farm development, Low Carbon, from their own analysis, estimate there will be approximately 12 Golden Eagle fatalities (Appendix A8.3 2.1.13 Table 3.). Table 5 estimates a rate of 0.341 collisions of Golden Eagles with turbines per year.

Considerable time, effort and finance has been applied to the re-introduction programmes for both Red Kite and for White-tailed Eagle. Both these species have successful and growing populations in Highland Perthshire. These species are both of interest to locals and to visitors to the county. Both these species have an economic value locally as tourist "attractions", this is particularly so for Red Kite. Over the lifetime of the wind farm, estimated by Low Carbon at 40 years, the same modelling used for Golden Eagles was also applied to these two species. The estimate for these species are approximately 18 fatalities of White-tailed Eagle over the 40 year estimated life of the wind farm and for Red Kite it is a shocking 112 fatalities.

The above figures for Golden Eagle, White-tailed Eagle and Red Kite are considered inconsequential because they are estimated to have no detrimental impact on the overall populations of these species according to the Low Carbon EIAR. However, put these figures into the context of an individual sporting estate over the same time period and there would be considerable public outcry and official investigation.

Golden Eagles are particularly sensitive to disturbance and this is recognised by Low Carbon in the EIAR. There is sound evidence that Golden Eagles avoid areas with wind turbines, indeed Low Carbon mention research indicating this within their own documentation. Whilst the loss of the hunting area for eagles is not greatly diminished by these particular turbines, the cumulative impact of more wind farms in the Highlands may have implications in the longer term for species like Golden Eagle which are currently holding their own.

If the gateway development in Glen Lednock, along with the Glentarken wind farm are given the go-ahead there is, in our opinion, likely to be a cumulative negative impact on the Golden Eagle population, especially if further wind farm developments occur in the region. Low Carbon attempt to address this issue in 8.8 of the EIAR. In our opinion the conclusions drawn in the EIAR that the cumulative impacts on the wider Golden Eagle population will have no significant cumulative effect are speculative and based on modelling that is quantitative rather than qualitative 8.8.8 Nature Scot (2012). Whilst we congratulate Low Carbon on attempting this analysis, we believe it has little real value in determining the future population dynamics of a sensitive and iconic species, Golden Eagle, in our region, were this and further wind farms constructed.

For the ornithological reasons given above we object strongly to the development of a Glen Lednock Wind Farm.

6. Ecology

Low Carbon's Environmental Impact Assessment Report (EIAR) for Ecology (Chapter 9) identifies habitat types and locations at risk due to the development of the proposed Glen Lednock Wind Farm and its proposed access road. The EIAR is thorough in its assessment of plant communities and the mammal species that would be impacted if this proposed development proceeds. Consideration of impacts on local reptile and amphibian communities are less convincing, particularly along the proposed access road which would cause habitat fragmentation and direct damage to habitats for these species.

The EIAR for Ecology is inadequate in its assessment of impacts on invertebrate communities. With regard to invertebrates, the EIAR states in 9.6.19 that "a wide range of terrestrial and aquatic invertebrates are considered likely to be present across the site and the wider landscape, some of which may receive a higher level of protection on the Wildlife and Countryside Act 1981 (as amended) or be listed on the SBL or LBAP. There is widespread suitable habitat for these species in the wider landscape; therefore, impacts on invertebrate species are considered to be non-significant. Invertebrate species are not considered further in the assessment."

This above statement is ecologically inaccurate. More likely is that invertebrate species "are considered to be non-significant" because the assessment would be very time-consuming and required expertise that was unavailable to the surveyor.

The other mention of invertebrates in the EIAR would appear to support this conclusion. The only three invertebrate species mentioned are in 9.4.81 where it is stated, "The Turbine Development Area contains habitats suitable for notable terrestrial invertebrates, including large heath (*Coenonympha tullia*), mountain ringlet (*Erebia epiphron*), and pearl-bordered fritillary (*Boloria euphrosyne*). Widespread grassland, wet heath, and associated food plants could provide breeding and foraging opportunities and therefore there is potential for these species to be present."

This second statement reveals an ignorance of the habitat requirements for Pearl-bordered Fritillary which does occur around the River Lednock catchment, potentially on the route of, and at least within 50 metres of, the proposed access road where there is suitable habitat for this species. Data within the National Biodiversity Network database supports this supposition. Pearl-bordered Fritillary does not have breeding habitat in the Turbine Development Area.

The three butterfly species are listed in the UK Biodiversity Action Plan as species requiring conservation action.

Our own survey work along the proposed access road revealed the presence of Violet Oil-beetle *Meloe violaceus*. This species, like the three butterfly species mentioned above, was listed in NatureScot's Biodiversity Species List and is listed in the UK Biodiversity Action Plan as a species requiring conservation action. This species has specific habitat requirements which are not "widespread... in the wider landscape". Our assessment is that the proposed access roadway, if built, would destroy and fragment the available habitat for this species, as its habitat, and those of its required hosts, is directly on the route of the proposed access roadway along the verges of the existing road through upper Glen Lednock.

Table 9.5. Summary of NVC habitat communities recorded during survey of the Turbine Development Area lists #17 M19 *Calluna vulgaris* - *Eriophorum vaginatum* blanket mire as occupying 48.33% (437.59ha) of the area within the survey boundary of the Turbine Development Area. This is a blanket mire habitat listed as, "Priority peatland communities where impacts have the potential to raise issues of national importance." Nineteen large turbines, and four miles of roadway are proposed for the Turbine Development Area and there is no doubt that will result in significant damage, both in gross area and habitat fragmentation, to this nationally important National Vegetation Classification habitat type in the Turbine Development Area. This damage would be permanent and irreversible.

The construction of the proposed access roadway would be unacceptably close to the River Lednock and the Alt-Mathaig burn at a number of locations, within 10 metres. Due to the topography of the land and the need to build the roadway to a minimum of 5 metres wide, with habitat destruction extending to at least 8 metres to include the required drainage and earthworks, pollution incidents to the water course would seem to be unavoidable. Most pollution is likely to be of particulate materials, but fuel oil and other pollutants could also be involved. The impact on the invertebrate and fish populations of the water course would be damaging at least, catastrophic at worst. These impacts would not necessarily be localised and could impact downstream to the River Earn where Atlantic Salmon *Salmo salar* in various life stages are present

7. Noise and Vibration

The main access route is planned to pass very close to properties between Funtulich and Invergeldie. During construction residents would be subject to significant levels of construction noise and vibration. These impacts are assessed in EIAR Chapter 10, Noise and Vibration. We have identified several shortcomings in this assessment that question its credibility.

The assessment undertakes a construction noise assessment for the creation of the access roads. This predicts construction noise levels based on modelling using only three pieces of plant: a 35t bulldozer; a 9t vibratory roller and a 7t excavator. Expert engineering opinion available to us asserts that this is a severe under-estimation of the number, type and size of plant required - a 35t excavator, possibly with a breaker, articulated dumptrucks and a larger roller are what is likely, all with much higher sound levels. Even the vibration assessment (in the same chapter) uses data from an 18t vibratory roller for the modelling.

The noise modelling is therefore questionable, but as it is, the predicted sound levels are significantly in excess of the 65dB threshold. Despite this, the suggested mitigation is even more astonishing: 'It is considered that prior notification to occupiers of nearby properties represented by the representative noise sensitive receptors of when construction traffic noise levels will be relatively high and how they will change over the duration of the construction period would reduce the magnitude of construction traffic noise impact'

Dust pollution and nuisance

In addition to the noise and vibration, the properties located metres from the access road would be subject to dust pollution and nuisance. The IEMA guidance states that it is essential to identify the number of properties likely to be affected by dust, yet dust from the construction works has not been addressed.

The vibration impact assessment only takes account of ground borne vibration from the vibratory roller. No assessment has been made of any other ground or airborne vibration from rock breaking, blasting (potentially required due to the strength of the rock) or other heavy plant that is likely to be required for road construction very close to the residential properties at Invergeldie and at Fordie on the A85.

Seismic risks – Lednock reservoir dam

We can find no reference in the EIAR to any assessment of the potential risk of seismic disturbance which might be a trigger for earth tremors along the unstable fault line of the Highland Boundary Fault.

At its closest, the proposed construction route through Glen Mathaig passes approximately 500m below the SW end of the Glen Lednock reservoir Hydro Electric dam, managed and maintained by SSE Renewables.

The dam, of concrete construction, was built in 1957 to a high specification of a buttressed design in recognition of the potential disturbance of its integrity which might result from the frequent earth tremors which occur in the vicinity of Glen Lednock and Comrie (the 'Shaky Toon').

We believe that consultation with the owners and managers of the dam – SSE – should be evidenced in the report, and should inform inclusion of a risk assessment in the EIAR recognising the hazard, and covering the risk of damage to or failure of the dam due to triggering of seismic tremors during construction of the access road and turbine foundations.

The risk may be small, but **the earth tremor hazard must be recognised as extreme**, given that, in the event of sudden catastrophic failure of the dam, destruction of human and non-human communities would result, stretching from Glen Lednock to the confluence of the Earn with the Tay at Bridge of Earn. There would be much loss of human life. Communities

in Strathearn need reassurance that the hazard has been identified and the risk assessed, leading to confirmation that is very, very low.

8. Access, Traffic and Transport

Introduction

Access, traffic and transport are crucial aspects of the proposal. During the peak period of the construction programme (Month 7), it is forecast that an average total of 555 construction vehicle trips (including 392 lorries) will be made per day. ('Vehicle trips' are not specifically defined anywhere in the application, but we have assumed that this means single trips, not return trips.)

The application states that 'Throughout this chapter [11], the factual consequences of the Proposed Development and its construction and operation are referred to as 'effects', while the significance they are deemed to have on the baseline environment is referred to as 'impacts'.'

Contrary to the language of the application, we will argue that the various 'effects' of the construction transport will be far more severe than claimed. What are described as 'factual consequences' are in many cases subjective interpretations of outcomes, using phrasing which underplays the extent of the various effects through words such as 'low', 'medium' and 'negligible'.

Section 11.2.2 of the application states that 'The Proposed Development and its impacts were considered in the context of the National Planning Policy Framework 4 (NPF4) (Scottish Government 2023), which states that plans should 'protect people and places from environmental harm, mitigate risks arising from safety hazards and encourage, promote and facilitate development that improves health and wellbeing'. This establishes a test for the performance of the transport network by which development should be assessed.' We argue in particular that this proposal self-evidently does nothing to 'protect people and places from environmental harm' or to 'promote and facilitate development that improves health and wellbeing'.

Section 11.2.3 states that 'The design of the Proposed Development has ... attempted to minimise negative impacts on road safety and ensure that the needs of all road users are appropriately considered.' The developer may have 'attempted to minimise', but we will argue that the sheer volume of the projected new traffic (in particular HGVs) on Glen Lednock, the A85, the A822 and the B827 (the Langside road) makes this claim meaningless.

We note that Table 11.1 on 'Scoping' records that the response from ScotWays (the Scottish Rights of Way Society) 'notes that as well as direct impacts of development upon public access, they also have an interest in impacts on recreational amenity, so this includes the impact of wind farm development on the wider landscape. We anticipate that the applicant will take into account both recreational amenity and landscape impacts in developing their proposals for this site. We will consider these issues further should this scoping stage lead to a planning application.' The developer's reference to 'How Response has been Considered' states only that 'Comments noted. The assessment has considered the impacts on active travel and public rights of way (PROW) within this chapter. Further correspondence with ScotWays led to the purchase of mapped PROW within the vicinity of the Site.' There is no mention of the impact of wind farm development on the wider landscape in the developer's response.

Traffic impact magnitude – and omissions

The second table of Chapter 11 of the EIAR (see overleaf) illustrates the way in which language has been used to downplay impacts of the scheme:

Table 11.2: Traffic Impact Magnitude

<i>Magnitude of Impact</i>	<i>Percentage Increase in General Traffic</i>
<i>Major (significant)</i>	<i>Above 90%</i>
<i>Moderate (significant)</i>	<i>Between 60% and 90%</i>
<i>Minor (not significant)</i>	<i>Between 30% and 60%</i>
<i>Negligible (not significant)</i>	<i>Below 30%</i>

To describe traffic increases on specific roads of 'between 60% and 90%' as 'moderate' and 'between 30% and 60%' as 'minor' would astonish most motorists. The developer has used language to distort reality.

In Section 11.3.21 the developer states that 'The following environmental effects are addressed in this chapter in accordance with the IEMA guidelines: severance (of communities); driver delay; non-motorised user delay; non-motorised user amenity; fear and intimidation (of all non-motorised users); and road safety'. There is no mention anywhere in Chapter 11 of noise impacts or air pollution, other than this cursory reference in Section 11.6.60:

Direct and indirect impacts on traffic and active travel receptors may arise from construction disturbance, i.e., disruption to access, increased noise levels, air pollution, traffic congestion, change in amenity etc. Based on results the people most likely to experience the greatest levels of disruption during construction are residents of Crieff and Comrie, particularly Monument Road.

This is an astonishing omission, and indeed in the entire 18 chapters of the Main Report it is the only reference we have seen to air pollution.

Noise impacts from construction traffic are considered by the developer in Chapter 10 of the EIAR, but only in respect of Monument Road and the new access road. **There has been no assessment of construction traffic noise impacts on the A85 (including Comrie, Crieff and Methven), the A822 (including Muthill, Braco and Greenloaning, or the B827 (including Dalginross in south Comrie).**

In assessing effects / impacts on 'receptors', the EIAR defines the latter (in 11.4.33) as including the following: '▪ road network and the people using it, most importantly the emergency services, but also including those using public transport – potential delay, severance, and disruption impacts; ▪ pedestrians and cyclists on surrounding footways, paths and cycleways – potential delay, severance, and disruption impacts; ▪ residents – potential disruption due to local intrusion, dust, and dirt; ▪ local businesses and employees – potential disruption due to potential temporary road closures, local intrusion, dust, and dirt; ▪ construction vehicle drivers – potential safety concerns; and ▪ Perth and Kinross Council, Transport Scotland and/or their agents, and other landowners'.

The only receptor' location in or near Glen Lednock - as shown in Table 11.24 (under 'Receptor Sensitivity' etc) and in 10 subsequent tables – is Monument Road. The only reference to 'walkers' – as opposed to pedestrians – relates to the car park at Invergeldie. This chapter of the EIAR therefore has not dealt with the key issue of recreational walking, which we address in our Section 11 on Socio-economics, Tourism and Recreation.

Section 11.6.31 states that:

'Using the IEMA guidelines outlined in Section 11.3 (Fear and Intimidation), the change in magnitude of impact on the level of fear and intimidation experienced by all pedestrians, cyclist and other vulnerable road users during construction of the Proposed Development is **not significant**, as outlined in Table 11.28.'

Table 11.28 (Magnitude of Impact on Fear and Intimidation at Receptor Locations) then describes the impact on the A85 east of Comrie as 'Negligible'. Yet 11.14's 2029 Baseline

Traffic Count projection for that location forecasts a daily volume of just 30 HGVs (if the wind farm is not constructed), compared to the projected Month 7 HGV construction traffic averaging 252 vehicles per day – plus 140 LGVs (Large Goods Vehicles). **Will the average cyclist on the A85 regard their impact as ‘negligible’?**

Construction access routes

Proposed new access road

The new access road would run from a junction on the A85 (that has already been constructed, ostensibly for timber harvesting purposes) for eight miles to the wind farm site. It would follow some existing forestry tracks through the Fordie Estate, but these would need to be substantially upgraded. Beyond these, an entirely new road would be required past Balmuick and on to Funtulich, where it would join the existing public road to Invergeldie. From Invergeldie it would follow the SSE road up towards the west side of the reservoir.

The section between Funtulich and Balmuick would devastate an unspoilt part of the glen. It would destroy a tranquil path through fields and above the River Lednock that is thought by many to be one of the most beautiful and peaceful walks in Scotland.

Due to the size of the turbine components, the access road needs to be at least 5m wide, plus any verge and drainage ditches. In addition, due to the topography of the area, the road would require substantial earthworks (cut and fill) to obtain the necessary gradients, width and large radius curves. This would result in a scar all the way up the glen.

There are limited details of the proposed earthworks and those that have been provided are hidden away in the Technical Appendices of the application. No attempt has been made to provide a design drawing or realistic visualisation of the road so that its visual impact can be assessed.

It also noted that there is no Abnormal Load assessment or preliminary road design for the section of road from the A85 to beyond Carroglen.

Traffic Assessment

It is noted that no mention is made in the traffic assessment or the Abnormal Loads (AL) Assessment Report of site visits/fieldwork – the descriptions of the road infrastructure are vague, with no dimensions (e.g. ‘very narrow’) and there are no photographs. We therefore conclude that all work has been carried out using solely desk study and virtual information. Taking into account the complex nature of the route and the proposed use of minor roads, we consider that this is vital to the assessment. If the author of the application had actually walked up Monument Road, they would never have considered using it for virtually continuous HGV movements – having realised that it would be impractical, unsafe and likely to lead to the complete collapse of the structure of the road; let alone believing that the ‘theoretical two-way daily road capacity’ of the road is anywhere near 21,600 vehicles.

It is unclear as to how the extent of the study area has been determined, and it is noted that the assessment only considers the A85/A84 (to the west and south) and the A85 (east) as construction access routes. No consideration appears to have been made as to the source of materials and the most likely route to site. The A822 and/or the B827 are the most likely access routes from the Central Belt.

The Average Daily Construction Traffic movements have only been stated for selected months and stated as ‘Peak’. It is good practice to provide a construction traffic profile on a monthly basis over the full period of construction so that the extent of the peak can be identified and the nature of the loads/traffic routing can be analysed.

The assessment of traffic impact has been undertaken at the ATC locations (locations where traffic counts were made) and have been classified as being of ‘Low’ or ‘Negligible’ receptor sensitivity due to their rural location – apart from Monument Road, which has been incorrectly classified as ‘Moderate’ (see below). No account has been taken of the impact of

that same traffic as it passes through the village of Comrie (which should be 'Moderate' sensitivity), past Comrie Croft entrance and bus stop or the town of Crieff ('High' sensitivity). Monument Road has been categorised as being of 'Medium' receptor sensitivity, but it should be 'High'. In accordance with the IEMA guidelines (and Table 11.4 of their own report), where 'the road is a minor rural road, not constructed to accommodate frequent use by HGVs,' it is of 'High' sensitivity.

The IEMA guidance states: 'The competent traffic and movement expert should include any other link or location where it is felt specific environmental or population sensitivities may occur.' Although Fig. 11.4 identifies some sensitive receptors (although limited to the two routes east and west), no attempt has been made to assess their sensitivity or assess their impact from the construction traffic or abnormal load movements. This is particularly pertinent to Crieff, where normal HGV traffic is shown to travel through the town centre and abnormal loads past three schools, a sports centre and supermarkets.

Table 11.24 describes the 'Receptor Sensitivity' on the A85 east of Comrie as 'Low', yet Table 11.14's 2029 Baseline Traffic Count projection for that location forecasts a daily volume of just 30 HGVs (without the wind farm), compared with the projected Month 7 HGV construction traffic averaging 252 vehicles per day – plus 140 LGVs (Large Goods Vehicles). **This is a massive increase in lorry traffic – not a 'low' increase.**

Section 11.4.46 states that:

Table 11.17 details that cars make up the largest percentage of vehicles involved in collisions, at over two thirds, however, that percentage has decreased slightly over the last five years. Additionally, HGVs have only been involved in a small percentage of accidents at less than 5% during both periods. Even when LGVs are added, goods vehicles as a whole have been involved in less than 10% of accidents.

What the developer does not mention is that HGVs nationwide are disproportionately involved in *fatal* accidents, typically involving 10%-20% of such accidents, compared to their 5% share of overall traffic volumes. Table 11.24, 'Receptor Sensitivity', refers to locations 'A85, west of Crieff' and 'A85, east of Crieff', but there is *no reference to the sensitivity of Crieff town centre*, through which a significant proportion of construction traffic (other than turbine blades) would pass. This is a location where noise and air pollution effects on resident, shoppers, etc – as well as the other categories of environmental effects on road users which the developer does acknowledge – are likely to be serious.

The assessment also states that: 'No significant residual effects are anticipated for road users, access to public transport or access to outdoor areas, specifically Monument Road, during construction as a result of the Proposed Development.' But the impacts on the residents on Monument Road from the large numbers of HGV and LGV traffic passing their doors, due to, nuisance, noise, air pollution, road safety and intimidation, is far greater than the language used by the developer implies.

The assessment has ignored the traffic impacts of the residents at Invergeldie, who would not only suffer the effects of the road closure but also the full effect of all of the construction traffic for the duration of the construction period. This would include hundreds of lorries per day, together with abnormal loads passing close to their homes. The Invergeldie residents would effectively be living in a construction site.

The fact that the developer is proposing closing Monument Road to all but residents for up to eight months (but probably longer) suggests that they have little idea of the effect that would have on Comrie residents and for the many thousands of visitors to the glen every year.

The impact of the HGV traffic on the residents (including children) of Monument Road and visitors to the area who would not be able to walk or cycle into the village safely, and visitors wanting to access the area's beauty spots (as the road would be closed to their vehicles)

has been completely underestimated with regards to 'Fear' and 'Intimidation' in the application.

The IEMA guidance states that:

'While most of these factors can be quantified, there will be a need for judgement to be exercised in determining the degree of fear and intimidation. Special consideration should be given to areas where there are likely to be particular problems, such as high-speed sections of road, locations of turning points and accesses, and the inherent lack of protection created by factors such as a narrow pavement median, a narrow path or a constraint (such as a wall or fence) preventing people stepping further away from moving vehicles. In addition, locations where people may be unfamiliar with the locale (e.g. beauty spots or heritage/tourist attractions) need a judgement to be applied to determine the degree of impact. The movement of hazardous/large loads will heighten people's perception of fear and intimidation and, if this is likely to occur, it should be noted.'

No such judgment has been applied in the developer's application.

The assessment states that the construction would occur during 'normal' working hours (i.e. Monday to Friday: 07:00 to 19:00, and Saturday: 07:00 to 16:00, and then gives a long list of when exemptions may be required. This effectively means that working hours would be effectively 24 hours per day /7 days per week in order avoid delays to the project from weather, breakdowns etc.

The assessment states that 'A CTMP (Construction Traffic Management Plan) will be agreed, in consultation with the Planning and Roads authorities' post-consent ... Traffic management measures to minimise the impact of the construction phase of the Proposed Development on residents of Monument Road shall be a focus of the CTMP.' Taking into account the significant impact (and closure) on Monument Road and the movement of abnormal loads through urban areas and high sensitive locations, such as schools, we are astonished that an Outline CTMP has not been prepared as part of the traffic assessment. This would provide evidence that the applicant (and the consultant) had actually considered the impacts and how they could possibly be mitigated.

Abnormal Loads (ALs)

The abnormal loading routing along narrow lanes (Highlandman Loan), past primary and secondary schools (Broich Road – not assessed in any of the impact assessments) and close to Crieff town centre, is unacceptable. It involves significant tree lopping and felling, a number of overruns that require land purchase, and the requirement to locate a large site compound in which to transfer the blades from the Super Wing Carrier to the Blade Lifter.

The use of the Blade Lifter is limited to 5km/hour with the blade elevated, causing significant traffic delays and involving significant resources from Police Scotland. Many problems were encountered using the method when used for wind farm in the Borders some years ago, including cancellations due to high winds and breakdowns.

We note that the report is qualified with the paragraph stating that 'The abnormal load assessment has identified that the route from the Port of Rosyth to the site is technically feasible in terms of horizontal geometry, which is dependent upon third-party land agreements at several locations. It is noted that this report has focused on the horizontal alignment of the route.'

No AL assessment has been included in the report for the access road from the A85 to Carroglen. It is therefore not known what additional earthworks would be required to upgrade and construct this section or even whether the route is practicable.

It appears that the developer believes that the AL loads would pass over the narrow bridge on the Invergeldie Burn. Taking into account that the width between the bridge parapets may not actually have been measured, can it be proven that the ALs would in practice be able to

pass over the bridge? In addition, it is possible that the vertical alignment of the bridge is too great and it is unlikely that the weight capacity of the bridge is sufficient. It is a listed structure and, if used, is unlikely to survive the construction period.

The tree canopy assessment has been undertaken using NTM data, and is reliant on the accuracy of this data and the way in which the developer has interpreted it. The developer admits that the final requirements for tree trimming / removal would need to be confirmed on site by the turbine haulier prior to delivery. It is therefore likely that additional trees would require removal to accommodate the blade lifter. No habitat assessment or protected species surveys have been undertaken along the AL route so the impact of these works is unknown, resulting in further ecological impacts and delay to the project.

The 'Scotland onshore wind pipeline analysis 2024-2030' update, prepared by BVG Associates in November 2024 for the industry body Scottish Renewables, admits that the limited resources of Police Scotland is a significant constraint on the ability of the sector to meet the 2030 20GW onshore wind target. In the case of the Glen Lednock Wind Farm these limited resources would be tied up escorting abnormal loads on a highly convoluted and complex operation.

Conclusion

Contrary to the language of the application, we have identified that the various negative effects of the construction transport will be far more severe than claimed.

The developer has used phrasing which underplays the magnitude of these effects through words such as 'low', 'minor' and 'negligible'. Particularly egregious examples are:

- describing an increase of daily HGV volumes on the A85 east of Comrie (without the wind farm) from 30 per day to the projected Month 7 HGV construction traffic averaging 252 vehicles per day – plus 140 LGVs (Large Goods Vehicles) – as 'low'
- describing traffic increases on specific roads of 'between 60% and 90%' as 'moderate' and 'between 30% and 60%' as 'minor'

There have also been significant omissions in the developer's EIAR, notably:

- there has been no assessment of construction traffic noise impacts on the A85 (including Comrie, Crieff and Methven), the A822 (including Muthill, Braco and Greenloaning, or the B827 (including Dalginross in south Comrie)
- in the entire 18 chapters of the Main Report there is only one reference to air pollution.

From many of the developer's descriptions and conclusions we can only conclude that there has been little attempt to visualise the practical impact on Glen Lednock and Comrie residents by walking or cycling the key corridors involved. The fact that the developer is proposing closing Monument Road to all but Glen Lednock residents for up to eight months (but probably longer) suggests that they have little idea of the effect that would have on Comrie residents and for the many thousands of visitors to the glen every year.

Insofar as Access, Traffic and Transport are concerned, the developer has signally failed to make a coherent case for development, and we therefore object strongly to the proposed development.

9. Cultural Heritage

Context

The cultural heritage of Glen Lednock is part of the identity and psyche of the people of Strathearn and of Comrie in particular. Along with Glen Artney, it is their connection to the past, with remains going back as far as Neolithic or Bronze Age at sites such as Balmuick Stone Circle. Painted on the landscape is a picture of how their ancestors lived over the centuries. It is a reminder of a pre-industrial way of life that holds equal fascination for those not raised locally, who discover this heritage through their encounters with visible traces scattered across the glen.

Chapter 12 of the EIAR, Cultural Heritage, breaks this whole down into a series of numbered 'assets', dismissing their importance, although they are interconnected elements telling the story of our past. Itemising them like this allows the developers to dismiss individual 'assets' as Low Sensitivity, whereas it is as a collection that they are significant.

It is easy to get lost in the innumerable Tables, Figures and Appendices attached to this part of the report (if you can even find them). When one does plough through them, it becomes apparent that, by claiming that the effect on individual 'assets' is slight, each can be dismissed as negligible. However, taken together as dozens of inter-related shielings, townships, dykes and other archaeological remains, those effects add up to much more.

It is also evident that the effect on a few important 'assets' is significant (although this is rather lost in the morass). This should also jump out at anyone who has looked at the route of the proposed turbine access road through the glen.

Potential impacts

In the Inner Study Area (the site of the wind farm and access road), various Archaeological Remains were identified and it is recognised that: "Construction of the earthworks for the Access Route would wholly remove Allt Mathaig Shieling (3) (Asset 30; see Figure 12.1 Sheet 1) which has been assessed to be of low sensitivity. During construction the magnitude of this impact has been assessed to be substantial and the significance of effect moderate."

For many other 'assets', Appendix A12.3a repeatedly says: "While this heritage asset is located within the site boundary, no works are proposed in its vicinity of this heritage asset and therefore there would be no physical impact on it because of the construction of the Proposed Development." However, this ignores the fact that the feature will be surrounded by giant turbines and the access tracks serving them, which will have a significant effect on their cultural heritage.

A closer examination of Appendix A12.3a reveals that "Construction of the Access Route Earthworks would permanently remove" parts or the whole of numerous other heritage assets. However, the effects are rated as Minor, an assessment we disagree with.

We are particularly concerned about Invergeldie Bridge over Invergeldie Burn (Asset 54; a Category B Listed Building assessed to be of medium sensitivity; see Figure 12.1 Sheet 3). Its quality and nature would be destroyed by "realignment of the track and removal of sections of drystone walling" and fear that the bridge itself could collapse under the weight of the turbine parts transported across it. There is no evidence that an engineering survey has been done to check whether it can withstand such loads.

A serious omission from Appendix A12.3a is the Historic Building of Fintallich (asset 60). This Farmstead adds a great deal to the character of the glen and stands where the Public Right of Way diverges from the Glen Lednock Road and heads off across grassy pastures, along the line of Fintallich Dykes (asset 61) to run east of the River Lednock. This is also the proposed route of the new access road. Appendix A12.3a acknowledges that construction would permanently remove 300m of the dyke and we fear that the farmstead itself would

also be demolished to make way for turbine transport. We would like to know why it has been omitted and what its fate would be.

In the Outer Study Area, we are particularly concerned about Balmuick Stone Circle (Asset 265), which is a Scheduled Monument lying 1600m ENE of the access road. It is recognised to be of high sensitivity. The EIAR described it thus:

‘It comprises the remains of a stone circle, which is an approximately circular setting of spaced, usually freestanding, upright stones. While some of the stones forming this heritage asset have fallen, the relationship between the stones themselves is highly legible. This, and its potential to provide archaeological evidence to add to our understanding of Neolithic and Bronze Age ritual activity, contributes to the cultural significance of Asset 265. The elements of the setting of Asset 265 which also make a significant contribution to its cultural significance and how it is understood, appreciated, and experienced comprise its elevated position at the summit of a small hill, providing immediate views of the valley of the River Earn to the south, distant views to the south-east across Strathearn to the Ochil Hills, more constrained views to the north, views along Glen Lednock to the north-west, and its temporal relationship with similar sites nearby (including Wester Tullybannocher, stone circle 650m NE of; Asset 275; a Scheduled Monument which is located approximately 4km south-west of Asset 265). However the bare-earth ZTV indicates that 18 hubs and 19 blade tips would be visible in views to the north-west.’

The above assessment fails to recognise its relationship Dunruchan Hill, on the south side of upper Strathearn.. This hill has several individual standing stones on it (two of which are identified as Asset 270) and superb views over the strath to Balmuick Stone Circle and the Highland edge. Although the proposed development will be ‘full in the face’ from Dunruchan, the EIAR concludes that there is **no impact**:

While a maximum of 10 hubs and 17 turbine tips may be visible from this heritage asset, given the distance between this heritage asset and the Proposed Development (approximately 14km) the Proposed Development would not impact on the setting of this heritage asset.

Known locally as Standing Stone Hill, Balmuick Stone Circle treasured by many, and integral to a number of cultures for a variety of reasons, which weave through past, present and future. It should be noted that the significance of the hilltop standing stones spans well beyond the local place-based communities and contributes to Scotland’s travel and tourism economy having attracted visitors from Canada, Colombia, Mexico and South Africa that we know of within the past year. Please see more about its value in the appendix below.

Another cultural feature assessed is the Prehistoric ritual and funerary cairn (Asset 305) on top of Torlum Hill. This is recognised in the EIAR as high sensitivity – with panoramic views across Strathearn. However, it is dismissed thus:

During operation of the Proposed Development an effect of negligible significance was assessed due to the potential visibility of a maximum 17 hubs and 19 blade tips indicated by the bare-earth ZTV, albeit at a distance of approximately 14 km and filtered by intervening woodland.

This ignores the fact that many of the trees near the top of Torlum Hill are juvenile and only partially obscure the views (having been deliberately not planted on the summit) and that within the 40-year lifespan of the wind farm they would most probably be harvested (as has already happened for much of the lower slopes).

Conflicts with policy

We believe that the impacts of this development go against Policy 7 of National Policy Framework 4 (NPF4), which “seeks to protect and enhance historic environment assets and places, and to enable positive change as a catalyst for the regeneration of places”.

Policy 7(h) states that Development proposals affecting Scheduled Monuments will only be supported where:

(i) direct impacts on the Scheduled Monument are avoided;

(ii) significant adverse impacts on the integrity of the setting of a Scheduled Monument are avoided;

or

(iii) exceptional circumstances have been demonstrated to justify the impact on a Scheduled Monument and its setting and impacts on the monument or its setting have been minimised.

We maintain that that is not the case here.

Similarly, we believe it contravenes Perth and Kinross Council's Local Development Plan 2 (LDP2). We particularly note the first part of this policy and do not feel that 'exceptional circumstances' have been justified. Moreover the proposed mitigation only goes partway to meet the requirements of the second part of the policy:

'Policy 26: under Policy 26A there is a presumption against development which would have an adverse effect on the integrity of a Scheduled Monument and its setting, unless there are exceptional circumstances. Policy 26B identifies that Perth and Kinross Council will seek to protect areas or sites of known archaeological interest and their settings, and that there will be a strong presumption in favour of preservation in situ. Where, in exceptional circumstances, preservation of the archaeological features is not feasible, the developer will be required to make provision for the survey, excavation, recording and analysis of threatened features prior to development commencing. Discoveries made during any development should be reported to Perth and Kinross Council and work suspended until mitigation measures have been agreed.'

We are particularly concerned about the impact of the proposed development on Invergeldie Bridge (Asset 54), Fintallich (Assets 60 & 61) and Balmuick Stone Circle (Asset 265).

We urge that the cultural heritage of Glen Lednock be considered as a whole, not as a fragmented series of 'assets' to be dismissed in turn. We do not think that sufficient attention has been given to these 'assets' as an inter-related collection of features.

10. Climate Change

Peatland and Carbon: what will be lost

While the proposal is framed as climate-positive through renewable energy generation, it is important to recognise that peatlands are themselves critical climate infrastructure³. They store significantly more carbon per hectare than forests, while also supporting biodiversity and regulating water systems. When peatlands are disturbed, through excavation, drainage or compaction, they release stored carbon, contributing to net emissions in the short to medium term⁴.

In this case, the development of the Glen Lednock wind farm would lead to the permanent loss of 39.5 hectares of peatland, including 14.7 hectares of priority peatland habitat and 4.8 hectares of montane bog (Appendix A7.3 – Outline Peat Management Plan). The developer argues that 24.8 hectares of peatland within the site are in “poor condition” due to historic land management, and therefore not classified as priority habitat. However, degraded peatland can still function as a carbon store, and disturbing it still risks substantial emissions, particularly where deep peat remains intact. Rather than justifying development, its condition should strengthen the case for on-site restoration, not further damage. In addition, even though the developer claims to have avoided the most sensitive areas, turbines and associated infrastructure are still planned on Class 1 peatland, which NatureScot defines as nationally important deep peat and carbon-rich soils with high conservation value.

According to the developer’s own surveys and mapping,⁵ infrastructure would be located on areas with peat depths of 0.5–2 metres, and >2 metre deep peat exists elsewhere on-site. Notably, a local resident has also conducted independent peat probe work at the proposed turbine locations and recorded peat depths in excess of 2 metres. This includes turbine 1, 10, 11, 13, 17 and 19. While this is not part of the official Environmental Impact Assessment, it highlights the potential for underestimation of peat depth and the need for precaution, particularly where carbon-rich soils are concerned. Even where the developers claim the turbines avoid the deepest peat, associated construction activity, including access roads, drainage, and cable trenches, would likely fragment or degrade adjacent areas.

This approach directly contradicts key policies in NPF4, which require:

- protection of carbon-rich soils
- minimisation of disturbance to upland peat and wetland systems
- support for peatland restoration as a nature-based climate solution

Furthermore, approximately 102,000m³ of peat is to be used to fill borrow pits that currently contain no peat at all (Appendix A7.3). While described as “reinstatement,” the steep terrain, proximity to watercourses, and lack of technical detail suggest this is more accurately described as “disposal” rather than meaningful restoration.

Restoration proposals: uncertainty, and potentially publicly-funded

While the developer claims that peatland restoration would more than compensate for habitat loss, proposing a minimum target of 161.7 hectares of restoration (including 147

³ Glenk, K. and Martin-Ortega, J., 2018. The economics of peatland restoration. *Journal of Environmental Economics and Policy*, 7(4), pp.345-362.

⁴ Horsburgh, N., Tyler, A., Mathieson, S., Wackernagel, M. and Lin, D., 2022. Biocapacity and cost-effectiveness benefits of increased peatland restoration in Scotland. *Journal of Environmental Management*, 306, p.114486.

⁵

<https://cdn.sanity.io/files/mm8mpr8w/production/4f786ba32a7e92c0b166bfa6ccae923454158d5c.pdf>

hectares as compensation and an additional 14.7 hectares as enhancement), based on plans outlined in Appendix A9.7 and Appendix A7.3 the restoration plans appear to be:

- conditional on further survey work
- conditional on agreement with NatureScot

Restoration also appears to be dependent on a successful application to the publicly-funded Peatland ACTION scheme. This raises serious concerns that publicly-funded peatland restoration is being positioned as compensation for private environmental damage, and possibly as a future carbon credit asset. This is inconsistent with both the spirit and detail of Scotland's peatland policy, and it risks setting a damaging precedent for how natural capital investment is used to justify development. In effect, it could be perceived that this is a plan to use public funding to compensate for privately-driven environmental damage, and potentially to monetise that compensation through future carbon credit sales. This raises significant questions of:

- policy consistency with NPF4 and Scotland's Peatland Action goals
- additionality and integrity in natural capital markets
- public trust in how nature restoration is being used to justify damaging development

This means the restoration is uncertain in scope, conditional on future funding, and delayed well beyond the start of construction. If publicly-funded peatland restoration is being used to compensate for damage caused by the wind farm, this raises serious concerns about who is really bearing the cost of environmental repair.

Carbon Credits, natural capital and public trust

Oxygen Conservation, the estate owner, promotes an ambitious "Masterplan" to restore nature and generate natural capital value across the wider Invergeldie Estate, including proposals for woodland creation by planting 1.5 million native trees, and peatland restoration covering 560ha. These plans are commendable in principle, but they are separate from, and not contingent upon, the Glen Lednock Wind Farm proposal (Appendix A9.7, Section 3.2.). Despite this, the developer suggests that the Habitat Management and Biodiversity Enhancement Plan (OHMBEP) for the wind farm is intended to "integrate with" the wider Masterplan to deliver biodiversity benefits at a landscape scale. In doing so, the application blurs the boundary between restoration proposed in response to turbine impacts and restoration already planned elsewhere.

This matters. Restoration across the wider estate should not be treated as ecological compensation for damage caused by the wind farm. To do so would undermine key environmental safeguards and misrepresent the principle of additionality — the idea that claimed climate or biodiversity gains must be genuinely new, not the re-labelling of existing plans. There is a plausible risk that Oxygen Conservation may later seek to generate carbon credits from the same peatland restoration used to justify turbine construction⁶. This raises serious concerns about:

- **Additionality:** Carbon credits must represent reductions that would not otherwise occur. Restoration in one part of the estate cannot justify destruction in another – it is not a net gain, and may in fact result in a net loss.
- **Double-counting and double-benefitting:** If publicly-funded restoration (e.g. through Peatland ACTION) is later used to sell credits or offset development, this raises fundamental concerns about equity, policy integrity, and the use of public money.

⁶ <https://hive.greenfinanceinstitute.com/gfihive/revenues-for-nature/case-studies/oxygen-conservation-blackburn-hartsgarth-invergeldie/> and <https://cdn.sanity.io/files/mm8mpr8w/production/adb8e9c5027890e1ae67b6ba5e7bef49e440e478.pdf>

- **Greenwashing:** Marketing this project as climate-positive – while relying on peatland destruction and loosely linked estate-wide restoration – risks eroding public trust in Scotland’s nature-based solutions.

These concerns are not speculative – they are directly relevant to the credibility of The Scottish Government’s Principles for Responsible Investment in Natural Capital (2024)⁷. At present, the Glen Lednock proposal does not provide clear safeguards to prevent natural capital benefits from being monetised twice, and nor does it ensure that public subsidy is not used to offset private environmental harm.

Full life-cycle carbon accounting?

While limited carbon balance figures are presented, primarily relating to peat disturbance and turbine operation, it remains unclear whether these calculations include:

- emissions from the manufacture and international transport of turbine components (steel, fiberglass, rare-earth metals)
- emissions from construction-phase transport, including up to 400 HGV movements per day
- fuel use for on-site machinery and materials delivery
- end-of-life emissions related to decommissioning or disposal of infrastructure

Current good practice (e.g. PAS 2080 for infrastructure carbon⁸, and the Scottish Government’s own Net-Zero guidance⁹) recommends that major infrastructure projects present a whole-life GHG inventory, not just operational emissions. Without transparent life-cycle data, it is impossible for decision-makers or the public to judge whether the scheme delivers a genuine net-carbon benefit once all embedded emissions are counted.

To conclude, *The Onshore Wind Sector Deal (2023)* states that Scotland will only meet its energy targets by being **a world leader in responsible wind development**, ensuring wind farms "co-exist with sensitive habitats, peatland, carbon-rich soils and biodiversity."

The Glen Lednock proposal fails to demonstrate that this balance has been achieved. Scotland’s renewable energy goals are important – but they must be met in ways that **genuinely protect and enhance biodiversity, respect natural carbon stores, and uphold public confidence** in land-based climate solutions.

The Glen Lednock proposal risks setting a dangerous precedent: where **peatland can be destroyed now**, with restoration deferred, **publicly funded**, and potentially sold back to the market. This is not climate leadership — it is **offsetting with public money**, with questionable climate or biodiversity gain.

This development poses a **long-term risk to Scotland’s credibility** on natural capital, carbon markets, and ethical land use. For that reason, we believe it should not go ahead.

⁷ <https://www.gov.scot/publications/interim-principles-for-responsible-investment-in-natural-capital/>

⁸ <https://www.carbontrust.com/what-we-do/assurance-and-labelling/pas-2080-carbon-management-in-infrastructure>

⁹ <https://www.gov.scot/publications/research-inform-national-planning-framework-4-planning-climate-change-guidance-report-issue-3/pages/4/>

11. Socio-economics, Tourism and Recreation

SOCIO-ECONOMICS

Introduction

The application for Section 36 consent for the Glen Lednock wind farm raises significant concerns, particularly regarding the socio-economic impacts outlined in Chapter 15 of the EIAR. Our analysis of the contents of this section points to weaknesses and failings of the EIAR. We draw attention to inadequacies in the evaluation of the socio-economic implications for local communities in Upper Strathearn, and how these shortcomings contradict the principles set out in NPF4.

NPF4 Principles and Local Community Experience

The foreword and introduction of NPF4, articulated by the Scottish Government Minister for Public Finance, Planning and Community Wealth, emphasise the importance of community involvement in planning processes. The Minister states, “Changes to our places will not always be easy. People care about their neighbourhoods and rightly and reasonably expect that new development should improve their lives, rather than undermining what they value most.” This sentiment resonates deeply with the experiences of local communities in Upper Strathearn, from Crieff to St Fillans, who have felt excluded from a planning system that has not been “fairer and more inclusive.”

In Part 1 of the Framework, the commitment to empowering communities and ensuring a ‘just transition’ to a net-zero society is clear. However, the proposed development of the Glen Lednock wind farm contradicts these foundational principles, as it threatens to undermine the very fabric of local life and economic stability.

Inadequate Socio-Economic Impact Assessment

Reliance on National and Regional Data

The EIAR’s socio-economic analysis is primarily based on statistical predictions derived from national and regional data, which do not accurately reflect the local context. This approach leads to an overestimation of the economic benefits while neglecting the nuanced and often detrimental impacts on the local community. The predictions of large economic benefits at the regional and national levels fail to account for the potential loss of local jobs and livelihoods, particularly for those living closest to the development.

Neglect of Societal Disbenefits

The EIAR inadequately addresses the societal disbenefits associated with the wind farm, such as potential health impacts, diminished quality of life, and the erosion of community cohesion and resilience. The focus on economic gains overlooks the reality that the local population may experience significant negative consequences, which should be a primary consideration in any socio-economic assessment.

Community Benefit Funds as a Distraction

The EIAR places considerable emphasis on the community benefit funds that the developer proposes to provide. However, these payments are voluntary and not mandated by law, rendering them an unreliable and insufficient basis for justifying the development. Being voluntary and under the control of the developer, presumed community benefit payments are not a material planning consideration valid within the context of a Section 36 Consent determination. The vague and undefined nature of the “substantial community benefit package” raises questions about its actual impact and whether it can genuinely offset the harm caused to local communities and individual businesses.

Traffic and Access Road Concerns

Significant Traffic Impacts

The proposed access road and associated traffic impacts represent a substantial threat to the communities of Comrie and Crieff. The EIAR fails to adequately assess the potential disruption and degradation of local infrastructure, which could lead to increased congestion, safety hazards, and a decline in the quality of life for residents. Such societal damage is unacceptable and could have been avoided through responsible planning and adherence to best practices endorsed by industry bodies like Scottish Renewables.

Lack of Coordination between Developments

The EIAR does not sufficiently address the need for coordination between the Glen Lednock and Glentarken wind farm developments. The Onshore Wind Sector Deal emphasises the importance of collaboration between developers to minimise impacts on local communities. The lack of cooperation has resulted in a poorly conceived access road proposal that exacerbates the potential for disruption and causes more environmental harm than the potentially available, but apparently unexplored shared alternative.

Alternative Access Solutions Ignored

It must be highlighted that a less damaging access route is available, which is well-separated from human settlements. The failure to consider this alternative demonstrates a lack of due diligence on the part of the developers and raises concerns about their commitment to minimising harm to local communities.

Conclusion

The EIAR Chapter 15 section on socio-economic impacts presents a flawed assessment of the Glen Lednock wind farm's implications for local communities. The reliance on broad statistical data, neglect of societal disbenefits, and the emphasis on voluntary community benefit funds undermine the credibility of the socio-economic analysis. Furthermore, the significant traffic impacts and lack of coordination between developments exacerbate the potential harm to local residents and the environment.

The principles outlined in NPF4, which prioritise community involvement, sustainable development, and the protection of local interests, must be upheld. The proposed development contradicts these principles and poses a threat to the socio-economic fabric of Upper Strathearn. Therefore, it is imperative that ECU carefully considers these objections and denies consent for the Glen Lednock wind farm, ensuring that the voices of local communities are heard and respected.

TOURISM

Introduction

We have significant concerns relating to how the EIAR Chapter 15, addresses socio-economic impacts, with a specific focus on tourism. The serious shortcomings and misrepresentations presented in the assessment of tourism impacts and the potential negative consequences for the local economy and community prosperity are highlighted as follows:

Inadequate Assessment of Tourism Impacts

Lack of Comprehensive Data: The EIAR fails to provide a robust analysis of existing tourism trends in the area. It relies on outdated statistics and does not adequately consider the growing importance of eco-tourism and outdoor recreational activities in Scotland. A more thorough examination of current visitor numbers, demographics, and spending patterns is essential to understand the potential impacts of the wind farm on local tourism.

Neglect of Local Tourism Businesses: The report does not sufficiently address how the wind farm may affect local tourism businesses, such as bed and breakfasts, hotels, multi-activity venues and outdoor activity providers. The potential for decreased visitor numbers due to the visual impact of the wind farm, noise pollution, and changes in the landscape associated with the proposed access route and its construction have not been adequately evaluated. This failing could lead to significant economic repercussions for these businesses, which are vital to the local economy. Evidence to support this claim is offered by a representation

Insufficient Stakeholder Engagement: The EIAR indicates limited engagement with local stakeholders, including tourism operators and community members. Effective consultation is crucial to gauge the sentiments of those directly affected by the proposed development. The lack of a comprehensive stakeholder engagement process undermines the credibility of the findings presented in the EIAR.

Evidence to illustrate, and in support of the three statements above is offered by way of a letter from one of only two medium sized (50 - 249 employees) tourism enterprises located within Comrie parish. Expressing concerns about the damaging effects of the wind farm development on this B Corp accredited business and the wider local economy, the letter, addressed to Comrie & District Community Council, is quoted in full in the Appendix at the end of this chapter:

Potential Negative Impacts on Tourism

Visual Impact and Landscape Alteration: The proposed wind farm is likely to have a significant visual impact on the landscape, which is a key attraction for tourists visiting Strathearn. The EIAR does not adequately quantify how this alteration will affect the unique aesthetic value of the area. Many visitors come to Strathearn seeking the natural beauty and tranquility of the Southern Highlands, as relief and respite from urban stresses of the cities and larger towns in the post-industrial Central Belt

Noise Pollution: The potential for noise pollution from the wind farm has not been thoroughly assessed in relation to its impact on the tourism experience. Many tourists are drawn to the area for its tranquility and natural sounds. The introduction of wind turbines may disrupt this environment, leading to a decline in visitor satisfaction and, consequently, a reduction in tourism.

Impact on Outdoor Activities: The EIAR does not sufficiently consider how the wind farm may affect outdoor recreational activities, such as hillwalking, climbing, bouldering, cycling, and wildlife watching. These activities are integral to the tourism appeal of the Glen Lednock area. The location of wind turbines and access corridors will limit visitor access to important recreation features in the mountain landscape and will alter the cultural heritage and natural habitat experience for many outdoor recreational users, thereby diminishing the overall experience for visitors.

Conclusion

In conclusion, the EIAR Chapter 15 on Socio-Economics, Tourism and Recreation presents a flawed assessment of the potential impacts of the Glen Lednock wind farm on tourism. The lack of comprehensive data, insufficient stakeholder engagement, and inadequate consideration of the negative impacts on local tourism businesses and the visitor experience raise significant concerns. We contend that it is imperative that the ECU should carefully scrutinise these elements of the EIAR in their consideration of whether to grant consent for

the proposed wind farm. The potential adverse effects on tourism and the local economy of Strathearn have not been recognised in the EIAR.

In view of the central contribution that tourism provides in support of the current economy and prosperity of Strathearn, Crieff, Comrie and the Glen Lednock area this is a glaring failure that discredits all claims in the EIAR that the proposed wind farm will contribute to sustainable development of benefit to both the environment and the communities in Strathearn who depend on the qualities of our local environment. For these reasons we believe that ECU must reject the Section 36 consent application for Glen Lednock.

RECREATION

Introduction

Recreation is an important aspect of life for residents of, and visitors to, Comrie, perhaps more so than in other places. Many people have relocated to this area specifically because of the outstanding opportunities to access natural outdoor spaces it offers. That includes the authors of this objection, who over the years have developed an intimate knowledge and love of the surrounding countryside, which makes us horrified at the shallow nature of the desk-based assessment of impacts. The same outdoor opportunity characteristics attract visitors, so we are trying to represent their interests too.

An important aspect of the recreation experience is not just physical access and activity, but also the mental benefits of being in a beautiful environment with limitless views of successive ranges of mountains to the north and west, unspoilt by obvious man-made features.

NatureScot Research Report 1361 - SPANS Scotland's People and Nature Survey 2023/24 – identifies that: "People living closest to high quality greenspaces are most likely to use them frequently." It also emphasises that: "Local greenspaces are a vital resource for people's physical and mental health."

Glen Lednock is heavily used for walking, running, mountain biking, road cycling, horse riding, climbing and bouldering, wildlife watching, outdoor photography, picnicking and connecting with nature.

Several local recreational clubs make good use of Glen Lednock and the surrounding hills, including the Strathearn Ramblers, Stride for Life (a health walking group), Strathearn Harriers, Strathearn Mountain Biking Club, as well as informal groups, such as Rise & Grind, whose members walk, run and cycle to Balmuick stone circle at dawn every Thursday.

Glen Lednock also attracts outdoor enthusiasts from further afield, with numerous visitors coming every day to walk the Glen Lednock Circular walk (which is widely publicised), climb Ben Chonzie (according to WalkHighlands the seventh most-climbed of 282 Munros in Scotland) and Creag Uchdag (89th most climbed of 222 Corbetts in Scotland). Many others make their own routes through this scenic landscape. In addition, one of Scotland's Great Trails, the Rob Roy Way, passes just to the north of the proposed wind farm site.

EIAR summary and scope

We strongly contest the assessment regarding Trails and Paths in the Executive Summary (and repeated in Table 14:17): "Very little or no effect on the behaviour of visitors/tourists that use trails and paths as the Proposed Development is not expected to alter their features or characteristics."

They conclude that Assessed effect is 'Negligible' and the Statement of Significance is 'Not significant'.

We challenge that because we believe that access-takers will be deterred by the radical change to the natural character of the landscape, the perceived loss of wildness and the visual intrusion of wind turbines. Two examples: the wind farm will stand bang in front of the view from Ben Chonzie to Ben More and Stob Binnien; the tranquil 'infinity loch' Lochan Mhaoil na Meidhe will be overshadowed by a turbine 200m from its shore, blocking the view of Ben Lawers, with the Main Works Primary Construction Compound and Proposed Control Building and Substation Platform 100m to the east and south. It will no longer be a place for restful picnics!

In addition, during the two plus years of construction work, access to the glen and surrounding areas will be very limited and difficult as a result of the road closure and engineering works on top of and across Public Rights of Way (PROW).

The spatial scope of the EIAR assessment of impact on recreation is narrow, as it excludes the Stirling Council area, and thus adjacent parts of Loch Lomond and The Trossachs National Park where recreation such as climbing Ben Vorlich or Meall an t-Seallaidh for glorious views over Loch Earn, will be severely impacted.

The EIAR states, "For recreational effects, such as climbing areas, recreational routes and Core Paths, an assessment of assets within 5km has been completed." However, the experience of numerous other routes in a wider area would be affected. For instance these routes would all suffer from landscape and visual impacts:

- Cowden Road to Auchingarrich path (PROW 25/6 & CMRI/6), which has a glorious view from Bogton Braes over the village to the Highlands and high ground around Glen Lednock
- Auchingarrich via Barr Dubh to Strowan-Balloch Road (CMRI/104), which has similar views as it skirts the flanks of Torlum Hill
- numerous more distant hill climbs, such as Ben Lawers and Meall nan Tarmachan

Tourism and recreational baseline conditions

In 14.4.16 the EIAR states: "There are four Core Paths within the Site as shown on Figure 14.1". It fails to identify these Core Paths and Public Rights of Way that are within the site:

- Shaky Bridge to Funtullich: PROW: 25/37 – this glorious grassy path/track far from the public road would be obliterated by the planned access road up the east side of Glen Lednock
- the Milton to Glen Lednock via Balmuick and Shaky Bridge: CMRI/36 and ROW: 25/36 – this lies within 200m of the planned access road
- path from CMRI/9 in Laggan Wood to CMRI/36 at Shaky Bridge: CMRI/8 and ROW: 25/8 – this lies within 400m of the planned access road and is the east part of the Glen Lednock Circular

Nor does the EIAR identify paths adjoining or using Monument Road that would be affected by the construction vehicles and contractors developing the wind farm. These are:

- path from Monument Road via Deil's Cauldron to Monument Road below Melville's Monument: CCMRI/7 and PROW: 25/7 – this is part of the much loved and heavily used Glen Lednock Circular, which uses Monument Road for 1km with no pavement for over half that distance
- Lord Melville's Monument. Path from Monument Road opposite CMRI/7 to CMRI/18 via Monument: CMRI/53 and PROW: 25/7 – an iconic location and superb viewpoint
- Glen Lednock road at Pollyrigg Wood to Maam Road at Cluan Wood: CMRI/19 and PROW 25/19 – this is part of a circular walk that follows Monument Road down into the village

In 14.4.17 the EIAR states: "As shown on Figure 14.1, there are other Core Paths around Comrie and St. Fillans, within 5km of the proposed WTG locations." These include:

- Maam Road. A85 at Kindrochet, passing north of Dunira, to Glen Lednock road north west of Monument: CMRI/18 and PROW 25/18 – and important east-west connection from Monument Road

It seems disingenuous to exclude Monument Road from the site plan, as this road would effectively be taken over by the wind farm development, having a major effect on recreation.

The desk study of the paths affected appears poor quality and missing important locations. It does not inspire confidence when the Perth and Kinross Council website has publicly-available interactive maps of Public Rights of Way at <https://www.pkc.gov.uk/article/18560/Map-of-rights-of-way> and Core Paths at <https://www.pkc.gov.uk/article/15439/Core-Paths-Plan-interactive-map>.

Potential impacts

Section In 14.5 of the EIAR is woefully inadequate as it hives off consideration of potential impacts to Chapter 11 (Access, Traffic and Transport), where most of the consideration is road-based. As with so many parts of the EIAR, that chapter “considers potential impacts on these assets through professional judgment”, which is made by individuals with no direct experience of the area.

Unfortunately Chapter 11 only addresses pedestrians and cyclists using the road network. We can find no evidence that the recreation impacts in Glen Lednock itself have been considered. What about impact on hill walkers, rock climbers, horse riders and mountain bikers? Nor is there consideration of the impact that restricting or shutting off access to the glen for two years will have on the Strathearn economy.

Cumulative tourism and recreation effects

Paragraphs 14.5.40 reaches a conclusion that “the effect of construction and operation activity associated with the Proposed Development on the Perth and Kinross economy was assessed as negligible, which is not significant in terms of this EIA.” This totally ignores the importance of recreation in bringing visitors to the area.

If visitors are denied access to Glen Lednock for eight months then experience heavy traffic, noise, dust and unsightly scars being bulldozed across the landscape for a further 16 months at least, it is likely to crash the number coming to Comrie.

Moreover, there appears to be no recognition of the recreational impacts over the wider than 5km area, particularly among hill walkers and mountain bikers who would see the greatest visual impact from the intrusion of the turbines onto the landscape.

Effects on tourism and recreational assets

As explained above, we strongly disagree with the statement in 14.5.56: “It is anticipated that there will be no significant negative impact on the tourism industry or recreational assets as a result of the Proposed Development.”

Mitigation

Paragraph 14.6.2 states: “A Construction Traffic Management Plan (CTMP) will be implemented for the Proposed Development to manage the effect of construction traffic on the public road network”. It promises that this will include, “the erection of site signage along the traffic route to warn people of construction activities and associated construction vehicles.”

This is completely inadequate, as it does not address the problems that will occur for access takers. It is astounding that no thought has yet been given to that Construction Traffic Management Plan and how it would/could work. This is fundamental to mitigation and probably an extremely thorny problem to tackle – maybe that is why it has been left out?

NPF4 Policy 18 states that, “Development proposals will only be supported where it can be demonstrated that provision is made to address the impacts on infrastructure.”

Monument Road is a single-track road with blind bends and little enough space for cars to pass pedestrian and cyclists, let alone HGVs. Along the wooded part of its length, it drops off precipitously to the River Lednock and Deil’s Cauldron, so there is no extra space available.

It has small passing places, which would have to be enlarged to cope with frequent two-way HGV traffic.

We believe the recreational issues of using Monument Road to develop a wind farm at the head of the glen have been vastly underestimated, as have the wider recreational impacts.

Conclusion

The National Health Service is suffering under the burden of increasing physical illness in the population, particularly obesity and diabetes, and of mental illness, especially depression and anxiety. Exercise is well known to aid physical wellbeing, but access to high-quality greenspaces is also invaluable for mental health. The National of 17 July 2025 reported that pilot outdoor therapy schemes in Norway have seen a 30% reduction in depression cases.

There is a risk of recreational activity, vital for the physical and mental health of Strathearn residents and visitors, being compromised by the curtailing of access due to wind farm construction over at least two years and by the change to the nature of the landscape by the addition of 19 giant turbines (or possibly 31 with Glentarken) to the high ground on the west side of the glen. These are likely to deter future access, particularly to landscapes in close proximity to the wind turbines.

The proposed development goes against Perth and Kinross Local Development Plan 2, which details the policies and proposals by Perth and Kinross Council designed to guide regional development through to 2029. In particular the policies to:

- protect the natural and built environment, ensuring that new developments consider sustainable design and construction
- protect and enhance the character of the areas landscape
- conserve habitats and species of importance

It also goes against Spatial Principles on Local Living in NPF4: “We will support local liveability and improve community health and wellbeing by ensuring people can easily access services, greenspace, learning, work and leisure locally.” NPF4 states that “By applying these spatial principles, our national spatial strategy will support the planning and delivery of:

- sustainable places, where we reduce emissions, restore and better connect biodiversity;
- liveable places, where we can all live better, healthier lives; and
- productive places, where we have a greener, fairer and more inclusive wellbeing economy.

APPENDIX TO SOCIO-ECONOMIC, TOURISM AND RECREATION

Dear Comrie Community Council

Glen Lednock Wind farm

I would like to express my significant concern for the future of Comrie Croft, the local economy and local community resilience should the Glen Lednock Wind Farm be built.

Comrie Croft has been patiently created over more than two decades, with a mission for community and natural regeneration. Over 100 local people are now employed or have their own business here. These jobs are all dependent on our beautiful landscape. We support and are pursuing the rapid and urgent transition to a net zero economy, having invested heavily in decarbonising our business and achieved 'net zero' for emissions under our control since 2020. Having studied the proposals for the Glen Lednock Wind Farm carefully I believe the case for it does not stack up in this location and will do serious harm to both our business and to the local economy.

In a wider context, the foundation of Comrie's visitor economy is the landscape. Driving over the Langside, the first view of Comrie is an incredible vista of the village with its mountainous backdrop. People come to walk and bike in those same hills and to experience a closeness to nature that is no longer possible in much of our industrialised central belt. This visitor economy doesn't just support 'tourism' businesses - it is also a mainstay of local tradesmen, the pub, restaurants, cafes and shops that give our village economy its vitality.

I hope this information is useful as the Community Council decides how to respond to the wind farm proposals.

Yours faithfully

Andrew Donaldson

12. Television, Radio and Telecommunications

Regarding terrestrial television and radio, we do not agree with the Executive Summary statement that “The Proposed Development is predicted to have a **negligible magnitude of impact** upon surrounding terrestrial television and radio services.” This statement relies on the judgement that “Dwellings receiving terrestrial television and radio services are deemed to be **medium sensitivity**. As such, the effect would be of **negligible significance** and **no likely significant residual effects** are predicted.”

However, for people living in remote areas that are potentially affected, such as Glen Lednock and Glen Artney, television often provides company and information that they may lack because of their isolation compared to the people living in the main settlements. To dismiss their needs like this appears insensitive.

“Mitigation options for isolated incidents” are presented in Appendix A15.1, produced by PagerSolutions. Described in 7.2.1 of that document, the burden of engineering and paying for all these mitigations appears to fall on the owners of the dwellings. This is not acceptable, especially considering that many of them are elderly or low waged.

This Appendix optimistically concludes that “Noticeable impacts upon radio signals in the surrounding area are not predicted. This is because the assessment area is outside predicted radio coverage. Additionally, alternate transmitters can provide coverage as radio transmission are more robust and receivers are designed to accept transmissions in dynamic environments.” However the onus for any mitigation of radio interference, as described in 7.2.2, again falls on those affected.

Increasingly, households are relying on mobile telephones rather than landlines and these are essential for those working out and about in this rural region. They are often a matter of personal safety. Mobile telephone signal is poor or non-existent in many parts of our area, so we believe that any loss of or interference with signal would have **significant** impacts.

We note that Vodafone, Virgin O2 and Mobile Broadband Network Limited (MBNL) have been contacted by the applicant but no responses have yet been received. We recommend that this application is rejected because it fails to demonstrate that there will be no adverse effects on mobile phone coverage.

Similarly we urge that this application is rejected because the developer is not accepting responsibility for any mitigation required to maintain television and radio reception at affected dwellings.

13. Aviation

Low Carbon's application assesses the potential impacts of the proposed development on aviation and radar infrastructure during the construction, operation, and decommissioning phases. The assessment considers the effects on civil and military aircraft, radar systems, and aviation safety, and outlines the mitigation measures proposed to reduce adverse impacts.

Their assessment identified **moderate adverse** effects on the Lowther Hill Primary Surveillance Radar (PSR) due to radar clutter, which is **significant** in Environmental Impact Assessment (EIA) terms. They appear to think that this can be mitigated by various strategies – radar blanking or the Indra solution (Mitigation Item AV1) – reducing the residual impact to **minor adverse**, which they consider **not significant**.

However, we believe that any adverse impact on aviation safety is **significant**. This belief is reinforced by NATS (National Air Traffic Safety) Consultation response to this application, dated 20 June 2025. Their En-route RADAR Technical Assessment predicts that 15 of the planned 19 turbines will impact Lowther RADAR, "Using the theory as described in Appendix A and turbine specific propagation profiles it has been determined that the terrain screening available will not adequately attenuate the signal for 14 of the turbines and therefore this development is likely to cause false primary plots to be generated. A reduction in the RADAR's probability of detection, for real aircraft, is also anticipated."

Additionally, where an assessment by NATS reveals a technical impact on a specific NATS ' RADAR, the users of that RADAR are consulted to ascertain whether the anticipated impact is acceptable to their operations or not. In reply, Prestwick Centre ATC judged the impact as **unacceptable** for their operations.

The EIAR states that as of 25 March 2025 the two mitigation strategies above have been agreed with NATS. But NATS consultation response of 20 June 2025 postdates that and still concludes that, "The proposed development has been examined by technical and operational safeguarding teams. A technical impact is anticipated, this has been deemed to be **unacceptable**."

We would also draw attention to the potential impact of both the turbines and the cranes used to erect them on low flying military and civil aircraft, which typically fly under Visual Flight Rules. In order to aid visibility, the EIAR states that, "Aviation lighting will be implemented as part of the embedded mitigation measures". For local people this is another **negative impact** of the proposed wind farm. We value a dark sky to the north, where we are lucky enough to view the aurora (northern lights) several times a year. The presence of an array of lighting on top of the dark silhouette of the hills would interfere with this special experience and make Strathearn feel like an industrial landscape.

We have the opinion that the EIAR does not give adequate attention to the use of the area by civil aircraft. It does not mention Strathallan airfield and the Scottish Parachute Club only 15 miles to the southeast. As well as being well used by other recreational aircraft, the parachute aircraft flying from here rely on liaison with Air Traffic Control to avoid collision with airliners when they climb to altitude and into controlled airspace. ATC needs to pick up the signal from the parachute aircraft transponder to know its position in relation to scheduled flights. Neither is there any consideration of the frequent use of helicopters by guests to the many estates and big houses in the local area; we see many of these fly relatively low over Glen Lednock.

In conclusion, we disagree with the EIAR statement that, "The sensitivity of civil aircraft is **medium** and the magnitude of the impact is assessed as **low**. Therefore, the effect will be

minor adverse, which is **not significant** in EIA terms.” Instead we believe that the effect is **significant** and agree with NATS that any threat to civil aircraft is **unacceptable**.

14. Our Key Conclusions

1. The consultation process has severely disadvantaged members of the public, not least by allowing just six weeks to digest and respond to 293 documents (some 3,000 pages) which the developer has taken years to produce.
2. We have identified multiple flaws and failures in the developer's application.
3. There are many failures by the developer to demonstrate compliance with key national and regional policies, in particular **NP4 policies** as follows
 - Policy 1 – Tackling the climate and nature crises
 - Policy 2 – Climate mitigation and adaptation
 - Policy 3 – Biodiversity
 - Policy 4 – Natural places
 - Policy 5 – Soils
 - Policy 7 – Historic assets and places
 - Policy 11 – Energy
 - Policy 12 – Zero waste
4. The proposed development fails to comply with **Perth and Kinross Council's Local Development Plan 2 (LDP2)**, whose policies are:
 - 3.1 A Successful, Sustainable Place
 - 3.2 A Low-Carbon Place
 - 3.3 A Natural, Resilient Place
 - 3.4 A Connected Place

LDP2 describes Comrie as, 'an important tourist destination' and states: 'The central area of Comrie is designated as a Conservation Area, which reflects its historic character. The village lies within a very high-quality landscape framework which provides only limited opportunities for expansion. Significant areas of the village have been affected by flooding from nearby watercourses and work has commenced on options for flood defences.'

On many counts the wind farm proposal ignores these parameters.
5. We find it odd that two adjacent wind farms are not sharing a common access. Potentially, we consider the ill-thought-out transport routing and catastrophic new access road for the turbines to have been designed to distract attention from the damage from the wind farm itself. However, even if a shared access were to be agreed with Glentarken, the proposed development would be highly damaging on many counts, including: landscape and visual, geology and hydrology, ornithology and ecology, the public road network, cultural heritage, climate change, and socio-economics /tourism / recreation.
6. The developer's evident approach to setting out the balance of benefits and disbenefits is to 'disaggregate the disbenefits and gross up the benefits' and to use language which distorts or downplays the disbenefits. For example, many disbenefits are described as 'localised' (when in practice they have a much wider impact) while claimed benefits (eg economic) are expressed at a wider regional or national scale.
7. For all the above reasons we strongly object to the Glen Lednock Wind Farm proposal.