



Planning and Access Committee

Meeting: 26 February 2024

Agenda item: 5

SUBMITTED BY: Director of Place

APPLICATION NUMBER:	ECU00003468 (Scottish Government Energy Consents Unit reference)
APPLICANT:	Vale of Leven Windfarm Limited
LOCATION:	Vale of Leven Windfarm, Kilpatrick Hills, West Dunbartonshire
PROPOSAL:	A proposed wind farm development comprising up to ten wind turbines of approximately 7 megawatts (MW) each, with a maximum blade tip height of up to 250m and Battery Energy Storage System (BESS) with a capacity up to 20 MW.
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1. Summary and reason for presentation

- 1.1. This report relates to a consultation by the Scottish Government Energy Consents Unit on an application for the construction of a wind farm, close to the boundary of the National Park.
- 1.2. Applications for the construction of electricity generating stations with a capacity above 50 megawatts (MW) are made to the Scottish Ministers and administered by the Scottish Government Energy Consents Unit (rather than the Planning Authority).
- 1.3. The National Park's consultation response is being reported for Committee's consideration, due to the anticipated significant adverse effects on the Special Landscape Qualities and the overall integrity of the National Park and therefore the recommendation to object to the proposed development.
- 1.4. The proposed development is a National Development, as identified in National Planning Framework 4 (NPF4). National Developments are significant developments of national importance that will help to deliver the Spatial Strategy. The proposed development is one of 18 National Developments identified in NPF4 described as "Strategic Renewable Electricity Generation and Transmission Infrastructure".
- 1.5. The proposed development is for the erection of up to 10 wind turbines of approximately 7 megawatts (MW) each, with a maximum blade tip height of 250m and a Battery Energy Storage System (BESS) with a capacity of up to 20 MW.
- 1.6. The development is situated approximately 1.7km from the National Park boundary, to the east of Balloch, in the Kilpatrick Hills, West Dunbartonshire.

2. Recommendation

2.1. That Members:

APPROVE the contents of the report and its submission to the Scottish Government Energy Consents Unit, as the National Park Authority's consultation response on the application. The response concludes that the National Park Authority **objects** to the proposal for the following reasons:

- Given the extremely large turbine size, the proposed development would often appear dominant or very prominent in the backdrop to the southern part of Loch Lomond and its associated rural setting. With a very intrusive and industrial appearance, the turbines would considerably detract from, contrast with and often compromise a very large number of Special Landscape Qualities and key characteristics that are integral to defining this iconic part of the National Park.
- The views and visual amenity of a very large number of visitors and residents of several settlements would be subject to widespread significant visual effects.
- Parts of at least (approximately) 75km of nationally important recreational routes would be subject to significant visual impacts.
- The proposed development would compromise the objectives of the National Park designation and its overall integrity.
- The proposed development would conflict with National and local landscape-related policy.

3. Site Description

- 3.1. The site is located in West Dunbartonshire, situated approximately 1.7 km south from the edge of the National Park boundary, approximately 2km from Bonhill.
- 3.2. The wind farm would be located in the north-western part of the Kilpatrick Hills across an area of open moorland. Auchencarroch Landfill Site is located to the west of the site.

Figure 1- Location of proposed Vale of Leven Wind Farm (Scale 1:350,000)

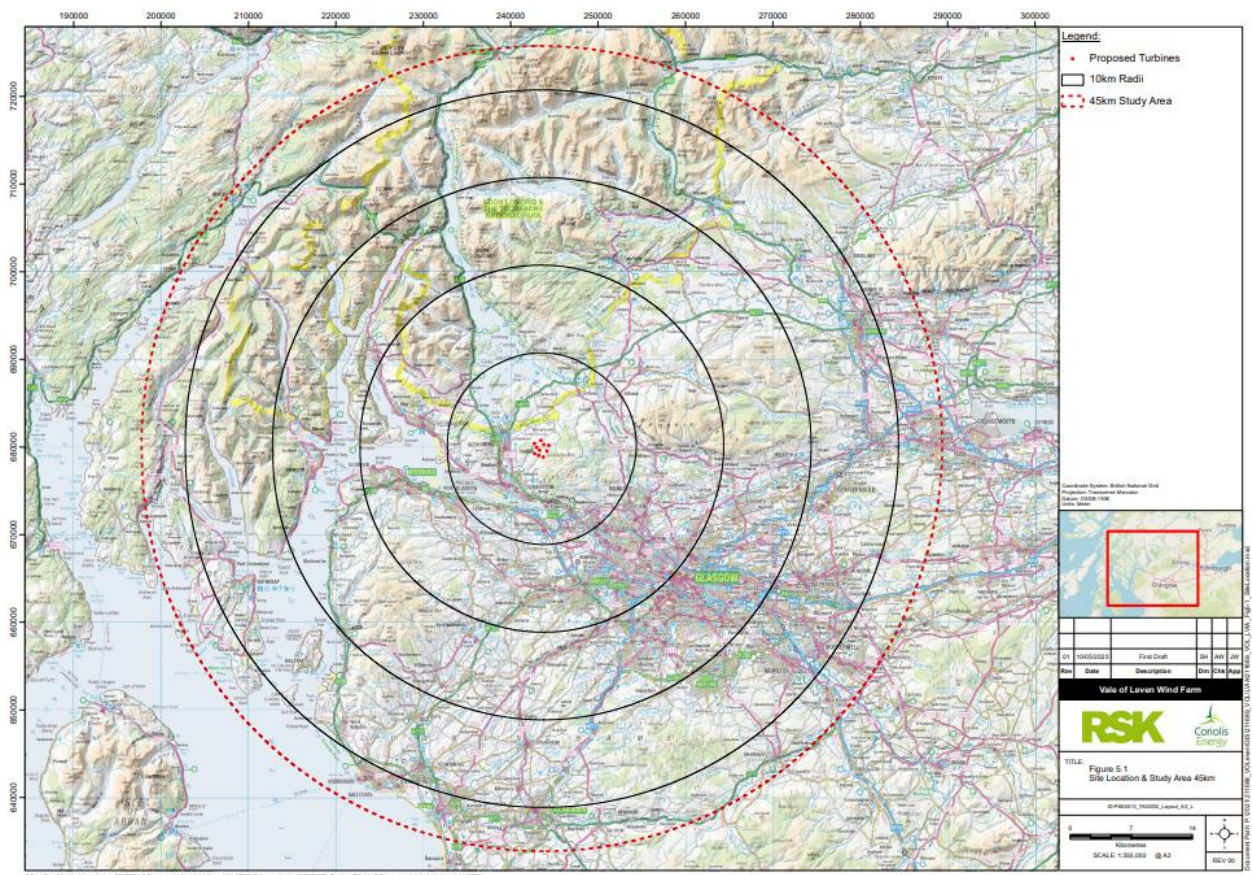


Figure 2- Location of proposed wind farm site (outlined in red)

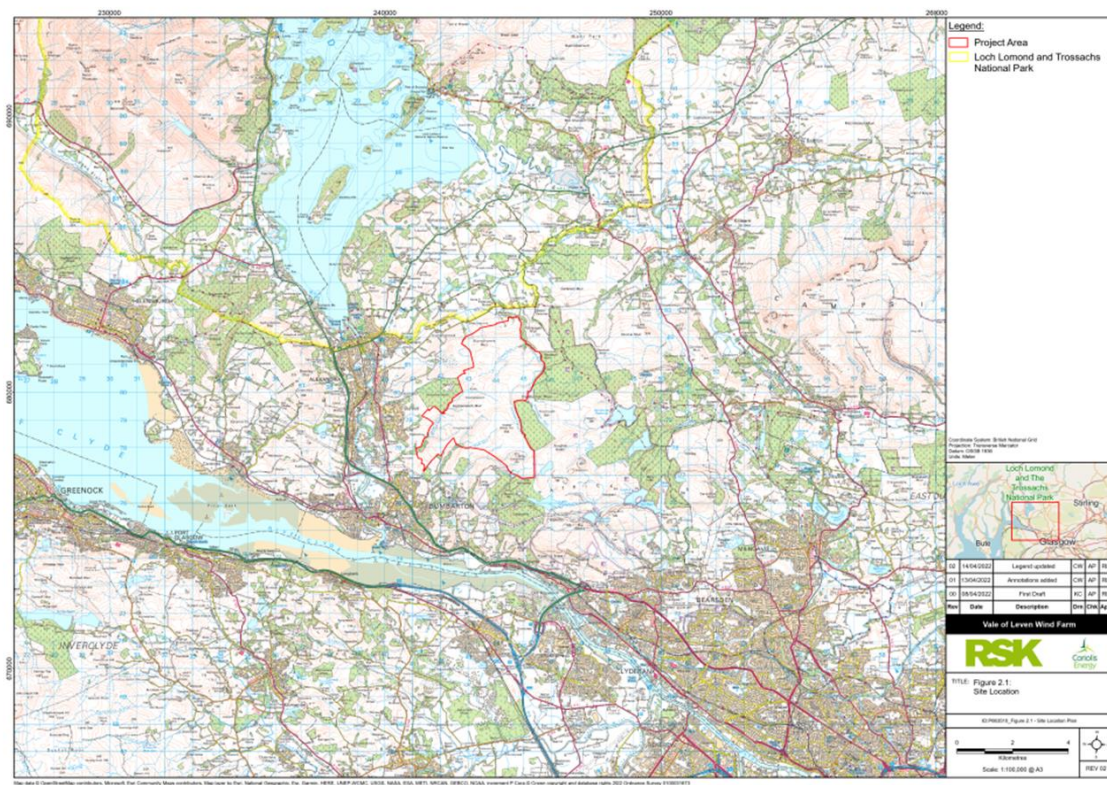


Figure 3: Proposed wind farm (red dots) in context of National Park boundary (yellow)

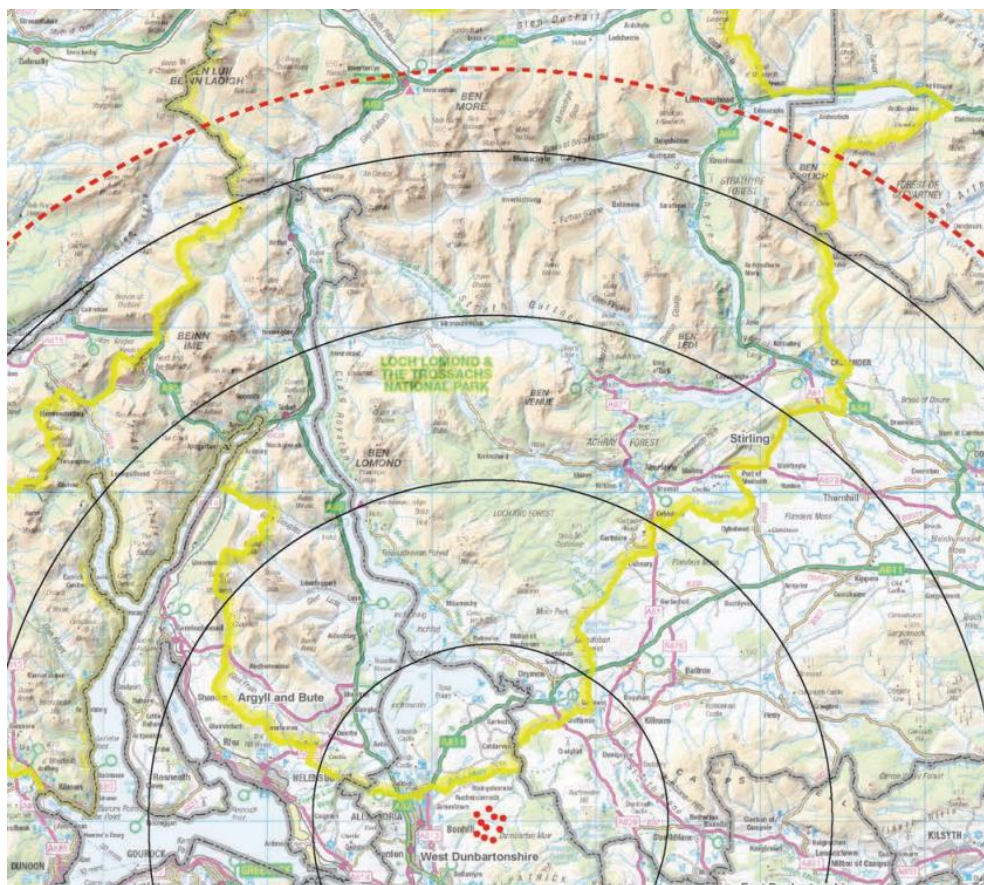
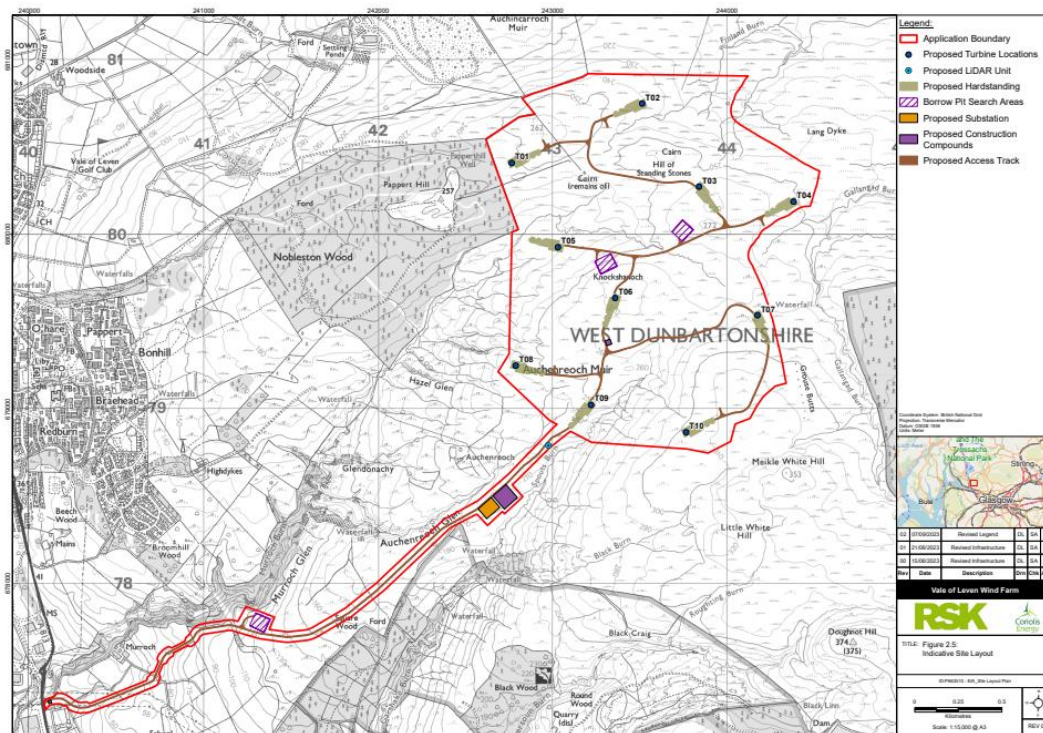


Figure 4- Proposed location of each of the 10 turbines



4. Planning History

- 4.1. The National Park was consulted on a previous proposal for a wind farm in the Kilpatrick Hills, referred to as Merkins Wind Farm, in 2012. This proposal was for 10 turbines, up to 120m to blade tip height. The National Park objected to this proposal due to the predicted significant adverse visual impact. The application was refused by West Dunbartonshire Council in 2013.
- 4.2. The current proposal is described in detail below, it is however worth noting that the proposed turbines would be up to 250m to blade tip height which is more than double the height of the previous proposal.

5. Description of Proposal

The main components of the proposed development

- 5.1. 10 wind turbines up to 250m to blade tip and each with an output of approximately 7 megawatts (MW), giving a total output of up to 70 MW;
- 5.2. Hardstanding areas at the base of each turbine, with a total permanent area of approximately 7,800 m²;
- 5.3. Site entrance and access track up to 9.2km in length from the south-west, via a new road through Murroch Farm, accessed from a new junction on the A813 Stirling Road, adjacent to the Aggreko Lomondgate facility in Dumbarton;
- 5.4. Sub- station/ control building with parking and welfare facilities;

- 5.5. A network of on-site access tracks and up to 4 associated watercourse crossings;
- 5.6. Transformers and underground cables to connect the turbines to the onsite substation;
- 5.7. Telecommunications equipment;
- 5.8. 3 temporary construction compounds and laydown area, 3 borrow pits;
- 5.9. Battery Energy Storage System (BESS) with a capacity up to 20 MW.

Proposed Community Benefits

- 5.10. For awareness, the applicant (Vale of Leven Wind Farm Ltd) is proposing to provide voluntary community benefits, stating an intent to offer opportunities to the local communities through local community benefits, worth an estimated £14.4 million over the 40-year operational lifetime of the proposed development. This includes Kilmarnock Community Council and Balloch and Haldane Community Council, both of which include areas within the National Park.
- 5.11. The applicant has also made a commitment to shared ownership of the proposed development.

Economic factors

- 5.12. The applicant estimates that the proposal could create 322 years of employment in Scotland and an investment of £20.7 million (GVA) in Scotland during construction phase including 54 years of employment in West Dunbartonshire and investment of £4.2 million (GVA) in West Dunbartonshire.
- 5.13. During the operational phase the applicant anticipates a total of 17 jobs and the generation of £1.6 million (GVA) for the Scottish economy, including 2 jobs and £0.4 million (GVA) in West Dunbartonshire specifically.

6. Summary of Relevant Supporting Information (submitted to Scottish Government Energy Consents Unit)

Environmental Impact Assessment Report

- 6.1. The Environmental Impact Assessment (EIA) Report prepared by the applicant was submitted with the application to the Energy Consents Unit.
- 6.2. The EIA Report includes a Landscape and Visual Impact Assessment (LVIA). The LVIA sets out the potential landscape and visual impacts arising from the proposed windfarm. An LVIA is required to present an analysis of the impact the proposed windfarm will have on the character of the different landscape types and designated areas, in this case, within a 45km radius of the site. It also sets out an analysis of the visual impact of the proposed development in relation to important viewpoints and routes. This presents an indication of the potential impact of the windfarm on visitor experience and residential amenity.

- 6.3. The LVIA includes a figure showing the Zone of Theoretical Visibility (ZTV) (attached in Appendix 2), this shows the extent of theoretical visibility of the wind turbines and takes account of relief and topography, but not of trees, buildings and other land cover. As such, the ZTV can be considered to present a 'worst case scenario' as views of wind turbines can be wholly or partially obscured by vegetation or buildings.
- 6.4. The LVIA and the ZTV along with the applicant's assessment are reviewed as part of the National Park Authority's assessment on the impact of this proposal in relation to the National Park.
- 6.5. The approach to the LVIA is considered to conform with relevant guidance and its scope is generally considered fit for purpose. It is however, of concern that some Landscape Character Types (LCTs) (the characteristics which define what is special about an area – see more at section 8:13) within 20 km from the site have been excluded from the impact assessment. In addition, the 3 borrow pits and the Battery Energy Storage System do not appear to have been considered in the photomontages. In some viewpoints, the proposed access tracks of up to 9.2km in length have not been shown. Each of these components could often be very noticeable from within the National Park and therefore, these could exacerbate the appearance of the proposed development when compared to what the photomontages indicate.
- 6.6. In terms of the LVIA assessment findings, most magnitude of change ratings are considered to have been understated which means that the significance of effect ratings are also understated.
- 6.7. The Environmental Impact Assessment Report and any associated documents can be viewed online via the Energy Consents Unit portal by entering the planning reference ECU00003468 at: <https://www.energyconsents.scot>

7. Policy context

Determining Authority

Scottish Government Energy Consents Unit

- 7.1. The application will be determined by the Energy Consents Unit (on behalf of Scottish Ministers) in accordance with the National Planning Framework 4 and the West Dunbartonshire Local Development Plan and supporting documents.
- 7.2. The National Park Authority has been consulted as a neighbouring Planning Authority. In addition, Section 14 of the National Parks (Scotland) Act 2000 requires public bodies to have regard to the National Park Plan when exercising their functions so far as affecting the National Park and as such there is a requirement in determining the proposal to take the Authority's views on impacts into account. The response will be given due consideration along with those of the other statutory consultees.
- 7.3. In accordance with the "agreement on roles in advisory casework" between NatureScot and the Scottish National Park Authorities, NatureScot are the lead body for providing advice on effects on the Special Landscape Qualities caused by proposals outwith the National Park and on European sites. In this case, landscape comments were provided to the National Park by NatureScot and the predicted impacts on the Special Landscape Qualities have been discussed with NatureScot. While NatureScot have still to provide their separate advice to the Energy Consents Unit on the broader implications of the proposal, the Landscape Officer's advice as provided to the National Park strongly agrees that the Special Landscape Qualities of the National Park would be significantly adversely affected by the proposal and the overall integrity of the National Park would be compromised.
- 7.4. NatureScot's Landscape advisor and the National Park Authority also agree that the applicants assessment of the Special Landscape Qualities of the National Park underplays the significance of effects.
- 7.5. The "agreement on roles in advisory casework" notes that there will be issues on which both organisations will provide advice. In these cases, both organisations will seek to ensure that their advice is complementary, is consistent with the National Park Partnership Plan and that any differences are clearly explained.
- 7.6. Due to the significance of this proposal in terms of the impacts as described and assessed, the National Park Authority will be submitting its own response to the Energy Consents Unit, however as above, officers have ensured that the advice provided to Members, with regard to landscape impact, is complementary to that of NatureScot.
- 7.7. In terms of explaining any differences, whilst there are some minor variations in the landscape comments from the National Park's Landscape Adviser and NatureScot's landscape comments, the same methodology has been used in undertaking the assessments and the conclusions are very much aligned. The differences come down to NatureScot considering the Special Landscape Qualities that are "most at risk" and the National Park Authority considering all Special Landscape Qualities relating to Loch Lomond.
- 7.8. As above, both parties agree that the Special Landscape Qualities of the National Park would be significantly adversely affected by the proposal and the overall integrity of the National Park would be compromised.

National Policy

National Planning Framework 4 (NPF4)

- 7.9. The adoption of NPF4 in early 2023 introduced a step change in the urgency to address the climate emergency and nature crisis. Policy 1 of NPF4 states that when considering all development proposals, significant weight will be given to the global climate and nature crises.
- 7.10. NPF4 identifies “National Developments” as part of the National Spatial Strategy for Scotland. One of the 18 National Developments identified is “Strategic Renewable Electricity Generation and Transmission Infrastructure”. This supports electricity generation and associated grid infrastructure throughout Scotland, providing employment and opportunities for community benefits, helping to reduce emissions and improve security of supply. The proposed development would therefore be considered as a National Development.
- 7.11. Given NPF4’s focus on tackling the climate and nature crises, there is strong policy support for renewable energy development. NPF4 Policy 11 (Energy) encourages and promotes all forms of renewable energy development onshore and offshore. NPF4 Policy 11 supports wind farms, however there is no support for proposals for wind farms in National Parks and National Scenic Areas. Development proposals that impact on national designations, such as National Parks and National Scenic Areas will be assessed in relation to Policy 4 (Natural Places).
- 7.12. Policy 4 (Natural Places) states that development proposals that will affect a National Park or National Scenic Area will only be supported where (i) the objectives of designation and the overall integrity of the area will not be compromised, or (ii) any significant adverse effects of the effects on the qualities for which the area has been designated are clearly outweighed by social, environmental or economic benefits of national importance.
- 7.13. Policy 11 (Energy) requires energy generation proposals to maximise net economic impact, including local and community socio-economic benefits such as employment, associated business and supply chain opportunities. Policy 11 also requires development proposals to address significant landscape and visual impacts, through design and mitigation, recognising that such impacts are to be expected for some forms of renewable energy. The Policy goes on to say that where impacts are localised and/or appropriate design mitigation has been applied, they will generally be considered to be acceptable.
- 7.14. NPF4 Policy 7 (Historic Assets and Places) part (i) states that development proposals affecting nationally important Gardens and Designed Landscapes will be supported where they protect, preserve or enhance their cultural significance, character and integrity and where proposals will not significantly impact on important views to, from and within the site, or its setting.

National Parks (Scotland) Act 2000

- 7.15. Section 14 of the National Parks (Scotland) Act 2000 requires public bodies to have regard to the National Park Plan when exercising their functions so far as affecting the National Park and as such there is a requirement in determining the proposal to take the Park Authority’s views on impacts into account.

7.16. The National Park Partnership Plan and Local Development Plan are material considerations where proposals outside of the National Park boundary affect the National Park Special Qualities.

The four statutory aims of the National Park are:

1. to conserve and enhance the natural and cultural heritage of the area;
2. to promote sustainable use of the natural resources of the area;
3. to promote understanding and enjoyment (including enjoyment in the form of recreation) of the special qualities of the area by the public; and
4. to promote sustainable economic and social development of the area's communities.

Local Policy

National Park Partnership Plan (2018-2023)

7.17. The National Park Partnership Plan supports a low carbon economy and emphasises the importance of protecting the Park's special landscapes.

Outcome 2: Landscape Qualities under Conservation Priority 2.1 states:

"The National Park Authority, and its partners, will work to conserve and enhance the special landscape and cultural heritage qualities of the area by; Ensuring that developments and projects recognise the need to protect and, where possible, enhance the qualities of wildness, tranquillity, dark skies and the historic environment".

This outcome also states that key transport routes, such as trunk roads and the West Highland railway line, along with settlements in the Park, continue to provide good lines of sight to the stunning views of the iconic landscapes found here.

Outcome 3: Climate Change sets out that the National Park Authority, as a public body, has a key role in contributing to adaption and mitigation of climate change effects.

Draft National Park Partnership Plan (2024-2029)

The Draft National Park Partnership Plan (2024-2029) has been approved by the National Park Authority Board and submitted to the Scottish Ministers for approval. The draft plan prioritises promoting a high-quality landscape experience to enhance place and the landscape quality of the National Park.

Local Development Plan (2017-2021)

7.18. The Local Development Plan (LDP) sets out the vision for how the National Park should change over the next 20 years. The following LDP Policies are relevant to the consideration of this application:

- Overarching Policy 1 which requires all development to contribute to the National Park being a natural, resilient place by relating well to the landscape context and setting and respect the important physical/historical/landscape/cultural features of the site and surrounding area.
- Overarching Policy 2 which requires visual amenity and important views to be safeguarded and the rich landscape character of the National Park to be protected and features and areas specifically designated for their landscape values at any level to be protected and/or enhanced.
- Natural Environment Policy 1: National Park Landscapes, Seascape and Visual Impact requires development to protect the special landscape qualities of the National Park.

- Historic Environment Policy 4: Gardens and Designed Landscapes requires that developments protect and/or enhance such places and do not impact adversely on their character, important views to, from or within them or their wider landscape setting.
- Renewable Energy Policy 2: Renewable Energy Developments Adjacent to the National Park:

‘The National Park Authority, as a statutory consultee, will support renewable energy developments adjacent to the Park where:

- a) They will not individually, or cumulatively with other developments or proposals, have a significant adverse visual impact on the landscape setting of the National Park and its principle gateways, and*
- b) They do not result in significant adverse impacts upon protected sites, species or biodiversity interests within the National Park as a result of cross boundary effects, and*
- c) They do not result in significant adverse impacts by virtue of proximity, noise generation, shadow flicker, lighting or visual impact.*

The National Park Authority will object to renewable energy developments outwith the Park where these criteria have not been met’.

- 7.19. The key policy criteria in the assessment for this proposal are Renewable Energy Policy 2 (a) and (c) in relation to visual impacts from renewable energy developments adjacent to the National Park.

Planning Guidance: Renewable Energy

- 7.20. The relevant Planning Guidance for this case is the National Park Authority’s Renewable Energy Planning Guidance. This provides additional details and guidelines to be considered when responding to Wind Farm Development adjacent the National Park Boundary.
- 7.21. This further emphasises the need for proposals outwith the National Park to consider the visibility of the development from the National Park, and its impact on the setting of the Park due to visual intrusion and its enjoyment by residents and visitors.
- 7.22. An assessment is expected to follow best practice guidelines, which includes assessing cumulative impact by taking account of other large-scale developments including, but not exclusively, wind farms within a 60km radius.

8. National Park Authority’s planning assessment

- 8.1. As a consultee on this proposal which is outwith the National Park, the National Park Authority’s focus for comments is landscape and visual impacts. It is however, recognised that the proposed wind farm may bring economic and community benefits to the National Park in terms of employment, spend and a potential community benefit fund. The wider policy considerations of NPF4 are also to be taken into account.

Landscape Considerations

- 8.2. The part of the Kilpatrick Hills where the proposed development would be located, encloses and defines the southern edge of Loch Lomond and the National Park and this context is an important part of the wider setting of the National Park.

- 8.3. The entire water body of Loch Lomond and an area surrounding it are within the Loch Lomond National Scenic Area. The nearest turbine would be approximately 3.7km south of the Loch Lomond National Scenic Area. The proposed wind farm would therefore have potential impacts not only on the National Park but on the National Scenic Area also.
- 8.4. The Zone of Theoretical Visibility (ZTV) analysis within the LVIA shows widespread theoretical visibility of the proposed development within 20km across the southern area of the National Park and the Loch Lomond National Scenic Area.
- 8.5. It is also relevant to note that the location of the proposed wind turbines on a landform (at 270m above ordnance datum (AOD)) means that from the loch shore of Loch Lomond (which is at 10m AOD) the turbines would appear as 510m above the lochside when taking account of the height of the turbine to its tip.
- 8.6. It is important to highlight that the nearest turbine would be located approximately 1.9km to the south of the National Park's boundary and at 250m to blade tip, this extremely large size of wind turbine is much taller and therefore, more intrusive than turbines that are currently experienced across the Scottish landscape.
- 8.7. Due to the height of the proposed turbines there is also a requirement for the turbines to be lit, for aviation purposes. This would mean that each individual turbine would be lit as well as the perimeter of the proposed development.
- 8.8. The tallest operational wind turbine within a 45km radius from the site of the proposed development is currently 147m to blade tip at Calder Water, South Lanarkshire (40km away from the site of the proposed development).
- 8.9. The closest operational windfarm to the southern boundary of the National Park, is Corlic Hill/Inverclyde which is 14km southeast and has 8 turbines which are 110m high to blade tip. This proposal would therefore be a step change in both the proximity of wind turbines to the National Park and the scale of the wind turbines (being more than twice the size of the closest operational wind farm).

Special Landscape Qualities

- 8.10. The National Park is valued for the scenic quality of its landscape due to its diverse landscape character. The Special Landscape Qualities of Loch Lomond and Trossachs National Park Report 2010 commissioned by NatureScot defines special landscape qualities as the characteristics that, individually or combined, give rise to an area's outstanding scenery.
- 8.11. The general special landscape qualities which apply to the entire National Park are:
 - A world renowned landscape famed for its natural beauty;
 - Tranquillity;
 - Wild and rugged highlands contrasting with pastoral lowlands;
 - Settlements nestled within a vast backdrop;
 - Famous through routes; and
 - The easily accessible landscape splendour.

8.12. The applicants LVIA predicts significant effects on two Special Landscape Qualities within the National Park, namely:

- Wild and rugged highlands contrasting with pastoral lowlands
- Immensity of loch and landscape

The National Park Authority's Landscape Adviser predicts significant effects on these and an additional eight of the Special Landscape Qualities. The additional SLQ's significantly affected are as follows:

- A world renowned landscape famed for its rural beauty
- Settlements nestled within a vast natural backdrop
- Famous through routes/ The easily accessible landscape splendour
- Tranquillity
- Two lochs in one
- A multitude of beautiful islands
- Ben Lomond, widely known, popularly frequented
- Banks of broadleaved woodland

8.13. With a very intrusive and industrial appearance, the proposed turbines would significantly detract from, contrast with and often compromise a very large number of Special Landscape Qualities and key characteristics that are integral to defining this iconic part of the National Park.

8.14. For example, "Settlements nestled within a vast natural backdrop", including the southern setting of Loch Lomond and the surrounding rural landscape. This area has a long and rich history of habitation with houses and other structures confined to lower-lying land. These settlements are often small-scale, nestled within the backdrop of vast landforms of mountain, hill, glen and loch. This gives a strong sense of surrounding, all-enveloping nature which would be fundamentally compromised by the introduction of highly intrusive turbines. This includes the settlements of Balmaha, Croftamie, Drymen, Gartocharn and Balloch which would be subject to significant effects.

8.15. Similarly, "Immensity of loch and landscape", with Loch Lomond being the largest expanse of freshwater in Britain with surrounding mountains and hill ranges, the landscape and sense of place is expansive and large-scale. By comparison, human made elements appear small and modest, they are barely discernible against the larger backdrop and substantial horizontal landmass. With the introduction of highly intrusive turbines, the naturally majestic surroundings where human made elements appear small and modest would be fundamentally compromised, as would the enjoyment of the highly scenic setting provided by the wide range of recreational infrastructure around the loch, affecting the experience of a very large number of people.

Landscape Character Assessment

8.16. Landscape Character Type (LCT) defines what is unique about an area. This takes into account existing landforms, field patterns, tree cover, settlements etc. Each potential impact on landscape character must be taken into consideration in order to assess the magnitude of change that could occur.

8.17. The Landscape Character Types which the proposed development is assessed in the LVIA as having a significant effect on, are as follows:

- Lowland Loch Basin (the broad and expansive southern part of Loch Lomond)
-the effect on the great majority of the receptor would be not significant

although a **major, major/moderate or moderate** and **significant** effect is predicted on those parts of the south-eastern arc of the receptor that gain clear open visibility of the Proposed Development.

- River Valley Farmland and Estates (Drymen area and Endrick Water)- the effect on the northern part of the receptor and some areas of the southern part would be not significant but a **major/ moderate** and **significant** effect on some areas of the southern part of the LCT are predicted between approximately 5.6 km and 8 km from the nearest turbine.
- Rolling Farmland (Gartocharn area including Duncryne Hill)- the effect on the western part of the receptor and areas of the eastern part would be not significant but there would be a **major** or major/moderate and **significant** effect on some areas of the eastern part of the LCT.

8.18. The National Park Authority's view is that the proposed development would also have a significant effect on other Landscape Character Types in the National Park including Lowland Loch Basin Islands, Highland summits and Steep Ridges and Hills.

8.19. For example, "Lowland Loch Basin Islands" the pattern of water and islands and the indented shoreline of Loch Lomond create a unique and highly scenic composition particularly appreciated from elevated views. As such, the introduction of highly incongruous turbines in their backdrop would compromise their enjoyment. When viewed from the water and the surrounding loch landscape, the industrial appearance of the turbines would notably detract from the semi natural character of the island woodlands and contrast with their small-scale appearance and varied landforms.

8.20. "Highland summits", as illustrated in Viewpoint 29 from Ben Lomond the turbines would appear very noticeable in the lower-lying backdrop to Loch Lomond. The introduction of large-scale industrial infrastructure would detract from the appreciation of several key characteristics that exhibit a semi-natural, natural and/or wild and rugged character. Although effects are not judged to be significant on the whole Landscape Character Type, significant effects are predicted on open parts, including from Ben Lomond (see Appendix 7).

LVIA Viewpoints

8.21. Of the 21 viewpoints within the National Park, the LVIA predicts significant visual effects from 13. Major and significant effects are predicted from the John Muir Way north of the site, Balloch Castle Country Park access road, the A811 near Balloch, Duncryne Hill and Cameron House seaplane jetty (see images in appendices).

8.22. The National Park Authority's Landscape Adviser predicts significant visual effects from 19 of the 21 viewpoints identified within the National Park. These include Balloch Castle Country Park access road (see Appendix 3), A811 near Balloch; Duncryne Hill, Gartocharn; Cameron House seaplane jetty (see Appendix 4); Balmaha Harbour (see Appendix 9); Conic Hill (see Appendix 6) and Ben Lomond (see Appendix 7).

8.23. The LVIA also predicts significant effects on road and recreational routes within the National Park, including from sections of the A82 between Luss and Balloch, the Rob Roy Way north of Drymen; the Three Lochs Way between Ben Bowie and Balloch and National Cycle Route 7/Rob Roy Way between Drymen and Balloch.

- 8.24. The National Park Authority's Landscape Adviser predicts significant effects on road and recreational routes including parts of at least 75km of nationally important recreational routes.

Settlements

- 8.25. With regard to the main settlements within the National Park, the LVIA predicts that effects on views would be **major and significant** from Croftamie (limited locations), Gartocharn (limited locations) and Balloch (limited locations e.g. Viewpoint 5- A811 near Balloch) and **major/moderate and significant** effects on views from Balmaha (limited locations e.g. Viewpoint 17- Balmaha Harbour- see Appendix 9) and Drymen (limited locations e.g. Viewpoint 14- West Highland Way near Drymen, see Appendix 5).

Gardens and Designed Landscapes

- 8.26. The LVIA concludes that the effect of the proposed development on the cultural significance of the Gardens and Designed Landscapes, including Balloch Castle and Rossdhu House on west Loch Lomond, would be negligible. However, it appears that the effects on the character and on important views, to, from and within these sites, or the setting of Gardens and Designed Landscapes has not been fully considered, if at all. In addition, the impacts on the Ross Priory Garden and Designed Landscape have not been assessed.

9. Planning Policy Assessment

- 9.1. As already introduced, National Planning Framework 4 proposes a step change in national policy on climate and energy and recognises the crucial role that renewable energy developments has to play in a climate crisis nevertheless NPF4 has maintained a moratorium against wind farms in National Parks and National Scenic Areas. There remains a requirement to consider potential landscape and visual impacts, alongside the benefits resulting from renewable energy generation.
- 9.2. The National Park Partnership Plan and Local Development Plan are also supportive of renewable energy and the urgent need to tackle the climate and nature crisis and the role that renewable energy development must play in this. However, the National Park Aims and the policies which follow from them, within both of these plans, require that a balance be maintained having regard to the natural and cultural heritage of the area. That this is conserved and enhanced and that people are encouraged to enjoy the special landscape qualities of the National Park.
- 9.3. NPF4 policy 11 recognises that landscape and visual impacts are to be expected for some forms of renewable energy and states that where impacts are localised and/or appropriate design mitigation has been applied, they will generally be considered acceptable.

- 9.4. In this case, the significance of the impacts is key. The National Park is designated as it is a landscape of outstanding national importance for its natural and cultural heritage and is highly valued by local residents and visitors from all around the world. The southern part of the National Park, including Balloch and Loch Lomond and surrounding settlements are areas where people first enter the National Park. Balloch is one of the principal gateways to the National Park and key routes in close proximity to the proposed development include the West Highland Way, the John Muir Way, National Cycle Network Route 7, the A82 and the A811.
- 9.5. The Local Development Plan's Renewable Energy Policy 2 is specific to renewable energy developments adjacent to the National Park. This policy states that the National Park will object to developments which would have significant adverse visual impact on the landscape setting of the National Park and its principal gateways.
- 9.6. National Planning Framework 4 Policy 4 (Natural Places) states that development proposals that will affect a National Park or National Scenic Area will only be supported where (i) the objectives of designation and the overall integrity of the area will not be compromised, or (ii) any significant adverse effects of the effects on the qualities for which the area has been designated are clearly outweighed by social, environmental or economic benefits of national importance. In this case, as set out above, the objectives of designation and the overall integrity of the National Park would be compromised and in terms of part (ii) the significant adverse effects would not be outweighed by social, environmental or economic benefits of national importance.
- 9.7. Although the proposed wind farm would be a National Development (defined by NPF4) – and acknowledging the role that renewable energy development must play in a climate crisis – see 9.2 above -the National Park Authority's view is that the adverse effects on the National Park of this proposal would be so significant, that they would not be outweighed by potential benefits. This is due to the overwhelming large size of the proposed wind turbines and the proximity to the National Park. The proposal as presented does not provide sufficient justification as to why this very large scale installation (in terms of turbine size) could not be located elsewhere, in a less sensitive location. The location is not considered appropriate.
- 9.8. The proposed development would therefore be contrary to Renewable Energy Policy 2 of the Local Development Plan and NPF4 Policy 4 (c).
- 9.9. NPF4 Policy 11 states that localised visual impacts will generally be considered to be acceptable for renewable energy developments. In this case, the impacts would be widespread across a significant part of the National Park and would therefore not be localised. It is therefore considered that the proposed development would not comply with NPF4 Policy 11.

10. Conclusion

- 10.1. In conclusion, the location of the turbines at approximately 1.9km from the Park boundary, would be significantly closer than other operational wind farms and, at a height of up to 250m (to blade tip), would be significantly larger. While the key

strategic role that renewable energy development has to play in addressing the climate crisis is fully recognised, this proposal would result in a step change in the proximity and prominence of wind farms on the National Park and present a significant visual intrusion, including on some of the most iconic views enjoyed by visitors and our communities.

- 10.2. The proposal is considered to be contrary to the National Park Authority's Local Development Plan Renewable Energy Policy 2: Renewable Energy Developments Adjacent to the National Park, as it does not meet the policy criteria. The policy states that : 'the National Park Authority, as a statutory consultee, will support renewable energy developments adjacent to the Park where:
- They will not individually, or cumulatively with other developments or proposals, have a significant adverse visual impact on the landscape setting of the National Park and its principle gateways, and
 - The National Park Authority will object to renewable energy developments outwith the Park where these criteria have not been met.'
- 10.3. The National Park Authority consider that there will be significant adverse visual impact on the landscape setting of the National Park and its principal gateways, in this case Balloch. There would be significant adverse effects on the Special Landscape Qualities of the National Park and the Landscape Character Types which define what is so unique about the National Park. Furthermore, the proposal will have a significant detrimental effect on a number of settlements in the National Park and the experience of views of walking routes, road routes and viewpoints popular with both visitors and residents in the Park.
- 10.4. With regard to NPF4 it is considered that the proposed wind farm would not comply with Policy 11 Energy, Policy 4 Natural Places or Policy 7 Historic assets and places.
- 10.5. It is therefore recommended that an **objection** to the proposal is submitted to the Scottish Government Energy Consents Unit on the grounds that:
- Given the extremely large turbine size and proximity of location, the proposed development would often appear dominant or very prominent in the backdrop to the southern part of Loch Lomond and its associated rural setting. With a very intrusive and industrial appearance the turbines would considerably detract from, contrast with and often compromise a very large number of Special Landscape Qualities and key characteristics that are integral to defining this iconic part of the National Park.
 - The views and visual amenity of a very large number of visitors and residents of several settlements would be subject to widespread significant visual effects.
 - Parts of at least (approximately) 75km of nationally important recreational routes would be subject to significant visual impact.
 - The proposed development would compromise the objectives of the National Park designation and its overall integrity.
 - The proposed development would conflict with National and local landscape-related policy.

11. Appendices.

Appendix 1: Site Location Plan Scale 1:100,000

Appendix 2: Zone of Theoretical Visibility (ZTV) to Blade Tip (Scale 1:350,000)

Appendix 3: Viewpoint 4 Balloch Country Park access road

Appendix 4: Viewpoint 9 Cameron House seaplane jetty

Appendix 5: Viewpoint 14 West Highland Way near Drymen

Appendix 6: Viewpoint 19 Conic Hill

Appendix 7: Viewpoint 29 Ben Lomond

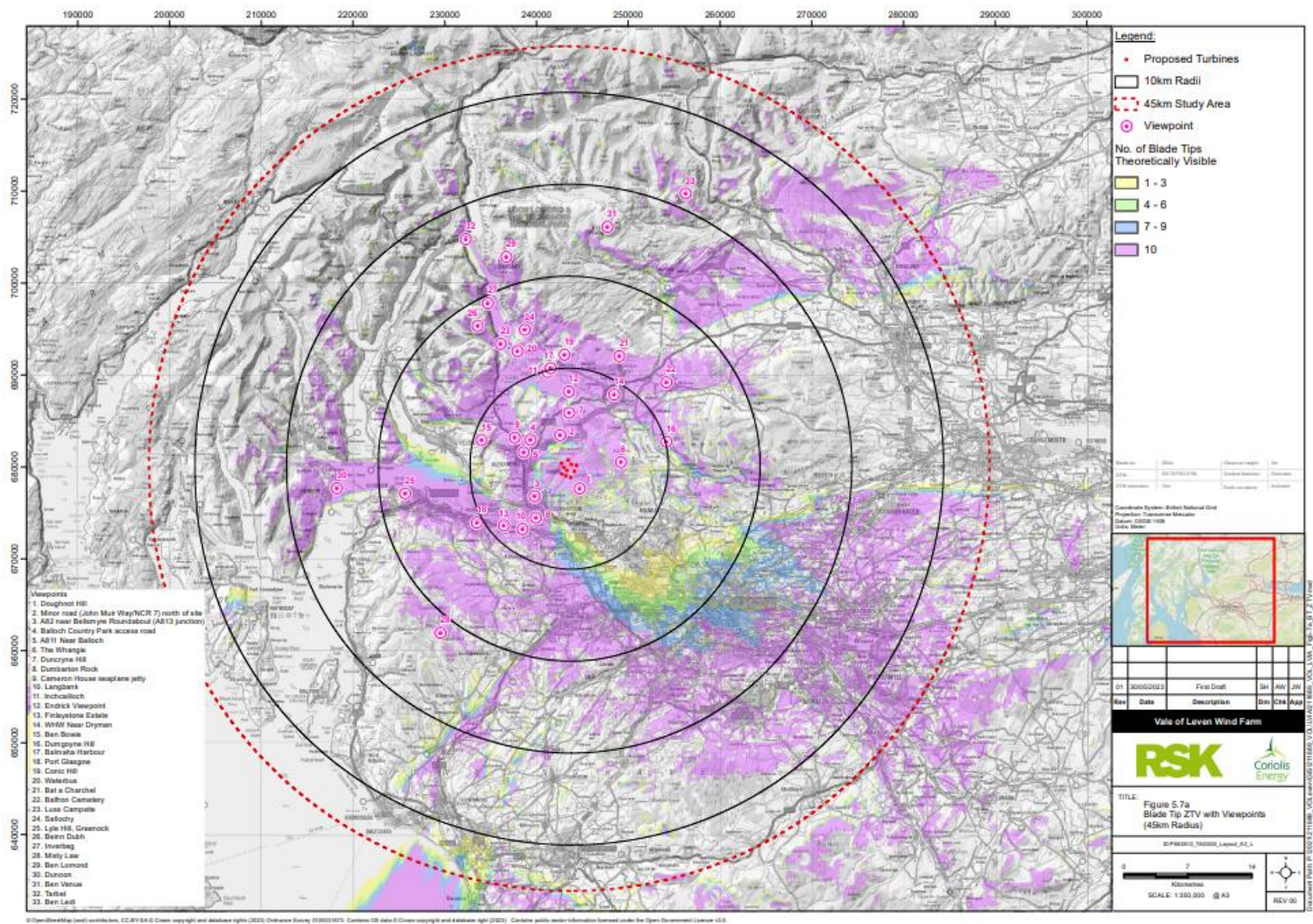
Appendix 8: Viewpoint 31 Ben Venue

Appendix 9: Viewpoint 17 Balmaha Harbour

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26 February 2024

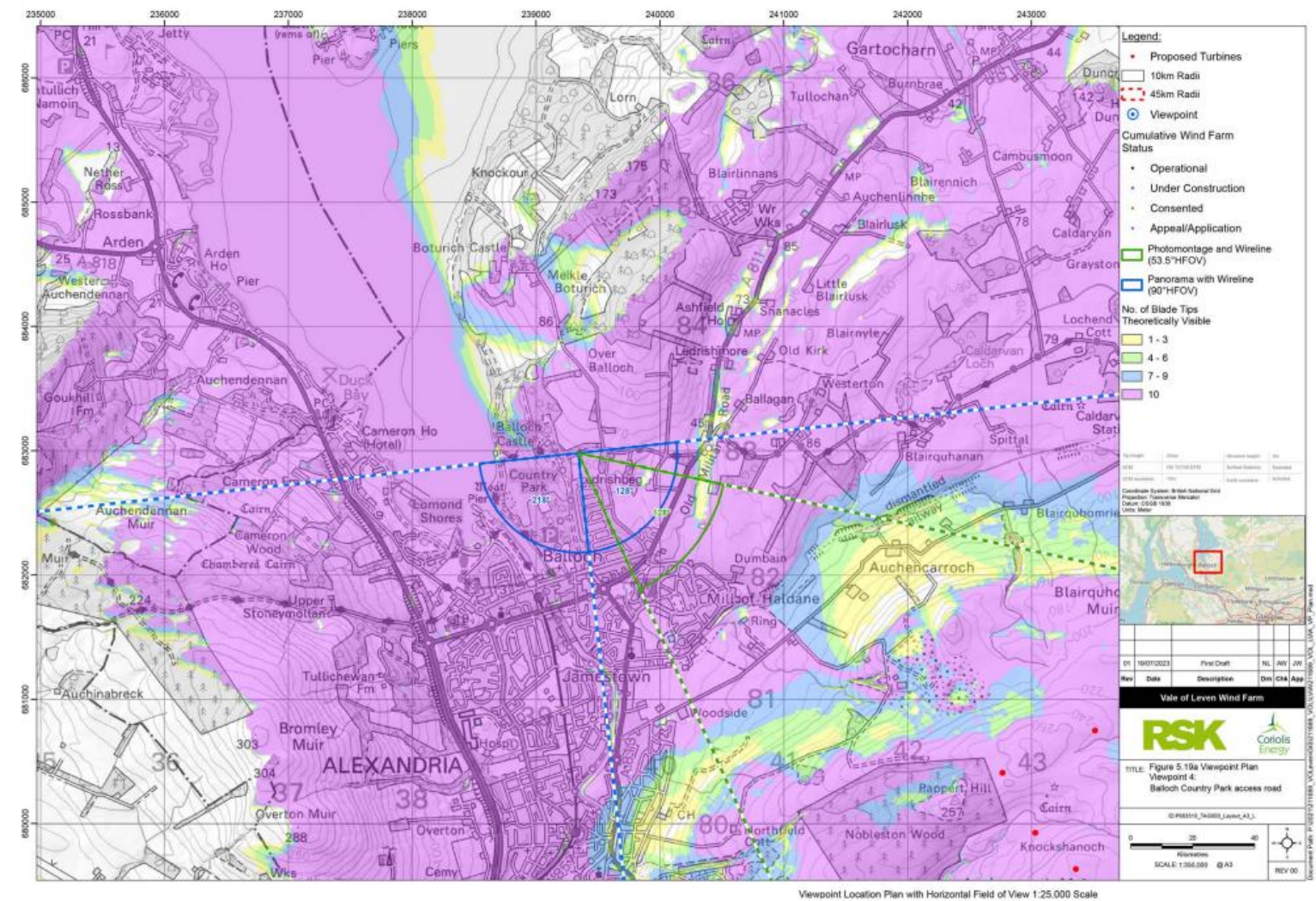


Appendix 2: Zone of Theoretical Visibility (ZTV) to Blade Tip (Scale 1:350,000)

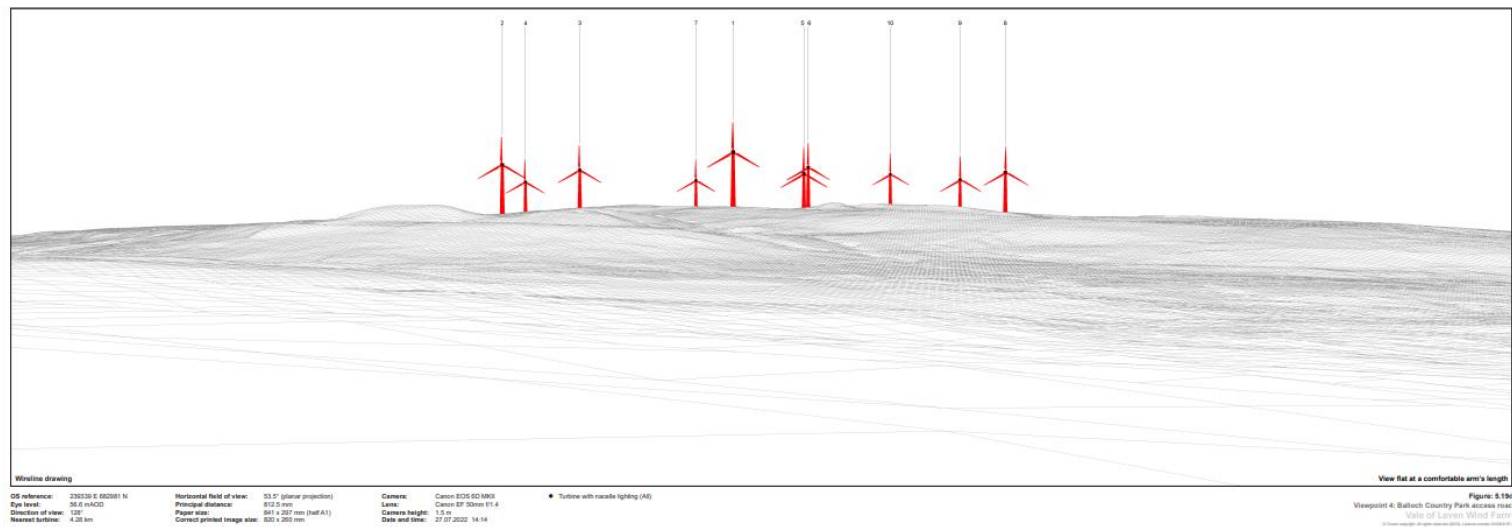


Appendix 3: Viewpoint 4 Balloch Country Park access road

ZTV:



Wireframe:



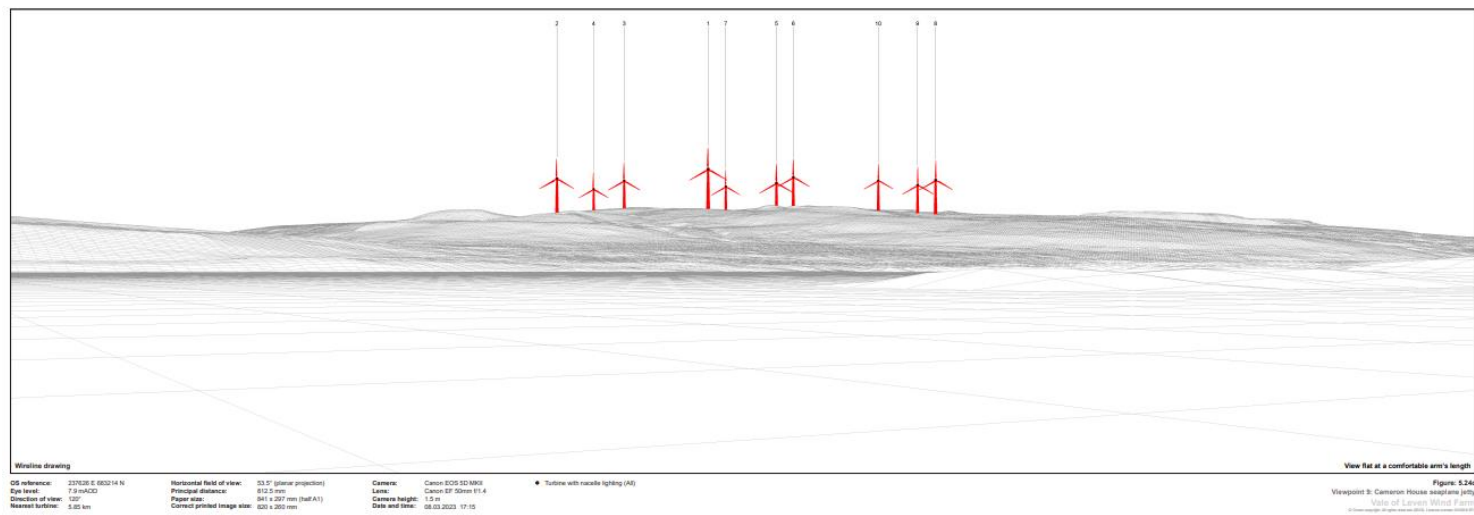
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ZTV:



Wireframe:

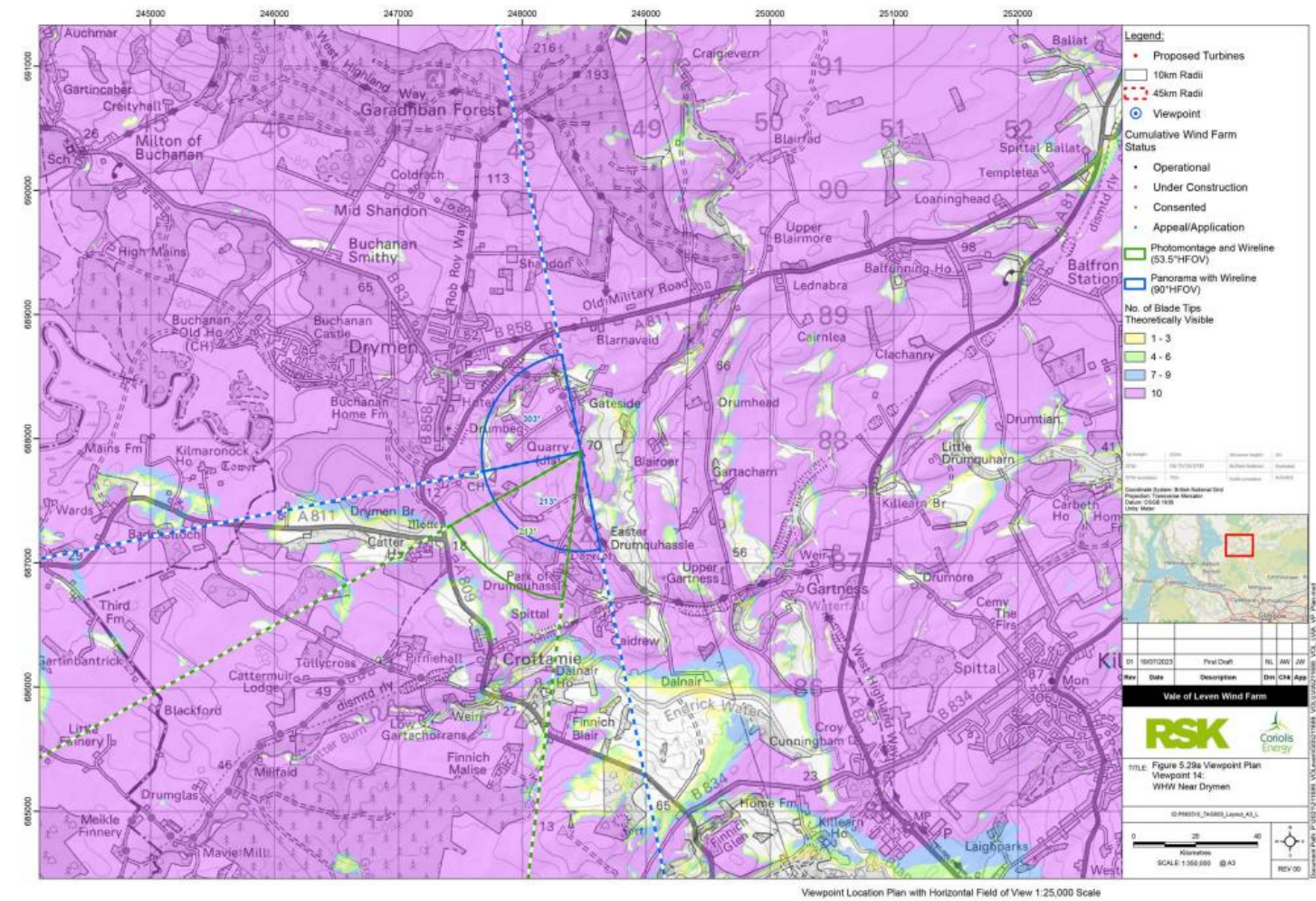


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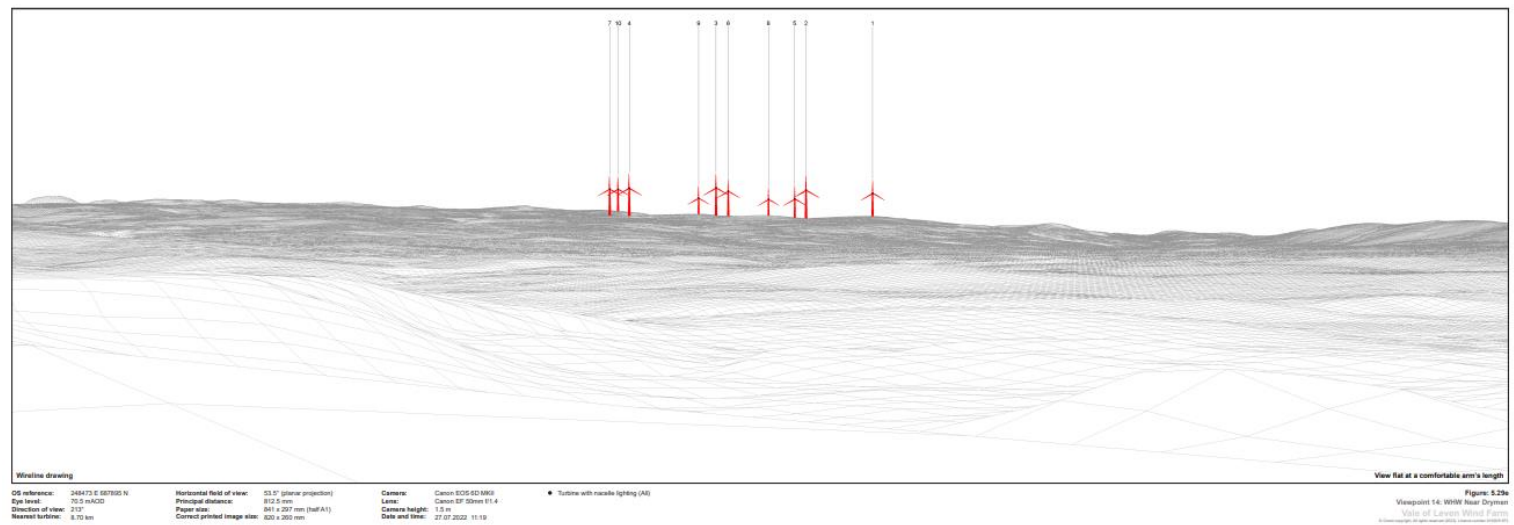


Appendix 5: Viewpoint 14 West Highland Way near Drymen

ZTV:



Wireframe:



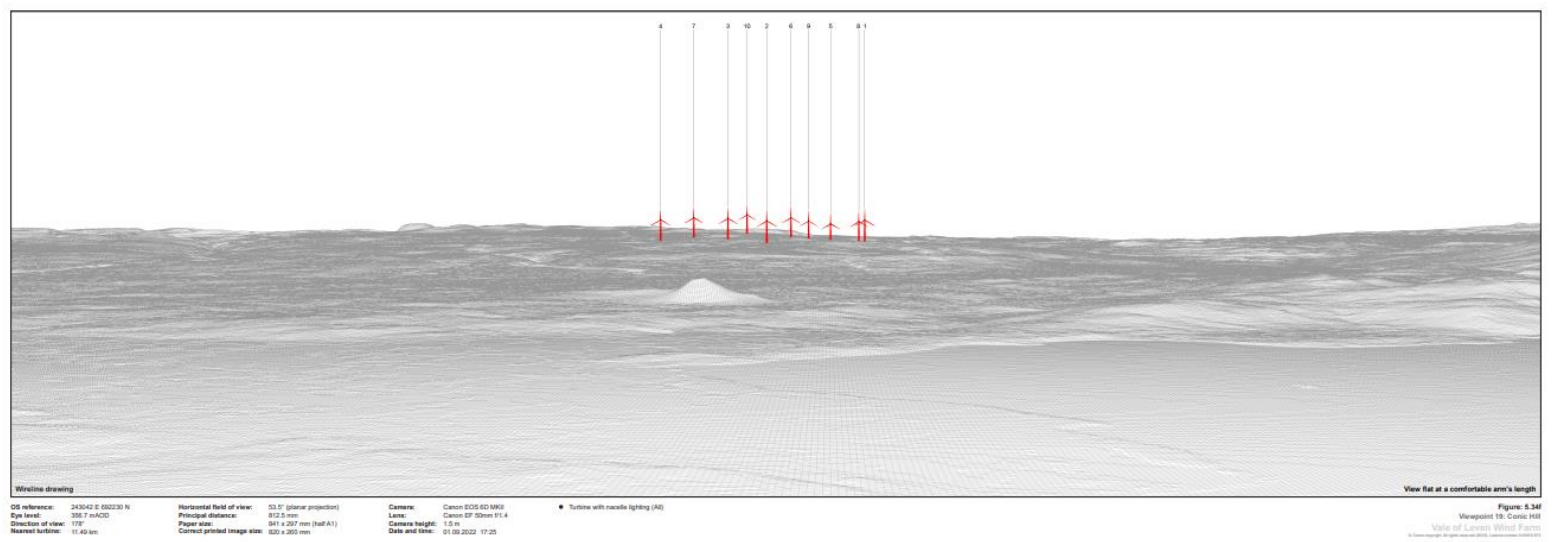
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ZTV:



Wireframe:



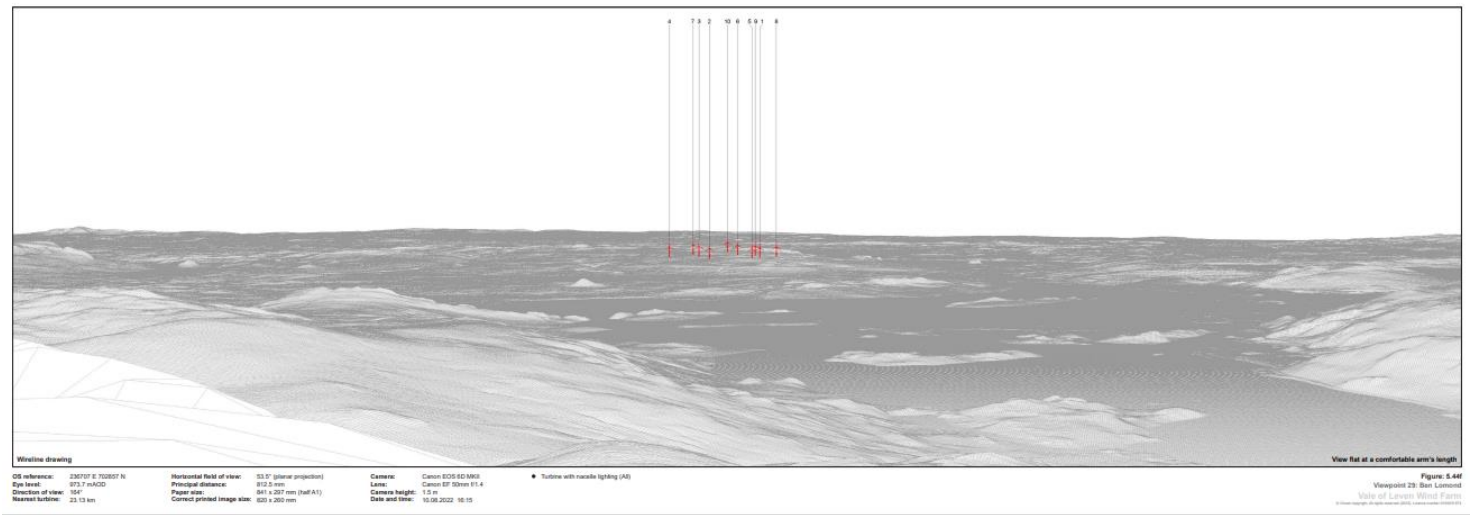
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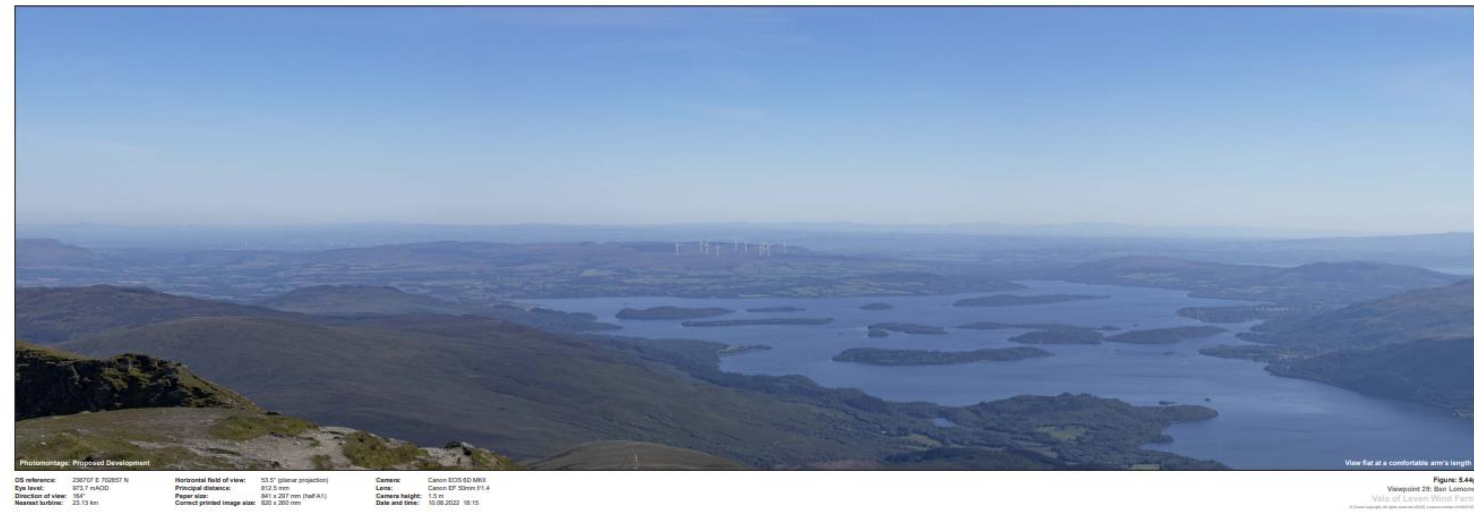
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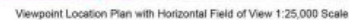
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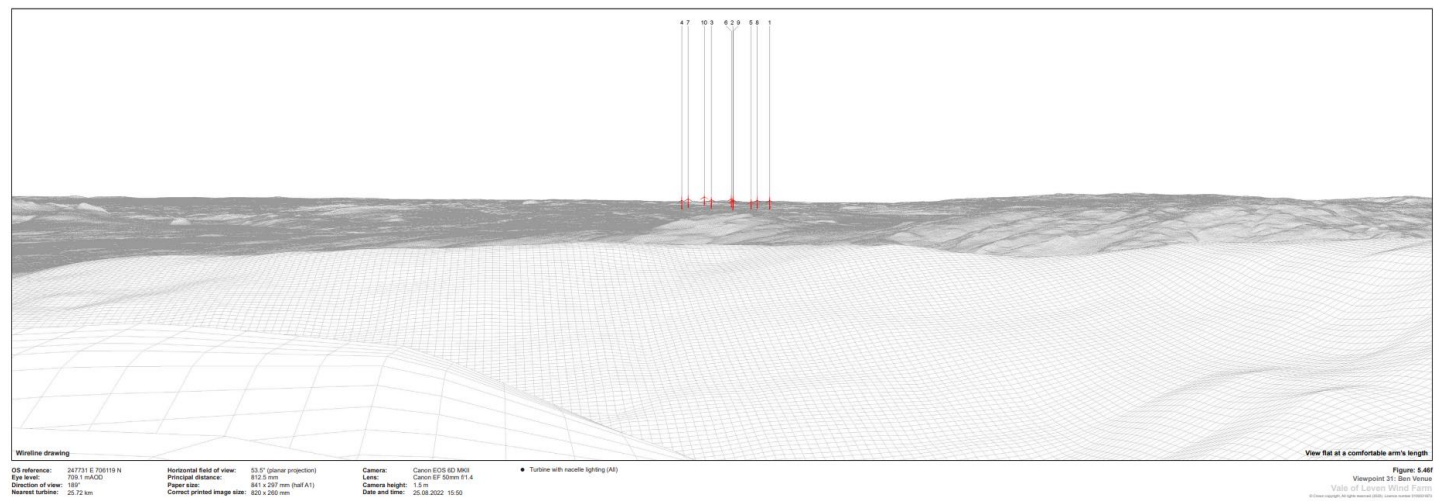
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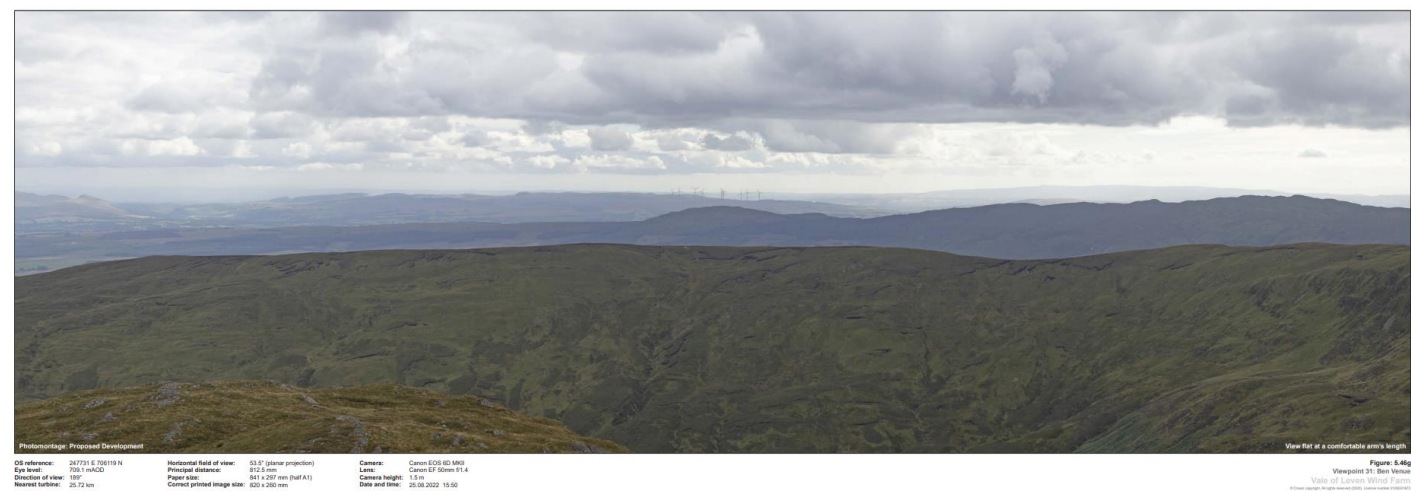
ZTV:



Wireframe:



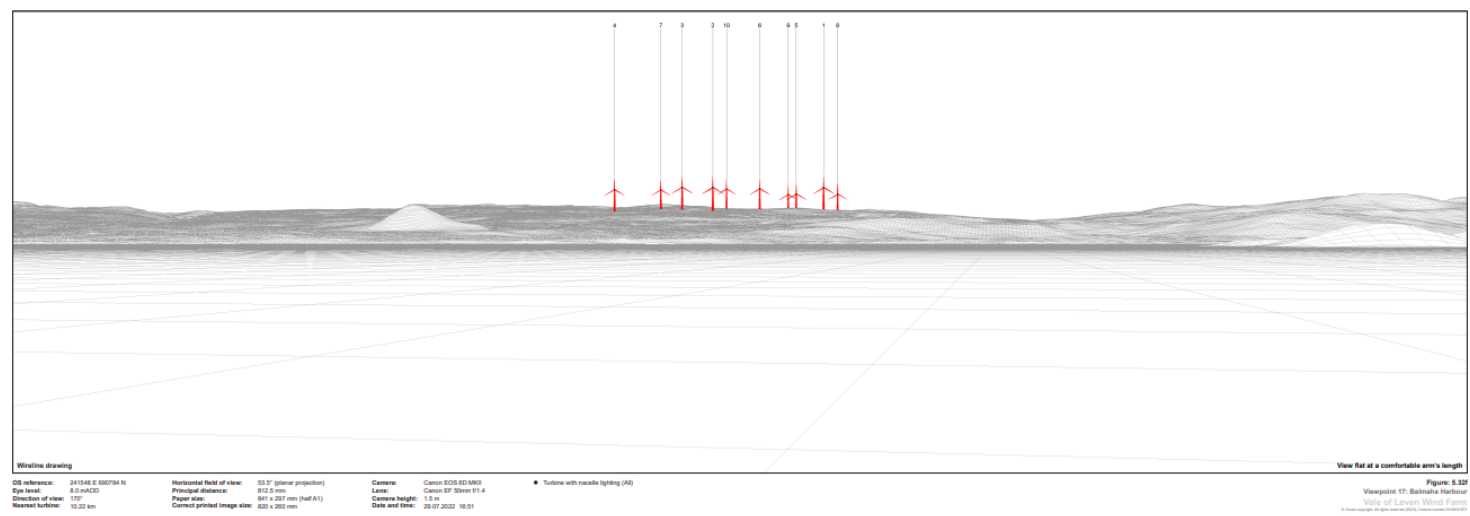
Photomontage:



ZTV:



Wireframe:



Photomontage:



Photomontage of nighttime effects:

