

Fossoway and District Community Council Response to ECU00004654 Brunt Hill Wind Farm Planning Application – Objection

The Fossoway and District Community Council (FDCC) are writing to object to the Brunt Hill Wind Farm planning application.

Introduction - Our Community

Fossoway is a semi-rural community of 959 households located within the Perth & Kinross Council area (PKC) and includes the settlements of Blairingone, Powmill, Crook of Devon, Drum, Rumbling Bridge and Carnbo. The settlements have limited infrastructure, but all have uninterrupted views of the Ochil Hills.

The importance of our local landscape was reinforced when we partnered with PKC in Summer 2023 to host a series of Big Place Conversations¹, held in each of our settlements, Fossoway Primary School and Kinross High School using the Place Standard Tool (the reports are available from PKC.)

In all events there was overwhelming agreement that the “views are precious to the community; that is why people live here.” The good connection to nature and tranquil walks that are on our doorstep, together with the uninterrupted views of the Ochils are highly valued by our community.

On learning of the proposals for two wind farms in our district: Brunt Hill and Craighead (the latter is due to be submitted directly to PKC in Summer 2024) and a further site in the Ochil Hills at Windburn Farm, Clackmannanshire, we conducted a survey of all residents to understand their views on further wind farms in the Ochil Hills to the north of our community.

The survey was distributed to all 959 households in the Fossoway District by volunteers. Residents could either complete the survey online or by paper copy dropping them in locations across the district. The survey was open from the 1st to 30th November 2023. FDCC shared the results with the community at a public meeting which was held in Carnbo Village on 30th January 2024 and subsequently published on our website² and social media channels.

The majority of households who responded support renewable energy. Opinions however were divided on onshore wind farms in the Ochil Hills; opponents were concerned about the impact on the landscape and the loss of this especially important local amenity, whilst supporters believing they are essential to halt climate change.

The level of support for onshore windfarms in general dropped from 59.1% to only 45.4% supporting wind farms in the Ochils. As expected, the level of opposition also increased from 28.1% to 45%.

When analysing the results by settlement it was clear that in Carnbo, the closest settlement to the proposed wind farm developments, there are more residents that oppose (60%) the wind farms than support (34%).

¹ <https://www.pkc.gov.uk/article/22957/The-Big-Place-Conversation>

² <https://www.fossoway.org/community-council/wind-farm-survey-report-30-th-january-2024/>

Objection – Contravenes Scottish Government Onshore wind turbines planning advice 28th May 2014 (PAN)³, NPF4 Policy 11 (e) ii & xiii⁴ and PKC LDP2 Policy 33 (a)⁵

We strongly advocate that the addition of a further 18 wind turbines that are significantly taller than any of the current 56 operational turbines will have a significant detrimental effect on the Ochils designated Local Landscape Area and result in the loss of this tranquil local amenity to our residents.

Access to the Ochils for virtually all of our community is within a 20 minute walk, providing the only local area for recreational hill walking. In addition, this will be further compounded if the 23 wind turbines (Craighead and Windburn) in scoping phase were also approved. We believe that approving this application will result in the Ochils becoming a landscape dominated by wind farms as the number of turbines and their height will greatly exceed the carrying capacity of the Ochils.

Furthermore, the 200m turbine height which requires aircraft warning lights will destroy the experience of the night sky in this rural location. It is not only the adverse impact of this local amenity on our community, but it will also change the experience of the dominant Ochils for those as far away as North Berwick who will have sight of 13 to 18 turbines⁶ which equates to over 823,650 people, over 15% of the population in Scotland⁷

The developers themselves agree with the significant impact as they state in Volume 1 – Non-Technical Summary.

6.1.4 The extent of Operational Phase effects upon the landscape character would be limited by the topographic containment of the Ochil Hills. The operational phase would lead to a Significant impact on landscape character of the Ochil Hills unit of the Lowland Hill Ranges landscape character type. There would also be a Significant impact on the Loch Leven unit of the Lowland Basins landscape character type. The turbines of the Proposed Development would be noticeably larger than exists at present within the Ochil Hills.

6.1.8 In terms of the cumulative assessment, the Proposed Development and Craighead would be located adjacent to each other and within the same host landscape. It is likely they would have similar design relationships with each other. The two arrays would be seen together and perceived as a larger single array. The changes identified on landscape character as a result of Brunt Hill would often be similar to those of the combined array with Craighead and would not lead to an increase in the level of impact reported for Brunt Hill alone. Similarly for the visual effects, most of these are also likely to remain similar to those reported for Brunt Hill alone, except for those at Carnbo, Crook of Devon, core paths and summits in Ochil Hills to southwest where there is the potential for some increased levels of impact, depending on the final layout of Craighead.

As a community we recognise the impact of climate change and the requirement for sources of renewable energy. However, the adverse impact on our local landscape and amenity as well as regional and national impact is extreme and there are no local socio-economic benefits. As the developers state there will only be approximately 48 new jobs in PKC overall and only £22m of the £190m development cost will be spent in PKC.

³ <https://www.gov.scot/publications/onshore-wind-turbines-planning-advice/>

⁴ <https://www.gov.scot/publications/national-planning-framework-4/pages/3/>

⁵ <https://www.pkc.gov.uk/article/21301/Supplementary-Guidance-Renewable-Low-Carbon-Energy>

⁶ Application Volume 3 Chapter 7 Figure 7.5

⁷ <https://www.nrscotland.gov.uk/files/statistics/settlements-localities/set-loc-20/set-loc-2020-data.xlsx> Table 2.1, retrieved 1st April 2024.

In addition, it should be noted that the local settlement of Carnbo has no shops, hospitality or other infrastructure and hence will receive no socio-economic benefit from the development. The Carnbo village hall provides a substantial number of opportunities for civic activities bringing together the community which along with the landscape provides a sense of identity and community⁸.

The current operational turbines are well dispersed and whilst some may find them intrusive when walking in the Ochils they can largely be avoided. The addition of up to a further 41 turbines the majority of which will be 200m tall will irreversibly change the landscape when viewing from a distance in all directions and walking this local landscape area. There is no means of mitigating this and hence our objection to the proposal.

In summary the FDCC objects to the Brunt Hill wind farm application on the grounds that it will result in a wind farm landscape and that the developer's mitigation plans are inadequate in several areas.

Objection due to Inadequate Mitigation

- Construction Phase – Traffic and Noise

The settlement of Carnbo has no bus service but does have an extensively used Village Hall, to the east of the village, which has an active Hall Association. There are regular community classes, workshops, and events throughout the year including:

Sewing Club: Thursdays 1-4pm

BBQs: First Sunday in June, July, Aug & Sept

Hall Talks: First Monday in October to March at 7:30 pm

Coffee and Chat: Monthly from October to March at 10am to 12noon

SWRI: Third Monday of every month

Further ad hoc social events throughout the year

In addition, as part of our developing Community Action Plan (led by the Fossoway Community Development Trust⁹) we aim to maximise the use of the Hall and attached bowling green for the benefit of the wider Fossoway Community.

Therefore, the statement made by the developers¹⁰ that no events will be impacted is clearly incorrect.

The proposed access route¹¹ from the A91 for abnormal loads shows the close proximity of both HGVs and abnormal loads to the Village Hall. The FDCC holds regular meetings in the Hall and current road traffic on the A91 is clearly heard hence the HGVs and abnormal loads will be heard and disturb events in the Hall and the residents in the School House adjacent to the Hall.

In addition, the plan does not state the route of non-abnormal traffic. The estimates¹² are 36,972 return trips along the A91 which in month six equates to 168 trips per day, based upon 31 days in a month working weekdays and half day Saturday. Although there is mention of three routes into the site, in practice we believe all the traffic will come from the east or west along the A91. It will either go via the new road round the east of the Hall or via the unclassified road to the west of Schoolhouse, or a split of the two, leaving the Village Hall and residential Schoolhouse in an island.

⁸ <https://www.gov.scot/publications/scottish-government-planning-guidance-local-living-20-minute-neighbourhoods/documents/>

⁹ <https://fossowaytrust.com/>

¹⁰ Application Volume 2 Chapter 14, Section 14.4.21

¹¹ Application Volume 4 Appendix 13.1, Page 22

¹² Application Volume 2 Chapter 13, Table 13.8

In addition, we believe that many HGVs will travel from the West over the Clackmannanshire Bridge and then via the A977 passing through Blairingone, Powmill and either Rumbling Bridge or Crook of Devon depending on chosen route. From here there are several options including many single-track roads such as Gelvan Moor Road linking the A977 and A91. As a rural community with many farms that have a reliance on access to these roads on a daily occurrence to transport livestock, feed and crops using tractors with trailers the impact on them conducting their daily work will be severe.

During the construction phase there will be a significant increase in heavy traffic through these settlements. We also note that these latter routes were not included in the traffic count survey and suggest this omission should be corrected. The route through Rumbling Bridge using the A823 is particularly hazardous requiring the crossing of the River Devon Gorge Bridge which is single track with limited visibility. The Old Fossoway Bridge to the East of Yetts o' Muckhart on the A91 has the same problems and has only just been repaired following a vehicle colliding with it requiring an extended complete road closure of the A91.

Further, the unclassified road to the west of Schoolhouse would not be suited to the additional loads. It is single track and would require HGVs and longer vehicles to cross the centre of the A91 to be able to swing round the corner. Carnbo residents have already seen this issue with the present traffic as tractors have got longer. Presently the speed limit in front of the Hall and Schoolhouse is 60mph. Due to length of the straight it is common for people to overtake outside the Hall where the unclassified road joins the A91. We are deeply concerned that the close proximity of three entrances on to the A91 and the significant increase in traffic is dangerous to both residents and other road users.

Finally, there is a suggestion¹³ that abnormal load access could be from the west via the B934 through Dunning Glen. This is a narrow road which barely allows two cars to pass each other, and we would strongly suggest that this is unsuitable for construction traffic.

In summary the mitigation proposed in Volume 2 Chapter 18 is inadequate and contravenes the IEMA guidelines that the applicant states they have adhered to in Volume 2 Chapter 13. We would also seek an assurance that all HGVs and abnormal loads adhere to Traffic Scotland's Rural Driving Guide for Freight¹⁴. This guidance notes that "moving through rural areas can have a large impact on the environment through road noise, vibration and visual intrusion." As many of our settlements have roadside dwellings, residents are concerned regarding the impact of this significant increase in HGVs on the stability of their property and want to know who will fund, in a timely manner, the inevitable repairs to roads that will be required.

In summary we propose that further analysis of HGV traffic routes is required with the addition of a noise impact study. In addition, there should be a requirement for the Clerk of Works to communicate directly with a representative from the Carnbo Village Hall Association and FDCC to ensure outdoor events are not disturbed. The Traffic Management Plan¹⁵ should be discussed and agreed with FDCC who have local knowledge of the area.

In addition, it is the FDCC's view that should this application be approved a Compensation Fund for disturbance to the Carnbo community should be made available as a condition of the consent, with the amount and scope for distribution agreed with the FDCC.

¹³ Application Volume 4 Appendix 4.1, Section 4.6.5

¹⁴ <https://www.transport.gov.scot/media/46448/rural-driving-guide.pdf>

¹⁵ Application Volume 4 Appendix 4.1, Section 51.1

- Impact on Wildlife and the Environment

The Ochil Hills have an abundance of wildlife which requires safeguarding during construction, operation, and decommissioning. The Ornithological Survey¹⁶ showed a Goshawk nesting location with a chick within the site. This area should be safeguarded. The proposed mitigation¹⁷ which relies on the Environmental Clerk of Works to identify new nesting site(s) and then place an exclusion work zone is inadequate. The past nesting area is known, and this should be safeguarded.

We note that *Viscaria vulgaris*, the sticky catchfly, a nationally rare species, has been found in the Ochils at Dumyat¹⁸ and we request that a specific search is made for this rare flower and if found a stringent plan for its safeguarding be developed.

It is noted that there were six species/genera of bat detected at the site, most of which will fall into the high turbine collision risk category. The proposed mitigation does not comply with the recommended mitigation strategies of the Bat Conservation Trust who were involved in research into the impacts of wind farms on bats in the UK¹⁹.

As red squirrels are a protected species and have been found on the site, we would propose that mitigation is strengthened and that the FCS Guidance Note 33: Forest operations and red squirrels: November 2006²⁰ is fully adopted.

We recognise that a model for bird collision has shown that it is unlikely, however when considering the scarcity of some of the raptor species, we propose that additional mitigation steps should be taken. A brief review has identified several studies using sonic fields which have been successful in deterring birds from entering the rotor swept area²¹.

With regard to environmental impact, we are concerned that during construction and decommissioning phosphates and nitrates may be released into the already contaminated Loch Leven²². Currently there is no mitigation in place for this. Monitoring is after the affect and is not an adequate mitigation.

Finally, we request a section on fire risk in the site and mitigation plans, to ensure the safety of local residents, as in 2023 there were several open land fires in Scotland. We would propose that advice is sought from Forestry and Land Scotland.

- Safeguarding Local Cultural Heritage

It is essential that critical elements of our local cultural heritage are adequately safeguarded as directed in the Scottish Government Planning and Advice Note 2: Planning and Archaeology²³.

The EIA focuses primarily on designated heritage assets out with the application boundary, whilst making little recognition of non-designated historical assets within the site boundary, particularly those recorded on Perth and Kinross Historic Environment Record sometimes referred to as Sites and Monuments Record (SMR), which make up a sizeable proportion of our local heritage²⁴.

¹⁶ Application Volume 4 Appendix 10.1

¹⁷ Application Volume 2 Chapter 18, Page14

¹⁸ <https://www.nature.scot/rare-plant-thriving-ochils-crags>

¹⁹ <https://www.bats.org.uk/about-bats/threats-to-bats/wind-farms-and-wind-turbines>

²⁰ <https://www.forestry.gov.scot/images/corporate/pdf/Guidancenote33Redsquirrel.pdf>

²¹ <https://rewi.org/resources/dtbird-technical-report/>

²² https://www.pkc.gov.uk/media/37575/Loch-Leven-SPG-Final-2016/pdf/Loch_Leven_SPG_Final_2016

²³ <https://www.gov.scot/publications/pan-2-2011-planning-archaeology/>

²⁴ <https://www.pkht.org.uk/pkher/>

There are a number of sensitive assets within the site which are non-designated and hold particular cultural significance both locally and nationally. More information on these assets can be provided by FDCC. This collection of heritage assets concisely and intensely capture life in the Ochil Hills and in Fossoway at either side of the agricultural revolution and are particularly sensitive; their history is relevant to the cultural significance of not just local people in Fossoway and Kinross but broader communities on a national level. Their existence and preservation provide a benefit to current and future generations.

With the current mitigation plans the assets are at particular risk, being sited within designated buffer zones for construction and near the proposed excavated access tracks. We therefore consider that the current mitigation actions are not strong enough and that clear constraints to the development are applied by way of conditions for Reporting prior to development and Watching Brief during development conducted by a professionally competent archaeological organisation. This would apply to areas of the development that are both designated AND non-designated heritage assets.

In regard to Reporting prior to construction this should include the survey, excavation, recording and analysis of any known designated as well as non-designated archaeological remains and publication of results.

In regard to Watching Brief during the course of construction this would include any areas of access roads, tracks, service trenches, borrow pits and so forth that are within the vicinity of any designated or undesignated historical assets and provision for appropriate recording of such work, analysis and publication of results.

We would also request that the heritage assets of Cairnbo Stewart, Eastside, the Waterhead Bridges and Witches Knowe are scheduled and designated as a collective by Historic Environment Scotland to ensure their protection for the enjoyment of current and future generations.

- No Assessment of Impact on Local Businesses

Within the local area there are four businesses that operate gliders, microlites, balloons, light aircraft and helicopter rides, and pilot training:

Balado Airfield - <https://baladoairfield.co.uk/>

Adventure Aviation - <https://www.adventureaviation.co.uk/>

Scottish Gliding Centre <https://scottishglidingcentre.co.uk/>

Webster Adventures <https://websteradventures.com/>

We can find no evidence in the EIA reports that an impact analysis has been carried out on these businesses, and hence there is no mitigation in place. We believe that this should be included.

In summary, we believe that the proposed mitigation plans are inadequate in manner areas and that there should be further work before any decision is made.