Planning and Access Committee

Meeting: 29 September 2025

Agenda item: 4

SUBMITTED BY:	Director of Place

APPLICATION NUMBER:	ECU00004966 (Scottish Government Energy Consents Unit reference) EXT/2025/0008
APPLICANT:	Glen Lednock Wind Farm Ltd
LOCATION:	Glen Lednock Windfarm approximately 8km Northwest of Comrie.
PROPOSAL:	Proposed windfarm comprising of up to 19 wind turbines, of which up to 16 are 200m to tip and up to 3 are 180m to tip, and associated infrastructure
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

Contents

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 for the construction of a windfarm at Glen Lednock. The development would be located within the Perth and Kinross administrative area approximately 3 km from the boundary of the Loch Lomond and Trossachs National Park north of St Fillans.

1.2. The application, which was submitted to the ECU on 21 May 2025, is for the erection and 40-year operation of up to 19 wind turbines with associated access, battery energy storage and ancillary infrastructure. Up to 16 turbines would be up to 200m in height (to blade tip) and up to 3 are proposed to be 180m.

1.3. The proposed development is "Strategic Renewable Energy Generation and Transmission Infrastructure" which is categorised as a National Development in National Planning Framework 4 (NPF4). National Developments are significant developments of national importance that will help deliver the Spatial Strategy.

1.4. 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 ECU rather than by the Planning Authority.

1.5. 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 National Park Authority's views into account.

1.6. The National Park's response to this consultation is being reported for the Planning Committee's consideration because it is proposed to object to the application given the anticipated significant adverse effects of the proposal on the Special Landscape Qualities and the overall integrity of the National Park.

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:

i. 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 and views of windfarms in open upland visible from popular slopes, summits and ridges.

ii. The proposed windfarm and associated infrastructure would result in significant adverse effects on the Special Landscape Qualities of the National Park and of Breadalbane including 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.

iii. 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.

iv. 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 location and description

3.1. The application site is located to the northwest of the National Park within the Invergeldie Estate approximately 2.8 km north of the National Park settlement of St Fillans and approximately 10.3km east of Lochearnhead. Figure 1 identifies the site location in red, and the National Park boundary is highlighted in yellow.

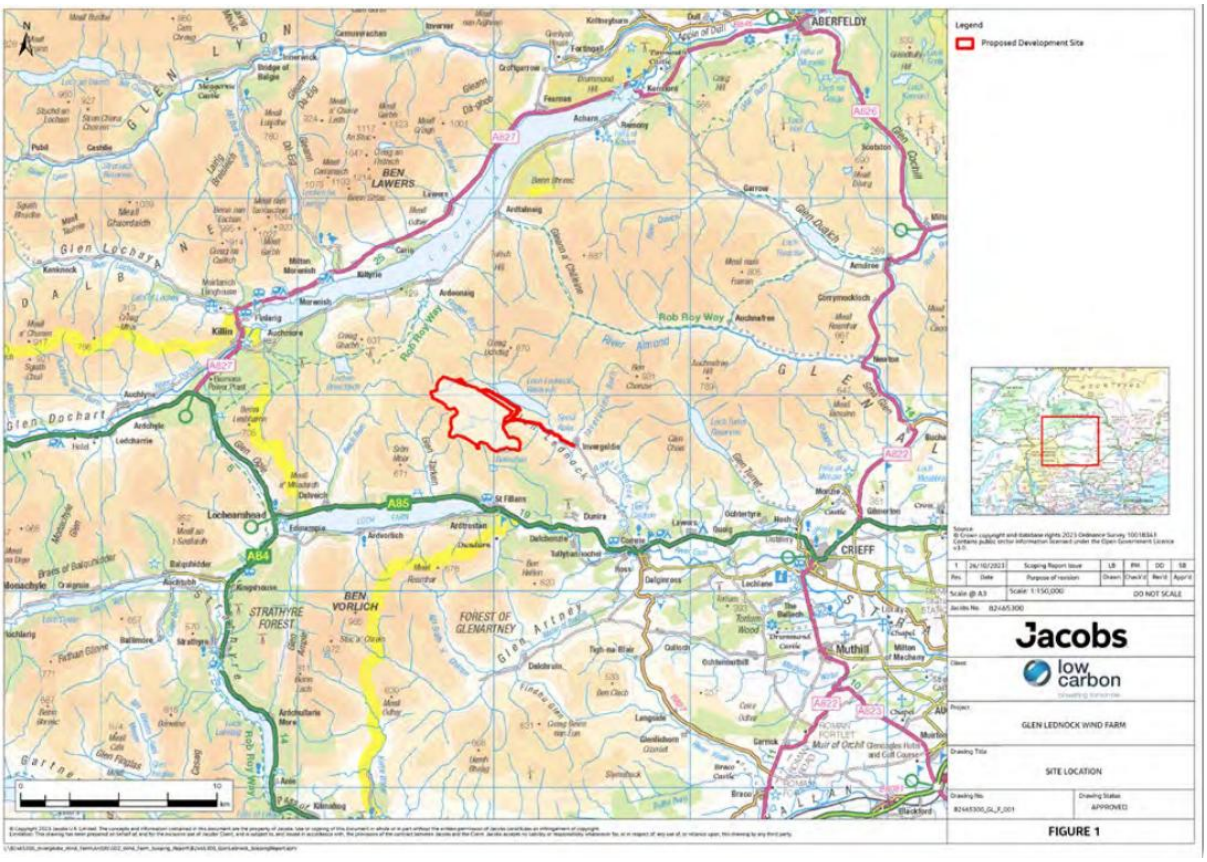

Figure 1: Site location in red and National Park boundary shown in yellow

3.2. The proposed development would be situated in the landscape defined as Upland Summits and Plateaux of the ridge that separates Loch Earn from Loch Tay, southwest of the Glen Lednock reservoir. The hills in this area form the southernmost extent of the Grampian mountains and dominate views from Breadalbane, with St Fillans and Loch Earn back dropped by these hills. High points within the site include Meall nam Fiadh 612m Above Ordnance Datum (AOD) and Meall Reamhar 590m AOD.

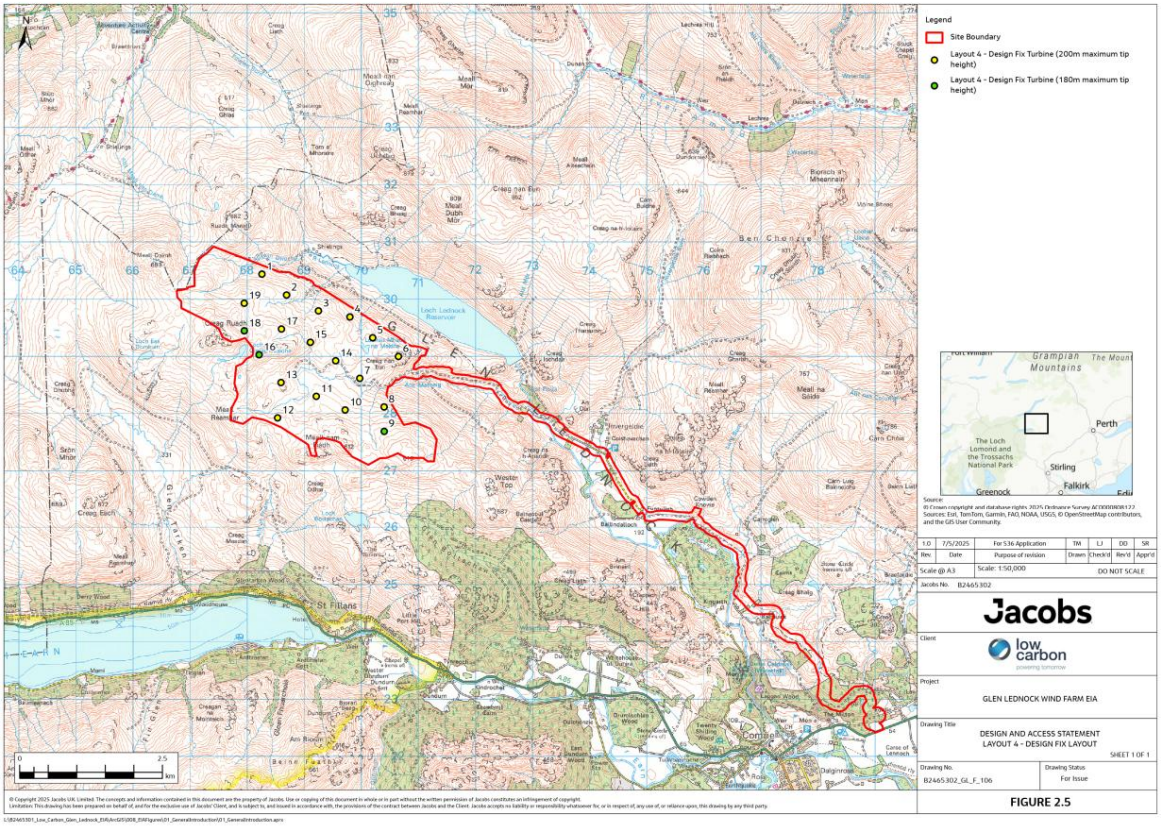

Figure 2: Site location showing proposed access, and turbine development area with National Park boundary in yellow (Extract from EIAR Figure 2.5)

3.3. The site comprises an area of approximately 1,102 hectares (ha) of land of varied topography with mountainous terrain with rocky outcrops. The area in which the turbines would be located covers approximately 895ha.

3.4. Figure 2 above highlights the proximity of the turbines to the National Park Boundary. In addition, the proposal is situated approximately 3km from the River Earn Comrie to St Fillan's National Scenic Area (NSA). The closest Scheduled Ancient Monument to the application site within the National Park boundary is Dundurn Fort, on St Fillans Hill which lies approximately 4km south of the application site.

3.5. The closest long distance walking routes to the proposed turbines include:

- The Rob Roy Way which is located approximately 3km to the northwest of the site and extends into the National Park.
- Glen Tarken Path approximately 1km southeast of the site accessed from the National Park west of St Fillans.

Description of Proposals

3.6. The main components of the proposed development are set out in Chapter 3 of the applicant's Environmental Impact Assessment Report (EIAR) and include the following:

i. 19 wind turbines16 with a maximum tip height of up to 200m and up to three with a maximum tip height of up to 180m with a 40-year life span.

ii. Hardstanding areas at the base of each turbine which includes areas of cut and fill at approximately 30m diameter, (turbine hardstandings), approximately 2,610 m^2 per turbine

iii. Crane hard standings and associated laydown areas with a total permanent area of approximately 5,500 m^2 per turbine, x 19 turbines is a total of 105 m^2 (10.49 hectares)

iv. Site entrance via the A85 bellmouth east of Comrie with around 17,681 m of new access track at 5-6m wide with 15 no. turning heads within the turbine development area.

v. The tracks are proposed to be permanent for the duration of the operation of the wind farm with a total access route area of 18 hectares.

vi. A network of approximately 43,500m of underground cabling to connect each wind turbine to the on-site substation.

vii. Five borrow pits totalling approximately 159,841 m^2

viii. Two temporary concrete batching plants

ix. Construction compounds and laydown areas

x. Thirty watercourse crossings (14 existing and 16 new crossings) including three new bridges.

xi. Meteorological mast at a height of 119m on a hardstanding footprint of 10m by 10m

xii. Electrical substation and control buildings

xiii. Any other ancillary works as required.

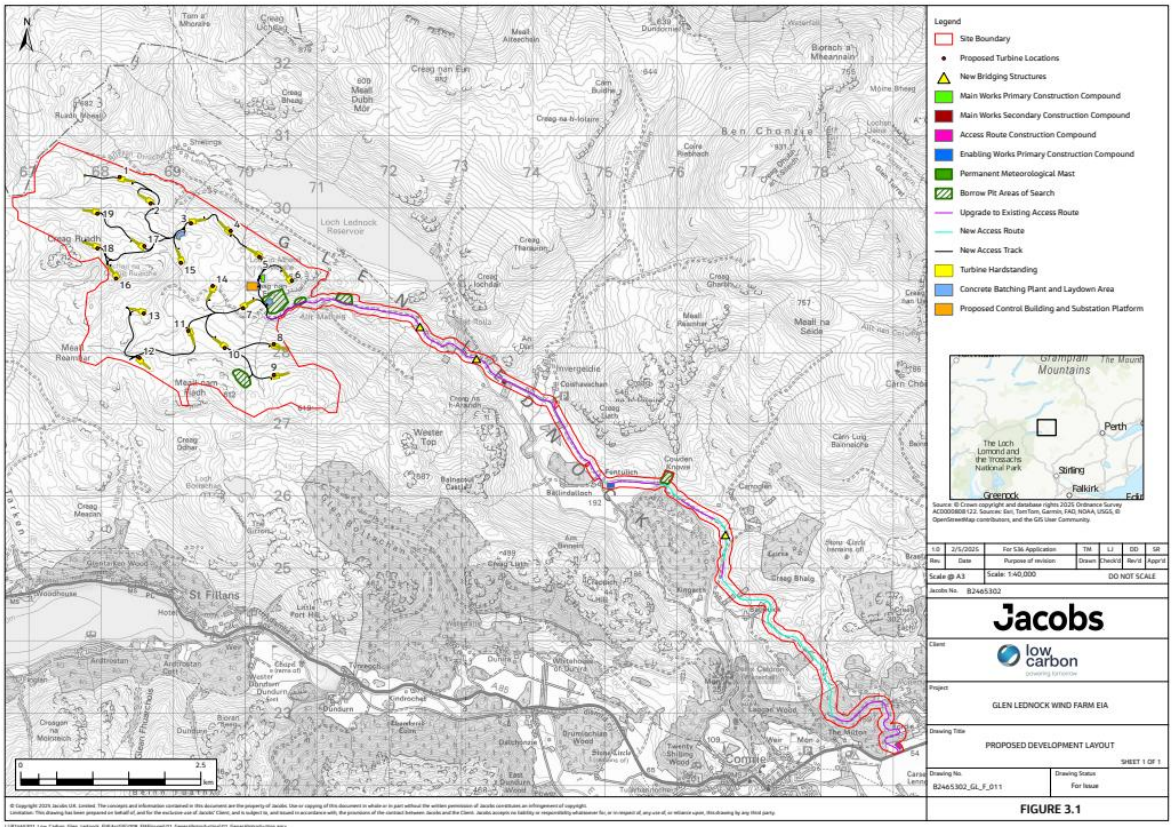

Figure 3 Proposed development layout – extract from EIAR Vol 4 Figure 3.1

3.7. The turbines would be of tapering tubular steel construction, and the blades would be made from fibre-reinforced epoxy. Perth and Kinross Council and the ECU would agree on the final colour, anticipated to be semi-matt white and pale grey. The construction phase is expected to last 24 months. Connecting infrastructure to the National Grid is not yet determined but is anticipated as a combination of overhead lines and underground cables to Killin substation.

3.8. The application includes coordinates of the proposed turbines however their location and other infrastructure including the access track may be subject to micro siting up to 100m in any direction as a result of additional constraints encountered during site works. The turbines are typically fixed to steel reinforced concrete foundations approximately 30m in diameter, 4m in depth subject to ground conditions.

3.9. The proposed development would require visible aviation lighting, it is proposed that 5 of the 19 turbines would have red, medium intensity visible lights.

3.10. The applicant estimates that during the development and construction phase the proposed development will generate a total expected capital expenditure investment of £210.9 million of which £75.9 million potentially benefitting Scottish companies. During each year of the operation phase, it is estimated that the proposed development could generate up to a total community benefit fund of £589,000 per annum over the 40 years operational life totalling £23.6million. In line with Scottish Government best practice principles, shared ownership in the development is offered to local community interest groups. The proposal could potentially generate up to 210 direct, indirect and induced

construction jobs and GVA of £19.1 million in Perth and Kinross, and 739 direct, indirect and induced construction jobs and GVA of £69.5million nationally.

4. Planning History

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

4.2. An Environmental Impact Scoping Request for the site was submitted to the National Park in November 2023 in respect of up to 25 wind turbines with a tip height of 220m for a 40year period. The National Park Authority provided a joint response with Naturescot to the ECU. The subsequent application has reduced the number of turbines by 6 and reduced the maximum blade tip height by 20m.

4.3. An application for another windfarm immediately adjacent to the east at Glentarken (ref. ECU00004700) was reported to the Planning Committee on 30th June 2025, where Committee decided to object to that proposal. The cumulative impact with the Glentarken windfarm (currently remains under consideration by the ECU) is considered in the planning assessment below.

5. Summary of Relevant Supporting Information

Environmental Impact Assessment

5.1. The application is accompanied by an Environmental Impact Assessment Report (EIAR) prepared by the applicant and submitted to the ECU.

5.2. The EIAR 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 the assessment uses an initial study area of 45km and focusses on significant effects which were identified as more likely to occur within 25km of the proposed development.

5.3. 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 upon at the EIA scoping stage. This presents an indication of the potential impact of the windfarm on visitor experience and residential amenity.

5.4. The LVIA includes figures showing the Zone of Theoretical Visibility (ZTV) (attached as Appendix 1). 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.

5.5. 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.

5.6. The EIAR and associated documents can be viewed online via the Energy Consents Unit portal by entering the planning reference ECU00004966 at https://www.energyconsents.scot

6. Context for Assessment

Determining Authority: Role of Scottish Government's Energy Consents Unit

6.1. 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 supporting documents.

6.2. 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. The National Park's response will be given due consideration along with those of the other statutory consultees.

Role of NatureScot

6.3. 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 landscape advice in relation to proposals out with the National Park. However, there may be issues on which both organisations will provide advice, and the agreement 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.

6.4. Landscape comments were provided to the National Park by NatureScot (who have provided their comments separately to the ECU) and our assessment of the predicted impacts on the National Park's Special Landscape Qualities (SLQs) have been discussed and agreed with them. The National Park Authority considered it should submit its own response to the ECU, however officers have ensured that the advice provided to Members, regarding landscape impact, is aligned to that of NatureScot.

National Planning Policy

6.5. The adoption of National Planning Framework 4 (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.

6.6. 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.

6.7. 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).

6.8. 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.

6.9. 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.

6.10. 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

6.11. 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.

6.12. The National Park Partnership Plan – the National Park Plan for Loch Lomond & The Trossachs - and Local Development Plan are material considerations

where proposals outside of the National Park boundary affect the National Park Special Qualities.

6.13. 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.

6.14. The National Park Authority is distinguished from all "non-park authority planning authorities" in that it is bound by the terms of the Act which requires that in the event of a conflict between its statutory aims, it must give greater weight to the first aim which is to conserve and enhance the natural and cultural heritage of the National Park. The ECU are not bound by this duty in the same way.

National Park Partnership Plan (2024-2029)

6.15. 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.

Loch Lomond and Trossachs National Park Local Development Plan (2017-2021 LDP)

6.16. 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: This states:

  "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"

6.17. 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

6.18. 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.

6.19. 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.

6.20. 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.

7. National Park Authority's Planning Assessment

7.1. As a consultee for this proposal which lies out with the National Park, the National Park Authority's focus for comments is effects on the Special Landscape Qualities. However, it is 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 considered in the assessment below.

Landscape considerations

7.2. Chapter 6 of the EIAR and Appendix A 6.5 therein 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.

7.3. 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 these settlements, there is also a large caravan park on the southern shore of Loch Earn, Ardtrostan, close to St Fillans, around 4km from the proposed development turbines. There are no residential properties within the Park Boundary that are within 2km of the turbines.

7.4. 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. These are qualities that are perceived and experienced by people affecting the sense of place.

7.5. The Special Landscape Qualities (SLQ's) have 8 overarching qualities that apply throughout the entire National Park. This is followed by a list of SLQs specific to each of four landscape sub-areas with the relevant area affected by Glen Lednock windfarm being Breadalbane.

7.6. The General overarching SLQs which apply to the National Park are:

- A world-renowned landscape famed for its rural beauty;
- Wild and rugged highlands contrasting with pastoral lowlands;
- Water in its many forms;
- The rich variety of woodlands;
- Settlements nestled within a vast backdrop;
- Famous through routes;
- Tranquillity and
- The easily accessible landscape splendour.

7.7. 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;
- Sinuous Glen Falloch.

7.8. The Landscape Visual Impact Assessment (LVIA) submitted within the EIAR (Special Landscape Qualities Assessment Appendix A6.5) identifies that the proposed development shows the potential for significant effects on two overarching Special Landscape Qualities of the Loch Lomond and Trossachs National Park. These are:

- Wild and rugged highlands contrasting with pastoral lowlands: and
- Tranquillity.

7.9. The EIAR assessment also shows the potential for significant effects on two SLQ's of Breadalbane:-

- Steep mountains and long glens: and
- Wide and straight Loch Earn.

7.10. The EIAR concludes that the proposal would result in a moderate impact on the overarching SLQ's *wild and rugged highlands contrasting with pastoral lowlands* and the overarching SLQ *tranquillity* would be moderately impacted on which would **not be significant.** *Wide and straight Loch Earn*, *surrounded by high mountains* would also **not be significantly affected.** Due to the assessment of a medium/slight magnitude of change on the SLQ *steep mountains and long glens, with* its high sensitivity there would be a moderate impact which would be **significant.**

The National Park's Assessment of Landscape Impact

Impact on Special Landscape Qualities

7.11. The National Park considers that the LVIA is underplayed and that the following SLQ's are additionally likely to experience adverse effects resulting from the introduction of the proposed development, some significant and adverse.

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

7.12. The National Park Authority consider the LVIA assessment that there would be significant adverse effects on the 'wild and rugged highlands contrasting with pastoral lowlands' Special Landscape Quality. The National Park disagrees with the applicant's assessment that adverse effect on the Breadalbane SLQ *steep mountains and long glens* would "only" be experienced from Ben Vorlich and consider there would be a notably larger scale change than the medium/small scale reported.

7.13. The LVIA ZTV's (Appendix 1) show theoretical visibility of the proposed development across some key high points, elevated areas and some lower elevated areas of the Breadalbane area within the northeastern part of the National Park. Key viewpoints (VP's) are shown at Appendix 2.

7.14. From Ben Vorlich (VP11), there would be a notably larger scale change than the medium/small scale reported. Although there is some evidence of man-made influences including windfarms from this viewpoint and Meall an t-Seallaidh, (VP15) these are seen in successive views away from the site of the proposed development and which forms part of the wider undeveloped upland plateau and helps to contribute to qualities of tranquillity experienced from summits and glens.

7.15. As shown by Viewpoint 4 (VP4) Loch Earn south side: "*The back road along the southern shore meanders in and out of the woods, and provides a quiet contrast to the trunk roads that normally traverse these Breadalbane glens"* some of the turbine hubs and blade tips would impinge on the: *"narrow strip of level ground between the loch and the hill slopes,".* Much of the southeastern side of Loch Earn is shown to be within ZTV coverage. the National Park Authority disagrees with the applicant's assessment that the turbines would be seen as: "*relatively small scale and incidental".* A number of turbine hubs and blades would be clearly evident on the skyline seen in northward looking views from southwestern sides of the Loch including from Ardtrostan within approximately 4 km from the proposed development.

7.16. The National Park Authority consider that these effects will be significant and adverse on the Breadalbane SLQ's '*A landscape of distinctive glens and straths'* and '*wide and straight Loch Earn*'.

7.17. The proposed development would introduce an incongruous man-made element interrupting the synergy of the upland landscape, northward and eastward looking parts of some of the dramatic panoramas distinctive to a number of Breadalbane hilltops, ridges and slopes. 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 Loch Earn 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.

<u>Landscape Character and Visual Effects</u>

7.18. The visibility of the proposed development from the viewpoints within the National Park boundary is shown within the submitted photomontages within EIAR Volume 5 (set out below in Appendix 2 Figures).

7.19. The National Park Authority considers that several of the landscape and visual effects have been underplayed within the submitted LVIA. The submitted photomontages (Appendix 2) 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.

7.20. 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 National Park Authority 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 4: Loch Earn south side
- Viewpoint 11: Ben Vorlich
- Viewpoint 15: Meall an t-Seallaidh
- Viewpoint 18: Bheinn Bhreac

7.21. 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.

7.22. The proposed Glen Lednock windfarm would introduce a dominant man-made element in close proximity to the National Park boundary. Located within the Summits and Plateaux-Tayside landscape character type, this backdrops Loch Earn and the proposal would be evident south of Lochearn, from Ben Vorlich, Meall an t-Seallaidh and Bheinn Bhreac.

7.23. Night-time Visibility: Night-time viewpoints within the National Park are provided for Viewpoint 4: Loch Earn south side and Viewpoint 11 Ben Vorlich. NatureScot visited the viewpoint at Ben Vorlich at night and has advised that the manipulated day time photography (used to show night-time effects) does not represent the baseline as it would be experienced in reality and it is not fit for purpose. They have identified that that some other sources of artificial light are present at lower elevations in the base line which is not shown in the manipulated day time visual within the LVIA. It is therefore not a true representation of the nighttime effects from this proposal at Ben Vorlich.

7.24. Cumulative Impact: Adjacent to the site lies the proposed Glentarken Windfarm, an application which was considered by the Planning Committee on 30 June 2025 (ECU00004700). That proposal is located on land to the west of the application site in the neighbouring landscape characteristic terrain, across a similar part of the broad upland plateau at as the site area. That proposal is for 12 turbines at 180m to the blade tip.

7.25. The introduction of the proposed development directly east of application Glentarken would extend the presence and influence of wind farm development experienced from slopes and summits within Breadalbane within ZTV coverage. The National Park Authority considers that where visible, both the proposed development and the development proposed at Glentarken would read as one large wind farm. The proposed development is likely to have a greater effect given the larger number of turbines (19) and larger height of the 16 turbines at 200 m to blade tip height. This is illustrated in the ZTV at Appendix 1 entitled 'Cumulative Blade Tip ZTV of both Glen Lednock

and Glentarken'). The last figure at Appendix 2 (viewpoint from Ben Vorlich summit) shows the visual impact of Glen Lednock windfarm proposal in culmination with the Glentarken windfarm.

7.26. The National Park Authority considers that under a scenario that would see the introduction of both the proposed development and application Glentarken Wind Farm that this would result in significant adverse cumulative effects on the following General SLQs:-

- Wild and rugged highlands contrasting with pastoral lowlands;
- Tranquillity; and
- The easily accessible landscape splendour.

7.27. And specifically on the Breadalbane SLQ's:-

- Steep mountains and long glens;
- A landscape of distinctive glens and straths; and
- Wide and straight Loch Earn.

7.28. The 'Cumulative Location Plan' at Appendix 3 shows the location of the proposed development in context with other windfarms. The proposed Glen Lednock turbines are shown in blue and the proposed Glentarken wind turbines in yellow. Existing operational windfarms are shown as black and consented windfarms are shown in green.

7.29. The nearest operational windfarm on this side of the National Park is Brae of Doune approximately 15km to the south. Griffin lies approximately 18.5km to the northeast and Calliachar approximately 16.5 km to the northeast. Those turbines range in height from 109.8m – 124m which are substantially smaller that the proposed turbines and distant from the National Park by comparison.

7.30. The proposed development, either separately or in combination with Glentarken windfarm, would introduce windfarm development of a much greater scale and in much closer proximity to National Park boundary in this area than any wind farm to date.

Summary of Landscape Impacts

7.31. The Zone of Theoretical Visibility (ZTV) analysis presented within the LVIA shows widespread theoretical visibility of the proposed development within 25km across the north and eastern area of the National Park and the Comrie to St Fillans National Scenic Area (NSA).

7.32. There would be a step change in prominence and proximity of wind farms to the National Park with 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 peaks of Ben Vorlich, Meall an t-Seallaich 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'.

7.33. From key summits assessed within the National Park, the proposal would introduce a large scale vertical man-made focal point into an area of undeveloped upland presently devoid of wind farm development.

7.34. The proposal would result in a fundamental shift in both the proximity of wind turbine development to the National Park boundary on this north eastern edge and the scale of the wind turbines (proposed at up to 200 m in height) in an area currently devoid of windfarm development.

Conclusion on Landscape Matters

7.35. The National Park Authority agree with NatureScot's assessment as follows:

- 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, and Meall an t-Seallaich 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 along the southern shore of Loch Earn, the Proposal would affect the contrast between lowland and highland.

7.36. In addition to the above, the recently considered submitted proposal for a windfarm at Glentarken, with turbines appearing at a similar altitude, the two schemes would be read as one noticeably increasing the number of turbines visible from Ben Vorlich.

7.37. 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.

7.38. 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 where windfarms are not a visible feature in the wider landscape.

Planning Policy Consideration

7.39. Unlike planning applications considered under the terms of Section 25 of the Planning Act, the Development Plan does not form 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.

7.40. As already noted, National Planning Framework 4 introduces a significant adjustment 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).

7.41. 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.

7.42. 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.

7.43. 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 on the qualities for which the area has been designated are clearly outweighed by social, environmental or economic benefits of national importance.

7.44. In terms of part (ii) benefits, chapter 13 of the EIAR sets out the assessment of the proposed benefits on climate change and the potential contribution of the development to the Scottish Government's net zero greenhouse gas emission target by 2045. Para 13.6.20 states that "*the calculations of total carbon dioxide emission savings and payback time for the Proposed development indicates that the overall expected payback period will be approximately 0.7years when compared to the fossil fuel -grid mix of electricity generation and 1.4 years when compared to the grid mix of electricity generation."* The proposal development would take approximately 1.4 years to offset the carbon exchange to the atmosphere (the CO2 debt), following this time period the site (para 13.6,21) "*can then claim to contribute to national emissions reduction objectives thereafter for its remaining operational life".*

7.45. The potential socio-economic benefits (set out in Chapter 14 of the EIA Volume 1 Main Report – Socio- Economics, Tourism and Recreation) include the creation of up to 210 direct, indirect and induced construction jobs and GVA of £19.1 million in Perth and Kinross. Up to 739 direct, indirect and induced operational jobs and GVA of £69.5 million at the Scottish level. The proposed £589,000 annual fund for the local community (£23.6 million over

the lifespan of the development) is based on a community benefit fund of £5000 per MW of installed WTG generation output per annum throughout the operational period of the proposed development. It is important to note that this is a voluntary contribution and therefore cannot be a significant material planning consideration.

7.46. 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.

7.47. The proposed windfarm would be the closest sited windfarm to the National Park boundary and would bring the proximity of windfarm development much closer than any other to date (as reported to the ECU on the currently pending Glentarken windfarm). The introduction of large turbines up to 200m in height 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.

7.48. This proposal would also set a landscape precedent for further windfarms in this area including the adjacent Glentarken 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).

7.49. 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.

7.50. 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.

7.51. NPF 4 Policy 11 - part 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.

7.52. 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 40 years. The methodology for doing this will be the responsibility of Perth and Kinross Council.

Conclusion

7.53. The proposed windfarm and associated infrastructure would introduce a transformational change to the existing pattern of windfarm development seen from Breadalbane. It would bring wind turbine development much closer to the National Park boundary and introduce large turbines in the wider landscape to the north east of the National Park which is currently devoid of windfarms. 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.

7.54. 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 have a significant adverse impact on a number of the Special Landscape Qualities which are integral to the National Park designation. The proposal is therefore 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 National Park designation.

7.55. 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.

7.56. It is therefore recommended that the National Park Authority object to the proposal. for the reasons set out in Section 2 of this report.

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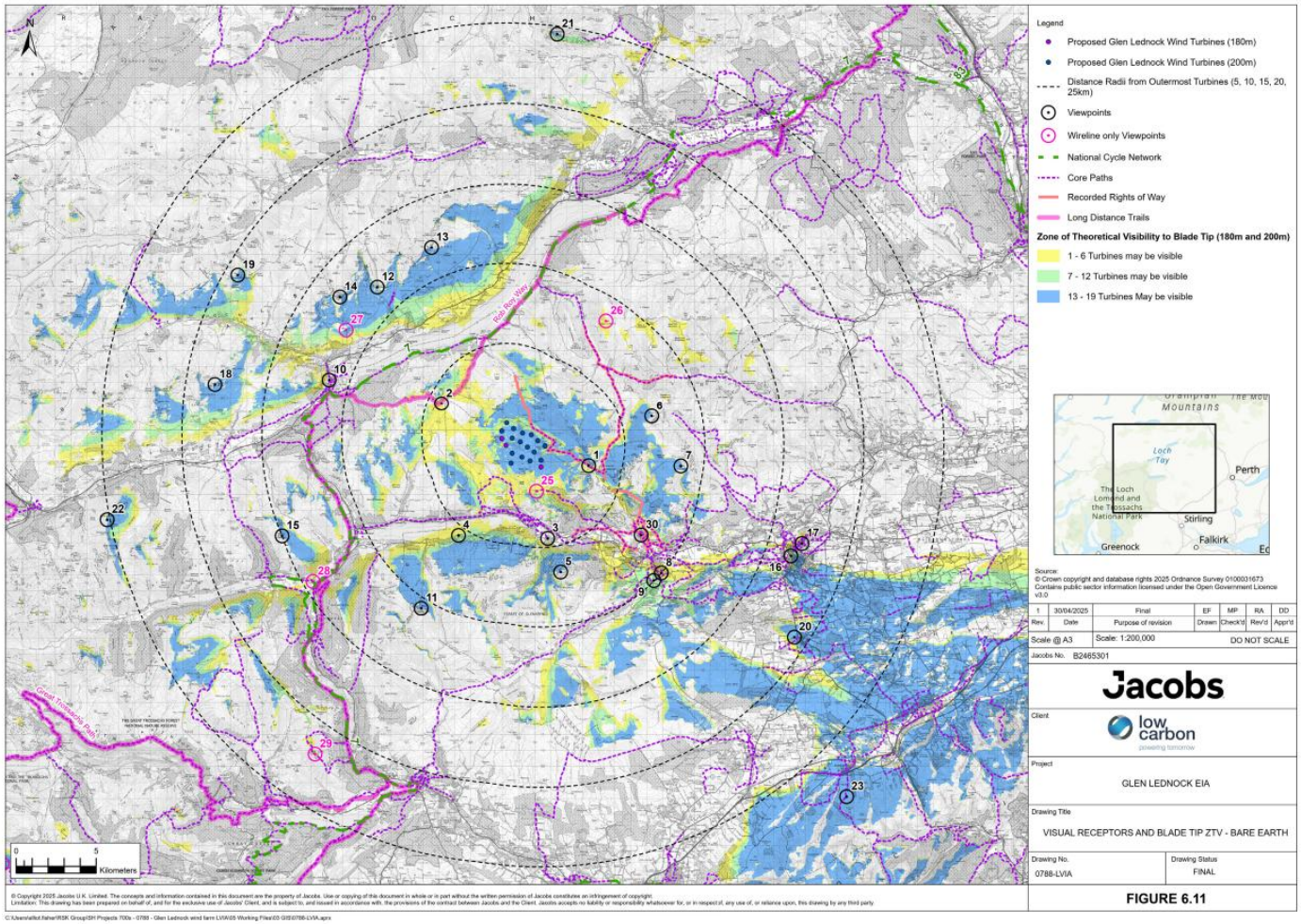
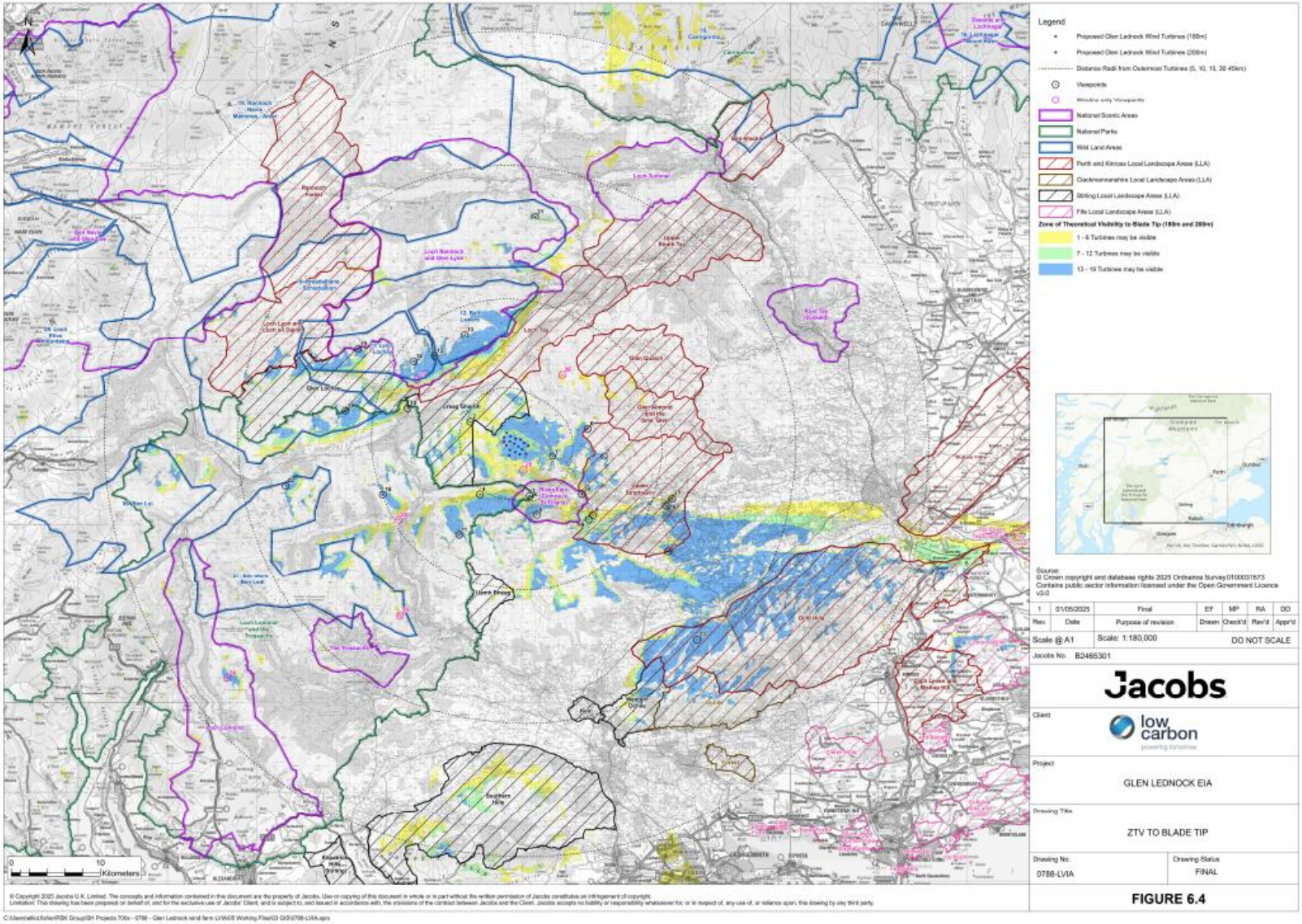
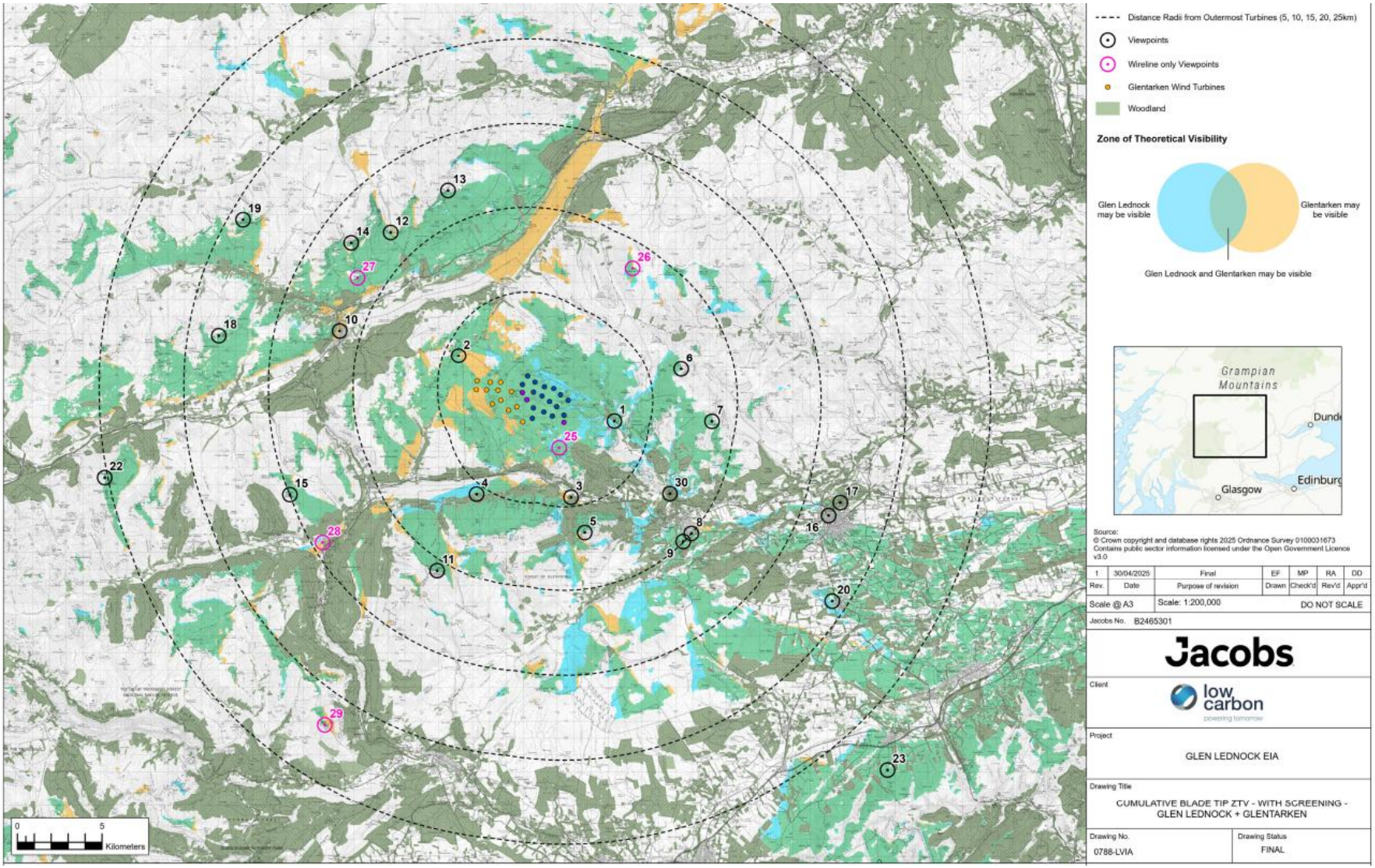
Appendix 1: Zone of Theoretical Visibility (ZTV)



EIAR Vol 4 - Figure 6.11 Visual receptors and ZTV (bare earth)



EIAR Vol 4 Figure 6.4 - Landscape Designations ZTV

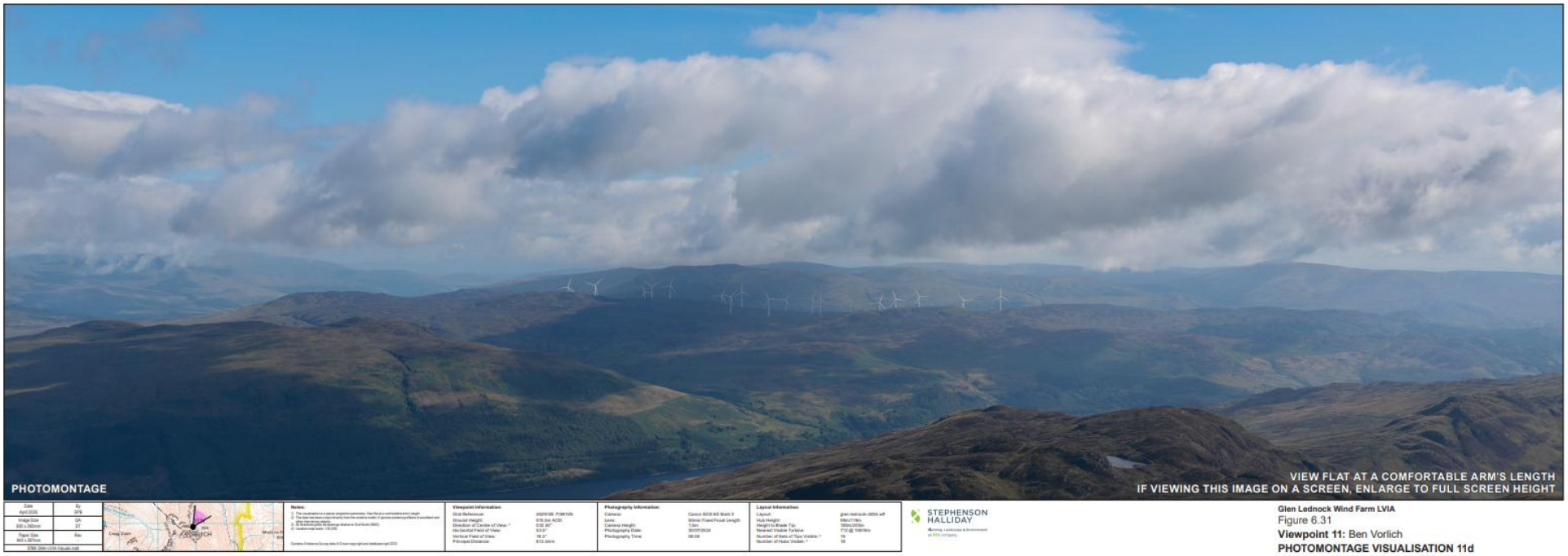


EIAR Vol 4 Figure 6.19- Cumulative Blade Tip ZTV of both Glen Lednock and Glentarken

Appendix 2: Viewpoint Photomontages

EIAR Vol 5 - LVIA Figure viewpoint 3 – Dundrun/ St Fillans Hill at 177m AOD

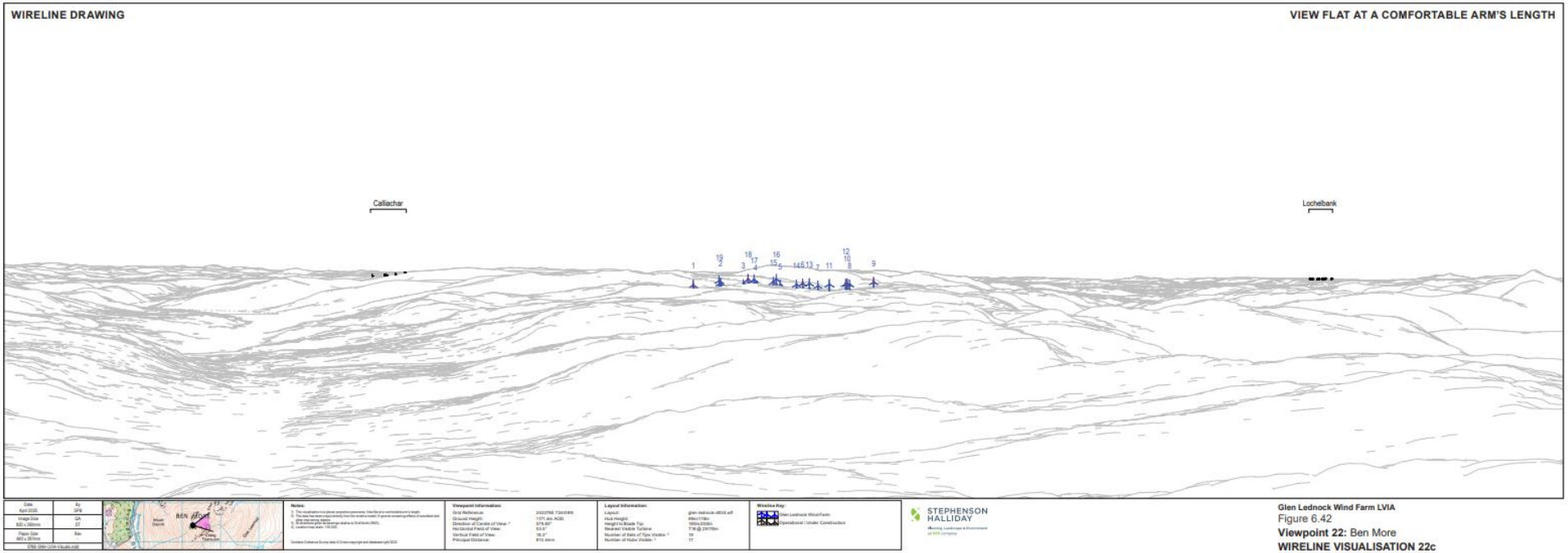
EIAR Vol 5 - LVIA Figure viewpoint 4 –Loch Earn south side at 96.4 m AOD



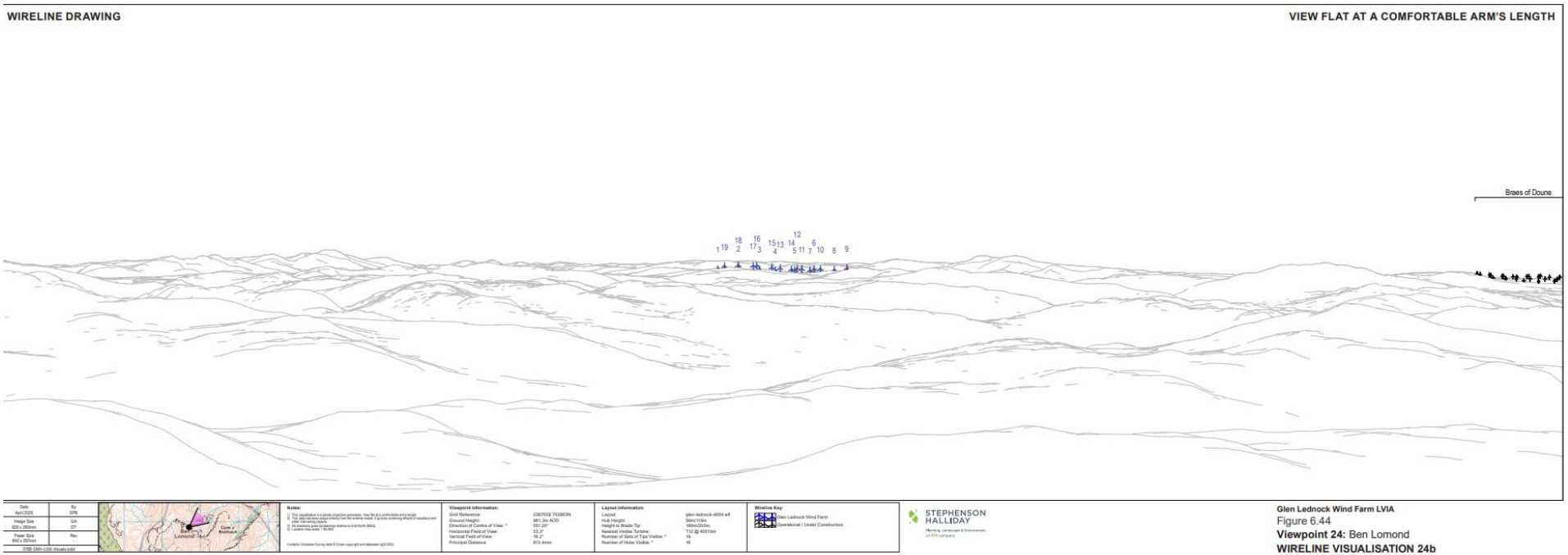
EIAR Vol 5 - LVIA Figure Viewpoint 11 –Ben Vorlich from summit at 974.5 m AOD

EIAR Vol 5 - LVIA Figure Viewpoint 15 – Meall an t-Seallaidh summit at 850 m AOD

EIAR Vol 5 - LVIA Figure Viewpoint 18 –Bheinn Bhreac summit at 795.1 m AOD



EIAR Vol 5 - LVIA Figure Viewpoint 22 –Ben More summit at 1171.4 m



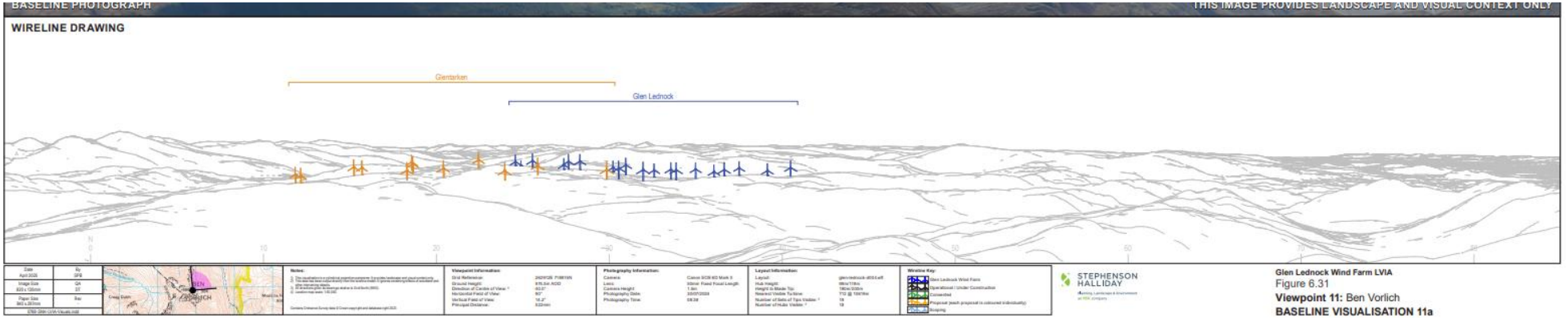
EIAR Vol 5 - LVIA Figure Viewpoint 24 –Ben Lomond summit at 1171.4 m

Further wireline-only visualisations are submitted in the EIAR Vol 5 from the following viewpoints within the National Park boundary which show minor impact:

Viewpoint 10 - Breadalbane Park, Killin (EIAR figure 6.30)

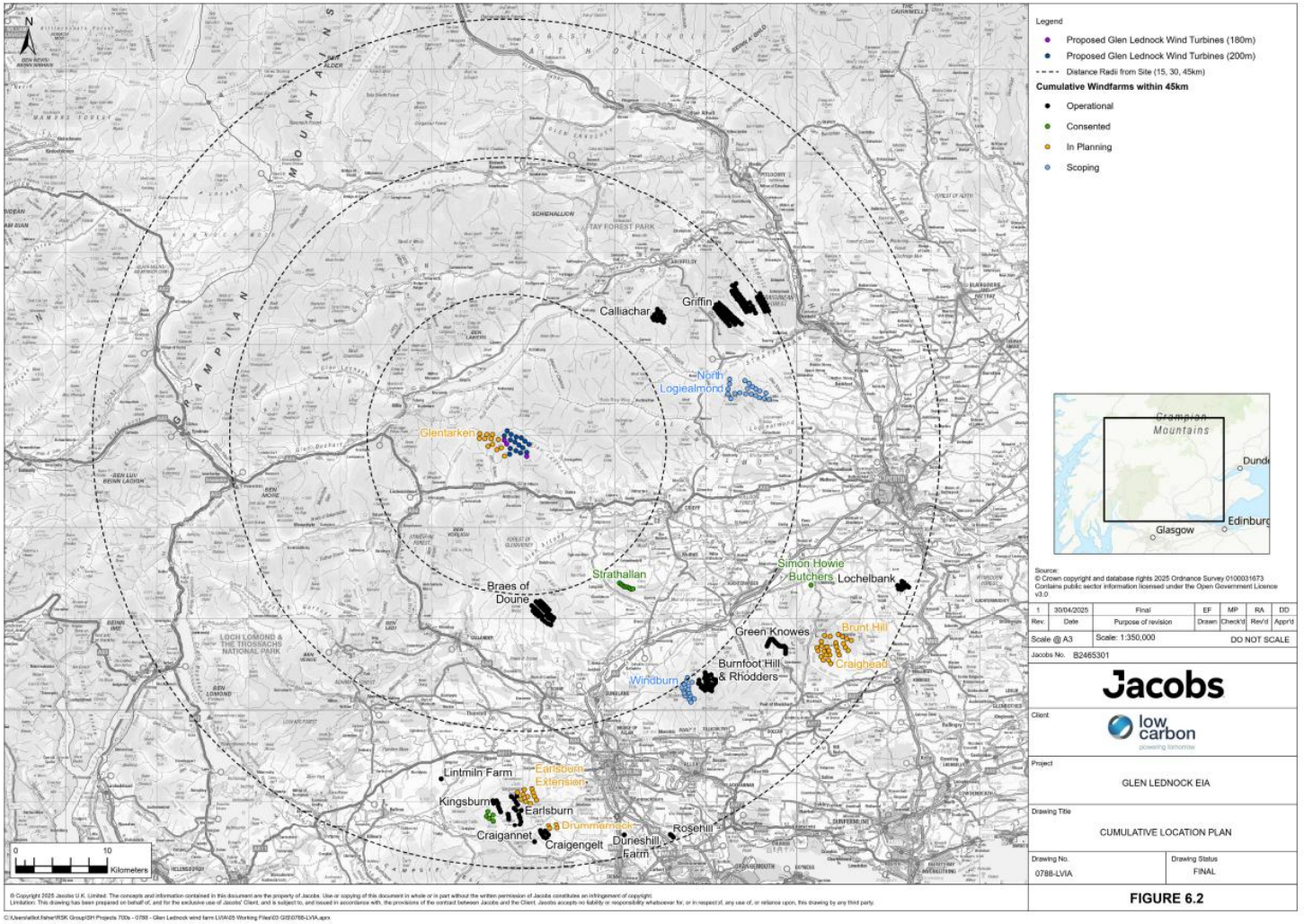
Viewpoint 28 – Auchtubh (EIAR figure 6.48)

Viewpoint 29 – Ben Ledi (EIAR Figure 6.49)



The above wireline drawing from the EIAR Vol 5 from VP 11 Ben Vorlich summit looking northwards to the site presents the visual cumulative impact of both the application site – Glentarken windfarm annotated yellow (12 WTG) , and Glen Lednock windfarm annotated in blue (19 WTG), with some overlap between the two windfarms, a potential of 31 wind turbines ranging from 180m to 200m in height.

Appendix 3: Cumulative Location Plan



EIAR Vol 4 Figure 6.2 Cumulative Location Plan