

Planning and Access Committee

Meeting: Monday 30th August 2021

Agenda item: 5

SUBMITTED BY:	Director of Place
APPLICATION NUMBER:	19/02544/PP (Argyll & Bute Council reference)
APPLICANT:	Muirden Energy LLP
LOCATION:	Creag Dhubh Windfarm Creag Dubh North East Of Strachur Village Argyll And Bute situated over 1km to the northeast of the village of Strachur, with the proposed wind turbines located approximately 3km from the village.
PROPOSAL:	Construction of wind farm comprising of 9 wind turbines (maximum blade tip height 145m), formation of 5.6km new access track, erection of substation building, welfare building, temporary construction compound and 2 borrow pits
COMMUNITY COUNCIL AREA	Strachur
CASE OFFICER:	Name: Amanda Muller Tel: 01389 727721 E-mail: amanda.muller@lochlomond-trossachs.org

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1. Summary and reason for presentation

- 1.1. The proposed development relates to a consultation by Argyll and Bute Council as a neighbouring planning authority.
- 1.2. The National Park's consultation response is being reported for Committee's consideration, due to the anticipated significant adverse effects on the Special Landscape Qualities for the National Park.
- 1.3. The proposed development is for the erection of 9 wind turbines with a maximum blade tip height 145m and associated formation of 5.6km new access track and erection of substation building.
- 1.4. The development is situated approximately 1km from the National Park boundary and is 3km from the village of Strachur in the Cowal peninsula.

2. Recommendation

2.1. That Members:

APPROVE the contents of the report and its submission to Argyll and Bute Council as the National Park Authority's consultation response on the planning application. The response concludes that the National Park Authority **objects** to the proposal for the following reasons:

- The proposal will result in a significant adverse effect on the Special Landscape Qualities of the Argyll Forest area of the National Park by introducing a new built landscape feature to the Landscape Character Type (LCT) of Steep Ridges and Mountains.
- The proposed development will have a significant adverse effect on visual amenity affecting views from the Arrochar Alps, Ben Donich and Beinn Bheula and the Cowal Way Long Distance Route approaching this gateway into the Park.
- 3. Site Description
 - 3.1. The site is located in Argyll and Bute, situated approximately 1km from the edge of the National Park boundary with the proposed wind turbines located approximately 3km from the village of Strachur.
 - 3.2. The wind farm would be located on the slopes of Creag Dhubh, 484m AOD at its summit, and partially below Creag an t-Suidheachain, across an area of commercial forestry and open moorland. There are several waterbodies within close proximity of the proposed turbine locations that drain the site to the River Cur, with the most notable entitled the Allt Mor.
 - 3.3. The site is located approximately 8km south of the operational Clachan Flats wind farm on the west of Loch Fyne, which is the closest proposed, consented or operational wind farm consisting of 9 turbines at a height of 93m to blade tip.



Figure 1- Location of proposed Creag Dhubh Wind Farm

Figure 2 - Precise location of each of the 9 turbines



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Turbine ID	Hub height (m)	Blade tip height (m)
T1	84.6	130.6
T2	98.4	144.4
Т3	78.3	124.3
T4	68.9	114.9
T5	84.6	130.6
Т6	68.9	114.9
T7	78.3	114.9
Т8	78.3	124.3
Т9	84.6	124.3

4. Description of Proposal

The main components of the proposed development

- 4.1. 9 turbines up to 145m to blade tip and each with a rated output of up to 4MW, giving a total output of up to 36MW;
- 4.2. 9 crane hardstandings with dimensions of 45m x 23m;
- 4.3. Approximately 5.6km of new permanent access tracks, including 1 turning area, and upgrades to 5.9km of existing forestry tracks;
- 4.4. Electrical and communication underground cables running along sections of the access track;
- 4.5. A substation and control building.

Proposed Community Benefits

4.6. The applicant (Creag Dhubh Renewables LLP) is proposing to provide community benefits: stating an intent to offer opportunities to the local communities of Strachur and Lochgoilhead. As well as a commitment to shared ownership of up to 10% of the equity in the proposed development. In addition they propose to contribute to an annual community fund for the local community equal to £5,000 per MW potentially generating an annual income of up to £180,000. The fund would be managed with long-term goals in mind to deliver meaningful benefits to the community.

Economic factors

- 4.7. The applicant estimates that the proposal could create 127 man year equivalent jobs and an investment of £13.1m in Scotland during the development and construction phase, including 91 man year equivalent jobs and investment of £17.9m in Argyll and Bute.
- 4.8. During operational phase the applicant anticipates a total of 15 man year equivalent jobs and generate £1.26m per annum for the Scottish economy during the operational phase, including 8 man year equivalent jobs and £0.53m in Argyll and Bute.

5. Summary of Supporting Information (submitted to Argyll and Bute Council)

Environmental Impact Assessment Report

- 5.1. The Environmental Impact Assessment Report prepared by the applicant was submitted with the application to Argyll and Bute.
- 5.2. The statement includes a Landscape and Visual Impact Assessment (LVIA). This document has been prepared by the applicant in accordance with best practice guidelines.
- 5.3. The LVIA sets out the potential landscape and visual impacts arising from the proposed windfarm. An LVIA is required to present an analysis of the impact the proposed windfarm will have on the character of the different landscape types and designated areas within a 30km radius of the site. It also sets out an analysis of the visual impact of the proposed development in relation to important viewpoints and routes. This presents an indication of the potential impact of the windfarm on visitor experience and residential amenity.
- 5.4. The LVIA includes a figure showing the Zone of Theoretical Visibility (ZTV) (attached in Appendix 2), this shows the extent of theoretical visibility of the wind turbines and takes account of relief and topography, but not of trees, buildings and other land cover. As such, the ZTV can be considered to present a 'worst case scenario' as views of wind turbines can be wholly or partially obscured by vegetation or buildings.
- 5.5. The LVIA and the ZTV along with the applicant's assessment are reviewed as part of the National Park Authority's assessment on the impact of this proposal in relation to the National Park.
- 5.6. The Environmental Impact Assessment Report and any associated documents can be viewed online via <u>Argyll and Bute Council's planning portal</u> by entering the planning reference 19/02544/PP.

6. Policy context

Determining Planning Authority

Argyll and Bute Council

- 6.1. The application will be determined by Argyll and Bute Council in accordance with the current Argyll and Bute Local Development Plan and supporting documents.
- 6.2. Argyll and Bute Landscape Wind Energy Capacity Study 2012 (updated 2017) is a study prepared by Landscape Architects and provides the evidence base that informed Argyll and Bute Local Development Plan windfarm policies and is used to help assess windfarm proposals against LDP policies. The study gives a broad overview of the existing characteristics and their capacity to accommodate development.
- 6.3. The National Park's response will be given due consideration along with those of the other statutory consultees.

National Policy

Scottish Planning Policy (2014) and National Planning Framework 3

- 6.4. Scottish Planning Policy (SPP) and the National Planning Framework 3 have a supportive stance towards renewable energy development. National Planning Framework 3 recognises the contribution that on shore windfarms has and will continue to contribute to meeting Scotland's electricity demand. However, any energy generation should safeguard the environment and communities.
- 6.5. SPP (published June 2014) paragraph 212 states that any development which affects a National Park should only be permitted if the objectives of designation and the overall integrity of the area will not be compromised or any significant adverse effects of the effects on the qualities for which the area has been designated are clearly outweighed by social, environmental or economic benefits of national importance.

National Park (Scotland) Act 2000

- 6.6. Section 14 of the National Parks (Scotland) Act 2000 requires public bodies to have regard to the National Park Plan when exercising their functions so far as affecting the National Park and as such there is a requirement in determining the proposal to take the Park Authority's views on impacts into account.
- 6.7. The National Park Partnership Plan and Local Development Plan may act as material consideration where proposals outside of the National Park boundary affect the National Park Special Qualities.

The four statutory aims of the National Park are:

- 1. to conserve and enhance the natural and cultural heritage of the area;
- 2. to promote sustainable use of the natural resources of the area;
- 3. to promote understanding and enjoyment (including enjoyment in the form of recreation) of the special qualities of the area by the public; and
- 4. to promote sustainable economic and social development of the area's communities.

National Park Partnership Plan (2018-2023)

6.8. The National Park Partnership Plan shows general support for a low carbon economy and emphasises the importance of protecting the Park's special landscapes.

Outcome 2: Landscape Qualities under Conservation Priority 2.1 states: "The National Park Authority, and its partners, will work to conserve and enhance the special landscape and cultural heritage qualities of the area by; Ensuring that developments and projects recognise the need to protect and, where possible, enhance the qualities of wildness, tranquillity, dark skies and the historic environment"

Local Development Plan (2017-2021)

- 6.9. The Local Development Plan (LDP) sets out the vision for how the National Park should change over the next 20 years. The LDP covers the period from 2017 to 2021 and is updated every 5 years. The following LDP Policies are relevant to the determination of this application:
 - Renewable Energy Policy 2: Renewable Energy Developments Adjacent to the National Park

'The National Park Authority, as a statutory consultee, will support renewable energy developments adjacent to the Park where:

- a) They will not individually, or cumulatively with other developments or proposals, have a significant adverse visual impact on the landscape setting of the National Park and its principle gateways, and
- b) They do not result in significant adverse impacts upon protected sites, species or biodiversity interests within the National Park as a result of cross boundary effects, and
- c) They do not result in significant adverse impacts by virtue of proximity, noise generation, shadow flicker, lighting or visual impact.

The National Park Authority will object to renewable energy developments outwith the Park where these criteria have not been met'.

- 6.10. In summary, for the assessment of the proposal criteria b) is not relevant as the development is sufficiently distant from the National Park to have no cross boundary effects on protected sites or species within the National Park.
- 6.11. The key policy criterion in the assessment for this proposal is therefore Renewable Energy Policy 2 c) in relation to visual impact.

Planning Guidance: Renewable Energy

- 6.12. The relevant Planning Guidance for this case is the National Park Authority's Renewable Energy Planning Guidance. This provides additional details and guidelines to be considered when responding to Wind Farm Development adjacent the National Park Boundary.
- 6.13. This further emphasises the need for proposals outwith the National Park to consider the visibility of the development from the National Park, and its impact on the setting of the Park due to visual intrusion and its enjoyment by residents and visitors.
- 6.14. An assessment is expected to follow best practice guidelines, which includes assessing cumulative impact by taking account of other large scale developments including but not exclusively wind farms within a 60km radius.

7. National Park Authority's planning assessment

Landscape Considerations

Argyll and Bute Landscape Wind Energy Capacity Study (LWECS)

7.1. Argyll and Bute Council and NatureScot commissioned this study to inform strategic planning for wind farm development. This study indicates that where a landscape character type/area is identified as being of high landscape and visual sensitivity it is concluded that large scale windfarm development cannot be accommodated in the landscape character area without significant and/or visual effects.

Landscape Character Assessment

- 7.2. This is the key tool for understanding the landscape and is the starting point for baseline surveys. Landscape Character Type (LCT) defines what is unique about an area. This takes into account existing landforms, field patterns, tree cover, settlements etc. Each potential impact on landscape character must be taken into consideration in order to assess the magnitude of change that could occur.
- 7.3. The National Park Authority's assessment will make reference to the Landscape Character Types (LCT) as identified in the LWECS.
- 7.4. The proposed windfarm is within Landscape Character Type (LCT) 'Steep Ridgeland & Mountains' (1) The LLTNPA borders this part of Argyll and Bute.
- 7.5. The LWECS guidance on development for the LCT 'Steep Ridgeland & Mountains'(1) recommends that turbines greater than 50 metres high would have a high landscape and visual sensitivity maximum turbine height and states that there is no scope to accommodate larger typologies (>50 metres high) within this landscape character without significant effects occurring on a number of key sensitivity criteria.

Special Qualities

- 7.6. The <u>Special Landscape Qualities of Loch Lomond and Trossachs National Park</u> <u>Report 2010</u> commissioned by NatureScot defines special landscape qualities as the characteristics that, individually or combined, give rise to an area's outstanding scenery.
- 7.7. The general special landscape qualities which apply to the entire park include:
 - A world renowned landscape famed for its natural beauty;
 - Tranquillity;
 - Famous through routes; and
 - The easily accessible landscape splendour.
- 7.8. The specific Special Landscape Qualities relevant to Argyll Forest for this application are :
 - Arrrochar's mountains and distinctive peaks and
 - A remote area of hills and glens.

Landscape assessment by NatureScot

- 7.9. A detailed Landscape assessment undertaken on behalf of NatureScot for this proposal have been shared with the National Park Authority as part of an established case work agreement. NatureScot are also a statutory consultee. Advice has been provided on the implications the proposal would have on the National Park's Special Landscape qualities and any effects on landscape and visual receptors in relation to the Park.
- 7.10. NatureScot have submitted an objection in their response to Argyll & Bute Council to this proposal on account of the significant adverse effects on views and the Special Landscape Qualities (SLQ's) of the Loch Lomond and Trossachs National Park.
- 7.11. The Special Landscape Qualities are specifically referenced by NatureScot. These qualities apply to the National Park and the areas adjacent to National Park as they seek to capture the experiential qualities of those visiting the Park. The landscape advice by NatureScot concludes that the turbines from Creag Dhubh proposal would significantly affect the specific landscape area of Argyll Forest notably *Arrochar's mountainous and distinctive peaks* and *remote area of high hills and deep glens.*
- 7.12. NatureScot also consider that the proposal would significantly adversely affect panoramic views from the central Arrochar peaks:
 - Ben Arthur (the Cobbler)
 - Ben Ime (Munro) and
 - Ben Narnain (Munro)
- 7.13. The photomontage provided for Ben Arthur (viewpoint 13, attached as Appendix 5) demonstrates the full visibility of all 9 turbines at a distance of 11km.
- 7.14. There would also be significant visual effects from the periphery of the Arrochar Alps area, where many of the closest summits and ridges would have views of the turbines as represented by for example Beinn Bheula VP5 and Ben Donich VP8 (attached as Appendix 3 and 4).
- 7.15. NatureScot summarise that the location and scale of Creag Dhubh wind farm represents a step change in the proximity, prominence and visual intrusion of wind farms on the western part of the National Park, giving rise to significant adverse effects on the Park's Special Landscape Qualities (SLQs). Noting that there would be significant effects from the slopes and summits of some of the Park's most distinctive and rugged mountain peaks in the very popular Arrochar Alps area, and the areas that form a western gateway into the Park near Strachur.
- 7.16. The location of these turbines, so close to the Park boundary, would highlight the north western boundary of the Park, interrupting the panorama and significantly compromising the experience of these panoramic views to the west at distances of around 3-15km.
- 7.17. Additionally the SLQ "*a remote area of high hills and glens*" and also "*the easily accessible landscape splendour*" would be affected by the proposal as these effects are considered to be significant on the appreciation of these SLQs.

Assessment by the National Park Authority

- 7.18. The viewpoint analysis submitted as part of the Environmental Impact Assessment Report shows that there would be visibility of all 9 turbines from the Arrochar Alps. The magnitude of change would be substantially significant, resulting in an alteration of the existing character of the landscape by introducing large scale turbines. The turbines will be evident from the summit slopes and upper western slopes of the Cobbler, Ben Ime, and Ben Narnain affecting panoramic views. This is evidenced by Viewpoint 13 at the Cobbler and the ZTV (Appendix 2 and 5). Currently visitors to the Arrochar Alps experience panoramic views across the National Park and outwith across the landscape character of *Highland Summits* to *Steep Ridges and Mountains* with no interruption from operational windfarms such as Clachan Flats. This is due to the smaller scale and larger distance of these windfarms compared to the current proposal, from the National Park.
- 7.19. The landscape of the development area is characterised as that of mountains and long ridges with sea lochs extending into long glens and the Park Authority agrees with the *Argyll and Bute Landscape Capacity Assessment for Windfarm Development (LWECS, 2017*) that this sensitive landscape area has no capacity for turbines greater than 50m in height.
- 7.20. Walkers to Beinn Bheula at 5.5km from the proposal would also have sequential views of the turbines occupying a wide field of view with additional significant visual effect at the summit with all nine turbines visible (Appendix 3). The turbines would be dominantly in view for walkers to Ben Donich from the lower western southern slopes to the summit with turbines occupying a relatively wide extent of the surrounding landscape.
- 7.21. The National Park Authority agrees with the points made by NatureScot and concludes that: There will be significant adverse effects on key recreational views in this area and on the Special Landscape Qualities of the National Park; There would be significant effects on visual amenity at Ben Donich, Beinn Bheula, The twin peaks of the Cobbler, Ben Ime and Ben Narnain of the Arrochar Alps and Beinn an Lochain northwest of the Rest and Be Thankful. (The wireframes and photomontages for Ben Donich, Beinn Bheula and Ben Arthur can be found in the Appendices). Walkers from Beinn an Lochain to the Coire a' Chuire ridge north of Beinn an Lochain would have uninterrupted western views of the turbines and there would be significant visual effects on the southern section of the Cowal Way approaching the western gateway into the National Park.
- 7.22. The location of the turbines at just over 1km from the Park boundary at a height of up to 145m (blade tip) would be significantly closer to the Park boundary than other operational wind farms around Loch Fyne and be significantly larger in height resulting in a step change in the proximity, prominence and visual intrusion of wind farms on this western part of the Loch Lomond and Trossachs National Park.



Figure 3 -LVIA photomontage of summit views to the proposal

7.23. The National Park Authority does not agree with the conclusion of the applicant's LVIA assessment which has assessed the effects to the Special Landscape Qualities to be not significant. The National Park Authority has assessed the proposal and is of the opinion that this will have significant detrimental effects to the experience of views of walking routes popular with visitors and residents in the Park Authority.

7.24. It is also noted that all operational windfarms around Loch Fyne are below 100m blade tip height and significantly further from the NPA boundary than the current proposal. Existing operational windfarms are a distance of 8 to 18km from the proposed windfarm and not readily evident from the National Park summits as opposed to Creag Dhubh which is just over 1km from the National Park boundary. Table 2 and Figure 3 further demonstrate the distance and height difference of existing windfarms in relation to the Creag Dhubh proposal.

Windfarm	Distance from nearest turbine of the proposed Creag Dhubh	Blade tip height	No of turbines
Clachan Flats	8km	93m	9
Bein Ghlas	46km	61m	16
An Suidhe	11km	83m	24
Cruach Mhor	18km	71m	35

Table 2- Cumulative windfarm in LVIA Study



Figure 4- Cumulative Wind Farms in LVIA Study as listed in Table 2

8. Summary and Conclusions

- 8.1. In conclusion, the proposal is considered to be contrary to the National Park Authority's LDP Policy REN 2 Renewable Energy Development Adjacent to the National Park as it does not meet the policy criteria. The policy states that 'the National Park Authority, as a statutory consultee, will support renewable energy developments adjacent to the Park where:
 - They will not individually, or cumulatively with other developments or proposals, have a significant adverse visual impact on the landscape setting of the National Park and its principle gateways, and ...
 - The National Park Authority will object to renewable energy developments outwith the Park where these criteria have not been met.'
- 8.2. The National Park Authority consider that the proposal will have a significant detrimental effect on the experience of views of walking routes popular with visitors and residents in the Park Authority. Furthermore there will be significant adverse effects on the Special Landscape Qualities of the National Park.
- 8.3. The location of the turbines at just over 1km from the Park boundary at a height of up to 145m (blade tip) would be significantly closer to the Park boundary than other operational wind farms around Loch Fyne and be significantly larger in height. It is concluded that the proposal would result in a step change in the proximity and prominence of wind farms on this western part of the National Park and present a significant visual intrusion.
- 8.4. It is therefore recommended that an objection to the proposal is submitted to Argyll and Bute Council on the grounds that:
 - The proposal will result in a significant adverse effect on the Special Landscape Qualities of the Argyll Forest area of the National Park by introducing a new built landscape feature to the Landscape Character Type (LCT) of Steep Ridges and Mountains.
 - The proposed development will have a significant adverse effect on visual amenity affecting views from the Arrochar Alps, Ben Donich and Beinn Bheula and the Cowal Way Long Distance Route approaching this gateway into the Park.

9. Appendices.

List of Appendices:

Appendix 1 Site Location Plan Scale 1:75,000

Appendix 2 Zone of Theoretical Visibility (ZTV) to Tip Height (Scale 1:90,000)

Appendix 3 Beinn Bheula Viewpoint 5

Appendix 4 Ben Donich Viewpoint 8

Appendix 5 Ben Arthur Viewpoint 13

Appendix 6 Balliemeanoch Viewpoint

Appendix 1:Site Location Plan Scale 1:75,000



National Park Authority Planning & Access Committee 18 30th August 2021



Appendix 2: Zone of Theoretical Visibility (ZTV) to Tip Height (Scale 1:90,000)

Appendix 3: Viewpoint 5 Beinn Bheula



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FIGURE: 7.30A VIEWPOINT 5: BEINN BHEULA DATE: 17/05/2018 TIME: 14.25 GRID REFERENCE: 215458 698320 ELEVATION: 779m AOD

BEARING TO SITE CENTRE: 34(DISTANCE TO NEAREST TURBI CAMERA HEIGHT ABOVE GRO



PROJECT: CREAG DHUBH WIND FARM FIGURE: 7.30F VIEWPOINT 5: BEINN BHEULA DATE: 17/05/2018 TIME: 14.25 GRID REFERENCE: 215458 698 ELEVATION: 779m AOD

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Appendix 4: Viewpoint 8 Ben Donich



National Park Authority Planning & Access Committee 23 30th August 2021









National Park Authority Planning & Access Committee 26 30th August 2021





PROJECT: CREAG DHUBH WIND FARM HGURE: 7.38F VIEWPOINT 13: BEN ARTHUR DATE: 23/05/2018 TMB: 14.40 GIED REFERENCE: 225905 705848 ELEVATION: 878m AOD

NGARING TO SITE CENTRE: 262* DISTANCE TO NEAREST TURBINE: 11352m CAMERA NEIGHT ABOVE GROUND: 1.5m CAMERA: Canon EOS 5D LINS: Somm (Canon EF 50mm 1/1.8) HOISZONTAL FILLD OF VIEW: 53.5* VERTICAL RELD OF VIEW: 18.2* PROJECTION: Planar PRINCIPAL DISTANCE: 812.5mm

Appendix 6: Viewpoint 2 A815 Balliemeanoch

National Park Authority Planning & Access Committee 29 30th August 2021



CLIENT: CREAG DHUBH RENEWABLES LLP





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DATE 11.2

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PROMITTION Plater PRINCIPAL DISTANCE F12.5mm

Links to Documents

National Park Partnership Plan 2018-2023

https://www.lochlomond-trossachs.org/park-authority/what-we-do/national-park-partnership-plan-2018-2023/

Loch Lomond and the Trossachs Local Development Plan 2017-2021 https://www.lochlomond-trossachs.org/planning/planning-guidance/local-development-plan/

Argyll and Bute Wind Energy Capacity Study (updated 2017)

https://www.argyll-bute.gov.uk/planning-and-environment/landscape-wind-energy-capacity-study

Landscape Character Assessment for Argyll and Firth of Clyde, Scottish Natural Heritage, 1996 https://www.nature.scot/naturescot-review-78-landscape-assessment-argyll-and-firth-clyde

The Special Landscape Qualities of Loch Lomond and Trossachs National Park Report, SNH and LLTNPA, 2010 https://www.lochlomond-trossachs.org/park-authority/publications/evaluation-special-qualities-loch-lomond-trossachs-national-park/