

Reference No: 16/03400/S36

Planning Hierarchy: Major

Applicant: RES Ltd (via Scottish Government Consents Unit)

Proposal: S36 consultation for proposed Killean Wind Farm

Site Address: Killean Wind Farm, Tayinloan, Argyll and Bute

SUPPLEMENTARY REPORT FOR NOTING

1.0 INTRODUCTION

This report serves to update Members on the current situation with Killean Wind Farm (16/03400/S36).

2.0 BACKGROUND

An application for consent for Killean Wind Farm under section 36 of the Electricity Act 1989, and for a Direction that planning permission should be deemed to be granted, was made in December 2016. An Environmental Statement was submitted with the application in accordance with the Electricity Works (Environmental Impact Assessment) (Scotland) Regulations 2000. The Scottish Government's Energy Consents and Deployment Unit consulted the Council on the proposal in accordance with Section 36 protocol. Officers recommended that the Council object to the Killean wind farm proposal for the reasons detailed in their report dated 4th October 2017. Members considered this recommendation at PPSL committee on the 18th October 2017 and agreed to object for the reasons specified and that the Scottish Government be notified accordingly (please refer to Appendix 1 for reasons for Council Objection).

As the Council objected to the proposal a Public Local Inquiry (PLI) is required to be held which will commence on the 8th January 2019 and the DPEA have decided that it will be a conjoined combination of Inquiry and Hearing Sessions with Clachaig Glen Wind Farm (16/01313/PP). Clachaig Glen was refused on the 21st September 2017 and subsequently became the subject of a planning appeal. The reason for its conjoined consideration with Killean is its proximity in terms of cumulative impact. It also shares the Killean access route.

The Energy Consents Unit has now authorised the applicant (RES) to vary the application submitted in respect of Killean from what was originally submitted to the Energy Consents Unit and considered by the Council. These amendments are detailed in 'Additional Environmental Information' which was submitted on the 21st August 2018. The AEI comprises 4 volumes: Volume I: Main Text; Volume IV: Updated Landscape & Visual Figures; Volume V: Technical Appendices; and a Private Water Supply Assessment. The main changes to the proposal are as follows:

- To remove Turbines 14 and 17.
- To amend the access track layout by removing the access tracks proposed to provide access to Turbines 14 and 17.
- To accommodate advances in technological development of turbines, the specifications of the candidate turbine is amended to reduce the maximum tower height to 91.5m and increase the maximum rotor diameter to 117m.

It is provided by the applicant that the variations to the proposed Killean scheme will accommodate concerns expressed by the owner of the property known as Braids. This property is currently a ruinous dwelling located within the application site. It has the benefit of planning permission to allow for the renovation of the ruin to provide a single dwelling with associated servicing (Planning Reference 16/02779/PP).

3.0 OBJECTION RAISED TO THE AMENDMENT OF THE KILLEAN APPLICATION BY SUBMISSION OF ADDITIONAL ENVIRONMENTAL INFORMATION

When Officers became aware of the proposed changes and intention to vary the application at the Pre-examination meeting on the 3rd July 2018, an objection was raised at the meeting and followed up with a written objection sent from the Council's Senior Solicitor to the Energy Consents Unit on the 27th July 2018.

This objection was on the grounds, amongst other things that;

1. The variations proposed would be material. This view was formed in advance of the Additional Environmental Information being submitted, on the basis that it was indicated at the Pre Examination Meeting that the rotor diameters of the turbines were proposed to be increased. The materiality and potential impact of this change was of concern to Officers particularly in relation to:
 - Ornithological impact – potential for increased collision risk, due to the wider diameter of the rotor;
 - Landscape and Visual Impact – potential for increased visibility and landscape impact, due to the wider diameter of the rotor; and
 - Noise Impact – potential for increased noise immissions, due to the wider diameter of the rotor.
2. The variations proposed by way of submission of AEI by the Applicant at this stage in proceedings does not accord with the 'Code of Practice For Handling Inquiries Under Section 62 and Schedule 8 to the Electricity Act 1989' ('the Code') which sets out the arrangements which the DPEA will apply to ensure all parties are clear about what will happen and what is expected of them. The Code is designed to ensure the inquiry process is fair, robust and efficient.
3. It was considered that the Applicant, by requesting an amendment to the application at this stage in proceedings, had failed to make early and full disclosure of their case and to adopt a constructive approach to narrowing the range of issues to be considered at the inquiry;
4. That the amendment of the application at this stage in the proceedings is considered to be unreasonable behaviour and that the Council objects to the amendment of the application by the Applicant.

The Council invited the ECU to refuse the proposed amendment and advise the Applicant that they will require to either continue with the application for the development applied for or withdraw the application and thereafter submit a new application for the development now proposed.

In response to the Council's letter of objection the applicant's solicitors, Messrs Wright, Johnston & MacKenzie LLP submitted a letter to the ECU dated 8 August 2018. It was submitted, amongst other things, that the grounds of the objection by the Council were not supported by the Electricity Act 1989, the Electricity Act (Application for Consent) Regulations 1990/455 (as amended), and the Code of Practice for Handling Inquiries under Section 62 of Schedule 8 to the Electricity Act 1989. In conclusion it was submitted, amongst other things that the proposed variation was a variation to the application under the Electricity Act 1989, not an appeal under the Planning Act. While the cases on materiality may be useful in considering what might amount to a change to the application, the Scottish Ministers are not bound by the same considerations as would apply to a planning appeal. It was submitted that no party would suffer prejudice as a result of the proposed variation being made by the

variation being made by the applicant. The proposed change to the application would not result in a development that is different on scale, substance and character from that originally proposed. The Reporters have been formally appointed by the Scottish Ministers to hold a PLI and are able to consider “any matter relating to the exercise by them of a function under this Part” (s62 ss1A of the Electricity Act 1989). They therefore have the authority to consider the application as proposed to be varied. The submission previously made to the Scottish Ministers that the proposed variation is entirely within the scope of what could competently be allowed without a fresh application being required was recommended and repeated. The proposed variation in the application would not lead to a development which is in any sense different in scale and character. It would not change the level of significant effects. The proposed revised development would constitute a proposed wind powered generation station comprising 15 turbines, with a generating capacity of more than 50MW and no change to the proposed turbine tip heights.

The Energy Consents Unit responded to the objection and representation by the applicant’s solicitor on the 20th August 2018. In their correspondence they conclude that given the nature of the proposed amendments and that the Inquiry has not yet commenced, they consider the proposed amendments do not merit the submission of a new application and can be considered as additional information in the assessment process. This would be on the basis that the additional information as listed in the letter 6 July 2018 is advertised in accordance Regulation 20 of Electricity Works (Environmental Impact Assessment) (Scotland) Regulations 2017. The applicant is required to provide a copy of the additional information to the planning authority and any other person to whom a copy of the ES report was sent. The applicant must publish a notice in the required newspapers and state on that notice how and by what date representations may be made (being a date not earlier than 30 days after last date on which the notice was published). Any representations received by the ECU will be forwarded to the DPEA for the reporter’s consideration as part of the inquiry. In conclusion the ECU are content for the proposed amendments to be considered as additional information in accordance with the Electricity Works (Environmental Impact Assessment) (Scotland) Regulations 2017 and assessed during the inquiry process.

4.0 SCOPE OF ADDITIONAL ENVIRONMENTAL INFORMATION (AEI)

As detailed above the Energy Consents Unit has consented to the amendment of the Killean application. The AEI has been submitted in accordance with the Electricity Works (EIA) Regulations 2017 (Transitional Provisions). It provides information on the nature and extent of the amendments; identifies and assesses the likely significant environmental effects of the proposed development, to the extent that these may be different from the findings of the original ES. It also provides an updated cumulative assessment and provides an addendum to the Peat Stability Risk Assessment Report included within the original ES. The AEI should be read with the ES 2016 except where specified to be superseded in the AEI. It comprises the following:

- An introduction including a statement from the applicant outlining the relevant expertise or qualifications of the experts who have prepared the report and a concluding summary.
- A section updating the Design Evolution Chapter of the ES.
- An addendum to the Landscape and Visual Impact Assessment with relevant additional visualisations (including appropriate ZTVs, wirelines and photomontages).
- A Noise Section, including shadow flicker, to update the Noise Chapter of the ES.
- An Ornithology Section to update the Ornithology Chapter of the ES.
- A Traffic and Transport Section to update the Traffic and Transport Chapter of the ES
- An Addendum to the Peat Stability Risk Assessment with accompanying explanation to address the six points of revision and clarification required to be addressed in the checking report prepared by AM Geomorphology, commissioned by the Energy Consents Unit in respect the Peat Stability Risk Assessment Report included within the original ES.
- A Private Water Supply Statement has also been submitted

5.0 DESIGN EVOLUTION

This section of the AEI updates and supplements Chapter 3: Design Evolution and Alternatives of the ES following the changes made to the proposed wind farm. When the original turbine layout design was submitted as part of the original ES in December 2016, 'Braids' was a ruin and undeveloped. A planning application (16/02779/PP) for the redevelopment of the ruin into a dwellinghouse was submitted on the 4th of November 2016. The application was approved on 12th December 2016 and as far as the applicant is aware, has not been implemented. The removal of T14 and 17 addresses the concerns of the owners of Braids. In views from Braids, T14 and T17 in the application layout were the closest and most prominent turbines, at approximately 500m away. Their removal would mean that the closest turbine is now T15 at 794m away. With the removal of T17 the angle of view occupied by turbines would be slightly less, and there would no longer be stacking between T14 and T9, which sits behind T14 in the view.

6.0 LANDSCAPE AND VISUAL

The AEI provides updated and additional landscape and visual information in response to changes to the turbine layout, turbine dimensions and the cumulative baseline.

It concludes that the removal of T14 and T17 would not result in any changes to the nature and significance of landscape and visual effects as described in the LVIA. Changes to the landscape, including a reduction in the area of forest removed in the short term and a shorter access track, would not be noticeable at the scale of the landscape character type. Effects on landscape character type would continue to be significant up to around 5km from the site. The removal of the two turbines would be perceptible in closer views, becoming less perceptible with distance. In some views it would result in a simpler layout, with less stacking, in others it would introduce a gap between turbines. Overall it would not change the nature and significance of the visual effects identified at any of the LVIA viewpoints. The effect on receptors at the new viewpoint at Pirnhill would be minor and not significant, and this would not change the conclusions with regard to the North Arran NSA, as set out in the LVIA.

It is considered that the lower hub and larger rotor diameter would only be discernible in close views, with the apparent differences in turbine dimensions quickly diminishing with distance. In addition, small numbers of hubs would become screened by topography due to their lower heights from certain viewpoints. Overall, there would be no change to the nature and significance of landscape and visual effects as described in the LVIA.

Changes to the cumulative baseline are small, with most changes relating to a change in the status of the wind farm e.g. consented to operational. The removal of Creggan has a beneficial effect in some views, separating the cluster of wind farms created by the proposal, Deucheran Hill and potentially Clachaig Glen, with the cluster formed by Blary Hill, Beinn An Tuirc and its extensions. Overall the findings of the CLVIA would not be affected.

There will be some improvement to the nature of visual effects at Braids because of the removal of the two closest turbines (numbers 14 and 17). This will result in the closest turbine being Turbine 15, 0.8km to the southeast. There is no window proposed on the southeast elevation of the property, and whilst the turbines will clearly be seen at close range to the northeast through to the southeast, views to the northwest, west and southwest will not be affected. These include the key views down to the coast, and the views from the garden on the southwest side. In views to the northeast, there will be some screening and containment provided by rising ground, outbuildings and a stone wall on the perimeter. The visual effects will be significant, but in terms of the usual approach taken to residential amenity, it is not considered that the property will become widely considered to be an unattractive place in which to live.

Consultation has been undertaken with Carol Anderson the Landscape Architect who will be representing the Council at the Public Inquiry Sessions in regard to the Landscape, Visual & Cumulative Impact Issues detailed in the Additional Environmental Information. Carol Anderson concludes that from a landscape and visual point of view, the changes (omission of two turbines and changes to turbine design) are very minor and would not alter the

Council's conclusions on the nature and significance of landscape and visual effects. There is some slight improvement in terms of avoiding overlapping of turbines by omitting turbines 14 and 17 evident in some viewpoints (e.g. viewpoints 2, 4 and 6) but as the Council's objection is one of principle in that this wind farm is not located in the right place, then there would be no change to the Council's original appraisal which was based on the scale and prominence of the development and its more sensitive location.

9.0 ORNITHOLOGY

The AEI also updates the ornithological impact assessment for the Killean wind farm that was reported in project Environmental Statement (ES), to address whether an increase in rotor diameter from 99.8m (as assessed in the ES) to 117m might alter the previous findings in relation to ornithology, and the reduction in risk from the dropping of two turbines from the original 17. There were three key differences in relation to the collision risk modelling in comparison with the previous modelling undertaken for the ES; (a) a larger rotor swept area resulting in an increase collision risk volume, (b) reduced rotational speed resulting in reduction in collision risk, and (c) reduction in turbine number from 17 to 15.

Overall this assessment update of the collision risk for larger turbines but with a reduced number of turbines (15) found a slightly increased collision risk in comparison with the 17 turbine layout with a 99.8m rotor diameter turbine. This did not, however, make any material difference to the conclusions reached. There would be low/negligible magnitude collision risks to all of the key species assessed, which would not result in any significant ornithological impacts, alone or in-combination.

The Local Biodiversity Officer has considered the Additional Environmental Information and advises that her comments on the original application still stand.

10.0. TRANSPORT AND TRAFFIC

The AEI also assesses the traffic impact of the amended Proposal which includes a reduction in traffic, compared to that previously presented, to account for a reduction in the number of turbines and associated enabling infrastructure. During the lifecycle of a wind farm the temporary construction period is associated with the highest traffic flows and so this assessment has focused on this area. Vehicular access to the site is via the existing haul road/Kintyre Way from the A83 at Killean. The preferred route for the delivery of turbine equipment to the proposal is from the port of Campbeltown. The IEA Guidelines have been followed during the assessment process. The study network included the A83 north and south of the site. Baseline traffic flows were sourced for this road. The average daily traffic flows associated with construction were determined and added to the baseline. The predicted increase in HGV only traffic flows shows negligible impacts on sections of the A83; these 10% - 30% increases in traffic indicate a negligible change in conditions or circumstances. A Transport Management Plan (TMP) would be developed in consultation with the Council, TS and Police Scotland should the proposal be successful in obtaining planning permission. Overall the residual effect of the proposal is considered not to be significant.

Five cumulative wind farm developments for which construction timescales may overlap with that of the proposal have been identified in the area. These include three wind farms which have been approved – Blary Hill, Beinn An Tuirc Phase 3 and Tangy 3 – and two for which appeals have been submitted – Clachaig Glen and Eascairt. A cumulative assessment for the Clachaig Glen wind farm development determined that the cumulative impact of the Creggan, Blary Hill, Eascairt, Clachaig Glen and Beinn An Tuirc Phase 3 wind farms would result in negligible change in conditions or circumstances. Given that the Creggan wind farm has been refused and the potential impact of the Blary Hill wind farm can be controlled, it is considered that the cumulative impact of the five developments will also result in a negligible change in conditions or circumstances.

The Area Roads Engineer has no objection to the Additional Environmental Information notes that the proposal continues to be accessed from the A83 Trunk Road and advises that Transport Scotland should be notified.

11.0. NOISE & SHADOW FLICKER

The AEI includes an updated acoustic and shadow flicker assessment of the proposed Killean wind farm following a reduction in the number of turbines, which supersedes that presented in the ES submitted in 2016. The noise limits recommended in relevant legislation and guidance would be met at all considered receptors with the adoption of appropriate mitigation measures such that the resulting acoustic impact would be deemed acceptable. This is the case in both the assessment of Killean alone and cumulatively with nearby existing and proposed schemes. A comparison with the results presented in the ES show that the acoustic impact at the nearest receptor is reduced due to the revised layout. A Shadow flicker assessment indicates that the Braids may experience flicker events at sunrise. This is an extremely conservative estimate however mitigation solutions have been proposed which will prevent shadow flicker nuisance. The applicant will install shadow detection technology on relevant turbines and create a shutdown timetable. This will ensure that the Braids property is not subjected to shadow flicker nuisance.

The Environmental Health Officer has no objection to the Additional Environmental Information in relation to Noise & Shadow Flicker subject to conditions to be agreed to control noise limits.

12.0 PRIVATE WATER SUPPLY ASSESSMENT

This document submitted as part of the AEI provides information relating to the proposed private water supply which is part of the planning permission for redevelopment of the currently ruined property at Braids (16/02779/PP). The aim of the document is to inform the Planning Authority – which in this case is the Scottish Government – whether there is a risk to the redevelopments proposed Private Water Supply from the Killean wind farm and provide recommendations for mitigation and a contingency plan should risk be identified. The assessment concludes that the proposed PWS for Braids would have a potential un-mitigated risk of ‘moderate’. The main potential effects of the proposal on the PWS are identified as chemical pollution and sedimentation of receiving surface waters, impediments to flow from drainage and crossings, and disturbance to peatlands from excavation. Mitigation measures including the implementation of a CEMP and PWS water monitoring plan, have been proposed which would reduce the likelihood and magnitude of the potential effects on all the sensitive receptors. It is likely that rotational forestry works (which cover approximately 75% of the overall catchment) would pose a greater residual risk to the PWS than the proposed wind farm infrastructure. Overall, the effects of the proposal on the sites geology, hydrology and hydrogeology regime are not considered to be significant due to the scale of the operations; use of existing tracks and quarry footprint; and the proposed infrastructure within the catchment. An appropriately qualified Environmental Clerk of Works (ECoW) or Environmental Advisor should be appointed to provide onsite advice regarding the permanent and temporary drainage design and proposed mitigation measures. Providing the mitigation and monitoring detailed above is implemented in full by an appropriately qualified and competent individual or party, the residual risk would be low.

The Environmental Health Officer has no objection to the Additional Environmental Information in relation to the Private Water Supply and notes that the report recommends that measures to protect the private water supply are contained within a CEMP.

13.0 FLOOD PREVENTION

Internal consultation was undertaken with the Flood Prevention Officer on the Additional Environmental Information who has confirmed that the flood risk and drainage comments have not changed since their original consultation response.

14.0 CONCLUSION

The AEI concludes that the removal of T14 & T17 and the change in turbine dimensions will not change the overall nature and significance of the landscape and visual effects as described in the ES. The deletion of Turbines 14 and 17 from the proposed layout will result in a reduction of the potential effects upon the proposed residential property, Braids, as these turbines were the closest to it. The study concludes that whilst a high magnitude of change is expected, potential residents would not experience impacts on the visual component of residential amenity or living conditions which would affect the outlook of these residents to such an extent that the proposed residential property would generally become regarded, in the wider public interest, as an unattractive place to live. Overall the changes in the residual effects of the proposal from those presented in the ES are considered not to be significant. Operational noise levels both in the context of Killean alone and in combination with other sites will be met and can be secured with the adoption of mitigation as described in the Noise Section of the AEI. There are no significant changes to the construction noise assessment as contained in the ES. Appropriate measures can be taken to address the shadow flicker at Braids on the occasions that this may occur. The collision risk assessment found that the proposed change to the turbines did not make any material difference to the conclusions reached in the ES. There would be low/negligible magnitude collision risks to all of the key species assessed, which would not result in any significant ornithological impacts, alone or in combination. In respect of traffic and transport, the predicted increase in HGV only traffic flows show negligible impacts on sections of the A83; these 10% - 30% increases in traffic indicate a negligible change in conditions or circumstances. Overall the residual effect of the proposal is considered not to be significant. The updated cumulative assessment for Killean indicates that there is a negligible change from that assessed in the ES.

In light of the above, and the advice of the relevant internal consultees, there is no change to the recommendation to object to the proposal for the landscape, visual and cumulative impact reasons detailed in the main report dated 22nd December 2017 (and also at Appendix 1 to this report). The conditions recommended (including any revisals in light of the amendment to the proposal) by the Environmental Health Officer, Local Biodiversity Officer and Flood Prevention Officer will be relayed to the relevant Reporter and put forward in the Inquiry Paperwork for consideration at the Hearing Session for Conditions.

13.0 RECOMMENDATION:

To note this report continue to object to the proposal for the same reasons as detailed in the main report dated 22nd December 2017 and as shown in Appendix 1 of this report and to update the Reporters on revised conditions.

Angus Gilmour
Head of Planning, Housing and Regulatory Services

Author of Report: Arlene Knox 2nd October 2018

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APPENDIX 1: REASONS FOR COUNCIL OBJECTION TO KILLEAN WIND FARM

1. At 149.9m in height to the blade tip, the proposal would be out of scale with its landscape context, and the turbine size would not be in keeping with other wind farm developments close by. This size of turbine would dominate the scale of the smaller more complex edge hills on the western edge of the upland area and would be an unwelcome intrusion in coastal landscapes. The west coast of Kintyre is designated as an Area of Panoramic Quality (APQ) in recognition of its scenic qualities of regional value. The proposal impinges on the sensitive coastal skylines which frame and provide a setting for the coast which is characterised by the contrast between the land and the sea, and development on the scale proposed would undermine these qualities to the detriment of landscape character.

From elevated locations, including very popular hill walks, as represented by VP10 Beinn Bharrain in the North Arran NSA, there will be a significant adverse visual effect. Views are focused towards Kintyre and the islands of Gigha and the Paps of Jura beyond. Killean wind farm would form a new distracting focus on the Kintyre skyline, interrupting scenic views towards the islands/Sound of Gigha. The turbines would visually link the Kintyre skyline to Gigha, interrupting the stretch of water important to the setting of the islands from high elevation views. The proposal will be visible above Deucheran Hill (76m) which appears in scale with the landscape and clearly associated with the interior of the peninsula; but will read as a separate and contrasting scheme due to its much greater scale (149.9m) almost double the height. The applicant's ES accepts that significantly adverse visual effects will be experienced over a relatively widespread area of the NSA across the west facing slopes, below the Pirnhill Hills, across several kilometres.

The proposed wind farm, inclusive of the means of access required, is located on the small edge hills on the outer western edge of the uplands of the Kintyre peninsula, within the 'Upland Forest Moor Mosaic' Landscape Character Type (ref 'Argyll & Bute Landscape Wind Energy Capacity Study (LWECS) (SNH/Argyll & Bute Council 2017) in very close proximity to the smaller scaled and highly sensitive coastal 'Rocky Mosaic' Landscape Character Type. Sensitivity increases at the transition between these two landscape character types due to the smaller scale of the hills on the western edge of the upland area, proximity to settled and farmed landscapes and to the coast, where sensitive receptors are concentrated. The proposal will intrude significantly on views of the peninsula from the coastal edge ('Coastal Plain' Landscape Character Type) and from offshore, in particular from the Isle of Gigha ('Coastal Parallel Ridges' Landscape Character Type) and the ferry route to/from

Islay. The proposal is not associated with the larger scale, simple upland interior where development of this scale has better prospects of being assimilated successfully in its landscape setting.

The 'Argyll and Bute Wind Energy Capacity Study' states that: *'larger turbines/more extensive wind farm developments sited on the outer edges of the Kintyre Uplands where they would be likely to significantly increase landscape and visual impacts on the settled coast edge of Kintyre and on views from Arran and Gigha and would also further erode the established pattern of developments largely associated with the less sensitive core of these uplands'*.

The foregoing environmental considerations are of such magnitude that they cannot be reasonably offset by the projected direct or indirect benefits which a development of this scale would make, including the achievement of climate change related commitments.

Having due regard to the above, it is considered that this proposal would have a significant adverse impact on Landscape Character, would adversely affect a number of key views and would degrade designated scenic assets including an 'Area of Panoramic Quality'. It is therefore inconsistent with the provisions of the Scottish Planning Policy and Scottish Government's Specific Advice Sheet on Onshore Wind Farms; Policies LDP STRAT 1 - Sustainable Development; LDP DM 1 – Development within the Development Management Zones; LDP 6 – Supporting the Sustainable Growth of Renewables; and LDP 9 – Development Setting, Layout and Design; of the 'Argyll & Bute Local Development Plan (adopted 2015) and Supplementary Guidance: SG LDP ENV 13 – Impact on Areas of Panoramic Quality (APQs); and the Argyll & Bute Landscape Wind Energy Capacity Study (LWECS) (2017).

2. The proposal would present relatively high visibility, compared to other wind farm development on the peninsula, would increase the prominence of wind farms in Kintyre and would have significant visual effects upon: the coast, including key recreation areas/tourist destinations/beaches. For example, Rhunahaorine Point area as represented by e.g. VP4 (Point Sands), and Southern Knapdale/ West Loch Tarbert area as represented by VP11 (B8024 Knapdale), and promoted walks to the archaeological features of Dun Skeig as represented by VP9 (A83 at Clachan); Key routes often in close proximity including: the Kintyre Way as represented by e.g. VP4 (Point Sands); A83 as represented by VP9 (A83 at Clachan); B8024 as represented by VP11 (B8024 Knapdale); the Gigha ferry; the Arran ferry (Lochranza routes); and the Islay ferry (West Loch Tarbert area as represented by VP12 Islay Ferry); Offshore including Gigha as represented by VP6 (Ardminish Bay), VP8 (Creag

Bhan) and the Sound of Gigha (a popular sailing route, no viewpoint provided); and Hill views (as represented by, for example, VP5 Beinn Bhreac).

The turbines would extend large scale wind turbine development on the skyline of the coastal edge of the peninsula, where it would exert an unwelcome influence over locations within the adjacent West Kintyre Area of Panoramic Quality. The development would also necessitate the formation of an extensive area to provide a means of access incorporating a turning area on the shoreside of the A83 (T), which in itself would constitute an intrusive form of development presenting adverse consequences for visual amenity.

The foregoing environmental considerations are of such magnitude that they cannot be reasonably offset by the projected direct or indirect benefits which a development of this scale would make, including the achievement of climate change related commitments.

Having due regard to the above, it is considered that this proposal would have a significant adverse impact on visual amenity by introducing prominent large scale development into a number of key views, and would degrade designated scenic assets including the adjacent 'Area of Panoramic Quality'. It is therefore inconsistent with the provisions of the Scottish Planning Policy and Scottish Government's Specific Advice Sheet on Onshore Wind Farms; Policies LDP STRAT 1 - Sustainable Development; LDP DM 1 – Development within the Development Management Zones; LDP 6 – Supporting the Sustainable Growth of Renewables; and LDP 9 – Development Setting, Layout and Design; of the 'Argyll & Bute Local Development Plan (adopted 2015) and Supplementary Guidance: SG LDP ENV 13 – Impact on Areas of Panoramic Quality (APQs); and the Argyll & Bute Landscape Wind Energy Capacity Study (LWECS) 2017.

3. The proposed development at Killean is not visually associated with the existing clusters of wind farm development, being a location more closely associated with the coast. The addition of this proposal to the western edge of 'Upland Forest Moor Mosaic' character type would erode the established pattern of wind energy development on the Kintyre peninsula, and would spread the influence of large scale turbine development away from the interior hills to the smaller scale and more sensitive coast and seascape. The existing focus of development around the central part of the spine of Kintyre is now well established, so the proposal would represent an outlier with influence over the coast, which would present a disproportionate cumulative impact upon both landscape character and scenic quality.

The foregoing environmental considerations are of such magnitude that they cannot be reasonably offset by the projected direct or indirect benefits which a development of this scale would make, including the achievement of climate change related commitments.

Having due regard to the above, it is considered that this proposal would contribute disproportionately to adverse cumulative impacts arising from the presence of wind farm developments in Kintyre. It is therefore inconsistent with the provisions of the Scottish Planning Policy and Scottish Government's Specific Advice Sheet on Onshore Wind Farms; Policies LDP STRAT 1 – Sustainable Development; LDP DM 1 – Development within the Development Management Zones; LDP 6 – Supporting the Sustainable Growth of Renewables; and LDP 9 – Development Setting, Layout and Design; of the 'Argyll & Bute Local Development Plan (adopted 2015) and Supplementary Guidance: SG LDP ENV 13 – Impact on Areas of Panoramic Quality (APQs); and the Argyll & Bute Landscape Wind Energy Capacity Study (LWECS) 2017.