

This report is a recommended response to the Scottish Government's Energy Consents Unit (ECU) consultation on the Section 36 Consultation for Giant's Burn Wind Farm, comprising five turbines up to 200 m tip height, two turbines up to 180 m tip height, a battery energy storage system, and associated infrastructure. The turbines will have a combined rated capacity of over 50 MW; and the battery energy storage system will have a rated power of approximately 23 MW giving a total site capacity of over 73 MW.

Reference No: 25/01342/S36/ ECU00005007
Applicant: GB Wind Farm Ltd
Proposal: S36 Consultation: Giant's Burn Wind Farm, comprising five turbines up to 200 m tip height, two turbines up to 180 m tip height, a battery energy storage system, and associated infrastructure.
Site Address: Approx. 1.3km North West of Dunoon

(A) THE APPLICATION

The Section 36 Application comprises the following key elements:

- Seven variable pitch (three bladed) wind turbines, five each with a maximum blade tip height of up to 200 m and two up to 180 m;
- It is anticipated that three of the turbines (T1, T3 and T7) will be fitted with visible aviation warning lights;
- turbine foundations (up to 25 m diameter) and a crane hardstanding area and a temporary blade laydown area, tower and nacelle storage (approximately 4,313m²) at each wind turbine;
- BESS with a rated power of approximately 23 MW and energy storage capacity of 53 MWh
- up to 6.4 km of new on-site access track with a typical running width of 5 m (wider on bends) and 3.8 km of upgraded existing access track (widened from 2.5 m to minimum 5 m & wider on bends) and associated drainage, three turning heads and nine passing places;
- underground cabling and electrical infrastructure along access tracks to connect the turbine locations, and the on-site electrical substation;
- one on-site substation compound (40 m x 25 m) which would accommodate a control building for the Scottish and Southern Energy Networks (SSEN) substation and the wind farm substation;
- one temporary secondary construction compound (50 m x 100 m);
- one main construction compound for the Applicant (50 m x 100 m);
- clearance of 32.94 ha of on-site forest with 21.68 ha to be felled for peatland restoration and restocking of approximately 13.57 ha

The generation capacity of the wind turbines will be over 50MW and the capacity of the BESS will be 23MW. Permission is sought to operate the proposal for a period of 50 years.

Connection to Electricity Grid - The grid connection point is subject to confirmation by the network operator. It is current anticipated that the Proposed Development will connect to Dunoon substation, with the precise route of the grid connection cabling having not yet been determined. The grid connection application will be made by Scottish and Southern Energy Networks (SSEN) who

are responsible for the transmission and distribution of electricity in Argyll and Bute. A separate Section 37 application will be made to the Scottish Ministers by SSEN.

(B) RECOMMENDATION:

That the ECU be notified accordingly that:

- (1)** Following advice from NatureScot, Loch Lomond and the Trossachs National Park Authority and the Council's Landscape Consultant Argyll and Bute Council **object** to the proposal on **landscape and visual impact grounds**, as the proposed wind farm would result in extensive significant adverse landscape and visual effects, contrary to NPF4 Policy 11, NPF Policy 4 and LDP2 Policy 30.
- (2)** Following advice from SEPA and NatureScot Argyll and Bute Council **object** to the proposal on **deep peat and priority peatland habitat grounds**, as there are significant outstanding matters contrary to NPF4 Policy 11, NPF Policy 4 and LDP2 Policy 30, 73 and 79. Should this matter be satisfactorily resolved between ECU and SEPA and NatureScot, the Council's objection would be withdrawn. Should this issue not be resolved the Council would defer to SEPA and NatureScot (or any other body appointed by the ECU to provide expert guidance on this matter) in the event of an examination by the DPEA.
- (3)** Argyll and Bute Council **object** to the proposal on **Peat Landslide Hazard Risk Assessment** as there are significant outstanding matters contrary to NPF4 Policy 11, NPF Policy 4 and LDP2 Policy 30 and 79. The applicant has not provided an updated report as requested by the ECU. Argyll and Bute Council **object** unless this issue is resolved to the satisfaction of Ironside Farrar prior to the determination of this application by the ECU. Should this issue not be resolved the Council would defer to Ironside Farrar (or any other body appointed by the ECU to provide expert guidance on this matter) in the event of an examination by the DPEA.
- (4)** Following advice from Historic Environment Scotland (HES), Argyll and Bute Council **object** to the proposal the based on **cultural heritage impacts** as there are significant effects on the setting of the Scheduled Monument Dunoon Castle and inconclusive effects on other scheduled monuments contrary to the provisions of NPF4 Policy 7 and LDP2 Policy 19. Should this matter be satisfactorily resolved between ECU and HES the Council's objection would be withdrawn. Should this issue not be resolved the Council would defer to HES (or any other body appointed by the ECU to provide expert guidance on this matter) in the event of an examination by the DPEA.
- (5)** Following advice from NATS and Glasgow Airport, Argyll and Bute Council **object** to the proposal the based on **aviation impacts contrary to NPF4 Policy 11 and LDP2 Policy 30 and 43**. Should this matter be satisfactorily resolved between ECU and NATS/Glasgow Airport the Council's objection would be withdrawn. Should this issue not be resolved the Council would defer to NATS/Glasgow Airport (or any other body appointed by the ECU to provide expert guidance on this matter) in the event of an examination by the DPEA.

- (6) Argyll and Bute do not object on noise impact grounds, subject to the inclusion of an Operational Noise and Amplitude Modulation Planning Conditions, as recommended by the Council's Noise Consultant, Mott MacDonald, specified in their Review of Evidence – Noise, dated January 2026.
- (7) Argyll and Bute Council do not object on Public Access grounds, subject to the inclusion of a condition requiring the developer to prepare an Access Plan for approval by the Council prior to the commencement of construction.
- (8) Argyll and Bute Council do not object on Roads grounds, subject to the inclusion of relevant conditions, as specified by Argyll and Bute Council's Roads Service and Transport Scotland in their consultation response to the ECU.
- (9) Argyll and Bute Council requests that the recommendations of the Council's Local Biodiversity Officer and NatureScot are considered by the ECU. Specifically with reference to the need for mitigation (turbine feathering) for bats and surveys and mitigation for migratory salmonids, should consent be granted.
- (10) Argyll and Bute Council requests that all other conditions recommended by consultees are included in any Consent, should it be granted.

(C) CONSULTATIONS

RESPONSES TO THE ENERGY CONSENTS UNIT

NatureScot (27 November 2025): The location, size and scale of the Proposal would result in significant adverse effects on six Special Landscape Qualities (SLQs) of the Loch Lomond and the Trossachs National Park (LLTNP) and the experience of the Upper and Inner Clyde area. We advise that the Proposal may therefore not meet Policy 4 c) of National Planning Framework 4 (NPF4) due to the extensive nature of effects on the Argyll Forest area of the LLTNP and may not meet NPF4 Policy 11e (ii) due to the extensive and substantial nature of the effects on the distinctive Upper and Inner Clyde areas landscapes and seascape. We therefore **object** to this Proposal.

We offer advice only in relation to **peatland, ornithology and other natural heritage interests**. We recognise that onshore wind farms are designated as National Developments in NPF4 and understand their role in supporting the transition to a net zero economy. Whilst acknowledging the strong policy support for these types of development, as the location of these developments is not specified in NPF4, the impacts of individual proposals require to be considered on a case-by-case basis in keeping with wider NPF4 policies.

We advise that the nature and scale of the proposed development at this location are such that it cannot be accommodated without **significant adverse landscape and visual effects, including significant adverse effects and night-time effects** on the Argyll Forest area of the LLTNP and the Upper and Inner Clyde area. We consider that given the proposed siting, scale and type of development, it would not be feasible to overcome the significant adverse effects identified within the site parameters.

The site comprises part of a wider area of upland summits and plateaux close to the coastal edge of the Firth of Clyde which plays an important role forming in part skylines experienced from within the Argyll Forest, across much of the Upper and Inner Clyde area.

The location, size and scale of the proposed development represents a step change in prominence and proximity of wind farms to the Argyll Forest area of the LLTNP and the settled Upper and Inner Clyde area. The Proposal would significantly adversely affect six SLQs of the LLTNP and the experience of the Upper and Inner Clyde area.

These impacts would be to a degree that would result in an evident and noticeable material change to the SLQs of the LLTNP such that the objectives of this designation and overall integrity would be compromised. The Argyll Forest is the only area of the LLTNP (or any national park in Scotland) with a marine element, and the Proposal would have a significant adverse effect on that element - notably the recognised marine gateway of the Holy Loch and its associated coasts. We consider that effects on the Upper and Inner Clyde area would be significant adverse and would result in a substantial change to this area.

While the turbine height and number could be reduced, accounting for the sites' location within hills behind Dunoon close to the sensitive coast which is intervisible from highly sensitive areas of the LLTNP, and across a widespread extent of the Upper and Inner Clyde area, it is considered unlikely that the significant effects identified could be notably reduced. We therefore consider that these effects are unlikely to be overcome through re-design or removal of turbines. Accounting for the anticipated significant adverse effects on the LLTNP, we advise that the proposed development may therefore not meet Policy 4 c) of NPF4 and may not meet NPF4 Policy 11e (ii) due to the extensive nature of the effects on the distinctive landscapes and seascapes of the Upper and Inner Clyde area.

Loch Lomond & Trossachs National Park Authority (24 November 2025): the National Park Authority objects to the proposal for the following reasons:

- (i) Significant change in scale and proximity of windfarm development to the National Park. The proposal would introduce a windfarm development of significant scale (up to 200m in height) close to (2.7km from) the National Park boundary.
- (ii) Significant adverse effects on the Special Landscape Qualities of the National Park. Such a large-scale wind farm in the open upland area within the Cowal Hills behind Dunoon will result in significant adverse effects on the Special Landscape Qualities of the National Park.
- (iii) Significant effects on visual amenity. The wind farm would be a dominant feature that would have a significant adverse impact upon the open views and visual amenity for residents, visitors and recreational users in the southwestern area of the National Park.
- (iv) Significant effects on landscape character. The windfarm will have significant adverse effects on the landscape character of the Steep Ridgeland and the adjacent Mountains Glens Landscape (Landscape Character Type 4) covering Strath Eachaig, Kilmun, Strone, and southern edge of Loch Eck.
- (v) The proposal is contrary to National Planning Framework 4, Policy 4 Natural Places part c). The location, scale, type and proximity of the windfarm to the National Park boundary will compromise the objectives and integrity of the designation and the significant adverse effects are not

outweighed by any social, environmental or economic benefits of national importance.

The National Park's Landscape Assessment concludes that the nature and scale of the proposed development at this location is such that it **cannot be accommodated without significant adverse landscape and visual effects**. This includes significant adverse day time effects and night-time effects on the Argyll Forest area of the National Park. It is assessed that given the proposed siting, scale and type of development, it would **not be feasible to overcome the significant adverse effects** identified within the site parameters. The National Park does not consider that there is any option for mitigation of the development's impact.

The introduction of turbines of this scale and in this proximity and location to the National Park boundary, would significantly and adversely affect the experience, enjoyment and perception of several SLQs. These SLQs are recognised and valued and are integral to defining the National Park character, scenic value and sense of place. This would undermine the integrity of the National Park designation.

The National Park's assessment is aligned with NatureScot's assessment of the proposal with the exception of the conclusion of the significance of adverse effects in relation to Special Landscape Quality 15 'The seaside architecture of Kilmun and Blairmore'.

The proposed Giant's Burn windfarm would be of significant scale and proximity to the southwest boundary of the National Park. The proposed development would have a significant adverse effect on several of the Special Landscape Qualities within the Argyll area which are integral to the National Park designation. The proposed location, so close and prominent to the National Park boundary will compromise the integrity of the National Park designation.

It would have a significant adverse impact upon the open views and visual amenity for residents, visitors and recreational users of the National Park including the experience of the Upper and Inner Clyde seascape - the marine gateway to the National Park.

Given significant adverse effects on the National Park and its special qualities it is considered that the proposed development does not comply with NPF4 Policy 4 'Natural Places' c) which is clear that development will only be supported where the objectives of the designation and the overall integrity of the National Park will not be compromised. It also does not comply with NPF4 Policy 11 (Energy) e) ii. due to the extensive (more than localised) nature of the effects on the distinctive landscapes and seascapes of the Upper and Inner Clyde area that cannot be mitigated.

The significant adverse effects that the proposal will have upon the Special Landscape Qualities for which the National Park has been designated are not outweighed by social, environmental or economic benefits of national importance. the National Park Authority **object** to the proposal.

RSPB Scotland (23 January 2026) – advised the ECU they have no comment.

SEPA (Scottish Environment Protection Agency) (20 October 2025): Policy 5d of National Planning Framework 4 requires that where development on peatland,

carbon-rich soils or priority peatland habitat is proposed the detailed site-specific assessment should inform careful project design and ensure, in accordance with relevant guidance and the mitigation hierarchy, that adverse impacts are first avoided and then minimised through best practice. We do not consider that enough baseline peat probing has been carried out to inform the layout, and where peat probing information is available it is not always clear that the mitigation hierarchy has been applied.

As a result we **object** until the following issues are addressed:

1. Peat probing is carried out in the area impacted by the proposed Upgraded Access Track. This is required to inform the peat disturbance calculations.
2. Peat probing is carried out in the area of new access track and large passing place at the north of the site. This is required to demonstrate that the proposed route applies the peat mitigation hierarchy and minimises impacts on peat and carbon rich soils, and to inform the peat disturbance calculations.
3. The layout clearly demonstrates that the mitigation hierarchy has been applied. While it is acknowledged, as outlined in section 3.2 of the Peat Management Plan, that areas of deeper peat are sporadic and localised, it is not clear that suitable steps have been taken in the design of the layout to avoid the deepest areas of peat. For example the following require further consideration:
 - (1) T2 is located on some peat in the > 3m category, but shallow peat is located to the south and east. Designing the layout so that this turbine was online rather than on a spur track would also reduce excavation and likely peat disturbance.
 - (2) T3 and T4 both impact on small areas of peat > 3m deep and have a large earth work envelope where, in the case of T3 there is limited peat probing information.
 - (3) The BESS Units and Control Building are located on peat that is mostly in the > 1m depth yet most of the site to the east has shallower peat/peaty soils.
 - (4) The Construction Compound impacts on peat in the 2-3m and 3+m category. Changing its shape or moving it southeast would remove or at least reduce this impact.
4. Where it is clearly demonstrated that all potential steps have been taken to avoid the areas of deepest peat then mitigation measures such as floating infrastructure can be acceptable if demonstrated to be technically achievable. For example, section 4.3 of the Peat Management Plan indicates that the Construction and BESS compounds will be floated, but it is noted that there is an approximate 10 m height difference across both sites so it is not clear how this would be achieved.
5. There is currently only one construction compound and significant site works will be needed before it will be accessible. It therefore seems likely that there will be a requirement for an additional construction compound near the entrance to the site and clarification on this issue is requested. If one is required, it should be added to the site layout and appropriate baseline peat information provided. Proposals for site reinstatement using peat should follow recognised best practice. We note that there are also proposals to use excavated peat in forest to bog restoration and cell bund creation, which will adhere to the Peatland ACTION technical compendium guidance on surface bunding where possible. As you know we no longer provide advice on peatland restoration and defer to NatureScot on this issue. Should NatureScot be of the view that either of these activities is not considered restoration then please reconsult us and we will provide further advice on this aspect of the proposal, which will likely be considered a waste disposal operation. Should the above issues be addressed we ask that the planning conditions in the Appendix below be attached to any consent if granted. If these

will not be applied, then please consider this aspect of the representation as an objection.

Applicant response: At the time of writing no response has been received from the Applicant.

Scottish Forestry (1 September 2025) – advised the ECU that further information should be provided in the Forestry Plan to demonstrate full compliance with the UK Forestry Standard especially regarding species and age class diversity. The Applicant should provide an assessment, as per the “Deciding future management options for afforested deep peatland,” to determine if the Priority Habitat restocking exemption applies. The Applicant should clarify the total area of woodland loss to ensure that the correct area of compensatory planting is applied. Compensatory planting for the woodland lost, other than that converted to Priority Habitat peatland, should be secured by a condition to any consent. It is not clear whether forest lost to new roads has been included in the woodland loss figure and this should be clarified.

The appropriate consenting route required to accommodate construction, including infrastructure and management felling, totalling 32.94ha and restocking of management felling areas and compensatory planting relating to permanent woodland loss would be the S36 consent. Any felling and restocking not required for the development should follow the usual consenting routes under the Forestry and Land Management (Scotland) Act 2018.

Applicant Response to Scottish Forestry (20 October 2025) – provided the following response to Scottish Forestry:

- The wind farm commitment to replant on site is limited to 7.39 ha which is less than 7% of the total Sandbank Forest Plan (FP) and Auchamore forest areas. The replanting will form part of the revised FPs which will adhere to the UKFS species and age class diversity.
- Confirmed proposed restocking includes 0.74ha native broadleaves in line with the UKFS minimum of 5% native broadleaves. The replanting with native broadleaved trees under the control of the wind farm would be from the Provenance Region 10 and Native Seed Source Zone 106.
- Confirmed 7.39 ha replanting on site with Sitka spruce and other conifer will meet UKFS requirements to not exceed 65% of any single species.
- Confirmed that for the proposed contiguous area of clear felling, a phased restocking plan spread out over 5 years to deliver age class diversity. The planned timing for felling for construction, governed by the grid connection date, is anticipated as 2029. Replanting would normally follow within two years therefore the wind farm replanting on site would be 2031. The adjacent areas were replanted in 2015 and 2022 so the age diversity should be achieved without spreading out the replanting of the relatively small 7.39 ha.
- Clarified the permanent woodland loss for the new access tracks and upgrading of existing tracks as follows: the total area of felling is noted at 32.94ha but Table 12.5 Felling for the Proposed Development (3.85+7.39+21.68=32.92) does not account for the 0.02ha of felling, where is this accounted for? Table 12.5 individual lines correlate to the GIS data however the total of 32.94 ha is a typographical error and as pointed out the total should be 32.92 ha.
- Clarified that the BES would demonstrate that the proposed Conversion of 21.68 ha of forest to peatland restoration is restorable to a functional Priority Peatland Habitat.

Historic Environment Scotland (HES) (11 September 2025) – advised the ECU that based on the information provided they object to the proposal because insufficient information has been provided and we are currently unable to reach a view on the potential effects of the proposed development including any mitigation measures which may be required to reduce any significant effects. We require the submission of additional wireline and photomontage visualisations to be able to fully understand and assess the potential effects on the setting of the following assets:

- Dunoon Castle (Scheduled Monument SM5450)
- Ardnadam, settlement, chapel and enclosure (Scheduled Monument SM3235)
- Adam’s Cave Chambered Cairn (Scheduled Monument SM6552)
- Ardgowan House, Inverkip (Category A Listed Building LB12480)
- Ardgowan (Inventory Garden & Designed Landscape GDL00021).

Applicant – Further information to HES (14 November 2025) - the Justification Note provided to the ECU contains plans showing adjusted locations, with reduced peat impacts, of the infrastructure identified in SEPA’s response. The adjusted infrastructure locations are all contained within micro-siting allowances assessed as part of the S36 application and so no additional environmental impacts requiring assessment result.

Further Response by Historic Environment Scotland (HES) (16 January 2026)

We have reviewed the additional information supplied in the consultation letter dated 14 November 2025, along with its accompanying visualisations. On this basis, we are now content that there are unlikely to be any significant adverse impacts on the setting of Ardgowan House, Inverkip (Category A Listed Building LB12480), and Ardgowan (Inventory Garden & Designed Landscape GDL00021). In addition, we are of the view that although there are likely to be significant adverse impacts on the setting of Dunoon Castle (Scheduled Monument SM5450), our own assessment of these impacts are that these are unlikely to be of the magnitude that we would object. However we maintain our earlier stated position on the following assets:

- Ardnadam, settlement, chapel and enclosure (Scheduled Monument SM3235)
- Adam’s Cave Chambered Cairn (Scheduled Monument SM6552).

We **maintain our objection**. This is because **insufficient information** has been provided for the two scheduled monuments identified above, and we are unable to reach a view on the potential impacts of the proposed development including any mitigation measures which may be required to reduce significant effects. On receipt of additional visualisations, we will revisit our position.

Transport Scotland (TS) (26 August 2025): advised the ECU they have no objection subject to conditions being attached to any consent to secure submission and approval of a Construction Traffic Management Plan (CTMP), the route for abnormal loads, abnormal load accommodation measures required, and any necessary additional signing or temporary traffic control measures. In addition, advisory notes are provided relating to works within the trunk road boundary.

Argyll District Salmon Fishery Board (ADSFB) (25 August 2025): ADSFB note the likely presence of brown trout and European eel within the development site. pre (baseline), during and post construction surveys are proposed as per Marine Directorate’s guidelines. While we welcome this approach, we feel that it is important that the monitoring program includes the spawning and nursery habitats of migratory fish populations (Atlantic Salmon and Sea Trout) known to be present

in the Glenkin Burn and Little Eachaig. Atlantic salmon is now considered by IUCN to be an endangered species in Great Britain and therefore should be a priority for ensuring that no adverse effects of the development occur and if detected during and post construction that suitable and effective mitigation or repair is undertaken by the developer. We therefore **strongly recommend that surveys of migratory salmonid fish** and their habitat are undertaken and fully considered throughout the proposed development and that the monitoring program demonstrate that the interests of Argyll DSFB have been protected.

Scottish Water (23 January 2026) – advised the ECU they have no objection and there are no surface water and drinking water protected areas that may be affected by the proposed activity.

Ironside Farrar, Peat Landslide Hazard Risk Assessment (PLHRA), Stage 1 Checking Report (PLHRA) (14 November 2025): advised the ECU The PLHRA required resubmissions as there are significant shortcomings throughout the PLHRA and reworking of the PLHRA report is required to support a robust assessment.

Applicant response: At time of writing no updated report has been received from the Applicant.

Defence Infrastructure Organisation (DIO) (21 August 2025): advised the ECU that, subject to the conditions to secure Aviation Lighting and Aviation Charting and Safety Management, they have no objection.

NATS Safeguarding (1 August 2025): advised the ECU the proposal conflicts with their safeguarding criteria. Accordingly, NATS (En Route) plc objects.

Applicant response: At the time of writing no response has been received from the Applicant.

Glasgow Prestwick Airport (GPA) (25 July 2025): advised the ECU they have no objection.

Glasgow Airport (GLA) (1 September 2025) – advised the ECU proposed development has been examined from an aerodrome safeguarding perspective and conflicts with safeguarding criteria. Located approximately 36km from the Aerodrome Reference Point, turbines of up to 200m high in this location are predicted to be visible to Glasgow radar and will therefore generate unwanted returns (clutter) on air traffic control display screens. GLA therefore **objects** to the proposal. However it is noted that the proposed development may benefit from an approved mitigation technology

(Terma). This could allow our objection to be removed, but is subject to:

- specific technical and operational evaluation by Glasgow Airport;
- formal agreement between the Glasgow Airport and the applicant

Applicant response: At the time of writing no response has been received from the Applicant.

Highlands & Islands Airport (13 August 2025): advised the ECU the proposal is outwith HIAL's safeguarding criteria and therefore they have no objection.

BT Group (1 August 2025): advised the ECU this proposal should not cause interference to BT's current and presently planned radio network. BT requires 100m minimum clearance from any structure to the radio link path.

Joint Radio Company (27 August 2025): advised the ECU the proposal is cleared subject to 50m micro-siting with respect to radio link infrastructure operated by the local energy networks.

Kilmun Community Council (25 August 2025): advised the ECU they **object** on the grounds of Improper site selection and design, with no justification for locating turbines and BESS infrastructure in a sensitive upland area adjacent to residential zones and panoramic viewpoints. Concerns raised about:

- Excessive landscape and visual harm, including skyline breach and visual domination,
- Failure to protect biodiversity and carbon-rich peatland, with no credible enhancement strategy,
- Incomplete assessment of hydrology, flood risk, and peat disturbance,
- Unresolved and serious public health hazards from noise, shadow flicker, and low-frequency sound.
- High-risk, unregulated BESS component with no fire control or emergency response plan,
- Unfeasible and unsafe transport access, placing public infrastructure and road safety at risk.

Argyll and Bute Council Consultee Responses

Gourock Community Council (28 August 2025) – advised the ECU and ABC that they **object** due to the impact of the gigantic turbines on our iconic view of the Cowal Hills from Gourock's shores. Impact on tourism and 95 cruise ship visits per year – shared tourism important to both Gourock and Dunoon communities. Damage to peat and wildlife (including bats and raptors), potential community impacts, noise, health concerns, aviation safety. Express disappointment that Statkraft omitted GCC from the list of exhibition venues, despite the impact from McInroy's Point.

Consultant Landscape Architect (30 September 2025): This proposal would have significant effects on landscape/ seascape character including:

- the host ABLWECS Steep Ridgeland and Mountains LCT which extends to the Firth of Clyde Coast and includes Dunoon;
- the adjacent Mountain Glens around Holy Loch LCT, 1.4 km north-east of the turbines wraps around the head of Holy Loch, extends north into LLTNP toward Loch Eck and includes the settlements of Sandbank, Kilmun and Strone; and
- the Inner Firth of Clyde Seascape Character Area, which extends east along the Clyde from Holy Loch and Dunoon.

There would also be **significant** effects on views from locations within the above areas, notably the settlements of Dunoon, Sandbank, Kilmun and Strone and from ferries and recreational craft in the Firth of Clyde.

The site is close to the LLTNP. Whilst the LVIA states that effects on its SLQs would not be significant it records **significant adverse visual effects for locations within the park** including the waterside villages of Kilmun and Strone, both of which enjoy open views across Holy Loch to the Cowal Peninsula, uninterrupted by existing or

consented windfarm developments. The LVIA includes an assessment of the effects of the proposal on the SLQs of LLTNP, but considers the existing Inverclyde Wind Farm to reduce the sensitivity of the receiving landscape to the proposal rather than adding to its cumulative effects, stating 'The more accessible areas of LLTNP closer to the Site mostly already have views out across the water towards the settlements, ports and Inverclyde Wind Farm on the south side of the firth.

The LVIA states that the proposal performs well against three of four design criteria set out for the host landscape type in the ABLWECS. However, importantly ABLWECS states that 'The introduction of wind farms and larger turbines seen on the skyline of the Steep Ridgeland and Mountains ...' would adversely affect the strong sense of Cowal forming the threshold to the 'Highlands' and the point where the Glasgow conurbation is left (this perception heightened by the ferry crossing to Dunoon). The present contrast of the landscapes of the Cowal with the more developed Inverclyde and North Ayrshire coast would be diminished.' **Significant** visual effects are predicted in the LVIA for:

- Sandbank (VP01 and Illustrative Views A-E in Appendix 5.3)
- Dunoon (VP02 and VP03 and Illustrative Views F-I in Appendix 5.3)
- Kilmun and Strone (Illustrative Views J-K in Appendix 5.3, VP04)
- Ferry routes between Gourock and Dunoon/Hunter's Quay (VP03, VP14 and View L in Appendix 5.3)
- Recreational water users between Gourock, Kilcreggan and Dunoon and within Holy Loch (VP03, VP09, VP14, VP15, VP16 and Views J-L in Appendix 5.3)
- Local roads and Core Paths between Sandbank and Loch Eck (VP06)
- Users of Core Paths within 2km (Illustrative View D along High Road in Appendix 5.3)

The LVIA does not predict significant effects on views from the Inverclyde and North Ayrshire coastline despite open visibility to the proposal on the skyline of the Cowal Peninsula across the Firth of Clyde, and the absence of other wind farm developments visible from these locations. The visual assessment predicts that visual effects experienced from the A815 which follows the coast around Dunoon and Sandbank would be not significant, despite clear close views to turbines. Although the visual effects on residents of and visitors to Kilmun and Strone are assessed, the effect on travellers on the A880 along the coast within the LLTNP with open views across Holy Loch to the proposal are not assessed.

Three of the proposed turbines would have aviation lights at hub height, however the night-time visual effects are predicted to be not significant in the context of other artificial light sources. From a review of the photomontages the layout design of the proposed wind farm appears to have been carefully considered, with limited 'stacking' of turbines and balanced overall composition, such that removal or relocation of the proposed turbines are unlikely to reduce impacts. The scale of the turbines is such that they tend to diminish the apparent scale and distance of the hills when seen from across Holy Loch and the Firth of Clyde to the east and southeast.

Applicant response to Council's Landscape Consultant (summary of letter 29.1.2026): The response sets out: *'paragraphs 1 and 2 on page 8 acknowledge that the LVIA and visualisations meet guidance and that the assessment findings are largely agreed with. Given this, the criticisms that follow should be regarded as minor matters. Further clarification is provided on the limitations of ZTVs which include the modelling of forestry and noting that there is no guidance requiring such limitations to be 'declared' on the ZTV figures themselves'*. Further commentary is provided on methodological approaches taken to sequential assessment for users of primary recreational routes and cumulative assessments for the Dunoon Overhead

Line/removal of dead larch. The response reiterates that NPF4 policy indicates that *'significant landscape and visual impacts...are to be expected for some forms of renewable energy.'*

In relation to ABLWECS it is asserted that: *although the guidance advises not siting wind farms on the Cowal Peninsula, the landscape quality it is seeking to protect would not be notably affected.* In relation to townscape effects, the response confirms that effects on the character of the settlements are considered as part of considering effects on the relevant LCTs.

In relation to the LLTNP it states *'At no point does the Jacobs report disagree with the findings of the LVIA in relation to these locations and thus the description of significant visual effects as being 'considerable' is inaccurate. In addition, effects on people travelling to the National Park via Dunoon and Hunter's Quay are not visual effects on people in the National Park and should not be considered as such.'*

In relation to the Bute and South Cowal LLA and the West Renfrewshire LLA it is noted that - *comment made regarding Inverchaolain Wind Farm potentially giving rise to significant cumulative effects on the LLA are not relevant to the Proposed Development and should not be included in the Jacobs report.*

In relation to visual effects: *The broad description of the "settled coasts of Inverclyde and North Ayrshire" encompasses quite a large area, however it is assumed that the focus of any difference of opinion is whether the changes to the closer views from Gourock and Inverkip would potentially be significant. Given the comment on page 4 of the Jacobs report that effects are "perhaps understated", this appears to be a minor difference of opinion...visual effects at Strone Hill would be significant based on the EIA Report.*

In relation to Residential Visual Amenity Assessment: *Page 16 of the Jacobs report relating to 'notable' significant effects on residential receptors beyond the RVAA study area is incorrect should be disregarded. As set out in the relevant guidance (Landscape Institute TGN 02/19 Residential Visual Amenity Assessment (RVAA)) at paragraph 1.6:"It is not uncommon for significant adverse effects on views and visual amenity to be experienced by people at their place of residence as a result of introducing a new development into the landscape. In itself this does not necessarily cause particular planning concern."*

In relation to Cumulative effects: *Comments in the Jacobs report at both page 17 and page 8 paragraph 5 appear to suggest that an assessment of the total combined impacts of the proposed development with existing and consented wind farms should be provided, based on an interpretation of the wording in part of the relevant NatureScot guidance. However, this interpretation is at odds with the more detailed advice provided later in the NatureScot guidance.*

In relation to Policy 71: *The LVIA and other reports provide supporting information (i.e. documentary evidence, expert reports) to the application and the application is accompanied by an LVIA as the policy requires.*

Council's Landscape Consultant further response (9.2.2026): The inclusion of forest within the ZTV modelling is not considered to comply with best practice for wind farm assessments. It's the first time I have come across its inclusion for a windfarm project. Bare ground ZTVs are the norm representing a precautionary approach to illustrate the 'worse-case'. The removal of diseased larch emphasises the unreliability of ZTVs including forest cover. Large-scale felling coups have long-term impacts. Forestry practice allows for 2 years to elapse between felling and restocking and it takes time for replanting to reach 15m height. I would maintain that it is overly optimistic to include all existing

forestry in the ZTV. Especially since it would appear that some may already have been felled.

Disagrees that the difference is 'minor' as effects on views looking across the Clyde assessed as not significant may be significant. For example in my view effects at VPs 14 McInroy's Point and 15 Lunderston Bay would be significant.

Some sections of the LVIA lack clarity, for example the Significant effect at VP 23: Strone Hill is not reported in the main LVIA which misrepresents effects. The reason views from Dunoon and Hunter's Quay are referenced in our report is that they are on the approach to the LLTNP and are relevant to the journey from across the Firth of Clyde. I don't agree that the visual effects are not 'considerable'. The visual effects experienced at Strone and Kilmun alone would be considerable.

The LVIA uses the ABLWECS landscape Character Types as a basis for their assessment, so presumably the Applicant has some confidence in it. I would acknowledge that it should be treated with caution given its age and the growth in turbine size since its publication. However, it still provides the best available detailed landscape baseline information and guidance on sensitivities for the region and is referenced in LDP2 Policy.

I would not expect cumulative effects with Inverchaolain to carry weight in the decision making process for Giant's Burn, however, I think it important to highlight the potential for significant cumulative effects. If this proposal is consented, it would introduce wind farm development to the Cowal and could make it difficult to refuse further wind farm development on the Cowal.

In the case of Giant's Burn I would argue that significant effects would be more than localised, accepting of course that there is no definition of 'localised' in NPF4. Also it is hard to see how sufficient design mitigation has been applied, given the significance of the residual effects.

The information provided in the EIAR is not enough to fully convince me of no significant effects on the LLA. That is not to say that I believe that the effects would necessarily be significant.

West of Scotland Archaeology Service (WOSAS) – no response received.

Local Biodiversity Officer (22 October 2025): notes the proposed site is linked hydrologically to Holy Loch LNR / LNCS and may impact upon the qualifying features present and ancient woodland and native woodland are present on the site. **Ancient woodland** is irreplaceable habitat and cannot be compensated for. Due to the potential loss of native trees, tree surveys are requested prior to planning consent being granted, detailing the condition, location, species, age and biodiversity value of all trees on site. These should include bryophytes and lichens and the potential impact on these.

The proposed Turbines are sited on Class I and Class II peat with T2, T3 and T4 appearing to be sited on areas of **deep peat**. As per NPF4 Policy 5, the mitigation hierarchy should be adhered to, with areas of deep peat avoided in the first instance. Areas of potentially **High Dependent GWDTE** also appear to be impacted on. I ask that these areas are avoided.

Activity levels recorded as High, Moderate to High and Moderate for several species across the site including **European Protected Species and Protected Species (Bats)**. it would be advisable to reduce the rotation speed and monitor any fatalities that may occur from collision, as bats are found to forage within the wind turbine areas. Post-construction surveys are required to aid the monitoring process. This information will feed into further mitigation measures which can be altered accordingly to ensure any negative impacts to foraging / commuting bats is minimal. These need to be included in a **Species Protection**

Plan (SPP) to ensure mitigation measures are implemented to avoid negative impact and enhancement measures proposed.

Due to the transient nature of animals, I ask that **pre-works surveys** are carried out by a suitably qualified ecologist for other **European Protected Species including Otter, Badger, Water Vole, Red Squirrel and Pine Martin**. A **Species Protection Plan** will also be required for reptiles and amphibians which have been sighted.

No surveys have been submitted for **Fish and Freshwater Pearl Mussel or Invertebrates**. Due to the potential presence for SBL invertebrate species to be present on site, **pre-works surveys** should be carried out by a suitably qualified ecologist with guidance from Buglife.

The **cumulative effects of wind farms** are having a negative impact on bird species. Appropriate mitigation measures must be implemented to reduce potential impact of bird collision. Research has shown that painting one of the blades black can reduce fatalities. A programme of monitoring should be implemented with results provided to NatureScot, RSPB and Argyll Raptor Study Group. This information will feed into further mitigation measures which can be altered accordingly to ensure any negative impacts to birds is minimal.

Biodiversity Enhancement Management Plan (BEMP) is proposed but there will be a loss of 14.34ha of peatland habitat with 81.34ha compensation. This falls short of the 1:10 (loss:compensation) and 10% enhancement as per NatureScot guidelines. A **Deer Management Plan (DMP)** should be submitted. The use of fencing reduces connectivity and should be avoided where possible, but where fences are necessary, these must be marked appropriately and monitored to reduce collision impact to birds.

Applicant Response to Local Biodiversity Officer (4 February 2026) - note that many of the topics raised by the Council would be addressed in the final Biodiversity Enhancement Plan and Species Protection Plan where appropriate. Further information is provided as follows:

- the forestry to be felled all non-native conifer, (including first and second rotation forest crops) 0.36 ha of early (1930) non-native conifer planting are to be retained. Tree surveys are therefore not required.
- The non-native woodland does not have potential to be Atlantic rainforest (as it is too heavily modified) therefore it is considered that a pre-consent bryophyte and lichen survey is not required. Opportunities for riparian and non-riparian tree planting (including opportunities for expansion of Atlantic temperate rainforest are included in the BES).
- Discussions on peatland impacts are ongoing with SEPA, taking into consideration NatureScot's advice.
- An intentionally balanced approach to bats was taken resulting in an overall picture of Medium risk to individual bats. The Population Risk Assessment was undertaken for species of high population vulnerability and was concluded to be Low. Pipistrelle bats (86% of the calls) are not of high population vulnerability (excluding Nathusius' pip which comprised only 22 calls, vs 3500 of common and soprano pips combined). The consultation response suggests mitigation in the form of reducing rotation speed. However, guidance states, "Where there is little scope for avoiding areas of high risk through micro-siting or a reduction in the number of turbines, buffers and/or curtailment mitigation can be put in place". Buffers are already stipulated as a matter of best practice, but the proposed development area is not high risk, therefore the suggestion for additional mitigation that would affect energy generation is not strongly supported by the guidance and therefore there are no plans to curtail the individual turbines. No curtailment is

proposed at this site, however post-construction monitoring could be included in the detailed BEP post-consent, to be agreed prior to construction in order to improve understanding of bat activity in the area.

- Pre-construction surveys for otter, badger, water vole, red squirrel and pine marten, these are all already committed to within Chapter 6 Ecology.
- Reptiles and amphibians will be included in the SPP.
- Neither NatureScot or the Argyll and District Salmon Fishery Board have requested surveys for fish and fresh water pearl mussels and due to no concerns being raised, the applicant does not think it is necessary to include them as part of this application.
- The applicant will commit that prior to construction; the BEP will be updated to include pre-works survey to be undertaken in line with recommendations from Buglife.
- To address overgrazing current forest areas will have a deer management plan which would be updated as a result of the development. The applicant will commit to this being expanded to be within the BEP, to be agreed post-consent.
- The request for bats, reptiles, amphibians and potentially invertebrates to be included within the SPP is standard and can be agreed within a condition

Officer response: Argyll and District Salmon Fishery Board **strongly recommend surveys of migratory salmonid fish** and their habitat are undertaken and fully considered throughout the proposed development and a monitoring program is implemented. Given the identified presence of brown trout parr in Birchen Burn any agreed mitigation measures should be implemented. The NatureScot response sets out *'we would advise that as a minimum feathering of the turbine blades below cut-in speed is implemented at this site'*). NatureScot guidance notes – *'The reduction in speed resulting from feathering compared with normal idling may reduce fatality rates by up to 50%. As this option does not result in any loss of output, as best practice, it is recommended wherever it is practically possible and there remains uncertainty over the risk posed to bats'* Officers will request this be secured by planning condition should the proposal be granted consent by Scottish Ministers.

Noise Consultant (September 2025) - conclude that, in general, good practice has been adopted by the Applicant, however the following aspects require further consideration:

- Measured background sound levels appear to have been strongly affected by watercourse noise such that noise limits derived as a function wind speed are weakly correlated to wind generated noise. Consequently, two options are suggested:
 - Further measurements are undertaken at locations that are representative of the sensitive receptors but are less affected by watercourse noise and new noise limits are derived and used to assess noise impacts
 - A fixed limit of 37.5 dB LA90 is applied at all wind speeds during the day and night-time periods
- Confirmation of the absence of derelict buildings with permission for residential development should be confirmed. A single building approximately 500 m south of Strensaul Cottages is visible on aerial imagery but is not considered by the assessment
- Confirmation that the application of serrated trailing edge to the blades of all turbines is commitment of the project design
- Confirmation of the turbine hub height of the project design and that the noise modelling has considered this
- A rain gauge was installed at position given as 'MP3' although this position is undefined in the reporting
- The resolution of the graphs showing the prevailing background noise and scatter plot makes it difficult to tell which data was excluded or retained. It is requested that the

Applicant addresses these points before the suitability of the assessment and significance of the noise impacts can be considered.

Potential draft planning conditions also proposed on Operational turbine noise, Amplitude modulation, Proposed operational turbine noise condition.

Applicant's response to Noise Consultant (October 2025) – provided further clarifications and confirmation on data collection/survey methodology as requested.

ABC Noise Consultant (January 2026) - Following further clarifications from the applicant, it is now considered that there are no reasons to refuse the application on noise grounds, subject to the imposition of noise conditions as set out in Appendix A of the submitted advice report.

ABC Roads and Infrastructure Services (RIS) (26 January 2026) – At this stage we have insufficient detail to make proper evaluation from a roads perspective and as such give general instruction. The Construction Traffic Management Plan (CTMP) is required to evaluate the proposals and address a number of points, including:

- Concerns over the 'straight' section leading on to the exit/B836. We assume the straightening is to allow for abnormal load movement, however for other traffic we have concern over the speed of vehicles/run off onto the B836.
- The visibility splays provided to west/left of exit to B836 are in excess of the 136m required. Obstacles to visibility, particularly to the west require detail as to how they would be overcome.
- The junction onto the B836 shows a proposed widening but does not take into account overcoming the dip in gradient to the west nor the telecoms pole that would require relocation.
- Detail of the road width/passing places on the access road, particularly near entrance e.g. to prevent queuing
- Confirmation of borrow pit use/concrete batching on-site or sourced from off-site
- Location of wheel washing/inspection areas
- Services access locations
- Detail on entrance/exit onto public road – access width, design etc
- Width of access road

Conditions are suggested to provide an agreed Construction Transport Management Plan (CTMP) including points as above; Provide notice of proposed route details for abnormal loads for approval including any require street furniture removal, temporary widening etc.; Access road entrance to standard required in our Roads Development Technical Guidance including drainage and prevention of water/objects onto the public road.

Flood Risk Assessor (30 January 2026) – no objection subject to conditions to ensure any proposed watercourse crossings are designed to convey the 1 in 200 year plus climate change flood event and that surface water drainage is designed in accordance with CIRIA C753 and ensure that post development surface water runoff does not exceed the pre-development surface water runoff. The surface water drainage should be in operation prior to the start of construction.

Access Officer – no response received.

Please note: the above are summaries and the full consultee responses can be viewed on the Energy Consent Unit and Argyll & Bute Council websites.

(D) HISTORY:

24/00397/SCOPE - Scoping opinion for proposed Section 36 application for Giant's Burn Wind Farm – Opinion issued 4 April 2024.

24/01926/PP - Erection of a 120 metre high meteorological mast for a temporary period of up to 4 years

24/01926/DOC01 - Request to discharge conditions relative to application 24/01926/PP. Specifically condition 5.

24/01926/DOC02 - Request to discharge conditions relative to application 24/01926/PP. Specifically condition 3.

09/00569/DET - Strone Saul Hill Dunoon, Construction of wind farm comprising eight turbines, anemometer mast, upgraded access track, internal tracks and ancillary development – REFUSED/APPEAL DISMISSED

(E) PUBLICITY:

As the Council is not the Determining Authority the ECU oversees the Publicity of the application.

Public Consultation – Whilst not a statutory requirement for S36 applications, the Applicant has undertaken Public Consultation. Two periods of public exhibitions were held, in April 2024 and April 2025. The in-person events were held in Innellan, Dunoon, Kilmun and Cove in 2024 and Dunoon, Kilmun, Sandbank, Innellan and Cove in 2025. A summary of the representations received during the public exhibitions is provided in the submitted Pre-Application Consultation Report (June 2025) which is available on the ECU website (reference ECU00005007).

(F) REPRESENTATIONS:

As the Council is not the determining Authority the ECU considers any representations. At time of writing, they are in receipt of 928 representations in total of which 914 are objecting to the proposal, 3 are neutral and 6 are letters of support. The key issues for each representation type are summarised below:

Neutral

- Potential benefits to Sandbank, Benmore and Kilmun communities should this development proceed, including shared ownership with Cowal Community Energy.
- Profit retention from shared ownership would provide a vastly greater amount of financial benefit than the standard, recommended 'Community Benefit' payments.

Support

- Project will support grid constraints in the area.
- Additional onshore wind capacity is essential to meeting Scotland's legally-binding decarbonisation targets while reducing exposure to volatile wholesale markets.
- Giant's Burn is consistent with national policy, contributes materially to security of supply and net-zero delivery, and offers credible opportunities for local economic participation.

- It will bring economic benefits to the Cowal area and contribute to the net zero objective.
- Benefits for local communities.
- Appropriate site for renewables, close to grid connection point and communities.
- Potential for private wire connection to support local proposed data centre projects.
- Visual impacts will be minimal.
- Pollution and temporary construction impacts on peat can be controlled.

Object

Site and design

- Proposed development located in a sensitive upland landscape that overlooks Dunoon, Sandbank and the Holy Loch.
- Improper site selection and design, with no justification for locating turbines and BESS infrastructure in a sensitive upland area adjacent to residential zones and panoramic viewpoints
- Turbine array extends across an exposed ridgeline to the west of Loch Loskin, with prominent summits such as the Socach, Giants Knowe, Bishop's Seat, Big Knap and Eilligan forming a distinctive ridge.
- No alternative locations explored. Site unsuitable for large industrial structures.
- Exceptionally tall turbines are out of proportion with existing infrastructure.

Landscape and Visual Impact

- Highly prominent and exposed setting, where its scale and form are entirely disproportionate to the surrounding landscape.
- Excessive landscape and visual harm, including skyline breach and visual domination.
- Turbines would dominate approach to Dunoon by ferry, be clearly visible from key walking routes, core paths, tourist viewpoints and public roads.
- The height and location of the turbines will be an overbearing presence in the area. In Dunoon they will constantly loom large over the town.
- 200 metre high turbines placed on the tops of the hills above Dunoon would be visible for many miles around and would affect a large population, not only here in Cowal and Dunoon area but also in Inverclyde, Ayrshire, Kilcreggan, and Bute.
- Negative impact on LLA and LLTNP - "Maritime Gateway to the Highlands."
- The aviation lighting required for turbines of this height would severely impact dark sky quality, altering the nighttime landscape for over 11 hours a day.
- The proposed 200m tall turbines will significantly adversely alter the visual character of the area, representing industrialisation of the countryside.
- The proposed development is disproportionately large for the local landscape and situated too close to residential properties.

Tourism and Economic Impact

- Detrimental impact on the local tourism economy which relies on natural landscape.
- Turbines would be visible from walking and cycling routes, potentially affecting visitor experience and bookings.

- The development will have a detrimental impact on local tourism, including on B&B and accommodation providers.
- Impact on users of the Clyde including paddle steamers and cruise ships.
- Minimal long-term job creation.
- Economic benefits may not reach the local community.
- Financial incentives seen as inadequate compensation.
- Limited long-term local economic benefits; most jobs expected to be temporary.

Natural Heritage / Biodiversity Issues

- The EIA lacks a complete Phase 1 habitat map.
- Species surveys are limited in scope and timing, lacking year-round data or an understanding of seasonal variations.
- The assessment does not adequately address connectivity corridors, and the proposed layout seems to disrupt rather than preserve these crucial ecological links.
- Impact on the Holy Loch Nature Reserve including on recovering sea grass meadow and salt marsh communities as a result of run off.
- Impacts on red squirrels at the proposed entrance splay to the site.
- Impacts on amphibians and slow worms in Glenkin Forest.
- Impacts on Brown trout parr in the Birchen burn.
- Impacts on pine martin.
- Inadequately addresses contamination risks to land and water.
- EIA lacks robust mitigation strategies and does not acknowledge the challenges of managing such risks in steep, peaty upland areas.
- Significant loss of habitat and biodiversity.
- Increased flood and river pollution/contamination risk.
- Environmental Impact Assessment lacks site-specific detail.
- The site is home to rare and protected species: golden eagles, white tail eagles, ospreys, sea eagles, buzzards, hen harriers, marsh fritillaries, bats, owls, badgers, pine martens, otters and wild deer.
- The area includes peatland, which is sensitive and important for carbon sequestration.
- Flora and Fauna will be severely impacted.
- Fisheries have raised concerns about the local rivers.
- Loss of existing woodland.

Peat and Hydrology

- The loss of rich peatland habitat.
- located in an upland catchment with extensive peaty soils, active watercourses, and wet flushes. These features are crucial for the hydrological health of Loch Loskin, the Holy Loch, and the surrounding lowland water systems.
- Development layout places hard infrastructure like tracks, excavations, and turbine bases directly within hydrologically sensitive areas, without buffer zones or modelling of altered flow paths, sediment displacement, or erosion.
- Peatslide risk assessment is vague, noting that one third of the site may be hazardous, with generic mitigation proposals that do not offer site-specific solutions.

Infrastructure

- Lack of clarity on associated transmission lines and infrastructure.

- Traffic pressure on single-track roads during construction - 90% increase in Heavy Goods Vehicle (HGV) traffic on parts of the A815 and over 70% on the B836.
- No provisions are made for how residents along the A815 will manage the daily effects of construction traffic, noise, and potential access limitations.
- Vulnerabilities of A83 when transporting components.
- Significant construction and grid connection requirements.
- Risk of disruption to local roads and transport, which will need to be upgraded.
- Possible disruption/interference to telecommunications.
- The inclusion of a BESS facility adds further environmental and construction concerns which are not addressed through management plans.
- BESS presents an unacceptable and unmitigated fire and health risk.
- Pressure on local infrastructure during construction.

Planning Policy

- Inconsistency with earlier rulings and dismissed proposals.
- Contrary to the Argyll & Bute Local Development Plan (LDP2)
- Contrary to National Planning Framework 4 (NPF4)
- Contrary to the Argyll & Bute Landscape Wind Energy Capacity Study (2017)
- Does the site abide with the Electricity Act 1898?
- The site is in a landscape character type deemed unsuitable for turbines of 200m.
- Preference for Scotland should be hydro pumped storage energy.
- Conflicts with LLTNPA protections/SLQs

Cultural Heritage

- Potential harm to archaeological sites and sites of historical significance.
- Proximity to heritage sites in Dunoon and Kilmun
- Lack of on-site surveys.

Public Health and Amenity

- Concerns over noise, nuisance, and degradation of local amenity for current and future generations, including adverse impacts on resident's general and mental health.
- Effects of operational noise, shadow flicker, or low-frequency sound on nearby homes.
- Impact on Glenkin Cottage and private water supply.
- Statkrafts Noise survey has chosen to not take into account valley topography
- Shadow flicker during the day and turbine lighting at night could affect nearby homes and wildlife.
- Safety concerns regarding the proposed battery energy storage system, including fire and toxic emissions, and access to the site for the fire and emergency service.
- Concerns about health, including stress related illnesses, sleep disturbance, loss of tranquillity.
- The RVAA zone should be increased to at least 5 km to include all the nearby settlements.
- Adverse visual impacts from the many rural dwellings in this area, and from vessels in the Firth of Clyde, including ferries and sailing yachts.

- Adverse impacts on existing “Dark Skies”, due to proposed aviation warning lights.

Precedent

- Fears the approval could set a precedent for similar developments in inappropriate locations.

Sustainability of Wind Farms

- Questions the overall sustainability of wind farms due to high energy and resource demands during construction and decommissioning.
- Carbon footprint of construction and turbine disposal.
- Short operational lifespan may not justify long-term damage.
- Concerns over reliance on desktop studies.
- No safe way to recycle turbine blades.

Community Benefit

- Contend that there is no tangible benefit to the local community or economy.
- Devaluation of nearby properties and land.

Lack of Justifiable Need

- Argyll already exceeds renewable energy targets.
- This proposal is the product of commercial expediency.

Other

- Potential devaluation of nearby properties and those in Inverkip, Gourrock and Wemyss Bay.
- Is there capacity for grid connections for all the projects proposed?
- Limited consultation with local residents.
- Electricity cannot be effectively stored, and wind power is inconsistent.
- Statkraft already holds permissions for wind farms in remote uplands – Slickly, Andershaw, Twentyshillig Hill – yet many turbines there are still not built or running. Why should one of Scotland’s most iconic views across the Clyde be put at risk, when the company hasn’t even delivered on its existing consents in far more suitable locations.
- Wind farms in Scotland rely heavily on subsidy mechanisms (Renewables Obligation Certificates, and more recently Contracts for Difference). Studies show that up to half the income of onshore wind farms comes from taxpayer or billpayer support.
- According to the Renewable Energy Foundation, UK renewables subsidies now total £25.8 billion annually, with consumers already having paid over £220 billion since 2002 — ~£8,000 per household. New CfD contracts strike at £92–113/MWh, yet consumers must still cover the difference when wholesale prices fall.
- In the first half of 2025 alone, Scottish wind farms were paid £117 million not to produce electricity, representing 37% of potential generation (4 TWh) — enough to power every Scottish home for six months. Nationally, constraint payments to wind farms cost £810 million in H1 2025. Adding Giant’s Burn into an already saturated system means taxpayers will fund turbines that produce no usable energy.

Note: The comments raised above are addressed in the assessment of the proposal at Appendix A of this report, where relevant to the planning process.

Note: Please note that the representations above have been summarised, and the full letters of representation are available on the ECU website.

(G) SUPPORTING INFORMATION

Has the application been the subject of:

(i) Environmental Impact Assessment Report (EIAR): Yes

The EIAR (November 2024) comprises the following volumes:

- Volume 1: Non-Technical Summary (NTS): The NTS provides a non-technical overview of the EIA Report and is intended for review by the general public. It includes a description of the Proposed Development and a summary of the predicted environmental effects.
- Volume 2: EIA Report (EIAR)
- Volume 3: EIA Report Figures:
 - Volume 3a: Figures to support Chapters 1-15 of the EIA;
 - Volume 3b: Proposed Development Visualisations – Landscape Viewpoints 1 – 24 and Heritage Viewpoints 1 - 18; and
- Volume 4: EIA Report Technical Appendices

Key topics covered in the EIAR include:

- Chapter 1: Introduction;
- Chapter 2: Site Description and Design Evolution;
- Chapter 3: Description of the Proposed Development;
- Chapter 4: Approach to EIA;
- Chapter 5: Landscape and Visual;
- Chapter 6: Ecology;
- Chapter 7: Ornithology;
- Chapter 8: Geology, Hydrology and Peat;
- Chapter 9: Cultural Heritage;
- Chapter 10: Traffic and Transport;
- Chapter 11: Noise;
- Chapter 12: Forestry
- Chapter 13: Aviation;
- Chapter 14: Other Considerations; and
- Chapter 15: Schedule of Commitments.

In addition, the following documents are also provided in support of the application:

- Planning Statement (David Bell Planning, July 2025)
- Socio-Economic Benefits Report (Statkraft, June 2025)
- Peat Landslide Hazard Risk Assessment – Stage 1 checking report
- PreApplication Consultation Report (Statkraft, June 2025)

(ii) An Appropriate Assessment under the Conservation (Natural Habitats) Regulations 1994: NatureScot will advise the ECU

- (iii) **A Design or Design/Access statement:**
No
 - (iv) **Sustainability Checklists (with reference to the requirements of LDP2 Policy 04):**
Not required proposal accompanied by full EIAR.
 - (v) **A report on the impact of the proposal e.g. Retail impact, transport impact, noise impact, flood risk, drainage impact etc:** All relevant reports are encompassed within the EIAR.
- (H) **PLANNING OBLIGATIONS** **Is a Section 75 agreement required:** No
- (I) **Has a Direction been issued by Scottish Ministers in terms of Regulation 30, 31 or 32:** No
- (J) **Section 25 of the Act; Development Plan and any other material considerations over and above those listed above which have been considered in the assessment of the application**
- (i) **List of all Development Plan Policy considerations considered in assessment of the application.**

National Planning Framework 4 (Adopted 13th February 2023)

NPF4 Policy 1 – Tackling the Climate and Nature Crises
 NPF4 Policy 3 – Biodiversity
 NPF4 Policy 4 – Natural Places
 NPF4 Policy 5 – Soils
 NPF4 Policy 6 – Forestry, Woodland, and Trees
 NPF4 Policy 7 – Historic Assets and Places
 NPF4 Policy 11 – Energy
 NPF4 Policy 22 – Flood Risk and Water Management
 NPF4 Policy 33 – Minerals

Annex B – National Statements of Need

3. Strategic Renewable Electricity Generation and Transmission Infrastructure

Argyll & Bute Local Development Plan 2 (LDP2) (Adopted 2024)

Policy 02 – Outwith Settlement Areas
 Policy 04 – Sustainable Development
 Policy 15 – Protection, Conservation and Enhancement of Our Historic Environment
 Policy 16 – Listed Buildings
 Policy 19 – Scheduled Monuments
 Policy 20 – Gardens and Designed Landscapes
 Policy 21 – Sites of Archaeological Importance
 Policy 30 – The Sustainable Growth of Renewables

Policy 31 – Minerals
 Policy 35 – Design of New and Existing, Public Roads and Private Access Regimes
 Policy 43 – Safeguarding of Aerodromes
 Policy 55 – Flooding
 Policy 56 – Land Erosion
 Policy 57 – Risk Appraisals
 Policy 58 – Private Water Supplies and Water Conservation
 Policy 59 – Water Quality and the Environment
 Policy 60 – Private Sewage Treatment Plants and Wastewater Drainage Systems
 Policy 61 – Sustainable Drainage Systems (SuDS)
 Policy 62 – Drainage Impact Assessments
 Policy 63 – Waste Related Development and Waste Management
 Policy 70 – Development Impact on National Scenic Areas (NSA's)
 Policy 71 – Development Impact on Local Landscape Areas (LLA's)
 Policy 73 – Development Impact on Habitats, Species and Biodiversity
 Policy 74 – Development Impact on Sites of International Importance
 Policy 75 – Development Impact on Sites of Special Scientific Interest (SSSIs)
 Policy 76 – Development Impact on Local Nature Conservation Sites (LNCS)
 Policy 77 – Forestry, Woodland, and Trees
 Policy 78 – Woodland Removal
 Policy 79 – Protection of Soil and Peat Resources
 Policy 80 – Geodiversity

(ii) List of all other relevant planning considerations considered in the assessment of the application, having due regard to Annex A of Circular 3/2013

- Scottish Energy Strategy (2017)
- Onshore Wind Policy Statement (2022)
- Draft Energy Strategy and Just Transition Plan (2023)
- Good Practice Principles for Shared Ownership of Renewable Energy Developments, Scottish Government, 2019
- Onshore Wind Turbines: Planning Advice, Scottish Government (May 2014)
- The Argyll & Bute Landscape Wind Energy Capacity Study, 2017 (LWECS)
- [ABC Technical Note – Biodiversity \(Feb 2017\)](#)
- Landscape Institute and Institute of Environmental Management and Assessment – Guidelines for Landscape and Visual Impact Assessment, Third Edition (2013)
- Scottish Natural Heritage – Visual Representation of Wind Farms Guidance (Version 2.2, 2017)
- Scottish Natural Heritage - Siting and Designing Wind Farms in the Landscape Guidance (Version 3a, 2017)
- Historic Environment Policy for Scotland (2019)
- Scottish Government, Draft Planning Guidance: Biodiversity, 2023
- The Climate Change (Emissions Reduction Targets) (Scotland) Act 2024
- Managing Change in the Historic Environment
- PAN 1/2011: 'Planning and Noise' (March 2011)
- Scottish Government's Policy on 'Control of Woodland Removal' (Forestry Commission Scotland 2009)
- UK Forestry Standard (UKFS)
- PAN 60 – Planning for Natural Heritage (Jan 2008)
- Views of statutory and other consultees
- Planning history of the site

- Legitimate public concern or support expressed on relevant planning matters

- (K) **Is the proposal a Schedule 2 Development not requiring an EIAR:** No, an EIAR was required.
- (L) **Has the application been the subject of statutory pre-application consultation (PAC):** No - PAC is not required for S36 applications.
- (M) **Does the Council have an interest in the site:** No
- (N) **Requirement for a pre-determination hearing:** No
- (O) **Is the proposal consistent with the Development Plan:** No – due to identified extensive significant adverse landscape and visual impacts, significant cultural heritage impacts and unresolved deep peat and priority peatland habitat impacts. In addition, there are unresolved objections from SEPA, National Air Traffic Services, Glasgow Airport and outstanding matters in relation to Peat Landscape Risk Assessment. It is therefore not possible to determine whether the proposals are consistent with these elements of the Development Plan.
- (P) **Need for notification to Scottish Ministers or Historic Environment Scotland:**
No

Author of Report: Shelley Gould

Date: 30 January 2026

Reviewing Officer: Sandra Davies

Date: 9 February 2026

Fergus Murray
Head of Development & Economic Growth

APPENDIX A – RELATIVE TO APPLICATION NUMBER: 25/01342/S36

PLANNING LAND USE AND POLICY ASSESSMENT

COMMITTEE REPORT

PLANNING LAND USE AND POLICY ASSESSMENT

1. THE SECTION 36 CONSENTING REGIME

- 1.1 Any application for an onshore power generating station with an installed capacity of over 50 MW requires the consent of Scottish Ministers under S36 of the Electricity Act 1989. Any authorisation given includes a deemed planning permission. Consequently, there is no need for a planning application to be made to the Council. The Council's role in this process is one of a consultee.
- 1.2 The Development Plan is not the starting point for considering S36 applications. The reason for this is that sections of the Planning Act which establish the primacy of Development Plan Policy in decision making are not engaged. NPF4 and LDP2 form the Development Plan. Whilst they do not have primacy in S36 decision making, they remain an important consideration to inform the Council's consultation response.
- 1.3 Schedule 9 of the Electricity Act requires the Applicant and the decision maker to have regard to the preservation of amenity. It requires that in the formulation of proposals the developer shall have regard to:
 - (a) the desirability of preserving natural beauty, of conserving flora, fauna and geological or physiological features of special interest and of protecting sites, buildings, and objects of architectural, historical, or archaeological interest; and
 - (b) shall do what he reasonably can to mitigate any effect which the proposals would have on the natural beauty of the countryside or on any such flora, fauna, features, sites, buildings, or objects.
- 1.4 It obliges the Scottish Ministers as decision maker to have regard to the desirability of the matters at (a) and the extent to which the Applicant has complied with the duty at (b).
- 1.5 Assessment of the proposal against the policies of NPF4 and LDP2 will ensure that proper consideration is given by the Council to the extent that the proposal satisfies these Schedule 9 duties.
- 1.6 The Council can either support or object and recommend conditions to be imposed if Scottish Ministers grant consent. Previously, if the Council raised an objection to a section 37 or section 37 application, Scottish Ministers were obliged to hold a Public Local Inquiry (PLI) if they were minded to grant consent. On 30 January 2026 the Scottish Government published a letter to industry and planning authorities clarifying new processes around objections to applications for energy consent following the receiving of Royal Assent of the Planning and Infrastructure Act 2025 in December 2025. This letter clarifies that where a planning authority objects to an application and that objection is not withdrawn, or cannot be resolved by conditions or

modifications, a new reporter led examination process will apply. These changes come into effect on 18th February 2026 and will be applicable from that date. Reporters are appointed by the Directorate for Planning and Environmental Appeals (DPEA). If consent is granted it is presumed that the Council as Planning Authority will remain responsible for the agreement of matters pursuant to conditions, ongoing monitoring, and enforcement, however, further guidance is anticipated following consultation later this year.

- 1.7 This report considers the relevant policy considerations, planning merits, views of consultees and representations. It recommends views to be conveyed to the Energy Consents Unit (ECU) for consideration before a decision is made.

2. SPATIAL AND SETTLEMENT STRATEGY

- 2.1 Policy 02 – Outwith Settlement Areas establishes acceptable scales of development in three different zones. The site is located within Remote Countryside, which only supports specific categories of development. This includes renewable energy related development. In principle, Policy 02 supports renewable energy and ancillary development in these areas, providing they are consistent with all other relevant LDP2 Policies. With respect to the requirement for developments to accord with all other relevant policies, particular attention is drawn to Policies 70 to 76 with respect to landscape and the natural environment. Proposals must also demonstrate that there will be no unacceptable adverse effects (individual or cumulative) on natural heritage, built and/or cultural heritage, and landscape and visual amenity.
- 2.2 Policy 71 – Development Impact on Local Landscape Areas (LLA) - requires that proposals in or affecting a LLA must demonstrate that: a) any significant adverse effects on the landscape quality for which the area has been designated are clearly outweighed by social, economic or environmental benefits of community wide importance; b) The proposal is supported by a landscape and visual impact assessment and has taken account of the content of any relevant Argyll & Bute Landscape Capacity Assessment; and c) The location, scale, design, materials and landscaping would be of a high standard and would safeguard or enhance the special qualities and character of the LLA. The far western part of the site overlaps with the Bute and South Cowal Local Landscape Area which extends northwards and westwards to cover much of the Cowal Hills, and the Isle of Bute.
- 2.3 Policy 04 – Sustainable Development requires that in preparing new proposals developers should demonstrate the following sustainable development principles (where relevant) such as: maximise the opportunity for local community benefit; support existing communities and maximise the use of existing infrastructure and services; conserve and enhance the natural and built environment and avoid significant adverse impacts on biodiversity, natural and heritage assets; respect the landscape character of an area and the setting and character of settlements; avoid places with significant risk of flooding, or ground instability and avoid having significant adverse impacts on land, air and water environment. This application is supported by an EIAR which sets out in detail the measures proposed to ensure the proposal is 'Sustainable Development'.

2.4 Policy 11 – Energy of NPF4 and Policy 30 – Sustainable Growth of Renewables LDP2 provide the primary policy framework for assessing renewable energy proposals. In this case, due to consultee advice requesting outstanding information it is has not been possible to reach a conclusion on the peat/soils/biodiversity/aviation impact elements of the policy. Please see detailed policy assessment below.

2.5 **Having due regard to the above due to widespread significant adverse effects on landscape and visual impact and built and/or cultural heritage the proposal is not consistent with the relevant provisions of LDP 2 Policy 02 – Outwith Settlement Areas and LDP Policy 04 – Sustainable Development. Due to outstanding information relating to deep peat/priority peatland habitat/aviation and the need for an updated Peat Landslide Hazard Risk Assessment, it is not possible to determine whether the proposal is consistent with all relevant provisions of LDP 2 Policy 02 - Outwith Settlement Areas and LDP Policy 04 – Sustainable Development.**

3. ENERGY & SUPPORTING THE SUSTAINABLE GROWTH OF RENEWABLES

3.1 Argyll & Bute Council is keen to ensure that Argyll & Bute continues to make a positive contribution to meeting the Scottish Government’s targets for renewable energy generation. These targets are important given the compelling need to reduce our carbon footprint and our reliance on fossil fuels, reinforced by the Climate Change (Emissions Reduction Targets) (Scotland) Act 2019. The Council will support renewable energy developments where these are consistent with the principles of sustainable development, and it can be adequately demonstrated that there would be no unacceptable significant adverse effects.

3.2 This proposal has been assessed primarily against the two lead Statutory Development Plan policies relating to renewable energy, Policy 11 – Energy of NPF4 and Policy 30 – the Sustainable Growth of Renewables of LDP2. Other policies are referred to where relevant. It is noted that this proposal makes a comparatively small contribution of 50.4MW installed capacity and 23MW of BESS towards renewable energy targets. It is noted the proposal would theoretically generate enough electricity to power the domestic electricity needs of approximately 58,212 average UK households per annum.

4. LOCATION, NATURE, AND DESIGN OF PROPOSAL

4.1 The proposal site covers an area of approximately 700.6 ha and sits approximately 2.1km north-west of Dunoon on the northeastern side of Bishop’s Seat and Giant’s Knowe. The area is topographically complex and is characterised by several raised peaks such as Tom Odhar (256m AOD) to the west, and Kilbride Hill (390m AOD) to the North. The area reaches a topographic height at Cruach nan Capall to the northwest, with an elevation of 611m AOD. The site is incised by numerous burns that generally drain towards the Little Eachaig River via Glen Kin in the north and Holy Loch to the east of the site boundary.

4.2 The proposed development site sits at an elevation of 304-469m AOD between Strone Saul and Elligan and is c.2.1km in length north to south along the hill peak. There is commercial forestry surrounding the site, which is most notable on the

eastern border. The area is located within the steep ridges and mountains Landscape Character Type (LCT), and the Bute and South Cowal Local Landscape Area ('LLA') is located to the west of the Site, 1.9 km from the nearest turbine. There are no landscape, ecological, geological, or archaeological designations within the Site boundary. However, within 10 km of the Site, the following designations are present:

- Loch Lomond and the Trossachs National Park ('LLTNP') is located 1.8 km to the north;
- Loch Eck Wood Site of Special Scientific Interest ('SSSI') (5.4 km to the north), Shielhill Glen SSSI (8.9 km south-east) and North End of Bute SSSI (9.8 km south-west);
- Holy Loch Nature Conservation Site ('LNCS') 1.3 km north-east;
- Six Scheduled Monuments ('SM') within 5 km of the Site – Dunloskin Wood, Platforms and Charcoal Production Area SM (0.1 km to the east), Ardnadam Settlement, Chapel and Enclosure SM (0.4 km to the east), Adam's Cave, Chambered Cairn, Ardnadam SM (0.8 km to the northeast), Ardhalow Battery and Defences SM (2.3 km to the southeast), Kilmun Collegiate Church, Tower and Burial Ground SM (2.6 km northwest), and Dunoon Castle SM (2.7 km to the southeast);
- A further 16 Sms are located within 10km of the Site; and
- Fifteen Category A-Listed Buildings are located within 10 km of the Site. Forty-nine Category B Listed Buildings and fifty-one Category C Listed Buildings are also located within 5 km of the Site.

- 4.3 The Carbon and Peatland Map 2016 illustrates the area as being underlain with Class 1 and 2 Peat, with the majority of the Site situated within an area of Class 2 Peat, with an area of Class 1 Peat within the northern part of the site. The applicant notes its intention to avoid areas of Class 1 Peat and notes that restoration is planned for other areas of the site. Additionally, the Spout Burn intersects the central site area, flowing in a northwestern direction to meet Glenkin Burn.
- 4.4 The proposed access track is located within privately owned areas of commercial forestry comprised largely of commercial conifers with small areas of mixed broadleaves and open ground. There are two separate landowners. Landowner 1 owns four commercial woodland properties; Ardnadam, Dalinlongart, Dunloskin and Glenkin which make up the Sandbank Long Term Forest Plan (LTFP). Landowner 2 owns the Auchamore Forest.
- 4.5 Five new watercourse crossings will be required and seven existing watercourse crossings may need to be upgraded as a result of the proposal. Approximately 10.2 km of on-site access tracks would be required to provide access to the wind turbines, substation, and construction compound. Where possible, the location of the access tracks follows existing forestry tracks. A total of approximately 6.4 km of new track would be created and approximately 3.8 km of existing track would be upgraded.
- 4.6 A total of 32.94 ha of forestry will require to be felled to enable the construction and operation of the Proposed Development. Permanent felling of 3.85 ha is required with a further 21.68 ha proposed for to be felled to restore peatland. The applicant is

proposing to restock approximately 13.57 ha of appropriate compensatory planting and is seeking locations both within and outwith the Site.

- 4.7 Turbine components will be transported to the site from King George V Docks on the River Clyde via the M8 and M898 to cross the Erskine Bridge where the abnormal load will join the A82 westward to Tarbert. Loads will then join the A83 using a new bypass at Tarbert before joining the A815 to head south towards Dunoon. Loads will turn right onto the B836 and proceed westbound. After approximately 2 km, loads will turn into a new site access junction. Here the route mainly follows an existing forestry track into the Site.
- 4.8 There are 3 properties within the proposed site area: Glenkin Cottage, Stronsaul Cottages and Auchenblae.
- 4.9 The proposed development would consist of:
- seven variable pitch (three bladed) wind turbines, five each with a maximum blade tip height of up to 200 m and two up to 180 m;
 - three of the turbines (T1, T3 and T7) would be fitted with visible aviation warning lights;
 - turbine foundations (up to 25 m diameter) and a crane hardstanding area and a temporary blade laydown area, tower and nacelle storage (approximately 4,313m²) at each wind turbine;
 - BESS with a rated power of approximately 23 MW and energy storage capacity of 53 MWh;
 - up to 6.4 km of new on-site access track with a typical running width of 5 m (wider on bends) and 3.8 km of upgraded existing access track (widened from 2.5 m to minimum 5 m & wider on bends) and associated drainage, three turning heads and nine passing places;
 - underground cabling and electrical infrastructure along access tracks to connect the turbine locations, and the on-site electrical substation;
 - one on-site substation compound (40 m x 25 m) which would accommodate a control building for the Scottish and Southern Energy Networks (SSEN) substation and the wind farm substation;
 - one temporary secondary construction compound (50 m x 100 m);
 - one main construction compound for the Applicant (50 m x 100 m);
 - clearance of 32.94 ha of on-site forest with 21.68 ha to be fell for peatland restoration and restocking of approximately 13.57 ha
- 4.10 The BESS would consist of twelve battery containers of steel construction, similar in appearance to shipping containers measuring approximately 9.3 m (l) x 1.7 m (w) x 2.6 m (h). The compound would include a water storage tank, welfare and storage buildings, with the MV switchgear housed in the control room building.
- 4.11 The Proposed Development would be connected to the electricity network via an on-site substation control building located within the substation compound (approximately 50 m x 100 m). The compound would include an area for car parking and High Voltage (HV) equipment, such as transformers and circuit breakers. The main control building would be single storey and would measure approximately 6 m x

26 m with a pitched roof which would be 5.9 m high at its tallest point. It is proposed that the buildings would have a cement render with wet dash finish and the final external finishes would be agreed with Argyll and Bute Council. Underground power cables would run along the side of the access tracks in trenches from each of the turbines to the substation.

- 4.12 To support the application a Biodiversity Enhancement Strategy (BES) is proposed to complement the existing Sandbank Long-Term Forest Plan (LTFP). This will include peat resource and restoration and enhancement, tree planting (including riparian planting), blanket bog targeted management, grazing management, installation of nesting boxes for protected species, mosaic habitat enhancements for black grouse and raptors, monitoring programmes to allow for adjustments to habitat enhancement measures.

Planning history of the site and surrounding area

- 4.13 The closest operational wind farms to the Site are Cruach Mhor, Inverclyde, and High Mathernock & Priestside, all are located between 10 and 20 km from the Site. Additionally, a wind farm known as Inverchaolain is proposed adjacent to the Site which is at the EIA Scoping stage. It is noted that previous applications for proposed wind farms both on this site and the immediate surrounding areas have been consistently refused by the Local Planning Authority and unsuccessful at appeal as follows:

- The previous proposal on this site - the Strone Saul Hill Wind Farm for eight 100m turbines (Local Authority planning reference: 09/00569/DET) - was refused in 2010 on the grounds of significant adverse landscape and visual impacts and insufficient assessment regarding potential impact on golden eagle and black grouse populations.
- Corlarach Hill Wind Farm approx. 3.4km to the south of the proposal site for 14 x 125m turbines (Local Authority planning reference: 07/00851/DET) was refused in 2007 due to the potential significant adverse impacts on nationally important landscapes and dismissed at appeal.
- Black Craig wind farm (16 x100m turbines) (Local Authority planning reference: 07/00851/DET) southwest of the site was dismissed at Planning Appeal as being inappropriate for the location and damaging to visual amenity and the local economy.
- Proposals for Bachan Burn wind farm (2013), approximately 1.6 km to the southeast of the current proposal, were withdrawn.

- 4.14 Given the extensive planning history of the site, it is considered by the Local Planning Authority and statutory consultees such as NatureScot and Loch Lomond Trossachs National Park that this site has been proven to be an unsuitable site for large scale wind farm development.

5. NET ECONOMIC IMPACT, INCLUDING LOCAL AND COMMUNITY SOCIO-ECONOMIC BENEFITS

- 5.1 Policy 11 – Energy of NPF4 states that proposals will only be supported where they maximise net economic impact, including local and community socio-economic

benefits such as employment, associated business, and supply chain opportunities. Policy 30 – the Sustainable Growth of Renewables of LDP 2 requires all applications for wind turbine developments to be assessed in terms of net economic impact, including local and community socio-economic benefits such as employment, associated business, and supply chain opportunities.

- 5.2 Socio-Economic Impact - The expected socio-economic benefits are set out in the submitted Socio-Economic Benefits Report which advises that during the construction phase, it is estimated the proposal will generate 482 direct and indirect job years across Scotland including 58 direct and indirect job years in Argyll and Bute. During the operational phase it is estimated the proposal will generate 14 direct full time equivalent (FTE) and 13 indirect FTE jobs across Scotland, including 10 direct FTE jobs and 6 indirect FTE jobs in Argyll & Bute, per year.
- 5.3 The applicant estimates that during the development and construction phase the proposed development will contribute £39million in direct Gross Value Added (GVA) through its construction. The application proposes that the development will be able to support the development of both skills and businesses in the renewable energy business industry. In line with Scottish government guidelines of £5,000 per MW of installed electricity generating capacity it is estimated that the proposed development could generate up to a total community benefit fund of £12.5million over the 50 years operational life.
- 5.4 In line with Scottish Government best practice principles shared ownership in the development is offered to local community interest groups. Benmore and Kilmun Community Development Trust, Sandbank Community Development Trust and Cowal Community Energy (CCE) have provided neutral representations to the ECU, noting that there are potential financial benefits to the local community from this development as the developer is amenable to agreeing shared ownership and profit sharing with CCE (which has 8 local Community Development Trusts as signed up members).
- 5.5 The developer also proposes £10,000 per annum to provide a Science, Technology, Engineering and Mathematics (STEM) fund for the local community during the operational period of the proposed development and notes it has forged ties with local education centres such as Dunoon Grammar School and the University of the Highlands and Islands.
- 5.6 The economic benefits associated with this proposal during construction and the operational phases relating to job creation and benefits to the local economy are a relevant consideration, which has been considered. Community Benefit is not however, a 'material planning consideration' in the determination of planning applications, as there is no planning mechanism available to secure it. If consent were to be granted, the negotiation of any community benefit either directly with the local community or under the auspices of the Council, would take place outside the application process.
- 5.7 Having due regard to the above it is considered a degree of net economic impact including local and community socio-economic benefits typical of such developments will be provided. It is therefore concluded that the proposal is consistent with the

provisions of Policy 11 – Energy of NPF4, NPF4 Policy 25 – Community Wealth Building and Policy 30 – The Sustainable Growth of Renewables of LDP2 in this regard.

6. IMPACTS ON COMMUNITIES AND INDIVIDUAL DWELLINGS, INCLUDING RESIDENTIAL AMENITY, VISUAL IMPACT, NOISE AND SHADOW FLICKER

- 6.1 Policy 11 – Energy of NPF4 requires that project design and mitigation will demonstrate how impacts on communities and individual dwellings, including residential amenity, visual impact, noise, and shadow flicker have been addressed. Policy 30 – the Sustainable Growth of Renewables of LDP2 requires all applications for renewable developments to be assessed in terms of impacts on communities and individual dwellings, including visual impact, residential amenity, noise, and shadow flicker (including cumulative).

Residential amenity impacts

- 6.2 The submitted Residential Visual Amenity Assessment (RVAA) (Technical Appendix 5.4 of the EIA) of properties within 2km of the proposed turbines states that 118 homes in the study area would have ‘more open’ visibility of the turbines from windows and/or garden, with 55 having open views from their garden and main living area windows and requiring detailed assessment. Figure 5.4.1 in Annex B of the Appendix indicates three individual properties (R1 - Glenkin Cottage, R2 - Stronsaul Cottages and R3 - Auchenblae) and two groups of properties (G4 - Shore Road and G5 - High Road, Massan View, Lorimer Terrace and Allan Terrace) taken forward to detailed assessment.
- 6.3 In this assessment, the RVAA concludes that residents at Glenkin Cottage to the north-west of the Site, at Auchenblae and at the homes with open views on High Road, Lorimer Terrace and Massan View would experience **Large magnitude effects** (illustrative view D from High Road in Appendix 5.3 Illustrative Views), but that the most visible turbines would be set back beyond the skyline and a combination of distance and this partial screening would be sufficient that they would not be experienced as overwhelming or overbearing and the report concludes that the RVA threshold would therefore not be exceeded.
- 6.4 The Council’s Landscape Consultant comments that is notable that residents of numerous properties in Dunoon and Sandbank close to the proposal but outside the 2km RVAA study area would also experience **significant visual effects** as can be seen in the illustrative views in Technical Appendix 5.3 and VP01, VP02 and VP03.
- 6.5 Officer opinion – the proposal would result in widespread, significant impacts on residential amenity both within and outside the RVAA 2km study area. These are considered to result in a significant visual impact on local communities which are not able to be effectively addressed through redesign, due to the prominence, height and location of the proposed development which would appear overbearing from many of the identified viewpoints and illustrative views around Dunoon, Sandbank, Kilmun and Strone.

Noise impacts

- 6.6 ABC Noise Consultant – initially concluded that, in general, good practice has been adopted by the Applicant, with clarifications and confirmations required in relation to: the number of derelict residential properties within the study area; turbine blades will

be fitted with serrated trailing edges (which has an acoustic benefit); strong influence of noise from watercourses on the results over a wide range of wind speeds and queries over the fixed levels of background sound level; inconsistency in the filtering of measured noise levels at higher wind speeds during the daytime at Stronesaul Cottages and Glenkin Cottage; hub height(s) of the turbines; location of the installed rain gauge; and resolution of the graphs showing the prevailing background noise and scatter plot makes it difficult to tell which data was excluded or retained.

- 6.7 The applicant has also applied a lower fixed limit (non-financially involved) of 43 dB LA90 for the night-time period and 35 dB LA90 for the daytime. Given the noted limitations of the measured background sound levels, the application in the derivation of noise limits is not considered robust. Therefore, two options are proposed to the applicant:
- Repeat the survey of background sound levels in a suitably representative location to minimise watercourse noise and redefine the background +5dB limits. Or,
 - Justify a case to adopt a fixed lower limit of 37.5 dB LA90 at all wind speeds for the day and night-time periods.

Suggested proposed conditions are also suggested to limit the noise levels, tonality and amplitude modulation being applied to control noise levels from the proposal.

- 6.8 Following further clarifications from the applicant, the Council's Noise Consultant considers that there are no reasons to refuse the application on noise grounds, subject to the imposition of noise conditions as set out in Appendix A of their advice.

Shadow flicker

- 6.9 Chapter 14 of the submitted EIAR considers the potential for significant shadow flicker effects as a result of the proposal. No properties are predicted to surpass the threshold of 30 hours per year or 30 minutes per day. No significant effects are predicted, and mitigation is not required.
- 6.10 Private Water supplies (PWS) – The EIAR considers the impact on PWS. No PWS sources are hydrologically connected to the footprint of the infrastructure and therefore no significant effects are predicted.

Having due regard to the above, it is considered that while the proposal is likely to be consistent with some of the provisions of NPF4 Policy 11- Energy, there are concerns that the proposal does not comply with all provisions of LDP2 Policy 30 – The Sustainable Growth of Renewables due to the extensive significant visual effects on residential amenity which would impact on communities and individual dwellings. Should planning consent be granted by Scottish Ministers, the conditions recommended by the Council's Noise Consultant and shadow flicker should be attached to mitigate any operational effects.

7. SIGNIFICANT LANDSCAPE AND VISUAL IMPACTS

- 7.1 Policy 11 – Energy of NPF4 requires that project design and mitigation demonstrate how significant landscape and visual impacts have been addressed, recognising that

such impacts are to be expected for some forms of renewable energy. Where impacts are localised and/or appropriate design mitigation has been applied, they will generally be considered acceptable. Policy 4 a) - Natural Places of NPF4 states that proposals which by virtue of type, location or scale will have an unacceptable impact on the natural environment will not be supported. NPF4 Policy 4 c) – Natural Places states that Development proposals that will affect a National Park, National Scenic Area, Site of Special Scientific Interest or a National Nature Reserve will only be supported where:

i. The objectives of designation and the overall integrity of the areas will not be compromised; or

ii. Any significant adverse effects on the qualities for which the area has been designated are clearly outweighed by social, environmental or economic benefits of national importance.

Policy 30 – The Sustainable Growth of Renewables of LDP2 requires all applications for wind turbine developments to be assessed against landscape and visual impacts.

7.2 The Council's Consultant Landscape Architect has undertaken a review of the landscape and visual effects of the proposal, which is based on examination of the EIAR and visits to the area surrounding the site. The Landscape and Visual Impact Assessment (LVIA) within the Environmental Impact Assessment Report (EIAR) accompanying the Section 36 application ECU00005007 (submitted 15 July 2025) appears to accord with the Guidelines for Landscape and Visual Impact Assessment Third Edition and other best practice guidance for wind farm assessment. The Landscape Consultant agrees with most of the findings on the significance of landscape and visual effects, although notes that the significance of effects on views from across the Firth of Clyde are understated.

7.3 While the visualisations in the LVIA generally appear to accord with best practice guidance and present an accurate representation of the proposed development Council's Consultant Landscape Architect raised a number of matters with the proposed methodology. The Applicant has provided clarification on the Council's Landscape consultant advice (29.1.2026) and the Council's Landscape consultant has responded to this (9.2.2026). Please see section C of the Report of Handling for further details. It is not considered that these responses change the overall assessment of the proposal on landscape and visual impact grounds or the recommendation. The following matters of difference remain between the Council's Landscape consultant and the Applicant's Landscape Consultant:

- The inclusion of forest within the ZTV modelling is not considered to comply with best practice for wind farm assessments. It's the first time I have come across its inclusion for a windfarm project. Bare ground ZTVs are the norm representing a precautionary approach to illustrate the 'worse-case'.
- The removal of diseased larch emphasises the unreliability of ZTVs including forest cover. Large-scale felling coups have long-term impacts. Forestry practice allows for 2 years to elapse between felling and restocking and it takes time for replanting to reach 15m height. I would maintain that it is overly optimistic to include all existing forestry in the ZTV. Especially since it would appear that some forestry may already have been felled.
- Some sections of the LVIA lack clarity, for example the Significant effect at VP 23: Strone Hill is not reported in the main LVIA.

- The reason views from Dunoon and Hunter's Quay are referenced in our report is that they are on the approach to the LLTNP and are relevant to those travelling from across the Firth of Clyde to the Park. I don't agree that the visual effects are not 'considerable'. The visual effects experienced at Strone and Kilmun alone would be considerable.
- The LVIA uses the ABLWECS landscape Character Types as a basis for their assessment, so presumably the Applicant has some confidence in it. I would acknowledge that it should be treated with caution given its age and the growth in turbine size since its publication. However, it still provides the best available detailed landscape baseline information and guidance on sensitivities for the region, and is referenced in the LPD2 policy. In the case of Giant's Burn I would argue that significant effects would be more than localised, accepting of course that there is no definition of 'localised' in NPF4. Also it is hard to see how sufficient design mitigation has been applied, given the significance of the residual effects.
- I would not expect cumulative effects with Inverchaolain to carry weight in the decision making process for Giant's Burn, however, I think it important to highlight the potential for significant cumulative effects. If this proposal is consented, it would introduce wind farm development to the Cowal and could make it difficult to refuse further wind farm development on the Cowal.
- The information provided in the EIAR is not enough to fully convince me of no significant effects on the LLA. That is not to say that I believe that the effects would necessarily be significant.

7.4 Landscape Impact - Direct landscape effects would include the removal of small areas of forestry around the locations of turbines T1 and T2; the construction and presence of the wind turbines, tracks and other infrastructure within the open moorland of the site; and the planting and growth of areas of new deciduous shrubs and trees along the forest margin. These changes are not predicted to be significant. **Significant effects on the character of landscapes and seascape** are however, predicted in the EIAR for:

- the host Argyll and Bute Landscape Wind Energy Capacity Study (ABLWECS) Landscape Character Type (LCT) *Steep Ridgeland and Mountains* (LCT1);
- the adjacent LCT4 *Mountain Glens* around Holy Loch, 1.4 km north-east of the turbines (Figure 5.1 indicates theoretical visibility of 5-7 turbines from the majority of this LCT, but on Figure 5.5 this is reduced by forest cover); and
- the adjacent Seascape Character Area 3 *Inner Firth of Clyde*, which extends east along the Clyde from Holy Loch and Dunoon (Figures 5.1 and 5.2 indicate widespread visibility of 5-7 turbines).

7.5 The submitted EIAR states that these would result from the presence of the turbines and close views of the turbines such that they are a key feature of the landscape within the upland area south of Glen Lean, up to 5 km from the turbines, within Dunoon and Sandbank and areas up to 4 km from the turbines across Holy Loch to the north-east, and within the Firth of Clyde up to 6-7 km from the turbines.

7.6 The *Steep Ridgeland and Mountains* LCT described in the Argyll and Bute Landscape Wind Energy Capacity Study (ABLWECS) as '*steep-sided, craggy-topped mountains and sharp ridges, deeply cut by the long, narrow sea lochs of Cowal*' is

illustrated in the visualisation for viewpoints (VP) 03 (Dunoon Castle) and VP07 (Glen Lean) located within it and from VP04 (Strone Pier) within the neighbouring *Mountain Glens* LCT. The *Mountain Glens* LCT is illustrated in the visualisations for VP01 (Lazaretto Point Ardnaman), VP05 (A815 Orchard) and VP06 (Benmore Gardens).

- 7.7 It is noted that the ABLWECS does not advise any further development of commercial scale wind farms (beyond the operational Cruach Mhor and Clachan Flats wind farms) in the Steep Ridgeland and Mountains, stating that landscape and visual sensitivity for turbines > 50m is high and there is no scope to additional new development of this scale in this landscape without significant effects occurring. Of particular significance in relation to the proposal location the ABLWECS states:

‘Strategically, the steep and rugged mountainous terrain of Cowal and its intricate pattern of deep sea lochs strongly contrast with the simpler, lower plateau-like uplands of Clyde Muirshiel and with the more developed character of the coastal edge on Inverclyde and North Ayrshire. The introduction of wind farms and larger turbines seen on the skyline of the Steep Ridgeland and Mountains or against the most prominent coastal edge and promontories of this character type form the wider Firth of Clyde basin would adversely affect the strong sense of Cowal forming the threshold to the ‘Highlands’ and the point where the Glasgow conurbation is left (this perception heightened by the ferry crossing to Dunoon). The present contrast of the landscapes of the Cowal with the more developed Inverclyde and North Ayrshire coast would be diminished.’

- 7.8 The Council’s Landscape Consultant notes that is evident in several of the photomontage views (e.g. VP04, VP05, VP14, VP09) that the very large scale of the turbines would diminish the apparent scale and distance of the hills of the Steep Ridgeland and Mountains of the Cowal Peninsula and introduce turbines to an area of the view where none are currently visible. Although covered to some extent in the visual assessment, despite including a heading ‘Effects on Landscape/ Townscape Character’ and widespread visibility of turbines from Dunoon, Sandbank, Kilmun and Strone, the LVIA does not specifically address the (albeit indirect) effects on the townscape which would result from views of turbines. These views would be extensive throughout these townscape areas as demonstrated in Technical Appendix 5.3 – Illustrative views. Please see paragraphs 6.2 to 6.5 for assessment of residential amenity impacts which are assessed by officers to be unacceptable.

- 7.9 Visual Effects - Figure 5.1 indicates that the higher ground to the west and north would restrict visibility in those directions to areas close to the site and some hill summits, including within LLTNP and channelled views along Glen Lean and Loch Eck. To the east and south, visibility would be more widespread across much of Dunoon and Sandbank, across Holy Loch, along the Firth of Clyde to slopes and hill tops around the coastline, the islands of Bute and Great Cumbrae and around Glasgow.

- 7.10 The proposal would introduce large turbines to an area of the skyline where no other turbines are visible and would fundamentally alter the nature of views towards the Cowal Peninsula experienced by large numbers of people living in and visiting the area. The LVIA predicts **significant visual effects** would arise at the following locations:

- **Sandbank** (VP01 and Illustrative Views A-E in Appendix 5.3): The bareground ZTV indicates widespread theoretical visibility of all seven turbines from Sandbank. Although buildings and woodland would provide some screening, there would be views of the turbines prominent on the skyline from much of the settlement including the coast. Whilst the focus of views from houses along the coastal fringe tends to be seaward, the turbines would appear high above the forested hills that form the backdrop to the settlement.
- **Dunoon** (VP02 and VP03 and Illustrative Views F-I in Appendix 5.3): The bareground ZTV indicates widespread theoretical visibility of all seven turbines from Dunoon. Although buildings and woodland would provide some screening, the turbines would be prominent on the skyline in views from much of the settlement including open spaces and the esplanade. Whilst the focus of views from houses along the coastal fringe tends to be seaward, the turbines would appear high above the forested hills that form the backdrop to the settlement. The large scale of the turbines would diminish the apparent scale and distance of the hills.
- **Kilmun and Strone** (Illustrative Views J-K in Appendix 5.3, VP04): Kilmun and Strone within the LLTNP lie along the A815 coast road overlooking Holy Loch towards the wind farm site. There would be open, close views of all seven turbines prominent on the skyline across the water. The large scale of the turbines would diminish the apparent scale and distance of the hills.
- **Ferry routes between Gourock and Dunoon/Hunter's Quay** (VP03, VP14 and View L in Appendix 5.3): Ferry travellers on both routes would see close views of the turbines on the skyline above Dunoon and Sandbank throughout their journey.
- **Recreational water users between Gourock, Kilcreggan and Dunoon and within Holy Loch** (VP03, VP09, VP14, VP15, VP16 and Views J-L in Appendix 5.3): The Firth of Clyde is a popular recreational boating area with various marinas and sailing clubs along its coastline. Figures 5.2 and 5.3 show the widespread visibility of 5-7 turbines across a large area of the Firth of Clyde extending south beyond Cumbrae and east up the Clyde estuary beyond Helensburgh and Greenock.
- **Local roads and Core Paths between Sandbank and Loch Eck** (VP06): There would be some open views of the turbines from closer routes including the B836, with visibility decreasing further north due to tree cover. VP06 within Benmore GDL within the LLTNP indicates partial visibility with some screening provided by trees.
- **Users of Core Paths within 2 km** (Illustrative View D along High Road in Appendix 5.3): The core paths (indicated on EIA Figure 5.6 Visual Receptors) which run through the forested slopes between the proposal and the edge of Sandbank and from where there would be views of the turbines from felled areas.

Other effects assessed in the EIA as not significant or not assessed

- 7.11 The Council's Landscape Consultant notes that in addition to the significant effects identified above, there would also be widespread impacts on the views across the

Firth of Clyde experienced from along the settled coasts of Inverclyde and North Ayrshire (VP13, VP14, VP15, VP16, VP17), with the introduction of wind turbines above the Cowal Peninsula in an area where there is no existing wind farm development. The effect on users of the A815 is predicted to be not significant, despite the close range views experienced by travellers (VP01, VP03, VP05), albeit intermittently.

- 7.12 The effect at Strone Hill (VP23) within LLTNP is predicted to be not significant, despite the turbine occupying an area of the available panoramic view which is currently free from wind farms, and the other turbines visible being distant and appearing relatively much smaller in scale. All seven turbines proposal would be fully visible and prominent in the view southwest across the Cowal Peninsula which takes in the distant hills of the Isle of Arran, with 'stacking' of two pairs of turbines.
- 7.13 No separate visual assessment appears to have been undertaken for the A880 which runs through Kilmun and Strone within LLTNP, despite the open close-range views across Holy Loch to all seven turbines on the Cowal Peninsula skyline. Several of Scotland's Great Trails covered by the bareground ZTV in Figure 5.1 (e.g. West Island Way, Ayrshire Coastal Path) have not been shown on Figure 5.6 while the LVIA provides limited justification for the effects identified along those routes and no sequential assessment.
- 7.14 Night-time effects - Figure 5.8 includes theoretical visibility of aircraft lighting. The coastal settlements around the Firth of Clyde are well lit and there are bright lights at the various port facilities. The area to the west of the site is more rural and typically dark at night. In the LVIA no significant visual effects are predicted to result from the three proposed red aviation lights. Both LLTPA and NatureScot disagree with this assessment and consider the introduction of aircraft lighting to result in significant effects for example, *"underlying landscape and seascape characteristics including the ridge (largely between Bishops Seat, Big Knap and Strone Saul) that forms part of the site and the wider skyline of the Cowal Hills, the coastal edge and Firth of Clyde remain evident in Viewpoint 9: Kilcreggan, as does the ridge and coastal plain in Viewpoint 5: A815, Orchard within the LLTNP."*

Landscape designations

- 7.15 Landscape designations are shown along with ZTV mapping on Figure 5.2. Loch Lomond and the Trossachs National Park (LLTNP) is located approximately 2.7 km to the north-east of the proposal site on the north-east shore of Holy Loch and continuing to the north and north-east. The Bute and South Cowal Local Landscape Area (LLA) is located 1.7 km to the west of the proposed turbines with the western edge of the proposal site located just within the LLA. The West Renfrewshire LLA lies 10km to the southeast of the proposal.

Bute and South Cowal Local Landscape Area (LLA)

- 7.16 The eastern boundary of this LLA lies less than 2km to the west of the proposed turbines, with the LLA itself extending across the western half of the Cowal Peninsula and around Loch Striven, continuing south to take in much of the Isle of Bute. In the LVIA in the absence of a formal citation the impact of the proposal is considered

against the 'scenic value' of the LLA; the 'quality which derives from the visual composition of the landscape' and is judged to be of high susceptibility and high/medium sensitivity. No attempt has been made to identify individual 'special landscape qualities' against which to assess impacts.

- 7.17 The LVIA predicts that the effect on the LLA would be not significant, noting that theoretical visibility of turbines shown within the LLA, as shown in Figure 5.2 (i.e. theoretical visibility, which assumes screening to be provided by forestry, rather than bare ground worst-case scenario) would principally arise from 'hill summits and facing slopes within 5-7km to the west and north-west of the proposed turbines'; from the western end of Glen Lean as illustrated by VP07, and from Beinn Bhreac around 7-8km to the southwest. Visibility of 3-5 turbines would also arise from areas on the Isle of Bute, but as illustrated by VP20 Rothesay, the turbines would be distant and mostly screened by hills. Notably from this location the proposed Inverchaolain turbines (scoping stage) would be much more prominent and likely to result in significant effects.
- 7.18 Permanent, changes to views are predicted to arise over the upland areas within 5km of the turbines, decreasing up to 9km. The area affected by such changes to views would be divided by areas of no visibility due to terrain and forestry and would comprise a limited extent of this LLA, focussed around the northwest boundary. The effects are predicted to be not significant in the LVIA.

West Renfrewshire Hills LLA

- 7.19 The LLA lies outside the Argyll and Bute administrative area, across the Firth of Clyde approximately 10km to the southeast of the proposal. One quality of the LLA identified as having the potential to be affected by the proposal is: *"a panoramic view stretching to the south-west over the Isle of Bute across the length of the Cowal Peninsula northwards to the Holy Loch and the Rosneath Peninsula. The Renfrew Heights and plateau moorlands separating the Clyde and the Ayrshire basin to the south create strong and containing skylines"*. VP18 (Kelly Cut) shows the turbines seen on the skyline of the Cowal Peninsula. Given the westward orientation of the slopes within the LLA, this would affect most of the designated area as illustrated by Figure 5.2 (note the bare ground ZTV in Figure 5.1 extends further, covering an area under forestry, some of which appears to have been felled recently). The turbines would occupy a relatively narrow arc of the available view. Effects are predicted in the EIAR to be not significant, but the turbines would be visible on the skyline of the Cowal peninsula close to the complex rugged terrain to the north, their large size diminishing the apparent scale of the landform and distance
- 7.20 There are no other wind turbines visible to the west from VP18, although Inverchaolain (at scoping) turbines would also be visible on the skyline, considerably widening the arc over which turbines would be seen and likely resulting in significant cumulative effects. Further assessment of LLAs is found at paragraphs 7.43 and 7.47 below.

Special Landscape Qualities of Loch Lomond and the Trossachs National Park (LLTNP)

- 7.21 An assessment of effects on the Special Landscape Qualities of Loch Lomond and the Trossachs National Park (LLTNP) is included in the LVIA and concludes that a number of relatively minor and localised effects would arise along the south-west boundary of the LLTNP from Strone (refer to VP04 Strone Pier) to Kilmun and the accessible hillsides above these villages (e.g. VP23 Strone Hill), and extend through the glen at the southern boundary closest to the proposal site and along Loch Eck as far as Dornoch Point (VP08). VP05 (A815, Orchard), VP06 (Benmore Gardens Entrance) and VP22 (Benmore Gardens Hilltop) illustrate visual effects experienced from Strath Eachaig within the National Park. Considered together, these effects are predicted in the EIAR to be not significant.
- 7.22 Whilst the geographic extent of close range visibility of turbines from within the LLTNP is limited, it is considered that the significance of visual effects is considerable, particularly from the area across Holy Loch including Kilmun and Strone, and the wind farm would have significant effects on views experienced by visitors to the National Park arriving by ferry at Dunoon and Hunter's Quay and travelling north along the A815 coast road. The photomontage for VP24 (Beinn Mhor, the highest peak on the Cowal Peninsula) indicates that all seven turbines would be visible in an area of the view not currently affected by wind farms and at much closer proximity than other visible wind farms, such that it would affect the sense of remoteness and tranquillity experienced. Looking south along Loch Eck (VP08 Dornoch Point) the introduction of turbines to the focal point of the framed view would alter the sense of remoteness and tranquillity currently experienced.

National Park Authority Assessment of effects on SLQs

- 7.23 The Loch Lomond and Trossachs National Park Authority (LLTPA) is a distinct administrative area to Argyll and Bute and is a statutory consultee to the ECU. The LLTPA has undertaken a planning assessment which focuses on the effects of the proposed development on the Special Landscape Qualities which are part of its National Park landscape designation. Special Qualities are defined (NatureScot 2008) 'as the characteristics that, individually or combined, give rise to an area of outstanding scenery'. These are qualities that are perceived and experienced by people affecting the sense of place.
- 7.24 The LLTPA consultation response notes that Paragraph 5.10.58 of the LVIA concludes that there will be no significant adverse effects on the SLQs of the National Park. It states "*Considering the above effects (referencing table 5.6) on the SLQs together, non-negligible effects would arise along the south-west boundary of the [National Park] from Strone to Kilmun and the accessible hillsides above these villages and extend through the glen at the southern boundary closest to the site and along Loch Eck as far as Dornoch Point. Considered together, these would give rise to impacts of small magnitude on qualities between High and High/medium sensitivity and effects would be moderate, adverse and not significant.*"
- 7.25 The National Park disagrees with this conclusion and considers the following SLQs are likely to experience **adverse effects** resulting from the introduction of the proposed development, some **significant and adverse**. The National Park also consider that the submitted LVIA has underplayed the magnitude of effect, and in some instances the susceptibility and sensitivity of the following SLQs:

General Special Landscape Qualities

SLQ 1: "A world-renowned landscape famed for its rural beauty"

SLQ 5: "Settlements nestled within a vast natural backdrop"

SLQ 7: "Tranquillity"

SLQ 8: "The easily accessible landscape splendour"

Sub area of Argyll Forest Special Landscape Qualities

SLQ 9: "A remote area of high hills and deep glens"

SLQ 12: "The variety of glens"

SLQ 13: "The slender jewel of Loch Eck"

SLQ 15: "The seaside architecture of Kilmun and Blairmore"

7.26 The National Park considers that **significant nighttime effects** will also be experienced in the following: SLQ 1, SLQ 5, SLQ 7, SLQ 8, SLQ 9 and SLQ 13.

7.27 The full LLTPA assessment can be viewed on the [ECU website](#). The National Park's Landscape Assessment concludes: "*the nature and scale of the proposed development at this location is such that it cannot be accommodated without **significant adverse landscape and visual effects**. This includes significant adverse day time effects and night-time effects on the Argyll Forest area of the National Park...*

The introduction of turbines of this scale and in this proximity and location to the National Park boundary, would significant and adversely affect the experience, enjoyment and perception of several SLQs. These SLQs are recognised and valued and are integral to defining the National Park character, scenic value and sense of place. This would undermine the integrity of the National Park designation... It would have a significant adverse impact upon the open views and visual amenity for residents, visitors and recreational users of the National Park including the experience of the Upper and Inner Clyde seascape - the marine gateway to the National Park."

7.28 LLTPA concludes that "*Given significant adverse effects on the National Park and its special qualities it is considered that the proposed development does not comply with NPF4 Policy 4 'Natural Places' c) which is clear that development will only be supported where the objectives of the designation and the overall integrity of the National Park will not be compromised. It also does not comply with NPF4 Policy 11 (Energy) e) ii. due to the extensive (more than localised) nature of the effects on the distinctive landscapes and seascapes of the Upper and Inner Clyde area that cannot be mitigated. The significant adverse effects that the proposal will have upon the Special Landscape Qualities for which the National Park has been designated are not outweighed by social, environmental or economic benefits of national importance. The National Park Authority therefore objects to the proposal."*

NatureScot Appraisal and Advice in relation to Landscape and Visual Impacts

7.29 NatureScot leads on the provision of advice concerning the effects of a proposal on the National Park SLQs caused by proposals outside the National Park. The detailed

submission to the ECU sets out the following areas of disagreement with the submitted assessment:

- Landscape and seascape effects: We anticipate that significant adverse seascape effects reported on SCA 3 Inner Firth of Clyde would extend further than the 6 to 7 km reported and that there would be some significant adverse effects on the southern part of SCA 5 Loch Long and the northern part of SAC 7 Upper Firth of Clyde;
- Townscape effects: Consideration of effects within the assessment on the townscape character of the closest settlements Dunoon, Sandbank, Kilmun and Strone appears to be limited;
- Visual effects: Given the high sensitivity of visual receptors, and accounting for the vertical height and horizontal extent of the proposed development, we consider that the scale of visual change would be higher and in turn that significant adverse visual effects would be experienced by the visual receptor groups illustrated by the below viewpoints:
 - Viewpoint 8: Dornoch Point / A815 receptor group;
 - Viewpoint 23: Strone Hill; and
 - Viewpoint 24: Beinn Mhor Viewpoints and relevant LVIA receptor groups near the Firth of Clyde where applicable;
 - Viewpoint 9: Kilcreggan / Kilcreggan and Kilcreggan-Gourock Ferry elements of this receptor group;
 - Viewpoint 13: Lyle Hill Viewpoint / Visitors to Lyle Hill Viewpoint receptor group;
 - Viewpoint 14: McInroy's Point, Gourock / Gourock receptor group;
 - Viewpoint 15: Lunderston Bay; • Viewpoint 16: Inverkip / Inverkip receptor group;
 - Viewpoint 17: Weymss Bay / Wemyss Bay and Skelmorlie receptor group; and
 - Viewpoint 18: Kelly Cut / Clyde Muirshiel Regional Park receptor group.

7.30 NatureScot consider that other LVIA ZTV Figures including 5.2, 5.5, 5.6 and 5.8 do not represent a worst case scenario as they include screening elements for buildings and forest, which does not represent recent felling within the study area and future ongoing crop rotation. NatureScot consider that the applicant underestimates the geographical extent of potential significant adverse effects particularly on the Upper and Inner Clyde area including associated settled coasts. NatureScot disagrees that there would be no significant adverse effects on the LLTNP.

7.31 NatureScot disagrees that no significant visual effects would be experienced by the LVIA Visitors to the Benmore Botanic Garden receptor group. NatureScot also consider it a notable omission that effects of visible aviation lighting on landscape and seascape character are not considered in the assessment. NatureScot conclude in their advice:

“The site comprises part of a wider area of upland summits and plateaux close to the coastal edge of the Firth of Clyde which plays an important role forming in part

skylines experienced from within the Argyll Forest, across much of the Upper and Inner Clyde area.

The location, size and scale of the proposed development represents a step change in prominence and proximity of wind farms to the Argyll Forest area of the LLTNP and the settled Upper and Inner Clyde area. The Proposal would significantly adversely affect six SLQs of the LLTNP and the experience of the Upper and Inner Clyde area.

These impacts would be to a degree that would result in an evident and noticeable material change to the SLQs of the LLTNP such that the objectives of this designation and overall integrity would be compromised. The Argyll Forest is the only area of the LLTNP (or any national park in Scotland) with a marine element, and the Proposal would have a significant adverse effect on that element - notably the recognised marine gateway of the Holy Loch and its associated coasts. We consider that effects on the Upper and Inner Clyde area would be significant adverse and would result in a substantial change to this area.”

7.32 Based on their assessment NatureScot conclude that “Accounting for the anticipated significant adverse effects on the LLTNP, we advise that the proposed development may therefore not meet Policy 4 c) of NPF4 and may not meet NPF4 Policy 11e (ii) due to the extensive nature of the effects on the distinctive landscapes and seascapes of the Upper and Inner Clyde area.”

7.33 Officer opinion – the Council would defer to the views of LLTPA and NatureScot in relation to the impact of the proposed development on the National Park and the distinctive landscapes and seascapes of the Upper and Inner Clyde area.

7.34 Cumulative effects - There are three other operational wind farms in the 30km cumulative assessment study area:

- High Matherstock & Priestside (three turbines approx 19km away)
- Kelburn Estate/ Millour Hill/ Dalry (28 turbines approx 25km way)
- A' Cruach (21 turbines in two groups of 7 and 14, approx 28km away)

The separation/ scale of these proposed wind farms from the site and pattern of existing and consented development is such that the cumulative effects of the proposal in with these wind farms is unlikely to be significant. There are three wind farms at planning application stage within 30km at Vale of Leven (29 km away), Eredine (29 km away) and Crosbie (25 km away). The separation of these proposed wind farms from the site and pattern of existing and consented development is such that the cumulative effects of the proposal in with these wind farms is unlikely to be significant.

7.35 Inverchaolain Wind Farm is at the scoping stage and proposed a short distance to the southeast of the proposal. Although the wirelines in VP01-24 include this wind farm proposal (likely significant) cumulative effects of the proposal with this potential development have not been considered in the assessment. Both NatureScot and LLTPA note that this proposal is likely to have significant cumulative effects on landscape and visual impact, should it proceed to determination.

Review against NPF4 Policy 4 and 11

- 7.36 The NPF4 national spatial strategy acknowledges the need for a rapid transformation across all sectors of our economy and society in order to meet our climate ambitions. At the same time, it stresses the importance of ‘ensuring the right development happens in the right place.’ This proposal is located on the southern edge of a National Park and so NPF Policy 4c applies which states that: *development proposals that will affect a National Park will only be supported where:*
- i. The objectives of designation and the overall integrity of the areas will not be compromised; or*
 - ii. Any significant adverse effects on the qualities for which the area has been designated are clearly outweighed by social, environmental or economic benefits of national importance.*
- 7.37 Both the LLTPA and NatureScot have concluded that the location, size and scale of the proposal would result in significant adverse effects on six of the SLQs of the LLTNP and the experience of the Upper and Inner Clyde area. These impacts are concluded to be to such a degree that they would result in an evident and noticeable material change to the SLQs of the LLTNP such that the objectives of this designation and the overall integrity of the National Park designation would be compromised. **Both statutory consultees object to the proposal on landscape and visual impact grounds and note that the proposal does not meet NPF4 Policy 4c. It is not clearly demonstrated that the significant adverse effects on the qualities for which the area has been designated are outweighed by social, environmental or economic benefits of national importance, given the relatively small contribution of this proposed development of 50mw to national energy generation.**
- 7.38 Policy 11e (ii) requires project design and mitigation to demonstrate how impacts on communities and significant landscape and visual impacts are addressed. In terms of significant landscape and visual impacts, NPF4 Policy 11e (ii) states that “*such impacts are to be expected for some forms of renewable energy and where impacts are localised and/or appropriate design mitigation has been applied, they will generally be considered acceptable.*” However, NPF4 provides no guidance on the definition of what constitutes ‘localised effects’ and it is recognised that the impacts of individual proposals therefore require to be considered on a case by case basis.
- 7.39 Chapter 2 – Site Description and Design Evolution of the submitted EIAR summarises the evolution of the design and mitigation embedded into the design to reduce the landscape and visual effects of this proposal. These include a reduction in the number of turbines from nine to seven, relocations of turbines and of substation and construction compound to reduce impact on landscape and visual receptors, moving turbines away from homes, and reducing tip height of the two turbines closest to Dunoon and Sandbank to mitigate visual effects. Other recorded mitigation measures include seeking to avoid turbine bases being seen in front of the skyline in views from the east (although some turbine bases would remain visible), a reduced aviation lighting scheme to minimise the number of lights and aviation lights to reduce to 200 candela (from 2000 candela) in good visibility.

- 7.40 Although the above design/mitigation measures may be considered appropriate and may have reduced landscape and visual effects to some extent, significant effects remain for large numbers of receptors as detailed in the LVIA. Significant visual impacts of the proposals would be experienced by large numbers of people including visitors to the LLTNP, visitors and residents of Dunoon, Sandbank, Kilmun, Strone, Gourock, Inverkip, Wemyss Bay and recreational users of the Upper and Inner Firth of Clyde area. The extent of these impacts over multiple administrative areas are considered to be more than a 'localised area'. The proposal would introduce visually prominent wind farm development to a widely visible area of the landscape that has none, significantly altering the way the landscape – including designated distinctive landscapes of the Argyll Forest area of the LLTNP and distinctive Upper and Inner Clyde areas landscapes and seascape - would be perceived and enjoyed by residents and visitors alike.
- 7.41 Furthermore both LLTPA and NatureScot advise in their consultation responses that given the proposed siting, scale and type of development, it would not be feasible to overcome the significant adverse effects identified within the site parameters. NatureScot note that: *“While the turbine height and number could be reduced, accounting for the sites’ location within hills behind Dunoon close to the sensitive coast which is intervisible from highly sensitive areas of the LLTNP, and across a widespread extent of the Upper and Inner Clyde area, it is considered unlikely that the significant effects identified could be notably reduced. **We therefore consider that these effects are unlikely to be overcome through re-design or removal of turbines.**”* LLTPA also conclude in their consultation response that: *“given the proposed siting, scale and type of development, it would not be feasible to overcome the significant adverse effects identified within the site parameters. The National Park does not consider that there is any option for mitigation of the development’s impact.”*
- 7.42 It is further noted that the extent of the significant and adverse effects experienced over a wide area which encompasses the National Park, its approach via the Firth of Clyde and the A815, settlements of Dunoon, Sandbank, Strone, Kilmun and wider impacts experienced from the Bute and South Cowal LLA, the West Refrewshire Hills LLA and views from Inverkip, Gourock and Wemyss Bay demonstrate the extensive regional rather than 'localised' impact of this proposal. It is therefore considered that the proposals do not meet the policy provisions of NPF4 4 (c) or 11e (ii).

Review against LDP2 Policy 30 and Policy 71

- 7.43 LDP2 Policy 30 states that The Council will support renewable energy developments where these are consistent with the principles of sustainable development and it can be adequately demonstrated that there would be no unacceptable environmental effects, whether individual or cumulative, on local communities, natural and historic environments, landscape character and visual amenity, and that the proposals would be compatible with adjacent land uses. All applications for wind farms will be assessed against, among other things, impacts on communities and individual dwellings, including visual impact and residential amenity and landscape and visual impact.

- 7.44 The Council's Landscape Consultant advises that they expect landscape and visual considerations to carry considerable weight in the council's overall judgment. Significant visual impacts would be experienced from large numbers of properties in Sandbank, Dunoon, Kilmun and Strone and significant landscape and visual effects would occur over a wide area extending across the Firth of Clyde and beyond the National Park boundary. Although the submitted RVAA does not predict any overwhelming or overbearing effects at residential properties, it is notable that it predicts that 118 homes in the study area would have 'more open' visibility of the turbines from windows and/or garden and that residents of numerous properties in Dunoon and Sandbank outside the 2km RVAA study area would experience significant adverse visual effects. Significant effects are predicted for the Ridgeland and Mountains LCT, the adjacent Mountain Glens around Holy Loch LCT and Seascape Character Area 3 Inner Firth of Clyde, as well as on ferry routes and recreational water users in the Firth of Clyde and local roads and core paths.
- 7.45 LDP2 Policy 71 states that the council will resist development in, or affecting, a Local Landscape Area where its scale, location or design will have a significant adverse impact on the character of the landscape. All development proposals in or affecting a Local Landscape Area must demonstrate that:
- a) Any significant adverse effects on the landscape quality for which the area has been designated are clearly outweighed by social, economic or environmental benefits of community wide importance;*
 - b) The proposal is supported by a landscape and visual impact assessment and has taken account of the content of any relevant Argyll and Bute Landscape Capacity Assessment.*
- 7.46 The Bute and South Cowal LLA lies less than 2km to the west of the proposed turbines, however the LVIA predicts that landscape effects on the LLA would be not significant. Based on the visualisations from Rothesay on Bute (VP20) and Glen Lean (VP07) it seems unlikely that the character of the LLA would be significantly affected. However, without further visualisations from more elevated locations to the west of the proposal and consideration of effects on key landscape qualities it is difficult to assess the significance of the effects on this LLA. It is also notable that the ZTV (Figure 5.2) gives forestry areas an assumed height of 15m, which given that most areas are commercial conifer plantations subject to periodic felling, may lead to under-representation of the visibility of the wind turbines from within the LLA.
- 7.47 The proposal is accompanied by an LVIA which identifies widespread significant effects even with mitigation in place. The LVIA has considered the content of the ABLWECS and argues that the wind farm design 'performs well against three of the four design criteria set out for the host landscape type in the ABLWECS'. However, the ABLWECS does not advise any further development of commercial scale wind in the Steep Ridgeland and Mountains, stating that landscape and visual sensitivity for turbines > 50m is high and there is no scope to additional new development of this scale in this landscape without significant effects occurring. It also states that 'The introduction of wind farms and larger turbines seen on the skyline of the Steep Ridgeland and Mountains or against the most prominent coastal edge and promontories of this character type form the wider Firth of Clyde basin would

adversely affect the strong sense of Cowal forming the threshold to the 'Highlands' and the point where the Glasgow conurbation is left (this perception heightened by the ferry crossing to Dunoon). The present contrast of the landscapes of the Cowal with the more developed Inverclyde and North Ayrshire coast would be diminished.

Officer's Conclusion

7.48 Having reviewed several recent wind energy development decisions, the key NPF4 test in relation to the acceptability of wind farm proposals appears to be 'the right development in the right place'. Based on the planning history of this site, expert advice of the Council's Consultant Landscape Architect, and the consultation responses of NatureScot and LLTPA it is concluded the proposal warrants an objection on landscape and visual grounds. The proposal is anticipated to result in extensive significant adverse effects on both the immediate and neighbouring residential areas, the LLTNP and on the distinctive landscapes and seascapes of the Upper and Inner Clyde which cannot be described as 'localised' due to their extent. Due to the proposed location and scale of the proposal, it is not considered that these significant and adverse effects can be mitigated. It is also not considered that the significant adverse effects on the qualities for which the LLTNP has been designated are outweighed by social, environmental or economic benefits of national importance, given the relatively small contribution of this proposed development of 50mw to national energy generation.

7.49 **Having due regard to the above it is therefore concluded that the proposal does not comply with the provisions of NPF4 Policy 4c) Natural Places and NPF4 Policy 11e (ii) Energy and Policy 30 – The Sustainable Growth of Renewables of LDP2 as the proposed wind farm would result in extensive significant adverse landscape and visual effects.**

Should consent be granted a planning condition should be attached to require an Aircraft Detection Lighting System (ADLS), as an additional mitigation measure in regard to visible aviation lighting. This additional measure is recommended by NatureScot in their response to the ECU.

8. IMPACTS ON TOURISM AND RECREATION

8.1 Policy 11 – Energy of NPF4 does not require impacts on tourism to be considered. Policy 30 – The Sustainable Growth of Renewables of LDP2 requires all applications for wind turbine developments to be assessed against impacts on tourism and recreation.

8.2 Tourism – Policy 11 of NPF4 does not include a requirement for the impact of proposals on tourism to be assessed. However, Policy 30 – The Sustainable Growth of Renewables of the LDP does. In Argyll & Bute the landscape is regarded as being a particularly valued asset both in terms of its intrinsic qualities and in terms of its value to the tourism economy. For all types of development, the maintenance of landscape character is an important facet of decision-making in the countryside in Argyll & Bute, regardless of the scale of development proposed.

8.3 The submitted material highlights that the following groups would be ‘visual receptors’ and impacted by the proposed development:

- Users of Core Paths within 2 km – which run through the forested slopes between the Site and the edge of Sandbank and from where there would be views of the turbines from felled areas (major/moderate and adverse);
- People living in and visiting Sandbank – which lies at the foot of the forested slopes to the east of the Site and would have open views from some streets (major and adverse);
- People living in and visiting Dunoon – which lies at the foot of the forested slopes to the east of the Site and would have open views from some streets and open spaces (major/moderate and Adverse);
- Users of local roads and Core Paths between Sandbank and Loch Eck – from where there would be some open views of the turbines from closer routes including the B836, with visibility decreasing further north due to tree cover (major/moderate and Adverse);
- Ferry passengers on the two routes between Gourock and Dunoon/Sandbank – who would see close views of the turbines on the skyline above Dunoon throughout their journey (major/moderate and adverse);
- People living in and visiting Kilmun – from where there would be open, close views of the turbines across Holy Loch, which is the main outlook from the village (major and adverse);
- People living in and visiting Strone – from where there would be open views of the turbines across Holy Loch, which is the main outlook from the village (major/moderate and adverse); and
- Recreational water users between Gourock, Kilcreggan and Dunoon and within Holy Loch – from where there would be close views of the turbines on the skyline above Dunoon and Sandbank

8.4 The submitted LVIA states that visual effects would be largely localised in spatial extent, with no significant effects beyond a distance of 11/12km. However, the Council’s Landscape Consultant notes that Several of Scotland’s Great Trails covered by the bareground ZTV in Figure 5.1 (e.g. West Island Way, Ayrshire Coastal Path) have not been shown on Figure 5.6 while the LVIA provides limited justification for the effects identified along those routes and no sequential assessment. The applicant has responded to note that most receptors would experience negligible effects as a result of the Proposed Development, and the remainder would not experience significant effects (Dunoon to Portavadie cycle

route, National Cycle Route 75/753 and Ayrshire Coastal Path). For each of these, the visibility of other wind farms from parts of the route is not likely to alter the effects arising from the Proposed Development, given the very limited visibility of operational and consented development indicated for each route by Figure 5.10 which shows cumulative visibility with operational and consented wind farms.

8.5 As Tourism and Landscape & Visual matters are intrinsically linked, and there is little evidence to demonstrate whether wind farms adversely affect tourism, it is considered that such impacts are covered in the landscape and visual impact assessment of the proposal. This proposal has a significant and widespread landscape and visual impact which is likely to result in the deterioration in the enjoyment of the landscape as it is accessed by identified 'visual receptors' including visitors and tourists.

8.6 Having due regard to the above it is not possible to determine whether the proposal is consistent with the provisions of LDP2 Policy 30 – The Sustainable Growth of Renewables - impacts on tourism and recreation, although it is likely that there will be major and adverse impacts on many identified 'visual receptors'.

9. PUBLIC ACCESS

9.1 Policy 11 – Energy of NPF4 requires that project design and mitigation demonstrate how impacts on public access are addressed, including impact on long distance walking, and cycling routes and scenic routes. Policy 30 – the Sustainable Growth of Renewables of LDP2 requires all applications for wind turbine developments to be assessed against impacts on public access, including impact on long distance walking and cycling routes and those scenic routes identified in NPF4. Policy 32 – Active Travel of LDP2 requires active travel and recreation to be integrated in developments from the start of the wider design process and existing active travel networks should be safeguarded and integrated with the development.

9.2 The submitted LVIA that significant visual effects would arise for the following groups of visual receptors:

- Users of Core Paths within 2 km – which run through the forested slopes between the Site and the edge of Sandbank and from where there would be views of the turbines from felled areas (major/moderate and adverse);
- Users of local roads and Core Paths between Sandbank and Loch Eck – from where there would be some open views of the turbines from closer routes including the B836, with visibility decreasing further north due to tree cover (major/moderate and Adverse).

9.3 Access to the site is via the B836 which is also National Cycle Route 75. The Core Path Dunans loop to Inverreck and the Loch Lomond and the Trossachs National Park boundary intersects the development site boundary and part of this core path will be used to access the development. An Access Plan is recommended to secure ongoing accessibility of existing public access routes nearby and within the proposed development site.

9.4 Having due regard to the above subject to the use of a planning condition to access plans in the event that consent is granted, it is considered the proposal is consistent with the provisions of Policy 11- Energy of NPF4, Policy 30 – the Sustainable Growth of Renewables; and Policy 32 - Active Travel of the LDP2.

10. AVIATION AND DEFENCE INTERESTS INCLUDING SEISMOLOGICAL RECORDING

- 10.1 Policy 11 – Energy of NPF4 requires that project design and mitigation demonstrate how impacts on aviation and defence interests including seismological recording have been addressed. Policy 30 – the Sustainable Growth of Renewables of LDP2 requires impacts on aviation and defence interests and seismological recording to be addressed. Policy 43 – Safeguarding of Aerodromes of LDP2 stipulates that development will not be permitted where it would compromise the safe operation of an Aerodrome or Technical Site or constrain their present or future operations.
- 10.2 National Air Traffic Services Safeguarding (NATS) and Glasgow Airport have advised that the proposal conflicts with their safeguarding criteria and have submitted objections. At the time of writing there has been no update from the ECU or the applicant in relation to ongoing discussion to resolve these matters. It is therefore not possible to determine whether these matters have been appropriately addressed in line with the provisions of LDP2 and NPF4 policies.
- 10.3 Should it subsequently be agreed with the ECU that the NATS and Glasgow Airport Safeguarding objections are withdrawn it is anticipated an appropriately worded condition will be imposed which will mitigate the unacceptable impacts on the operation of the primary radar located at Lowther Hill and associated air traffic management operations.
- 10.4 **Having due regard to the above it is not possible to conclude whether the proposal is consistent with the provisions of Policy 11 – Energy of NPF4 and Policies 30 – The Sustainable Growth of Renewables and 43 – Safeguarding of Aerodromes, of the LDP2. Appropriate planning conditions may be required to resolve these issues should Scottish Ministers decide to grant consent.**

11. TELECOMMUNICATIONS AND BROADCASTING INSTALLATIONS

- 11.1 Policy 11 – Energy of NPF4 requires that project design and mitigation demonstrate how impacts on telecommunications and broadcasting installations, have been addressed particularly, ensuring that transmission links are not compromised. Policy 30 – The Sustainable Growth of Renewables of LDP2 requires all applications for wind turbine developments to be assessed against impacts on telecommunications and broadcasting installations, particularly ensuring that transmission links are not compromised.
- 11.2 BT advised the ECU the proposal should not cause interference to BT's current and presently planned radio network. BT require 100m minimum clearance from any structure to the radio link path. Joint Radio Company - advised the ECU the proposal is CLEARED - subject to 50m Micrositing with respect to radio link infrastructure operated by the local energy networks.
- 11.3 **Having due regard to the above subject to the conditions recommended by BT, and the Joint Radio Company it is concluded that the proposal will not have any adverse impacts on telecommunications, broadcasting installations and transmission links (including cumulative impacts) and is consistent with the provisions of Policy 11- Energy of NPF4 and Policy 30 – The Sustainable Growth of Renewables of LDP2 in this respect.**

12. ROAD TRAFFIC AND ADJACENT TRUNK ROADS

- 12.1 Policy 11 – Energy of NPF4 requires that project design and mitigation demonstrate how impacts on road traffic and on adjacent trunk roads have been addressed, including during construction. Policy 30 – the Sustainable Growth of Renewables of LDP2 requires all applications for wind turbine developments to be assessed against impacts on road traffic and impacts on adjacent trunk roads. Policy 35 – Design of New and Existing, Public Roads and Private Access Regimes of LDP2 acceptance of development utilising new and existing public roads, private roads and private access regimes is subject to road safety and street design issues being addressed to the satisfaction of the Roads Authority and the Planning Authority. Policy 38 – Construction Standards for Public Roads requires that accesses which connect to or impact significantly on a Trunk Road require consultation with Transport Scotland.
- 12.2 The Site would be accessed from the B836. Regular construction traffic, inclusive of Heavy Goods Vehicles (HGVs), would use the B836 to deliver the necessary turbine components to the Site. It is assumed that these components will be delivered to King George V Dock, Glasgow, and use the A82 to Tarbet, join the A815 and head southbound toward Dunoon towards Sandbank (north of Dunoon). Loads will then join the B836 and head westbound for approximately 2 km and join the Site access junction. During the construction phase HGV traffic levels are expected to increase more than 90% on sections of the A815, and 70% on the B836. A Construction Traffic Management Plan (CTMP) would be prepared to detail the measures required to manage vehicles travelling to and from the proposed Site. This would be updated through the planning and construction of the Proposed Development. With the implementation of appropriate mitigation, the assessment concludes that residual effects would be minor to negligible and would occur during the construction phase only.
- 12.3 Transport Scotland (TS) have advised the ECU they have no objection subject to conditions being attached to any consent to secure submission and approval of a Construction Traffic Management Plan (CTMP), the route for abnormal loads, abnormal load accommodation measures required, and any necessary additional signing or temporary traffic control measures. In addition to the advisory notes are provided relating to works within the trunk road boundary.
- 12.4 ABC Roads and Infrastructure Services (RIS) – have insufficient detail to make proper evaluation from a roads perspective and as such give general instruction. The Construction Traffic Management Plan (CTMP) is required to evaluate the proposals and address a number of points, including:
- Concerns over the 'straight' section leading on to the exit/B836. We assume the straightening is to allow for abnormal load movement, however for other traffic we have concern over the speed of vehicles/run off onto the B836.
 - The visibility splays provided to west/left of exit to B836 are in excess of the 136m required. Obstacles to visibility, particularly to the west require detail as to how they would be overcome.
 - The junction onto the B836 shows a proposed widening but does not take into account overcoming the dip in gradient to the west nor the telecoms pole that would require relocation.
 - Detail of the road width/passing places on the access road, particularly near entrance e.g. to prevent queuing

- Confirmation of borrow pit use/concrete batching on-site or sourced from off-site
- Location of wheel washing/inspection areas
- Services access locations
- Detail on entrance/exit onto public road – access width, design etc
- Width of access road.

12.5 RIS have no objection subject to conditions to ensure that the matters raised above are addressed in the CTMP. Notice is also requested of proposed routes for abnormal roads and access road entrance to standard required in our Roads Development Technical Guidance including drainage and prevention of water/objects onto the public road.

12.6 Having due regard to the above, subject to the conditions recommended by Transport Scotland and Roads & Infrastructure Services it is considered that the proposal is consistent with the provisions of Policy 11 – Energy of NPF4, Policy 30 – The Sustainable Growth of Renewables, Policy 35 – Design of New and Existing, Public Roads and Private Access Regimes and Policy 38 – Construction Standards for Public Roads in this regard. It is recommended that the conditions required by Area Roads and Amenity Services are attached to any consent granted by the ECU.

13. HISTORIC ENVIRONMENT

13.1 Policy 11 – Energy of NPF4 requires that project design and mitigation demonstrate how impacts on the historic environment have been addressed. Policy 7 – Historic Assets and Places of NPF4 intent is to protect and enhance historic environment assets and places, and to enable positive change as a catalyst for the regeneration of places. Policy 30 – The Sustainable Growth of Renewables of LDP2 requires all applications for wind turbine developments to be assessed against impacts on the historic environment, including scheduled monuments, listed buildings and their settings. Policy 15 – Protection, Conservation and Enhancement of Our Historic Environment, Policy 19 – Scheduled Monuments, Policy 20 – Gardens and Designed Landscapes, and Policy 21 – Sites of Archaeological Importance support the key policies and provide guidance on assessing development proposals against heritage impacts.

13.2 Historic Environment Scotland (HES) – required the submission of additional wireline and photomontage visualisations to be able to fully understand and assess the potential effects on the setting of the following assets:

- Dunoon Castle (Scheduled Monument SM5450)
- Ardnadam, settlement, chapel and enclosure (Scheduled Monument SM3235)
- Adam’s Cave Chambered Cairn (Scheduled Monument SM6552)
- Ardgowan House, Inverkip (Category A Listed Building LB12480)
- Ardgowan (Inventory Garden & Designed Landscape GDL00021).

Further information and visualisations were provided by the applicant which was reviewed by HES as being unlikely to be any significant adverse impacts on the setting of Ardgowan House, Inverkip (Category A Listed Building LB12480), and Ardgowan (Inventory Garden & Designed Landscape GDL00021). In addition, HES stated that although there are likely to be **significant adverse impacts on the setting of Dunoon Castle** (Scheduled Monument SM5450), our own assessment of

these impacts are that these are unlikely to be of the magnitude that we would object. However HES maintain their stated **objection** due to insufficient information available to assess the impact on the following assets:

- Ardnadam, settlement, chapel and enclosure (Scheduled Monument SM3235)
- Adam's Cave Chambered Cairn (Scheduled Monument SM6552)

13.3 LDP2 Policy 30 sets out that applications for all wind turbine developments will be assessed against impacts on the historic environment, including scheduled monuments, listed buildings and their settings. The Planning Authority has concern at the significant impact of the proposal on the integrity of the setting of Dunoon Castle and considers that the proposal would not comply with this element of LDP2 Policy 30 and Policy 19.

13.4 **Having due regard to the above it is not possible to determine whether the proposal is consistent with the provisions of Policy 11 – Energy and Policy 7 – Historic Assets and Places of NPF4, and Policies 30 – The Sustainable Growth of Renewables; 15 – Protection, Conservation and Enhancement of Our Historic Environment; 19 – Scheduled Monuments; 20 – Gardens and Designed Landscapes; and 21 – Sites of Archaeological Importance of the LDP2.**

14. HYDROLOGY, THE WATER ENVIRONMENT AND FLOOD RISK

14.1 Policy 11 – Energy of NPF4 requires that project design and mitigation demonstrate how effects on hydrology, the water environment and flood risk have been addressed. Policy 30 – Supporting the Sustainable Growth of Renewables of LDP2 requires all applications for wind turbine developments to be assessed against impacts arising from effects on hydrology, the water environment and flood risk (including cumulative). Policy 55 - Flooding of LDP2 provides guidance on the type of development that will be permissible within specific flood risk areas. Policy 57 – Risk Appraisals requires flood risk assessments, and drainage impact assessments, to accompany applications where required.

14.2 The Planning Authority's Flood Prevention Officer – has advised they have no objection subject to conditions to ensure that any proposed watercourse crossings are designed to convey the 1 in 200 year plus climate change flood event and that surface water drainage is designed in accordance with CIRIA C753 and ensure that post development surface water runoff does not exceed the pre-development surface water runoff. The surface water drainage should be in operation prior to the start of construction.

14.3 **Having due regard to the above, subject to the conditions recommended by the Flood Prevention Officer it is concluded that the proposal is consistent with the provisions of Policy 11 – Energy of NPF 4, Policy 30 – The Sustainable Growth of Renewables, Policy 55 – Flooding; and Policy 57 Risk Appraisals of LDP2.**

15. BIODIVERSITY

15.1 Policy 11 – Energy of NPF4 requires that project design and mitigation demonstrate how impacts on biodiversity, including birds have been addressed. Policy 1 – Tackling the climate and nature crises of NPF4 requires that when considering all

proposals significant weight will be given to the global climate and nature crises. Policy 3 – Biodiversity of NPF4 requires proposals to protect biodiversity, reverse biodiversity loss, deliver positive effects from development and strengthen nature networks. Policy 5 – Soils of NPF4 supports the generation of energy from renewable sources that optimises the contribution of the area to GHG emissions reduction targets on peatland, carbon-rich soils, and priority peatland. A detailed site-specific assessment will be required for development on peatland which will include the net effects of the development on climate emissions and loss of carbon.

- 15.2 Policy 30 – The Sustainable Growth of Renewables of LDP2 requires all applications for wind turbine developments to be assessed against impacts arising from effects on the natural heritage, including birds and to be assessed against impacts on carbon rich soils, using the carbon calculator (including cumulative). Policy 73 – Development Impact on Habitats, Species and Biodiversity requires proposals to incorporate, safeguard and enhance existing site biodiversity wherever possible.

Priority Peatland Habitat

- 15.3 In relation to impacts on peat, NPF4 Policy 5 – Soils states that ‘Where development on peatland, carbon-rich soils or priority peatland habitat is proposed, a detailed site specific assessment will be required’. In addition, Policies 30 and 79 of LDP2 seek to assess applications against their impacts on carbon rich soils, advising that development that would potentially have a significant adverse effect on peat structure and function will not be supported.
- 15.4 The majority of the site is identified as Class 2 peatland, with an area of Class 1 peat to the north containing proposed turbine (T4) and track infrastructure. As per habitat surveys, the site is characterised by extensive blanket bog (235.81ha), which primarily consists of M19 Calluna– Eriophorum vaginatum mire, significant areas of M17 blanket mire on wetter ground and localised bog pools (M1, M2, M3). Blanket bog communities on this site are primarily associated with deeper peat substrates (1.5m - 9.0m) as confirmed by habitat surveys. Past management has caused erosion and modification, however much of the site retains intact mire communities of high ecological value. The site, including areas of proposed infrastructure, features natural surface patterns, widespread blanket mires, peat-forming species and scrub/trees are largely absent. This indicates that the peatland habitats within the development boundary are of national importance.
- 15.5 The EIA Report states that the Proposal will result in the loss of approximately 14.34ha of priority peatland habitat; 7.41ha direct loss and 6.66ha indirect losses are described in Chapter 6 – Ecology. Losses are primarily described for M19 blanket bog (13.28ha, 8.75%), M17 (0.79ha, 0.94%) and M25 on peat >0.5m (0.27ha, 9.57%). No losses are described for bog pool communities; however, these habitats appear to exist in close proximity to some of the proposed infrastructure and may be at risk of indirect impacts. It is unclear how the 10m dewatering buffer to inform indirect loss has been justified, and whether any other potential indirect impacts such as drainage or sedimentation have been assessed or incorporated into the peat loss and carbon calculations. Furthermore, there are weaknesses noted in survey accuracy, mapping consistency, and application of the mitigation hierarchy. The methodology used to calculate the area of peatland impacted is unclear and there is a concern that excavation estimates are conservative.

- 15.6 NatureScot notes that currently the proposal does not provide sufficient evidence to demonstrate compliance with NPF4 Policies 3 and 5 and sets out in their response a number of measures for further attention relating to management of peatland impacts, avoiding impacts through the mitigation hierarchy and a more robust Biodiversity Enhancement Strategy with offsetting in the order of 1:10 required (as opposed to the 1:5.7 currently proposed).
- 15.7 NatureScot concludes that the magnitude of such impacts to deep peat, with associated carbon losses, in the case that such concerns are not addressed, are at odds with the climate emergency and the intended purpose of the Proposal in contributing to net zero. It must be noted that NPF4 Policy 5c states that developments on carbon-rich soils and priority peatland will only be supported for the generation of energy from renewable sources that optimises the contribution of the area to greenhouse gas emissions reduction targets or restoration of peatland habitats. The proposed Turbines are sited on Class I and Class II peat with T2, T3 and T4 appearing to be sited on areas of **deep peat**. As per NPF4 Policy 5, the mitigation hierarchy should be adhered to, with areas of deep peat avoided in the first instance. Areas of potentially **High Dependent GWDTE** also appear to be impacted on. These areas should be avoided. SEPA have also raised the impact on deep peat as an issue requiring further information – however at the time of writing there has been no response from the applicant on these matters.
- 15.8 Ironside Farrar, Peat Landslide Hazard Risk Assessment (PLHRA), Stage 1 Checking Report advised the ECU that the PLHRA required resubmission to address a number of matters. At time of writing no further response has been received from the applicant. Consequently, it is not possible to reach a conclusion on the acceptability of the proposal in this regard.
- 15.9 As there are unresolved issues in relation to impacts on deep peat, priority peatland habitats and in relation to the contents of the Peat Landslide Hazard Risk Assessment, as set out above, it is recommended that the Council objects to the proposal on the grounds that it is not possible to reach a conclusion on the proposal's acceptability in this regard at this time and the Council should object on these grounds.
- The Local Biodiversity Officer advice
- 15.10 The proposed site is linked hydrologically to Holy Loch LNR / LNCS and may impact upon the qualifying features present, however there is insufficient information to determine how significant this may be. Ancient woodland and native woodland are also present on the site and additional surveys were requested. However the Applicant has responded to note all ancient woodland felling is non-native conifer and therefore a tree survey is not required. The applicant also notes that a 1:10 enhanced compensatory planting proposal has been offered in recognition of the disturbance of AWI soils.
- 15.11 Activity levels recorded as High, Moderate to High and Moderate for several species across the site including **European Protected Species and Protected Species Otter, Badger, Water Vole, Red Squirrel and Pine Martin, invertebrates, amphibians**). The applicant has confirmed that these are to be covered by pre-works surveys and Species Protection Plans should planning consent be granted.
- 15.12 In relation to bats, the Council's Biodiversity Officer and NatureScot have advised the rotation speed should be reduced and monitoring of any fatalities that may occur from collision should be undertaken, as bats are found to forage within the wind

turbine areas. The applicant has responded that *'an intentionally balanced approach to bats was taken resulting in an overall picture of Medium risk to individual bats. The Population Risk Assessment was undertaken for species of high population vulnerability and was concluded to be Low. Pipistrelle bats (86% of the calls) are not of high population vulnerability (excluding Nathusius' pip which comprised only 22 calls, vs 3500 of common and soprano pips combined).'* The applicant refers to guidance which states, "Where there is little scope for avoiding areas of high risk through micro-siting or a reduction in the number of turbines, buffers and/or curtailment mitigation can be put in place". Buffers are already stipulated as a matter of best practice, but the proposed development area is not high risk, therefore the suggestion for additional mitigation that would affect energy generation is not strongly supported by the guidance and therefore there are no plans to curtail the individual turbines. No curtailment is proposed at this site, however post-construction monitoring could be included in the detailed BEP post-consent, to be agreed prior to construction in order to improve understanding of bat activity in the area.

- 15.13 The NatureScot response sets out *'we would advise that as a minimum feathering of the turbine blades below cut-in speed is implemented at this site'*). NatureScot guidance notes – *'The reduction in speed resulting from feathering compared with normal idling may reduce fatality rates by up to 50%. As this **option does not result in any loss of output**, as best practice, it is recommended wherever it is practically possible and there remains uncertainty over the risk posed to bats'* and officers will request this be secured by planning condition should the proposal be granted consent by Scottish Ministers. Post-construction surveys are required to aid the monitoring process. This information will feed into further mitigation measures which can be altered accordingly to ensure any negative impacts to foraging / commuting bats is minimal.
- 15.14 The applicant states that neither NatureScot or the Argyll and District Salmon Fishery Board have requested surveys for fish and fresh water pearl mussels and due to no concerns being raised, the applicant does not think it is necessary to include them as part of this application. In fact, Argyll and District Salmon Fishery Board **strongly recommend surveys of migratory salmonid fish** and their habitat are undertaken and fully considered throughout the proposed development and a monitoring program is implemented. Given the identified presence of brown trout parr in Birchen Burn any agreed mitigation measures should be implemented if consent is granted.
- 15.15 Ornithology
NatureScot has provided detailed comments on golden eagle assessments and potential implications for restoration proposals. As well as comments on mitigation for bat populations and the need for species protection plan for reptiles and amphibians, NatureScot provide detailed advice on the requirements for the Biodiversity Enhancement Strategy to ensure significant additional long term biodiversity enhancements are secured in addition to any proposed mitigation/compensation.
- 15.16 The **cumulative effects of wind farms** are having a negative impact on bird species. Appropriate mitigation measures must be implemented to reduce potential impact of bird collision. Research has shown that painting one of the blades black can reduce fatalities. A programme of monitoring should be implemented with results provided to NatureScot, RSPB and Argyll Raptor Study Group. This information will

feed into further mitigation measures which can be altered accordingly to ensure any negative impacts to birds is minimal.

15.17

The LBO notes the Applicant is in discussions with SEPA and NatureScot. SEPA have submitted an objection but will reconsider should the proposal be modified to avoid impacting deep peat. The LBO asks that these discussions continue. As per NPF4 Policy 5, the mitigation hierarchy should be adhered to, with areas of deep peat avoided in the first instance.

15.18 **Having due regard to the above due to outstanding information relating to deep peat, priority peatland habitats and further information required by SEPA and NatureScot it is not possible to reach a conclusion on whether the proposal is consistent with the provisions of Policies 11 – Energy, 3 Biodiversity, 5 – Soils and Policies 30 – The Sustainable Growth of Renewables of and 79 – Protection of Soil and Peat Resources of LDP2. If consent is granted the conditions recommended by NatureScot, SEPA, and the Local Biodiversity Officer should be included.**

16. TREES, WOODS, AND FORESTS

16.1 Policy 11 – Energy of NPF4 requires that project design and mitigation will demonstrate how impacts on trees, woods and forests have been addressed. Policy 6 – Forestry, woodland, and Trees of NPF4 intent is to protect and expand forests, woodland, and trees. Policy 77 – Forestry, Woodland, and Trees of LDP2 states that there is a strong presumption in favour of protecting woodland resources. Policy 78 – Woodland Removal of LDP2 states that proposals that involve the removal of woodland resources will be assessed against the criteria for determining the acceptability of woodland removal, in accordance with the Scottish Government's Control of Woodland Removal Policy. Where this assessment concludes that compensatory planting would be appropriate, developers will need to provide for this in accordance with the advice in the Scottish Government's Control of Woodland Removal Policy.

16.2 The permanent woodland loss for the new access tracks and upgrading of existing tracks as part of the proposal is 32.92ha. The applicant notes that the proposed BES would demonstrate that the proposed Conversion of 21.68 ha of forest to peatland restoration is restorable to a functional Priority Peatland Habitat.

16.3 The wind farm commitment to replant on site is limited to 7.39 ha which is less than 7% of the total Sandbank Forest Plan (FP) and Auchamore forest areas. The replanting will form part of the revised FPs which will adhere to the UKFS species and age class diversity. Confirmed proposed restocking includes 0.74ha native broadleaves in line with the UKFS minimum of 5% native broadleaves. The replanting with native broadleaved trees under the control of the wind farm would be from the Provenance Region 10 and Native Seed Source Zone 106. Confirmed 7.39 ha replanting on site with Sitka spruce and other conifer will meet UKFS requirements to not exceed 65% of any single species. Confirmed that for the proposed contiguous area of clear felling, a phased restocking plan spread out over 5 years to deliver age class diversity. The planned timing for felling for construction, governed by the grid connection date, is anticipated as 2029. Replanting would normally follow within two years therefore the wind farm replanting on site would be 2031. The adjacent areas were replanted in 2015 and 2022 so the age diversity should be achieved without spreading out the replanting of the relatively small 7.39 ha.

16.4 Scottish Forestry have raised no concerns with the proposals in relation to the commercial forestry. However, The Planning Authority's Local Biodiversity Officer has raised concern at the loss of 1.08ha ancient woodland and native trees as a result of the proposal. It is not possible to mitigate the loss of ancient woodland. Tree surveys are therefore requested should consent be granted in order to protect these biodiversity elements.

16.5 Having due regard to the above, the proposal is consistent with the provisions of Policies 11 – Energy and 6 – Forestry, woodland, and Trees of NPF4, and Policies 30 – The Sustainable Growth of Renewables; 77 – Forestry, Woodland, and Trees and 78 – Woodland Removal of the LDP2

17. MINERALS

17.1 Policy 33 – Minerals of NPF4 states that proposals for borrow pits will only be supported where the proposal is tied to a specific project and is time-limited, the proposal complies with the mineral extraction criteria in Policy 33 taking into account the temporary nature of the development, and appropriate restoration proposals are enforceable and Policy 31 – Minerals of LDP2 states that proposals for mineral extraction will generally be supported for borrow pits where the proposal is found to be acceptable after being assessed against NPF4 Policy 33 criterion e).

17.2 No borrow pits are proposed as part of this proposed development. Provided all peat management is undertaken in line with best practice guidance the proposal is consistent with the provisions of Policy 33 – Minerals of NPF4 and Policy 31 – Minerals of LDP2 in this regard, subject to a condition to secure details of the borrow pit and a borrow pit restoration plan.

18. DECOMMISSIONING, SITE RESTORATION AND QUALITY OF SITE RESTORATION PLANS

18.1 Policy 11 – Energy of NPF4 requires that project design and mitigation demonstrate how the decommissioning of developments, including ancillary infrastructure, and site restoration have been addressed. It also requires that project design and mitigation demonstrate how the quality of site restoration plans have been addressed including the measures in place to safeguard or guarantee availability of finances to effectively implement those plans. Policy 30 – The Sustainable Growth of Renewables of the LDP2 requires consideration to be given to the long-term environmental management of the site.

18.2 The proposal is expected to operate for up to 50 years following which decommissioning of the wind turbines and other infrastructure and site restoration would be undertaken as required. Any alternative to this action would be subject to a further consenting process.

18.3 It is recommended that this matter is covered by planning conditions consistent with other projects across Argyll & Bute if the proposal obtains consent from the ECU.

18.4 Having due regard to the above it is concluded that subject to an appropriate condition being attached if the proposal receives consent the proposal is consistent with the provisions of Policy 11 – Energy of NPF4 and Policy 30 - The Sustainable Growth of Renewables of the LDP2

19. CUMULATIVE IMPACTS

- 19.1 Policy 11 – Energy of NPF4 requires that project design and mitigation will demonstrate how cumulative impacts have been addressed. Policy 30 – The Sustainable Growth of Renewables of the LDP2 also requires cumulative impacts to be addressed. Any cumulative impacts which have been identified are covered in the preceding sections of this report.

20. RENEWABLE ENERGY GENERATION TARGETS AND GREENHOUSE GAS EMISSIONS REDUCTION TARGETS.

- 20.1 Policy 11 – Energy of NPF4 requires that, in considering the impacts of the proposal, significant weight will be placed on the contribution of the proposal to renewable energy generation targets and on greenhouse gas emissions reduction targets. Policy 1 – Tackling the climate and nature crises of NPF4 requires that when considering proposals significant weight will be given to the global climate and nature crises. Policy 30 – The Sustainable Growth of Renewables of LDP2 requires all renewable developments to be assessed against the scale of contribution to renewable energy generation targets and greenhouse gas emissions.
- 20.2 Renewable Electricity Generation - Both UK and Scottish Government energy policy recognises the need for substantial increases in renewable energy generation if the transition towards net zero is to be achieved. The proposed turbines will have a combined rated output of around 50.4 MW. A battery energy storage system will also be installed with a capacity of up to 23 MW giving a total capacity for the proposal of around 73.4 MW. The prospective electricity generation from the proposed wind turbines equates to the annual power consumed by up to approximately 58,212 average Scottish households.
- 20.3 Greenhouse Gas Emissions – The proposal would reduce greenhouse gas emissions through replacing fossil fuel generation. The length of time a wind turbine needs to be in operation before it has, by displacing fossil fuel energy generation, avoided as much carbon dioxide as was released in its lifecycle is known as the carbon payback period. A carbon balance assessment has been undertaken using the Scottish Government’s carbon calculator. The results show that the wind farm component of the proposal is estimated to produce annual carbon savings of approximately 37,288 tCO₂ yr⁻¹ (Grid-mix of electricity) tonnes of carbon dioxide equivalent emissions per annum if a grid mix of electricity generation were used as the counterfactual position. The carbon assessment indicates that the carbon emissions payback time would be approximately 2.4 years when compared against a grid mix electricity generation.
- 20.4 The proposal is evaluated to have an overall beneficial effect on the carbon emissions associated with energy production, however it is noted that the effects on the removal of deep peat are not adequately covered in these calculations given the lack of information on these elements of the proposal. In addition, it is noted that this is a relatively small contribution towards energy generation targets of 50mw (plus 23mw storage through the proposed BESS). Officers do not consider that the generation capacity of this proposal warrants the significant landscape and visual effects to this sensitive receiving environment (as set out in Chapter 7 above).

20.5 Having due regard to the above it is considered that the proposal is consistent with the provisions of Policies 1 – Tackling the climate and nature crisis and 11 – Energy of NPF 4, and Policies 30 – The Sustainable Growth of Renewables and 04 – Sustainable Development of LDP2 in respect to renewable energy generation targets and greenhouse gas emissions reduction targets.

21. GRID CAPACITY & ENERGY STORAGE

21.1 Policy 11 – Energy of NPF4 requires that grid capacity should not constrain renewable energy development. It is for developers to agree connections to the grid with the relevant network operator. Furthermore, that proposals for all forms of renewable, low-carbon and zero emissions technologies will be supported, which include energy storage. Policy 30 – The Sustainable Growth of Renewables of LDP2 requires the Planning Authority to have regard to the opportunities for energy storage.

21.2 Grid Capacity - Connection to Electricity Grid - The electrical power produced by the individual wind turbines (as well as that stored in the BESS) will be transmitted to the proposed Substation via underground cables. A connection to the national grid's electricity system will be required which the applicant does not yet have an offer for. The grid connection does not form part of the Proposed Development and is not the subject of the Application. A separate Section 37 application under the 1989 Act will be made to the Scottish Ministers by Scottish and Southern Energy Networks (SSEN).

21.3 Energy Storage is proposed that 2 hr battery storage (rated power of approximately 23 MW and energy storage capacity of 53 MWh) and other electrical equipment would be located within the SSEN construction compound, once the substation construction has been completed. There would be two entrance points to the compound for fire safety and easier BESS installation. The batteries would store excess generated power and provide grid support services.

21.4 Having due regard to the above it is considered that the proposal is consistent with the provisions of Policy 11 – Energy of NPF 4, and Policy 30 – The Sustainable Growth of Renewables of the ABLDP2 in respect to Grid Capacity and Energy Storage.

22. PERPETUITY

22.1 Policy 11 – Energy of NPF4 requires that consents for proposals may be time limited. Areas identified for wind farms are, however, expected to be suitable for use in perpetuity. It is acknowledged that areas identified for wind farms are expected to be suitable for use in perpetuity. However, as the expected operational life of the proposal is 50 years from the date of commissioning, should consent be granted, Officers would expect it to be time limited to 50 years to reflect the life of the wind farm as detailed in the EIAR.

23. CONCLUSION

23.1 This proposal is classed as “Strategic Renewable Electricity Generation” - a National Development, in terms of the Spatial Strategy given its capacity to generate and store more than 50MW. In principle, there is support for this scale of development

given its importance in the delivery of Scotland's Spatial Strategy. However, such projects are still required to be assessed against the provisions of the Development Plan, which consists of NPF4 and LDP 2.

- 23.2 The lead Development Plan policies support renewable energy development in principle but require proposals to be assessed against the criterion detailed in this report. While the weight to be given to each of the considerations is a matter for the decision maker, NPF4 is clear that significant weight will require to be placed on the contribution of the proposal to renewable energy generation targets and on greenhouse gas emission reduction targets. However, a balance still requires to be reached in terms of the impact of the development and NPF4 must be read as a whole.
- 23.3 In relation to landscape and visual impacts NPF4 Policy 4c (Natural Places) – sets out that development that will affect a National Park will only be supported where:
- i. *The objectives of designation and the overall integrity of the areas will not be compromised; or*
 - ii. *Any significant adverse effects on the qualities for which the area has been designated are clearly outweighed by social, environmental or economic benefits of national importance.*

Following a detailed assessment of this application, it is considered that this proposal would have a significant landscape and visual impact on the National Park and on the distinctive seascapes and landscapes of the Firth of Clyde to the extent that the significant and adverse effects would compromise the objectives of the designation and the overall integrity of the area. There will also be extensive significant townscape effects and residential amenity impacts. For clarity, it is also not considered that this relatively small-scale proposal in terms of energy generation will be outweighed by social, environmental or economic benefits of national importance.

- 23.4 NPF4 Policy 11 advises that project design and mitigation will demonstrate how significant landscape and visual impacts are addressed - recognising that such impacts are to be expected for some forms of renewable energy and that where impacts are localised and/or appropriate design mitigation has been applied, they will generally be considered to be acceptable. It is not considered that this proposal is able to be effectively mitigated due to the prominence of the site and the scale of the proposed development. This conclusion is supported by statutory consultees NatureScot and Loch Lomond and the Trossachs National Park Authority. As such the Planning Authority **objects to the proposal on landscape and visual impact grounds**.
- 23.5 In relation to impacts on deep peat and priority peatland habitats, NPF4 Policy 5 – Soils states that 'Where development on peatland, carbon-rich soils or priority peatland habitat is proposed, a detailed site-specific assessment will be required'. In addition, Policies 30 and 79 of LDP2 seek to assess applications against their impacts on carbon rich soils, advising that development that would potentially have a significant adverse effect on peat structure and function will not be supported. As there are unresolved issues in relation to impacts on deep peat, impacts on priority peatland habitats and in relation to the contents of the Peat Landslide Hazard Risk Assessment, as set out above, it is recommended that the Planning Authority objects to the proposal on the grounds that it is not possible to reach a conclusion on the proposal's acceptability in this regard at this time.

- 23.6 Historic Environment Scotland have submitted a holding objection based on potential significant effects on Scheduled Monuments (Ardnadam, settlement, chapel and enclosure (SM3235) and Adam's Cave Chambered Cairn (SM6552). Without further information it is not possible to determine whether the proposal is consistent with the provisions of NPF4 Policy 11 – Energy and NPF4 Policy 7 – Historic Assets and Places of NPF4, and LDP2 Policy 30 – The Sustainable Growth of Renewables. There is an identified significant adverse impact on the setting of Scheduled Monument Dunoon Castle (SM5450) which although not grounds for an objection by HES, would contradict LDP2 Policy 15 – Protection, Conservation and Enhancement of Our Historic Environment; LDP2 Policy 19 – Scheduled Monuments and LDP2 Policy 21 – Sites of Archaeological Importance. The Planning Authority therefore objects on cultural heritage grounds to this proposal.
- 23.7 There are outstanding objections from NATS and Glasgow Airport. It is therefore not possible to determine whether the proposal is consistent with NPF4 Policy 11 and LDP2 Policy 30 and 43. Should this matter be satisfactorily resolved between ECU and NATS/Glasgow Airport the Council's objection would be withdrawn. Should this issue not be resolved the Council would defer to NATS/Glasgow Airport (or any other body appointed by the ECU to provide expert guidance on this matter) in the event of an examination by the DPEA.
- 23.8 The Scottish Government gives considerable commitment to renewable energy and encourages Planning Authorities to support the development of wind farms where they can operate successfully in appropriate locations. This is not however blanket support without qualification. In considering the appropriateness of the development, significant weight has been given to these matters.
- 23.9 In conclusion, it is recommended by Officers that the Planning Authority formally objects to this proposal on landscape and visual impact grounds and cultural heritage grounds. Responses by statutory consultees suggest that there are no mitigation measures available to overcome the widespread significant and adverse visual effects of the proposal on national, regional and local landscapes. Further information is required to resolve biodiversity, deep peat, priority peatland impacts, peat landslide risk assessment and aviation objections. Any conditions recommended by consultees should be included in any consent granted by Scottish Ministers.

24. RECOMMENDATION

24.1 That the ECU be notified accordingly that:

- (1) Following advice from NatureScot, Loch Lomond and the Trossachs National Park Authority and the Council's Landscape Consultant Argyll and Bute Council **object** to the proposal on **landscape and visual impact grounds**, as the proposed wind farm would result in extensive significant adverse landscape and visual effects, contrary to NPF4 Policy 11, NPF Policy 4 and LDP2 Policy 30.
- (2) Following advice from SEPA and NatureScot, Argyll and Bute Council **object** to the proposal on **deep peat and priority peatland habitat grounds**, as there are significant outstanding matters contrary to NPF4 Policy 11, NPF Policy 4 and LDP2 Policy 30, 73 and 79. Should this matter be satisfactorily resolved between ECU and SEPA and NatureScot

the Council's objection would be withdrawn. Should this issue not be resolved the Council would defer to SEPA and NatureScot (or any other body appointed by the ECU to provide expert guidance on this matter) in the event of an examination by the DPEA.

- (3) Argyll and Bute Council **object** to the proposal on **Peat Landslide Hazard Risk Assessment** as there are significant outstanding matters contrary to NPF4 Policy 11, NPF Policy 4 and LDP2 Policy 30 and 79. The applicant has not provided an updated report as requested by the ECU. Argyll and Bute Council **object** unless this issue is resolved to the satisfaction of Ironside Farrar prior to the determination of this application by the ECU. Should this issue not be resolved the Council would defer to Ironside Farrar (or any other body appointed by the ECU to provide expert guidance on this matter) in the event of an examination by the DPEA.
- (4) Following advice from Historic Environment Scotland (HES), Argyll and Bute Council **object** to the proposal based on **cultural heritage impacts** as there are significant effects on the setting of the Scheduled Monument Dunoon Castle and inconclusive effects on other scheduled monuments contrary to the provisions of NPF4 Policy 7 and LDP2 Policy 19. Should this matter be satisfactorily resolved between ECU and HES the Council's objection would be withdrawn. Should this issue not be resolved the Council would defer to HES (or any other body appointed by the ECU to provide expert guidance on this matter) in the event of an examination by the DPEA.
- (5) Following advice from NATS and Glasgow Airport, Argyll & Bute Council **object** to the proposal based on **aviation impacts contrary to NPF4 Policy 11 and LDP2 Policy 30 and 43**. Should this matter be satisfactorily resolved between ECU and NATS/Glasgow Airport the Council's objection would be withdrawn. Should this issue not be resolved the Council would defer to NATS/Glasgow Airport (or any other body appointed by the ECU to provide expert guidance on this matter) in the event of an examination by the DPEA.
- (6) Argyll and Bute do not object on noise impact grounds, subject to the inclusion of an Operational Noise and Amplitude Modulation Planning Conditions, as recommended by the Council's Noise Consultant, Mott MacDonald, specified in their Review of Evidence – Noise, dated January 2026.
- (7) Argyll and Bute Council do not object on Public Access grounds, subject to the inclusion of a condition requiring the developer to prepare an Access Plan for approval by the Council prior to the commencement of construction.
- (8) Argyll and Bute Council do not object on Roads grounds, subject to the inclusion of relevant conditions, as specified by RIS and Transport Scotland in their consultation response to the ECU.
- (9) Argyll and Bute Council requests that the recommendations of the Council's Local Biodiversity Officer and NatureScot are considered by the ECU. Specifically with reference to the need for mitigation (turbine

feathering) for bats and surveys and mitigation for migratory salmonids, should consent be granted.

- (10)** Argyll and Bute Council requests that all other conditions recommended by consultees are included in any Consent, should it be granted.