

# **Sheirdrim Renewable Energy Development**

## **Planning Statement**

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# Planning Statement

## Executive Summary

1. The UK and Scottish governments have set ambitious climate change targets. The Scottish government declared a climate emergency in May 2019 and has recently approved the Climate Change Bill which has passed into law the requirement for a 100% reduction in CO<sub>2</sub> emissions by 2045. ScottishPower Renewables (SPR) is helping to lead the fight against climate change by developing renewable energy projects, such as this fully integrated renewables scheme called Sheirdrim Renewable Energy Project (proposed Development).
2. 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 £4m every working day in 2019 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. With over 40 operational windfarms, SPR manages all its sites through its world leading Control Centre at Whitelee Windfarm, near Glasgow.
3. The proposed Development is located on the Kintyre Peninsula within Argyll and Bute and is situated 11 km south west of Tarbert within the Achaglass and Gartnagrenach estates. It would comprise 19 wind turbines which would generate around 114 MW, 20 MW of ground mounted solar arrays, and associated site infrastructure such as substation and access tracks. It would produce around 134 MW or between 360 - 380 GWh of electricity annually, based on a capacity of 35.8%. The proposed Development would also comprise 38 MW of battery storage and so provide flexible balance of energy and the delivery of the full potential of renewable energy to meet the demands of the national grid. The proposed Development would also include the creation of new publicly accessible footpaths, a bird hide, shelter on the Kintyre Way and information boards in respect of cultural heritage. It is anticipated that the proposed Development would have a carbon payback period of approximately 1.6 years, when compared to the fossil fuel mix of electricity generation.
4. SPR intends to submit an application for the proposed Development under Section 36 of the 1989 Electricity Act. The application does not seek to limit the lifetime of the proposed Development. In support of the application, SPR has undertaken an Environmental Impact Assessment (EIA) and produced its findings in this EIA Report. The EIA Report informs readers of the nature of the proposed Development, likely significant environmental effects and measures proposed to protect the environment, during site preparation, construction, and the operation of the proposed Development.
5. By using the latest turbine technology, each turbine at the proposed Development could produce around 6 MW. The latest solar technology would be used in order to maximize the potential of that resource. This would help to deliver new renewable energy capacity which is needed to help the UK and Scottish Government meet its climate goals, address the climate change emergency and provide low-carbon power that assist in the reduction of consumer bills.
6. The energy capture estimated for the proposed Development is the result of the overall positive impact of accommodating larger rated capacity and the larger rotor (swept area) available at higher hub heights whilst respecting environmental impacts. The resultant efficiency, economics and commerciality of the scheme would enable SPR to reduce the cost of energy from the proposed Development, giving a positive benefit to consumers in terms of electricity cost. In recent years, the onshore wind industry has experienced the reduction in supply of smaller turbines across Europe due to lack of demand from mainland Europe, where the tendency is to install turbines at higher tip heights (e.g. 175 – 240 m to blade tip). Therefore, it is highly unlikely that a range of smaller turbines (e.g. 120 m)

would be available at competitive prices by the time the proposed Development is ready to be constructed, if consented. Larger turbines need to be considered and accepted if onshore wind is to continue to make a contribution to both the UK and Scottish Government's renewable energy targets.

7. During construction a total direct spend of approximately £148 million is anticipated, of this £55 million would be spent in Scotland, assuming that the turbine towers are procured in Campbeltown, as is the case for Beinn an Tuirc Phase 3. The Scottish economy would benefit by some £230 million net Gross Value Added (GVA) during construction. During the operational phase, based on a nominal 40 year period, the proposed Development would contribute some £60.4 million in GVA to in Argyll and Bute, and £83.8 million to the economy of Scotland as a whole.
8. During the 22 months' construction phase, the proposed Development is expected to support 150 jobs on site at the peak of construction activity. Around 268 Full Time Equivalent (FTE) jobs would be created during the wider construction period. During the operational phase, if consented, the proposed Development is expected to create between 4 and 7 FTE jobs in Argyll and Bute.
9. The proposed Development includes the offer of community shared ownership which has the potential to create important net economic benefits. To date, SPR's operational windfarms have voluntarily contributed more than £29 million of support towards community initiatives across the UK, SPR has voluntarily awarded over £1.6 million in community benefit funding to communities in Argyll & Bute, deriving from its four existing windfarms: Beinn an Tuirc, Beinn an Tuirc 2, Cruach Mhor, and Clachan Flats. For the proposed Development, SPR is committed to offering a package of community benefits to local communities that could include the opportunity for community benefit and to invest in the operational development, should it be consented. SPR will engage with local stakeholders to identify which communities would be appropriate to participate in these benefits. SPR will keep local communities informed about these benefits as the project progresses and, in line with Scottish Government guidance, will provide information in a timely manner so the communities are able to fully assess the opportunity.
10. The potential for effects on a wide variety of environmental factors have been considered through the Environmental Impact Assessment process. Where identified, the significant environmental effects of the proposed Development have been mitigated, as far as reasonably possible, through an extensive process of design iteration. The proposed Development makes efficient use of the existing network of forest roads and access tracks that are already located onsite for existing forest and windfarm operations. The proposed Development includes mitigation and enhancements relating to forestry, access and construction. These would ensure that the proposed Development is delivered in an appropriate manner which would benefit the environment in a wide variety of ways.
11. The proposed Development is located in an area which is considered to be suitable for windfarm development in the context of Scottish Planning Policy. It is acknowledged that the proposed Development would result in a number of significant landscape and visual effects. This is expected from any renewable energy development, including wind turbines of this kind and an inevitable consequence of the development form. However, given the careful design process, the landscape and visual impacts of the proposed Development are considered to be acceptable. There would be no overwhelming or overbearing residential visual effects from the proposed Development.
12. The proposed Development is for a commercial scale Renewable Energy Development which would deliver clean energy to the national grid at a low cost. If the issue of the climate emergency is to be addressed then developments such as the proposed Development must come forward and, subject to environmental considerations, be consented to meet the need for clean energy at a reasonable cost. The proposed Development is considered to be an important and strategic opportunity to contribute to the Scottish Governments ambitious targets for renewable energy. It would make a valuable contribution to the fight against climate change. The potential of the Site has been maximised whilst respecting the environmental constraints and sensitivities of the Site and the surrounding area. The proposed Development for which consent is sought is considered to be acceptable.

# 1 Introduction

13. The UK and Scotland's current climate change ambitions are amongst the highest in Europe. The Scottish government declared a climate emergency in May 2019 and has recently passed the Climate Change Bill which has passed into law the requirement for a 100% reduction in CO<sub>2</sub> emissions by 2045. This is supported by the Scottish Energy Strategy's (Scottish Government 2017) target of 50% of all energy (including transport, heat and electricity) being supplied from renewables by 2030. Furthermore, on 26 September 2019, Argyll and Bute Council set up an Environmental Action Group which will focus on actions to reduce carbon emissions in the region.
14. ScottishPower Renewables (UK) Ltd (SPR) is leading the UK in the operation and development of renewables and fully supports the fight against climate change and proposes to develop Sheirdrim Renewable Energy Development on Kintyre in Argyll and Bute. This would be a fully integrated renewable energy solution in direct response to meeting national and international climate change targets. Sheirdrim Renewable Energy Development would be able to regulate output and provide clean power to people's homes when they need it most and would represent a state of the art development for Argyll and Bute. As well as contributing to targets for renewable energy, the project would provide opportunities for community investment and create further employment opportunities in the local area.
15. Sheirdrim Renewable Energy Development is located within the Argyll and Bute Council (A&BC) administrative area and comprises 19 wind turbines, battery storage and ground mounted solar arrays with associated infrastructure (the proposed Development) on land (the Site) within the Achaglass and Gartnagrenach estates located approximately 11 km south west of Tarbert, centred on NGR 181302, 657098, as shown on **Figure 1**. The application boundary covers the area shown on **Figure 2** and an aerial photograph of the Site is shown on **Figure 3**, showing the terrain and land use of the Site and the immediate surrounding area.
16. The proposed Development is described in further detail in **Chapter 2** of this Planning Statement.
17. The proposed Development would exceed 50 MW, therefore, the proposed Development constitutes a Schedule 2 development as provided for by the Electricity Works (Environmental Impact Assessment) (Scotland) Regulations 2017 (the EIA Regulations).
18. SLR Consulting Ltd (SLR) has been appointed to undertake an Environmental Impact Assessment (EIA) to determine and evaluate the potential effects of the proposed Development. The results of the EIA are presented in the Environmental Impact Assessment Report (EIA Report) which is submitted in support of the application which this Planning Statement is submitted in respect of.

## 1.1 Purpose of this Planning Statement

19. The application for the proposed Development is submitted to the Scottish Ministers under Section 36 (S36) of the Electricity Act 1989 (the 1989 Act). The applicant, by way of the S36 process, requests that the Scottish Ministers issue a S36 Consent in respect of the proposed Development, together with a Direction under Section 57(2) of the Town and Country Planning (Scotland) Act 1997 as amended (the 1997 Act) that planning permission is deemed to be granted for the proposed Development.
20. This Planning Statement sets out the background and policy and planning considerations relevant to the proposed Development. It is structured as follows:
  - **Chapter 1** includes the introduction to the Planning Statement, provides the framework for decision making and provides background information on the applicant;
  - **Chapter 2** provides a brief description of the Site and the location of the proposed Development and a description of the proposed Development itself including key features of mitigation which are embedded in design;
  - **Chapter 3** sets out the key benefits of the proposed Development.

- **Chapter 4** sets out the Planning Assessment for the proposed Development. It summarises the matters which are considered to be relevant to the decision making process – the Key Considerations for determination of the application; and
- **Chapter 5** contains a conclusion in respect of the planning case for the proposed Development.

## 1.2 Statutory Framework

21. As identified previously, the application for the proposed Development requires to be made under Section 36 of the Electricity Act 1989 because the installed capacity would exceed 50 MW.
22. SPR is a licensed electricity generator in terms of the Electricity Act 1989. As a consequence of this, SPR is obliged when formulating proposals of 10 MW or more to have regard to the duties imposed upon it by Schedule 9(3)(1)(a). In formulating proposals it shall have “specific regard to the desirability of preserving natural beauty, of conserving flora, fauna and geological or physiographical features or special interest in protecting sites, buildings and objects of architectural, historic or archaeological interest.”. Furthermore, in terms of sub-paragraph (b), SPR is under a duty to do what it reasonably can to mitigate any effect which the proposals would have on the natural beauty of the countryside or on any such flora, fauna, features, sites, buildings or objects. In addition, Schedule 9 also imposes duties to avoid impact on fisheries and fish. The Applicant has fulfilled all these duties by undertaking the project formulation as reported in the Environmental Impact Assessment Report accompanying the application. The EIA process encompasses consideration of all the matters set out in Schedule 9(3)(1)(a). Indeed the EIA process has a broader topic range than that contained in the sub-paragraph. Furthermore, where significant effects are found as part of the EIA process, appropriate mitigation is proposed. The Environmental Impact Report accompanying the application sets out in detail how the Applicant has approached the design of the scheme and how very careful consideration has been given throughout that process to the matters that are listed in sub-paragraph (1)(a). In the circumstances, the Applicant has fulfilled the statutory requirements of Schedule 9.
23. In addition, Schedule 9 also imposes duties upon the Scottish Ministers when determining Section 36 applications. They are obliged to have regard to desirability of the matters mentioned in paragraph (a) of sub-paragraph (1) and must also have regard to the extent to which the Applicant has complied with their duties to mitigate any effects on those resources. Again, the Scottish Ministers can be satisfied that the EIA process has been undertaken appropriately and addresses these matters comprehensively.
24. In addition to the above processes, the fact that the proposed Development is Schedule 2 development requires the Applicant to undertake an Environmental Impact Assessment and also to report the outcome of that process through the Environmental Impact Assessment Report. The Electricity Works (Environmental Impact Assessment) (Scotland) Regulations 2017 set out the legal requirements of the process. As part of the process, SPR have applied for a Scoping Opinion in terms of Regulation 12 and have provided an Environmental Impact Assessment Report which complies with the requirements of Regulation 5. Regulation 5 also incorporates further information requirements as set out in Schedule 4. The Environmental Impact Report has set out in detail how compliance with these provisions has been considered and achieved. In addition, the Environmental Impact Assessment Report has included measures to avoid, prevent and reduce identified effects and also offset certain significant effects. It has also identified where it may be appropriate for further monitoring to be undertaken.
25. The EIA Regulations also impose duties upon the Scottish Ministers in the context of their decision making. The Ministers have to assess whether the information that has been provided is adequate and if necessary request further information. In terms of decision making, Regulation 21 sets out an extensive list of matters which the Scottish Ministers have to undertake during the decision making process. The list includes reference to the obligations of the Scottish Ministers in terms of Regulation 4 to examine the information (Regulation 4(1)(c)) and also to reach a reasoned conclusion on the significant effects of the proposed Development on the environment (Regulation 4(1)(d)).
26. The Environmental Impact Report demonstrates SPR’s compliance with the requirements both set out in Schedule 9 and also in terms of the EIA Regulations.
27. In terms of determinations under Section 36, there are no specific statutory presumptions that apply. As identified above, there are considerations which have to be taken into account and dealt with both in terms of Schedule 9 and under the EIA Regulations. In that context, Section 36 decision making incorporates consideration of a wide policy framework which will include elements of National Energy Policy, National Planning Policy and Guidance and also the

Local Development Plan and other Guidance. All these matters are material and should be taken into account in the decision making process. The ultimate weight of any particular factor in the decision making process is a matter for the decision maker.

### 1.3 The Applicant

28. Sheirdrim Renewable Energy Development is being proposed by ScottishPower Renewables (UK) Ltd (SPR).
29. ScottishPower Renewables 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 £4m every working day in 2019 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.
30. ScottishPower Renewables 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 as part of an international pipeline of projects across Europe and the USA.
31. With over 40 operational windfarms, SPR manages all its sites through its world leading Control Centre at Whitelee Windfarm, near Glasgow.



## 2 The Development

### 2.1 The Site

32. The selected Site is part of the Achaglass and Gartnagrenach Estates and is located at the northern end of the Kintyre Peninsula, wholly within the Argyll and Bute Council administrative area, near the villages of Clachan and Whitehouse. The Site itself is centred on NGR 181302, 657098 and its location is shown on **Figure 1**.
33. The Site forms part of a ridgeline of relatively remote upland plateau, on the northern Kintyre peninsula, comprising widespread coniferous plantation and some areas of open moorland. The Site is characterised by upland moorland/wet grassland within the eastern and south eastern extent of the Site, with commercial plantation forestry in the western extent of the Site, including Sheirdrim Hill. As the Site is partly a commercial forest, there are existing borrow pits and a series of forestry access tracks, including a main access haul track leading off the A83 on the northern side of the Site.
34. The Site extends from the A83 in the north to the Larachmor Burn in the south, with a network of inland lochs and smaller watercourses contained within the application boundary. There are two lochs within the Site (Loch Chorra-riabhaich and Loch Lurach) and several others in the immediate vicinity. Other large hills to the south include Cnoc Creagach (215 m AOD), Cnoc an t-Seallaidh Bhig (248 m AOD) Cruach Achaidh Ghlais (244 m AOD) and Cruach Tamalabh (242 m AOD). Topography generally rises to the south from circa 70 m AOD at the Site entrance, to circa 270 m AOD in the south east, particularly around Cruach nam Fiadh.
35. Access to the Site is via the A83 which runs past the northern and western ends of the Site. The B842 runs along the eastern side of the peninsula between Campbeltown and Cloanaig and the B8001 which runs north east to Kennacraig from Cloanaig. National Cycle Route (NCN) 78 also follows the B842 and the B8001. The Kintyre Way passes directly adjacent to the south of the Site. These B roads and the Kintyre Way will not be used by any construction vehicles.

### 2.2 Surrounding Area

36. The immediate area surrounding the Site is rural in nature with land predominantly used for commercial forestry purposes and rural agriculture. The operational Freasdaill Windfarm is located directly adjacent to the Site to the north east and the consented Eascairt Windfarm is located directly to the south east of the Site. The closest sizeable settlement is Tarbert, approximately 11 km north east of the Site, although there are smaller settlements nearby, including the villages of Clachan (approximately 2.5 km west of the nearest wind turbine), and Whitehouse (approximately 2.3 km north east of the nearest wind turbine). The immediate vicinity has relatively low population density, although there are a number of individual properties directly adjacent to the north and west.
37. The closest landscape designations outwith the Site are the Knapdale /Melfort and West Kintyre (Coast) Areas of Panoramic Quality (APQs), approximately 3 km and 2.5 km to the north west and west. Further to the east, the North Arran National Scenic Area (NSA) and Wild Land Area (WLA) also fall within the study area. Tarbert Woods is the closest natural heritage designation and is a Special Area of Conservation (SAC)/Site of Special Scientific Interest (SSSI). There are no listed buildings or scheduled monuments within the Site.
38. There are five ecologically designated sites located within 5 km of the proposed Development which are as follows:
- Ardpatrik and Dunmore Woods Site of Special Scientific Interest (SSSI) – 1.6 km from Site;
  - Tarbert Woods Special Area of Conservation (SAC) – 1.7 km from Site;
  - Claonaig Wood SSSI – 2.2 km from Site;
  - Inner Hebrides and the Minches SAC – 3.7 km from Site; and
  - Kintyre Goose Roosts Special Protection Area (SPA)/Ramsar/SSSI – 5 km to its closest point.

### 2.3 Description of the Proposed Development

39. The proposed Development is a Renewable Energy Development that intends to make the best use of available renewable energy technologies to maximise and optimise the renewable energy potential of the Site. For this consent application, SPR intend to construct a blend of renewable energy technologies, including 19 three-bladed horizontal

axis wind turbines, 16 up to 149.9 m tip height and 3 up to 135 m tip height, with a combined rated output in the region of around 114 megawatts (MW) and around 20 MW of ground mounted solar arrays producing a combined output of around 134 MW or 360 to 380 GWh of electricity annually. This equates to the annual power consumed by approximately 99,200 average UK households. Around 38 MW of battery storage would also be installed to store energy and so provide flexible balance of energy and the delivery of the full potential of renewable energy to meet the demands of the national grid.

40. The proposed Development would re-use and share existing infrastructure from the existing onsite forestry operations and Cour Windfarm access tracks where possible. This includes sharing much of the timber haul route as an access track, thus maximising efficiency and reducing the cost to the consumer.

### 2.3.1 Proposed Infrastructure

41. Careful consideration has been given to the layout of the proposed Development, which is demonstrated in the design evolution of the scheme, this is set out in the EIA Report **Chapter 2 Site Description and Design Evolution** and the Design and Access Statement (DAS). The layout for the proposed Development is described in detail in **Chapter 3 Proposed Development** of the EIA Report and is shown on **Figure 4** of this Planning Statement. Additional details on construction methods are provided in the outline Construction and Environmental Management Plan (CEMP) included in EIA Report **Technical Appendix 3.1**. Where realistically possible, existing infrastructure, in particular the access tracks and construction areas, have been utilised.
42. The design process described in the EIA Report **Chapter 2 Site Description and Design Evolution** and the DAS sets out why the proposed Development in this form presents the best possible balance between turbine productivity and environmental effects. It is considered to be the most productive array and would contribute significantly to Scottish Government targets for renewable energy production.
43. Each Chapter of the EIA Report takes an appropriate and topic specific approach to assessment of the proposed Development within the parameters identified. The EIA Report provides a worst-case assessment for each discipline and presents enough information for consultees and the decision makers to comment on and determine the application within the parameters of the proposed Development.
44. The proposed Development includes associated infrastructure including:
- 19 wind turbines;
  - ground mounted solar arrays;
  - battery storage units;
  - crane hardstandings for wind turbine installation;
  - transformer/switchgear housings located adjacent to turbines & solar arrays;
  - new and upgraded access tracks including watercourse crossings where necessary, passing places and turning heads;
  - two access points off the A83;
  - underground electrical cabling;
  - compound containing substation, control building and battery storage;
  - one site construction and maintenance compound;
  - up to two temporary Power Performance Masts;
  - health & safety and other directional site signage;
  - search areas for up to five borrow pits;
  - recreational access paths providing access to the site from the Kintyre Way;
  - walker's shelter close to the Kintyre Way;
  - signage and access to archaeological features adjacent to the site; and
  - bird watchers hide and habitat improvements, including broadleaf tree planting and the re-wetting of peat areas previously drained.
45. The proposed Development would also require forest restructuring works to enable construction and operation of the renewable energy development.

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46. The layout for the proposed Development is presented in **Figure 4** of this Planning Statement. Typical details for the proposed infrastructure are shown on EIA Report **Figures 3.2-3.14**.
47. It is proposed that the wind turbine components would be delivered to Campbeltown Harbour. A preliminary Route Survey assessment has determined that, based on the wind turbine components considered, transport loads would follow a predetermined route which turns right on Hall Street from the quayside before following Kinloch Road. Transport loads would then turn left onto Aquilibrium Avenue then continue onto the A83. The abnormal loads would then continue north on the A83 before reaching the site access junction. The turbine transport loads would be moved from the port of entry (Campbeltown) to the Site under police escort.
48. It is expected that wind turbine towers would be sourced from the CS Wind UK manufacturing factory in Machrihanish, transport loads would depart the factory and turn right before continuing east/north east to the junction with the A83. These loads would then travel north on the A83 until they reached the site access junction, also under police escort.
49. For other technologies that would be installed on site, it is likely that they would be delivered using standard articulated lorries utilising the road network between Glasgow and Kintyre.
50. Two access points are currently included in the proposed Development. The first of these is an existing access at Glebe cottage and the second is a new access 180 m south of Glebe cottage. This new access is the preferred access as deliveries to the Site would be directed away from the cottage avoiding any disturbance and visual intrusion for the residents of the cottage, it would also provide a better alignment for the delivery of the larger components to enter the Site.
51. Transport Scotland has been consulted on the use of the new access point and have informally advised that it is a viable option. However, in the absence of agreement from A&BC and formal agreement with Transport Scotland, who have verbally agreed to the design of the new access, both accesses are included in the proposed Development and assessed in this EIA Report. **Figure 4** illustrates the location of the access points and EIA Report **Figure 3.12** and **Figure 3.13** illustrate the design of the access points, both of which require works to create an access point suitable for the delivery of turbines to the Site. Should the new access be approved, SPR would not undertake the upgrade improvements needed at Glebe cottage preferring instead to create the new access illustrated in EIA Report **Figure 3.12**. It is anticipated that this would be controlled by way of a condition should consent be forth coming.
52. The grid connection may require consent under Section 37 of the Electricity Act 1989 which is the subject of a separate consenting process to this Section 36 application. The grid connection application would be made Scottish Hydro Electric Transmission plc who are the network owner in the area of the proposed Development and who will own assets beyond the Site substation. The precise route of the grid connection has not yet been determined and the assessment of its effects are not identifiable because it has yet to be designed and applied for.
53. It is anticipated that there would be no limit to the lifetime of the proposed Development.
54. The proposed Development would result in reduced carbon emissions, The EIA Report carbon calculations spreadsheet is provided in **Technical Appendix 15.1**. A summary of the anticipated carbon emissions and carbon payback of the proposed Development are provided in **Table 2.1**.

RESULTS	Exp.	Min.	Max.
Net emissions of carbon dioxide (t CO <sub>2</sub> eq.)	265201	247485	285078
<b>Carbon payback time</b>			
Coal-fired electricity generation (years)	0.8	0.7	0.9
Grid-mix of electricity generation (years)	2.9	2.5	3.4
Fossil fuel - mix of electricity generation (years)	1.6	1.4	1.9
Ratio of soil carbon loss to gain by restoration (TARGET ratio (Natural Resources Wales) < 1.0)	64.4	54.9	68.7
Ratio of CO <sub>2</sub> eq. emissions to power generation (g / kWh) (TARGET ratio by 2030 (electricity generation) < 50 g /kWh)	19	19	18

Table 2.1: Anticipated carbon emissions

### 2.3.2 Mitigation, Compensation and Enhancement Measures Assumed to Form a Part of the Proposed Development

55. The EIA Report assumes certain measures form an inherent part of the proposed Development and as such, in effect form a part of the proposals and would be carried out as a matter of course (notwithstanding consultees may request such measures be tied to the grant of any consent by planning condition).

56. Structures of 150 m or taller require to be lit with visible aviation lighting in accordance with Article 222 of the UK Air Navigation Order (ANO) 2016. In the case of wind turbines the lights are usually mounted on the nacelle of the wind turbines and, at least three (to provide 360 degree coverage) low-intensity (32 candela) red lights at an intermediate level of half the nacelle height on the tower. In response to concerns with respect of turbine lighting and landscape sensitivity the tip height of the proposed Development has deliberately been limited to below 150 m so that such lighting is not required.

#### Local Access and Recreation Improvements

57. SPR is proposing to enhance several aspects of the site by improving local access and recreation opportunities. The enhancements being proposed are as follows:

- access tracks for users of the Kintyre Way to enter the site with signage for a circular walk which would take visitors to a viewing point upon Cruach nam Fiadh. Stone seating, using locally cut rock from the Site borrow pits, would also be placed at various locations around the Site;
- shelter for walkers close to the entrance to the Site from the Kintyre Way;
- access and information boards to several archaeological features near to the Kintyre Way, which will provide a description of the features and some interesting archaeological context for the Site and the surrounding area. Further details are provided in the following text and in **Chapter 11 Archaeology and Cultural Heritage**; and
- bird hide, located north west of Lochan Fraoich, and accessible from the Kintyre Way for viewing bird species found within the south western part of the Site.

58. The proposed Development would provide information boards at several archaeological features identified on Site. These would comprise information boards for two Sheiling huts located just south of the Kintyre Way between T18 and T19, where there is evidence of a stream diversion and an enclosure, and at the site of a Longhouse (domestic building, byre and enclosure) situated west of the Kintyre Way between T16 and T19. These features are described in more detail in the EIA Report at **Chapter 11 Archaeology and Cultural Heritage**. The information boards would provide some background information on the features and graphics illustrating what the features may have looked like when in use.

#### Habitat Management Plan

59. As part of the proposed Development, SPR would implement habitat improvement proposals following the identification of opportunities to improve certain parts of the Site. Much of the Site comprises peat, which when

undrained provides high quality and important habitats. However, much of the site has been drained for agriculture and forestry. This drainage affects the peat leading to it drying out and also the introduction of poorer quality habitats. SPR and the EIA team have worked together to identify an area in the southern part of the site adjacent to Loch Chorra-riabhaich and the Kintyre Way. This area is 84 ha and compensates for 41 ha of peat that would be affected by the proposed Development. It is planned to undertake a number of measures in the habitat improvement area, including the damming of ditches using in-situ peat with the aim of raising the water table to rewet surrounding areas of peat and to re-establish peat forming species, such as sphagnum. Details of the habitat management proposals are described in a Habitat Management Plan (HMP) which is provided in **Technical Appendix 8.5** of the EIA Report.

#### CEMP

60. An Outline CEMP, at **Technical Appendix 3.1** of the EIA Report, sets out the principles and procedures for environmental management during construction of the proposed Development. Should consent be granted for the proposed Development, a site specific CEMP would be prepared based on the principles of the Outline CEMP. The content of the CEMP would be agreed with Argyll and Bute Council (A&BC), in consultation with relevant consultees through consultation and enforced via a planning condition. The CEMP would be used by the Contractor to ensure appropriate environmental management is implemented throughout the construction phase of the proposed Development including:

- setting out roles and responsibilities for environmental measures;
- phasing of the proposed Development;
- good practice measures;
- pollution prevention measures;
- drainage and surface water management;
- water quality monitoring; and
- other pre-construction surveys.

61. The CEMP would be prepared to take account of Good Practice during Windfarm Construction (SNH 2015), Guidelines for Onshore and Offshore Windfarms (2010) and provides the construction activities methodology pertinent to the EIA, or any update to these documents.

62. SPR would engage an ECoW onsite during the construction phase. The services of other specialist advisors would be retained as appropriate, such as an Archaeological Advisor, to be called on as required to advise on specific environmental issues. The Principal Contractor (PC) would ensure construction activities are carried out in accordance with the mitigation measures outlined in the EIA Report and any planning conditions, and this would be monitored by SPR and the ECoW.

#### CTMP

63. Prior to the commencement of development, a detailed Construction Traffic Management Plan (CTMP) would be agreed with Police Scotland, Argyll and Bute Council and Transport Scotland. An Outline CTMP is provided in **Technical Appendix 12.2** of the EIA Report. This would include a number of measures to reduce the effects of the construction of the proposed Development on local receptors and communities, including the effects from turbine deliveries (abnormal loads). This would include the Transport Route Assessment, details of any required temporary widening and other road improvement measures, together with detailed consideration of vehicle swept paths, loadings, structural assessments (where required), temporary street furniture removal details, dust and dirt management and community engagement. An element of preparation of the CTMP would be a trial run, which would be undertaken through a special licence, with the Roads Authorities and Police Scotland in attendance. It would also include the requirement to carefully consider the way in which the site entrance is managed. The CTMP would require that a Traffic Control system is implemented which would include the following:

- All on site deliveries and collections would be co-ordinated through the Site Management Team and movements on to and off of site would be tracked by the Site Security Team;
- Drivers would be issued with and required to carry induction cards with a unique number to identify them that would be reviewed if any site protocols are breached; and
- Where possible, no daytime or overnight parking of site or construction vehicles (site employees or visitors) outside of any predetermined construction compounds or work sites would be allowed.

### Forestry

64. As a result of the construction of the proposed Development, there would be a net loss of commercial forestry. The proposed Development would require commercial woodland to be felled in order to facilitate the proposed Development. A total of 26.03 hectares of felling would be advanced from the baseline Forest Design Plan as a result of the proposed Development to facilitate the operation of a number of wind turbines. No additional forestry removal to that already planned on the Site is needed for the solar areas. As a result of the proposed Development, there would be a net loss of 50.02 woodland development area. Further details are provided in EIA Report at **Technical Appendix 3.2**.

65. In order to comply with the criteria of the Scottish Government's Control of Woodland Removal Policy, compensation planting would be required. The Applicant is committed to providing appropriate compensatory planting on or off-site. The extent, location and composition of such planting to be agreed with Scottish Forestry, taking into account any revision to the felling and restocking plans prior to the commencement of operation of the proposed Development. It is anticipated that this would be the subject of a planning condition should consent be forthcoming.

### Proposed Community Shared Ownership

66. SPR is working with local communities throughout Scotland and is committed to offering a package of community measures to local communities. SPR is committed to offering a package of community benefits to local communities that could include the opportunity to invest in the operational development. SPR would discuss with local stakeholders which communities would be the appropriate 'Community Organisations' to participate. SPR has already shared initial information with the community about an opportunity to invest and will provide an introductory leaflet which outlines a potential investment structure at a later date. The criteria to define the appropriate Community Organisation comes from the community right to buy under Land Reform legislation.

67. The Onshore Wind Policy Statement (OWPS 2017), see **Appendix 2** of this Planning Statement, is supportive of community shared ownership. The OWPS advises that the Scottish Government's ambition is to see a significant increase in shared ownership of renewable energy projects in Scotland which would put energy into the hands of local communities and delivering a lasting economic asset to communities across Scotland. The document is clear that *"All stakeholders stand to benefit from this goal being achieved, and from the greater partnership working that it can engender across a range of renewables developments."*

68. The OWPS advises that the governments *"ambition remains to ensure that, by 2020, at least half of newly consented renewable energy projects will have an element of shared ownership."* It also advises that *"Shared ownership will play a key part in helping to meet our targets of 1GW of community and locally owned energy by 2020 and 2 GW by 2030. We expect community involvement in onshore wind developments to continue to play a vital roll in reaching these targets."*

69. Further information setting out the potential benefits of this is provided at 3.5.1 of this Planning Statement.

### Proposed Community Benefit

70. In addition to the shared ownership opportunity, should the proposed Development gain consent, a Community Benefit Fund would be made available. SPR is committed to offering a package of community benefits to local communities.

71. SPR would discuss with local stakeholders to identify which communities would be the appropriate 'Community Organisations' to participate in these benefits. SPR would keep local communities informed about these benefits as the project progresses and, in line with Scottish Government guidance, would provide information in a timely manner so the communities are able to fully assess the opportunity.

72. SPR is committed to keeping local communities informed as the project progresses and, in line with Scottish Government guidance, would provide information in a timely manner so the communities are able to fully assess the opportunity.

73. It is expected that any proposed income streams from these community benefits could be used to support community projects within the local area. Local communities would have the flexibility to be able to choose how the money is spent and prioritise it for the things which matter most to them. The host community of West Kintyre Community

Council has developed a Community Action Plan for 2017-2023<sup>1</sup> which gives an indication as to the type of initiatives that might be considered important within the West Kintyre Community Council area, including the following:

- creation of all ability tracks & paths, development of the Kintyre Way and development of recreational facilities at Tayinloan playing fields;
- improved broadband and mobile phone services;
- provision of community bus service;
- supporting creation of small businesses and providing bursaries for further training;
- purchase and conversion of unused buildings for community and small business use; and
- improved promotion of West Kintyre as a place to live, work and raise a family.

74. To date, SPR has voluntarily awarded over £1.6 million in community benefit funding to communities in Argyll and Bute. A wide range of local projects and community initiatives have been supported by the funds including:

- 174 community facilities and services projects totalling £339,025.60;
- 47 community or local event projects totalling £39,089.33;
- 16 environmental projects totalling £30,224.45;
- 11 heritage projects totalling £11,036;
- 26 skills and employment projects totalling £26,344.48;
- 73 sport and recreation projects totalling £79,290.17; and
- 129 youth and education projects totalling £102,981.21.

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<sup>1</sup> West Kintyre Community Council: Community Action Plan 2017-2013



## 3 Benefits of the Development

### 3.1 Renewable Electricity Generation

75. The Scottish and UK Governments are committed to the long-term decarbonisation of electricity generation and the Scottish Government declared a climate emergency in May 2019. SPR is aligned with the Scottish Governments commitment by generating 100% renewable energy. The Climate Change Bill 2018 recently passed by the Scottish Government amends the Climate Change Act 2009 by setting legally binding targets of net-zero greenhouse gas emissions by 2045 at the latest, with Scotland becoming carbon neutral by 2040. Scotland will not only have to meet the net-zero target for 2045, but also have to reduce emissions by 56% by 2020, 70% by 2030 and 90% by 2040. These are currently the most ambitious statutory targets in the world.
76. These targets remain challenging –however if consented the proposed Development would make an important contribution to Scotland’s Climate Change Plan to become carbon neutral by 2040 and reduce emissions.
77. The proposed wind turbines would have a combined rated output in the region of around 114 MW and around 20 MW of ground mounted solar arrays producing a combined output of around 134 MW or between 360 and 380 GWh of electricity annually. This equates to the annual power consumed by approximately 99,200 average UK households. The proposed Development includes around 38 MW of battery storage which would store energy allowing the flexibility to balance of energy output to meet the demands of the national grid.

### 3.2 Capital Expenditure Associated with the Development

78. **Chapter 14 Socio-economics, Recreation and Tourism**, of the EIA Report advises that it is anticipated that the proposed Development construction costs could total approximately £148 million, including turbines, solar arrays, civil engineering works, electrical plant and grid connection. It is expected that construction phase expenditure of the proposed Development approximately £21.5 million (approximately 16.1% of the overall total) would be spent in the WSA. An estimated £43.4 million (32.6% of the overall total) would be expected to be spent in Scotland as a whole.
79. The Scottish economy would be expected to be boosted by a total of £49.1 million (assuming that the turbines are procured in Campbeltown) million of net GVA during the construction period. During the operational phase, based on a nominal 40 year period, the proposed Development would contribute some £60.4 million in GVA to the local economy through direct, indirect and multiplier effects, and over £170 million GVA to the economy of Scotland as a whole. This is considered to be a positive benefit of the proposed Development.

### 3.3 Employment Opportunities

#### 3.3.1 Construction

80. During the 22 months’ construction phase, the proposed Development is expected to support, in net terms, 268 FTE jobs during the wider construction phase which has the potential to be beneficial for local residents. Information from other projects developed by SPR indicates that a wide selection of supply chain businesses could expect to benefit from the investment in the local and Scottish economy, including haulage, aggregates supply, forestry services, building services, fencing, and security. SPR is committed to employing good practice measures with regard to maximising local procurement which is evident from the procurement of towers from CS Wind, Campbeltown for the construction of Beinn an Tuirc 3 Windfarm

#### 3.3.2 Operation

81. During the operational phase, the proposed Development is expected to require between 3 and 5 new full time employees (engineers and technicians) locally and further posts would be created elsewhere in Scotland. Additional benefits would accrue to the local supply chain as a result of services supplied to the operation of the proposed Development.

### 3.4 Community Benefit and Investment

82. SPR is committed to offering a package of community benefits to local communities that could include not only the opportunity for community benefit, but also for local communities to invest directly in the operational proposed Development. Further information on the way in which this would be done is provided in **Chapter 2** of this Planning Statement.



83. It is expected that any proposed income streams from these community benefit payments and profit from investment in the proposed Development could be used to support community projects within the local area. Local communities would have the flexibility to choose how the money is spent and prioritise it for the things which matter most to them.
84. To date, SPR's operational windfarms have contributed more than £29 million of support towards community initiatives across the UK, with their existing local windfarms (Cruach Mhor, Clachan Flats and Beinn an Tuirc) contributing over £1.6 million of support to Argyll and Bute communities. A wide range of local projects and community initiatives have been supported by the funds including:
- 174 community facilities and services projects totalling £339,025.60;
  - 47 community or local event projects totalling £39,089.33;
  - 16 environmental projects totalling £30,224.45;
  - 11 heritage projects totalling £11,036;
  - 26 skills and employment projects totalling £26,344.48;
  - 73 sport and recreation projects totalling £79,290.17; and
  - 129 youth and education projects totalling £102,981.21.

### 3.5 Carbon Savings

85. During operation, the proposed Development would contribute to a beneficial effect on local and global air quality, by avoiding emissions due to the generation of electricity by burning fossil fuels. A carbon assessment has been undertaken to estimate the potential savings in carbon dioxide (CO<sub>2</sub>) emissions by the proposed Development replacing other electricity sources. The proposed Development has a payback time of approximately 1.6 years and displacement of around 265,201 tonnes of CO<sub>2</sub> per year over a fossil fuel mix of electricity (10.6 million tonnes assuming a 40 year lifetime for the purposes of the carbon calculator). This would positively contribute to meeting Scotland's targets for reducing greenhouse gas emissions.

### 3.6 Public Access and Outdoor Recreation

86. A range of site enhancements are incorporated into the plans to enhance the recreation value of the Site, by providing access from the nearby Kintyre Way into the proposed Development giving access to a bird hide, a walker's shelter, stone seating, archaeological features with information boards and a viewing point upon the Site's highest point. Further information on what is proposed is provided in **Chapter 2** of this Planning Statement.

### 3.7 Non-domestic Rates

87. It is expected that the proposed Development would have to contribute over £2 million in non-domestic business rates per annum which would benefit the public sector.

## 4 Planning and Renewable Energy Assessment

### 4.1 Introduction

88. As set out in **Chapter 1** of this Planning Statement, given the proposed Development would exceed 50 MW in generating capacity it must be considered under S36 of the Electricity Act 1989. The Act contains a number of requirements which decision makers can use as a guide as part of the process to determine whether to grant consent for the proposed Development or not. In summary, the requirement is to consider what effects the proposed Development would have on a range of environmental matters and to what extent has the applicant sought to mitigate any such effects. It is not a test that has to be passed or can be failed. The wording is clear that the developer shall have regard to the desirability of preserving a number of features and reasonably do what they can to mitigate effects on the features. The decision maker is required to have regard to the desirability of the features and the extent to which the developer has sought to mitigate effects.

89. The proposed Development has thoroughly assessed the matters which are raised in Schedule 9 and has, where appropriate, identified significant effects and reasonable mitigation of those effects. The EIA has considered matters which are not covered by Schedule 9 as well as those which are covered. It is submitted that the requirement to have regard to the preservation of matters stated in Schedule 9 has been met and that the requirement to reasonably mitigate effects has also been met through the EIA process.

90. The S36 approach to determination is set in the context of legislation which seeks to support electricity developments which might be considered to be nationally important (i.e. in excess of 50 MW). In the decision making process it is, therefore, material to consider the extent to which the proposed Development may contribute to national policy both in terms of energy and planning. Against that background, the Planning Statement seeks to identify the relevant provisions of Energy Policy, National Planning and Development Plan Policy.

91. The statutory presumption in relation to the Local Development Plan is not triggered in Section 36 applications (see **Appendix 1** of this Planning Statement). The entirety of policy is relevant, and material and it is a matter of attributing weight and balancing the benefits against the environmental disbenefits.

92. This Chapter of the Planning Statement sets out and provides the renewable energy policy which sets the context for the framework in which the proposed Development is being brought forward. It then considers the way in which the proposed Development could assist in meeting the relevant Government targets for renewable energy. It then goes on to consider the relevant Scottish planning policy contained in the National Planning Framework 3 (NPF) and Scottish Planning Policy (SPP). This Chapter then considers the relevant Development Plan policy. Finally, this Chapter considers the balance of the issues which have been considered.

### 4.2 Climate Change and Renewable Energy Policy

93. **Appendix 2** of this planning Statement sets out the International, UK and Scottish policy framework for the proposed Development. The key policies for the consideration of the application for the proposed Development are considered to be The Climate Change Plan, the Scottish Energy Strategy 2017, The Scottish Onshore Wind Energy Policy Statement 2017 and The Electricity Generation Policy Statement together with the latest climate change targets. The following text sets out the current Scottish Government Energy Policy, the current Scottish targets and the progress towards those targets.

#### 4.2.1 Current Scottish Government Energy Policy

94. In December 2017 the Scottish Government published two energy policy documents, comprising the following:

- the Scottish Energy Strategy 'The Future of Energy in Scotland'; and
- the OWPS.

95. Together, these policy documents represent the Scottish Government's intended energy and climate change strategy for the period to 2050. Further information in respect of these documents is contained in the following text.

### Scottish Energy Strategy 2017

96. The Scottish Government published its Scottish Energy Strategy (SES 2017) in December 2017. The SES 2017 sets out a vision for a strong and sustainable low carbon economy. SES 2017 describes the Scottish Government's vision for the future energy system in Scotland beyond 2020 looking forward until 2050.
97. The SES is designed to provide a long term vision to guide detailed energy policy decisions over the coming decades. It sets out the priorities for an integrated system-wide approach that considers both the use and the supply of energy for heat, power and transport. It contains six energy priorities including increasing renewable energy production and increasing flexibility, efficiency and resilience of the energy system.
98. The main document was published alongside the OWPS. This document provides focus for onshore wind.
99. The SES 2017 advises that for Scotland to meet the domestic and international climate change targets, the Government will set a new 2030 'all-energy' target for the equivalent of 50 % of Scotland's heat, transport and electricity consumption to be supplied from renewable sources. It advises that it has a vision for:
- "a flourishing, competitive local and national energy sector, delivering secure, affordable, clean energy for Scotland's households, communities and businesses."*
100. The SES 2017 sets two new targets for the Scottish energy system by 2030. These are:
- *"The equivalent of 50% of the energy for Scotland's heat, transport and electricity consumption to be supplied from renewable sources; and*
  - *An increase by 30% in the productivity of energy use across the Scottish economy."*
101. Reaching 50 % in the 13 years from the publication of the SES 2017 will be challenging, despite the good progress being made with the equivalent of 17.8% being met by renewable sources in 2015, and the SES 2017 acknowledges this.
102. Renewable and low carbon solutions are identified as one of six energy priorities around which the 2050 vision is built. The document advises that the Scottish Government *"will continue to champion and explore the potential of Scotland's huge renewable energy resource, and its ability to meet our local and national heat, transport and electricity."*
103. The SES 2017 advises that *"changes to how we store energy across the system, and particularly in terms of electricity and heat, could have a profoundly important bearing on our low carbon future."* The proposed Development includes the provision of battery storage which is considered to be a benefit of the proposed Development.
104. Under the heading of Renewable Energy SES 2017 is clear that the Scottish long term climate change targets will require the near complete decarbonisation *"of the Scottish energy system by 2050 and that renewable energy is anticipated to meet a significant share of this"*.
105. The SES considers solar and advises that *"solar PV can make an important contribution to Scotland energy needs."* It advises that there is the potential to power the equivalent of 50,000 homes through solar power. The SES is clear that there is the potential for the combination of storage with wind and solar assets to be a valuable solution for the energy system as a whole, as it would offer the potential for demand to be locally managed.
106. In the section on Onshore Wind, SES 2017 advises that "onshore wind is now amongst the lowest cost forms of power generation of any kind, and is a vital component of the huge industrial opportunity that renewables create for Scotland". Onshore wind is identified as being required to play a vital role in the future of Scotland, helping to decarbonise electricity, boosting the economy and meeting demand. The SES 2017 notes that in order to achieve the targets it means developers and communities working together and striking the right balance between environmental impacts, local support, benefit and where possible economic benefits deriving from community ownership.

### Onshore Wind Policy Statement

107. The Onshore Wind Policy Statement (OWPS 2017) reaffirms the existing Scottish Government's onshore wind policy set out in previous publications. The Ministerial Foreword is clear that there is no question that onshore wind has played a dominant and hugely successful role in contributing to the targets. It notes that onshore wind plays a valuable role in the empowerment and reward of local communities which are located near developments. The document focuses on the need to support development in the right places including, where acceptable, the inclusion or larger turbines, with effects and impacts of proposed developments being considered on their merits. The need to strike the right balance between environmental effects and impacts, local support and economic benefits is highlighted. It includes separate sections on the following key priority areas:

- route to market;
- repowering;
- a strategic approach to development;
- barriers to deployment;
- protection for residents and the environment;
- community benefits; and
- shared ownership.

108. The section on Route to Market makes is clear that the Scottish Government expect *"onshore wind to remain at the heart of a clean, reliable and low carbon energy future in Scotland."* Onshore wind is to remain *"crucial in terms of meeting the goals for a decarbonised energy system."* The Scottish Government is clear that the approach taken in the OWPS 2017 means that *"Scotland will continue to need more onshore wind development and capacity, in locations across landscapes where it can be accommodated."*

109. The OWPS 2017 is clear that the Scottish Government believe that *"new onshore wind projects can and must be developed with no additional subsidy cost to consumers."* The OWPS invites *"applicants to explain clearly how environmental impacts have been balanced against energy yield during design iteration, and reported as part of the information provided in support of applications."*

110. **Chapter 2 Site Description and Design Evolution**, of the EIA Report sets out the design evolution process and sets out the expected yield associated with the turbines for the proposed Development.

111. The OWPS is clear that innovative solutions such as the integration of energy storage within onshore windfarm proposals not only help improve the ability of variable generators, such as onshore wind, to manage generation and demand but can also help grow the supply chain. The OWPS (2017) states: continuing support for innovation – for example, the development of smarter networks, active management and storage technology – can have a positive effect on the integration and economics of onshore wind generation. Innovation in the onshore wind sector can help the Scottish supply chain to grow, creating jobs and opportunities, and securing Scotland's position as a hub for innovation and investment.

112. In the Chapter on Community Benefits the OWPS 2017 advises that *"As of November 2017 over £12 million [in community benefit payments] has been paid out over the preceding 12 month period"*. The community benefit being offered by the proposed Development is set out in **Section 2.3** of this Planning Statement and is considered to be a valuable contribution to the community.

113. The OWPS 2017 is clear that the Scottish Government is keen to see a significant increase in shared ownership of renewable energy projects delivering long lasting economic assets to communities across the country.

114. The progress to the renewable energy targets is considered to be an important material consideration.

### Climate Change Plan, The Third Report on Proposals and Policies 2018-2032

115. The Scottish Government published the Climate Change Plan, The Third Report on Proposals and Policies 2018-2032 (CCP 2018) in February 2018 which sets out Scotland's decarbonisation plans to 2032. The Executive Summary advises that the CCP 2018 sets out how Scotland can deliver its target of 66 % emissions reductions, relative to the baseline for the period 2018-2032.

### The Climate Emergency

116. In May 2019 the Scottish Government declared a climate emergency. At the same time in Westminster the Environment Secretary acknowledged a climate change emergency.

117. In a speech to the Scottish Parliament, the Climate Change secretary stated:

*“The Climate Change Committee has been stark in saying that the proposed new targets will require “a fundamental change from the current piecemeal approach that focuses on specific actions in some sectors to an explicitly economy wide approach”. To deliver the transformational change that is required, we need structural changes across the board: to our planning, procurement, and financial policies, processes and assessments. And as I’ve already said, that is exactly what we will do.”*

118. She went onto say that:

*“subject to the passage of the Planning Bill at stage 3, the next National Planning Framework and review of the Scottish Planning Policy will include considerable focus on how the planning system can support our climate change goals.”*

119. National Planning Policy in the form of NPF3 and SPP also recognise the benefits which renewable energy developments can bring. NPF3 support Governments energy policy initiatives through the land use planning system. SPP seeks to ensure Development Plan policy for renewable energy developments takes a balanced approach, encouraging the right development in the right place. To this end it sets out a formula for local authorities to create a ‘spatial framework’ within their development plans which sets out areas which might be considered suitable for onshore wind development based on a range of identified criteria. It encourages development which contributes to sustainable economic development. Details of relevant parts of the NPF3 and SPP can be found in **Section 4.3**. It should be noted that NPF3 and SPP were prepared prior to the publication of the current Scottish Government policy in the form of SES and the OWPS. It is anticipated that when NPF3 and SPP are updated they will reflect the drive for renewables contained in the SES and the OWPS 2017 in line with the Ministers comments on the climate change emergency.

### Scottish Climate Change Bill (2018)

120. The new Scottish Climate Change Bill (2018) was passed by the Scottish Parliament on 25 September 2019, which amends the Climate Change (Scotland) Act 2009, set a legally binding target of net-zero greenhouse gas emissions by 2045 at the latest, with Scotland becoming carbon neutral by 2040. Scotland will not only have to meet the net-zero target for 2045, but also to reduce emissions by 56% by 2020, 70% by 2030 and 90% by 2040. These are currently the most ambitious statutory targets in the world.

121. Furthermore, on the 26 September 2019, the day after the Scottish Parliament approved the Climate Change Bill, Argyll and Bute Council established the Argyll and Bute Environmental Action Group. The purpose of the Group will be to support the ongoing national and international response to climate challenges and seek opportunities for strategic projects and activities, to enhance Argyll and Bute’s contribution to addressing this global issue and delivering the Climate Change (Scotland) Act.’

### 4.2.2 Progress to the Scottish Renewable Energy & Electricity Targets

122. The Electricity Sector has been a focus for change in climate change policy and Governments have set increasingly ambitious targets for electricity generation by means which does not produce Carbon Dioxide (a recognised Greenhouse Gas). In Scotland, whilst the Electricity Sector is largely decarbonised, it is recognised going into the future that additional electricity generation capacity is required as ambitious targets to decarbonise the heat and transport sectors are set. These targets are set out in this Section of the Planning Statement. The targets that are set for renewable energy are described in **Appendix 2** of this Planning Statement. As it is acknowledged that the proposed Development would not be contributing energy to the national grid until after 2023, post 2020 targets are of more relevance to the proposed Development. **Table 4.1**. sets out the relevant targets.

Target	Current position
Overall renewable energy target – total Scottish energy consumption from renewables 50% by 2030	19.1% in 2017
Renewable Electricity Target – Gross electricity consumption from renewables 100% by 2020	76.3% in 2018

Table 4.1: Scottish Renewable Energy Targets

(Source Energy Statistics for Scotland Q2 2019 Figures)

123. The Scottish Government estimates that, in 2018, renewable sources generated the equivalent of approximately 74.6% gross electricity consumption. (Energy Statistics for Scotland Q4 (Scottish Government 2019)).
124. Chapter 1 of the Routemap for Renewable Energy in Scotland Update 2015 (see **Appendix 2** of this Planning Statement) states that the 2020 renewables target of 100 % equates to the equivalent of circa 16 GW of installed capacity. The most recent Renewable Electricity Planning Statistics for Scotland advise that as of September 2019, Scotland had in the region of 11.6 GW of installed renewable energy capacity the majority of which was wind generation projects. The total renewable energy capacity, by stage in Scotland was as follows:
- planning applications – 4.2 GW;
  - projects awaiting construction – 7.6GW;
  - projects under construction –1.2GW; and
  - operational projects – 11.6 GW.
125. The information provided shows that there is a significant shortfall against the Scottish 2020 renewable electricity generation target as the 'operational' and 'under construction' figures together equate to 12.8 GW of the required 16 GW. It is considered that many of the schemes which are awaiting construction are historic and are no longer viable and therefore will not be built. It can also be argued that some of the schemes which are in planning are no longer viable and will never be built, even if consented.
126. It is recognised that the targets which have been set by the Scottish Government are a target and not a cap, as set out in the letter from the Chief Planner to the Heads of Planning (2015). This letter advises that the Scottish Government target to generate at least 100 % of gross electricity consultation from renewables by 2020 does not place a cap on the support for renewable energy development, which includes onshore windfarms, should the target be reached.
127. It is considered that although the proposed Development would not be operational before 2020 it would make a valuable contribution to meeting any shortfall in the 2020 target. If post 2020 Scotland is starting from a point behind where Scotland is targeted to be, then there will be a clear need to increase capacity at greater speed. In this context the proposed Development would therefore make an important contribution to what is anticipated to be an unmet and uncapped target.
128. The international, UK and Scottish contexts set a framework of ambitious targets which should be met and exceeded if possible. It is considered that the international, UK and Scottish Renewable Energy Policy are all important considerations and should be afforded significant weight in the decision making process. This approach is supported by the Reporter in the case of Windy Edge Appeal Decision (Reference PPA-140-2055, June 2016) who stated that: *"It seems to me that there is no doubt that there is strong support in Scottish Government planning and energy policy for further renewable energy developments, including new commercial scale wind farms."*
129. In the case of Windy Edge (Reference PPA-140-2055, June 2016) the output of the proposed Development was 22.5 MW which the Reporter described as a modest but still important contribution towards the various targets set at the European, UK and Scottish level.
130. Since Windy Edge the Scottish Government has published the SES 2017 and the OWPS 2017. These documents are clear that there is an intensification of the need for renewable energy developments and in particular onshore windfarm developments. There is a clear need for new projects to come forward as quickly as possible to meet the



demand, it is accepted that this does not mean that all projects that come forward should be consented. This is interpretation has been supported in the case of Pencloe Windfarm 2018 (Reference WIN-140-4) where the Reporter stated:

*"I see no sign that the Scottish Government is slackening the pace; rather, the latest policy statements on energy and onshore wind indicate that the effort is being intensified. The latest target of generating 50% of energy from renewable sources by 2030 is a deliberately challenging one, which may require around 17GW of installed capacity by that date. The newly adopted Scottish Energy Strategy and the accompanying Onshore Wind Policy Statement are explicit that onshore wind will continue to play a vital role in that regard.*

*The Scottish Government's latest energy strategy expects onshore wind to help decarbonise Scotland's electricity, heat and transport systems, boost the economy, and meet demand.*

*I can only conclude that the Scottish Government remains firmly committed to the development of onshore wind energy, and that the relative success achieved so far in pursuit of renewable energy targets is not a persuasive argument against the future approval of new such schemes."*

131. The proposed Development would have an installed capacity of around 134 MW, which would make an important contribution to Scottish Government targets on renewable energy and carbon emission reductions. The announcement of new climate change targets in September 2019 has been made since the Pencloe decision and this further intensifies the clear need for renewable energy which is set out in a number of documents referred to by the Pencloe Reporter.
132. The proposed Development supports Scottish Government's desire to see substantial growth in renewables (including onshore wind) with reducing dependence on financial support mechanisms, as set out in the SES 2017 and OWPS 2017. This is a challenging set of policy objectives, but the proposed Development seeks to meet these objectives whilst also ensuring the proposed Development is acceptable in terms of environmental impact and residential amenity considerations. The impacts of the proposed Development are considered in the EIA Report and summarised in this Chapter 4 of Planning Statement. The proposed Developments contribution to targets and national policy objectives
133. It is expected that each wind turbine would have a rated capacity of around 6 megawatts (MW) giving a total installed capacity of around 114 MW. The wind turbines would produce around 340 - 360 GWh of electricity annually. The proposed solar development would also generate around 20 MW giving a total energy output for the proposed Development of around 134 MW or 360 - 380 GWh of electricity annually. This equates to the annual power consumed by approximately 99,200 average UK households<sup>2</sup> (which is more than the 41,630 homes in Argyll and Bute (based on National Records of Scotland 2018). Battery storage would also be installed on the Site and would have a storage capacity of around 38 MW. The energy capture estimated for the proposed Development is the result of the overall positive impact of accommodating larger rated capacity and the larger rotor (swept area) available at higher hub heights. The resultant improvement in the efficiency, economics and commerciality of the scheme would enable SPR to reduce the cost of energy from the proposed Development, giving a positive benefit to consumers in terms of electricity cost.
134. In recent years, the onshore wind industry has experienced the reduction in supply of smaller turbines across Europe due to lack of demand from mainland Europe, where the tendency is to install turbines at higher tip heights (e.g. 175 – 240m to blade tip). Therefore, it is highly unlikely that a range of smaller turbines (e.g. 120m) would be available at competitive prices by the time the proposed Development is ready to be constructed. Larger turbines need to be considered if onshore wind development is to continue to make a contribution to both the UK and Scottish Government's renewable energy targets.
135. Significant weight should be attached to the strong support of the Government for the development of renewable energy, and onshore wind energy as part of that. The proposed Development draws considerable support from the policy material discussed in this Chapter and **Appendix 2** of this Planning Statement. In particular it would make a

<sup>2</sup> Calculated using the most recent statistics from the Department of Business, Energy and Industrial Strategy (BEIS) showing that annual UK average domestic household consumption is 3,800 kWh (BEIS, 2019).

meaningful contribution towards targets for renewable energy and it is considered to be potentially commercially viable on a 'subsidy-free' price basis as a result of the proposed tip height. This would help to deliver new onshore wind and solar capacity required to help the Scottish Government meet its climate goals and provide low-carbon power that will keep consumer bills down. In the event that the 2020 targets are not achieved, the proposed Development would contribute significantly to making up the shortfall and help create the circumstances which make future targets more achievable. In the increasingly unlikely event that the 2020 targets are met then the proposed Development would contribute significantly to longer reaching targets.

### 4.3 National Planning Policy

#### 4.3.1 National Planning Framework (NPF 3)

136. The National Planning Framework (NPF3) was laid before the Scottish Parliament on 23 June 2014 and sets the context for development planning in Scotland. It is a long term strategy for Scotland and is considered to be an expression of the Government's economic strategy. It provides a framework for the spatial development of Scotland as a whole and includes 14 national developments identified which support the strategy. It is expected that the targets relating to renewable energy and the reduction of greenhouse gases which are stated in NPF3 will be updated and pushed out in the next version of NPF, following the lead given by the Energy Strategy.
137. The Town and Country Planning (Scotland) Act 1997 as amended by the Planning etc. (Scotland) Act 2006 puts the NPF3 on a statutory footing and provides the national context for development plans and planning decisions, as well as informing programmes of the Scottish Government, public agencies and local authorities.
138. There is high level support for the promotion of renewable energy developments throughout many parts of NPF 3. Chapter 3 of NPF3, 'A low carbon place', identifies that planning will play a key role in delivering the Scottish Government commitments set out in Low Carbon Scotland: the Scottish Government's report on proposals and policies. The priorities which are set out in this strategy set a clear approach which is consistent with Scottish climate change legislation.
139. The introduction states the Scottish Government's ambition to achieve at least an 80 % reduction in the emission of greenhouse gases by 2020. Paragraph 3.1 states that *"the priorities identified in this spatial strategy set a clear direction of travel which is a consistent with our world leading climate change legislation."*
140. Paragraph 3.7 of NPF3 states that the planned approach to onshore wind energy development has ensured that the proposed Development largely avoids internationally and nationally protected areas. It is also recognised that, whilst opinions about onshore wind in particular locations can vary, there is strong public support for wind energy as part of the energy mix.
141. In the section 'Scotland tomorrow', the Scottish Government 2020 targets of a reduction of 12 % in the total final energy demand, 30 % of overall energy demand from renewables and the generation of at least 100 % of gross electricity consumption are reaffirmed and the Electricity Generation Policy Statement 2013 sets out how these targets will be met.
142. NPF 3 recognises the important role that renewable energy developments can have in improving the long term resilience of rural communities. It advises at paragraph 3.7 that in some areas onshore wind energy *"is recognised as an opportunity to improve the long-term resilience of rural communities. We are seeing more communities benefiting from local ownership of renewables, with at least 285 MW of community and locally-owned schemes installed by 2013."* Paragraph 3.15 goes on to advise that the Scottish Government are aiming to achieve at least 500 MW of renewable energy in community and local ownership by 2020. The proposed Development is being brought forward with the opportunity for community shared ownership.
143. Paragraph 3.9, of NPF 3, makes it clear that the Scottish Government wants to continue to capitalise on the wind resource of Scotland. By presenting an application that maximises the potential of the Site to generate electricity whilst respecting environmental considerations it is submitted that the proposed Development is seeking to capitalise on the wind resource within south west Scotland.
144. NPF3 advises that, whilst Scotland is making good progress in diversifying the energy generation capacity and lowering carbon emissions, more action is required by way of continuing to capitalise on the wind resource to ensure



security of supply. Paragraph 3.22 makes it clear that onshore wind development will continue to make a significant contribution to the diversification of energy supplies.

145. NPF 3 advises, at paragraph 3.24, the local and community ownership can have a lasting impact on rural Scotland building business and community resilience and providing an alternative source of impact. It states that *“collectively the potential benefits of community energy projects are nationally significant.”*

146. NPF 3 provides strong support for developments such as the proposed Development.

#### 4.3.2 Scottish Planning Policy 2014

147. The SPP provides the planning policy of the Scottish Government relating to nationally important land use matters. It is an important material consideration as it reflects the Scottish Ministers' priorities for the operation of the planning system and for the development and use of land. As is the case with NPF 3 it is expected that the targets relating to renewable energy and the reduction of greenhouse gases which are provided in the current SPP will be updated and pushed out in the next version of SPP, following the lead of Energy Policy contained in the SES and OWPS.

##### SPP Vision

148. The introduction of SPP sets out planning outcomes which are designed to explain how planning should support the vision of the SPP. Three of the four are considered to be relevant to the consideration of the proposed Development. These are:

- Outcome 1: A successful sustainable place;
- Outcome 2: A low carbon place; and
- Outcome 3: A natural resilient place.

149. Outcome 2 is perhaps the most relevant and it explains that NPF3 will facilitate the transition to a low carbon economy, particularly by supporting diversification in the energy sector. Paragraph 18 of SPP refers to the 2009 Act which sets a target of reducing greenhouse emissions by at least 80 % by 2050 and an interim target of reducing emissions by at least 42 % by 2020. This target has now been met, however the Scottish Government has announced further carbon emission targets in the 2017 Climate Change Plan as described in **Appendix 2** of this Planning Statement. This sets out the requirement, in Section 44 of the 2009 Act, for all public bodies to act in the following ways:

- in the best way calculated to contribute to the delivery of emissions targets in the 2009 Act;
- in the best way calculated to help deliver the Governments climate change adaption programme; and
- in a way that it considers is most sustainable.

150. In the cases of Corlic Hill Windfarm (Reference PPA-280-2022, May 2016) and Windy Edge Windfarm (Reference PPA-140-2055, June 2016) the Reporters placed significant weight on the benefits of projects with the potential to generate substantially less than the proposed Development (16 and 22.5 MW respectively compared to 134 MW). In the case of Corlic Hill the Reporter found that the output of the proposed windfarm represented *“a valuable contribution to Scottish, UK and international targets for greenhouse gas emissions reduction and the use of renewable energy”*. He went on to conclude that *“it would also potentially assist in providing greater security of supply in the Scottish energy market by potentially displacing imported energy”*.

151. It is submitted that the proposed Development would make a valuable contribution to Scottish, UK and international targets for greenhouse gas emission reduction, and the use of renewable energy.

##### SPP Principle Policies

152. SPP sets out 2 Principal Policies – Sustainability and Place Making. In the context of sustainability paragraph 24 states that: *“The Scottish Government’s central purpose is to focus government and public services on creating a more successful country, with opportunities for all of Scotland to flourish, through increasing sustainable economic growth.”* Where sustainable economic growth is defined as: *“building a dynamic and growing economy that will provide prosperity and opportunities for all, while ensuring that future generations can enjoy a better quality of life too”*.

153. Paragraph 4 of SPP is clear that the planning service should seek to focus on outcomes, maximising benefits and balancing competing interests. It is submitted that the proposed Development does achieve a balance of maximising the potential of the Site whilst respecting the environmental constraints and the significant impact on landscape.

#### **SPP Presumption in Favour of Development**

154. SPP creates a presumption in favour of development that contributes to sustainable development. Sustainable development is focussed on throughout the SPP. Paragraph 28 advises that: *“the planning system should support economically, environmentally and socially sustainable places by enabling development that balances the costs and benefits of the proposal over the longer term. The aim is to achieve the right development in the right place; it is not to allow development at any cost.”*
155. It is submitted that the proposed Development is considered to be appropriately located and balances the environmental effects with the energy benefits in an acceptable manner.

#### **SPP Development Management**

156. Paragraph 29 of SPP advises that planning policies and decisions should be guided by a number of principles, including:
- giving due weight to net economic benefit; and
  - making efficient use of existing capacities of land.
157. The proposed Development is adjacent to the Kintyre Way and as such, benefits from good public access. The proposed Development makes efficient use of the existing land by maximising the use of the existing roads, some of the borrow pits and the construction compound/laydown area and other hardstandings. This practice would minimise the creation of infrastructure and associated environmental impact.
158. Under the heading Development Management, Paragraph 32 of SPP states, *“the presumption in favour of sustainable development does not change the statutory status of the Development Plan as the starting point for decision-making. Proposals that accord with up-to-date plans should be considered acceptable in principle and consideration should focus on the detailed matters arising.”*
159. Paragraph 33 of SPP advises that if the Development Plan is over five years old, the relevant policies are out of date; if there are no relevant policies then the presumption in favour of sustainable development is a significant material consideration.
160. The Development Plan is currently up to date having been adopted in October 2014. It is noted that it was adopted in October 2014 it will therefore be 5 years old later this year. As such, at the point of determination, it may be considered of lesser weight than a more recent Development Plan and the presumption in favour of sustainable development would be considered as a significant material consideration. It is acknowledged that the Wind Energy Supplementary Guidance, which is part of the Local Development Plan was adopted in December 2015 and was prepared in the context of SPP. When SPP is updated, the weight to the Supplementary Guidance would be diminished. It is considered that the presumption in favour of sustainable development is an important consideration which should attract significant weight in favour of this application in the determination process.

#### **SPP Scheduled Monuments**

161. SPP paragraph 145 relates to Scheduled Monuments (SMs) and is applied only to such designated sites. The SPP Glossary definition of SMs advises that they are:
- “Archaeological sites, buildings or structures of national or international importance. The purpose of scheduling is to secure the long term legal protection of the monument in the national interest, in-situ and as far as possible in its existing state and within an appropriate setting.”*
162. Paragraph 145 of SPP states:
- “Where there is potential for a proposed development to have an adverse effect on a scheduled monument or on the integrity of its setting, permission should only be granted where there are exceptional circumstances. Where a*

*proposal would have a direct impact on a scheduled monument, the written consent of Scottish Ministers, via a separate process is required in addition to any other consents required for the development."*

163. It is understood from paragraph 145 of SPP, and the definition of SMs, that SMs should be preserved within an 'appropriate setting'; and, that the proposed Development should avoid adverse effects on the 'integrity' of those settings. The EIA Report **Chapter 11 Archaeology and Cultural Heritage** advises that there are no predicted significant effects on heritage assets or their settings resulting from the proposed Development. This test is therefore not considered further in this Planning Statement.

#### **SPP A Low Carbon Place**

164. SPP contains a number of subject policies; one of these is A Low Carbon Place. The importance that the role of NPF3 places on the transition to a low carbon economy is highlighted in paragraph 152. Paragraph 153 of SPP advises that terrestrial planning facilitates the development of renewable energy technologies, links generation with consumers and guides new infrastructure to appropriate locations. It advises that efficient supply of low carbon and low cost generation of electricity from renewable resources are vital to reducing greenhouse gases. It also advises that renewable energy presents a significant opportunity for associated development, investment and growth in the supply chain.

165. In Paragraph 154 the SPP states (inter alia) that:

*"The planning system should:*

- *support the transformational change to a low carbon economy, consistent with national objectives and targets, including deriving:*
- *30% of overall energy demand from renewable sources by 2020\*;*
- *11% of heat demand from renewable sources by 2020; and*
- *the equivalent of 100% of electricity demand from renewable sources by 2020;*
- *support the development of a diverse range of electricity generation from renewable energy technologies - including the expansion of renewable energy generation capacity - and the development of heat networks;*
- *guide development to appropriate locations and advise on the issues that will be taken into account when specific proposals are being assessed;"*

166. \* It should be noted that the Scottish Government now have a target of 50 % of overall energy demand to be met from renewable sources by 2030. The proposed Development would make a valuable contribution towards meeting targets set out in SPP and beyond.

#### **SPP Onshore Wind Spatial Framework**

167. Onshore wind is specifically considered in SPP starting at paragraph 161. SPP advises that Planning Authorities should set out in the Development Plan a spatial framework identifying areas likely to be most appropriate for onshore windfarms where there is the greatest potential for onshore wind development. Table 1 of SPP, which sets out the spatial framework requirements, is provided as **Table 4.2**.

<b>Group 1: Areas where wind farms will not be acceptable:</b> National Parks and National Scenic Areas.		
<b>Group 2: Areas of significant protection:</b> Recognising the need for significant protection, in these areas wind farms may be appropriate in some circumstances. Further consideration will be required to demonstrate that any significant effects on the qualities of these areas can be substantially overcome by siting, design or other mitigation.		
National and international designations: <ul style="list-style-type: none"> <li>World Heritage Sites;</li> <li>Natura 2000 and Ramsar sites;</li> <li>Sites of Special Scientific Interest;</li> <li>National Nature Reserves;</li> <li>Sites identified in the Inventory of Gardens and Designed Landscapes;</li> <li>Sites identified in the Inventory of Historic Battlefields.</li> </ul>	Other nationally important mapped environmental interests: <ul style="list-style-type: none"> <li>areas of wild land as shown on the 2014 SNH map of wild land areas;</li> <li>carbon rich soils, deep peat and priority peatland habitat.</li> </ul>	Community separation for consideration of visual impact: <ul style="list-style-type: none"> <li>an area not exceeding 2 km around cities, towns and villages identified on the local development plan with an identified settlement envelope or edge. The extent of the area will be determined by the planning authority based on landform and other features which restrict views out from the settlement.</li> </ul>
<b>Group 3: Areas with potential for wind farm development:</b> Beyond groups 1 and 2, wind farms are likely to be acceptable, subject to detailed consideration against identified policy criteria.		

Table 4.2: SPP Spatial Frameworks

168. The Site is located predominantly within a Group 2 Area of Significant Protection. This is due to the area of carbon rich soils, deep peat and priority peatland habitat. The presence of peat on the Site is a matter which has been carefully considered throughout the design evolution process. This has included peat probing work and consideration of peat depth, peat quality and peat slide risk. Further information is contained in **Chapter 10 Hydrology, Hydrogeology, Geology and Soils**, of the EIA Report. **Chapter 10 Hydrology, Hydrogeology, Geology and Soils**, of the EIA Report demonstrates how areas of deep peat have been avoided where possible and where infrastructure proposes mitigation e.g. floating roads. **Chapter 8 Ecology**, of the EIA Report, advises that the confidence in the success of the restoration (see paragraph 151) means that it is considered that the peatland restoration would lead to a net positive impact and likely net gain in biodiversity in time once the peatland restoration has succeeded. In any event the mapping which is used in the SNH Carbon and Peatland Map 2016 is high level mapping which should not be used to rule out potential developments. SNH 'Spatial Planning for Onshore Wind Turbines – natural heritage considerations' Guidance document makes this clear. It states that the national level map information:
- “cannot (and should not) be used in isolation to determine the impacts of a specific development proposal on peat. This should be based on a detailed, site specific survey of peatland habitats and peat depths across the site using existing methods. .... The location of a proposal in the mapped area does not, in itself, mean that the proposal is unacceptable, or that carbon rich soils, deep peat and priority peatland habitat will be adversely affected. The quality of peatland tends to be highly variable across an application site and a detailed assessment is required to identify the actual effects of the proposal, and to inform the location of site infrastructure...”*
169. The Draft Peatland and Energy Policy Statement issued by the Scottish Government provides a common basis from which it and its agencies act in developing and implementing policies in relation to peatland and energy. It contains clear advice and reiterates that the map is not to be used as a development management tool but is to assist in the preparation of spatial frameworks for onshore wind developments.
170. It is concluded that the proposed Development should be seen as being located in a Group 2 location under the terms of SPP Table 1.
171. With respect to other renewable energy generating technologies and storage, SPP advises that energy storage schemes help to support development of renewable energy and maintain stability of the electricity network in areas where reinforcement is needed.

### SPP Assessment of criteria set out in Paragraph 169

172. The SPP states that local development plans should set out the criteria that will be considered in deciding all applications for proposals for energy unfractured developments of different scales. It is noted, at paragraph 169 of SPP, that considerations will vary, relative to the scale of the proposal and area characteristics, but are likely to include:

- 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;
- cumulative impacts - planning authorities should be clear about likely cumulative impacts arising from all of the considerations below, recognising that in some areas the cumulative impact of existing and consented energy development may limit the capacity for further development;
- impacts on communities and individual dwellings, including visual impact, residential amenity, noise and shadow flicker;
- landscape and visual impacts, including effects on wild land;
- 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 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;
- the need for conditions relating to the decommissioning of developments, including ancillary infrastructure, and site restoration;
- opportunities for energy storage; and
- the need for a robust planning obligation to ensure that operators achieve site restoration.

173. These criteria cover and go beyond the matters which are identified in Schedule 9 for consideration in S36 applications.

174. The following text of this Planning Statement summarises the key findings of the environmental effects of the proposed Development which are presented in the EIA Report in the context of the 19 criteria set out in SPP, at paragraph 169. This draws on the EIA Report submitted as part of the application. This demonstrates that the matters referred in Schedule 9 of the 1989 Act have been considered by the Applicant. This Section of the Planning Statement considers the technical tests for the proposed Development and for ease of reference they are ordered as per the 19 criteria set out in SPP paragraph 169.

### *Net Economic Impact (Criterion 1, SPP Paragraph 169)*

175. SPR have a clear track record of delivering economic benefit as a result of their developments across Scotland and on the Kintyre Peninsular in particular. The BVG Report (September 2017) 'Economic Benefits from Onshore Wind' (BVG Associates, 2017), sets out some of the economic benefits that have been realised as a result of the investments that SPR have made in south west Scotland. From this it is evident from recent SPR experience, including the eight windfarms in south west Scotland subject of the BVG report, that suppliers of a wide range of goods and services within Argyll and Bute and Scotland as a whole would obtain benefit from the proposed Development. The eight windfarms recently constructed will result in a £1.6 billion lifetime investment with 66% of this within the UK. The study showed that, for these windfarms alone, investment in the local area amounted to £257 million, in addition to which the schemes generated £297 million GVA and created 7,768 local full time equivalent (FTE) jobs. Other economic

benefits include direct payment to community benefit schemes amounting to over £59 million over the 25 year lifetime of the windfarms.

176. **Chapter 14 Socio-economics, Recreation and Tourism**, of the EIA Report advises that it is anticipated that the proposed Development construction costs could total approximately £148 million, including turbines, solar arrays, civil engineering works, electrical plant and grid connection. It is expected that construction phase expenditure of the proposed Development approximately £21.5 million (approximately 16.1% of the overall total) would be spent in the WSA. An estimated £43.4 million (32.6% of the overall total) would be expected to be spent in Scotland as a whole.
177. During the 22 months' construction phase, the proposed Development is expected to support 268 FTE jobs during the wider construction phase. During the operational phase the proposed Development is expected to require between 3 and 5 new full time employees (engineers and technicians) locally. The proposed Development would contribute between 4-7 FTE jobs to the local economy over its operational life. The effect on employment during the operational phase is considered to be positive.
178. The Scottish economy would be expected to be boosted by a total of £49.1 million (assuming that the turbines are procured in Campbeltown) million of net GVA during the construction period. During the operational phase, based on a nominal 40 year period, the proposed Development would contribute some £60.4 million in GVA to the local economy through direct, indirect and multiplier effects, and over £170 million GVA to the economy of Scotland as a whole. This is considered to be a positive benefit of the proposed Development.
179. Should the proposed Development gain planning permission SPR is committed to offering a package of community benefits to local communities that would include the opportunity for the community to invest in the operational development. SPR would discuss with local stakeholders which communities would be the appropriate 'Community Organisations' to participate.
180. If the community were to invest in the ownership of the proposed Development it is expected that any proposed income streams could provide a long term, flexible revenue which could be used to support community projects within Argyll and Bute. A range of options would be available to local communities who would have the flexibility to be able to choose how the money is spent and prioritise it on the things which matter most to them.
181. The host community of West Kintyre Community Council has developed a Community Action Plan for 2017-2023<sup>3</sup> which gives an indication as to the type of initiatives that might be considered important within the West Kintyre Community Council area, including the following:
- creation of all ability tracks & paths, development of the Kintyre Way and development of recreational facilities at Tayinloan playing fields;
  - improved broadband and mobile phone services;
  - provision of community bus service;
  - supporting creation of small businesses and providing bursaries for further training;
  - purchase and conversion of unused buildings for community and small business use; and
  - improved promotion of West Kintyre as a place to live, work and raise a family.
182. Whilst these effects cannot be quantified at this stage due to uncertainty as to the quantum of funding that would be available to a Community Vehicle and its choice of investment priorities, it is clear that the proposed community investment measures could offer real socio-economic benefits to the local community and do have the potential to be significant.
- Contribution to Renewable Energy Generation Targets (Criterion 2, SPP Paragraph 169)*
183. As discussed in **Section 4.2** of this Planning Statement, the proposed Development would assist with the achievement of the UK and Scottish Government policies which set targets for renewable electricity generation. The proposed Development would make a valuable contribution to the current targets. Governments at Westminster and

<sup>3</sup> West Kintyre Community Council: Community Action Plan 2017-2013



Holyrood have made clear their ongoing commitment to the decarbonisation of electricity generation and the proposal would contribute to this policy objective.

184. The proposed Development would have a total installed capacity of around 134 MW (based on currently available technologies and assuming the same supplier for all turbine positions). This means that the proposed Development would produce between 360-380 GWh of electricity annually (based on site derived capacity factors of 31-36 %). This equates to the power consumed by approximately 99,200 homes.

185. The scale of the proposed turbines and inclusion of ground mounted solar arrays and battery storage means that potential of the Site is being maximised to its full generation potential while carefully balancing the environmental impacts to ensure that the proposed Development is environmentally acceptable.

186. It is concluded that the proposed Development would make a valuable and meaningful contribution to government targets. This view is in keeping with Reporters and Scottish Ministers decisions on other renewable energy projects.

*Effect on Greenhouse Gas Emissions (Criterion 3, SPP Paragraph 169)*

187. The proposed Development would make a valuable and significant contribution towards UK national generation targets and the reduction in emissions of greenhouse gases, principally Carbon Dioxide in becoming carbon neutral in less than one year.

188. The proposed Development would make Scotland, and therefore the UK, less reliant on imported and price-volatile fossil fuels by generating energy to supply domestic needs of households.

189. The potential savings in CO<sub>2</sub> emissions due to the proposed Development replacing other electricity sources over its lifetime (assumed to be 40 years for the purpose of the carbon calculator) are approximately:

- 328,912 tonnes of CO<sub>2</sub> per year over coal-fired electricity (8.2 million tonnes assuming a 40 year lifetime for the purposes of the carbon calculator);
- 90,658 tonnes of CO<sub>2</sub> per year over grid-mix of electricity (2.27 million tonnes assuming a 40 year lifetime for the purposes of the carbon calculator); or
- 160,881 tonnes of CO<sub>2</sub> per year over a fossil fuel mix of electricity (4.02 million tonnes assuming a 40 year lifetime for the purposes of the carbon calculator).

190. It is concluded that the proposed Development would make a valuable and meaningful contribution to the reduction of Greenhouse gas emissions.

*Cumulative Impacts (Criterion 4, SPP Paragraph 169)*

191. The cumulative impact of the proposed Development has been considered in the EIA process. In particular it has been considered in the context of landscape, ecology, ornithology, cultural heritage and noise and is addressed in **Chapters 7, 8, 9, 11 and 13** respectively. The windfarms within close context of the proposed Development considered in the EIA Report include the following:

- Freasdail (operational);
- Gartnagrenach Farm (operational);
- Cour (operational);
- Deucheran Hill (operational);
- Gigha (operational);
- Escairt (consented);
- Kilchmaig Farm (consented);
- High Constallation (in planning);
- Airigh (in planning);

- Killean (in planning); and
- Clachaig Glen (in planning).

#### Landscape

192. The potential for cumulative impacts as a result of the proposed Development is carefully considered in the EIA Report at **Chapter 7 Landscape and Visual Impact Assessment**. **Chapter 7 Landscape and Visual Impact Assessment**, of the EIA Report concludes that there would be Major/Moderate cumulative effects with High Constellation would occur within the host character area, AGC6 Upland Forest Moor Mosaic (A&BC 2017) / LCT 39 Plateau Moor and Forest – Argyll (SNH 2019), and these would be Significant. It advises that all other cumulative effects would be Not Significant.

#### Ecology and Ornithology

193. The potential for cumulative impacts as a result of the proposed Development on ecology and ornithology are considered in the EIA Report at **Chapters 8 Ecology** and **9 Ornithology** respectively. In the case of both no significant cumulative impacts are predicted as a result of the proposed Development.

#### Cultural Heritage

194. **Chapter 11 Archaeology and Cultural Heritage** of the EIA Report considers cultural heritage. No significant cumulative effects are predicted on cultural heritage or archaeology as a result of the proposed Development.

#### Noise

195. The potential for noise to cause an unacceptable impact cumulatively has been carefully considered as part of the design process in the EIA Report at **Chapter 13 Noise**. The potential for unacceptable cumulative noise effects, as a result of the proposed Development, were a key design factor. As a result of the design iteration process and the embedded mitigation no significant cumulative noise or vibration impacts are predicted as a result of the proposed Development.

#### Summary of Cumulative Impacts

196. It is concluded that although there would be some significant landscape and visual cumulative effects, when considered in the round, the cumulative effects of the proposed Development are considered to be acceptable.

#### *Impacts on Communities and Individual Dwellings (Criterion 5, SPP Paragraph 169)*

##### Economic Impact

197. The proposed Development offers to the opportunity for economic benefit to the local community. To date, SPR has voluntarily awarded over £1.6 million in community benefit funding to Argyll and Bute. A wide range of local projects and community initiatives in Argyll and Bute have been supported by the funds including:

- 174 community facilities and services projects totalling £339,025.60;
- 47 community or local event projects totalling £39,089.33;
- 16 environmental projects totalling £30,224.45;
- 11 heritage projects totalling £11,036;
- 26 skills and employment projects totalling £26,344.48;
- 73 sport and recreation projects totalling £79,290.17; and
- 129 youth and education projects totalling £102,981.21

198. Benefits would accrue from the scale and nature of the proposed income streams, which would include the proposed Development, and, depending on the choices made, could have a positive effect on the physical and mental well-being of local residents as well as economic benefits. The long term nature of the income, arising from community benefit, would allow the community to plan ahead, to draw in other sources of match funding to maximise the benefits and investment projects could be designed to match local priorities.

#### Landscape - Residential Visual Amenity

199. Some significant landscape and visual effects, as a result of any proposed renewable energy development incorporating wind turbines, are unavoidable. Wind turbines proposed within 2km of residential properties has the potential to cause significant visual effects on properties. This, however, is not necessarily unacceptable as there is a



long held planning principle that there is no right to a view from a private property and each development needs to be considered on its respective merits. With residential amenity the issue is, therefore, not simply that there is a significant effect on a property, but rather is that effect such that the property would become an unacceptable place to live because its amenity is so degraded by the presence of the proposed wind turbines.

200. This approach, which is often referred to as the Lavender Test, after the Inspector who formulated it, has been applied in a number of decisions relating to English cases and is articulated in a number of Scottish Reporters' and Ministers' decisions relating to windfarms. In the case of the Windy Edge Appeal Decision (Reference PPA-140-2055, June 2016) the Reporter stated:

*"I think it is important to differentiate between the general landscape and visual impacts which local residents would experience and the particular impacts on any individual property. A significant change to a view is not necessarily harmful in planning terms. .... It is more than a significant change to a view or that any individual resident would prefer not to live near a wind farm. The visual impact would have to be excessively dominant."*

201. In their Report on the proposed Fauch Hill/Harburnhead Windfarms (Reference PPA-400-2084 and EC00003190 respectively, July 2014) the Reporters stated that "the generally agreed guidance on the level of visual impact is known as the Lavender Test which assesses whether a property would become an unacceptable place to live because of the development."

202. In their decision in relation to the proposed Afton Windfarm (Reference EC00003134, October 2014) the Scottish Ministers advised that they considered that *"the development would not result in any over bearing visual effects on residential amenity to a degree that any property might be considered an unattractive place in which to live."*

203. The EIA Report includes an Assessment on Residential Visual Amenity RVAA at **Technical Appendix 7.2**. This has been carried out in accordance with the approach set out in the Landscape Institutes Technical Guidance Note 2/19 Residential Visual Amenity Assessment.

#### Noise

204. The potential for noise to impact on the local community and individual properties has been carefully considered as part of the design iteration process. As a result of this process no significant noise or vibration impacts are predicted on local communities and individual dwellings as a result of the proposed Development.

#### Shadow Flicker

205. The potential for the proposed Development to result in shadow flicker has been considered in **Chapter 15 Other Issues** of the EIA Report. The results confirm that the properties assessed would not experience over 30 hours of shadow flicker in a year and with a maximum of 29.2 hours predicted at any one property, that the predicted shadow flicker hours would be below the 30 hour limit and are, therefore, considered to be acceptable.

#### Private Water Supplies

206. The potential for private water supplies to be impacted by the proposed Development has been considered in the hydrological assessment and the findings of the work undertaken in presented in **Technical Appendix 10.3** It is concluded that there would be no significant impacts on private water supplies as a result of the proposed Development.

#### Traffic

207. **Chapter 12 Access, Traffic and Transport**, of the EIA Report considers the impact of the proposed Development on the local community. A TMP would be prepared prior to the commencement of the proposed Development and this TMP would be agreed with Argyll and Bute Council.

208. The impact on the traffic and transport network is considered to be acceptable.

#### Summary of impacts on communities and individual properties- criterion 5 of SPP of Paragraph 169

209. No significant effects have been identified through the EIA process in respect of potential impacts on communities and individual dwellings. It is acknowledged that careful management of the construction traffic at the site entrance would

be required and this would be addressed in the CEMP should consent be forthcoming. It is concluded that there are no effects on local communities and individual dwellings that mean that the proposed Development is unacceptable.

*Landscape and Visual Impacts (Criterion 6, SPP Paragraph 169)*

210. An assessment of the landscape and visual impacts (LVIA) of the proposed Development has been undertaken as part of the EIA process. The assessment is included in the EIA Report at **Chapter 7 Landscape and Visual Impact Assessment**.

*Visual Effects*

211. The majority of significant visual effects are identified as typically occurring within 6 km from the nearest proposed turbine. The assessment of effects on views has been informed by a series of 18 viewpoints that were selected, in agreement with SNH and Argyll and Bute Council, to represent visibility from a range of receptors and distances throughout the study area. **Chapter 7 Landscape and Visual Impact Assessment**, of the EIA report advises that the visual receptor groups of Whitehouse, Gartavaich and South Knapdale would experience Major/Moderate effects as a result of the proposed Development that would be Significant.
212. **Chapter 7 Landscape and Visual Impact Assessment**, further advises that the proposed Development would result in Moderate effects on the A83 on the stretch of the route between Whitehouse and Ronachan, which would be Significant. Moderate effects would also occur within 5 km of Kennacraig on the ferry routes from Kennacraig to Port Askaig and Port Ellen and would be Significant.
213. The EIA Report **Chapter 7 Landscape and Visual Impact Assessment** concludes that the Kintyre Way would experience Major effects on the sections of the route with open views of the proposed Development as it passes along the boundary of the proposed Development and also where it runs parallel to the A83 to the north east of Rhonachan. These effects would be Significant.
214. Moderate effects on views would occur at the summit of Dun Skeig which would be Significant.
215. The EIA Report concludes that elsewhere, effects on visual receptors would be Not Significant.
216. The limited visual effects are considered to be acceptable.

*Impact on Landscape Character*

217. The LVIA has identified significant effects for localised parts of the landscape character areas that cover the Site and its immediate surroundings.
218. **Chapter 7 Landscape and Visual Impact Assessment** of the EIA Report advises that the extent of operational effects upon landscape character would be limited by the topographic containment of the Kintyre peninsula and Significant effects would be contained within approximately 6 km from the proposed Development. This would include a Significant effect upon localised parts of the LCT6 Upland Forest Moor Mosaic and LCT 20 Rocky Mosaic which are considered to be of Medium or High/Medium sensitivity and both of which are already influenced of renewable energy development. Beyond this there would be No Significant effects on landscape character in the wider parts of these LCTs or any other landscape character type.
219. There would be a Significant effect on part of West Loch Tarbert within the Coastal Landscape Character Type 9: Sounds, Narrows and Islands. Effects within other parts of the Coastal Landscape Character Type would be Not Significant.
220. The effects of the proposed Development on landscape character are considered to be acceptable.

*Impact on Landscape Designations*

221. The Site is not located in any area designated for landscape reasons. The following designated areas are considered in the EIA Report at **Chapter 7 Landscape and Visual Impact Assessment**.
- The North Arran NSA (7.3 km, South East of the proposed Development);
  - North Arran SLA (North Ayrshire Council) – (9.8 km South East of the proposed Development); and

- The Knapdale/ Melfort APQ (over 3km west of the proposed Development).

222. The designations are shown on **Figure 7.1** of the EIA Report.

223. The EIA report concludes that there would be no significant effects would occur on any designated landscapes.

224. The impact of the proposed Development on landscape designations is considered to be acceptable.

#### Landscape Capacity

225. The EIA Report **Chapter 7 Landscape and Visual Impact Assessment** advises that the proposed Development represents a good design fit and adheres to much of the design guidance within The Argyll and Bute Landscape Wind Energy Capacity Study 2017 (ABLWECS) for very large wind energy development within LCT6: Upland Forest Moor Mosaic. Given the location adjacent to Freasdale and 10 km from Cour Windfarm, the strategic pattern of wind energy development would be maintained on the Kintyre peninsula, albeit larger arrays would be present where they exist. Whilst there would be some noticeable differences in turbine sizes, this would not be readily apparent from areas to north of the proposed Development. The areas where this would occur to the south would be limited or more distant where the effect would not be so noticeable. There are limited additional areas affected by the proposed Development, which are not already influenced by renewable energy development.

226. The use of landscape capacity studies is considered further in **Section 4.5** of the Planning Statement. It is concluded that there is landscape capacity for the proposed Development.

#### Summary of Landscape and Visual Impacts - Criterion 6 of SPP Paragraph 169

227. **Chapter 7 Landscape and Visual Impact Assessment** of the EIA Report advises that it should be noted that an effect may be locally significant or significant with respect to a small number of receptors, but may not be significant when judged in a wider context. The conclusion that some effects are 'significant' must not be taken to imply that they should warrant refusal in any decision making process. Overall, the scale and topography of the receiving landscape is considered appropriate to accommodate the proposed Development. Whilst there would be some significant effects identified on both landscape and visual receptors within the study area, it is evident from this assessment that due to the site selection and careful design, the extent of significant landscape and visual effects have been minimised as a result.

228. It is acknowledged that there would be significant impacts on landscape and visual amenity as a result of the proposed Development. The design has been subject to a comprehensive review process, to ensure that as far as reasonable landscape and visual impacts of the proposed Development have been mitigated and avoided.

229. The final design of the proposed Development has minimised effects within the wider landscape resource and ensured that the proposed Development has an appropriate landscape fit within the scale of the host landscape types and wider surrounding landscape context. It is considered that there is capacity for the proposed Development in this part of Argyll and Bute

230. For the reasons that are set out in the DAS, the EIA Report and this Planning Statement the proposed Development is considered to be, on balance, acceptable in landscape terms.

#### Effects on the Natural Heritage, Including Birds (Criterion 7 SPP Paragraph 169)

231. The Site is not located within any international, national or local ecology or ornithological designations. **Chapter 8 Ecology** of the EIA Report identifies the ecology designated sites in the vicinity of the proposed Development. It advises that there are no statutory designated sites within the Site. There are ten statutory designated sites, within a 10km radius of the Site which are detailed in **Table 8.2** and illustrated in **Figure 8.1** of the EIA Report.

232. **Chapter 9 Ornithology** of the EIA Report advises that there are three SPAs within 20 km of the site. These are the Kintyre Goose Roosts SPA, Knapdale Lochs SPA and Arran Moors SPA.

233. **Chapter 9 Ornithology** of the EIA Report advises that the nearest designated areas for birds is the Kintyre Goose Roosts SPA which lies approximately 5.5 km south west of the proposed Development and is designated for its non-breeding population of GWF geese. The Knapdale Lochs SPA, at its nearest point, is approximately 10 km to the

north west of the proposed Development and is designated for its breeding black-throated diver population. The Arran Moors SPA, at its nearest point, is approximately 16 km to the south east of the proposed Development and is designated for its breeding hen harrier population.

234. A number of ecology and ornithology surveys have been undertaken and the results of these have been provided in the EIA Report at **Chapters 8 Ecology** and **9 Ornithology** respectively. The presence of ecological features, have been carefully considered as part of the design iteration process for the proposed Development.
235. In the case of ecology, it is concluded that there would be no significant impacts on any ecological features subject to the inclusion of the appropriate mitigation which is detailed in the EIA Report. This includes habitats and fauna. It is anticipated that the proposed peatland restoration would lead to a net positive impact and likely net gain in biodiversity in time once the peatland restoration has succeeded. In the case of ornithology, it is concluded, the likely effects of the proposed Development are not significant under the terms of the EIA Regulations. The non-significant effects which have been predicted on natural heritage, including birds but excluding landscape, are considered to be acceptable.
236. In the case of ornithology it is concluded that the likely effects of the proposed Development on all bird species are not significant under the terms of the EIA Regulations. In respect of the Kintyre roost SPA it is concluded that none of the SPA's conservation objectives would be compromised by the proposed Development alone, or in combination with other developments, and the Sheirdrim Renewable Energy Development would, therefore, not affect the integrity of the SPA.
237. The impacts of the proposed Development on natural heritage resources are considered to be acceptable.

*Impacts on Carbon Rich Soils, Using the Carbon Calculator (Criterion 8, SPP Paragraph 169)*

238. Each unit of wind generated electricity would displace a unit of conventionally generated electricity, therefore, saving power station emissions. **Table 15.4** of the EIA Report provides a breakdown of the estimated emissions displaced per annum and over the assumed 40 year lifespan for the proposed Development. The reference for the online Carbon Calculator Tool is 3G17-2RPY-1ENS-V8.
239. The calculations of total carbon dioxide emission savings and payback time for the proposed Development indicates the overall payback period of the proposed Development, over a 40 year period, would be approximately 1.6 years, when compared to the fossil fuel mix of electricity generation.
240. This means that the proposed Development is anticipated to take around 19 months (1.6 years) to repay the carbon exchange to the atmosphere (the CO<sub>2</sub> debt) through construction of the wind turbine element of the proposed development; the Site would in effect be in a net gain situation following this time period and can then claim to contribute to national objectives.
241. The proposed Development includes peatland restoration which it is considered would lead to a net positive impact and likely net gain in biodiversity in time once the peatland restoration has succeeded.
242. The impacts of the proposed Development on carbon rich soils have been carefully considered and are considered to be acceptable. The carbon calculator has been used to calculate the carbon payback which is considered to be acceptable.

*Public Access (Criterion 9, SPP Paragraph 169)*

243. The Kintyre Way is located along the south eastern boundary of the Site and in part is within the application boundary.
244. The Land Reform (Scotland) Act 2003 conferred general access rights over much of rural Scotland. The lack of any designated or recorded paths across the Site does not necessarily preclude the right of the public to use the area for recreational purposes including for walking, cycling and horse riding.
245. It is expected that members of the public may use parts of the site for walking and cycling and horse riding informally. The EIA Report at **Chapter 14 Socio-economics, Recreation and Tourism** advises that the provision of new tracks within the Site as a result of the proposed Development would have a beneficial effect for users, although within the context of being managed as a commercial forest. Given the temporary nature of the construction works, the

measures that would be put in place and the low sensitivity of the receptors, the effect on such users would be negligible and not significant. The impact of the proposed Development on public access is considered to be acceptable.

*Impacts on the Historic Environment (Criterion 10, SPP Paragraph 169)*

246. **Chapter 11 Archaeology and Cultural Heritage** of the EIA Report considers archaeology and cultural heritage. World Heritage Sites, inventoried Battlefields, inventoried GDLs, Conservation Areas, or Historic Marine Protected Areas within 10 km of the proposed wind turbines.
247. There are nine Category B listed buildings of regional importance within 5 km of the Inner Study Area used in the archology and cultural heritage assessment. It is noted that two buildings, the Balinakill Steading, Balinakill Estate, Clachan, are under the same index number. Within the Outer Study Area there are nine scheduled monuments of a national importance. In response to consultation with HES, designated heritage assets in proximity of the Outer Study Area and up to 10 km from the proposed turbine locations have been considered for assessment, where location and nature of the assets indicates that long distance views may contribute to the heritage significance of the monument. Within this area there are 10 scheduled monuments and one category A listed building.
248. The proposed Development includes proposals which would improve access to sheiling sites along the Larachmòr Burn. In close proximity to the Kintyre Way, the installation of information boards and recreational paths as part of the proposed Development would facilitate greater understanding and appreciation of the historic land use and settlement of the area; thereby enhancing the experience of the general public. Such experiences may aid the public knowledge of the people who worked in these landscapes and stimulate interest in historic landscapes of Kintyre.
249. The EIA Report advises that there would be no direct impact upon known heritage assets within the Site as a result of the proposed Development. The assessment did find indirect impacts from the operation of the proposed Development, which would include the following:
- very slight significance of effect upon Dun Skeig, duns and fort, (SM2491);
  - a slight significance of effect upon cup marked stones SLR Nos 127 to 130, 119, 121, and 122;
  - slight significance of effect upon Dun Mor fort, (SLR No 116); and
  - a very slight significance of effect upon Barr na Cour, galleried dun, (SLR No 117).
250. As all of these are within the lowest level of effect identified within the SNH and HES EIA Handbook 2018 (Appendix 1, Figure 1). There are no predicted significant effects in EIA terms on heritage assets resulting from the construction or operation of the propose Development. In respect to SPP paragraph 145, the assessment concludes that there would be no EIA significant adverse effect on the integrity of the setting of scheduled monuments.

*Impacts on Tourism and Recreation (Criterion 411, SPP Paragraph 169)*

251. The impacts of the proposed Development on tourism and recreation are considered in **Chapter 14 Socio-economics, Recreation and Tourism** of the EIA Report. It undertakes a review of published reports which consistently find that there is no conflict between visitors and the development of onshore windfarms. These documents include:
- Visit Scotland (2014) Scotland Key facts on tourism 2014;
  - Visit Scotland (2015) Scotland Visitor Survey;
  - Glasgow Caledonian University, Moffat Centre, Cogentsi (2008) The economic impact of Windfarms on Scottish tourism. A Report for Scottish Government;
  - Economy Energy and Tourism Committee 7th Report, 2012 Report on the achievability of the Scottish Governments renewable energy targets; and
  - BiGGAR Economics (2016) Windfarms and Tourism Trends In Scotland– A Research Report.
252. The overall conclusion of this review is that published national statistics on employment in sustainable tourism demonstrate that there is no relationship between the development of onshore windfarms and tourism employment at the level of the Scottish economy, either at local authority level or in the areas immediately surrounding windfarm

development. Therefore, the likely effect of the proposed Development when operational, should it be consented, on the tourism and visitor economy is assessed as negligible and not significant.

253. The impact on public access, which includes recreation, has already been considered and this is not repeated. No impact on recreation in the Site is predicted.

254. The impact of the proposed Development on tourism and recreation are considered to be minimal and therefore acceptable.

*Impacts on Aviation and Defence Interests and Seismological Recording (Criterion 12, SPP Paragraph 169)*

255. The EIA Report considers the potential for the proposed Development to impact upon aviation and defence interests in **Chapter 15 Other Issues**. From the consultation which has been undertaken it is concluded that the proposed Development, would not have an effect on aviation, from either physical obstruction or radar interference. This is considered to be acceptable. No seismological effects are predicted as a result of the proposed Development.

*Impacts on Telecommunications and Broadcasting Installations (Criterion 13, SPP Paragraph 169)*

256. The potential impact of the proposed Development on telecommunications and broadcasting installations has been considered as part of the EIA Report. There is no indication that the proposed Development would interfere with telecommunications links. There is no predicted impact on these facilities. This is considered to be acceptable.

*Impacts on Road Traffic (Criterion 14, SPP Paragraph 169)*

257. The EIA Report **Chapter 12 Access, Traffic and Transport** considers the potential for the proposed Development to have a significant impact on road traffic. The proposed Development would not result in significant adverse effects with regards to Site access, traffic and transportation. The assessment has been based on the worst case scenario, with all rock material sourced from external site locations. A more realistic scenario has also been assessed using onsite borrow pits and it is anticipated that they would supply the Site with the majority of material required to construct the access tracks which would further reduce the amount of HGV movements required to build the proposed Development. In summary, the proposed Development would create an increase to HGV traffic levels within the study area but these levels would remain well within the design capacity of the local road network. This is the case for the worst case scenario and the more realistic scenario of using onsite borrow pits to provide materials for the Site.

258. The impact of the construction phase on each of the identified environmental criteria has been categorised as 'not significant'. The impacts of the proposed Development are considered to be acceptable.

*Impacts on Adjacent Trunk Roads (Criterion 15, SPP Paragraph 169)*

259. It is proposed that the wind turbine components would be delivered to Campbeltown Harbour. A preliminary Route Survey assessment has determined that, based on the wind turbine components considered, transport loads would follow a predetermined route which turns right on Hall Street from the quayside before following Kinloch Road. Transport loads would then turn left onto Aquilbrium Avenue then continue onto the A83. The abnormal loads would then continue north on the A83 before reaching the site access junction. The turbine transport loads would be moved from the port of entry (Campbeltown) to the Site under police escort.

260. It is expected that wind turbine towers would be sourced from the CS Wind UK manufacturing factory in Machrihanish, transport loads would depart the factory and turn right before continuing east/north east to the junction with the A83. These loads would then travel north on the A83 until they reached the site access junction, also under police escort

261. For other technologies that would be installed on site, it is likely that they would be delivered using standard articulated lorries utilising the road network between Glasgow and Kintyre.

262. No significant impacts on the trunk road network are predicted as a result of the proposed Development. This is therefore considered to be acceptable.

*Effects on Hydrology, the Water Environment and Flood Risk (Criterion 16, SPP Paragraph 169)*

263. The potential for significant impacts on soils, geology and the water environment as a result of the proposed Development are considered in the EIA Report at **Chapter 10 Hydrology, Hydrogeology, Geology and Soils**. Good practice measures would be applied in relation to pollution risk, sediment management, peat management and



management of surface runoff rates and volumes. This would form part of the Construction Environment Management Plan (CEMP) to be implemented for the proposed Development and would be agreed prior to construction, an outline of which is provided in **Technical Appendix 3.1: outline Construction Environmental Management Plan**.

264. The EIA Report finds no significant effects on hydrology or the water environment. It finds no significant risk of flooding. These findings are subject to the implementation of mitigation measures which would be covered by a planning condition should consent be forthcoming. The proposed Development is therefore considered to be acceptable in terms of its effects on hydrology, the water environment and flood risk.

*The Need for Conditions Relating to the Decommissioning of Developments (Criterion 17, SPP Paragraph 169)*

265. There is no proposal to limit the lifetime of the proposed Development. Should consent be granted, it is anticipated that there would be a condition which would deal with the requirement to remove turbines/solar or any associated equipment if they become non-operational for a defined period of time.

*Opportunities for Energy Storage (Criterion 18, SPP Paragraph 169)*

266. The proposed Development includes a compound for ancillary grid services. The facility would be able to undertake a range of ancillary services as welcomed by National Grid, such as storing electricity, both importing and exporting power to the National Grid network as required and allowing the grid to manage both supply and demand (balancing services). The facility may also offer other services to National Grid such as frequency control, reactive power compensation and re-starting the electrical grid in the event of failure ('black start'). Amongst a range of services, an energy storage facility would provide back-up power to National Grid for the benefit of providing stability to the electricity supply network and the integration of more renewable energy generation. This would include battery containers, with up to 38 MW of battery equipment.

*The Need for a Robust Planning Obligation to Ensure that Operators Achieve Site Restoration (Criterion 19, SPP Paragraph 169)*

267. There is no proposal to limit the lifetime of the proposed Development. Should consent be granted, it is anticipated that there would be a condition which would deal with the requirement to remove turbines, solar or associated equipment if they become non-operational for a defined period of time or in the event of the proposed Development being decommissioned.

**SPP Conclusions**

268. The proposed Development would meet the principles set out in SPP (paragraph 29). They would assist in the delivery of the outcomes which are identified in SPP and are considered to be consistent with sustainable development. The proposed Development is considered to satisfy the criteria which are set out at paragraph 169 of SPP. The proposed Development is in an area which has the potential for windfarm development subject to the satisfaction of the relevant criteria. The relevant criteria have been considered and addressed through the EIA process. It has been concluded that, although there are a number of significant landscape and visual impacts as a result of the proposed Development, these are considered acceptable when the proposed Development is considered as a whole.
269. SPP also sets out a clear presumption in favour of development that contributes to sustainable development. Reference has been made to the application of the presumption in various Appeal cases and these are set out in this Planning Statement. It is submitted that weight should be attached to the meaningful contributions the proposed Development would make to meeting sustainability targets.
270. The proposed Development has been considered against the criteria set out in paragraph 169 of SPP. No significant effects have been found as a result of the proposed Development in respect of any of the criteria with the exception of landscape and visual. The significant landscape and visual effects have been found to be limited to approximately 6 km of the Site. These impacts are considered to be contained and localised. It is concluded in the LVIA that the landscape is capable of accommodating the proposed Development.
271. It is concluded that, when the proposed Development, the significant impacts which it would have and the benefits it would bring are considered in the whole, the proposed Development is acceptable and should gain consent.

#### 4.4 The Development Plan

272. The Site is located within the administrative area of A&BC. The Development Plan for the proposed Development comprises the Argyll and Bute Local Development Plan (ABLDP) and its associated Supplementary Guidance.

##### 4.4.1 Argyll and Bute Local Development Plan 2015

273. Argyll and Bute Council adopted the ABLDP in March 2015, the LDP is accompanied by Supplementary Guidance adopted in March 2016. This provides further detail and guidance on the policies within the LDP, and where necessary supplements these with additional policy requirements. The ABLDP is therefore considered to be a relevant and up to date Local Development Plan, noting that the weight to be attached to it would decrease once it becomes 5 years old in early of 2020 and also in the context of the revisions in SPP and NPF 3 to reflect SES and OWE and the 2019 Planning Act.

274. The vision set out in the ABLDP states:

*“The overall vision for Argyll and Bute is one of an economically successful, outward looking and highly adaptable area, which enjoys an outstanding natural and historic environment, where all people, working together, are able to meet their full potential and essential needs, locally as far as practicable, without prejudicing the quality of life of future generations.”*

275. The key ABLDP policy for the proposed Development is Policy LDP 6 – Supporting the Sustainable Growth of Renewables, which states that

*“The Council will support renewable energy developments where these are consistent with the principles of sustainable development and it can be adequately demonstrated that there would be no unacceptable significant adverse effects, whether individual or cumulative, including on local communities, natural and historic environments, landscape character and visual amenity, and that the proposals would be compatible with adjacent land uses. A spatial framework for wind farms and wind turbine developments over 50 metres high in line with Scottish Planning Policy will be prepared as Supplementary Guidance.*

*This will identify:*

- Areas where wind farms will not be acceptable.
- Areas of significant protection.
- Areas which may have potential for wind farm development.

*All applications for wind turbine developments will be assessed against the following criteria:*

- 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.
- Cumulative impacts arising from all of the considerations below.
- Impacts on communities and individual dwellings, including visual impact, residential amenity, noise and shadow flicker.
- Landscape and visual impacts, including effects on wild land.
- 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.
- The need for conditions relating to the decommissioning of developments, including ancillary infrastructure, and site restoration.
- Opportunities for energy storage.
- The need for a robust planning obligation to ensure that operators achieve site restoration.

*Further information and detail on matters relating to the growth of renewables. A spatial framework for onshore wind energy developments will be provided in Supplementary Guidance."*

276. The policy states that the Council will prepare a spatial framework for wind turbine developments over 50 m high as supplementary guidance, in accordance with SPP. This guidance was adopted in December 2016 in the form Supplementary Guidance 2: Renewable Energy. The spatial framework identifies areas which have potential for wind turbine development, and those which don't, including areas requiring significant protection in accordance with the criteria set out in Table 1 of SPP. According to the spatial framework map, the proposed Development lies partly in a Group 3 Area (area with potential for wind turbine development subject to other policy considerations). The remainder of the Site is considered to be a Group 2 Area. This is due to the presence of peat on the Site. This is in keeping with the findings in respect of Table 1 of SPP.
277. The wind energy policy is generally supportive of windfarm developments subject to the satisfaction of specified criteria. The matters raised these criteria have been addressed in the context of SPP and **Table 4.3**. The commentary in respect of the criteria is not repeated here.
278. The following policies of the ABLDP are also considered to be relevant to the proposed Development:
- Policy LDP STRAT 1– Sustainable Development;
  - Policy LDP 3 – Supporting the Protection, Conservation and Enhancement of our Environment;
  - Policy LDP 9 – Development Setting, Layout and Design;
  - Policy LDP10 – Maximising our Resources and Reducing Our Consumption;
  - Policy LDP 11 – Improving our Connectivity and Infrastructure; and
  - Policy LDP5 – Supporting the Sustainable Growth of Our Economy.
279. These policies are provided in full in **Appendix 4** of this Planning Statement for ease of reference. An assessment of the proposed Development against these policies is contained in **Table 4.3**. **Table 4.3** is contained in **Section 4.4.2** of this Planning Statement.

#### 4.4.2 Argyll and Bute Local Development Plan Supplementary Guidance

280. Following consideration by the Scottish Ministers, A&BC adopted ABLDP Supplementary Guidance (ABLDPSG). Supplementary Guidance 2 (ABLDPSG2), which covers Renewable Energy, was adopted in December 2016. These 2 documents are considered within the following text.
281. The following policies within the current supplementary guidance considered to be relevant to the proposed Development which have been considered during the design of the proposed Development and in the subsequent EIA:
- SG LDP Sustainable - Sustainable Siting and Design;
  - Principles SG LDP ENV 9 – Development Impact on Areas of Wild Land;
  - SG LDP ENV 12 - Development Impact on National Scenic Areas (NSAs);
  - SG LDP ENV 13 - Development Impact on Areas of Panoramic Quality (APQs);
  - SG LDP ENV 14 – Landscape; and
  - SG LDP ENV7- Water Quality and the Environment.

282. These issues are all considered in **Section 4.3.2.1** in the context of SPP paragraph 169. The assessment findings and submissions made there is not repeated here.

**4.4.3 Argyll and Bute Local Development Plan Supplementary Guidance 2 (ABLDPSG2)**

283. The ABLDP was adopted in December 2016 and outlines the Spatial Framework for wind energy development within Argyll and Bute. The purpose of the ABLDPSG2 is to set out in the spatial strategy for wind energy and to provide guidance to developers on how the policy criteria in the ABLDP will be interpreted by A&BC.

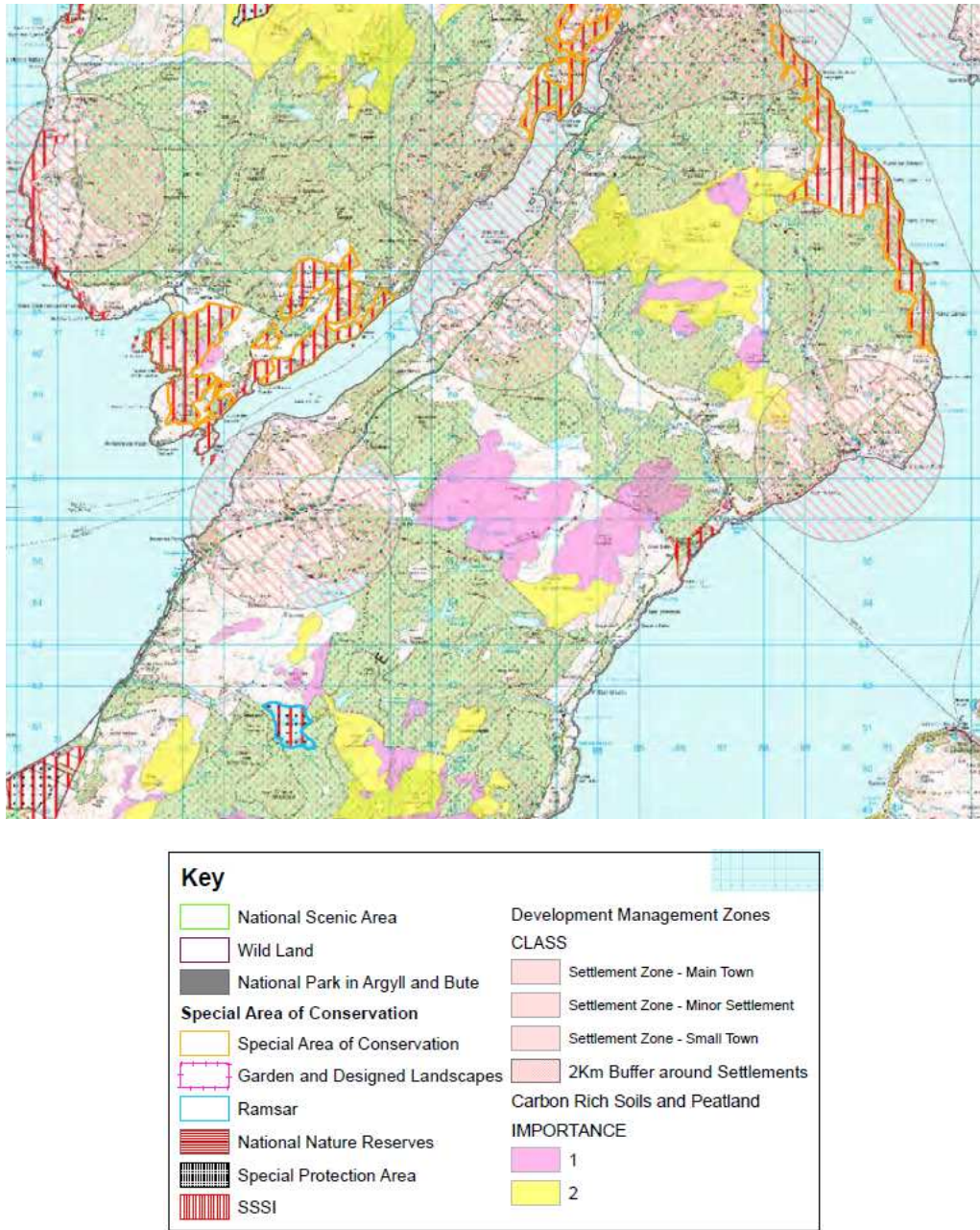


Figure 4.1 Argyll and Bute Local Development Plan Draft Supplementary Guidance: Renewable Energy - Appendix 1: Spatial Framework for wind turbines showing constituents of Group 1 and 2 Areas – Extract

**4.4.4 Review of the Proposed Development against ABLDP**

284. **Table 4.3** identifies the matters which are raised in the ABLDP that are considered to be relevant to the proposed Development. It responds in summary to the issues that are raised in the relevant policies.

Issue	Local Development Plan Reference	Response
Renewable Energy	<p>Policy LDP 6 – Supporting the Sustainable Growth of Renewables</p> <p>Policy LDP STRAT 1– Sustainable Development</p> <p>Policy LDP10 – Maximising our Resources and Reducing Our Consumption</p> <p>SG LDP Sustainable - Sustainable Siting and Design</p>	<p>The wind energy policy is supportive of windfarm developments subject to the satisfaction of specified criteria. The matters raised these criteria have been addressed in the context of SPP. The landscape capacity study is considered in the context of the ABLCS in 3.6.1.2 and in the other parts of this table.</p>
Landscape and visual impact	<p>Policy LDP 6 – Supporting the Sustainable Growth of Renewables</p> <p>Policy LDP 3 – Supporting the Protection, Conservation and Enhancement of our Environment</p> <p>Policy LDP 9 – Development Setting, Layout and Design</p> <p>Principles SG LDP ENV 9 – Development Impact on Areas of Wild Land</p> <p>SG LDP ENV 12 - Development Impact on National Scenic Areas (NSAs)</p> <p>SG LDP ENV 13 - Development Impact on Areas of Panoramic Quality (APQs)</p> <p>SG LDP ENV 14 – Landscape</p>	<p>There are a number of significant landscape and visual impacts which are identified in the EIA Report. These are reported in the context of para 169 of SPP.</p> <p>In the context of protecting the Landscape it is important to note that the proposed Development would have tangible benefits to the economy. The proposed Development is clearly justifiable in a rural location.</p> <p>It is not considered that the landscape impacts which are predicted mean that the proposed Development is not in accordance with any of the ABLDP.</p>
Woodland and Forestry	<p>Policy LDP 6 – Supporting the Sustainable Growth of Renewables</p> <p>Policy LDP 3 – Supporting the Protection, Conservation and Enhancement of our Environment</p> <p>Policy LDP10 – Maximising our Resources and Reducing Our Consumption</p>	<p>The proposed Development would result in the net loss of 50.02 hectares of developable commercial forestry. There would compensatory planting for this in line with current requirements.</p> <p>The proposed Development is considered to be in accordance with the woodland and forestry policies of the ABLDP.</p>
Historic environment	<p>Policy LDP 6 – Supporting the Sustainable Growth of Renewables</p> <p>Policy LDP 3 – Supporting the Protection, Conservation and Enhancement of our Environment</p> <p>Policy LDP 9 – Development Setting, Layout and Design</p>	<p>The design evolution of the proposed Development has had cognisance of Listed Buildings, Scheduled Monuments, Conservation Areas, Gardens and Designed Landscapes and their settings. Regard has also been had to the presence of non-designated known archaeological features.</p> <p>The proposed Development would not have a significant impact on the historic environment, either as a result of the proposed Development on its own or cumulatively. Archaeological monitoring is proposed during construction, as set out in <b>Chapter 16 Schedule of Commitments</b> of the EIA Report.</p> <p>The proposed Development is considered to be in accordance with the historic environment requirements of the ABLDP.</p>

Issue	Local Development Plan Reference	Response
Natural environment (excluding landscape)	<p>Policy LDP 6 – Supporting the Sustainable Growth of Renewables</p> <p>Policy LDP 6 – Supporting the Sustainable Growth of Renewables</p> <p>Policy LDP 3 – Supporting the Protection, Conservation and Enhancement of our Environment</p> <p>Policy LDP10 – Maximising our Resources and Reducing Our Consumption</p>	<p>The Site is not located in an international, national or local designated ecology or ornithology area. The design of the proposed Development has had due regard to the presence of ecology and ornithological features. There would be no adverse effect on protected species as a result of the proposed Development.</p> <p>The proposed Development would not have a significant impact on the natural environment, either as a result of the proposed Development on its own or cumulatively. Ecological mitigation is proposed, as set out in <b>Chapter 16 Schedule of Commitments</b> of the EIA Report.</p> <p>The proposed Development is considered to be in accordance with the natural environment requirements of the ABLDP.</p>
Traffic and transport	<p>Policy LDP 6 – Supporting the Sustainable Growth of Renewables</p> <p>Policy LDP 11 – Improving our Connectivity and Infrastructure</p>	<p>The proposed Development would not have a significant impact on traffic and transport. Mitigation is proposed during construction in the form of a TMP, as set out in <b>Chapter 16 Schedule of Commitments</b> of the EIA Report. This would seek to minimise the potential for any negative effects of road traffic.</p> <p>The proposed Development is considered to be in accordance with the traffic and transport requirements of the ABLDP.</p>
Socio economics	<p>Policy LDP 6 – Supporting the Sustainable Growth of Renewables</p> <p>Policy LDP 11 – Improving our Connectivity and Infrastructure</p> <p>Policy LDP5–Supporting the Sustainable Growth of Our Economy</p>	<p>The proposed Development would not have any significant impacts on core paths and public access. It would provide additional access within the Site itself. It would not impact upon a core path.</p> <p>The proposed Development is considered to be in accordance with the public access policy of the ABLDP.</p>
Noise	Policy LDP 6 – Supporting the Sustainable Growth of Renewables	<p>The proposed Development would not have a significant impact in respect of noise, either as a result of the proposed Development on its own or cumulatively. The proposed Development is considered to be in accordance with the natural environment requirements of the ABLDP.</p>
Hydrology and geology	<p>Policy LDP 6 – Supporting the Sustainable Growth of Renewables</p> <p>Policy LDP 3 – Supporting the Protection, Conservation and Enhancement of our Environment</p> <p>Policy LDP10 – Maximising our Resources and Reducing Our Consumption</p> <p>SG LDP ENV7- Water Quality and the Environment</p>	<p>The potential impact of the proposed Development on the water environment has been assessed. The proposed Development would not harm the water environment or its biodiversity, it would not pose an unacceptable risk to the quality of controlled waters.</p> <p>The inclusion of 5 borrow pit areas within the site layout and the approach to using material that would be won as the site is developed would help to ensure that the impacts on local communities associated with the import off aggregate to the site are minimised. The borrow pit search areas have been assessed as part of the EIA process and no significant effects have been identified.</p> <p>The proposed Development is considered to be in accordance with the hydrology and geology requirements of the ABLDP.</p>
Land use	<p>Policy LDP 6 – Supporting the Sustainable Growth of Renewables</p> <p>Policy LDP10 – Maximising our Resources and Reducing Our Consumption</p>	<p>The proposed Development would not result in the loss of prime agricultural land and therefore the proposed Development is in accordance with the ABLDP in this regard.</p>
Residential amenity	Policy LDP 6 – Supporting the Sustainable Growth of Renewables	<p>The potential impact of the proposed Development on residential amenity is considered in the context of SPP at 3.5.5.</p> <p>The proposed Development is considered to be in accordance with the residential amenity requirements of the ABLDP.</p>



Issue	Local Development Plan Reference	Response
Aviation and broadcasting	Policy LDP 6 – Supporting the Sustainable Growth of Renewables	There would be no significant impact on aviation and broadcasting as stated at 4.3.2.8.12 and 4.3.2.8.13.  The proposed Development is considered to be in accordance with the aviation and broadcasting requirements of the ABLDP.
Cumulative	Policy LDP 6 – Supporting the Sustainable Growth of Renewables  Policy LDP 3 – Supporting the Protection, Conservation and Enhancement of our Environment	The issue of significant cumulative impact as a result of the proposed Development has been considered throughout the EIA. It is reported in 4.3.2.8.4 of this Planning Statement. The proposed Development is considered to be in accordance with the cumulative requirements of the ABLDP.
Communities	Policy LDP 6 – Supporting the Sustainable Growth of Renewables	The potential positive and negative impacts of the proposed Development on communities have been considered in the commentary on SPP and in other parts of this Table. The impact on communities is not significant and is considered to be acceptable.

Table 4.3: Review of ABLDP Policies

285. For the reasons set out in **Table 4.3** and by inference in **Section 4.3.2** of this Planning Statement, it is concluded that the proposed Development is in accordance with the ABLDP.

#### 4.5 Argyll and Bute Landscape Wind Energy Capacity Study 2017

286. The Argyll and Bute Landscape Wind Energy Capacity Study 2017 (ABLWECS) considers the sensitivity of landscape character types to different sizes of wind turbine development to inform strategic planning for wind energy and some guidance when considering specific developments. The proposed Development Site is within Landscape Character Type (LCT) 6: Upland Forest Moor Mosaic. The guidance on development for this LCT states that there may be ‘very limited’ scope for Very Large turbines (over 130m).

287. Landscape Capacity Studies are strategic in nature and should not be used to determine applications without regard to the individual assessment of the proposal. This has been made clear in several appeal and Section 36 decisions including Dersaloch Windfarm (Reference EC00003172) Larbrax Windfarm (Reference PPA-170-2105 October 2016), Sorbie Windfarm (Reference AIR-NAY-001 September 2015) and Kirk Hill Windfarm (Reference PPA-370-2052, February 2017).

288. In the case of Dersaloch Windfarm (Reference EC00003172) in South Ayrshire, the site partly borders East Ayrshire. The site is within an area identified in the South Ayrshire Landscape Wind Capacity Study as an area having no capacity for turbines of greater than 70m in height. Despite submissions from East Ayrshire Council that the proposal should be refused because there was no capacity for turbines of greater than 70m, the Scottish Ministers granted consent for 16 turbines of 125m to tip and 7 turbines of 115m to tip.

289. In the decision on Larbrax Windfarm (Reference PPA-170-2015 October 2016) the Reporter was clear, at paragraph 26, that although the relevant landscape capacity study (for Dumfries & Galloway and which formed part of the adopted Supplementary Guidance) indicated there was no capacity for a windfarm development on the scale proposed at the Site, it did not oblige the decision maker to refuse planning permission. Indeed in that case the Reporter went on to uphold the appeal and grant planning permission.

290. In the case of Kirk Hill Windfarm Reference PPA-370-2052, February 2017), the Reporter allowed the appeal despite the fact that the South Ayrshire Landscape Capacity Study did not consider there to be capacity for the proposed Development.

291. In the Report to Scottish Ministers in relation to Sorbie Windfarm, North Ayrshire (Reference AIR-NAY-001; September 2015), the Reporter states that “*Landscape capacity studies can be useful tools in understanding the nature of impacts caused by wind turbines. However, I do not consider that it is appropriate to give them the attributes of detailed zonings of land for a particular number of turbines of a particular size.*” (paragraph 6.47) and that “*it would be impossible for any landscape capacity study to be able to properly anticipate all the multiple impacts of the many factors that influence the design of a wind farm. I therefore consider that the Local Review Body were correct to attach*

*more weight to a proposal specific landscape and visual impact assessment compared to the general conclusions contained in the Landscape Capacity Study” (paragraph 6.49).*

292. Similar conclusions are reached regarding a consented site adjacent to the proposed Development by the Reporter at paragraph 8 in the Eascairt Windfarm Decision Notice (Ref PPA-130-2059) The Reporter advises that *‘The Argyll and Bute Landscape Wind Energy Capacity Study of 2012 (LWECS) does not include more recent wind farm development. This document provides a strategic assessment, but must, in my view, be subject to an assessment of the actual impacts on the ground. I do not therefore consider that the study counts against the development proposed.’*

293. It is clear from these decisions by Reporters and the Scottish Ministers that Landscape Capacity Studies should not be used as a basis for decisions on individual windfarm proposals. Rather the detailed site specific assessment should be used and an assessment made of the relevant environmental and economic factors as part of the decision making process.

294. The ABLWECS Executive Summary is clear that it only considers landscape sensitivity and that there are other matters which require to be taken into account in determining the overall acceptability of a wind energy development.

295. The matter of landscape capacity is considered in the context of SPP and in this Section of this Planning Statement. The proposed Development has been carefully sited within the context of the existing Freasdale Windfarm within the core of the Kintyre peninsula, located within the Upland Forest Moor Mosaic LCT. The ABLWECS (2017) states that there may be ‘very limited’ scope for very large turbines. Whilst the ABLWECS provides a strategic level assessment to guide potential development, more weight should be given to the project specific assessment with incorporated mitigation.

#### 4.6 Scottish Government Planning Guidance

296. The Scottish Government provides advice and guidance for planning applications which has relevance to windfarm development. This Guidance is for planning applications and covers many of the issues that have been identified in the context of renewable energy policy, the Development Plan, NPF and SPP and is, therefore, not set out in this Planning Statement.

##### 4.6.1 SNH - Spatial Planning for Onshore Wind Turbines – Natural Heritage Considerations 2015

297. In June 2015, SNH published Spatial Planning for Onshore Wind Turbines – natural heritage considerations. This guidance document focuses on providing advice in developing spatial frameworks for wind energy developments. The guidance is aimed at planning authorities and, whilst the document does not set out any new policy positions or technical requirements for applicants, it does highlight the importance of natural heritage considerations and provides links to existing policy and guidance documents.

298. The design evolution process which has been carried out for the proposed Development has respected natural heritage considerations in an appropriate manner. The proposed Development is in a location which, is partially, considered as an area with the potential for windfarm development in the context of SPP Table 1 provided as Table 4.2 of this Planning Statement.

##### 4.6.2 Historic Environment Scotland Policy Statement 2019 (HESPS)

299. The HESPS contains Scottish Ministers’ policies and provides direction for Historic Environment Scotland and policy frameworks. HESPS is a policy statement directing decision-making that affects the historic environment. It is non-statutory, which means that it is not required to be followed as a matter of law or statute. It is relevant to a wide range of decision-making at national and local levels. It is a material consideration for planning proposals that might affect the historic environment.

300. HESPS sets out a number of policies and core principles which set out Historic Environment Scotland’s understanding of how the historic environment should be managed and how to apply these principles. The principles contained in the document are the fundamental ideas that underpin desirable and positive outcomes for the historic environment. The principles are the basis for the policies outlined in the document and the policies describe how the principles should be implemented

301. The EIA Report **Chapter 11 Archaeology and Cultural Heritage** has been prepared with reference to HESPS and concludes that there are no direct effects and limited effects on the settings of any cultural heritage assets arising from the construction and operation of the proposed Development.

#### 4.6.3 Scottish Government Online Guidance on Large Photovoltaic Arrays 2011

302. The Scottish Government's policy advice on large scale Solar installation is contained in online advice with regard to large photovoltaic arrays. This advice encourages planning authorities to consider the potential of solar development in further detail, with a view to "identifying large arrays of ground mounted PV as appropriate uses for certain urban and rural area development plan land allocations".
303. The guidance further identifies a number of 'typical planning considerations' which are considered likely to be relevant in determining planning applications for solar developments. These are identified as— landscape/visual impact, ecological impacts, archaeology, impact on communities, glint and glare impacts, aviation matters and decommissioning. Where appropriate these issues have all been considered within the EIA Report, no significant effects as a result of the solar development, on its own, are identified.

#### 4.7 The Balance of Issues

304. When the issues set out in **Section 4.2.** are considered in the context of National Energy and Planning Policy and Local Planning Policy it becomes clear that the focus for any decision becomes a balance between the Landscape and Visual impacts of the proposed Development as the only significant unmitigatable environmental effects against the potential benefits of the project. The proposed Development is not located within a National Park or National Scenic Area and is, therefore, not in an area where wind turbines or other forms of renewable energy are unacceptable under the terms of SPP.
305. The Site is not nationally or internationally designated, nor is it within a nationally important mapped area for wild land. The proposed wind turbines would be beyond 2 km from the nearest settlement. The closest settlements are Whitehouse (2.6 km), Clachan (2 km). The Site includes an area which is identified as priority peatland which has been carefully considered in the comprehensive design evolution process. The layout of the proposed Development incorporates embedded mitigation which has limited the impact of the proposed Development on peat. The proposed Development is considered to have an acceptable impact on peat. The minority of the Site is, therefore, considered to be a Group 2 area of significant protection.
306. Significant landscape and visual effects are an expected part of any renewable energy development featuring wind turbines. The manner in which the proposed Development has been designed has sought to avoid significant effects on the most sensitive landscapes and viewpoints. The residual significant landscape and visual effects are commensurate with the scale and nature of the proposed Development and are considered to be acceptable.
307. It is considered likely that the proposed Development would generate in the region of between 360 – 380GWh per annum (annual energy production). The promotion of renewable energy, and its supply to the national grid, would contribute towards the aim of a low carbon economy set out clearly in National Policy.
308. The scale of the proposed turbines, at 149.9 m to tip with the exception of 3 at 135 m to tip, means that potential of the Site is being maximised to its full generation potential while carefully balancing the environmental impacts.
309. A project of this scale would create local economic benefits, particularly during construction where local businesses, trades, suppliers, construction firms and hoteliers would see increased trade. The applicant is committed to offering the community the opportunity to invest in the proposed Development. The potential economic benefits, associated with the proposed Development as a result of the shared ownership process, offer valuable financial support to the community over and above the community benefits which would be made. The offer provides the community with the opportunity to invest in the future of the local area. The benefits could be used for long term investment in the local community.
310. Overall the proposed Development would have beneficial economic impacts, which include local and community socio-economic benefits such as employment and associated business and supply chain opportunities. The potential economic benefits are considered to be substantial sums of money which are demonstrable and clearly linked to the proposed Development.



311. It is submitted that the identified economic benefits would support the outcomes of National Policy on shared ownership. They have the potential to help the community become a successful, sustainable, naturally resilient and low carbon place.
312. SPP sets out a clear presumption in favour of development that contributes to sustainable economic development. Given the level of environmental effects expected from the development which have been carefully considered following design and mitigation, set against the positive outcomes which the proposed Development would demonstrably have, it is considered that the proposed Development would contribute significantly to sustainable economic development.
313. It is concluded that the proposed Development gains considerable support from both planning and renewable energy policy.

## 5 Conclusions

314. This Planning Statement has considered renewable energy policy and has identified the renewable energy targets which have been set in **Appendix 2**. **Appendix 2** identifies where Scotland is positioned in respect of meeting existing renewable energy targets. Global climate change is widely recognised as one of the greatest environmental, social and political challenges facing the world today and has been recently declared as a climate 'crisis' or 'emergency'. The proposed Development would make a meaningful contribution to the Scottish Government's uncapped target of generating the equivalent of 100% of electricity demand from renewable sources beyond 2020. While the UK Government is clear that they expect the generation of renewable energy to become more self-sufficient, Scotland continues to support the existing framework to meet ambitious targets. The viability of sites is critical to the ability to meet targets. The design process has sought to maximise the viability of the proposed Development. It has carefully considered the scale of the turbines in order to maximise the generating capacity of the proposed Development within the technical and environmental constraints that exist on the site and in the surrounding area.
315. There is a clear need to intensify the drive for renewable development production and onshore renewable energy plays an important part of meeting the renewable energy targets. Developments such as the proposed Development, which are considered to be environmentally acceptable and maximise the potential opportunity of a site, need to be consented.
316. The UK Government's objective to cut carbon emissions (at a low cost) combined with the Scottish Government's ambitious targets mean that large onshore wind sites with good wind resource, which are well located in terms of infrastructure, including grid connection, along with limited significant environmental impacts, should be developed. The proposed Development fulfils these requirements with an estimated carbon saving of as follows:
- 328,912 tonnes of CO<sub>2</sub> per year over coal-fired electricity (8.2 million tonnes assuming a 40 year lifetime for the purposes of the carbon calculator);
  - 90,658 tonnes of CO<sub>2</sub> per year over grid-mix of electricity (2.27 million tonnes assuming a 40 year lifetime for the purposes of the carbon calculator); or
  - 160,881 tonnes of CO<sub>2</sub> per year over a fossil fuel mix of electricity (4.02 million tonnes assuming a 40 year lifetime for the purposes of the carbon calculator).
317. The proposed Development is located in a site which is considered to be suitable for windfarm development in the context of Table 1 of SPP.

## 5.1 Benefits of the Proposed Development

318. The benefits of the proposed Development can be summarised as follows:



### 5.1.1 Energy Policy and Relevant Targets

319. The benefits of the proposed Development in respect of its contribution to Energy Policy and relevant targets, as well as the expected energy generation potential of the Site are set out in **Chapter 3** of this Planning Statement.

320. It is anticipated that the proposed Development would provide a valuable contribution to renewable energy and decarbonisation targets with a total installed capacity of around 134 MW and (based on currently available technologies and assuming the same supplier for all turbine positions). This means that the proposed Development would produce between 360-380 GWh of electricity annually (based on site derived capacity factors of 35.8 %). This equates to the power consumed by approximately 99,200 homes.

### 5.1.2 Economic Impacts

321. The total economic value of the renewables industry within Argyll and Bute is not known, but some data are available for the south west Scotland region. One of the most recent studies, which was undertaken in 2018 by independent renewable energy analysts, BVG Associates looked at economic benefits created by eight ScottishPower Renewables onshore windfarms in south west Scotland commissioned between 2016 and 2017. The windfarms have a combined capacity of 474 MW and would have a £1.6 billion lifetime investment, 66% of this would be in the UK. The study showed that, for these windfarms alone, investment in the local area amounted to £257 million, in addition to which

the schemes generated £297 million GVA and created 7,768 local full time equivalent (FTE) jobs. Other economic benefits include direct payment to community benefit schemes amounting to over £59 million over the 25 year lifetime of the windfarms.

322. **Chapter 14 Socio-economics, Recreation and Tourism** of the EIA Report advises that proposed Development expenditure during the construction phase is estimated to be approximately £148 million and there is expected to be a peak workforce of 150. The Scottish economy would benefit by some £230.2 million net GVA during construction. During the operational phase, based on a nominal 40 year period, the proposed Development would contribute some £60.4 million in GVA to the Argyll and Bute economy through direct, indirect and multiplier effects, and over £170 million to the economy of Scotland as a whole. This is considered to be a positive benefit of the proposed Development.

### 5.1.3 Community Shared Ownership Impacts

323. As stated in **Chapter 2** of this Planning Statement, as an integral part of the proposed Development SPR is offering the community the opportunity to invest in the proposed Development.

324. Given recognised economic uncertainty associated with onshore wind, Scottish Energy Strategy 2017 and OWPS (See **Appendix 2**) it is difficult to predict the net economic impact of the shared ownership offering from the proposed Development. However, it is recognised that it has the potential to make a valuable contribution to the local economy generally.

### 5.1.4 Community Benefit Impact

325. If consented, a Community Benefit Fund would be made available to communities in the region of the Site in addition to the £1.6 million in community benefit funding to Argyll and Bute communities that SPR has contributed to date through existing windfarm projects. The potential that this could create in the form of investment and match funding should be recognised and considered as valuable.

### 5.1.5 Other Benefits

326. In addition to the economic benefits of the proposed Development set out above the proposals include for:

- a carbon payback period of 1.6 years for the proposed Development;
- could provide a range of ancillary grid services to National Grid such energy storage which would provide back-up power to National Grid for the benefit of providing stability to the electricity supply network and meet our increasing demands for cleaner energy, a low carbon economy and provide for energy security;
- 160,881 tonnes of CO<sub>2</sub> per year over a fossil fuel mix of electricity (4.02 million tonnes assuming a 40 year lifetime for the purposes of the carbon calculator).
- the project makes efficient use of existing land and infrastructure such as tracks which limits the amount of new track required to facilitate the proposed Development;
- improves access tracks which could be used under the right to roam; and
- brings forward and increases broadleaf woodland by 26.03 ha.

## 5.2 Residual Environmental Effects

327. This Section is supported by **Section 4.3.2.1** which sets out a detailed consideration of the environmental effects of the proposed Development on a topic by topic basis, based on the criteria set out in Paragraph 169 of SPP 2014.

328. The scoping and consultation effort alongside further survey work highlighted some key issues which would require careful consideration including:

- the positioning of turbines with respect to ecological constraints;
- the positioning of turbines with respect to peat deposits onsite;
- the positioning of turbines with respect to the closest properties to the Site;
- the potential for cumulative effects;
- the composition of turbines in views from key viewpoints; and
- the manner in which the turbines would be accommodated in and respect the landscape into which they would be placed.

329. These issues have been carefully considered alongside technical and economic matters including:
- spacing turbines appropriate to the swept rotor area so they would capture the wind efficiently as an array,
  - the size of turbines and energy generation potential to make an economic Site;
  - the need to create cost efficient road access to turbine positions; and
  - the manner in which to treat forestry onsite to minimise felling requirements for the proposed Development.
330. Environmental and technical factors as well as advice from consultees and members of the public continually fed into the design process. Taking all these main issues into account a final design for the proposed Development was agreed which could be subject to final EIA.
331. The EIA considered the effects of the proposed Development on a topic by topic basis. Its purpose was designed to expose the potential for significant environmental effects from the proposed Development and thereby understand the need for mitigation, where required or possible, concluding with an understanding of what residual effects would be. The conclusions of the EIA are presented by independent consultants in the EIA Report which accompanies the application. The findings in the EIA Report identify the required mitigation as integral to the proposed Development. The findings of the EIA Report are set out in brief in **Table 5.1** which summarises the findings of the EIA Report.

Topic	Summary of Mitigation	Residual Environmental Effect
Landscape	<ul style="list-style-type: none"> <li>• Design</li> </ul>	Limited significant effects
Visual	<ul style="list-style-type: none"> <li>• Design</li> </ul>	Limited significant effects
Ecology	<ul style="list-style-type: none"> <li>• Design</li> <li>• Pre-Construction Surveys</li> <li>• Construction Environmental Management Plan</li> <li>• Species Protection Plan</li> <li>• Bat Mitigation and Monitoring Plan</li> <li>• Peat restoration through Habitat Management Plan</li> </ul>	Not significant
Ornithology	<ul style="list-style-type: none"> <li>• Design</li> <li>• Pre-Construction Surveys</li> <li>• Construction Environmental Management Plan</li> <li>• Bird Protection Plan</li> <li>• Rafts for Red Throated Diver</li> </ul>	Not significant
Soils, Geology and the Water Environment	<ul style="list-style-type: none"> <li>• Design</li> <li>• Water quality monitoring</li> <li>• Construction Environmental Management Plan</li> <li>• Peat Management Plan</li> <li>• Construction Methodology Statement (CMS)</li> <li>• Pollution Prevention Plan (PPP) (including monitoring, as appropriate);</li> <li>• Site Waste Management Plan (SWMP); and</li> <li>• Water Management Plan (WMP).</li> </ul>	Not significant
Forestry	<ul style="list-style-type: none"> <li>• Compensatory Planting</li> </ul>	Not significant
Cultural Heritage and Archaeology	<ul style="list-style-type: none"> <li>• Design</li> <li>• Monitoring</li> </ul>	Not significant
Noise and Vibration	<ul style="list-style-type: none"> <li>• Design</li> <li>• Construction Environmental Management Plan</li> <li>• Conditions covering operational noise</li> </ul>	Not significant

Topic	Summary of Mitigation	Residual Environmental Effect
Site Access, Traffic and Transport	<ul style="list-style-type: none"> <li>Construction Environmental Management Plan</li> <li>Traffic Management Plan</li> </ul>	Not significant
Socio-economic, Tourism and Recreation	<ul style="list-style-type: none"> <li>None</li> </ul>	Not significant
Aviation	<ul style="list-style-type: none"> <li>Use of aviation lighting for CAA</li> <li>Use of aviation lighting for MOD</li> </ul>	Not significant
Other Environmental Issues	<ul style="list-style-type: none"> <li>Design</li> <li>Construction Environmental Management Plan</li> </ul>	Not significant

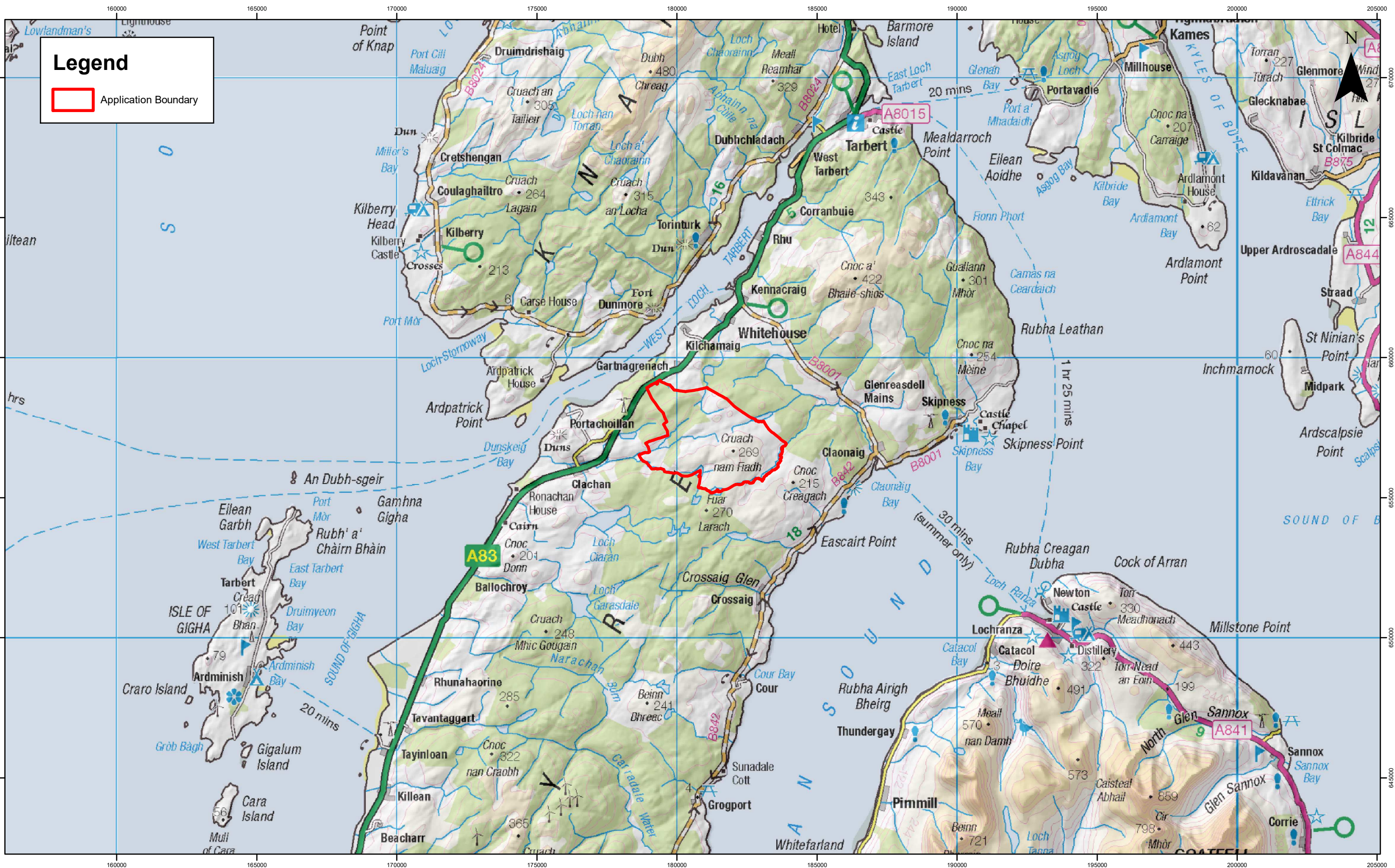
Table 5.1: Summary of Environmental Effects

293. The EIA Report sets out a number of mitigation measures, including embedded mitigation as part of the design process and the inclusion of a CEMP, should consent be forthcoming. As a result, the proposed Development would not result in any significant adverse effects on biodiversity, traffic and transportation, aviation and defence, noise and residential amenity. In addition to this there is the potential for economic benefits to arise as a result of the proposed Development.
294. The proposed Development has the potential to make a valuable contribution to the targets that have been set by the Scottish Government for the production of renewable energy and reduction of carbon emissions. The proposed Development would also make valuable community and socio-economic benefits which are described in this Planning Statement.
295. The national planning policy is supportive of the proposed Development. The proposed Development is considered to be acceptable when assessed against the criteria set out in SPP at paragraph 169. In the context of the ABLDP it is concluded that the proposed Development is acceptable. In reaching this conclusion regard has been had to the potential for significant effects on the identified criteria. The proposed Development is considered to be in accordance with the Development Plan.
296. The proposed Development has addressed the criteria set out in Schedule 9 of the 1989 Act taking into account other policy considerations including the relevant Development Plan. On this basis, it is requested that the S.36 consent is granted and deemed planning permission is forthcoming in order that the benefits identified in this Planning Statement can be delivered

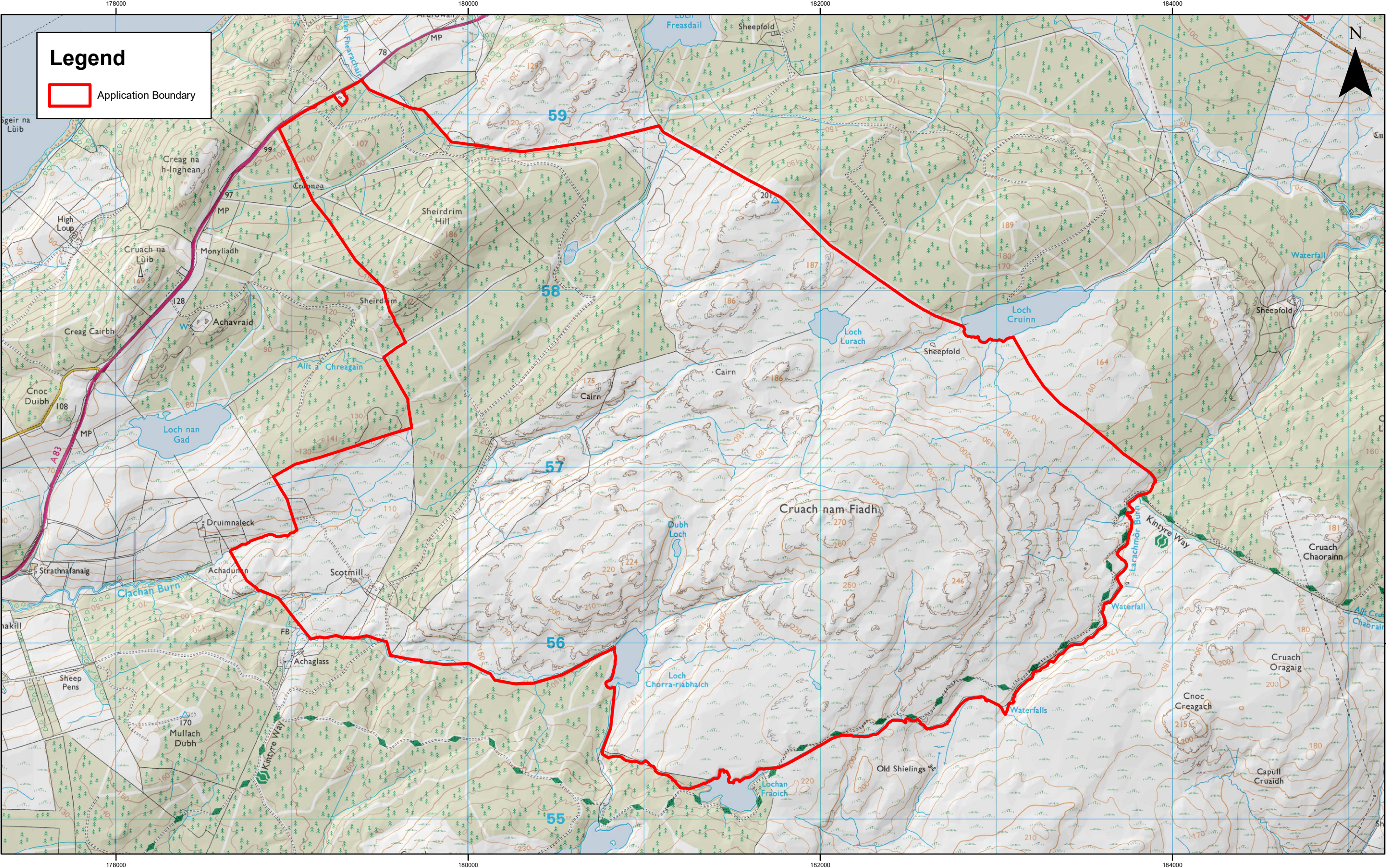



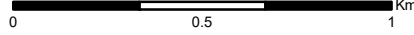
# Figures









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