

**Argyll and Bute Council
Planning and Regulatory Services
Development and Infrastructure Services**

This report is a recommended response to the Scottish Government's Energy Consents and Deployment Unit (ECDU) Section 36 consultation regarding the proposed Airigh wind farm, on Land south-west of Tarbert, Argyll and Bute

Reference No: 17/02484/S36

Planning Hierarchy: Major

Applicant: EDF Energy Renewables Ltd (via Scottish Government Consents Unit)

Proposal: Electricity Act Section 36 consultation relative to Airigh Wind Farm

Site Address: Land south-west of Tarbert, Argyll and Bute

SUPPLEMENTARY REPORT NO. 2

1.0 ADDITIONAL ENVIRONMENTAL INFORMATION (AEI)

- 1.1 In August 2017, EDF Energy Renewables ('the Applicant') submitted an application to the Scottish Government Energy Consents Unit (ECU) for Section 36 consent under the Electricity Act 1989 ('the Act'), to construct and operate a wind farm development known as Airigh wind farm ('the Development') in Argyll and Bute Council administrative area. A request was also made by the Applicant that planning permission is deemed to be granted under Section 57 of the Town and Country Planning (Scotland) Act 1997, as amended.
- 1.2 Since the application was submitted, and since the recommendation of the Council to object to the proposal, the applicant has taken the decision to make slight amendments to the location of some onsite infrastructure components, the effects of which need to be reassessed. There have also been information requests from consultees (Scottish Natural Heritage (SNH), Forestry Commission Scotland (FCS), AM Geomorphology (on behalf of Scottish Ministers) and the Royal Society for the Protection of Birds (RSPB) Scotland) during the application consultation period, which the ECU formally requested from the applicant on the 16th January 2018 under Regulation 19 of the EIA Regulations.
- 1.3 The Applicant has therefore prepared and submitted Supplementary Environmental Information (SEI) under Regulation 19 to respond to the information requests, and to provide an assessment of the changes proposed to the development. Where relevant, the applicant has also taken the opportunity to present new information to inform the original assessments of the EIA Report (2017). The SEI is intended to supplement the EIA Report, and unless otherwise stated, the EIA Report content remains unchanged.
- 1.4 In summary, the SEI is intended to:

- (i) Describe and assess two minor changes to the onsite infrastructure. These relate to increased size and altered shape of the most northerly construction compound (near to the site entrance) and a new location of the onsite substation and control building.
- (ii) Describe some minor amendments to the Forest Design Plan (in response to FCS request) associated with the development, including extension of the redline application boundary to the south to incorporate land under control, which is proposed for long-term tree management purposes.
- (iii) Provide an additional viewpoint visualisation and assessment from the northern end of the Isle of Gigha (in response to SNH comments).
- (iv) Provide additional visualisations for existing viewpoints showing darker coloured turbines.
- (v) Provide additional information to support Appendix 7.2: Peat Stability Assessment of the EIA Report (in response to Geomorphology request).
- (vi) Provide an update to Appendix 14.1: Carbon Report (in response to RSPB comments).
- (vii) Provide details of peat depths at key locations requested by RSPB
- (viii) Provide an updated cumulative ornithology assessment at the Natural Heritage Zone (NHZ) level (in response to SNH request).
- (ix) Provide details of the proposed new construction traffic access arrangements and highway amendments, and associated traffic and transport and noise assessment updates.
- (x) Provide copies of Memorandum of Understanding (MoUs) signed by Tarbert and Skipness Development Trust and Ardrishaig Community Trust, in respect of shared ownership offer to local communities.
- (xi) Provide an assessment of effects of the Development on climate change, major accidents and disasters and human health as introduced in the 2017 EIA Regulations, given the length of time that the new Regulations have now been in force (SEI Chapter 15).
- (xii) Provide details of the revised application description following amendments to the forestry plan and highway works required.

1.5 The submission of the SEI triggered a further round of consultation on the application. A copy of the SEI is also available to view on the Scottish Government Energy Consents Unit website.

2.0 CONSULTEE ADVICE IN RESPONSE TO SEI

INTERNAL CONSULTEE RESPONSES TO SEI

Council's Landscape Consultant, (Carol Anderson Landscape Associates) (25th March 2019) – following submission of the SEI the Council employed Carol Anderson to review the landscape and visual reasons for objection, as detailed in the main report, of December 2017. Carol Anderson's advice concludes that: on the positive side, this proposal would not significantly affect the Knapdale NSA and it would also not have a significant effect on views from the A83. The location of the proposed wind farm within a depression provides partial screening with the full height of the turbines often not seen in key views (it would be far more prominent if sited on the ridge of high open hills). Significant landscape and visual effects would be unlikely to be widespread being largely focused in the area of West Loch Tarbert. Despite this, key landscape and visual concerns are: Effects on the Knapdale APQ particularly appreciated from parts of West Loch Tarbert in views from the Islay Ferry and Dun Skeig, parts of the north-west Kintyre coast; Strategic cumulative effects – introducing large wind turbines to this part of Knapdale where the screening provided by the high ridge between Stob Odhar and Meall Reamhar prevents views of Srondoire and Allt Dearg wind farms in the West Loch Tarbert area and where this seemingly little developed area of south Knapdale contrasts with the increasingly intensive array of wind farm developments located on the Kintyre peninsula; and the layout of turbines at variable levels leads to an unsatisfactory 'jumbled' appearance evident in views from the south-west and the proliferation of access tracks in these uplands (>14km of new access track will be constructed) is also a concern. The proposal is contrary to some of the guidance in the ABLWECS although it is important to note that this study also identified some potential scope for large turbines in this area (LCT 6b). A consent for this development could open up the Knapdale area to a new wave of wind farm applications and it is an added concern that this applicant is proposing 30km of road access (upgraded and new) to service just 14 turbines. Although I appreciate that the potential for future developments cannot be considered in a planning decision, it would not be surprising if extensions are proposed to this development soon after any consent.

Council's Roads Engineer (5th March 2019) – no objection subject to conditions

Council's Local Biodiversity Officer (5th March 2019) – no further comment.

Council's Environmental Health Officer (26th February 2019) – no objection or further comments.

Council's Archaeological Advisors, the West of Scotland Archaeologist Service
– no response at time of writing.

Council's Access Officer – no response at time of writing.

Council's Flood Risk Assessor – no response at time of writing.

Council's Development Policy Team – no response at time of writing.

CONSULTEE RESPONSES TO ENERGY CONSENTS UNIT ON SEI

Scottish Natural Heritage (4th March 2019) – In relation to their remit, SNH have provided advice on the following topics covered by the SEI: Additional viewpoint from northern Gigha; Updated cumulative ornithology assessment at NHZ14 level; and proposed new construction traffic access arrangements. In summary – SNH’s advice remains that the nature and scale of the proposal cannot be accommodated in this location without significant adverse landscape and visual effects as outline in their previous response dated 10th November 2017.

Scottish Water (12th February 2019) – no objection

Ministry of Defence (MOD) (27th February 2019) – no objection subject to conditions to secure aviation safety lighting.

Glasgow Prestwick Airport (21st February 2019) - no objection.

National Air Traffic Services (NATS) (19th February 2019) – no objection.

VisitScotland (14th February 2019) – no additional comments to make, previously advised they have no objection.

Scotways (5th March 2019) - no comment.

BT (13th February 2019) - no objection.

Joint Radio Company (12th & 14th February 2019) - proposal is cleared with respect to radio link infrastructure operated by: The Local Electricity Utility and Scotia Gas Networks.

The Coal Authority (12th February 2019) – no comments or observations.

Peat Landslide Hazard and Risk Assessments Checking Report Prepared for Energy Consents Unit by AM Geomorphology (26th March 2019) – confirms that the additional work undertaken for the 2019 PLHRA satisfactorily addresses the shortcomings identified in the 2017 PLHRA. No further revisions are required and no conditions specific to peat instability are recommended.

Royal Society for the Protection of Birds (15th March 2019) – RSPB’s concerns expressed in their original response (October 2017) (they did not object) were that many of the impacts from this proposal have been under-estimated and impacts on birds of conservation concern and peatland needed more consideration / mitigation. This response should be considered alongside their initial one. RSPB provide further advice on Ornithology; black and red-throated diver; golden eagle; black grouse; and peatland considerations

Forestry Commission Scotland/Scottish Forestry (14th March 2019) - The SEI has addressed the majority of concerns raised in FCS consultation response of 9th November 2017. As a result, FCS do not object to the proposal, assuming that a

condition is applied to any consent to ensure compensatory planting (CP) and a full forest plan is completed.

Historic Environment Scotland (14th March 2019) – no objection, have no additional comments to add to their previous response dated 4th October 2017.

Marine Scotland Science (13th March 2019) - reiterates its advice that the developer establishes a robust water quality monitoring programme incorporating MSS guidelines. This monitoring programme could be secured by a suitably worded condition, should consent be granted for this development.

Transport Scotland (13th March 2019) - no objection subject to conditions.

South Knapdale Community Council (28th March 2019) - confirms that its' original representation, dated 18th October 2017, remains valid and is not altered by the SEI. It is noted that further to the original submission of the Airigh Wind Farm planning application submitted by EDF Energy Renewables Ltd (EDF), a significant amount of additional work has been undertaken by EDF's agent Force 9 Energy Partners LLP (F9) to refine the planning application. SKCC has carefully considered the information contained in the SEI and as a consequence, has formulated some questions and related observations; SKCC ask the ECU to put these questions to the applicants and deliberate on the answers when reaching its' conclusions: 1. Should the project proceed, what demonstrable employment opportunities - short term during construction and long term with the ongoing operation - will there be for local people, contractors and businesses? 2. What are the tangible economic and enriching benefits to the Community of South Knapdale that are likely to flow from the project – especially over the anticipated 20 or more years that the wind farm will operate? 3. The SEI describes how F9 has signed Memoranda of Understanding (MoU) with two communities. SKCC has not accepted the currently presented terms of the MoU as they fall short of Government directions and guidelines on the arrangements that should be offered to affected communities. SKCC does wish to reach an agreement with the operators but on terms that are tangible, fair to the Community, and provide security into the long-term future. Negotiations continue. 4. There is considerable dialogue in the SEI around the effect of the proposed construction on the natural environment. In general, the submission addresses the measures that will be taken to avoid disturbing wildlife, in particular areas defined as sensitive and rare and protected species. It, however, is noted as measures are offered to deal with disruptions to such areas and species, that disturbance and in some cases destruction will occur. How much disturbance and/or destruction is legally allowable and how much is reasonably acceptable? 5. A similar situation to 4. above arises from the effect the development will have on the local scenery and views. The proposed site is in the centre of a Local Authority-defined 'Area of Panoramic Quality'. What, if any, development of this kind is allowable or acceptable within such a defined zone?

The above represents a summary of the issues raised. Full details of the consultation responses are available on the Council's Public Access System and the Energy Consents website by clicking on the following links: <http://www.argyll->

3.0 REPRESENTATIONS IN RESPONSE TO AEI

- 3.1 As this is not a planning application the Energy Consent Department's web page is where the full and formal record of representations must be recorded and not the Council's public access system. All representations can be found on the Scottish Government Webpage related to this application which provides the up-to-date listing of third party representations and other submissions relating to this S36 application. No further letters of representation have been forwarded to Officer's from the Energy Consents Unit in response to the SEI, they therefore remain as detailed in the previous committee report (15th December 2017) and Supplementary Report (22nd January 2018).

4.0 UPDATED POLICY ASSESSMENT

- 4.1 The previous committee report was dated 15th December 2017 and Supplementary Report 1 was dated 22nd January 2018. In light of the time which has lapsed since the proposal was first considered, and the further consultation exercise which has been undertaken, it is deemed prudent to do an updated policy assessment. This can be viewed at Appendix A to this report. Key Policies, Supplementary Policies and all other relevant material considerations which have been taken into account are detailed below.
- 4.2 List of all Development Plan Policy Considerations taken into account in assessment of the application.

Argyll & Bute Local Development Plan (2015)

LDP STRAT 1 – Sustainable Development

LDP DM 1 – Development within the Development Management Zones

LDP 3 – Supporting the Protection, Conservation and Enhancement of our Environment

LDP 4 – Supporting the Sustainable Development of our Coastal Zone

LDP 5 – Supporting the Sustainable Growth of our Economy

LDP 6 – Supporting the Sustainable Growth of Renewables

LDP 8 – Supporting the Strength of Our Communities

LDP 9 – Development, Setting, Layout and Design

LDP 10 – Maximising our Resources and Reducing our Consumption

LDP 11 – Improving our Connectivity and Infrastructure

Supplementary Guidance in the Argyll and Bute Local Plan

SG LDP ENV 1 – Development Impact on Habitats, Species and our Biodiversity

SG LDP ENV 2 – Development Impact on European Sites

SG LDP ENV 4 – Impact on Sites of Special Scientific Interest (SSSIs) and National Nature Reserves

SG LDP ENV 5 – Development Impact on Local Nature Conservation Sites (LNCS)
 SG LDP ENV 6 – Development Impact on Trees/Woodland
 SG LDP ENV 7 – Water Quality and the Environment
 SG LDP ENV 9 – Development Impact on Areas of Wild Land
 SG LDP ENV 10 – Geodiversity
 SG LDP ENV 11 – Protection of Soil and Peat Resources
 SG LDP ENV 12 – Development Impact on National Scenic Areas (NSA's)
 SG LDP ENV 13 – Development Impact on Areas of Panoramic Quality (APQs)
 SG LDP ENV 14 – Landscape
 SG LDP ENV 15 – Development Impact on Historic Gardens and Designed Landscapes
 SG LDP ENV 16(a) – Development Impact on Listed Buildings
 SG LDP ENV 19 – Development Impact on Scheduled Ancient Monuments (SAMs)
 SG LDP ENV 20 – Development Impact on Sites of Archaeological Importance
 SG LDP Sustainable – Sustainable Siting and Design Principles
 SG LDP SERV 2 – Incorporation of Natural Features/Sustainable Drainage Systems (SuDS)
 SG LDP SERV 3 – Drainage Impact Assessment (DIA)
 SG LDP SERV 5(b) – Provision of Waste Storage and Collection Facilities within New Development
 SG LDP SERV 6 – Private Water Supplies and Water/Waste Conservation
 SG LDP SERV 7 – Flooding and Land Erosion – The Risk Framework for Development
 SG LDP TRAN 1 – Access to the Outdoors
 SG LDP TRAN 2 – Development and Public Transport Accessibility
 SG LDP TRAN 4 – New & Existing, Public Roads & Private Access Regimes
 SG LDP TRAN 5 – Off-site Highway Improvements
 SG LDP TRAN 6 – Vehicle Parking Provision
 SG LDP TRAN 7 – Safeguarding of Airports
 SG LDP REC/COM – Safeguarding and Promotion of Sport, Leisure, Recreation, Open Space and Key Rural Services
 Supplementary Guidance 2 (December 2016)
 Supplementary Guidance 2 – Wind farm map 1
 Supplementary Guidance 2 – Wind farm map 2

Note: The above supplementary guidance has been approved by the Scottish Government. It therefore constitutes adopted policy. The Full Policies are available to view on the Council's Web Site at www.argyll-bute.gov.uk

4.3 Updated list of all other material planning considerations taken into account in the assessment of the application, having due regard to Annex A

- National Planning Policy Framework 3 (NPF3), Scottish Government (June 2014)
- Scottish Planning Policy (SPP), Scottish Government (June 2014)
- The future of energy in Scotland: Scottish Energy Strategy, Scottish Government (December 2017)
- Onshore wind policy statement, Scottish Government (December 2017)
- Argyll and the Firth of Clyde Landscape Character Assessment, SNH (1996)

- Siting and Designing Wind Farms in the Landscape Guidance, SNH (August 2017)
- Argyll and Bute Landscape Wind Energy Capacity Study, SNH & A&BC (2017)
- Control of Woodland Removal Policy, FCS (2009)
- Scottish Historic Environment Policy, HES (June 2016)
- Shared Ownership of Renewable Energy Developments, consultation, Scottish Government, November 2018
- Views of statutory and other consultees
- Legitimate public concern or support expressed on relevant planning matters.

5.0 CONCLUSION

- 5.1** The contents of the SEI relates to minor amendments to the location of some on site infrastructure components and additional information requested by consultees including Scottish Natural Heritage, Forestry Commission Scotland, AM Geomorphology and the Royal Society for the Protection of Birds Scotland.
- 5.2** It is acknowledged that the detail provided in the SEI addresses some of the requests for additional information/further clarification from Scottish Natural Heritage, Forestry Commission Scotland, AM Geomorphology and the Royal Society for the Protection of Birds. Albeit it is noted that the RSPB have not objected but still have concerns which should be addressed by the Energy Consents Unit prior to reaching a decision on the proposal.
- 5.3** It is further acknowledged that the additional detail provided in the SEI, in the form of the additional viewpoint from Gigha, visualisations showing darker turbines, and amendment to the Forestry Plan to try and address SNH and the Council's concern in respect to the landscape and visual impact of the proposal have been considered. It is noted that SNH continue to have the same landscape and visual concerns regarding this proposal, despite submission of the SEI. Additional consultation was undertaken with the Council's Landscape consultant on the SEI and a review was requested of the recommended reasons for objection in the original main report (given the time which has lapsed since the original report). This has resulted in a recommended amendment to the original reasons for objection which are detailed below.
- 5.4** As part of the SEI the applicant has also put forward details of a Shared Ownership proposal, including signed copies of Memorandums of understanding (MoU). This additional information has been considered in the determination of the proposal. The Scottish Government consultation draft on shared ownership of renewable energy developments - good practice principles (November 2018) has also been considered.
- 5.4** In conclusion, whilst, the SEI addresses some of the outstanding technical concerns, introduces further information on shared ownership proposals, provides an additional viewpoint and additional visualisations (showing darker turbines), it is not considered that it presents any additional information to alter the Council's view on the significant adverse landscape and visual impact (including cumulative) of this proposal (revised following advice of the Council's Landscape Consultant).

6.0 RECOMMENDATION

6.1 There is no change to the recommendation to object to the proposal, however, following the advice of the Council's Landscape Consultant it is recommended that the reasons for objection are amended from those detailed in the main report (dated 22nd December 2017) to reflect the advice which has been provided. For ease of comparison the original reasons for refusal can be viewed at Appendix B and the amended reasons are as follows:

6.3 REVISED REASONS FOR OBJECTION TO REFLECT ADVICE OF THE COUNCIL'S LANDSCAPE CONSULTANT

1. Significant Adverse Effects on the appreciation of South Knapdale Area of Panoramic Quality (APQ)

Argyll and Bute Council will resist any development in, or affecting, Areas of Panoramic Quality where its scale, location or design will have a significant adverse impact on the character of the landscape unless it is adequately demonstrated that any significant adverse effects on the landscape quality for which the area has been designated are clearly outweighed by social, economic or environmental benefits of community wide importance. Argyll and Bute Council will also resist renewable energy developments where these are not consistent with the principles of sustainable development and it has not been adequately demonstrated that there would be no unacceptable significant adverse landscape and visual impacts, whether individual or cumulative.

The proposed wind farm would be located within the Knapdale Area of Panoramic Quality (APQ). There is no detailed assessment of the special qualities of the APQ in the Environmental Statement. The Environmental Statement presumes that the APQ is '*designated for its outwards looking views*'. Despite the applicant's rebuttal stressing the strategic nature of the Argyll and Bute Landscape Wind Energy Capacity Study, their landscape consultants appear to rely on the information provided in this study rather than providing a detailed assessment of the special qualities of the APQ. This is contrary to the guidance on local landscape designations set out in Scottish Planning Policy and the Guidelines for Landscape and Visual Impact Assessment, third edition. There is no citation for this designated landscape although its key qualities are likely to comprise:

- Fragmented rocky coasts and a varied seascape which includes the narrow confined West Loch Tarbert as well as the more open sea basin bounded by Knapdale, Gigha, Islay and Jura
- The diversity of landscapes including knolly coastal fringes richly patterned with woodland, pockets of farmland, wetland and largely traditional buildings and backed by undulating forested slopes and open well-defined hills. The landscape has a secluded timeless quality, accessed only by a single-track road and sparsely settled, contributing to the specialness of this APQ.
- Dramatic views west from the APQ over the sea focussing on Jura and Islay but also views to the APQ particularly from the south where the intricate coastal fringes, forested middle ground and open high hills, including the shapely Meall Reamhar, are seen scenically juxtaposed with West Loch Tarbert and the sea.

- The wider setting this scenic landscape provides to the Knapdale National Scenic Area (NSA)

The proposal would be visible from west Kintyre, the northern part of Gigha (additional Viewpoint 15) and (extensively) offshore. Views from these areas tend to focus on the arresting profile of Jura but south Knapdale forms part of an extensive scenic panorama of little developed coast, settled fringes, forested and open uplands. It is considered that the proposal would be likely to incur significant adverse impacts on the appreciation of the Area of Panoramic Quality in views from parts of North West Kintyre, from West Loch Tarbert and other offshore areas (principally from the Islay ferry but also from recreational sailing craft).

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 local economic benefits and the achievement of climate change related commitments.

Having due regard to the above it is considered that the proposal will have significant adverse impacts on the Knapdale Area of Panoramic Quality contrary to the provisions of SG LDP ENV 13 – Development Impact on Areas of Panoramic Quality (APQs); SG LDP ENV 14 – Landscape; Supplementary Guidance 2: Renewable Energy; LDP STRAT 1 – Sustainable Development; LDP DM1 – Development within the Development Management Zones; LDP 3 – Supporting the Protection, Conservation and Enhancement of our Environment; and LDP 6 – Supporting the Sustainable Growth of Renewables of the Argyll and Bute Local Development Plan; Scottish Planning Policy (2014); The future of energy in Scotland: Scottish Energy Strategy (December 2017); Onshore wind policy statement (January 2017); SNH Siting and Designing Wind Farms in the Landscape Guidance (August 2017); and Argyll and Bute Landscape Wind Energy Capacity Study, SNH and Argyll and Bute Council (2017).

2. Significant Adverse Strategic Cumulative Landscape Impact

The Council will support renewable energy developments where these are consistent with the principles of sustainable development and it can be adequately demonstrated that there would be no unacceptable significant adverse landscape and visual impacts, whether individual or cumulative.

The Srondoire and Allt Dearg wind farms are located within the *Knapdale Upland Forest Moor Mosaic* LCT. While these developments are prominent in views from the north and east in the Lochgilphead/Loch Fyne area, they are barely visible from the south-west. The proposal would introduce wind turbines into a scenic landscape (Knapdale) where there are currently no wind farms unlike the Kintyre peninsula which is also seen in the view.

The south Knapdale area between the high ridge of Stob Odhar to Meall Reamhar and West Loch Tarbert and west to the Kilberry area (and abutting the NSA) has a distinctive and scenic character which is unaffected by large scale development. While the richly scenic diverse coastal fringe of South Knapdale would not be dominated by

this proposal (due to distance and partial/intermittent screening), the sense of this area being undeveloped and remote (principally appreciated in views across West Loch Tarbert, the NW Kintyre coast and the sea) would be significantly diminished. The expansive and highly scenic panorama of the south/west Knapdale area and the islands of Islay/Jura contrast with the nearby Kintyre peninsula where wind farm development is a key characteristic. While wind farms could potentially be accommodated in this part of Knapdale without widespread significant landscape and visual impacts arising (due to the sparse settlement and less complex landform and vegetation cover of hill slopes) it is also important to keep the most scenic parts of Argyll and Bute free from development given the extent of wind farm development accommodated elsewhere. The scenic quality of the area is recognised by the APQ designation.

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 local economic benefits and the achievement of climate change related commitments.

Having due regard to the above it is considered that the proposal would have a significant adverse strategic landscape impact contrary to the provisions of SG LDP ENV 13 – Development Impact on Areas of Panoramic Quality (APQs); SG LDP ENV 14 – Landscape; Supplementary Guidance 2: Renewable Energy; LDP STRAT 1 – Sustainable Development; LDP DM1 – Development within the Development Management Zones; LDP 3 – Supporting the Protection, Conservation and Enhancement of our Environment; and LDP 6 – Supporting the Sustainable Growth of Renewables of the Argyll and Bute Local Development Plan; Scottish Planning Policy (2014); The future of energy in Scotland: Scottish Energy Strategy (December 2017); Onshore wind policy statement (January 2017); SNH Siting and Designing Wind Farms in the Landscape Guidance (August 2017); and Argyll and Bute Landscape Wind Energy Capacity Study, SNH and Argyll and Bute Council (2017).

3. Layout

Argyll and Bute Council will support renewable energy developments where these are consistent with the principles of sustainable development and it can be adequately demonstrated that there would be no unacceptable significant adverse landscape and visual impacts, whether individual or cumulative. Argyll and Bute Council will resist development with poor quality or inappropriate layouts.

It is considered that the layout of turbines at variable levels leads to an unsatisfactory 'jumbled' appearance evident in views from the south-west. In particular, from Viewpoint 15: Gigha North End, the layout of the wind farm is unsatisfactory with turbines appearing muddled, which contributes to an adverse impact despite the viewpoint lying some 14km away.

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 local economic benefits and the achievement of climate change related commitments.

Having due regard to the above it is considered that the layout of the turbines is unacceptable contrary to the provisions of SG LDP ENV 13 – Development Impact on Areas of Panoramic Quality (APQs); SG LDP ENV 14 – Landscape; Supplementary Guidance 2: Renewable Energy; LDP STRAT 1 – Sustainable Development; LDP DM1 – Development within the Development Management Zones; LDP 3 – Supporting the Protection, Conservation and Enhancement of our Environment; LDP 6 – Supporting the Sustainable Growth of Renewables and LDP 9 – Development Setting, Layout and Design of the Argyll and Bute Local Development Plan; Scottish Planning Policy (2014); The future of energy in Scotland: Scottish Energy Strategy (December 2017); Onshore wind policy statement (January 2017); SNH Siting and Designing Wind Farms in the Landscape Guidance (August 2017); and Argyll and Bute Landscape Wind Energy Capacity Study, SNH and Argyll and Bute Council (2017).

Report: Arlene Knox
Reviewing Officer: Sandra Davies

Date: 4th April 2019
Date: 4th April 2019

Angus Gilmour
Head of Planning, Housing and Regulatory Services

APPENDIX A: UPDATED PLANNING LAND USE AND POLICY ASSESSMENT

A. THE SECTION 36 CONSENTING REGIME

In Scotland, any application to construct or operate an onshore power generating station with an installed capacity **of over 50 megawatts (MW)** requires the consent of Scottish Ministers under Section 36 of the Electricity Act 1989. Any ministerial authorisation would include a 'deemed planning permission' and in these circumstances there is no requirement for a planning application to be made to the Council as Planning Authority. The Council's role in this process is one of a consultee along with various other consultation bodies. It is open to the Council to either support or object to the proposal, and to recommend conditions it would wish to see imposed in the event that authorisation is given by the Scottish Government. In the event of an objection being raised by the Council, the Scottish Ministers are obliged to convene a Public Local Inquiry (PLI) if they are minded to approve the proposal. They can also choose to hold a PLI in other circumstances at their own discretion. Such an Inquiry would be conducted by a Reporter(s) appointed by the Directorate for Planning and Environmental Appeals.

In the event that consent is given, either where there has been no objection from the Council, or where objections have been overruled following PLI, the Council as Planning Authority would become responsible for the agreement of matters pursuant to conditions, and for the ongoing monitoring and enforcement of such conditions. This report reviews the policy considerations which are applicable to this proposal and the planning merits of the development, the views of the bodies consulted by the Scottish Government along with other consultations undertaken by the Council, and third party opinion expressed to the Scottish Government following publicity of the application by them. It recommends views to be conveyed to the Scottish Government on behalf of the Council before a final decision is taken in the matter.

The conclusion of this report is to recommend that objection be raised to this proposal on the grounds of significantly adverse landscape, visual and cumulative impacts. It is not necessary at this point in the process to recommend conditions in the event that the project is authorised by Scottish Ministers, for if they are minded to approve the project regardless of an objection by the Planning Authority, there would be opportunity to suggest appropriate conditions as part of the Public Local Inquiry which would require to be convened in such circumstances.

B. SETTLEMENT STRATEGY

The proposed wind farm and access is located within a 'Rural Opportunity Area', 'Countryside Zone', and 'Very Sensitive Countryside' as defined by the 'Argyll and Bute Local Development Plan'. Within Rural Opportunity Areas and the Countryside Zone Policy LDP DM 1 – Development within the Development Management Zones, only supports development up to 'small scale' on appropriate sites including the open countryside as well as small scale infill, rounding-off, redevelopment and change of use of existing buildings. Only in exceptional cases, will up to and including large scale development be supported if it accords with an Area Capacity Evaluation (ACE). The policy does not however require an Area Capacity Evaluation (ACE) for renewable energy related developments which are the subject of Environmental Impact Assessment. Within Very Sensitive Countryside, encouragement is only given to specific categories of development on appropriate sites, which does include renewable energy related development. Policy LDP 6 – Supporting the Sustainable Growth of Renewables supports renewable energy developments where they are consistent with the principles of sustainable development and it can be adequately demonstrated that there would be no unacceptable significant adverse effects, whether individual or cumulative, including on local

communities, natural and historic environments, landscape character and visual amenity, and that the proposals would be compatible with adjacent land uses. For the reasons detailed below in this report, having taken the Supplementary Environmental Information into account, it is considered that this proposal does not satisfy Local Development Plan policy, and Scottish Government policy and advice in respect of wind farm development.

Having due regard to the above it is considered that the proposal is contrary to the provisions of LDP DM1 – Development within the Development Management Zones; LDP 6 – Supporting the Sustainable Growth of Renewables; Scottish Planning Policy (2014); and National Planning Framework 3

C. SUPPORTING THE SUSTAINABLE GROWTH OF RENEWABLES

Argyll and Bute Council is keen to ensure that Argyll and Bute continues to make a positive contribution to meeting the Scottish Government's targets for renewable energy generation. These targets are important given the compelling need to reduce our carbon footprint and reduce our reliance on fossil fuels. The Council will support renewable energy developments where these are consistent with the principles of sustainable development and it can be adequately demonstrated that there would be no unacceptable significant adverse effects.

D. LOCATION, NATURE AND DESIGN OF PROPOSED DEVELOPMENT

The Supplementary Environmental Information describes and assesses two minor changes to the onsite infrastructure. These relate to increased size and altered shape of the most northerly construction compound (near to the site entrance) and a new location of the onsite substation and control building; and provides details of the revised application description following amendments to the forestry plan and highway works required.

It is proposed to amend the location of the onsite control building and substation compound from its previously proposed position to directly north of Turbine 7. Whilst the control building and substation compound will have a slightly different orientation, its dimensions will remain as 100m x 60m. This amendment will place the control building and substation more centrally within the site, thus resulting in less cabling and electrical loss across the site. It is also proposed to increase in the size and shape of the northern construction compound to accommodate a number of car parking spaces to enable site workers to be transported from here south-west by bus into the main site during the construction programme, effectively creating a park and ride system. The compound remains within an area of existing hardstanding used during the construction of Allt Dearg Wind Farm.

A change is also proposed to the construction traffic route to completely avoid construction traffic passing through Tarbert, and this will effectively act as a by-pass to the town. Construction traffic will turn off the A83 south-west of Tarbert onto an unclassified road before joining the existing timber haul route (B8024). Vehicles will continue travelling north-east before re-joining the A83 north of Tarbert. Minor alterations to the public road network will be required to enable abnormal load vehicles to join and travel along the unclassified road from the A83, to travel safely along the B8024 and to route safely back onto the A83. Main road amendment required at the junction of the B8024 with the A83.

Amendments to the forestry plan include: reducing the amount of proposed felling from 160 hectares (ha) to 104ha through consultation with FCS. This has been achieved through restructuring the forestry operations to be undertaken across the site between 2019 and 2048. The Applicant also proposes to retain ridgeline planting within the West Carse landownership area to provide long term screening of the site from the south-west and east. Compensatory

planting proposals to replace forestry that will be lost to the wind farm infrastructure remains unchanged. A revised forestry plan is included at **SEI**

As a result of the required road amendments and change to the forestry plan, it has been necessary to update the Section 36 application description as registered with the ECU.

The off-site road works and changes to the forestry plan both necessitate an amendment to the redline application boundary and therefore an amendment to the application description.

The current application description for consent (Reference: ECU00000471) is:

“Construction and operation of wind farm approximately 8.4km south-west of Tarbert, Argyll and Bute, comprising 14 wind turbines (including external transformers) of up to 149.5m in height (to blade tip) – turbines currently under consideration will have a capacity of between 3.6MW and 4.2MW giving a total maximum rated capacity range for the project of between 50.4MW and 58.8MW; crane hardstandings; onsite underground electrical cables; a control building; site signage; vehicle turning circles; approximately 30.4km of access tracks (16km is existing track which will be upgraded where necessary and 14.4km is new and includes the new site access); and replanting of 129.4ha of forestry”.

This has been changed to the following:

*“Construction and operation of wind farm approximately 8.4km south-west of Tarbert, Argyll and Bute, comprising 14 wind turbines (including external transformers) of up to 149.5m in height (to blade tip) – turbines currently under consideration will have a capacity of between 3.6MW and 4.2MW giving a total maximum rated capacity range for the project in excess of 50MW; crane hardstandings; onsite underground electrical cables; a control building; site signage; vehicle turning circles; approximately 30.4km of access tracks (16km is existing track which will be upgraded where necessary and 14.4km is new and includes the new site access); replanting of **77ha of forestry; and off site road works to facilitate transportation of abnormal loads”.***

E. SPATIAL FRAMEWORK FOR WIND FARMS

Supplementary Guidance has been prepared in accordance with SPP which provides a Spatial Framework for wind farms and wind turbine developments over 50 metres high, which identifies: Group 1 - Areas where wind farms will not be acceptable (National Parks and National Scenic Areas); Group 2 - Areas of significant protection (National and International designations, other nationally important mapped environment interests including areas of wild land) and community separation distances for consideration of visual impact); and Group 3 - Areas which may have potential for wind farm development.

The area of the site encompassing the wind turbines is situated entirely within a Group 3 area. Approximately 3km of the access track to the site passes through a corner of the Knapdale National Scenic Area, a Group 1 area. It is clear when reading the detail of the SPP that the spatial frameworks referred to, are intended to apply to the wind turbine element of any proposed development and not necessarily the access tracks. Mitigating the effects of the development on the National Scenic Area by design, to limit the visibility of turbines within this area has been a key design consideration.

The same principles have been applied to the access track, which largely follows the route of existing track infrastructure already situated within the National Scenic Area. Whilst this means that a small portion of the overall Development falls within the National Scenic Area, this is not considered contrary to the spatial framework. As SPP and the resulting spatial framework focus specifically upon the wind turbine components (and tip height) the access track is not

considered to conflict with the aims of the spatial framework or SPP. Any effect on the National Scenic Area by the access track has been mitigated by routing and design.

F. NET ECONOMIC IMPACT, INCLUDING LOCAL AND COMMUNITY SOCIO-ECONOMIC BENEFITS SUCH AS EMPLOYMENT, ASSOCIATED BUSINESS AND SUPPLY CHAIN OPPORTUNITIES

Policy LDP 6 – Supporting the Sustainable Growth of Renewables, SG 2 Renewables and Scottish Planning Policy require applications for wind turbine developments to be assessed against net economic impact, including local and community socio-economic benefits such as employment, associated business and supply chain opportunities.

The Supplementary Environmental Information provides copies of a Memorandum of Understanding (MoUs) signed by Tarbert and Skipness Development Trust and Ardrishaig Community Trust, in respect of shared ownership offer to local communities.

Economic benefit is a material planning consideration and arises from procurement construction, employment and indirect benefits associated with the supply chain, accordingly economic benefit should be regarded as a factor weighing in favour of the development in the planning balance. Opportunities for job creation through the construction phase is estimated to generate 1.5 - 6 FTE (Full-Time-Equivalent) jobs will be created, with a further 2 FTE jobs during the operational phase. There will also be potential supply chain benefits during the construction phase with workers making use of local accommodation and other facilities. The estimated additional indirect employment generated by construction of the Development is therefore 3.15 to 12.6 FTEs resulting in a temporary minor (positive) effect. Once operational, the Development will require a small team of personnel to service maintain and operate it. It is predicted that 1 FTE job will be created during the lifetime of the Development (30 years). It is likely that there will be some local employment generated as an indirect result of the operation of the Development, and this will be associated with induced employment effects resulting from increased household expenditure among those individuals who have gained employment both directly and indirectly as a result of operation of the Development. In total, 5.5 FTEs are considered possible.

Community Shared Ownership - The proposed development is now being brought forward with the opportunity for community shared ownership. The preferred model for shared ownership in the project is through revenue (profit) sharing. The applicant has offered shared ownership to representative community groups within the host and adjacent Community Council areas. The shared ownership opportunity is in the form of a revenue (profit) sharing offer. Communities have been invited collectively to invest up to 10% of the development and capital costs of the wind farm (which will include turbines, civil, electrical and grid costs). In return the communities will receive the equivalent percentage of net profit from the project. A memorandum of understanding (MoU) has been developed to explain the proposed terms for the shared ownership opportunity. The MoU has been explained to community groups who have expressed an interest in the offer. Interested community groups have been asked to sign the MoU as a precursor to a more detailed agreement with a grouping of interested communities, likely to be post consent, but pre construction of the development. Local Energy Scotland has been providing independent advice and support to communities interested in the shared ownership opportunity. A copy of the MoU signed by both representative community organisations in Ardrishaig and Tarbert and Skipness are included in the SEI. To convey the shared ownership offer, the developers, on behalf of the applicant has: Attended by invite meetings of individual community councils within the Community of Interest and maintained regular contact with those communities; and Directed communities to the support and advice available to them through Local Energy Scotland (LES).

Proposed Community Benefit - In addition to the shared ownership opportunity, should the proposed development gain consent, a Community Benefit Fund would be made available to the community of interest. This is offered on the basis of a payment per MW of installed capacity at the Scottish Government recommended rate at the time of commissioning the proposed windfarm. At present the recommended rate is £5,000 per MW equivalent. At this rate the community benefit fund would equate to an annual payment of between £252,000 at the lower end of the expected installed capacity and £294,000 at the upper end of the expected installed capacity of the proposed development for up to 30 years.

Community Benefit is not considered to be a 'material planning consideration' in the determination of planning applications. In the event that permission were to be granted, the negotiation of any community benefit, either directly with the local community or under the auspices of the Council, would take place outside the application process.

Consideration has been given to the Scottish Government on Shared ownership of renewable energy developments - good practice principles: consultation (November 2018) and the guidance which it provides at section 4.2 – Decision making. The key paragraph, relevant to the consideration of this case being: "A development should be essentially capable of achieving planning permission without the benefits accruing from a shared ownership offer. A poorly designed scheme in an unsuitable location where the impacts cannot be appropriately resolved cannot be made acceptable by matters which are not material to the consideration of the application". Taking this into account, it has been concluded that whilst the potential for shared ownership is positive, the fact that the proposal will have significant adverse landscape and visual impact (including cumulative) should be the primary consideration.

Furthermore this document states that: "A planning authority could not guarantee that a shared ownership option will ultimately be established as this is an arrangement between a renewable energy business and a community. Similarly, the planning process should not be used as an opportunity to seek to compel communities to take-up a shared ownership offer when in the end it is not right for their community and aspirations".

Having due regard to the above the proposals net economic impact, including local and community socio-economic benefits such as employment, associated business and supply chain opportunities has been assessed and it is concluded that the proposal is consistent with the provisions of Supplementary Guidance 2 (December 2016); LDP DM1 – Development within the Development Management Zones; LDP 3 – Supporting the Protection, Conservation and Enhancement of our Environment; LDP 6 - Supporting the Sustainable Growth of Renewables; Scottish Planning Policy (June 2014) and the Onshore wind Policy Statement (January 2017) in this regard.

G. THE SCALE OF CONTRIBUTION TO RENEWABLE ENERGY GENERATION TARGETS

Policy LDP 6 – Supporting the Sustainable Growth of Renewables, SG 2 Renewable Energy and Scottish Planning Policy require applications for wind turbine developments to be assessed against the scale of contribution to renewable energy generation targets. The proposed development could generate between approximately 51 and 58 MW of renewable energy to the grid which is a substantial contribution to Scotland's targets. The lowest estimate of installed capacity, of 50.4MW, is estimated to produce 117,683 MWh which is enough electricity to supply the equivalent of approximately 27,035 households for a year.

Having due regard to the above the proposals scale of contribution to renewable energy generation targets has been assessed and it is concluded that the proposal is consistent with the provisions of SG 2; Supplementary LDP STRAT 1 – Sustainable Development; LDP DM1 – Development within the Development Management Zone;

LDP 3 – Supporting the Protection, Conservation and Enhancement of our Environment; LDP 6 - Supporting the Sustainable Growth of Renewables; Scottish Planning Policy (2014); and the Onshore wind Policy Statement (2017) in this regard.

H. EFFECT ON GREENHOUSE GAS EMISSIONS

Policy LDP 6 – Supporting the Sustainable Growth of Renewables, SG 2 Renewable Energy and Scottish Planning Policy require applications for wind turbine developments to be assessed against their effect on greenhouse gas emissions.

The Supplementary Environmental Information provides an assessment of effects of the Development on climate change, major accidents and disasters and human health as introduced in the 2017 EIA Regulations, given the length of time that the new Regulations have now been in force (SEI Chapter 15).

The development provides a low carbon option for energy generation and reduces the requirement to rely upon fossil fuels. The lowest estimate of installed capacity, of 50.4MW, is estimated to produce 117,683 MWh which is enough electricity to supply the equivalent of approximately 27,035 households for a year. This will potentially displace the equivalent of up to approximately 72,728 tonnes of CO₂ emissions per year from conventional forms of electricity generation.

Having due regard to the above the proposals effect on greenhouse gas emissions has been assessed and it is concluded that the proposal is therefore consistent with the provisions of SG 2 Renewable Energy; LDP STRAT 1 – Sustainable Development; LDP DM1 – Development within the Development Management Zone; LDP 3 – Supporting the Protection, Conservation and Enhancement of our Environment; LDP 6 - Supporting the Sustainable Growth of Renewables; Scottish Planning Policy (2014) and the Onshore wind Policy Statement (January 2017) in this regard.

I. IMPACTS ON COMMUNITIES AND INDIVIDUAL DWELLINGS, INCLUDING VISUAL IMPACT, RESIDENTIAL AMENITY, NOISE AND SHADOW FLICKER (INCLUDING CUMULATIVE IMPACTS).

Policy LDP 6 – Supporting the Sustainable Growth of Renewables, SG 2 Renewable Energy and Scottish Planning Policy require applications for wind turbine developments to be assessed against impacts on communities and individual dwellings, including visual impact, residential amenity, noise and shadow flicker.

The Environment Protection Officer - The main issues of concern in terms of possible amenity effects are operational noise, construction noise, air pollution (such as dust during the construction phase), lighting during the construction phase and effects upon private water supplies. The Council's Environmental Health Officer has considered the SEI and has confirmed that they have no objection or further comments subject to the originally recommended conditions relating to noise; air quality; construction environmental management plan; and private water supplies or further comments, that there is no additional supplementary information that would warrant any additional comments to Environmental Health's original response as detailed in the Main Report

Shadow Flicker - Government guidance advises that if separation (10 x rotor diameters) is provided between turbines and nearby dwellings 'shadow flicker' should not generally result in adverse effects. Under accepted good practice and guidance, this will ensure that shadow flicker will not present a problem. At the proposed development, there are no residential properties within 130 degrees of north and within ten rotor diameters (i.e. 1148 m) of the

proposed turbine locations. Shadow Flicker is therefore not a matter of concern. The Environmental Protection Officer has not raised any concerns in this regard and has no further comments to make in light of the submission of the Additional Environmental Information.

Visual Impact is addressed in the Landscape and Visual Impact section of this report below.

Having due regard to the above it is concluded that the proposal will not have any adverse impacts on communities and individual dwellings, including, residential amenity, noise and shadow flicker and is therefore consistent with the provisions of SG 2 Renewable Energy; LDP STRAT 1 – Sustainable Development; LDP DM1 – Development within the Development Management Zone; LDP 3 – Supporting the Protection, Conservation and Enhancement of our Environment; LDP 6 - Supporting the Sustainable Growth of Renewables; LDP 9 – Development Setting, Layout and Design; Scottish Planning Policy (SPP), (2014); and the Onshore Wind Policy Statement (2017) in this regard.

J. LANDSCAPE AND VISUAL IMPACTS, INCLUDING EFFECTS ON WILD LAND (INCLUDING CUMULATIVE IMPACTS)

Policy LDP 6 – Supporting the Sustainable Growth of Renewables, SG 2 Renewable Energy and Scottish Planning Policy require applications for wind turbine developments to be assessed against any landscape and visual impacts including wild land.

Supplementary Environmental Information – The Supplementary Environmental Information provides an additional viewpoint visualisation and assessment from the northern end of Gigha (in response to SNH comments); and provides additional visualisations for existing viewpoints showing darker coloured turbines.

Scottish Natural Heritage's response to SEI - SNH note that the SEI relates to a number of changes as detailed in the cover letter accompanying the SEI (dated 7th February 2019). SNH understand that there are no major changes proposed to the location, height or MW capacity input of the proposed wind farm. Two minor changes are proposed to onsite infrastructure which relate to an increased size and altered shape of the most northerly construction compound and a new location of the onsite substation and control building. SNH's advice remains that the nature and scale of the proposal cannot be accommodated in this location without significant adverse landscape and visual effects as outlined in their previous response dated 10th November 2017.

Landscape and Visual – as part of the SEI, an additional viewpoint visualisation and assessment has been undertaken from northern Gigha (VP15) as well as the production of visualisations showing darker turbines from a few selected viewpoints (VP1, VP6, VP9, F2 and VP15). A full colour study and assessment would be required should a different colour of turbine be proposed. SNH understand it is not currently proposed to change the turbine colour. The EIA text for VP12, Gigha ferry terminal states: "Receptors therefore include ferry passengers, but similar views can be seen from other parts of the island nearby", and the visual effect is not significant. In SNH's response (November 2017) to the EIA Report they advised: "*The visualisation (VP12, Gigha ferry terminal) provided to represent views from the Isle of Gigha is screened by landform (contrary to SNH guidance). This makes it difficult to draw conclusions regarding the overall effects from Gigha. SNH consider views from northern Gigha could potentially be significant.*" SNH therefore welcome the submission of an additional viewpoint from northern Gigha, which confirms that some views from Gigha (as opposed to the ferry terminal) will be significant. While the text does not indicate the effect of the proposal from further south, it is worth noting that from some locations, e.g. East Tarbert Bay, the eye is drawn to the distinctive, higher, open ridge that backdrops the proposal, with

the proposal distracting from this key feature in views across the water. SNH concur that the proposed amendments to the development and updated cumulative effects do not change the findings of their appraisal of the original assessment in the EIA Report as detailed in their response (10th November 2017). SNH agree that views from northern Gigha (VP15) are likely to be significant. SNH would also take this opportunity to highlight their original comments regarding the potential impacts of the access track and recommend the determining authority request track reinstatement and amelioration options, to minimise visual impacts and to protect the qualities of the Knapdale NSA, in the event of any consent.

Following submission of the SEI, the Council employed Carol Anderson Landscape Associates to review the landscape and visual reasons for objection, as detailed in the main report of December 2017.

Council's Landscape Consultant – following submission of the SEI the Council requested that the Council's Landscape Consultant review the SEI and the landscape and visual reasons for objection, as detailed in the main report, of December 2017. The appraisal also considers all the visual material in the Environmental Statement, Scottish Natural Heritage's consultation response (November 2017), the rebuttal to SNH's response submitted by the applicant (January 2017ⁱ), the Council's Report of Handling (December 2017) and the Council's Supplementary Report 1 (January 2018).

The proposed wind farm comprises 14 turbines ranging in size from 131m to 149.5m. There would be approximately 30km of new and upgraded access track and other ancillary development. The proposed wind farm would be located within an Area of Panoramic Quality (APQ).

The Council's reasons for objection - The Council's Report of Handling (December 2017) outlines the following key reasons for recommending objection to the proposal:

- The proposal is contrary to the guidance set out in the Argyll and Bute Landscape Wind Energy Capacity Study (ABLWECS 2017)
- Significant adverse landscape effects on parts of the *Knapdale Upland Forest Moor Mosaic* (6b) and the small scale settled '*Rocky Mosaic*' (20) Landscape Character Types (LCT) and associated seascape;
- Significant adverse visual effects in the appreciation of South Knapdale from frequented coastal locations in west Kintyre and from the Isle of Gigha where sensitive receptors in terms of transport routes, settlement and tourism/recreational assets are concentrated, and in views of South Knapdale from locations offshore;
- Significant adverse strategic cumulative landscape impact resulting from the spread of the effects of wind farm development from the Kintyre peninsula, where development is currently concentrated, across West Loch Tarbert into South Knapdale;
- Significant adverse cumulative landscape and visual effects upon the experience of Knapdale and Kintyre, particularly having regard to the combined effect with Freasdail Wind Farm which would lead to a presence of wind farm development on both sides of West Loch Tarbert.

SNH's response - The Council have been influenced in their decision on this proposal by SNH's consultation response 10th November 2017 which provides appraisal of landscape and visual effects by a specialist from their landscape team. SNH did not object but advised that the proposal could not be accommodated in this area without significant landscape and visual effects arising. SNH's key concerns can be summarised as significant adverse effects on:

- The *Knapdale Upland Forest Moor Mosaic* and the *Rocky Mosaic* LCTs.
- The regionally distinctive landscape of West Loch Tarbert.
- Views from the coast and sea
- Cumulative effects with other wind farms affecting views
- Strategic cumulative effects likely to affect experience of Knapdale and Kintyre.

SNH also advise that the proposal would be contrary to the guidance set out in ABLWECS 2017. They consider that the turbines of the proposal would be too large in relation to the distinct ridge between Stob Odhar and Meall Reachar and that the proposal would compromise the scenic setting to West Loch Tarbert. SNH further comment that there is no detailed assessment of the special qualities of the APQ in the Environmental Statement.

Review of the Council's reasons for objection – Carol Anderson's review set out below considers each of the Council's key reasons for objection set out in the Report of Handling (December 2017).

Contrary to the guidance set out in the ABLWECS - The proposed development would lie within the *Knapdale Upland Forest Moor Mosaic* (6b) identified in the 2017 ABLWECS. The *Knapdale Upland Forest Moor Mosaic* LCT already accommodates the operational Allt Dearg and Sronoire wind farms. The ABLWECS considers that opportunities may exist to locate large wind turbines in areas of lower, less complex landform set back from sensitive coastal edges and from the higher more defined ridges and pronounced summits. The sparsely settled nature of this LCT and the relatively limited visibility of parts of the interior of these uplands from surrounding settled coastal fringes reduces sensitivity.

The ABLWECS identifies a number of key landscape and visual constraints (including cumulative issues) to development associated with this LCT and these are set out in the table below with comment on the effects of the proposal

This proposal is clearly contrary to some of the guidance set out in ABLWECS. However, while this document is generally acknowledged to be a material consideration for wind farm proposals, it does not form part of Supplementary Guidance and is strategic in nature. More detailed LVIA of specific proposals also need to be considered by consultees/the determining authority when coming to a decision on acceptability.

Significant effects on landscape character - The wind farm would be sited within the *Knapdale Upland Forest Moor Mosaic* LCT. It would have significant adverse effects on this LCT. Most wind farms will incur significant adverse effects on the LCT within which they are sited so this alone would not be a reason for objection.

There will be visibility of the proposal from parts of the *Rocky Mosaic* LCT (occurring on the coastal fringes of South Knapdale, on the southern shores of West Loch Tarbert and on the west coast of Kintyre). The proposal would be seen at distances of around 4km to 10km from this LCT. ES viewpoints 3, 9, 10, 11 are located within this LCT. While there would be significant adverse visual impacts from some of these viewpoints, the character of the *Rocky Mosaic* (its small-scale character and diversity) will be less affected by the development due to it being sited within apparently simple forested hill slopes set back from the coastal fringes. The perceptual qualities associated with the *Rocky Mosaic* LCT in the Knapdale area could, however, be significantly affected as the proposal introduced large scale infrastructure in the backdrop to a landscape which is little developed and has a strong sense of seclusion. These effects are linked with effects on the special qualities of the APQ (see below).

Significant adverse effects on the appreciation of South Knapdale in views from west Kintyre, Gigha and from offshore - The proposal would be visible from west Kintyre, the northern part of Gigha (additional Viewpoint 15) and (extensively) offshore. Views from these areas tend to focus on the arresting profile of Jura but south Knapdale forms part of an extensive scenic panorama of little developed coast, settled fringes, forested and open uplands. The proposal would be located in an APQ. It is noted that the Report of Handling does not address the APQ in detail but it is assumed that the reasons for objection set out under point 2 are essentially about effects on the appreciation of the Knapdale APQ. SNH's response calls this a *regionally distinctive landscape of West Loch Tarbert area* and it is noted as being one of their key concerns. There is no citation for this designated landscape although its key qualities are likely to comprise:

- Fragmented rocky coasts and a varied seascape which includes the narrow confined West Loch Tarbert as well as the more open sea basin bounded by Knapdale, Gigha, Islay and Jura
- The diversity of landscapes including knolly coastal fringes richly patterned with woodland, pockets of farmland, wetland and largely traditional buildings and backed by undulating forested slopes and open well-defined hills. The landscape has a secluded timeless quality, accessed only by a single-track road and sparsely settled, contributing to the specialness of this APQ.
- Dramatic views west from the APQ over the sea focussing on Jura and Islay but also views to the APQ particularly from the south where the intricate coastal fringes, forested middle ground and open high hills, including the shapely Meall Reamhar, are seen scenically juxtaposed with West Loch Tarbert and the sea.
- The wider setting this scenic landscape provides to the Knapdale National Scenic Area (NSA)

The proposal would not significantly affect the character of the diverse coast and settled fringes (due to distance and relatively limited visibility from these parts of the APQ). It would also not affect views to Jura and Islay from the APQ. It would however be likely to incur significant adverse impacts on the appreciation of the APQ in views from parts of North West Kintyre, from West Loch Tarbert and other offshore areas (principally from the Islay ferry but also from recreational sailing craft). I consider that while effects on views from Gigha (Viewpoint 15) will be adverse, the proposal will lie >14km away and effects would be unlikely to be significant.

It should be noted that the ABLWECS provides only a cursory appraisal of the likely special qualities of the APQ (in the tables in Volume II). Paragraph 6.119 in the Environmental Statement presumes that the APQ is '*designated for its outwards looking views*'. Despite the applicant's rebuttal stressing the strategic nature of the ABLWECS, their landscape consultants appear to rely on the information provided in this study rather than providing a detailed assessment of the special qualities of the APQ. This is contrary to the guidance on local landscape designations set out in Scottish Planning Policy and the Guidelines for Landscape and Visual Impact Assessment, third edition.

Significant adverse strategic cumulative landscape impact - The Srondoire and Allt Dearg wind farms are located within the *Knapdale Upland Forest Moor Mosaic* LCT. While these developments are prominent in views from the north and east in the Lochgilphead/Loch Fyne area, they are barely visible from the south-west.

The south Knapdale area between the high ridge of Stob Odhar to Meall Reamhar and West Loch Tarbert and west to the Kilberry area (and abutting the NSA) has a distinctive and scenic character which is unaffected by large scale development. While the richly scenic diverse coastal fringe of South Knapdale would not be dominated by this proposal (due to distance and partial/intermittent screening), the sense of this area being undeveloped and remote (principally appreciated in views across West Loch Tarbert, the NW Kintyre coast and the sea) would be significantly diminished. The expansive and highly scenic panorama of the south/west Knapdale area and the islands of Islay/Jura contrast with the nearby Kintyre peninsula where wind farm development is a key characteristic. While wind farm could potentially be accommodated in this part of Knapdale without widespread significant landscape and visual impacts arising (due to the sparse settlement and less complex landform and vegetation cover of hill slopes) it is also important to keep the most scenic parts of Argyll and Bute free from development given the extent of wind farm development accommodated elsewhere. The scenic quality of the area is recognised by the APQ designation.

Significant cumulative landscape and visual effects - There would be significant cumulative impacts with the operational Freasdail wind farm in views from West Loch Tarbert. This would particularly affect views from the Islay Ferry and views from Dun Skeig. This proposal would not make a major contribution to cumulative sequential effects experienced from the A83. The screening provided by the high ridge between Stob Odhar to Meall Reamhar limits cumulative effects arising between this proposal and the operational Srondoire and Allt Dearg wind farms.

Landscape and visual effects of changes to the proposal - The Supplementary Environmental Information (SEI) report issued in February 2019 considers the following principal changes to the proposed development: the use of darker coloured turbines and the retention of woodland on the ridgeline between Cruach an t-Seallich to Cruach a Bhaillidh. An additional viewpoint from the north end of Gigha is also assessed in the SEI.

The SEI concludes that while the retention of woodland on the ridge would be beneficial in providing some screening of turbines it would not be sufficient to alter effects from key viewpoints 1,2, 6, 9 and 15 (effects from these viewpoints were all considered to be minor in the ES and this would not change). Similarly, it is concluded in the SEI that the use of darker turbines would reduce visibility from some views but the level of significance gauged in the ES would not change.

The Council's landscape consultant considers that the changes proposed to the scheme would not provide any noticeable improvement in terms of screening or reducing visibility. It is difficult to discern differences in turbine colour from the visualisations and because only selected viewpoints have been considered in the SEI it would be important to also consider whether any increases in visibility may occur in views where turbines were seen against the sky.

Viewpoint 15 Gigha North End. This viewpoint lies some 14km from the proposed wind farm. Although Sronnaire and Allt Dearg are theoretically visible from this viewpoint, they are barely seen. The proposal would appear to introduce wind turbines into a scenic landscape (Knapdale) where there are currently no wind farms unlike the Kintyre peninsula which is also seen in the view. The layout of the wind farm is unsatisfactory with turbines appearing muddled in this view and this contributes to an adverse impact despite the viewpoint lying some 14km away. It is however less prominent than if the turbines were sited on the very sensitive high ridge and the combination of being set down below the skyline and distance would result in impacts not being significant.

Conclusion - On the positive side, this proposal would not significantly affect the Knapdale NSA and it would also not have a significant effect on views from the A83. The location of the

proposed wind farm within a depression provides partial screening with the full height of the turbines often not seen in key views (it would be far more prominent if sited on the ridge of high open hills). Significant landscape and visual effects would be unlikely to be widespread being largely focused in the area of West Loch Tarbert. Despite this, key landscape and visual concerns are:

- Effects on the Knapdale APQ particularly appreciated from parts of West Loch Tarbert in views from the Islay Ferry and Dun Skeig, parts of the north-west Kintyre coast.
- Strategic cumulative effects – introducing large wind turbines to this part of Knapdale where the screening provided by the high ridge between Stob Odhar and Meall Reamhar prevents views of Srondoire and Allt Dearg wind farms in the West Loch Tarbert area and where this seemingly little developed area of south Knapdale contrasts with the increasingly intensive array of wind farm developments located on the Kintyre peninsula
- The layout of turbines at variable levels leads to an unsatisfactory ‘jumbled’ appearance evident in views from the south-west and the proliferation of access tracks in these uplands (>14km of new access track will be constructed) is also a concern.

The proposal is contrary to some of the guidance in the ABLWECS although it is important to note that this study also identified some potential scope for large turbines in this area (LCT 6b).

A consent for this development could open up the Knapdale area to a new wave of wind farm applications and it is an added concern that this applicant is proposing 30km of road access (upgraded and new) to service just 14 turbines. Although it is appreciated that the potential for future developments cannot be considered in a planning decision, it would not be surprising if extensions are proposed to this development soon after any consent.

The additional consultation advice from the Council’s Landscape Consultant has been taken into account and it is recommended that the previous reasons for objection be amended to reflect this more recent advice that has been provided. These are detailed in the main body of Supplementary Report 2.

Having due regard to the above it is concluded that the proposal will have adverse landscape and visual impacts (including cumulative) and is therefore contrary to the provisions of LDP ENV 13 –Development Impact on Areas of Panoramic Quality (APQs); SG LDP ENV 14 –Landscape; SG 2 Renewable Energy; LDP STRAT 1 – Sustainable Development; LDP DM1 – Development within the Development Management Zone; LDP 3 – Supporting the Protection, Conservation and Enhancement of our Environment; Policy LDP 6 – Supporting the Sustainable Growth of Renewables; LDP 9 – Development Setting, Layout and Design; of the Argyll & Bute Local Development Plan; Scottish Planning Policy (2014); Onshore wind policy statement, (2017); SNH Siting and Designing Wind Farms in the Landscape Guidance, (August 2017); and the ‘Argyll and Bute Landscape Wind Energy Capacity Study’ SNH and A&BC (2017)

K. EFFECTS ON NATURAL HERITAGE INCLUDING BIRDS (INCLUDING CUMULATIVE IMPACTS)

Policy LDP 6 – Supporting the Sustainable Growth of Renewables, SG 2 Renewable Energy and Scottish Planning Policy require applications for wind turbine developments to be assessed against any impact they may have on natural heritage including birds.

In the original main report it was noted that Forestry Commission Scotland, SNH and the RSPB required additional information and Officer's highlighted to the Energy Consent Unit that the Council would expect sufficient information to be supplied and agreed with these consultees prior to a decision being made on this application.

The Supplementary Environmental Information describes some minor amendments to the Forest Design Plan (in response to FCS request) associated with the development, including extension of the redline application boundary to the south to incorporate land under control, which is proposed for long-term tree management purposes; provides an updated cumulative ornithology assessment at the Natural Heritage Zone (NHZ) level (in response to SNH request); provides an update to Appendix 14.1: Carbon Report (in response to RSPB comments); and Provide details of peat depths at key locations requested by RSPB

Ecology

SNH are content with the information presented in the SEI in relation to the ecological aspects of the proposal. It is noted that a new traffic access route which utilises an unnamed road to join the B8024 is required to facilitate construction works in order to bypass the town of Tarbert. Road upgrade works will be required out with the existing road boundary and pre-construction checks will be undertaken prior to the removal of vegetation. It should also be noted that Himalayan balsam and American skunk cabbage are known to occur immediately adjacent to the unnamed road between the A83 and the B8024. Both of these species can spread extensively via fragments or seeds and therefore the Construction Environment and Management Plan (CEMP) must include suitable bio-control measures to prevent the spread of these invasive plant species.

Marine Scotland Science reiterates its advice that the developer establishes a robust water quality monitoring programme incorporating MSS guidelines. This monitoring programme could be secured by a suitably worded condition, should consent be granted for this development.

The Council's Local Biodiversity Officer has no further comments to make as any issues raised in the past have been dealt with by statutory consultees.

Birds

SNH - Ornithology – NHZ14 Cumulative Assessment – SNH are generally content with the updated cumulative assessment at NHZ14 level. SNH note that the Blarghour (application) and Upper Sonachan (appeal) wind farms are missing from the cumulative assessment however it is anticipated that the omission of these wind farms will not affect the overall outcome of the assessment. It is also noted that the Golden Eagle Population Model uses the previous NHZ estimate of 44 pairs of golden eagles as the starting point; however current knowledge estimates the numbers of pairs at around 54 and so the potential impacts will be slightly less than those predicted in the SEI.

SNH - Outline Conservation Management Plan – SNH are pleased that two rafts will be installed on suitable lochs for red-throated divers in addition to the black-throated diver raft which will be installed on Loch nan Torran, which forms part of the Knapdale Lochs Special Protection Area. In SNH's experience, management of Canada geese using the diver rafts may need to extend into late March/early April however care will need to be taken so as to minimise disturbance of divers that have returned to the lochs by this time. SNH are content with the other aspect detailed in the Outline Conservation Management Plan (SEI).

The Royal Society for the Protection of Birds concerns expressed in their original response (October 2017) (they did not object) were that many of the impacts from this proposal have been under-estimated and impacts on birds of conservation concern and peatland needed more consideration / mitigation. Having considered the SEI RSPB have provided the following advice:

Ornithology - Although RSPB would agree with the cumulative assessment, they still strongly advise that habitat management is required to mitigate for potential impacts. In light of this, it is good to see an Outline Conservation Management Plan (OCMP).

Black and red-throated diver – the proposal for rafts is positive, however still below the commitment RSPB sought. RSPB are disappointed that, given the SPA status, a more serious commitment to monitoring is not contained within the OCMP for the SPA – improvements in the access track are liable to result in an increase in casual visitor disturbance in the area with no way for either the landowner or SNH to improve monitoring / deal with this issue. Note – it is vital that rafts are checked and maintained pre-breeding season (ideally in March) on a yearly basis to ensure they are fit for purpose. It remains unclear from the OCMP if this will be applied. RSPB would like there to be a review of raft placement and success on a 5-year timescale to enable management changes if required throughout the lifetime of the windfarm.

Golden eagle - As previously stated, much of the site is commercial forestry of low importance for the species; breeding occurs at traditional sites and the mitigation as outlined in the SEI report to ensure no disturbance (BBPP and native scrub woodland creation) should be applied. RSPB still advise that a 3km buffer is applied to eyries with a minimum of 1km working in line of sight – however should road formation require blasting or other loud noises this should be increased. RSPB ask to be consulted in regard to the planned scrub-woodland creation within the area to the north of the wind farm for eagles and black grouse.

Black grouse - The site holds leks of regional importance. Timing of construction (to be outlined in the BBPP) should be restricted to avoid early morning and late evening works within 500m of any lek sites during the main lekking season (March-May). NB RSPB ask to be consulted in relation to any final CMP for this site.

Peatland Considerations - The fuller assessment of peat depth in regards to the proposed turbines, infrastructure and tracks is welcome. However, the overall increase in the carbon payback calculation (grid mix payback period is estimated at 3 years which is poor) **is disappointing and raises questions** as to whether this is a good site for such a proposal. RSPB advise that a condition should be attached to ensure that borrow pits are located within the forestry and therefore are limited to peat habitat that is already damaged due to planting. Ideally, they should be within areas where no peat habitat occurs, even shallow peat. RSPB recommend that consideration should be given to further micro-siting away from the deepest areas of peat, for both turbines and infrastructure, with any opportunities for peatland restoration being considered within this NHZ to reduce the carbon loss to gain ratio. It remains disappointing that more consideration has not been given to opportunities for the restoration of peatland within the site/existing forestry, in particular in areas where tree growth is restricted due to planting on sub-optimal peat habitat.

Forestry

Forestry Commission Scotland soon to be renamed Scottish Forestry advise that the SEI has addressed the majority of concerns raised in their original consultation response (9th November 2017). As a result, they do not object to the proposal, assuming that a condition is applied to any consent to ensure compensatory planting (CP) and a full forest plan is completed.

It is recommended that the ongoing concerns of the RSPB are addressed by the Energy Consents Unit prior to reaching a decision on this application.

Having due regard to the above it is concluded that the proposal will not have any adverse impacts on the natural heritage including birds and is therefore consistent with the provisions of SG LDP ENV 1 – Development Impact on Habitats, Species and Our Biodiversity (i.e. biological diversity); SG LDP ENV 6 – Development Impact on Trees / Woodland; SG LDP ENV 7 – Water Quality and the Environment; SG LDP ENV 11 – Protection of Soil and Peat Resources; SG 2 Renewable Energy; LDP STRAT 1 – Sustainable Development; LDP DM1 – Development within the Development Management Zone; LDP 3 – Supporting the Protection, Conservation and Enhancement of our Environment; Policy LDP 6 – Supporting the Sustainable Growth of Renewables of the Argyll & Bute Local Development Plan; Scottish Planning Policy; Onshore wind policy statement, Scottish Government (January 2017); The Scottish Government’s Policy on ‘Control of Woodland Removal’ (Forestry Commission Scotland 2009);

K. IMPACTS ON CARBON RICH SOILS, USING THE CARBON CALCULATOR (INCLUDING CUMULATIVE IMPACTS)

Policy LDP 6 – Supporting the Sustainable Growth of Renewables, Supplementary Guidance 2 and Scottish Planning Policy require applications for wind turbine developments to be assessed against any impact they may have on carbon rich soils, using the carbon calculator

In the original main report it was noted that AM Geomorphology required additional information and Officer’s highlighted to the Energy Consent Unit that the Council would expect sufficient information to be supplied and agreed with AM Geomorphology Ltd prior to a decision being made on this application.

The Supplementary Environmental Information provides additional information to support Appendix 7.2: Peat Stability Assessment of the EIA Report (in response to Geomorphology request). AM Geomorphology has confirmed that the additional work undertaken for the 2019 Peat Landslide Hazard Risk Assessment satisfactorily addressed the shortcomings in the 2017 PLHRA. No further revisions are required and no conditions specific to peat stability are recommended.

The Coal Authority have considered the SEI and note that the proposed wind farm would be located outside the defined coalfield and has no comments or observations to make on this project.

AM Geomorphology and the Coal Authority have been consulted on the changes proposed in the SEI and are satisfied with the additional information. In light of this it is recommended that the Council should not object to the proposal on the grounds of impacts on carbon rich soils, using the carbon calculator (including cumulative impacts)

Having due regard to the above it is concluded that the proposal will not have any adverse impacts on carbon rich soils, using the carbon calculator and is therefore consistent with the provisions of is therefore consistent with the provisions of SG LDP ENV 1 – Development Impact on Habitats, Species and Our Biodiversity (i.e. biological diversity); SG LDP ENV 11 – Protection of Soil and Peat Resources; SG 2 Renewable Energy; LDP STRAT 1 – Sustainable Development; LDP DM1 – Development within the Development Management Zone; LDP 3 – Supporting the Protection, Conservation and Enhancement of our Environment; Policy LDP 6 – Supporting the Sustainable Growth

of Renewables of the Argyll & Bute Local Development Plan; Scottish Planning Policy; Onshore wind policy statement, (January 2017).

L. PUBLIC ACCESS, INCLUDING IMPACT ON LONG DISTANCE WALKING AND CYCLING ROUTES AND THOSE SCENIC ROUTES IDENTIFIED IN THE NPF (INCLUDING CUMULATIVE IMPACTS)

Policy LDP 6 – Supporting the Sustainable Growth of Renewables, SG 2 Renewable Energy and Scottish Planning Policy require applications for wind turbine developments to be assessed against any impact they may have on public access, including impact on long distance walking and cycling routes and those scenic routes identified in the NPF.

The Supplementary Environmental Information (SEI) – does not include any additional details which would have an impact on Officer’s original conclusion in terms of impacts on public access, including impact on long distance walking and cycling routes and those scenic routes identified in the NPF (including cumulative impacts). This aside, Scotways have provided further consultation advice.

Scotways have confirmed that they have no comment to make on this application at this time.

Scotways have been consulted on the changes proposed in the SEI and have no comment to make on the proposal. In light of the fact that Scotways have not objected it is recommended that the Council should not object to the proposal on the grounds of impacts on public access, including impact on long distance walking and cycling routes and those scenic routes identified in the NPF (including cumulative impacts)

Having due regard to the above it is concluded that the proposal will not have any adverse physical impacts on public access, including impact on long distance walking and cycling routes and those scenic routes identified in the NPF and is therefore consistent with the provisions of SG 2 Renewable Energy, SG LDP TRAN 1 – Access to the Outdoors; LDP STRAT 1 – Sustainable Development; LDP DM1 – Development within the Development Management Zone; LDP 3 – Supporting the Protection, Conservation and Enhancement of our Environment; Policy LDP 6 – Supporting the Sustainable Growth of Renewables of the Argyll & Bute Local Development Plan; Scottish Planning Policy; Onshore wind policy statement, (January 2017).

M. IMPACTS ON THE HISTORIC ENVIRONMENT, INCLUDING SCHEDULED MONUMENTS, LISTED BUILDINGS AND THEIR SETTINGS (INCLUDING CUMULATIVE IMPACTS)

Policy LDP 6 – Supporting the Sustainable Growth of Renewables, SG 2 Renewable Energy and Scottish Planning Policy require applications for wind turbine developments to be assessed against any impact they may have on the historic environment, including scheduled monuments, listed buildings and their settings.

The Supplementary Environmental Information (SEI) – does not include any additional details which would have an impact on Officer’s original conclusion in terms of impacts on the historic environment, including scheduled monuments, listed buildings and their settings (including cumulative impacts). This aside, Historic Environment Scotland have provided the following further advice.

Historic Environment Scotland have reviewed the SEI provided, as well as the original EIA Report, and does not object to the proposed development. They have no additional comments to add to their previous response dated 4th October 2017.

Historic Environment Scotland have been consulted on the changes proposed in the SEI and it is noted that they continue to have no objection to the proposal. In light of the fact that Historic Environment Scotland have not objected it is recommended that the Council should not object to the proposal on the grounds of impacts on the historic environment, including scheduled monuments, listed buildings and their settings (including cumulative impacts)

Having due regard to the above it is concluded that the proposal will not have any adverse impacts on the historic environment, including scheduled monuments, listed buildings and their settings and is therefore consistent with the provisions of SG LDP ENV 15 – Development Impact on Historic Gardens and Designed Landscapes; SG LDP ENV 16(a) – Development Impact on Listed Buildings; SG LDP ENV 19 –Development Impact on Scheduled Ancient Monuments; SG LDP ENV 20 – Development Impact on Sites of Archaeological Importance; LDP 3 – Supporting the Protection, Conservation and Enhancement of our Environment; Policy LDP 6 – Supporting the Sustainable Growth of Renewables; and SG 2 Renewable Energy of the Argyll & Bute Local Development Plan; Scottish Planning Policy; the Onshore Wind Policy Statement and Historic Environment Scotland Policy (2016) in this respect.

N. IMPACTS ON TOURISM AND RECREATION (INCLUDING CUMULATIVE IMPACTS)

Policy LDP 6 – Supporting the Sustainable Growth of Renewables, SG 2 Renewable Energy and Scottish Planning Policy require applications for wind turbine developments to be assessed against any impact they may have on tourism and recreation.

The Supplementary Environmental Information (SEI) – does not include any additional details which would have an impact on tourism and recreation (including cumulative impacts). This aside, VisitScotland were consulted on the SEI.

VisitScotland has confirmed that, having considered the SEI they have no additional comments to make, They previously advised that they have no objection, their response focuses on the crucial importance of tourism to Scotland's local and national economy, and of the natural landscape for visitors and strongly recommend any potential detrimental impact of the proposal on tourism - whether visually, environmentally and economically - be identified and considered in full. VisitScotland strongly agrees with the advice of the Scottish Government – the importance of tourism impact statements should not be diminished, and that, for each site considered, an independent tourism impact assessment should be carried out. This assessment should be geographically sensitive and should consider the potential impact on any tourism offerings in the vicinity.

VisitScotland have been consulted on the changes proposed in the SEI and it is noted that they have no objection to the proposal. It is also noted that they highlight that a Tourism Impact Assessment should be undertaken. It is understood that the advice of VisitScotland in regard to the requirement for a Tourism Impact Assessment will be considered by the Energy Consents Unit. In light of the fact the VisitScotland have not objected it is recommended that the Council should not object to the proposal on the grounds of impacts on tourism and recreation (including cumulative impacts)

Having due regard to the above, it is considered that the proposals impacts on tourism and recreation and is consistent with the provisions of: SG LDP TRAN 1 – Access to the Outdoors; LDP STRAT 1 – Sustainable Development; LDP DM1 – Development within the Development Management Zone; LDP 3 – Supporting the Protection, Conservation and Enhancement of our Environment; Policy LDP 6 – Supporting the Sustainable Growth of Renewables; SG LDP ENV 12 – Development Impact on National

Scenic Areas (NSAs); SG LDP ENV 13 –Development Impact on Areas of Panoramic Quality (APQs); SG LDP ENV 14 –Landscape; and SG 2 Renewable Energy of the Argyll & Bute Local Development Plan, Scottish Planning Policy and the Onshore Wind Policy Statement in this respect.

O. AVIATION, DEFENCE AND SEISMOLOGICAL RECORDING (INCLUDING CUMULATIVE IMPACTS)

Policy LDP 6 – Supporting the Sustainable Growth of Renewables, SG 2 Renewable Energy and Scottish Planning Policy require applications for wind turbine developments to be assessed against any impact they may have on Aviation, Defence and Seismological Recording.

The Supplementary Environmental Information (SEI) – does not include any additional details which would have an impact on aviation, defence and seismological recording (including cumulative impacts). This aside, the Ministry of Defence, National Air Traffic Services, and Glasgow Prestwick Airport were consulted on the SEI.

The Ministry of Defence has confirmed that it has no objection subject to conditions to secure aviation safety lighting. In the interest of aviation safety, the MOD requests that the perimeter turbines are fitted with MOD accredited 25 candela omni-directional red lighting or infrared lighting with an optimised flash pattern of 60 flashes per minute of 200ms to 500ms duration at the highest practicable point. National Air Traffic Services has confirmed that the proposal has been examined from a technical safeguarding aspect and does not conflict with their safeguarding criteria. Accordingly, NATS has no safeguarding objection to the proposal. Glasgow Prestwick Airport has advised that as there is no change to the proposed tip height they have no objection to the proposal.

The Ministry of Defence, National Air Traffic Services and Glasgow Prestwick Airport have been consulted on the changes proposed in the SEI and have no objection subject to conditions. Providing these conditions are attached in the event that the proposal obtains planning permission it is recommended that the Council should not object to the proposal on the grounds of impacts on aviation, defence and seismological recording (including cumulative impacts)

Having due regard to the above it is concluded that the proposal will not have any adverse impacts on aviation and defence interests and seismological recording and is therefore consistent with the provisions of SG 2 Renewable Energy, Policy LDP 6 – Supporting the Sustainable Growth of Renewables and SG LDP TRAN 7 –Safeguarding of Airports of the Argyll & Bute Local Development Plan, Scottish Planning Policy and the Onshore Wind Policy Statement in this respect.

P. IMPACTS ON TELECOMMUNICATIONS, BROADCASTING INSTALLATIONS AND TRANSMISSION LINKS (INCLUDING CUMULATIVE IMPACTS)

Policy LDP 6 – Supporting the Sustainable Growth of Renewables, SG 2 Renewable Energy and Scottish Planning Policy require applications for wind turbine developments to be assessed against any impact they may have on telecommunications, broadcasting installations and transmission links.

The Supplementary Environmental Information (SEI) – does not include any additional details which would have an impact on telecommunications, broadcasting installations and transmission links (including cumulative). This aside BT and the Joint Radio Company were consulted on the SEI.

BT have confirmed that their position remains unchanged to the amended proposals, they have no objection to the proposed wind farm development. The Joint Radio Company have confirmed that the proposal is cleared with respect to radio link infrastructure operated by: The Local Electricity Utility and Scotia Gas Networks.

Both BT and the Joint Radio Company have been consulted on the changes proposed in the SEI and have no objection. It is recommended that the Council should not object to the proposal on the grounds of impacts on telecommunications, broadcasting installations and transmission links (including cumulative impacts)

Having due regard to the above it is concluded that the proposal will not have any adverse impacts on telecommunications, broadcasting installations and transmission links (including cumulative impacts) and is therefore consistent with the provisions of SG 2, Renewable Energy, Policy LDP 6 – Supporting the Sustainable Growth of Renewables of the Argyll & Bute Local Development Plan, Scottish Planning Policy and the Onshore Wind Policy Statement in this respect.

Q. IMPACTS ON ROAD TRAFFIC AND ADJACENT TRUNK ROADS (INCLUDING CUMULATIVE IMPACTS)

Policy LDP 6 – Supporting the Sustainable Growth of Renewables, SG 2 Renewable Energy and Scottish Planning Policy require applications for wind turbine developments to be assessed against any impact they may have on road traffic and adjacent trunk roads.

The Supplementary Environmental Information (SEI) – provides details of the proposed new construction traffic access arrangements and highway amendments, and associated traffic and transport and noise assessment updates.

New Construction Traffic Route – The EIA Report assessed the potential effects of increased traffic volumes on the public road network likely to be used by both HGVs and abnormal loads during construction of the development. The assessment found that the town of Tarbert, given its status as a sensitive receptor, coupled with the predicted increase in traffic to be routed through the town, could be subject to significant effects in terms of severance, pedestrian delay and amenity and dust and dirt generation. However, the preparation and implementation of a Construction Traffic Management Plan (CTMP) to seek to reduce the number of construction vehicles as well as the effect of vehicles passing through Tarbert resulted in the significant effects being reduced to not significant.

The applicant acknowledges that there are concerns regarding the volume of HGVs and Abnormal Load Vehicles that were previously proposed to route through the village of Tarbert. As a result of these concerns, a suitable alternative route via the B8024 has been identified which would provide a bypass route of Tarbert, and remove the potential significant effect previously predicted on the road network and receptors in this area. In addition, changes to the Forestry Plan have been made which reduces the amount of timber to be removed from site which will in turn reduce the overall number of HGV movements during the construction phase.

Notwithstanding this, the Applicant has considered another route to completely avoid construction traffic passing through Tarbert, and this will effectively act as a by-pass to the town. Construction traffic will turn off the A83 south-west of Tarbert onto an unclassified road before joining the existing timber haul route (B8024). Vehicles will continue travelling north-east before re-joining the A83 north of Tarbert.

Minor alterations to the public road network will be required to enable abnormal load vehicles to join and travel along the unclassified road from the A83, to travel along the B8024, and to route safely back onto the A83 from the B8024, and these are described in the SEI. It should be noted that the application redline boundary has been amended to include these highway works, as shown in the SEI. The SEI also details the main road amendment required for vehicles re-joining the A83 from the B8024. Traffic management measures are also proposed to manage vehicles as they turn off the A83 onto the unclassified road and as they re-join the A83 from the B8024. It has been necessary, as part of this SEI, to assess the traffic and transport effects on receptors along the by-pass route and this is also presented in the SEI.

Both Transport Scotland and the Councils Area Roads Engineer have been consulted on the revised proposal and have provided the following comments:

Transport Scotland – advise that in considering the comments provided within their most recent response, their previous response dated 10 October 2017 should be referenced.

Trunk Road Access - Transport Scotland would highlight that the August 2017 revision of the Planning Statement advised the intention to route abnormal loads associated with the construction period for the proposed development from the Port of Campbeltown along the A83 (T) through Tarbert to the proposed site access track in the vicinity of Stronachullin Farm. Within the revised Planning Statement, dated February 2019, it is proposed that abnormal loads and HGVs will bypass Tarbert utilising the B8024. To achieve this, a number of amendments will need to be made to the existing A83 (T) junctions providing B8024 access either side of Tarbert. This included the proposal to provide “an off-line track which effectively removes the left turn at the existing junction and replaces this with a merge to the A83 for the abnormal loads vehicles”. Transport Scotland acknowledge that details of this proposal are illustrated in the SEI. The Planning Statement notes that “the off-line track will only be in use for abnormal loads and will be controlled by the escort vehicles and personnel during deliveries to ensure vehicles merge safely with the A83. The off-line road will be closed and gated when not in use”.

In consideration of this, Transport Scotland would advise that the information provided in support of the proposed A83 (T) access arrangements does not sufficiently detail the operation of the proposed amended junction layouts, or how existing traffic utilising these sections of the road network would be accommodated. While it is acknowledged that SEI has been provided to further illustrate the proposals, the level of detail provided within this figure is considered inadequate by Transport Scotland.

Transport Scotland welcome the proposal for abnormal loads and HGVs associated with the proposed development to bypass Tarbert and consider this advisable in the context of this application. However, to ensure that the safety and operation of the trunk road network is not undermined by the proposed measures, detailed junction layouts and sufficient supporting information is required to be submitted for approval by Transport Scotland prior to the commencement of the construction period. This requirement should be conditioned as part of any consent.

Transport Scotland does not object to the proposal subject to conditions to ensure that: the proposed trunk road accesses shall be constructed to a layout and type (and method) of construction to be approved by the Planning Authority, after consultation with Transport Scotland, as the Trunk Roads Authority, before the development is commenced. Reason: To minimise interference with the safety and free flow of the traffic on the trunk road; The proposed route for any abnormal loads on the trunk road network must be approved by the trunk roads authority prior to the movement of any abnormal load. Any accommodation

measures required including the removal of street furniture, junction widening, traffic management must similarly be approved. Reason: To maintain safety for both the trunk road traffic and the traffic moving to and from the development; Any additional signing or temporary traffic control measures deemed necessary due to the size or length of loads being delivered must be undertaken by a recognised Quality Assured traffic management consultant, to be approved by the trunk road authority before delivery commences. Reason: To ensure that the transportation of abnormal loads will not have any detrimental effect on the trunk road network; A Construction Traffic Management Plan (CTMP) which considers cumulative impacts due to committed developments shall be prepared by the Applicant and approved by the Local Authority, in consultation with Transport Scotland, prior to the commencement of the construction period. Reason: To minimise interference with the safety and free flow of the traffic on the trunk road; There shall be no drainage connections to the trunk road drainage system. Reason: To ensure that the efficiency of the existing drainage network is not affected and that the standard of construction is commensurate with that required within the road boundary; All HGVs transporting material to and from the site shall be sheeted and required to pass through a wheel washing facility prior to exiting the site. Reason: To ensure that material from the site is not deposited on the trunk road to the detriment of road safety; and Prior to any decommissioning of the development a Decommissioning Plan shall be prepared and approved in writing by Transport Scotland as Trunk Road Authority. Reason: To minimise interference with the safety and free flow of the traffic on the trunk road.

The Council's Roads Engineer has considered the SEI and notes that the site is accessed from the A83 Tarbert –Campbeltown Trunk Road and advises that Transport Scotland should be notified. Furthermore that the applicant proposes to use a section of the B8024 Kilberry Road and C23 Glenakill Road for the transportation of abnormal loads. The Area Roads Engineer does not object to the proposal subject to conditions to ensure that: all construction traffic will access the site directly from the A83 Tarbet – Campbeltown Trunk Road; no work shall start until such time as the applicant has provided full details of the proposed alterations to the B8024 Kilberry Road and C23 Glenakill Road, for approval in writing by Roads & Amenity Services; the section of the B8024 Kilberry Road and C23 Glenakill Road will be used for the transportation of abnormal loads only; the applicant to provide a Traffic Management Plan for the transportation of abnormal loads over the section of the B8024 Kilberry Road and C23 Glenakill Road; no construction traffic will be permitted on the B8024 Kilberry Road, south of the junction with the C23 Glenakill Road without a written agreement with Argyll & Bute Council, Roads & Amenity Services; and a condition survey of the section of the B8024 Kilberry Road and C23 Glenakill Road being used for the transportation of abnormal loads to be carried out prior to the transportation of the first abnormal load - full details to be provided and agreed with Argyll & Bute Council, Roads & Amenity Services. The Area Roads Engineer also advises that a Road Opening Permit will be required and that no surface water will be allowed to discharge onto the public road.

Both Transport Scotland and the Council's Area Roads Engineer have been consulted on the changes proposed in the SEI and have no objection subject to conditions. Providing these conditions are attached in the event that the proposal obtains planning permission it is recommended that the Council should not object to the proposal on the grounds of impacts on road traffic and adjacent trunk roads (including cumulative impacts).

Having due regard to the above it is concluded that the proposal will not have any adverse impacts on road traffic and adjacent trunk roads and is therefore consistent with the provisions of SG2 Renewable Energy, Policy LDP 6 – Supporting the Sustainable Growth of Renewables; SG LDP TRAN 4 – New and Existing, Public Roads

and Private Access Regimes of the Argyll & Bute Local Development Plan, Scottish Planning Policy and the Onshore Wind Policy Statement in this respect.

R. EFFECTS ON HYDROLOGY, THE WATER ENVIRONMENT AND FLOOD RISK (INCLUDING CUMULATIVE IMPACTS)

Policy LDP 6 – Supporting the Sustainable Growth of Renewables, Supplementary Guidance 2: Renewable Energy and Scottish Planning Policy require applications for wind turbine developments to be assessed against effects on hydrology, the water environment and flood risk. The effects on hydrology, the water environment and flood risk are considered within the EIA Report and SEI. Application of good practice measures within the development's design has aided the avoidance of significant effects related to the water environment. Cognisance of these features has allowed the design to incorporate drainage features and where infrastructure is likely to interact with such features, the necessary design and permits will be confirmed at the detailed design stage. At time of writing no response has been received from the Council's Flood Risk Assessor.

Having due regard to the above it is concluded that effects on hydrology, the water environment and flood risk have been considered and the proposal is therefore consistent with the provisions of SG 2 Renewable Energy, Policy LDP 6 – Supporting the Sustainable Growth of Renewables of the Argyll & Bute Local Development Plan, Scottish Planning Policy and the Onshore Wind Policy Statement in this respect.

S. THE NEED FOR CONDITIONS RELATING TO THE DECOMMISSIONING OF DEVELOPMENTS, INCLUDING ANCILLARY INFRASTRUCTURE, AND SITE RESTORATION (INCLUDING CUMULATIVE IMPACTS)

Policy LDP 6 – Supporting the Sustainable Growth of Renewables, Supplementary Guidance 2: Renewable Energy and Scottish Planning Policy require applications for wind turbine developments to be assessed against the need for conditions relating to the decommissioning of developments, including ancillary infrastructure, and site restoration.

Should Scottish Ministers be minded to support the proposal a requirement for decommissioning and site restoration should be included in any conditions recommended by the Council, which would be triggered by either the expiry of the permission, or if the project ceases to operate for a specific period. This would ensure that at the end of the proposal's operational life the turbines would be decommissioned and principal elements removed; the site would be restored to its former use leaving little if any visible trace of the turbines; the foundations, new tracks and hardstandings would be covered over with topsoil and reseeded; the cables would be de-energised and left in place, and any cables marker signs removed; and the electrical substation building would be demolished to ground level with the foundation covered with topsoil and reseeded. The applicant notes that, whilst this policy criteria has been considered, this is primarily directed toward decision makers and therefore conditions relating to the decommissioning of the wind farm are likely to be applied as relevant. The applicant is willing to discuss the provision of any conditions which are deemed necessary.

Having due regard to the above it is concluded that the need for conditions relating to the decommissioning of developments, including ancillary infrastructure, and site restoration has been considered and the proposal is therefore consistent with the provisions of SG 2 Renewable Energy, Policy LDP 6 – Supporting the Sustainable Growth of Renewables of the Argyll & Bute Local Development Plan, Scottish Planning Policy and the Onshore Wind Policy Statement in this respect.

T. OPPORTUNITIES FOR ENERGY STORAGE (INCLUDING CUMULATIVE IMPACTS)

Policy LDP 6 – Supporting the Sustainable Growth of Renewables, Supplementary Guidance 2: Renewable Energy and Scottish Planning Policy require applications for wind turbine developments to be assessed against any opportunities for energy storage which exist. The Planning Statement states that: “Whilst energy storage is not considered part of the current Development, EDF are actively involved in the development of energy storage proposals throughout the UK and may wish to discuss potential for future energy storage opportunities at a later stage.

Having due regard to the above it is concluded that opportunities for energy storage have been considered and the proposal is therefore consistent with the provisions of SG 2 Renewable Energy, Policy LDP 6 – Supporting the Sustainable Growth of Renewables of the Argyll & Bute Local Development Plan, Scottish Planning Policy and the Onshore Wind Policy Statement in this respect.

U. THE NEED FOR A ROBUST PLANNING OBLIGATION TO ENSURE THAT OPERATORS ACHIEVE SITE RESTORATION (INCLUDING CUMULATIVE IMPACTS)

Policy LDP 6 – Supporting the Sustainable Growth of Renewables, Supplementary Guidance 2: Renewable Energy and Scottish Planning Policy require applications for wind turbine developments to be assessed against the need for a robust planning obligation to ensure that operators achieve site restoration. This matter can be covered by planning conditions or a legal agreement consistent with other projects across Argyll & Bute in the event that the proposed development obtains planning permission. The Applicant has confirmed that they have given consideration to the potential requirement for planning obligations to be arranged and expects that this will form part of the consent particulars for discussion.

Having due regard to the above it is concluded that the need for a robust planning obligation to ensure that operators achieve site restoration (including cumulative impacts) have been considered and the proposal is therefore consistent with the provisions of SG 2 Renewable Energy, Policy LDP 6 – Supporting the Sustainable Growth of Renewables of the Argyll & Bute Local Development Plan, Scottish Planning Policy and the Onshore Wind Policy Statement in this respect.

V. SCOTTISH PLANNING POLICY, THE SCOTTISH ENERGY STRATEGY & ONSHORE WIND POLICY STATEMENT 2017

Scottish Planning Policy (2014) - SPP 2014 advises that wind farms should only be supported in locations where the technology can operate efficiently and environmental and cumulative impacts can be satisfactorily addressed. Furthermore, that criteria for determining wind farm proposals varies depending on the scale of proposal and its relationship to the characteristics of the surrounding area, but usually includes: landscape and visual impact, effects on the natural heritage and historic environment, contribution of the development to renewable energy generation targets, effect on the local and national economy and tourism and recreation interests, benefits and disbenefits for communities, aviation and telecommunications, noise and shadow flicker, and cumulative impact. Finally, that the design and location of any wind farm should reflect the scale and character of the landscape and the location of turbines should be considered carefully to ensure that the landscape and visual impact is minimised.

The Scottish Energy Strategy (SES) 2017 - The SES was published in December 2017 and sets out the Scottish Government’s strategy through to 2050, marking a ‘*major transition*’ over the next three decades in terms of energy management, demand reduction and generation. The SES sets two new targets for the Scottish energy system by 2030: The equivalent of 50% of the energy for Scotland’s heat, transport and electricity consumption to be supplied from

renewable sources; and, an increase by 30% in the productivity of energy use across the Scottish economy. The SES recognises that reaching the 50% target by 2030 'will be challenging' but the target demonstrates 'the Scottish Government's commitment to a low carbon energy system and to the continued growth of the renewable energy sector in Scotland'.

These energy and climate change goals mean that onshore wind must continue to play a vital role in Scotland's future – helping to decarbonise our electricity, heat and transport systems, boosting our economy, and meeting local and national demand.

The Statement goes on to state that: *'This means that Scotland will continue to need more onshore wind development and capacity, in locations across our landscapes "where it can be accommodated"'*.

'Onshore Wind Policy Statement' (December 2017) – The onshore wind policy statement sets out the Scottish Government's position on onshore wind and supports the aims of the Scottish Energy Strategy:

"The Scottish Government acknowledges the way in which wind turbine technology and design is evolving, and fully supports the delivery of large wind turbines in landscapes judged to be capable of accommodating them without significant adverse impacts".

Having due regard to the above it is considered that the proposal is contrary to the provisions of the Scottish Planning Policy (2014) Scottish Energy Strategy 2017 and Onshore Wind Policy Statement 2017, in that it cannot constitute 'sustainable development', as it is considered that it cannot be accommodated on the chosen site without significant adverse landscape and visual impacts on nationally and locally designated landscapes (National Scenic Area and Area of Panoramic Quality) contrary to the provisions of these documents, which represent the Scottish Governments most up to date position on this type of development.

APPENDIX B - ORIGINAL RECOMMENDED REASONS FOR OBJECTION

1. The proposal lies in the Upland Forest Moor Mosaic (UFMM) (6b) landscape type (LCT) identified in the 'Argyll and Bute Landscape Wind Energy Capacity Study' (LWECS 2017) which has established that this LCT has an overall 'high sensitivity' to Very Large typology wind turbines and affords no scope to accommodate them. The area in which the proposal is located forms the landscape backdrop to the coastal, small scale, settled Rocky Mosaic LCT and to views across the scenic West Loch Tarbert area. The proposal lies within the western part of this area which is designated an Area of Panoramic Quality (Knapdale APQ). This landscape also forms the backdrop to the adjacent Knapdale National Scenic Area (NSA).

In this location, there are a number of landscape characteristics increasing sensitivity to large or very large turbines, including the scale, complexity of landform, visual sensitivity, and landscape context. The close proximity of the development to the highly sensitive coastal landscape (Rocky Mosaic LCT) and intrusion into the landscape of South Knapdale as appreciated from locations across West Loch Tarbert, and across the sea from locations in West Kintyre and from Gigha, are key constraints. At 149.5m to blade tip the turbines will appear out of scale/too large in relation to the higher open ridge to the north-east and distract from the landscape setting of West Loch Tarbert (as represented by VP 9 Dun Skeig). These uplands currently form an uncluttered backdrop to the scenic West Loch Tarbert Area and the introduction of development at this scale would compromise this composition and significantly detract from the contribution South Knapdale makes to the experience of West Loch Tarbert (as represented by VP 10 Ronachan) and the appreciation of this area across the water (as represented by VP F2 from the Islay-Jura ferry).

The number and size of the turbines proposed would therefore have a significant adverse effect upon the character, qualities and experience of the landscape within areas of the Upland Forest Moor Mosaic (6b) and the smaller scaled and settled 'Rocky Mosaic' (20) landscape character types and associated seascape. This would be clearly contrary to the guidance set out in the 'Argyll and Bute Landscape Wind Energy Capacity Study, 2017'.

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 local economic benefits and the achievement of climate change related commitments.

Having due regard to the above it is considered that this proposal is inconsistent with the provisions of the Scottish Planning Policy; Scottish Government's Onshore wind turbine planning advice (May 2014); 'Onshore Wind Policy Statement (December 2017); 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 and Bute Local Development Plan (adopted 2015) and Supplementary Guidance: SG LDP ENV 13 – Impact on Areas of Panoramic Quality (APQs); and the conclusions of the 'Argyll and Bute Landscape Wind Energy Capacity Study'(LWECS) 2017.

2. There is extensive visibility of the proposal from the West Loch Tarbert area, the wider seascape (including islands) and from part of the west coast of Kintyre. Development on the scale proposed would intrude in scenic views from these locations and would

compromise the contribution South Knapdale makes to the landscape setting of West Loch Tarbert in particular. It would pose significant adverse effect on views from the Islay – Jura ferry (as represented by VP F2) and would extend the influence of wind farm development upon the Isle of Gigha from locations to the east within Kintyre, to also include this additional location to the north. The proposal's significant visual effects would include popular and scenic walking routes including part of the Kintyre Way (as represented by VP 10 Ronachan), the walk to Dun Skeig (as represented by VP 9 Dun Skeig), coastal locations popular for recreation on the north-west coast of Kintyre and around the West Loch Tarbert area, and would include views from the Islay/Jura ferry and recreational watercraft. In addition to the inappropriate scale of the turbines, the design results in a poor layout and image of some locations (as represented by VP 3) where there is a considerable variation in turbine position/height.

The proposal would therefore lead to significant adverse visual effects in the appreciation of South Knapdale from frequented coastal locations in west Kintyre and from the Isle of Gigha where sensitive receptors in terms of transport routes, settlement and tourism/recreational assets are concentrated, and in views of South Knapdale from locations offshore. This would be clearly contrary to the guidance set out in the 'Argyll and Bute Landscape Wind Energy Capacity Study' 2017.

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

Having due regard to the above, it is considered that this proposal is therefore inconsistent with the provisions of the Scottish Planning Policy and Scottish Government's wind turbine planning advice (May 2014); Onshore Wind Policy Statement (December 2017); Policies LDP STRAT 1 – Sustainable Development; LDP DM1 – 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 and Bute Local Development Plan (adopted 2015) and Supplementary Guidance: SG LDP ENV 13 – Impact on Areas of Panoramic Quality (APQ's); and the Argyll and Bute Landscape Wind Energy Capacity Study (LWECS) 2017.

3. The proposal would result in the spread of the effects of wind farm development from the Kintyre peninsula, where development is currently concentrated, across West Loch Tarbert into Knapdale, thereby posing significant adverse cumulative effects on the experience of Knapdale and Kintyre. The uplands of Knapdale presently provide an important uncluttered backdrop to, and contribute to the scenic composition of West Loch Tarbert. This proposal would extend the influence of very large scale wind turbine development to the northern side of West Loch Tarbert, thereby reducing the distinctiveness of the Knapdale landscape and the contribution which it makes to the setting of sensitive coastal areas valued for their scenic qualities. In particular, it would impinge on the dramatic coastal panoramas of the Paps of Jura as experienced from west Kintyre where they are first revealed (Clachan and Ronachan).

This change to the established pattern of development, and the spread of development into a new area would also be experienced from locations offshore, particularly from the Isle of Gigha and from key ferry routes. Significant adverse cumulative visual effects would occur from offshore, and from parts of Gigha as represented by VP 12 the sea and West Loch Tarbert as represented by the Islay – Jura ferry view (F2)

where, in combination with Freasdail Wind Farm, wind farms would then have an unwelcome presence on both sides of West Loch Tarbert.

These significant adverse cumulative landscape and visual effects would be clearly contrary to the guidance set out in the Argyll and Bute Landscape Wind Energy Capacity Study 2017.

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 local economic benefits and the achievement of climate change related commitments.

Having due regard to the above, it is considered that this proposal is therefore inconsistent with the provisions of the Scottish Planning Policy; Scottish Government's Onshore wind turbine: planning advice (May 2014); Onshore Wind Policy Statement (December 2017); 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 and Bute Local Development Plan (adopted 2015) and Supplementary Guidance: SG LDP ENV 13 – Impact on Areas of Panoramic Quality (APQ's) and the Argyll and Bute Landscape Wind Energy Capacity Study (LWECS) 2017.