Planning and Access Committee

Meeting: 30 June 2025

Agenda item 5: EXT_2025_0001 – Glentarken Windfarm

SUBMITTED BY:	Director of Place

APPLICATION NUMBER:	ECU00004700 (Scottish Government Energy Consents Unit reference) EXT/2025/0001
APPLICANT:	SSE Renewables Development UK
LOCATION:	Land north of Loch Earn, east of Lochearnhead nr. Glentarken Woods.
PROPOSAL:	A proposed wind farm development of up to 12 wind turbine generators with a blade tip height up to 180m and a Battery Energy Storage system, with a total generating capacity greater than 50MW.
NATIONAL PARK WARD:	Ward 2 Breadalbane & The Trossachs
COMMUNITY COUNCIL AREA	Balquidder Lochearnhead and Strathyre St Fillans Killin
CASE OFFICER:	Name: Jennifer Paton Tel:01389727738 E-mail: jennifer.paton@lochlomond-trossachs.org

1. Summary and Reason for Presentation

1.1. This report relates to a consultation by the Scottish Government Energy Consents Unit (ECU) on an application submitted on 21 January 2025 for the construction of a windfarm at Glentarken, approximately 2.8 km east of Lochearnhead and within 3km from the boundary of the Loch Lomond and Trossachs 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 by the Planning Authority.

1.3. The National Park Authority has been consulted as a neighbouring Planning Authority. 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.

1.4. The National Park's consultation response is being reported for the Planning Committee's consideration due to the anticipated significant adverse effects of the proposal on the Special Landscape Qualities and the overall integrity of the National Park and therefore the recommendation is to object to the proposed development.

1.5. 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 deliver the Spatial Strategy. The proposed development is one of 18 National Developments identified in NPF4 described as *"Strategic Renewable Energy Generation and Transmission Infrastructure."*

1.6. The development is for the erection and 50-year operation of up to 12 wind turbines with a maximum blade tip height of 180m and a Battery Energy Storage System (BESS), with an overall capacity greater than 50MW, and associated infrastructure as set out in the description of proposal below.

1.7. The proposed development would be situated on land within the Drummond Estate, to the east of Lochearnhead, south of Killin and west of St Fillan, with the access point encroaching into the National Park boundary. The proposed access to the development abuts the National Park boundary within Breadalbane, the turbines will be within Perth and Kinross, while the site entrance and a portion of the access track is located within the Stirling area.

2. Recommendation

2.1. That Members:

APPROVE the contents of this report as 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:

1. The application site occupies an open, prominent location close to the National Park boundary. The proposed windfarm and associated infrastructure would prove very prominent against the in the backdrop of the designated Special Landscape Area of Breadalbane. The proposal would introduce a step change to the existing pattern of windfarm development close to the National Park due to the location, size and number of turbines proposed in an area currently devoid of windfarms.
2. The proposed development would have a significant adverse impact upon the open views and visual amenity for residents, visitors and recreational users of the National Park and would fail *"to conserve and enhance the natural and cultural heritage of the area"* contrary to the first aim of the National Park Act.
3. With regards to the defined Special Landscape Qualities, the proposal would result in a significant adverse effect on the wild and rugged highland quality and the contrast experienced between highland and lowland particularly from south side Loch Earn. In particular, the proposal would significantly impact upon the Special Landscape Qualities of the National Park when traversing popular key summits within the National Park such as Ben Vorlich and Meall an t-Seallaidh.
4. The proposal is contrary to National Planning Framework 4, Policy 4 (Natural Places) in that the site location, so close and prominent to the National Park boundary, will compromise the objectives of the designation. It is assessed that the significant adverse effects that the proposal will have upon the qualities for which the National Park has been designated are not outweighed by any social, environmental or economic benefits of national importance.

3. Background

Site Description

3.1. The site is located within the Drummond Estate, in the upland summits and plateaux of the ridge that separates Loch Earn from Loch Tay.

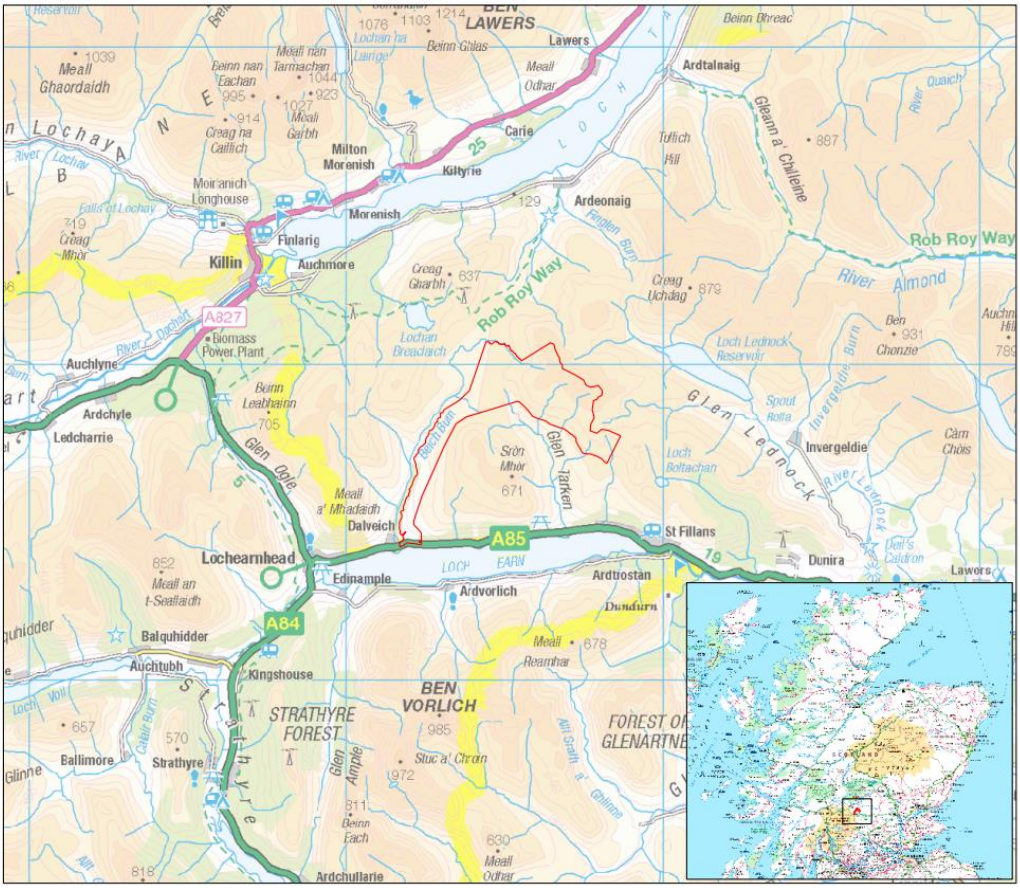


Figure 1 Site location (Loch Lomond and the Trossachs National Park boundary highlighted in yellow)

3.2. The boundary of the National Park follows the northern side of the A85 which runs along the northern edge of Loch Earn. The Turbine Development Area, where the 12 turbines will be located, is within the Perth and Kinross local authority area. The western extent of the site, which contains the proposed access track, is located within the Stirling local authority area.

3.3. The area of the proposed 12 turbines is positioned on the high land which lies almost centrally between the National Park settlements of Killin, Lochearnhead and St Fillans. The nearest part of the application site proposed that would host the turbines is approximately 7km to the east of the village of Locheanhead, approximately 3.8 km north-west of St Fillans, and around 8km southeast of Killin.

3.4. The proposed access and part of the track would be within the National Park boundary, which is defined in the immediate location by the former railway line which lies north of the A85.

Site description

3.5. The Site comprises an area of approximately 1,103 hectares (ha) of land and varies in topography, in addition to areas of plateau ridge tops it has areas of steep sloping terrain and rocky outcrops.

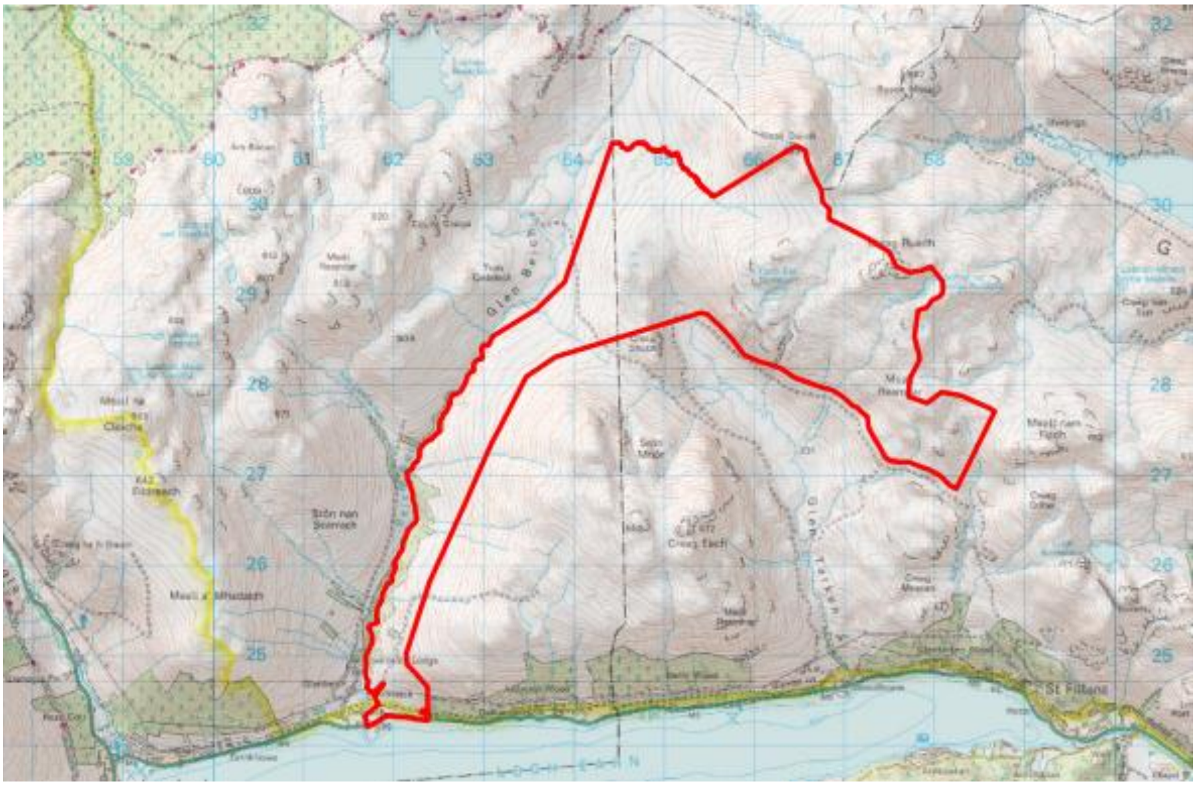


Figure 2 Application site and local topography (Loch Lomond and the Trossachs National Park boundary highlighted in yellow)

3.6. There are a number of hills and peaks within the site which form the southernmost extent of the Grampian mountains and dominate views from Breadalbane, with St Fillan's, Lochearnhead and Loch Earn back dropped by these hills. There are two valleys within the Site: Glentarken and Glen Beich. Glen Beich and Beich Burn form the western boundary of the Site where the access track will be located.

3.7. Along the western edge of the site there is an area of woodland which is on the Ancient Woodland Inventory (AWI), this is out with the National Park, however the trees along the A85 close to the point of access are within the Native Woodland Survey. Approximately 1.8 km to the southeast of the boundary of the site, within the National Park Boundary, lies the St Fillans Conservation Area. The closest Scheduled Ancient Monument to the application site within the National Park boundary is Dundurn Fort, on St Fillan's Hill which lies approximately 3.9 km south of the application site.

3.8. The closest long distance walking routes in the National Park to the turbines include:

- The Rob Roy Way which is located approximately 6km to the east connects Callander to Killin via Strathyre and Glen Ogle. This route doubles up as the National Cycle Route 7

- Core Path S1042 which follows the former railway line on the north side of the A85 on the north side of Loch Earn. This path has been recently upgraded to form a new off-road cycle route connecting Lochearnhead to St Fillans (the LERP project).

4. Planning History

4.1. The application site is within the Perth and Kinross Council area, so the National Park Authority holds no records of relevant planning history for the site.

4.2. In terms of neighbouring sites, an application for another windfarm at Glen Lednock, on land adjacent to the east, has been submitted to the ECU on 11 June 2025. This proposal is for up to 19 wind turbines, of which up to 16 are 200m to blade tip and up to 3 are 180m to tip, and associated infrastructure. The application seeks consent for an operational period of 40 years.

4.3. The EIA Scoping Request that was submitted back in November 2023 for the proposed Glen Lednock windfarm (reference ECU00004966) was in respect of a proposal for up to 25 wind turbines with a tip height of 220m for a 40-year period. The subsequent application has reduced the number of turbines by 6 and has reduced the maximum blade tip height by 20m.

4.4. The National Park Authority is a consultee on the Glen Lednock windfarm application and the response to this application will be considered in due course.

4.5. The cumulative impact of the Glentarken windfarm proposal and the application proposal for Glen Lednock is considered in the Planning Assessment.

5. Description of Proposals

The Proposed Development

5.1. The site extends to 1,103 hectares and the main components of the proposed development include:

- 12 no. Wind Turbine Generators (WTGs) across a 4km distance east to west with up to 180m ground to blade tip with internal transformers and a total output of more than 50MW.
- Hardstanding areas at the base of each turbine which includes areas of cut and fill and foundations with a total permanent land use 7442 m2.
- Crane hard standings and associated laydown areas with a total permanent area of approximately 34,680 m 2
- A Battery Energy Storage System (BESS) with a capacity up to 50 MW – area approx. 119m x 75m (0.7 hectare)
- New access junction with the A85 within the National Park boundary, east of Lochearnhead. The access would lead to onsite access track up to

15.6km in length comprising up to 11.8km of cut track, 2.8km floated track and 1km upgraded existing track.

- The tracks are proposed to be permanent for the duration of the operation of the wind farm (50 years) and would be constructed at 6m in width with a 0.5m of shoulder and embankment on each side, with widening proposed at the bends, at junctions and the passing places. Except for the stretch of road from the site access junction to the first proposed borrow pit, which would be constructed from imported material, it is proposed that the tracks would be constructed with on-site rock from borrow pits.
- A network of underground cabling to connect each wind turbine to the on-site substation.
- Watercourse crossings where required.
- Telecommunications infrastructure.
- A LiDAR unit to collect meteorological and wind speed date and associated hard stand.
- Ancillary development such as internal transformers and related switchgear at each turbine.

5.2. Figure 3 shows the proposed windfarm site with the boundary in red, borrow pits hatched brown, construction compound highlighted pink, compound and welfare unit in yellow alongside indicative tracks and turbine locations.

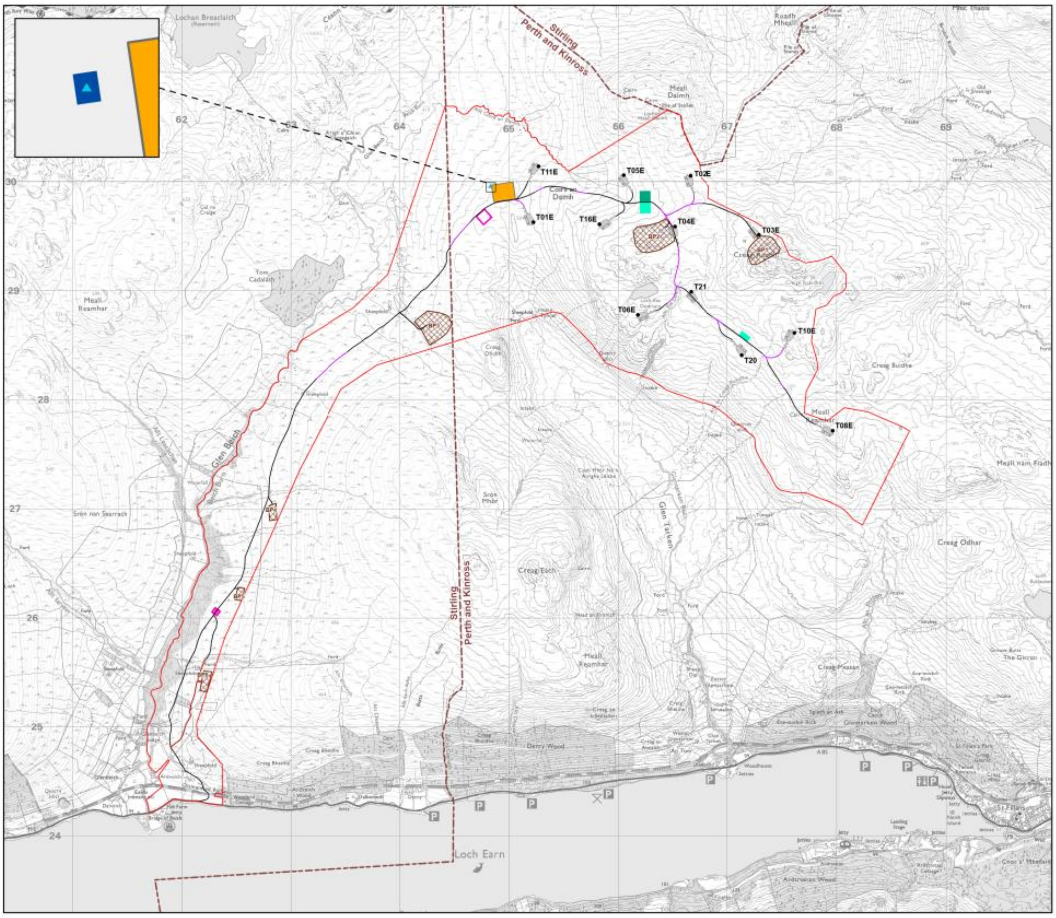


Figure 3 Site Plan (see full version at Appendix 1)

5.3. The application includes coordinates of the proposed WTGs however the location of these and other infrastructure including the on-site access track may be subject to micro siting up to 50m in any direction. Perth and Kinross Council and ECU would agree on the final colour, normally matt white, off white or light grey. Four of the proposed 12 turbines would require visible (red) aviation lighting.

5.4. In addition to the permanent components listed above, the construction phase would comprise the following temporary facilities:

- Site compound areas, (60 x 100 m compound, building 11.5m high) including welfare facilities, site cabins, storage and parking,
- Batching Plant facilities for temporary on-site concrete batching,
- Up to six borrow pits to create access tracks and hard standing; and
- Any other ancillary works required.

5.5. The connection to the National Grid is anticipated as comprising a combination of Overhead Line (OHL) and underground cable via Killin Substation, located within the National Park approximately 9 km from the Site. The exact route of the connection and the detailed technological solution have not yet been determined. As such, the grid connection is not included within the application and will be a subject for future consideration under S37 of the Electricity Act 1989.

5.6. Access to Site would be taken from a newly constructed junction on the north side of the A85, positioned approximately 500m east of the Beich Burn at Ardvetch around 2.5km east of Lochearnhead (Figure 4 and Figure 5). There will be some localised vegetation loss to provide the access and splays. The track is proposed to be 6m wide and would pass through the field, and over the former railway embankment - now the Lochearnhead to Comrie cycle path (Core Path S1042).

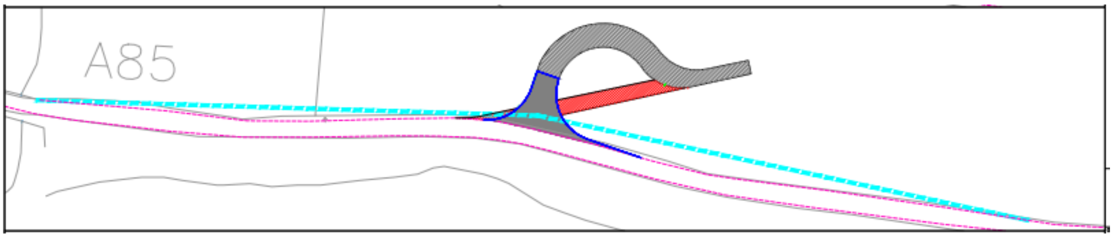


Figure 4 Proposed access junction and visibility sightlines

Figure 5 Approximate location of proposed access

5.7. The Transport Assessment (Technical Appendix 11.1) states a Path Planning Study will be conducted post-consent which will be used to formulate a set of measures into a Recreation and Outdoor Access Plan (ROAP) if required. Users of the Core Paths / paths will be separated from construction traffic through the use of barriers and crossing points will be provided where required, with path users having right of way and temporary diversions and road signage will be provided where necessary.

Economic and Community Benefits

Economic Factors

5.8. The applicant estimates that during the development and construction phase the proposed development will generate up to:

- £13.6m Gross Value Added (GVA) and 156 years of employment in Perth and Kinross and Stirling; and
- £48.3m GVA and 564 years of employment in Scotland.

5.9. During each year of the operational phase, it is estimated that the proposed development could generate up to:

- -£1.3m GVA and 9 Jobs in Perth and Kinross and Stirling; and
- -£3.1m GVA and 25 jobs in Scotland.

5.10. It is also estimated that the proposed development would pay £892,000 each year to the local authorities in non-domestic rates.

Community Benefits

5.11. A voluntary community investment fund is proposed to be established which would contribute £5,000 per Mega Watt (MW) index linked to CPI. Based upon a total installed capacity of around 74.4 MW (12 x 6.2 MW wind turbines), this would equate to up to £372,000 annually to the local community, or £18.6 million during the proposed 50-year operational lifetime. The funding would be made available once main construction starts and will remain in place for the operational life of the project. In addition, the Applicant states that they are committed to open discussions about community ownership of the proposed development, should there be interest in pursuing it. This benefit is voluntary and would not be secured within the planning process and it cannot therefore be a material consideration.

6. Summary of Relevant Supporting Information

Environmental Impact Assessment

6.1. The application is accompanied by an Environmental Impact Assessment (EIA) Report prepared by the applicant and submitted to the Energy Consents Unit.

6.2. The EIA Report includes a Landscape and Visual Impact Assessment (LVIA). An LVIA identifies and assesses the likely significant effects of change resulting from development both on the landscape as an environmental resource in its own right and on people's views and visual amenity in this case, within a 20km radius of the site. The LVIA sets out the potential landscape and visual impacts arising from the proposed windfarm and it also sets out an analysis of the visual impact of the proposed development in relation to the viewpoints and routes which were agreed on at Scoping. This presents an indication of the potential impact of the windfarm on visitor experience and residential amenity.

6.3. The LVIA includes figures showing the Zone of Theoretical Visibility (ZTV) (attached in Appendix 1 and 2). These shows the extent of theoretical visibility of the wind turbines and take 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 ZTVs along with the applicant's assessment are reviewed (in Section 8 of this Report) as part of the National Park Authority's assessment on the impact of this proposal on the National Park.

6.5. The Environmental Impact Assessment Report and associated documents can be viewed online via the Energy Consents Unit portal by entering the planning reference ECU00004700 at https://www.enegyconsents.scot.

7. Policy Context

Determining Authority

Role of Scottish Government's Energy Consents Unit

7.1. The proposed development will generate energy exceeding 50MW and therefore the application will be determined by the Energy Consents Unit (ECU) (on behalf of Scottish Ministers) in accordance with the National Planning Framework 4, the Perth and Kinross Local Development Plan and Stirling Council Local Development Plan and supporting documents.

7.2. The National Park Authority has been consulted as a neighbouring Planning Authority, the proposed access to the development is within the National Park boundary. 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.

Role of NatureScot

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. However, there may be issues on which both organisations will provide advice and the "agreement on roles in advisory casework" notes that there will be occasions when 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.

7.4. Landscape comments were provided to the National Park by NatureScot and the predicted impacts on the Special Landscape Qualities have been discussed and agreed with them. While NatureScot have provided their separate advice to the Energy Consents Unit on the broader implications of the proposal, their advice as provided to the National Park, is that several of the Special Landscape Qualities (SLQ's) of the National Park would be significantly adversely affected by the proposal and the objective of the designation and overall integrity of the National Park would be compromised. The location, size and scale of the proposed development represents a step change in the existing pattern of wind farm development close to the National Park. This area is currently devoid of wind farm development with the closest operational wind farms, Braes of Doune with a turbine height of 100m over 15km away to the south and Strathallan with a turbine height of 93m northeast at 17kms. The proposed development would significantly affect five SLQs of the National Park.

7.5. The hills and ridges north of Glentarken provide a layered upland composition with a strong visual relationship with other nationally designated landscapes and other notable points within the wider landscape. The National Park agree with NatureScot that whilst the turbine height and number could be reduced through re-design or removal of turbines, it is considered unlikely that significant effects identified could be reduced, accounting for the sites' location north of Glentarken which is intervisible between key slopes, summits and ridges within the Breadalbane area of the National Park.

7.6. Due to the significance of this proposal in terms of the impacts as described and assessed, the National Park Authority will submit its own response to the Energy Consents Unit, however as above, officers have ensured that the advice provided to Members, regarding landscape impact, is complementary to that of NatureScot.

7.7. The National Park Authority officers have liaised with NatureScot and agree with their assessment regarding the effects on the SLQ's.

7.8. The Special Landscape Qualities have 8 overview qualities that apply throughout the entire National Park. This is followed by four sub-areas with the relevant area affected by Glentarken windfarm being Breadalbane.

7.9. NatureScot and the National Park Authority consider that in total five Special Landscape Qualities are likely to result in significant effects. As two of the landscape qualities provide a similar description *wild and rugged highlands contrasting with pastoral lowlands* on a Park-wide basis and also the sub area Breadalbane, *steep mountains and long glens*, in line with the newly updated guidance on assessing SLQ's they are assessed and considered together.

7.10. 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 Planning Policy

National Planning Framework 4 (NPF4)

7.11. 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.

7.12. 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.

7.13. 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).

7.14. 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.

7.15. 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.

7.16. 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.

<u>National Parks (Scotland) Act 2000</u>

7.17. 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.

7.18. 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.

7.19. 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

<u>National Park Partnership Plan (2024-2029)</u>

7.20. The National Park Partnership Plan (NPPP) is the overarching vision to guide how all those with a role in looking after the National Park will work together to ensure a successful, sustainable future. By 2045 the NPPP aims to deliver nine outcomes by focussing on 31 objectives from 2024-2029 which are listed under three themes: Restoring Nature, Creating a Low Carbon Place and Designing a Greener Way of Living.

<u>Loch Lomond and the Trossachs National Park Local Development Plan (2017-2021) (LDP)</u>

7.21. 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 principal 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'.

7.22. 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

7.23. 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.

7.24. This further emphasises the need for proposals out with the National Park to consider the visibility of the development from the National Park, and its impact on the setting of the National Park due to visual intrusion and its enjoyment by residents and visitors.

7.25. 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, with the exception of the existing access from the A85 as far as the former railway, lies out with 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 therefore also to be taken into account.

Landscape Considerations

8.2. Chapter 5 of the EIAR includes the detailed landscape assessment of the proposal which considers the effect of the proposed development on the Special Landscape Qualities and Landscape Character Types within the site and the surrounding area.

8.3. The landscape of the site and its immediate context is characterised by the large-scale upland landscapes of northwest Perthshire, contrasting with the glens and strath below these uplands (including Loch Tay and Loch Earn) to the north and south of the site area. These glens and straths have steep sides but allow access into this mountainous area, connecting settlements such as St Fillans, Lochearnhead and Killin each of which are gateway villages into the Loch Lomond and Trossachs National Park. In addition to the settlements there is also a large caravan park on the southern shore of Loch Earn, Ardtrostan, close to St Fillans, around 3.8km from the proposed development turbines. Further from the site, within 10-20km, lie the National Park settlements of Balquidder, Strathyre and Callander. There are no residential properties within 2km from the proposed turbines.

8.4. It is anticipated that the extension of the existing access track along the hillside may have a detrimental visual impact on the eastbound approach (A85) from Lochearnhead and when viewed from south side of Loch Earn as the existing section of track (which will also be widened) is evident at present. Recreational users of Loch Earn and south side Loch Earn will also have visibility of this track and potentially the construction compound and borrow pits proposed beside the access track.

8.5. The LVIA states that proposed access tracks and associated infrastructure will be visible from Ben Vorlich and Meall an t-Seallaidh with views from, Meall na Samhna also discernible. There are no visuals provided of the proposed new tracks including the main track from the A85 which runs lower on the hill side parallel to the west of the existing track.

Special Landscape Qualities

8.6. 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 (SLQs) as the characteristics that, individually or combined, give rise to an area's outstanding scenery. They are qualities that are perceived and experienced by people affecting the sense of place.

8.7. The general SLQ's 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.

8.8. The sub-area of Breadalbane SLQ's are:

- Steep mountains and long glens;
- Crossroads within remote mountain ranges;
- A landscape of distinctive glens and straths;
- The narrow Strathyre and Loch Lubnaig ribbon;
- Beautiful Balquhidder;
- Wide and straight Loch Earn;
- The rocky pass of Glen Ogle;
- Killin and Falls of Dochart
- Expansive Glen Dochart;
- Wild Strathfillan;
- Sinous Glen Falloch.

8.9. The Landscape Visual Impact Assessment (LVIA) submitted within the EIAR identifies that the proposed development will result in significant adverse effects of three of the Special Landscape Qualities of the Loch Lomond and Trossachs National Park. These are:

- Wild and rugged highlands contrasting with pastoral lowlands,
- Tranquillity and
- Steep mountains and glens.

8.10. Due to the introduction of the man-made elements, into an upland area devoid of development, the proposal has been assessed by NatureScot and the National Park Authority as likely to result in significant and adverse effects or significant effect on the following additional Special Landscape Qualities:

- The easily accessible landscape splendour (general SLQ)
- A landscape of distinctive glens and straths (Breadalbane SLQ)
- Wide and straight Loch Earn (Breadalbane SLQ)

8.11. The Natural Heritage advisor and NatureScot agree with the LVIA assessment that significant adverse effects would be focused on the 'wild and rugged highland' Special Landscape Quality. Both parties also agree however, that the proposal would also affect the contrast between lowland and highland gained from some lower elevations and the transition of the Special Landscape Qualities as experienced when traversing key summits within the National Park ZTV coverage. This also includes lower areas on the southern side of Lochearn where the ZTVs demonstrate that many of the turbine hubs and blades would be seen against the skyline looking northward and encroaching onto Loch Earn below.

Landscape Character and Visual Effects

8.12. The visibility of the proposed development from 6 viewpoints within the National Park boundary is shown within the submitted photomontages (see Figures at Appendix 3). These include:

- Viewpoint 3 – Breadalbane Park, Killin (Figure 11)
- Viewpoint 4 - Carstran, South Lochearn Road (Figure 12)
- Viewpoint 7 - Ben Vorlich (Figure 13)
- Viewpoint 9 - Meall na Samhna (Figure 14)
- Viewpoint 15 – Ben More (Figure 15)
- Viewpoint 21 - St Fillans Hill (Figure 16)
- Viewpoint 22- Meall an t-Seallaidh (Figure 17)

8.13. Further wireline-only visualisations are submitted from the following viewpoints within the National Park boundary (see Figures at Appendix 3):

- Caravan Park at Ardrostan (Viewpoint D) - 3.8km to nearest proposed wind turbine (Figure 18).
- Ben Lomond - 39.1km to nearest proposed wind turbine (Figure 19).
- Ben Lui - 38.7km to nearest proposed turbine (Figure 20).

8.14. The National Park's Natural Heritage Advisor agrees with NatureScot that several of the landscape and visual effects have been underplayed within the submitted LVIA.

8.15. The applicant's LVIA assessment has identified that the significant landscape and visual effects of the proposed development are found only within an area relatively local to the site and surrounding context of the study area. The Natural Heritage Advisor disagrees with this and agrees with NatureScot that the effects from wider areas including key areas of Breadalbane are likely to be significant. This includes from:

- Viewpoint 9 (Figure 14) Meall na Samhna - a high summit 16.3km from the nearest turbine which is part of the northern ridge of hills to Glen Dochart with views along Glen Ogle taking in Ben Vorlich, and
- Viewpoint 22 (Figure 17) Meall an t-Seallaidh - located on the ridge of hills at Glen Kendrum which offers views of Loch Earn and the surrounding hills.

8.16. The submitted photomontages (Appendix 3) illustrate the high sensitivity to change of the views to recreational users of these hills. Several of the viewpoint photomontages are hazy which can underplay the visibility of the turbines in the longer-range views.

<u>Landscape Character Assessment</u>

8.17. Landscape Character Type (LCT) defines what is unique about an area. This takes into account existing landforms, elevated field patterns, tree cover, and settlements. Each potential impact on landscape character must be taken into consideration to assess the magnitude of change that could occur. The physical Landscape Character underpins the perceptual Special Landscape Qualities.

8.18. The Glentarken windfarm would introduce a dominant man-made element in close proximity to the designated National Park boundary. Located within the Summits and Plateaux-Tayside landscape character type, this backdrops Loch Earn and the proposal would be evident from Meall na samha - Viewpoint 9 (Figure 14), Meall an t-Seallaidh - Viewpoint 22 (Figure 17), and south of Lochearn, notably Ardrostan caravan park - Viewpoint D (Figure 18).

Significance of Effects

8.19. The significance of effects on the landscape and the visual resource is assessed by considering the sensitivity of the landscape and susceptibility of visual receptors to change as well as the magnitude of change that will take place because of development. Potential impacts can be assessed as Negligible, Minor, Moderate -Minor, Moderate, Major-Moderate and Major and either significant or not significant.

8.20. On review of the submitted LVIA information, the National Park Authority's Natural Heritage Advisor disagrees with the findings of the LVIA, as it is considered that the applicant's assessment of magnitude of change has been underplayed.

8.21. The table below compares the applicant's LVIA assessment of significance with the National Park Natural Heritage Advisor's assessment for 3 of the viewpoints located within the National Park boundary.

Viewpoint	Nearest proposed turbine	Significance of effect (applicant's LVIA)	Significance of effect (National Park Authority)
7 - Ben Vorlich	10.1 km	Major-moderate significant	Major - significant
9 - Meall na Sambha	16.3km	Moderate not significant	Moderate - significant
22 - Meall an t-Seallaidh	12.7km	Moderate not significant	Moderate - significant

8.22. Additionally, as evidenced in the view points from key summits including Ben Vorlich (Figure 13) and eastward looking views from summits including Meall an Seallaidh (Figure 17) and Meall Samhna (Figure 14) the proposal would introduce a large scale vertical man-made focal point into an area of undeveloped upland devoid of windfarm development.

Night time visibility

8.23. The LVIA concludes (Technical Assessment of Visible Aviation Lighting – appendix 5.2) that there will be significant effects from the visible aviation lighting from Ben Vorlich - Viewpoint 7 (Figure 13) advising that this is for a short period of time experienced during the evening and early morning hours of darkness, around dusk and sunrise. Given that the remote hills, mountains and footpaths are visited infrequently at night time the assessment concludes that the number of receptors affected by the lighting will therefore be low.

8.24. However, NatureScot and the National Park landscape advice is that significant daytime effects on the noted Special Landscape Qualities would extend into significant adverse nighttime effects as there would be the introduction of nighttime lighting into an open upland area presently devoid of this type of lighting.

<u>Cumulative Impact</u>

8.25. Adjacent to the site lies the proposed Glen Lednock Windfarm, an application for which was received by the ECU on 11 June 2025 (ECU00004966). Glen Lednock would be located east of the site in the neighbouring landscape characteristic terrain, across a similar part of the broad upland plateau at as the site area.

8.26. Figure 6 shows the appliction site bound in red and the Glen Lednock windfarm (as previously proposed at the earlier EIA scoping stage) in yellow. Operational windfarms are shown as black and consented windfarms are shown in green. The Figures at Appendix 4 shows the revised Glen Lednock windfarm proposal (reduced from 25 to 19 turbines) in culmination with the Glentarken windfarm.

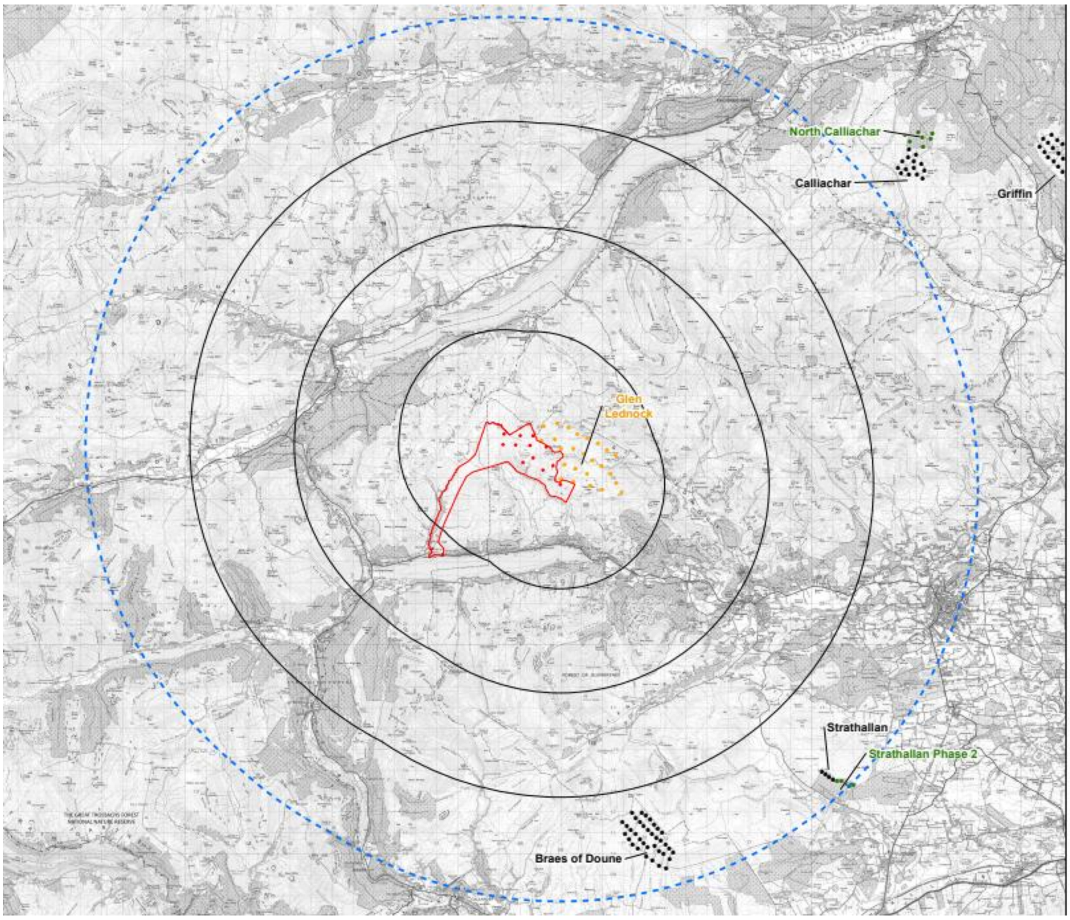


Figure 6 Cumulative windfarms within a 20km radius (blue ring) from the site shown below – Figure 5.15 from the EIAR.

8.27. If both wind farms were to be implemented, then this would result in a combined 31 wind turbines ranging between 180m and 200m in height which would result in significant adverse effect on the Special Landscape Qualities of the National Park. Cumulatively, the two schemes would be read as one and there would be a significant magnitude of change to the Special Landscape Qualities of the National Park and a significant magnitude of change to the existing landscape character viewed from several iconic viewpoints.

Summary of Landscape Impacts

8.28. The Zone of Theoretical Visibility (ZTV) analysis presented within the LVIA shows widespread theoretical visibility of the proposed development within 20km across the north and eastern area of the National Park and the Comrie to St Fillans National Scenic Area (NSA).

8.29. There would be a step change to the Landscape Character Type of 'Summits and Plateaux – Tayside' with turbines evident from several areas along South Lochearn Road. There would be visibility of the turbines at the southeastern edge of the Loch, by recreational users of Loch Earn itself, and from the popular hill tracks to the slopes and peak of Ben Vorlich.

8.30. There would be visibility from slopes and peaks of Breadalbane (including from Ben Vorlich, Meall an t-Seallaich and Meall na Samha) and these effects are considered to be significant and adverse on the Special Landscape Quality 'wild and rugged highlands contrasting with pastoral lowlands', 'tranquillity' and 'steep mountains and long glens'.

8.31. The visibility of the turbines from Meall an t-Seallaidh and Meall na Samha looking east to the proposal would introduce a large scale vertical man-made focal point into an area of undeveloped upland presently devoid of wind farm development. There would also be visibility from lower elevations including Viewpoint D: caravan park at Ardtrostan and recreational uses of Loch Earn (Figure 18).

8.32. The proposal would result in a step change in both the proximity of wind turbines to the National Park boundary and the scale of the wind turbines proposed at 180m in height.

<u>Summary of Effects</u>

8.33. The National Park Authority agree with NatureScot's assessment that:

- Six SLQ's would be likely to experience adverse effects resulting from the introduction of the Proposed Development affecting the contrast between lowland and highland.
- There would be a step change on landscape character with the introduction of a large-scale windfarm into an open upland area intervisible from popular slopes, summits and ridges.
- Views from Ben Vorlich, Meall an t-Seallaich and Meall na Samha would see the introduction of a large scale vertical man-made focal point into an area of undeveloped uplands devoid of windfarm development. From lower elevations such as viewpoint D: the caravan park at Ardrostan on the

southern shore of Loch Earn, the Proposal would affect the contrast between lowland and highland.

8.34. Additionally, the newly submitted proposal for a windfarm at Glen Lednock with turbines appearing at a similar altitude and the two schemes would be read as one noticeably increasing the number of turbines visible from Ben Vorlich.

8.35. It is concluded that the proposed development does not meet NPF4 Policy 4 criteria c) due to the extensive nature of the effects on popular summits, slopes and ridges within the Breadalbane area of the National Park. These effects would result from the proposed siting, scale and type of development, with its extensive tracks and associated infrastructure, which could not be overcome within the site parameters.

8.36. The introduction of turbines into an area currently without windfarms, so close to the National Park boundary, would significantly detract from, contrast with and compromise several Special Landscape Qualities and key characteristics that are integral to defining the enjoyment of the north and eastern location of the National Park.

Planning Policy Considerations

Principle of Development

8.37. Unlike planning applications considered under the terms of Section 25 of the Planning Act, the Development Plan does not from the primary basis upon which the application will be determined. The Development Plan will be an important material consideration in the determination of the application, however there is no legislative requirement for the S36 application to be determined in accordance with the provisions of the Development Plan.

8.38. National Planning Framework 4 proposes a step change in national policy on climate and energy and recognises the crucial role that renewable energy developments have to play in a climate crisis. Nevertheless, NPF4 has maintained a moratorium against wind farms within National Parks and National Scenic Areas (Policy 11) and there remains a requirement to consider potential landscape and visual impacts, alongside the benefits resulting from renewable energy generation (Policy 4).

8.39. The National Park Partnership Plan and Local Development Plan are 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.

8.40. Local Development Plan 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.

8.41. National Planning Framework 4 - Policy 4 (Natural Places) part c) 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.

8.42. In terms of part (ii) climate benefits include CO2 emission savings of approximately 5.88 million tonnes and associated positive contribution to the Scottish Government's net zero greenhouse gas emission target by 2045. The proposal would also reduce reliance on imported energy supplies. The potential socio-economic benefits (Chapter 12 of the EIA Volume 1 Main Report) include the creation of a total of 720 'years of employment' and 34 permanent jobs and associated £66.3m GVA generated through the construction phase and over the lifetime of the project (as listed in greater detail Section 5 above). The proposed £372,000 annual fund for the local community (£18.6 million over the lifespan of the development) is voluntary and therefore cannot be a significant material consideration.

8.43. Although the proposed wind farm would be a National Development (as defined by NPF4) and acknowledging the role that renewable energy development must play in a climate crisis, it is assessed that the significant adverse effects on the National Park of this proposal are not clearly outweighed by social, environmental or economic benefits of national importance. The significance of the impacts on the National Park is key in terms of this policy. 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 eastern part of the National Park, including Killin, Lochearnhead, St Fillans and surrounding settlements, are areas where people first enter the National Park and are principal gateways to the National Park and key routes in close proximity to the proposed development include the A85. The proposed windfarm would be the closest sited windfarm to the National Park boundary (with its access taken from within the boundary) and would bring the proximity of windfarm development much closer than any other to date. The introduction of large turbines (180m) into an area so close to the National Park boundary, and where there are currently no windfarms in the vicinity or visible in the backdrop, would significantly detract from and compromise several Special Landscape Qualities and key characteristics that are integral to defining the enjoyment of north and eastern areas of the National Park and popular hills. In this case, as set out above in the landscape assessment, the objectives of designation and the overall integrity of the National Park would be compromised by the proposed development.

8.44. This proposal would also set a landscape precedent for further windfarms in this area including the adjacent Glen Lednock windfarm proposal which, if consented, would cumulatively exacerbate the identified adverse landscape impacts and further undermine the integrity of the National Park designation. Whilst the benefits of the development are acknowledged, they are not deemed of national importance and there is insufficient justification as to why the proposal, and the benefits, could not accrue from siting in a less sensitive location away from the National Park boundary. Given the significant impact upon the Special Landscape Qualities it is concluded that proposed development would be contrary to Renewable Energy Policy 2 of the Local Development Plan and NPF4 Policy 4 part (c).

8.45. NPF4 policy 11 supports the principle of development proposals for all forms of renewable, low-carbon and zero emissions technologies. It 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. However, in this case, the impacts would be widespread across a significant part of the north and east of the National Park and its SLQs and National Scenic Ares (NSA) and would therefore not be localised. It is therefore considered that the proposed development would not comply with NPF4 Policy 11.

8.46. NPF 4 Policy 11-part c states that development proposals will only be supported where they maximise net economic impact, including local and community socio-economic benefits as employment business and supply chain opportunities.

8.47. NPF 4 Policy 11 (e) states that in addition, project design and mitigation will demonstrate how a number of impacts are addressed such as impacts on communities, significant landscape and visual impact, public access etc. The National Park Natural Heritage Advisor and NatureScot agree that there is no level of mitigation which could address the significant adverse impact that would result from the proposal.

8.48. NPF 4 Policy 12 ‘Zero Waste’ supports development which accord with seek to reduce, reuse or recycle materials. The application proposes the decommissioning of the development after 50 years. The methodology for doing this will be the responsibility of Perth and Kinross Council.

Planning Assessment Conclusion

8.49. It is recommended that the National Park Authority object to the proposal for the reasons set out below.

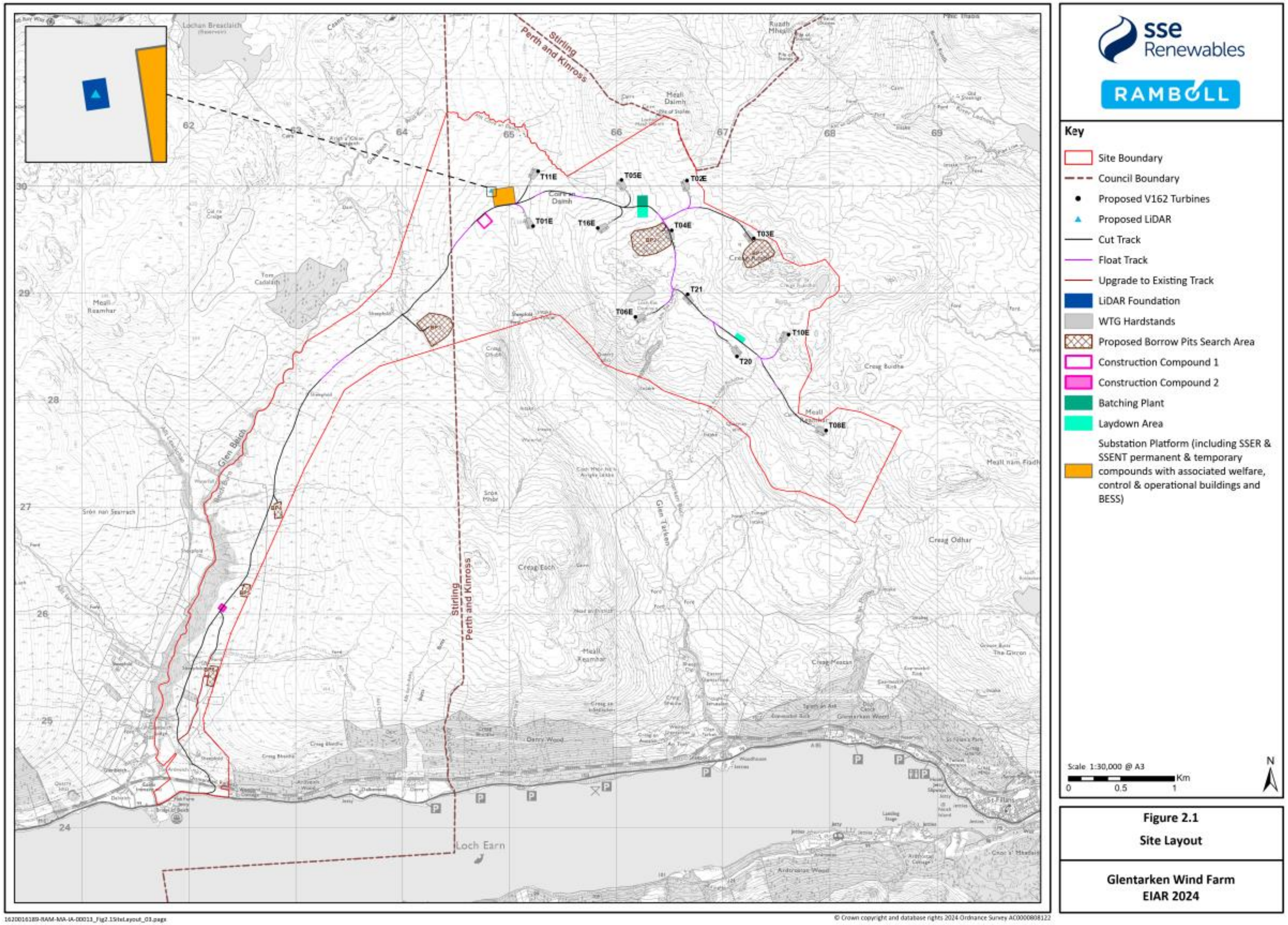
8.50. As a consultee on this application the National Park Authority is mindful of its duty (in the National Parks Act 2000) to conserve and enhance the natural and cultural heritage of the area (the first aim). Whilst the economic benefits are an important material consideration, because there is a conflict with this aim, the National Park Authority must give greater weight to the first aim. Whilst the proposed economic factors and community benefits proposed are noted, it is not considered that these outweigh the significant landscape effects and their impact on the integrity of the National Park designation. The proposal as presented does not provide justification as to why this very large-scale installation could not be located elsewhere, further away from the National Park boundary in a less sensitive location.

8.51. The proposal is contrary to National Planning Framework 4, Policy 4 (Natural Places) in that the proposed site location, so close and prominent to the National Park boundary will compromise the objectives of the designation. The significant adverse effects that the proposal will have upon the Special Landscape Qualities for which the National Park has been designated are not outweighed by social, environmental or economic benefits of national importance.

8.52. The proposed windfarm and associated infrastructure would be very prominent against the backdrop of the Special Landscape Area of Breadalbane introducing a step change to the existing pattern of windfarm development which would be brought much closer to the National Park boundary and introduce turbines in an area and wider landscape to the north east of the National Park which is currently devoid of windfarms.

8.53. The first aim of the National Park Authority is to conserve and enhance the natural and cultural heritage of the area. Whilst the associated economic benefits are an important material consideration, because there is a conflict with this aim, the National Park Authority must give greater weight to the first aim. The proposed development would have a significant adverse impact upon the open views and visual amenity for residents, visitors and recreational users of the National Park and would fail "to conserve and enhance the natural and cultural heritage of the area" contrary to the first aim of the National Park Act. The National Park Authority therefore recommends objection to the proposed windfarm development at Glentarken.

Appendix 1 - Site Plan



Appendix 2 - Zones of Theoretical Visibility (ZTVs)

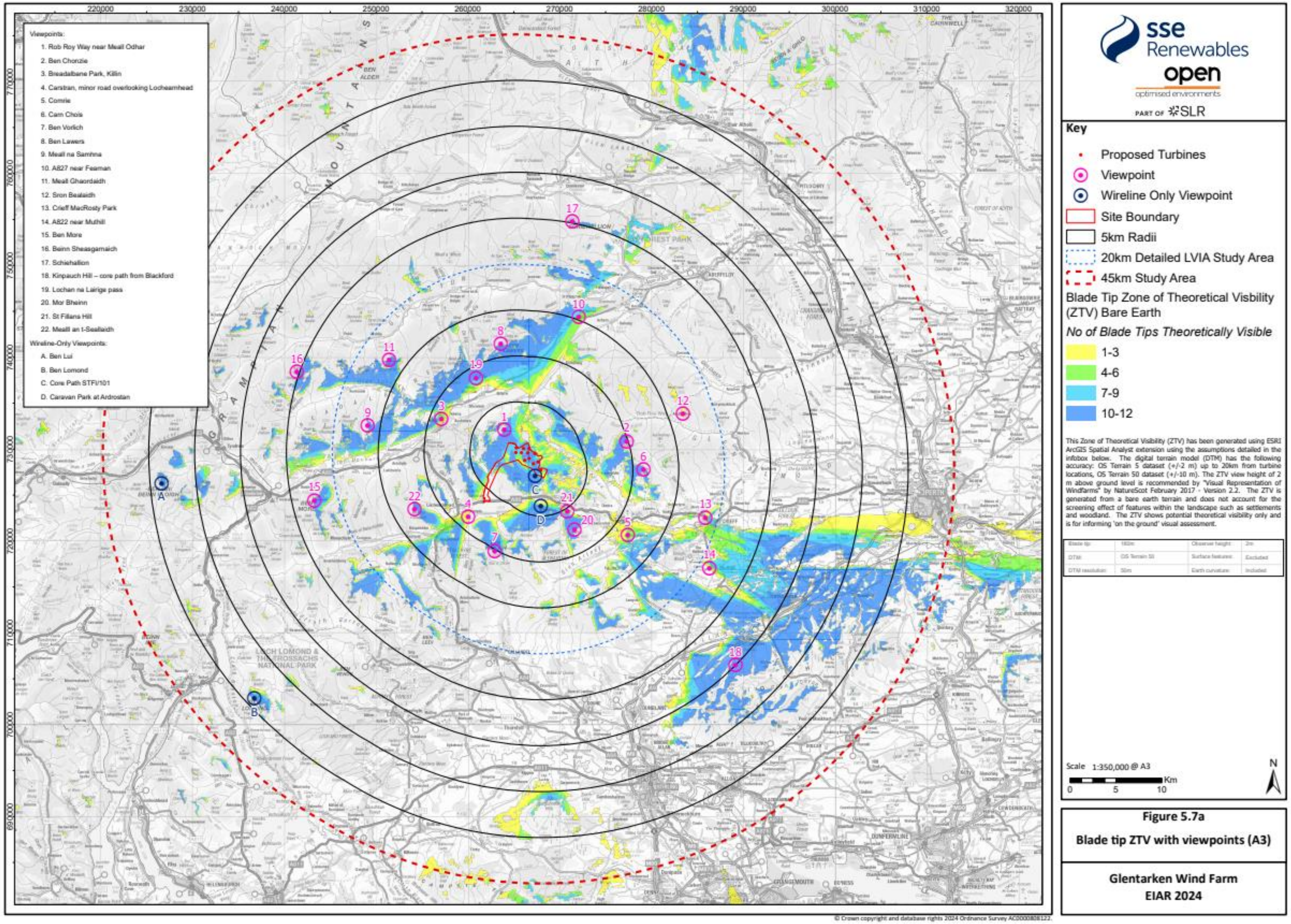


Figure 7 ZTV from the EIAR identifies the number of blade tips from the proposed wind turbines that would be theoretically visible from the identified viewpoints.

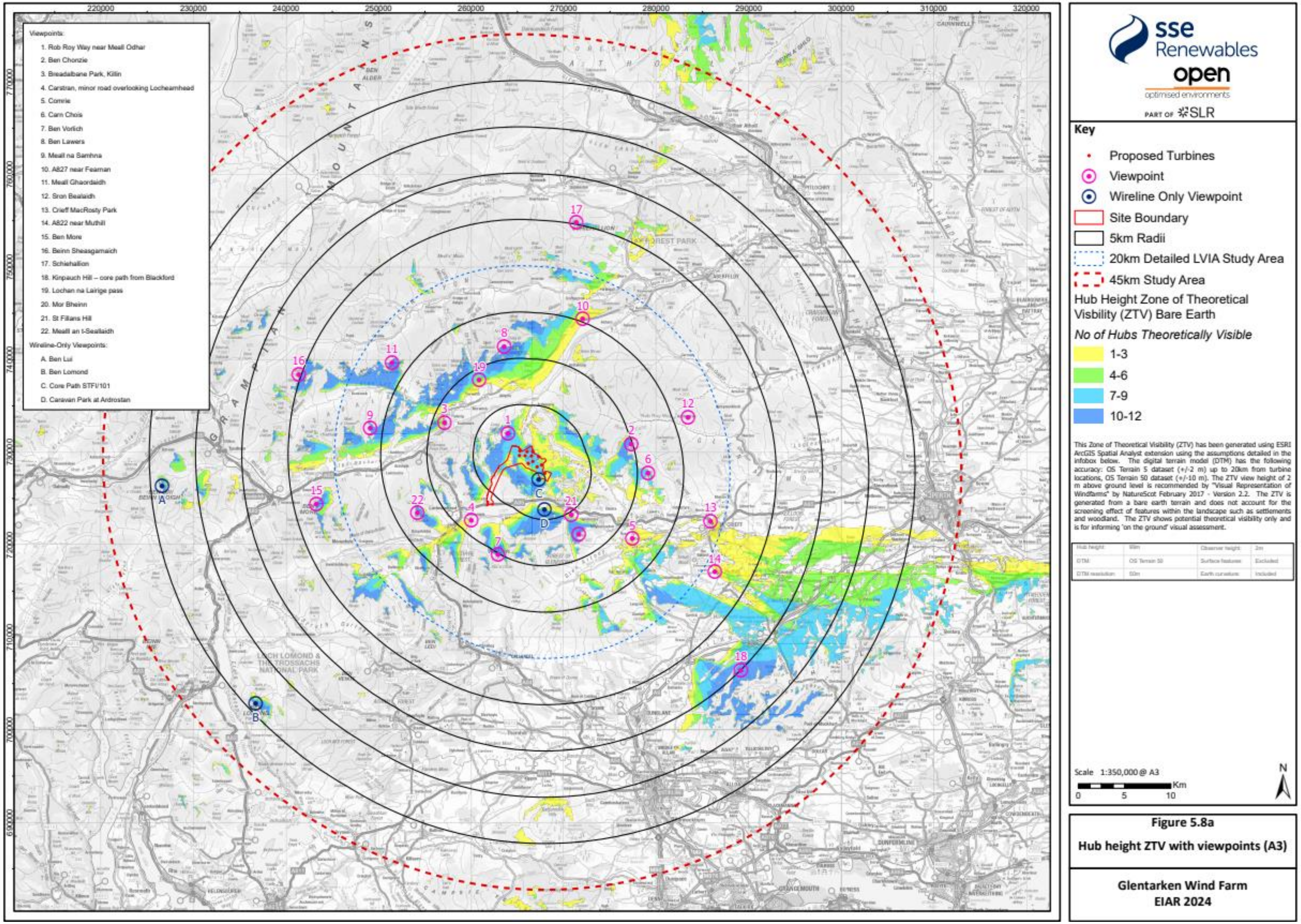


Figure 8 ZTV from the EIAR identifies the number of wind turbines viewed from the hub height upwards from the identified viewpoints

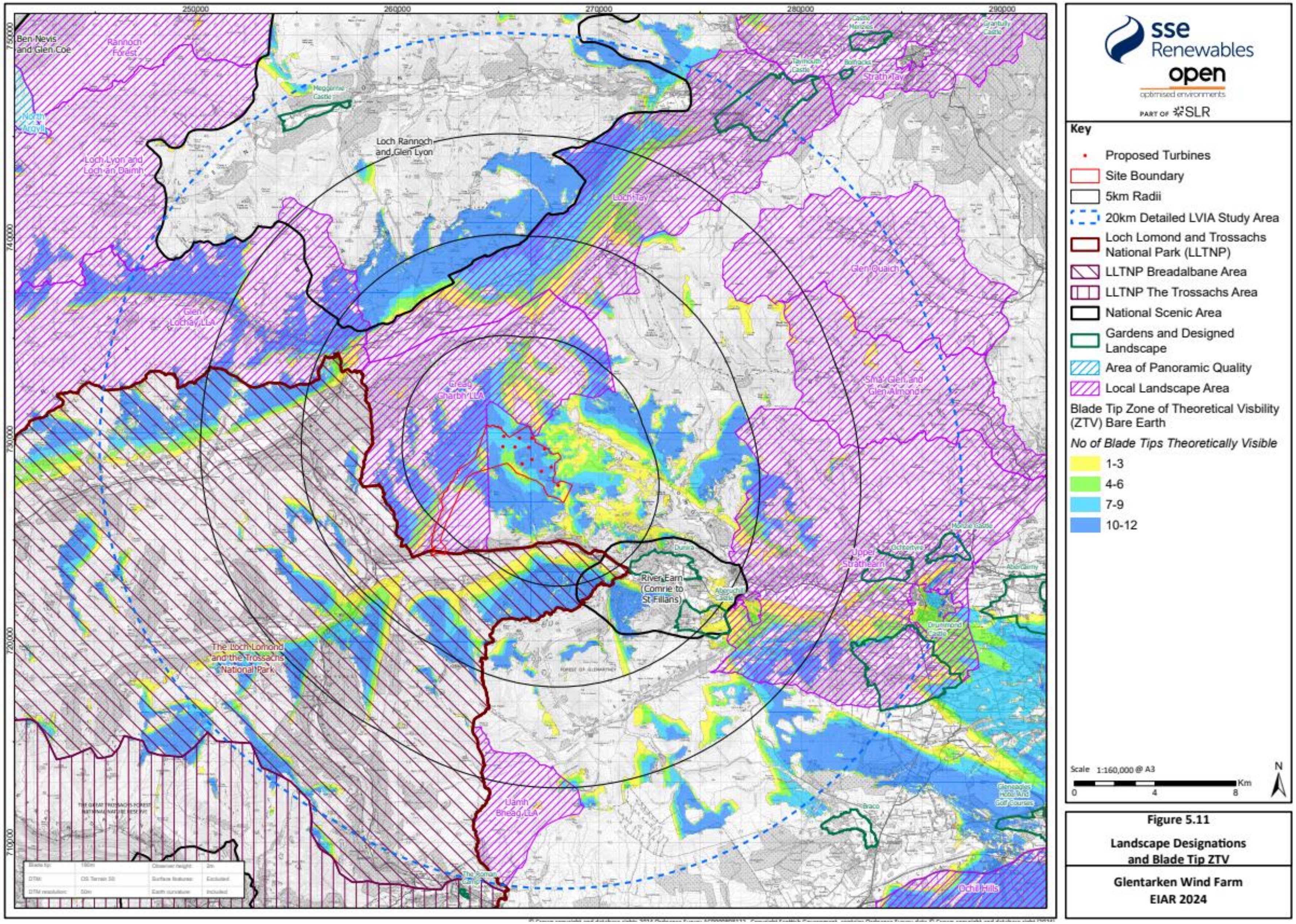


Figure 9 ZTV from the EIAR identifies the number of blade tips from the proposed wind turbines that would be theoretically visible from the surrounding Landscape Designations

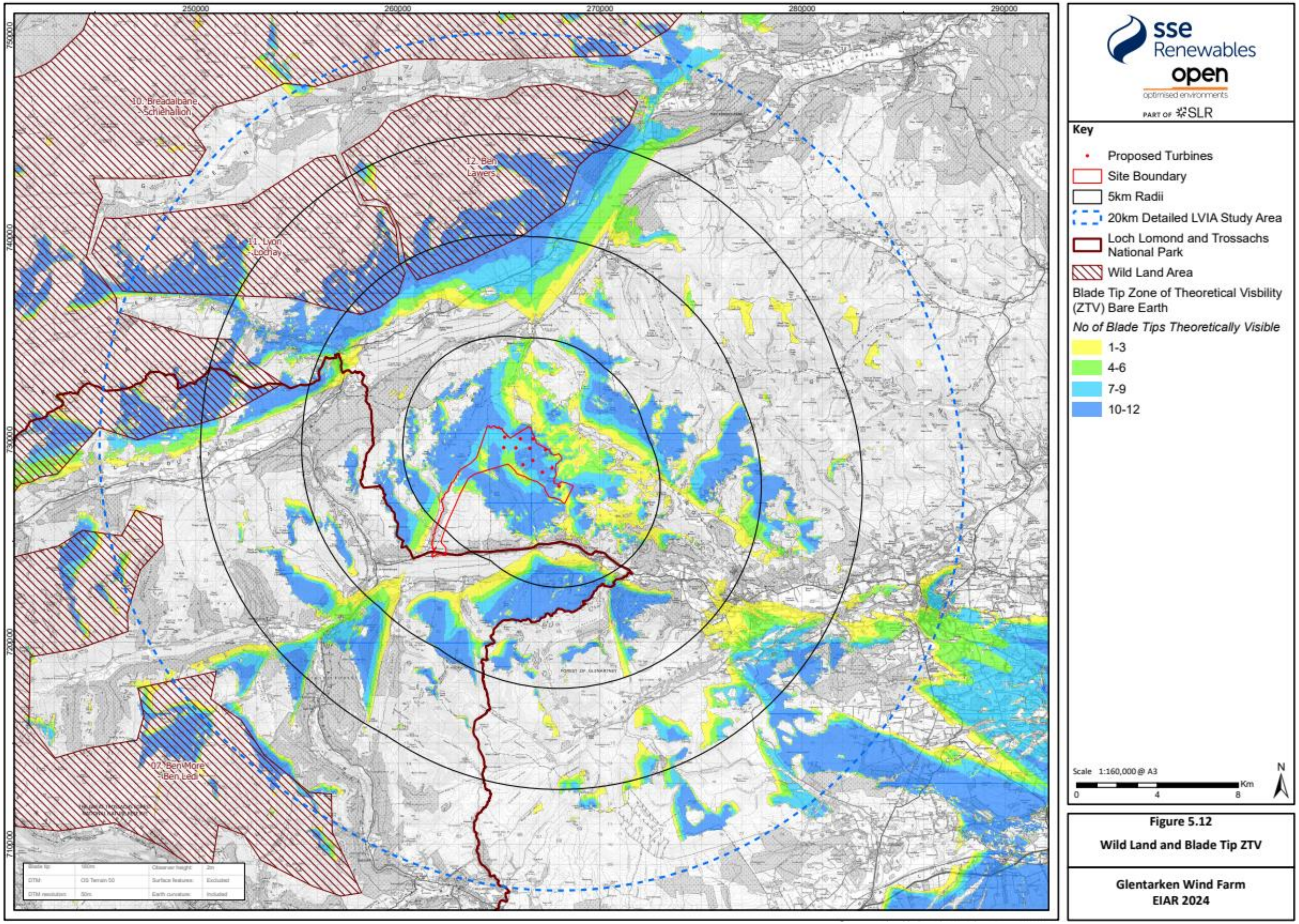


Figure 10 ZTV from the EIAR identifies the number of blade tips from the proposed wind turbines that would be theoretically visible

Appendix 3 - View point photo montages from the EIAR LVIA

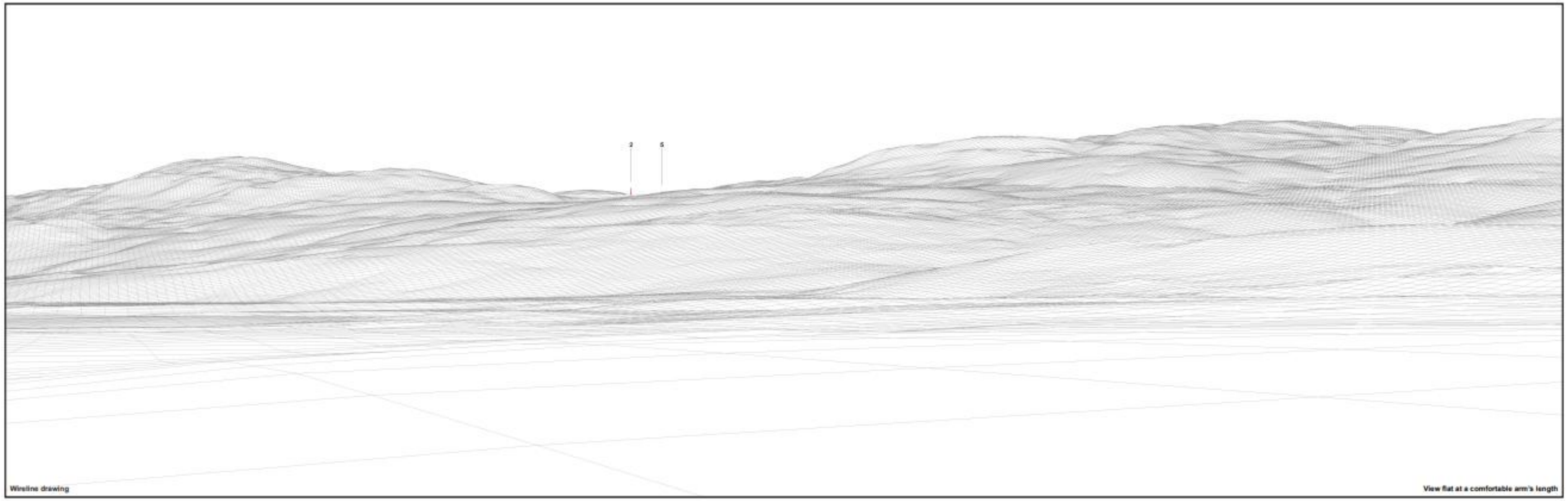


Figure 11 LVIA Figure 5.19 (d) - Viewpoint 3 Breadalbane Park Killin - wireframe below montage to show location

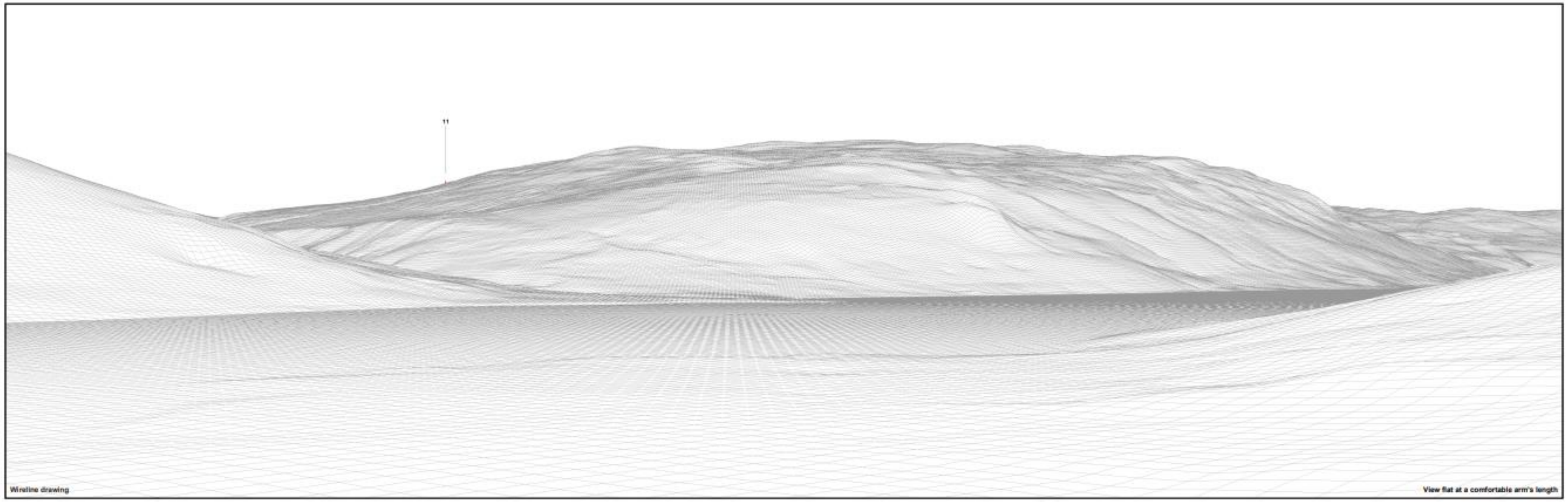


Figure 12 Viewpoint 4 EIAR LVIA - Figure 5.20 - Viewpoint 4 Carstran minor road overlooking Lochearnhead - wireframe below montage to show location

OS reference:	262919 E 718914 N	**Horizontal field of view:**	53.5 (planar projection)	**Camera:**	Canon EOS 6D
Eye level:	984.2 mAOD	**Principal distance:**	812.5 mm	**Lens:**	Canon EF 50mm f/1.4
Direction of view:	21	**Paper size:**	841 x 297 mm (half A1)	**Camera height:**	1.5 m
Nearest turbine:	10.15 km	**Correct printed image size:**	820 x 260 mm	**Date and time:**	16.04.2024 09:48

Figure: 5.23h
Viewpoint 7: Ben Vorlich
Glentarken

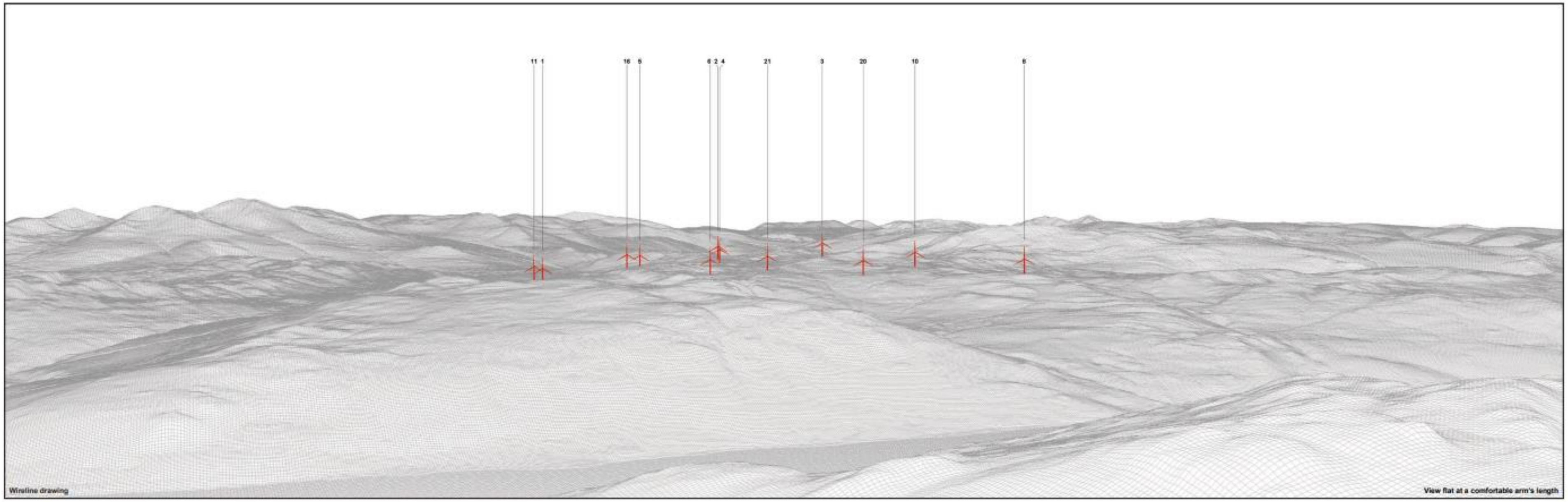


Figure 13 Viewpoint 7 EIAR LVIA Figure 5.23 (h) VP 7 – Ben Vorlich from the summit 984.2m AOD – wireframe below montage to show location

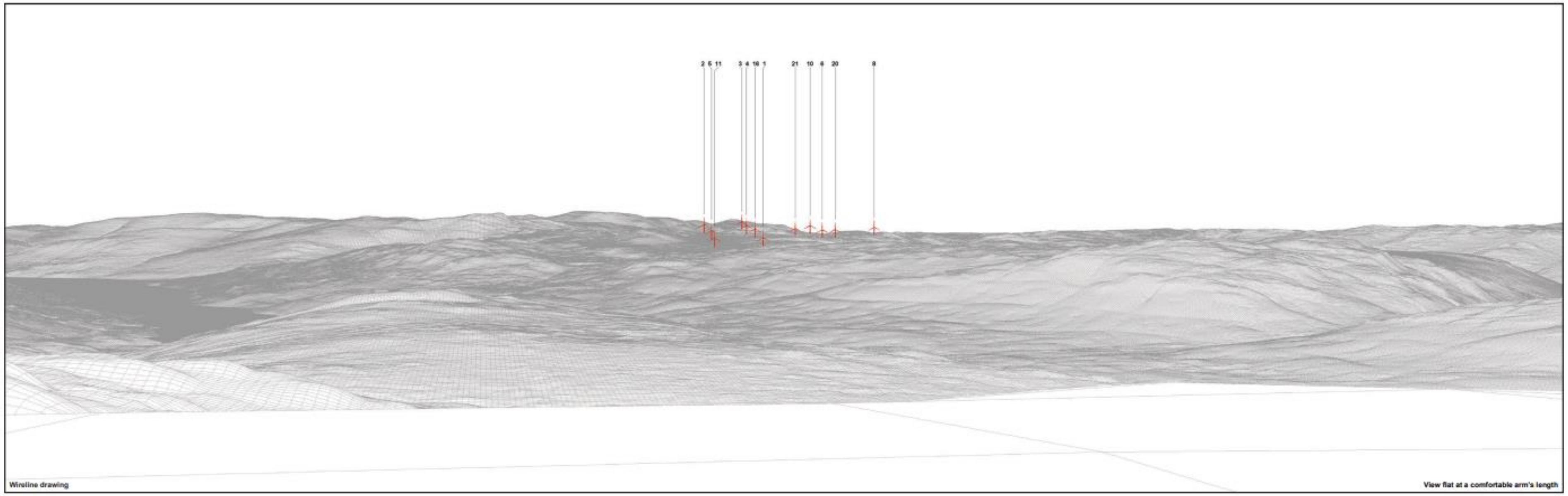


Figure 14 Viewpoint 9 EIAR LVIA Figure 5.25 (f) VP9 – Meall na Samhna from the summit at 849.8m AOD – wireframe below montage to show location

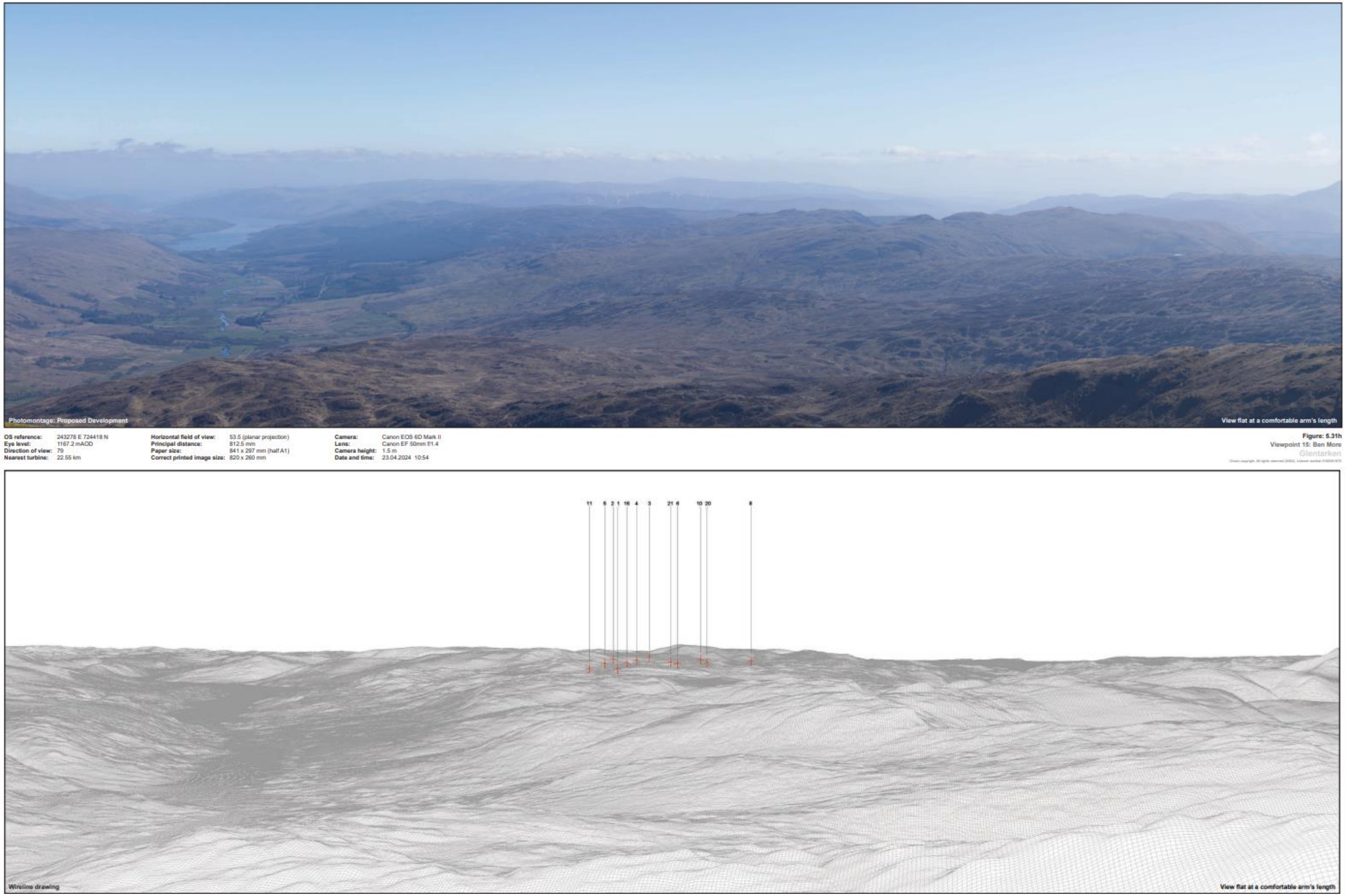


Figure 15 Viewpoint 15 EIAR LVIA Figure 5.31 (h) VP 15 – Ben More from the summit at 1167.2 AOD – wireframe below montage to show location

OS reference: 270826 E 723250 N
Eye level: 177.8 mAOD
Direction of view: 324
Nearest turbine: 5.30 km

Horizontal field of view: 53.5 (planar projection)
Principal distance: 812.5 mm
Paper size: 841 x 297 mm (half A1)
Correct printed image size: 820 x 260 mm

Camera: Canon EOS 6D
Lens: Canon EF 50mm f/1.4
Camera height: 1.5 m
Date and time: 16.04.2024 14:51

Figure: 5.37f
Viewpoint 21: St Fillans Hill
Glentarken

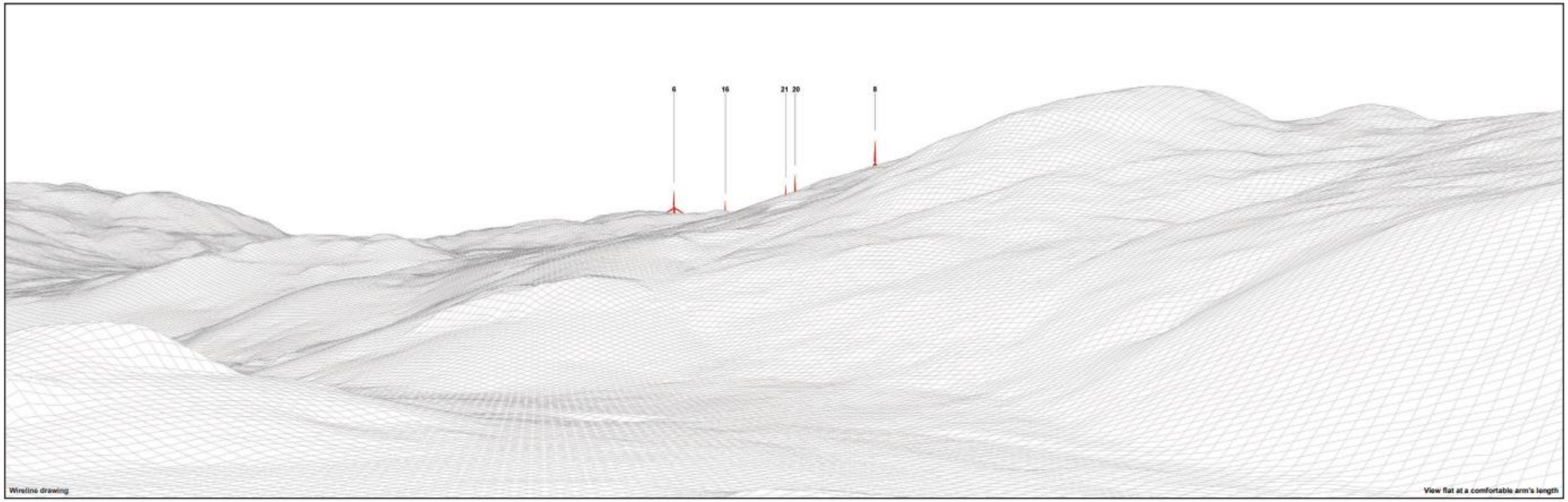


Figure 16 Viewpoint 21 EIAR LVIA Figure 5.37 (f) VP 21 St Fillans Hill from the summit at 324m AOD – wireframe below montage to show location

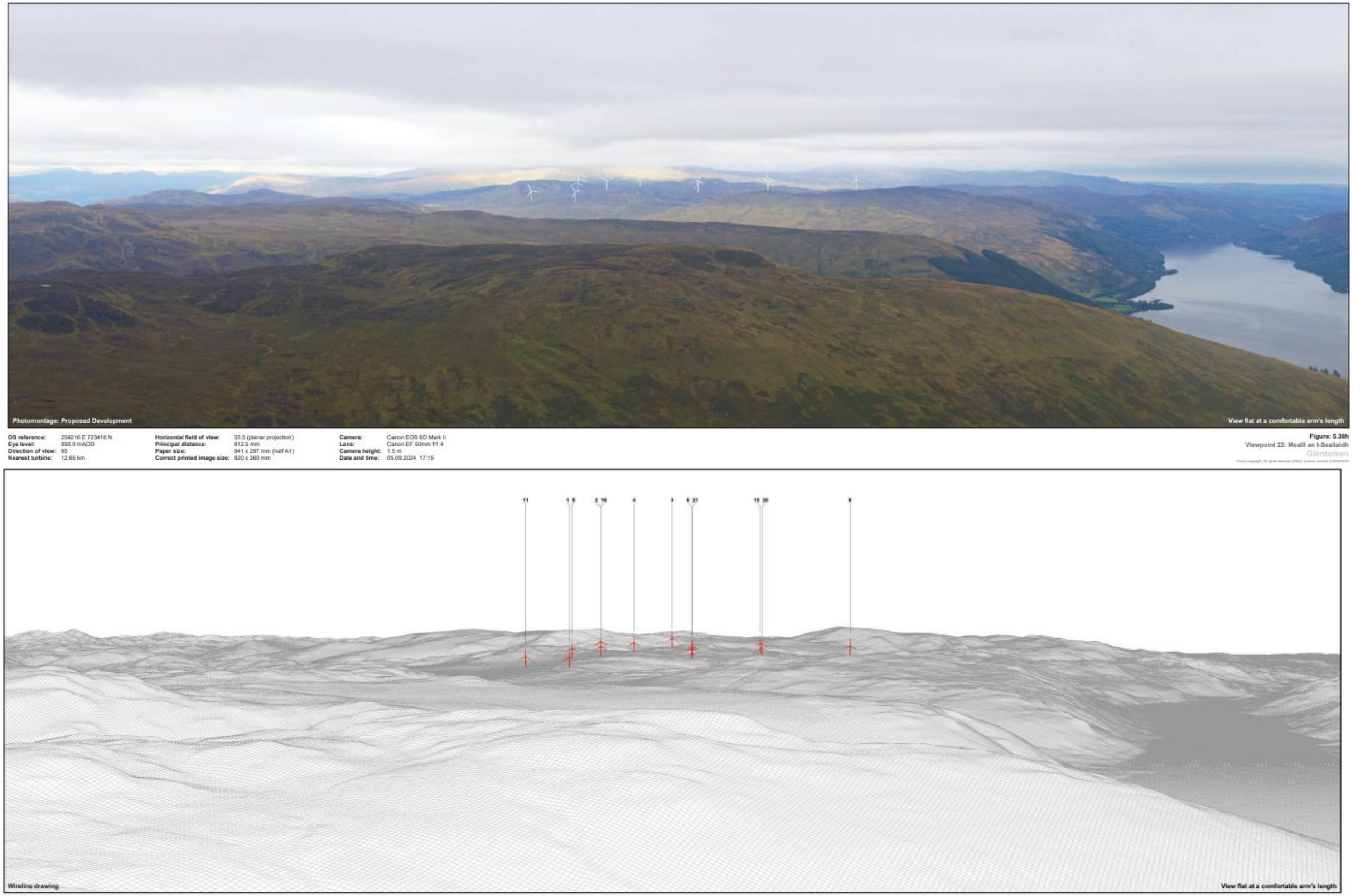


Figure 17 Viewpoint 22 EIAR LVIA Figure 5.36 (h) VP 22 Meall an t-Seallaidh from the summit at 850m AOD – wireframe below montage to show location

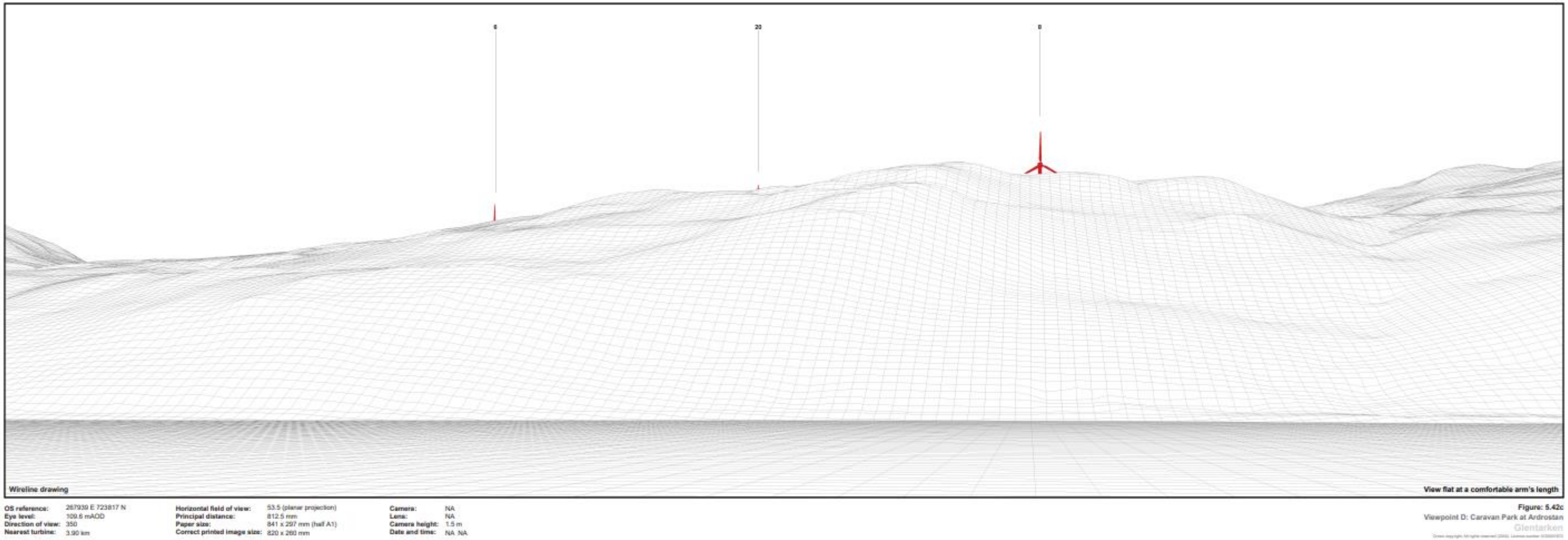


Figure 18 Viewpoint D EIAR LVIA Figure 5.42 - Caravan Park at Ardrostan

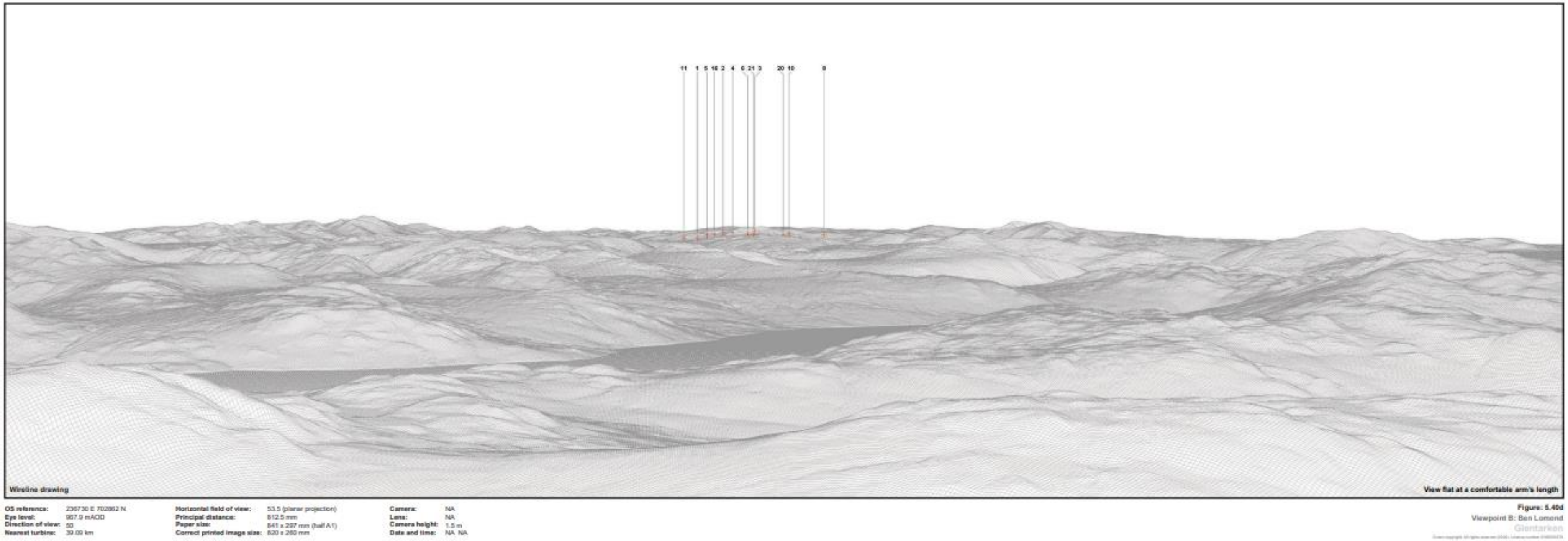


Figure 19 Viewpoint B EIAR LVIA Figure 5.40 - Ben Lomond

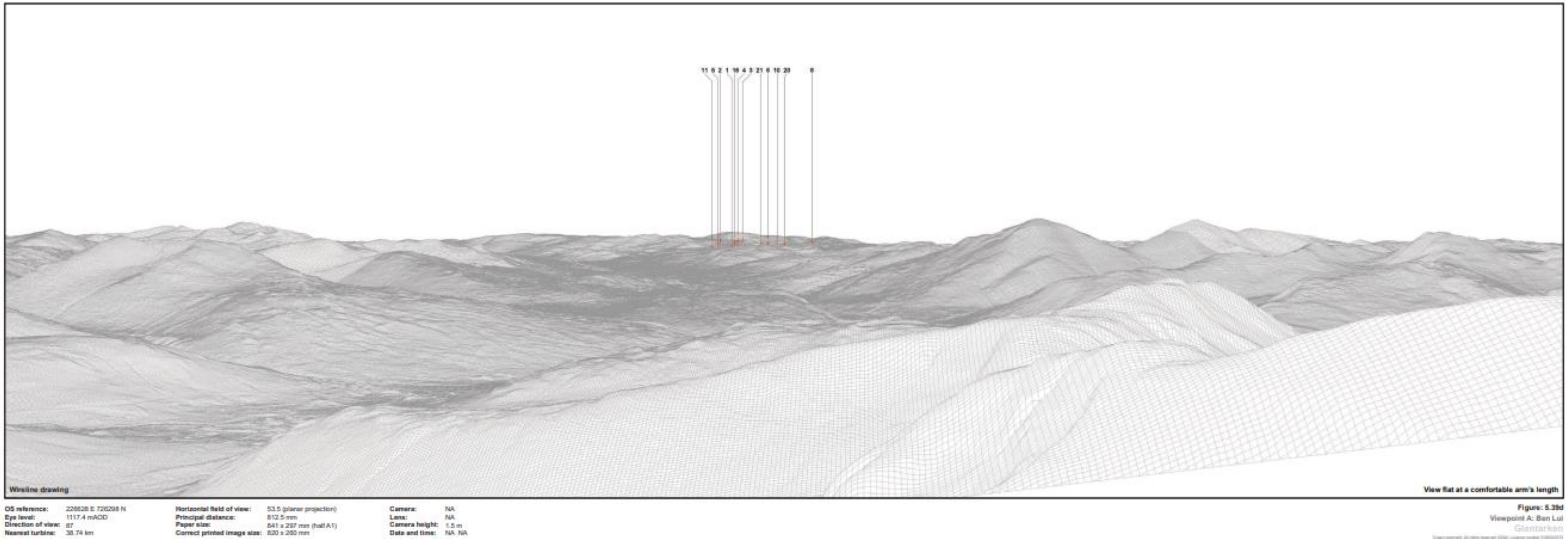


Figure 20 Viewpoint A LVIA Figure 5.39 - Ben Lui

Appendix 4 - Cumulative Impacts with Glen Lednock windfarm

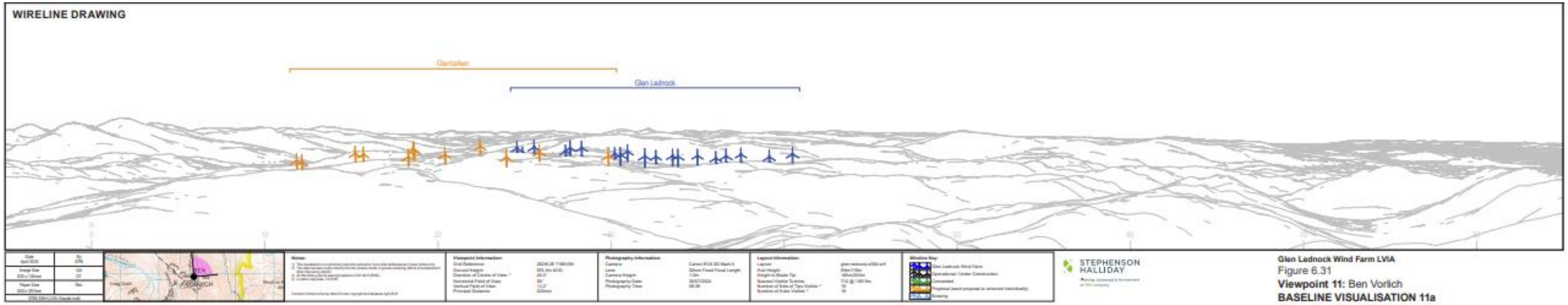


Figure 21 Cumulative Impact with proposed Glen Lednock windfarm – view from Ben Vorlich (Glentarken in yellow, Glen Lednock in blue)

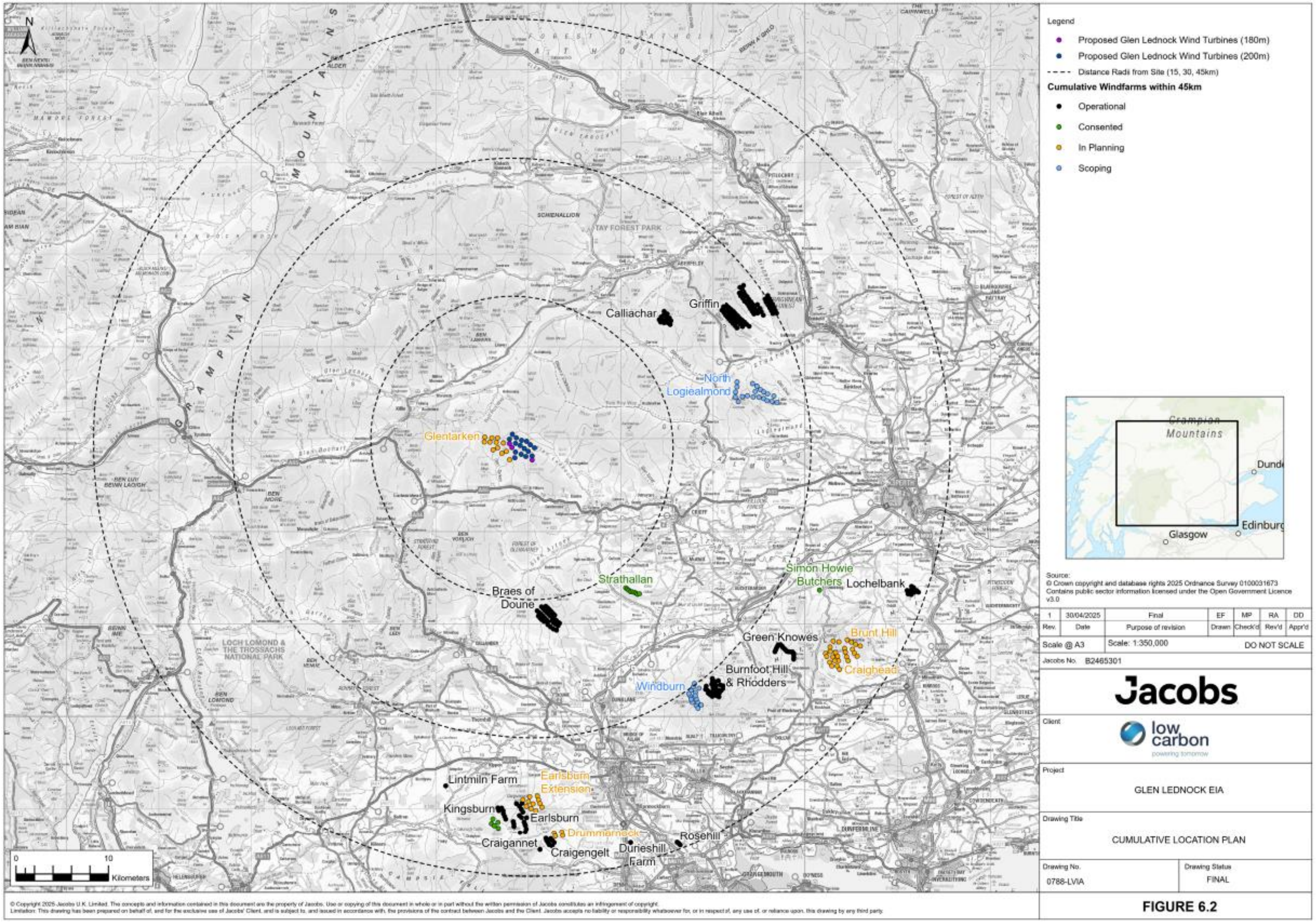


Figure 22 Cumulative Local Plan showing the proposed Glentarken and Glen Lednock windfarms along with other operational and potential windfarms

Appendix 5 - NatureScot Response