

**Delegated or Committee Planning Application Report and Report of handling as required by Schedule 2 of the Town and Country Planning (Development Management Procedure) (Scotland) Regulations 2008 relative to applications for Planning Permission or Planning Permission in Principle**

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**Reference No:** 11/01586/PP

**Planning Hierarchy:** Local Development

**Applicant:** Mr Robert Dickson

**Proposal:** Erection of 3 No.15kw Wind Turbines (15.4 metre to hub, 20.9m to tip)

**Site Address:** Land Southwest of Leob Cottage, Pennyghael, Isle of Mull

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**DECISION ROUTE**

**(i) Local Government Scotland Act 1973**

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**(A) THE APPLICATION**

**(i) Development Requiring Express Planning Permission**

- Erection of 3 x 15kw, 15.4m (to hub) Wind Turbines
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**(B) RECOMMENDATION:**

Having due regard to the Development Plan and all other material considerations, it is recommended that the application be refused for the reasons appended to this report.

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**(C) HISTORY:**

10/01604/PP

Erection of 3 x 15 metre wind turbines – Withdrawn: 23/08/11

10/01149/PP

Erection of 3 x 15 metre wind turbines – Withdrawn: 13/10/10

09/01247/PP

Erection of 3 x 15 metre wind turbines – Withdrawn : 12/08/10

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(D) **CONSULTATIONS:**

Scottish Natural Heritage

Letter dated 16/09/11 stating no objection to the proposed development but advising, in summary, *“that the Council should consider requesting further information with regard to the local impact of the development on this important tourist route. The photographs submitted to date are inconclusive in allowing visual impact from the road to be established”*. SNH express concerns that the development could involve adverse landscape impacts.

Royal Society for Protection of Birds

Letter dated 22/09/11 advising that, in summary, *“the proposed site is approximately 1.8km from the Cruic agus Cladach Mhuile SPA designated for golden eagle; and several kilometres from the nearest known eyrie which belongs to a territory which is not part of the SPA population. The location of this development, although close to the road, positions the turbines along a hill slope in an upwards line along that leads onto higher ground. Bird work will be required to inform the application which should establish the usage and potential impacts of the development”*.

Public Protection Unit

Memo dated 13/09/11 advising that *“the noise data supplied by the applicant in support of the proposal identifies that noise from the operation of the wind turbine will not have an adverse impact upon the nearest residential property”*.

Mull Community Council

Letter dated 14/09/11 objecting to the proposed development stating that, in summary, *“given this is a proposed wind farm in an area of natural scenic beauty there must be a requirement for an impact assessment and public consultation to be carried out by the applicant. The photographs provided are totally inadequate. The proposal that three wind turbines are to be located in an area of panoramic and historic quality and their height of 20 metres including rotor, will have a considerable and detrimental impact on the landscape. They are totally out of character with the historic island setting and the visual amenity of both residents and visitors to the Ross of Mull (some 200,000 pass that spot per annum)”*. The Community Council also refer to relevant development plan policies in support of their objections.

NERL Safeguarding Office

Letter dated 27/09/11 advising no safeguarding objection to the proposed development.

West of Scotland Archaeology Service

Letters dated 29/09/11 and 04/10/11 advising that, in summary, *“the montages submitted by the applicant suggest a possible discrepancy between the location of the turbines shown on the plans, and that illustrated in the photographs. Rather than running down the hill slope, the various photographs appear to show the three turbines running along a fairly level shelf of land. This is particularly apparent in the photographs taken from Sallachran and Bremenvoir, to the northwest, which appear to show the turbines in a line perpendicular to the direction of view, and all arranged at the same elevation, suggesting that they are aligned along the contour, rather than running downhill. This is also the case in relation to the photograph taken from Taoslin on which the turbines occupy a fairly level shelf of ground below the main slope of the hill.*

*This apparent discrepancy between the plans and photographs makes it difficult to accurately assess the visual impact of the proposal on the setting of the monuments. I would suggest that the applicant be asked to submit new photomontages, illustrating the visibility of the turbines were they to be erected in the position shown on the current plans”. The requested accurate illustrations would be necessary to allow full consideration of the impacts of the development on a monument near the site and on scheduled monuments in the wider context.*

The above represents a summary of the consultation response received. Full details of the letters of representation are available on the Council's Public Access System by clicking on the following link <http://www.argyll-ute.gov.uk/content/planning/publicaccess>.

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**(E) PUBLICITY:**

The proposal has been advertised in terms of Regulation 20 procedures, closing date 06/10/11.

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**(F) REPRESENTATIONS:**

16 representations have been received regarding the proposed development.

Fiona McLean, Taigh Geal, Fionnphort, Isle of Mull, PA66 6BL

David MacLean, Braehead, Stonehaven, Aberdeenshire, AB39 2PS (3 representations)

Dr Susan K Reed, Taigh aig an Oir, Ardtun, Isle of Mull, PA67 6DH

Martin Caldwell, Taigh Geal, Fionnphort, Isle of Mull, PA66 6BL

Claire MacLean, Hillpark, Bunessan, Isle of Mull, PA67 6DN

David MacKichan, Dail an Oir, Knockan, Bunessan, Isle of Mull

Ms Sue Murdoch, Allt nam Feidh, Pennyghael, Isle of Mull, PA70 6HF

Brian Thomas, Druim, Thaoslainn, Bunessan, Isle of Mull, PA67 6DL

Dr Anita Tunstall, Faolainn, Ardtun, Bunessan Isle of Mull, PA67 6DH

Susan Clare, The Hill House, Kilpatrick, Isle of Mull, PA70 6HF

John Clare, Leob Cottage, by Bunessan, Isle of Mull, PA70 6HF

Mr David Greenhalgh, Rehmor Croft , Bunessan, Isle of Mull, PA67 6DL

Fiona Brown, Tigh Na H'Abhann, Kinloch, Pennyghael, Isle of Mull, PA70 6HB

Tim & Linda Dawson, Maolbhuidhe, Fionnphort, Isle of Mull, PA66 6BP

Philip Townend, Highfields, Bunessan, Isle of Mull, PA67 6DH

Mrs Jennifer Johnston, Cnoc Dubh, Lee, Bunessan, Isle of Mull, PA67 6DN

(i) **Summary of issues raised**

- There are a number of inaccuracies in the application between the drawings and photomontages.

*Comment: this concern is sustained by the officer's assessment. The photomontages submitted are to an amateur standard and appear to misrepresent the turbine type, position and height, as well as giving a confusing series of errors or anomalies between the listed photographs, the assessment conclusions of the applicant, and the content that has been illustrated.*

- The proposal shows no consideration for the visual and environmental impact on the landscape of the Ross of Mull.

*Comment: this concern is shared by the officer's assessment, based on the absence of accurate visualisations.*

- The proposal will have an adverse impact on and dominate an important tourist route leading to the historic island of Iona.

*Comment: the visual impacts of the development will exceed those illustrated by the applicant and the turbines would be visible from the main tourist route to Iona.*

- The proposal will have an adverse impact on the site of a monument of Gaelic cultural/historical significance.

*Comment: this concern is also raised by WoSAS albeit that the true impact is difficult to establish given the poor quality of the planning application documents.*

- The local community will gain little or no benefit from the proposal, the proposal is an industrial proposal, purely for profit.

*Comment: this is not a material planning consideration.*

- The proposal will result in the endangerment of birdlife in the area as it is within close proximity to golden eagle and white-tailed eagle breeding territories.

*Comment: SNH do not object to the development, but RSPB highlight a need for bird survey work to inform the assessment. No such survey work has been undertaken and as the application is recommended for refusal, the planning service does not recommend the applicant invest in this work at this time.*

- There has been no public consultation on the proposed development.

*Comment: there is no formal requirement for pre-application consultation with the community on a project of this size.*

- The proposal will result in significant visual and noise impact on nearby residential properties, particularly 'Hillpark'.

*Comment: visual impacts are considered to exceed that illustrated by the applicant, but noise impacts are at a level where the Council's Environmental Health Officers have confirmed the turbines will not cause unacceptable impacts.*

- The electricity infrastructure on Mull is reaching capacity and therefore this scheme will preclude planned community schemes.

*Comment: Grid capacity issues are not a material planning consideration.*

The above represents a summary of the issues raised. Full details of the letters of representation are available on the Council's Public Access System by clicking on the following link <http://www.argyll-bute.gov.uk/content/planning/publicaccess>.

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## **(G) SUPPORTING INFORMATION**

**Has the application been the subject of:**

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| <b>(i) Environmental Statement:</b>   | No |
| <b>(ii) An appropriate assessment under the Conservation (Natural Habitats) Regulations 1994:</b>   | No |
| <b>(iii) A design or design/access statement:</b>   | No |
| <b>(iv) A report on the impact of the proposed development e.g. retail impact, transport impact, noise impact, flood risk, drainage impact etc:</b> | No |

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## **(H) PLANNING OBLIGATIONS**

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| <b>(i) Is a Section 75 agreement required:</b> | No |
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| <b>(I) Has a Direction been issued by Scottish Ministers in terms of Regulation 30, 31 or 32:</b> | No |
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## **(J) Section 25 of the Act; Development Plan and any other material considerations over and above those listed above which have been taken into account in the assessment of the application**

- (i) List of all Development Plan Policy considerations taken into account in assessment of the application.**

Argyll and Bute Structure Plan 2002

STRAT SI 1 – Sustainable Development

STRAT DC 5 – Development in Sensitive Countryside

STRAT DC 6 – Development in Very Sensitive Countryside

STRAT DC 7 – Nature Conservation and Development Control

STRAT DC 8 – Landscape and Development Control

STRAT DC 9 – Historic Environment and Development Control

STRAT RE 1 – Wind Farm/Wind Turbine Development

Argyll and Bute Local Plan 2009

LP ENV 1 – Impact on the General Environment

LP ENV 10 – Impact on Areas of Panoramic Quality (APQs)

LP ENV 16 – Development Impact on Scheduled Ancient Monuments

LP ENV 17 – Development Impact on Sites of Archaeological Importance

LP TOUR 1 – Tourist Facilities and Accommodation, including Caravans

LP REN 1 – Wind Farms and Wind Turbines

Appendix A – Sustainable Siting and Design Principles

**(ii) List of all other material planning considerations taken into account in the assessment of the application, having due regard to Annex A of Circular 4/2009.**

SPP, Scottish Planning Policy, 2010

Annex to Planning Advice Note 45 : Renewable Energy Technologies

Micro Generation Domestic Turbines Briefing Note, 2010

Micro renewables and the natural heritage, SNH, 2009

Landscape Assessment of Argyll and the Firth of Clyde, SNH, 1996

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<b>(K)</b>	<b>Is the proposal a Schedule 2 Development not requiring an Environmental Impact Assessment:</b>	Yes
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Screening opinion confirms that a formal EIA is not required in this instance.

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<b>(L)</b>	<b>Has the application been the subject of statutory pre-application consultation (PAC):</b>	No
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<b>(M)</b>	<b>Has a sustainability check list been submitted:</b>	No
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<b>(N)</b>	<b>Does the Council have an interest in the site:</b>	No
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<b>(O)</b>	<b>Requirement for a hearing:</b>	No
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In deciding whether to hold a discretionary hearing, Members should consider:

- How up to date the Development Plan is, the relevance of the policies to the proposed development, and whether the representations are on development plan policy grounds which have recently been considered through the development plan process.

- The degree of local interest and controversy on material considerations, together with the relative size of community affected, set against the relative number of representations and their provenance.

In this case, whilst the application has been the subject of 16 individual representations, these are all raising objections to the proposed development. Many of the grounds of objections are shared by the Planning Officer assessment. As the application is being recommended for refusal, it is not considered that a hearing would add value to the determination process and therefore it is recommended that Members do not undertake a hearing prior to the application being determined.

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**(P) Assessment and summary of determining issues and material considerations**

Planning permission is sought for erection of 3 No. 15 kilowatt, 15.4 metre (to hub) wind turbines on an area of land to the southwest of Leob Cottage, Ardtun, Bunessan, Isle of Mull.

In terms of the adopted Argyll and Bute Local Plan, the northernmost turbine is within Sensitive Countryside under STRAT DC 5 and the other two turbines are within Very Sensitive Countryside under STRAT DC 6.

STRAT DC 5 Sensitive Countryside does not generally have the capacity to successfully absorb development in the open countryside, which is why support is limited to small scale infill, rounding off and redevelopment opportunities for built development. Exceptions can be made by 'special cases' for developments if they sympathetically integrate with the landscape and settlement pattern and involve other benefits to the environment, community or economy or have a demonstrated locational need.

STRAT DC 6 Very Sensitive Countryside is more vulnerable and has an extremely limited capacity to successfully absorb development. The designation applies to most upland and mountain areas and requires that development is strictly controlled and carefully managed. Provision is made for wind energy proposals to be supported provided it is located on well chosen site that comply with STRAT RE 1. Developments that fail to meet these tests and/or involve incongruous or unacceptable siting, scale and design characteristics or breach the carrying capacity of the wider landscape, will be found contrary to the policy.

STRAT RE 1 confirms wind energy proposals will be tested against STRAT DC 7, 8 and 9, and will be supported if there is no significant adverse impact on local communities, natural environment, landscape character and visual amenity, historic environment, and telecoms infrastructure.

Policy LP REN 1, Wind Farms and Wind Turbines, confirms that wind farm developments will be supported in forms, scales and sites where the technology can operate efficiently, where servicing and access implications are acceptable and where the proposed development will not have an unacceptable adverse impact directly, indirectly or cumulatively on the economic, social or physical aspects of sustainable development.

Furthermore, wind farms/turbines must satisfactorily address:

- § communities, settlements and their settings;
- § areas and interests of nature conservation significance including local biodiversity, ecology and the water environment;
- § landscape and townscape character, scenic quality and visual and general amenity
- § core paths, rights of way; or other important access routes
- § sites of historic or archaeological interest and their settings
- § telecommunications, transmitting and receiving systems
- § important tourist facilities, attractions or routes

§ stability of peat deposits

The site is also situated within the Ross of Mull Area of Panoramic Quality where Policy LP ENV 10, Impact on Areas of Panoramic Quality, states that 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.

Appendix A of the adopted Argyll and Bute Local Plan outlines why impact on the landscape is a major consideration when new development is proposed and all significant developments require to be assessed for their compatibility with the present landscape character as detailed in the SNH Landscape Character Assessment. Policy LP ENV 10 affords the landscape a designation of regional importance, where a more cautious approach to wind turbine development is justified.

It is considered that the proposal for erection of 3 No. 15 metre high wind turbines, by virtue of their verticality, motion, number, height, and siting will introduce an incongruous feature into the landscape to the detriment of the landscape character of the Ross of Mull Area of Panoramic Quality, which is an area characterised by a flat, open, wild and rugged landscape which does not lend itself to wind energy development, and the impacts are increased in the case of multiple turbine installations. The proposal would be contrary to Development Plan Policy which seeks to safeguard designated scenic areas from inappropriate development which would undermine the visual quality and landscape character of such areas.

Although photomontages have been submitted, they are amateur in style and appear to be full of errors which mean the Planning Authority should place no reliance upon the illustrations submitted. From a site visit and assessment of the proposals, it is considered that the visual impacts of the turbines within this landscape would be much more significant than illustrated by the applicant.

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**(Q) Is the proposal consistent with the Development Plan:** No

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**(R) Reasons why planning permission should be refused.**

The proposal is contrary to Development Plan policy for the reasons for refusal recommended below.

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**(S) Reasoned justification for a departure to the provisions of the Development Plan**

N/A

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**(T) Need for notification to Scottish Ministers or Historic Scotland:** No

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**Author of Report:** Fiona Scott      **Date:** 23/01/12

**Reviewing Officer:** Stephen Fair      **Date:** 02/02/12

**Angus Gilmour**  
**Head of Planning and Regulatory Services**

## REASONS FOR REFUSAL RELATIVE TO APPLICATION REFERENCE 11/01586/PP

1. The erection of three 15.4m high (to hub) wind turbines, by virtue of their verticality, motion, number, height, and siting will introduce a series of incongruous features into the Ross of Mull Area of Panoramic Quality, which is an area identified as being worthy of special protection in view of its recognised landscape and scenic qualities. The area is characterised by a flat, open, wild and rugged landscape, which is vulnerable to change as a consequence of the introduction of inappropriate forms of development. This sensitive landscape does not lend itself to a multiple turbine installation, nor such an elevated site, where visual impacts extend across a wide expanse of surrounding countryside. The turbines proposed would impose significant change upon its immediate surroundings and would impact adversely upon the wider landscape, including the route to the historic island of Iona, by introducing a further focal point, of a type that is alien to the existing environment.

The proposal is contrary to Policies STRAT DC 5, STRAT DC 6, STRAT DC 8 and STRAT RE 1 of the approved Argyll and Bute Structure Plan and Policies LP ENV 1, LP ENV 10, and LP REN 1 of the adopted Argyll and Bute Local Plan, and there are no other material considerations of sufficient weight, including the contribution which the development could make to renewable energy generation and to addressing the consequences of climate change, which would warrant anything other than the application being determined in accordance with the provisions of the development plan.

2. Insufficient information has been submitted that accurately depicts the visual impacts of the proposed development upon the surrounding landscape, the scenic qualities of the area, and the historic environment. In the absence of such detailed information underpinned by a reliable landscape methodology, it has not been demonstrated that the proposal will be capable of being successfully absorbed into the landscape without giving rise to adverse effects. In the absence of an reliable evidence to the contrary, it is considered that the proposal would be unsustainable and would likely be detrimental on a landscape afforded special protection in view of its recognised scenic qualities, could adversely impact on tourism being sited within clear sight of the main tourist route to Iona, and could adversely impact on surrounding sites of historic significance.

The proposal is therefore contrary to Policies STRAT DC 5, STRAT DC6, STRAT DC 8, STRAT DC 9 and STRAT RE 1 of the approved Argyll and Bute Structure Plan and Policies LP ENV 1, LP ENV 10, LP ENV 16, LP ENV 17 and LP REN 1 of the adopted Argyll and Bute Local Plan, and there are no other material considerations of sufficient weight, including the contribution which the development could make to renewable energy generation, which would warrant anything other than the application being determined in accordance with the provisions of the development plan.

**PLANNING LAND USE AND POLICY ASSESSMENT**

**A. Settlement Strategy**

In terms of the adopted Argyll and Bute Local Plan, the northernmost turbine is within Sensitive Countryside under STRAT DC 5 and the other two turbines are within Very Sensitive Countryside under STRAT DC 6.

STRAT DC 5 Sensitive Countryside does not generally have the capacity to successfully absorb development in the open countryside, which is why support is limited to small scale infill, rounding off and redevelopment opportunities for built development. Exceptions can be made by 'special cases' for developments if they sympathetically integrate with the landscape and settlement pattern and involve other benefits to the environment, community or economy or have a demonstrated locational need.

STRAT DC 6 Very Sensitive Countryside is more vulnerable and has an extremely limited capacity to successfully absorb development. The designation applies to most upland and mountain areas and requires that development is strictly controlled and carefully managed. Provision is made for wind energy proposals to be supported provided it is located on well chosen site that comply with STRAT RE 1. Developments that fail to meet these tests and/or involve incongruous or unacceptable siting, scale and design characteristics or breach the carrying capacity of the wider landscape, will be found contrary to the policy.

STRAT RE 1 confirms wind energy proposals will be tested against STRAT DC 7, 8 and 9, and will be supported if there is no significant adverse impact on local communities, natural environment, landscape character and visual amenity, historic environment, and telecoms infrastructure.

Policy REN 1, Wind Farms and Wind Turbines, states the wind farm development will be supported in forms, scales and sites where the technology can operate efficiently, where servicing and access implications are acceptable and where the proposed development will not have an unacceptable adverse impact directly, indirectly or cumulatively on the economic, social or physical aspects of sustainable development.

Furthermore, the following must be satisfactorily addressed in any submission.

- § communities, settlements and their settings;
- § areas and interests of nature conservation significance including local biodiversity, ecology and the water environment;
- § landscape and townscape character, scenic quality and visual and general amenity
- § core paths, rights of way; or other important access routes
- § sites of historic or archaeological interest and their settings
- § telecommunications, transmitting and receiving systems
- § important tourist facilities, attractions or routes
- § stability of peat deposits

The site is also situated within the Ross of Mull Area of Panoramic Quality where Policy LP ENV 10, Impact on Areas of Panoramic Quality, states that 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.

Appendix A of the adopted Argyll and Bute Local Plan states that the impact on the landscape is a major consideration when new development is proposed and all significant developments require to be assessed for their compatibility with the present landscape character as detailed in the SNH Landscape Character Assessment.

**B. Location, Nature and Design of Proposed Development**

The proposal is for three 15.4m high three bladed wind turbines set out in a linear form on an area of land situated to the south of the main A849 Craignure – Fionnphort public road.

Each turbine measures 15.4m from base to hub with three blades each measuring 5.5 metres in length with a diameter of 11 metres. The overall height of the turbines is 20.97m to blade tip.

The site is accessed from the unclassified Lee road off of the main A849 Craignure – Fionnphort public road.

From the information submitted, the application drawings show the proposed wind turbines running down the hill slope in a south to north direction.

However, subsequent photomontages submitted in support of the application appear to show the proposed wind turbines running along a relatively level shelf of land in an east to west direction. Furthermore, photos 1 and 2 are very similar but state they have been taken from two separate vantage points; photo 5 states that the turbines are not visible, when clearly they are; and photos 6 and 7 are identical but state that they have been taken from two separate vantage points. The turbine type shown appears to differ from the submission, the height illustrated appears to be significantly smaller in scale than it will be in reality, and the orientation of the three turbines appears to have been mistakenly assessed when preparing the montages.

Clarification on the discrepancies was sought from the applicant who advised that the photomontages related accurately to the drawings submitted in support of the application.

No confidence should be placed in the visualisations submitted by the applicant which are amateur in style and fail to give an accurate illustration of the impacts of the proposal.

The proposal requires to be assessed against the provisions of Policy LP REN 1 – Wind Farms and Wind Turbines which states that wind farm development will be supported in forms, scales and sites where the technology can operate efficiently, where servicing and access implications are acceptable and where the proposed development will not have an unacceptable adverse impact directly, indirectly or cumulatively on the economic, social or physical aspects of sustainable development.

Furthermore the following must be satisfactorily addressed in any submission.

§ ***communities, settlements and their settings***

From the limited information submitted it is considered that the proposed development will result in the introduction of an incongruous feature into the landscape which would be significant in terms of the immediate site and have an adverse impact on the wider landscape setting of this area, because the site is elevated and open to wider views across an existing series of settlements.

§ ***areas and interests of nature conservation significance including local biodiversity, ecology and the water environment***

The proposed development is not located within any nature conservation designation but is situated approximately 1.8km from the Cnuic agus Cladach Mhuile Special Protection Area (SPA) designated for golden eagle and several kilometres from the nearest known eyrie which belongs to a territory which is not part of the SPA population. Further information, as requested by RSPB, would be required to fully assess the impact of the proposed development on birdlife. This is not being sought at present because the application is not being supported.

§ ***landscape and townscape character, scenic quality and visual and general amenity***

It is considered that the proposed development will introduce an incongruous feature into the landscape which would dominate the wider landscape and have an adverse environmental impact on the Ross of Mull Area of Panoramic Quality. The adverse visual impacts are not considered to be acceptable or desirable.

§ ***core paths, rights of way, or other important access routes***

The proposed development will not impact on any core paths, rights of way or any other access routes.

§ ***sites of historic or archaeological interest and their settings***

The proposed development site is in relatively close proximity to two Scheduled Ancient Monuments (SAM); the promontory fort known as Dun na Muirghaidh and the standing stone at Taoslin. Due to the discrepancy between the application drawings and photomontages, it is not possible to accurately assess the visual impact of the proposed development on the setting of the SAMs.

§ ***telecommunications, transmitting and receiving systems***

The proposed development will not impact upon any telecommunications, transmitting and receiving systems.

§ ***important tourist facilities, attractions or routes***

The development site is close to, and elevated above, the main tourist route (A849) from Craignure to Fionnphort leading to the historic island of Iona. The landscape and scenic qualities of the route to the island are important in creating a sense of place for visitors to the island, and the open, wild and rugged landscape within which the development is to be situated is therefore particularly sensitive to change, as recognised by the designation of the site within an Area of Panoramic Quality and the land allocation of Sensitive Countryside and Very Sensitive Countryside. It is considered that the introduction of three 15.4m high wind turbines within the A849 road corridor in such an open and elevated position, would introduce change with consequent adverse impacts on the existing rural character of the area, which in turn could detract from the existing qualities of this important tourist route.

§ ***stability of peat deposits***

The proposed development will not impact on any peat deposits.

**It is concluded that the proposal is contrary to the terms of Policy LP REN 1 as it will introduce an incongruous feature to the detriment of landscape character, which in turn will have an adverse environmental impact on the Ross of Mull Area of Panoramic Quality and the main tourist route from Craignure to Iona.**

## **C. Landscape Character**

The site is situated within the Ross of Mull which has been designated as an Area of Panoramic Quality.

In terms of The Landscape Assessment of Argyll and the Firth of Clyde (1996), it characterises the Ross of Mull as consisting of boulder moor providing an open, wild and rugged landscape. The road through the Ross of Mull is the principal tourist route to Iona crossing the upland plateau, providing long views along the landscape towards the island of Iona. It further states that *“the immediate fringes of this important road are particularly sensitive to change as they provide the foreground to the most accessible views. The rugged, scenic coastline is also important, particularly in areas close to the tip of the peninsula which are accessible by car”*.

The turbines subject of this application are also located within the ‘Boulders Moor’ Landscape Character Area where any development needs to be very carefully sited as its key characteristic is the wild and rugged landscape.

Structure Plan Policy STRAT DC 8, Landscape and Development Control, states that

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.

Furthermore, Policy LP ENV 10 Policy, Impact on Areas of Panoramic Quality of the adopted Argyll and Bute Local Plan states that 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.

**In this regard, it is considered that the proposal will introduce an incongruous feature to the detriment of landscape character which would have an adverse environmental impact on the Ross of Mull Area of Panoramic Quality and therefore be contrary to the terms of Policies STRAT DC 8 and LP ENV 10.**

#### **D. Historic Environment**

The site is situated in relatively close proximity to two Scheduled Ancient Monuments (SAM); the promontory fort known as Dun na Muirghaidh and the standing stone at Taoslin. Policy ENV 16, Development Impact on Scheduled Ancient Monuments, states that there will be a presumption in favour of retaining, protecting, preserving and enhancing SAMs and their settings. Any development which will have an adverse impact on their settings will not be permitted unless there are exceptional circumstances

It is not considered that the application successfully demonstrates that the SAMs, and their settings, will not be adversely affected by the proposed wind turbines. Indeed, the submission appears to underplay the visual impacts or significance of impacts associated with the development.

**In this regard, it is considered that the proposed development will have an adverse impact on the setting of two Scheduled Ancient Monuments and therefore be contrary to the provisions of Policies STRAT DC 9, LP ENV 16 and LP ENV 17.**

#### **E. Climate change considerations**

In assessing any application associated with the generation of renewable energy it is necessary to have regard to macro environmental consequences as a material consideration. Government and Development Plan policy supports renewable electricity generation in principle, in the interests of addressing climate change, provided that development does not impinge to an unacceptable degree upon its surroundings as well as other caveats. As part of the decision making process, it is necessary to consider whether the advantages associated with the production of electricity from renewable sources, consequent CO<sub>2</sub> savings and the contribution which a development might make to the tackling of global warming.

In this case, although the presence of the turbines will be significant in the landscape, the turbine size at 15kW is limited, and therefore the contribution which the development will make to climate change will inevitably be very small. Whilst the generating capacity of the development is a material consideration, the weight which it should be accorded in this case is not sufficient to set aside the policy presumption against the development in terms of its locally adverse environmental impact.

In summary, the benefits of the development for the environment are small in this case whilst the impacts of the development upon its sensitive surroundings are significant. Any advantages in terms of climate change considerations are therefore insufficient to offset the identified shortcomings of the proposal.