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

Objection Summary
On behalf of the Save Glen Lednock

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Summary

of the Objection into the proposed Glen Lednock Wind Farm (s36 Application [1])
prepared for **Save Glen Lednock** by Dr. Chris Ford MRTPI.

Wind Farm Proposal, Site and Location

The Glen Lednock Wind Farm proposal (GLWF) is for a wind farm with 19 turbines up to 200m high. The Site is 9 square kilometres of high open moorland [2], with a further 2 square kilometres required for an unusually long construction access of 13km. The proposed wind farm access road would pass through two Sites of Special Scientific Interest (SSSI).

The GLWF would be located in the Grampian Mountains in Perthshire close to the edge of the Highland Boundary Fault. The site is surrounded by mountains, with Munros nearby. Most of the Site lies within 'Summits and Plateaux - Tayside' (Type 376) Landscape Classification. This is the Landscape Classification which covers most of the iconic mountains, National Parks and highest value scenic areas of Scotland. Whilst the Site itself is not covered by a national designation there are several protected scenic areas in the close vicinity of the Proposal. With blades reaching up to 830m (2725 feet) AOD, the turbines would intrude into visibility across the surrounding mountains as well as being seen from the lower Strathearn plain.

Planning and Energy Policy

Local Planning Policy

Whilst offering general support to renewable energy developments, the Perth and Kinross Local Development Plan (LDP) policies sets out clear assessment criteria against which the merits of any proposal needs to be judged. Notably these include natural heritage, landscape, visual effects, residential amenity, contribution to targets, net economic impact including on the local economy, transport impacts, construction access tracks, soils and particularly peats. Importantly, given the socio-economic character of Perthshire, particular attention is given to recreation, public access and tourism as well as impacts on national parks.

[1] S36 Application under the Electricity Act 1989 as amended and the Town and Country Planning (Scotland) Act 1997 (Energy Consent Unit reference: ECU00004966).
[2] Between 500 and 620m above sea level.

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

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

SCOTTISH PLANNING POLICY

Scottish Ministers' policy, relevant to the proposed wind farm, is set out in the National Planning Framework Four (NPF4) and the Onshore Wind Policy Statement (OWPS).

NPF4 Policy 11, on energy, specifies that "*development proposal for all forms of renewable low-carbon and zero emissions technology would be supported*", subject to various specific criteria.

Policy 11 (e) sets out the criteria wind farms are to be judged against. On landscape these include: "*where impacts are localised and/ or appropriate design mitigation has been applied, they would generally be considered to be acceptable*". The key word here is that only 'localised' landscape impacts are acceptable.

NPF4 stresses the paramount gravity not just of climate change but also of the nature crisis. Addressing both climate change and the nature crises are seen as joint challenges of equal importance.

The Onshore Wind Policy Statement (OWPS) set an 'overall ambition of 20GW of installed onshore wind capacity in Scotland by 2030'.

The latest information shows that Scotland currently has 9.4GW of operating onshore wind farms, with a further 1.7GW under construction, and 8.9GW consented and awaiting construction. This totals 20.0GW. So, the Scottish Ministers' ambition is being achieved.

There is no need for further wind farm consents to meet the ambition. It is now for the industry to build the consented wind farms. With repowering of older wind farms, it's likely that Scotland will exceed this ambition.

UK Government Energy System Reform

Since the wind farm application is made under UK legislation and energy policy is a 'reserved matter' [3], UK energy policy, energy market regulation and the UK energy picture have to be taken into account.

The UK Government, energy regulator and system operator all recognise that, because of the way the energy system has operated in the past, there is a substantial geographic imbalance in the energy system. Developers have built and are seeking to build wind farms in locations far away from the main locations where energy is used. Whilst the main areas of energy demand are in the south and midlands of England, developers seek to build wind farms in Scotland. Scotland already has far more wind farm capacity than both Scotland's own electricity consumption and the electricity transmission network's export capacity out of Scotland. As a consequence, some 40% of Scotland's existing wind farms have to be curtailed, that means turned off, when the wind blows. The electricity cannot be used.

To address the geographic imbalance the Government, regulator and system operator are applying major changes to the way in which the energy system operates and grows. There are three aspects to this. Firstly, whilst the Government will not be introducing zonal pricing, it will be changing the transmission and connection charging systems for electricity generators, so that there are clear financial incentives for developers to locate close to energy demand. That will save money for consumers as it will avoid the need for lots of power lines between Scotland and southern England. Secondly, the Government is moving away from the past laissez faire arrangements towards a planned energy system. The Government has identified what the required capacity is for each renewable technology for each country and region. Thirdly, grid connection arrangements for generators are being reformed, so that the system operator has more control over where grid connections are available.

The Government's 2030 target for regional generating capacity for onshore wind energy in Scotland is similar to the Scottish Ministers' target. It is only very slightly higher for 2035. As explained, Scotland already has sufficient consented onshore wind energy capacity to meet this requirement. As a consequence, the UK Government, the energy regulator and the system operator do not require any further wind farm capacity to be consented in Scotland. What is needed is for new onshore wind farms and other new renewable energy to be

[3] Scotland Act 1998.

located in southern England. Accordingly, there is no need for the Glen Lednock Wind Farm to be awarded consent.

Weighing the Planning Balance for GLWF

When making decisions on any wind farm application the decision maker has to weigh the planning balance of the effects arising from the development. These positive and negative effects have to be gauged against the judgement criteria set out in planning policy.

LANDSCAPE AND VISUAL EFFECTS

Given the location of the proposed 200m high turbines, high in the mountains, one of the major effects of GLWF would be the impact on the landscape and visually. Whilst the Site itself is not protected, for landscape purposes, it is very close to a National Park, National Scenic Areas and several designated Local Landscape Areas. Every compass point around the GLWF site is covered with protected landscapes. That is a unique attribute of this proposal and the adjoining Glentarken Wind Farm proposal.

Due to the prominence of the proposed wind turbines, which are of such a size that they would be visible all across the surrounding area, GLWF would have a significant impact on all these protected landscapes. Situated on the edge of the Highland Boundary Fault, the proposal would also be visible across the lower inhabited areas of Perthshire. Recreational and tourist visitors to the area, particularly those that walk up the famous mountains in the area, would not be able to avoid sight of the turbines.

The key phrase to be considered when assessing a wind farm proposal against NPF4 Policy 11(e)(ii) is where the landscape and visual effects of the development would be 'localised'. Given the extent of visibility of the proposed wind farm it is clear that the impact of GLWF cannot be considered as merely 'localised'. GLWF would affect the nearby National Park, the close by National Scenic Areas and the Local Landscapes in the vicinity. The Perth and Kinross Planning documents identify this area as being an 'iconic landscape'. As such the GLWF does not comply with NPF4 and the local Planning Policies. The proposal is not compliant with NPF4 Policy 11(e)(ii). The proposal is contrary to LDP Policy 39 on landscape. This landscape is enjoyed by visitors. This iconic landscape is the prime reason for visiting the area. The visual effects of the GLWF are clearly significant. This confirms that the visual effects are not localised.

The development requires a 13km long construction access route; to connect the wind farm to the A85 east of Comrie. The developer claims this access would not have significant effects on the landscape and visually. They base their view on the observation that the access route would mostly use existing hill and country tracks. This implies no significant

change to the landscape and visually. However, they fail to recognise that the existing tracks are not at all suitable for carrying large wind turbine components, such as 80m long blades. To be used for these extremely large loads the tracks would need completely re-engineering. The impact on the landscape and visually in this setting would be substantial. The applicant has not assessed this properly. The character of the Glen Lednock valley, which is currently an unspoilt natural glen would be transformed by the access track and the wind turbines permanently dominating the area.

At present Glen Lednock and the surrounding mountains are unspoilt wild areas which are covered by darkness at night. GLWF would require lighting at night and therefore this dark sky would be lost.

Other Environmental Effects

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

Economic Benefits

NPF4 says wind farms will only be supported where they maximise the net economic value. The developer claims that during operation the wind farm 38 full time equivalent jobs would be created in the local area. However, this figure is really a fantasy. Experience from existing wind farms in Scotland shows there is often less than 1 local job from large wind farms, with maintenance conducted by specialists brought in from across the country and Europe.

The Applicant also has not taken any account of job losses that would arise locally because of adverse impacts on local businesses, tourism and recreational visitors.

Contribution to Targets

NPF4 and local Planning Policies say that when assessing the expected effects of wind farm developments consideration has to be given to the contribution the proposal would make to renewable energy and emission reductions targets. Since there is already an excess of wind energy capacity in Scotland, beyond what can be used, this GLWF proposal would not contribute to emission reduction. In fact, the construction would increase, rather than reduce, carbon emissions.

The proposal is also not required for to meet the targets for onshore wind energy in Scotland. Both the Scottish Ministers' and the UK Government's targets for wind energy capacity in Scotland are being met by the existing approved and under construction wind farms. There is therefore no need for further consents to be awarded to meet this need.

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CONSIDERATION OF ENVIRONMENTAL EFFECTS

When assessing any wind farm proposal, the decision maker is required to consider whether the Applicant has adequately identified and considered all of the identified environmental effects arising from the development. It clear that the Applicant has not fully assessed the impact of the access route. Early indications from the developer are that the public road up Glen Lednock and several existing tracks would need to be closed for many months. The closure and restrictions would adversely affect existing residents and visitors, including recreational visitors, to the area.

The developer says that the wind farm would be linked to the electricity grid at Killin, but they have not assessed the environmental effects arising from such a power line. Any power line to Killin would need to pass through the National Park and would significantly change the valued scenic landscape along the route. All in all, the developer has failed to fully assess the environmental effects arising from the GLWF proposal.

Conclusion

Overall, the proposed Glen Lednock Wind Farm development would have adverse environmental, social and economic impacts on the area surrounding the Site and Perthshire communities. This proposal is located in an iconic landscape which is currently unspoilt and naturally beautiful. The wind farm would fundamentally change the character of the area. If approved and built, the area would become an industrialised landscape with large structures which are alien to the area. These would become the dominant incongruous feature in the scenery.

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