

29th March 2007

Reference Number: 06/02000/DET
Applicants Name: Argyll Windfarms Ltd.
Application Type: Detailed
Application Description: Erection of a wind farm consisting of 19 wind turbines, associated concrete foundations (maximum hub height 60metres and blade tip 101.5metres), construction of 9.6km of access tracks, upgrading of 6.9km of existing access tracks, two temporary construction compounds, ten borrow pits, on-site switchgear and control room station, hard-standing areas, connecting cabling and one permanent wind monitoring mast.
Location: Black Craig to Blar Buidhe, Glenfyne, Argyll

Revised Report

(A) THE APPLICATION

(i) Development Requiring Express Planning Permission:

- erection of 19 No. 2.5MW wind turbines; each with tubular tower, three blades, 60 metres to hub height and 101.5 metres to blade tip height, and associated concrete foundations (approx 20 x 20 metres each with temporary crane hardstandings of 15 x 45 adjacent);
- erection of one permanent lattice wind monitoring mast (60 metres high) and associated concrete foundations;
- erection of two temporary wind monitoring masts (no details);
- formation of site access involving upgrading and improvements to unclassified public C10 road;
- formation of on-site access tracks (9.6km) and upgrading of existing access tracks (6.9km);
- erection of on-site switch room/sub-station– (cement rendered walls and slated pitch roof) with septic tank (25 x 5 x 6 metres);
- formation of concrete batching plant;
- formation of two temporary construction compounds (100 x 50 metres and 30 x 20 metres);

(ii) Other aspects of the proposal (including requirement for separate consents):

- installation of 33 kv underground cabling to link turbines (5.9km);
- installation of underground grid connection (to Sandbank sub-station), the subject of a separate application;
- formation of 10 No. borrow pits with estimated extraction of 50,000m³ of stone (subject to separate mineral consent applications);
- preparation of Habitat Management Plan.

(B) RECOMMENDATION

It is recommended that planning permission be **refused** for the reasons set out below.

(C) PROCEDURAL MATTERS

(i) Discretionary Hearing

Given the Development Plan, views of consultees, the complexity of the proposal, its potential impacts on the landscape and environment of a wider area and the volume of representations, the Department would normally support a discretionary hearing. However, in this particular instance it would not be competent for the application to be approved in advance of a full appraisal of the proposal's impact on protected species, so no hearing is

recommended as this would be a costly and time consuming exercise with no tangible outcome in terms of the decision making process.

Members should also note that, as the Scottish Executive have advised against the use of suspensive conditions where a European Protected Species is involved and given that Scottish Natural Heritage has advised that there is not enough information to assess the full impact on golden eagle and to assess any mitigation, it is considered that it would not be competent to approve the application.

(ii) Referral to First Minister

The Council has an interest (albeit limited) in the application site, due to proposed improvements to the unclassified public C10 road and it would normally have been necessary to notify the application to the First Minister, if Members were minded to approve the application.

(D) DETERMINING ISSUES AND MATERIAL CONSIDERATIONS

This proposal is to develop a commercial wind farm 2-3km inland from Loch Striven on the South Cowal peninsula, to the south-west of Dunoon and north-west of Rothesay and Port Bannantyne.

The wind farm site as summarised above involves the erection of 19 wind turbines 101.5 metres high, located on a high moorland ridge running from just north of Kilmarnock Hill towards the Bishop's Seat between Inverchaolain Glen and Glen Fyne. The proposal also involves associated infrastructure, tracks and buildings.

Unlike previously approved nearby wind farm sites in South Cowal and North Argyll (e.g. Cruach Mor and Clachan Flats), the location of the proposed wind turbine development is not on a screened upland plateau or dip, but is on the crest of a rising broad moorland ridge (rising from 400-520 metres) above a steep west facing coastal slope to Loch Striven and east facing slope into Glen Fyne) where it will have significant visual impact on the Isle of Bute and parts of the Colintrave peninsula and Loch Striven coastline. It will also have a significant visual impact on users of the A886/ A844 Rothesay to Rhubodach roads and upon views from Kyles of Bute National Scenic Area and approaches, Bute Regional Scenic Area and South Cowal Regional Scenic Area/Coast, Firth of Clyde, Inverclyde and Loch Lomond and The Trossachs National Park area.

Increased visibility with 101.5 metre high turbines located on the top of this prominent 400-520 metre high ridge would also mean that the proposed development would be a significant contributor to the cumulative impact of wind farms in Argyll, Inverclyde and North Ayrshire.

The site is outwith any designated wind farm areas including Preferred Areas of Search but located within an area zoned as Very Sensitive Countryside in the adopted Cowal Local Plan 1995 and the Argyll and Bute Modified Finalised Draft Local Plan June 2006. The latter, although not finally adopted, contains many policies which should now be accorded significant weight, although some may be subject to objections which may have to be considered at a local plan inquiry. There are no policies which offer support for a wind farm in this location but there are many other policies that seek to protect and safeguard valuable natural resources and ecological resources including habitats and species and areas of panoramic quality.

Scottish Natural Heritage and the RSPB have objected to the proposal on nature conservation grounds, contending that insufficient information has been submitted to assess the full potential impact on golden eagle (Annex I species of the European Bird Directive 79/409/EEC), and on black grouse, whilst consequences for other protected bird species and mammals are not adequately quantified. It is concluded that the disturbance and collision risk associated with a wind farm located between feeding and nesting grounds supporting an Annex 1 European species are such that the threat of mortality should be avoided by directing development to sites where such protected populations would not be subject to risk.

Scottish Natural Heritage have also objected to the proposal on landscape and visual grounds as they consider that a wind farm development in a highland or coastal context that is relatively unmodified by built development will have inappropriate consequences for the settled coastal edge, for key viewpoints and views from offshore.

Objections have also been received from SEPA, Bute Community Council, South Cowal Community Council, The Ramblers Association, Dunoon and Cowal Marketing Group, Isle of Bute Marketing Group with various concerns raised by Historic Scotland, Inverclyde Council, Forestry Commission Scotland, Argyll and Bute Local Biodiversity Partnership, West of Scotland Archaeological Service and Visit Scotland. A total of 151 letters of representation have been received with 112 letters of objection and 39 letters in support of the application.

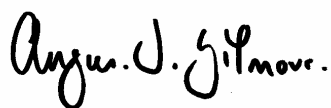
Having regard to SNH and RSPB position as statutory consultees in this case, I am not persuaded, despite the applicant's assumptions made to predict the extent of risk to protected bird species i.e. golden eagle, in addition to black grouse and other species, that the residual risk to these birds will not be significant in the terms of the

Birds Directive. In the absence of conclusive survey information on protected and other species, the Council must adopt a precautionary approach to the proposed development on nature conservation grounds.

I also agree with the view expressed by Scottish Natural Heritage and objectors that the location of this wind farm will be of more significance in terms of its landscape, visual and cumulative impacts than other North Cowal wind farm sites approved recently, as it does not share the same degree of shielding by the effect of landform and distance, which has benefited previously approved sites. Turbines of this height sited on the landscape and not within it will, however, give rise to more significant impacts on areas of acknowledged landscape value. Their presence in views from the Isle of Bute in particular will, in my view, be unacceptable.

The applicant has requested that this application be deferred until further additional information including survey details and images be submitted for consideration. Notwithstanding this request, the department has an obligation to determine applications. Although additional surveys may alleviate concerns regarding ornithological, ecological or hydrological interests, they could not, in the department's view, reduce the high visual impact that the development would have on the surrounding landscape and population.

I therefore conclude that the proposal conflicts with the interests of European Nature conservation legislation in particular, and with development plan policy and national guidance generally, in terms of its adverse consequences for biodiversity and the scenic value of landscape, particularly upon views towards the Isle of Bute and its coastline, Inverclyde and the Firth of Clyde.



Angus J Gilmour, Head of Planning Services

Case Officer:	B. Close	01369-70-8604
Area Team Leader	D. Eaglesham	01369-70-8608

REASONS FOR REFUSAL RELATIVE TO APPLICATION 06/02000/DET

1. The development proposed would be located on the crest of prominent rising hill ground facing the eastern coastline of the Isle of Bute, where it would not share the locational advantages of previously permitted wind farm sites in North Cowal, which are located on inland sites that benefit from the shielding effect of topography and the moderating influence of distance from sensitive viewpoints. The application site more closely relates to the coastal margin, where, it will by virtue of its scale and presence in the landscape, have a more prominent visual impact on the skyline above the coastal edge, and would in turn have adverse consequences for the maintenance of landscape character. The impact of the development would be especially significant in terms of views towards the Isle of Bute, Loch Striven and parts of the Kyles of Bute National Scenic Area including the approaches, the Firth of Clyde, views from the A78 Greenock to Largs coast road, various locations within Inverclyde, and from Clyde ferry routes. The siting of these high structures on the crest of a prominent moorland ridge would also have serious consequences for the cumulative impact of wind farm development in Cowal and Inverclyde. The development by reason of its siting and scale would therefore give rise to adverse visual and landscape impacts, which would be contrary to Policies SI 1, DC6, DC 8, RE1 of the 'Argyll and Bute Structure Plan' 2002; and to Policies RUR 1, RUR 2, RUR 13 of the 'Cowal Local Plan' adopted 1995, which in particular, affords special protection to the Kyles of Bute National Scenic Area and Bute Regional Scenic Area in addition to the Bute and South Cowal Regional Scenic Coast and areas of local landscape significance. It would also be contrary to Policies ENV 9, ENV 10 of the 'Argyll and Bute Modified Finalised Draft Local Plan June 2006, and would conflict with Policies WF 1 and WF 2 of the Council's non-statutory 'Wind Farm Policy' 1995, and with government guidance given in SPP6 (2007) and PAN 45 (2002).
2. The wind farm is proposed in a location that is known to support golden eagle *Aquila chrysaetos* (Annex I species of the European Birds Directive 79/409/EEC and Argyll and Bute LBAP species) and black grouse *Tetrao tetrix* (UK BAP and Argyll and Bute LBAP species).

Golden eagle is afforded special protection under Schedule 1 of the Wildlife and Countryside Act 1981 (as amended). This species is also listed under Annex 1 of the European Birds Directive 1979, and as such they are a material consideration in the determination of a planning application.

It is considered that impacts on golden eagle would be significant on the basis that the current pattern of intense flight/feeding activity within the development footprint could have a significant impact upon the golden eagle territory in this area. The Environmental Statement does not include sufficient survey information including collision risk modelling scenarios and full details of the proposed mitigation package including impact on black grouse where insufficient information including grid connection works are required to fully assess whether this species would be at risk.

Due to the lack of an appropriate assessment on the impact to golden eagle and black grouse populations including collision risk modelling, the Planning Authority concurs with the precautionary approach taken by SNH and RSPB in this instance. The vulnerability of these species to avoidable attrition, and the status of designations affording them protection, are such that inappropriate development presenting unacceptable risk of mortality should be resisted. It is not concluded that mitigation measures proposed are sufficient to demonstrate with confidence that the integrity of the site is capable of being maintained should the development be permitted. The proposal will adversely affect the integrity of the habitat and impact on these protected species by virtue of the likely harmful effects on qualifying interests arising from risk of disturbance, and also the adverse consequences for the distribution of species within the site as a result of construction, operation and maintenance. It is also considered that the introduction of tall structures with rotating components will introduce significant risk to golden eagle (and other species) from collision during the operation of the wind farm.

As such the proposal is contrary to the provisions of the European Birds Directive 79/409/EEC in terms of golden eagle *Aquila chrysaetos* (Annex I species) and the provisions of the Wildlife and Countryside Act 1981 which seek to protect, maintain and enhance these species habitats.

The proposal would therefore have significant adverse implications for nature conservation interests of acknowledged importance, contrary to Policies STRAT SI 1, DC 7 and RE 1 of the 'Argyll and Bute Structure Plan' 2002; to Policy RUR 1, RUR 2 of the 'Cowal Local Plan' adopted 1995; and to Policies ENV 2, ENV 6 of the 'Argyll and Bute Modified Finalised Draft Local Plan June 2006. It would also conflict with Policies WF 2 and WF 9 of the Council's non-statutory 'Wind Farm Policy' 1995, and with government guidance given in SPP6 (2007), NPPG 14 (2005), PAN 45 (2002) and Circular 6/95 (as amended).

(continued)

REASONS FOR REFUSAL RELATIVE TO APPLICATION 06/02000/DET

3. The proposal is not supported by adequate information, nor are there sufficiently specified mitigation measures, to enable it to be concluded that the development would not have adverse consequences for other nature conservation interests of acknowledged importance; including peregrine, merlin, hen harrier (all under Schedule 1) and red squirrel (a protected species under Schedule 5 of the Wildlife and Countryside Act 1981). The deficiencies in the available information could lead to an underestimation of the development impacts on these protected (and unprotected) species, contrary to the maintenance of biodiversity, and it would therefore be inappropriate to consider the granting of a development consent in the absence of reliable information to enable a realistic assessment of the magnitude of development impacts. In the absence of such confidence as to the extent of ecological impacts, the proposal would therefore conflict with Policies STRAT SI 1, DC 7 and RE 1 of the 'Argyll and Bute Structure Plan' 2002; and to Policies ENV 2 and ENV 6 of the 'Argyll and Bute Modified Finalised Draft Local Plan June 2006. It would also conflict with Policy WF 2 and WF 9 of the Council's non-statutory 'Wind Farm Policy' 1995, and with government guidance given in SPP6 (2007), NPPG 14 (2005) and PAN 45 (2002).
4. The proposal is not supported by adequate information, nor are there sufficiently specified mitigation measures, to enable it to be concluded that the development would not have adverse consequences on various Historic Gardens and Designed Landscapes, in particular to Castle Toward Designed Landscape and Ardgowan House Designed Landscape. It is considered that the existing high open moorland landscape character punctuated by nineteen 101.5 metre high man-made industrial structures would give rise to adverse visual and landscape impacts on these historic settings, which would be contrary to Policies SI 1, DC 8, DC9, RE1 of the 'Argyll and Bute Structure Plan' 2002; and to Policies RUR 1, BE1 of the 'Cowal Local Plan' adopted 1995, The proposed development would also be contrary to Policies ENV 11 of the 'Argyll and Bute Modified Finalised Draft Local Plan June 2006, and would conflict with Policies WF 1 and WF 2 of the Council's non-statutory 'Wind Farm Policy' 1995, and with government guidance given in SPP6 (2007) and PAN 45 (2002).

APPENDIX RELATIVE TO APPLICATION 06/02000/DET

A. POLICY OVERVIEW

The **EC Council Directive on the Conservation of Wild Birds (79/409/EC)** (the Birds Directive) provides for the protection of all wild birds and their habitats within the European Community. It requires Member States to take measures to preserve a sufficient diversity of habitats for all species of wild birds naturally occurring within their territories in order to maintain populations at ecologically sound levels, and to take special measures to conserve the habitats of rare and migratory species.

Scottish Planning Policy Guideline 6 (SPP6 – 2007) ‘Renewable Energy Developments’
Planning Advice Note 45 (PAN 45 – revised 2002) ‘Renewable Energy Technologies’

SPP6 advises that:

The Scottish Ministers have set a target of generating 40% (6GW) of Scotland’s electricity from renewable sources by 2020. (para 5)

In the first instance, the focus should be on facilitating early progress towards national targets in an environmentally acceptable way whilst ... recognising that new distribution and transmission networks need to be developed to harness Scotland’s renewables potential. (para16)

The Scottish Ministers expect planning authorities to make positive provision for renewable energy developments by:

- Supporting a diverse range of renewable energy technologies including encouraging the development of emerging and new technologies;
- Recognising the importance of fully engaging with local communities and other stakeholders at all stages of the planning process
- Guiding development to appropriate locations and providing clarity on the issues that will be taken into account when assessing specific proposals; and
- Maximising environmental, economic and social benefits;

while at the same time:

- Meeting international and national statutory obligations to protect designated areas, species and habitats and protecting the historic environment from inappropriate forms of development; and
- Ensuring impacts on local communities and other interests are satisfactorily addressed. (para 17)

Development plan policies should reflect the policies in the SPP (para 39) but planning authorities should continue to determine those applications that are ... before them ahead of revised local policies being put in place. (para 40) Decisions on planning applications should be made in accordance with the development plan unless material considerations indicate otherwise (para 45).

Consideration of the significance of any adverse impacts of a renewable generation proposal should have regard to the projected benefits of the proposal in terms of the scale of its contribution to the Scottish Executive’s targets for renewable energy (para 54).

Other relevant national planning policy guidance includes:

- SPP 1: The Planning System (2002)
- NPPG 5: Archaeology and Planning (1998)
- NPPG 14: Natural Heritage (2005)
- SPP 15: Rural Development (2005)
- NPPG 18: Planning and the Historic Environment (1999)
- SOED Circular 6/95 (as revised June 2000): Habitats Directive.

The underlying principle of all NPPGs and related policies is sustainable development. Some NPPGs are intended to encourage development, while others are intended to safeguard resources and features of national and international importance. Policies in the latter group do not necessarily preclude renewable energy developments, but development proposals should avoid significant adverse impact upon the character, quality, integrity and setting of a designated resource.

Argyll and Bute Structure Plan 2002

One of the main aims of the Plan is to “promote the safeguarding and the enhancement of the natural and historic environment and the maintenance of biodiversity”. In Key Diagram 2, the proposed wind farm site is located almost midway between the key main town settlements of Dunoon and Rothesay, within an area zoned as Very Sensitive Countryside.

Policy STRAT SI 1 – Sustainable Development.

Argyll and Bute Council shall adhere to the following principles in considering development proposals, and in its policies, proposals and land allocations in Local Plans. It will seek to:-

- a) maximise the opportunity for local community benefit;
- b) make efficient use of vacant and/or brownfield land;
- c) support existing communities and maximise the use of existing service infrastructure;
- d) maximise the opportunities for sustainable forms of design, including energy efficiency;
- e) avoid the use of prime quality or locally important good quality agricultural land;
- f) use public transport routes fully and increase walking and cycling networks;
- g) avoid the loss of recreational and amenity open space;
- h) conserve the natural and built environment and avoid significant adverse impacts on biodiversity, natural and built heritage resources;
- i) respect the landscape character of an area and the setting and character of settlements;
- j) avoid places where there is a significant risk of flooding, tidal inundation, coastal erosion or ground instability; and
- k) avoid having an adverse effect on land, air and water quality.

Policy STRAT DC6 – Development in Very Sensitive Countryside

Encouragement will only be given to specific categories of development on well chosen sites which include renewable energy related development which is supported by policies STRAT RE1 and 2.

Developments which do not accord with this policy are those with incongruous and unacceptable siting, scale and design characteristics including development which breaches the overall carrying-capacity of the wider landscape, coastscape and natural environment.

Policy STRAT DC 7 – Nature Conservation and Development Control

- C) Development which impacts on Local Wildlife Sites or other nature conservation interest, including sites, habitats or species at risk as identified in the Local Biodiversity Action Plan shall be assessed carefully to determine its acceptability balanced along with national – or local – social or economic considerations.
- D) Enhancement to nature conservation interest will also be encouraged in association with development and land use proposals.

Policy STRAT DC 8 – Landscape and Development Control

A) Development which, by reason of location, siting, scale, form, design or cumulative impact, damages or undermines the key environmental features of a visually contained or wider landscape or coastscape shall be treated as ‘non-sustainable’ and is contrary to this policy. Outwith the National Park particularly important or vulnerable landscapes in Argyll and Bute are those associated with:

- 1) National Scenic Areas;
- 2) Historic landscapes and their settings with close links with archaeology and built heritable and/or historic gardens and designed landscapes;
- 3) Landward and coastal areas with semi-wilderness or isolated or panoramic quality.

B) Protection, conservation and enhancement to landscape will also be encouraged in association with development and land use proposals.

Policy STRAT DC 9 – Historic Environmental and Development Control

Protection, conservation, enhancement and positive management of the historic environment is promoted. Development that damages or undermines the historic, architectural or cultural qualities of the historic environment will be resisted; particularly if it would affect a Scheduled Ancient Monument or its setting, other recognised architectural site of national or regional importance, listed building or its setting, conservation area or historic garden or designed landscape.

Policy STRAT RE 1 – Wind Farm/Wind Turbine Development

A) Wind farm development is encouraged where it is consistent with STRAT DC 7, 8 and 9. Proposals shall be supported where it can be demonstrated there is no significant adverse effect on:

- Local communities;

- Natural environment;
- Landscape character and visual amenity;
- Historic environment;
- Telecommunications, transmitting or receiving systems; and

B) The Council will identify, with appropriate justification in the Local Plan, broad areas of search or, where appropriate, specific sites where wind energy development may be permitted. The Council will also indicate sensitive areas or sites which it is adjudged that for overriding environmental reasons, proposals for wind farm development would only be considered in exceptional circumstances in line with the criteria set out above. Issues associated with the cumulative impact of wind farm and wind turbine developments will be addressed. This will be done in partnership with the industry and other interested parties including local communities.

Cowal Local Plan 1993 (adopted 30th October 1995)

The main aims of the plan are to encourage economic regeneration and an increase in population, whilst seeking to protect and enhance the environmental quality of Cowal for residents and visitors from inappropriate and unsympathetic development in areas of scenic and nature conservation importance. Within this plan, the wind farm site is located within Very Sensitive Countryside, where under STRAT4 of the Cowal Settlement Strategy, development with a specific requirement to be located in such countryside zones will be subject to locational/operational need and low environmental impact being demonstrated. The site is located within the Bute and South Cowal Regional Scenic Area but would also have a visual impact on nearby Kyles of Bute National Scenic Area, Bute Regional Scenic Area and Central and East Cowal Local Scenic Areas.

The preamble to POL RUR 1 states, "Much of Cowal's landscape has been identified as being of scenic importance where the area around the Kyles of Bute has been designated as a National Scenic Area. Elsewhere in Cowal, a number of Regional Scenic Areas and Local Scenic Areas have been identified. There is a need to protect these areas and other locations of more local significance from development which would have an adverse impact".

POL RUR 1 'Landscape Quality'

The Council will seek to maintain and where possible enhance the landscape quality of Regional Scenic Areas and Coasts and areas of local landscape significance, and within these areas will resist prominent or sporadic development which would have an adverse environmental impact:

- a) National Scenic Area – Kyles of Bute;
- b) Regional Scenic Area – Bute; Regional Scenic Coast – Bute and South Cowal including Loch Striven and Kyles of Bute;
- c) Area of local landscape significance – Central and East Cowal.

It should also be noted that in view of its scale and visibility from a distance, the proposal would have consequences for landscape designations beyond the Cowal Local Plan area – namely the Loch Lomond and Trossachs National Park area, the Rosneath peninsula, Inverclyde and the Isle of Bute.

Proposals for development in or affecting National Scenic Areas, Regional Scenic Areas and Coasts or areas of local landscape significance will be required to be assessed against the following criteria:

- (a) environmental impact
- (b) locational/operational need
- (c) economic benefit
- (d) infrastructure and servicing implications

POL RUR 2 : Nature Conservation

The wildlife resource of Cowal provides special interest for tourists and local residents. The Council will resist developments and land use changes which would erode or have an adverse effect on features of wildlife and scientific value.

POL RUR13: Development in the Countryside

The Council supports development in the countryside which is sensitive to and integrated with their surroundings.

In terms of tourism, Dunoon is identified as a main holiday resort/tourist destination, where many policies aim to revitalise Dunoon and Cowal as a major tourist destination (POL TOUR 1). While many of the policies relate to

tourist accommodation, others seek to attract visitors by enhancing water based facilities (POL TOUR 7), natural recreational resources (POL TOUR 11), tourist routes and trails (POL TOUR 15) where Cowal's basic attraction is the fine and varied landscape, lochs and coasts.

POL BE 1: Ancient Monuments and Listed Buildings

The Council will encourage new works or uses which will result in the preservation and/or positive enhancement of Buildings of Architectural and Historic interest, ancient monuments and Sites of archaeological Importance. The Council will normally permit only those alterations to Statutory listed Buildings which maintain and/or enhance their special architectural or historic qualities. The Council will seek to protect the sites and settings of Buildings of Architectural and Historic Importance from development which would have a detrimental impact.

Argyll and Bute Local Plan (Modified Finalised Draft) June 2006

Within this plan, the proposed wind farm site is located within an area of Very Sensitive Countryside and within a Constrained Area in respect of the Wind Farm Policy Map (as modified July 2006). *It is even interesting to note that in the earlier Finalised Draft version dated May 2005, the development site was wholly outwith a Preferred Area of Search, that has now been removed as part of the Finalised Draft Local Plan process.* Additionally, the site is contained within an Area of Panoramic Quality and is in very close proximity to other similar zonings covering the Isle of Bute and the Colintrave peninsula.

The main objectives of the Argyll and Bute Local Plan include:

Economic and Social Objectives SI 1

- a) to improve economic competitiveness and the relatively poor economic performance of Argyll and Bute as a whole.
- b) to enhance the economic and social prospects of the geographically diverse local communities in Argyll and Bute.
- c) to promote appropriate responses to the variety of challenging economic, transport-related and planning circumstances facing these local communities.
- d) to treat the rich natural and historic environment of Argyll and Bute as a not fully realised economic asset which, if safeguarded and enhanced, can stimulate further investment and increased economic activity.

Environmental Objectives SI 2

- a) to safeguard the diverse and high quality natural and built heritage resources, including the abundant landward and maritime biodiversity of Argyll and Bute.
- b) to reinforce the strength of protection given to the European and national statutorily protected nature conservation sites, habitats, species and built heritage sites, with which Argyll and Bute is particularly richly endowed.
- c) to enhance and invest in the quality of the natural and built environment and to engage development more effectively with this enhancement process.
- d) to encourage development of a scale, form, design and location appropriate to the character of the landscape and settlements of Argyll and Bute.

Policy LP ENV 2 – Development Impact on Biodiversity

When considering development proposals the Council will seek to contribute to the delivery of the objectives and targets set by the Local Biodiversity Action Plan (LBAP). Proposals that incorporate existing site interests within the design wherever possible will be encouraged. Where there is evidence to suggest that a habitat or species of local importance exists on a proposed development site, the Council will require the applicant, at his/her own expense, to submit a specialist survey of the natural environment.

Applications with significant adverse impacts will be refused unless the developer proves to the satisfaction of the Planning Authority that the following criteria are met:

- a) There is no suitable alternative site for the development; and
- b) Satisfactory steps are taken to avoid, mitigate or compensate for damage.

As this policy has not been subject to adverse representation, it may be accorded significant weight as a material consideration in the determination of this application.

Policy LP ENV 6 – Development Impact on Habitats and Species

In considering development proposals, the Council will give full consideration to the legislation, policies and conservation objectives that may apply to the following:

- Habitats and species listed under Annex I, II and IV of the Habitats directive
- Species listed under Annex 1 of the Birds Directive (golden eagle are listed as Annex 1 species of the European Birds Directive 1979);

- Species listed on Schedules 1 (golden eagle, hen harrier, merlin, peregrine), 5 (red squirrel) and 8 of the Wildlife and Countryside Act 1981, (and as amended by the Nature Conservation(Scotland) Act 2004);
- Habitats and Species listed in the UK Biodiversity Action Plan (includes black grouse); and
- Habitats and Species which are widely regarded as locally important as identified in the Local Biodiversity Action Plan (includes both golden eagle and black grouse, but also hen harrier, skylark, song thrush, red squirrel).

As this policy has not been subject to adverse representation, it may be accorded significant weight as a material consideration in the determination of this application.

Policy LP ENV 9 – Development Impact on National Scenic Areas (NSAs)

Development in, or adjacent to National Scenic Areas including Kyles of Bute that would have a significant adverse effect on the NSA will be refused unless it is demonstrated that the objectives of the designation and overall integrity of the area will not be compromised, and that any significant adverse effects on the quality for which the area has been designated are clearly outweighed by social and economic benefits of national importance.

Policy LP ENV 10 – Development Impact on Areas of Panoramic Quality

Development in or adjacent to an Area of Panoramic Quality will be resisted where its scale, location or design will have a significant adverse impact on the character of the landscape unless it is demonstrated that:

- a) any significant adverse effects on the quality for which the area has been designated are clearly outweighed by social and economic benefits of national or regional importance.
- b) Where acceptable, development must also conform to Annexe A of the Local Plan.

As this policy has been subject to adverse representation, it may only be accorded little weight as a material consideration in the determination of this application, as it is likely to be subject to modification prior to the adoption of the plan.

Policy LP ENV11 – Development Impact on Historic Gardens and Designed Landscapes

Where development would affect a heritage asset or its setting, measures must be taken to preserve and enhance the special interest including planned historic views of, or from the site or buildings within it.

Policy LP ENV16 – Development Impact on Scheduled Ancient Monuments

There will be a presumption in favour of retaining, protecting, preserving and enhancing Scheduled Ancient Monuments (SAM's) and their settings. Developments that have an adverse impact on SAM's will not be permitted unless there are exceptional circumstances.

As this policy has not been subject to adverse representation, it may be accorded significant weight as a material consideration in the determination of this application.

Policy LP REN 1 – Commercial Wind Farm Development

a) Wind farm and wind turbine development is not compatible with constrained areas *as defined on the Wind Farm policy Map*), and will be resisted unless, exceptionally it can be demonstrated that it will not have an adverse effect on those interests which define the constrained nature of the area and the criteria listed in b) below.

b) Areas with some capacity to accommodate commercial wind farms and wind turbines are identified on the Wind farm Policy Map as 'Preferred Areas of Search'..... *(the application site lies outside the areas so identified).*

As this policy has been subject to adverse representation, it may only be accorded little weight as a material consideration in the determination of this application, as it is likely to be subject to modification prior to the adoption of the plan.

Policy LP TRAN1 – Public Access and Rights of Way

Development proposals shall safeguard public rights of way, core paths and important public access routes. Where these may be prejudiced by a development, including during construction and upon completion, the developer shall be expected to incorporate appropriate alternative or modified public access provisions.

Policy LP TRAN 4 – New and Existing, Public Roads and Private Access Regimes

Where a site is served by an existing private access and considered to be of such a poor standard the proposal may be considered unacceptable unless commensurate improvements are made. Where an existing private access regime is considered to be of such poor standard as to be unsuitable for additional vehicular traffic and is not capable of commensurate improvements the proposals will be resisted by the Planning Authority unless the

private access regime is brought up to a full adoptable public road standard as directed in the Council's Road Development Guide.

Policy LP TRAN 5 – Off Site Highway Improvements

Where development proposals will significantly increase vehicular traffic on substandard private or public approach roads, then developments will be required to contribute proportionately to improvements to an agreed section of the public or private road network.

Wind Farm Policy 1995

The Council's Wind Farm Policy 1995 arose from the need to address the complex issues regarding the impact of such developments on the environment and to assist developers in site selection and to indicate the type of information required. This remains relevant, and in the context of this planning application relevant policies include:

Policy WF 1 states that the Council will support wind farms which are consistent with existing development plan policies and of a high quality of design but will resist developments which either cumulatively or individually, would have an adverse impact on the environment by virtue of scale, location, setting or design.

Policy WF 2, other than exceptional circumstances, presumes against wind farm developments in or affecting Special Protection Areas, Special Areas of Conservation and Ramsar sites; and National Scenic Areas, SSSI's and Natural Heritage Areas.

Policies WF 6 and WF 7 seek to resist wind farms within 300m of residential properties or which are likely to result in shadow flicker on occupied premises or be a potential distraction to drivers.

Policy WF 8 states that developments which would have an adverse affect on telecommunications, will be resisted.

Policy WF 9 states that the Council will protect bird species covered by EC Directives by resisting wind farms which are likely to affect the breeding, feeding, roosting and flight areas (ie. areas of caution) of specially protected bird species.

Policy WF11 seeks to minimise long term visual and ecological impact and seeks the developer to enter into a legal agreement and financial bond to secure the highest quality of re-instatement.

Policy WF12 states that wind farms should normally be operational within two years of approval.

Policy WF13 recognises that wind farms are essentially temporary structures and states that the Council will:

- impose conditions on permissions to ensure that such sites are fully restored upon the expiry of consent;
- seek legal agreements to secure a financial bond to cover such costs;
- normally grant permission for an initial period of 20 years.

B. OTHER MATERIAL CONSIDERATIONS

(i) Site History

Detailed planning permission (ref. 05/00601/DET) was granted on 27th June 2005 for the erection of a temporary 60-metre wind monitoring mast at Site 1 (south west of Black Craig) until 27th June 2008.

Detailed planning permission (ref. 05/00604/DET) was granted on 27th June 2005 for the erection of a temporary 60-metre wind monitoring mast at Site 2 (south west of The Bishop's Seat) until 27th June 2008.

Both monitoring masts were duly erected on these sites.

Related Wind Farm Developments

A proposal for a 14 turbine wind farm development (125 metres to blade tip) on Corlarach Hill by West Coast Energy, on the adjacent easterly ridge across Glen Fyne from Black Craig has been the subject of a scoping opinion.

A third scheme proposed on the north east ridge of the Bishop's Seat at Eilligan, for 16 turbines is at scoping stage.

On the eastern side of the Clyde, an application has been submitted to Inverclyde Council for a 10 turbine wind farm development at Leapmoor Forest, above Inverkip. This application is currently being considered.

The nearest wind farm site to Black Craig is at Cruach Mor in Glendaruel (ref. 01/01553/DET), approximately 12 km to the north-west where 35 turbines are now operational.

(ii) Consultations

Scottish Natural Heritage (SNH) (response dated 29th November 2006): Object to the proposal on nature conservation and landscape/visual grounds, for the following summarised reasons:

1. SNH disagrees with the conclusion of the ES that impacts on golden eagle would not be significant. SNH consider that the current pattern of intense flight activity within the development footprint could have a significant impact upon the golden eagle territory in this area. While it is indicated that further studies are to be undertaken during winter 2006/07 this must include collision risk modelling scenarios and full details of the proposed mitigation package highlighted within the ES. SNH also note that black grouse could be affected by the proposed development.
2. SNH consider that the proposal would have a significant adverse impact on the landscape and visual interests in the area including a major alteration to the characteristics of the Steep Ridgeland and Mountains Landscape Character Type; important views from neighbouring parts of Bute, the A886 Port Bannantyne to Rhubodach road, and from the Clyde ferry routes, in which the wind farm site is presently seen in a highland or coastal context that is relatively unmodified by built development.
3. In terms of potentially significant additional cumulative landscape and visual impacts, SNH consider that this has been inadequately addressed within the ES because it does not include an assessment of all cumulative impacts, nor of the impacts on all relevant landscape character types.

SNH also offer comments on access and recreation, habitat management, decommissioning, grid connection and how impacts on the natural heritage could be reduced.

Royal Society for the Protection of Birds (response dated 13th November 2006): Objection based on potential impact on golden eagle (Annex 1 species of the European Bird Directive). EIA contains insufficient information on ornithological impacts on this species.

Argyll and Bute Local Biodiversity Partnership (response dated 10th October 2006): Comments concerning protection and monitoring of bird species, site monitoring, Habitats Management Plan and Red Squirrel interests.

Scottish Environment Protection Agency (SEPA) (responses dated 3rd November 2006 and 16th November 2006 and 7th & 9th March 2007): Objection based on lack of information concerning culverting and water abstraction. Other specific comments relate to pollution prevention, winter working, foul drainage, water supplies, peatlands, concrete batching, nature conservation area, fuel storage area, substation – bunding and oil storage and waste management licensing. Latest response highlights concerns regarding potential peat slide hazard and risk.

South Cowal Community Council (response dated 13th December 2006) – Objection on the basis of insufficient information regarding wildlife in particular ornithological surveys, transport and potential impact on existing road networks if Ardyne Point is not feasible and transmission cabling which should be buried underground to avoid further visual impact by use of pylons.

Bute Community Council (response dated 24th October 2006) – Object to the development on the grounds of technological advance and efficiency of wind farm developments where other forms of renewable energy e.g. wave power could be less unsightly; particular site of Black Craig is inefficient in terms of prevailing winds where a more efficient site would be preferable away from areas of popular scenic appreciation; environmental effect is more than considerable – proposed height of turbines (at 300ft) would be a third of the hill's total height (1,000ft) which would be environmentally intrusive, threatening to wildlife, and significant effect on tourism; proliferation of agreed, proposed and future wind farms around the Clyde Estuary seen as a spoilation of our national heritage, the beauty of the landscape which will only benefit the developers. The Community Council wish to point out that they support all forms of renewable energy but there are serious concerns about the threatened proliferation of wind farm development in this part of the Clyde. Additionally any wind farms should be sited outwith areas of scenic beauty as enjoyed by residents and tourists alike.

Development Plans Unit (response dated 28th September 2006): Confirm that the Council decided to remove the Preferred Areas of Search for wind farms in the Cowal area. In addition there have been many representations on the renewable policies in the Local Plan generally, both at the Finalised Draft stage and Modifications. Accordingly, the Finalised Draft Local Plan should not be used as a material consideration in assessing this application where the Cowal Local Plan and existing Wind farm Policy should be used.

Inverclyde Council (response dated 24th October 2006): Comments regarding site selection, cumulative effect and visual impact. Site selection appears to have been compared only on potential sites owned by the applicant and not with sites from a wider search area and then ruling them in/out according to criteria of environmental and planning constraints. Cumulative effect should have included proposed scheme at Leapmoor Forest near Inverkip where an application has been submitted for the erection of 10 turbines, 125 metres to tip. Having said that Inverclyde Council consider that in visual terms from the photomontages and wire frames that the development would have a minor or at least moderate impact on the views from Inverclyde due to the distance from the viewpoints to the proposed development site and topography.

Historic Scotland (response dated 15th November 2006): Concern on potentially adverse impact on Castle Toward Designed Landscape and Ardgowan House Designed Landscape (north of Inverkip). Also consider that insufficient information is available and methodology of assessing cultural heritage resources and potential impact is questioned.

Forestry Commission Scotland (response dated 9th October 2006): Comments regarding ecology, deforestation and conversion to moorland, landscape and visual impact with particular reference to Kilmarnock Hill, fence line restoration and requirement to consult Deer Commission for Scotland.

West of Scotland Archaeology Service (response dated 3rd January 2007): No objections subject to conditions concerning implementation of a programme of archaeological works and safeguarding of site numbered HA8 (Bodach Bochd Cairn at Eilers Burn) in ES.

Scottish Executive Environment Group (response dated 26th October 2006): No comments to offer.

Transport Scotland - Trunk Road Network (response dated 6th October 2006): While the proposal represents an intensification of the use of the site, it is acknowledged that all turbine and construction materials will be delivered by sea to the southern harbour of Ardyne Point and then by road to the site. As the trunk road network will not be utilised, no objection to the scheme.

Area Roads Manager (response dated 7th December 2006): No objections subject to conditions regarding sightlines, access design, signage, off road car parking. Improvements to the C10 Glen Striven road will be subject of Roads Construction Consent and improvements to the access at Ardyne will require a separate planning application with Road Opening Permit for works within the road corridor.

Head of Protective Services: No response.

Scottish Water (response dated 4th October 2006): No objection, Scottish Water assets not affected;

Health and Safety Executive (response dated 23rd October 2006): Proposed development does not fall within the consultation distance of nearby licensed explosive facilities therefore no comment;

NATS Safeguarding (response dated 16th February 2007): While proposal is likely to impact on electronic infrastructure, no safeguarding objection is raised.

Defence Estates (response dated 4th October 2006): No objection on the basis that the number of turbines does not exceed 19 and do not exceed 102 metres to blade tip;

BAA (response dated 17th January 2007) : No objection, does not conflict with safeguarding criteria.

Highland and Island Airports Ltd. (response dated 6th October 2006): No safeguarding objection to the proposal;

The Crown Estate (response dated 25th September 2006): Crown Estate interests not affected by this development therefore no objection;

In addition to the consultees above, consultation packs were sent (by the applicant's agents) out to the following non-statutory consultees : Dunoon and Cowal Marketing Group, Isle of Bute Tourism and Marketing, Cowal

Archaeological and Historical Society, Ramblers Association(Scotland), Scottish Rights of Way and Access Society, Scottish Squirrel Group, VisitScotland, Association of Salmon Fisheries Board, Argyll Fisheries Trust, Rural Scotland, Scottish Association for Country Sports, National Grid Wireless, Colt, Thus, Hutchinson 3G, Scottish Executive (emergency services), Arqiva, Ofcom, Maritime and Coastguard Agency, Cable and Wireless UK, BT, Orange, Vodafone Ltd, T-Mobile UK, O2 (UK), Joint Radio Company, BBC.

Letters of objection from organisations are as follows:

Dunoon and Cowal Marketing Group (letter dated 1st October 2006) representing tourism interests and businesses throughout the Cowal peninsula and is closely affiliated to Visit Scotland. The letter of objection echoes points a) to g) below. In terms of visual impact, the 19 giant turbines would significantly transform the local hill character of steep ridges, hills and moors, which are themselves highly visible from all over the Firth of Clyde. Quality land and seascapes is the mainstay of tourism in the Cowal area. Many visitors come to this area precisely to 'escape' from industrial landscapes;

Some of the nearby wind farms have not been included in the cumulative impact assessment;

DCMG consider that the development of industrial wind farm development 5-miles from the boundary of the National Park is insufficient and this should be extended to 8-10 mile buffer zones around National Parks and National Scenic Areas. The world-famous Kyles of Bute and nearby Loch Striven would be significantly affected.

Isle of Bute Marketing Group (letter received 13th October 2006); **The Ramblers' Association** (letter dated 26th October 2006) and from **Visit Scotland** (letter dated 16th November 2006): Expressing concern raised by a number of local tourism businesses (refer to objections below). While support in principle for renewables serious concern about insensitive siting and high visual impact and affect on tourism where scenery is regarded as a main reason for visiting the area.

(iii) Publicity

The proposal has been advertised in the Dunoon Observer, The Buteman and The Edinburgh Gazette (publication date 29th September 2006) in terms of Regulation 13 of the Environmental Assessment (Scotland) Regulation 1999; and in the Dunoon Observer and The Buteman in terms of Section 34 'Bad Neighbour' (structures over 20 metres in height) (closing date 13th October 2006) and Article 18 (local plan potential departure to POL RUR1, RUR2, RUR4, RUR13, COM5, TOUR1, TOUR11, TOUR14, TOUR15, PU3, TR3, BE1, BE2, BE8, BE9, BE12) (closing date 20th October 2006)

Representations: A total of 151 representations have been received from individuals/households against the proposal, of which 112 are letters of objection with 39 letters of support. Of the former, 38 have been received from residents within the Bute area, 19 have been received from residents in Dunoon and South Cowal, with the remainder from other UK addresses.

Letters have been received from George Lyon MSP (dated 20th and 27th October 2006) which asks that special attention be given to his constituents' (Dr. H Reid and Mrs J Reid, letter dated 6th October 2006; Mrs. R. Chisholm, letter dated 7th October 2006; Wallace Fyfe, letters dated 9th and 1st October 2006; Elizabeth Rae, letter dated 5th October 2006; Mr. John Dunn, letter dated 7th October 2006; Alistair Mackenzie, letter dated 10th October 2006; Mrs. M. Harman, ;letter dated 7th October 2006).

The persons who have written letters of support (39) are listed in an appendix to this report. The grounds of support are summarised as follows

37 letters of support take the form of a standard letter which states *"Being a supporter of renewable energy, I am writing in support.....Cowal should make an adequate contribution to the Scottish Executive's and the UK's renewable energy targets and I believe that this wind farm will do this. It will also be a major financial asset to the area as a result of a community benefit fund being set up and also because of the fact that the wind farm will generate rates to the local Council".*

The persons who have raised objections (112) are listed in an appendix to this report. Approximately 62 of these letters take the form of a standard letter (main points a) to g) below) The various grounds of objection raised by both individuals and organisations may be summarised as follows:

a) Visual Impact

The giant industrial turbines would be highly visible over a wider area, in particular from the ferry routes to Cowal from Gourock and Wemyss Bay to Rothesay, from within the National Park at Ardbeg, Kilmun and Strone , from the nearby Bishop's Seat hills, Inverchaolain, Rothesay, Helensburgh, Largs, Skelmorlie and the coast roads A78 and A770. The presence of the turbines would significantly damage the high quality of the local natural landscapes and seascapes.

b) Cumulative Impact

With seven other industrial wind farms known to be proposed (including 4 in planning) around the Upper Firth of Clyde, the visual impact of an additional 19 giant turbines on Black Craig, itself over 500m above sea level would be insensitive and unacceptable.

c) Landscape Impact

The proposed wind farm would be highly visible from numerous points within the nearby Loch Lomond and Trossachs National Park – “a Special Place”. Dunoon’s status as the Maritime Gateway to the park would be undermined. The location for this development is only a few miles away from the world-famous Kyles of Bute, a National Scenic Area and would be highly visible and dominant from the approaches to the East Kyle.

d) Tourism

The development could significantly damage Dunoon and South Cowal’s tourism industry, which is dependent on the quality of its land and seascapes and the related heritage.

e) Reduced Property Values

Information from the Royal Institute of Chartered Surveyors shows that property values are likely to be undermined by the presence of a nearby wind farm.

f) Disruption

The main A815 coastal route, used by commuters and tourists is likely to be subject to serious disruption throughout the lengthy construction period.

g) Bird Strike

Golden eagles are known to nest near this site, and other protected species such as hen harriers and merlin are likely to be casualties if this wind farm is built.

h) Shadow Flicker

The movement of the giant rotors would often produce this strobe’ effect at various times, which would be seen from afar and wide over the Firth of Clyde.

i) Environmental Statement Shortcomings

Cumulative impact has not been adequately assessed in this document which omits mention of some nearby wind farm plans (e.g. Leapmoor Forest near Inverkip). Potential pollution to some local rivers and the effect on fish stocks is of concern.

j) Cost/Benefit

Although this development would have a huge visual impact of the Upper Firth, it will only make a minuscule contribution to national power requirements and have no measurable effects on reducing carbon dioxide emissions or global warming.

Below is a summary of further objections and concerns raised:

- *The Cowal hills including the Black Craig ridge running up to the Bishop’s Seat are clearly visible from most of the settlements on the Clyde Coast and Bute. Siting these high industrial structures on top of these hills will ruin the natural beauty;*
- *The scale of the development is inappropriate to the landscape in that the height of the turbines at over 100 metres is 25% the height of the hills which are around 400 metres. It would have an unacceptable visual impact to the detriment of landscape character and quality.*
- *Very serious concerns from a number of residents in Bute that the proposed development would have devastating effects on tourism, local businesses and the economy generally where the magnificent views of the Cowal hills from Rothesay including Port Bannatyne to Ascog would be lost as a result of this potential environmental catastrophe;*
- *The highly visible nature of this site will adversely affect tourist routes both by land and sea and will impact greatly on views of Cowal from the Isle of Bute and the Colintraive peninsula. The site would be prominent from the Wemyss Bay to Bute Ferry and form the Gourock crossings.*
- *In an area of landscape driven tourism, inappropriately sited wind farm developments should be resisted. A significant number of objectors from outside Argyll have indicated that they would not consider visiting the area if it was subject to inappropriately sited wind power developments.*

- *The Planning Committee should consider the total number of turbines and total impact on the Isle of Bute which depends on tourism for a large part of its economy;*
- *Will Argyll and Bute Council accept responsibility for the financial loss in value of properties on Bute?;*
- *The proposal would contribute to the cumulative impact of wind farm sites in South Cowal (one operational, one application imminent and another at scoping stage as well as others in Inverclyde). Argyll has already reached saturation with wind farm development. Development of the site will contribute to cumulative impact upon the Kyles of Bute National Scenic Area and approaches.*
- *Number of wind farms already (and proposed) in Argyll and Bute;*
- *Expected output of an average wind farm is regularly as low as 5% of the advertised rating and will seldom rise above 40% even in ideal conditions;*
- *Not against the use of renewables including wind power generally but wish to see alternative forms e.g. hydro, wave power, bio mass in more sensitive locations;*
- *Wind farm schemes may be better located in less contentious areas e.g. 190 turbines at Eaglesham Moor only attracted 40 objections;*
- *Any distribution of money or benefits to local agencies or communities would be far outweighed by the loss of natural resources;*
- *Drive towards wind energy is not because the landowners have become eco-friendly, or care about the environment, but because of the income it brings in. Profiteering by landowners on the Governments failure to support alternative energy sources.*
- *The development could have a potentially damaging impact on golden eagle and black grouse. The developers are unable to prove conclusively that these protected species will not be threatened by their proposal.*
- *Potential conflict of interest on the survival of raptors on the wind farm site within an estate used extensively to breed birds for commercial shooting.*
- *Believe that the potential impact that construction will have on golden eagle is understated. Investigation into this and other species i.e. osprey and peregrine should be “real” and not “assumed”;*
- *In view of its adverse consequences for landscape quality and nature conservation interests, the proposal would conflict with development plan policy and national planning guidance and should therefore be resisted.*
- *Additional development would lead to a consequent need to reinforce the grid system, which is already near capacity, thereby bringing the unwelcome prospect of further pylon lines. Reinforcement of the grid system will also only be countenanced by the National Grid where a cluster of prospective developments makes investment worthwhile. A small scheme such as this would be unlikely to go ahead unless other schemes can share costs. A consent in this location would therefore act as an incentive to attract other prospective developers to this area.*
- *Given the relative small scale of this site, its contribution to the reduction in global CO₂ emissions would be negligible. The proposal would contribute a unpredictable and intermittent contribution towards energy requirements in which Scotland is already self-sufficient, in disregard of UK and international wildlife conservation laws.*
- *Any suggested economic benefits associated with the proposal are illusory given that the market in renewably generated electricity is artificially supported at public expense.*
- *Concerns regarding TV reception in Rothesay which relies on a signal bounced from Toward;*
- *Proposed site is outwith areas identified for wind farms*

- *The Environmental Statement is inadequate in its assessment of noise to nearby properties, shadow flicker, soil and peat stability, and drainage issues, and in particular, run off from the site could exacerbate local risk of flooding.*
- *The development will contribute to environmental noise to the detriment of the quality of life of nearby residents.*
- *Any compensation which might be offered to the local community would be entirely inadequate compared to the detrimental impacts on residents, businesses and visitors. Likewise any potential short-term benefit to Campbeltown from turbine manufacturing (i.e. Vestas) should not be a consideration which weighs in favour of development in an inappropriate location.*

C. ASSESSMENT

(i) Renewable Energy Policy

In considering this proposal, in addition to having regard to local environmental issues, it is necessary to have regard to those macro-environmental factors which are material considerations in assessing the acceptability of renewable energy developments. UK energy policy has its most up to date expression in the Energy White Paper 2003, which sets a long term goal of reducing UK CO₂ emissions by 60% by 2050, in order to address global warming and climate change. In Scotland, SPP6 now confirms that Scottish Ministers have set a target of generating 40% (6GW) of Scotland's electricity from renewable sources by 2020. The current application proposal would have an installed capacity of 38 MW, which the applicants estimate would have an average output sufficient to meet the electricity needs of approximately 21,247 homes over its design life of 25 years.

In terms of planning policy, SPP6 advises that 'Support for renewable energy developments and the need to protect and enhance Scotland's natural and historic environment must be regarded as compatible goals if an effective response is to be made to the challenges of sustainable development and climate change.' (para 8)

In terms of Development Plan policy, the adopted Cowal Local Plan was produced in advance of the development of commercial wind farms, and therefore it does not have policies relating specifically to them. It does, however, through policies RUR 1 and RUR 2, exert influence over developments which would have undesirable effects on scenic areas, including the Kyles of Bute National Scenic Area, Bute and South Cowal Regional Scenic Area, the Isle of Bute Regional Scenic Area, and nature conservation interests, particularly in the case of protected bird species.

The approved Structure Plan, through Policy STRAT RE 1, reflects government policy in expressing support for the development of wind farms provided that they do not have adverse consequences for landscape assets, the historic environment, nature conservation interests, local communities or telecommunications installations. In addition to statutory policy, the Council's 1995 'Wind Farm Policy' still remains relevant, and may be considered in conjunction with the more recently adopted structure plan policies.

The Structure Plan indicates that, through the local plan process, the Council will seek to identify specific areas of search for future wind power developments. Whilst the Modified Finalised Draft of the 'Argyll and Bute Local Plan' introduces sensitive areas for wind farms which are defined spatially, representations lodged in respect of the wind farm policies of the plan mean that they can only be accorded limited weight in the determination of this application, as the policies will require to be reviewed at the forthcoming public local inquiry into the Plan, and may therefore be subject to change.

(ii) The Proposal

The application relates to an upland area of between 400 to 522m AOD, comprising open moorland on a rising broad ridge, west of the forested steep flanks of Glen Fyne, some 5 km south west of the major settlement of Dunoon, 7km north east of Port Bannantyne, and 2km from Loch Striven. The application site lies wholly within the Bute and South Cowal Regional Scenic Areas as identified in the Cowal Local Plan within an Area of Panoramic Quality, as identified in the Argyll and Bute Modified Finalised Draft Local Plan. The wind farm site with its high and prominent location on the crest of this broad ridge would also have an immediate visual impact on parts of the Kyles of Bute National Scenic Area, adjacent Areas of Panoramic Quality, the Firth of Clyde, Loch Lomond and the Trossachs National Authority and Inverclyde and North Ayrshire Councils.

The applicant's agent suggests that the development cost is in the region of £35M with an expected site start during January 2008 and completion by January 2009. The development is expected to result in 2 full time staff being employed.

- *Turbines*

The proposal involves the development of a wind farm involving the erection of 19 No. wind turbines, each with a capacity of up to 2.5MW. The turbine structures comprise a 60-metre tubular steel tower with nacelle and hub atop, with three blades with a rotor diameter of 83 metres. This would result in a maximum height of 101.5 metres from ground level to blade tip height. The finish and colour of the turbines and blades are likely to be semi matt and pale grey.

The 19 turbines would be located in roughly two parallel lines from the lower slope of Blar Buidhe in the south at approximately 400m AOD following the broad ridge running north-east at the northern slopes of Black Craig at 522m AOD.

Each turbine would be sited in concrete foundations (approx 20 x 20 metres each with temporary crane hardstandings of 15 x 45 adjacent), but the specifications may change once ground conditions have been confirmed.

In terms of operation, blades will rotate at approximately 6-22 revolutions per minute generating power for all wind speeds between 9-56mph. When operating at wind speeds above 34mph the blades will be feathered to regulate output. At wind speeds greater than 56mph the turbines will shut down for self-protection. The Environmental Statement suggests that these latter wind conditions usually only occur for about 1% per year in this area.

Each turbine requires a transformer which can either be located within the turbine tower or outside depending on the type of turbine to be installed. The agents comment that it is Argyll Wind farms intention to source turbines with transformers inside, if possible and if so would require external steps and handrails for maintenance. If outside, they would be located adjacent to the base of the turbine in housing approx 2 x 2 x 2 metres and coloured either green or the same colour as the turbines. The transformers will increase the electrical voltage to 33kv where buried cables (approx. 5.9km) would connect the turbines to the substation.

The grid connection is not covered by this application. It is anticipated that it will involve underground cabling to a grid substation at Sandbank. A separate application will be lodged separately by the local grid operator as required.

- *Substation*

The scheme will require the erection of a permanent on-site substation and this will be located beside Turbine No. 17 at the northern extremity of the site and at a height of 485m AOD on the steep slopes overlooking Inverchaolain Glen. The switchroom/sub-station (25 x 5 x 6 metres) would have cement rendered walls and slated pitch roof with septic tank and located within a hardstanding compound approx. 40 x 20 m.

- *Anemometers (wind monitoring masts)*

There are currently two temporary 60 metre high anemometer masts on the ridge. The proposal involves the erection of one permanent lattice wind anemometer mast (60 metres high) and associated concrete foundations, and this would be located west of Turbine No. 11 at 460m AOD. In addition, two temporary anemometer masts will also be required (no details submitted at this stage).

- *Access to Site*

It is proposed to deliver all turbine components (tower sections, blades, hubs, nacelle units) and all other construction materials by sea to the southern harbour at Ardyne Point. From there they will be transported along the private access track onto the public unclassified C10 road to the site entrance at the northern end of the Gortansaig Farm road. Upgrading and improvements are proposed to the unclassified public C10 road which will involve:

- widening of the junction where the private Ardyne access track meets the C10;
- general site clearance of overhanging verges/trees along the C10 to allow for vehicles up to 5m in height;
- widening of two bends to allow for swept path of the vehicles;
- potential temporary strengthening work of bridge crossing Ardyne Burn;
- upgrading of site access junction which may require existing stone wall to be temporarily removed.

- *On-site access*

Approximately 1.8 km of existing track from the site entrance to borrow pits 2 and 3 at Corriebeg Wood will be used where an additional 2.6km of new track will be constructed around the south eastern slope of Kilmarnock Hill to access the wind farm area. Approximately 6.9km of new tracks would be required to connect the turbines.

- *Borrow Pits*

Stone for track and turbine base construction will be excavated from 10 No. borrow pits with estimated extraction of 50,000m³ of material. Four of the borrow pits are existing quarries and have been used in the past for the extraction of stone. While six of these borrow pits are located along existing tracks in Glen Fyne, Kilmarnock Wood and at the site entrance, four would be located on the summit ridge. Only limited information and estimated extraction figures have been submitted at this stage. The borrow pits will however require to be the subject of separate mineral consent applications.

- *Temporary Construction Compound*

Two temporary construction compounds (100 x 50 metres and 30 x 20 metres) will be required where the main site would be located at the site entrance and the other at 400m AOD at the southern extremity of the wind farm site.

A concrete batching plant will be located close to the site entrance where it is proposed to source sand and gravel aggregate from nearby Killellan Farm.

(iii) The Environmental Statement

The application is accompanied by an Environmental Statement and Non-Technical Summary dated September 2006, which was the subject of 'scoping' with the Council and consultees prior to preparation, in order to ensure that all relevant issues were examined as part of the application process. The purpose of the Environmental Statement is to identify any significant effects on the environment arising from the development proposed, to assess the magnitude of those effects, and the extent to which they can be avoided or mitigated as part of the design and implementation process.

In terms of site selection, two alternative site locations were considered early in the process but these were restricted to locations within the Glenstriven Estate. The locations were on a very prominent southerly ridge of Cruach nan Capull and areas south of the Bishop's Seat. The alternatives were discounted for reasons including areas of deep peat, steep slopes affecting wind turbulence, potential for greater landscape and visual impacts, difficulties with access due to steep topography and need to cross numerous watercourses.

The key issues arising from the environmental statement are summarised in sections a) to j) below compared with responses from consultees and public representations and concluding with the department's views.

a) Landscape and visual considerations

The Environmental Statement comments that the proposal involves the development of the Black Craig ridge within Glenstriven Estate, which is situated within an area of 'open moorland ridge within remote rural upland landscape', at around 400-540 metres above sea level. The site lies 2 km from Loch Striven and the eastern approaches to the Kyles of Bute. The closest main settlement is Dunoon 5km to the north-west with Rothesay and Port Bannantyne some 8km to the south. There are no properties within the wind farm site. The closest residences are situated at Inverchaolain Farm (1200m), Gortanansaig Farm and around Knockdow, all within 1 km of the site. The site itself is not within any designated scenic area, although the development, in view of its scale, it would have an influence over a number of such areas within 35 km – namely four National Scenic Areas (Kyles of Bute, Loch Lomond, North Arran and Knapdale), four Regional Scenic Areas (South Cowal, North Argyll, Loch Lomond and Knapdale), four Regional Scenic Coasts (Loch Long, Loch Goil, and East and West Loch Fyne) and a number of designated historic gardens and designed landscapes.

A landscape and visual assessment has been carried out over a 35 km radius, with 27 representative viewpoints being addressed by means of wireframe diagrams and photomontages to illustrate the likely impact of the development. The Environmental Statement concludes that during construction of the wind farm, there will be significant visual impacts on the development site itself, where there would be significant visual impact from eight viewpoint locations. During operation, visual impacts of major significance are predicted from 12 viewpoints (5 major and 7 moderate) with minor or negligible impacts predicted for the remainder. Significant visual impacts are also identified for Rothesay and Port Bannantyne and from the A886 on the Island of Bute.

From the scenic designations noted above it is predicted that the wind farm will have no significant impact on the character of any of these landscapes. In addition, no significant impacts are predicted on the Loch Lomond and Trossachs National Park or the Clyde Muirshiel Regional Park. While The Environmental Statement identifies that there will be a major impact on the character of the site itself during construction and operation (due to the transition from a undeveloped moorland landscape to a developed energy-generating site with tall structures (major significance)), it is concluded that there will not be a significant impact on the wider 'landscape character types' within which the wind farm site falls. Furthermore, the impact on the landscape character of the surrounding landscape is also judged not to be of significance.

Consultees/Representations

Based on their own landscape and visual assessment Scottish Natural Heritage disagree with the findings of the ES and conclude that the development is likely to have significant adverse impacts and major alteration of key baseline characteristics on the landscape character of the Steep Ridgeland and Mountains Landscape Character Types (LCT); the visual resource of 12 specific viewpoints including locations close to the site and a number of locations across the Sound of Bute and Firth of Clyde; the visual resource of the settlements of Port Bannantyne/Rothesay and Gourock and the sequential visual experience on the A886 and the Wemyss Bay to Rothesay ferry route, where the wind farm site is presently seen in a highland or coastal context that is relatively unmodified by built development .

On the basis that the development could have potentially serious adverse impacts on the landscape and visual interests within a LCT with “high to very high” sensitivity to wind farm development, SNH has objected to the proposal.

Given the department’s comments which are supported by the specialist landscape advice provided by SNH, this point of view should be accepted and the development resisted on landscape and visual grounds, with particular emphasis being given specifically to the impact of the development on the Isle of Bute. Similarly, many objectors contend that the Environmental Statement significantly underplays the significance of the wind farm development on the Clyde coast, the Kyles of Bute, Glen Striven and on the Isle of Bute, and ignores the effects upon ferry travellers on various Clyde crossings. Dunoon and Cowal Marketing Group comment that there are no views or wire frames included from Greenock Lyle Hill, Loch Eck, Puck’s Glen, Cruach nan Capull, Kilbride Hill and the Bishop’s Seat. A local resident from Rothesay comments that the site would have a serious detrimental visual impact on a famous and popular view from Canada Hill where a wide panorama of unspoilt scenery would be ruined.

South Cowal Community Council comments that there is no firm commitment that all necessary cabling would be underground where the use of pylons should be avoided in respect of impact on visual amenity and landscape.

The Department’s View

The applicant’s agents discussed and agreed 27 viewpoint locations to be included as photomontage or wireframe images within a 35km radius. Whilst the original number of viewpoints was reduced, the choice to produce these locations as photomontages or wireframes has resulted in insufficient information to assess fully the visual impact on a number of sensitive locations. Viewpoint locations close to the site result in distorted views whereas on moving further away from the site the full visual impact becomes more apparent. Areas which would be most affected with maximum number of turbines visible include Inverchaolain Glen, west Loch Striven, Port Bannantyne, Rothesay and Inverclyde coast with less turbines visible from sites on higher ground or sites further away.

Images taken from within Inverchaolain Glen do not provide an accurate context of the same impact when viewed from Strone Point, Colintrave or from Port Bannantyne and Rothesay. Viewpoint 2 from Bealach na Sreine provides a more accurate impression of the turbines when viewed from the col which separates Glen Kin from Inverchaolain Glen. A series of images from within these glens may have provided a more accurate impression. The view from Strone Point should have been submitted as a photomontage in addition to a wireframe image. That said, the department concurs with the findings of the ES that the visual impact from Inverchaolain, Bealach na Sreine and Strone Point will be major.

Similarly the view from Craigendive at the head of Loch Striven would have been better represented as a photomontage in addition to the wireframe image as many of the turbines would be prominent when viewed from the B836 Dunoon to Glendaruel road. The department considers that the visual impact on Craigendive and areas at the head of Loch Striven would not be negligible but minor or moderate.

Since Rothesay and Port Bannantyne are the most populated areas to experience high visual impact from the proposed development, a number of key viewpoints from popular locations were suggested to the agents. These have not been submitted where specifically, a very poor viewpoint from Canada Hill does not represent the full impact that the scheme would have. Other viewpoints from within the built-up areas of Rothesay and Dunoon have not been submitted which could have shown the full visual impact of the scheme on populated areas and sensitive/historic locations. The wide angle viewpoints from Rothesay Bay and Kames Bay do not provide an accurate impression of the entire wind farm development where all turbines would be visible from many lower and higher level locations. The views from Bute merely emphasise the high visual impact that the wind farm would have where from certain locations the turbines appear as dense clusters and not as a carefully designed group. The department would disagree with the findings of the ES that visual impact from Canada Hill (minor), Rothesay (moderate) and Port Bannantyne (moderate) as it is considered that the impact on a number of different locations within these populated areas would be major.

One of the key viewpoints of the windfarm on the South Cowal peninsula will be from the Toward areas in particular from Toward Quay and Ardyne Point towards Knockdow. While this area is at present sparsely populated, the public C10 road runs through this open agricultural area towards east Loch Striven. Within the Argyll and Bute Modified Finalised Draft Local Plan, potential development areas have been identified at Castle Toward (PDA 2/42), Ardyne (PDA 2/43) and Knockdow (PDA 2/44) for mainly mixed use developments comprising tourism, marina, leisure and housing developments. The department agrees with the findings of the ES that visual impact on this area will be major.

While no views have been submitted from the Bishop's Seat or Kilbride Hill (both popular walking peaks), a view has been submitted from Buachailean from the south. Whilst this hill and recreational viewpoint is at a height of 346 metres and across Glen Fyne from the application site, it does provide a very accurate impression of the surrounding landform and topography and visual prominence of the high Black Craig ridge with no suitable higher backdrop. Given height and proximity it is no surprise that visual impact on this area will be major.

Viewpoint 5 from Castle Hill in Dunoon appears to be contradicted by Viewpoints 9 and 13 where it would appear that more than one part of a blade tip would be visible from many parts of Dunoon, Kirn and Hunter's Quay. Whilst the ES finds that impact on Dunoon Castle will be negligible, it is considered that many other parts of the town could have moderate or major visual impact.

Views from the north from Kilmun Arboretum are also similarly poor representations from important leisure and recreational routes where many of the turbines would be visible overlooking Glen Kin. The department would however concur with the findings of the ES that visual impact will be moderate.

Views from the Firth of Clyde and Inverclyde appear understated in terms of overall visual impact. The submitted views do not accurately reflect the full impact that the wind farm development would have on Clyde ferry crossings or sailing craft. The department would however concur with the findings of the ES that visual impact will be moderate.

b) Cumulative impact

The Environmental Statement has also considered cumulative impacts upon other wind farm sites within a 30km radius from Black Craig. The findings conclude that:

- *multiple wind farms will be visible from the open sea, particularly the Firth of Clyde and Sound of Bute;*
- *high tops tend to have more wind farms visible;*
- *the western coast of the Firth of Clyde (i.e. Innellan, Bullwood) has limited views of Black Craig but views across to the wind farms on the east side (Inverclyde Council) where this will also be reversed when viewed from that side;*
- *locations on Bute, Rosneath and the Corlarach Hill ridge have views to both Black Craig and to developments on the Clyde Muirshiel hills.*

The Environment Statement concludes that although most of the locations/routes assessed will have a view of more than one wind farm, the cumulative visual impacts for all but one (from Buachailean, one of the nearest hill tops) of the locations/routes assessed was judged to be of minor to negligible significance. No significant cumulative impacts were identified for landscape character.

Consultees/Representations

Scottish Natural Heritage do not share the view of the ES and consider that the proposal would have potentially significant additional cumulative landscape and visual impacts which are inadequately addressed within the ES at present because it does not include an assessment of all cumulative impacts, nor of the impacts on all relevant landscape character types. The ES states that the proposals at scoping stage are excluded from the assessment. This is in conflict with earlier requests from SNH for a cumulative assessment of all public domain proposals, including the adjacent Corlarach Hill and Eilligan wind farm proposals, and the Leapmoor scheme in Inverclyde that has been in the planning system for several months that have all been excluded from the ES. It is also suggested that the included angle for the cumulative wireframes is insufficient to illustrate all the additional wind farms visible. SNH consider that the ES presents insufficient information to enable a full assessment to be made of all cumulative landscape and visual impacts and object to this particular aspect of the application until stated information is submitted.

Many objectors (including Dunoon and Cowal Marketing Group, Community Councils and other objectors) state that the cumulative impact assessment does not include several proposed wind farm schemes including Leapmoor Forest near Inverkip, Corlick Hill near Kilmacolm, Allt Dearg, North Kintyre, An Suidhe as well as on Corlarach Hill and Eilligan on The Bishop's Seat. Many objectors consider that cumulative effects have been underestimated, particularly the impact upon longer distance views from Isle of Bute, Loch Lomond and

Trossachs National Park, Inverclyde, North Ayrshire and ferry routes where more than one wind farm will be visible. In particular, it is their view that the Firth of Clyde corridor would become characterised by a series of wind farm sites. It is also suggested that views of the proposed site along with the proposed scheme at Corlarach Hill and possibly Eilligan on north of the Bishop's Seat, would create a cluster of turbines that would impact cumulatively upon many settlements and popular road and ferry routes, where their presence would be significant.

The Department's View

None of the photomontage or wireframe images include any other wind farm developments to fully assess cumulative impact. The inclusion of the Corlarach wind farm scheme across Glen Fyne (details submitted at scoping stage and application imminent) and other schemes in Inverclyde would have been beneficial to assess the capacity of these low lying but prominent hills for wind farm development given their proximity to many established and populated areas and historic and areas of panoramic quality.

c) Ecology

Ecological surveys were undertaken to assess impacts on habitats and animal species. The site itself is not covered by any statutory or non-statutory nature conservation designations. A number of Ancient Woodland Inventory sites are located between the boundary of the site and Loch Striven and along the access track to the south of the site. The site comprises a mixture of upland moorland vegetation types which are common in Scotland. The layout of the site has been designed to avoid areas of better botanical habitat and to minimise disturbance to peat hydrology. The site is not to be considered of special value to either invertebrates, mammals or other fauna, although evidence of otter activity has been identified. Red squirrels were sighted within the site boundary, confined to a coup of coniferous woodland, where an access track has been diverted. A Habitat Management Plan seeking to deliver specific nature conservation benefits and an Ecological Clerk of Works are proposed. The development is most likely to give rise to impacts during the construction phase, although subject to recommended mitigation measures (pollution control and vegetation reinstatement for instance) the residual impacts are considered by the applicants to be low.

Consultees/Representations

Argyll and Bute Local Biodiversity Partnership comment that insufficient information concerning red squirrel which have been identified on and near the site have been adequately considered. These views are echoed by South Cowal Community Council who consider that insufficient time and information has been spent on ecological surveys.

The Department's View

The ES contains information and mitigation measures for flora and fauna. SNH have not objected to the proposal on this aspect and further information requested regarding red squirrels and other species could be addressed by planning conditions or within a Habitat Management Plan.

d) Ornithology

An assessment on predicted impacts of the proposed wind farm on birds was undertaken over a two year period. Findings include breeding hen harriers, skylark, red grouse, snipe, ravens, song thrush and crossbill, with infrequent visitors including merlins, peregrine, osprey and short-eared owl. Small populations of black grouse occupy two areas adjacent to the proposed wind farm. A pair of golden eagles nest more than 5km from the proposed wind farm where surveys suggest that there is golden eagle activity over the site in the non-breeding period. It is suggested that the levels of sightings are distorted by the deliberate provision of large amounts of carrion within the site for Estate management purposes. In the absence of this carrion, eagle activity is likely to be much reduced. Further survey work is proposed.

The Environmental Statement concludes that during construction activities, noise and visual disturbance will temporarily displace some breeding and foraging birds and disrupt the routines of others. This impact is considered to be of minor significance for all species. The effect of habitat loss are considered to be of negligible significance, given the small, area affected. Potential collision risk is not predicted to be an impact of significance for any species, with the exception of the golden eagle.

Consultees/Representations

SNH state that the Black Craig application area is known to support golden eagle (listed on Annex 1 of the European Birds Directive 1979 and an Argyll and Bute LBAP species) and black grouse (listed on Annex 2 of the European Birds Directive 1979 a UK BAP and Argyll and Bute LBAP species).

Golden eagle is afforded special protection under Schedule 1 of the Wildlife and Countryside Act 1981 (as amended). They are also listed under Annex 1 of the European Birds Directive 1979, and as such they are a material consideration in the determination of a planning application.

SNH disagrees with the conclusion of the ES that impacts on golden eagle would not be significant and object on this basis. SNH consider that the current pattern of intense flight activity within the development footprint could have a significant impact upon the golden eagle territory in this area. While it is indicated that further studies are to be undertaken during winter 2006/07 this must include collision risk modelling scenarios and full details of the proposed mitigation package highlighted within the ES.

SNH also note that black grouse could be affected by the proposed development where further surveys will be required for the proposed development and grid connection works in order to establish a habitat management plan and mitigation measures to ensure that the serious and continuous decline of Scottish black grouse population is not accelerated.

The site is also frequented by other bird species including peregrine, hen harrier and merlin but SNH are content that the impacts on these species will be low. Suggestions made to create a 200 metre exclusion zone to avoid disturbance to any of these bird species during breeding season.

Argyll and Bute Local Biodiversity Partnership highlights species of local and national concern which have been identified on and near the site where their protection and monitoring requires further input into a Habitat Management Plan. RSPB object on the basis that there is insufficient information in the ES to fully assess collision risk for golden eagle including flight activity details. Concern is also raised about the cumulative impact of wind farm schemes on golden eagles through habitat loss within mainland Argyll.

The Department's View

Collision risk is only assumed at this stage while the ES confirms that further studies are required to establish the extent to which birds are able to avoid collision with wind turbines. It is suggested that indications from studies so far are that collisions are rare events and occur mainly at sites where there are unusual concentrations of birds and turbines, or where the behaviour of the birds concerned leads to high-risk situations. Examples include migration flyways, situations where large numbers of birds may be flying at night or in poor visibility and areas where the food resource, and therefore level of bird activity, is exceptional.

However, as no further details have been submitted these presumptions cannot be accepted as a reliable mechanism for the prediction of mortality levels. As there is no guarantee that this will necessarily be the case, and there is room for error in one or more of these areas, the precautionary stance taken by the RSPB and Scottish Natural Heritage is understandable.

The onerous requirement to maintain the integrity of European protected sites and to avoid attrition of protected species is such that development ought not to be permitted unless there is reasonable certainty that qualifying interests will not be prejudiced as a consequence. The applicants have not ably demonstrated that there would be no risks to existing birdlife on and near the wind farm site or associated with significant construction and infrastructure works. Clearly, the only entirely safe course of action is to invoke the precautionary principle and not to permit wind farms in areas frequented by protected birds forming part of a vulnerable population. In that event, it may be concluded that this area of undeveloped moorland in its coastal location is fundamentally inappropriate to wind farm development, which would be better located elsewhere, in circumstances where considerations relating to European protected species do not assume the level of importance that they do in this case.

e) Hydrology and Hydrogeology

The site is located within the headwaters of three main river catchments, Inverchaolain Burn, Ardyne Burn and Knockdhu Burn. There are no public water supplies in the area and local properties rely on private water supplies from springs or streams. The construction period (and decommissioning) is most likely to give rise to implications for the water environment, particularly in connection with the formation of access tracks and turbine bases. However, no significant consequences for water resources are identified, subject to prudent construction practice and appropriate mitigation measures being employed, as identified in the Environmental Statement.

Consultees/Representations

SEPA object to the development on the basis that the proposal includes the culverting of five watercourses and extending existing culverts where insufficient information has been submitted. This information was requested at the scoping stage, where the ES should have identified all water crossings and include a systematic table of watercourse crossings or channelising with a detailed justification and design to minimise impact. This has not

been included in the ES where SEPA will uphold their objection until such information is submitted, demonstrating that the choice of watercourse crossing is the best environmental option. Culverting is considered to be the least desired option as they are a frequent cause of local flooding due to inadequate design or maintenance.

The proposal also involves water abstraction as part of the concrete batching plant proposal, which may also require CAR authorisation from SEPA. In terms of water abstraction, SEPA has had experiences where developers have assumed they'd be able to obtain a water supply but then it has turned out that there is no suitable water supply locally. However in these instances I believe it may be possible for developers to tanker in water. So again we'd expect them to supply information demonstrating where they are obtaining the water supply from or stating if they cannot obtain a source locally they would tanker water in.

In terms of flooding SEPA expect the developer to demonstrate that the designs chosen minimise the risk of flooding and can cope with expected flows with full details submitted on flow rates. While SEPA have objected due to a lack of information the flooding aspect could be addressed by conditions. On the basis of insufficient information including source of water and potential abstraction rates and volumes, SEPA object to this aspect.

The Department's View

The construction period (and decommissioning) is most likely to give rise to implications for the water environment, particularly in connection with the formation of access tracks and turbine bases.

While the access appears to have been designed with minimal watercourse crossings (in consultation with SEPA regarding appropriately designed crossing solutions) SEPA still request further information on watercourse crossings and water abstraction where it needs to be fully demonstrated that there is suitable access (with minimal and appropriately designed watercourse crossings) to the site and a suitable water supply can be obtained for the concrete batching.

f) Cultural Heritage

The Environmental Statement includes impacts on features of national importance within 5km and of exceptional sensitivity within 35km of the site boundary. There are no features of national or regional importance, or with formal cultural heritage designations within the site boundary. Only one site of cultural heritage interest, a shepherd's cairn known as 'Bodach Bochd' and a ruinous stone dyke was also identified on Kilmarnock Hill. Direct impacts on the cairn will be avoided. A short fragment of the stone dyke will be affected by the construction of the access track. There are 18 sites of national importance within 5km of the wind farm where impacts on seven within the zone of theoretical visibility are judged to be negligible. Consequences for archaeology within the site itself are considered to be of low magnitude.

No impacts during construction or operation are considered to be of greater than negligible significance on any of the heritage sites or features.

Consultees/Representations

While Historic Scotland is unable to comment on the proposal due to insufficient information, concern is raised on the potentially adverse impact of the development on the setting of Castle Toward Designed Landscape (Candidate Inventory Site) and Ardgowan House Designed Landscape. It is considered that the ES has not adequately assessed potential impact on cultural heritage features. Significant concerns are raised about the methodology used to assess impact on the historic environment. While the ES concludes that impact is not significant, Historic Scotland cannot place confidence in this conclusion given criticisms of the methodology employed. Further information is requested regarding the B-Listed Castle Toward and its Designed Landscape including views from the sea, and from Ardgowan House and Designed Landscape.

While West of Scotland Archaeology Service (WoSAS) are satisfied with the methodology and findings, an archaeological safeguarding condition is recommended in respect of mitigation for construction compound and borrow pit areas and specific safeguarding of site HA8 (Bodach Bochd Cairn) at the Ellers Burn during construction activities.

WoSAS however disagree with the findings of the ES that there would only be a negligible impact on two non-scheduled significant archaeological sites at Ardmaleish Point, Bute (site HA17) and a dun at Ardyne Point (site HA18), where these should have been assessed as moderate.

The Department's View

The viewpoint from Ardgowan has been taken from the coastal edge and not from within the grounds of Ardgowan House. Similarly there are no views taken from the grounds or including Knockdow House a Category B-Listed Building or within Castle Toward Designed Landscape.

Whilst the proposed turbines will be visible from a number of designated sites (and this visibility, however distant, may well impinge upon visitors' enjoyment of these historic sites), neither Historic Scotland nor West of Scotland

Archaeology consider that the development impinges on the setting of any of the designated sites to such a degree as to warrant objection being raised.

g) Noise and safety

Baseline noise levels have been recorded at the nearest dwellings to the site at Brackley Cottage and Inverchaolain at 1700 metres distant and at eleven other locations. The assessment has been carried out by comparing the predicted levels with the noise limits recommended in Planning Advice Note 45 which are derived from DTI/ETSU guidance on The Assessment and Rating of Noise from Wind farms (ETSU-R-97). This concludes that predicted levels meet both the night time noise limit and the lower amenity hours noise limits in all circumstances. Higher noise levels were attributed to the presence of a nearby watercourse.

Consultees/Representations

Subject to conditions, SEPA are satisfied with the submitted information regarding pollution prevention, winter working, foul drainage in respect of welfare facilities for site compounds and substation, protection of surrounding private water supplies, concrete batching mitigation measures, fuel storage area, substation bunding and oil storage and waste management licensing.

In terms of peat, SEPA comment that while a peat survey was undertaken in the north of the site, a peat depth survey has not been undertaken for the entire site. This should include Peat Slide Hazard and Risk Assessment for the entire site where peat stability should be fully investigated.

The Department's View

In terms of peat slide hazards SEPA's concerns are the potential pollution/environmental impacts created if a peat slide occurs. The applicant needs to demonstrate that there is no risk of peat slide. If no risk in peat stability SEPA may be satisfied in a planning context.

h) Access and traffic

Due to size of turbine components, a number of delivery and transportation options were explored. It is proposed that all turbine components will be delivered by sea to the southern harbour at Ardyne Point and then by road (private and public) to the site. No construction vehicles, with the exception of site personnel, will use the A815 from Dunoon. This is estimated at an average of 21 two-way vehicle movements of cars or mini buses per day from Dunoon over the 12 month construction period. Also estimated that there would be an average of 4 HGV two-way journeys from nearby Killellan Farm where sand and gravel would be sourced. Improvements are proposed and these have been summarised already. A Construction Traffic Management Plan will be agreed with the Council including transportation surveys, road maintenance and improvement and mud/debris on roads. Operational traffic is expected to be insignificant.

Consultees/Representations

The Area Roads and Amenity Services Manager is satisfied with the access arrangements proposed, subject to a minor upgrading of the junction with the A83. There are no road safety issues and the proposal is consistent with Structure Plan and Roads Policy. The ES is indefinite about eventual transportation and delivery routes to the site.

South Cowal Community Council expresses concern regarding potential impact of the proposed development upon traffic levels and related noise, road safety and pollution during the construction period.

The Department's View

The entire proposal is based on the fact that all turbines and components would be delivered by sea which would relieve pressures on the existing roads network. Access matters and off-site highway improvements could be covered by specific recommended conditions or Section 75 Agreements.

i) Tourism and Socio-Economic Effects

The Environmental Statement considers that no significant impacts on the existing estate activities are predicted. In terms of employment, it is estimated that the number of people employed on site during the 12-month construction period could vary from 15-70, with a small amount of spin-offs to local businesses/contractors. The construction phase of the development is likely to give rise to direct and indirect benefits to businesses in the area.

The Environmental Statement suggests that the presence of the wind farm will not act as a deterrent to tourists, and a number of studies are referred to in support of this. It is concluded that impacts on tourism due to the operation of the wind farm are considered to be of minor significance.

Consultees/Representations

Dunoon and Cowal Marketing Group strongly object to the proposal on the basis that it would cause significant damage to the fragile local tourist industry and cite alternative surveys that conclude that serious financial damage can result from wind farm development in scenic tourism areas. DCMG also note that the applicant has employed Land Use Consultants who ironically were the authors of the Strategic Framework & Action Plan document for Dunoon and the National Park Gateway in which it is stated, "the area is a unique place which benefits from a particularly high quality natural environment". This would appear to support any views that 19 giant turbines would be totally unacceptable on a high moorland ridge. It is also pointed out that in the ES, only hotels and restaurants are covered with no mention of other forms of holiday accommodation including caravan parks and self-catering and other visitor attractions.

VisitScotland represent a number of local Cowal tourism businesses who are keen to point out that while they are generally supportive of renewable energy in principle, they object to inappropriate and insensitive siting of large industrial wind turbines. These could have a devastating impact on the many scenic views enjoyed by visitors as well as potential operational noise impact. It is suggested that tourism is worth £300m per year to the economy of Argyll and Bute contributing around one third of the area's GDP and employing up to 505 of the population. Recent visitor surveys suggest that 40% of all visitors choose to visit the area because of the quality of the scenery, rising to 66% of overseas visitors. A study by VistScotland highlighted that a quarter of visitors were less likely to visit an area because of the cumulative visual impact of a number of wind farms. Little consideration appears to have been given in the ES on potential impact to the tourism industry, particularly in this fragile rural area. Suggest that in such areas more sustainable and alternative sources e.g. tidal, wave, solar and biomass be considered to reduce environmental impact.

The Department's View

Other objectors from within Argyll and Bute involved in the provision of tourist services concur with the views of DCMG, and many of the previous visitors to the area who have written to object, have expressed the view that the presence of wind farms would be a deterrent to them making return visits. Clearly, opinions are polarised on the acceptability of wind farms generally, and willingness to accept them as a feature in the countryside may well be influenced by attitude and ideology, as much as the specific attributes of any particular development. It is probably fair to say that the more prominent a scheme is, and the more an area becomes subject to multiple wind farm sites, the less likely it is to prove attractive as a destination to tourists. While no specific policy relating to tourism, visitors to this area come for its scenery, wildlife, natural and historical heritage where the development would be contrary to such policies.

Accordingly, the department would support the views of the consultees/objectors.

j) Telecommunication and Aviation Interests

No adverse impacts are identified and no objections have been raised by any other military or civilian aviation interests or telecommunication operators.

Consultees/Representations

Only NATS/NERL originally objected to the proposal but comment that that while the proposal is likely to impact on electronic infrastructure, no safeguarding objection is raised. No other aviation or telecommunication concerns have been raised.

The Department's View

Based on the comments from consultees, the department has no reason to doubt the findings contained in the ES.

(iv) Conclusions

Within Argyll and Bute, The Council has already responded to renewable energy development in particular to wind farm development with several schemes now operational and more in the planning process. In the Argyll and Bute Modified Finalised Draft Local Plan June 2006 'preferred areas of search' have been identified with potential capacity to accommodate further growth. Outside these favoured locations, 'constrained areas' have been identified where these are considered to be essentially incompatible for commercial wind farm development, irrespective of turbine height. Incompatibility in these 'constrained areas' is based on the presence of National Scenic Areas, highly valued landscapes with semi-wilderness or panoramic qualities, highly valued settings in and around outstanding conservation areas and historic landscapes, and cumulative impacts with existing or consented wind farm developments.

The proposed wind farm development lies within a 'constrained area', close to a National Scenic Area and within and affecting areas of panoramic quality and highly valued natural and historical landscapes.

The Environmental Statement contains significant information including photomontage and wireframe images from a number of agreed locations. These photomontages and wireframes are considered to be the best realistic impression to assess the visual impact of 19 No 101.5m high turbines sited on the crest of a prominent 400 metre high ridge. It is however considered that the precise locations and quality of these images are inconclusive to support the Environmental Statement opinion that the wind farm would only have a general moderate impact. While the wind farm site would be comparatively screened from many parts of Dunoon, Bullwood, Hunter's Quay and Sandbank, settlements and sensitive locations further away will be most significantly affected e.g. Rothesay, Port Bannantyne, Inverchaolain, Inverclyde, in addition to ferry/sailing movements on the Firth of Clyde and approaches to the Kyles of Bute.

Given the impact on a National Scenic Area, and other areas of panoramic quality it is considered that the social or economic benefits of the scheme do not outweigh the overall integrity and potential environmental damage to these areas. No mitigation measures are proposed that would lessen the impact that 19 No. high industrial structures and associated plant, buildings and extensive tracks would have on an area of natural beauty in a wider unspoiled landscape.

While the applicant has submitted significant information within the Environmental Statement it is considered that there is insufficient and inconclusive evidence to suggest that ecological and habitat concerns would not be significantly affected during both construction and operation. In particular, golden eagle, a European protected species and black grouse, a UK and locally protected species, could be significantly affected. Council policies seek to safeguard and enhance ecological interests and habitats where the proposal would be contrary to many policies at National, Structure and Local Plan level. This view is supported by consultees and objectors. NPPG 14 'Natural Heritage' advocates that in instances where scientific evidence is inconclusive and potential damage could be significant, the precautionary principle is recommended in safeguarding biodiversity.

Given all of the foregoing, it is considered that any perceived social or economic benefits of the scheme do not outweigh the significant impact that the proposed wind farm development could have on recognised and historic areas of high landscape value and the development of moorland and moorland fringe that provides habitat to particular protected (and important unprotected species).

The proposal is contrary to many policies contained at European, National, Structure and Local Plan levels. Scottish Natural Heritage, the RSPB, Bute Community Council, South Cowal Community Council, Dunoon and Cowal Marketing Group, Isle of Bute Marketing Group and the Ramblers Association all have serious concerns for the proposal which could have such a devastating impact on the landscape and environment to the detriment not just to the flora and fauna within but in terms of landscape and visual impact with associated concerns for tourism. To date the department has received 151 letters of representation with 112 letters of objection and 39 letters of support. Many concerns raised relate to the impact of the wind farm on established areas of panoramic quality in terms of ecological and visual impact. The Council, through its adopted policies in the Cowal Local Plan and through the emerging Argyll and Bute Local Plan, are continually trying to improve and enhance Cowal as a tourist destination for developments which would not adversely affect or destroy the environment. The scale of the proposal and its detrimental impact on an unspoiled prominent moorland area with its associated habitats leaves the department with no alternative than to recommend refusal.

06/02000/DET Letters of Objection (112)

T Heijgelaar,	105 Alexandra Parade Dunoon PA23 8AN	09/10/2006	O
Eva Thomson	133 Bullwood Road Dunoon PA23 7QN	09/11/2006	O
James Douglas	133 Bullwood Road Dunoon PA23 7QN	09/11/2006	O
David Dain	14 Dixon Avenue Kirn Dunoon Argyll PA23 8NA	30/11/2006	O
Mrs Daisy Heaney	15 Parkway Court Off Blairhill Street Coatbridge ML5	11/10/2006	O
Mary Daley	16 Ashmill Court Beulah Grove West Croydon Surrey CR02QU	12/10/2006	O
Ian Hopkins	179 High St. Rothesay	19/10/2006	O
Ian Hopkins	179 High Street Rothesay PA20 9BS	19/10/2006	O
Roderick Angus	2 Melford Avenue Giffnock Glasgow G46 6NA	10/10/2006	O
Amanda Hawkins	2 Woodhurst Lane Wokingham Berkshire RG41 1JQ	09/10/2006	O
H MacLean	20 Clyde Street Kirn Argyll PA238DX	17/10/2006	O
James Dougall	23 Mount Pleasant Road Rothesay Isle Of Bute Argyll And Bute PA20 9HQ	19/10/2006	O
Mrs S Tole	23 Pointhouse Crescent Port Bannatyne PA20 0LG	12/10/2006	O
Ms A Clelland	25 Argyle Street Rothesay PA20 0AU	13/10/2006	O
John Hoddart	25 Marine Road Port Bannatyne Isle Of Bute PA20 0LL	17/10/2006	O
Harry Lymburn	27 Argyle Place Rothesay Isle Of Bute PA20 0BA	17/10/2006	O
James Henry Law And Diana Jane Law	3 Birch Lodge Bullwood Road Dunoon Argyll PA23 7QN	17/10/2006	O
John Coniam	31 Deansgate Hansworth	11/10/2006	O

Kathy Coniam	Bracknell Berkshire RG12 7HU 31 Deansgate Hanworth Bracknell RG12 7HU 34 High Road Port Bannatyne	13/10/2006	O
R And E Chisholm	PA20 0PP 34 High Road Port Bannatyne	12/10/2006	O
R And E Chisholm	PA20 0PP 34 Shore Road Port Bannatyne Isle Of Bute Argyll And Bute	01/11/2006	O
Michelle Craig	PA20 0LQ 35F Alfred Street Dunoon	11/10/2006	O
James Moir	PA23 7PG 38 Mount Stuart Road Rothesay Isle Of Bute	31/01/2007	O
Margaret Whaley	PA20 9EB 38b Church Lane Wingfield Trowbridge Wiltshire	17/10/2006	O
Bernard G Pendle	BA14 9LW 38b Church Lane Wingfield Trowbridge Wiltshire	12/10/2006	O
Alison Mary Pendle	BL14 9LW 4 Millhouse Road Strathaven	12/10/2006	O
Owner /Occupier	ML10 6DB 40 Argyle Street Rothesay	06/11/2006	O
William And Heather Finlay	PA20 0AX 41 Pigott Road Wokingham Berkshire	10/10/2006	O
Muriel Brown	RG40 1PZ 46 Leapmoor Drive Wemyss Bay	13/10/2006	O
R Charnock-Smith	PA18 6BT 5 Butterfield Woburn Green Bucks	08/11/2006	O
Sandra Maxwell	HP10 0PX 5 Shore Road Port Bannatyne Isle Of Bute	13/10/2006	O
Mrs M Harman	PA20 0LQ 5 Shore Road Port Bannatyne Isle Of Bute	17/10/2006	O
Mrs M Harman	PA20 0LQ 51/2 Argyle Place Rothesay	01/11/2006	O
Philip Mason	PA20 0BZ 53 Bissley Drive Maidenhead Berkshire	04/12/2006	O
Beatrice Lyons	SL6 3UX 55 Hazelwood Grove Sanderstead South Croydon	13/10/2006	O
Linda Daley	Surrey	12/10/2006	O

CR2 9DW

Rickie Daley	55 Hazelwood Grove Sanderstead South Croydon Surrey CR2 9DW	12/10/2006	O
Jean Hawkins	55 River Way Christchurch Dorset BH23 2QQ	13/10/2006	O
Alan Cumming	66 Langhouse Road Inverkip PA16 0BN	20/11/2006	O
Kevin Hawkins	8 Craignethan Mountstuart Road Rothesay PA20 9LF	09/10/2006	O
Ms A Cunningham	9 Scour O'Doon Road Ayr KA8 0SS	13/10/2006	O
Andrew Stevenson	9a Marine Place Rothesay PA20 0LF	13/10/2006	O
Wallace Fyfe	Ascog Hall Isle Of Bute Argyllshire PA20 9EU	23/10/2006	O
Katherine Fyfe	Ascog Hall Isle Of Bute PA20 9EU	11/10/2006	O
Wallace Fyfe	Ascog Hall Isle Of Bute PA20 9EU	11/10/2006	O
Franklin McLean	Balandra 20 Clyde Street Kirn Argyll PA23 8DX	20/10/2006	O
Heather McLean	Balandra 20 Clyde Street Kirn Argyll PA23 8DX	20/10/2006	O
Mr A C Harrison	Balmory Hall Isle Of Bute PA20 9LL	13/10/2006	O
Mrs B Harrison	Balmory Hall Isle Of Bute PA20 9LL	13/10/2006	O
Stuart Malcolm	Beechcroft 25 Kilbride Avenue Dunoon Argyll PA23 7LH	24/10/2006	O
Kathryn M D Logan	Benview Tayinloan Tarbert Argyll PA29 6XG	13/10/2006	O
Mrs E A Wilton	Burnfoot Cottage Glenstriven Toward Argyll PA23 7UN	07/12/2006	O
G A Leonard	Cannon House Hotel 5 Battery Place Rothesay PA20 9DP	13/10/2006	O

Allan Angus	Cherrygale Cottage Portavadie Tighnabruaich PA21 2DA Chirnside Shore Road Innellan Dunoon	12/10/2006	O
Janet Lowe	Argyll Chirnside Shore Road Innellan Dunoon	17/10/2006	O
Alma Lowe	Clandale Eastlands Road Isle Of Bute	17/10/2006	O
Alastair MacKenzie	PA20 9EN Clandale Eastlands Road Isle Of Bute	17/10/2006	O
Alistair McKenzie	PA20 9EN Clansdale Eastlands Road Rothesay	01/11/2006	O
Alastair MacKenzie	PA20 9EN Corra Otter Ferry Argyll	11/10/2006	O
Shirley F Callan	PA21 2DH Corra Otter Ferry Argyll	10/10/2006	O
Tom Callan	PA21 2DH Craiglea 27 Mount Stuart Road Rothesay	10/10/2006	O
John B Dunn	PA20 9EB Craiglea 27 Mount Stuart Road Rothesay	01/11/2006	O
John B Dunn	PA20 9EB Daisy Cottage 30 Wyndham Road Isle Of Bute	10/10/2006	O
Elizabeth Rae	PA20 0NR Daisy Cottage 30 Wyndham Road Isle Of Bute	01/11/2006	O
Elizabeth Rae	PA20 0NR Drum Cottage Kilfinnan Tighnabruaich Argyll	09/10/2006	O
W S Sutherland	PA21 2ER Dunagoil Farm Kingarth Isle Of Bute	17/10/2006	O
A J Steven	PA20 9LX Dunoon And Cowal Marketing Group Lyll Cliff 141 Alexandra Parade Dunoon	06/10/2006	O
Philip Norris	PA23 8AW Flat 2 Gillemart Court 94 Buccleuch Street Glasgow	09/10/2006	O
Brenda Lowe	G3 6DU Glasvaar Cottage Ford By Lochgilphead Argyll	17/10/2006	O
PBJ Holt		17/10/2006	O

PA31 8RJ			
P E Holt	Glasvaar Cottage Ford By Lochgilphead Argyll PA311 8RJ Glencairn 14 North Campbell Road Innellan Dunoon	17/10/2006	O
Karen Mitchell	PA23 7SE Hillcrest Clachan By Tarbert Argyll	25/01/2007	O
Derrick Lewin	PA29 6XL Hillcrest Clachan By Tarbert Argyll	09/10/2006	O
D Lewin	PA29 6XL Isle Of Bute Marketing And Tourism Cannon House Battery Place Rothesay	06/10/2006	O
Tony Harrison	PA20 9DP Marnock Glenburn Road Rothesay	13/10/2006	O
Cameron And Philomena Middleton	PA20 9JP Millburn Cottage Ascog Rothesay	09/10/2006	O
Dr And Mrs D H Reid	PA20 9ET Millburn Cottage Ascog Rothesay	09/10/2006	O
Dr D H Reid	PA20 9ET Mount Stuart Isle Of Bute	01/11/2006	O
John C Bute	PA20 9LR	18/10/2006	O
Alistair Tough	No Address	24/10/2006	O
Barbara A Hill	No Address	24/10/2006	O
Frank J Hill	No Address	24/10/2006	O
Gordon Hill	No Address	26/10/2006	O
Jean Tough	No Address	24/10/2006	O
Nick Beckwith	No Address	20/10/2006	O
Patricia Hill	No Address	24/10/2006	O
W D Cockburn	No Address	10/10/2006	O
Irene Chapman	No Address Submitted	10/11/2006	O
Jean Hassall	No Address Submitted	16/11/2006	O
W M Hassall	No Address Submitted	16/11/2006	O
Mrs L E Cowan	Oatfield House Campbeltown PA28 6PH Prestwick Court Carrickstone Cumbernauld	09/10/2006	O
Yvonne Davie	G68 0JE Ranachan House High Cluniter Innellan Dunoon	12/10/2006	O
Iain R Gamage	PA23 7SA Ranachan House Innellan Dunoon	21/11/2006	O
S J Gamage	PA23 7SA	22/11/2006	O

Mr Robert McSeveney	Requested By Email Rhudle Farm By Lochgilphead Argyll	06/10/2006	O
Frances Warmerdam	PA31 8QE Rhudle Farm By Lochgilphead Argyll	10/10/2006	O
Mr J Warmerdam	PA31 8QE River Rocket Holy Loch Marina Snadbank Dunoon Argyll	10/10/2006	O
John Orr	PA23 8FE Rose Cottage 42 Shore Road Port Bannatyne Isle Of Bute	28/11/2006	O
Richard Snape And Alison Ramsey	PA20 0LQ Secretary Bute Community Council Craigielea Cottage Ardbeg Isle Of Bute	09/10/2006	O
Julian Hankinson	PA20 0NL Stewart Hall Isle Of Bute	24/10/2006	O
Donald Campbell	PA20 0QE Stuck Farm Rothesay	10/10/2006	O
Iain F Crawford	PA20 0QL The Coach House 48 Forsyth Street Greenock	12/10/2006	O
Alex McWhirter	PA16 8DY The Ferns Sandybeach Innellan Dunoon	07/12/2006	O
Wendy Higgis	PA23 7SS The Shore House Shore Road Brodict Isle Of Arran	09/10/2006	O
Mrs Sheila Tracey	KA27 8AJ Tigh An Drochaid Kilchrenan Taynuilt Argyll	09/10/2006	O
G R Henderson	PA35 1HD Tigh An Drochaid Kilchrenan Taynuilt Argyll	11/10/2006	O
M Henderson	PA35 1HD Upper St Brendans 16 Crichton Road Rothesay	11/10/2006	O
W T And Isabel H Robertson	PA20 9JR Wells Old Lodge Bedrule Nr Hawick Roxburgh	12/10/2006	O
Simon Blackwood	TD9 8TD Westpoint 40 Shore Road Port Bannatyne	06/10/2006	O
Robert W Crawford	PA20 0LQ	12/10/2006	O

	Wildland Campaign Officer The Ramblers' Associaton Kingfisher House Auld Mart Business Park Milnathort Kinross		
Davie Black	KY13 9DA Woodside Toward Dunoon	27/10/2006	O
Mrs B McFarlane	Argyll PA23 7UJ	30/10/2006	O

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06/02000/DET Letters of Support (39)

Alan Gibb	13 Ros-Mhor Gardens Sandbank Dunoon Argyll 133 Fairhaven Kirn	11/01/2007	S
Paul Cruickshanks	Dunoon 145 Edward Street Dunoon	12/01/2007	S
Norman Livingstone	Argyll PA23 7PH 15a King Street Dunoon	30/11/2006	S
Victoria Oliphant	Argyll PA23 7BH 2 Eldon Cottage 18 Wellington Street Dunoon	04/12/2006	S
F Findlay	PA23 7LA 2 Eldon Cottage 18 Wellington Street Dunoon	13/12/2006	S
J Findlay	PA23 7LA 2 Montgomery Place Strachur Argyll	13/12/2006	S
A Blair	PA27 8DR 3 Dixon Park Dunoon	12/01/2007	S
J Oliphant	PA23 8JG 4 Alexandria Terrace William Street Dunoon	04/12/2006	S
Karen Rooney	PA23 7JE 42 Forest View Strachur Argyll And Bute	17/01/2007	S
Owner /Occupier	PA27 8DQ 6 Deer Park Glen Massan Dunoon	12/01/2007	S
Dinah McDonald	PA23 8RA 7 George Street Hunters Quay Dunoon	15/01/2007	S
Archie Kennedy	PA23 8JT 8 Argyll Terrace Kirn Dunoon	04/12/2006	S
Gillian Stewart	Argyll PA23 8 8 Argyll Terrace Kirn	04/12/2006	S
David Stewart	Dunoon PA23 8LR 9 Dunselma Court Strone Dunoon	06/12/2006	S
David Anderson	PA23 8RT 93 Shore Road Innellan	12/01/2007	S
Alison Ireland	93 Shore Road Innellan Argyll	30/11/2006	S
Stanley Ireland	PA23 7SP 95 Alexander Street	30/11/2006	S
A Gilmour		28/11/2006	S

	Dunoon PA23 7BD Aurelia 15A King Street		
Ronald Oliphant	Dunoon PA23 7BH Blairanboich Toward	04/12/2006	S
Sheila R Lang	Dunoon PA23 7UJ Brackley Cottage	06/12/2006	S
Sheila Stewart	Inverchoalin Brackley Cottage Toward	06/12/2006	S
Alan Stewart	Dunoon PA23 7UN Burnbank Top Flat Wynham Road Innellan	06/12/2006	S
Andrew Gillies	Dunoon Argyll PA23 7 Burnbank Wyndham Road Innellan	04/12/2006	S
Carrol Gillies	Dunoon Argyll C/o Lamont House Toward	04/12/2006	S
M MacDonald	Dunoon Argyll PA23 8UJ Caol Ile Cottage 145 Edward Street	06/12/2006	S
Michelle Livingstone	Dunoon Argyll PA23 7PH Drumclog 4 Alfred Street	30/11/2006	S
Nimisaha Dunn	Dunoon PA23 7QU Flat 1/1 100 John Street	30/11/2006	S
Jean S Munn	Dunoon PA23 7NS Hazelwood (Lower Flat) Cromlech Road Sandbank	04/12/2006	S
Alison Titmus	Dunoon PA23 8PZ Hope Cottage Blairmore	30/11/2006	S
W A Stewart	Dunoon PA23 8TP Inverchaolain Lodge Toward	06/12/2006	S
W McCaffrey	Dunoon PA23 7UN Inverchaolain By Loch Striven	06/12/2006	S
Mary Lamb	Dunoon PA23 7UN Killellan Farm Toward	30/11/2006	S
B Mitchell	Dunoon Argyll PA23 7UJ Killellan Farm Toward	04/12/2006	S
A Mitchell	Dunoon	04/12/2006	S

J Mitchell	Argyll PA23 7UJ Lamont House Toward Dunoon Argyll And Bute PA23 7UJ Neamh 77a Argyll Road Dunoon	04/12/2006	S
Grace Gilbride	PA23 8LZ T/L 4 Alexandria Terrace William Street Dunoon	30/11/2006	S
Andrew Rooney	PA23 7JE The Lodge Glenstriven Estate Toward	11/01/2007	S
I Smith	PA23 7UN The Lodge Glenstriven Estate Toward	28/11/2006	S
V Smith	By Dunoon PA23 7UN	28/11/2006	S

39 letters of support