



Earraghail Renewable Energy Development

Pre-Application Consultation (PAC) Report

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Pre-Application Consultation (PAC) Report

1 Introduction

1.1 Overview

1. This Report constitutes a Pre-application Consultation (PAC) Report which describes the consultation requirements for the Earraghail Renewable Energy Development (the proposed Development), the consultation measures undertaken by the Applicant, ScottishPower Renewables (UK) Ltd (SPR), the feedback received and any resultant modifications to the proposed Development.
2. SPR recognises that it is very important to ensure that communities in the vicinity of any development are afforded appropriate and meaningful opportunities to comment on the proposals before they are finalised in accordance with regulations and good practice guidance.

1.2 The Proposed Development

3. The proposed Development would be located within the Argyll and Bute council and administrative area, between the Village of Tarbert, to the north east, and the village of Skipness, to the south – centred on National Grid Reference (NGR) NR 88732 63637. The exact location of the proposed Site is shown on **Figure 1.1** of the Environmental Impact Assessment (EIA) Report.
4. The Site lies wholly within the administrative boundary of Argyll & Bute (A&BC). Access to the Site will be provided from the A83 trunk road (**Figure 1.2** of the EIA report).
5. The proposed Development would comprise the optimum renewable technologies at the time and comprises 13 three-bladed horizontal axis wind turbines up to 180 m tip height, with a rated output of around 78 megawatts (MW) and ground mounted solar arrays of around 5 MW, producing a combined output of around 83 MW or 230 to 280 GWh of electricity annually. A battery energy storage system (BESS) of around 25 MW would also be installed to store generated renewable energy and provide flexible management of energy delivery and ancillary support services to the national grid. The final proposed site layout is shown on **Figure 3.1** of the EIA report.

1.3 The Applicant

6. Earraghail Renewable Energy Development is being proposed by SPR.
7. SPR is part of the ScottishPower group of companies operating in the UK under the Iberdrola Group, one of the world's largest integrated utility companies and a world leader in wind energy. ScottishPower now only produces 100% green electricity – focusing on wind energy, smart grids and driving the change to a cleaner, electric future. The company has committed to investing over £4 million every working day between 2018 to 2022 to make this happen and is committed to speeding up the transition to cleaner electric transport, improving air quality and over time, driving down bills to deliver a better future, quicker for everyone.
8. SPR is at the forefront of the development of the renewables industry through pioneering ideas, forward thinking and outstanding innovation. Its ambitious growth plans include expansion of its existing onshore wind portfolio, investment in new large-scale solar deployment and innovative grid storage systems including batteries. The company is also delivering the Iberdrola Group's offshore windfarms in the Southern North Sea off East Anglia.
9. With over 40 operational windfarms, ScottishPower Renewables manages all its sites through its world leading Control Centre at Whitelee Windfarm, near Glasgow.

10. SPR is committed to developing renewable energy responsibly and strive to be good neighbours in all aspects of their work. SPR are committed to Argyll and Bute and to maximising the opportunities for local communities to benefit from their projects.
11. To date, SPR has voluntarily paid more than £2 million in community benefit funding arising directly from renewable energy projects to communities in Argyll and Bute, supporting initiatives such as community facilities, environmental projects, heritage projects, health and wellbeing equipment and skills and employment support. It is expected that any proposed income streams would provide a long-term, flexible revenue which could be used to support community projects within the Kintyre area.

1.4 Consultation Guidance and Legislation

12. The Town and Country Planning (Hierarchy of Developments) (Scotland) Regulations 2009 apply applications for planning permission across Scotland and set out various criteria that are to be used to differentiate planning applications by development types and to define developments as either National, Major or Local developments. That differentiation is used to ensure that applications are dealt with in an appropriate way to their scale and complexity, allowing decisions to be taken at the most appropriate level.
13. Proposals for renewable energy developments such as the proposed Development, with a potential electrical capacity greater than 50 MW, are subject to the consenting procedures set out in Section 36 of the Electricity Act 1989 (the Electricity Act) and applications are made directly to the Scottish Ministers.
14. There is no statutory obligation to consult the public under the terms of the Electricity Act application process. Nevertheless, SPR has applied the principles of the consultation process recommended for 'major' planning applications as set out in The Town and Country Planning (Development Management Procedure) (Scotland) Regulations 2013 and circular 3:2013-Development Management Procedures. This enables the local community and all those with an interest in the proposals a clear opportunity to provide comment and feedback on the proposals.
15. SPR has also taken into consideration the report, dated August 2020, from the Scottish Government, entitled 'Consultation on Proposed Changes to Pre-Application Consultation Requirements in Planning'. The purpose of the report was to outline proposed changes to the pre-application requirements set out in the Town and Country Planning (Development Management Procedure) (Scotland) Regulations 2013. The proposed changes were part of a wider effort to improving community engagement in planning matters and building public trust. The proposed changes, which again would only apply to national and major developments as classified under the Town and Country Planning (Hierarchy of Developments) (Scotland) Regulations 2009 and not Section 36 applications, include the requirement for an additional public event (i.e. a required minimum of two public events) to allow for greater discussion of proposals and requirements on the content of PAC Reports to improve their consistency and transparency. In line with the proposed changes to the Town and Country Planning (Development Management Procedure) (Scotland) Regulations 2013, SPR hosted one online Public Information Event (PIE) between November 2020 and January 2021, to give an update on the project and provide greater feedback to the local community on their views. SPR also intended to host an online PIE between June and July 2020, however, in response to feedback received from the local community the event was cancelled. Feedback, however, was received from the community which was incorporated into the EIA.
16. Due to restrictions on travel and face-to-face meetings imposed by the Scottish Government in response to the Covid-19 pandemic and following the best available guidance, the PIE was hosted online. The event was designed in cognisance of the Scottish Government's 'Coronavirus (Covid-19): planning guidance on pre-application consultations for public events' (2020).
17. Finally, attention was given to community engagement, in cognisance of Planning Advice Note (PAN) 3/2010: Community Engagement (Scottish Government 2010).

1.5 Report Structure

18. Following this introductory Section, the remainder of this Report comprises the following Sections:
 - Section 2: Consultation Measures
 - Describes the different types of consultation undertaken for the proposed Development.

- Section 3: Public Information Events
 - Describes the online consultation process undertaken for the Public Information Event from November 2020 to January 2021 and, and provides results of the feedback received. The online PIE SPR was intending to host between June and July 2020, is not discussed in detail as it was never held, even though meaningful information was still received from the local community during that period.
- Section 4: Conclusions
 - Describes how the consultation process has influenced the design of the proposed Development.
- Section 5: Appendices
 - Contains copies of the press adverts, posters, leaflets and other information used for public consultation.

19. The content of PAC Reports is covered by circular 3:2013-Development Management Procedures. Section 35C of the Town and Country Planning (Scotland) 1997 Act, requires that the PAC Report should set out what has been done to comply with Section 35B of the 1997 Act. Furthermore, the PAC Report is to be in such form and include such content as may be prescribed. Circular 3:2013 advises that the contents should:

- *“specify who has been consulted;*
- *set out what steps were taken to comply with the statutory requirements and those of the planning authority;*
- *set out how the applicant has responded to the comments made, including whether and the extent to which the proposals have changed as a result of PAC;*
- *provide appropriate evidence that the various prescribed steps have been undertaken – for example, copies of advertisements of the public events and reference to material made available at such events; and*
- *demonstrate that steps were taken to explain the nature of PAC, in particular that it does not replace the application process whereby representations can be made to the planning authority.”*

20. As mentioned in **Section 1.4**, SPR considered the proposed changes to pre-application consultation put forward in ‘Consultation on Proposed Changes to Pre-Application Consultation Requirements in Planning’ (Scottish Government, 2020). One of the proposed changes (which are now set out in The Town and Country Planning (Pre-Application Consultation) (Scotland) Amendment Regulations 2021) was to prescribe the content of PAC reports. The amended legislation now sets that out as follows:

- “(a) the dates on which, and places where, public events were held as required in accordance with regulation 7(2),*
- (b) a description of-*
 - (i) any additional consultation or notification required by the planning authority in relation to the proposed application under section 35B(7) of the Act,*
 - (ii) any additional steps taken by the prospective applicant to consult with members of the public as regards the proposed development,*
- (c) a list of bodies, groups and organisations who were consulted by the prospective applicant,*
- (d) evidence as to how the prospective applicant carried out the activities described under sub-paragraphs (a), (b) and (c),*
- (e) copies of—*
 - (i) any materials sent to consultees,*
 - (ii) any materials provided to those attending a public event, and*
 - (iii) any visual presentation shown or displayed at a public event,*
- (f) photographs of any display boards or models at public events,*
- (g) confirmation as to whether consultees and attendees at public events were informed that pre-application consultation does not remove the right or the potential need to comment on the final application once it is made to the planning authority,*
- (i) a summary of—*
 - (i) the written responses to consultations, and*
 - (ii) views raised at public events,**including an indication of the number of written responses received and the number of persons who attended the public events,*
- (j) an explanation of how the prospective applicant took account of views raised during the pre-application consultation process, and*
- (k) an explanation of how members of the public were given feedback on the prospective applicant's consideration of the views raised during the pre-application consultation process.”*

21. SPR have complied with the above on the content of the PAC Report as far as is reasonably practicable.

2 Consultation Measures

22. **Table 2.1** provides an overview of the stages of consultation undertaken for the proposed Development.

Table 2.1: Stages of Consultation Undertaken for the proposed Development

Consultation activity	Details	Steps undertaken by SPR
Pre-application Consultation	Paragraph 2.17 of Circular 3/2013 states that: The prospective applicant must consult every community council any part of whose area is within or adjoins the land on which the proposed development is situated.	<p>In accordance with Regulation 7 the following Community Councils were informed in June 2020 of the proposed Development:</p> <ul style="list-style-type: none"> • Ardrishaig Community Council; • Arran Community Council; • Bute and Cowal Community Council; • East Kintyre Community Council; • Gigha Community Council; • Kilfinnan Community Council; • South Knapdale Community Council; • Tarbert and Skipness Community Council; and • West Kintyre Community Council. <p>Additionally, a leaflet was distributed at the same time to all residential and commercial properties within 10 km of the Site to introduce the proposed Development and inviting the public to participate in an upcoming online PIEs. A total of 1,394 leaflets were distributed. An example of the leaflet is provided in Appendix 1.</p>
Public Events	<p>Paragraph 2.19 of Circular 3/2013 states: The prospective applicant is required to hold at least one event for members of the public where they can make comments to the prospective applicant on the proposals.</p> <p>Paragraph 2.31 of Circular 3/2013 states: The public event should, as far as possible, be accessible to all members of the public. Consideration should be given to any additional needs of specific members of the public, such as people with disabilities. It may be appropriate for the public event to take place over a number of dates, times and places. Prospective applicants must ensure that individuals and community groups can submit written comments in response to the newspaper advertisement. There should be scope for people to take information away from public events and to respond in writing later, having considered what they have seen and heard.</p> <p>Paragraph 2.32 of Circular 3/2013 states: Presentations at events should follow the guidance at paragraph 2.29 about information. Staffing of events should include people who are</p>	<p>During the EIA process, SPR held a round of online Public Information Events on 25th November 2020, for three weeks. The event was extended for a further five weeks to 22nd January 2021 to allow for further feedback. The online PIE took the form of question-and-answer sessions to provide details of the proposed Development and the progress to date, to introduce the project team and to answer any questions and included banners displaying information, figures and visualisations comparable to the information provision of a traditional Public Information Day (PID).</p> <p>During that period, the PIE webpage was hosted on the SPR website, which is free to access and does not require a sign-up process. The public were able to access all the information through this route and it was available to read at whatever pace the person accessing it required and could be downloaded and printed if required. All</p>

Consultation activity	Details	Steps undertaken by SPR
	<p>knowledgeable about the proposals and about the planning issues likely to be of concern or interest to the public. PAC should not be treated by prospective applicants as merely a marketing exercise to promote the development.</p> <p>The Consultation on Proposed Changes to Pre-Application Consultation Requirements in Planning makes the following proposed change: An additional public event (i.e., a required minimum of two public events)</p> <p>'Coronavirus (Covid-19): planning guidance on pre-application consultations for public events' provides the following advice for a replacement online public event: <i>"The intention is to find alternative ways to enable the exchange of views that would otherwise be achieved by face to face interaction. That is, it is not considered sufficient for alternative consultation to allow only 'one way traffic', with those submitting views not seeing a response until the application itself is made with a PAC report"</i></p> <p>The Scottish Government also expect to see the following information <i>"hosted at a central, free, publicly accessible web location"</i>:</p> <ul style="list-style-type: none"> • <i>"set out the pre-application consultation steps being undertaken, the location of information, how to engage and time limits</i> • <i>identify the location of the development site</i> • <i>present the proposal for the site; and</i> • <i>be as user friendly as possible."</i> 	<p>awareness raising measures clearly referenced the web location. Also, all other accessibility conditions were also met.</p> <p>The PIE webpages are no longer accessible on the project website. However, a summary is still available to view, and it is possible to submit any questions to the project team, via the SPR project website: https://www.scottishpowerrenewables.com/pages/earraghail_renewable_energy_development.aspx</p> <p>Prior to the hosted PIE in November and during the summer of 2020, SPR intended to host an initial PIE between June and July 2020. However, in response to feedback from the local community, the planned PIE was cancelled. Nevertheless, valuable feedback was still received through written feedback forms and email. The Covid-19 pandemic and restrictions were impeding the local community's ability to engage meaningfully in the planning process within the statutory timelines and an extension to the planned submission date was requested. SPR acquiesced to these requests and extended the planned submission deadline to early 2022 and subsequently rescheduled the PIE to November 2020. As already mentioned, although the planned event was cancelled, meaningful information was still gathered during that period, where feedback received was still factored into the assessment.</p> <p>Website statistics are included in Appendices 2 and 3.</p>
Advertisement	<p>Paragraph 2.19 of Circular 3 states: Notice of this 'public event' must be published at least 7 days in advance in the Steps column in a newspaper circulating in the locality of the proposed development.</p>	<p>The PIE was advertised by a leaflet distributed to the same residential and commercial within 10 km of the Site, and an advert in the local newspapers, the Campbeltown Courier and Argyllshire Advertiser (including online versions). The extension of consultation period was advertised in the same local newspapers.</p> <p>Posters publicising the Public Information Events were distributed to local groups and community organisations who offered to display them locally and share them with interested parties and on their social</p>

Consultation activity	Details	Steps undertaken by SPR
		<p>media accounts. The local community councils and local councillors were also notified in advance by email (on June 2020) and provided with a poster for the event.</p> <p>A copy of each advert for the PIEs can be found in Appendix 2 and example correspondence with community councils and local councillors in Appendix 4.</p> <p>A total of 1,394 leaflets were distributed to the same residential and commercial addresses within 10 km of the Site. The leaflet stated that anyone could have any of the documents contained within the online PIEs emailed or posted to them.</p>
Project Website and Project Mailbox	<p>'Coronavirus (Covid-19): planning guidance on pre-application consultations for public events' states that:</p> <p><i>"Prospective applicants are also still required to make information available to the public, which can be online, and allow comments to be submitted to them by a specified date"</i></p>	<p>A project website was established at the beginning of 2019 while the mailbox was established in May 2020. The website provides outline information for the proposed Development and is available at: https://www.scottishpowerrenewables.com/pages/earraghail_renewable_ene_rgy_development.aspx The mailbox was created to allow for members of the public to contact the project team directly with comments, questions or requests for further information.</p>

23. In addition to specific regulations and guidance outlined in **Table 2.1**, all pre-application consultation has followed, where reasonably practicable, the general principles outlined in circular 3:2013-Development Management Procedures, namely:

- 2.6: *"PAC does not take away the need for, and right of, individuals and communities to express formal views to the planning authority during the planning application process itself. This should be emphasised by the prospective applicant during PAC."*
- 2.24: *"Prospective applicants should consider the timing of their PAC with regard to pre-application discussions with the planning authority and statutory consultees. Either discussion may identify constraints on proposals or the ability to amend them."*
- 2.27: *"Prospective applicants should have meaningful and proportionate engagement with those who represent the views of potentially affected communities, guided by PAN 3/2010: 'Community Engagement', the National Standards for Community Engagement or other locally agreed or adapted framework or set of principles"*
- 2.29: *"Prospective applicants should consider additional measures for publicising PAC activities, such as use of their own web sites to host information. Information issued as part of PAC should be factually accurate, easy to understand, jargon free, accessible and relevant. It should be made available in appropriate formats and provided in good time to enable people to take part and discuss their views with others."*
- 2.30: *"Prospective applicants will gain less from poorly attended or unrepresentative PAC events. For this reason, they should ensure that processes are put in place that will allow members of the community to participate meaningfully in any public event."*
- 2.33: *"There is a need to emphasise to communities that the plans presented to them may alter in some way before the final proposal is submitted as a planning application. Ideally, those consulted or who expressed views could be given a*

chance to comment on any significant changes to proposals being considered as a result of PAC, before the application is finalised.”

2.1 Scoping

24. A pre-application meeting was held with the Energy Consents Unit on 20 February 2020 where the scale of the proposed Development was discussed, as well as the plans for the site to accommodate hybrid technologies such as BESS and solar. Other points of discussion included:
- the proposed scale of the proposed Development including plans for hybrid technologies;
 - likely tip height of the turbines on site;
 - recent and proposed site surveys and investigations;
 - the overall approach to Scoping;
 - constraints and opportunities for enhancement; and
 - the likely programme for Public Information Days.
25. RSK Environment Limited (RSK), responsible for leading the Scoping exercise, issued a request for a scoping to the ECU and a scoping opinion was received from the ECU on 10th September 2020. The response was analysed, relevant points taken forward and used to inform the assessment process and develop the design.
26. The following consultees were contacted as part of the Scoping exercise:
- Argyll and Bute Council;
 - Historic Environment Scotland (HES);
 - NatureScot;
 - Scottish Environment Protection Agency (SEPA);
 - Energy Consents Unit (ECU);
 - Ardrishaig Community Council;
 - Argyll District Salmon Fisheries Board
 - Argyll Fisheries Trust;
 - Arran Community Council
 - Atkins;
 - BT (Openreach)
 - Bute and Cowal Community Council;
 - Civil Aviation Authority – Airspace;
 - Crown Estate Scotland;
 - East Kintyre Community Council;
 - Ericsson;
 - Fisheries Management Scotland;
 - Forestry and Land Scotland;
 - Gigha Community Council
 - Glasgow Prestwick Airport;
 - John Muir Trust;
 - Joint Radio Company;
 - Kilfinnan Community Council;
 - Marine Scotland;
 - Met Office;
 - MOD (DIO Safeguarding);
 - Mountaineering Council of Scotland;
 - Mountaineering Scotland;
 - NATS Safeguarding;
 - Network Rail North Ayrshire Council
 - Nuclear Safety Directorate (HSE);
 - O2 Telefonica;
 - Ofcom (Spectrum Licensing);
 - Royal Yachting Association Scotland;
 - RSPB Scotland;

- Scottish Forestry;
- Scottish Rights of Way and Access Society (ScotWays);
- Scottish Water;
- Scottish Wild Land Group (SWLG);
- Scottish Wildlife Trust;
- South Knapdale Community Council;
- Tarbert and Skipness Community Council;
- The Coal Authority;
- The Kintyre Way;
- The Woodland Trust Scotland;
- Transport Scotland;
- Visit Scotland;
- Vodafone;
- West Kintyre Community Council; and
- West of Scotland Archaeology Service (WOSAS).

27. Consultation responses received as part of the Scoping process have been considered in the EIA and the issues raised are reported in **Chapter 6** of the EIA Report.

28. Further consultation was conducted to further refine the scope and assess the finalised layout with the following consultees:

- Argyll and Bute Council;
- North Ayrshire Council;
- Historic Environment Scotland;
- SEPA; and
- NatureScot.

2.2 Community Council Consultation and Local Councillors

29. SPR have kept the nine Community Councils local to the proposed Development informed of project progress in relation to Scoping exercise in May 2020. SPR also sent emails to the Community Councils and local community councillors to introduce the proposed Development in June 2020, invite them to participate in the PIE events (see example emails to the community councils and local councillors in **Appendix 4**). The nine Community Councils that have been contacted are:

- Ardrishaig Community Council;
- Arran Community Council;
- Bute and Cowal Community Council;
- East Kintyre Community Council;
- Gigha Community Council;
- Kilfinnan Community Council;
- South Knapdale Community Council;
- Tarbert and Skipness Community Council; and
- West Kintyre Community Council.

30. The local councillors that have been contacted are:

- Morag Branson (West Kintyre Community Council);
- Ian Brodie (East Kintyre Community Council);
- William McSparran (Gigha Community Council);
- Lynda McKinlay (South Knapdale Community Council);
- Gina Chicken (Tarbert and Skipness Community Council);
- Catherine Bowe (Ardrishaig Community Council);
- Jan Watson (Kilfinnan Community Council);
- Marlene Hill (Bute and Cowal Community Council);
- Anne Horn (Kintyre and the Islands Ward);
- Alastair Redman (Kintyre and the Islands Ward);
- Robin Currie (Kintyre and the Islands Ward);

- Rory Colville (South Kintyre Ward);
- Donald Kelly (South Kintyre Ward);
- John Armour (South Kintyre Ward).

2.3 Consultation with other Organisations

31. Introductory meetings were held with the Energy Consents Unit, Argyll and Bute Council, NatureScot, and SEPA at the outset.
32. Correspondence and meetings have been held with the Kintyre Way, a charitable organisation interested in promoting sustainable use of the Kintyre Way Scottish Charitable Incorporated Organisation (SCIO), regarding enhancement measures to the Kintyre Way within the Site that could be included in the proposed Development.
33. Correspondence was undertaken with NatureScot to refine the approach to landscape and visual impact assessment, and on ornithological surveys. A meeting was held with Argyll and Bute Council, the Energy Consents Unit and North Ayrshire Council to further refine the approach to landscape and visual impact assessment.
34. SPR entered into detailed correspondence with Skipness Estate over the sharing of data and permission to undertake surveys on the Estate's land to inform the assessment.

2.4 Public Information Events

35. Due to the Covid-19 pandemic, restrictions on public gatherings meant that holding a face-to-face event was not possible. An online event was instead held to update the community on the proposed Development's progress and design.
36. An online PIE was organised for June 2020, but then subsequently cancelled, following feedback from the local community. Meaningful information was still received at this time and factored into the EIA.
37. From November 2020 until January 2021, a new PIE was undertaken to establish dialogue with the local community regarding the proposed Development. It was hosted online and lasted for eight weeks. Members of the public could request for any of the documents contained within the PIE to be emailed or posted to them.
38. The PIE contained eight "exhibition boards" that they could browse, similar to a traditional PID. The PIE banners were as follows:
- Board 1: Introduction;
 - Board 2: Site Overview and Key Facts
 - Board 3: Environment Impact Assessment
 - Board 4: Landscape and Visual;
 - Board 5: Cultural Heritage;
 - Board 6: Ecology and Ornithology;
 - Board 7: The Local Community;
 - Board 8; Next Steps; and
 - Feedback.

39. The PIE included interactable PDFs displaying the application boundary, site layout, project constraints and the ZTV, as well as photomontage visualisations giving a general representation of views of the proposed Development from key viewpoints. Members of the public were also encouraged to email the project team to provide feedback and to request visualisations from a specific location, if required. The PIE also allowed local residents to view the initial wind turbine layout and ask any questions specific to the proposed Development. Further information on the PIE is presented in **Sections 3** and **4** of this Report.

2.5 Website and Email

40. SPR hosts a page dedicated to the proposed Development on its website to allow people to view details about the Development and contact the project team for further information:

https://www.scottishpowerrenewables.com/pages/earraghail_renewable_energy_development.aspx

41. SPR can also be contacted at any time about the proposed Development by emailing:
EarraghailRenewableEnergyDevelopment@scottishpower.com.

3 Public Information Events

42. Due to the Covid-19 pandemic and restrictions on public gatherings the virtual information events were held online.
43. The PIEs were hosted from 25th November 2020 to 22nd January 2021 on the SPR project webpage: https://www.scottishpowerrenewables.com/pages/earraghail_renewable_energy_development.aspx.
44. This accords with the 'Coronavirus (Covid-19): planning guidance on pre-application consultations for public events' from the Scottish Government (2020) because:
- it was a "central, free, publicly accessible web location";
 - all of the information was available at this one web location;
 - no sign up was required to access the information;
 - members of the public could read the information at their own pace and could download and print it if required;
 - the public had a period of more than 7 days to submit questions or views electronically; and
 - SPR responded to all questions or requests for clarification received.
45. The online PIEs complied with the current General Data Protection Regulation (GDPR) obligations.
46. The PIEs were live for eight weeks, during which time participants could submit feedback forms. After the PIE had concluded the information remained available on the SPR website so that anyone who had missed the consultation period, or anyone who wanted to go back and re-visit any of the content, could still view the Event and all of its information. Although the feedback form was removed after the PIEs finished, people were still invited to contact the Project Team through the Project email address throughout the development of our Projects, ensuring that the principle of two-way communication was not limited to the PIE.
47. It must be noted that a round of public consultation was scheduled to for June 2020, which was then subsequently cancelled in response to feedback from the local community.

3.1 Notification

48. The PIE was advertised in several ways, to help ensure as many local residents as possible were made aware of the proposed Development in good time to enable them to take part and discuss their views with others. The notices were issued on 20th November 2020. On the 18th December 2020, additional notices were issued, advising that the PIE had been extended until the 22nd January 2021.
49. In accordance with 'Coronavirus (Covid-19): planning guidance on pre-application consultations for public events', the web location for the PIE was referenced in all awareness raising measures.

3.2 Newspaper Adverts

50. Regulation 7 of the Town and Country Planning (Development Management Procedure) (Scotland) Regulations 2013 requires that a notice is published in a local newspaper a minimum of seven days before the event is held. As the Circular suggests, the public notice should contain:
- a description of, and the location of, the proposed development;
 - details as to where further information may be obtained concerning the proposed development;
 - the date and place of the public event;
 - a statement explaining how, and by when, persons wishing to make comments to the prospective applicant relating to the proposal may do so; and
 - a statement that comments made to the prospective applicant are not representations to the planning authority and if the prospective applicant submits an application there will be an opportunity to make representations on that application to the planning authority.
51. Public notices, containing all the information required above, was placed the Campbeltown Courier and Argyllshire Advertiser. The notices were issued on 20th November 2020 and then on 18th December 2020 advising that PIE had been extended until 22nd January 2021. For the whole duration of Event, the public were able to submit questions or views

electronically for the duration of that time, which exceeded the required 7-day period in the Scottish Government legislation, assuming a seven-day notification period from the notification date, as outlined in Regulation 7, this would still give the public sufficient opportunity, fourteen days, to view the PIE and submit views or questions electronically. A copy of the notice is contained in **Appendix 2**.

3.3 Online Adverts

52. Online adverts were placed on the Campbeltown Courier and Argyllshire Advertiser websites. The online advert displayed the deadline for submission of comments and questions and included a link to the SPR project webpage, where the PIE could be accessed from. An example of the online advert can be seen in **Appendix 2**.

3.4 Posters

53. Posters were distributed to all nine community councils and local councillors when they were notified about the PIE. The recipients were invited to distribute the posters because of their local knowledge and connections with relevant stakeholders. The posters were an exact copy of the newspaper advert as seen in **Appendix 2**.

3.5 Information Available at PIEs

54. Copies of the Drawings and Plans that were available and on display at the PIEs are contained within **Appendix 2**. The information presented included: a site overview, a location plan for the proposed Development; details about the Environmental Impact Assessment process and survey work; details of community benefit; and information and facts about wind energy in general.

55. Three photomontage visualisations and a video were also available for the public to view and assess the likely visual effect from key viewpoints. The public were also invited to request visualisations from specific locations e.g., personalised views from their property.

3.6 Leaflets

56. In advance of the PIE, SPR distributed leaflets to 1,394 households within a 10 km radius of the proposed Development. The leaflets set out the purpose of the public events, provided details of the event, provided a description of the proposed Development and background on the proposals, provided an update on the project since the last PIE and provided contact details for requests for further information from SPR. A copy of the leaflet is provided in **Appendix 3**.

3.7 Consultation Feedback

57. Scottish Planning Policy (SPP) (paragraph 6) notes that throughout the planning system, opportunities exist for everyone to engage in the development decisions which may affect them. Engagement should be early, meaningful and proportionate. Expressions of support and concern should be taken into account in developing proposals.

58. Attendees to the November 2020 PIE were invited to complete a feedback form about the proposed Development. According to website traffic, there were 635 “new visitors” over the period between June 2020 – November 2020 who visited the Earraghail PIE website. During June and July 2020, a total of seven feedback forms were returned and 18 emails regarding were sent to the project mailbox during the period the webpage went live. To ensure that the low level of feedback was not reflective of a low level of awareness, changes to the awareness raising measures were made for the PIE, namely by placing the name of the proposed development on the front of leaflets issued to members of the public, and extending the duration of the PIE by a further five weeks to January 2021 (see Table 2.1 above) .

59. In addition to the feedback received in relation to the PIE, four further comments and queries have been submitted to the project mailbox, which have been included here for completeness.

60. Comments suggest that out of the 25 respondents, 3 were in support of the proposed Development, 10 had expressed some degree of negative or opposing comments, 3 made no comment on their views of the proposed Development and 9 expressed no opinion but requested additional information.

61. A summary of comments received is presented in **Table 3.1**. SPR responded directly via email to everyone who submitted a feedback form during the PIE or who contacted the project mailbox throughout the duration of the EIA process. This was the preferred method for those who contacted SPR, and alternative arrangements would have been made if required.

Table 3.1: Feedback Received from the November 2020 - January 2021 PIE

Topic	Feedback
Access	<ul style="list-style-type: none"> Concern on how access may be limited to Kintyre Way and other walking routes during construction.
Community Benefits	<ul style="list-style-type: none"> Concern around the duration of the community benefit scheme and the level of benefits available per Megawatts installed. Concern around the lack of opportunities of community shared ownership. Improved access for wheelchair users and pushchairs. Support for community events. Redevelopment of community facilities. Support for renewable energy.
Design	<ul style="list-style-type: none"> Height of turbines. Proposed location – proximity to communities, archaeological assets, and conservation features.
Environment, ecology, and ornithology	<ul style="list-style-type: none"> Concern about ancient woodland areas. Concern about bird species. Concern about habitats and conservation elements.
Traffic and Transportation	<ul style="list-style-type: none"> Increase in traffic. Road closures due to the transportation of heavy wind turbine components.
Population and Human Health	<ul style="list-style-type: none"> Concerns around impacts of turbines on human health.
Archaeology	<ul style="list-style-type: none"> Concern about views from Tarbert Castle and other assets of archaeological importance Concern around the preservation of archaeological assets present onsite.
Landscape and Visual	<ul style="list-style-type: none"> Suggestion for further visualisations and viewpoints. Concern about visual impacts from Tarbert, Skipness, The Kintyre Way and the surrounding areas. Height and lighting impact of turbines. Cumulative effects from other wind farms proposed in the area (Sheirdrim Hill proposal). Effects from other energy infrastructure that may be required to support the proposed Development (e.g., commercial electricity transmission pylons).
Socio-economic	<ul style="list-style-type: none"> Impact on tourist attraction sites such as, Kintyre Way, Tarbert Caste Area and Portavadie. Impact on amenity of walking routes traversing and surrounding the Site. Concern around housing prices being affected by the proposed Development.
Noise	<ul style="list-style-type: none"> Concerns around noise and its impacts. Users of Kintyre Way.

4 Conclusions

62. All of the topics and questions raised through the consultation have been addressed in the EIA Report for the proposed Development. For example, the outcomes of the public consultation in winter 2020-2021 were used to inform the further refinement of the design; including a reduction in the height of turbines proposed, moving certain turbines to reduce visual impacts potentially experienced from the south (e.g., Skipness and the north of Arran) and to reduce impacts on the setting of the designated assets of Skipness Castle and Kilbrannan Chapel.
63. SPR have undertaken an extensive consultation process with statutory and non-statutory consultees and the local community. The consultation feedback received has been considered in the EIA and iterative design processes.
64. Up to 200-meters turbines were considered on the Site in Scoping. Following information obtained from the extensive feedback received at the 2020/21 PIE, as well as information provided by the local community when during the Summer of 2020, the final layout only comprised 180-meter turbines. Furthermore, during the final stages of the EIA process, SPR decided to reduce the number of wind turbines being proposed from 14 to 13, removing one turbine being proposed for the southern section of the proposed Development.
65. Concerns and questions raised by consultees and members of the public at the PIE have been addressed through the assessments presented in the EIA Report.

4.1 Publication of the EIA Report

66. SPR has a duty to undertake statutory publication of the EIA Report in accordance with Part 5 of the Electricity Works (Environmental Impact Assessment) (Scotland) Regulations 2017 and the Electricity (Applications for Consent) Regulations 1990.
67. A notice will be published as follows:
- on the SPR project website;
 - in the Herald;
 - in the Edinburgh Gazette
 - In the Argyllshire Advertiser, the Campbeltown Courier and the Oban Times.
68. In addition to the formal notifications of the application SPR has:
- made available a Non-Technical Summary (NTS) of the EIA Report and USB of the entire application submission to the local community councils on request;
 - made available free of charge further copies of the Non-Technical Summary of the EIA Report;
 - maintained a dedicated email address (EarraghailRenewableEnergyDevelopment@scottishpower.com) to receive comments relating to the Proposed Development; and
 - maintained ongoing contact with local residents and Community Councils at their request.

APPENDICES



Earraghail Renewable Energy Development

Public Consultation Leaflet



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Why are we contacting you?

ScottishPower Renewables (SPR) is investigating the potential for a renewable energy development on an area of land at the northern end of the Kintyre peninsula. The turbines will be located 6 km south of Tarbert within Argyll and Bute. The proposed Development is anticipated to consist of about 14 wind turbines with tip heights of up to 200 m. The deployment of other renewable technologies within the Site is also being proposed, including an energy storage facility and, potentially, ground-mounted solar panels.

Early consultation is key to the way we develop projects. We believe in open consultation with communities and stakeholders to inform the design process. However, current COVID-19 legislation¹ prevents face-to-face consultation and this may not be permitted for the foreseeable future. SPR remains committed to undertaking meaningful and wide-reaching consultation during this difficult and challenging time. We are, therefore, contacting you to provide you with information on our proposal and to let you know how you can provide feedback.

Who are we?

SPR is part of the ScottishPower group of companies operating in the UK under the Iberdrola Group, one of the world's largest integrated utility companies and a world leader in wind energy. ScottishPower now only produces 100% green electricity – focusing on wind energy, smart grids and driving the change to a cleaner, electric future. The company is investing over £4 million every working day² to make this happen and is committed to speeding up the transition to cleaner electric transport, improving air quality and, over time, driving down bills to deliver a better future for everyone.

SPR is at the forefront of the development of the renewables industry through pioneering ideas, forward thinking and outstanding innovation. Its ambitious growth plans include expansion of its existing onshore wind portfolio, investment in new large-scale solar deployment and innovative grid storage systems, including batteries. The company is also delivering the Iberdrola Group's offshore windfarms in the southern North Sea off East Anglia. With over 40 operational windfarms, SPR manages all its sites through its world-leading control centre at Whitelee Windfarm, near Glasgow.

¹The Town and Country Planning (Miscellaneous Temporary Modifications) (Coronavirus) (Scotland) Regulations 2020: Scottish Government: 2014. Available at www.legislation.gov.uk/ssi/2020/124/contents/made

²Between 2018 and 2022

ScottishPower Renewables in Argyll

SPR has been working alongside communities across the UK for nearly two decades and has, to date, contributed more than £38 million in benefit funds to support initiatives and projects for those communities local to its windfarm sites. The company's existing local windfarms, Cruach Mhor, Clachan Flats and Beinn an Tuirc, have contributed more than £1.8 million to support Argyll and Bute communities.

With the development of these sites nearby, SPR is continuing its history of working positively with local communities within the south of Scotland and applying this approach to the northern region. We are keen to create employment opportunities during the construction and operation of our windfarms that can be delivered locally to benefit those who live near our sites.

The flexible approach adopted by SPR has empowered local communities to decide what the community benefit is spent on. This has resulted in a fantastic diversity of projects being delivered, from improving local amenities, including town halls, cinemas and local youth clubs, to supporting work experience places, educational workshops and much more.

Drivers for renewable energy

The UK government, the Scottish Government and the Highland Council have all declared a "climate emergency" and are committed to ensuring that an increased proportion of electricity is generated from renewable energy sources in order to meet carbon emission targets. The Climate Change (Emissions Reduction Targets) (Scotland) Act 2019 introduced a target of net zero greenhouse gas emissions by 2045 at the latest. Scotland will also have to reduce emissions by at least 56% by 2020, 75% by 2030 and 90% by 2040. These are currently the most ambitious statutory targets in the world. Scotland's Climate Change Plan 2018–2032, which sets out the road map for achieving those targets, has set the goal of 50% of Scotland's energy needs to be met by renewable energy by 2030.

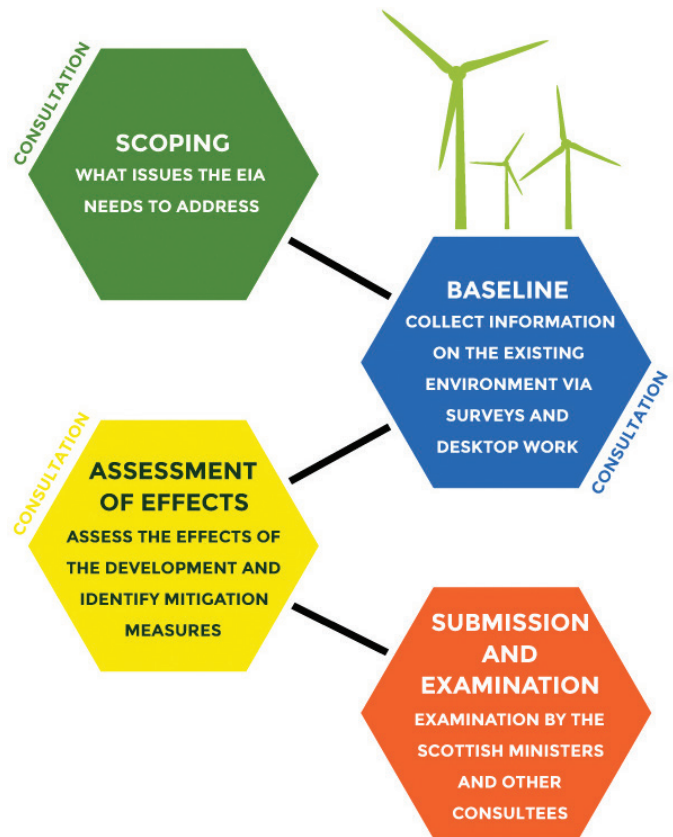
Powering your community

SPR is committed to being a responsible developer of renewable energy and strives to be a good neighbour in all areas of its work. We encourage as many people as possible to get involved in and to learn more about our projects, particularly in understanding the local economic and social benefits our developments can create. As the development of Earraghail progresses, we will engage with communities, stakeholders and local councils to understand how benefits could be delivered to best meet the needs of the local area, should the proposed Development be consented.

Environmental Impact Assessment and design

An Environmental Impact Assessment (EIA) is required for the proposed Development, and this will be informed by the consultation responses that SPR receives from stakeholders to the direct scoping exercise that is currently under way. These scoping responses will confirm the environmental aspects that are to be assessed.

We have been undertaking bird surveys in the vicinity of the Site since 2019, and several feasibility studies have been conducted that have helped to shape the proposed Development. We will also be undertaking a range of further environmental surveys and technical studies throughout the course of this year (when possible and in line with government guidance) to ensure that the potential environmental effects are fully understood and mitigated. We will also give careful consideration to how this proposed Development looks within the existing landscape, considering its visibility from key viewpoints in the surrounding area and how it "fits" with surrounding windfarms in the area.



Next steps

We will use the findings from environmental surveys, technical studies and consultation feedback to continue to shape the design of the proposed Development ahead of submitting an application to the Scottish Government Energy Consents Unit, which we anticipate will be in summer 2021.

CONTACT

If you require more information on the proposed Development, have a query or wish to provide feedback, please contact us directly.

WEBSITE:

www.scottishpowerrenewables.com/pages/earraghail_renewable_energy_development

PROJECT E-MAIL:

earraghailrenewableenergydevelopment@scottishpower.com

TELEPHONE:

+44 (0)141 614 9087

POST:

Earraghail Renewable Energy Development Project Team
ScottishPower Renewables
9th Floor ScottishPower Headquarters
320 St Vincent Street
Glasgow G2 5AD

Earraghail Renewable Energy Development

Public Information Event

ScottishPower Renewables (SPR) invites you to participate in its Public Consultation on the draft proposals for the Earraghail Renewable Energy Development (Earraghail RED). SPR is proposing to develop the Earraghail RED at the northern end of the Kintyre peninsula and with turbines located 6 km south of Tarbert, within Argyll and Bute.

The proposed Development is anticipated to consist of approximately 14 wind turbines with tip heights of up to 200 m. The deployment of other renewable technologies within the Site is also being proposed, including battery storage and solar photovoltaic (solar PV) generation.

Early consultation is key to developing our projects and, throughout the development process, we ensure local communities and stakeholders are given the opportunity to provide feedback and are kept informed of project progress.

Given the restrictions requiring social distancing, instead of holding Public Information Days, a Public Information Event on the proposals will be available online from 25 November 2020 on the project website:

www.scottishpowerrenewables.com/pages/earraghail_renewable_energy_development

The online Public Information Event will include information banners as well as visualisations to help to give an impression of what the proposed Development could look like from different viewpoints in the area.

The event will include a link to a feedback form through which comments and questions, as well as any requests for further information, can be submitted directly to the Project Team. Alternatively, you may contact the Project Team by emailing

earraghailrenewableenergydevelopment@scottishpower.com

or writing to

ScottishPower Renewables
Earraghail Renewable Energy Development Team
9th Floor ScottishPower Headquarters
320 St Vincent Street
Glasgow
G2 5AD

If you have any questions or wish to make comments on the proposal, we request that these are submitted via the feedback form by 16 December 2020.

Please note that this notice does not relate to an application and that any comments made on the proposals to SPR at this stage are not representations to the Scottish Ministers. If an application is subsequently submitted, normal publicity will be undertaken at that time and you will have the opportunity to make a formal representation then.

www.scottishpowerrenewables.com



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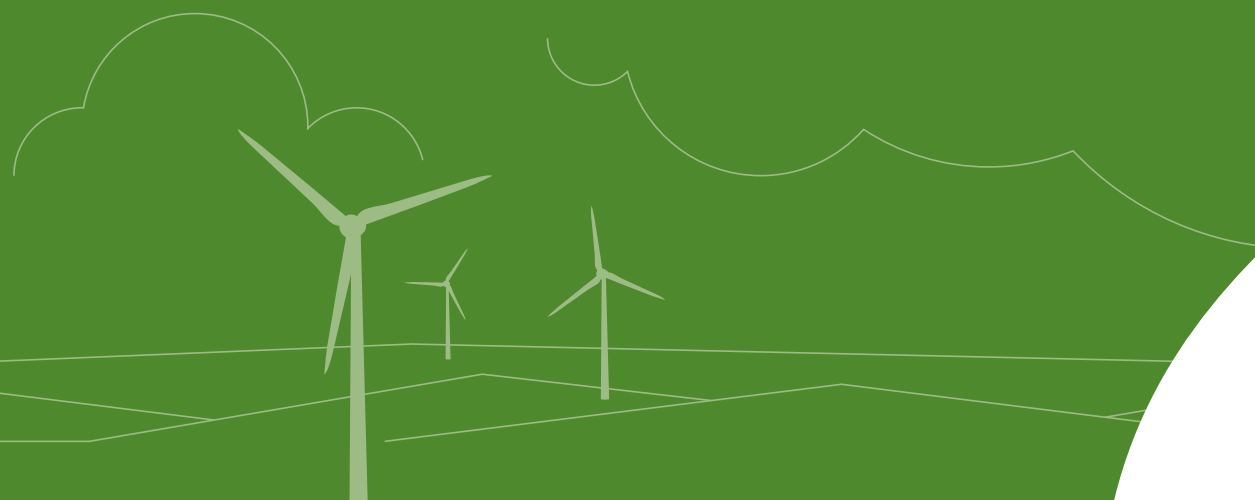
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www.scottishpowerrenewables.com



Earraghail Renewable Energy Development

Public Information Event (Extended)

The consultation period for the project has been extended through until 22nd January 2021. Please review and submit your comments and questions on the proposals via the feedback form on the project website by 22nd January 2021.

[Click here to find out more](#)

From: [REDACTED] <[REDACTED]@wsp.com> on behalf of [REDACTED]
Sent on: Wednesday, November 11, 2020 2:00:07 PM
To: [REDACTED]@argyll-bute.gov.uk
CC: [REDACTED] <[REDACTED]@scottishpower.com>
Subject: RE: Earraghail Renewable Energy Development Virtual Public Information Event

Dear Councillor Colville,

Following on from my below email, If you would like to discuss SPR's Earraghail Renewable Energy Development (Earraghail RED) Proposal prior to the public information event, I, as part of the SPR project team, can be contacted immediately at the following email address: EarraghailRenewableEnergyDevelopment@scottishpower.com

As mentioned, SPR are due to launch a Virtual Public Information Event on the 25th November 2020 that will identify how the design of the proposal has evolved to take on board public and consultee feedback, as well as the findings of the environmental studies and assessments that have been completed. This online Event will be available through the SPR website at:

https://www.scottishpowerrenewables.com/pages/earraghail_renewable_energy_development.aspx

SPR will also place an advert (both physical and online) in the Argyllshire Advertiser and Campbeltown Courier to help notify local residents of the Event.

Kind regards,

[REDACTED]

[REDACTED] BSc (Hons) MEnvSc CEnv
Associate | Ground & Water



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