
Report to PLANNING COMMITTEE

Date of Meeting: 15 January 2026

Subject: Application 25/00120/S36 - CONSULTATION FROM SCOTTISH MINISTERS REGARDING AN APPLICATION MADE UNDER SECTION 36 OF THE ELECTRICITY ACT 1989, FOR THE INSTALLATION AND OPERATION OF A WIND FARM COMPRISING UP TO 13 WIND TURBINES, 35MW OF BATTERY ENERGY STORAGE AND ASSOCIATED ANCILLARY INFRASTRUCTURE, PARTIALLY IN CLACKMANNANSHIRE AND PARTIALLY IN PERTH AND KINROSS

At: Unnamed Top Approx 1km East Of Blairdenon Hill Rhodders Farm Access Alva Clackmannanshire (to be known as “The Windburn Wind Farm”)

Report by: John Hiscox (Principal Planning Officer)

1.0 Purpose

- 1.1. To request that the Planning Committee accepts the recommendation of the Council's Planning Service in relation to the proposed Windburn Wind Farm, in its capacity as statutory consultee, being one of two relevant authorities within whose Council areas the development is proposed.

2.0 Recommendations

- 2.1. It is recommended that Clackmannanshire Council, as relevant authority and statutory consultee to Scottish Ministers, raises a planning objection for the following reasons:
1. By virtue of the scale, layout, design and location of the development and siting of the turbines as proposed, it would give rise to harmful landscape and visual impacts that are greater than localised, and that would be unacceptably adverse both locally within the Ochil Hills, and in the wider locale of the settled lowland/Carseland areas to the south. Specifically, the impacts set out below are unacceptable and have not been adequately mitigated.
 - (i) the introduction of visible large-scale, static man-made components (towers, hubs) and moving blades to the otherwise uninterrupted main scarp skyline of the Ochil Hills which forms an iconic, regionally unique and important setting in combination with the settled Carselands of Clackmannanshire, and a landscape asset recognised for its special qualities through its designation as a Special Landscape Area (SLA).

- (ii) diminishment of the special qualities attributed to the Ochils SLA, thereby damaging the integrity of the asset as a whole, in the light of harmful impacts (a) to the scarp skyline setting as seen from the lowlands/Carselands to the south as a result of the turbines not being fully contained by the Southern Scarp hills; and (b) on views from the renowned viewpoint destination summit of Ben Cleuch and its environs, over Strathallan and the distant Highlands.
- (iii) harmful visual impacts relating to the experience of recreational users of the Ochil Hills including a sense of wildness, due to the step-change increase in significant visibility of turbines from the open-access/informal recreational path network, including incremental enclosure of views from the locality of the network, in particular insofar as it relates to routes to and from the highest destination summit of Ben Cleuch, and related summits on the network including The Law, Ben Ever and The Nebit, which currently do not have any visibility of wind turbines.
- (iv) characterisation of the Ochils SLA through intensification of adverse cumulative landscape impacts in combination with existing wind farm development, thereby desensitising and reducing the landscape quality of the SLA, thereby rendering it more susceptible to, and more likely to be subject to further pressure for, additional wind farm development.

The proposed wind energy development, therefore, is contrary to the development plan, specifically National Planning Framework 4 Policies 4 and 11; and Clackmannanshire Council Local Development Plan Policies SC14, SC15 and EA4, and adopted Supplementary Guidance “Onshore Wind Energy (Adopted 2015).

3.0 Considerations

3.1 Background and Planning History

- 3.2 The Scottish Ministers, via the Energy Consents Unit (ECU), have formally consulted Clackmannanshire Council in respect of the above application submitted to them under Section 36 of the Electricity Act (1989). As the proposed development would exceed 50MW of electrical generation (installed capacity), the application falls to be considered under this Act by the Scottish Ministers and not the local planning authority as a planning application under the Town and Country Planning (Scotland) Act 1997.
- 3.3 Under the Scheme of Delegation, responses to consultations on national or major development which do not require the permission of the Council as planning authority (as is the case here) require to be considered by the Council's Planning Committee.
- 3.4 An Objection by Clackmannanshire Council as Statutory Consultee, being one of two Council areas within which the development would be situated, would automatically trigger a Public Local Inquiry (PLI), if said Objection is made to Scottish Ministers within the prescribed timescale. The prescribed timescale can be extended if the relevant planning authority, the Applicant and the ECU are all in agreement. Perth & Kinross Council is the other authority within

which the development would be located. Its formal consultation response will be submitted independently to that of Clackmannanshire Council.

- 3.5 This is the first application to be made on the site for a wind farm, although the project has been through pre-application scoping, through which relevant agencies and consultees set out their requirements relating to what should be included in the necessary Environmental Impact Assessment. The relevant planning history is as follows:

Windburn Wind Farm:

- 3.6 23/00268/FULL – Erection of temporary meteorological mast – Approved 4.4.04

23/00100/PAN – Erection of 15 no. wind turbines (up to 149.9m blade tip height) and ancillary infrastructure including battery storage – Pre-Submission Public Consultation – Council response 24.5.23

SCOPING CONSULTATION (no Council reference number allotted) – Council response 28.4.23

Burnfoot East Windfarm:

- 3.7 17/00026/FULL – Extension to existing windfarm, comprising installation of 3 no. wind turbines, crane hardstandings, access tracks, temporary construction compounds, borrow pit and ancillary work (extension to Burnfoot Windfarm) – Approved 27.3.19

Rhodders Windfarm:

- 3.8 11/00299/FULL – Extension to existing windfarm, comprising 6 no. turbines, wind monitoring mast, switchgear building, temporary construction compounds and ancillary work – Amended proposal (west of original Burnfoot Hill Windfarm) – Appeal Allowed 21.1.14

Burnfoot Hill Windfarm:

- 3.9 06/00121/FULL – Installation of 13 wind turbines, anemometry mast, switchgear building, site tracks and excavation of stone from 2 borrow pits – Approved 30.3.08 (all turbines within Clackmannanshire)

Site Location and Description

- 3.10 According to Chapter 2 of the submitted EIA Report, the site, which measures approximately 1,474ha, is centred on NGR NN 87737 02889, is located in the Ochil hills, across the administrative boundaries of both Clackmannanshire and Perth & Kinross Councils, and is predominantly used for sheep grazing, forestry, and water abstraction. The Ochils in general are used by hill walkers and other recreation users such as runners and cyclists.
- 3.11 The site is characterised by sloping expanses of moorland at typical elevations of between 142m-677m Above Ordnance Datum (AOD). There are several hills within the site boundary, with the highest summit being Ben Buck at 679m AOD. The area in which the wind turbines are proposed is located on the upland plateau, between 450m – 555m AOD. The site is intersected by a

number of small tributaries including Finglen Burn, several of which flow to the Allan Water and the River Devon (via the Upper Glendevon Reservoir).

- 3.12 The viewpoint summit of Ben Cleuch (721m AOD) is situated around 800m to the south-east of the site boundary.
- 3.13 Access to the site is proposed to be taken from the A9, travelling south-west along the C468/Sheriffmuir road, and then turning off, at Carim Lodge, onto a purpose-built site access track. There are no proposed delivery or construction routes for traffic, including Abnormal Loads Vehicles, within Clackmannanshire. Access would be taken from within Perth & Kinross.
- 3.14 *Landscape Character:* Within Clackmannanshire, the entire site including turbines is within the 'Lowland Hills – Central' Landscape Character Type (LCT), as designated by NatureScot in 2019. Within this overarching LCT, two Landscape Character Areas (LCAs) are defined within the 2015 Supplementary Guidance 'Onshore Wind Energy' as 'Ochil Hills: Western Peaks'; and 'Ochil Hills, Southern Scarp'. The wind farm would be situated principally within the first of these although T1 and T2 are in the second, and visibly related to the latter because turbines would be seen above the southern scarp.
- 3.15 There are no statutory environmental designations within the site boundary. However, the southern part of the site is located within the Ochils Special Landscape Area (SLA) designation. The northern part of the site is located within the Ochil Hills Local Landscape Area (LLA) which is a local landscape designation within the Perth and Kinross Council area.
- 3.16 The Local Development Plan includes Appendix EA1: *Special Landscape Areas – Statement of Importance*. The following commentary from this document is relevant (LDP Page 168):

Key Landscape and visual characteristics:

- 3.17 The Ochils form a stunning backdrop to Clackmannanshire with a dramatic contrast in topography between the steep profile of the hills and the flat valley floor of the Devon Valley to the south. The contrast is emphasised by the rough vegetation and craggy outcrops of the scarp slope.

Special qualities:

- 3.18 The rising steep hill slope above the Hillfoot settlements to high moorland plateau in a compact form is a unique feature in Central Scotland. Rock outcrops on the southern face of the hills offer evidence of the geological past of Central Scotland. The large-scale topography of rounded slopes and hill summits is dramatic, with rolling grassy or peaty ridges and braes. The southern escarpment is incised by a number of dramatic and scenic gorges, including those of Mill Glen, Alva Glen and Dollar Glen. The character of the SLA is enhanced by elements of cultural heritage including a number of hill forts, and Castle Campbell, which sits within Dollar Glen.

Striking Views:

- 3.19 The southern hill summits offer panoramic views of the meandering upper Forth, and its progression as a widening estuary to the sea, as well as views

eastwards to the Forth bridges and southwards across the Forth Valley to the Slamannan Plateau and Bathgate Hills. Hill summits in the vicinity of Ben Cleuch offer views over Strathallan as well as distant views of the Highlands to the north. The Ochils are in themselves a striking landscape feature in the landscape of Central Scotland, rising from the floor of the Forth Valley.

Sensitivity to Change:

- 3.20 The southern scarp slope is an especially important local and regional feature which requires to be protected from insensitive development. This is especially important at a local level in the vicinity of the glens which stretch back into the hill massif. The Ochils, in comparison with the rest of Scotland have an average wildness value, however, when compared with adjacent areas of the Central Belt they have a high wilderness value even though the artefacts of modern Scotland are clearly viewed from the hills. This regional factor supports a restrictive planning approach in the Ochils.
- 3.21 The Ochils have two essential landscape components, the high plateau and the dramatic southern escarpment. The plateau is a large scale, simple landscape of tightly knit hills capped by smooth rounded tops. It is mainly peaty ground with extensive stretches of grass and some heather moorland. It is uninhabited, exposed high ground crossed by paths with a high level of recreational use. It forms a prominent visual backdrop to the lowlands to the north. The southern escarpment is also a prominent visual backdrop to the carseland to the south and the wider central Scotland lowlands. Its slope is strongly fissured by deep glens with minor watercourses and rocky outcrops with native woodland in the glens and southern edge of the escarpment. Glen footpaths provide access to the high plateau. The ruggedness of the scarp, and the wide visibility of the Ochils, combined with their location adjacent to populated areas, gives them a unique character within Scotland. This character is highly valued both locally and in the wider area resulting in this landscape having a high sensitivity to change by all forms of development which requires a more restrictive planning policy approach.
- 3.22 Surrounding Area: The immediate surrounding area is rural in nature, with no occupied residential properties located within approximately 2.5km of the proposed turbines. There are several settlements in the wider surrounding area. To the south of the site, in Clackmannanshire, are the towns of Alva (approximately 2.9km from the application boundary at its closest point, 3.2km from the nearest proposed turbine), Menstrie (approximately 3.1km from the application boundary at its closest point, 4.5km from the nearest proposed turbine) and Tillicoultry (approximately 3.8km from the application boundary at its closest point, 4.5km from the nearest proposed turbine).
- 3.23 The south-eastern extent of the site lies within the River Devon surface water catchment. The eastern extent of the site is located within a sub catchment of the River Devon (named 'source to Gairney Burn confluences').
- 3.24 The entire land area is subject to Scottish Open Access Rights under The Land Reform (Scotland) Act 2003, and is well used for recreational access, The Ochils being a recognised recreational destination with long-established pathways providing routes that connect summits, often accessed from Clackmannanshire (Alva, Menstrie, Tillicoultry, Dollar).

- 3.25 There are no Core Paths within the site. The Blackford to Tillicoultry Path, which is a Core Path, Heritage Path and Recorded Right of Way, passes close to the site in Perth & Kinross.
- 3.26 Operational Wind Farms Nearby: The operational Burnfoot Hill (13 turbines up to 102m tip height), Burnfoot East (3 turbines up to 135m tip height), Burnfoot North (2 turbines up to 102m tip height), and Rhodders (6 turbines up to 102m tip height) wind farms are located immediately to the east of the site (closest turbines within 1km of the proposed turbines). In addition to these, the following operational and consented wind farms are within 10km of the proposed turbines:
- Green Knowes Wind Farm – 18 turbines (93m to tip height), Operational, located approximately 6.6km to the north east;
 - Strathallan Wind Farm – 9 turbines (93m to tip height), Consented (phase 1 i.e. four turbines, is operational, with phase 2 i.e. the remaining five turbines to follow), located approximately 7.9km to the north west.
- 3.27 'In Planning' Wind Farms: Craighead Wind Farm and Brunt Hill Wind Farm are both currently 'in planning' and are located approximately 12km and 14km east of the proposed development. Both are outwith Clackmannanshire, but would be visible from the County.

Description of the Development

- 3.28 It is intended that the Windburn Wind Farm would be operational (lifespan) for up to 40 years, at the end of which the wind farm would be decommissioned.
- 3.29 Within Clackmannanshire, 8 wind turbines with a blade tip height of 149.9m and a hub height of approximately 80m would be installed (T1-T8 inclusive), along with associated access tracks, crane hardstandings, laydown areas, a borrow pit and 2 temporary construction compounds. The remaining 5 turbines, a separate borrow pit, substation compound and Battery Energy Storage System area (BESS), plus the main access track and site entrance would be within Perth and Kinross.
- 3.30 The development comprises the following elements:
- (i) 13 three-bladed horizontal axis turbines up to 149.9m tip height with a combined rated output in the region of approximately 65MW
 - (ii) Foundations, per turbine, approximately 22.4m diameter, 2.5m deep
 - (iii) Crane hardstandings, per turbine, approximately 41.5m x 36m and 1m in depth
 - (iv) Approximately 3.76km of upgraded road and 14.54km of new access tracks with a typical running width of 6m, associated drainage and up to three new watercourse crossings (both within Clackmannanshire)
 - (v) Approximately 15.74km of underground cabling along access tracks to connect the turbine locations, and the onsite electrical substation
 - (vi) 100m x 75m substation compound, accommodating switchgear to collect electricity from different parts of the site (this component within Perth & Kinross)
 - (vii) Control and metering building (16m x 30m x 8m high) – within substation compound (this component within Perth & Kinross)

- (viii) Battery storage facility up to 35MW capacity with ancillary equipment such as inverters- within substation compound (this component within Perth & Kinross)
- (ix) Up to two borrow pits, covering approximately 0.89 hectares (for extraction of stone to build tracks/hardstandings)
- (x) Three temporary construction compounds, covering approximately 1.78 hectares.

3.31 Temporary construction compounds tend to include the following:

- temporary modular building(s) to be used as a site office;
- welfare facilities;
- parking for construction staff and visitors;
- reception area;
- fuelling point or mobile fuel bowser;
- secure storage areas for tools; and
- waste storage facilities.

3.32 Options to use floating tracks would be available where they cross deep peat (1.68km identified).

3.33 At this time, it is proposed that transformer units would be internal, within the turbine towers, therefore external structures not required.

3.34 The base height of each turbine AOD would be as follows:

T1 – 536m
T2 – 507m
T3 – 551m
T4 – 544m
T5 – 530m
T6 – 554m
T7 – 533m
T8 – 500m
T9 – 524m (P & K)
T10 – 480m (P & K)
T11 – 490m (P & K)
T12 – 461m (P & K)
T13 – 451m (P & K)

3.35 None of the turbines would require to be fitted with aviation lighting on the hub/nacelle, because the tip height is below 150m. At 150m or above, visible red hub/nacelle lighting is always required on at least some of the turbines in accord with Civil Aviation Authority (CAA) obligations. Below 150m, there tends only to be a requirement for infrared lighting on towers, which is not visible to the human eye. In this case, no visible aviation lighting is proposed.

3.36 A micro-siting allowance is also applied for, which would allow 50m tolerance for turbine locations, along with all other site infrastructure. This would permit the developer, in consultation with its Ecological Clerk of Works (ECoW) to reposition components of the scheme, if consented, by up to 50m without the need to obtain consent from the planning authorities.

- 3.37 The application indicates that the construction period would be approximately 24 months. Construction hours are proposed to be 07:00 to 19:00 Monday to Friday and 07:00 to 16:00 on Saturdays. Out of necessity, some activities, for example abnormal load deliveries, concrete deliveries during foundation pours, and the lifting of turbine components, may occur outside the specified hours stated (excl. Sundays). Any works above and beyond these tasks and outwith these days / hours would not be undertaken without prior approval from Clackmannanshire Council, and/or Perth and Kinross Council.
- 3.38 Soils: The site contains significant amounts of peat. The peat resource would be impacted, therefore mitigation, restoration and re-use would be undertaken in accordance with a Peat Management Plan (for example, see EIA Chapter 10 and Technical Appendix 10.2, Parts 1, 2 and 3).
- 3.39 In total, approximately 10.03ha of blanket bog habitat (including already degraded bog habitat) would be permanently lost as a result of the proposed development. This permanent loss represents approximately 0.68% of the area of the site. In addition to this, approximately 43.42ha of blanket bog habitat (including already degraded bog habitat) would be indirectly or temporarily affected as a result of the proposed development. This indirect and temporary loss represents 2.9% of the area of the site. As a result of this, the proposed development includes the proposal for approximately 251.31ha of active blanket bog restoration, and approximately 360.59ha of blanket bog restoration through grazing management. **All of the proposed blanket bog restoration would take place within the application site.**
- 3.40 Soils would be used for reinstatement works associated with access tracks, cable trenches, turbine foundations, crane hardstandings, borrow pits and the temporary construction area. The upper vegetated turfs would be used to dress infrastructure edges, and to reinstate the surface of restoration areas. It is anticipated that most of the soil resources within areas directly affected by construction activities would be able to be stored and reinstated as close as possible to where they were excavated, in accordance with best practice; so that the site would be restored with minimal movement of material from its original location. It is not anticipated that any excavated material would leave the site.
- 3.41 According to the outline Habitat Management Plan (oHMP), 14.43 hectares of riparian woodland planting is intended (native species). The locations for this planting are identified on Figure 8.4.1 within the oHMP – around 1km would be outwith the application site (southern section in Clackmannanshire, east of Bengengie Hill).
- 3.42 Decommissioning: According to EIA Chapter 15, at the end of its operational life, the proposed development would be decommissioned in accordance with a Decommissioning and Restoration Plan, unless an application is submitted and approved to extend the operational period or to repower the site. The decommissioning period would be expected to take up to one year.
- 3.43 Decommissioning would comprise the following:
- dismantle turbines and remove from site for re-use or to be recycled;

- the top 1m of the turbine foundations, crane hardstandings and substation compound foundations would be removed and disposed of appropriately (areas to be reprofiled with soil and reseeded);
- access tracks would be left in-situ, to reduce potential environmental impacts associated with potential sediment migration into watercourses as a result of removing all tracks;
- watercourse crossings and underground cables would also be left in-situ (cables 'made safe');
- all equipment from within the substation compound would be removed from site and either reused, recycled or disposed of appropriately. Oils or lubricants from the compound would be removed and disposed of appropriately. The control building, and related infrastructure, would then be demolished and all materials would be reused, recycled or disposed of appropriately;
- The full battery energy storage system would be de-energised and then any battery units, transformers or other electrical equipment that is re-usable, carefully dismantled and removed. Cables and buried services would be removed. The area of the battery energy storage system would then be regraded and blended into the surrounding ground.

3.44 **Grid Connection:** The current consultation under Section 36 of the Electricity Act 1989 does not include proposals for connection to the electricity grid. A separate consent under Section 37 of the same Act would be necessary. This would be subject to a future consenting process, in relation to which Scottish Ministers would again be the determining body. Depending on the location of the proposed development, Clackmannanshire Council may be a consultee. Consultation under Section 37 of the Act is highly similar to that under Section 36.

Submission Documents

3.45 The application submission includes the following key documents submitted by the applicant:-

- (i) Environmental Impact Assessment Volume 1: Non-Technical Summary
- (ii) Environmental Impact Assessment Volume 2: Main Report
 - Chapter 1 – Introduction
 - Chapter 2 – Site Description and Design Evolution
 - Chapter 3 – Description of Development
 - Chapter 4 – Renewable Energy and Planning Policy
 - Chapter 5 – Environmental Impact Assessment
 - Chapter 6 – Scoping and Consultation
 - Chapter 7 – Landscape and Visual
 - Chapter 8 – Ecology
 - Chapter 9 – Ornithology
 - Chapter 10 – Hydrology, Hydrogeology, Geology
 - Chapter 11 – Cultural Heritage and Archaeology
 - Chapter 12 – Traffic and Transport
 - Chapter 13 – Socio-Economics, Tourism and, Recreation & Land Use
 - Chapter 14 – Other Issues
 - Chapter 15 – Schedule of Commitments
- (iii) Environmental Impact Assessment Volume 3: Figures
- (iv) Environmental Impact Assessment Volume 4: Technical Appendices

- (v) Planning Statement
- (vi) Design and Access Statement
- (vii) Pre-Application Consultation Report

Consultations

- 3.46 Roads and Transportation Team – No objection (no conditions recommended).
- 3.47 Environmental Health – No objection; recommends conditions relating to (i) limitation of operational noise from the wind farm (turbines) (ii) implementation of a Construction and Environmental Management Plan (iii) mitigation relating to private water supplies serving business premises in Menstrie.
- 3.48 Regional Archaeologist – No objection subject to a condition requiring archaeological evaluation prior to commencement of development, potentially including excavation works on the development site.
- 3.49 Sustainability Team – Has not indicated objection. Provides advice and guidance relating to (i) impacts on core paths and the recreational resource (ii) impacts on existing habitat (Alva Moss Candidate Local Nature Conservation Site) (iii) impacts on protected species, in particular bats (iv) Blanket bog loss – mitigation/restoration matters (v) wider impacts on habitat (connections between nature networks including RAMSAR sites) (vi) need to develop a decommissioning and restoration plan relating to the end of the lifespan of the wind farm.
- 3.50 Landscape Consultant (External) – Full Report attached to this Committee Report as Appendix 1. As an external independent consultancy, it is not within its remit to either recommend support or objection to the consultation. However, the Report indicates that the proposed development would give rise to adverse landscape and visual impacts of such significance that it would be necessary to make major changes to the scheme bring it into the realms of acceptability, in terms of protecting public amenity interests.

Publicity and Representations

- 3.51 The Application will be determined by Scottish Government as Determining Authority. As a result, all notifications, public consultation and advertisements are administered by the ECU. Interested/third party representations fall to be considered by ECU, not Clackmannanshire Council as local planning authority. Community Councils are statutory consultees, and must also submit their consultation responses to the ECU.
- 3.52 A letter dated 24 June 2025, from SLR Consulting Limited as agent, to the ECU advises that the following advertising regime would be rolled out:
- “The applicant will arrange for the advertisement of the notice of application and accompanying EIA Report in accordance with the requirements of the Electricity (Applications for Consent) Regulations 1990 and the EIA Regulations. Copies of the notices will be provided to ECU once advertised. The newspaper adverts will be published as follows:*

- *The National (for one week);*
- *The Courier (for two weeks);*

- *The Alloa Advertiser (for two weeks); and*
- *The Edinburgh Gazette (for one week).*

Copies of the application documentation including the EIA Report will be made available for public viewing at the following locations during the dates specified in the public notices:

- *Speirs Centre. Library Services, Clackmannanshire Council, Speirs Centre, Primrose Place, Alloa, FK10 1AD;*
- *Perth and Kinross Council Headquarters, Pullar House, 35 Kinnoull St, Perth, PH15GD; and*
- *Auchterarder Library, Chapel Wynd, Auchterarder, PH3 1BL.*

Copies of the application documentation have also been made available for download from the project website at: • <https://windburnwindfarm.co.uk/>

- 3.53 The Committee is advised that interested/third party representations including submissions by Community Councils and interest groups do not fall to be considered as material planning considerations by Clackmannanshire Council. However, Members may wish to note that at the time of writing of this report, the ECU has published 51 representations on its website in relation to the proposed Windburn Windfarm.

The Development Plan

- 3.54 The development plan for the area currently comprises two main items: (i) National Planning Policy Framework 4 (2023); and (ii) the Clackmannanshire Local Development Plan, adopted August 2015. Associated LDP Supplementary Guidance was also adopted in August 2015 (“Onshore Wind Energy”). Whilst the development plan is not afforded primacy for the determination of applications made under Section 36 of the Electricity Act (as is the case for planning applications under the provisions of Section 25 of the Planning Act), it is nevertheless a key material consideration that is entitled to a substantial amount of weight in the decision-making process, particularly as the application is also seeking deemed planning permission under Section 57 of the Town and Country Planning (Scotland) Act 1997 as part of this process.
- 3.55 The 2015 LDP includes a Spatial Strategy for Clackmannanshire, with three separate areas identified as Forth, West Ochils and East Ochils. The proposed development is entirely within the West Ochils area, within which, according to the LDP (Page 19) the following LDP Aims are relevant to the proposals:
- Reinforce the green network and increase recreational opportunities through projects such as the Gartmorn Dam Green Hub and Ochils Landscape Partnership (under ‘Social Infrastructure’)
 - Balancing protection and enhancement of the countryside with opportunities to maintain and develop the economic vitality and viability of settlements (Under ‘Development In The Countryside And The Rural Economy’)
 - Improve local business opportunities and promote leisure and tourism (under ‘Business and Employment’)
 - (i) Support the Ochils Landscape Partnership (OLP) aims of increasing access to the hills and glens of the Ochils, improving the quality of our

- rivers, and restoring parts of the historic built landscape. (ii) Protect landscape character and the setting and identity of settlements (under 'The Natural Environment')
 - Ensure no significant adverse environmental impacts from development and strive to improve water quality. Protect significant soil resources (under 'Protecting Environmental Resources')
- 3.56 Proposals for renewable energy developments are generally considered under LDP Policy SC14, which states that the Council will support development proposals for all renewable energy generation, including any mitigation measures proposed, where they meet criteria relating to the following:
- landscape and visual impacts, having regard to design, scale, layout and cumulative impacts with other developments;
 - the impact on natural and historic environment (including cultural heritage and biodiversity; also including cumulative effects);
 - impact on aviation, defence or telecommunications interests;
 - impact on local communities and individual dwellings, having regard to cumulative impacts with other developments;
 - the impact on tourism, recreational interests and public access;
 - the nature of proposed mitigation and restoration during construction, operation and decommissioning;
 - compliance with other specified Policies of the LDP (EA13, SC14-18).
- 3.57 Development Management considerations in respect of wind energy proposals are contained within LDP Policy SC15. The policy states that proposals for wind energy development, including associated infrastructure, will normally only be supported where the proposal:
- satisfies the criteria contained in Policy SC14 'Renewable Energy';
 - accords with the guidance contained in the Onshore Wind Energy SG; and
 - will not have adverse effects on the integrity of the Firth of Forth SPA, either alone or in combination with other projects and plans
 - has regard to the provisions of Policy EA13 – Significant Soil Resources.
- 3.58 It goes on to state:

"Proposals will be assessed against the relevant locational guidance contained in the spatial frameworks for wind turbines, and on landscape sensitivity contained in the report titled 'Sensitivity of the Clackmannanshire Landscape to Wind Turbine Development', June 2012.

Proposals within Areas of Search are likely to be supported subject to detailed consideration against identified criteria in the Onshore Wind Energy SG.

Proposals within Areas of Significant Protection (see Figures SC1 and SC2) are unlikely to be considered favourably, unless it can be demonstrated that the proposal would not have an unacceptable adverse impact on the relevant features of the Area that justify its status.

Proposals within Areas of Potential Constraint will be judged on their individual merits against the criteria set out in the relevant policies and the guidance in the Onshore Wind Energy SG.”

- 3.59 The Onshore Wind Energy Supplementary Guidance (2015) provides a spatial framework relating to three turbine ‘typologies’, or height ranges. The typology most relevant to the proposed Windburn Windfarm, whose turbines are proposed at 149.9m to tip, would be ‘Large Turbine (over 80m to tip)’. When the LDP and this SG were in preparation, turbine heights were generally lower across the board. Technological developments have resulted in substantial increases, with many schemes in Scotland now including turbines whose tip heights are 180m, 200m, 230m and 250m. The Spatial Strategy is therefore not fully up-to-date in this regard. However, it provides a competent guide to where the most likely suitable sites for the upper scale of turbines may at least be considered.
- 3.60 Map 1, on Page 9 of the SG shows that the site for the Windburn Windfarm is within an Area of Significant Protection for large turbines. Essentially this means that although individual proposals for wind energy development can be considered (Areas of significant protection do not equate to a blanket restriction on wind turbine development in these areas), further consideration will be required to demonstrate that any significant effects on the qualities of these areas can be substantially overcome by siting, design or other mitigation.
- 3.61 *Landscape Sensitivity:* On Pages 43 and 44 of the SG, commentary is provided regarding the findings of a 2012 Landscape Sensitivity Study commissioned by the Council and NatureScot. Both Landscape Character Areas (“Ochil Hills: Western Peaks” and “Ochil Hills: Southern Scarps”) are considered in detail. The following commentary is of relevance here:

“Overall the Ochil Hills: Western Peaks is assessed as having a higher sensitivity to wind turbine development. It is a large-scale, simple landscape, with convex skylines, all of which indicate lower sensitivity, but the high level of recreational use of the landscape suggest higher sensitivity. The widely visible nature of this landscape, particularly from areas to the north, also indicate higher sensitivity to wind turbines.

In conclusion, it would be very difficult to accommodate new wind turbine development in the Ochils due to the likely cumulative landscape and visual effects. Modest extensions of existing wind farms are more likely to be accommodated, provided that the unity and scale of the present wind farm in relation to landscape context is maintained.

Overall the Ochil Hills: Southern Scarp is assessed as having a higher sensitivity to wind turbines. There are few features which indicate any reduced sensitivity within this landscape. The scarp is a prominent feature seen from a large area of central Scotland; from Stirling, Falkirk and West Lothian, and from the M9 and the Edinburgh-Glasgow railway line. The remarkable steepness and ruggedness of the scarp, combined with its wide visibility and location adjacent to populated areas, gives it a unique character within Scotland, and it is highly valued both locally and in the wider area.

Siting of wind turbines on the upper parts of the hills would place them in a potentially overbearing position in relation to the scarp, particularly if located close to the edge of the scarp. Wind turbines atop the Ochils would interrupt the distinctive skyline.

This landscape is highly sensitive to wind turbine development, and all types of development should be discouraged within this area.”

- 3.62 NPF4 sets out how the Scottish Government’s approach to planning and development will achieve a net zero, sustainable Scotland by 2045. The Spatial Strategy sets out that we are facing unprecedented challenges and that we need to reduce greenhouse gas emissions and adapt to future impacts of climate change. It sets out that Scotland’s environment is a national asset which supports our economy, identity, health and wellbeing. It sets out that choices need to be made about how we can make sustainable use of our natural assets in a way which benefits communities.
- 3.63 The Spatial Strategy reflects legislation setting out that decisions require to reflect the long term public interest. However, in doing so it is clear that decision makers will need to make the right choices about where development should be located, ensuring clarity is provided over the types of infrastructure that needs to be provided, and the assets that should be protected to ensure they continue to benefit future generations. Indeed, it states simply, on page 7 that: this means ensuring the right development happens in the right place.
- 3.64 In its capacity as a consultee for the development, the key matters where the Council can provide an informed response, insofar as it has access to expertise (including from internal consultees) relate to the following considerations:
- Renewable Energy Benefits;
 - Socio-economic Benefits;
 - Landscape and Visual Impacts (including cumulative impacts);
 - Archaeology and Cultural Heritage;
 - Effects on Local Communities and Residential Interests;
 - Roads, Traffic and Access; and
 - Flood Risk.
- 3.65 Other matters which are relevant considerations in terms of development plan policies and national policies but which have not been included in the list above, such as (but not limited to):- Natural heritage impact including ecology and ornithology, fish and forest / woodland cover, Hydrology, Hydrogeology, and Peat, and impact on aviation safety, defence and telecommunications, are all matters for Scottish Ministers to consider in accordance with consultation responses that they have received directly from individual consultees in respect of these topic areas in their decision of the proposal.
- 3.66 Although the Council’s Sustainability Team has provided a consultation response that includes reference to natural heritage matters (published on the Council’s website 8.8.25), it is not intended to review natural heritage impacts in detail within this planning report, because this is a specialist area more appropriately appraised by Ministers’ consultees that specialise in such matters, namely:

- (i) Scottish Environmental Protection Agency (**Peat**)
- (ii) Scottish Wildlife Trust (**Local Nature Conservation Site**)
- (iii) Scottish Forestry (**Tree Felling and Planting**)
- (iv) NatureScot (**Ecology and Biodiversity**)
- (v) RSPB Scotland (**Ornithological Impacts**)

3.67 At the time of writing of this report, neither NatureScot nor RSPB Scotland have responded to the formal consultation by Scottish Ministers. It is understood that NatureScot has agreed a time extension with ECU to provide a formal response by 31 January 2026. It is also understood that ECU is pressing RSPB Scotland for a consultation response, noting matters raised by the Scottish Wildlife Trust in its formal submission to Ministers, which reflects matters raised by the Council's Sustainability Service in respect of RAMSAR sites.

4.0 Planning Assessment

4.1 The key NPF4 policies are considered to be:

Policy 1 – Tackling the climate and nature crises
 Policy 2 – Climate mitigation and adaptation
 Policy 3 – Biodiversity Policy
 Policy 4 – Natural places Policy
 Policy 5 – Soils
 Policy 6 – Forestry, woodland and trees
 Policy 7 – Historic assets and places
 Policy 11 – Energy
 Policy 12 – Zero waste
 Policy 13 – Sustainable transport
 Policy 18 – Infrastructure first
 Policy 20 – Blue and green infrastructure
 Policy 22 – Flood risk and water management
 Policy 23 – Health and safety
 Policy 25 – Community wealth building
 Policy 29 – Rural development
 Policy 33 – Minerals

4.2 The key LDP policies are considered to be:

Policy SC12 - Development Proposals - Access and Transport Requirements
 Policy SC14 - Renewable Energy
 Policy SC15 – Wind Energy Development
 Policy SC23 - Development in the Countryside - General Principles
 Policy EA1 - Clackmannanshire Green Network
 Policy EA2 - Habitat Networks and Biodiversity
 Policy EA3 - Protection of Designated Sites and Protected Species
 Policy EA4 - Landscape Quality
 Policy EA6 – Woodlands and Forestry
 Policy EA9 – Managing Flood Risk
 Policy EA11 – Environmental Quality
 Policy EA12 – Water Environment
 Policy EA13 – Significant Soil Resources
 Policy EA18 – Minimising Waste in New Development
 Policy EA20 – Other Archaeological Resources

4.3 Statutory Supplementary Guidance to the LDP:

SG2: Onshore Wind Energy

4.4 Other Material Considerations:

Clackmannanshire Council Climate Change Strategy (including Climate Emergency Action Plan) – September 2024
Scottish Government Onshore Wind Policy Statement - December 2022
Historic Environment Policy for Scotland - April 2019
Scottish Government Online Renewables Planning Advice ETSU-R-97: 'The Assessment and Rating of Noise from Wind Farms' (1996)
Planning Advice Note (PAN) 1/2011 - Planning and Noise
Planning Advice Note (PAN) 2/2011 – Planning and Archaeology
Planning Advice Note (PAN) 1/2013 – Environmental Impact Assessment
Planning Advice Note (PAN) 3/2010 – Community Engagement
SNH Guidance Assessing the Cumulative Landscape and Visual Impact of Onshore Wind Energy Developments – March 2021
SNH Guidance Visual Representation of Wind Farms SNH Guidance Siting and Designing Wind Farms in the Landscape (Version 3a – 2017)

4.5 Other National Policies and Strategies

Climate Change Plan 2018-2032 (Scottish Government)
The Climate Change (Emissions Reduction Targets) (Scotland) Act 2019
2020 Routemap for Renewable Energy in Scotland
2021 Net Zero Strategy (UK Government)
Scottish Government draft Energy Strategy and Just Transition Plan and related Ministerial Statement (January 2023)
*Climate Change (Emissions Reduction Targets)(Scotland) Bill – April 2024
(*Made an Act of Scottish Parliament on 22 November 2024)
Scottish Government Scottish Energy Strategy - December 2017

Renewable Energy Benefits:

- 4.6 The Climate Change (Scotland) Act 2009, set out the targets for reducing greenhouse gas emissions as an interim 42% reduction target for 2020 and an 80% reduction target for 2050. The Climate Change (Emissions Reduction Targets) (Scotland) Act 2019 (2019 Act) received Royal Assent on 31 October 2019 and set a target for Scotland to be carbon-neutral, meaning net-zero carbon emissions by 2045 at the latest. Additionally, the 2019 Act set out interim targets to reduce emissions by 56% in 2020, 75% by 2030 and by 90% by 2040. The 2024 Climate Change (Emissions Reduction Targets) (Scotland) Act modifies the 2009 Act, effectively replacing annual and interim targets with carbon budgets. In general terms, this means that every year between 2026 and the net-zero target year (currently 2045), Scottish Ministers must set a carbon budget. Each period covered by a Scottish carbon budget is to be 5 years. Every year, a report must be provided to the Scottish Parliament, by Scottish Ministers, stating how and whether the budget has been achieved. Scottish Government advises on its website that: *“Carbon budgets, which cover a five-year period, provide a more reliable and consistent framework for assessing sustained progress in the actions and*

policies that contribute to ensuring that we achieve Net Zero emissions by 2045.

In comparison, the previous framework of interim and annual targets proved to be highly vulnerable to year-to-year fluctuations in emissions reductions. For example, the assessment of progress could be adversely affected by annual variations, such as a particularly warm or cold winter, or larger events, such as the COVID-19 Pandemic.

The levels of the carbon budget targets will be set through secondary legislation in 2025, following the receipt of the advice from the Climate Change Committee.”

- 4.7 The application indicates that the proposed development has the potential to deliver around 65 Megawatts of power, based on 13 x potential candidate turbines, each generating 5MW. It is estimated that the revised development could give rise to approximately 227.76 Gigawatt hours per annum. The EIA (for example, Volume 1, Section 1.0) indicated that the proposed development could generate enough power to supply up to 70,317 average UK households, calculated based on 65MW installed capacity and each household having an average electricity consumption of 3239 kWh (Calculated using the most recent statistics from Department of Energy Security and Net Zero (DESNZ) showing that annual GB average domestic household consumption is 3,239kWh (as of January 2024).
- 4.8 The proposal for 13 turbines could result in an estimated carbon saving of 99,500 tCO₂ per annum (each year, per 40 years) when compared to a current ‘fossil fuel mix’ carbon intensity factor. The expected carbon losses (new emissions) associated with the proposal are estimated/expected to be around 130,000 tCO₂ equivalent, Although it is not possible to conclude with absolute accuracy the ‘pay back’ period for the scheme, the carbon emissions associated with its construction, operation and decommissioning could be paid for in a period approximating it to 1.3 years.
- 4.9 The above figures, which have not been independently verified, demonstrate that the proposal would positively contribute to the Scottish Government’s target of deploying a minimum of 20 Gigawatts (GW) of installed onshore wind by 2030; and contributing towards achieving the targets set out in the Climate Change Act. It would also contribute to meeting the stated policy outcome in relation to NPF4 Policy 11: “Expansion of renewable, low-carbon and zero emissions technologies.”; as well as the Council’s own Climate Emergency Action Plan, where it is indicated net zero carbon status relating to the Council’s own operations is to be achieved by the year 2040 (Interim target, and for example see Page 17 diagram: “Roadmap to achieve Net Zero for Council’s own operations by 2040”).

Socio-economic Benefits:

- 4.10 NPF4 recognises the opportunities that well planned renewable energy developments can bring to rural communities including associated development, investment and growth of the supply chain. For example, Part 1, Page 16: *“Rural revitalisation, achieved by distributing development, investment and infrastructure strategically and by actively enabling rural*

development in particular, will play an important role in this. Key sectors including energy and food and drink focus on natural resources and provide significant employment in rural parts of Scotland. These sectors also depend on supporting services and access to markets and there is significant potential for associated investment to develop a sustainable supply chain.”

- 4.11 Paragraph 5.1.2 of the Onshore Wind Policy Statement states: *“The socio-economic benefits of the onshore wind sector in Scotland are widespread, from investment and innovation to skills development and jobs. The latest statistics from the UK Government show that onshore wind in the UK generated £2.4 billion in turnover in 2020 alone.”*
- 4.12 Policy 11 of NPF4, in particular 11(c) requires assessment of the net economic impact of proposals, including local and community socio-economic benefits such as employment, associated business and supply chain opportunities. Chapter 13 of the main EIA Report discusses the socio-economic effects of the proposal, in some detail. Its coverage includes construction, operational and decommissioning effects on the economy (including employment generation); and such effects on local recreation and tourism receptors. Significantly, it provides a detailed assessment of impacts on the recreational resource, including at its core, the Ochil Hills.
- 4.13 The EIA Report considers that during the construction and operational phases, the economic impact of the development is expected to contribute as follows:
- An estimated £28.5 million expenditure during the construction phase, approximately £4.7 million of which would be spent in the local (Clackmannanshire, Perth & Kinross and Stirling) economy and approximately £11.8 million in Scotland as a whole;
 - During the 24 months’ construction phase, the proposed development is expected to support, in gross terms, 68 full-time employment roles benefitting local people. Nationally (for Scotland as a whole), the proposed development would be expected to support 166 person-years of employment;
 - During the operational phase, the proposed development is expected to require between 3 and 5 new full time employees (for example, engineers and technicians) locally and further posts created through supply chain effects would be created elsewhere in Scotland.
- 4.14 The economic and employment effects highlighted above provide that the proposal would have a beneficial socio-economic impact through temporary construction employment and indirect employment supported through supply chain linkages in the wider economy, and potential job creation during the operational and maintenance period which are material considerations in favour of the development.
- 4.15 *Community benefits (financial)*: It should be noted that any stated community benefits, which are voluntary initiatives, are not a material consideration in this proposal. The document ‘Scottish Government Good Practice Principles for Community Benefits from Onshore Renewable Energy Developments’ was published in April 2019. Page 10 unequivocally states *“The provision of community benefits (including flexible packages of benefits) is not a material consideration, and has no bearing in the planning process”*. Therefore, any

comments in the EIA (notably paragraphs 13.178 to 13.182 within the EIA Report) and other supporting information within the application in respect of community benefits, are not material considerations. The contribution to non-domestic rates revenues and potential for shared ownership are also not material considerations.

- 4.16 *Specific non-financial local benefits:* The Planning Statement advises under 'Summary of Benefits' that: *"The proposed development also includes proposals for habitat restoration and biodiversity enhancements through blanket bog restoration which are committed to via an outline Habitat Management Plan (HMP). This restoration and enhancement would see an area 251.31ha of active blanket bog restoration."* These projects, which are integral to the proposed development, are further described thus (Paragraphs 50/51):

"51. At the centre of the HMP for the proposed development will be proposals for blanket bog and wet heath restoration. An outline HMP is included in Technical Appendix 8.4 of the EIA Report, which outlines the proposals for approximately 251.31ha of active blanket bog restoration, and approximately 360.59 of blanket bog restoration through grazing management (compared to 53.45ha lost as a result of the proposed development)."

52. Once the proposed blanket bog and wet heath restoration has succeeded, it is considered that it would result in a net positive impact and likely net gain in biodiversity."

- 4.17 The Onshore Wind Policy Statement at paragraph 5.6.5 states: *"The Scottish Government is aware that some communities in Scotland are concerned that the deployment of onshore wind can have a negative effect on tourism. Current evidence suggests that whilst there may be discrete impacts in some cases, this is not the general rule."*
- 4.18 Turning specifically to the matter of potential impacts on the socio-economic status and value of the Ochil Hills (in particular the West Ochils) as a recreational and visitor resource, and thereby having potential to support the local tourism and visitor economy alongside the nearby and related path and access network, the EIA confirms (13.152) that although the site and surrounding area as a recreational resource would be temporarily affected during construction, the temporary nature of the construction and immediate abundance of alternatives results in an overall low magnitude of change, resulting in a negligible (adverse) effect which is not significant.
- 4.19 Paragraph 13.113 of the EIA states: *"The access land in this area is considered to be of local importance and low sensitivity"*. This statement should be read with caution, having regard to the visitor 'draw' to the West Ochils, which are appreciated and cherished as a destination for outdoor recreation, and are considered more likely to be of at least **regional** importance in this context. Indeed, Paragraph 13.176 advises thus: *"Owing to the nationally promoted nature and high level of usage of the Ochil Hills as a recreational asset, the sensitivity is considered to be high."*
- 4.20 Assessment of potential impacts on the recreational resource conclude that *"...there are no significant adverse effects that would require the*

implementation of additional mitigation measures” (13.198). Nevertheless, offsetting measures are proposed, for example extension of an existing path (not Core Path, not Recorded Right of Way) as shown in Figures 13.4a and 13.4b. This path extension is intended to connect an existing established path to the new network of tracks serving the wind farm.

- 4.21 Whilst construction jobs, as in any development proposal, are undoubtedly welcome in terms of providing important employment for local, regional and national supply chains as well as bringing indirect benefits to local businesses in the locality throughout the construction period, they would be short term in duration. As such, it is considered that only limited weight can be given to this benefit when considered against the longer term impacts of the development when in operation. More weight can however be given to jobs during the operational phase of the development.
- 4.22 On the whole, the potential job creation and expenditure during the construction and operational periods of the development are considered to be a positive benefit for the proposal which weighs in its favour to some extent.
- 4.23 Potential adverse impacts on the recreational asset resource are significant, but may not be considered overriding in the light of NPF4 taken as a whole. The significance of such impacts will be further appraised in later sections and conclusions to this report in terms of the ‘planning balance’. The following section of this report makes specific reference to landscape and visual impacts on identified visited/viewpoint summits and is related to impacts on recreational usage.

Landscape and Visual Impacts:

- 4.24 In relation to this development, in particular taking into consideration the location of the site within the Special Landscape Area, potential cumulative interactions with other operational developments (including Burnfoot Hill, Rhodders), and visibility above the southern scarp of the Ochils, consideration of environmental impacts on the landscape resource, and on visual amenity arising from implementation are key issues.
- 4.25 NPF4 has effectively shifted the emphasis of such impacts in the overall planning balance, to one which is obliged to acknowledge that landscape and visual impacts, even if substantial and potentially harmful in this context, are likely to require to be tolerated in the face of climate change, if they can be described to be localised and giving rise to acceptable, adequately mitigated wider adverse impacts.
- 4.26 Within the June 2025 Design & Access Statement (Paragraphs within 2.1 ‘Site Description’) provided by the applicant, it is stated that *“There are no statutory environmental designations within the site boundary. The southern part of the site is located within the Ochils Special Landscape Area (SLA) which is a local designation within the Clackmannanshire local authority area. The northern part of the site is located within the Ochil Hills Local Landscape Area (LLA) which is a local designation within the Perth and Kinross local authority area.”*

- 4.27 It also states in 2.3 'Site Selection Rationale': *"A number of factors were taken into account when considering if the site may be suitable for wind farm development, including:*
- the site is not located in a National Park or National Scenic Area;*
 - initial desk-based studies and wind monitoring on site suggest that there is a very good wind resource;*
 - the distance to settlements and residential properties (no inhabited residential properties within 2.5km of the proposed turbines) minimising potential adverse effects relating to residential visual amenity, and noise;*
 - good existing access options from the public road network (A9 then C468/ Sheriffmuir road);*
 - the site does not support any international or national ecological or landscape designations;*
 - the site is located in central Scotland and has a viable route to the national grid network (anticipated to be via Braco west substation); and*
 - the site is located in an area of the Ochil Hills which has already been subject to onshore wind farm development, as it is adjacent to the operational Burnfoot and Rhodders wind farm cluster. As such the proposed development would add turbines to an area which already hosts onshore wind infrastructure."*
- 4.28 It then advises in 4.2 'Embedded Mitigation': *"Considerable effort was made to produce a turbine layout which achieves the most satisfactory relationship with the landform of the site, whilst respecting other environmental, technical and economic considerations."*
- 4.29 At 5.0 'Design Evolution' the document describes how the initial idea of 10 turbines at 180m tip height developed into the current proposal for 13 turbines at 149.9m tip height. At 8.0 'Conclusion' it is stated that: *"This is considered to be the most appropriate number and size of turbines that can be accommodated by the site, balancing both energy yield and contribution towards renewable energy generation targets, with key planning, technical and environmental constraints."*
- 4.30 Within the Landscape and Visual Impact Assessment, in the concluding Table 7-53 'Summary of Effects', and in relation to the Ochils Special Landscape Area, it is concluded that *"The introduction of the proposed development is not judged to significantly alter the overall integrity of these local landscape designations when considered in this cumulative scenario."* The scenario referred to is the baseline that would be created by operational, consented and proposed wind farm developments, in a cumulative sense.
- 4.31 External Landscape Consultancy Advice (Ironsides Farrar, November 2025)
The external landscape consultancy - Section 4 to 6 - summarises key landscape and visual issues relating to the acceptability of the proposed development, including its adherence to the Council's Supplementary Guidance 2 Onshore Wind Energy (Adopted 2015) and planning policy, and identifies possible opportunities for modifications to the scheme or other mitigations/ compensatory measures which may be beneficial.
- 4.32 Landscape Character Impacts: In Paragraph 2.24 under 'Conclusions on Effects to Landscape' it agrees with the findings of the LVIA identifying a 'Major' significant adverse effect to the character of the host LCT 149 Lowland

Hills – Central, but no significant effects to other landscape character areas/ types within Clackmannanshire. It considers that significant cumulative effects to landscape character within Clackmannanshire would be localised to the site and surrounds of the *Lowland Hills – Central* LCT.

- 4.33 Visual Impacts: There is disagreement relating to adverse visual effects. Although it is agreed that visual impacts would be significantly adverse from Viewpoints 1 (Ben Cleuch) and 2 (The Nebit), it advises that visual impacts relating to Viewpoint 8 (Alloa Tower) and 9 (Clackmannan Tower) would also be significantly adverse, contrary to the findings of the LVIA.
- 4.34 Settlements: It reviews visual impacts in detail, in Paragraph 2.31 agreeing that the settlements of Alloa, Sauchie and Clackmannan/Kennet would be potentially significantly affected by views to the development. For Alloa and Sauchie, while it accepts that the proposals are unlikely to result in an overall significant adverse visual effect across these settlements because of screening elements, it advises that there would likely be localised significant adverse visual effects where turbines become visible (Author's highlighting).
- 4.35 For Clackmannan/ Kennet, it notes that the Viewpoint 9 is somewhat more elevated than the settlement. It advises that although predicted visibility is of 6 tips and up to 4 hubs, in reality visibility would be restricted by buildings and trees. The LVIA assesses a 'Low' magnitude and 'Minor' non-significant effect for the settlement(s) overall, which is a reasonable conclusion, albeit some localised significant adverse effects are likely where unrestricted views are available.
- 4.36 Public Roads: It identifies one road route likely to be significantly affected in terms of visual impacts, being the A908 as users approach Alva/Alva Glen. Up to 3 blades and 1 turbine hub would be visible. However, the commentary tends towards impacts, although significant, being of a localised nature.
- 4.37 Recreational Routes: It identifies significant adverse visual impacts relating to established walking routes within the Ochil Hills, including routes linking The Nebit, Ben Ever, Ben Cleuch and The Law:
- "Significant adverse visual effects are identified in the LVIA from the OS marked panoramic summits of The Nebit and Ben Cleuch, but significant effects on routes from which these hills are accessed are not acknowledged in the LVIA. This would include **significant effects** from Ben Ever and the route from here to Ben Cleuch (in either direction). Several turbines would also be visible from The Law and the approaches to its summit also with significant visual effects. Other wind energy developments in the Ochils would be screened from these routes until close to the summit of Ben Cleuch, and therefore significant cumulative effects would not occur except locally when close to the Ben Cleuch summit."*
- 4.38 Committee should note that these routes do not follow Core Paths or Rights of Way, other than 'permissive' type and in accordance with the right to roam under the Land Reform (Scotland) Act 2003. Elsewhere, although commentary is provided relating to impacts on the recreational path network, none are found to be as significant as those occurring in the Ochil Hills.

4.39 Visitor Location: Gartmorn Dam (Country Park): Although not included for assessment within the LVIA, the Council's consultancy has undertaken its own assessment of potential visual impacts relating to this recreational asset, which is situated within the Forest Special Landscape Area (SLA). It finds that up to 4 turbine blades and 1 hub would be visible at a distance of 7.5km. It considers that moving turbine blades would be very easily noticeable and a distracting element of views to the escarpment otherwise unaffected by obvious development, with visual impacts of 'Low' magnitude and **'Moderate' significant adverse** effects to receptors of 'Medium/ High' sensitivity, albeit experienced locally within the Country Park.

4.40 Its conclusions regarding **visual effects** are as follows:

"We consider that the LVIA has underestimated the visual impact of the proposed development, in particular the magnitude of visual change that would be experienced from the proposals being seen above the skyline of the Ochil hills. This has resulted in receptors subject to potentially significant effects being scoped out of the assessment.

We consider that there would be significant adverse effects from various locations with more open views to the proposed development. Within settlements, views would tend to be screened by built development, however the Ochil hills tend to come in and out of view, for example seen along streets or from open spaces, from where significant effects may be experienced.

The LVIA has also omitted to assess effects from routes within the Ochil hills which form popular walking circuits, for example connecting The Nebit, Ben Ever, Ben Cleuch and The Law, from where significant adverse effects would be experienced."

4.41 Designated Landscapes: The Report turns to impacts relating to the Ochil Hills Special Landscape Area (SLA) – a local landscape designation. In respect of this landscape area, it advises that the proposed development would give rise to adverse impacts on the most important Special Quality of this designated area. Paragraph 2.61 best explains this:

*"While not disagreeing with much of this assessment as far as it goes, we consider that it misses effects to the most important SQ of the SLA, which is to 'the rising steep hill slopes above the Hillfoot settlements' above which turbines of the proposed development would be seen. The SLA citation describes how the Ochils are a 'striking landscape feature in the landscape of Central Scotland', the scarp slope an 'especially important local and regional feature' with the hills having a high wildness value compared to adjacent areas of the Central Belt. We consider that the presence of the proposed development in views towards the Ochils escarpment would **significantly affect this special quality** which is fundamental to the designation."*

4.42 Paragraphs 2.62 and 2.63 explain how cumulative impacts appreciable from within the SLA, in particular from named summits that currently have no turbine visibility, would be likely to change how character of the landscape is perceived, through introduction of the Windburn turbines. Paragraph 2.63 states:

*“Taking account of the above described effects, we consider that **the integrity of the SLA would be compromised**, noting that, should the development be consented and applying the principles of GLVIA3, the susceptibility of the SLA to wind energy would be reduced, which is likely to increase pressure for further development.”*

- 4.43 The Report/review describes, for each viewpoint, likely effects arising from the development. These respond to the LVIA on the basis that the range of viewpoints included provide an acceptable basis upon which to consider landscape and visual impacts. Although full reference to the assessments made are available in said advice (Appendix 1), the Committee is asked to consider the following case officer’s non-technical commentary:

Additional Viewpoint Commentary:

Viewpoint 1: Ben Cleuch:

- 4.44 The first viewpoint is situated at the well-known Ben Cleuch summit, a destination summit with largely 360 degree outward views. The summit is 721m Above Ordnance Datum (AOD), the highest point in the Ochil Hills, and not only represents the viewpoint, but also the locality around the southern peaks of the Ochils range. Views northwards from this area look towards the Southern Highlands with Ben Lomond, Ben Ledi and Ben Vorlich especially prominent. Views southwards are over the Forth Valley region and provide almost a coast-to-coast view.
- 4.45 The entire turbine group would be situated approximately 2km to the north-west of this point and all of the Windburn turbines would be visible, including the hubs of 9 turbines and a substantial part of the towers of 7 of them, and some of the ground level tracks. From this point a number of other windfarms feature prominently, with the Burnfoot Hill/Rhodders cluster being approximately 1.5km away at its nearest point to the north and the Braes of Doune Windfarm visible beyond the application site to the north-west, some 20km away. The operational Green Knowes Windfarm is clearly visible to the north-east at approximately 9km distance.
- 4.46 Views northwards towards the Southern Highlands would significantly change because the Windburn turbine cluster would become the most prominent and eye-catching component of the local landscape. It would also bring wind farm development closer to this point and result in a greater sense of turbine presence. The turbine hubs tend to be back-clothed by other topography in the Ochils group and do not project openly onto the more distant Southern Highlands mountains mentioned previously. To some extent, they are visually contained within the topography of the Ochil Hills.
- 4.47 Notwithstanding the height difference between existing turbines at 102m to tip and the proposed Windburn turbines at 149.9m to tip, their appearance is comparable to that of the Rhodders/Burnfoot Hill turbines – from here, the scale differential does not register majorly.

Viewpoint 2: The Nebit:

- 4.48 Another well known, visited summit within the southern edge of the Ochils on top of the main southern scarp, The Nebit (449m AOD) looks north through/towards the proposed site of the turbines through the summit of

Craighorn (583m AOD), with Ben Ever (622m AOD) just to the east and in the right of the picture. Rounded, smooth, tree-free slopes characterise the views northwards, north-eastwards, westwards and eastwards and no wind turbines are currently visible from here. The Nebit is also identified as a destination viewpoint for recreational users, for example on Ordnance Survey Explorer mapping @ 1:25000 scale. Views southwards are again over the Forth Valley region and are extensive.

- 4.49 Introduction of the Windburn turbines would mean that Craighorn would be backdropped by the rotating blades of T1, T2, T3, T5 and T6, albeit that T6 would be a small tip-section. The turbines would be the only moving structures visible and would introduce a dynamic element to the scene. No hubs would be visible.

Viewpoint 3: Innerdownie:

- 4.50 This viewpoint is within Perth & Kinross Council's administrative area.

Viewpoint 4: Dumyat:

- 4.51 This viewpoint is within Stirling Council's administrative area.

Viewpoint 5: B9140 near Collyland:

- 4.52 This section of the busy road connecting Tullibody/Glenochil to Fishcross represents a lowland part of the County. From here, visibility to the Ochil Hills is open and includes the settlement of Alva, in the foreground fronting the hills. The iconic southern face/scarp of the West Ochils is highly appreciable from this locality with Dumyat, Colsnaur Hill, The Nebit and Wood Hill dominating. From here, views of the Ochil Hills (in the vicinity of the wind farm application site) are not influenced by large scale above-ground infrastructure such as pylons and transmission lines.

- 4.53 The nearest turbine would be T1 at approximately 5.5km, being the southernmost turbine in the group. The rotating blades of T1 and T6 would theoretically be visible behind Craighorn. The hub and rotor area of T2 would be visible above the skyline between Big Torry and Craighorn, up and to the left of Alva Glen. Although only a small proportion of the wind farm would be visible from here, its potential significance is increased because there are no other turbines visible from this area and also because of how conspicuous one hub seems, when none others are visible.

Viewpoint 6: Gleneagles Hotel:

- 4.54 This viewpoint is within Perth & Kinross Council's administrative area.

Viewpoint 7: Braco:

- 4.55 This viewpoint is within Perth & Kinross Council's administrative area.

Viewpoint 8: Alloa Tower:

- 4.56 Alloa Tower is a heritage/visitor attraction with access to the rooftop platform. Views northwards towards the Ochil Hills are wide and open, albeit heavily foregrounded by the built/settled locale of Alloa, which occupies much of the lower part of the view. The sculpted hills of Big Torry/Craig Leith, Craighorn, The Nebit, Wood Hill and The Law are all prominent on the front scarp/slope. Ben Cleuch is visible beyond the scarp summits.

- 4.57 Presently, no wind turbines or associated infrastructure are visible on the Ochils from here. The skyline is devoid of man-made structures and fully appreciable. The nearest turbine, T1, would be 8.3km from this location. The hubs of T1, T2 and T6 would sit above the skyline along with the rotating blades of T3 and T4, and a sweeping tip of T5.
- 4.58 The southern face of the West Ochils is a cherished and iconic landscape feature. Its hills are intimately located, shapely and provide a valued backcloth to Clackmannanshire. Any interruption to the skyline would be noticeable even from this distance, and with moving blades the juxtaposition between the landscape and the turbines would be a fundamental change, especially as no views from this part of Clackmannanshire, whether at the top of a tower or at ground level, include any parts of any turbines; whereas, several of the Windburn turbines would feature prominently on top of the sensitive skyline.
- 4.59 It should be noted that the photomontages from Viewpoint 8 do not show the worst-case scenario generally required by NatureScot LVIA guidelines. In actuality, the turbines would, in some climatic conditions, appear more sharply in contrast with the landscape and the sky; conversely, in some climatic conditions the turbines would recede from view as light and colours change.

Viewpoint 9: Clackmannan Tower:

- 4.60 Clackmannan Tower, along with Alloa Tower, Sauchie Tower, Campbell Castle and Menstrie Castle, make up the Clackmannanshire Tower Trail. It is situated approximately 1.7km east south-east of Alloa Tower and also offers wide open views to the site and the Ochil Hills from west to east, and again none of the existing turbines at Burnfoot Hill and Rhodders are visible. The photography for this Viewpoint was taken at ground level. Clackmannan Tower does not have the same level of access to the inside of the building as Alloa Tower.
- 4.61 From this locality the Ochil Hills are less affected by the built/settled elements of Alloa, partially because the view is foregrounded by the mature policy woods beside the Black Devon (Back Wood). Again, several of the turbines are shown to sit prominently on the skyline with the hubs of T2 and T6 breaching it and the rotating blades of T1 and T3, and tips of T4 and T5 adding to the moving dynamic against the still form of the hills.
- 4.62 The visualisations further evidence adverse impacts in the setting of the Ochils that would occur through the introduction of the turbines as they would give rise to effects not currently occurring. Even at 9km it is likely that the visible turbines would sometimes appear more starkly and in contrast to the receiving landscape.

Viewpoint 10: B827 NW of Braco:

- 4.63 This viewpoint is within Perth & Kinross Council's administrative area.

Viewpoint 11: Cowie Road at Easter Greenyards:

- 4.64 This viewpoint is within Stirling Council's administrative area.

Viewpoint 12: A9 SW of Perth:

- 4.65 This viewpoint is within Perth & Kinross Council's administrative area.

- Viewpoint 13: Gask Ridge:*
- 4.66 This viewpoint is within Perth & Kinross Council's administrative area.
- Viewpoint 14: Bannockburn Memorial:*
- 4.67 This viewpoint is within Stirling Council's administrative area.
- Viewpoint 15: Clackmannanshire Bridge:*
- 4.68 This viewpoint is within Falkirk Council's administrative area.
- Viewpoint 16: Chartershall Road:*
- 4.69 This viewpoint is within Stirling Council's administrative area.
- Viewpoint 17: Blairdrummond Castle:*
- 4.70 This viewpoint is within Stirling Council's administrative area.
- Viewpoint 18: Knock of Crieff:*
- 4.71 This viewpoint is within Perth & Kinross Council's administrative area.
- Viewpoint 19: A811 near Gargunnock:*
- 4.72 This viewpoint is within Stirling Council's administrative area.
- Viewpoint 20: Falkirk Wheel:*
- 4.73 This viewpoint is within Falkirk Council's administrative area.
- Ben Ever: Additional Viewpoint (Wireline only – Figure 7.32)*
- 4.74 This summit is often visited as a sub-destination for recreational users walking in the Ochils, in particular because it connects lower summits (The Nebit, for example) to the highest summit of Ben Cleuch. Established pathways cross the summit although none are Core Paths or Rights of Way. The nearest turbine would be 1.3km from this point. Twelve of the thirteen turbines would be prominent in, and dominant of views northwards. Although no turbines would vertically breach the long range horizon, at least six hubs would project above the nearer horizons in the Ochils locale.
- 4.75 Views from Ben Ever northwards capture the Southern Highlands. Existing wind farms (turbines) in the Ochils are not visible here, only becoming visible some 150-200m from the summit of Ben Cleuch. Whereas Ben Ever is at 622m AoD, the summit of Ben Buck at 679m effectively screens turbines at Rhodders and Burnfoot Hill.
- Sauchie Church Grove: Additional Viewpoint (Wireline only – Figure 7.36)*
- 4.76 This viewpoint represents the type of view expected intermittently as people move in Sauchie between screening buildings and vegetation. Similar intermittent views can be expected in Clackmannan, Alloa and rural locations in between. The iconic scarp skyline is unmistakable above the carselands. The nearest turbine would be a little under 7km from here. At least two hubs and three sweeping blades would be visible above the skyline including T1 which would appear close to the summit of Craighorn.
- 4.77 From this locality it is evident that no other wind turbines are visible above the Ochils skyline. The introduction of the Windburn turbines would therefore present conspicuously, even at this distance.

Landscape and Visual Impacts – Conclusions:

- 4.78 The external landscape consultants' report indicates that impacts on landscape character would diminish the special qualities of the Special Landscape Area; and that visual impacts relating to the locality of Clackmannanshire, including its upland areas within the Ochil Hills, are significantly adverse and are beyond a reasonable definition of 'localised'. Officers fully agree with this assessment of the development principle.
- 4.79 Officers also acknowledge that the report indicates measures to mitigate landscape and visual impacts that could eliminate many of the adverse effects. Removal of up to 6 turbines from the scheme, all within Clackmannanshire, would have the potential to reduce adverse impacts to an acceptable level in a Clackmannanshire context, albeit residual impacts would still be adverse.
- 4.80 NPF4 and the Onshore Wind Policy Statement identify that adverse effects of proposed wind farms, although important considerations, should not preclude support for reasonable developments if effects arising can be accepted. However, the policy and statement do not override the prerogative of planning authorities to formulate its own views on the acceptability, or otherwise, of proposals. Even in the light of the Government's drive for implementation of more sustainable energy developments, it is critical for all opportunities to minimise environmental effects to be invoked to ensure the premise of 'the right development in the right place' is maintained.
- 4.81 In the case of the Ochil Hills, most people living in and around Clackmannanshire will be familiar with, and have some form of connection to, the landscape that would be affected by the development. Mitigation is an essential element of the process during the consideration of all large-scale wind energy developments, primarily because adverse effects are inevitable; but also, because when adverse impacts are highly likely to occur, all efforts should be taken to limit them. Mitigation should heed credible advice from specialist consultees during the planning process 'post-submission', and not solely depend on embedded mitigation introduced by applicants in the light of EIA at pre-submission stage.
- 4.82 At this time, potential acceptable mitigation has not been proffered; therefore the range of adverse landscape and visual impacts that would arise may not be deemed acceptable in terms of protecting public amenity interests involving the natural environment.
- 4.83 As identified in the Ironside Farrar report, the proposals are highly unlikely to accord with identified Development Plan policies (including adopted Supplementary Guidance) relating to energy development in the light of the significant adverse landscape and visual impacts. Whether said impacts are tolerable in the overall planning balance, having regard to the Development Plan as a whole, and to the Climate Emergency, will be explored in the overall conclusion to this report.

Impacts on Local Communities:

- 4.84 This section considers potential impacts on residential (or other property occupier) amenity impacts. The main subjects are noise, shadow flicker and visual impacts on residential amenity.

Noise (Construction):

- 4.85 Noise impacts can occur during construction, through the movement and operation of machinery including rock blasting equipment, if stone is to be excavated and processed on site for use in track construction; and during operation, as turbines give rise to swooshing and occasional ‘thumping’ noises as they interact with wind. Mechanical noise can be emitted from the nacelle (hub) – the part of the turbine encasing the ‘gearbox’ of the turbine. Noise impacts can be cumulative with other existing developments, including other nearby wind farms.
- 4.86 Chapter 14 of the EIA includes a section on noise, starting at Paragraph 14.55. It is likely that construction noise would be audible in Clackmannanshire. However, taking into consideration that the nearest settlement is Alva at 2.9km from the site, it is unlikely that noise emanating from any of the activities would potentially be at an unacceptable level. The nearest borrow pit (area for stone excavation) is approximately 4km from Alva and nearest temporary construction compounds further away at around 4.3km.
- 4.87 Technical Appendix 3.1 Outline Construction Environmental Management Plan (oCEMP) at 3.5 describes the intention to set up a community liaison strategy to ensure communities are kept aware of activity, and have access to relevant personnel if they have queries or complaints.
- 4.88 At Section 5.6, the oCEMP provides the following advice on noise management during construction: *“The sources of construction noise are temporary and vary both in location and their duration as the different elements of the proposed development are constructed, and arise primarily through the operation of large items of plant and equipment such as bulldozers, diesel generators, vibration plates, concrete mixer trucks, rollers etc. Noise also arises due to the temporary increase in construction traffic near the site. The level of noise varies depending on the different elements of the proposed development being constructed. BS 5228-1:2009 ‘Noise control on construction and open sites; Part 1 – Noise’ is identified as being suitable for the purpose of giving guidance on appropriate methods for minimising noise from construction activities. For all activities, measures shall be taken to reduce noise levels with due regard to practicality and cost as per the concept of ‘best practicable means’ as defined in Section 72 of the Control of Pollution Act 1974.”*

Noise (Operational):

- 4.89 The assessment of noise from wind turbines has, for nearly 3 decades, been undertaken in the light of ETSU-R-97 ‘*The Assessment and Rating of Noise from Windfarms*’. The guidance was written by a Noise Working Group including developers, noise consultants and environmental health officers, set up in 1995 by the Department of Trade and Industry through ETSU (the Energy Technology Support Unit). It is under review at the time of writing, but

until ETSU-R-97 is superseded, it remains the primary reference document when considering acceptability of operational noise effects from the turbines.

- 4.90 The document sets out acceptable noise limits for dwellings in terms of dB(A), which relates to decibels, describing more stringent limits at night-time, and an increased upper noise limit for properties that are financially involved with the project. These are described in detail in Paragraphs 14.72 to 14.80 of EIA Chapter 14 'Other Issues'.
- 4.91 Even taking into account cumulative noise from proposed turbines and those within Rhodders and Burnfoot Hill Windfarms, the upper noise levels from Windburn Windfarm would be well under recommended limits for daytime and night-time noise emanations. For example, a 35dB lower daytime limit would be applicable to properties in Alva, but cumulative turbine noise is predicted not to exceed 27dB.

Shadow Flicker:

- 4.92 This may occur under certain combinations of geographical position and time of day, when the sun passes behind the rotors of an operating wind turbine and casts a shadow over neighbouring properties. As the blades rotate, the shadow flicks on and off, an effect known as shadow flicker. The effect can only occur inside buildings, where the flicker appears through a window opening.
- 4.93 Effects tend to be negligible and therefore not of concern where properties are more than 10 times the length of the rotor diameter (blade span) away. In respect of the Windburn turbines, as set out in EIA Chapter 14 the 10 x rotor diameter distance would be 1.43km, whereas the nearest property is 2.7km away (Carim Lodge – within Perth & Kinross). Shadow flicker would not occur at properties within Clackmannanshire, therefore shadow flicker is not an issue of concern.

Residential Visual Amenity Impacts:

- 4.94 Many proposed wind farms will have significant impacts on residential amenity. Impacts considered tend to relate to how people use their private dwellings, for example:
- What do the turbines look like from primary rooms within the dwelling, including upstairs rooms?
 - How does the presence of turbines affect outside areas within the curtilage of the dwelling?
 - How would the presence of turbines affect approaches to and from dwellings?
 - Would the introduction of the turbines, combined with presence of existing turbines, give rise to significant cumulative effects?
- 4.95 Consideration of this type of issue can extend to other premises including hostels, outdoor centres, community buildings and so on.
- 4.96 It is rare that any wind farm proposal would not give rise to any significant impacts on the private amenity of occupiers. Normally, a Residential Visual Amenity Assessment (RVAA) would be included as part of the EIA submission. The RVAA would normally assess properties within a maximum

area of 3km of the turbines, although this distance is more often 2.5km, and occasionally 2km. Assessment would first look at which properties are potentially affected based on mapped information showing theoretical visibility. Thereafter, properties would be scoped out of more detailed appraisal if, in reality, other factors clearly identify that impacts would be limited such as orientation, vegetation, presence of other structures and what proportion of the turbines would be visible. The remaining properties where clear residential visual amenity impacts would occur are appraised in detail to test whether potential visual impacts can be accepted.

- 4.97 The nearest properties within Clackmannanshire to the wind farm are in Alva. The location of the proposed wind farm in the middle of the Ochil Hills in an uninhabited locally remote land area means that potential residential visual amenity impacts are negligible and no individual properties are at risk of being close to the turbines, or any other element of the development. As a result, detailed consideration of such impacts have been scoped out (for example, see EIA Chapter 7, paragraph 7.9) and no RVAA has been produced. In this instance, officers are content to accept that an RVAA is not required, specifically with regard to Clackmannanshire interests.

Impacts on archaeology and cultural heritage:

- 4.98 Direct and indirect heritage impacts have been examined in detail within Chapter 11 of the EIA. These provide coverage to designated and non-designated heritage assets, including archaeology.

Designated Heritage Assets:

- 4.99 Figure 11.1 is a map showing all designated heritage assets including listed buildings and scheduled monuments. There are no such assets within 3km, in terms of the Clackmannanshire area. However, three specific assets within the County have been identified for assessment in terms of potential impacts of development on the asset. Largely, this is because of potential intervisibility between the assets and the turbines. They are:

- (i) Clackmannan Tower (Scheduled Monument – approx. 9km south of T1)
- (ii) Alloa Tower (Category A Listed Building – approx. 8.3km south of T1)
- (iii) Sauchie Tower, tower and house (Scheduled Monument – approx. 5.3km south of T1)

- 4.100 In relation to all 3 assets, the assessment concludes that setting impacts are of ‘nil significance’, mainly because the visual relationship between the turbines and the assets, having regard to (i) distance (ii) the level of visibility of the turbines from and pertaining to the assets and (iii) the purpose of the asset in terms of its intended foci, is such that there would be no magnitude of impact.

- 4.101 Wireline diagrams showing theoretical visibility (‘bare earth’) are present in Figure 11.3c (Clackmannan Tower), 11.3d (Alloa Tower) and 11.3f (Sauchie Tower).

Non-Designated Heritage Assets:

- 4.102 Figure 11.2 is a map identifying non-designated heritage assets within the proposed wind farm site and within 1km of the turbines. Within the

Clackmannanshire part of the site (including locations on the site boundary), there appears only to be one asset, close to the eastern boundary. A further asset just outside the application boundary is situated next to the County border with Perth and Kinross. A further asset is situated around 300m east and north-east of the site boundary midway between T5 and T11, and two further items are situated a little over 1km to the south-east and south-west of the nearest turbines, but outwith the application site.

- 4.103 A group of non-designated recorded items is located 2-3km north-east of the nearest turbine, centred around the Upper Glendevon Reservoir. These are in Perth and Kinross.
- 4.104 The Regional Archaeologist as specialist consultee provided a response in respect of the proposal, fundamentally advising that the EIA Chapter (11) relating to this subject area is competent, and that the conclusions are agreed, thereby resulting in no objection from an archaeological point of view.
- 4.105 It can be noted that Historic Environment Scotland (HES) indicated to Scottish Ministers on 22 August 2025 that the development proposal does not raise issues of national significance sufficient to warrant an objection for its historic environment interests.
- 4.106 In the absence of any significant concerns relating to potential impacts on the Heritage/archaeological environment, the application is considered to be acceptable from a heritage point of view, primarily in the light of LDP Policy EA20 and NPF4 Policy 7. Appropriate / relevant conditions relating to matters mentioned above would be proposed, as set out in the Council Archaeologist's response.

Roads, Traffic and Access:

Road Safety:

- 4.107 The application/EIA confirms that the proposed windfarm would not involve any access from within Clackmannanshire, and none of the delivery routes for abnormal loads or construction traffic routes are within the County.
- 4.108 On this basis, the Council's Roads and Transportation Manager, as specialist internal consultee, has straightforwardly advised that there is no objection from a road safety point of view. Officers are content to accept this position.
- 4.109 For information, the Committee is asked to note that Transport Scotland, as consultee to Scottish Ministers, has indicated that it does not object to the development in terms of environmental impacts on the trunk road network.

Access:

- 4.110 Presently, the entire site area within Clackmannanshire is subject to public access under The Land Reform (Scotland) Act 2003. There are no Core Paths within the site in Clackmannanshire, and no Recorded Rights of Way. However, the West Ochils are criss-crossed with established permissive paths enabling summit-to-summit access for walkers, runners and in certain areas cyclists (mountain bikes).

- 4.111 The Council's Sustainability Service comments regarding the site access crossing a Core Path and potential related impacts. This Core Path is entirely within Perth and Kinross, therefore potential impacts relating to it are not within this Council's sphere of interest and must be explored by the relevant planning authority in advance of its response to Ministers.
- 4.112 As part of the development 'offer', an existing footpath to Alva (marked on Figure 13.4a) which appears to terminate north of Ben Ever, would be extended via a new walking path that would link to the eastern end of the track affording access to proposed turbine T1. The entire new section of path would be within Clackmannanshire. The purpose of this link appears to be to connect to the new track network that would be formed within the wind farm.
- 4.113 In terms of the physical impact of the wind farm on access via the path network in Clackmannanshire's part of the West Ochils, it is likely that people would be able to continue to move around much as they do now. The wind farm area, although theoretically accessible, is less of a walking, running and cycling resource than many of the prominent hills. The terrain is less easy to traverse because it is wetter and more peaty/boggy.
- 4.114 This means that people would continue mainly to be able to explore the hill peak areas relating to the likes of Ben Cleuch, Ben Ever, Craighorn, Bengengie, Blairdenon and Ben Buck from Clackmannanshire without obstruction. However, the experience of users would change notably with the introduction of the turbines, in particular where they become visible around Craighorn on the journey from Ben Ever to Ben Cleuch, one of the more obvious summit-to-summit routes. Whereas the existing groups of turbines sit relatively well contained within lower land areas and only begin to be visible in the last 150-200m when moving from Ben Ever to Ben Cleuch, most of the Windburn turbines would be visible and some would be prominent for that stretch of the route.
- 4.115 The Zone of Theoretical Visibility maps show that along the stretch from Ben Ever to Ben Cleuch, 8-13 hubs (11-13 tips) would be visible. This is reflected to some extent in the photomontages associated with Viewpoint 1 Ben Cleuch, which demonstrate that at least 9 of the turbine hubs would be visible above the near horizon, with a substantial upper section of the turbine columns being visible for T1, T2, T3, T4, T6, T7 and T9. This would undoubtedly give rise to significant visual impacts on users of the West Ochils and path networks within, in terms of their experience of the place, and activity.
- 4.116 This tends to identify that the development would not accord with some of the more subject specific objectives of the Development Plan, in particular NPF4 Policy 11(e)(ii) and 11(e)(iii); and LDP Policies SC14, SC15 (and associated Supplementary Guidance), EA4 and SC23.

Flood Risk:

- 4.117 The River Devon flows north eastwards through the eastern extent of the site. Several tributaries of the river rise within the site, including Alva Burn sub catchment which drains the southern extent of the site. All of the proposed turbines are located within the River Devon surface water catchment. Surface

gradients to the south of the site are steep, and as a consequence of the shallow soils and low bulk permeability of the superficial geology, a rapid response to rainfall is likely to occur in the Alva Burn sub catchment.

- 4.118 EIA Chapter 10 is entitled 'Hydrology, Hydrogeology and Geology'. Paragraph 10.13 identifies increased flood risk to areas downstream of the site during construction through increased surface runoff as one of several potential impacts (decommissioning impacts would be similar albeit less than construction effects). Paragraph 10.14 identifies increased runoff rates and flood risk, resulting from increases in areas of tracks and hard standing at turbines, as one of several potential impacts during operation.
- 4.119 Paragraph 10.15 advises that the provision of a detailed Flood Risk Assessment has been 'scoped out' (not required), on the basis that published mapping confirms that most of the site is not located in an area identified as being at flood risk. It goes on to advise that a screening of potential flooding sources (fluvial, pluvial, coastal, groundwater, infrastructure etc.) is presented in Chapter 10; and measures that would be used to manage flood risk and control the rate and quality of runoff will be specified in the final CEMP at the detailed design stage of the proposed development.
- 4.120 Table 10-6 'Flood Risk Screening' confirms that there is potential flood risk to the site from river and surface water; and that there is a low risk of flooding from groundwater sources. Paragraph 10.103 advises that the proposed development has undergone multiple design iterations in response to the constraints identified as part of the baseline studies, including areas of potential flooding, so as to avoid and/or minimise potential effects on receptors where possible.
- 4.121 Paragraphs 10.167 to 10.171 in Chapter 10 are specific to flood risk during construction (and therefore decommissioning), advising as follows:
- Construction of hardstanding including the substation compound, BESS, construction compound and turbine bases would create impermeable surface areas which could increase runoff rates and volumes.
 - It is proposed that any rainwater and groundwater ingress which collects in the excavations during construction would be stored and attenuated prior to controlled discharge to ground or surface water network adjacent to the excavation.
 - Attenuation of runoff generated within the proposed excavations would allow settlement of suspended solids within the runoff prior to discharge in accordance with 'Site control' component of the SuDS 'management train'.
 - The magnitude of the increase in impermeable area is not sufficient to have a measurable effect on groundwater levels, as the extent of the impermeable area is insignificant compared to the extent of the underlying geology and groundwater.
 - Given the recorded instances of flooding recorded previously downstream of the site, flood risk is considered a receptor of high sensitivity. With the deployment of SuDS measures, the magnitude of impact is mitigated and considered negligible. The significance of effect is therefore assessed as negligible and not significant.

4.122 Paragraphs 10.196 to 10.199 in Chapter 10 are specific to flood risk during operation, advising as follows:

- The risk of an effect on fluvial flood risk arises as a result of a potential restriction of flow at a permanent water crossing following intense rainfall and an increase in runoff rates and flood risk resulting from the introduction of permanent hardstanding areas.
- In accordance with good practice routine inspection and clearing of the watercourse crossings at the proposed development will be undertaken, reducing the likelihood of a blockage occurring.
- The SuDS drainage measures deployed across the proposed development during construction will be maintained and used to locally collect, treat and discharge incident rainfall runoff. These measures will also attenuate the rate of runoff and mitigate the potential for flood risk to be increased offsite.
- The magnitude of impact is therefore assessed as negligible, and thus the significance of effect is assessed as negligible and not significant.

4.123 The Council's Roads and Transportation Manager, as Lead Local Flood Authority and specialist advisor to the Planning Service, has not identified potential flood risk as a concern in the consultation response. The finalised CEMP is an appropriate document within which to identify any flood risk mitigation and management. For information (noting SEPA is a consultee to Scottish Ministers, not to the Council), SEPA has not identified potential flood risk as a specific concern, although has recommended conditions including a condition requiring production of a detailed CEMP covering flood risk.

4.124 In the absence of any significant concerns relating to flood risk impacts, the application is considered to be acceptable in this context, primarily in the light of LDP Policy EA9 and NPF4 Policy 22.

OVERALL CONCLUSIONS:

4.125 Clackmannanshire Council and Perth & Kinross Council have been consulted on this proposal by the Scottish Ministers, as the latter is the determining authority for applications made under Section 36 of the Electricity Act 1989, rather than the Councils as local planning authorities. The assessment of the proposal in terms of its impacts on Clackmannanshire, as noted above, has highlighted harmful landscape and visual effects which are considered to be greater than localised, are unacceptable and would give rise to impacts that conflict overall with the adopted Development Plan and Council guidance.

4.126 No other specific areas / topics have been found to promote unacceptable environmental impacts.

4.127 Mitigation introduced to reduce daytime environmental landscape and visual impacts has, to date, been limited to matters identified during preparation of the EIA. No post-submission mitigation has been undertaken to minimise or reduce daytime impacts, especially those relating to landscape and visual effects, notwithstanding consideration by the Council as a specialist consultee, and provision of advice to the applicant regarding potential

mitigation as indicated in its external landscape consultancy review (November 2025).

- 4.128 The Council's Climate Change Strategy (2024) includes agreement on Page 11 to *"Develop a comprehensive Climate Change Strategy within the next 12 months which will deliver a framework to ensure that all strategic decisions, budgets and approaches to planning decisions are in line with a shift to net zero greenhouse gas emissions by 2045."* The 'Roadmap to achieve Net Zero for Council's own operations' goes further – aiming for Net Zero at 2040.
- 4.129 On Page 12 under 'The Role of Clackmannanshire Council' it states: *"Rural Councils such as Clackmannanshire are particularly well placed to contribute to net zero targets through land for onshore renewable energy..."*
- 4.130 A multi-themed Climate Emergency Action Plan has been developed as part of the Climate Change Strategy, focussing on Clackmannanshire Council's activity and operations, and extending to its role as decision maker on planning applications. The commitment to achieving Net Zero is clear, and unequivocally must be relatable in planning recommendations made in respect of renewable energy projects.
- 4.131 NPF4 and the Onshore Wind Policy Statement significantly update the national policy picture to one which anticipates greater environmental impacts will be acceptable in relation to the delivery of renewable energy development in the light of Climate and Nature Crises. Paragraph 3.6.1 states: *"Meeting our climate targets will require a rapid transformation across all sectors of our economy and society. This means ensuring the right development happens in the right place. Meeting the ambition of a minimum installed capacity of 20 GW of onshore wind in Scotland by 2030 will require taller and more efficient turbines. This will change the landscape."*
- 4.132 The Windburn Wind Farm renewable energy development would give rise to significant benefits in terms of energy provision, although it is a modest scheme by comparison to many other Section 36 schemes currently under consideration in Scotland, at 13 turbines & 65MW, albeit with supplementary energy storage also proposed (in Perth & Kinross); it would simultaneously promote significant adverse landscape and visual impacts. It remains, even in the light of current Government policy that has increased the potential for more schemes to be supported, imperative to ensure that the right development in the right place is delivered – as reflected in the Onshore Wind Policy Statement at paragraph 3.2.3: *"Our land contributes to climate change mitigation in many ways. Scotland has a long and positive history of harnessing renewable energy and our capacity to generate it will need to be increased to meet our net zero targets. Our energy will continue to be provided by a wide and diverse range of renewable technologies, including onshore wind. We will need to continue to develop wind farms, in the right places, and also look to the extension and replacement of existing sites. As set out in our Onshore Wind Policy Statement, in order to achieve this developers and communities will need to work together to ensure that projects strike the right balance between environmental impacts, local support, benefit, and – where possible – economic benefits for communities, for example through community ownership or other means..."*

- 4.133 In this case, although the location may be acceptable to support additional energy development in principle, taking into consideration the implemented wind energy baseline, the proposed development is overwhelmingly incompatible with its receiving landscape and visual environs due to its design, location, layout / composition, scale, and related environmental impacts, meaning that it does not constitute the right development in the right place. The scheme has not been the subject of any mitigation relating to landscape and visual impacts during the consultation period.
- 4.134 It is therefore recommended that Clackmannanshire Council indicates that it objects to the proposal, in the light of unacceptable landscape and visual impacts that would arise.
- 4.135 Should Scottish Ministers be minded to grant consent and deemed planning permission for this development, it is normal practice for them to liaise further with officers to agree the final wording of conditions to be attached to any deemed planning permission; albeit that many relevant subject are now covered in the list of Standard Conditions first published in February 2025 (last update November 2025). It is therefore requested that delegated authority is provided to officers to agree the final wording of conditions with ECU officers, including those suggested by external consultees.
- 4.136 At this time, it is expected that conditions recommended to Scottish Ministers, including those set out by other consultees, would potentially provide coverage of the following matters:
- a) Conformity with application / EIA
 - b) Limitation of operational period
 - c) Decommissioning, restoration and aftercare
 - d) Financial guarantee / bond
 - e) Removal / restoration where turbines become redundant
 - f) Construction and environmental management (including the provision of an Ecological Clerk of Works)
 - g) Peat & carbon-rich soils management (plan) (SEPA / NatureScot)
 - h) Details of borrow pit working
 - j) Pollution control (noise, vibration)
 - k) Private Water Supplies Management / Protection
 - l) Engagement of planning monitoring officer
 - m) Limitation of micro-siting allowances
 - n) Finalised plan showing changes to layout through micro-siting
 - o) Details of actual turbines to be installed
 - p) No signage on turbines
 - q) Details of other development components to be approved
 - r) Heritage / archaeology – protection of assets & site investigation
 - s) Detailed forestry proposals (Forestry Scotland)
 - t) Traffic / transportation / road safety (Perth & Kinross Council)
 - u) Aviation safety (Ministry of Defence / Civil Aviation Authority)
 - v) Limitation of construction hours
 - w) Habitat Management & Ecology (Plan / Strategy)
 - x) Water Quality and Fish Monitoring Plan
 - y) Bird Protection Plan
 - z) Protected Species Protection Strategy
 - aa) Access Management Plan

5.0 Sustainability Implications

- 5.1 The development would provide a sustainable source of renewable energy that would contribute to Scotland's targets to achieve Net-Zero by 2045, and in so doing respond positively to the Climate Emergency. In principle, the generation of renewable electricity and associated storage through the delivery of wind energy projects is fully supported by national and local planning policy: The Development Plan.
- 5.2 The planning recommendation to Planning Committee identifies that the environmental harm arising from adverse environmental impacts of the development is of such significance that Clackmannanshire Council, as statutory consultee to Scottish Ministers, should object notwithstanding the Climate Emergency. This recommendation indicates that the proposed development is not fully compatible with the Council's sustainability objectives.

6.0 Resource Implications

- 6.1 Financial Details
- 6.2 The full financial implications of the recommendations are set out in the report. This includes a reference to full life cycle costs where appropriate. Yes ☐
- 6.3 Finance have been consulted and have agreed the financial implications as set out in the report. Yes ☐

7.0 Exempt Reports

- 7.1 Is this report exempt? Yes ☐ (please detail the reasons for exemption below) No ☒

8.0 Declarations

The recommendations contained within this report support or implement our Corporate Priorities and Council Policies.

(1) Our Priorities

Clackmannanshire will be attractive to businesses & people and ensure fair opportunities for all	X
Our families; children and young people will have the best possible start in life	X
Women and girls will be confident and aspirational, and achieve their full potential	X
Our communities will be resilient and empowered so that they can thrive and flourish	X

(2) Council Policies

Clackmannanshire Council Local Development Plan 2015
National Planning Framework 4

9.0 Impact Assessments

- 9.1 Have you attached the combined equalities impact assessment to ensure compliance with the public sector equality duty and fairer Scotland duty?
No ☒ X

- 9.2 If an impact assessment has not been undertaken you should explain why:

(i) Clackmannanshire Council is not the determining authority for this item (the Council is a statutory consultee); the application will be determined by Scottish ministers

(ii) Furthermore, having regard to the final paragraph of the Council's adopted document entitled "Procedure – Producing Council and Committee Reports", it states: *"When a new plan, policy or strategy is being presented or an existing plan, policy or strategy is being reviewed, a formal "Equality and Fairer Scotland Impact Assessment " may require to be undertaken."* This agenda item does not meet the criteria of a new plan, policy or strategy.

10.0 Legality

- 10.1 It has been confirmed that in adopting the recommendations contained in this report, the Council is acting within its legal powers. Yes ☐

11.0 Appendices

- 11.1 Please list any appendices attached to this report. If there are no appendices, please state "none".

Appendix 1: External Landscape Consultant Report (November 2025)

12.0 Background Papers

- 12.1 Have you used other documents to compile your report? (All documents must be kept available by the author for public inspection for four years from the date of meeting at which the report is considered)

Yes (please list the documents below) No ☒ X

13.0 List of Plans and Other Documents Forming Part of the Planning Application

- 13.1 The following list of documents and plans is included in the planning decision. This list will be presented to Scottish Ministers as part of the consultation response submitted by Clackmannanshire Council, further to consideration by the Planning Committee:

Doc Ref.	Description	Date Rec'd
Figure 1.1	Site Location	5 Jun 2025

Figure 1.2	Application Boundary	5 Jun 2025
Figure 3.1a-e	Site Layout	5 Jun 2025
Figure 3.2	Typical Turbine Elevation	5 Jun 2025
Figure 3.3	Indicative Turbine Foundations	5 Jun 2025
Figure 3.4	Indicative Track Detail	5 Jun 2025
Figure 3.5a-b	Indicative Crane Hardstanding	5 Jun 2025
Figure 3.6	Cable Trench Detail	5 Jun 2025
Figure 3.7	Indicative Substation Compound	5 Jun 2025
Figure 3.8	Substation Control Building (Elevs)	5 Jun 2025
Figure 3.9	Indicative Construction Compound	5 Jun 2025
Figure 12.2	Construction Vehicle Routes	16 Jun 2025
Figure 12.3	Abnormal Load Route	16 Jun 2025
Figure 13.4a-b	Potential Walking Path Link	16 Jun 2025
Tech Appx 10.2	Peat Management Plan	19 Jun 2025
Tech Appx 12.3	Construction Traffic Management Plan	17 Jun 2025
Tech Appx 8.4	Outline Habitat Management Plan	5 Jun 2025
Tech Appx 10.4	Schedule of Watercourse Crossings	17 Jun 2025
Tech Appx 10.5	Private Water Supply Risk Assmt	17 Jun 2025
Tech Appx 10.3	Borrow Pit Appraisal	17 Jun 2025
Tech Appx 10.6	GWDTE Assessment (Ecosystems)	17 Jun 2025
N/A	Design & Access Statement Parts 1-4	10 Jun 2025

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**Clackmannanshire
Council**

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Comhairle Siorrachd
Chlach Mhanann

WINDBURN S36 WIND FARM

Planning Application

ECU Ref ECU00004782

Audit of Landscape and Visual Impact Assessment

Prepared by:
IronsideFarrar Ltd

62252
November 2025
Final Issue 1.0

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Appendix 1: Review of Viewpoint Assessments

Appendix 2: Assessment of Effects to the Ochils SLA

Appendix 3: Images

Image 1: View from Gartmorn Dam

Image 2: View from NCN764

Image 3: View from NCN76

1. INTRODUCTION

- 1.1 The following review applies to the Landscape and Visual Impact Assessment (LVIA), and related studies, accompanying the S36 application for consent to construct and operate Windburn Wind Farm, located in the Ochil hills approximately 7km north of Alloa, with turbines straddling the boundary of Clackmannanshire and Perth & Kinross.
- 1.2 The proposed development comprises 13 turbines of 149.9m height to blade tip, 81m hub height, 8 of which are within Clackmannanshire. Other parts of the proposed development within Clackmannanshire include parts of the access track network and temporary construction compounds (EIAR Figure 3.1a). Access to the site would be taken from the A9 in Perth & Kinross.
- 1.3 Ironside Farrar have been commissioned by Clackmannanshire Council to undertake a review of the LVIA and provide advice on landscape and visual issues associated with the proposed development.
- 1.4 The Energy Consents Unit (ECU) reference is ECU00004782, and the documents are available at:
- <https://www.energyconsents.scot/ApplicationDetails.aspx?cr=ECU00004782>
- 1.5 The purpose of this report is to provide guidance to the Council on:
- the overall adequacy of the assessment and whether its conclusions are reasonable.
 - potential issues relating to the overall acceptability of the development from a landscape and visual point of view, and:
 - opportunities for reducing effects through design and mitigation measures, where considered necessary.
- 1.6 In Section 2, we provide a summary of the LVIA in terms of its methodology, baseline assumptions, scope and identified effects to landscape character, visual amenity, and to designated landscapes.
- 1.7 In Section 3 we provide our overall comments on the competence of the LVIA and its findings.
- 1.8 In Sections 4 to 6 we summarise the key landscape and visual issues relating to the acceptability of the proposed development, including its adherence to the Council's Supplementary Guidance 2 Onshore Wind Energy (Adopted 2015)¹

¹ <https://www.clacks.gov.uk/document/6851.pdf>

and planning policy, and identify any opportunities for modifications to the scheme or other mitigations/ compensatory measures which may be beneficial.

- 1.9 The scope of this review is limited to landscape and visual effects occurring within the boundaries of the Clackmannanshire Council area. Only the effects from the operational phase of the proposed development are considered.

2. REVIEW OF THE LANDSCAPE AND VISUAL IMPACT ASSESSMENT

- 2.1 This review is based on the information provided in EIAR Chapter 7 Landscape and Visual, and accompanying figures and visualisations, included in Volumes 3a to c of the EIAR. The LVIA Methodology is provided in Technical Appendix 7.1.
- 2.2 In this part of the report, we summarise and comment on the findings of the LVIA in terms of its methodology, the adequacy of its scope, and the reasonableness of its conclusions. Where disagreeing with its findings we provide reasons why and include our alternative assessments.
- 2.3 We comment selectively on the most relevant parts of the LVIA only.

LVIA Methodology (Technical Appendix 7.1)

- 2.4 The methodology as described in Technical Appendix 7.1 follows the principles of the 2013 *Guidelines for Landscape and Visual Impact Assessment*, 3rd Edition (LI/ IEMA), referred to hereafter as GLVIA3, and its 2024 notes and clarifications². Landscape and visual effects of 'moderate' or greater are assessed as significant in the LVIA.
- 2.5 The cumulative assessment (CLVIA) considers the 'additional' effect of the proposed development for two scenarios:
- Scenario 1: Existing and consented but unconstructed developments; and
 - Scenario 2: As scenario 1 plus development subject to planning application or appeal.
- 2.6 The cut-off for the cumulative assessment is stated as the 19th March 2025 (TA7.1.72) and cumulative schemes are shown on EIAR Figure 7.6. LVIA Table 7.7 provides cumulative wind farm developments and their status.
- 2.7 The closest schemes within 10km most relevant to the assessment of cumulative effects are the nearby Burnfoot wind turbine cluster comprising

²<https://www.landscapeinstitute.org/wp-content/uploads/2023/07/GLVIA3-Notes-and-Clarifications.pdf>

Burnfoot (102m) and its adjacent extensions Burnfoot North (102m), Burnfoot East (135m) and Rhodders (102m), and Green Knowes wind farm located 9km to the northeast.

- 2.8 While the described methodology complies with guidance, there are some aspects of the assessment where we consider that the methodology has not been correctly applied, in particular in the assessment of visual receptor sensitivity and for the assessment of cumulative visual effects. We comment more specifically on these matters in later sections of this report.

Embedded Mitigation (LVIA 7.86 Onwards)

- 2.9 Embedded mitigations and design objectives are referred to here, also set out in Chapter 2: Site Description and Design Mitigation.
- 2.10 Key landscape and visual objectives relevant to effects in Clackmannanshire are described in LVIA 7.87 as:
- Reducing the visibility and dominance of turbines above the Ochils escarpment.
 - Avoiding breaking the skyline in views north from Ben Cleuch (VP1).
- 2.11 We do not consider that these stated objectives go far enough to reduce significant effects to sensitive receptors in Clackmannanshire. We comment in detail on the siting and design of the proposed development, including embedded mitigations, later in this report.

Effects to Landscape Character (LVIA 7.97 Onwards)

- 2.12 The landscape of Clackmannanshire comprises four landscape character types as defined in the 2019 NatureScot landscape character assessment for Scotland:
- 149 *Lowland Hills – Central LCT*: the ‘host’ landscape of the Ochil hills.
 - 153 *Carselands LCT*: the Lower Devon Carselands beneath the Ochil hills escarpment.
 - 152 *Lowland River Valleys – Central LCT*: The middle Devon Water valley on the south-easternmost edge of the Ochils.
 - 154 *Lowland Valley Fringes LCT*: to the east of Clackmannanshire, separating the valley of the Devon Water to the north from the Forth estuary and adjacent plains to the south.
- 2.13 LVIA Table 7.2 excludes LCTs 152 *Lowland River Valleys – Central* and 154 *Lowland Valley Fringes* from further assessment because of limited visibility to the proposed development, and we agree that appreciable effects to the character of these LCTs can be discounted.

LCT 149 Lowland Hills – Central (host) – LVIA Table 7-11

- 2.14 Within Clackmannanshire the proposed development is located in the *Lowland Hills – Central* LCT (149), with the more northerly turbines in the *Lowland Hill Ranges* (382) of Perth & Kinross. The boundary between these two LCTs is artificial, following the local authority boundary, being of the same character in the vicinity of the proposed development site.

Sensitivity

- 2.15 This upland LCT encompasses the more southerly part of the Ochil hill range between Bridge of Allan and the River Devon in both Clackmannanshire and Stirling.
- 2.16 The susceptibility to the proposed development is assessed as ‘Medium’ in recognition of the relatively large scale and simplicity of the landscape, including the influence of existing wind energy developments. The LVIA recognises the value attributed to this landscape through the Ochils SLA / Ochil Hills/ Western Ochils³ Local Landscape Areas (LLA) designations, and the recreational interest of its hill summits such as The Nebit and Ben Cleugh. The assessed landscape value is ‘High’. We agree with the overall assessment of a ‘High’ sensitivity to the proposed development.

Magnitude and Effect

- 2.17 In terms of magnitude of impact, the LVIA rightly identifies a range of competing factors, on the one hand:

‘the “important close visual interrelationships between the hills and escarpments, and neighbouring lowland and carseland areas” within this LCT unit as the turbines would appear as new large-scale features interrupting the views across the LCT and wider landscape. The proposed development would also directly effect the LCT’s sense of “remoteness” afforded by the absence [of] settlement roads and hill tracks, as well as the LCT’s role in providing a “strong contrast” and “dramatic backdrop” to the surrounding settled areas to the north, west and south’.

- 2.18 On the other, the presence of existing wind turbines, particularly the Burnfoot cluster, is stated to lessen the magnitude of landscape change to some degree.
- 2.19 The assessment is for a ‘High’ magnitude of change within the site and for hill summits to the east and south of the site within 5km, and a ‘major’ significant effect within this distance.

³ The Ochils are covered by the three contiguous SLA/ LLA designations within Clackmannanshire (Ochils SLA), Perth & Kinross (Ochil Hills LLA) and Stirling (Western Ochils LLA)

- 2.20 We largely agree with this conclusion, and note the assessment recognises the important contrasting relationship between the hills and the carseland, and how the proposed development would have some effect to this relationship, which would be perceived beyond the boundaries of the LCT.

Cumulative Landscape Effects

- 2.21 With no consented (but unbuilt) or application developments within the LCT, the LVIA concludes that cumulative effects would be those identified in the primary/ 'solus' assessment.
- 2.22 The proposals would extend the influence of wind energy development within part of the LCT with significant cumulative effects locally, but they would not combine with developments in a way that creates widespread cumulative effects because the influence of existing wind energy development on the landscape overall is relatively low.

153 Carselands LCT (3.5km S) – LVIA Table 7-13

- 2.23 The LVIA concludes, in summary, that effects to this LCT would be minor and not significant, with no significant cumulative effects. We agree with this conclusion as the turbines of the proposed development would be strongly associated with the hills rather than the adjacent lowlands.

Conclusions on Effects to Landscape Character

- 2.24 We agree with the findings of the LVIA identifying a 'Major' significant adverse effect to the character of the host LCT 149 *Lowland Hills – Central*, but no significant effects to other landscape character areas/ types within Clackmannanshire. We consider that significant cumulative effects to landscape character within Clackmannanshire would be localised to the site and surrounds of the *Lowland Hills – Central* LCT.

Assessment of Visual Effects (LVIA 7.98 Onwards)

Effects to Visual Receptors at Viewpoints (LVIA Table 7-16)

Primary/ Solus Effects at Viewpoints

- 2.25 The assessment of visual effects is supported by 20 viewpoint assessments, five of which (VPs 1, 2, 5, 8, 9) are located in Clackmannanshire.
- 2.26 A summary of the Applicant's assessments, and where applicable our alternative assessments and comments, are provided in Appendix 1 at the end of this report.
- 2.27 In summary, the LVIA identifies significant adverse visual effects from the hill top viewpoints close to the site (VP1 Ben Cleuch, VP2 The Nebit), but no

significant adverse visual effects from lowland viewpoints (VP5 B9140 near Collyland, VP8 Alloa Tower, VP9 Clackmannan Tower).

- 2.28 While agreeing that visual effects would be significant adverse from VPs 1 and 2, in our view they would also be significantly adverse from VP8 Alloa Tower and VP9 Clackmannan Tower. At these viewpoints we assess a higher magnitude of change than the Applicant ('Low/ Medium' versus 'Low'). While it is agreed with the LVIA that the scale of visual change would be limited, the prominence of the visible turbines, seen as a disturbance to the skyline of the Ochil hills, increases the magnitude of change and therefore the significance of the effect. We therefore assess the visual effect at both viewpoints to be significant.
- 2.29 At VP5 (B9140 near Collyland) the LVIA incorrectly aggregates the sensitivity of visual receptors (residents 'High' and road users 'Low') into a single assessment of 'Medium'. This approach is incorrect, and effects should be assessed for each receptor type the viewpoint represents. Nevertheless, despite the LVIA noting the presence of residential properties close to the viewpoint we do not identify any properties, with the viewpoint primarily representing views available to road users travelling obliquely to the direction of the proposed development, for whom we consider effects would not be significant.

Cumulative Effects at Viewpoints

- 2.30 The LVIA's position on cumulative effects is unclear. At all viewpoints with views to other windfarms the cumulative assessment states that *'The level of effect would therefore remain as identified in the primary assessment'* but it is unknown if cumulative effects are considered significant or not. We identify significant 'additional' cumulative effects at VP1 (Ben Cleugh), but at no other viewpoints.

Effects to Visual Receptors in Settlements (LVIA 7.100 onwards)

- 2.31 Settlements in Clackmannanshire falling within the ZTV taken forward for further assessment (LVIA Table 7.5) are **Alloa/ Sauchie** and **Clackmannan/ Kennet**. We agree that only these settlements are potentially significantly affected by views to the proposed development. We agree with the assessment of the LVIA that residents in settlements are of 'High' sensitivity to visual change.
- 2.32 Viewpoints 8 (Alloa Tower) and the wireline provided in Figure 7.36 (Sauchie, Church Grove) illustrate the type of views available from **Alloa/ Sauchie**, up to 7 blade tips and 3 hubs. The LVIA assesses a 'Low' magnitude of change and a 'Minor' non-significant effect to the settlements. While we agree that the proposals are unlikely to result in an overall significant adverse visual effect across these settlements because of screening elements, there would likely be localised significant adverse visual effects where turbines become visible.

- 2.33 Viewpoint 9 (Clackmannan Tower) is illustrative of views available from **Clackmannan/ Kennet**, albeit as pointed out in the LVIA this viewpoint is somewhat more elevated than the settlement. The ZTVs predict visibility to 6 tips and up to 4 hubs, but in reality visibility would be restricted by buildings and trees. The LVIA assesses a 'Low' magnitude and 'Minor' non-significant effect for the settlement(s) overall, which is a reasonable conclusion, albeit some localised significant adverse effects are likely where unrestricted views are available.
- 2.34 Cumulative wind farms visible from settlements are the relatively distant developments to the south within the Stirling, North Lanarkshire, and Falkirk local authority areas, and we agree with the LVIA that there would be no significant cumulative effects from the proposed development with these schemes.

Road Routes (LVIA 7.101 onwards)

- 2.35 Routes are scoped in or out of the assessment in LVIA Table 7.6. Only A roads are considered and no road routes within Clackmannanshire identified on Table 7.6 are scoped into the LVIA for detail assessment. Roads and other routes together with the ZTV are shown on LVIA Figure 7.2b. We comment on the main road routes (A and B) within Clackmannanshire which pass through the ZTV as follows:
- A876 – only a short section of this route is within Clackmannanshire close to the border with Fife. Northbound road users would have relatively open views to the Ochil hills and up to 6 blades and 4 hubs at around 12km distance. For fast moving road users, effects are unlikely to be significantly adverse.
 - A907 – There is theoretical visibility from the Gartarry Roundabout until Alloa. Views would be more readily available for the section of the road immediately west of the Gartarry Roundabout (6 blades, 2 hubs), with views becoming progressively more screened including within the urban area of Alloa. For fast moving road users effects are unlikely to be significantly adverse.
 - A908 – The section of this route falling within the ZTV is entirely within the urban area of Alloa and Sauchie, from where views would be mostly screened by built development. Effects from the route would not be significant adverse.
 - A977 – This is a short section of route including the Kilbagie and Gartarry roundabouts. There are open views to the Ochil hills for northbound travellers including views to up to 2 hubs and 6 blades seen at approximately 10km. However, for users of main roads effects would not be significantly adverse.

- B908 – More southerly parts of the route within the ZTV pass through the urban areas of Alloa and Sauchie from where views would be restricted. Further north, views become more open and there would be up to 3 blades and 1 hub visible at 5 - 6km (e.g. at the B908/ B9140 roundabout), reducing to a single blade towards Alva. Northbound travellers would be moving in the direction of the wind farm, but with roadside vegetation providing intermittent screening. Views would be to the SLA and therefore of 'Medium/ High' value, with some travellers having interest in attractive views, for example if travelling to Alva Glen ('Medium' susceptibility). Overall, I assess the sensitivity of visual receptors on this road to be 'Medium/ High'. Taking into consideration the small numbers of turbines and hubs visible, and the screening effects of vegetation, I assess the magnitude of impact to vary from 'Low/ Medium' to 'Negligible', a **locally 'Moderate' significant adverse** effect from parts of the route. While views are similar to those from nearby VP5, I consider that the presence of the wind farm in the direction of travel for northbound travellers increases the magnitude of the effect (GLVIA3 6.40), contributing to its significance. Cumulative effects would not be significant.
 - B909 – views from this road in the direction of the proposed development are substantially restricted by roadside vegetation. No significant visual effects are predicted.
 - B9096 – Parts of this route within the ZTV are within the urban area of Alloa, with limited views to the proposed development likely.
 - B910 – sections of this route northeast of Clackmannan would have views of up to 6 blades and 2 hubs at 9km distance, but obliquely to the direction of travel. Views would be similar to those obtained from the Clackmannan Tower (VP9). For road users of intermediate sensitivity ('Medium') I assess visual impacts to be 'Low/ Medium' and 'Minor to Moderate' adverse but not significant. It is noted NCN 764 follows this road, effects to which are addressed in the following section.
 - B9140 – Effects from this route are represented by VP5, from where 'Minor' and non-significant effects are predicted in the LVIA. Given the relatively low visual impacts, and a direction of travel oblique to the proposed development, effects from this route are unlikely to be significant adverse.
- 2.36 We consider it to be an omission of the LVIA to not undertake an assessment of effects from B roads, which are used by large numbers of visual receptors. We identify locally significant effects from the B809 south of Alva.

Recreational Routes – Core Paths/ Rights of Way/ Other Recreational Routes (LVIA Table 7.6 for route scoping)

- 2.37 While the LVIA considers effects to Core Paths and PRoW within 5km of the proposed development, all other routes within Clackmannanshire are 'scoped

out' of the assessment, and the LVIA does not consider effects from the popular hill tracks providing access to the Ochil hills from Glen Alva including The Nebit and Ben Cleuch.

- 2.38 The assessment does not extend to the many Core Paths within the lowland parts of Clackmannanshire. Other routes of interest are the Devon Way/ NCN 767 and NCN 764, both of which are scoped out of detailed assessment in LVIA Table 7.6. We consider effects to routes within Clackmannanshire as follows.

Ochils Paths

- 2.39 Popular walking circuits from Alva and Tillicoultry visit The Nebit, Ben Ever, Ben Cleuch and The Law following well defined routes⁴. Significant adverse visual effects are identified in the LVIA from the OS marked panoramic summits of The Nebit and Ben Cleuch, but significant effects on routes from which these hills are accessed are not acknowledged in the LVIA. This would include **significant effects** from Ben Ever and the route from here to Ben Cleuch (in either direction). Several turbines would also be visible from The Law and the approaches to its summit also with significant visual effects. Other wind energy developments in the Ochils would be screened from these routes until close to the summit of Ben Cleuch, and therefore significant cumulative effects would not occur except locally when close to the Ben Cleuch summit.

Core Paths & Other Routes

- 2.40 There are a large number of Core Paths within the lowland areas of Clackmannanshire, in both rural and urban locations. While the LVIA has not undertaken an assessment of Core Paths beyond 5km, we consider effects to selected routes. Visual receptors are assumed to be interested in views/ visual amenity ('Medium/ High' susceptibility), and landscape value is assessed as 'Medium', with overall sensitivity 'Medium/ High'.

Routes south of Clackmannan/ Alloa north of the River Forth (NCN 76 Core Paths CC0020, CC0050, CC0051, CC0053)

- 2.41 Views from these routes are broadly represented by VP9 from where there would be relatively open views towards the Ochils, as there would be also further south from the viewpoint (refer to Image 3 in Appendix 3 of this report). As illustrated at VP9, the scale of visual change would be limited, however the magnitude of change is exacerbated to a degree through the breaching of the otherwise uninterrupted skyline of the Ochils. Visual impacts would be 'Low/ Medium', and **'Moderate' significant adverse** from parts of these routes.

⁴ Routes from various sources available such as <https://fifewalking.com/find-a-walk/ochils/ben-cleuch-from-alva/> or <https://www.walkhighlands.co.uk/fife-stirling/ben-cleuch.shtml>

Routes north of Clackmannan/ east of Alloa (NCN 764, CC0043)

- 2.42 There would be some views to the proposed development from sections of the NCN764 (refer to Image 2 in Appendix 3 of this report) north of Clackmannan and the Core Path CC0043, up to 6 blades and 1 turbine hub. I assess the magnitude of change to be 'Low/ Medium' and **'Moderate' significant adverse** from parts of these routes.

Core Path south of Alva (following the B908)

- 2.43 This route follows the B908 connecting Alloa to Alva, providing a walking route to Alva Glen and the Ochils. The visual change brought about by the proposed development would be similar to that at VP5, but the magnitude of change is influenced by the principal direction of view for walkers heading in the direction of the proposed development. Up to 1 hub and 3 blades would be visible above the Ochils skyline, with a 'Low/ Medium' magnitude of impact and **'Moderate' significant adverse** visual effect for part of the route.

Rail Routes: Stirling–Alloa–Kincardine rail link

- 2.44 Effects from this route are scoped out of the LVIA in Table LVIA 7.6. The route passes through the ZTV at Alloa and to the east. However, we consider that the sensitivity of rail travellers would be relatively low, as would visual impacts experienced from the route, and significant effects are not likely.

Gartmorn Dam (Country Park)

- 2.45 Gartmorn Dam Country Park is not assessed as a visual receptor location, albeit it is included in the assessment of effects to The Forest SLA within the LVIA.
- 2.46 Gartmorn Dam is a location of significant local visitor interest, designated as a Country Park, Local Nature Reserve and SSSI. The ZTV shows visibility of up to 4 blades and 1 hub from routes passing south and west of the open water body from where views to the Ochils are available, with turbines visible at approximately 7.5km. Views to the Ochil hills contribute much to the outward views from west and south of the waterbody, providing a dramatic backdrop of steep hills with complex topography.
- 2.47 Moving turbine blades would be seen above the Ochils skyline at approximately 7.5km distance, and would be aligned to the direction of travel when walking north along the dam (refer to Image 1 in Appendix 3). Views would also be available locally from the path on the southern side of the waterbody where an elevated viewpoint across the water has been established, albeit from here views would be reduced to 3 blade tips.
- 2.48 We consider that moving turbine blades would be very easily noticeable and a distracting element of views to the escarpment otherwise unaffected by obvious development, with visual impacts of 'Low' magnitude and **'Moderate'**

significant adverse effects to receptors of 'Medium/ High' sensitivity, albeit experienced locally within the Country Park.

Conclusions of Visual Effects

- 2.49 We consider that the LVIA has underestimated the visual impact of the proposed development, in particular the magnitude of visual change that would be experienced from the proposals being seen above the skyline of the Ochil hills. This has resulted in receptors subject to potentially significant effects being scoped out of the assessment.
- 2.50 We consider that there would be significant adverse effects from various locations with more open views to the proposed development. Within settlements, views would tend to be screened by built development, however the Ochil hills tend to come in and out of view, for example seen along streets or from open spaces, from where significant effects may be experienced.
- 2.51 The LVIA has also omitted to assess effects from routes within the Ochil hills which form popular walking circuits, for example connecting The Nebit, Ben Ever, Ben Cleuch and The Law, from where significant adverse effects would be experienced.

Assessment of Effects to Designated Landscapes (LVIA 7.102 onwards)

Introduction

- 2.52 LVIA 7.102 states that the proposed development is not located within any designated landscape, but this is assumed to be an error, as the proposals are located within the Ochils SLA (note the Western Ochils LLA in Stirling is missing from LVIA Figure 7.5a).
- 2.53 The Clackmannanshire Local Development Plan (Adopted 2015)⁵ p167 *Appendix EA1: Special Landscape Areas - Statement of Importance* describes the Ochils SLA, and assessed in LVIA Table 7-50.
- 2.54 There is no published guidance on how effects to local landscape designations should be assessed, however NatureScot publish guidance on the assessment of effects to the Special Landscape Qualities (SLQs) of National Scenic Areas and National Parks (AESLQ)⁶, the principles of which can be readily applied to local landscape designations.
- 2.55 In the above mentioned guidance para 9 '*SLQs are defined as the characteristics that make a designated landscape special in terms of landscape*

⁵ <https://www.clacks.gov.uk/document/6862.pdf>

⁶ <https://www.nature.scot/doc/special-landscape-qualities-guidance-assessing-effects>

and scenery, both individually or combined. They are qualities that are perceived and experienced by people, affecting the sense of place.'

2.56 In essence, the focus of the assessment should be on how a proposed development affects the 'special qualities' (SQs) for which a landscape is valued and therefore recognised by designation, according to the 'susceptibility' of the SQ in question and the magnitude of change to the SQ brought about by a proposed development. As a further step, such an assessment may consider whether the change affects the integrity of the designation as this is a policy test of NPF4. NatureScot guidance⁷ on the siting and design of wind farms reflects this approach (3.10 – 3.12).

2.57 There is no guidance on how effects to 'integrity' should be assessed, but draft consultation guidance for AESLQ published by NatureScot in May 2024 stated '*Overall integrity means the wholeness of the area, the unity or soundness of the whole being unimpaired. Adverse effects even to a part of the designation could be damaging to the unity or soundness of the whole*'. The guidance goes on to state in relation to NSAs and National Parks:

'Assessment of whether 'integrity' has been 'compromised' requires consideration of the nature of the locations affected and the nature of their qualities. For this assessment, compromise is taken to mean where significant effects result in an evident and noticeable material change to any of the NP or NSA's SLQs. For integrity to be compromised, this does not depend on an extensive area or large number of SLQs being significantly affected'.

2.58 This part of the draft guidance was omitted from its final version, perhaps because for NSAs/ NPs this is an assessment for the decision maker rather than an applicant.

Effects to the Ochils SLA

2.59 LVIA Table 7-50 assesses the three Ochils LLA/ SLAs together, identifying a 'Medium' magnitude of change and a 'Moderate' (significant) effect to parts of the Ochil Hills LLA and Ochils SLA (i.e. including the Clackmannanshire SLA) within 5km of the proposed development. The assessment states this to ...'*include the site and hills summits and site-facing slopes to the north, east and south of the proposed development where the "relatively wild and tranquil" quality and "dramatic" hills and summits would be most affected*'. Beyond 5km significant effects to SQs are not predicted. The overall integrity of the designation(s) is judged in the LVIA not to be compromised, and no significant cumulative effects to the SLA are predicted.

⁷<https://www.nature.scot/sites/default/files/2017-11/Siting%20and%20designing%20windfarms%20in%20the%20landscape%20-%20version%203a.pdf>

- 2.60 While not disagreeing with much of this assessment as far as it goes, we consider that it misses effects to the most important SQ of the SLA, which is to *'the rising steep hill slopes above the Hillfoot settlements'* above which turbines of the proposed development would be seen. The SLA citation describes how the Ochils are a *'striking landscape feature in the landscape of Central Scotland'*, the scarp slope an *'especially important local and regional feature'* with the hills having a high wildness value compared to adjacent areas of the Central Belt. We consider that the presence of the proposed development in views towards the Ochils escarpment would **significantly affect this special quality** which is fundamental to the designation.
- 2.61 We also note that the SLA citation refers to views from the vicinity of Ben Cleuch over Strathallan and distant views to the Highlands. There would be **significant effects to this attribute of the SLA** as illustrated at VP1.
- 2.62 While the existing wind energy development within the SLA has some significant effects on the SQ of the *'...large scale topography of rounded slopes and hill summits...'* of the northly plateau of hills in the SLA, as experienced at Ben Cleuch, the proposed development extends the influence of wind energy across the SLA quite markedly. From within the SLA the proposed development would introduce views to turbines from hill summits such as The Nebit, The Law and Ben Ever where existing turbines in the Burnfoot cluster are not visible. The proposals would increase cumulative visual effects of wind energy from Ben Cleuch significantly. Wind energy development would be perceived as a feature of the SLA to a much greater extent than it is at present.
- 2.63 Taking account of the above described effects, we consider that **the integrity of the SLA would be compromised**, noting that, should the development be consented and applying the principles of GLVIA3, the susceptibility of the SLA to wind energy would be reduced, which is likely to increase pressure for further development.
- 2.64 Relevant special qualities and attributes of the SLA and commentary on how they may be affected is provided in Appendix 2,

Effects to the Forest SLA

LVIA Table 7-52 states that much of the designated area is enclosed by woodland which restricts outward views, but that blade tips and a turbine hub would be visible from the dam of Gartmorn Dam. While the LVIA acknowledges an effect to the SLQ of *'The ridges around Gartmorn Dam offer striking views over the water and views northwards to the Ochils...'* these effects are assessed to be minor and not significant.

- 2.65 We consider that there would be some localised significant adverse visual effects from the SLA, described earlier in this report and illustrated in Appendix 3, resulting in a **significant effect** to the SLQ relating to the *'striking views over*

the water northwards to the Ochils'. Cumulative effects would not be significant.

Conclusions on Effects to Designated Landscapes

- 2.66 While LVIA concludes that ~~that~~ there would be significant adverse effects to some SQs of the Ochils SLA, we consider that the LVIA has under assessed effects to SQs relating to the perception of the Ochils and its scarp slope from the Carse of Forth. The escarpment including its uninterrupted skyline is a fundamental attribute of the SLA. We therefore consider that the effects to the character of the SLA, together with significant effects on views from within and towards the SLA would compromise the integrity of the designation.
- 2.67 There would be a significant adverse effect to a SQ of the Forest SLA relating to the contribution of views to the Ochils from parts of the SLA which would become affected by views to turbine blades above the skyline.

3. OVERVIEW OF THE ASSESSMENT

- 3.1 The information presented in the LVIA is sufficient to understand the likely landscape and visual effects of the proposals, however we observe that many visual receptors have been scoped out of detailed assessment, who in our view may be subject to significant visual effects. We generally assess a greater level of visual impact and effect than the LVIA, with implications for our conclusions on effects to the Ochils SLA.
- 3.2 Our main observations on the assessment are as follows:
1. We consider that the visual impact of the proposals as seen above the Ochils from southerly lowland areas has in general been underestimated. While in our view the 'size/ scale' component of 'magnitude of change' is a principal determinant of magnitude of impact as set out in GLVIA3 para 6.39, there are other 'modifying' factors which influence the assessment of magnitude set out in GLVIA3 paras 6.39 and 6.40. In particular GLVIA3 para 6.40 refers to the '*...degree of contrast or integration of any new features...*' as a consideration for magnitude of change. One of the major attributes of the Ochil hills as seen from the carse of Forth are their absence of development and a wildness of character⁸ contrasting with that of much of the developed central belt of Scotland. The proposed development is rendered more conspicuous by the absence of visible wind energy, or other types and development, on the Ochil hills and its skyline as seen from the Carse of Forth in Clackmannanshire.
 2. Perhaps related to the point above, visual effects from many lowland areas have not therefore been fully assessed having been scoped out of the assessment, and effects from important walking routes in the

⁸ As referred to in the SLA citation.

Clackmannanshire Ochils have not been considered at all as part of the assessment other than at hill summits (VP1 and 2). In our view the threshold of effect for scoping receptors into the assessment has been set too high.

3. The LVIA does not include an assessment of visual effects from The Forest Country Park, an important recreational resource within Clackmannanshire with partial ZTV coverage. While the LVIA has undertaken an assessment of effects to SQs of the SLA, this is separate to an assessment of visual effects.
4. The assessment of cumulative visual effects is unclear, in all cases cumulative effects are assessed to '*...remain as identified in the primary assessment*' whether or not cumulative baseline windfarms have an appreciable impact.
5. The LVIA erroneously 'averages' the sensitivity of different visual receptors at VP5, the effect of which is to reduce effects assessed to be experienced by more sensitive receptors. At this viewpoint we do not consider that it affects the assessment as we do not identify the more sensitive receptor types (residents) with views that are represented by this viewpoint. It is not known if this aggregating of visual receptor sensitivity has influenced other parts of the visual assessment, including at the receptor scoping stage.

4. STRATEGIC WIND ENERGY GUIDANCE

Clackmannanshire Onshore Wind Energy SG (OWESG)

- 4.1 The 2015 Clackmannanshire Onshore Wind Energy Supplementary Guidance (OWESG) sets out a spatial framework for wind energy development plus sensitivity assessments, siting and design guidance, and cumulative considerations for seven landscape areas in Clackmannanshire.
- 4.2 The spatial framework set out in the guidance has been superseded by the adoption of NPF4. Areas identified as 'Group 2: Areas of significant protection', comprising most of Clackmannanshire for turbines >50m as shown on Map 1 of the SG, no longer apply, however the guidance provides useful information on landscape sensitivities, principles for wind farm siting and design, and cumulative matters.
- 4.3 The turbines of the proposed development straddle two landscape areas referred to in the OWESG. Most turbines in Clackmannanshire are located in the more northerly **Ochils Hills: Western Peaks** while T1 and 2 are within the **Ochil Hills: Southern Scarp**. These areas are a subdivision of the *Lowland Hills – Central*⁹ of the 2019 NatureScot landscape character assessment for

⁹ Previously 'Ochil Hills' LCA of the 1998 Clackmannanshire landscape character assessment (SNH/ ASH).

Scotland. This subdivision is made to reflect the differing sensitivities within the LCT of the visually exposed southern escarpment and the more contained landscape further north in which the proposals are mostly located along with the existing Burnfoot wind turbine cluster.

- 4.4 Appendix 5 of the OWESG assesses both landscape areas to be of 'Higher' sensitivity to large turbine typologies (>80m at the time of preparation of LDP).
- 4.5 The more northerly **Ochils Hills: Western Peaks** is described in OWESG to have a simple and large scale landscape, suggesting a lower sensitivity to wind energy development, however its sensitivity is increased by its high levels of recreational use and inward visibility from the north. Siting and design guidance recommends the siting of turbines well away from the highest ground of this area, which comprises the main ridge of the Ochils. Guidance cautions against 'overtopping' the Ochils and using higher hills as cover to screen views from the south, with careful consideration of ZTV maps required to ensure that turbine tips are not visible over the top of hills. Cumulative issues are identified as a key consideration, in terms of the avoidance of wind energy becoming a 'key characteristic', cumulative visual effects from Ochils hill summits, and compatibility of visual image presented by separate developments. OWESG concludes that it would be very difficult to accommodate new wind turbine developments here due to likely cumulative effects, recommending limited extensions to existing schemes (i.e. Burnfoot).
- 4.6 The **Ochil Hills: Southern Scarp** is assessed in OWESG to have in effect no ability to accommodate wind energy development because of the likely overbearing nature of wind turbines on the scarp.
- 4.7 Therefore, we consider that the proposed development fails to meet the recommendations of the OWESG for two main reasons:
- The siting and design of the wind farm does not allow it to be fully contained by higher hills of the neighbouring 'Southern Scarp' and is seen to 'overtop' the Ochils skyline (see VPs 8, 9 also 15 just beyond the boundaries of Clackmannanshire) with resultant significant adverse visual effects.
 - The significant adverse cumulative effects from the hill summit of Ben Cleuch, with the proposals greatly extending the angle of view occupied by turbines, with a larger visual impact than existing or consented schemes from this popular hill summit.

5. WINDFARM SITING AND DESIGN

- 5.1 The proposed development is set behind the southernmost hills of the Ochils escarpment on a plateau of rounded hills and shallow glens, with turbines sited at between approximately 450 and 550m AOD. As noted in the OWESG the landscape is of a relatively large scale, with a simple landcover, albeit with

some complex topography in the vicinity of the wind farm including deeply incised glens particularly to the south.

- 5.2 Turbines are set out in an arrangement elongated from north to south, with a layout seemingly dictated by the need to avoid the small glens and watercourses running through the site. Wind turbine layouts should in general respond to the topography on which they are located, and in this case the site comprises a series of smaller and indistinct landform features, none of which on their own dictate a design response, and therefore the appearance of a clustered turbine layout is likely to be the most successful. EIAR Chapter 2 refers to presenting a simple visual image, appearing visually balanced and coherent (EIAR Chapter 2 para.2.40).
- 5.3 Landscape and visual design objectives as set out in EIAR Chapter 2 para.2.42 relevant to Clackmannanshire include:
- Reducing visibility/ dominance of turbines above the Ochils.
 - Avoiding breaking the skyline in views north from Ben Cleuch.
 - Minimise views from cultural heritage assets e.g. Alloa Tower.
 - Avoiding an apparent disparity of scale with other wind energy developments.
- 5.4 It is appreciated that no wind farm can present an 'ideal' visual appearance from every viewpoint, and the focus should therefore be to consider the appearance of the proposals from more sensitive locations, with VP1 Ben Cleuch considered the most sensitive nearby location from where the wind farm is visible as an entity, a popular hill summit, the highest of the Ochil hills, and a panoramic viewpoint marked on OS maps.
- 5.5 From this location the turbines are seen as an extended array rather than a cluster, in two loose groupings, occupying approximately a 50 degree angle of view, and extending from the relatively compact Burnfoot cluster¹⁰. Turbines are seen at varying heights, and from this location turbines do not present as obviously simple, coherent, or balanced. It is noted how from here the proposed development impinges on views of the Southern Highlands. However, their prominence is reduced to an extent through being seen below the skyline formed by these more distant hills, and turbine stacking/ overlapping is relatively limited.
- 5.6 From lowland areas to the south, while stated design objectives seek to minimise views of turbines above the Ochils, VPs 8 and 9 demonstrate that the

¹⁰ Including Burnfoot, Rhodders, Burfoot North, Burnfoot East.

proposed development would be a very noticeable feature of the Ochils skyline resulting in significant adverse visual effects.

- 5.7 Turbines 2, 1, 6, 3, 4 and to a lesser degree 5, i.e. the more southerly turbines account mostly for significant visual effects from VPs 8, 9 and 2. Were it possible to remove these turbines the remainder would benefit from partial landform screening by Ben Buck as viewed from VP1 Ben Cleuch and impinge to a lesser extent on north westerly views to the Southern Highlands. While significant visual effects, and cumulative effects would remain from VP1 they would be reduced, with significant effects from lowland areas to the south less likely.

6. REVIEW AGAINST LOCAL AND NATIONAL PLANNING POLICY

Local Planning Policy

- 6.1 The following parts of the **2015 Clackmannanshire Local Development Plan** are considered of greatest relevance with respect to the landscape and visual impacts of the proposed development.

- 6.2 **Policy SC14** - Renewable Energy of the 2015 Clackmannanshire Local Development Plan states renewable development will normally be supported where meeting criteria including:

'The development would not have a significant adverse impact on the quality and distinctive character of the local or wider landscape;'

- 6.3 **Policy SC15** - Wind Energy Development states that wind energy development will normally only be supported where the proposal meets criteria including:

'satisfies the criteria contained in Policy SC14 'Renewable Energy'; accords with the guidance contained in the Onshore Wind Energy SG'

- 6.4 **Policy EA4** addresses effects to Special Landscape Areas from developments of all types:

'In Special Landscape Areas development will only be supported where the applicant demonstrates to the satisfaction of the Council that the special landscape character and scenic interest would not be significantly adversely affected, and that either of the following criteria are met:

- The development is an essential requirement of agriculture or horticulture; renewable energy development; appropriate recreation and tourism activities; or forestry which conforms with the Forestry and Woodland Strategy.*

- *The development could not be located in a less sensitive location, and any adverse impacts are clearly outweighed by social, environmental or economic benefits of local importance.'*
- 6.5 Some of these policy criteria differ from those of NPF4. Policy SC14 refers to significant 'local' landscape effects which may be considered acceptable under NPF4. Policy EA4 requires for SLAs that '*special landscape character and scenic interest would not be significantly adversely affected*' whereas under NPF4 such effects may be acceptable if outweighed by the benefits of the proposals. A greater level of landscape and visual change may therefore be acceptable under NPF4 (discussed below) compared to the policies of the LDP.
- 6.6 A review of the 2015 Clackmannanshire LDP suggests that the proposed development may be contrary to several of its policies relating to landscape namely:
- The proposed development would have significant adverse effects on Clackmannanshire SLAs contrary to EA4.
 - This may also be interpreted as being contrary to Policy SC15 because of effects '*...on the quality and distinctive character of the local or wider landscape.*'
 - As described in the earlier section of this report, the proposed development would be contrary to the guidance of the Clackmannanshire OWESG, and therefore contrary to Policy SC14.

National Planning Framework 4

- 6.7 **National Planning Framework 4 (NPF4)** sets out a number of policies against which landscape and visual effects of wind energy development are tested.
- 6.8 In relation to local landscape designations such as SLAs, the test for the acceptability of effects relates to impacts on the integrity and special qualities of the designation weighted against the benefits of the scheme. Policy 4d states:
- 'Development proposals that affect a site designated as a local nature conservation site or landscape area in the LDP will only be supported where:*
- i. Development will not have significant adverse effects on the integrity of the area or the qualities for which it has been identified; or*
 - ii. Any significant adverse effects on the integrity of the area are clearly outweighed by social, environmental or economic benefits of at least local importance.'*
- 6.9 NPF4 Energy Policy 11eii states in relation to landscape and visual impacts that:

*‘...recognising that such impacts are to be expected for some forms of renewable energy. Where impacts are **localised** and/ or **appropriate design mitigation** has been applied, they will generally be considered to be acceptable;’ [our emphasis in bold].*

- 6.10 As to compliance with the policies of NPF4, the proposed development would have significant adverse effects to some SQs, and in our opinion the integrity, of locally designated landscapes, albeit these effects would need to be balanced against the benefits of the scheme (Policy 4d).
- 6.11 The degree to which the effects of the proposed development can be considered ‘localised’ and/or appropriate mitigation having been applied (Policy 11e) is a matter of judgement.
- 6.12 There is no definition for ‘localised’ but Scottish Ministers’ recent determinations, for example Garvary wind farm¹¹, suggest that a range of factors beyond simply geographical extent may be logical considerations, for example the number and sensitivity of affected receptors. There is also no measure for determining whether appropriate design mitigation has been applied.
- 6.13 We consider that the significant effects likely from the lowlands south of the Ochils scarp would occur from relatively long distances within Clackmannanshire (>10km). While significant visual effects would be intermittent from these lowland areas because of screening effects from built development, trees, etc. they would affect relatively high numbers of visual receptors for whom views to the Ochils are important and contribute much to the distinctive ‘sense of place’ to the Carse of Forth in Clackmannanshire. It should also be considered that the views to the Ochils are not confined to Clackmannanshire but are important and valued from neighbouring local authorities. The citation for the directly affected Ochils SLA refers to the uniqueness of the Ochils as a feature of central Scotland, and their value both locally and regionally. We also note the high numbers of recreational users of the Ochil hills subject to significant adverse effects, including from the highest hill of the Ochils, visited by people from Clackmannanshire and further afield. Taking these factors into account effects are not considered ‘localised’.
- 6.14 Given the aforementioned effects to sensitive receptors experienced beyond the immediate locality of the proposed development, we consider that appropriate mitigation has not been applied and that a design objective should have been to prevent rather than reduce visibility above the Ochils in line with the Clackmannanshire OWESG.

¹¹ Garvary decision notice para 227 (WIN-270-20)
<https://www.dpea.scotland.gov.uk/CaseDetails.aspx?ID=123955>

7. OVERALL CONCLUSIONS

- 7.1 It is agreed with the applicant that significant effects to landscape character, including cumulative effects, would not extend beyond the 'host' *Lowland Hills – Central LCT* of the Ochils, and the LVIA acknowledges significant effects to landscape character perceived from hill summits to the east and south to 5km.
- 7.2 Greater differences arise in relation to visual effects, with the LVIA assessing that significant effects within Clackmannanshire would be confined to hill summits of the Ochils only and not extend south to the lowland areas of the Carse of Forth. In our view, the LVIA has under assessed the visual impact of the proposals from this area, and indeed prematurely 'scoped out' receptors for whom we consider significant effects likely.
- 7.3 While the visualisations show a relatively low scale of change from these southerly locations, the positioning of visible turbines 'overtopping' the uninterrupted skyline of the Ochils accentuates their visual impact. While it is acknowledged that turbines would not always be visible within the ZTV, even low levels of visual impact caused by turbines or blades breaching the skyline are likely to result in significant effects from the populated areas in and around Alloa, Clackmannan and Sauchie. The Ochils form a distinctive and dramatic backdrop to everyday views from the south, and it's hard to believe that the proposed development wouldn't be perceived as a detracting feature by many visual receptors in this area and beyond.
- 7.4 Significant effects to landscape character and to views from within and towards the Ochils SLA lead us to conclude that some of its 'special qualities' would be significantly affected, which is acknowledged in the LVIA.
- 7.5 We also consider that the integrity of the designation would be compromised because there would be a detrimental effect to the perception of the '*...rising steep hill slope above the Hillfoot settlements...*' which is a '*...unique feature of Central Scotland*', the special quality which underpins the designation. Furthermore, from within the SLA, the characterising influence of wind energy would be apparent from popular hill summits and routes where the other SQs of the SLA are appreciated. It is also relevant to note that the consenting of the scheme as proposed would change the landscape and visual baseline for future applications, with wind energy becoming more greatly 'characteristic', making further development on the highly sensitive Ochils skyline more likely.
- 7.6 We do not consider that the proposed development complies with the guidance of the Clackmannanshire OWESG, which has a clear objective of containing wind energy development behind the southerly hills of the Ochils scarp to prevent overtopping. The proposals would also result in significant adverse cumulative effects from the hill summit of Ben Cleuch, the highest point of the Ochils, which OWESG seeks to limit. For this reason, the proposals are likely to be contrary to policies of the Clackmannanshire LDP relating to the SLA and wind energy development.

- 7.7 In the context of NPF4 policy considerations, we do not consider effects to be 'localised' as the proposals would impact upon a landscape of regional significance which is widely appreciated by people for its scenic qualities and recreational value, in addition to the relatively wide geographical extent of significant visual effects. In our view, mitigation by design has been insufficient to adequately reduce effects to sensitive receptors. However, it seems possible that a scheme of fewer turbines could potentially be accommodated where reducing significant effects towards the south and from Ben Cleuch.

APPENDIX 1: Summary of Viewpoint Assessments

Notes:

Locations shown in **bold** have been visited by IFL.

Cumulative Scenario 1 includes consented but unbuilt wind farms, Scenario 2 includes application developments

The LVIA assessment is shown in black font., IFL alternative assessments are shown in *(red italics)* where different. Significant effects in **bold/ bold**

Viewpoint (Viewpoints in bold have been visited)	Receptors/ Sensitivity	Magnitude of Change	Effect	Cumulative Scenario 1		Cumulative Scenario 2		IFL Comment
				'Additional' Magnitude	Effect	Additional Magnitude	Effect	
1. Ben Cleuch 2km SE	Walkers (High)	High	Major	? <i>(High)</i>	? <i>(Major)</i>	? <i>(High)</i>	? <i>(Major)</i>	LVIA for both cumulative scenarios states 'The level of effect would therefore remain as identified in the primary assessment'. Unclear if LVIA assesses the 'additional' cumulative effects to be significant.
2. The Nebit 2.2km S	Walkers (High)	Medium <i>(Low/ Medium)</i>	Moderate	? <i>(Negligible/ Low)</i>	? <i>(Minor)</i>	? <i>(Negligible/ Low)</i>	? <i>(Minor)</i>	LVIA states 'The level of effect would therefore remain as identified in the primary assessment'. Given the relatively low influence of other wind energy development in the view cumulative effects not to be significant.
5. B9140 near Collyland 5.5km S	Road Users (Low <i>(Low/ Medium)</i>) Residents (High) Overall Medium	Low	Minor <i>(Residents, Moderate)</i>	None	None	None	None	Receptors should be assessed as two separate groups. Effects to residents would likely be significant, albeit we do not identify any residential properties along the B9140 near this VP.
8. Alloa Tower 8.3km S	Recreational Receptors (High)	Low <i>(Low/ Medium)</i>	Minor <i>(Moderate)</i>	? <i>(Negligible/ Low)</i>	? <i>(Minor)</i>	? <i>(Negligible/ Low)</i>	? <i>(Minor)</i>	LVIA states 'The level of effect would therefore remain as identified in the primary assessment'. Given the relatively low influence of other wind energy development in the view cumulative effects not to be significant.

Viewpoint (Viewpoints in bold have been visited)	Receptors/ Sensitivity	Magnitude of Change	Effect	Cumulative Scenario 1		Cumulative Scenario 2		IFL Comment
				'Additional' Magnitude	Effect	Additional Magnitude	Effect	
9. Clackmannan Tower 9.1km S	Recreational Receptors (High)	Low <i>(Low/ Medium)</i>	Minor <i>(Moderate)</i>	? <i>(Negligible/ Low)</i>	? <i>(Minor)</i>	? <i>(Negligible/ Low)</i>	? <i>(Minor)</i>	LVIA states ' <i>The level of effect would therefore remain as identified in the primary assessment</i> '. Given the relatively low influence of other wind energy development in the view cumulative effects not to be significant.

Appendix 2. Assessment of Effects to the Ochils SLA

Extracts from Clackmannanshire LDP Appendix EA1: Special Landscape Areas - Statement Of Importance

(emphasis in **bold** added by IFL to highlight relevant attributes of the designation).

Overview

*The **prominent mass of the Ochil Hills** forms an **abrupt northern boundary** to the Forth Valley and includes Ben Cleuch (721m), the highest point in the Ochils, a prominent and distinct hill when viewed from the carse land to the south and in more distant views towards the Ochil Hills. The rolling hill summits are characterised by peaty ground and extensive stretches of grass and heather moorland with no tree cover. The southern escarpment is deeply fissured by minor watercourses forming a series of glens between Menstrie and Dollar. In general woodland is sparse along the southern slope of the hills apart from the deciduous woods between Alva and Tillicoultry, the Woodland Trust's Geordie Wood above Muckhart and the conifer plantations above Dollar.*

Key Landscape and visual characteristics

*The Ochils form a **stunning backdrop to Clackmannanshire** with a dramatic **contrast in topography between the steep profile of the hills and the flat valley floor of the Devon Valley to the south**. The **contrast is emphasised by the rough vegetation** and craggy outcrops of the scarp slope.*

Special qualities

*The rising **steep hill slope above the Hillfoot settlements** to high moorland plateau in a compact form is a **unique feature in Central Scotland**. Rock outcrops on the southern face of the hills offer evidence of the geological past of Central Scotland. The **large scale topography of rounded slopes and hill summits is dramatic**, with rolling grassy or peaty ridges and braes. The southern escarpment is incised by a number of dramatic and scenic gorges, including those of Mill Glen, Alva Glen and Dollar Glen. The character of the SLA is enhanced by elements of cultural heritage including a number of hill forts, and Castle Campbell, which sits within Dollar Glen.*

Striking Views

*The southern hill summits offer panoramic views of the meandering upper Forth, and its progression as a widening estuary to the sea, as well as views eastwards to the Forth bridges and southwards across the Forth Valley to the Slamannan Plateau and Bathgate Hills. **Hill summits in the vicinity of Ben Cleuch offer views over Strathallan as well as distant views of the Highlands to the north**. The Ochils are in themselves a **striking landscape feature in the landscape of Central Scotland, rising from the floor of the Forth Valley**.*

Sensitivity to Change

*The **southern scarp slope is an especially important local and regional feature** which requires to be **protected from insensitive development**. This is especially important at a local level in the vicinity of the glens which stretch back into the hill massif. The Ochils, in comparison with the rest of Scotland have an average wildness value, however, when **compared with adjacent areas of the Central Belt they have a high wilderness value** even though the artefacts of modern Scotland are clearly viewed from the hills. This regional factor supports a restrictive planning approach in the Ochils.*

The Ochils have two essential landscape components, the high plateau and the dramatic southern escarpment. The plateau is a large scale, simple landscape of tightly knit hills with capped by smooth rounded tops. It is mainly peaty ground with extensive stretches of grass and some heather moorland. It is uninhabited, exposed high ground crossed by paths with a high level of recreational use. It forms a prominent visual backdrop to the lowlands to the north. **The southern escarpment is also a prominent visual backdrop to the carseland to the south and the wider central Scotland lowlands.** Its slope is strongly fissured by deep glens with minor watercourses and rocky outcrops with native woodland in the glens and southern edge of the escarpment. Glen footpaths provide access to the high plateau. The ruggedness of the scarp, and the wide visibility of the Ochils, combined with their location adjacent to populated areas, gives them a unique character within Scotland. This character is **highly valued both locally and in the wider area** resulting in this landscape having a high sensitivity to change by all forms of development which requires a more restrictive planning policy approach.

Appraisal against relevant SLQs and attributes of the Ochil SLA

<u>Effects on the perception of the Ochils Hills from lowland Clackmannanshire</u> • <i>a stunning backdrop to Clackmannanshire</i> • <i>contrast in topography between the steep profile of the hills and the flat valley floor of the Devon Valley to the south</i> • <i>steep hill slope above the Hillfoot settlements</i> • <i>unique feature in Central Scotland</i> • <i>The large scale topography of rounded slopes and hill summits is dramatic</i> • <i>The Ochils are in themselves a striking landscape feature in the landscape of Central Scotland, rising from the floor of the Forth Valley</i> • <i>southern scarp slope is an especially important local and regional feature</i> • <i>compared with adjacent areas of the Central Belt they have a high wilderness value</i> • <i>The southern escarpment is also a prominent visual backdrop to the carseland to the south and the wider central Scotland lowlands</i>	<u>Appraisal</u> Many parts of the SLA citation refer to the dramatic backdrop that the Ochils provides to the floor of the Forth Valley, referred to as a striking feature of regional importance, with the Ochils a ‘prominent visual backdrop’ to the carseland and wider central Scotland lowlands. The citation refers to the contrast between the steep profile of the hills and the flat valley floor to the south, and contrasts between these landscape are also provided by the relative ‘wildness’ of the hills in compared to the heavily developed character of much of central Scotland. There would be some loss of this apparent ‘wildness’ of character which extends beyond significant visual effects. We consider that effects to these attributes of Ochil SLA SQs would be significant adverse.
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<i>highly valued both locally and in the wider area</i>	
<u>Effects on Views from the Ochil Hills</u> <i>Hill summits in the vicinity of Ben Cleuch offer views over Strathallan as well as distant views of the Highlands to the north.</i>	Striking views are described as an attribute of the SLA, if not referred to specifically as a SQ. As illustrated by effects from VP1 Ben Cleuch effects to this attribute of the SLA would be significant adverse, which turbines of the proposed development significantly affecting views in the directions referred to.

Appendix 3. Images

Image 1: View from Gartmorn Dam



View from Gartmorn Dam (291431, 693779) overlayed with a model of the proposed development (1 hub and 4 blades showing).
7.7km to nearest turbine, 50mm lens & 39.6 degree nominal field of view.

Image 2: View from NCN764



View from NCN764 northeast of Clackmannan (291915, 692524) overlayed with a model of the proposed development (1 hub and 5 blades showing). 9.1km to nearest turbine, 50mm lens & 39.6 degree nominal field of view.

Image 3: View from NCN76



View from NCN76 south of Clackmannan (291162, 690779) overlayed with a model of the proposed development (2 hubs and 7 blades showing). 10.5km to nearest turbine, 50mm lens & 39.6 degree nominal field of view.

