

Allt Domhain Wind Farm

Planning Statement

July 2025

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1 INTRODUCTION

Background

- 1.1 This Planning Statement has been prepared to accompany the submission of an application for consent under Section 36 of the Electricity Act 1989 by Energyfarm Allt Domhain Ltd ('the Applicant') to the Scottish Ministers for a proposed renewable energy development comprising 9 wind turbines, and associated infrastructure for a period of 35 years ('the proposed development') on land located approximately 6.15km east of Glenbarr in Argyll and Bute ('the Site').
- 1.2 This Planning Statement outlines the key characteristics and details of the proposed development and summarises the relevant planning policy context, before providing an appraisal of the proposed development against the Development Plan and other relevant material considerations. In doing so, this Planning Statement demonstrates the need for the proposed development and provides justification for the granting of consent.
- 1.3 An Environmental Impact Assessment (EIA) has been undertaken for the proposed development and an Environmental Impact Assessment Report (EIAR) has been submitted as part of this application. This Planning Statement should be read in conjunction with the EIAR submitted and draws evidence from it to demonstrate compliance where applicable.

The Applicant

- 1.4 The Applicant is Energyfarm Allt Domhain Ltd, a Special Purpose Vehicle (SPV) set up and owned by Energiekontor UK Holding Ltd, part of the Energiekontor Group, with the sole purpose of delivering the proposed development.
- 1.5 Energiekontor UK Holding Ltd is a holding company for projects operated by Energiekontor UK Ltd an experienced renewable energy development company, formed in 1999. It develops small to medium-sized onshore wind and solar farms throughout the United Kingdom. The company operates seven existing wind farms in the UK and has obtained planning consent for several further projects. Energiekontor also has several other wind and solar projects at various stages of the development process throughout the UK.
- 1.6 Energiekontor UK Ltd is part of the Energiekontor Group. The parent company, Energiekontor AG, was established in 1990 in Bremerhaven in Northern Germany. It has since grown to become one of the leading wind energy companies in Europe and is active in Germany, France, Portugal, the USA and the UK. The company has obtained consent and built over 170 onshore wind and solar farms in Europe, with a total nominal power of more than 1.5 gigawatts. The company constructed the first 'no-subsidy' wind farm in the UK, Withernwick II in East Riding, Yorkshire.

Purpose of this Planning Statement

- 1.7 Along with Section 36 consent, deemed planning consent is also sought under Section 57(2) of the Town and Country Planning (Scotland) Act 1997 (as amended) (the TCPA).
- 1.8 The purpose of this Planning Statement is therefore to set out the context and rationale for the proposed development and to demonstrate how it accords with the applicable planning policy framework against which the planning application must be assessed. In doing so, the objective of this Planning Statement is to provide clear and robust justification for the granting of consent for the proposed development.

EIA Screening and Scoping

- 1.9 Generally, a proposal is screened against the EIA Regulations to ascertain whether a development would constitute EIA development. The proposed development is of a type described within Schedule 2 of the EIA Regulations as an installation for the harnessing of wind power for energy productions. It is not located within a 'sensitive area' as defined by the EIA Regulations, however the project would exceed both of the applicable thresholds as it involves more than two wind turbines with hub heights of more than 15 metres ('m'). The requirement for an EIA was therefore determined based on whether the project would be likely to give rise to significant effects on the environment by virtue of its size, nature or location. The scale, nature and location of the proposed development were considered such that, in order to allow the environmental impacts of the project to be appropriately considered throughout the application process, an EIA Report would be required.
- 1.10 Pursuant to the provisions of Regulation 17 of the Electricity Act (Environmental Impact Assessment) (Scotland) Regulations 2017, in February 2021 the Applicant submitted an EIA Scoping Report (under the site's previous name of Arnicle Wind Farm) to accompany a request for an EIA Scoping Opinion from the Scottish Ministers. This Scoping Report is included within the EIA Report as Technical Appendix 1.1.
- 1.11 The Scottish Ministers issued their Scoping Opinion in June 2021 which set out the topics to be addressed in the EIA. This Scoping Opinion is included within the EIA Report as Technical Appendix 1.2. Scoping is a voluntary process and the responses received as part of this process are advice associated with the methodologies put forward by the Applicant for the determination and potential for likely significant environmental effects.
- 1.12 The EIA Scoping process therefore provides an accompanying background to the planning context for the policy analysis associated with the proposed development.

Structure of this Planning Statement

- 1.13 This remainder of this Planning Statement is structured as follows:
- **Section 2 – The Proposed Development:** provides a summary of the main components associated with the proposed development, an overview of the Site and its surroundings, as well as a summary of the design evolution;
 - **Section 3 – Renewable Energy Policy Framework:** provides a summary of the wider renewable energy policy context relevant to the proposed development;

- **Section 4 – Legislative & Planning Policy Framework:** outlines and surmises the relevant statutory Development Plan and other material considerations relevant to the proposed development
- **Section 5 – Planning Assessment:** provides a planning appraisal of the proposed development against the relevant provisions of the Development Plan and other material considerations including principle and acceptability of the proposed development;
- **Section 6 – Conclusions:** presents the overall summary and conclusions.

2 THE PROPOSED DEVELOPMENT

Introduction

- 2.1 This section describes the various elements associated with the Site and the proposed development, whilst providing details of what processes will take place at the various stages of the project's lifecycle (construction, operation and decommissioning).

The Site

- 2.2 Spanning approximately 667.48 hectares (ha), the site is situated within the spine of Kintyre approximately 6.15km east of Glenbarr, in Argyll and Bute.
- 2.3 The main windfarm area of the site is situated on a hill side gradually sloping downwards from east to west. The south-eastern extent of the site reaches a maximum elevation of 360m AOD, with the summit of Cnoc Donn (405m AOD) just beyond the site boundary. The eastern boundary of the site meets the boundaries of the Beinn an Tuirc I and II to the east. The western extent of the main wind farm area slopes down to form a valley and meets the eastern extent of the Blary Hill Wind Farm boundary.
- 2.4 The site extends in a corridor fashion to the west around Blary Hill (272m AOD) and Blary Hill wind farm towards the Barr Water and Arnicle. The site access area extends westwards down the Barr Glen connecting with the A83 at two separate points: at Glenbarr village to the south, and north of Glenbarr primary school at the northern point of connection.
- 2.5 The wider landscape comprises of a rolling terrain, the site area and wider landscape to the north, south, and west slopes generally down westwards towards the A83 and coastline. To the east of the site the land rises towards the spine of the peninsula and then slopes eastwards down to the B842 and the peninsula's eastern coastline.
- 2.6 Several watercourses flow from east to west through the main wind farm area of the site, Allt an Tuirc, Allt Domhain (from which the development takes its name), and Allt a' Bhlair. All three watercourses join Abhainn a' Chnocain which flows south to north at the foot of the hill slope to the west of the main windfarm area. This joins the Barr Water at Arnicle and flows east through Glen Barr towards the coast. As such the site is well trained. Multiple additional minor watercourses and drainage ditches flow through the site access area, with the marked Allt an Uamha flowing from Cruach Muasdale to the north as a tributary to the Barr Water.
- 2.7 Further residential properties are scattered within Barr Glen. There is no residential property within the wider area of the site to the north or south of the site, and a small amount of scattered residential property to the east along the B842. Settlements within 10km of the site include Carradale, Saddell and Muasdale.
- 2.8 The nearest trunk road is the A83 which the site boundary extends to and will be used to access the site from the Port of Entry, Campbeltown.

Description of the Proposed Development

- 2.9 The proposed development is illustrated on Figure 3.1a and Figure 3.1b within Volume 2 of the EIA Report and would consist of the following principal components.
- Up to 9 turbines;
 - Associated turbine compound areas including foundations and hardstanding areas for erecting cranes at each turbine location;
 - On-site tracks connecting each turbine;
 - Up to 18 new watercourse crossings and 5 upgraded watercourse crossings (dependent on access option);
 - On-site substation;
 - Underground cables linking the turbines to the substation, typically along internal tracks;
 - A crossing of the Barr Water, should the relevant access option be adopted;
 - A temporary construction compound including provision for onsite concrete batching; and
 - Outline Habitat Management provisions as proposed within Technical Appendix 7.6 within Volume 4 of the EIA Report.
- 2.10 The proposed development would be time-limited to 35 years from the first date of final commission. The construction phase would last approximately 18 months and decommissioning would last approximately six months.
- 2.11 **Deemed planning permission is sought to permit a period of ten years between the date of the Decision Notice and expiry of consent (should works not be commenced) rather than the usual three years. This is to accommodate any potential grid delays.**
- 2.12 The proposed development would provide approximately 64.8MW of installed capacity based on a candidate turbine of up to 7.2MW (depending on the final turbine model chosen). It is estimated by the Applicant that this installed capacity could generate approximately 249,671MWh of renewable electricity each year which would be expected to power the equivalent of approximately 72,117 homes on average each year¹, or provide 1.38 million full battery charges for electric vehicles per year².
- 2.13 The planning application includes an allowance for micrositing of the wind farm infrastructure. If planning permission is granted, the Applicant will commission detailed ground investigations and geotechnical surveys to determine the ground conditions. **A 100m micrositing allowance is sought for the wind turbines (with restrictions in place to safeguard constraint buffers as applicable), and all other new elements of the proposed development.**
- 2.14 The principal elements include:

¹ Based on an average annual UK domestic electricity consumption figure of 3,462KWh as set out in the BEIS publication "Energy Consumption in the UK" July 2023

² Based on a large electric vehicle requiring 180kWh for a full charge.

- **Wind turbines** – 9 wind turbines (see Figure 3.2a & 3.2b within Volume 2 of the EIA Report for typical wind turbine elevations). The co-ordinates of the turbines are given in Table 1 below;
- **Turbine foundations** – The foundations of the turbines could be either reinforced concrete gravity structures or piled foundations. This would be dependent on the ground and hydrological conditions at the turbine location which would also determine the overall size of the support structure. Typical foundations for the size of turbine proposed are shown in Figure 3.3 within Volume 2 of the EIA Report;
- **Crane hardstandings** – To provide a level and firm base for the cranes at the location of each turbine. Each would be approximately 180m x 70m depending on the turbine model chosen and would be surfaced with coarse aggregate (see Figure 3.7 for a typical crane hardstanding layout);
- **Site tracks** – The total length of new or upgraded track will be dictated by the access route as two options are currently proposed within the application. The total length of track will be approximately 11.07km should the northern access option be realised, or 10.85km should the southern access option be realised. Tracks are required for construction and maintenance vehicles to access the substation and wind turbines. These would be constructed at the commencement of the construction phase and would remain in-situ following decommissioning. They would have a running width of approximately 6m, the final width is dependent on turbine supplier requirements. New tracks would feature local widening on corners and would be surfaced with coarse aggregate (see Figure 3.4 for typical track cross sections). Site tracks include new sections of track and upgrading of existing access tracks. New sections of track across areas of peat deeper than 1m would be floated, comprising a total of approximately 2.01km of floating track. Turning heads would also be required to facilitate the delivery of turbine components.
- **High voltage and control cables** – To form power and control circuits linking each turbine to the on-site substation, cables would be placed in trenches (dimensions to be determined by the ground conditions but typically 0.5m wide by 1m deep) routed alongside the tracks (see Figure 3.8 for typical cable trench construction details).
- **Construction compound/storage area** – The compound to facilitate construction of the proposed development, which would also provide a storage area for plant and materials and is temporary during the construction phase (see Figure 3.6 for a typical compound design);
- **Bridge crossing of Barr Glen water** – A proposed bridge crossing is required to cross the Barr Water should the northern route be used. An outline design can be found within Figure 3.12 of Volume 2 of the EIA Report, with final detailed design subject to planning condition; and
- **Substation building** – Up to 90m x 90m space would be required for the construction of an up to 132kV substation (with detail to follow within an appropriate condition).

Wind Turbines

- 2.15 Turbines would be of tubular steel construction, finished in a typical off-white matt colour and comprise of three blades. The final turbine choice would be made post-consent during the procurement phase, but for the purposes of this application, representative candidate turbines of both 200m and 230m to tip are considered. The turbine rotor

diameter for all 9 turbines is 162m. Turbines at 200m to tip will have a hub height of 119m, turbines at 230m to tip will have a hub height of 149m. The below Table 1 details which turbines are proposed at the varying heights.

- 2.16 Turbine co-ordinates, subject to a maximum of 100m micro-siting dependent upon localised constraints, are as follows within Table.

Table 1: Proposed Wind Turbine Coordinates (subject to a 100 m micrositing allowance)

Turbine	Easting	Northing	Tip Height (m)
1	173287	637554	200
2	174290	637477	200
3	172966	637216	200
4	173652	637178	200
5	172627	636885	230
6	172647	636426	230
7	173276	636755	230
8	172831	635995	230
9	173270	636298	230

- 2.17 To carry the power generated to the local electricity network, each turbine would require a transformer to step up to a high voltage. Transformers will be internal to the turbine.
- 2.18 Monitoring and controlling the performance of the wind turbines would be achieved by way of a sophisticated Supervisory Control and Data Acquisition (SCADA) system. The SCADA system would gather data from all the turbines and provide the facility to control them from a remote location. Communication cables connecting to each turbine would be buried in the electrical cable trenches to facilitate this.

Access

- 2.19 There are two options for accessing the site. These are generally referred to throughout the EIA as the northern route or the southern route, and can be viewed on Figure 3.1 within Volume 2. The Applicant has sought to provide environmental assessment of both routes within this EIA Report, and seeks to demonstrate both could be used subject to appropriate conditions. For the avoidance of doubt however, the Applicant will seek a condition which limits the final choice of route to be used and it is intended that only one will be used when any future consent is implemented.

Overview of Northern Route

- 2.20 The northern route would exit the A83 from a newly formed junction (see Figure 3.11 and Chapter 12: Transport and Access within the EIA Report). It would use the contours of the existing farmland to take the line of best fit westwards to eastwards, with a new crossing of the Allt an Uamha required. At the northern extent of the site, again using the gradient and with minor earthworks as required, the track would incorporate an 's-bend'

southwards, following a minor informal track to then cross the Barr Glen road. A new crossing of the Barr Water is then required (see Figure 3.12 within the EIA Report). The track would then follow field boundaries to minimise impacts upon agricultural operations, to then move uphill to the south (towards Blary Hill) to then meet the potential southern route (which would not be built in the event of the northern route being used) and then entering the wind farm area (as per Figure 3.1a within Volume 2 of the EIA Report).

- 2.21 If the northern route was used, this would comprise the construction of approximately 6.92km of new cut track, with floating track not required. When added to the wind farm area track requirements (4.15km of new cut track and 2.01km of new floating track) the overall requirement would be for 11.07km of new cut track and 2.01km of new floating track; a total of 13.08km in total.
- 2.22 This route would require up to eighteen new watercourse crossings in addition to the four new watercourse crossings required within the wind farm area.
- 2.23 Justification for its inclusion and the design considerations around access are contained within Chapter 4: Design Evolution of the EIA Report as well as the Design and Access Statement. In brief, a new track is the clear preferred option of the residents of Glenbarr and would avoid disruption during construction and operation.

Overview of Southern Route

- 2.24 The southern route would use the existing Major's Field within the village of Glenbarr, operating the same route as RES' Blary Hill scheme, progressing down the existing Barr Glen road before using the Blary Hill wind farm entrance. Abnormal loads would continue through the entrance and use existing track until the point where the existing track bends southwards to facilitate the Blary Hill Wind Farm. Instead of following this track, a new track would be constructed straight from west to east, to then take a high and relatively straight line towards the point where the two access options meet (refer to Figure 3.1b).
- 2.25 If the southern route was used, in addition to the 4.15km of new cut track and 2.01km of floating track within the wind farm area, approximately 2.49km of new cut track would be required (to the east of Blary Hill), and dependent upon further detailed study to be conditioned, potential upgrading of 4.21km of the Barr Glen road including a series of passing places and traffic management provisions.
- 2.26 In addition to the four new watercourse crossings within the wind farm area, the southern route option would incorporate eight new watercourse crossings and five upgraded watercourse crossings.
- 2.27 **Micrositing of 100m is sought for tracks as well as turbine positions in order to optimise post-Ground Investigation design and avoid any unforeseen constraints and minimise cut and fill.**

3 RENEWABLE ENERGY POLICY FRAMEWORK

Introduction

- 3.1 This section of the Planning Statement provides an overview of the renewable energy legislative and policy framework relevant to the proposed development. It covers International, European, UK and Scottish energy policy and legislation. It provides an overview of the relevant international agreements and targets which set the policy criteria for national energy policy and guidance.
- 3.2 The framework outlined under the respective subheadings below demonstrate clear and consistent policy support for renewable energy, as well as the need for further transition to low carbon electricity generation. There is firm support for onshore wind developments as part of a diverse energy strategy, with an overarching intention that renewable energy developments will make significant a contribution to achieving the legally binding renewable energy targets established by the renewable energy policy framework.
- 3.3 An emphasis on Net Zero and Climate Emergency at UK, Scottish and Argyll and Bute level places significant weight on the overarching policy and legislative framework as a material consideration.

UK Energy Policy

- 3.4 The UK Government is legally committed to the delivery of a reduction in emissions to 'net zero' by 2050 (with the Scottish Government committing to 2045).
- 3.5 This section identifies recent shifts in UK-wide Renewable Energy Policy to accommodate this and summarises some key documents including:
- The Clean Power 2030 Action Plan (December 2024)
 - The CCC Annual Report to UK Parliament (July 2024);
 - National Audit Office report 'Achieving Net Zero' (December 2020);
 - The UK's Sixth Carbon Budget (December 2020);
 - The UK Energy White Paper (December 2020); and
 - The UK Net Zero Strategy (October 2021).

The Clean Power 2030 Action Plan

- 3.6 The Clean Power 2030 Action Plan, published in December 2024 by the UK Government, clearly highlights the requirement for rapid deployment of new clean energy capacity across the whole of the UK. The document reflects the shared renewable ambitions of the UK, Scottish and Welsh Governments and in accepting the government's central role in steering the creation of this new energy system, the document sets out the expectations for the 2030 capacities of key technologies at national and regional level.

- 3.7 Focusing on onshore wind specifically, the target set out within the document aims for 27-29 GW of capacity. Combined with large targets for other technologies such as solar and offshore wind, the key aim is to significantly reduce dependence on fossil-fuels – particularly gas.
- 3.8 In order to deliver the capacity, there is a requirement to deploy these technologies at a very significant scale and pace, which can only be delivered by taking rapid action to unblock delivery challenges. The ability to maximise the efficiency of the electricity system today and in future, is critical to delivering decarbonisation and a key step to achieve net zero by 2050.
- 3.9 Whilst the proposed development is unlikely to meet the 2030 target date for generation of clean power, it is clear that onshore wind forms a key part of the clean power mix for 2030 and beyond to 2035.

The CCC Annual Report to UK Parliament (July 2024))

- 3.10 The CCC published a landmark report entitled 'Net Zero – UK's Contribution to Stopping Global Warming in May 2019. The foreword sets out that *"the CCC has reviewed the latest scientific evidence on climate change, including last year's IPCC special report on global warming of 1.50C and considered the appropriate role of the UK in the global challenge to limit future temperature increases."* It adds, *"Net Zero is a more fundamental aim than previous targets. By reducing emissions produced in the UK to zero, we also end our contribution to rising global temperatures."*
- 3.11 The report makes recommendations for the UK economy including a new tougher emissions target of net zero green gases by 2050, therefore ending the UK's contribution to global warming within 30 years. This replaces the previous target of an 80% reduction by 2050 from a 1990 baseline and accords with the obligations under the Paris Agreement.
- 3.12 The report makes clear that at a UK level *"current policy is insufficient for even the existing targets."*
- 3.13 In June 2019, the Prime Minister Theresa May brought forward legislation to turn Net Zero into law, and the UK became the first major economy in the world to pass legislation to end its global warming contribution by 2050. The target is now legally binding via the provisions of the Climate Change Act 2008 (2050 Target Amendment) Order 2019.
- 3.14 The CCC Annual Report to Parliament (2020) offered an update on the progress towards Net Zero following adoption of the Net Zero Target.
- 3.15 The report states that in terms of building a resilient post-Covid economy, *"success requires that net zero emissions and improved climate resilience are integral,"* whilst investments towards achieving net zero will *"help create jobs and stimulate economic recovery, whilst changing the course of UK emissions and improving our resilience to climate change."*
- 3.16 The National Audit Office offered an update report 'Achieving Net Zero' in December 2020 regarding progress on achieving Net Zero following the change to legislation in June 2019.

- 3.17 Key points from the report include that reducing emissions to achieve net zero will require wide ranging changes to the UK economy including further investment in renewable energy, changes “*unprecedented in their overall scale.*”
- 3.18 Page 22 of the report sets out that a national fourfold increase in renewable energy capacity is needed.
- 3.19 The CCC set out the Sixth UK-wide carbon budget in December 2020 with recommendations from 2033 to 2037. This sets out the path the UK must follow to achieve Net Zero by 2050.
- 3.20 A key point includes the CCC's clear statement that new demand for electricity will mean that demand will rise 50% by 2035 and perhaps doubling or trebling by 2050.
- 3.21 The UK Energy White Paper in December 2020 set out a major shift in UK policy and highlights the importance of renewable forms of electricity. Page 38 states that a key objective is to “*accelerate the deployment of clean electricity generation through the 2020s*”.
- 3.22 The UK Government then published the UK Net Zero Strategy in October 2021 which sets out the long-term pathway to net zero by 2050, setting out the UK Government's plans to reduce emissions from each sector of the economy. Its sets out within page 103 that the Government will support sustained deployment of low carbon generation and that there is a need to continue to drive rapid deployment of renewables.

Scottish Climate Change and Energy Policy

- 3.23 A climate emergency was declared in Scotland in 2019 by the Scottish Government, with Argyll and Bute Council also declaring a climate emergency in late 2021.
- 3.24 When it was enacted, the Climate Change (Scotland) Act 2009 set world leading greenhouse gas emissions reduction targets, including a target to reduce emissions by 80% by 2050. However, the Climate Change (Emissions Reduction Targets) (Scotland) Act 2019 amends the 2009 Act and sets even more ambitious targets – which reflect the recommendations of the Committee on Climate Change (CCC) for a net zero greenhouse gas (GHG) emissions target by 2045 at the latest, with challenging interim stages – a 75% reduction target by 2030 and 90% by 2040.
- 3.25 This section identifies recent shifts in Scottish Renewable Energy Policy and summarises some key documents including:
- The Scottish Energy Strategy (2017)
 - Draft Energy Strategy and Just Transition Plan (2023)
 - Climate Change (Emissions Reduction Target) (Scotland) Act (2019)
 - Climate Change Committee (CCC) Report to Scottish Parliament – Progress in reducing emissions in Scotland (March 2024)
 - The Update to the Climate Change Plan (December 2020);
 - The Green Industrial Strategy (September 2024)

- The Onshore Wind Policy Statement (2022);
- Onshore Wind Sector Deal (2023); and
- Climate Change Committee Scotland's Carbon Budget (2025).

Scottish Energy Strategy (2017)

- 3.26 The Scottish Energy Strategy 2017 sets out the Scottish Government's overarching position on many forms of energy, including onshore wind. Specifically, it states that “onshore wind must continue to play a vital role in Scotland's future” ...” which can be done in a way which is compatible with Scotland's magnificent landscapes...” These reiterate the findings of the Onshore Wind Policy Statement and aim to drive Scotland towards Net Zero by 2045, with a clear focus on the delivery of 12GW of new installed capacity by 2030.

Draft Energy Strategy and Just Transition Plan (2023)

- 3.27 The Draft Energy Strategy and Just Transition Plan (2023) states that we need to transform the way Scotland generates, transports, and uses energy, in order to realise climate change ambitions. The requirement for an additional 12GW of onshore wind is a key policy facet of this document.

Climate Change (Emissions Reduction Targets) (Scotland) Act 2019

- 3.28 The Climate Change (Emissions Reduction Targets) (Scotland) Act 2019 bill, introduced to Parliament on 23rd May 2018, was subsequently passed in September 2019.
- 3.29 The Bill raises the ambition of further reducing greenhouse gas emissions by amending the targets set out within the Climate Change (Scotland) Act 2009, hence superseding them and sets a legally binding net zero target for all greenhouse gases by 2045. This target date is five years ahead of the current date set for the rest of the UK and aims to ensure Scotland contributes to the worldwide efforts to deliver on the Paris Agreement. It requires net zero by 2045 at the latest.
- 3.30 Whilst the target of net zero for 2045 remains, a statement made by the Climate Change Committee explained that the delay of the governments Climate Change Plan has meant that the goal of achieving a 75% reduction target by 2030 is fundamentally unachievable. As such, on the 18th of April 2024, the Scottish Government stated that:

'In light of the UK-wide Climate Change Committee's (CCC) recent rearticulation that the 2030 target for emissions reduction is not achievable, this will no longer be a statutory target.'

- 3.31 Despite the removal of the 75% emission reduction target, setting a net-zero target by 2045 is an ambitious target and places Scotland at the forefront of efforts to combat climate change.

Climate Change Committee (CCC) Report to Scottish Parliament – Progress in reducing emissions in Scotland (March 2024)

- 3.32 As set out above, the CCC Report presented to the Scottish Parliament entitled 'Progress in reducing emissions in Scotland' in March 2024. The related press release states that Scotland's 2030 climate goals are no longer credible due to continued delays to the updated Climate Change Plan and other related climate policies.
- 3.33 The press release states that a path to Scotland's post-2030 targets remain however stronger action is needed to reduce emissions across the economy. It states that there has been some progress in delivering renewable electricity generation in Scotland with the aim to develop 8-11 GW of offshore wind and 20 GW on onshore wind capacity, both by 2030. However, the report notes that "The growth in onshore wind capacity has slowed and is slightly off track to deliver its 2030 target, which will require operational capacity to more than double." Page 40 states that in terms of onshore wind, Scotland must increase the deployment rate by more than a factor of 4 to an average annual rate of 1.4 GW.

The Update to the Climate Change Plan (December 2020);

- 3.34 In December 2020, the Scottish Government published an update to the Climate Change Plan, covering the period 2018 to 2032, and responding to the new requirement in Scotland to meet net zero by 2045. This is a key strategic document on our green recovery following on from COVID-19. Page 9 in particular sets out the strategic goal of achieving "decarbonisation across the whole energy system, including electricity, transport, industry and buildings" and "integrating climate change action into all of the decisions we make across Government".
- 3.35 The Update sets out the intention to prepare an Energy Strategy in 2021 and an updated Electricity Generation Policy Statement by 2022. Page 19 refers to a 2032 'pathway' whereby decisions take account of benefits across all energy sectors as well as economic and social benefits they create across Scotland. By 2032 it is intended that we will generate at least the equivalent of 50% of our energy from renewable sources. It is stated on page 18, importantly, that "there will be a substantial increase in renewable generation, particularly through new offshore and onshore wind capacity".
- 3.36 The planning and consenting systems are recognised (p78) as remaining a "critical enabler of rapid renewables deployment in Scotland". The Climate Change Plan Update expects that renewable energy generation is expected to increase substantially between now and 2032 with an expectation of the development of between 11 and 16GW of new capacity to meet a rapidly increasing electricity demand.

The Green Industrial Strategy (September 2024)

- 3.37 In September 2024, the Scottish Government published a Green Industrial Strategy (GIS). The Executive Summary sets out the mission of the GIS, which states:

"This Green Industrial Strategy's mission is to ensure that Scotland realises the maximum possible economic benefit from the opportunities created by the global transition to net zero".

3.38 The strategy sets out five opportunity areas for Scotland where identified strengths are most likely to lead to growth and the potential to develop internationally competitive economic clusters. The points focus on maximising Scotland's wind economy, developing carbon capture, utilisation, and storage, supporting the green economy by way of professional and financial services, expanding upon the hydrogen sector and establishing Scotland as a competitive centre for clean energy intensive industries of the future.

3.39 When focusing on onshore wind specifically, it is referred to detail at page 21 where the strategy states:

"Onshore wind is the biggest single technology in Scotland's current mix of renewable electricity generation, comprising 62% of installed capacity.

A thriving onshore wind sector is therefore critical to the decarbonisation in Scotland and the UK. As set out in our 2022 Onshore Wind Policy Statement, Government and industry are focused on delivering at least 20 GW of onshore wind by 2030 (doubling current capacity) and recent pipeline analysis shows that we should be on track to deliver this.

This trajectory is underpinned by the Onshore Wind Sector Deal which sets out a set of specific collaborative actions which include commitments by both the Scottish Government and the onshore wind industry to help deliver the 20 GW ambition.

A supportive policy environment and successful industry collaboration via the Onshore Wind Strategic Leadership Group confirms the shared commitment of Government and industry to achieve this successful and responsible growth.

The onshore wind workforce is highly skilled and opportunities in installation, consulting, operations, and maintenance are anticipated to rise in response to growth ambitions. Specialised engineering consultancy services such as wind farm design and financial due diligence related to onshore developments are expected to grow and offer additional export potential. There is commercial opportunity in circular supply chains related to the UK wind industry. Scotland's established, and now ageing onshore wind assets may also offer opportunities for innovative solutions in remanufacturing, recycling, and decommissioning end of life assets."

3.40 It is evident that in order to progress the Government's objectives with regard to wind energy, clear support for new investment and growth in onshore wind development is needed. Realisation of the economic and social opportunities can only be achieved through the development and consenting of additional wind energy developments. Such deployment will not only be critical towards achieving the net zero target, given the important contribution that wind energy will make in that regard, but will also help deliver the Government's clear green infrastructure mission.

The Onshore Wind Policy Statement (2022)

3.41 The Onshore Wind Policy Statement (OWPS, 2022) replaces the previous version published in 2017 and makes it explicitly clear that seeking greater security of supply and lower cost electricity are now key drivers alongside the need to deal with the climate emergency. It requires a minimum installed capacity of 20GW of onshore wind by 2030, requiring an additional 12GW installed between 2023 and 2030.

- 3.42 The OWPS states that deployment of onshore wind is “mission critical for meeting our climate targets” as an “affordable and reliable source of electricity generation.”

The Onshore Wind Sector Deal (2023)

- 3.43 The Onshore Wind Sector Deal, published in September 2023, provides a framework of commitments between Scottish Government and the onshore wind sector in order to support the rapid development and deployment of onshore wind, including the identification of barriers and potential solutions and actions to, for example, decrease consenting times. It is very clear that the Scottish Government wishes to see quicker deployment of onshore wind and is actively supporting the sector to do so.

Compliance with and Weight to be Afforded to Energy Legislation and Policy

- 3.44 The scale of the threat we face through climate change is widely acknowledged by governments across the world. The Scottish Government has recently taken the decision to declare a climate emergency, citing the need for world action to deliver transformative change. Everyone has a role to play in this global climate emergency, including businesses and local authorities. Extremely challenging targets have been set for decarbonising the economy: net zero emissions for Scotland by 2045, the most stringent target for decarbonisation anywhere in the world.
- 3.45 It is evident that there remains a strong policy drive to continue to develop renewable energy. International and national commitments have been made to address the effects of climate change and to achieve greater security in the domestic supply of energy. This in turn has directly influenced a response through the land use planning system which through national planning policy strongly encourages renewable energy development and the evidence base demonstrates that wind energy is the key renewable resource for Scotland.
- 3.46 In the balance of material considerations it is the role of the decision maker in terms of which weight to assign to each material consideration and then potentially groups of material considerations thereafter.
- 3.47 What is clear is that at a global, European, UK and Scottish level, there is a clear and determined effort to reduce global carbon emissions. It is also abundantly clear that onshore wind energy has a very significant part to play in this. Taken and read as a whole, there is a very clear policy priority upon the deployment of renewable technology.
- 3.48 The planning system (and its decision makers) is a critical enabler of this deployment. As per the next section of this Planning Statement, planning policy (and particularly local policy) cannot keep pace with the rate of change in climate change policy and legislation however that should not mean that this becomes a barrier to deployment. It is legitimate for the planning system to take account of updated and emerging issues as material considerations in arriving at a decision.
- 3.49 The current weight to be afforded to the preceding matters is therefore, in the Applicant's view, significant.

4 NATIONAL AND LOCAL PLANNING POLICY

FRAMEWORK

Introduction

- 4.1 This section sets out the planning policy framework relevant and material to the determination of the application in reference to the Development Plan.

Development Plan

- 4.2 The statutory Development Plan applicable to the proposed development consists of the adopted Argyll and Bute Local Development Plan 2 2024 (LDP2), along with the National Planning Framework 4.
- 4.3 The national and local policy landscape shifted somewhat with the adoption on 13th February 2023 of the National Planning Framework 4 (NPF4), with national policy forming part of the statutory Development Plan for the first time.
- 4.4 A key provision legislated within section 13 of the Planning (Scotland) Act 2019 is that Section 24 of the Town and Country Planning (Scotland) Act 1997 is now amended to state that in the event of any incompatibility between a provision of NPF4 and the provision of an LDP, then whichever of them is later will prevail.
- 4.5 In this rare occasion, NPF4 is older than the LDP2, however LDP2 was prepared in accordance with NPF4 and there are no fundamental policy misalignments.

NPF4

- 4.6 The Scottish Government is clear and unequivocal about the requirement for new onshore wind generation through legislation and policy.
- 4.7 The inclusion of 'Strategic Renewable Electricity Generation and Transmission Infrastructure' as a 'national development' demonstrates the importance that the Scottish Government places upon the increase in onshore renewable generation. Annex B of NPF4 provides a statement of need. This states that "*a large and rapid increase in electricity generation from renewable sources will be essential for Scotland to meet its Net Zero emissions targets*".
- 4.8 Wind farms in excess of 50MW generating capacity will comprise national development. The proposed development, at 64.8MW exceeds this threshold and therefore be classed as a national development. Page 97 of NPF4 sets out that national developments are described as "*significant developments of national importance that will help to deliver the spatial strategy*". It adds that "*their designation means that the principle for development does not need to be agreed in later consenting processes*".

- 4.9 There is and remains a clear support at a national level for the further development of renewable and low carbon technologies however greater emphasis has been placed on the pace at which these technologies are rolled out. It is then appropriate to examine the contents of particular policies of NPF4.
- 4.10 **Policy 1: Tackling the climate and nature crises** acts as an overarching policy which in turn filters into each individual policy detailed within NPF4, stating that when considering all development proposals, significant weight should be given to the global climate and nature crises, in order to ensure that they are recognised as a priority in all plans and decisions.
- 4.11 The intent behind Policy 1 is to encourage, promote and facilitate development that addresses the global climate emergency and nature crisis. The proposed development inherently seeks to address the climate crisis by providing low carbon energy and reduces greenhouse gas emissions by contributing to a more sustainable energy mix across Scotland.
- 4.12 Therefore, NPF4 introduces a key, prominent policy which states that the global climate emergency is a priority and significant weight must be attached to this. Onshore wind, as a national development, accords fully with the aspirations of this policy and can draw immediate and full support.
- 4.13 **Policy 2: Climate change and Mitigation** aims to encourage, promote and facilitate development that minimises emissions and adapts to the current and future impacts of climate change. Policy 2 states:
- a) Development proposals will be sited and designed to minimise lifecycle greenhouse gas emissions as far as possible.*
 - b) Development proposals will be sited and designed to adapt to current and future risks from climate change.*
 - c) Development proposals to retrofit measures to existing developments that reduce emissions or support adaptation to climate change will be supported.*
- 4.14 **Policy 3: Biodiversity** requires that “development proposals contribute to the enhancement of biodiversity, including where relevant restoring degraded habitats and building and strengthening nature networks”, integrating “nature-based solutions where possible”. It states that for national developments, proposals will only be supported where it can be demonstrated that the biodiversity resource is in a “demonstrably better state than without intervention”. The measures taken to do this must “be proportionate to the nature and scale of development” with those measures being able to be “secured within a reasonable timescale with reasonable certainty”.
- 4.15 **Policy 4: Natural Places** of NPF4 reinforces the need for the protection, restoration and enhancement of natural assets making best use of nature-based solutions. Part a) of this policy states that development proposals which would have an unacceptable impact upon the natural environment by virtue of type, location or scale will not be supported.
- 4.16 Criteria is provided for proposals that impact upon European or national designations, such as SACs, SPAs, National Parks, National Scenic Areas, SSSIs, Ramsar sites. Part d) discusses

impacts upon local designations and states where a site is designated as a “local nature conservation site or landscape area in the LDP, it will only be supported where development will not have significant adverse effects on the integrity of the area and qualities for which it has been identified”. Part ii) of d) states the second criteria for support, which is where “*any significant adverse effects on the integrity of the area are clearly outweighed by social, environmental or economic benefits or at least local importance*”.

4.17 Part e) states that the precautionary principle is to be applied.

4.18 Part f) states that development proposals that are likely to have an adverse effect upon species protected by legislation will only be supported where it meets the statutory test.

4.19 **Policy 5: Soils** focuses on the protection of carbon-rich soils, the restoration of peatlands and the minimisation of disturbance to soils from development with wording as follows:

Development proposals on peatland, carbon-rich soils and priority peatland habitat will only be supported for:

- i) *Essential infrastructure and there is a specific locational need and no other suitable site;*
- ii) *The generation of energy from renewable sources that optimises the contribution of the area to greenhouse gas emission reductions targets;*
- iii) *Small-scale development directly linked to a rural business, farm or croft;*
- iv) *Supporting a fragile community in a rural or island area; or*
- v) *Restoration of peatland habitats.*

4.20 The design of the proposed development has aimed to maximise the most amount of renewable energy with the least amount of infrastructure possible. By applying this principle, the proposed development layout, including turbines and associated infrastructure, has been designed to avoid the areas of deep peat identified, wherever possible, and areas where peat landslide may occur.

4.21 **Policy 6: Forestry, Woodland and Trees** states under part c) that proposals involving woodland removal will “*only be supported where they achieve significant and clearly defined additional public benefits in accordance with relevant Scottish Government policy on woodland removal*”.

4.22 **Policy 7: Historic Assets and Places** details under part a) that “*development proposals with a potentially significant impact on historic assets or places will be accompanied by an assessment which is based on an understanding of the cultural significance of the historic asset and/or place*”. Part h) is also useful and relevant, where it is stated that development proposals affecting scheduled monuments will only be supported “where i) direct impacts on the scheduled monument are avoided, ii) significant adverse effects on the integrity of the setting are avoided or iii) exceptional circumstances have been demonstrated to justify the impact on a scheduled monument and its setting and impacts on the monument or its setting have been minimised”.

4.23 The key policy pertaining to energy is **Policy 11: Energy**, which contains the intent to “*encourage, promote and facilitate all forms of renewable energy development onshore*”.

and offshore. This includes energy generation, storage, new and replacement transmission and distribution infrastructure".

- 4.24 At a local level, the policy also states that Local Development Plans (LDPs) should seek to realise their areas' full potential for electricity and heat from renewable, low carbon and zero emission sources by identifying a range of opportunities for energy development.
- 4.25 Policy 11 a) sets out that development proposals for all forms of renewable, low-carbon and zero emissions technologies will be supported, which include:
- i) wind farms including repowering, extending, expanding and extending the life of existing wind farms;*
 - ii) enabling works, such as grid transmission and distribution infrastructure;*
 - iii) energy storage, such as battery storage and pumped storage hydro;*
 - iv) small scale renewable energy generation technology;*
 - v) solar arrays;*
 - vi) proposals associated with negative emissions technologies and carbon capture; and*
 - vii) proposals including co-location of these technologies.*
- 4.26 Policy 11 reiterates support for renewable and low carbon technologies, however there is a clear and direct reference to onshore wind farms, recognising this form of energy generation as a key component to achieving the outcomes of Policy 11 as well as wider overarching climate change policy and legislation which aim to expand renewable, low-carbon and zero emissions technologies at a national level.
- 4.27 While repowering, extensions and expansions are also supported, the creation of new onshore wind development must be supported to ensure there is a continued pipeline of new onshore wind farm schemes, such as the proposed development, which can be revisited for future repowering, extension and expansion. In addition, the policy also includes support for battery storage which has been included as part of the development with 5MW of storage proposed.
- 4.28 Part (c) of Policy 11 states that development proposals will only be supported where they maximise net economic benefit, including local and community socio-economic benefits such as employment, associated business and supply chain opportunities.
- 4.29 Policy 11 (e) provides further information on the topics which should be addressed as part of renewable, low-carbon and zero emissions technologies. It states that:
- In addition, project design and mitigation will demonstrate how the following impacts are addressed:*
- i) impacts on communities and individual dwellings, including, residential amenity, visual impact, noise and shadow flicker;*
 - ii) significant landscape and visual impacts, 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 to be acceptable;*

- iii) *public access, including impact on long distance walking and cycling routes and scenic routes;*
- iv) *impacts on aviation and defence interests including seismological recording;*
- v) *impacts on telecommunications and broadcasting installations, particularly ensuring that transmission links are not compromised;*
- vi) *impacts on road traffic and on adjacent trunk roads, including during construction;*
- vii) *impacts on historic environment;*
- viii) *effects on hydrology, the water environment and flood risk;*
- ix) *biodiversity including impacts on birds;*
- x) *impacts on trees, woods and forests;*
- xi) *proposals for the decommissioning of developments, including ancillary infrastructure, and site restoration;*
- xii) *the quality of site restoration plans including the measures in place to safeguard or guarantee availability of finances to effectively implement those plans; and*
- xiii) *cumulative impacts.*

4.30 Throughout the EIA Report, each topic listed within Policy 11 (e) has been fully assessed

4.31 Policy 11 states that *"in considering these impacts, significant weight will be placed on the contribution of the proposal to renewable energy generation targets and on greenhouse gas emission targets"*.

4.32 A key point of policy is that Policy 11 e) ii) recognises that where some landscape and visual impacts are to be expected, localised impacts and/ or the application of appropriate design mitigation has been employed, then effects are considered to be acceptable.

Argyll and Bute Local Development Plan 2

4.33 The Argyll and Bute LDP2 was adopted in February 2024 and sets out the Council's visions and objectives in order to deliver sustainable and inclusive development whilst meeting wider Scottish Government aims. The LDP2 replaces and supersedes the previous LDP 2015 and its associated Supplementary Guidance.

Overarching Renewable Policy

4.34 The key policy related to renewable energy is Policy 30 – The Sustainable Growth of Renewables which states that *"The Council will support renewable energy developments where these are with the principles of sustainable development principles and it can be 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"*.

4.35 Policy 30 goes on to state a wide range of policy topics upon which proposed renewable energy development must be assessed, including:

- *Impacts on communities and individual dwellings, including visual impact, residential amenity, noise and shadow flicker.*
- *Landscape and visual impacts.*
- *Effects on the natural heritage, including birds.*
- *Impacts on carbon rich soils, using the carbon calculator.*
- *Public access, including impact on long distance walking and cycling routes and those scenic routes identified in the NPF.*
- *Impacts on the historic environment, including scheduled monuments, listed buildings and their settings.*
- *Impacts on tourism and recreation.*
- *Impacts on aviation and defence interests and seismological recording.*
- *Impacts on telecommunications and broadcasting installations, particularly ensuring that transmission links are not compromised. –*
- *Impacts on road traffic.*
- *Impacts on adjacent trunk roads.*
- *Effects on hydrology, the water environment and flood risk.*
- *Cumulative impacts arising from all of the considerations above.*
- *Net economic impact, including local and community socio-economic benefits such as employment, associated business and supply chain opportunities.*
- *The scale of contribution to renewable energy generation targets.*
- *Effect on greenhouse gas emissions. – Impacts on trees, woods and forests."*

4.36 Policy 04 – Sustainable Development also sets out pertinent overarching policy considerations. Amongst its requirements, the policy states that “*developers should seek to demonstrate sustainable development principles*”, such as maximising opportunity for local community benefit, and conserving and enhancing the natural and built environment and avoid significant adverse impacts on biodiversity, natural and heritage assets. The policy also requires that proposals respect the landscape character of an area and the setting and character of settlements, and avoid having significant impacts upon land, air and water environments.

Landscape and Visual

4.37 Policy 05 – Design and Placemaking requires that proposed developments should endeavour to comply with placemaking criteria, including relevant to the proposal, the requirement to be compatible with surrounding land uses, being where practicable, resource efficient by utilising existing infrastructure and respecting site topography and surrounding landmarks or views.

4.38 Policy 08 – Sustainable Siting provides criteria which should apply when assessing any proposal for development. Particularly relevant to the site is that:

- *The development should integrate into the landscape or existing built form to minimise detrimental effects on the environment. Particularly careful attention should be given to hilltop, skyline or ridge locations, where development will only be acceptable if such a location cannot be avoided and any significant adverse landscape and visual effects are clearly outweighed by social, environmental or economic benefits of community wide importance arising from the development proposal, and have been sufficiently mitigated through an environmental impact assessment or landscape and visual impact assessment.*
- *Development on a sloping site should be designed sensitively taking account of the topography in order to prevent significant excavation or under-building and'*
- *The siting of a development should take into account the character of the area in terms of its settlement pattern, layout and density.*

4.39 Policy 10 – Design: All Development provides design guidance for all types of developments, and relevant to the proposed development, includes prescriptions that the proposal must “*demonstrate an understanding of an appropriate response to the proposed development site and wider context, including consideration of character*”.

4.40 Policy 19 states that there will be a “*presumption against development that does not retain, protect, conserve or enhance a Scheduled Monument and the integrity of its setting*”. It states that developments which have an adverse impact upon Scheduled Monuments or their setting will not be permitted unless there are exceptional circumstances. The developer is expected to satisfactorily demonstrate that the effects on the Scheduled Monument and its setting have been assessed, using tools such as setting analysis, design statements and character appraisals where appropriate.

4.41 Policy 70 – Development Impact on National Scenic Areas states that “*Argyll and Bute Council will resist any development, in or affecting, National Scenic Areas that would compromise the objectives of their designation and the overall integrity, or that would fail to safeguard Special Qualities unless it is adequately demonstrated that*

- *Any significant adverse effects on the landscape quality for which the area has been designated are clearly outweighed by social, environmental or economic benefits of national importance*
- *The proposal is supported by an LVIA and has taken into account the content of any relevant Argyll and Bute Landscape Capacity Assessment.”*

4.42 Policy 71 – Development Impact on Local Landscape Areas states that “*Argyll and Bute 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; 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 Local Landscape Area."*

4.43 Policy 72 – Development Impact on Areas of Wild Land is not applicable as it only relates to proposed developments within Wild Land.

Hydrology, Geology and Peat

4.44 Policy 55 – Flooding states that development on the functional flood plain is considered contrary to the objectives of the LDP, subject to detailed criteria held within the policy.

4.45 Policy 59 – Water Quality and the Environment states the criteria upon which proposals for development will be assessed with regard to the potential impact upon the water environment. The Council will actively seek to protect natural watercourse features by preventing or avoiding development on sites where there would be an unavoidably detrimental impact upon a watercourse.

4.46 Policy 79 – Protection of Soil and Peat Resources contains policy provision for the Council to support developments only where appropriate measures are taken to maintain soil resources proportionate to the scale of the development. Development which would have a significant adverse effect on soil resources and functions or peat structure in terms of disturbance, degradation or erosion will not be supported unless it is satisfactorily demonstrated that a) such adverse effects are clearly outweighed by social, environmental and economic benefits of community wide importance and a soil or peatland management plan.

Ecology and Ornithology

4.47 Policy 73 – Development Impact on Habitats, Species and Biodiversity provides guidance on the Council's requirements to adhere to relevant legislation. Part b) states that when considering development proposals, the Council will seek to contribute to the delivery of the objectives and targets set by the Local Biodiversity Action Plan (LBAP) and Scottish Biodiversity Strategy. Part d) states that where there is evidence that a habitat or species of international, national or local importance exists on a development site, the Applicant will be required to submit a specialist survey of the site's natural environment and if necessary, a mitigation plan. The policy also contains criteria upon which impacts on protected species will be assessed.

4.48 Policy 74 – Development Impact on Sites of International Importance contains policy relating to the requirement for Appropriate Assessment and the treatment of significant effects thereafter.

Cultural Heritage

- 4.49 Policy 15 – Supporting the Protection, Conservation and Enhancement of Our Historic Built Environment states that development proposals will not be acceptable where they fail to “*protect, preserve, conserve or enhance the special characteristics and/or cultural significance of the historic built environment in terms of its location, scale, form, design or proposed use, whilst also avoiding “any cumulative effect”*”. Proposals for development which would affect an asset or its setting will be “expected to demonstrate that they would enable positive change by balancing the need to secure the long-term sustainability of the asset against the need to address the impacts of climate change”.
- 4.50 Policy 19 – Scheduled Monuments states that there will a presumption against development that does not retain, protect, conserve or enhance a Scheduled Monument and the integrity of its setting. Developments which have an adverse impact upon Scheduled Monuments or their setting will not be permitted unless there are exceptional circumstances. The developer is expected to satisfactorily demonstrate that the effect of a proposed development on a scheduled monument and its wider setting has been assessed and that measures will be taken to protect, conserve and where appropriate enhance the special interest of the asset.
- 4.51 Policy 21 – Sites of Archaeological Importance provides advice on archaeological heritage and future discoveries found in Argyll and Bute. Key to the policy is the advice when the proposed development would affect a site of archaeological significance, in such that the applicant should consult the planning authority and West of Scotland Archaeology Service and relevant policies and guidance must be conformed to.

Transport and Access

- 4.52 Policy 39 – Construction Standards for Private Access requires that construction standards for private accesses incorporate minimum standards to function safely and effectively as set out in the Council's Road Development Guide, and that accesses which connect to or impact significantly on a Trunk Road will require consultation with Transport Scotland.
- 4.53 Policy 41 – Off Site Highway Improvements requires that in the judgement of the planning authority, where development proposals will significantly increase vehicular traffic on substandard private or public roads, then developments will be required to contribute proportionately to improvements.

Other Issues

- 4.54 Policy 43 – Safeguarding of Aerodromes states the development will not be permitted where it would compromise the safe operation of an aerodrome or constrain their present or future operations.

Argyll and Bute Wind Landscape Capacity Study

- 4.55 The Argyll and Bute LWECS (ABLWECS) was adopted in 2017 and has been used as a key material consideration in the determination of applications for wind energy in Argyll and Bute however it does not form part of the Development Plan. The Scottish Ministers intend

for it to be one of several sources of guidance, as opposed to a key consenting document upon which development proposals for wind energy should be assessed against.

- 4.56 The ABLWECS uses height criteria to determine levels of capacity. 'Very Large' is categorised as over 130m with no upper limit. The minimum turbine height commercially available at the time of writing this Planning Statement is 150m, however modern wind farms tend to operate between 180m and 250m as illustrated by wind farm applications across Scotland and Argyll and Bute in recent years. Therefore, all wind farms will be assessed under the 'Very Large' typology.
- 4.57 Therefore, in reading the ABLWECS a number of caveats should be noted as follows:
- The ABLWECS is not an up-to-date document. The consented Tangy IV Repowering (16 turbines up to 149.9m to blade tip), and other consented wind farms on Kintyre at Airigh (14 turbines up to 149.5m to blade tip), Clachaig Glen (12 turbines: seven with a maximum blade tip height of 185 metres and five with a maximum blade tip height of 200 metres), Eascairt (13 turbines up to 100m to blade tip), High Constellation (10 turbines up to 149.5m to blade tip) and are not included in the baseline. In addition, several wind farms noted as consented in the ABLWECS including Auchadaduie, A'Chruach Extension, Blary Hill and Beinn an Tuirc III are now existing wind farms;
 - The ABLWECS should not replace the need for individual landscape and visual impact assessments and/or Environmental Impact Assessments for individual wind energy developments, which provide detailed and specific assessment of the likely landscape, visual and cumulative effects;
 - The ABLWECS is a broad assessment, and the judgements on sensitivity represent a 'rounding up' or upper level of sensitivity applied across whole LCTs, within which considerable variation can occur;
 - The author of the ABLWECS has provided landscape advice to the Council on a number of schemes where the advice provided has been to not object to windfarms of 180-200m in scale.
- 4.58 The proposed development is situated within Landscape Character Type 6: Upland Forest Moor Mosaic.
- 4.59 The proposed development (all 9 turbines) would be located within the *Upland Forest Moor Mosaic* (6) LCT, as identified in the ABLWECS.
- 4.60 Analysis of the level of compliance between the proposed development and the LWECS is contained within section 5.

5 PLANNING ASSESSMENT

Introduction

- 5.1 Following identification of the relevant planning policies, guidance and other material considerations in Section 4 of this Planning Statement, this section examines how the proposed development accords with the Development Plan, material considerations and other policy guidance considered in this statement.
- 5.2 Having regard to the relevant provisions within the Development Plan and other material considerations, the following determining issues have been identified:
- The principle of the proposed development;
 - The conformity of the proposed development against the Development Plan and supplementary guidance;
 - The acceptability of predicted environmental and other impacts arising from the Proposed Development, as assessed against the relevant Development Plan policies;
 - The consideration of other material considerations that may weigh in support of the proposed development.
- 5.3 These determining issues are considered further under the relevant headings below.

The Principle of the Proposed Development

- 5.4 The proposed development seeks to deliver a sustainable renewable energy development that will make a valid contribution to low-carbon energy targets and net-zero goals.
- 5.5 The Scottish Government is unequivocally clear that it wants to continue to capture and capitalise our natural wind resource and projects such as the proposed development make a significant contribution to achieving the renewable energy generation goals established in national policies, as summarised in Section 3 of this Planning Statement. Furthermore, the proposed development will make an active contribution to achieving the ambitious net zero greenhouse gas target date of 2045, whilst promoting a sustainable form of low carbon electricity generation in the face of the climate emergency declared in 2019.
- 5.6 There is clear policy support for the principle of wind energy across the Development Plan and other material considerations including national policy and legislation. These are concisely summarised below.
- 5.7 By virtue of NPF4's classification of national developments, the proposed development is of national importance given its generating capacity is over 50MW. The purpose of designation of schemes over 50MW is that "*a large and rapid increase in electricity generation*" is "essential" for Scotland to meet its net zero emissions targets. This is the case for the proposed development.

- 5.8 Page 97 of NPF4 sets out that national developments are described as “*significant developments of national importance that will help to deliver the spatial strategy*”. It adds that “*their designation means that the principle for development does not need to be agreed in later consenting processes*”.
- 5.9 In addition to the status as national development, *Policy 1: Tackling the climate and nature crises* of NPF4, as arguably the primary policy within the document, significant weight should be given to the global climate and nature crises, in order to ensure that they are recognised as a priority in all plans and decisions.
- 5.10 The intent behind Policy 1 is to encourage, promote and facilitate development that addresses the global climate emergency and nature crisis.
- 5.11 The NPF4 is linked directly to the legislation and policy set out within section 3 of this Planning Statement, which provides further overarching and overwhelming support for renewable energy generation in the need to reduce carbon emissions.
- 5.12 The fact that the Scottish Government and the host Council have both declared climate emergencies again reinforces the need to act. The principle of development has clear and unambiguous support from the Development Plan. It is therefore not in question that Scotland needs wind farms. Matters around siting and acceptability of design and impact are dealt with later in this document.
- 5.13 In terms of wider legislation, material considerations all strongly point towards the need for the proposed development. At a UK policy level there is a consistent thread that more needs to be done. The CCC report to UK Government in 2024 assessed that to be on track for the UK Government's interim 2030 target of 68% of 1990 levels, that only a third of the emissions reductions required are currently covered by credible plans, all indicators for low carbon technology rollout are off track, with rates needing to significantly ramp up. This is echoed in the Clear Power 2030 document also which sets out the need to generate enough clean power to meet to UK's total annual electricity demand whilst increasing energy security.
- 5.14 The Scottish Government are also clear that the aspirational additional capacity required in Scotland is a minimum. The aforementioned targets in the 2022 OWPS of reaching 20GW installed capacity in 2030 may not be met. In any event, the requirement for clean electricity clearly does not stop at 2030.

The Acceptability of the Proposed Development

- 5.15 Having regard to the characteristics of the proposed development and the potential environmental effects identified and assessed within the EIA Report, it is appropriate to test the policies of the Development Plan and demonstrate compliance using the evidence gathered within the EIA Report. Topics include:
- Landscape & Visual;
 - Archaeology & Cultural Heritage;
 - Ecology & Ornithology;
 - Transport;

- Geology, Hydrology & Hydrogeology;
- Noise; and
- Socioeconomics and Tourism.

Landscape & Visual

- 5.16 Landscape and visual impacts are a key focus of any wind energy development, and throughout the design evolution and the assessment process any potential impacts have been fully considered. A Landscape and Visual Assessment (LVIA) has been undertaken as part of the application process and the findings in full are presented as Chapter 6 of the EIA Report.
- 5.17 The key policies within the Development Plan are NPF4 Policy 11 and LDP2 Policy 04, 05, 08, 10, 70, 71 and 72. These policies are summarised in the preceding sections. NPF Policy 11(e)(ii) states that significant landscape and visual impacts are to be recognised and expected for some forms of renewable energy. It states that “*where impacts are localised and/ or appropriate design mitigation has been applied, they will generally be considered to be acceptable*”.
- 5.18 There are considerations to address several matters in respect of landscape and visual policy compliance; namely siting, design, landscape effects, visual effects, and residential amenity.

Siting and Design

- 5.19 As described within EIA Report Chapter 4: Design Evolution and the Design and Access Statement, the site was selected for its high predicted wind yield, its relatively remote nature, and for its topography which would allow a degree of landscape fit with potentially larger turbines required for modern onshore wind developments (not appearing as prominent as they otherwise might. The existence of a wind farm cluster which would comprise Auchadaduie, Blary Hill, Beinn and Tuirc schemes and the proposed development (along with the under determination West Torrisdale), means that the received landscape is less sensitive to new wind farm development.
- 5.20 LDP2 Policy 10 states that the proposal must demonstrate an understanding of the proposed development site and wider context, including consideration of character. The landscape character type is host to several operational and consented wind farms along the Kintyre spine, with the site being proposed directly in the middle of this, almost equidistant from both western and eastern coastlines. The Zone of Theoretical Visibility (ZTV) model demonstrated within Figure 6.2b within Volume 2 of the EIA Report demonstrates that impact upon the coastal fringes and designations associated with them are very limited to a small area of western coastline adjacent with Glenbarr.
- 5.21 The site is appropriate for a wind energy development given the existing influence of turbines, the distance from settlements, and the interior plateau of Kintyre, and although not an extant part of the Development Plan, assessment against the ABLWECS further demonstrates this as detailed further below.

- 5.22 Simply put, the proposed development is sited in an ideal location within Kintyre given the limited effects on coastlines, designations, settlements and routes, within an existing cluster of wind energy development. In terms of its siting, the proposed development fully accords with Policy 10 of the LDP2.
- 5.23 Policy 08 of the LDP2 concentrates on design. In terms of design, both the Design and Access Statement and Chapter 4 of the EIA Report demonstrate how the Applicant has aimed to develop a design that allows for modern turbines of a scale which would produce a valuable contribution to energy targets, but which do not appear to dwarf or overwhelm the other, smaller turbines within the cluster given the use of topography and a sloping site within the design process.
- 5.24 This design principle is demonstrated within Figure 6.20 within Volume 3 of the EIA Report. Whilst this shows additional concentration of turbines from VP3 Glenbarr War Memorial with some stacking, it is hard to discern that the proposed development turbines are in cases approximately 100m taller than the Blary Hill turbines also shown, primarily given the difference in ground level of the two schemes. This is a deliberate design principle.
- 5.25 Similarly, from VP2 at Arnicle, again whilst there are more turbines with the proposed development, no turbine within the proposed development breaks the height against the skyline set by Blary Hill turbines to the right of the image. Given the increased setback from Arnicle (the proposed development is 1.8km whilst Blary Hill is approximately 800m) this allows for the increased scale of turbine to be accommodated.
- 5.26 Other good examples of where the topography has been used to fit the existing cluster include Figure 6.24 within Volume 3 which depicts VP6 at Lussa Loch. From this recreational viewpoint, the proposed development matches the turbines of Beinn an Tuirc, which are considerably smaller. Viewpoint 8 from Ranachan Hill (Figure 6.26) demonstrates the proposed development within the spine of Kintyre where it modestly adds to the cluster of development, unlike the sprawling application stage Cnoc Buidhe to the west.
- 5.27 Another key design feature was to eliminate visibility of turbine hubs, and therefore potential aviation lighting effects from coastal Arran, which forms part of the North Arran National Scenic Area (NSA). This can be demonstrated from VP9 at Imachar Point (Figure 6.27). This alleviates both daytime and nighttime effects upon coastal North Arran and the NSA by design.
- 5.28 Therefore, the proposed development clearly accords with Policy 08 of the LDP2. Per the policy terms, it integrates into the landscape, and careful attention has been given to how the scheme would interact with hilltops, ridgelines and skylines as explained above. The significant effects are outweighed by benefits greater than on a local scale, and design mitigation has been employed as per Policy 11e) of NPF4. The design has accommodated topography and the character of the area.

ABLWECS

- 5.29 The ABLWECS, whilst clearly not part of the Development Plan and not something to be used to assess overall acceptability or not, is useful to use as a guidance tool especially when assessing siting and design.

- 5.30 The constraints and opportunities of the Upland Forest Moor Mosaic LCT have been reviewed within Table 6.7 of the EIA Report, which is useful to replicate below.

Table 2 Consideration of the ABLWECS

ABLWECS	Design consideration of the proposed development
Upland Forest Moor Mosaic - Constraints	
<i>The more rugged landform of smaller interlocking hills and slopes which provide a backdrop to the settled coastal landscapes of the Rocky mosaic (20) and the Bay Farmland(14) on the outer fringes of the Kintyre peninsula and which are prominent in views from roads and settlement.</i>	The hills within the Site are not particularly high or 'rugged', appearing more as undulating occasionally craggy hills, set within the centre of an upland plateau away from the more rugged slopes at the edge of the plateau landscape. Views towards these hills from roads, settled coastal landscapes of the Rocky mosaic (20) and the Bay Farmland(14) on the outer fringes of the Kintyre peninsular would be very limited as illustrated in the ZTVs. Where visible, the proposed development would be seen in views beyond the outer fringe hills, and in the context of other existing and consented wind farms, some of which are closer and more prominent than the proposed development.
<i>The more pronounced, rugged and higher hill summits, including Beinn Bhearc, and Beinn an Tuirc, which are particularly visible from the sea and Arran to the east, adding interest to the fairly uniform skyline of these uplands. The hill of Cnoc a Bhaile-sois at the northern end of the peninsular is also prominent, particularly in views from the west in the Knapdale area.</i>	The proposed turbines would be located in an area already influenced by wind farm development approximately 1.4km southwest of Beinn Bhearc. The proposed turbines would be set at a lower elevation than Beinn Bhearc summit and would be partially screened by intervening landform in views from Arran as illustrated in Viewpoints 9 and 12.
<i>The narrow settled glens which extend into these uplands – for example Barr Glen and Glen Lussa – which would be sensitive to larger typologies sited on the edge hills and ridges which provide immediate skylines to these smaller scale landscapes.</i>	The proposed turbines would be visible from parts of Barr Glen and Glen Lussa but would be seen set back from the sides of Barr Glen beyond Blair Hill and behind existing wind turbines (Auchadaduie and Blary Hill wind farms) for much of the glen. Views from these areas are illustrated in Viewpoints 2 and 6.
<i>The edges of these uplands which form prominent skylines and containing ridges seem from the intimately scaled and richly diverse Hidden Valleys (3) and coasts around Carradale and Saddle on the east coast of Kintyre.</i>	The proposed turbines would be set back from the coastal edges and would not be visible from the settlements of Carradale and Saddle.

ABLWECS	Design consideration of the proposed development
<i>The APQ covering the coastal fringes which abuts this character type and where turbines could potentially impact on special qualities if visible on prominent skylines.</i>	The proposed turbines would not be visible on the skylines from the Kintyre coastal areas covered by local landscape designations as illustrated on the ZTVs.
<i>Views to the mountains of north Arran and Jura from the B8001.</i>	The proposed turbines would not affect views to the mountains of north Arran and Jura from the B8001 as illustrated on the ZTVs and illustrated viewpoints.
<i>Potential cumulative effects with operational and consented wind farms seen from the A83, B842, B8001, from the Kintyre coast. Kilbrannan Sound, Arran (including North Arran NSA and WLA) Gigha and the West Loch Tarbert area.</i>	There would be very limited visibility from the A83 and B842 and no visibility from the B8001 and West Loch Tarbert area. In general, the proposed development would be barely visible all along the Kintyre coast. The proposed turbines would be visible from parts of Arran and Gigha and seen in the context of other operational and consented wind farms. As assessed in Technical Appendix 6.2, there would be no significant cumulative effects as a result of the proposed development when viewed from Arran or Gigha (Viewpoints 9, 10, 11 and 12).
Upland Forest Moor Mosaic - Opportunities	
<i>The generally simple landform and expansive scale of the interior plateau areas.</i>	The proposed turbines would be set within the expansive interior plateau.
<i>The sparsely settled nature of this character type and the relatively limited visibility of the interior of these uplands from surrounding coastal fringes.</i>	The proposed turbines would be set in an upland area, away from settlement and the surrounding coastal fringes.
Upland Forest Moor Mosaic – Cumulative Issues	
<i>Larger turbines and/or more extensive wind farm development sited on the outer edges of the Kintyre uplands where they would be likely to significantly increase landscape and visual impacts on the settled coastal edge of Kintyre and on views from Arran and Gigha and would also further erode the established pattern of wind farm development largely</i>	The proposed turbines would not be located on the outer edges of the Kintyre uplands, rather they would be located in the less sensitive core of the uplands on the central spine of the Kintyre peninsula. As a result, cumulative visual effects as a result of the proposed development experienced from Arran and Gigha would be limited as illustrated in Viewpoints 9, 10, 11 and 12.

ABLWECS	Design consideration of the proposed development
<i>associated with the less sensitive core of these uplands.</i>	
<i>Potential effects on the A83 Tourist Route where any new wind farm development located in this character type could increase sequential cumulative effects with the developments of Allt Dearg/Srondoire, Freasdail, Auchadaduie, Blary Hill and Tangy.</i>	There would be very limited visibility of the proposed development along the A83 / Kintyre 66 Tourist Route. Where it would be most visible at Glenbarr, the turbines would be seen behind the existing Blary Hill and Auchadaduie turbines and would increase the density of turbines in the view at this location. Cumulative sequential effects would therefore be minimised.
<i>Potential effects on views from the B842 on the east coast of Kintyre where any additional development could be seen sequentially with the Cour and Beinn and Tuirc I, II and III wind farms.</i>	There would be very limited visibility along the B842 as indicated by the ZTV. Where visible the turbines would be partially screened by intervening landform due to their position towards the centre of the upland plateau, limited to a hub and mostly blades and blade tips. The turbines would be seen alongside Beinn and Tuirc I, II and III but not with Cour, however, would not contribute to any significant cumulative effects as illustrated in Viewpoints 5 and 7 located off the B842.
<i>Additional wind farms and extension/repowering of operational wind farms which may comprise much larger turbines and could increase inter-visibility and overlap between developments seen from Gigha and Arran and from the A83 and B842 on Kintyre.</i>	The proposed turbines would be intervisible with turbines at Beinn and Tuirc I, II and III and Blary Hill / Auchadaduie in views from parts of Gigha and Arran with very limited visibility from the A83 and no visibility from the B842. These existing and consented wind farms would reach the end of their operational / consented life during or before the lifetime of the proposed development (particularly the smallest turbines at Beinn an Tuirc I) and would either be decommissioned or repowered with larger turbines. There would be intervisibility with other surrounding wind farms where the proposed turbines would add to the concentration of turbines in this part of the landscape.
<i>Extensions or repowering proposals (involving significantly larger turbines) to operational and consented wind farms which could increase the extent of development seen on sensitive skylines above the Hidden Glens (3) or within the narrow, settled Barr Glen and Glen Lussa within this character type.</i>	The proposed turbines would add to the existing visible turbines along Barr Glen and Glen Lussa but would typically be seen behind existing turbines of a similar apparent scale in Barr Glen (Viewpoint 2) or would be partially screened by landform in Glen Lussa (Viewpoint 6). There would be no, or very little potential visibility from the Hidden Glens (3) character type as shown the ZTV analysis.
<i>Cumulative effects associated with and additional wind farm development located in this character type and in the</i>	Due to the location of the proposed turbines towards the centre of the Upland Forest Moor Mosaic character type (6), the proposed turbines would be screened by intervening landform at the eastern

ABLWECS	Design consideration of the proposed development
<i>nearby Mull of Kintyre Upland Forest Moor Mosaic character type (6c) in terms of views from the west coast of Arran which take in the full length of the peninsular.</i>	edge of the upland plateau resulting in very little visibility from the west coast of Arran as illustrated in Viewpoint 9.
<i>A potential 'corridor' of large wind farm development seen either side of the B8001 which could significantly detract from views to Arran and Jura and affect the experience of travellers using this road and the Lochranza-Claonaig ferry route.</i>	The proposed turbines would not be visible from the B8001 as shown the ZTV. There would be some visibility of the proposed turbines (blades / blade tips) from the Lochranza to Claonaig Ferry however these views would not be significant as illustrated by Viewpoint 18 at over 22km distance.
<i>Significant increases in the extent of wind farm development (as gaps between present clusters of turbines are potentially filled) seen in views from Arran which could present a dominant, continuous and dense band of turbines seen on the skyline – this could include a coalescing effect experienced when looking south down the Kilbrannan Sound from north Arran and from the Lochranza – Claonaig ferry.</i>	The proposed turbines would be located adjacent to existing turbines and would therefore add to the density of turbines in part of the landscape already influenced by wind farm development. In views from North Arran and from the Lochranza – Claonaig ferry there would be limited visibility of the proposed turbines from sea level (Viewpoint 18) and the coastline of North Arran (Viewpoint 9). In elevated views from North Arran, the proposed turbines would be visible in panoramic views and part of the view already influenced by wind farm development (Viewpoint 12) resulting in non-significant effects.
<i>Cumulative effects on the setting of the North Arran NSA and WLA related to the above scenario.</i>	See above.

- 5.31 It is apparent from the above that accounting for the increase in size since the ABLWECS was published, the proposed development fulfils many of the opportunities that have been sought by the Council.
- 5.32 The Council has been clear in its interpretation of the ABLWECS and the requirement for sites that occupy the spine of Kintyre (or do not occupy prominent coastal locations) via decisions on other windfarms. The Council's response and position related to the refused Earraghail Wind Farm sets out clearly in its Report of Handling dated February 2023 that significant impacts upon coastal settings are not to be favoured, and that the main spine offers less susceptibility.

- 5.33 It is apparent from the evidence above that the account of the host landscape provided within the ABLWECS, along with its opportunities and constraints, is open to a different interpretation that does involve capacity for appropriately sited and designed onshore wind such as the proposed development.

Landscape Effects

- 5.34 Chapter 6 of the EIA Report within paragraph 6.160 states that the LCT is already influenced by the presence of several wind farms, whilst paragraph 6.161 reiterates that the turbines are broadly contained between forested uplands and surrounding summits.
- 5.35 The effects of the proposed development are not unusual for a wind farm, and as stated within paragraph 6.164 of the LVIA, significant effects on the host landscape are unavoidable. The LCT is already host to adjacent wind farms in this vicinity.
- 5.36 Significant landscape effects within 2-3km upon the host LCT would constitute localised effects within NPF4, Policy 11(e)(ii) and would generally be expected and acceptable where design mitigation has been applied. Therefore, landscape effects are consistent with the Development Plan.

Visual Effects including Designations

- 5.37 The viewpoint analysis within the EIA Report indicates that significant visual effects are likely to affect limited locations within approximately 6.3km distance from the proposed development (subject to a clear view of the proposed turbines, landform and vegetation screening). The ZTVs within Volume 2 (e.g. Figure 6.2b) are useful in illustrating potential visibility and the location of these Viewpoints.
- 5.38 Descriptively, areas of potential visibility where significant effects may be found are limited to:
- Limited areas to the northern and eastern edges of Glenbarr;
 - Five other residential properties at distances of over 1.8km;
 - Approximately 1km of the A83/Kintyre 66 Tourist Route;
 - Approximately 3.2km of the Barr Glen road;
 - Glenbarr War Memorial (when facing east); and
 - Sections of the Kintyre Way.
- 5.39 Although there is no relevant national guidance on what constitutes a localised effect, the Reporter on the Kirkan Wind Farm approval (ref ECU00001880, within Supplementary PLI Report, paragraph 69) offered that localised effects have to be considered in the context of what would be expected for a commercial scale onshore wind farm, however would be in his opinion, “an effect that was rather less in its extent than might be expected for such a development”.
- 5.40 With turbines of up to 230m, and significant effects limited to 6km, this is exactly the spirit of what was meant within the Kirkan decision. It would be therefore logical and following Ministerial precedent that significant effects related to the proposed development could

also be deemed as localised. Therefore, the proposed development can draw clear support from NPF Policy 11 (e)(ii).

- 5.41 The Residential Visual Amenity Assessment within Technical Appendix 6.3 of the EIA Report assesses that of the five significantly affected properties, all within the Arnicle Farm cluster, two of these properties (Arnicle House and Glenview) are financially involved with the proposed development, and all but one property is owned by the parties who are financially involved. No residential properties would fail the 'Lavender Test' and make them unattractive places to live.
- 5.42 In terms of night-time and the impact of aviation warning lighting, the LVIA concludes that there would be no significant effects as a result of 4 of the 9 turbines being lit, due to the ability to dim the lights to 10% during times where visibility is greater than 5km, and given the in-built horizontal shielding that provides mitigation to those at angles below 0 degrees to the light. As demonstrated within the night-time assessment within Technical Appendix 6.4 of the EIA Report, there is already a degree of baseline lighting in the area, from settlements such as Carradale, Glenbarr, Campbeltown and Machrihanish, and from Campbeltown Airport. There are also existing and proposed aviation lights from wind farms in the vicinity, including lights at Blary Hill, Beinn and Tuirc, Tangy II and the consenting Tangy IV and Clachaig Glen Wind Farms. The additional four lights at the proposed development are not considered to comprise a significant additional effect as discussed at length within Technical Appendix 6.4 of the EIA Report.
- 5.43 It is the established view from both the Scottish Ministers and the Applicant, that radar detection systems which switch aviation lights on and off based on flight activity are currently not mandated by aviation regulators and it may be some time before these are available. Appropriate conditions can be applied to any consent that would allow constant review of this position at appropriate time intervals.
- 5.44 With regards to designations, the proposed development is deemed to have no significant effects on any landscape designation during both day and night. This includes Local Landscape Areas, National Scenic Areas and Wild Land areas. Policy 70 and Policy 71 of the LDP2 set out criteria to guide development in relation to these designations.
- 5.45 With regards to NSAs, Policy 70 states that the Council would resist any development in or affecting NSAs that would compromise the objectives of their designation and the overall integrity, or that it would fail to safeguard Special Qualities unless it is adequately demonstrated that the effects are clearly outweighed by social, environmental or economic benefits of national importance.
- 5.46 A full assessment against the Special Qualities of the NSA is carried out from paragraphs 6.185 to 6.229 of Chapter 6 of the EIA Report following NatureScot guidance. In summary, the proposed development is 11.3km from the NSA, and would not be seen from large parts of it. Along with the robust assessment cross-referenced above within the LVIA Chapter, Viewpoint 9 and 12 (Figures 6.27 and 6.30) are useful to understand the extent of effects.
- 5.47 From coastal Arran, design has aimed to severely restrict daytime effects such that tips are barely visible above the horizon (as seen from Imachar Point, Viewpoint 9, Figure 6.27 within

Volume 3 of the EIA Report). From upland Arran within the NSA, during daytime the scheme is visible from the Pirnmill hills, however, is less visible and prominent than the consented Clachaig Glen scheme to the north, and where part of the Allt Domhain is screened by topography.

- 5.48 Only one Special Quality of the NSA was taken forward to full assessment within the EIA – SLQ 7 – *an exceptional area for outdoor recreation*. From the western coastal areas, the proposed turbines would be mostly screened by intervening landform such that they would be partially visible as three blade tips and occasionally one hub alongside existing turbines as illustrated in Viewpoint 9, Figure 6.27 and Viewpoint A, Figure 6.5.A in Technical Appendix 6.5. There are several recreational opportunities along the coastline including the Arran Coastal Way and various beaches with informal parking. The main orientation of views is to the west across Kilbrannan Sound towards the expanse of the Kintyre peninsula. The proposed turbines would occupy a very narrow horizontal and vertical field of view of this expansive panorama and the sense of change to the SLQ would be very limited.
- 5.49 In relation to night-time effects on this SLQ, visibility of the aviation warning lights from the NSA is limited to the upper, elevated slopes and summit the northwestern part of the NSA at around 15-20km, and further inland from the eastern peaks around Goatfell beyond 22km distance. Viewed from these areas, up to four aviation warning lights from the proposed development would appear as points of light beyond the NSA and Kilbrannan Sound on the upland skyline of the Kintyre peninsula, adjacent to and in the context of other light sources as noted above. The in-built lighting mitigation includes horizontal shielding and the ability to operate at 10% capacity for the majority of the time, as highlighted within Chapter 6 and within Technical Appendix 14.1 of the EIA Report.
- 5.50 The proposed development would slightly increase the presence of artificial lighting in outward views from the NSA (but to the fore and adjacent to other light sources), and aviation lighting would increase the duration over which potential effects on the SLQ are experienced. Given intervening distance and other light sources, there are no significant effects found.
- 5.51 Accordingly, with no significant effects upon designations, landscape effects limited to between 2-3km and visual effects limited to 6km, the proposed development clearly meets the tests set out within Policy 11 and Policy 14 of NPF4, and Policy 04, 05, 08, 10 70 and 71 of the LDP2.

Archaeology & Cultural Heritage

- 5.52 Policy 19 of the LDP2 and NPF4 Policy 7 provide the key policy tests for impacts upon cultural heritage assets related to the site, which primarily centre around impacts upon the closest assets which are Garvalt dun 500m SW of (SM3740), Blary dun, ENE of (SM3077) and Crois Mhic Aoidh standing stone (SM251).
- 5.53 Taking effects on each in turn, Garvalt dun is located approximately 1.5km north-west of turbine 1. As per the analysis within paragraph 10.47 to 10.50 of Chapter 10 of the EIA Report, the monument's setting is primarily characterised by its relationship to Barr Glen, with views north-east and south-west along the Barr Water. The assessment within the EIA

Report suggests that this setting is partly compromised by forestry operations which screens views in these directions.

- 5.54 The addition of the turbines would not fundamentally alter the monument's relationship to the valley floor or disrupt the integrity of the monument's setting, although the proposed development would introduce a new feature (as per Figure 10.5 within Volume 3 of the EIA Report). The addition of the access track in views to the south and south-west would influence new peripheral features in these directions but the integrity of the monument's setting would not be altered. Overall given the reasons for designation, primarily concerned with views away from the proposed development, the EIA finds effects to be not significant.
- 5.55 Blary dun is located approximately 2.3km north-west of turbine 5 and comprises an oval-shaped dun overlooking Barr Water, granting commanding views to the north-east and south-west, giving it an implicit association with the glen. As this monument's key setting relationship is to the valley floor of Barr Glen and Barr Water and associated directed views to the west, south west and north east, the addition of turbines in views to the east is not anticipated to impact the integrity of the monument's setting. The addition of new access tracks to the north would add visibly modern supporting infrastructure to views to the north and north-east, adding to existing road and farm track infrastructure. This would not fundamentally alter the existing modern rural character of the landscape surrounding the asset, and the integrity of setting would be preserved, resulting in a not significant effect.
- 5.56 Crois Mhic Aiodh is a standing stone situated approximately 1.1km south-east of turbine 8 in the vicinity of Beinn an Tuirc and Blary Hill. The proposed development would add visibility of five additional turbines to the existing view, including two hubs (as per Figure 10.9 within Volume 3), and would not be situated visibly closer to the monument than Beinn an Tuirc. This is not considered to comprise a significant effect.
- 5.57 Overall, whilst the proposed development has theoretical visibility to and from these Scheduled Monuments, it is considered that none of them would experience effects on setting and integrity such that there would constitute a significant effect. Therefore, the proposed development is in accordance with Policy 7 of NPF4 given sub-policy of (h)(ii) is not breached.
- 5.58 In terms of accordance with Policy 19 of the LDP2, the policy is written in such a way that requires singularly adverse effects to not be permitted, whilst the presumption is against developments that do not retain, protect, conserve or enhance. The wording does not prescribe any advice on effects that may be minor or negligible adverse in EIA terms, but not significant. In any respect, the setting and design of the wind farm is such that the main reason for designation of Garvalt and Blary duns above has been respected.
- 5.59 Therefore, there is no conflict between the provisions of the Development Plan and the findings of the EIA Report.

Ecology & Ornithology

- 5.60 In relation to the natural environment and biodiversity, Chapters 7 and 8 of the EIA Report provide an assessment of the potential effects of the proposed development on

ornithological and ecological interests. Policy 3: Biodiversity and Policy 4: Natural Places of the NPF4 along with Policy 73 and 74 comprise up to date and relevant Development Plan policies.

- 5.61 Chapter 7: Ecology reports that with embedded mitigation, or with the peatland mitigation and enhancement measures contained within Technical Appendix 7.6, there would be no significant effects upon any ecological designation, any habitat or species. A Construction Environmental Management Plan including individual Species Protection Plans will be prepared as required, along with monitoring by a qualifying Environmental/Ecological Clerk of Works.
- 5.62 Accordingly, there is no conflict with the policies of the Development Plan in this regard and the contribution of peatland restoration within the Outline HMP provides a key requirement of Policy 3 and Policy 4 in contributing to enhancement of biodiversity, restoring degraded peat habits and noting the need for restoration. Given the extent of the HMP area is within the control of the Applicant on land solely owned by the McArthur family, the intervention is deliverable and secured as per the requirements of NPF4 Policy 3.
- 5.63 The ratio of peatland restoration to meet NatureScot guidance is at a ratio of 1:10 for restoration plus 10% of baseline. With an impacted area of 31ha, to mitigate this, 310ha of peatland will be restored, along with an additional 3ha of enhancement. This meets the requirement of NPF4 Policy 3b.
- 5.64 Chapter 8 contains ornithological assessment, including full commentary of survey seasons and validity. The Applicant has presented a robust baseline spanning over 3 years of data, supplemented by external data from adjacent developments, which will continue to be supplemented with the culmination of the 2025 season via a Further Environmental Information (FEI) submission in Autumn / Winter 2025. Following this FEI, the Applicant believes this is more than sufficient upon which to base a determination.
- 5.65 All impacts upon bird species, individually and cumulatively, including collision risk and displacement effects, were found to be not significant, with scenarios being provided for the standard, but extremely unrealistic NatureScot guidance assumption of 85% operational time. The assessment has also provided a more realistic assumption for operational time of 44.8%, which represents a modern turbine capacity factor.
- 5.66 A Bird Protection Plan would be agreed via condition and would control timing of works and mitigation for species such as black grouse. Confidential information surrounding the prevalence and location of known nesting and lekking sites has been provided to the appropriate consultees, along with information about how the Applicant intends to mitigate any potential impact.
- 5.67 There were no significant effects found on the Kintyre Goose Roosts SPA, and despite Loch Arnicle not forming part of the designation, consideration was given to the connections to the other parts of the SPA for Greenland white fronted geese. The Scottish Government, as Competent Authority, will be required to carry out an Appropriate Assessment under the Habitats Regulations.

- 5.68 Accordingly, there are no conflicts with the Development Plan on ornithological grounds and it is very unlikely that the remaining few months of survey that will be reported on in Autumn/Winter 2025 would change this outcome however it is acknowledged that consultees cannot form a full view until this is available.

Transport and Access

- 5.69 Chapter 12 of the EIA Report deals with effects relating to Transport and Access. Policy 39 and 41 of the LDP2 are relevant for consideration.
- 5.70 As explained within Chapter 3 and Chapter 4 of the EIA Report, along with the Design and Access Statement and within section 2 of this Planning Statement, two access options are noted and assessed throughout each EIA chapter where applicable. Accordingly the transport assessment looks at effects for both routes and concludes that construction and operational traffic for either option would be well below the cited capacity for each road used.
- 5.71 Consent is sought for a new junction with the A83 and a Departure from Standard application will be submitted to Transport Scotland as part of this, to justify that the visibility splays are appropriate. Documentation to support this is detailed within Technical Appendix 12.4, whilst an outline junction design is available within Technical Appendix 12.2.
- 5.72 For either option there would be a temporary increase in traffic volumes on the study road network during the construction phase. Traffic volumes would decrease considerably outside the peak period of construction.
- 5.73 Should either route be taken, the principles of a robust Traffic Management Plan is contained within Chapter 12 of the EIA Report and would be adhered to via condition, thus managing disruption as required.
- 5.74 The movement of abnormal loads traffic would require small scale and temporary remedial works at a number of locations along identified delivery route. An Abnormal Indivisible Loads route assessment is provided within Technical Appendix 12.1 of the EIA Report.
- 5.75 Accordingly, connectivity would be maintained, it is demonstrated that there is capacity on the road and there would be no significant effects. The proposed development does not conflict with the Development Plan in this regard.

Geology, Hydrology & Hydrogeology

- 5.76 The primary Development Plan policies to demonstrate accordance with are NPF4 Policy 5 and Policy 11, along with LDP Policy 55, 59 and 79.
- 5.77 Design mitigation of the proposed development has minimised potential for adverse effects upon watercourses via implementing a 50m design buffer.
- 5.78 Chapter 9 of the EIA Report assesses that with appropriate controls via implementation of a Construction Environmental Management Plan (CEMP), there would be no adverse impacts upon hydrology as a result of the proposed development. Watercourse crossings

will be designed in detail to a specification that meets with the requirements of regulators and of haulage and load requirements as per the outline watercourse crossing schedule within Technical Appendix 9.1.

- 5.79 A detailed flood risk assessment would be required for the potential bridge crossing of the Barr Water (as per Figure 3.12 of Volume 2), should that access route be adopted. Given the outline provisions of a bridge crossing at this stage, with detail to be confirmed via condition, it is appropriate to condition a full flood risk assessment.
- 5.80 With regards to the proposed bridge crossing, should the northern bypass route be used, Policy 55 of the LDP2 prohibits development on the functional floodplain. Chapter 9 explains that the proposed outline bridge design would be of modular, single span design and would minimise impacts upon the water environment.
- 5.81 Potential impacts upon peat have been assessed via baseline collection of data through Phase 1 and Phase 2 surveys along with supplementary ecological information to classify areas of potential groundwater dependence and the quality of peat within the site.
- 5.82 The draft Peat Management Plan within Technical Appendix 9.2 demonstrates that peat can be retained onsite and no peat will be removed from the site. Technical Appendix 9.3 concludes that all proposed infrastructure elements present a low risk of peat slide.
- 5.83 Despite the status of the site as comprising Class 1 peat deposits as per NatureScot's Carbon and Peatland map (2016), survey found that the site is largely degraded as a result of drainage and grazing, and does not exhibit the characteristics one may expect from a Class 1 peatland.
- 5.84 NPF4 Policy 5 states that development proposals on peatland will only be supported for ii) the generation of energy from renewable sources that optimises the contribution of the area to greenhouse gas emission reductions targets and v) restoration of peatlands. There is therefore support under NPF4 Policy 5 given two applicable criteria would be fulfilled. Similarly, Policy 79 of the LDP2 aims to protect peatland where significant effects are only acceptable where clearly outweighed by social, environmental or economic benefits of community wide importance. This policy strand is not applicable given with significant restoration, there is no significant effect and any adverse impact is therefore outweighed.
- 5.85 Following the SEPA GateCheck Report response, within Technical Appendix 1.3 of the EIA Report, it should be noted that siting of turbines 2 and 6 encroach slightly into areas of deeper peat. There were clear siting and spacing restrictions on both turbines. For turbine 2, a move southward would encroach into watercourses buffers, a move north or east would move closer to Beinn an Tuirc and the HMP area earmarked for that and also into deeper peat, and the composition of the scheme from a landscape and visual point of view does not benefit from a westward move, whilst being comparable in peat terms. In terms of Turbine 6, there requires to be a degree of separation from Blary Hill turbines to ensure operational efficiency. The compound associated with Turbine 6 could theoretically move north-south but this would result in more cut and fill and a greater amount of track to meet Turbine 8.

- 5.86 Whilst the usual mantra is 'the most amount of renewable energy with the least amount of infrastructure possible' in this rare case it is appropriate to look at alternatives. As described above within the transport and access section and as highlighted in the Design and Access Statement and PAC Report, the key concern for local people is the use of the Barr Glen road. A new road is supported locally, and its environmental effects are acceptable and not significant.
- 5.87 Accordingly, with appropriate and standard construction controls there are not anticipated to be significant effects upon hydrology, geology or peat, and the planning balance is such that with appropriate conditions on bridge works and access choices, along with the considerable restoration proposals, the proposed development is acceptable.

Socio-economics

- 5.88 NPF Policy 11c states that development proposals will only be supported where the maximise net economic impact, including socio-economic benefits including supply chain opportunities.
- 5.89 In construction terms, Chapter 13 of the EIA Report states that there would around 56 direct full time equivalent (FTE) jobs. The Applicant is committed to sourcing as much labour as possible and holds a local contractor list of companies who may be suited to tender for construction work. During operation, as is the case with large scale infrastructure projects, the number of jobs supported would reduce.
- 5.90 Approximately £7.8m of the capex costs for the proposed development are anticipated to be spent in Argyll and Bute.
- 5.91 In socio-economic terms, the proposed development would at worst, not disadvantage local socio-economic indicators and in a wider sense, the socio-economic benefit of the proposed community benefit fund. Whilst the community benefit fund itself is not a material consideration, the wider socio-economic benefit can be.
- 5.92 The Applicant will provide a community benefit package in line with prevailing Scottish Government guidance. Any monies would form a community benefit fund that would be made available to local communities and projects. There are already a number of well-established Development Trusts in the area and it is anticipated that the community benefit fund could be distributed to those trusts, as agreed by them, so that they could administer it in line with their identified priorities and areas of need. There are a number of Area Community Plans that set out goals for the local communities and, subject to decision making by the Development Trusts, these could be realised utilising the community benefit fund.
- 5.93 The Applicant has discussed possible uses of this funding and various suggestions. The Applicant is supportive of all of these potential uses of funding but recognises that it will be for local communities, through the established Development Trusts, to decide on how to achieve the greatest benefits.
- 5.94 In addition, there are other measures the Applicant has taken to maximise net economic impact, or indirect benefits which might be realised. At the time of writing, the proposed

development is one of three active wind farm proposals in Argyll and Bute promoted by the Applicant (or parent company Energiekontor UK Ltd, or subsidiary companies thereof), including the consented Rowan Wind Farm, Breackerie Wind Farm which awaits a decision from Scottish Ministers, and the proposed development. This allows for the maximisation and potential pairing of community benefit, including greater ability to seek matched funding, and all together a higher magnitude of positive benefit from the combined schemes. The Applicant has also led a provisional Kintyre-wide shared access arrangement with other developers, which will maximise the efficiency of investment and minimise disruption.

- 5.95 Accordingly, the Applicant is committed to maximising the net economic gain for Argyll and Bute, and accordingly there is reason to conclude that the proposed development is in accordance with the Development Plan.

Other Issues

- 5.96 Chapter 14 of the EIAR outlines the assessment of the proposed development against a variety of 'other issues', including infrastructure, aviation and radar, health and safety, telecommunications and television, and shadow flicker.
- 5.97 Aviation and radar interests were identified and there is anticipated to be no aviation led issues. HIAL have requested Instrument Flight Procedure reports for both Campbeltown and Islay airports, which were commissioned in early 2025. Owing to significant aviation industry delay, these are anticipated to be delivered in December 2025, before any determination of the project would be anticipated. These delays are related to considerable pressure on the aviation industry and a lack of certified professionals who can undertake IFP reporting.
- 5.98 An aviation lighting scheme was agreed with the CAA and HIAL and assessed within the EIA Report. No significant effects were found as a result of aviation lighting as explained within the landscape and visual assessment.
- 5.99 In terms of shadow flicker, there are no effects predicted given the distance between the proposed development and the nearest property. The Applicant is willing to agree a shadow flicker protocol as a condition to give comfort that should any matters arise, they would be mitigated.
- 5.100 In terms of ice throw, modern wind turbines are designed and manufactured to withstand the most extreme weather conditions which arise in the UK in terms of wind speeds, turbulence and temperature. Properly designed and maintained wind turbines are a safe technology and the likelihood of the occurrence of ice throw, given the history of the industry, is very low.
- 5.101 The results of the Carbon Calculator for the proposed development show that it is estimated to produce annual carbon savings in the region of 136,726 tonnes of CO₂e per year, and lifetime savings of over 4.7 Mt of CO₂e. These savings come about through the displacement of grid electricity, based on the current average grid mix.

- 5.102 The estimated payback time (against grid mix) of the proposed development, using the Scottish Government's Carbon Calculator, is estimated at 1.3 years, with a minimum/maximum range of 0.4 to 1.6 years.

Commentary on post-NPF4 Consenting

- 5.103 It is useful to comment on the current status of the consenting regime after the publication and adoption of NPF4. Between its adoption in February 2023 and the time of writing this document in June and July 2025, a total of 35 Section 36 wind farms have been determined, with 28 approved and seven refused.
- 5.104 It is clear from the comments of Reporters that the NPF4 has tipped the balance in favour of onshore wind. As the Reporter for the Sanquhar 2 case (ECU00001801, para 4.5 of Supplementary PLI Report) stated, *"a tangible shift in planning policy has been made at the national level" where "it is likely this shift may be sufficient to result in some wind farm proposals which would have previously been refused to now potentially be granted"*.
- 5.105 Similarly, the Kirkan decision (ECU00001800, Supplementary PLI Report, para 95) sees the Reporter find that the new NPF4 policies *"do ratchet the need case upward, at least relative to the acceptability of the proposed development's landscape and visual effects and the related appropriateness of its design"*.
- 5.106 With a consent rate of 80% post-NPF4, it is again clear that decision makers note, and continue to note, the clear targeted effort that is required to meet statutory targets as described earlier within this document.

Other Matters

- 5.107 It is worth noting the stance taken by the Applicant in relation to adjacent land uses and development aspirations as set out within the ECU Gatecheck Report (within Technical Appendix 1.3 of the EIA Report).
- 5.108 In relation to the interaction between the proposed development and the Beinn an Tuirc Habitat Management Plan Area, particularly the area cited within Scottish Power Renewables' Lifetime Extension application which overruns into the proposed development, consultees should refer to the legal advice from Harper Macleod forwarded to the ECU, Argyll and Bute Council and NatureScot on 17th June 2025. This provides the full context of the Section 75 agreement for the original Beinn an Tuirc scheme and the interactions with the Allt Domhain site.
- 5.109 There is also a useful explanation of the ecological interactions and compatibility between the Beinn an Tuirc HMP matters and the proposed HMP under the Allt Domhain application within Technical Appendix 7.6.
- 5.110 Regarding the Scoping application (ECU reference ECU00006122) by SSEN to connect the consented Tangy IV and the application stage Cnoc Buidhe schemes to Carradale, which comes across the Allt Domhain site, the Applicant has been in dialogue with SSEN and we understand that work is underway to look at alternative options given SSEN hold no land rights to traverse the Allt Domhain site. There may also be a requirement to revisit the SSEN

grid connection proposal based on the outcome of the Cnoc Buidhe Wind Farm project, and any theoretical changes to the Tangy IV scheme.

- 5.111 It is the view of the Applicant that neither of these matters should prejudice the determination of the proposed development.

6 CONCLUSION

- 6.1 This document provides a clear policy and legislative support for renewables and specifically onshore wind energy as a principle, in order to reach our Net Zero obligations by 2045 as set out in law.
- 6.2 The Scottish Government and Argyll and Bute Council are both supportive of the principle of onshore wind, and have both declared their respective climate emergencies. The principle is not in doubt and the pace of change and deployment needs to be urgent to meet the challenging 2030 interim targets.
- 6.3 The Planning Statement assesses the relative merits of the proposed development in relation to the policies of the NPF4 and LDP2 as organised by the evidence and assessment collected within the EIA Report. It notes that the Applicant has specified two possible routes to the wind farm area and requests a condition to limit the final choice to one. Despite there being a requirement for new road and a bridge crossing, this must be weighed against other considerations such as localised disruption and public support. In any event, there are no valid reasons, subject to conditions, to refuse one or both access options.
- 6.4 The proposed development draws immediate support from its status as a national development. This means that the principle and concept of renewable energy should not be in question by decision makers. It is therefore a question of siting and design, and associated subject-specific policy, upon which the acceptability of this proposed development must be based.
- 6.5 The proposed development can draw support from the Development Plan in terms of the siting and design of the wind farm. With the use of the mitigation measures which have been carefully inbuilt to the development and the additional mitigation measures that have been supplied within Chapter 15 of the EIA Report (and would be subject to planning condition), there are no significant effects to be found except those associated with localised landscape and visual effects.
- 6.6 Significant adverse landscape effects are contained to within 2-3km of the site whilst localised effects are constrained to approximately 6km. Whilst each site is assessed on its own merits, this is considerably within with what other Reporters have deemed 'localised', and which are generally deemed to be acceptable in accordance with NPF4.
- 6.7 The design in this area is key, which has aimed to use existing topography and provide even spacing as possible across the landscape, using the topography for screening where applicable. This is apparent through the Design Evolution detailed within Chapter 4 of the EIA Report, as well as the Design and Access Statement and visualisations within Volume 3.
- 6.8 The role of the ABLWECS, whilst a useful document, has diminished somewhat over recent years, with consultation responses, Public Inquiries and decision demonstrating that is a guidance document written prior to 2017, and that the industry and consenting

considerations have moved on. It does not form part of the Development Plan. However, support can be drawn from its contents as the design meets the opportunities highlighted within it.

- 6.9 Whilst there are Scheduled Monuments in the vicinity of the proposed development, it is judged that the significance of their setting and appreciation would not be adversely affected due to the orientation of views and how they contribute to that setting. There are found to be no departures from Development Plan policy in this regard.
- 6.10 In respect of NPF4, recent decisions in 2023 since its adoption clearly and unequivocally change the goalposts for the consenting of wind farms, with an overwhelming policy position in favour of onshore wind. At the time of writing, 28 of 35 Section 36 wind farms have been approved since NPF4, with Reporters noting that matters have shifted considerably in policy terms.
- 6.11 There are no other significant adverse effects found within the EIA Report subject to appropriate mitigation, nor are there any other material considerations which would outweigh the considerable benefits of the proposed development.
- 6.12 The proposed development also brings significant restoration of a large degraded area of peatland, which will provide benefits to habitats and ornithological species, as well as dovetailing with the adjacent Beinn and Tuirc HMP area. The restoration proposals are in line with NatureScot's 1:10 + 10% of baseline prescription.
- 6.13 In light of other material considerations including the need for Net Zero in law, it is the view of the Applicant that the case for the proposed development is therefore very strong.
- 6.14 The Applicant is committed to providing community benefit in line with the prevailing Scottish Government. Although this is not a material planning consideration per se, the resultant potential socio-economic benefit is a material consideration in itself.
- 6.15 In conclusion it is respectfully suggested that the Scottish Ministers, Argyll and Bute Council and other relevant consultees, stakeholders, and members of the public should support this application for the reasons stated within this document and based on the evidence collected within the EIA Report.