

Friends of the Ochils



11th August 2025

Energy Consents Unit
Directorate for Energy & Climate Change
The Scottish Government
5 Atlantic Quay
150 Broomielaw
Glasgow
G2 8LU

Dear Sir/Madam

Windburn Wind Farm. ECU ref: ECU00004782. Install and operate up to 13 wind turbines, 35MW of battery energy storage and associated ancillary infrastructure, on land in the Ochils Hills, approximately 2.9km north of the settlement of Alva

1.0 Introduction

1.1 Having reviewed the Windburn application for a windfarm of 13 turbines in the Ochils, the Friends of the Ochils (FOTO) **object** to it on the grounds detailed below. Our objection is primarily concerned with the landscape and visual impacts of the windfarm along with the negative impact on recreational amenity resulting from those impacts.

1.2 The Friends of the Ochils is a registered charity with over 140 members. It was established in 1993 and its aims and objectives are:

- to promote and conserve the landscape, natural beauty and wildlife of the Ochils, and to protect the historical and social character of the surrounding communities.
- to encourage consistent implementation of good planning policies appropriate to the other objects of the Association.
- To support responsible and well-behaved public access to the Ochils consistent with the Scottish Outdoor Access Code.

- To promote appropriate study of and research into relevant fields of interest pertaining to the Ochils and its local communities, and to promote dissemination of the results of such study and research.

1.3 The Friends of the Ochils recognise the significance of climate change and the need to generate renewable energy. In that respect, we recognise that policies such as NPF4 and the Onshore Wind Policy Statement (2022) assume that onshore wind farms will be built, but neither NPF4 nor OWPS assume that all wind farm proposals are in accordance with those policies. We wish to stress that we do not campaign either for or against wind power as a source of electricity generation, rather we strive to protect the Ochils in accordance with our aims and objectives.

2.0. Landscape and Visual Impact

2.1 Our primary concern is the adverse impact the proposed Windburn Wind Farm will have on the landscape, and the damage to visual amenity which results for those enjoying the Ochil Hills for recreation; for those who live both within the Ochils and in the areas within sight of the Ochils; and those visiting the area.

3.0 Impact on Recreational Amenity.

3.1 Every year, thousands enjoy walking, cycling and other activities in the Ochil Hills. For many, accessing the tops of the hills is their primary objective thereby enjoying the wide panoramic views across the hill range and out to the surrounding countryside. They are much loved local hills within a one-hour drive of 75% of the population of Scotland, much celebrated in literature, both novels and poetry. There are numerous guidebooks and websites describing the many accessible routes in the Ochils. A number of the hills in the Ochils are 'Donalds' - hills in the Scottish Lowlands 2000 feet in height and above.

4.0 Impact of NPF4 Policy 11.e.ii on the development.

4.1 This NPF4 policy states:

"In addition, project design and mitigation will demonstrate how the following impacts are addressed: (ii) Significant landscape and visual impacts, 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."

4.2 We fundamentally disagree with the position taken that the development can be justified under NPF4 Policy 11.e.ii because its impact is localised. The ZTV Fig 7.2b shows just how visible the turbines would be from a wide swathe of the countryside around the Ochils as well as from within the hill range itself. The design efforts detailed on page 29 of the Planning Statement haven't overcome the very damaging impact of the turbines on the landscape and the visual amenity afforded by that landscape. Mitigation has not been effective.

5.0 Landscape Designations and Valued Landscapes

5.1 The development would lie within the Ochils Hill Special Landscape Area (SLA) designated by Clackmannanshire Council and the Ochil Hills Local Landscape Area (LLA) designated by Perth and Kinross but despite its location within the SLA/LLAs the Planning Statement attempts to justify the proposed development on the grounds that: **"The LVIA assessment concludes that as the proposed development is located in an area which has already been altered by existing turbines and would generally be seen as part of an existing wind farm group, that its introduction would not**

significantly alter the overall integrity of these local landscape designations and the qualities for which they have been identified.”

For reasons detailed in this representation, we strongly disagree with this conclusion. It would result in a 60% increase in the size of the Burnfoot Hill/Rhodders wind farm with taller turbines and a damaging impact on significant views thus altering the overall integrity of the local landscape designations, including the Stirling Council LLA from which views of the turbines would be obtained from Dumyat.

6.0 NPF4 Policy 4. Natural Places

6.1 Policy 4d states that:

“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”***

6.2 We do not believe that the Windburn application meets either of the tests above and should therefore be refused. Both the Perth and Kinross Local Landscape Area and the Clackmannanshire Special Landscape Area along with the Stirling Council LLA would experience significant adverse effects that would not be outweighed by the social, environmental or economic benefits of the proposed windfarm.

7.0 Cumulative Impact.

7.1 At the time of writing two other windfarm applications, Brunt Hill and Craighead await determination, one by the ECU (Brunt Hill) and the other by the DPEA (Craighead). There are a number of potential cumulative impacts of these three proposals with each other as well as with the existing windfarms in the Ochils – Green Knowes, the Burnfoot Hill complex of turbines and Lochelbank. This situation is not dissimilar to that which occurred in 2007 when a conjoined public local inquiry was held between 27 February and 4 April to determine four wind farm applications, (Little Law, Mellock Hill, Snowgoat Glen and Lochelbank), each of which was appealed after refusal of planning permission by Perth and Kinross Council.

7.2 The visualisations from Innerdownie (VP03) illustrate the potential cumulative impact of Windburn with existing and proposed windfarms. In a wide arc of view, the viewer would observe a muddled and confused complex of turbines comprising Windburn along with the existing turbines of the Burnfoot Hill windfarms, including Rhodders, plus the full expanse of Green Knowes along with the proposed turbines of Brunt Hill and Craighead (See Figs 10b to 10f). The full cumulative impact of these windfarms needs to be tested rather than each simply being determined independently of each other.

8.0 Impact the Windburn Wind Farm on significant Ochils views and routes.

8.1 Given the nature of the topography of the Ochils, visitors to the hill range enjoy long distance views out across the surrounding countryside. The Windburn proposal would seriously damage one of these views in particular, namely that from Ben Cleuch out towards the northwest. It is a classic view, incorporating a number of very significant mountains, many of them Munros and Corbetts of the Southern Highlands such as Ben Lomond, Ben Ledi, Ben Vorlich, Stuc a’Chroin, Ben More and

Stobinian. Figs 7.8b and 7.8e indicate just how significant would be the impact of the Windburn turbines on this view. The existing turbines of the Burnfoot Hill wind farm complex do not impact on this view to anything like the same extent.

8.2 The western Ochils lend themselves to a variety of hill walks of varying degrees of difficulty. Many of them involve circuits that take one or more of the 9 Donalds in the Ochils with many of the walking routes detailed in a number of guidebooks and on websites including in tops such as Ben Cleuch, Blairdenon, Ben Ever, Mickle Corum. Of particular significance are those tops on an east/west transverse of the Ochils from which the windfarm would highly visible – in fact the wind farm would cut right across this classic high-level walking route.

8.3 Of serious concern is that, for the first time, wind turbines would be visible above the scarp face between Bridge of Allan and Dollar from south of the range. The landscape significance of the scarp face cannot be underestimated. As stated by NatureScot in the National Landscape Character Assessment: Lowland Hills – Central: *“The core area of the Ochils is now a predominantly uninhabited landscape, forming a stunning backdrop to the contrasting farmed and settled floodplains of the Devon and Forth rivers” (SNH).*

8.4 Chapter 7 of Volume 2 of the EIA Report on Landscape and Visual Impact Assessment (LVIA) para 7.87 states that a key visual landscape and visual design objective was to: *“design a layout that reduces visibility of turbines and avoids turbines appearing too numerous and too dominant above the Ochils escarpment in views from the low-lying carseland to the south, whereby the Ochil Hills forms a prominent backdrop to this lower lying landscape”*. It is not a question of reducing the number of turbines viewed above the Ochils escarpment or making them less dominant in order to make them somehow acceptable. They should simply not be visible at all.

8.5 Similarly, it is totally unacceptable that any Windburn turbines should be visible from Dumyat, one of the most popular and iconic tops in the Ochils, climbed by tens of thousands of people per year. Reducing the visibility of the Windburn turbines is not the answer – the turbines should again not be visible at all.

9.0 Peatland Restoration

9.1 Notwithstanding that biodiversity enhancement of the site is required under NPF4 Policy 3b as it is for all national, major developments or those subject to an EIA, we are pleased to note that, if the wind farm were to be approved, there is a commitment to a Habitat Management Plan that would result in the restoration of the degraded peat across the site and beyond. In fact, it was the Friends of the Ochils for whom the Peatland restoration Feasibility Survey of Menstrie and Alva Moss was carried out by Central Environmental Services in 2019. However, we would not wish to see the opportunity for peatland restoration being considered as justification for the approval of this application. Such restoration can be carried out without the windfarm going ahead; it is not dependent on approval.

10.0 Technical Appendix 13.1: Ochil Hills Recreation Usage Survey

10.1 The survey carried out by Parklife Monitoring provides some helpful information on activity levels in the Ochils and attitudes towards wind farms in general. Whilst we are not in a position to comment on the statistical validity of the survey, we trust that the following comments and observations show that the survey has to be interpreted with a degree of caution and not given a significant weighting when determining the application.

- The survey reinforces the point often made by Friends of the Ochils when commenting on other windfarm applications, that the Ochils are a very popular range of hills, readily accessible to a large percentage of Scotland's population. They are very much local hills. The data count provided by the survey reflects this popularity.
- The data also shows that for a number of years there has been a growth in recreational users in the Ochils, as indeed there has been elsewhere with variations to the overall trend resulting from the pandemic and seasonal variations.
- We would advise against drawing too many conclusions about the impact of wind farms on recreational numbers, and on attitudes to existing wind farms in the Ochils shown up by the Recreation Survey. Short answers to the single question: "What are your views on the presence of wind turbines in the Ochils" cannot hope to give a comprehensive insight into attitudes to wind farms. In particular, it is significant that opinion on the Windburn wind farm per se was not sought.

11.0 Conclusion

11.1 Despite the advantage given to wind farm development by NPF4, for the reasons detailed above, we strongly object to the Windburn application and argue that it should be refused. The damage done to the Ochils landscape and the visual amenity enjoyed by the tens of thousands who visit the hill range each year far outweighs the benefits that might accrue from the development.

Yours sincerely

Stuart Dean. Chair, Friends of the Ochils