

Argyll and Bute Council
Development and Economic Growth

This Supplementary report is a recommended response to the Scottish Government's Energy Consents and Deployment Unit (ECDU) Section 36 consultation on Additional Information received regarding the proposed Rowan wind farm on Land Approximately 4.5km North West of Tarbert, Argyll & Bute

Reference No: 22/00385/S36

Planning Hierarchy: Electricity Act Section 36 consultation

Applicant: The Scottish Government on behalf of EnergieKontor UK Ltd

Proposal: Electricity Act Section 36 consultation relevant to Rowan Wind Farm

Site Address: Land Approximately 4.5km North West of Tarbert, Argyll & Bute

SUPPLEMENTARY REPORT NO. 1

1. INTRODUCTION

Since completion of the Report of Handling, correspondence has been received from the Applicant, highlighting concerns that they have about the way the report deals with several issues. An error has also been identified by Officers on the title page. These matters are addressed below.

2. ERROR ON TITLE PAGE

There is an editing error on the title page, which refers to Narachan wind farm, instead of Rowan wind farm:

"This report is a recommended response to the Scottish Government's Energy Consents and Deployment Unit (ECDU) Section 36 consultation regarding the proposed Narachan wind farm on land east of Tayinloan, Argyll & Bute"

This should read:

"This report is a recommended response to the Scottish Government's Energy Consents and Deployment Unit (ECDU) Section 36 consultation regarding the proposed Rowan wind farm on Land Approximately 4.5km North West of Tarbert, Argyll & Bute"

Officers apologise for this error.

3. APPLICANTS COMMENTS ON ERROR ON PAGE 19 OF PPSL REPORT

An error has been identified by the Applicant on page 19 where it is stated that the turbines are 277.5m tall:

"Figure 3.2: Typical Turbine Elevations shows a hub height of 200m and a rotor diameter of 155m, this would give an overall height of 277.5m"

This is incorrect, the turbines would be 200m to blade tip. Officers apologise for this editing error and would confirm that this sentence should have been deleted from the report prior to circulation. The correct height is referenced throughout the remainder of the report.

4. APPLICANT'S COMMENTS ON PROBLEM WITH HYPERLINK ON PAGE 29 OF PPSL REPORT

The Applicant has advised that on page 29 of 45, a fundamental part of our case and really the only point of contention – limited element of the southern shore of WLT, the response to the Council's Landscape Consultant and the updated ZTV and sequential assessment does not work as a hyperlink.

In the interests of balance the Applicant has asked that their written response is replicated in full (as the Council's landscape consultant's has been) within the Committee Report to provide the Committee with full context and for them to decide which assessment they prefer. The Applicant has advised that if the Committee do not have clear and urgent sight of their written response either (preferably) replicated in full to mirror the treatment of the Council's landscape consultant, or with a direct working link, they would have significant concerns.

The link to this document worked in the final draft of the report, however, having checked it is correct that it does not appear to be working on the Agenda Reports pack. Rather than provide another link, which may or may not work, the full response may be found at Appendix 2 to this Supplementary Report as requested by the Applicant. To assist Members further – for ease of reference, the Council's landscape consultant's responses are also included at Appendices 1 and 3. It should be noted that all documents/figures referred to in these responses are available to view on the ECU website. The Applicant notes that this could be dealt with by Supplementary Report but they have concerns about the amount of time Councillors will have to fully digest this information.

5. AVIATION

Whilst the Applicant notes that the Council has stated this objection would be lifted should the aviation objections be removed, they think it's important to note within the reasons for objection themselves that this is a technical matter which will be resolved via the ECU (all parties are confident of resolution) and is essentially a procedural objection from the Council at this stage. This is not clear enough to the Applicant and they are concerned it would give Councillors the wrong impression. The Applicant notes this could be dealt with by Supplementary Report but they have concerns over the timing of this.

The Applicant has today (22nd September) copied Officers into further correspondence sent by them to Glasgow Prestwick Airport, with the aim of resolving their outstanding objection. This should be available to view on the ECU website and does not alter Officers recommendation on this proposal. Officers also note the Applicant's opinion on the structure of Officers reasons for objection. There is a paragraph underneath the reason for objection which makes the Council's position quite clear, Officers do not consider that this requires to be changed. The relevant paragraph is as follows:

“Argyll & Bute Council therefore object to the proposal due to the adverse impact it would have on Aviation. The Energy Consents Unit should please note that in the event that National Air Traffic Services (NATS) and Glasgow Prestwick Airport withdraw their objections, then Argyll & Bute Council would no longer object on these grounds. Should these objections not be removed and the proposal progresses to an Inquiry, Argyll & Bute Council would defer to National Air Traffic Services and Glasgow Prestwick Airport as the Technical Experts on this matter”

6. PLANNING BALANCE

The Applicant has significant concerns that a planning balance against material considerations has not been fully considered and particularly in respect of SPP para 33. This does not give them confidence that Councillors are being presented with the full picture i.e. limited visual effects versus multiple benefits – there is no evidence from the Council to suggest harm demonstrably outweighs benefits. The Applicant says this in the context that they would see this as being in their favour at PLI – however, their aim is to maintain positive relationships with the Council and avoid PLI unless absolutely required. A response from Officers is provided below in respect to these concerns,

Paragraph 33 of SPP

The Applicant considers that the ‘tilted balance’ in favour of sustainable development applies in relation to this proposal, given that the Local Development Plan is greater than 5 years old. Paragraph 33 states:

“Where relevant policies in a development plan are out-of-date or the plan does not contain policies relevant to the proposal, then the presumption in favour of development that contributes to sustainable development will be a significant material consideration. Decision-makers should also take into account any adverse impacts which would significantly and demonstrably outweigh the benefits when assessed against the wider policies in this SPP. The same principle should be applied where a development plan is more than five years old”.

Officers note that para 33 starts “where relevant policies in a development plan are out of date”, however, this is normally applied to policies on housing or industrial land supply, where LDPs make specific allocations to cover specified periods of time. The policy on renewables in LDP1 and its Supplementary Guidance do not relate to a specific period of time, and are consistent with SPP 2014 this being the Scottish Government’s most up to date expression of planning policy, and therefore it is considered that the relevant policies are not out of date.

Additionally, the proposed replacement Local Development Plan 2 is currently at examination, and it is anticipated that the Reporters’ recommendations will be received in the next few months, the Council could therefore be in a position to Adopt LDP2 in the first quarter of 2023. Policy 30 in pLDP2 – The Sustainable Growth of Renewables, is essentially the same as Policy LDP 6 in the Adopted LDP, and while this policy is subject to examination, it is consistent with SPP 2014, and reflective of the emerging policy on renewables in the draft NPF4.

There is close alignment between the policy established by the Council’s Local Development Plan and the expression of government policy in SPP. These policies are underpinned by the over-riding imperative to secure sustainable economic development. The Report of Handling provides an assessment of the proposal against each of the key considerations identified in Policy LDP6 and Para 169 of SPP.

Onshore wind is recognised as being a key component in the aim to increase renewable energy generation. However, where the Applicant has failed to adequately demonstrate that there would be no unacceptable significant adverse effects, whether individual or cumulative, including those on landscape character and visual amenity, the proposal will not benefit from support in terms of the presumption in favour of sustainable development afforded by Policy LDP 6, or SPP.

Paragraph 28 of SPP

The SPP introduced a presumption in favour of development that contributes to sustainable development. Paragraph 28 states:

“The planning system should support economically, environmentally and socially sustainable places by enabling development that balances the costs and benefits of a proposal over the longer term. The aim is to achieve the right development in the right place; it is not to allow development at any cost”.

It is considered by Officers that this proposal is not capable of contributing towards 'sustainable development'. The significant adverse impacts it poses in terms of landscape and visual impact cannot be considered 'sustainable'. It is considered that these adverse effects outweigh any benefits the proposal could bring. Officers therefore submit that there can be no presumption in favour of this development in terms of this paragraph of SPP either. Officers do not consider that the proposed development is located in the right place – a view which is supported by the Council's landscape consultant and also the statutory consultation advice of NatureScot.

In reaching the recommendation to object to this proposal, Officers have had regard to: relevant National and Local Policy and guidance; the EIAR and other supporting documents; the advice of key consultees; and the material consideration raised in the representations. It has been concluded that notwithstanding those factors which weigh positively in the balance of considerations, the significant adverse Landscape and Visual Impact would significantly and demonstrably outweigh the benefits of the development and would therefore be unacceptable. As referred to above *“the aim is to achieve the right development in the right place”*, there is not a policy expectation that an adverse impact on the local environment should be accepted as the price to pay for the ability to satisfy Scotland's energy needs and UK climate change commitments. The natural environment also requires to be seen as a finite resource worthy of protection.

6. LIGHTING EFFECTS

Another point raised by the Applicant is that the bullets above the link on p29 of the Report of Handling should be updated to reflect conversations between the Applicant around Clachaig Glen night time visuals where Councillors should not be comparing two schemes without a detailed technical note or clear view from the Council as which to prefer and why – the Applicant considers that Officers were in verbal agreement not to include this point last week.

In this case, and as the Applicant highlighted in their rebuttal to the advice of the Council's landscape consultant, there is no evidence or justification provided by the Council or the Council's landscape consultant to suggest that they are underplaying effects and unless there is, the Applicant does not think it is reasonable or fair to ask Councillors to make that judgement. The Applicant does not accept a comparison against Clachaig Glen without evidence, and have issue with this being presented in the report.

Verbal agreement between the Applicant and Officers related to the exclusion of the Clachaig Glen night time visualisation from the Councillor Packs. The reason being that the Applicant did not wish to include them for the reasons detailed above. It did not relate to the Report of Handling. It is the expert opinion of the Council's landscape consultant, and it is not considered that this should be disregarded.

7. APPLICANT'S CONCLUSION

In light of the above the Applicant feels that there are a number of items which require some time for both the Council and the Councillors to consider, accordingly they do not have comfort that this will be possible with sufficient time before next week's Planning Committee. Therefore they have respectfully requested that the determination at Committee is delayed until October 2022 to allow these matters to be sufficiently addressed.

8. OVERALL CONCLUSION & RECOMMENDATION

In light of all of the above, Officers recommendation remains the same that the Council should object to this proposal for the reasons detailed in the Report of Handling.

Should Members share the Applicant's concerns that they have not had sufficient time to consider the supporting documents, then they may wish to consider deferring consideration of the proposal until a later date.

Author of Report: Arlene Knox

Date: 22nd September 2022

Reviewing Officer: Sandra Davies

Date: 23rd September 2022

Fergus Murray

Head of Development and Economic Growth

**APPENDIX 1: LANDSCAPE AND VISUAL REVIEW, CAROL ANDERSON LANDSCAPE
ASSOCIATES, REVISED JUNE 2022**

Rowan Wind Farm, Argyll and Bute

Landscape and Visual Review, Carol Anderson Landscape Associates, revised June 2022

Introduction

This review of the landscape and visual effects of the proposal has been undertaken by Argyll and Bute Council's consultant landscape architect and is based on examination of the Environmental Impact Assessment Report (EIA-R) dated December 2021 and a field visit undertaken in March 2022.

This review was originally issued in April 2022 but revised in June 2022 to take account of changes made by the applicant to the visibility aviation lighting strategy.

The proposal

The Rowan Wind Farm proposal comprises 13 turbines, 200m to blade tip and ancillary infrastructure including an energy storage compound. Access to the development would be from the B8024 and 11.88km of new track would be constructed. The description of the proposed development set out in Chapter 3 of the EIA-R dated December 2021 does not address the requirements for visible aviation lighting with the specification for this contained in the LVIA. The applicant issued a revised aviation lighting strategy and assessment in June 2022.

Information provided in Landscape and Visual Impact Assessment (LVIA)

The LVIA has been undertaken in accordance with the Guidelines for Landscape and Visual Impact Assessment, Third Edition. The level of detail provided is appropriate and I agree with the majority of the judgements made with regard to significant landscape and visual effects.

The figures provided to support the LVIA are clear and informative with representative viewpoint location maps, the detailed 10km Zone of Theoretical Visibility (ZTV) map and figures illustrating sequential effects from ferry routes especially useful.

2017 Argyll and Bute Landscape Wind Energy Capacity Study

The proposed wind farm lies within the *Knapdale Upland Forest Moor Mosaic* Landscape Character Type (LCT) 6b identified in the Argyll and Bute Landscape Wind Capacity Study (ABWCS). This LCT covers the Knapdale peninsula between West Loch Tarbert and the southern boundary of the Knapdale National Scenic Area.

The *Knapdale Upland Forest-Moor Mosaic* LCT has an irregular and often complex craggy landform with pronounced ridges and occasional high, more defined summits, although some limited areas of slightly smoother and gentler hill slopes also occur, mainly in the south-west. This LCT has a simple land cover of extensive coniferous forestry and moorland; it is also sparsely populated and already accommodates wind farm development. While the scale and sparsely settled nature of this landscape presents potential opportunities to accommodate large scale wind farm development, areas of more complex smaller scale hills fringing the outer edge of this upland area and the more defined ridges and peaks within its core are sensitive to such development.

There is little settlement in this landscape and it is not notably popular for recreation. Visibility of the interior of these uplands is fairly restricted from roads and settlement within adjacent low-lying coastal areas although there are longer views from the nearby Knapdale NSA, across Loch Fyne, West Loch Tarbert and from Arran and Gigha.

The proposed turbines, which would be up to 200m high to blade tip, would fall within the 'Very Large' typology considered in the ABLWECS. The study concludes that the combined landscape and visual sensitivity of the *Knapdale Upland Forest Moor Mosaic* LCT to this size of turbine would be High.

The ABLWECS sets out key constraints to development in this LCT. I consider that this proposal would be contrary to some of these constraints in respect of its effect on views across West Loch Tarbert from the A83 and cumulative effects with other wind farms, including the operational Freasdail wind farm (and the Airigh wind farm which has been consented since the issue of the ABLWECS in 2017). While this proposal would not be located on the highly sensitive ridge between Stob Odhar and Meall Reamhar which is a scenic feature in views across West Loch Tarbert, it would detract from it in some views from the south-east side of the loch.

The proposed wind farm also lies close to the boundary of the *Rocky Mosaic* LCT. This LCT covers much of the east and west coasts of Kintyre and extends around the shores of West Loch Tarbert. Key constraints identified in the LWECS include the strong contrast which occurs between these intricate settled sea and loch fringes with adjacent simple and more expansive uplands, which makes an important contribution to the rich scenic composition characteristic of Argyll.

Landscape effects

The proposed development lies within the *Kintyre Upland Forest Moor Mosaic* LCT and would have direct significant adverse effects on its character. The LVIA concludes that these effects would occur within approximately 2km of the proposed wind farm due to the extent of visibility of the proposal and I am in agreement with this judgement.

The *Rocky Mosaic* LCT comprises a narrow coastal strip on both the east and west coasts of Kintyre and around the shores of West Loch Tarbert. This is a small-scale, diverse and settled landscape which is highly sensitive to large wind turbines. The proposal would not be located in this LCT but would lie in relatively close proximity and be clearly seen from parts of this LCT, principally affecting the south-eastern coastal fringes of West Loch Tarbert. The LVIA concludes that effects (considered in a baseline which includes the operational Freasdail wind farm) would be significant along the southern coast of West Loch Tarbert. I agree that the effects of this proposal would be significant and adverse on the part of the *Rocky Mosaic* LCT lying on the south-eastern side of West Loch Tarbert.

The LVIA additionally considers effects on the *West Loch Tarbert* Local Coastal Character Area (LCCA), concluding that these would be significant. I am in agreement with this judgement.

Effects on valued landscapes

The proposed development site is not covered by any landscape designations or other recognised landscape interests although a number of national and local landscape designations lie within 20km of the proposal.

There would be limited visibility of the proposal from the *Knapdale* National Scenic Area (NSA) which lies to the north and from the *Kyles of Bute* NSA which lies to the west.

There would also be limited visibility of the proposal from parts of the Area of Panoramic Quality (APQ) covering south-west Knapdale. While a greater degree of theoretical visibility would occur from the APQ covering the west coast of Kintyre in the Tayinloan area, this proposal would be seen in the context of the closer consented Airigh wind farm and at distances of >10km thus reducing impact. There would also be a greater degree of potential visibility of the proposal from the APQ covering the east coast of Loch Fyne and the Ardlamont peninsula area. However, screening of the site by landform reduces the visibility of the full vertical extent of the turbines and this limits intrusion from more open coastal fringes and hills.

In conclusion, I consider that the effects of this proposal on designated landscapes lying within Argyll and Bute would not be significant.

Visual effects

The proposal sits in a shallow basin and benefits from a degree of screening by landform which particularly limits views of the vertical extent of turbines from the east across Loch Fyne, its eastern shores and the Ardlamont peninsula. The screening effect of landform within the site is diminished however to the south-west and this proposal would be widely visible across the West Loch Tarbert area and seen in relatively close proximity to key receptors. LVIA Figure 6.4 is useful in showing the likely extent of visibility within 10km of the proposed development site.

The location of the proposal close to the transition with the more settled coastal fringes of West Loch Tarbert and to key roads, increases the impacts of this proposal when compared with other operational and consented wind farms located on the Kintyre peninsula. This proposal would be particularly prominent in views from the north Kintyre uplands and from the south-eastern shores of West Loch Tarbert. Significant adverse effects on views would occur on the following receptors:

- **The A83 as it is aligned to the south of West Loch Tarbert.** This is an important route for tourists, forming part of Kintyre 66 and National Cycle Network Route 78 (Caledonia Way). EIA-R Viewpoints 2, 10 and 19 demonstrate the significant adverse effects that will occur on scenic views from this route. Similar views will be experienced from settlement including from parts of Whitehouse and its surrounds as well as from dispersed residential properties.
- **The Kennacraig toIslay ferry route** – The ferry route assessment visualisations and maps set out in the LVIA are informative and help confirm that significant adverse effects would occur on views from approximately 2km of the route within West Loch Tarbert. This proposal would be seen sequentially with the operational Freasdale wind farm in views from the waters of West Loch Tarbert.

- **Footpaths in the local area**, including those to Dun Skeig and from the northern section of the Kintyre Way where significant cumulative effects with operational and consented developments will also occur. EIA-R Viewpoints 6 and 11 illustrate these effects.

Night-time lighting effects

Visible aviation lighting is proposed on the nacelles of 6 of the 13 turbines of the proposal. Reduced intensity lighting (where 2000 candela nacelle lighting would reduce to 200 candela during periods of clear visibility) and directional lighting with a focussed horizontal beam of light (limiting lighting intensity seen from lower-lying views) are both embedded features of the lighting scheme.

Night-time visualisations have been produced from 4 representative viewpoints and a lighting assessment is set out in the updated Technical Appendix 6.3. All 4 of these viewpoints are located at low elevations and between 3.7km to 13.6km from the proposal. Table 6.3.4 summarises the number of illuminated turbines that will be seen from each of the 21 representative viewpoints considered in the LVIA. The LVIA lighting assessment concludes that no significant effects would be associated with visible aviation lighting.

Roads and settlement are principally located on lower-lying coastal fringes where the intensity of light would be reduced to between 200-175cd or 20-18cd in clearer conditions which are estimated in the EIA-R to occur for 98% of the time (Figure 6.3.Cb). There are few elevated locations where the lights would be seen at greatest intensity with the Kintyre Way one of the few higher-level viewpoints in this part of Argyll and Bute. The reduced and directional intensity lighting committed to by the applicant would reduce night-time effects although in the absence of comparable visible aviation lighting on operational turbines to visit in the field it is difficult to gauge the accuracy of night-time visualisations and the LVIA lighting assessment¹.

I consider that the lighting assessment may have under-estimated the effects of visible aviation lighting for Viewpoints N2 and N10. I also believe that the night-time visualisations need to be treated with caution as, while they provide some indication of effects, they generally do not replicate the levels of brightness that can be experienced in the field. It is useful to note the differences between the night-time visualisations prepared for this application and the recently submitted Clachaig Glen wind farm application. Both applications feature similar lighting specifications with directional intensity mitigation accounted for in the generation of the night-time visualisations. However, while viewpoint N2 (Rowan EIA-R) and viewpoint 8 (Clachaig Glen EIA-R) lie at similar elevations, the Rowan visualisations depict a much more subdued lighting scheme. This is surprising especially given the increased distance of viewpoint 8 from the Clachaig Glen proposal (8.94km as opposed to 3.7km).

I consider that the night-time lighting would increase the duration of adverse effects and that these effects may be significant from the waters and south-eastern shores of West Loch Tarbert where lit turbines would introduce new sources of lighting into a relatively dark environment.

¹ It is my understanding that there are currently no operational wind turbines which feature reduced and directional intensity of lighting mitigation. Review of the visible aviation lighting assessments undertaken for a range of recent wind farm proposals reveals a divergence in lighting specification, night-time visualisations and judgements made on the likely significance of effects.

Cumulative landscape and visual effects

Significant cumulative landscape and visual effects would occur where this proposal would be seen together and sequentially with the operational Freasdail wind farm and the consented Airigh wind farm in views from the Kennacraig to Islay ferry and from the A83 in the West Loch Tarbert area.

The addition of this proposal to a scenario which includes the Freasdail, Airigh and the application-stage Sheirdrim wind farm would also incur significant adverse cumulative effects from the Kennacraig to Islay ferry and on views from the A83, settlement and from footpaths on the south-eastern coastal fringes of West Loch Tarbert and the north Kintyre uplands. The effect of this scenario would be one where wind turbines would form a key defining feature of the West Loch Tarbert landscape, significantly detracting from the scenic qualities of the loch and its diverse shores.

This proposal would also be seen in combination and sequentially with the operational Srondoire and Allt Dearg wind farms and the application-stage Earraghail wind farm from parts of Loch Fyne and its eastern shores. Screening by landform generally restricts the extent of visibility of the Rowan turbines in views from the east and this, together with the wide spacing between developments and intermittent screening by roadside vegetation, would limit cumulative effects from the B8000 north of Portavadie. Significant landscape and visual cumulative effects would not occur from Portavadie and the Ardlamont Peninsula.

This proposal will contribute to significant sequential effects on views from the Kintyre Way but would generally have a lesser effect than operational and consented wind farms, and the application-stage Narachan and Earraghail wind farms, which are sited closer to this long-distance route.

The application-stage Narachan wind farm, which also features visible aviation lighting, would be principally seen together in more distant views from parts of north Arran, Gigha and the largely unsettled Kintyre uplands. In terms of cumulative night-time effects, this proposal would have a lesser and minimal effect when seen together with the Narachan wind farm in views from these locations due to its greater distance.²

Conclusions

The proposed development site lies within the *Knapdale Upland Forest Moor Mosaic* LCT which covers much of the Knapdale area between West Loch Tarbert and the southern edge of the Knapdale National Scenic Area. This landscape has a simpler landform in the south-west but is complex and craggy in the north-east. The operational Allt Dearg and Srondoire wind farms occupy a prominent location in the LCT. The consented Airigh wind farm, while comprising larger turbines, is associated with the more subdued terrain occurring in the south-west of this LCT.

This proposal, which comprises very large turbines of up to 200m, would be sited in a basin which reduces its prominence and intrusion seen from Loch Fyne and from the settled eastern

² The Earraghail wind farm applicant is committing to an Aircraft Detection Lighting System (ADLS) and, as this would significantly reduce the duration of night-time lighting, this scheme is therefore considered unlikely to contribute to significant cumulative lighting effects

coastal fringes of this loch. The containment provided by landform is diminished in views from the south around West Loch Tarbert however where turbines would be visible in closer proximity and where their scale would be more appreciated due to greater visual exposure and because they would be seen in close conjunction with the smaller scale settled loch fringes.

Visibility from the northern shores of West Loch Tarbert will be minimal and while this proposal would be visible from parts of Gigha, the Ardpatrik Point area and from the west Kintyre coast, it would not have a significant effect due to the greater distances involved and also because of the presence of the consented Airigh wind farm which is more prominent in some of these views. The greatest degree of visibility (and intrusion) would occur from the waters of West Loch Tarbert, from its south-eastern coastal fringes and from parts of the northern Kintyre uplands.

Significant adverse effects would occur on the following landscape/seascape character areas:

- The *Knapdale Upland Forest Moor Mosaic* LCT extending approximately 2km from the proposed wind farm site
- The *Rocky Mosaic* LCT where it covers the south-eastern shores of West Loch Tarbert
- The West Loch Tarbert Local Coastal Character Area.

The significant adverse visual effects associated with the proposal would principally affect views in the West Loch Tarbert area as follows:

- The A83 where it is aligned on the south-eastern coastal fringe of West Loch Tarbert. This road is an important tourist route forming part of National Cycle Network 78 and the Kintyre 66.
- The Kennacraig to Islay ferry route within inner West Loch Tarbert
- Footpaths in the Dun Skeig area and from a section of the Kintyre Way.

In the above views, this proposal would be seen simultaneously or sequentially with the operational Freasdail and consented Airigh wind farms.

This proposal would be one of the first wind farm proposal to introduce lighting to the dark skies of Kintyre and while the intensity of lights will reduce when seen from lower elevation coastal fringes, I consider that they would still be clearly seen from these more settled and frequented areas and that they may extend the duration of significant adverse effects on views from the West Loch Tarbert area. The potential cumulative effects of visible aviation lighting on character and views are a concern given the number of recent applications for turbines >150m in Argyll and Bute requiring such lighting although it should be noted that the recent Earraghail wind farm application is committed to the adoption of an Aircraft Detection Lighting Strategy (ADLS) which would substantially reduce the duration of night-time lighting.

Cumulative landscape and visual effects with the application-stage Sheirdrim wind farm are a key concern. If the Sheirdrim proposal is consented on appeal I consider that the addition of this proposal would result in a major adverse combined cumulative effect on the West Loch Tarbert area significantly affecting its character and views from the A83, settlement, footpaths and the Islay ferry.

It is recommended that this proposal should be objected to on landscape and visual grounds principally because of its prominent location in relation to West Loch Tarbert and its sensitive

coastal fringes, including impacts on views from key transport routes which are important for visitors.

Key visualisations for the Committee to see include:

- Figure 6.4 Detailed ZTV 10km
- Figure 6.9 ZTV with Landscape Planning Designations
- Viewpoint 9 Portavadie (note that fewer turbine hubs would be visible when compared with the Earraghail wind farm proposal)
- Viewpoint 12 Kilfinan (demonstrates the siting of the wind farm in a dip provides greater screening of turbine bases in views from the east)
- Viewpoint 10: A83 near Gartnagrenach (a scenic view across West Loch Tarbert)
- Viewpoint 19: A83 Whitehouse (effects on views to the high ridge on Knapdale)
- Viewpoint 11: Dun Skeig
- Clachaig Glen EIA-R – Viewpoint 8 Night-time visualisation Figure 8.5 and Viewpoint N2 in the Rowan EIA-R (to enable comparison between night-time visualisations)

APPENDIX 2: RESPONSE TO COUNCIL'S LANDSCAPE OPINION



Rowan Wind Farm

Response to Council's Landscape Opinion

May 2022

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1 INTRODUCTION

Background

- 1.1 This document has been prepared in response to the consultation response to Rowan Wind Farm (the proposed development) by Carol Anderson Landscape Associates, dated April 2022 (the landscape and visual opinion). The landscape and visual opinion forms a recommendation to Argyll and Bute Council (the Council) to object to the proposed development on the grounds of significant adverse landscape and visual effects.
- 1.2 The purpose of the note is to provide contextual information and assessment in relation to the landscape and visual opinion and is for the purpose of the Council's planning department and its Planning Committee to consider when arriving at a recommendation on the proposed development at the relevant Planning, Protective Services and Licencing Committee.
- 1.3 It has been prepared by Energiekontor UK Ltd (the Applicant) and should not be read as part of the EIA Report, although it refers to sections of the EIA Report. Reference should also be made to the Planning Statement (December 2021) which accompanied the application.
- 1.4 It is noted that should the Council conclude that the landscape and visual opinion carries the view of the Council as a whole and opts to object to the proposed development, a Public Local Inquiry would automatically be triggered.
- 1.5 This document is structured loosely on the same terms as the landscape and visual opinion for ease of reference. Material is referred to within the EIA Report (December 2021) as appropriate.

2 RESPONSE TO THE LANDSCAPE AND VISUAL OPINION

Introduction

- 2.1 It is noted that the Council's landscape advisor finds that the EIA Report is appropriately detailed and useful. She finds herself also *"in agreement with the majority of the judgements made with regard to significant landscape and visual effects"*.
- 2.2 The two key matters considered under this document are:
- areas where the Council's landscape advisor is not in agreement with the LVIA; and
 - when significant effects are noted to what extent the Council's planning department see these as unacceptable significant adverse effects.
- 2.3 By their intrinsic nature, all wind energy development will be seen from somewhere, and the cautious worst-case nature of EIA requires that the valency of such effects is always adverse. The matter for the Council is therefore to what extent are the identified effects within the EIA and the landscape and visual opinion unacceptable, in the context of Policy LDP 6 of the adopted Local Development Plan 2015.
- 2.4 This section aims to establish both points above via mirroring the sections used within the landscape and visual opinion, and to maintain that the conclusions reached by the Council's landscape advisor are not sufficient to justify an outcome that these significant effects are unacceptable.

Landscape Effects

- 2.5 As stated within Chapter 6 of the EIA Report (and summarised within Table 6.18 of that chapter), and as also agreed within the landscape and visual opinion, there would be direct landscape character effects upon the Kintyre Upland Forest Moor Mosaic LCT within 2km. This is smaller than the distance of any turbine to any property, and essentially effects the site and its immediate surroundings. Effects like this are intrinsic to wind energy development, and therefore are highly unlikely to be deemed unacceptable at a distance of up to 2km (as per paragraphs 6.181 and 6.182 of the EIA Report). The Council's landscape advisor and Applicant are in agreement that there would be no significant effects on designated landscapes.
- 2.6 The Rocky Mosaic LCT, which comprises a narrow coastal strip around the east and west shores of Kintyre and the shores of West Loch Tarbert, is a nearby LCT and one where the Council's landscape advisor notes in her conclusion that there are effects that are sufficient to merit an objection. These are restricted to the south-eastern side of West Loch Tarbert.

- 2.7 The Applicant's EIA Report, within Table 6.18, summarises that individually and as a standalone (indirect) effect, the proposed development would not have a significant effect upon the Rocky Mosaic LCT south of West Loch Tarbert. Table 6.9 provides a detailed account of predicted effects. The nearest turbine is 3.1km from this LCT.
- 2.8 Individually, the proposed development is not predicted to have a significant adverse effect on the landscape character of the Rocky Mosaic LCT south of West Loch Tarbert (referred to within the EIA Report as Unit B). The assessment within Table 6.9 states that "the proposed development would have a limiting characterising influence on the LCT overall due to the intermittent visibility and fragmented ZTV". This fragmentation of visibility is an important factor that will be referred to later within this response, and one which has been downplayed within the landscape and visual opinion.
- 2.9 Considering the LCT overall, there are deemed to be no individual significant adverse effects on the Rocky Mosaic LCT. This does not appear to be in question by the Council's landscape advisor.
- 2.10 Based on where the viewer is positioned, there may be significant cumulative effects upon the landscape character of the Rocky Mosaic LCT Unit B when combined with the operational Freasdail Wind Farm, and the 'at Inquiry' Sheirdrim Wind Farm (at the time of writing, Sheirdrim had not been determined). However, the Council's landscape advisor has not recognised within the landscape and visual opinion that there is a spectrum of effects down to no effect.
- 2.11 Additionally, the assessment within Table 6.9 of cumulative effects upon the Rocky Mosaic LCT deems that there would be significant effects in combination with Freasdail Wind Farm, but these significant effects would be localised to where Freasdail is within 2km of the transitional boundaries between LCTs. The LVIA concludes that these cumulative effects are due to Freasdail and not the proposed development.
- 2.12 It is therefore not accepted that there are grounds for landscape objection on unacceptable significant adverse effects upon the Rocky Mosaic LCT given a) the proposed development does not have an individual significant effect upon the entirety of the LCT, b) the proposed development does not have a significant adverse effect individually on Unit B of the LCT, and c) the noted significant adverse effects cumulatively are situated in a localised area close to Freasdail, and are largely associated with Freasdail and the transition between LCTs.
- 2.13 This evidence has been presented within Chapter 6: Landscape and Visual. It is not evident that the Council's landscape advisor has considered these points, and, in any instance, the Applicant would find it difficult to accept that given points a) to c) above, there would be grounds to maintain that landscape effects on the adjacent LCT are unacceptable.
- 2.14 Significant effects are also noted upon the West Loch Tarbert Coastal Character Area, a regional subdivision of National Coastal Character Types. Indirect effects upon this are described and assessed within Table 6.10 of Chapter 6: Landscape and Visual within the EIA Report. These effects are described individually and cumulatively.

- 2.15 Individually, the assessment notes that the proposed development would be visible in views from the southern area of the coastline at distances of between 2.8km and 13km. This view would mostly comprise hubs and blades, with the towers generally screened by intervening landform and trees. The proposed development would generally appear in an elevated location, set back from the coast.
- 2.16 In areas where views are more open towards the proposed development, in West Loch Tarbert between Kennacraig and Corranbuie (approximately 2.5 – 3km), there is deemed to be a significant effect upon the Coastal Character Area. Despite this, the LVIA states that the proposed development would not alter the key characteristics of the overall coastal character area. There would be no significant effects via aviation lighting. It is also notable that the magnitude of impact is deemed to be medium to low and not assessed as being high, which would be the suggested outcome from an unacceptable significant effect. The Applicant would therefore put forward that this limited significant effect on coastal character is localised in nature and overall, does not give rise to an unacceptable significant adverse effect on the coastal character area.

Argyll and Bute Council Landscape Wind Energy Capacity Study (LWECS)

- 2.17 The proposed development is situated within the Knapdale Upland Forest Moor Mosaic Landscape Character Type (LCT 6b).
- 2.18 The “irregular and often complex craggy landform” gives scope to use the landform to assist in the design process. As outlined within Chapter 6: Landscape and Visual, Chapter 4: Design Evolution of the EIA Report as well as the Design and Access Statement, the Applicant sought to use this landform to obscure significant effects from all directions apart from the south, which was not possible given the topography. This has been achieved.
- 2.19 The design of the proposed development then crucially focused on views from the south to achieve consistent spacing (within the parameters of ground-based constraints), and provided a layout that is consistently spaced, mostly back-clothed by the landform, and does not appear as a dominant or incongruous feature within the landscape. This is apparent via Viewpoints 10, 11 and 19 where the wind farm is accommodated into the hillside and does not encroach towards West Loch Tarbert.
- 2.20 The Applicant would point towards the detailed assessment of the proposed development against the aims and contents of the LWECS relevant to the LCT. This is contained within Chapter 6: Landscape and Visual of the EIA Report, at Table 6.7. It is not clear if the Council’s landscape advisor has considered this assessment.
- 2.21 It would appear from the conclusions in the landscape and visual opinion, it is accepted that the proposed development is set back into a basin or bowl, and that topography and design have minimised effects on Loch Fyne and its eastern coastal fringes, and all other areas except West Loch Tarbert and in particular, its south-eastern shore.
- 2.22 The Council’s landscape officer also states within the LWECS section of the response, that “I consider that this proposal would be contrary to some of these constraints in respect of its effect on views across West Loch Tarbert from the A83 and cumulative effects with other

wind farms (...including Freasdail and Airidh). While this proposal would not be located on the highly sensitive ridge between Stob Odhar and Meall Reamhar which is a scenic feature in views across West Loch Tarbert, it would detract from it in some views from the south-east of the loch".

- 2.23 The Applicant's response to this point is contained within Table 6.7 of the EA Report. The turbines are placed well below the Stob Odhar and Meall Reamhar ridgeline, which provide back-clothing and screening. In the views across West Loch Tarbert, the lower parts of the turbines would be screened and the hubs do not for the most part break the skyline, which gives capacity to downplay and envelop the 'true height' of the turbines.
- 2.24 Therefore, the proposed development is not in conflict with impacting these ridges as they appear above and behind the development. It is clear that the Council's landscape officer does not suggest that the proposed development is necessarily in conflict with this part of the LWECS, instead that it may "detract from it in some views". It is not stated how and why the proposed development detracts from this particular ridgeline "in some views".
- 2.25 In terms of this particular constraint within the LWECS, it should be agreed that the proposed development does not contradict the guidance around this ridgeline.
- 2.26 The LWECS identifies a constraint in "the more complex landform of smaller interlocking hills which provide a backdrop to the settled coastal landscapes of the Rocky Mosaic (LCT20)....and which are prominent in views from roads and settlement". The proposed development is set back from the coast in an upland forested area above the settled coastal landscapes cited.
- 2.27 It is this complex interlocking landform that enables full or partial screening on three sides of the proposed development, providing a degree of screening that is difficult to find when looking to accommodate development of the size and scale necessary for modern wind farm development. This should be seen as a positive feature of siting.
- 2.28 The degree of prominence is a matter for professional judgement and it is a question for the decision maker to deem whether or not the proposed development is a prominent feature of the landscape such as that it causes unacceptable significant adverse effects (in line with Policy LDP6 of the adopted Argyll and Bute Local Development Plan 2015). It is the view of the Applicant that cognisant of the more open aspect to the south, the wind farm has been well designed into the receiving landscape.
- 2.29 Further detail on the fit of the proposed development with the LWECS is contained within Tables 6.7 and 6.8 of the EIA Report.
- 2.30 It is noted that in the conclusion of the Council's landscape advisor, the deemed degree of compliance with the LWECS is not cited as a reason for objection. This is consistent with the Council's shift towards accommodating larger turbines (>150m) in the landscapes of Argyll and Bute, as recently evidenced within the Report to Committee for Narachan Wind Farm.

Visual Effects

- 2.31 Visual effects are by their nature subjective and are open to differing professional opinion. It is noted within the landscape and visual opinion that the Council's landscape advisor is content that the proposed development has used the topography to provide mitigation in views from Loch Fyne, its eastern shores, and the Ardlamont peninsula.
- 2.32 The area subject to objection is again the south-eastern shore of West Loch Tarbert and associated views across the loch. The first paragraph of the 'visual effects' section of the landscape and visual opinion states that *"the screening effect of landform within the site is diminished however to the south-west"*. It is agreed that the landform opens out in this direction. However, as demonstrated within the landscape section above, depending on the position of the viewer there is a degree of screening for turbine towers – the turbines are not fully visible from this part of West Loch Tarbert.
- 2.33 It is stated within the landscape and visual opinion that *"this proposal would be particularly prominent in views from the north Kintyre uplands and from the south-eastern shores of West Loch Tarbert"*. It is again worth noting that the EIA Report assesses significant visual effects from viewpoints associated with the south-eastern shores of West Loch Tarbert – Viewpoints 2, 5, 10, 19 and 21 are demonstrative of the effects. However, as set out within Technical Appendix 6.2 of the EIA Report, there is no viewpoint which would receive a 'high' magnitude of impact which is unusual for a wind farm of this size. The Applicant notes that this does not appear to be disputed. This is demonstrative of the careful design and distance to receptors, which in the case of the viewpoints noted above range from 3.7km to 10km.
- 2.34 It is noted that the landscape and visual opinion does not object based on views from any representative viewpoint. It should be noted that viewpoint locations are typically agreed in positions of greatest visibility and are 'worst case' as agreed with the Council and NatureScot.
- 2.35 The main points of objection are based upon effects upon three visual receptors: the A83/Kintyre 66/NCN 78 as aligned to the south of West Loch Tarbert, the Kennacraig to Islay ferry route, and footpaths in the local area, including those around Dun Skeig and the northern section of the Kintyre Way. Taking each point in turn, the Applicant would wish to provide comment on each.
- 2.36 The A83 extends from Tarbet on the shores of Loch Lomond, to Campbeltown, and is 158.2km long. It performs a major practical function in the daily lives and connectivity of Argyll and Bute residents and visitors given it is the primary route to and from Kintyre to the rest of Scotland. There are several commercial uses along its stretch, including (but not dominated by) wind farms.
- 2.37 A sequential route assessment the A83 was provided within the EIA Report. Figure 6.17a provides a bare earth ZTV of where the proposed development may be visible in the absence of vegetation, which stretches from north of Glenbar in the south, to Stonefield Castle in the north of the section. The corresponding assessment is set out within Table 6.14 of the EIA Report and describes effects travelling from south to north. An update to Figure 6.17a is appended to this response which indicates the extent of the A83 where there

would be visibility, but also including vegetation and forestry. This aims to supplement a realistic assessment of the extent of visibility.

- 2.38 From Glenbarr to Ronachan, effects are negligible or zero due to vegetation screening. A 2.5 – 3km stretch from Gartnagrenach to Grassfield Gate (south-west of Whitehouse) provides open views and significant effects. The A83 at Whitehouse would not experience visibility of the proposed development due to vegetation. There is limited visibility until north of Corranbuie (VP2) where there is an opening in roadside vegetation for around 50 to 60m where significant effects are identified. Table 6.14 of the EIA Report demonstrates that there is no further visibility between the Corranbuie opening and the end of the assessed stretch near Stonefield Castle, again due to vegetation.
- 2.39 Therefore, Table 6.14 concludes that significant visual effects upon the A83/Kintyre 66/NCN 78 are limited to short, intermittent sections, affecting 2.5 – 3km of the 158km A83 route (1.8%) and 6.9% of the 43km section considered within the sequential assessment. These are only experienced by travellers heading north (generally the opposite direction from the majority of tourist visitors experiencing the area for the first time).
- 2.40 Between the key area of Gartnagrenach to Corranbuie, a stretch of around 10km, it is anticipated that significant visual effects would occur for a combined 2 to 3 minutes of a 10-minute driving time (assuming a speed of 60mph). Views within this time would be interspersed by vegetation and would not be continuous.
- 2.41 It is noted that the Gartnagrenach lay-by has been cited as serving an important touristic function. Whilst this offers clear, open and pleasant views over West Loch Tarbert, the lay-by itself is not signposted and has no infrastructure which encourages travellers to stop, for example picnic tables, benches, bins or interpretative boards (unlike other potential stopping areas on the A83, such as around the Rest and be Thankful further north).
- 2.42 Whilst significant visual effects are noted on the A83 and road users for this intermittent, limited stretch in one direction only, with views at a distance of approximately 3.7km to 10km for a couple of minutes cumulative driving time, the Applicant would maintain that this does not amount to an unacceptable significant adverse effect (as per the requirement of the Local Development Plan) given the limited nature of effects. The general design of the proposed development from this location offers good lateral spread, consistent spacing, and is situated in a bowl above the coastal fringes.
- 2.43 The Council's landscape advisor sets out in the second primary visual reason for objection, that the Kennacraig to Islay ferry route experiences significant adverse visual effects on approximately 2km of the route within West Loch Tarbert. In addition, it is noted that the proposed development would be seen sequentially with the operational Freasdail Wind Farm.
- 2.44 The EIA Report addresses the Kennacraig to Islay route in several places, including assessing views from the Kennacraig terminal as part of the Viewpoint assessment within Technical Appendix 6.2 (along with Figure 6.25 and associated assessment, which judges that the effects from Kennacraig Terminal are not significant), and offering a sequential route assessment within Figure 6.18.

- 2.45 Table 6.19 of the EIA Report concludes that there are significant effects across 1km of the route within West Loch Tarbert. This 1km relates to the initial section approaching Kennacraig. It is noted that the magnitude of impact here is medium rather than high. Elsewhere, it reduces to zero. Table 6.15 offers further detail and illustrates, with the aid of Figure 6.18, that significant effects are experienced on the approach to Kennacraig Ferry Terminal affecting approximately 17 degrees of the field of vision. Towers would either be screened by landform or back-clothed by more distant hills. The turbines would appear as a coherent and cohesive group for this 1km. The area of significant effect represents 2.5% of the overall ferry route at a distance of approximately 6.5km or more.
- 2.46 In terms of the cumulative interaction with Freasdale and Airigh, the EIA Report assesses a briefly experienced significant cumulative effect for the same area as individual effects would occur.
- 2.47 It is noted that the Council's landscape advisor quotes a 2km distance for significant adverse effects on the ferry route. It is not clear how this has been derived as it is not consistent with the findings of the EIA Report. This may seem a small discrepancy but relates to a conflated doubling of effects.
- 2.48 In any event, the nature of the ferry route is transitory. Whilst there is a high degree of sensitivity for tourists, the magnitude of impact is not high. The view from Kennacraig Terminal itself is not deemed significant, and there is no suggestion otherwise from the Council's landscape advisor. The perceived issue therefore, is with 1km of ferry route, predominately experienced in one direction (i.e. Islay to Kennacraig).
- 2.49 Whilst the EIA Report must report a significant effect on a small part of the route, this does not comprise an overall significant adverse effect on the entirety of it, and indeed represents 2.5% of the route.
- 2.50 It is therefore difficult in the Applicant's view to establish that this limited significant effect on a transitory route would constitute an unacceptable significant adverse effect.
- 2.51 The Council's landscape advisor also assigns a similar level of effect to settlement including parts of Whitehouse and dispersed residential properties. It is important to note that from within Whitehouse, the settlement itself has minimal to no view of the proposed development. Significant visual effects were noted on a limited number of dispersed properties to the south-west of Whitehouse, where the proposed development would occupy 14 degrees of the view, and with bases and most of the tower height screened by topography, at a distance of around 8-9km.
- 2.52 The final visual impact mentioned within the landscape and visual opinion is that of paths around Dun Skeig. Dun Skeig is situated approximately 13.5km to the south-west of the proposed development.
- 2.53 It is important to note that whilst effects upon Dun Skeig have been a key contested point for some wind farms in Kintyre and Knapdale, no significant effect is found in cultural heritage terms and Historic Environment Scotland have no objection to make in relation to the proposed development. Any perception of a significant adverse effect is therefore

limited to discussion of views as intrinsic views in isolation as opposed to views relevant for their cultural heritage association.

- 2.54 The landscape and visual opinion states "footpaths in the Dun Skeig area". It is not clarified what is meant by this, but it is assumed that significant effects stated refers to Core Paths C461 and C102a, is identified within paragraph 6.62 of the EIA Report.
- 2.55 Table 6.16 of the EIA Report discusses a 'group of Core Paths and Heritage Paths around Dun Skeig Fort'. This highlights that there are several Core Paths surrounding Dun Skeig that have potential visibility of the proposed development. Theoretical visibility is possible from the northern and eastern parts of C102(a) and C102(c) and the elevated C461 to the Hill Fort. The EIA Report notes that otherwise, the paths in this area mostly have no or intermittent visibility. Figures 1 and 2 appended should be referred to to provide further context.
- 2.56 The EIA Report states that "the greatest views of the proposed development would be from the elevated C461 route as it accesses up to the hill fort, and the central section of C102a where it meets the C461". In these views, the proposed development would be visible from the hub upward, representing 10 degrees of the view (i.e. 2.7% of the possible 360 degree view) at a distance of around 12-13km.
- 2.57 The turbines would be partially back-clothed, and would appear as a cohesive group, well-spaced within a shallow bowl.
- 2.58 Conservatively, individual significant effects were identified for these sections of the paths. It is also mentioned within the landscape and visual opinion that Freasdale and Airidh would be experienced with these views. The EIA Report assesses that additional effects of the proposed development alongside Airidh and High Constellation would be significant, however it is noted that these consented wind farms are much closer to the paths than the proposed development (7-8 km to 12-13km). Should Sheirdrim be consented, this would add to the significant cumulative effects, however it is noted that effects from Dun Skeig were a major part of this Inquiry. It is suggested that the addition of the proposed development would not add unacceptably significant additional effects given the proximity of other wind farms. The influence of Rowan Wind Farm would not unacceptably tip this balance given its distance.
- 2.59 Overall, it is found within the EIA Report that whilst there are partial significant visual effects upon the noted receptors (paths around Dun Skeig, the Kennacraig to Islay ferry, and the A83), the Council's landscape advisor does not register that these effects are intermittent and does not discuss the spatial or temporal limits of these effects, except where suggesting the extent of effects on the ferry route are double those found within the EIA Report without providing evidence for that conclusion.
- 2.60 The spatial and temporal limitations of the significant effects, alongside the coherent and sympathetic design of the proposed development, must be given particular weight in assessing whether these significant visual effects are unacceptable. The Applicant would suggest that based on the evidence, they are not.

Night-time lighting effects

- 2.61 Since the publication of the landscape and visual opinion, the Applicant has secured a further reduction of aviation lighting with the Civil Aviation Authority, from 9 of 13 lights to 6 of 13. This is contained within a separate submission to the Energy Consents Unit.
- 2.62 The landscape and visual opinion recognises that the aviation lighting assessment (for 9 lights) does not identify significant effects associated with aviation lighting. The Council's landscape and visual advisor states that she believes the *"lighting assessment may have under-estimated the effects of visible aviation lighting for viewpoints N2 and N10"*. Location N2 is equivalent to Viewpoint 2 (A83 north of Corranbuie) and location N10 is equivalent to Viewpoint 10 (A83 near Gartnagrenach).
- 2.63 It is not stated why the Council's landscape advisor reaches this conclusion and no evidence is provided to back it up. The effects of visible aviation lighting at these locations are clearly demonstrated within Technical Appendix 6.3, where at N2 there would be 4 of 13 lights visible at 5.7km with a maximum candela rating when at 100% luminescence (2% of the time) at 194 candela (T5) (conversely, 19 candela 98% of the time). At N10 there would be 5 of 13 lights visible at a distance of 10-11km, with a maximum candela luminescence of 822 candela 2% of the time, and 82 candela 98% of the time (T13).
- 2.64 This clearly suggests, and the visualisations demonstrate, that aviation lighting would not be significant at full luminescence, let alone the 98% of the year when they will be at 10% brightness. There are therefore no grounds for the comments provided by the Council's landscape and visual advisor.
- 2.65 It is also stated *"the night-time visualisations need to be treated with caution as...they generally do not replicate the levels of brightness that can be experienced in the field"*. The Council's landscape advisor again provides no evidence or explanation for this.
- 2.66 The landscape and visual opinion goes on to state that *"night time lighting would increase the duration of adverse effects and there effects may be significant from the waters and south-eastern shores of West Loch Tarbert where lit turbines would introduce new sources of lighting into a relatively dark environment"*. Again, as detailed above, the night-time effects on West Loch Tarbert are found to be not significant. The Council's landscape advisor provides no evidence to the contrary and this should be given no weight in the determination of the proposed development.
- 2.67 In conclusion to aviation lighting matters, there is no evidence provided within the landscape and visual opinion that should persuade the Council to disagree with the detailed assessment provided within the EIA Report.

3 CONCLUSION

- 3.1 The above sections discuss the issues with the landscape and visual opinion as provided. As the Council are aware, the recommendation to its Planning, Protective Services and Licencing Committee as to whether to object or not objection to the proposed development and grant Section 36 consent and deemed planning consent, is based upon the principles of Section 25 of the Town and Country Planning (Scotland) Act 1997 (as amended). This requires that a decision is made in accordance with the Development Plan unless material considerations suggest otherwise.
- 3.2 The primary instrument of the Development Plan in this regard is Policy LDP6 of the adopted Argyll and Bute Local Development Plan. This gives clear guidance that *"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"*, including upon landscape character and visual amenity.
- 3.3 The first test is therefore whether the Council find the following significant effects unacceptable:
- Landscape effects upon the host LCT (Knapdale Upland Forest Moor Mosaic) for around 2km which comprises the site level and is intrinsic to wind farm development;
 - Landscape effects upon Unit B (south-eastern shores) of West Loch Tarbert as part of the Rocky Mosaic LCT, where a significant effect is only found cumulatively with Freasdail Wind Farm where Freasdail is within 2km of the transitional boundary of the LCT, and the significant localised LCT effect is due to Freasdail, not the proposed development. Effects from the proposed development only, are not found to be significant.
 - Landscape effects on coastal character of the West Loch Tarbert Coastal Character Area where the proposed development is set in an elevated position, back from the coast, for approximately 2.5km and from where the magnitude of impact is not assessed as high
 - Visual effects upon intermittent sections of the A83/Kintyre 66/NCN 78 comprising 1.8% of the A83 travelling northward only, and under 7% of the assessment area for sequential assessment.
 - Visual effects related to 1km of the Kennacraig to Islay ferry, where there are already semi-industrial features associated with a port setting; and
 - Visual effects experienced on two core paths near Dun Skeig occupying 2.7% of a 360 degree view at a distance of 12-13km.
- 3.4 The Applicant concludes that whilst significant effects have to be identified within the EIA Report, the Council's landscape advisor fails to identify or acknowledge the limited or intermittent extent of these. They are therefore not unacceptable on their own accord and the proposed development complies with Policy LDP6.

- 3.5 Should the Council disagree and deem them unacceptable, and therefore deem that the proposed development does not comply with Policy LDP6, material considerations would then apply. The second test would therefore be, do these localised, intermittent significant adverse effects outweigh the following:
- The site is a Group 3 area as per Scottish Planning Policy (2014). This suggests that wind farms may be supported subject to site-specific assessment;
 - The site provides 85.8MW of renewable clean energy generation, assisting towards climate change targets enshrined in law and clear Scottish Government and Argyll and Bute priorities in dealing with the climate emergency;
 - Providing a clear contribution towards the Scottish Government's requirement to provide an additional 8 to 12GW of deployed onshore renewable energy by 2030;
 - Opportunities for peat restoration on site;
 - Opportunities for ornithological enhancement on site;
 - Opportunities to provide recreational and educational public access to the site;
 - Local benefits acquired via new road upgrades and passing places;
 - Provision of a nearby available grid resource; and
 - Induced positive socio-economic effects associated with a community benefit package and local benefits via construction services.
- 3.6 It is also noted that the tilted balance in favour of sustainable development applies in relation to this site, given the Development Plan is greater than 5 years old. This is set out within paragraph 33 of SPP. Should the Council decide that the limited significant effects are unacceptable, it must then provide evidence that significantly and demonstrably outweighs the benefit.
- 3.7 In any case, this document explains significant adverse effects where they occur, further demonstrates the steps taken to reduce them via design, to an application where adverse significant landscape and visual effects are at distance, intermittent or where effects are unavoidable, the wind farm is designed coherently.
- 3.8 The landscape and visual opinion does not provide clarification on the extent of significant effects, nor on their magnitude, and in the opinion of the Applicant, conflates their importance and status within the planning balance that must apply.
- 3.9 In addition, although it is not provided as a reason for objection, no evidence is applied or provided for the landscape advisor's opinions on aviation lighting and accordingly these cannot be given significant weight.
- 3.10 Significant landscape and visual effects should therefore be viewed as acceptable and part of the development process. Conversely In the event that these limited and intermittent significant effects are found unacceptable, a planning balance in line with the tilted balance approach within SPP must be made. Under this scenario, the Applicant finds that there are not sufficient grounds for a recommendation for objection.

APPENDIX 3: COMMENTS ON APPLICANT'S RESPONSE TO THE LANDSCAPE AND VISUAL REVIEW UNDERTAKEN BY THE COUNCIL'S LANDSCAPE CONSULTANT, JUNE 2022

Rowan wind farm proposal

Comments on Applicant's response to the landscape and visual review (LV Review) undertaken by the Council's landscape consultant

June 2022

The Landscape and Visual Review (LV Review) focusses on identifying the principal landscape and visual effects of the proposal. It was undertaken on the basis of field assessment and its conclusions were informed by comparison of the landscape and visual effects of similar wind farm proposals across Argyll and Bute and other parts of Scotland. The LV Review does not provide a detailed Landscape and Visual Impact Assessment as an alternative to that included in the Environmental Impact Assessment Report (EIA-R) for the Rowan wind farm proposal. This would not be possible or appropriate given limited resources and time constraints. It provides an overview of the key landscape and visual effects of the proposal on Argyll and Bute and is one of many other sources of information which will be considered by Argyll and Bute Council when determining the acceptability of the proposal in terms of the planning balance.

Many of the points raised in the applicant's response can be attributed to differences in professional opinion and are therefore not argued further here. There are three matters addressed in the Applicant's response which merit further comment and clarification as follows:

- **Effects on the Rocky Mosaic Landscape Character Type**

The LV Review states that *'The LVIA concludes that effects (considered in a baseline which includes the operational Freasdail wind farm) would be significant along the southern coast of West Loch Tarbert. I agree that the effects of this proposal would be significant and adverse on the part of the Rocky Mosaic LCT lying on the south-eastern side of West Loch Tarbert'*. While it is accepted that the LVIA does not judge the effects of the proposal on this LCT to be significant, either 'individually' or cumulatively with the operational Freasdail wind farm, it is the view of the Council's landscape consultant that this proposal would incur a significant adverse additional cumulative effect on the character of part of the *Rocky Mosaic* LCT (broadly equating to Unit B identified in the LVIA).

- With reference to paragraph 2.12, just because the author of the Applicant's response deems the effects to be '*localised*' this does not mean that they are not important. There are very few wind farm proposals which have, what could be termed as, more widespread '*regional*' effects.

- **Visible Aviation Lighting**

This is a rapidly changing technology with no similar specification of lighting on operational wind turbines to enable judgements as to likely night-time effects to be made in the field. The examples stated in paragraph 1.3.28 of the updated Technical Appendix 6.3 as having been visited by the LVIA team are also acknowledged as not having the same specification of visible aviation lighting as the proposal. Comparison of the night-time visualisations produced in a cross-section of current EIA-Rs reveal a divergence in the nature of visualisations and the findings on the significance of effects. In particular, review of the recently submitted Clachaig Glen II wind farm proposal demonstrates the disparity between the depiction of lighting effects despite directional intensity mitigation having also been taken into account in the generation of the visualisations and

visualisations produced from similar viewpoint elevations. It is only correct that a precautionary approach should be taken in appraising wind farm applications with visible aviation lighting given the low-lighting levels present in Argyll and Bute and the potential for cumulative effects to arise with other proposed wind farms featuring such lighting.

- **Conclusions**

It is acknowledged that all wind farms will have significant adverse landscape and visual impacts but what is important to consider is the nature and degree of severity of these effects in making recommendations to the Council. The LV Review provides an impartial analysis of likely significant adverse landscape and visual effects but also the mitigating features of the proposal are clearly noted, for example the limited visibility of turbines in views from the east across Loch Fyne. It is not appropriate for the Applicant to determine the acceptability of the proposal in landscape and visual terms as is done in paragraph 3.4 as this can only be determined by the decision maker (the Council in this instance) upon receipt of the full range of information which needs to be considered in the planning judgement.