

Fossoway and District Community Council Response to 24/01193/FLM Craighead Wind Farm Planning Application – Objection

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

Introduction - Our Community

Fossoway is a semi-rural community of 959 households 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.

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 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 8 wind turbines which are significantly taller than any of the current 56 operational turbines will have a significant and 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 effect will be further compounded if the 33 wind turbines (Brunthill and Windburn) in scoping or application 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 mix of 3x180m and 5x200m 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 45km.

The developers themselves agree with the significant impact as they state in their Report:⁶

6.7.2.1 – 6.7.2.4 The Developer admits that the wind farms will be ‘visible across large swathes’ of the Ochil Hills and that the ‘Brunt Hill scheme would intensify development on the hills,’ and that the two developments would appear to be ‘integrated’ and would be seen as a ‘single larger wind farm.’

Detrimental 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/>

The Craighead Economic Impact Report⁷ states that an impact assessment will be made of ‘any other recreational features within the Study Area.’

Furthermore⁸ the Report states that ‘the criteria used to assess the effects on recreation is qualitative and has been based on any estimated changes to recreational facilities in the local area. This includes changes in the accessibility and amenity of recreational receptors, which for this assessment will include core paths, cycle routes and other recreational activities.’

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 Craighead Volume 1 EIA Report Chapter 6: Landscape and Visual Impact Assessment

⁷ Craighead Economic Impact Report section 13.3.4

⁸ Craighead Economic Impact Report section 13.3.6.3

However, despite this there has been no assessment of impact on these local businesses. We are aware that the Scottish Gliding Centre in their response anticipate an annual loss of £150,000 which over a 40-year period, the proposed lifetime of the wind farm, would equate to £6m. This means that almost all of the socio-economic benefit envisaged by the developers in their Craighead Economic Impact Report⁹ is likely to be wiped out by loss of business to those companies that rely on access to the Ochil Hills.

The Craighead Economic Impact Report suggests that:

- Up to £9.1 million is anticipated to be spent within the local economy across the construction and operational phases;
- Up to 66 jobs will be created across Perth and Kinross;
- Up to £3.9 million in LVA is anticipated to be contributed to the local economy.

In addition, it should be noted that the local settlement of Carnbo has no shops, hospitality or other such 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 creates a sense of identity and community¹⁰.

The current operational turbines are well dispersed and whilst some may find them intrusive when walking in the Ochils they can largely be avoided. Whilst we acknowledge that this current application is for only eight turbines, we strongly believe that it must be regarded together with the Brunthill application for 23 turbines as they will be seen visually as a single wind farm. The addition of up to a further 41 turbines, across the three proposals, the majority of which will be 200m tall, will irreversibly change the landscape when viewed from a distance in all directions and while walking in this local landscape area. There is no means of mitigating this and hence why we are objecting to this proposal.

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. In addition, we have serious concerns about the detrimental impact on the income of local businesses that rely on the Ochil Hills for their operation.

Objection due to Inadequate Mitigation

In several chapters the Developer has failed to provide mitigation or management plans. For example, there is no Construction Environmental Management Plan (CEMP) included in the submission. It is stated that this will be provided following planning approval, but it is necessary to have sight of this document now to ensure that appropriate mitigation to protect the environment at the time of the grant of planning permission is implemented during construction. We do recognise that the Developer has offered a construction fund to compensate local communities for inconvenience.

⁹ Craighead Economic Impact Report section 13

¹⁰ <https://www.gov.scot/publications/scottish-government-planning-guidance-local-living-20-minute-neighbourhoods/documents/>

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, August and September

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 Trust¹¹) we aim to maximise the use of the Hall and attached bowling green for the benefit of the wider Fossoway Community.

The proposed access route¹² from the A91 for abnormal loads shows HGVs and abnormal loads travelling past the Village Hall, before turning onto the new access track. The estimates¹³ are 6,926 return HGV trips along the A91 which in month five (peak) will be 1,612 return HGV trips.

Although there is mention of several 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 the Schoolhouse, or a split of the two, leaving the Village Hall and residential Schoolhouse in an island.

The villagers use the existing pathway to walk from the village to the Hall and the additional HGV traffic will create a significant safety risk. We are further concerned by the fact that the Developer states that a route access report will not be available prior to a decision on their planning application.

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 their chosen route. From here there are several options linking the A977 and A91, but many are single-track roads such as Gelvan Moor Road.

The FDCC has also received representation from a local farmer who jointly owns the current access track that is intended to connect the A91 to the planned site. They have advised that they have not given permission for use of this track which is not referenced in any part of the planning application.

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.

In summary Carnbo residents already have issues with the present traffic on the A91 and road safety is a standing agenda item at meetings of the FDCC. Presently the speed limit in front of the Hall and Schoolhouse is 60mph. Due to the 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 the proposed entrances for Craighead and Brunthill wind farms from

¹¹ <https://fossowaytrust.com/>

¹² Application Access Statement Section 2

¹³ Application Volume 1, Chapter 12, Section 12.5

the A91 and the significant increase in traffic will be dangerous to both residents and other road users.

In summary the mitigation proposed¹⁴ is inadequate. We propose that further analysis of HGV traffic routes as well as a proposal for an alternative access track 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 residents can safely walk to the Hall, especially when there are major events there. The Traffic Management Plan¹⁵ should be discussed and agreed with FDCC who have local knowledge of the area.

Impact on Wildlife and the Environment

The Ochil Hills have an abundance of wildlife which requires safeguarding during construction, operation, and decommissioning.

The Ornithological report¹⁶ showed a Goshawk nesting location within the study area and we would request that this area be safeguarded.

Viscaria vulgaris, the sticky catchfly, which is a nationally rare species, has been found in the Ochils at Dumyat¹⁷ and we request that a specific search be 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 Brunt Hill wind farm Bat Survey Report was used as reference for this application, but the presence of the Noctule species is not mentioned in the EIA or Bat Report from this application as being rare in this area of Scotland, as it was in the Brunt Hill Report. This species is of National significance. It is once again mentioned that mitigation will be considered in a CEMP after consent. The FDCC requests an assurance that the proposed mitigation complies 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 UK¹⁸.

There are signs of badger, otter, water vole, pine marten, brown hare, and red squirrel within the site area. These are all protected species which will potentially suffer habitat loss and/or be displaced without a CEMP or site of Species Protection Plans it is challenging to determine if mitigation actions are robust.

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. It is unfortunate that there have been few studies which show the true effect of bird or bat collisions with turbines, however it is a risk and given the volume of bird movements within the site area and the proximity to Loch Leven SSSI and RSPB Nature Reserve, possible mitigation measures might include colouring one of the turbine blades black, as this was shown in a study in Norway to reduce bird deaths by 70%. Also, a brief review identified several studies using sonic fields which have been successful in deterring birds from entering

¹⁴ Application Volume 1, Chapter 12 Traffic and Transport

¹⁵ Application Volume 2, Chapter 12, Appendix 1

¹⁶ Ornithology Vol. 1 Chapter 10, section 10.9.1.1

¹⁷ <https://www.nature.scot/rare-plant-thriving-ochils-crags>

¹⁸ <https://www.bats.org.uk/about-bats/threats-to-bats/wind-farms-and-wind-turbines>

the rotor swept area¹⁹. Further collision risk from any potential overhead power lines should also be considered and included in any cumulative effect from all operational and proposed wind farms. This cumulative effect would also cause a barrier effect which could affect survival and breeding success.

With regard to environmental impact, we are concerned that during construction and decommissioning phosphates and nitrates may be released into the already contaminated Loch Leven²⁰. We acknowledge that the Developer states that there will be no increase in wastewater and that water from the staff welfare cabins will be captured in a closed system²¹ but we are concerned that water will be used during construction, e.g., wheel washing and there is no management of pollution plan. The site contains some steep slopes from which it will be difficult to contain the run-off from the construction site drainage. This also has the capacity to affect the South Queich burn. There are Groundwater Dependent Terrestrial Ecosystems within the site area which are considered sensitive. Sight of a Pollution Prevention Plan and a Habitats Management Plan would be useful to ascertain what mitigation might be put in place.

Mention must be made of the effect of the re-use of excavated peat on the site. The outline Peat Management Plan states the re-use of excavated peat will be for re-dressing track, crane pad and hardstanding verges. However, in the Hydrology Report²² it states, '*any surplus peat following redressing can be used to reinstate existing drainage ditches that would become redundant following construction*'. It is therefore unclear as to the estimated volumes of peat to be extracted and re-used on site, and where it is to be re-used. Further there are no justifications for any suggested ecological benefit. The PKC Local Development Plan²³ states that '*the Council is committed to ensuring that a development avoids disturbance to, and the loss of, carbon rich soils, including peatland, which are of value as carbon stores*'.

The Planning Statement²⁴ states that there will be up to two borrow pits on the site. There appears to be no further mention of any borrow pits or their location, quantity and composition of possible aggregate, waste removal etc, which could all have an adverse environmental impact within the site.

NPF4 Policy 2²⁵ states the intent to protect biodiversity, reverse biodiversity loss, deliver positive effects from development, and strengthen nature networks. The LDPs should protect, conserve, restore and enhance biodiversity in line with the mitigation hierarchy.

The Scottish Biodiversity Strategy to 2045²⁶ aims to tackle the nature emergency; to be nature positive, halting biodiversity loss by 2030 and to have restored and regenerated it across the country by 2045.

In summary as there is currently no CEMP it is proposed that the mitigation summary²⁷ provides insufficient information. It is also proposed that a Pollution Prevention Plan, Species Protection

¹⁹ <https://rewi.org/resources/dtbird-technical-report/>

²⁰ https://www.pkc.gov.uk/media/37575/Loch-Leven-SPG-Final-2016/pdf/Loch_Leven_SPG_Final_2016

²¹ Craighead Volume1, Chapter 9 Ecology section 9.7.1.3

²² Craighead Volume 1, Chapter 11 Hydrology Report 11.10.2 - Mitigation during Construction)

²³ PKC LDP Policy 51Soils

²⁴ Craighead Planning Statement section 1.4.1

²⁵ <https://www.gov.scot/publications/national-planning-framework-4/>

²⁶ <https://www.gov.scot/publications/scottish-biodiversity-strategy-2045-tackling-nature-emergency-scotland/>

²⁷ Craighead Volume 1, Chapter 17 Summary of Mitigation

Plan and Habitats Management Plan be produced and approved by Perth and Kinross Council in discussion with Nature Scotland prior to any construction. It would be helpful to have sight of these various plans prior to any decision being made on this application, to ensure that all measures which can be undertaken to safeguard and protect the numerous protected species, bats and birds that are currently within or utilising this area will be taken.

Conclusion

In conclusion the FDCC objects to the Craighead wind farm application on the grounds that it will result in a wind farm landscape, have a detrimental impact on local businesses and that the developer's mitigation plans are inadequate in several areas.