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15<sup>th</sup> July 2025

Dear Sir/Madam,

**Re: Application for the proposed Glen Lednock Wind Farm  
ECU00004966**

Thank you for the opportunity to respond to this planning application.

### Introduction

1. Glen Lednock Wind Farm Ltd, a subsidiary of Low Carbon, part of the Oxygen Conservation Group (of which another subsidiary is the site landowner) has submitted an application for a wind farm of 19 turbines of 180-200m blade-tip height (99-119m hub height) on rolling upland moorland between Loch Tay and Loch Earn.
2. Mountaineering Scotland **objects** to the proposed wind farm development on grounds of:
  - a. Visual impact on the nationally significant and very popular Munros and other hills surrounding the proposed site, with adverse impact being experienced on hills as far as 25km distant.
  - b. Visual impact on the popular rock climbing and bouldering venues in Glen Lednock itself.

### Mountaineering Scotland

3. Mountaineering Scotland is a membership organisation with more than 16,000 members and is the only nationally recognised representative organisation for hill walkers, climbers,

mountaineers and snow-sports tourers who live in Scotland and/or enjoy Scotland's mountains. We represent, support and promote Scottish mountaineering, and provide training and information to mountain users for safety, self-reliance and the enjoyment of the mountain environment.

## Policy

4. There is no dispute between the applicant and Mountaineering Scotland on the importance of climate change and the significance that both UK and Scottish governments attach to increasing renewable electricity generation capacity. It is acknowledged that *NPF4* and other Scottish government policies and strategies such as the *Onshore Wind Policy Statement (2022)* and the *Draft Energy Strategy & Just Transition Plan (2023)* are highly supportive of onshore wind development. Furthermore, *NPF4* gives renewable energy developments 'National Development' status which means the principle of such development, the 'needs case', is taken as established.
5. Notwithstanding this strong policy support for onshore wind, both *NPF4* (page 7) and the *OWPS* (para 3.6.1) reiterate the principal from previous policy that the goal is the right development in the right place. It is Mountaineering Scotland's view that this site in Glen Lednock is not the right place for a wind farm of this size and scale. We have come to this conclusion based on an assessment of visual impact and the knowledge that very popular hills and climbing crags surround the site, at distances close enough to experience significant detrimental visual impact, consequentially diminishing the quality of hillwalking and rock-climbing experience. This is expanded upon below.
6. Glen Lednock Wind Farm fails to meet *NPF4* Policy 11.e.ii. The impact would not be 'localised' and no design mitigation can diminish the prominence of tall turbines sited on such a high-altitude location. As Figures 2.12a and 2.12b show, design tweaks may make the layout more compact and even hide the development from lower altitudes, but it would be no less visually impactful when viewed from upland locations. The detrimental visual impact of this development would be significant enough to outweigh the benefits claimed for the development.
7. There is nothing in current national policy that seeks to promote development in inappropriate locations and a small number of proposed wind developments have indeed been refused consent since the introduction of *NPF4*. Not every individual proposed onshore wind farm is mission-critical for the achievement of national policy goals given the context of extensive unbuilt consented capacity, a steady and substantial stream of new proposals seeking consent, and an equally substantial stream of proposals seeking scoping opinion coming forward.<sup>1</sup> Many

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<sup>1</sup> At December 2024 there was 1.4GW of onshore wind under construction, 5.4GW consented awaiting construction, and 8.1GW in planning awaiting decision. The corresponding figures for offshore wind are 1.3, 2.3 and 12.8. (Scottish Government *Energy Statistics for Scotland Q4 2024*)

alternatives to the proposed development are coming forward in less damaging locations. Though the applicant seeks to suggest, in common with the renewables industry as a whole, that the problem lies with the consenting process (Planning Statement para 4.6.7ff; EIAR 5 para 5.3.33 ff), the data suggests that post-consent investment decision-making and construction are the key bottlenecks.

8. The proposed development promises a range of benefits beyond simply generating electricity. These should be afforded little or no weight, not because they are unimportant but because they are an accompaniment to any onshore wind development in Scotland. All construction generates some economic activity and it is exceptionally rare for a wind farm proposal not to provide the government-recommended 'community benefit' payments. Ecological enhancement is a mandatory requirement for all development under NPF4 so all proposals must comply. Such enhancement and restoration may be very welcome, and Mountaineering Scotland finds much to commend in the Invergeldie Estate Masterplan, but it need not and must not be achieved at the expense of a severe impairment of visual amenity arising from a poorly located wind farm in a very popular landscape. At a Scottish level all these positives are gained no matter where development takes place. Realising them depends on a continuing flow of projects, which there demonstrably is, not on every single proposed project being consented.
9. In government policy, strategic significance has been attached to onshore wind development, not least through designation of the sector as National Development. It is, however, the sector as a whole to which strategic significance attaches, not to any individual proposal unless there were to be a shortage of proposals, which there is not.
10. There is no requirement in policy, nor is it necessary for addressing the climate emergency, to consent development proposals that are not acceptable in planning terms. Mountaineering Scotland submits that the proposed development is not acceptable in planning terms - the visual detriment substantially outweighs the benefits - and therefore consent should be refused.

## **Landscape and Visual Impact**

### **Preamble**

11. For all the appearance of objectivity, professional landscape and visual impact assessments are ultimately subjective judgements. In Mountaineering Scotland's experience, assessments commissioned by developers downplay the impact of proposed development upon the mountaineering experience. Mountaineering Scotland, with an assessment team composed of, informed by and representing experienced 'consumers' of mountain landscapes, believes its judgement of impact provides a complementary and equally valid perspective.

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<https://www.gov.scot/publications/energy-statistics-for-scotland-q4-2024/> accessed 26-4-2025). On any reading this is a substantial pipeline and it has been increasing in recent years.

12. Mountaineering Scotland is focussed on its members' interests: the enjoyment of mountaineering (which includes hillwalking and rock climbing) in a high-quality upland environment. Hence its main concern in relation to wind farms is adverse impact upon visual amenity, in this case upon hillwalkers on the many popular hills around the proposed development and upon climbers on the popular crags and boulders of Glen Lednock.
13. It is noted that, in common with most recent applications, the baseline photography often does not illustrate the 'worst case' scenario of clear visibility, without haze or low cloud, and could give a misleading impression of the visibility of the site and of just how visible and prominent turbines of the size proposed actually can be in clear atmospheric conditions.

### Assessment

14. The proposed development site itself, within a landscape of rolling hills and ridges with craggy outcrops, is of limited mountaineering interest, though it does include the Graham<sup>2</sup> of Creag Ruadh (712m), the summit of which is the highest point in the block of upland bounded by Glens Lednock and Ogle and Lochs Earn and Tay, except for a similar height summit 10km to the west west above Glen Ogle. The nearest turbine to Creag Ruadh would be within c.600m and about 110m higher than the summit. On the west side, Glentarken's nearest turbine would be within c.600m and about 130m higher than the summit, while a borrow pit search area is shown as occupying most of the area between that turbine and the summit.
15. Mountaineering Scotland's substantive interest in relation to Glen Lednock Wind Farm is the views to the site from elevated locations in all directions at distances of up to 25km. Many of these elevated locations lie within locally or nationally designated landscapes recognised for their quality. For the avoidance of doubt, Mountaineering Scotland's assessment is restricted to the visual amenity experienced from the mountain landscapes and consequential impacts upon the quality of mountaineering experience. It does not extend to assessing impacts on the qualities of designated or otherwise defined areas in themselves.
16. The table below assesses the visual impact at those viewpoints relevant to mountaineering interests. It should be noted that as well as the EIAR viewpoints there are many other hills of significance near to the proposed site. These include Creag Each (672m, Graham, c.4km SW), Creag Uchdag (879m, Corbett<sup>3</sup>, c.3km NE), and numerous hills proxied by viewpoints (e.g. Creag MacRanaich (Corbett) proxied by Meall an t-Seallaidh (VP15)).
17. The presentation of the LVIA assessment appears most peculiar. The LVIA states: "Viewpoint analysis has been undertaken from a total of 24 representative viewpoints. Viewpoints 25-29 are illustrative viewpoints to demonstrate a particular concern, but do not require detailed assessment." (Para 6.7.2) Table 6.7 provides judgements on the scale of effect at the 24 representative viewpoints and Appendix A6.4 provides a description of the predicted change at

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<sup>2</sup> Hills of 600-762m OD

<sup>3</sup> Hills of 762-914m OD

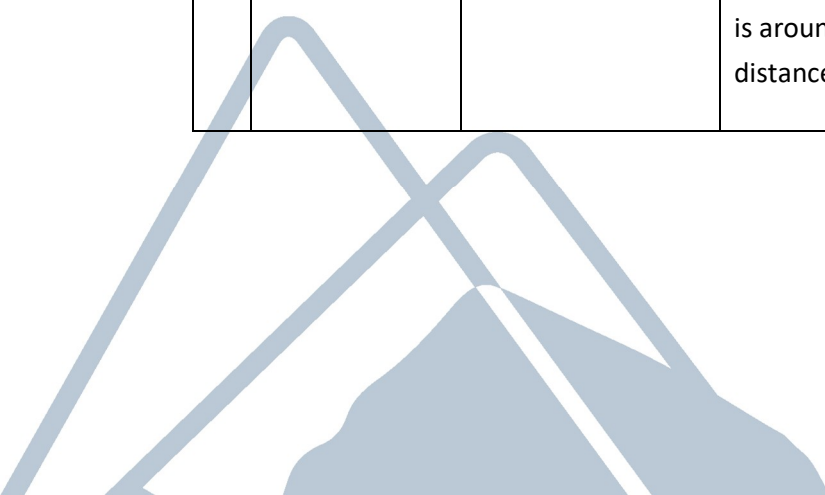
each, but neither presents judgements of level of effect or significance. Table 6.15 contains judgements of level of effect and significance but only for seven of the representative viewpoints. Of the 16 representative and four illustrative viewpoints relevant to our assessment, judgements of level of effect and significance for 10 representative viewpoints can be found in or inferred from the text of Chapter 6. No judgement is provided in the LVIA for six of the representative viewpoints of interest (VPs 7, 15, 18, 19, 23, 24). Mountaineering Scotland cannot recollect previously encountering such an incoherent and incomplete approach to the presentation of LVIA judgements.

Viewpoint (nearest turbine)	LVIA assessment (daylight)	Mountaineering Scotland assessment	
<b>To the east and southeast</b>			
1	Core Path CMRI/16 (3km)	Major, Significant	<b>Agree.</b> The turbines would appear overbearing from the upper glen at the VP and even more dominant at Loch Lednock and from the slopes rising to the Corbett of Creag Uchdag.
6	Ben Chonzie (6.9km)	Major/moderate, Significant	<b>Understated.</b> There is nothing 'moderate' about the impact. The turbines would foreground one of Scotland's most recognisable mountain views of the twin tops of Ben More and Stob Binnein. Turbines backclothed by darker moor do not need to break the skyline to be intrusive and dissonant.
7	Carn Chois (8.6km)		The visual impact is understated in the photomontage because of (1) atmospheric haze and (2) cloud obscuring the distant hills (such as Ben Lui, which clearly visible in the baseline photography for nearby VP6). The impact and significance would be similar to that at VP6.
26	Creagan na Beinne (8.7km)		Although only three blades and one tip would be visible, this would alter perceptions of wildness and remoteness by appearing from within the hills rather than marginal to them.
23	Kinpauch Hill (28km)		Glen Lednock Wind Farm would appear to be well into the interior of the Southern Highlands, in contrast to the closer but clearly 'exterior' Braes of Doune and Strathallan. The baseline photography is hazy and

			downplays the visibility of large turbines even at a distance such as this.
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<b>To the north and northwest</b>			
2	Rob Roy Way near Meall Odhar (4.4km)	Moderate/minor, Not significant	<b>Accepted</b> for the specific VP. <b>But</b> a viewpoint on the Rob Roy Way higher up the track would have shown greater turbine visibility and one on the nearby Graham of Creag Gharbh (a not infrequent packless detour from the RRW for its superb view over Loch Tay) still greater visibility (7-12 hubs), with a corresponding increase in impact and significance.
12	Ben Lawers road (11.7km)	Major/moderate, Significant	<b>Understated.</b> There is nothing 'moderate' about the impact, which would be exacerbated by the turbines appearing high above the observer. Instead of turbines being 'beyond' the hills and only seen as height is gained, they would appear to be in the hills, visually door-stepping the premier range of the Southern Highlands. The turbines appear unrealistically faint in the photomontage.
13	Ben Lawers (11.9km)	Major/moderate, Significant	<b>Understated.</b> There is nothing 'moderate' about the impact. The visual impact on most of the Lawers-Tarmachan range is substantial and not limited to the summits. The turbines would be repeatedly in view, and sometimes close to constantly depending on the chosen route. The towers and moving rotors would appear in the same angle of view (c.25 degrees) as Ben Vorlich, competing for visual attention. Other windfarms are clearly seen, on the wirelines and in the field, as being at or towards the edge of the Southern Highlands. Glen Lednock Wind Farm would appear unequivocally as being intrusively within the Southern Highlands.
14	Meall Garbh (13.1km)	Major/moderate, Significant	<b>Agree.</b> The towers and moving rotors would appear in the same angle of view as Ben Vorlich, competing for visual attention, albeit to a slightly lesser degree than viewed from Ben Lawers (c.35 compared with 25 degrees). The turbines would appear as a kinetic

			intrusion well inside the Southern Highlands compared with the existing pattern of development. The turbines appear unrealistically faint in the photomontage (cf VP13 at a not dissimilar distance in different atmospheric conditions).
27	Meall Liath (B Lawers NNR) (11.6km)		The impact would be exacerbated by the turbines appearing high above the observer. Instead of turbines being 'beyond' the hills and only seen as height is gained, they would appear to be in the hills, visually door-stepping the premier range of the Southern Highlands.
18	Bheinn Bhreac (18km)		Glen Lednock Wind Farm would intrude into an otherwise anonymous area of rolling upland moorland as the eye swings from the Lawers range across Ben Chonzie to Ben Vorlich (and continuing to Ben More). The photomontage understates the impact because snow-covered ground effectively camouflages pale turbines.
19	Meall Ghaordaidh (19km)		Assessment as VP18 but Glen Lednock Wind Farm would appear in the same field of view as the Tarmachan range and note also the level of backclothing which would increase the visibility of blade movement.
21	Schiehallion (24km)	Moderate/minor, Not significant	Although <b>understated</b> , it is <b>agreed</b> that at the distance the effect would be only marginally significant even if baseline photography not taken towards the sun was used to give a more realistic impression. However, there would be a clear sense of intrusion into the hills rather than, as the baseline photography shows, on the edge like Griffin Wind Farm. While it is true that "There would only be visibility ... from the summit ridge" (Para 6.7.151), this is around 3km long and constitutes around half of the distance from the car park to the summit.



**To the southwest and south**

25	Loch Boltachan (1.5km)		Wireline 25b is incorrect, missing off the most impactful turbine seen from hub height. The impact of even a single turbine looming, half-hidden, over the viewer at close range can be substantial, eliminating any perception of remoteness or wildness.
5	Mor Bheinn (6.6km)	Major/moderate, Significant	<b>Understated</b> because of Glen Lednock Wind Farm's appearing between the viewer and the Lawers range on a view <i>into</i> the Southern Highlands.
11	Ben Vorlich (10.6km)	Major/moderate, Significant	<b>Understated.</b> There is nothing 'moderate' about the impact. Atmospheric haze and cloud enables the photomontage to downplay the impact of a spread of towers and moving rotors contrasting with dark moorland in the same visual field as the Lawers range. From Ben Lawers to the northernmost turbine would be less than 25 degrees and to the southernmost turbine less than 45 degrees. It is simply not correct to say turbines "would not appear in views of Ben Lawers" (Para 6.7.141) unless blinkers are involved. Haze and cloud also diminish the true impact on views across the proposed wind farm to Creag Uchdag and Ben Chonzie in clear conditions, when they would intrude directly and distractingly.
15	Meall an t-Seallaidh (15km)		Viewers would experience insistent visibility of moving turbines, contrasting with the moorland, in the same field of view as their focus when looking along Loch Earn or to Ben Lawers. The proposed development would sit in front of Ben Chonzie (obscured by cloud in the photography). The photomontage gives a misleading impression because of haze and cloud.
22	Ben More (25km)	Moderate/minor, Not significant	<b>Understated.</b> It is closer to Moderate and Significant notwithstanding the distance involved. While it is accepted that Glen Lednock Wind Farm would be seen within a relatively broad area of subdued landscape, it would flank the view down Loch Tay with the other flank being the Tarmachan-Lawers range. This would draw attention to what would otherwise be a recessive area of



			landscape and distract from the spectacular, hill-flanked view along Loch Tay. While the wirelines suggest a wider context of wind farms, in reality they can rarely be seen and even when visible appear as a small smudge or sticks in the distance, clearly outwith the Southern Highlands. Hence Glen Lednock Wind Farm would appear as a major incursion. The snowy photomontage understates the impact by camouflaging pale turbines.
29	Ben Ledi (23km)		Although in practice only one hub and one blade would be noticeable, this would alter perceptions of remoteness and wildness by appearing within the hills rather than marginal to them.
24	Ben Lomond (40km)		Glen Lednock Wind Farm would be seen as very substantial leap forward of development into the Southern Highlands compared with other visible wind farms sited on the edge or beyond (cf Braes of Doune, with 100m BTH turbines, visible in the baseline photography).

18. The proposed development would form a new focal point in the landscape, clearly visible and prominent because of its high altitude. This would have significant effects on landscape character and visual amenity would not be localised in nature. LVIAs, as here, usually overstate the extent to which impact diminishes with distance and that has become more pronounced following NPF4's stating that 'localised' impacts were acceptable (Policy 11.e.ii). In Mountaineering Scotland's experience, 'localised' appears to be a highly flexible word in the hands of landscape architects. The same might be said of 'plateau' which landscape architects appear to recognise in all types of landscapes where Mountaineering Scotland's experienced assessors see undulating hills. There *are* 'plateau landscapes' in Scotland but this site is not one of them. It should also be noted that turbines are much larger than previously and, in the experience of Mountaineering Scotland, more overtly visible at greater distances.
19. The size of the turbines also contributes to their overwhelming of the topography of the modest hill-top beside which they are sited. The potential visual impact upon hillwalkers would be substantial. The two highest altitude turbines are at just under 650 OD, close to the 712m OD summit of Creag Ruadh, the highest natural ground in a large block of land. The blade-tips from these (180m BTH) turbines would reach nearly 830m OD with two others (of 200m BTH) also exceeding 800m OD at blade-tip. Thus the turbines of Glen Lednock Wind Farm (and Glentarken Wind Farm at a similar altitude for the highest blade-tips) would become the highest and most eye-catching features of this otherwise recessive landscape block by dint of their prominence and movement. This is well seen at many viewpoints but perhaps the subservience of the landscape to the turbines is best seen from VP6 (Figure 6.26) where the good quality of the baseline photography allows a proper appreciation of the proposed development.

20. The setting (wider context) of the proposed development within the southern Highlands – not adjacent or peripheral to the mountains but sitting within them – is a key consideration. Existing wind farms (and consented/application sites excepting Glentarken) are all at least 15km from the proposed development and are clearly perceptible as set outside or on the margins of the southern Highlands. Calliachar and Griffin wind farms lie north of the Highland Edge but their context and siting are such that they are still perceived as being on the margins when viewed from hills in the Southern Highlands. Glen Lednock Wind Farm would not have this mitigation but would insert a wind farm well towards the heart of the Southern Highlands. It would be jarring, even at a distance, whether looking into or out of the Southern Highlands, when the expectation is of a settled/developed landscape looking out to the lowlands but of a 'natural' landscape looking across or deeper into the Highlands; for example, from Bens Lawers, Chonzie or More.
21. Glen Lednock's turbines would not be sited in a nationally or locally designated or nationally designated landscape but it is surrounded by Munros and other mountains which do sit within such landscapes, indicative of the high value placed upon them. Its construction would diminish all of them. A hint of the popularity of the local area is seen in it having nearly three times the Scottish average employment in accommodation and food service activities (Glentarken Wind Farm EIAR Table 12-4).<sup>4</sup> Ben Lawers has the distinction of being the 9<sup>th</sup> highest Munro in Scotland and the only hill above 1200m not in the Cairngorms or Nevis ranges, yet is relatively easily ascended and thus highly attractive to novice hillwalkers as well as to seasoned mountaineers. Ben Chonzie is even more easily accessed and climbed by many walkers of all levels of ability.
22. All the adverse impacts described above for Glen Lednock Wind Farm would be increased and intensified if both it and the Glentarken Wind Farm scheme were to be consented since the two adjacent developments would appear as a single large wind farm, with 31 turbines of 180-200m BTH. In Mountaineering Scotland's view both of these schemes are unacceptable. Both developments would be visible from the same hills and uplands, though there are some differences in their low ground visibility, and both would have a similar adverse impact (Figure 6.19). Sometimes one or the other would have the primary impact depending on which side of the host ridge is more in view but since both substantially overtop the ridge this is a matter of nuance rather than a major differentiator. The solus damage from either scheme would be so severe that if one is consented, then consenting the other scheme would have only a modest additional impact. Other wind farms, because of their peripheral location have had – and for schemes in planning or under construction would have – nothing like the same impact. They are (would be) seen at greater distances, at different angles of view, and are perceived as peripheral to the hills of the Southern Highlands, which they are.
23. Mountaineering Scotland believes that a conjoined examination of the two schemes should be undertaken since both raise the same issues except for their different access routes. Indeed, it could be questioned why two adjacent schemes need completely different access routes rather than a single shared access.

### **Impact on the Mountaineering Experience**

24. The 'mountaineering experience' is a complex phenomenon. Mountaineers have multiple motivations, both individually and collectively. However, even a cursory glance at hillwalking magazines or chat on the hill shows that quality of visual experience (the view, the scenery) is

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<sup>4</sup> This level of detail is not given in the Glen Lednock application which gives data only for the whole Perth and Kinross Council area.

important. So too are feelings invoked by the physical experience of remoteness, perceived wildness, and engaging with hard terrain. The experience is enhanced by engagement with nature both visually and aurally. The resultant benefits for physical and mental health are increasingly recognised and promoted.

25. As the national membership organisation for mountaineering in Scotland, Mountaineering Scotland has a good sense of what motivates and disincentivises mountaineers through its daily contact with a wide range of mountain-goers. The evidence from surveys of mountaineers – not of general tourism – suggests that some activity is displaced from areas with wind farms to areas without.
26. Mountaineering Scotland undertook a survey in 2016 and repeated the same question in 2023 asking respondents if their behaviour had changed in response to wind farms. The results were statistically the same for the two years, analysed using 95% confidence intervals. Averaged, they suggest that 20% of hillwalkers would avoid an area with wind farms and go elsewhere while 42% would still go to an area with a wind farm but experience diminished enjoyment. It could be hypothesised that this latter group might then be inclined to make less frequent or fewer repeat visits to places providing less enjoyment. In contrast, only 2% would go to such an area more often. It would have no impact on 35%. These surveys did not ask about motivations directly, but the behavioural responses recorded and anecdotal evidence from talking to many hillwalkers suggest that they include a strong visual element.
27. The EIAR Chapter 14 does not give any specific consideration to hillwalkers or climbers other than mentioning the existence of Ben Chonzie, Creag Uchdag and the Glen Lednock climbing crags and boulders. It simply uses generic tourism data to suggest that there would be no impact.

## Conclusion

28. The above assessment shows that the proposed wind farm would have a significant adverse visual impact upon the popular hills in the surrounding it. It would also represent a significant movement of development from the edges to the interior of the Southern Highlands.
29. The LVIA repeatedly acknowledges that the proposed development would 'slightly' reduce some perceived characteristic important to hillwalkers such as wildness, remoteness or tranquillity but would not 'eliminate' it. This is true but it ignores the importance of cumulative impact. Already this area has two applications in Glen Lednock and Glentarken, which should be considered together. A decision to enable such visually intrusive development to enter the interior of the Southern Highlands should not be made lightly.
30. The proposed development is contrary to national policy (NPF4). Its siting would not 'preserve natural beauty'. It would have a significantly adverse impact upon the visual amenity and overall experience of those visiting the many Munroes, Corbetts and other notable hills that ring the proposed high-altitude site in this popular area and that of the climbers who visit the crags and boulders in Glen Lednocj itself.
31. Mountaineering Scotland **objects** to the proposed Carn Fearna wind farm.

Yours sincerely,

*Stuart Younie.*

**Stuart Younie**

**CEO, Mountaineering Scotland**

