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15 Feb 24

Dear Ms Keyes

**Vale of Leven Wind Farm**

**ECU00003468**

***A proposed wind farm development comprising up to ten wind turbines of approximately 7 megawatts (MW) each, with a maximum blade tip height of up to 250m, and Battery Energy Storage System (BESS) with a capacity up to 20 MW.***

Kilmaronock Community Council (KCC) represents a community in the Loch Lomond and Trossachs National Park that borders on the project site.

We held a public meeting on 12th February 2024 that was conducted in accordance with the procedures set out by West Dunbartonshire Council. We append the minutes of that meeting to this response for reference.

The conclusion from this public meeting by KCC is to **object** to the project.

Key reasons being:

- The energy that could be generated is insignificant to the national strategy as detailed in UK's Energy Security Plan.
- The scale of the development is too big, specifically too high, for its location
- Visual impact (size of turbines, 250m sat atop hills whose average height is 250m)
- Destruction of nationally designated peat bogland
- Negative impact on biodiversity (especially during construction) – not enhancing biodiversity as required by policy e.g. NPF4
- Proximity to housing and possible/probable negative impact to asset values
- Light pollution – Negative impact from red hazard lights for aviation.

Non-material points

- The Scottish government should change their policy on nuclear power particularly small scale on former industrial sites including existing nuclear licensed sites.
- No decommissioning bond or strategy has been proposed.

Yours sincerely  
G MacLellan  
Vice Chair, KCC

**Minute of the special meeting of Kilmaronock Community Council  
regarding the Statutory Consultation on the Vale of Leven Wind Farm  
planning application (ECU00003468)  
Monday 12<sup>th</sup> February 2024 at 7.30pm in Kilmaronock Millennium Hall**

1. Sederunt

KCC : Gavin MacLellan (GM, Chair of meeting), David Scott Park, Anita Anderson & Andrew Sinnott

Plus 28 members of the public

2. Introduction

GM outlined the reason for this meeting with the objective being to provide a consultation response to the Scottish Government (Energy Consents Unit) by the new deadline of 1<sup>st</sup> March. A copy of tonight's minutes will be sent with our official letter of response.

3. Recap of Developer information and presentations

There have been several information events held by the developers and their presentational information was made available in the hall tonight in hard copy and on screen. Those in attendance confirmed that they had seen it in one format or another. Source reference : <https://valeoflevenwindfarm.com/>

The Community Benefit Fund will provide £350,000 per year so, estimating the population of the affected communities to be 20,000, the net benefit per capita is £17.50 per person.

4. Overview of United Kingdom and Scottish Government policy

GM highlighted published policies regarding tackling climate change and renewable energy and the plans for meeting energy demand.

Powering up Britain- Energy Security Policy 4 April 2023

<https://www.gov.scot/publications/onshore-wind-policy-statement-2022/>

*"While imperative to meet our net zero targets it is also vital that this ambition is delivered in a way that is fully aligned with, and continues to enhance, our rich natural heritage and native flora and fauna, and supports our actions to address the nature crisis and the climate crisis."*

Information on targets for renewable energy generation were distributed in the hall for reference.

5. Basic industry information on wind turbine products available to generators

Technical information on large turbines was presented based on reference

<https://www.siemensgamesa.com/en-int/products-and-services>

Turbines of this size (250M above ground level) are typically used for offshore sites.

6. Community comments with reference to Vale of Leven Wind Farm

a) Alex McEwan – resident’s opinion

- Climate change is undeniable
- Estimated that by 2050 100 Gigawatt will be needed
- VoL WF contribution of 70 Megawatt is negligible compared to government target and above estimate
- Negative effect on landscape considerable
- Negative effect on tourism likely
- Negative effect on property values is possible/probable
- Effects on health unknown
- NPF4 promotes a precautionary principle for projects of this scale
- What are the other benefits?
  - Economy : Two permanent local jobs ; 17 across Scotland
  - Community Benefit Fund : Good practice but non-binding annual provision of £5000 per MW => £350K spread widely across multiple communities

b) Sally Page – resident’s opinion

- 5 drivers of global biodiversity loss, top of the list is changing land use, 3<sup>rd</sup> is climate change Source: UN Global Biodiversity Outlook - The Intergovernmental Science-Policy Platform on Biodiversity and Ecosystem Services (IPBES)
- This change of land use will be assessed against various policies:
  - LLTNPA – National Park Partnership Plan → large scale wind farms not supported within the NP ; areas adjacent to NP need to satisfy certain conditions
  - National Planning Framework (v4) – Policy 4 → unacceptable impact will not be supported – biodiversity must be enhanced.
  - WDC – Local Development Plan → the development impinges on protected areas
  - NatureScot – Maps also show this development impinging on important peat bog
  - ScotGov – Tackling Nature Emergency – Scottish Biodiversity Strategy to 2045
  - Woodland Trust – WT have already submitted an objection citing loss of veteran trees

- John Muir Way – The Kilpatrick Hills are highlighted as an “upland experience”, this development affects that part of the route.
- West Highland Way – as above
- The John Muir Trust – Guide on windfarms

7. General Community Discussion – comments:

There are discrepancies in the documents provided by the developers – 2 different maps show different peat depth for instance.

We are in this situation due to prevarication which we cannot afford to continue. There is a need for renewables now to counter human driven climate change from burning fossil fuels. The need for alternatives to fossil fuels has been known and ignored for 40 years and the immediacy needed now leaves no good options. We all need to accept change, stop burning fuels, use less energy and implement renewable sources now. Offshore options also have negatives, the power needs to be brought ashore and distributed which also needs new build of infrastructure such as substations and pylons across the countryside.

There are alternative forms of non-carbon energy that should be considered such as Fast Breeder Reactors but the present Scottish government position is, no nuclear power. Government policy on nuclear power needs to be revisited as new nuclear technology becomes available e.g. Small Modular Reactors.

Wind is not constant so 70MW contribution will be further reduced

Hydro schemes – we have constant river flow which ought to be captured

Size of turbines – now proposed to be 250m tall, the original plan was 19 smaller turbines before changing to 10 larger turbines.

ESB, the owner/operator, is an Irish state owned company meaning profits and carbon credit value will not be benefiting Scotland where the impacts are.

Is there a decommissioning plan? No plans submitted and no “Green Bond” is demonstrated.

Community Benefits Fund – the fund is not guaranteed – a complicated set up will be needed to adjust and distribute the benefits to the communities affected – setting up a benefit management trust will be challenging and costly.

Concrete and steel involved in the construction have carbon consequences but it was pointed out that the use of those materials is unavoidable and same for alternative solutions.

Demographic representation – the meeting tonight was essentially older members of the community, few younger members. They will have most to gain from any community funding but are not being represented.

During the compilation of the recent Local Place Plan, it was clear that the community is strongly for use of renewable energy, efficient use of energy and reduction in carbon use aiming for a Net Zero community. There will be opportunities to contribute “local benefit solutions” fully owned by the community when the Local Place Plan is being implemented.

Successful community schemes such as that on Eigg should be used as case studies to show what can be achieved.

**GM called for show of hands on whether KCC should formally Object or Support the planning application :**

**To Object : 21 votes**

**To Support : 3 votes**

**(32 people present, some were not KCC Residents and abstained)**

8. Summary of key points for Response to Consultation

KCC will send in a notice of objection to the proposed project

Key material points being :

- The scale of the development is too big, specifically too high, for its location
- Visual impact (size of turbines, 250m sat atop hills whose average height is 250m)
- Destruction of nationally designated peat bogland
- Negative impact on biodiversity (especially during construction) – not enhancing biodiversity as required by policy e.g. NPF4
- Proximity to housing and possible/probable negative impact to asset values
- Light pollution – Negative impact from red hazard lights for aviation.

Non-material points

- The project offers minimal contribution to renewable energy generation target and the national interest whilst has negative impact over large acreage.
- Government should change policy on nuclear power particularly small scale on former industrial sites including existing nuclear licensed sites.

After discussion and a vote, it was decided not to suggest alternative proposals such as reduced turbine size.

9. Community Councillors response to Scot Gov.

The minutes from tonight will be the basis for a letter to be submitted to the ECU by 1<sup>st</sup> March. The minutes will be sent with the letter and both will be posted on the KCC website shortly afterwards.

Copies will be sent to the planning departments at LLTNPA & WDC for good order.

Copies will be emailed on request by email or via website comment form.

<https://kilmaronockcc.org/>

Meeting closed at 20:30h