

**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 the proposed Rowan wind farm on Land Approximately 4.5km North West of Tarbert, Argyll & Bute

Reference No: 22/00385/S36

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 Northwest of Tarbert, Argyll & Bute

SUPPLEMENTARY REPORT NO. 4

1. INTRODUCTION

Since completion of Supplementary Report 3, the Applicant has raised several concerns and asked that they are addressed by means of a Supplementary Report.

2. CONCERNS RAISED BY APPLICANT

The Applicants concerns about Supplementary Report 3 may be summarised as follows:

- The Applicant was naturally disappointed to note that the Council have introduced a (potential and perceived) regionalised cumulative effect as a primary reason for objection to the scheme. They respect the concerns the Council have around Sheirdrim and Rowan (whilst not agreeing on the balance or acceptability), however, as per the EIA Report, the main contributor to these effects, particularly on Dun Skeig, is Sheirdrim and not Rowan.

Officer Comment: Officers have been consistently clear on the major cumulative effects that would be associated with the combination of Rowan wind farm and Sheirdrim Renewable Energy Development. This position has not changed. What has changed is that, following further consultation with the Council's Landscape Consultant and reconsideration against NPF4, the reason for Objection has been revised to focus on the regional impacts of the proposal rather than regional and localised impacts. These impacts are not new.

- Like the aviation position, whereby the Applicant is very confident of the fact that both NATS and GPA (Glasgow Prestwick Airport) objections can and will be lifted, and this is acknowledged via text within the Committee Report that if these are lifted then the Council's objection would be also, they note that there is no corresponding position on Sheirdrim. The Applicant has a key concern therefore that Members only have the benefit of the Council's position under the worst case (and potentially unrealised) combined cumulative scenario, with Sheirdrim and the Council's Report is silent on the acceptability

of Rowan as a proposal on its own merits. This requires to be addressed to give Members the full account of where the Council stands should Sheirdrim be refused in the coming months.

Officer Comment: This matter has been addressed and has been included in the revised recommendation. It is recommended that the ECU be advised that if Sheirdrim is refused the Council's landscape objection would be withdrawn.

- The Applicant also wishes to add that estimated timescales for a decision on Sheirdrim are in the region of July to October based on discussions with the ECU. They are sure this is already noted but worth stating – it is therefore entirely plausible that were the Council minded to not object (either via Officers or Members) then it is the Ministers who would have to consider this cumulative scenario for Sheirdrim where Rowan could be part of a consented baseline. The Applicant would be confident that aviation objections would be lifted before a Sheirdrim decision.

Officer Comment: The Council has been consulted by the ECU on Rowan. We must therefore respond based on the current cumulative scenario. The current scenario includes Sheirdrim Renewable Energy Development. Sheirdrim Renewable Energy Development must be considered in the cumulative assessment. The advice of the Council's Landscape Consultant is that Rowan is not acceptable when considered cumulatively with Sheirdrim. To clarify, should Sheirdrim be refused, then taking into account the new policy context of NPF4, it is now considered that Rowan would be acceptable from a Landscape & Visual Impact perspective.

- The Applicant has raised concern that the Energy Consents Unit will not await the Sheirdrim decision before passing Rowan to the DPEA to begin Public Inquiry proceedings. They are concerned that once it reaches this stage and a Reporter were appointed and were Sheirdrim to be refused it may not be as simple for the Council to withdraw its objection.

Officer Comment: If a Reporter were to be appointed, and Sheirdrim were to be refused, and all the outstanding aviation objections were resolved the Reporter would see from the Council's consultation response that we would not intend to object in that situation. It is considered that the reasons for this are set out clearly in the recommended response.

3. CONCLUSION & RECOMMENDATION

To clarify the Council's position, it is recommended that an additional note is attached to the recommendation to the ECU as detailed in supplementary report number 3. This additional note states that if Sheirdrim Renewable Energy Development is refused by Scottish Ministers then Argyll & Bute Council would no longer object to Rowan wind farm on landscape and visual grounds. No change is recommended to the reason for objection or the note about the Council's position in respect to aviation which states that in case of

the aviation objections being withdrawn the Council would no longer object on these grounds.

4. RECOMMENDED REASONS FOR OBJECTION TO: 22/00385/S36

1. Landscape & Visual Impact (including cumulative)

The proposed development site lies within the Knapdale Upland Forest Moor Mosaic Landscape Character Type (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.

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 coastal fringes of this loch. The containment provided by landform is however diminished in views from the south around West Loch Tarbert 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. The proposal would significantly affect the character of West Loch Tarbert and views from the A83, the Islay ferry route, settlement, and recreation routes on the south-eastern shores of the loch. Proposed aviation lighting would increase the duration of these significant adverse effects. While it is acknowledged that the extent of these significant adverse landscape and visual effects is confined to the waters and south-eastern shores of West Loch Tarbert and the proposal is well screened and/or distant from other sensitive locations, there is concern about the effects on the tourist routes of the A83 and the Islay ferry which are regionally important within Argyll and Bute.

The potential cumulative effects of visible aviation lighting on character and views are also a concern given the number of recent applications for turbines >150m in Argyll & Bute requiring such lighting, including application stage: Narachan, Earraghail, Clachaig Glen and this proposal although we consider that these effects could be mitigated to an acceptable degree by the adoption of an Aviation Detection Lighting System which would significantly reduce the duration of visible night-time lighting.

The principal concern is, however, the cumulative landscape and visual effects likely to occur with the application-stage Sheirdrim wind farm. If the Sheirdrim proposal is consented on appeal, it is considered that the addition of the Rowan proposal would result in significant combined cumulative landscape and visual effects on the West Loch Tarbert area with a substantial increase in the extent of major adverse effects. It is considered that the nature of these significant effects on landscape and visual interests would be of regional importance, affecting not just the tourist routes of A83 and the Islay Ferry but also settlement and recreation routes including views to and from the nationally important scheduled monument of Dun Skeig.

In conclusion, it is considered that the cumulative landscape and visual impact of this proposal with Sheirdrim is unacceptable.

Having due regard to the above it is concluded that the proposal will have significant adverse cumulative landscape and visual impacts and is therefore inconsistent with the provisions of: 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; the Argyll & Bute Landscape Wind Energy Capacity Study 2017; the Onshore wind policy statement and Policies 4 (Natural Places) and 11 (Energy) of National Planning Framework 4 (NPF4)

2. Aviation

Argyll & Bute Council will assess development proposals with the aim of preventing unnecessary dangers to aircraft. Policy requires that development is refused where it would constrain the present and future operations of existing airports and airfields.

National Air Traffic Services Safeguarding (NATS) have advised that an unacceptable technical impact is anticipated, and they object. Glasgow Prestwick Airport advise that the development raises aviation safety concerns which have an operational impact on the airport as an air navigation services provider. Until all technical and operational aviation safety matters are addressed to the satisfaction of Glasgow Prestwick Airport, and a mitigation agreement is put in place for the life of the wind farm, the airport also objects to the proposal.

Local Development Plan Policy is clear that developments that have an adverse impact on the Safeguarding of Airports should be refused.

Having due regard to the above it is concluded that due to the fact that National Air Traffic Services Safeguarding (NATS) and Glasgow Prestwick Airport have advised the Energy Consents Unit that they object to the proposal, it will have an adverse impact on aviation and is therefore inconsistent 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, the Onshore Wind Policy Statement and Policy 11 (Energy) of the National Planning Framework 4 in this respect.

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:

- **Should Sheirdrim Renewable Energy Development be refused, then Argyll & Bute Council would no longer object to Rowan wind farm on Landscape & Visual grounds. Should Sheirdrim Renewable Energy Development be approved then the Council's objection would be maintained as per the recommendation in this report.**
- **If National Air Traffic Services (NATS) and Glasgow Prestwick Airport withdraw their objections, then Argyll & Bute Council would no longer object on aviation 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.**

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Date: 13th February 2023
Date: 14th February 2023

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