

RWE

Clachaig Glen Wind Farm

Planning Statement



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1. Application Overview

1.1 Introduction

- 1.1.1 This Planning Statement has been prepared by AECOM on behalf of RWE Renewables UK Onshore Wind Ltd (formerly known as E.ON Climate & Renewables UK Developments Ltd) (hereafter referred to as '**the Applicant**'). The Applicant is proposing to develop a wind farm and battery storage site near Muasdale on the Kintyre Peninsula in Argyll and Bute, to be known as Clachaig Glen Wind Farm (hereafter referred to as the '**Proposed Development**').
- 1.1.2 The application for consent ('**Section 36 Application**') for the Proposed Development is made to the Energy Consents Unit (ECU) under Section 36 of the Electricity Act 1989, as amended (hereafter referred to as '**the Act**'), as the generating capacity of the Proposed Development will be in excess of 50 megawatts (MW).
- 1.1.3 The Proposed Development is located approximately 20 kilometres (km) to the north of Campbeltown, 1.8km north east of the small hamlet of Muasdale and 3.7km south east of Tayinloan. The general site location (hereafter referred to as the '**Development Site**') is shown on Figure 1.1: Site Boundary Plan (Environmental Impact Assessment Report (EIAR) Volume 2b).

1.2 Purpose of Planning Statement

- 1.2.1 This Section 36 Application has been prepared in accordance with the requirements of the Act and is submitted to the Energy Consents Unit (ECU) of the Scottish Government. The ECU are also requested to make a direction that planning permission is deemed granted under Section 58 of the Town and Country Planning (Scotland) Act 1997 (as amended).
- 1.2.2 As per the ECU's *Good Practice Guidance* (2013), the purpose of this Planning Statement is to describe how the Proposed Development responds to local and national planning policy.
- 1.2.3 The Planning Statement is one of a wider suite of reports and documents submitted with the Section 36 application for the Proposed Development, as illustrated through Image 1-1. The Planning Statement draws on the findings of, and should be read in conjunction with, the EIAR.

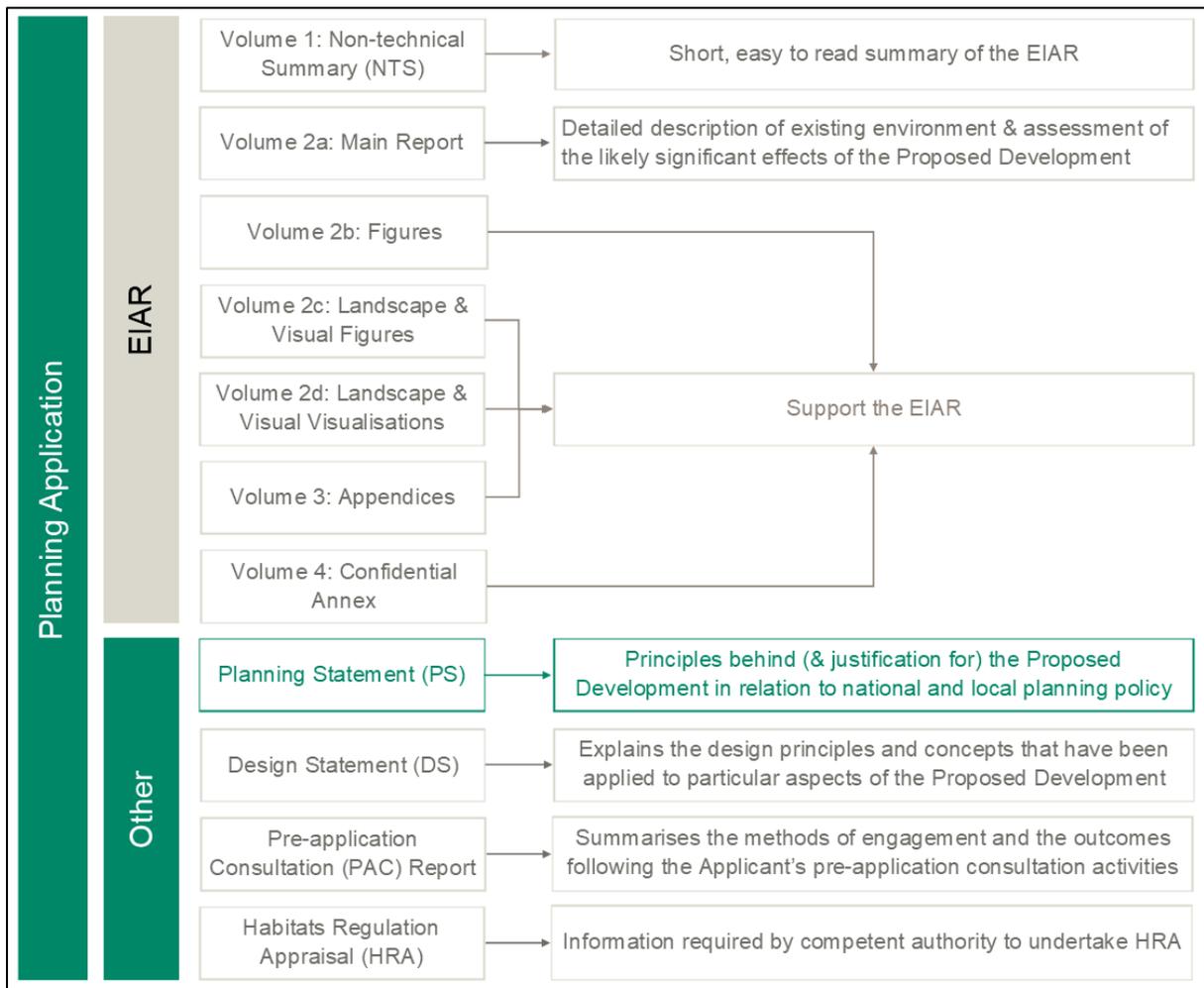


Image 1-1 Key Documents for a Section 36 Application

1.3 Structure of Report

1.3.1 The focus of this Planning Statement is on how the Proposed Development responds to national (Section 5) and local (Section 6) planning policy. Prior to this however, the background of the project is reviewed (Section 2) and the route to consent for the Proposed Development explained (Section 3). Consideration is then given to the overall need for onshore wind, as recognised through international and national legislation and guidance (Section 4).

2. Project and Site Context

2.1 Introduction

- 2.1.1 This section provides an overview on the Applicant and Forestry and Land Scotland (FLS; the landowner of the Development Site) in order to establish the reasoning behind the Proposed Development and its location.
- 2.1.2 Detail on the Proposed Development is also provided in this section of the Planning Statement, in addition to a summary of the planning history of the Development Site.

2.2 Development History

- 2.2.1 In December 2019, the Applicant gained planning permission under Section 47 of the Town and Country Planning (Scotland) Act 1997 (as amended) for a 47.6 MW wind farm at the Development Site (**'the Consented Development'**). This was through appeal to Scottish Ministers (reference PPA-130-2064).
- 2.2.2 The Consented Development comprises 14 wind turbines (13 with a blade tip height of up to 126.5m and one with a blade tip height of up to 115.5m) and associated infrastructure. The Consented Development does not incorporate co-located battery storage.
- 2.2.3 The Department for Planning and Environmental Appeals (DPEA) Report to Scottish Minister's as part of the appeal decision (ref: PPA-130-2064) recognised that the Consented Development "*accords overall with the relevant provisions of the development plan and would benefit from the presumption in favour of development that contributes to sustainable development*". There were no other material considerations which the appointed reporter or the Scottish Ministers considered would justify the refusal of planning permission.
- 2.2.4 Due to the advancement of wind turbine technology, subsequent design modifications and significant changes to the wider economics of onshore wind farms and other renewable technologies in Scotland, the Applicant is submitting this Section 36 Application to construct and operate a 12-turbine wind farm and battery storage facility with a generating capacity in excess of 50 MW on the site of the Consented Development.
- 2.2.5 The Proposed Development is an opportunity to optimise the use of the Development Site, by providing a materially greater renewable energy contribution with fewer turbines, whilst additionally helping to balance electricity demand and supply, adding resilience to the energy system, through the incorporation of co-located battery storage capability. (See Section 2.5)

2.3 RWE Renewables UK Onshore Wind Ltd

- 2.3.1 The Applicant is the same legal entity that sought and holds the benefit of the planning permission for the Consented Development, however the company name has changed from E.ON Climate & Renewables UK Developments Ltd, further to the acquisition of the E.ON renewables business by RWE on 30 September 2019, which resulted in the original applicants name changing to RWE Renewables UK Onshore Wind Ltd.
- 2.3.2 The Applicant produces electricity from renewable energy sources and has become a “super player” in the field of renewables, being the global number two in offshore wind. It has a goal to become climate-neutral by 2040. In order to achieve this goal, it is reducing its carbon dioxide (CO₂) emissions as quickly and drastically as possible by phasing out or converting conventional power plants (RWE, 2019, 2021a, 2021b).
- 2.3.3 The Applicant will also be looking to source match funding to any investment it makes into renewables projects which help to meet its carbon goals, thereby allowing a quicker path to its CO₂ targets. Therefore, for the Proposed Development, in this instance, there is an ability for the FLS landowner and the local community to invest in this scheme, as was the case with the Consented Development. This is one of the key arrangements agreed with FLS when developing the Consented and Proposed Developments.

2.4 Forestry and Land Scotland (FLS)

- 2.4.1 The majority of the Development Site is run by FLS, who manage Scotland's National Forest Estate (NFE) (including the Development Site) on behalf of the owner, Scottish Ministers. FLS is working to develop the renewable wind power potential of the NFE and increase the contribution and response of Scottish forestry to the challenges of climate change.
- 2.4.2 FLS is aiming to ensure that the potential of the NFE for renewable energy is developed and managed in ways that:
- Contribute to the Scottish Government’s renewable energy target,
 - Improve financial returns from Scotland's NFE,
 - Secure benefits for local communities, and
 - Achieve a reasonable and sustainable balance with other FLS objectives.

Site Selection

- 2.4.3 Between 2009 and 2011, FLS invited applications from developers wishing to develop wind projects on the NFE. As a result, FLS is working with a number of energy developers to build wind projects on the NFE. FLS awarded the Applicant the right to explore the potential for new wind energy projects on two areas of land: The Northern Forest Area and the Western Forest Area.

- 2.4.4 The Proposed Development is located in the West Argyll Forest District. As detailed in the Design Statement, a separate document accompanying the Section 36 Application for the Proposed Development (see Image 1-1), the Applicant considered a range of technical, environmental, planning and commercial factors in order to identify the Development Site as having the potential to support a viable wind farm development.
- 2.4.5 This included developing a viewshed analysis, which models visual receptors in an area (such as residential properties, landscape designations, differing roads types, etc.). A level of importance is assigned to these visual receptors to ensure that the process accounts for the differing sensitivities and value or significance (in planning terms) of receptors. The RWE designed process then assesses, on a regional basis, the characterised environmental sensitivities to identify areas with the lowest potential visual impact for wind farm development within that region. This process is continually updated and developed to reflect environmental and policy changes, and the evolving cumulative baseline of other developments, in particular wind development.
- 2.4.6 This viewshed analysis has been used a number of times by RWE, first to identify the potential wind farm opportunities within Argyll and Bute, one of which was the Development Site. It was then used to further assess the impacts of the Development Site prior to the completion of the first wind farm design on the site. Following the granting of planning permission for the Consented Development, it was used again to review the best opportunities within Argyll and Bute for larger-scale turbines in order to ensure that the Development Site remained the most appropriate location to operate a wind farm of this size and scale, which it concluded was the case. Further detail on this is provided in the Design Statement.

2.5 Proposed Development

- 2.5.1 The Design Statement provides detail on the history of the eleven design review stages leading to the Proposed Development, starting at 53 turbines in 2013 and including the Consented Development.
- 2.5.2 The Development Site boundaries for the Consented and Proposed Developments are almost identical, except for the access track leading from the A83 to the main Development Site, a small section to the east of the Development Site excluded at the request of Forestry and Land Scotland (FLS) and a new temporary turbine laydown area on the opposite (western) side of the A83 to the Development Site (see Figures 1.2: Consented Development, 1.3: Site Location Plan, 1.4: Site Access leading to Main Development Site, and 1.5 Site Access and Turning Circle (EIAR Volume 2b)).
- 2.5.3 The Proposed Development comprises up to 12 wind turbines (two less than the Consented Development), a battery storage facility (expected maximum 30 MW) that was not part of the Consented Development and associated infrastructure. An operational period of 35 years is sought, which comprises an additional 10 years of renewable energy generation in comparison to the Consented Development (the operational period is 25 years for the

- Consented Development). Further detail on the Proposed Development can be found in Chapter 3: 'Project Description' of the EIAR (Volume 2a).
- 2.5.4 Chapter 2: 'Approach to EIA' of the EIAR (Volume 2a) includes information relating to the consideration of potential risk from fire regarding the proposal to include battery storage onsite. While the closest residential property to the battery compound is approximately 2km distant, the risk of fire is included in the Renewable UK Onshore Wind Health and Safety Guidelines (2015) and must be considered from a Health and Safety perspective. This risk can be appropriately mitigated through consultation with both the fire brigade and Health and Safety Executive (HSE). Additionally, it is proposed that a Fire Safety Plan be produced prior to the commissioning of the battery storage facility, with the requirement for its production attached as a condition of any future consent.
- 2.5.5 Five of the turbines within the Proposed Development would have a maximum blade tip height of 200m, whilst the remaining seven would have a maximum tip height of 185m. All would have a maximum rotor diameter of 155m. This is an increase from the 126.5m maximum tip height in the Consented Development.
- 2.5.6 Due to the increased height of turbines, some turbines will require hub-mounted obstruction lights. Eight turbines will require visible-red and eight will require infra-red lights (nine turbines lit in total). A lighting strategy has been developed with an aviation specialist in order to assess any potential effects (see Chapter 16: 'Aviation Safeguarding' of the EIAR (Volume 2a)). Chapter 16 (Aviation Safeguarding) and Chapter 7 (Landscape and Visual) of the EIAR (Volume 2a) detail that aviation lighting has been designed to minimise potential visibility, principally through a reduction in the numbers of lights proposed. The use of aviation obstruction lighting with a direction beam will reduce the apparent intensity of the lighting, particularly from lower lying locations such as Gigha and in close proximity to the Proposed Development. It is proposed that the use of directional aviation lighting will be attached as a condition to any future consent.
- 2.5.7 Chapter 1: 'Introduction' of the EIAR (Volume 2a) provides a full comparison of the Consented and Proposed Developments.
- 2.5.8 In order to provide consistency when discussing and comparing variations to the differing turbine layouts (i.e. Consented verses Proposed), the turbine numbering established for the Consented Development has been retained for the Proposed Development, with turbines T9 and T12 being the two turbines that have been removed.
- 2.5.9 A key addition to the Proposed Development is the addition of battery storage facilities. This in itself reflects a response to Scottish Government policy evolution which seeks to maximise the role of onshore wind in meeting Scotland's energy decarbonisation ambitions. The 2017 Onshore Wind Policy Statement (discussed in Section 4 of this Planning Statement) acknowledges that the continuing development of onshore wind will "*require developers to continue to reduce costs and increase innovation – for example, taking advantage of*

increasing opportunities to combine wind generation with energy storage” (Scottish Government, 2017a).

- 2.5.10 The draft 2021 ‘Onshore Wind Policy Statement Refresh’, which was released in October 2021 for consultation, boosts support for battery storage, stating “*on-site battery storage not only removes pressures from the grid, but enables more locally focussed energy provision, and reduces costs to consumers. The Scottish Government will continue to support the co-location of both battery storage and hydrogen production facilities with onshore wind developments to help balance electricity demand and supply, add resilience to the energy system and support the production of green hydrogen to meet our future demands” (Scottish Government, 2021a).*
- 2.5.11 The proposed increase in turbine size and the addition of battery storage would result in an almost 100% increase in output from the Proposed Development in comparison to the Consented Development.
- 2.5.12 In addition to the 12 wind turbines and battery storage facility, the Applicant is applying for Section 36 consent for ancillary infrastructure, including access tracks, passing places, turning areas, underground cabling, crane hardstandings, a permanent anemometer mast (up to 110m height), a control building and substation compound, a temporary construction compound (which towards the end of the construction period would be used for the battery storage facility), a concrete batching plant and six small temporary quarries (borrow pits). A detailed description of the Proposed Development is set out in Chapter 3: ‘Project Description’ of the EIAR (Volume 2a).

2.6 Comparison of Effects of Consented and Proposed Developments

- 2.6.1 Table 2-1 compares the significant environmental effects determined through the EIAR for the Proposed Development (as summarised in Chapter 19: ‘Summary of Effects and Conclusions’ (EIAR Volume 2a) and the 2016 EIA (and associated appeal process) carried out as part of the Consented Development.

Table 2-1 Proposed Development and Consented Development: EIAR Conclusions

EIAR Chapter	Proposed Development	Consented Development	Commentary
Chapter 7 Landscape and Visual Assessment	<p>A limited number of significant residual effects were identified as follows:</p> <ul style="list-style-type: none"> • Landscape receptors during construction, operation and decommissioning: localised moderate significant effect on one Landscape Character Type (LCT 6: Upland Forest Floor Mosaic) within 2km of the Proposed Development, with effects on the wider extent of the LCT not significant. This reflects effects on one of 14 LCTs and seascape units within the study area. • Visual receptors: Of the 25 viewpoints assessed within the Landscape and Visual Impact Assessment (LVIA), significant visual effects were predicted to be experienced at six. The six include one location on the Kintyre Way (VP13: Kintyre Way north of Development Site), which is considered likely to experience a moderate significant effect during construction and decommissioning, and a major significant effect during operation. Other significant effects are considered likely during operation only and include a core path (VP16: North Muasdale) within relatively close proximity to the Proposed Development, and on or near Gigha (VP8: Ardminish, VP9 South Pier, VP10: Sound of Gigha 	<p>A limited number of significant residual effects were identified as follows:</p> <ul style="list-style-type: none"> • Operation: localised moderate effect on one Landscape Character Type (LCT 6: Upland Forest Floor Mosaic) within 2 km of the Development Site, with effects on the wider extent of the LCT, minor and not significant. • During operation, significant effects on views from six (of thirty) viewpoints assessed, one settlement and four routes: Moderate effects on views from four viewpoints (VP 1: Kintyre Way north of the Development; VP 6: Sound of Gigha, recreational watercraft, west of Muasdale; VP 12: Sound of Gigha, Gigha Ferry; and VP 14: Gigha South Pier) and four routes (Tayinloan to Gigha Ferry, Core Paths C293, C095/96 and C539); major-moderate effects on views from two viewpoints (VP 2: North Muasdale; and VP 15: Ardminish, Isle of Gigha) and one settlement (Ardminish). • For Cumulative Scenario One (existing and consented) significant cumulative landscape effects may occur on a localised area of one LCT (LCT 6: Upland Forest Floor Mosaic) and significant cumulative visual effects may occur 	<p>The results of the 2016 EIA and Chapter 7 of the EIAR (Volume 2a) are largely comparable.</p> <p>The Proposed Development would however see the maximum tip height increase from the Consented Development, yet with two less turbines. The proposed increase in turbine size and the addition of battery storage would however result in an almost 100% increase in output from the Proposed Development.</p> <p>Chapter 1: Introduction (EIAR Volume 2a) provides a full comparison of the Consented and Proposed Developments.</p> <p>The Report to the Scottish Government of 14 October 2019 (PPA-130-2064) presented the Reporter's recommendation to approve the application for the Consented Development. With regard to the residual effects identified, the report stated:</p> <p><i>“Overall, we have concluded that there are relatively few significant landscape and visual impacts. Where they occur, they are not unexpected or overly dominant for a commercial scale wind farm”</i> (Paragraph 10.19).</p>

EIAR Chapter	Proposed Development	Consented Development	Commentary
	<p>from Gigha Ferry and VP15: Sound of Gigha from recreational watercraft). Moderate effects are anticipated at all of these viewpoints.</p> <ul style="list-style-type: none"> The cumulative baseline scenarios utilised in Chapter 7 (EIAR Volume 2a) would see the introduction of a number of additional wind farms, primarily within the upland interior of Kintyre. This would reinforce wind farms as an existing characteristic of the Upland Forest Moor Mosaic LCT and existing feature of views from many of the viewpoint locations. Significant cumulative effects on landscape character and visual receptors would largely be similar to significant non-cumulative effects discussed above. The exception being VP16, where significant cumulative effects are not anticipated due to the absence of visibility of cumulative schemes from this location. 	<p>at four viewpoints (VP 1, VP 12, VP 14 and VP 15), one settlement (Ardminish) and two routes (Tayinloan to Gigha Ferry and Core Path C095/96). For Cumulative Scenario Two (existing, consented and application stage wind farms) significant cumulative landscape effects may occur on a localised area of one LCT (LCT 6: Upland Forest Floor Mosaic) and significant cumulative visual effects on one viewpoint (VP15), one settlement (Ardminish) and one route (Core Path C293).</p>	<p>Paragraph 10.33 states “...we conclude that the proposal should be considered acceptable in terms of its landscape and visual impact, including cumulative impact.”</p> <p>The LVIA for the Proposed Development concludes that although there would be some localised significant effects upon a small number of receptors within close proximity to the Proposed Development, the effect of the Proposed Development on the landscape and visual resource of the wider area is not considered to be significant.</p>
Chapter 8 Noise	No significant effects predicted.	No significant effects predicted.	
Chapter 9 Ecology	Moderate (beneficial) Significant effects are predicted as a result of the implementation and financing of restoration of 56.2 ha forestry to blanket bog in line with the updated Carradale Land Management Plan (LMP) (FLS, <i>unpublished</i>) and FLS restoration standards.	No significant effects predicted.	Note that in the absence of the Proposed Development, the peatland restoration would likely still be carried out by FLS, however if the Proposed Development is consented, then the Applicant will finance the restoration.

EIAR Chapter	Proposed Development	Consented Development	Commentary
	<p>As part of the Proposed Development, a Habitat Management Plan (HMP) will be produced. The primary components will be the provision of compensatory blanket bog restoration, borrow pit restoration, and the provision of compensatory tree planting for limited broadleaved woodland loss associated with the lower part of the access track from the A83, and habitat protection measures.</p>		
Chapter 10 Ornithology	No significant effects predicted.	No significant effects predicted.	
Chapter 11 Geology, Hydrology and Hydro- geology	No significant effects predicted.	No significant effects predicted.	
Chapter 12 Archaeology and Cultural Heritage	No significant effects predicted.	No significant effects predicted.	
Chapter 13 Socio- Economics and Tourism	No significant effects predicted.	No significant effects predicted.	

EIAR Chapter	Proposed Development	Consented Development	Commentary
Chapter 14 Traffic, Transport and Access	No significant cumulative effects predicted following the implementation of mitigation, namely a Construction Traffic Management Plan (CTMP).	No significant effects predicted.	The traffic, transport and access assessment for the Proposed Development assumes all construction traffic appears on all road links within the study area. In practice, the CTMP will assign, route and manage development traffic to meet specific needs. Accordingly, it will not be the case that all traffic appears on all study areas road links, and as such this assessment represents a very robust forecast of potential environmental effects. In addition, the assessment assumes no borrow pits within the Development Site will be used for the provision of material, which is very unlikely to be the case. The use of the borrow pits could reduce forecast construction HGV traffic on the public highway by up to 75%.
Chapter 15 Infra- structure and Tele- communicati ons	No significant effects predicted.	No significant effects predicted.	
Chapter 16 Air Safe- guarding	No significant effects predicted.	No significant effects predicted.	

EIAR Chapter	Proposed Development	Consented Development	Commentary
Chapter 17 Forestry	No significant effects predicted.	No significant effects predicted.	
Chapter 18 Shadow Flicker	No significant effects predicted.	No significant effects predicted.	

3. Route to Consent

3.1 Introduction

3.1.1 This section summarises the key legislation relevant to the consenting process and the planning history of the Development Site.

3.2 The Electricity Act 1989

3.2.1 The Proposed Development is classified as a generating station, which requires consent from Scottish Ministers to operate under Section 36 of the Act as it will have a capacity of more than 50MW.

3.2.2 The following Schedules of the Act are also applicable:

- Schedule 8:
 - Sets out the key requirements for an application for consent. This includes that a site map should be provided, illustrating the location of any proposed generating station (see Figure 1.3: Site Location Plan; EIAR Volume 2b),
 - Ensures that the relevant planning authority will be involved in the application for consent (in this instance, Argyll and Bute Council). Notice is served to the planning authority as part of the application process and an opportunity is provided for them to submit their appraisal of the project, and
 - Provision is also given to other consultees and members of the public to submit comments on the proposal.
- Schedule 9 (3) states that applications for Section 36 consent will be considered with regard to:
 - *“the desirability of preserving natural beauty, of conserving flora, fauna and geological or physiographical features of special interest and of protecting sites, buildings and objects of architectural, historic or archaeological interest; and*
 - *[the Applicant] shall do what he reasonably can to mitigate any effect which the proposals would have on the natural beauty of the countryside or on any such flora, fauna, features, sites, buildings or objects.”* These topics are referred to in Sections 5 and 6 of this Planning Statement and in detail through the EIAR.

3.3 Town and Country Planning (Scotland) Act 1997 (as amended)

- 3.3.1 Section 57(2) of the Town and Country Planning (Scotland) Act 1997 as amended (**'the Planning Act'**), states that Scottish Ministers can, on granting Section 36 consent, give a direction for planning permission to be deemed granted (subject to any conditions specified in the direction).
- 3.3.2 This application to Scottish Ministers for the Proposed Development therefore requests deemed planning permission in addition to Section 36 consent.
- 3.3.3 Due to the regulatory consenting process for Section 36 applications, the Planning Act is not engaged beyond Section 57(2) and therefore primacy is not given to, for example, the local development plan (Section 25) or pre-application consultation (PAC) (Sections 35A-C).
- 3.3.4 Nevertheless, relevant policy in the local development plan is a material consideration for Scottish Ministers who take the consultation response from the planning authority into account when determining Section 36 applications. In addition, PAC has taken place for the Proposed Development as detailed in the submitted PAC Report.

Status of the Development Plan

- 3.3.5 The development plan comprises the Argyll and Bute Local Development Plan (**'the LDP'**). It should be recognised that as the plan was adopted in March 2015, it now exceeds the recommended lifespan of five years for a development plan. It is acknowledged that Argyll and Bute Council are currently in the process of preparing a new development plan due for adoption in 2023. This is discussed in Section 6 of this Planning Statement.
- 3.3.6 Scottish Planning Policy (SPP) (Scottish Government, 2014a) is, at a minimum, a material consideration in this application, and it contains a presumption in favour of development that contributes to sustainable development and this is discussed further in Section 5 of this Planning Statement.
- 3.3.7 As such, although the LDP remains a material consideration for the purposes of considering the Section 36 Application, owing to the age of the LDP, the presumption in favour of development that contributes to sustainable development established through SPP is a significant material consideration in this case (see paragraph 33 of SPP). This is discussed further in Section 5 of this Planning Statement.

3.4 The Electricity Works (EIA) (Scotland) Regulations 2017

- 3.4.1 The Electricity Works (Environmental Impact Assessment) (Scotland) Regulations 2017 (**'the EIA Regulations'**), apply to Section 36 applications.
- 3.4.2 This Proposed Development requires an EIA under Schedule 2(1) of the EIA Regulations, as it will have an installed capacity of more than 50 MW and is considered likely to have potentially significant effects on the environment; it is therefore considered an 'EIA development'.
- 3.4.3 Regulation 3 of the EIA Regulations stipulates that Section 36 consent cannot be granted by Scottish Ministers for an EIA development unless an EIA has been conducted for that development and the environmental information is taken into account by the Scottish Ministers.
- 3.4.4 The EIA conducted for the Proposed Development has been designed to comply with the EIA Regulations, as is further detailed in Chapter 2: Approach to EIA (EIAR Volume 2a).

3.5 Planning History

- 3.5.1 With the exception of the Consented Development introduced in Section 2.2 of this report, there is no previous planning permission granted for development within the Development Site, except for the temporary anemometer mast which has been erected by the Applicant. FLS currently have permitted development rights over the site for their forestry operations..
- 3.5.2 As part of the EIAR, and detailed within Chapter 2: Approach to EIA (EIAR Volume 2a), an initial cumulative search area of 60km from the Proposed Development was utilised for the identification of a long list of other existing, consented and application stage wind farms. A number of existing wind farms are present along the Kintyre peninsula, including Auchadaduie, Beinn an Tuirc I-II, Cour, Deucheran Hill, Freasdail, and Tangy I and II. In addition, Blary Hill, Beinn an Tuirc III are under construction (as of October 2020). A number of other schemes have been consented but are yet to be constructed, including Airigh, Eascairt, High Constellation, and Tangy IV (repowering of the existing Tangy I and II).
- 3.5.3 Among those in closest proximity to the Proposed Development, just under 1 km to the north-east, is Deucheran Hill Wind Farm (15.75MW) which has been operational since 2001. The operational Beinn an Tuirc I (30MW) is situated approximately 4.6km south of the Proposed Development. Auchadaduie Wind Farm (6.9MW), also located to the south (approximately 5.1km) was approved for development in 2015 and is operational.
- 3.5.4 Blary Hill Wind Farm (28MW) is located approximately 5km to the south of the Proposed Development and is currently under construction.

- 3.5.5 The proposed site of Narachan Wind Farm (95MW) is located approximately 4km north of the Proposed Development and is currently awaiting determination (<https://www.energyconsents.scot/ApplicationDetails.aspx?cr=ECU00001884&T=5>).

Overview of Appeal of Consented Development

- 3.5.6 In December 2019, the Applicant gained approval under section 47 of the Planning Act for the Consented Development through appeal to Scottish Ministers. The *Report to the Scottish Government* of 14 October 2019 (reference: PPA-130-2064) presented the Reporter's recommendation to approve the application for the Consented Development.
- 3.5.7 The planning application (16/01313/PP) was originally refused permission by Argyll and Bute Council following consideration of the application by the Council's Development and Infrastructure Services Committee on 20 September 2017. The reasons for refusal were set out in the decision notice (21 September 2017) and were summarised within the Argyll and Bute Council Committee Planning Application Report and Report of Handling: *"the proposal is considered contrary to government policy expressed in SPP; adopted Local Development Plan policy and associated Supplementary Guidance, and guidance published by the Council in the 'Argyll & Bute Landscape Wind Energy Capacity Study'; insofar as it does not reinforce the established pattern of wind farm development in Kintyre without giving rise to unacceptable landscape, visual and cumulative impacts."*
- 3.5.8 The decision for refusal was therefore made on landscape and visual grounds alone, with all other considerations deemed to be acceptable by Argyll and Bute Council. Ultimately, as detailed in Table 2-1 previously, the Reporter's examination of landscape and visual impacts (PPA-130-2064) *"concluded that there are relatively few significant landscape and visual impacts. Where they occur, they are not unexpected or overly dominant for a commercial scale wind farm"* (Paragraph 10.19).
- 3.5.9 Furthermore, Paragraph 10.33 states *"...we conclude that the proposal should be considered acceptable in terms of its landscape and visual impact, including cumulative impact."*
- 3.5.10 The Reporter's overall conclusions on the application were as follows: *"We therefore conclude, for the reasons set out in this report, that the proposed development accords overall with the relevant provisions of the development plan and would benefit from the presumption in favour of development that contributes to sustainable development. There are no other material considerations which we consider would justify the refusal of planning permission"*. The Consented Development was therefore clearly considered commensurate with local and national policy.
- 3.5.11 The appeal decision granting planning permission for the Consented Development is a material consideration and establishes the general suitability of the site, in perpetuity, for commercial-scale wind farm development. While it is acknowledged that, when compared, the Proposed Development differs from the Consented Development, the existing permission held by the Consented Development evidences that the receiving environment of the Development

Site has previously been deemed to be capable of facilitating large-scale energy generation in the form of a commercial scale wind farm.

EIA Scoping

- 3.5.12 The Clachaig Glen Wind Farm Section 36 Scoping Report was submitted to the Scottish Government ECU in July 2020, with the Scoping Opinion received in October 2020. The Applicant voluntarily submitted an EIA Scoping Report under Regulation 7 of the EIA Regulations.
- 3.5.13 Chapter 5: Summary of Consultation (EIAR Volume 2a) summarises the outcomes of the EIA Scoping consultation and, where applicable, how these responses have been addressed. Argyll and Bute Council was a statutory consultee in this process and one of the organisations to provide a thorough response to the Scoping Report. A copy of the EIA Scoping Opinion received is provided in Appendix 5.2 (EIAR Volume 3).

Pre-application Consultation

- 3.5.14 The design incorporates comments received through a series of PAC events, both with the general public and through the Community Liaison Group.
- 3.5.15 Details of how the community events and engagement with the Community Liaison Group have influenced the design of the Proposed Development are set out in the Design Statement, Chapter 5: Summary of Consultation (EIAR Volume 2a), and the PAC Report that accompanies this application.

Grid Connection

- 3.5.16 A connection to the electricity transmission / distribution system will be required. This does not form part of the Proposed Development and is not the subject of this current application. This will be developed by Scottish Hydro Electric Transmission Limited and Scottish Hydro Electric Power Distribution plc, as the transmission and distribution network operators respectively, and it is anticipated this will be the subject of a separate consideration under the relevant EIA Regulations in the context of the consenting process for the connection if necessary. There is an expectation that this connection will be via an underground cable, although the final configuration is the decision of the network operator.

4. The Established Need for Onshore Wind Energy

4.1 Introduction

4.1.1 The commitment to the development of renewable energy, including onshore wind, in order to decarbonise the means of energy production, is evident through climate and energy policy at international and domestic levels, for example:

- Global (for example, the *Paris Agreement*),
- United Kingdom (UK; for example, *Net Zero: The UK's Contribution to Stopping Global Warming*), and
- Scotland (for example, *Protecting Scotland's Future: the Government's Programme for Scotland 2019-2020*; and the *Climate Change Plan*).

4.1.2 Key energy policy in a UK and Scotland context is also discussed in Chapter 6: Planning and Energy Policy Context (EIAR Volume 2a).

4.2 The Climate Emergency

Scotland

4.2.1 In April 2019 Scotland became one of the first nations in the world to declare a state of climate emergency, a step which seeks to place climate change at the heart of all policy decisions and recognises that a system-wide approach is required to address the actions needed to transition to a low carbon economy. Following the First Minister's declaration of a climate emergency, the Scottish Government made amendments to the Climate Change (Scotland) Act 2009 in the form of the Climate Change (Emissions Reduction Targets) (Scotland) Act 2019 to set a net zero emissions target for 2045. This amended and increased the targets for 2030 (to 75% reduction) and 2040 (to 90% reduction). The independent UK Committee on Climate Change advised that these targets represent a high ambition contribution to the UN Paris Agreement aims, including limiting warming to 1.5°C (Scottish Government, 2019b).

4.2.2 A Fairer, Greener Scotland: Programme for Government 2021-22 (Scottish Government, 2021b) is the legislative programme of the Scottish Government which establishes key actions for the following year. The climate emergency is central to this programme in establishing immediate steps on the route to net zero emissions.

4.2.3 The Scottish Government's Draft National Planning Framework 4 (NPF4) (Scottish Government, 2021c) includes Policy 2 ('Climate Emergency') which sets out the requirement

that planning authorities give “*significant weight*” to the global climate emergency when considering development proposals (see Section 5.2 below for more detail on NPF4).

United Kingdom

- 4.2.4 The UK Government declared a climate emergency in May 2019. The following month this commitment drove the Climate Change Act 2008 (2050 Target Amendment) Order 2019 which amended the central greenhouse gas emissions reduction target to net zero emissions by 2050 for the UK as a whole.

European Union

- 4.2.5 In November 2019 the EU declared a climate emergency. In the wake of this the EU has published the European Green Deal (European Commission, 2019) which represents the roadmap for making the EU's economy sustainable. One of the key actions associated with the roadmap is the pursuit of an EU that will be climate neutral in 2050. This action has been pursued through the proposal of a ‘European Climate Law’ in March 2020 (European Commission, 2020) which seeks to enforce zero net emissions of greenhouse gases by 2050. The Climate Law represents the statutory embodiment of the previous EU political commitment towards achieving ambitious net zero targets. It is the heart of the European Green Deal. The Climate Law addresses the pathway required to achieve the 2050 target, and proposes measures which will periodically assess the progress being made by nations towards the reducing emissions. This emphasises the immediacy placed on actions at a national level which will be required in order to meet such a demanding target. Whilst noting the UK is no longer part of the EU, the above highlights the importance placed internationally on the support for development of renewables.
- 4.2.6 In the context of the climate emergency recognised at Scottish, UK, and international levels, ambitious net zero emissions targets take on a pressing significance as do the actions required to address them. The need for the development of renewables becomes increasingly significant.

4.3 Renewable Energy in Scotland

- 4.3.1 The Energy Statistics for Scotland – Q3 2021 Figures (Scottish Government, 2021d) records that there were 12.2 gigawatts (GW) of operational renewable electricity capacity in Scotland by September 2021.
- 4.3.2 The Ministerial Foreword by Michael Matheson (Cabinet Secretary for Net Zero, Energy and Transport) clearly details that the Scottish Government remains committed to net zero targets, renewable energy and onshore wind energy through the ambition to secure an additional 8 to 12 GW of installed onshore wind capacity by 2030, as set out in the draft Onshore Wind Policy Statement Refresh released in October 2021 (Scottish Government, 2021d). In the context of the declared ‘climate emergency’, it is therefore important that stronger efforts are made to ensure other future targets are met.

- 4.3.3 Reports to Scottish Ministers from the Planning and Environmental Appeals Division recognise the need for the continued expansion of the renewables sector and the particularly important role of onshore wind. For example, the Inquiry Report to the Scottish Ministers for the construction and operation of Pencloe Wind Farm (2 March 2018; reference WIN-190-4), states:

“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”.

- 4.3.4 In the Hopsrig Appeal Decision (28 January 2019; reference PPA-170-2135), the Reporter set out at Paragraph 64 that:

“I agree with the appellant that the [Onshore Wind Policy Statement] OWPS uses particularly positive language when discussing onshore wind. For example, in paragraph 3, it is described as playing a “vital role in meeting Scotland’s energy needs and a material role in growing our economy.” It is also stated that “Onshore wind generation will remain crucial in terms of our goals for a decarbonised energy system...” I find it significant that, despite the progress that has been made in recent years in the delivery of onshore wind energy development and the consequent improvement there has been in the provision of energy in ways that minimise greenhouse gas emissions, there remains undiminished, in principle, policy support for further such development. This is made clear in paragraph 4 of the OWPS – “Scotland will continue to need more onshore wind development and capacity, in locations across our landscapes where it can be accommodated.”

4.4 Summary of Need

- 4.4.1 The need for additional renewable energy and onshore wind generating capacity is therefore well established through national and international policy direction concerning the drive for net zero, declarations of global climate emergencies and renewable energy and onshore wind energy targets, as well as through recent appeal decisions for onshore wind energy. This need will be further demonstrated and expanded throughout the remainder of this Planning Statement.
- 4.4.2 The Development Site has previously been deemed to be capable of facilitating a commercial scale wind farm in the form of the Consented Development. As the Proposed Development would increase the generation capability of a wind farm on the Development Site by almost 100%, it responds to this established need for renewable energy without a corresponding increase in the significance of environment effects.

5. National Policy Assessment

5.1 Introduction

5.1.1 The key national legislative and policy documents of relevance to the Proposed Development are set out below:

- National Planning Framework 3 (NPF3) (2014b),
- Scottish Planning Policy (SPP) (2014a), and
- Scottish Energy Strategy (2017b) and updated Energy Strategy: Position Statement (2021e).
- Onshore Wind Policy Statement (2017), & draft Refresh released for consultation in October 2021 (2021a).

5.1.2 The Scottish Government sets out their vision for future development in Scotland through the connected publications, NPF3 (Scottish Government, 2014b) and SPP. This vision centres on Scotland as:

1. A successful sustainable place,
2. A low carbon place,
3. A natural resilient place, and
4. A connected place.

5.1.3 NPF3 and SPP will both be explored further below, with a focus on their bearing on the Proposed Development.

5.1.4 As discussed further within this section, these documents set out the ongoing policy and legislative support for onshore wind energy development. SPP additionally includes a presumption in favour of sustainable development which is assessed below, followed by consideration of the vision of future development in Scotland as also set out in SPP.

5.1.5 The Scottish Energy Strategy sets out the Scottish Government's vision for the future energy system in Scotland until 2050. The Strategy is supported by the Onshore Wind Policy statement which emphasises the role of the onshore wind sector in contributing to the Scottish Economy, and to national energy targets. Both will be discussed within this section.

5.2 Emerging Policy and Legislation

The Planning (Scotland) Act 2019

- 5.2.1 The Scottish Parliament passed the Scotland (Planning) Bill in June 2019. This subsequently received Royal Assent as the Planning (Scotland) Act 2019 in July 2019. The Planning (Scotland) Act 2019 identifies the ‘purpose of planning’ as being to manage the development of land in the long-term public interest. Development which contributes to sustainable development is specifically recognised as being in the long-term public interest. Work is now being carried out to develop secondary legislation and guidance to implement the new Act. As part of this, the National Planning Framework is being reviewed.

National Planning Framework 4

- 5.2.2 The preparation of NPF4 has begun, with a draft published in November 2021 and final version expected for adoption in 2022 following Scottish Ministers approval. NPF4 will direct focus to “*improve health and well-being for the people of Scotland... and provide a spatial planning response to the Global climate emergency*” (Scottish Government, 2019a, p.1) putting climate change at the heart and top of the planning agenda.
- 5.2.3 The Ministerial Foreword of the draft identifies that the central purpose of NPF4 is to align with and ensure planning policy is oriented towards the delivery of Scotland’s national emissions targets: “*our fourth National Planning Framework, sets out how our approach to planning and development will help to achieve a net zero, sustainable Scotland by 2045*” (Scottish Government, 2021c, p.2). NPF4 will be part of a wider package to deliver the reform envisaged by the Planning (Scotland) Act 2019.
- 5.2.4 Part 1 of the draft identifies ‘action areas’ as part of the overarching spatial strategy of NPF4, with priorities established for each area. The western coastline of Kintyre falls within the ‘north and west coast innovation’ area. The draft NPF4 explains the importance of the area: “*Scotland’s north and west coast and islands will be at the forefront of our efforts to reach net zero emissions by 2045... as one of the most renewable energy rich localities in Europe with significant natural resources, there is a real opportunity for this part of Scotland to support our shared national outcomes.*” (p. 12).
- 5.2.5 Part 2 of the draft NPF4 identifies national developments, which “*are significant developments of national importance that will help to deliver our spatial strategy*” (p. 44). National Development 12 ‘*Strategic Renewable Electricity Generation and Transmission Infrastructure*’ includes all “*electricity generation, including electricity storage, from renewables of or exceeding 50 MW capacity*”. The need for this is stated as: “*Additional electricity generation from renewables and electricity transmission capacity of scale is fundamental to achieving a net zero economy and supports improved network resilience in rural and island areas*” (p. 59).
- 5.2.6 Part 3 of the draft NPF4 sets out policies for the development and use of land, to be used by planning authorities in development plan production and in development management

decisions. The proposed 'Policy 2: Climate Emergency' states that when considering all development proposals "*significant weight should be given to the Global Climate Emergency*" (p. 69).

- 5.2.7 The introductory text of the proposed 'Policy 19: Green Energy' identifies the significance of the energy sector in contributing towards emissions reduction, and in the delivery of a "*green, fair and resilient economic recovery*". While the policy expresses support for renewable energy development generally in delivering these benefits, onshore wind in particular is placed in a unique position: "*it is likely that the onshore wind sector will play the greatest role in the coming years. The planning system should support all forms of renewable energy development and energy storage...*". The use of energy storage is introduced here and forms part of the proposed Policy 19 (b) which provides support in principle for renewable energy development proposals together with "*energy storage such as battery storage*" (p. 90).
- 5.2.8 The proposed Policy 19 (a) directs planning authorities to prepare local development plans that "*seek to ensure that an area's full potential for electricity and heat from renewable sources is achieved.*". The proposed Policy 19 (a) then states opportunities for repowering and extending existing renewables, alongside new development should be supported. Support for repowering, extending, and expanding existing wind farms is also the direct focus of the proposed Policy 19 (e) (p. 90).
- 5.2.9 The proposed Policy 19 (g) refers to those sites with extant wind farm consents: "**Areas identified for wind farms should be suitable for use in perpetuity.** Consents may be time-limited but wind farms should nevertheless be sited and designed to ensure impacts are minimised and to protect an acceptable level of amenity for adjacent communities" (p. 90).
- 5.2.10 **As a project which will support Scotland's increasing reliability on renewable energy, the Proposed Development will undoubtedly assist in progressing towards the ambitious but necessary targets which themselves are central to the forthcoming NPF4. The principle of the Proposed Development, including its battery storage facility and its location, is clearly supported by the draft NPF4. The proposed Policy 19: Green Energy' extends clear and direct support for onshore wind and energy storage, and states that areas identified for wind farms (such as the Development Site) should be suitable for use in perpetuity.**

5.3 Weight of National Policy

- 5.3.1 As established in section 3.3 of this Planning Statement, SPP should be considered as a significant material consideration in the policy assessment, given that the LDP is more than five years old.
- 5.3.2 Paragraph (iii) on page 2 of SPP also clarifies that "*As a statement of Minister's priorities the content of the SPP is a material considerations that carries significant weight, though it is for the decision-maker to determine the appropriate weight in each case. Where development*

plans and proposals accord with this SPP, their progress through the planning system should be smoother”.

- 5.3.3 While it is ultimately up to the determining authority (in this case the Scottish Ministers) to judge the weight afforded to the policy framework within SPP against an ageing Development Plan, it is clear that the presumption in favour of development that contributes to sustainable development established through SPP should have significant influence on considering the acceptability of the Proposed Development. This is discussed further in section 5.5: Scottish Planning Policy.

5.4 National Planning Framework 3

- 5.4.1 NPF3 (Scottish Government, 2014b) is a long-term strategy for the direction of development and infrastructure investment in Scotland, as identified by the Scottish Government for the purpose of economic and sustainable growth.
- 5.4.2 Specific reference is given to the energy sector as one of seven sectors to accelerate economic growth. Support is also given for emerging technologies in renewable energy. Development should facilitate adaptation to climate change; reduce resource consumption and lower greenhouse gas emissions.
- 5.4.3 Reference to onshore wind is set out in the ‘A Low Carbon Place’ section. Key points from NPF3 include:
- Paragraphs 3.1 to 3.6 which discuss how planning will play a key role in delivering on the previous target of an 80% reduction in greenhouse gas emissions by 2050. However, since publication of NPF3, this target has been revised and now comprises a reduction in emissions to net zero by 2045 as discussed in Section 4. The priorities in NPF3 are intended to set a clear direction, consistent with climate change legislation.
 - Paragraph 3.7 confirms support for onshore wind energy but notes that development should avoid internationally and nationally protected areas. The Proposed Development avoids such areas.
 - It is also recognised in paragraph 3.7 that there is strong public support for wind energy but opinions about onshore wind in particular areas can vary. In some places concern is expressed about the scale, proximity and impacts of proposed wind developments. In other places they are recognised as an opportunity to improve the long-term resilience of rural communities, with more communities benefiting from local ownership of renewables.
 - Paragraph 3.9 clarifies that Scotland will continue to capitalise on wind resources as part of the push to diversify Scotland’s energy generation capacity.
 - Paragraph 3.23 reiterates that onshore wind will continue to make a significant contribution to diversification of energy supplies but that wind development is not desirable in National Parks or National Scenic Areas and points to spatial frameworks

which are to be prepared in line with the SPP (see below) to guide new wind energy developments to appropriate locations.

- 5.4.4 **In principle, the Proposed Development is therefore strongly supported by NPF3 as onshore wind is seen as important element to future energy mix. It is also appropriate given its location outwith internationally and nationally protected areas, avoiding those recognised as being most sensitive.**

5.5 Scottish Planning Policy

- 5.5.1 SPP is non-statutory, yet as guidance issued by Scottish Ministers under Section 3 (d) of the Planning Act, planning authorities must have regard to it and it is therefore a material consideration in the determination of planning applications.
- 5.5.2 Paragraph 154 of SPP makes clear that the planning system should support the transformational change to a low carbon economy, consistent with national renewable energy objectives and targets.
- 5.5.3 Onshore wind is referred to specifically in paragraphs 161 to 166 (development planning considerations) and paragraphs 169 to 174 (development management considerations) of SPP. Guidance for onshore wind includes reference to spatial frameworks that should be included in development plans to identify the most appropriate areas for wind farms. They should identify three groups of areas including:
- Group 1: Areas where wind farms will not be acceptable (i.e. National Parks and National Scenic Areas),
 - Group 2: Areas of significant protection: (e.g. National and international designations, nationally important environmental interests, and community separation for considering visual impact), and
 - Group 3: Areas with potential for wind farm development (where wind farms are likely to be acceptable subject to consideration of details).
- 5.5.4 As established through the DPEA Report to Scottish Minister's as part of the appeal decision (ref: PPA-130-2064) for the Consented Development, the Proposed Development should be considered as being effectively in a Group 3 area; further detail on this is provided in Paragraph 6.1.5 below.
- 5.5.5 It was established in Section 5.3: 'Weight of National Policy' that the presumption in favour of development that contributes to sustainable development as introduced by SPP is a significant material consideration in regard to the Proposed Development, due to the age of the LDP.
- 5.5.6 In order to assess whether the Proposed Development would contribute to sustainable development, each of the relevant principles set out in Paragraph 29 of SPP are investigated below in turn. This does not include the principles of supporting town centre and regeneration

priorities; and the delivery of accessible housing, business, retailing and leisure development, as these principles are not relevant to the Proposed Development.

- 5.5.7 It should be recognised that for a development to be considered as contributing to sustainable development, it will not have to meet each of the sustainable development principles discussed below. In actuality, the development should only be considered unsustainable if any negative effects of the principles discussed below would, on planning balance, significantly and demonstrably outweigh the positive contribution made by the Proposed Development.

Sustainable Development Principles

Net Economic Benefit

- 5.5.8 Paragraph 29 of SPP states: “*giving due weight to net economic benefit*” (p. 9).
- 5.5.9 While economic effects are not identified as ‘significant’ in EIA terms, a number of notable beneficial effects have been identified in Chapter 13: Socio-economics, Recreation and Tourism (EIAR Volume 2a). These are discussed further below:
- Construction (and decommissioning): Expenditure in the locality; the creation of a local supplier database; job creation (with the proposal of a Meet the Developer Day to inform local businesses of opportunities); and construction workers using accommodation are all anticipated to lead to a beneficial impact on the local economy, community, socio-economics and accommodation providers.
 - Operation: Similar to construction, there are likely to be some minor beneficial effects during the Proposed Development’s operation in regards to job creation and expenditure in the locality. From the Renewable UK (2015) report, the average net job creation is 0.43 for every 1 MW of electricity generated during the operational phase. This equates to at least 25.8 FTE jobs over 35 years for the Proposed Development. There would also be a beneficial effect from the local community fund, which (depending on final installed capacity) could have a total value in the order of £300,000 per year (£5,000 per MW), which equates to £10.5 million over the lifetime of the Proposed Development. The economic effect of this community benefit payment will depend on the uses to which it is put, but by way of an illustration, figures from the Scottish Council for Voluntary Organisations show that each £54,170 in income to the voluntary sector in Scotland supports one FTE job. On that basis, funding of £300,000 per year would be enough to support at least five jobs in the voluntary sector each year. As an additional benefit, the Applicant is offering the local community the opportunity to invest into the Proposed Development. This will involve one or more community organisations coming together to form a Community Vehicle. The Community Vehicle will then be able to invest in a Special Purpose Vehicle (SPV), a new limited company established by the Applicant, up to a total share of 49%. If they decide not to invest to that level, then the landowner FLS will themselves be able to invest up to a combined total, with the community, of 49%. In return for this investment, the Community Vehicle will receive shares (equity stake) in the SPV.
- 5.5.10 Minor adverse effects to the economy were also identified in Chapter 13: Socio-economics, Recreation and Tourism (EIAR Volume 2a). During construction and decommissioning these

relate to amenity issues caused by noise, traffic, dust and large machinery. During operation, there will be some minor change in views from certain tourist routes, overall however this is predicted to have a negligible effect on visitor numbers to the area and associated accommodation provision.

- 5.5.11 Overall, it is considered that there will be a minor net economic benefit to the local economy from the Proposed Development, especially when considering the potential local employment opportunities during construction and decommissioning, the potential use of the local community fund during operation, and the investment opportunity for the local community. This corresponds with the OWPS (Scottish Government, 2017a) and the Argyll and Bute LDP (Argyll and Bute Council, 2015), which emphasise the economic benefits of renewable energy.

Economic Issues, Challenges and Opportunities

- 5.5.12 Paragraph 29 of SPP states: “*responding to economic issues, challenges and opportunities, as outlined in local economic strategies*” (p. 9).
- 5.5.13 Local economic strategy for the region is partly set out in the Argyll and Bute Outcome Improvement Plan 2013-2023 (Argyll and Bute Council, 2013). The plan presents a vision of economic recovery for the region and identifies issues and challenges, including the rate of population decline and employment (including a high dependence on seasonal industries).
- 5.5.14 A number of opportunities are also identified through the plan, including long-term economic and sustainable growth outcomes, such as increasing and developing the use of renewable energy, which is identified as a key growth sector. Community benefits or investment opportunities associated with renewables projects are not recognised directly, but the role of renewables development in contributing to community resilience is touched upon under Outcome 2 ‘We have infrastructure that supports sustainable growth’.
- 5.5.15 The Proposed Development is therefore consistent with the plan through increasing the provision of renewable energy, providing a local community fund, providing community investment opportunities, and providing minor beneficial local economic and job creation effects, which are all identified in the ‘Net Economic Benefit’ section.
- 5.5.16 The opportunity of economic growth through renewable energy is additionally recognised in the LDP, which links the industry to Argyll and Bute Council’s Key Objective D for the economy of the region.

Good Design and Qualities of Successful Places

- 5.5.17 Paragraph 29 of SPP states: “*supporting good design and the six qualities of successful places*” (p. 9).
- 5.5.18 The design evolution of the Proposed Development is detailed in the Design Statement accompanying the Section 36 Application and Chapter 4: Reasonable Alternatives (EIAR Volume 2a). Good design goes beyond aesthetic considerations and the functionality of an

object, including fitness for purpose and sustainability, is equally important. Accordingly, the design of the Proposed Development has been influenced by a number of factors, including maximising wind resource, avoiding internationally and nationally designated areas, minimising land take, siting the turbines to minimise landscape, visual and noise impacts, and avoiding sensitive features and receptors. Good design principles have therefore shaped the evolution of the Proposed Development.

- 5.5.19 The six qualities of successful places are set out in Paragraphs 41 to 46 of SPP and most are framed with traditional built development in mind (offices, housing etc.) and are not of relevance to a wind energy development, where the design priorities are to minimise environmental impact whilst maximising energy output, rather than, for example, creating a distinctive or welcoming environment. The Proposed Development is however of relevance to one of the six qualities relating to resource efficiency, as existing site tracks will be utilised where possible and the Proposed Development has been sited and designed to maximise wind resource.

Delivery of Infrastructure

- 5.5.20 Paragraph 29 of SPP states: “*supporting delivery of infrastructure, for example transport, education, energy, digital and water*” (p. 10).
- 5.5.21 As the object of the Proposed Development is the delivery of energy infrastructure, the Proposed Development should not lead to infrastructure deficiencies, as established in the Inquiry Report to the Scottish Ministers for the construction and operation of Caplich Wind Farm (29 November 2017).
- 5.5.22 In this instance, only the Proposed Development’s impact on the road network would be relevant, which is addressed through Chapter 14: Traffic, Transport and Access (EIA Volume 2a). This finds that, based on an assessment of a worst-case traffic scenario and following the implementation of mitigation measures, there would be no significant effects on the road network during construction, operation or decommissioning of the Proposed Development. The Proposed Development itself therefore would not result in any infrastructure deficiencies.

Climate Change Mitigation and Adaptation

- 5.5.23 Paragraph 29 of SPP states: “*supporting climate change mitigation and adaptation including taking account of flood risk*” (p. 10).
- 5.5.24 The Proposed Development would help to support climate change mitigation by replacing fossil fuel energy generation with renewable energy, thereby reducing emissions of climate changing gases. A Carbon Balance Assessment was prepared for the EIA and is presented in Appendix 11.4 (EIA Volume 3). The purpose of this was to assess the carbon emission savings associated with the Proposed Development, taking into account factors such as it being constructed on peatland, that forestry will be felled to accommodate it, and that there will be carbon losses from turbine manufacture.

- 5.5.25 The plans for forestry replanting, including peatland restoration, were not included in the calculations. Neither was the battery storage facility due to limitations with the carbon calculator. Appendix 11.4 (EIAR Volume 3) provides full detail on all of the assumptions used in the calculations.
- 5.5.26 The expected total carbon payback time of the Proposed Development, based on the carbon losses, is 1.8 years. It should be noted that as neither the replanting regime, including the peatland restoration, nor the battery storage facility, were included in the calculations, the potential payback period is likely to be better than identified.
- 5.5.27 Based on the expected scenario, the Proposed Development could prevent over 3.1 million tonnes of CO₂ equivalent emissions being released into the atmosphere over the project's 35-year lifetime compared to a fossil fuel mix of electricity generation. This is the equivalent of the emissions from 50,756 average houses over 35 years (Department for Business, Energy and Industrial Strategy, 2021).
- 5.5.28 The Argyll and Bute Council area has an estimated 42,801 households based on National Record of Scotland's (2021) '*Estimates of Households and Dwellings in Scotland, 2020*'. Therefore, the Proposed Development could offset the emissions from the fossil fuel mix supplied electricity to all the households in the Argyll and Bute Council area.
- 5.5.29 As a comparison, the expected total carbon payback time of the Consented Development was identified as 2.3 years; the emissions savings over its 25-year lifespan was over 1.8 million tonnes of CO₂; and the equivalent emissions was 25,578 average households. This illustrates that the Proposed Development's expected contribution towards Scotland's net zero targets is significantly higher than that of the Consented Development.

Health and Well-being

- 5.5.30 Paragraph 29 of SPP states: "*improving health and well-being by offering opportunities for social interaction and physical activity, including sport and recreation*" (p. 10).
- 5.5.31 Access to the Kintyre Way will be maintained throughout the construction, operation and decommissioning of the Proposed Development, although it will be controlled when necessary for health and safety. As a long-distance route, there is value in continuity and temporary restrictions to access may be a deterrent to some planning to walk the route; however, any restrictions would be short-term, lasting no more than a few hours at a time. While delays may occur during construction, and long-term visual impacts of the Proposed Development at specific parts of the route are anticipated, it is not expected that the overall impact on the experience of the route will be significant. Visitors and recreational users are therefore unlikely to be deterred as a result of the Proposed Development.

Principles for Sustainable Land Use

- 5.5.32 Paragraph 29 of SPP states: "*having regard to the principles for sustainable land use set out in the Land Use Strategy*" (p. 10).

5.5.33 The Land Use Strategy (Scottish Government, 2021f) is a requirement of the Climate Change (Scotland) Act 2009 and should be reviewed and revised every five years. The vision of the strategy centres on sustainable land use, where the importance of land resources are recognised, understood and valued, and any plans and decisions taken deliver improved and enduring benefits.

5.5.34 There are ten principles of sustainable land use which are to be used as a decision-making tool, although not all the principles are relevant to every development. These were established in the first and second Land Use Strategies and are not reiterated within the latest 2021 publication. However, for the purposes of this assessment as required by SPP, those principles of relevance to this Development are considered below:

- *“Opportunities for land use to deliver multiple benefits”:*
 - The Proposed Development would provide benefits relating to renewable energy and contributions towards relevant national energy, electricity and climate change targets, and
 - The Proposed Development would additionally lead to beneficial effects in relation to the restoration of blanket bog habitat from forestry in line with the requirements of the updated Carradale LMP (FLS, *unpublished*) and FLS restoration standards.
- *“Where land is highly suitable to a primary use (for example food production, flood management...) this value should be recognised in decision-making”:*
 - The Development Site comprises forest managed primarily for timber production, much of which is nearing or at commercial maturity. Therefore, the forest is in a process of dynamic change as it transitions from plantation to a more diverse forest which meets the current requirements of the UK Forest Standard.
 - To reflect the UK Forest Standard, the updated Carradale Land Management Plan (FLS, *unpublished*) contains, in its restocking proposals, areas of broadleaved planting and peatland restoration, in addition to tree species used for commercial timber production (namely sitka spruce).
 - Due to the close and constructive dialogue between the Applicant and FLS over an extended period, the Proposed Development will have a minimal effect on the commercial forestry plantation (see Chapter 17: Forestry; EIA Volume 2a).
 - The areas of the Development Site containing peat provide a valued habitat and carbon storage function. Mitigation measures detailed in Chapter 11: Geology, Hydrology and Hydrogeology (EIA Volume 2a), such as not locating infrastructure on areas of deep peat (> 2m), installing floating access tracks on peat with a depth above 2m and carrying out peatland restoration works as soon as possible after disturbance, will help to minimise the impact on peatlands during construction.
 - On balance, the peat calculated to be lost as a result of the Proposed Development, without taking into account the 56.2ha of peatland restoration, equals 0.07% of the peat excavated for construction, which is considered to be negligible (see Appendix 11.7; EIA Volume 3). With the addition of 56.2ha of peatland restoration, there will be a net beneficial effect on peat from the Proposed Development.

- The Proposed Development will therefore have a minimal effect on the commercial forestry plantation which currently covers most of the Development Site, and will also result in the restoration of a large area of peatland which is currently covered with sitka spruce, a crop with little ecological value. Neither the Development Site's value as commercial forestry nor as peatland will therefore diminish as a result of the Proposed Development.
- *"Land use decisions should be informed by an understanding of the functioning of the ecosystems which they affect in order to maintain the benefits of the ecosystem services which they provide":*
 - Ecological and ornithological surveys were conducted for the EIA and are presented in Chapters 9 and 10 of the EIAR (Volume 2a). These consider the baseline ecology of the study area and both the positive and negative effects of the Proposed Development. The key finding is the likely beneficial effects due to the restoration of blanket bog, and the wider benefits this restoration may have on certain species. In addition to this, blanket bog will change from being a carbon source to a carbon sink when moving from degradation to restoration; therefore, wider ecosystem service benefits are apparent with the Proposed Development.
- *"Landscape change should be managed positively and sympathetically, considering the implications of change at a scale appropriate to the landscape in question, given that all Scotland's landscapes are important to our sense of identity and to our individual and social wellbeing":*
 - Potentially significant adverse landscape and visual effects resulting from the Proposed Development have been addressed through an iterative design process (i.e. 'mitigation by design'), as described in Chapter 7: Landscape and Visual (EIAR Volume 2a). The very nature of wind energy development is that some attributes (namely the scale and visibility of individual structures) are difficult to mitigate entirely. However, through a process of mitigation by design, the turbine layout can be altered such that specific effects on certain receptors are reduced to acceptable thresholds and the overall layout can be optimised to provide a balance between providing effective renewable energy generation and reducing effects to an acceptable level,
 - Although it is reported in Chapter 7 of the EIAR that there will be a small number of generally localised landscape and visual effects resulting from the Proposed Development, it is not considered that the wider landscape and visual resource of the area would be significantly adversely affected. The landscape change which would result from the Proposed Development has therefore been positively and sympathetically managed through the design process for the Proposed Development, with landscape and visual impacts being amongst the key influences.
- *"Land-use decisions should be informed by an understanding of the opportunities and threats brought about by the changing climate. Greenhouse gas emissions associated with land use should be reduced and land should continue to contribute to delivering climate change adaptation and mitigation objectives":*
 - It is established through Appendix 11.4 (EIAR Volume 3), and also referenced under the 'Climate Change Mitigation and Adaptation' section above, that the Proposed

Development would have an expected payback period of 1.6 years and could prevent over 4,316,000 tonnes of CO₂ equivalent emissions being released into the atmosphere, without accounting for the battery storage facility or any replanting, including the area of peatland restoration. It would therefore meet this principle of sustainable land use.

- *“Outdoor recreation opportunities and public access to land should be encouraged, along with the provision of accessible green space close to where people live, given their importance for health and well-being”:*
 - This principle is only of relevance to the Proposed Development in regard to whether it would lead to a loss of outdoor recreation opportunities and public access. The topic is addressed above under the ‘Health and Well-being’ sustainable development principle above.
- *“People should have opportunities to contribute to debates and decisions about land use and management decisions which affect their lives and their future”:*
 - The PAC Report and Design Statement, submitted in support of the Section 36 Application, provide detail on the community engagement programme conducted throughout the design process through all 11 design review stages (2013 - 2021). Public Information Days, Community Liaison Group meetings and Public Exhibitions (including a month-long virtual exhibition in 2021) have all influenced the design up to the Proposed Development,
 - As detailed in the PAC Report, all of these events were well advertised, and all provided opportunities for the local community or their representatives to input and provide feedback on the Proposed Development as its design progressed.

Cultural Heritage

5.5.35 Paragraph 29 of SPP states: *“protecting, enhancing and promoting access to cultural heritage, including the historic environment”* (p. 10).

5.5.36 It was concluded through the assessment of archaeology and cultural heritage (Chapter 12; EIAR Volume 2a) that the Proposed Development would not have a significant effect (either individually or cumulatively) on cultural heritage, including the historic environment. The Proposed Development therefore accords with this sustainable development principle.

Natural Heritage

5.5.37 Paragraph 29 of SPP states: *“protecting, enhancing and promoting access to natural heritage, including green infrastructure, landscape and the wider environment”* (p. 10).

5.5.38 The accessibility of natural heritage is addressed indirectly through the LVIA presented in Chapter 7 (EIAR Volume 2a). This is through consideration of the Proposed Development’s impact on the Kintyre Way, which would run north of the Development Site and serves as access to the Proposed Development. The visual effect of the Proposed Development on the Kintyre Way is identified as a significant effect in the LVIA and is due to the proximity of the Proposed Development to the route. Nevertheless, the Proposed Development would not lead

to the route becoming unusable at any point during construction, operation or decommissioning and so accessibility will not be affected.

5.5.39 Whilst the Proposed Development would be visible at specific parts of the route, the LVIA concludes that the Proposed Development would not result in overwhelming visual effects in relation to the amenity of users. The overall experience of the route is expected to be unaffected.

5.5.40 The Proposed Development includes the restoration of blanket bog (see Chapter 9; EIAR Volume 2a) and a forestry restocking plan (see Chapter 17; EIAR Volume 2a). This will not affect public access, but will provide the opportunity to view habitat restoration in place of forestry plantation rotations as is currently the case.

Waste

5.5.41 Paragraph 29 of SPP states: “*reducing waste, facilitating its management and promoting resource recovery*” (p. 10).

5.5.42 Appendix 11.7: Peat Balance Calculations (EIAR Volume 3) shows that through peat reuse measures, there is expected to be an insignificant amount of waste peat (0.07% of the amount excavated for construction) as a result of the Proposed Development, prior to the 56.2 ha of peatland restoration proposed as part of the project.

5.5.43 Chapter 17: Forestry (EIAR Volume 2a) confirms that there is a small area of woodland (26.50 ha), to be cleared in advance of the Proposed Development for key-hole requirements which are not accounted for in the updated Carradale LMP (FLS, *unpublished*). The objective would be to recover as much merchantable timber from these crops as possible and dispatch this via the existing forest road network to the A83 and thereafter to appropriate markets. Any non-merchantable timber would be treated in line with the waste hierarchy in Article 4 (1) of the revised Waste Framework Directive, which is:

- Prevention,
- Preparing for re-use,
- Recycling,
- Other recovery, including energy recovery, and
- Disposal, in a way which delivers the best overall environmental outcome.

5.5.44 It is proposed that full consideration on this issue should be included in a Forestry Waste Management Plan, to form part of the Construction Environmental Management Plan during the detailed design phase following receipt of project consent.

5.5.45 It is therefore clear that the principles of the policy aspirations of SPP in relation to waste are built into the Proposed Development.

Conclusion

- 5.5.46 The relevant sustainable development principles have been explored above and it has been shown that the Proposed Development is consistent with each principle. It can therefore be concluded that the Proposed Development would contribute to sustainable development, which as a result tilts the planning balance in favour of approval.
- 5.5.47 This approach is supported by the Inquiry Report to the Scottish Ministers for the construction and operation of Caplich Wind Farm (29 November 2017), where it was ascertained that where a proposed development is found to contribute to sustainable development, then where SPP paragraph 33 applies (e.g. development plan more than 5 years old), the planning balance should be tilted in favour of approval when weighing the positive and negative aspects of a development, and any adverse impact it would have must be shown significantly and demonstrably to outweigh its benefits.

5.6 Scottish Energy Strategy

- 5.6.1 The Scottish Energy Strategy (2017b) sets out a vision for Scottish energy until 2050, of “a flourishing, competitive local and national energy sector, delivering secure, affordable, clean energy for Scotland’s households, communities and businesses.” Three core principles guide this vision:
- A whole-system view,
 - An inclusive energy transition, and
 - A smarter local energy model.
- 5.6.2 As part of the whole system view principle, two targets are set for 2030:
- *“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.”*
- 5.6.3 Onshore wind is recognised as a key opportunity: *“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.”*
- 5.6.4 The Strategy establishes near-term Scottish Government actions with regard to onshore wind:
- *“Push for UK-wide policy support for onshore wind and take action of our own to prioritise and deliver a route to market.*
 - *Build on the positive and practical provision for onshore wind in our planning system under the next National Planning Framework and Scottish Planning Policy.*
 - *Implement the new Onshore Wind Policy Statement, which underlines the continued importance of this established, low cost resource.”*

- 5.6.5 In March 2021 the Scottish Energy Strategy was updated with a Position Statement (Scottish Government, 2021e), released in preparation for Glasgow hosting the United Nations Framework Convention on Climate Change's 26th Conference of Parties (COP26) in November 2021, as well as to respond to the Climate Change Plan Update (Scottish Government, 2020). This Position Statement is based on the updated target of net zero emissions by 2045 and continues to state the Scottish Government's commitment to onshore wind in order to help meet this target.

Onshore Wind Policy Statement

- 5.6.6 The OWPS was published alongside the Scottish Energy Strategy in 2017 and directly emphasises the role of the onshore wind sector in contributing to the Scottish Economy, and to the national targets for the generation of energy from low carbon technologies.
- 5.6.7 The Ministerial Foreword sets out that *"There is no question that onshore wind is a vital component of the huge industrial opportunity that renewables more generally create for Scotland... Our energy and climate change goals mean that onshore wind will continue to play a vital role in Scotland's future... This important role means we must support development in the right places, and – increasingly – the extension and replacement of existing sites, where acceptable, with new and larger turbines, based on an appropriate, case by case assessment of their effects and impacts"*.
- 5.6.8 Specific comment is made on the need for the contribution of onshore wind to continue to grow, and to the ongoing technological advancement within the sector, specifically the use of larger turbines. This is shown in Figure 1 below.

*“In order for onshore wind to play its vital role in meeting Scotland’s energy needs, and a material role in growing our economy, its contribution must continue to grow. **Onshore wind generation will remain crucial in terms of our goals for a decarbonised energy system...***

This means that Scotland will continue to need more onshore wind development and capacity, in locations across our landscapes where it can be accommodated...

*We know that new projects face a highly uncertain route to market. The arrangements which have enabled onshore wind to expand and to reduce its costs so successfully are no longer in place. Continued innovation and cost reduction, a supportive and well-resourced planning system, and **continued advances in turbine and blade technology will help close the gap that currently exists** – but not sufficiently, and not for all developments...*

*We acknowledge that **onshore wind technology and equipment manufacturers in the market are moving towards larger and more powerful (i.e. higher capacity) turbines, and that these – by necessity – will mean taller towers and blade tip heights.***

*The technology shift towards larger turbines may present challenges when identifying landscapes with the capacity to accommodate larger scale development, as not all will be suitable. However, **fewer but larger wind turbines may also present an opportunity for landscape improvement, as well as increasing the amount of electricity generated.***

Figure 1: Onshore Wind Policy Statement Extract (bold text added).

- 5.6.9 The draft Onshore Wind Policy Statement Refresh released for consultation in October 2021 (Scottish Government, 2021a) updates the 2017 OWPS to reflect the updated net zero 2045 emissions target. This states that “*The transition to net zero means that our demand for green electricity will increase substantially over the course of the next decade. This means that a consistently higher rate of onshore wind, and other renewables capacity, will be required year on year.*” The consultation seeks views on a target for an additional 8 to 12GW of onshore wind be installed in Scotland by 2030.
- 5.6.10 **As such, the Scottish Energy Strategy and Onshore Wind Policy Statement, including 2021 updates, do not simply reinforce earlier Scottish Government support for the principle of onshore wind identified in NPF3 and SPP, they go further. The Onshore Wind Policy Statement provides direct support for the principle of larger, more efficient turbines emerging through enhancements in technology.**

6. Local Policy Assessment

6.1 Introduction

- 6.1.1 Although primacy is not given to the local development plan in Section 36 applications such as the Proposed Development, this remains a material consideration for Scottish Ministers and so will be considered in full within this section.
- 6.1.2 As described previously, the development plan comprises the Argyll and Bute Local Development Plan (**'the LDP'**). The LDP was formally adopted on 26 March 2015 and includes eleven overarching policies. The LDP envisages continued support for the development of renewable energy as an important environmental asset in Argyll and Bute and as part of the spatial strategy for Mid Argyll, Kintyre and the Islands.
- 6.1.3 Policy LDP Strat 1 – Sustainable Development sets out the Council's commitment to principles of sustainable development including reducing the carbon footprint of Argyll and Bute and increasing energy efficiency. The plan continues to support the development of renewables as a key sector in the local economy. Key Objective D expresses support for the continued diversification and sustainable growth of Argyll and Bute's economy, and identifies as a particular focus, the areas of sustainable assets including renewables.
- 6.1.4 More explicitly Policy LDP 6 – Supporting the Sustainable Growth of Renewables states that the Council will continue to 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 turbines over 50m is also referenced which identifies areas where wind farms are not acceptable (Group 1), areas afforded significant protection (Group 2) and areas which may have the potential for wind farms (Group 3).
- 6.1.5 The Development Site is covered by both Group 2 and Group 3 areas. Group 2 areas within the Development Site primarily relate to carbon rich soils and peatland. As the layout of infrastructure, including wind turbines, for the Proposed Development has been influenced by peat assessment (see Chapter 11: Geology Hydrology and Hydrogeology; EIAR Volume 2a), the features afforded significant protection will not be adversely impacted. In addition, peatland restoration is proposed as part of the Proposed Development on an area currently used for plantation forestry. As established through the DPEA Report to Scottish Minister's as part of the appeal decision (ref: PPA-130-2064) for the Consented Development, the Proposed Development should be considered as being effectively in a Group 3 area.
- 6.1.6 Argyll and Bute Council are currently in the process of preparing the Argyll and Bute Local Development Plan 2 (LDP2) which is intended to replace the LDP upon its adoption.

Consultation on this has ended and the next stage in the plan making process will be examination. The LDP2 is planned to be adopted in January 2023. As LDP2 has not yet been adopted, the adopted LDP remains the primary local policy consideration for this application; however, the stance and policies in regard to renewable energy within LDP2 are very similar to the LDP. Policy 30: 'The Sustainable Growth of Renewables' of LDP2 is similar to LDP 6 referenced above, and Policy 04: 'Sustainable Development' of LDP2 is a repeat of LDP Strat 1 discussed above.

Argyll and Bute Indicative Regional Spatial Strategy

- 6.1.7 To support the preparation of NPF4, Argyll and Bute Council have recently prepared a draft Indicative Regional Spatial Strategy (IRSS) (September 2020) at the request of the Scottish Government. Regional Spatial Strategies (RSS) have been introduced as a requirement under the Planning (Scotland) Act 2019 and will represent long-term spatial strategies identifying strategic development need, priorities, locations, and outcomes within a region.
- 6.1.8 RSS will not form part of the statutory development plan but planning authorities must have regard to them when preparing their local development plan. It should be noted that the IRSS such as that produced by Argyll and Bute Council are being prepared on a voluntary basis to inform NPF4 only and do not constitute formal RSSs under the Planning (Scotland) Act 2019. The Argyll and Bute Council IRSS will therefore not be considered within this Planning Statement beyond Section 6.1.
- 6.1.9 The draft Argyll and Bute Council IRSS sets out the Council's ideas for how the region can grow and prosper in the period up to 2050, whilst also supporting the delivery of national priorities and outcomes. The importance and continuing delivery of renewable energy development within the area is a recurrent theme throughout the IRSS.
- 6.1.10 The IRSS recognises climate change mitigation and adaptation as one of the key contextual factors in delivering the Council's vision. The vision *"to 2030 and beyond is that Argyll and Bute is an economically diverse and successful area based on sustainable and low carbon development."*
- 6.1.11 The IRSS recognises three major areas of growth potential within Argyll and Bute. The Development Site falls within the Western Seaboard area, where renewable energy is identified as a *"priority sector"*.

6.2 Approach to Local Policy Assessment

- 6.2.1 The Proposed Development has been sited and designed with full consideration of environmental, social and economic considerations as it has matured from initial project conception to the submission of this Section 36 application. Feedback from key consultees such as Argyll and Bute Council, the Scottish Environment Protection Agency, NatureScot and the public has also led to a number of design refinements. The environmental and social effects of the Proposed Development, as well as its conformity with planning policies, have

therefore been instrumental to the scheme's design. The Design Statement, a separate document submitted with the Section 36 Application, illustrates this further through summarising the key design stages.

- 6.2.2 In regard to the approach for the local policy assessment within this Planning Statement, each topic scoped into the EIA is addressed in turn with respect to its compliance with relevant local policies in Sections 6.4 to 6.15 below. The policies relevant to the Proposed Development within the LDP are listed and summarised within Chapter 6: Planning and Energy Policy Context (EIAR Volume 2a).
- 6.2.3 Given its focus on renewables developments, Policy LDP 6 – Supporting the Sustainable Growth of Renewables, introduced under Section 6.1 of this Planning Statement, is however considered to be of most relevance to the Proposed Development and the assessment in Sections 6.4 to 6.15 below. It should be noted that the Policy LDP 6 criteria against which development proposals will be considered, do not materially differ from the matters identified by SPP. The Proposed Development was shown in Section 5.5 to be consistent with the sustainable development principles and spatial framework criteria of SPP and should therefore also be considered to accord with Policy LDP 6.
- 6.2.4 In order to provide a proportionate assessment, the assessment in Sections 6.4 to 6.15 below seeks to focus primarily on those residual adverse effects which have been identified as significant within the EIAR following the additional mitigation measures proposed. This focus allows the policy assessment to concentrate on those issues which, based on the outcomes of the EIA, are of most significance to the policy aspirations for the area. While it is recognised that the outcomes of the EIA are not a demonstration of planning policy compliance, the assessment process does recognise that planning policy is a key consideration in determining the significance of receptors and therefore the overall acceptability of the Proposed Development in terms of accord with the LDP and other material considerations.
- 6.2.5 A comparison of the key policies from the LDP and LDP2 has also been provided in Chapter 6 (EIAR Volume 2a). The policy assessment below will consider LDP2 policies where appropriate.
- 6.2.6 Prior to the policy analysis structured on the relevant EIA topic, policy in regard to the principle of the Proposed Development more generally is considered.

6.3 Principle of Development

- 6.3.1 As established in Sections 4 and 5 of this Planning Statement and Chapter 6 of the EIAR (Volume 2a), there exists a clear national need and support for the delivery of renewable energy development, including onshore wind.
- 6.3.2 Regarding the spatial elements of local planning policy, it is considered that the principle of delivering onshore wind at the Development Site remains unchanged from the Consented Development. While it is acknowledged that when compared, the Proposed Development has

been altered from the Consented Development, the existing permission held by the Consented Development evidences that the receiving environment of the Development Site has previously been deemed to be capable of facilitating significant energy generation in the form of a commercial scale wind farm.

- 6.3.3 The focus therefore, in considering the acceptability of the Proposed Development, should move towards those specific policy areas which relate to the differences between the Consented Development and the Proposed Development, and to the significant effects identified through the EIA. For reference Table 2-1 in Section 2 compares the significant effects identified in each of the EIAs for the Consented Development and the Proposed Development.
- 6.3.4 While the principle of locating onshore wind development at the Development Site should be considered unchanged from the Consented Development, the energy and climate policy context clearly has evolved. The climate emergency declaration and associated emissions targets reflect a significant policy shift since the Consented Development application was submitted. This contextual shift serves to add further weight behind the fundamental need for renewable energy development such as the Proposed Development. Therefore, in consideration of the planning and energy policy context at national and local levels, the principle of implementing the Proposed Development at the Development Site is undoubtedly established.

6.4 Landscape and Visual Impact

- 6.4.1 A Landscape and Visual Impact Assessment (LVIA) has been carried out and reported in Chapter 7 of the EIAR (Volume 2a). The LVIA considers the likely effects of the Proposed Development on landscape character and visual amenity. The LVIA includes consideration of visible aviation lighting for key receptors, specifically in relation to potential change experienced during the daytime and at night. The LVIA concludes the Proposed Development would not result in significant effects on any nationally or locally designated landscapes during construction / decommissioning, or through operation.
- 6.4.2 With regard to landscape character, localised moderate significant effects would be experienced within the Upland Forest-Moor Mosaic landscape character type (LCT) during construction and operation. The extent of localised significant effects at both construction and operation would be restricted by landform and forestry cover, and therefore be limited to areas of open ground within the Upland Forest Moor Mosaic LCT up to approximately 2km distance from the Proposed Development. Within the wider extent of this LCT, the visibility and perception of the Proposed Development would be restricted by landform and vegetation, therefore would not result in significant effects beyond the local area described.
- 6.4.3 No other significant effects are predicted for the remaining 13 landscape character types or seascape units within the study area.

- 6.4.4 Of the 25 viewpoints assessed within the LVIA, significant visual effects would be experienced at six (VP8, VP9, VP10, VP13, VP15 and VP16). Moderate effects are anticipated at these viewpoints, except for VP13 during wind farm operation (where major effects are anticipated).
- 6.4.5 The six viewpoints include a location on the Kintyre Way long distance walking route (VP13: Kintyre Way north of Development Site). Visibility from and effects on the majority of the Kintyre Way and overall experience of the route would be limited and not significant, with VP13 representing a 'worst case' view on the Kintyre Way. The Proposed Development would not be visible from the majority of the route due to landform and would be further screened by forestry. Two other viewpoints on the Kintyre Way were assessed as part of the LVIA and effects were judged to be not significant.
- 6.4.6 Another of the six viewpoints judged likely to experience significant effects from the Proposed Development is Core Path C293 (VP16: North Muasdale), which is at a distance of c [3.3km] from the Proposed Development. The scale of change at VP16 is considered large due to the proximity of the viewpoint to the Proposed Development, and therefore the significance of effect is judged as moderate (significant). However, the viewpoint is not representative of Muasdale as a whole due to the presence of landform screening the Proposed Development from view.
- 6.4.7 The remaining four viewpoints predicted to experience significant effects are located on Gigha (VP8: Ardmish and VP9 South Pier) or within the Gigha Sound (VP10: Sound of Gigha from Gigha Ferry and VP15: Sound of Gigha from recreational watercraft). The Proposed Development makes use of an upland ridge to partially reduce visibility of the proposed turbines from these locations. However, the tops of turbines and associated aviation lighting would be apparent from these locations and as such significant effects are anticipated. These locations are intended to represent the worst-case views from Gigha and the Gigha Sound, with visibility and therefore effects from other parts of the island and surrounding waters are expected to be more limited.
- 6.4.8 It is notable that from the remaining 19 viewpoint locations, limited visibility, distance and/or the existing context results in a reduced nature of change and therefore no significant effects. Visibility of the Proposed Development from the Kintyre coast, where the majority of settlements and roads are concentrated, is limited and has been minimised through careful site selection and design. Therefore, for a large majority of those living and visiting Kintyre, the Proposed Development would have a limited presence visually and would often go unnoticed.
- 6.4.9 The cumulative baseline scenarios utilised in Chapter 7 of the EIAR (Volume 2a) would see the introduction of a number of additional wind farms, primarily within the upland interior of Kintyre. This would reinforce wind farms as an existing characteristic of the Upland Forest Moor Mosaic LCT and existing feature of views from many of the viewpoint locations. Significant cumulative effects on landscape character and visual receptors would largely be similar to significant non-cumulative effects discussed above. The exception being VP16,

where significant cumulative effects are not anticipated due to the absence of visibility of cumulative schemes from this location.

6.4.10 The design of the Proposed Development has evolved over a number of years as part of an iterative process which has aimed to provide an optimal design in environmental, as well as technical and economic terms. A number of mitigation measures have been embedded in the design of the Proposed Development in order to minimise the likely landscape and visual effects. The Design Statement accompanying the Section 36 Application, and Chapter 4: Reasonable Alternatives (EIAR Volume 2a) provide a thorough overview of both the site selection process and evolution of the Proposed Development design. Chapter 7 of the EIAR (Volume 2a) discusses these aspects with specific regard to the following key measures and their significance in minimising likely landscape and visual effects:

- Viewshed Analysis: this RWE designed process is described in Section 2.4 of this Planning Statement, and is fully expanded upon in the Design Statement. This approach fundamentally sought to reduce visual impacts in the site selection process and provided a platform from which more detailed design solutions could be considered to further mitigate landscape and visual impacts,
- Design Strategy: key design objectives were pursued as part of the Proposed Development, such as providing a turbine layout with a simple form, which relates to the landscape character of the Development Site and its surroundings and minimises impacts on the character of the local landscape,
- Site Specific Design Mitigation Measures Integral to Site Layout and Design: This considers the characteristics of the Development Site which influenced turbine location, for example, the exclusion of turbines areas of higher ground in the north and east of the Development Site. This, in combination with pulling back from the western extent allowed turbines to be positioned behind a ridge landform and brought into the spine of the peninsula. This process helped to ensure adverse effects on the most sensitive landscapes and the majority of settlement and roads have been avoided and/or reduced as far as possible,
- Mitigation of Access Works and Site Infrastructure: the measures embedded into proposed access and infrastructure arrangements are described and include the use of the existing forestry track network. This would reduce the creation of new tracks and removal of landscape features, and
- Forestry Management: The construction of the Proposed Development supports existing FLS proposals to enhance restocking plans to increase biodiversity through incorporation of broadleaved trees and to restore peatland habitat.

6.4.11 Through careful site selection and an iterative design process, the influence of the Proposed Development has been considerably restricted, particularly in relation to key landscape and visual constraints. Therefore, the Proposed Development would not result in significant effects on any nationally and locally designated landscapes. As a proposal for a commercial scale wind farm, it is inevitable there will be a small number of localised landscape and visual effects resulting from the Proposed Development, however due to the mitigation measures

incorporated through the robust design iteration and site selection process, it is not considered that the wider landscape and visual resource of the area would be significantly adversely affected. When balancing this against the wider benefits of the Proposed Development, the evident national planning policy support for onshore wind, and in the context of ambitious national energy policy, it is considered that there are no unacceptable adverse effects on landscape or visual receptors or amenity, and as such the Proposed Development complies with the policy requirements of the LDP (Policies LDP 6, LDP 3 and LDP 9) and LDP2 Proposed Policy 30.

6.5 Noise

- 6.5.1 The noise assessment presented in Chapter 8 of the EIAR (Volume 2a), confirms no significant effects of the Proposed Development (including cumulative effects) on any noise sensitive receptors. This takes into account construction and decommissioning noise, construction traffic noise and noise from the operational wind farm.
- 6.5.2 The Proposed Development therefore accords with the LDP, in particular Policy LDP 6 (see Table 6-3 in Chapter 6 of the EIAR: Planning and Energy Policy Context), and LDP2 Proposed Policy 30 (see Table 6-4 in Chapter 6 of the EIAR: Planning and Energy Policy Context).

6.6 Ecology

- 6.6.1 Chapter 9 of the EIAR (Volume 2a) presents a detailed report of the desk study and range of ecological studies conducted in order to ascertain the potential effects of the Proposed Development (construction, operation and decommissioning) on ecology. In particular, the following were considered:
- Blanket bog, Heath, Basic flush, Other semi-natural terrestrial habitats, and Watercourses,
 - Bats,
 - Otter,
 - Wildcat,
 - Pine marten,
 - Red squirrel,
 - Reptiles, and
 - Fish.
- 6.6.2 No significant adverse effects from the Proposed Development were identified. Significant beneficial effects were however identified in regard to the impact of habitat restoration (from forestry to blanket bog). In the absence of the Proposed Development this peatland

restoration would likely still be carried out by FLS, however should the Proposed Development be consented the Applicant will finance the restoration.

- 6.6.3 As a result of the above, the Proposed Development accords with Policies LDP STRAT1, LDP 3, LDP 6 and LDP 10 of the LDP (see Table 6-3 in Chapter 6 of the EIAR: Planning and Energy Policy Context). The enhancement of the natural environment within Argyll and Bute is also a 'Key Objective' of the LDP, which the Proposed Development contributes towards through the significant beneficial effect to blanket bog habitat.

6.7 Ornithology

- 6.7.1 No significant adverse effects were established through the ornithological assessment, presented in Chapter 10 of the EIAR (Volume 2a). As detailed, this was based on a desk-based assessment; baseline surveys conducted between 2014 and 2021; vantage point (VP) surveys between 2014 and 2021; and collision risk modelling (CRM), with a number of target species identified.
- 6.7.2 As no significant adverse effects were identified through the EIA, in relation to ornithology the Proposed Development accords with Policies LDP STRAT1, LDP 3, LDP 6 and LDP 10 of the LDP (see Table 6-3 in Chapter 6 of the EIAR: Planning and Energy Policy Context).

6.8 Geology, Hydrology and Hydrogeology

- 6.8.1 Due to the mitigation embedded into the design of the Proposed Development, no significant effects are considered likely on geology, hydrology or hydrogeology, including flood risk and peat.
- 6.8.2 In this regard, the Proposed Development therefore complies with Policies LDP STRAT1, LDP 3, LDP 6 and LDP 10 of the LDP as referenced in Table 6-3 in Chapter 6 of the EIAR: Planning and Energy Policy Context.

6.9 Archaeology and Cultural Heritage

- 6.9.1 Chapter 12 of the EIAR (Volume 2a) concludes that there will be no significant effects from the Proposed Development on archaeology or cultural heritage.
- 6.9.2 In this regard, the Proposed Development therefore accords with Policies LDP STRAT1, LDP 3, and LDP 6 of the LDP as referenced in Table 6-3 in Chapter 6 of the EIAR: Planning and Energy Policy Context.

6.10 Socio-Economics, Recreation and Tourism

- 6.10.1 No significant adverse effect to socio-economics, recreation or tourism is identified in Chapter 13 of the EIAR (Volume 2a). In this regard, there is therefore accordance with Policies LDP 5, LDP 6, and LDP 11 of the LDP as referenced in Table 6-3 in Chapter 6 of the EIAR: Planning and Energy Policy Context.
- 6.10.2 Further reference to the economic benefits of the Proposed Development is provided in Section 5 of this Planning Statement, see especially Net Economic Benefit.

6.11 Traffic, Transport and Access

- 6.11.1 Chapter 14 of the EIAR (Volume 2a) presents the results of the traffic, transport and access assessment. This utilises predicted traffic flows to represent a worst-case scenario over the Proposed Development's construction period. It applies 100% of the anticipated volume of construction traffic to each road link included in the study area in order to ensure the robustness of the assessment. However, this would not occur in reality, as the construction traffic route to and from the Proposed Development is expected to be more spread out between all road links included in the study area and would therefore not be concentrated only on one road link.
- 6.11.2 The assessment of traffic effects carried out under Chapter 14 of the EIAR (Volume 2a) assumes all construction materials for the upgrading of access tracks, turbine foundations, crane pads, substation and construction compounds will be brought to the Development Site from surrounding quarries. Under this worst-case scenario of no materials being sourced on site, no likely significant effects have been identified in relation to traffic, transport and access.
- 6.11.3 Mitigation measures have been proposed for implementation to further reduce the potential effects of the Proposed Development. These include the completion of a detailed Construction Traffic Management Plan in agreement with the planning and highway authorities. This will include, but not be limited to, detailing management measures for Heavy Goods Vehicles (HGVs), such as agreements and timing restrictions for construction traffic. This may include the restriction of the number of daily HGV vehicle movements, if deemed necessary by the planning authority.
- 6.11.4 Beyond this, it should also be noted that as much material as possible will be sourced from small temporary quarries located within the Development Site – subject to material appraisal – in order to reduce the number of HGVs associated with the delivery of construction materials. Based on the volume of stone that could be obtained from the temporary quarries, there is the potential to reduce HGV traffic by up to 75%. This would significantly reduce the potential environmental effects of construction traffic on study areas roads.
- 6.11.5 An assessment of the effects associated with the operation and decommissioning of the Proposed Development was scoped out of the EIA, in agreement with Argyll and Bute Council

and Transport Scotland. Chapter 14 of the EIAR (Volume 2a) does include a cumulative assessment of the Proposed Development, which considers the presence of other consented and committed wind farm developments in the area alongside the Proposed Development. The cumulative assessment concludes that all of the post-mitigation residual environmental effects associated with construction traffic are forecast to be not significant. The assessment considered effects across the categories: 'Severance', 'Fear and Intimidation', 'Accidents and Road Safety', 'Pedestrian and Cycle Amenity', 'Pedestrian and Cycle Delay', and 'Driver Delay'.

- 6.11.6 As described above in relation to the assessment of the Proposed Development itself at construction stage, the cumulative assessment also assumes all construction traffic appears on all road links within the study area. In practice, bespoke CTMP operating for each cumulative assessment site will ensure that construction traffic is pre-booked and routed to each site to ensure HGV movements are in accordance with forecast. Accordingly, it will not be the case that all traffic appears on all study areas road links, and as such the cumulative assessment represents a very precautionary forecast of potential environmental effects. Additionally, in the absence of detailed information on those wind farm schemes included in the assessment, the cumulative assessment assumes that the construction programmes from the schemes included in the assessment will overlap with that of the Proposed Development. As described above in relation to the construction stage assessment, the cumulative assessment similarly assumes offsite quarries will be utilised in lieu of onsite borrow pits and thus assumes HGV traffic associated with the Proposed Development will be of a higher volume than is likely.
- 6.11.7 As no significant adverse effects are anticipated, the Proposed Development is acceptable in the context of the aspirations of LDP policies LDP 6 and LDP 11.

6.12 Infrastructure and Telecommunications

- 6.12.1 Consultation has taken place with a number of infrastructure and telecommunications companies, as detailed in Chapter 15 of the EIAR (Volume 2a). This has ensured that all of the proposed wind turbines and the meteorological mast have been sited away from any telecommunications links at distances well in excess of required recommended separation / clearance distances.
- 6.12.2 As a result, no effects on existing infrastructure and telecommunications from the Proposed Development are anticipated, in accordance with Policies LDP 6 and LDP 11 of the LDP as referenced in Table 6-3 in Chapter 6 of the EIAR: Planning and Energy Policy Context.

6.13 Air Safeguarding

- 6.13.1 The potential effects of the Proposed Development on aviation and air safeguarding were investigated through desktop assessment and consultation with NERL (NATS (En Route) Public Limited Company), the Ministry of Defence, Glasgow Prestwick Airport, and Highlands and Islands Airports Limited; with the results presented in Chapter 16 of the EIAR (Volume 2a).
- 6.13.2 The assessment presented in Chapter 16 concluded that no effects on aviation stakeholders are anticipated from the Proposed Development. It is therefore considered that the Proposed Development is compliant with Policy LDP 6 with regard to aviation and air safeguarding.

6.14 Forestry

- 6.14.1 The Applicant has worked closely with FLS to ensure that the Proposed Development is considered acceptable by the landowner, which is reflected in the updated Carradale LMP (FLS, *unpublished*) which includes the Proposed Development, as detailed in Chapter 17: Forestry (EIAR Volume 2a).
- 6.14.2 As a result, the effects on forestry from the Proposed Development are minimal and result in beneficial effects through the restoration of peatland. The Proposed Development is therefore considered to comply with the requirements of the Control of Woodland Policy (Scottish Government, 2009), as well as Policy LDP 3 regarding the protection, conservation and enhancement of woodland, and Policy LDP 10 concerning the loss of trees and woodland.

6.15 Shadow Flicker

- 6.15.1 Chapter 18 of the EIAR (Volume 2a) presents the results of the shadow flicker assessment conducted for the Proposed Development. This concludes that there would be no significant effect from the Proposed Development on any sensitive receptor, including the dwelling 'High Clachaig'.
- 6.15.2 With regards to shadow flicker, the Proposed Development therefore accords with Policy LDP 6 of the LDP as referenced in Table 6-3 in Chapter 6 of the EIAR: Planning and Energy Policy Context.

7. Overall Conclusions

7.1 Overview

- 7.1.1 The purpose of this Planning Statement has been to describe how the Proposed Development responds to local and national planning policy. Through this there is a focus on environmental effects, the principles of sustainable development and the established need for renewable and onshore wind energy.
- 7.1.2 The Proposed Development comprises up to 12 wind turbines (seven with a maximum height of 185m and five with a maximum height of 200m), a battery storage facility (expected maximum 30 MW) and associated infrastructure. An operational period of 35 years is sought. The Development Site is located on the Kintyre peninsula within the Argyll and Bute Council area. The site is largely managed by FLS, who have an aim to ensure that the potential of the national forest estate is developed and managed in ways that contribute to the Scottish Government's renewable energy target.
- 7.1.3 The Applicant, who produces electricity from renewable energy sources and has a goal to become climate-neutral by 2040, identified the Development Site after a region-wide search which considered a range of technical, environmental, planning and commercial factors, including an Applicant-designed viewshed analysis model (see Design Statement for detail). This first identified that the Development Site was the most appropriate location to operate a wind farm of this size and scale, and has continued to conclude this when updated.
- 7.1.4 As detailed in the Design Statement, there have been eleven design review stages leading to the Proposed Development, including the Consented Development (14 wind turbines (13 with a maximum height of 126.5m and one with a maximum height of 115.5m) and associated infrastructure) which was granted consent in December 2019. The Proposed Development would result in an almost 100% increase in output in comparison to the Consented Development.

7.2 Environmental Effects

- 7.2.1 The environmental effects of the Proposed Development were established through the EIAR and its conclusions used within this Planning Statement to assess compliance with local planning policy. As evidenced through the conclusions of the EIAR, the Applicant has given due consideration to the requirements of Schedule 9 (3) of the Act. No significant adverse effects were found within any assessment within the EIAR, except for landscape and visual (Chapter 7; EIAR Volume 2a).
- 7.2.2 The LVIA assessed 14 landscape character types and 25 viewpoints and found significant adverse effects within only one landscape character type (Upland Forest-Moor Mosaic) and only 6 viewpoints: two of those viewpoints (VP13: Kintyre Way north of Development Site and

VP16: North Muasdale) are in close proximity to the Proposed Development, with the remaining four viewpoints within or near to Gigha (VP8: Ardmish, VP9 South Pier, VP10: Sound of Gigha from Gigha Ferry and VP15: Sound of Gigha from recreational watercraft). No other landscape character type or viewpoint was considered likely to experience a significant adverse effect. The cumulative assessment produced very similar results, except for VP16, where significant cumulative effects are not anticipated due to the absence of visibility of cumulative schemes from this location.

- 7.2.3 The adverse significant effects assessed within the LVIA are considered to represent a ‘worst case’ view, especially on the Kintyre Way and for those viewpoints within or near Gigha. On the Kintyre Way, the Proposed Development would not be visible from the majority of the route due to landform and would be further screened by forestry. Two other viewpoints on the Kintyre Way were assessed as part of the LVIA and judged to be not significant. In regard to Gigha, the Proposed Development makes use of an upland ridge to partially reduce visibility of the proposed turbines from these four viewpoint locations. However, the tops of turbines and associated aviation lighting would be apparent. For VP16, while the scale of change and its proximity to the Proposed Development give rise to a significant effect at this particular location, the viewpoint is not representative of Muasdale as a whole due to the presence of landform screening the Proposed Development from view.
- 7.2.4 From the remaining 19 viewpoint locations, limited visibility, distance and/or the existing context results in a reduced nature of change and therefore no significant effects. Visibility of the Proposed Development from the Kintyre coast, where the majority of settlements and roads are concentrated, has been minimised through careful site selection and design. Therefore, for a large majority of those living and visiting Kintyre, the Proposed Development would have a limited presence visually and would often go unnoticed.
- 7.2.5 The Proposed Development would not result in significant effects on any nationally and locally designated landscapes. As a proposal for a commercial scale wind farm, it is inevitable there will be a small number of localised landscape and visual effects resulting from the Proposed Development, however due to the mitigation measures incorporated through the robust design iteration and site selection process, it is not considered that the wider landscape and visual resource of the area would be significantly adversely affected.
- 7.2.6 The results of the LVIA conducted for the Consented and Proposed Developments are largely comparable, despite the larger tip height of the latter. In the Reporter’s recommendation to approve the application for the Consented Development, it was noted that of the few significant landscape and visual effects “*they are not unexpected or overly dominant for a commercial scale wind farm*” and so “*should be considered acceptable*” (DPEA, 2019).
- 7.2.7 When balancing the environmental effects of the Proposed Development with the need and support for renewable and onshore wind energy as established through national planning and energy policy in particular, but additionally through considering support within local planning policy, it is considered that the Proposed Development complies with all of the relevant policies within Argyll and Bute’s LDP and upcoming LDP2.

7.3 The Principles of Sustainable Development

7.3.1 It was established in Section 5.3: 'Weight of National Policy' of this Planning Statement that the presumption in favour of development that contributes to sustainable development, as introduced by SPP, is a significant material consideration in regard to the Proposed Development, due primarily to the age of the LDP (although it is noted LDP2 is expected to be adopted in 2023).

7.3.2 For a development to be considered unsustainable, any negative effects on the principles would, on planning balance, need to significantly and demonstrably outweigh the positive contribution made by that development.

7.3.3 The relevant sustainable development principles were explored in Section 5.5 and it was shown that the Proposed Development accords with each of the following principles:

- Net economic benefit,
- Economic issues, challenges and opportunities,
- Good design and qualities of successful places,
- Delivery of infrastructure,
- Climate change mitigation and adaptation,
- Health and well-being,
- Principles for sustainable land use,
- Cultural heritage,
- Natural heritage, and
- Waste

7.3.4 It was therefore concluded that the Proposed Development would contribute to sustainable development, which, if SPP's presumption in favour of sustainable development were applied to the Proposed Development, tilts the planning balance in favour of approval.

7.4 Need for Renewable and Onshore Wind Energy

7.4.1 Since the Scottish Government declared a climate emergency in April 2019, national energy and planning legislation and policies have been, or are in the process of being, updated to reflect this. Whilst there was national support for renewable energy, including onshore wind, prior to this, this commitment has been strengthened in order to meet the 2045 net zero emissions target.

7.4.2 Updated policy includes the Scottish Energy Strategy, which was originally published in 2017 (Scottish Government, 2017b) and was updated through a Position Statement in 2021

(Scottish Government, 2021e) to reflect the updated net zero target. Both documents state the Scottish Government's commitment to onshore wind in order to help meet this target.

- 7.4.3 Related to the Energy Strategy, the Onshore Wind Policy Statement (Scottish Government, 2017a) is in the process of being updated, with a draft Onshore Wind Policy Statement Refresh released in October 2021 for consultation (Scottish Government, 2021d). The latter includes the ambition to secure an additional 8 to 12 GW of installed onshore wind capacity by 2030, which at its upper end would almost double the total existing operational renewable electricity capacity in Scotland, which was recorded at 12.2 GW gigawatts by the end of September 2021 (Scottish Government, 2021d). In order to achieve this target, a large number of new and repowered onshore wind energy developments will have to be approved in the first half of this decade.
- 7.4.4 In support of the Proposed Development, which almost doubles the output of the Consented Development, the Onshore Wind Policy Statement and its draft Refresh also support the principle of larger, more efficient turbines emerging through enhancements in technology.
- 7.4.5 In regard to national planning policy, the Proposed Development is strongly supported by NPF3 (Scottish Government, 2014b) as onshore wind is seen as important element to the future energy mix. It is also appropriate to its location outwith internationally and nationally protected areas, avoiding those recognised as being most sensitive.
- 7.4.6 However, the draft NPF4 (Scottish Government, 2021c) which, when finalised and adopted later in 2022, will replace NPF3 and SPP, provides even stronger support for the Proposed Development. Firstly, through its identification of the western coastline of Kintyre falling within the 'north and west coast innovation' area, which is recognised as being at the forefront of efforts to reach net zero emissions by 2045 and also as being one of the "*most renewable energy rich localities in Europe*". (p. 12)"
- 7.4.7 The draft NPF4 also identifies developments, such as the Proposed Development with more than 50 MW of renewable electricity generation and battery storage, as national developments, which are considered of "*national importance*" (p. 44). The need for developments of this type is identified as "*fundamental to achieving a net zero economy and support[ing] improved network resilience in rural and island areas*" (National Development 12; p. 59).
- 7.4.8 Policy 2 ('Climate Emergency') of draft NPF4 also sets out the requirement that planning authorities give "*significant weight*" to the global climate emergency when considering development proposals (p. 69). As the Development Site has previously been deemed to be capable of facilitating a commercial scale wind farm in the form of the Consented Development, and the Proposed Development would increase the generation capability of a wind farm on the Development Site by almost 100% without a corresponding increase in the significance of environment effects, this 'significant weight' would apply to the Proposed Development.

- 7.4.9 Lastly, Policy 19 ('Green Energy') extends clear and direct support for onshore wind, directing authorities to ensure that an area's full potential for renewable electricity is achieved, supporting energy storage with new renewable energy developments, supporting the repowering, extension or expansion of existing wind energy development, and considering sites with extant wind farm consents to be suitable for use in perpetuity.

7.5 Conclusion

- 7.5.1 The principle and acceptability of locating commercial-scale onshore wind development at the Development Site should be considered unchanged from the Consented Development. However, the energy and climate policy context and consequently support for onshore wind development has materially strengthened. The climate emergency declaration, associated and more stretching emissions targets (to be achieved sooner), and updated or upcoming energy and planning policies reflect a significant shift since the Consented Development gained approval in 2019. This in turn shifts the planning balance further in favour of the Proposed Development. Finally, the benefits of the Proposed Development are materially greater than the Consented Development, with almost double the generation capacity of the Development Site through utilising fewer, taller wind turbines and the inclusion of a battery storage facility, helping to balance electricity demand and supply, adding resilience to the energy system .
- 7.5.2 The case for granting consent is further strengthened when considering the significant adverse environmental effects predicted in the EIAR, which are all centred on relatively few landscape and visual effects and are largely comparable to the Consented Development, and which were considered acceptable for a commercial scale wind farm at the time of consent (DPEA, 2019).
- 7.5.3 The Proposed Development has additionally been assessed as contributing to the principles of sustainable development, which reflects the positive outcomes that this project would have in response to the climate emergency, the 2045 net zero emissions targets, and the upcoming onshore wind energy target seeking to almost double the total installed onshore wind capacity by 2030.

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