

Friends of the Ochils



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Energy Consents Unit
Directorate for Energy & Climate Change
The Scottish Government
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15th October 2025

Dear Sir/Madam

Brunt Hill Wind Farm ECU reference ECU00004654 – Comments on amended scheme

1. Introduction

1.1 Having reviewed the Additional Information (AI) for the revised Brunt Hill application for a windfarm of 13 turbines in the Ochils, the Friends of the Ochils (FOTO) maintains its **objection** to the scheme and ask that it is **refused**. We would also ask that this representation is read in conjunction with our representation of 24th June 2024 in which we gave grounds for our objection to the original Brunt Hill proposal. Those grounds substantially remain as we do not feel that the revised scheme and the apparent removal of the objection by Historic Environment Scotland gives justification for approval of the revised scheme. Our original objection was far more than one based on the adverse impacts of the turbines on Kinross House and its designed landscapes and therefore, whilst the reduction in the number of turbines from 18 to 13 and in the horizontal spread of those turbines when viewed from Kinross House has been enough to satisfy Historic Environment Scotland, it doesn't enable us to withdraw our objection.

2. Landscape and Visual Impact

2.1 Comparing the Zone of Theoretical Visibility (ZTV) shown in fig 7.5 (original layout) with the ZTV for the amended layout illustrates that the amended layout will still be highly visible from a wide area of the countryside surrounding the Ochils as well as from many places within the Ochils, in particular many of the popular hill tops such as Ben Cleuch and Innerdownie. The landscape impacts of the new scheme will not therefore be localised, thereby satisfying NPF4 Policy 11 e ii. The mitigation provided by the reduction in the number of turbines and in their horizontal spread when viewed from large swathes of Kinross-shire and elsewhere does not work.

2.2 Views from within the Ochils as illustrated by those from Ben Cleuch in both wireframe and photomontage visualisations 15 d and 15 e for the amended layout and 15e and 15f for the original layout show little change in the cumulative impact of each with Green Knowes and Lochelbank – a little less cluttered but not significantly so. If Craighead were to be added to the mix the cumulative impact of Brunt Hill with other windfarms would be even more significant (see para 3. below).

3. Cumulative Impact with existing and proposed windfarms in the Ochils.

3.1 We would ask that the following comments on cumulative impact of windfarms in the Ochils are read in conjunction with our comments and observations contained in our original objection letter to Brunt Hill, dated 24th June 2024.

3.2 Given that there are now three additional Ochil windfarm applications (Brunt Hill: ECU00004654, Craighead: DPEA PPA-340-2162 and Windburn: ECU00004782) in the system, we would ask that each is determined by taking into account the cumulative impact with the other two and with the existing Ochils windfarms – Green Knowes, Lochelbank and the Burnfoot Hill/Rhodders complex of turbines which we regard as a single operational windfarm.

3.3 Needing to test the cumulative impact of windfarms in the Ochils is not a new situation and we would ask that due cognisance is taken of the conjoined public local inquiry for Little Law, Mellock Hill, Snowgoat Glen and Lochelbank held in 2007. Further detail is given in our original letter of objection to Brunt Hill. As an organisation established to protect the Ochils landscape and its enjoyment by visitors to it we have serious concerns that, without due attention being paid to cumulative impact by both the ECU and the DPEA, the Ochils landscape could become dominated by windfarms.

4. Conclusion

4.1 The amended Brunt Hill Wind Farm application would, as with the original application for 18 turbines, have a serious adverse impact on the special qualities of the sensitive Ochils environment and be contrary to the PKC Landscape Supplementary Guidance 2020. NPF4 does not give grounds for approving the amended application as the impact of turbines of up to 200m goes way beyond the local area.

Yours sincerely

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