

Agenda Item 4: Committee Report – Giant’s Burn Windfarm

Planning and Access Committee

24 November 2025

Paper for approval

SUBMITTED BY:	Director of Place
APPLICATION NUMBER:	ECU00005007 (Scottish Government Energy Consents Unit reference) EXT/2025/0011
APPLICANT:	GB Wind Farm Ltd.
LOCATION:	Giant’s Burn Windfarm, Dunoon
PROPOSAL:	Proposed windfarm comprising of up to 7 wind turbines, of which up to 5 are 200m to tip and up to 2 are 180m to tip, with BESS and associated infrastructure
NATIONAL PARK WARD:	N/A
COMMUNITY COUNCIL AREA	Kilmun CC, Dunoon CC and Sandbank CC
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1. Summary and Reason for Presentation

- 1.1. This report relates to a consultation by the Scottish Government Energy Consents Unit (ECU) on an application submitted on 15 July 2025 for the construction of a windfarm at Giant's Burn, Dunoon. The proposed development is located approx. 2.7km southwest of the Loch Lomond and Trossachs National Park boundary.
- 1.2. The proposed development is "Strategic Renewable Energy Generation and Transmission Infrastructure" which is categorised as a National Development in National Planning Framework 4 (NPF4). National Developments are significant developments of national importance that will help deliver the Spatial Strategy
- 1.3. Applications for the construction of electricity generating stations with a capacity above 50 megawatts (MW) are made to the Scottish Ministers and administered by the Energy Consents Unit rather than by the Planning Authority.
- 1.4. The National Park Authority has been consulted as a neighbouring Planning Authority. 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 National Park Authority's views into account.
- 1.5. The development proposed is for the erection and 50-year operation of up to 7 wind turbines. Up to 5 turbines would be up to 200m in height (to blade tip) and up to 2 are proposed to be 180m. A total site capacity of over 73MW. Associated infrastructure would include turbine compound areas, new and on-site tracks, battery energy storage system (BESS), substation, forest felling / restocking. Access to the proposed development would be from the A83 / along the A815/B836 northwest of Dunoon. The route along the A815 which skirts the length of Loch Eck will require extensive woodland removal, trimming and potential rock refacing. Approximately 10 km of new and upgraded access tracks would be constructed. As the turbines would be over 150 m in height visible aviation lighting would be required. In accordance with requirements of the Civil Aviation Authority (CAA), it is proposed three of the seven proposed turbines would require to be lit with visible lights on their hubs.
- 1.6. The proposed development would be located within the administrative area of Argyll and Bute Council. The National Park's response to this consultation is being reported for the Planning Committee's consideration because it is proposed to object to the application given the anticipated significant adverse effects of the proposal on the Special Landscape Qualities and the overall integrity of the National Park.

2. Recommendation

- 2.1. That Members: **APPROVE** the contents of this report for submission to the Scottish Government Energy Consents Unit, as the National Park Authority's consultation response on the application. The response concludes that the National Park Authority objects to the proposal for the following reasons:

- (i) **Significant change in scale and proximity of windfarm development to the National Park.** The proposal would introduce a windfarm development of significant scale (up to 200m in height) close to (2.7km from) the National Park boundary.
- (ii) **Significant adverse effects on the Special Landscape Qualities of the National Park.** Such a large-scale wind farm in the open upland area within the Cowal Hills behind Dunoon will result in significant adverse effects on the Special Landscape Qualities of the National Park.
- (iii) **Significant effects on visual amenity.** The wind farm would be a dominant feature that would have a significant adverse impact upon the open views and visual amenity for residents, visitors and recreational users in the southwestern area of the National Park.
- (iv) **Significant effects on landscape character.** The windfarm will have significant adverse effects on the landscape character of the Steep Ridgeland and the adjacent Mountains Glens Landscape (Landscape Character Type 4) covering Strath Eachaig, Kilmun, Strone, and southern edge of Loch Eck.
- (v) **The proposal is contrary to National Planning Framework 4, Policy 4 Natural Places part c).** The location, scale, type and proximity of the windfarm to the National Park boundary will compromise the objectives and integrity of the designation and the significant adverse effects are not outweighed by any social, environmental or economic benefits of national importance.

3. Background

Site description

- 3.1. The site comprises an area of approximately 700 hectares (ha) of land located northwest of the town of Dunoon within Argyll and Bute Local Authority Area.



Figure 1 Site Location Plan

- 3.2. **Figure 1** identifies the site location in red and the National Park boundary is highlighted in yellow. The site lies approximately 2.7 km to the southwest of the National Park boundary at its nearest point. It is set within a landscape character type defined as Steep Ridgeland and Mountains and includes the hills of Bishop's Seat (504m) and Giant's Knowe.
- 3.3. In addition to the proximity to the National Park boundary, the proposal is situated approximately 5km from Benmore Gardens (an Inventory Designed Landscape). The historic shoreline from Kilmun to Strone is situated approximately 3km from the proposed development and contains several listed buildings (**Figure 2**).

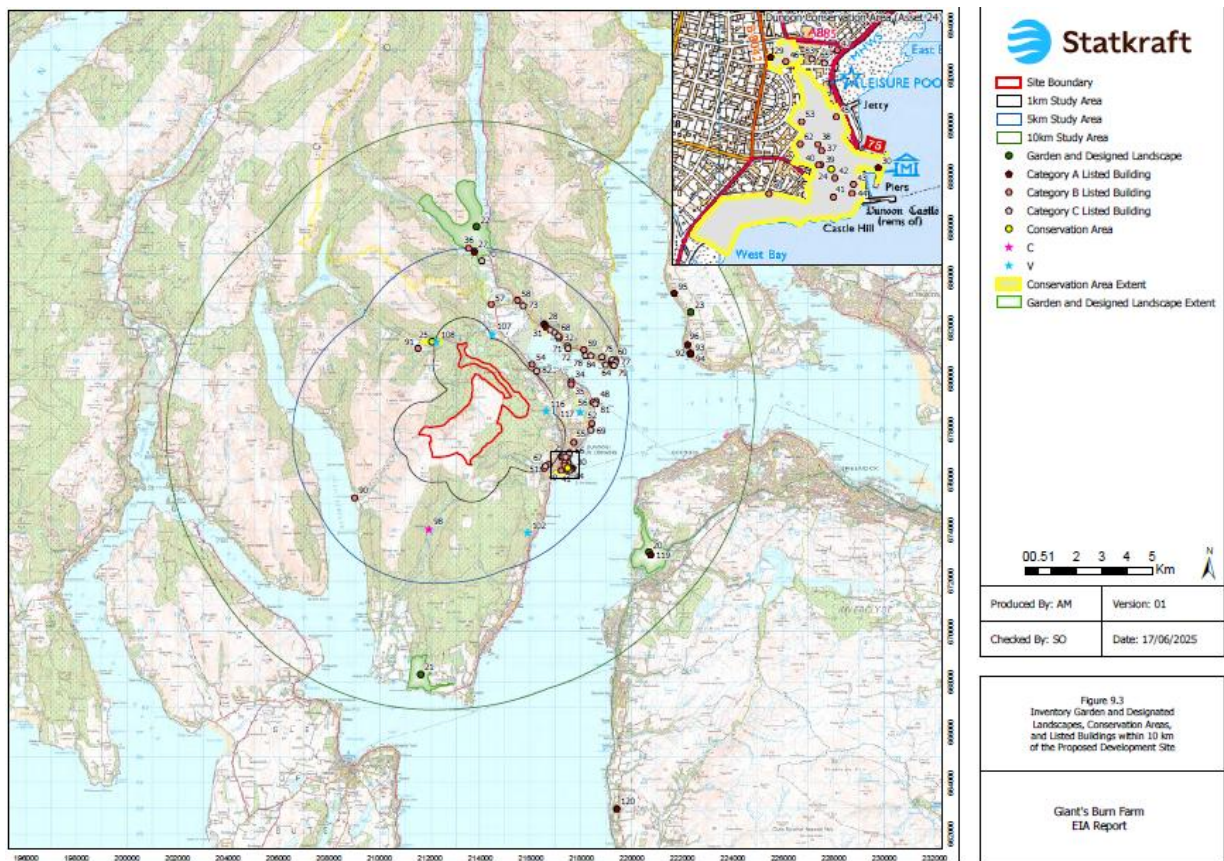


Figure 2 Heritage Designations

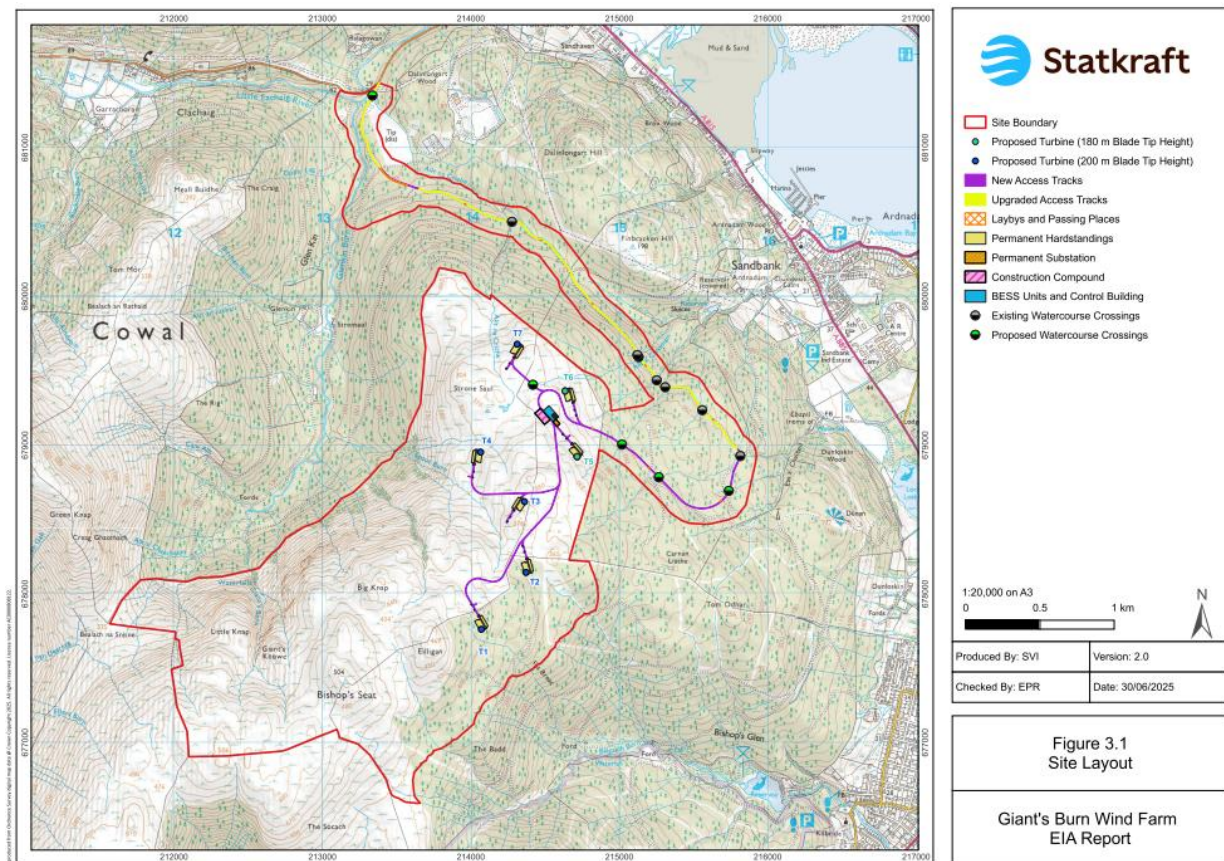


Figure 3 Proposed Site Layout

- 3.4. **Figure 2** (extract from the EIAR figure 3.1) highlights the proposed upgraded access track in yellow. The purple annotates the proposed new tracks to each of the seven proposed turbines.
- 3.5. Access to the site is via the B836 which is also National Cycle Route 75. The Core Path Dunans loop to Inverreck and the Loch Lomond and the Trossachs National Park boundary intersects the development site boundary and part of this core path will be used to access the development.

Planning History

- 3.6. The application site is within the Argyll and Bute Council area; therefore, the National Park Authority holds no formal records of relevant planning history of the site.
- 3.7. In their submission to the ECU, Nature Scot has provided a history of various iterations of wind farm applications which relate to the application site and to those in close proximity dating back to 2006. Those applications were consistently refused. The reasons for refusal are set out in the detailed planning history at Appendix 3 of this Report.
- 3.8. The EIA Scoping consultation for the site was undertaken by Scottish ministers between 29 February 2024 and 21 March 2024 in respect of up to 9 wind turbines with a tip height of 200 m for a 50-year period. A coordinated response was submitted by NatureScot with the National Park Authority. The subsequent application has reduced the number of turbines by 2 and reduced the maximum blade tip height of two of the turbines by 20m. Full details are set out in the EIA (Technical Appendix 4.1 Scoping Response Table 1).
- 3.9. In terms of neighbouring sites, an application for another windfarm at Inverchaolain (approximately 2km from the site boundary directly to the south) is at Scoping Stage ECU00006012, the Scoping Opinion was provided by the Scottish Government Energy Consents Unit on 17 April 2025. That proposal includes up to 13 wind turbines with a tip height of 200m and associated ancillary infrastructure including a battery energy storage system (BESS). The cumulative impact of windfarms (currently under consideration by the ECU) is considered in the Planning Assessment in Section 6 of this Report.

Description of Proposals

- 3.10. The site extends to 700.6 hectares, and the main components of the proposed development are set out in Chapter 3 of the EIAR and include the following:
- 7 Wind Turbine Generators (WTGs) 5 with a maximum tip height of up to 200m and up to two with a maximum tip height of up to 180m with an operation life span of 50 years. Each turbine will have a nominal capacity of 6.2 MW.
 - Hardstanding areas at the base of each turbine which includes areas of cut and fill at approximately 25m diameter, (WTG Hard standings), and a crane hard standing area and temporary blade laydown area, tower and nacelle storage (approximately 4313 m squared) at each wind turbine.

- Battery energy storage system (BESS) with a rated power of approximately 23 MW and energy storage of 53 MWh.
- Up to 6.4km of new on-site access track (5m width) and 3.8km of upgraded existing track (widened from 2.5m-to 5m) and associated drainage, three turning heads and nine passing places.
- A network of underground cabling to connect each wind WTG to the on-site substation.
- Ancillary development such as Substation accommodating a control building
- Temporary construction compounds and laydown areas.
- Temporary borrow pits.
- Any other ancillary works including clearance of 32.94ha of on-site forest with 21.68ha to be felled for peatland restoration and restocking of approximately 13.57ha.

3.11. The WTG towers would be of tapering tubular steel construction (**Figure 4**). Argyll and Bute Council and ECU would agree on the final colour, anticipated to be semi-matt white or non-reflective pale grey. The construction phase is anticipated to commence in 2028 and last 18 months. The proposed development would be connected to the electricity network via an on-site substation control building. The electricity generated by the proposed development would provide enough power for over 58,212 average Scottish households.

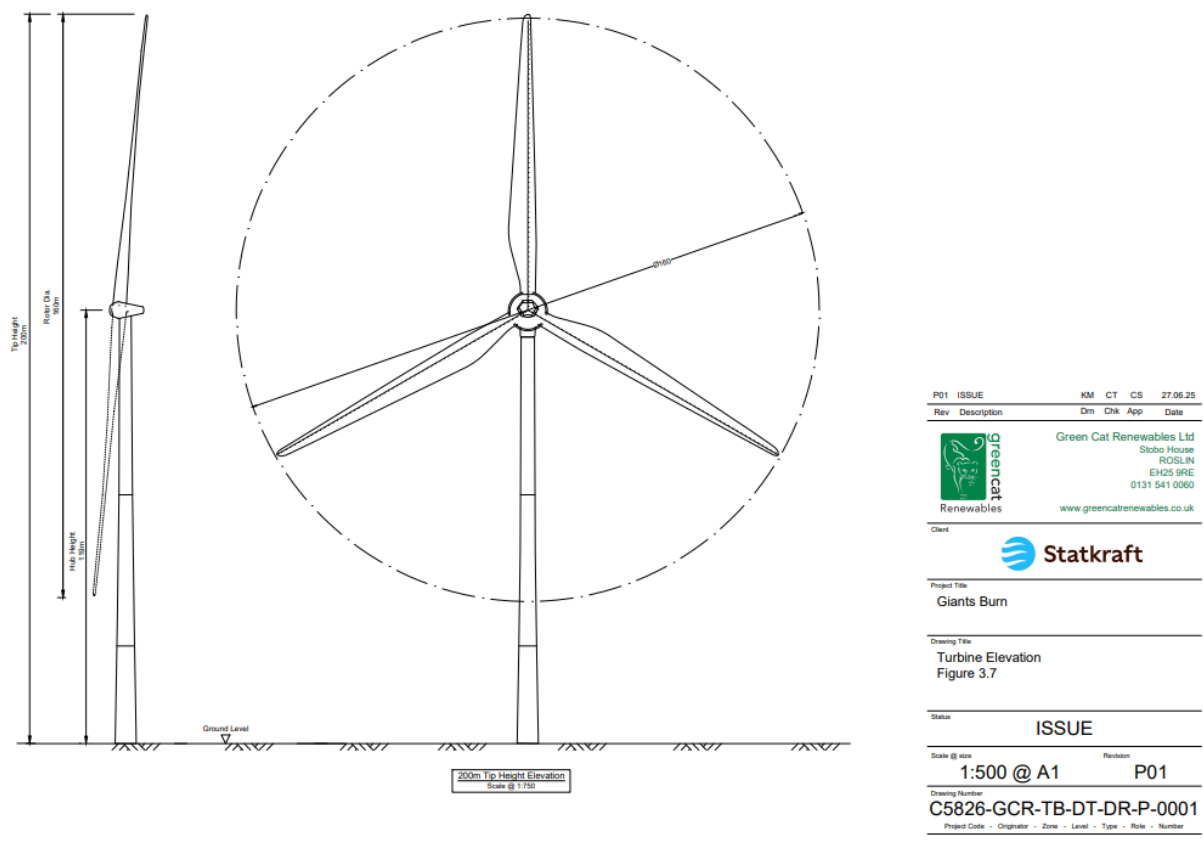


Figure 4 Turbine Elevation

- 3.12. The WTGs are typically fixed to steel reinforced concrete foundations approximately 25 m in diameter, 4m in depth subject to ground conditions. The location of the proposed WTGs and other infrastructure, including the on-site access track, may be subject to micro siting up to 100m in any direction as a result of additional constraints encountered during site works.
- 3.13. Three of the turbines would require visible aviation lighting. It is proposed that this would be ANO (2000 candela) visible red lighting, mounted in the hub of three of the turbines.

Community Benefits

- 3.14. The applicant estimates that during the development and construction phase the proposed development will contribute £39million in direct Gross Value Added (GVA) through its construction, supporting up to 482 direct and indirect Person Years of Employment. 58 of these jobs would be in Argyll and Bute and up to 174 in Scotland as a whole. The application proposes that the development will be able to support the development of both skills and businesses in the renewable energy business industry.
- 3.15. In line with Scottish government guidelines of £5,000 per MW of installed electricity generating capacity it is estimated that the proposed development could generate up to a total community benefit fund of £12.5million over the 50 years operational life. In line with Scottish Government best practice principles

shared ownership in the development is offered to local community interest groups. The developer also proposes £10,000 per annum to provide a Science, Technology, Engineering and Mathematics (STEM) fund for the local community during the operational period of the proposed development.

4. Summary of Relevant Supporting Information

- 4.1. The application is accompanied by an Environmental Impact Assessment Report (EIAR) prepared by the applicant and submitted to the Energy Consents Unit.
- 4.2. The EIAR includes a Landscape and Visual Impact Assessment (LVIA). An LVIA is a tool used to identify and assess the significance of and the effects of change resulting from development both on the landscape as an environmental resource in its own right and on people's views and visual amenity. This assessment used an initial study area of 45km. It identified more limited visibility beyond 20km, and changes of views were considered to reduce to negligible beyond 15km. A detailed study area of 15km has been used for the consideration of effects on visual receptors and landscape character. The assessment uses a 45km study area for the assessment of Special Landscape Qualities of the National Park. The assessment considers effects on residential amenity within 2km of the proposed development.
- 4.3. The LVIA sets out the potential landscape and visual impacts arising from the proposed windfarm and it also sets out an analysis of the visual impact of the proposed development in relation to the viewpoints and routes which were agreed upon at the EIA scoping stage. This presents an indication of the potential impact of the windfarm on visitor experience and residential amenity.
- 4.4. The LVIA includes figures showing the 'Zone of Theoretical Visibility (ZTV)'. LVIA figure 5.1 (see Appendix 1). ZTVs map areas from where the development would be theoretically visible. The LVIA and the ZTVs along with the applicant's assessment are considered in Section 6 of this Report which presents the National Park Authority's assessment on the impact of this proposal on the National Park.
- 4.5. The Environmental Impact Assessment Report and associated documents can be viewed online via the Energy Consents Unit portal by entering the planning reference ECU00005007 at <https://www.energyconsents.scot>.

5. Policy Context

Determining Authority: Role of Scottish Government's Energy Consents Unit

- 5.1. The proposed development will generate energy exceeding 50MW and therefore the application will be determined by the Energy Consents Unit (ECU) (on behalf of Scottish Ministers) in accordance with the National Planning Framework 4, the Argyll and Bute Local Development Plan and supporting documents.
- 5.2. The National Park Authority has been consulted as a neighbouring Planning Authority. 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 Authority's views on impacts into account. The National Park's response will be given due consideration along with those of the other statutory consultees.

Role of NatureScot

- 5.3. In accordance with the "agreement on roles in advisory casework" between NatureScot and the Scottish National Park Authorities, NatureScot are the lead body for providing landscape advice in relation to proposals outside the National Park. However, there may be issues on which both organisations will provide advice and the "agreement on roles in advisory casework" notes that there will be occasions when both organisations will provide advice. In these cases, both organisations will seek to ensure that their advice is complementary, is consistent with the National Park Partnership Plan and that any differences are clearly explained.
- 5.4. Landscape comments were provided to the National Park by NatureScot (who have provided their comments separately to the ECU) and our assessment of the predicted impacts on the National Park's Special Landscape Qualities are broadly consistent with NatureScot's assessment. The National Park Authority considered it should submit its own response to the ECU.

National Planning Policy

- 5.5. The adoption of NPF4 in early 2023 introduced a step change in the urgency to address the climate emergency and nature crisis. Policy 1 of NPF4 states that when considering all development proposals, significant weight will be given to the global climate and nature crisis.
- 5.6. NPF4 identifies "National Developments" as part of the National Spatial Strategy for Scotland. One of the 18 National Developments identified is "Strategic Renewable Electricity Generation and Transmission Infrastructure". This supports electricity generation and associated grid infrastructure throughout Scotland, providing employment and opportunities for community benefits, helping to reduce emissions and improve security of supply. The proposed development would therefore be considered as a National Development.
- 5.7. Given NPF4's focus on tackling the climate and nature crisis, there is strong policy support for renewable energy development. NPF4 Policy 11 (Energy) encourages and promotes all forms of renewable energy development onshore and offshore. NPF4 Policy 11 supports wind farms, however there is no support for proposals for wind farms in National Parks and National Scenic Areas. Development proposals that impact on national designations, such as National Parks and National Scenic Areas will be assessed in relation to Policy 4 (Natural Places).
- 5.8. Policy 4 (Natural Places) states that development proposals that will affect a National Park or National Scenic Area will only be supported where (i) the objectives of designation and the overall integrity of the area will not be

compromised, or (ii) 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.

- 5.9. Policy 11 (Energy) requires energy generation proposals to maximise net economic impact, including local and community socio-economic benefits such as employment, associated business and supply chain opportunities. Policy 11 also requires development proposals to address significant landscape and visual impacts, through design and mitigation, recognising that such impacts are to be expected for some forms of renewable energy. The Policy goes on to say that where impacts are localised and/or appropriate design mitigation has been applied, they will generally be considered acceptable.
- 5.10. NPF4 Policy 7 (Historic Assets and Places) part (i) states that development proposals affecting nationally important Gardens and Designed Landscapes will be supported where they protect, preserve or enhance their cultural significance, character and integrity and where proposals will not significantly impact on important views to, from and within the site, or its setting. Designated heritage assets within the National Park include Benmore Gardens and Kilmun Collegiate Church and various listed buildings. The National Park considers the effects on visual amenity within Benmore Gardens and Kilmun as significant and adverse. The windfarm would be a noticeable feature from Benmore Gardens and Kilmun including Kilmun Collegiate Church. The LVIA concludes that the turbines would not significantly disrupt appreciation of their historic character. Historic Environment Scotland are the statutory authority for advising on the heritage impact of the proposal.

National Parks (Scotland) Act 2000

- 5.11. 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.
- 5.12. The National Park Partnership Plan and Local Development Plan are material considerations where proposals outside of the National Park boundary affect the National Park Special Qualities.
- 5.13. 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.
- 5.14. The National Park Authority is distinguished from other planning authorities in that it is bound by the terms of the Act which requires that in the event of a conflict between its statutory aims, it must give greater weight to the first aim which is to conserve and enhance the natural and cultural heritage of the National Park. The ECU is not bound by this duty in the same way although the

ECU must have regard to the National Park Partnership Plan and the Local Development Plan within which the National Park Aims are embedded.

National Park Partnership Plan (2024-2029)

5.15. The National Park Partnership Plan (NPPP) is the overarching vision to guide how all those with a role in looking after the National Park will work together to ensure a successful, sustainable future. By 2045 the NPPP aims to deliver nine outcomes by focussing on 31 objectives from 2024-2029 which are listed under three themes: Restoring Nature, Creating a Low Carbon Place and Designing a Greener Way of Living.

Loch Lomond and Trossachs National Park Local Development Plan (2017-2021 LDP)

5.16. The Local Development Plan (LDP) sets out the vision for how the National Park should change over a 20-year period. The following LDP Policies are relevant to the consideration of this application:

- Overarching Policy 1 which requires all development to contribute to the National Park being a natural, resilient place by relating well to the landscape context and setting and respect the important physical, historical, landscape and cultural features of the site and surrounding area.
- Overarching Policy 2 which requires visual amenity and important views to be safeguarded and the rich landscape character of the National Park to be protected and features and areas specifically designated for their landscape values at any level to be protected and/or enhanced.
- Natural Environment Policy 1: National Park Landscapes, Seascape and Visual Impact require development to protect the special landscape qualities of the National Park.
- Historic Environment Policy 4: Gardens and Designed Landscapes requires that developments protect and/or enhance such places and do not impact adversely on their character, important views to, from or within them or their wider landscape setting.
- 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:
 - 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 principal gateways, and
 - 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
 - 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 out with the National Park where these criteria have not been met’.

5.17. The key policy criteria in the assessment for this proposal are Renewable Energy Policy 2 (a) and (c) in relation to visual impacts from renewable energy developments adjacent to the National Park.

Planning Guidance: Renewable Energy

5.18. 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.

5.19. This further emphasises the need for proposals out with the National Park to consider the visibility of the development from the National Park, and its impact on the setting of the National Park due to visual intrusion and its enjoyment by residents and visitors.

5.20. 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

6. National Park Authority’s Planning Assessment

6.1. As a consultee for this proposal, which lies out with the National Park, the National Park Authority’s focus for comments is the effects of the proposed development on the Special Landscape Qualities (referred to as “SLQs” throughout this section) and compliance with NPF4 Policy 4 ‘Natural Places’. However, it is recognised that the proposed wind farm may bring benefits to the National Park and more widely in terms of climate change, employment, the local economy and financial benefits for communities. The wider policy considerations of NPF4 are therefore also considered in the assessment below.

Landscape Considerations

6.2. The National Park is a landscape designation. As such it is recognised and valued for its special qualities that contribute to its scenic value. Special Qualities are defined (NatureScot 2008) ‘as the characteristics that, individually or combined, give rise to an area of outstanding scenery’. These are qualities that are perceived and experienced by people affecting the sense of place.

6.3. The 2010 ‘Special Landscape Qualities of the Loch Lomond and the Trossachs National Park’ report identified the qualities that make the National Park landscape and scenery special. These underpin the National Park landscape designation. The report identified general qualities that apply to the whole of the National Park and qualities specific to four sub areas.

6.4. The General SLQs which apply to the National Park are:

- A world-renowned landscape famed for its rural beauty;
- Wild and rugged highlands contrasting with pastoral lowlands;

- Water in its many forms;
- The rich variety of woodlands;
- Settlements nestled within a vast backdrop;
- Famous through routes;
- Tranquillity and
- The easily accessible landscape splendour.

6.5. The sub-area of Argyll Forest SLQ's are:

- A remote area of high hills and deep glens
- A land of forests and trees
- Arrochar's mountainous and distinctive peaks
- The variety of glens
- The slender jewel of Loch Eck
- The dramatic pass of Rest and Be Thankful
- The seaside architecture of Kilmun and Blairmore

National Park Assessment

6.6. Chapter 5 of the EIAR (Technical Appendix 5.1, Volume 3b) includes the detailed landscape assessment of the proposal which considers the effect of the proposed development on the SLQs, Landscape and Seascape Character, and Visual Amenity within the site and the surrounding area.

6.7. The LVIA (at paras 5.10.53- 5.10.58 along with Table 5.6 of the EIAR) assesses the effects on the SLQs and the National Park. Paragraph 5.10.58 of the LVIA concludes that there will be no significant adverse effects on the SLQs of the National Park. It states

"Considering the above effects (referencing table 5.6) on the SLQs together, non-negligible effects would arise along the south-west boundary of the [National Park] from Strone to Kilmun and the accessible hillsides above these villages and extend through the glen at the southern boundary closest to the site and along Loch Eck as far as Dornoch Point. Considered together, these would give rise to impacts of small magnitude on qualities between High and High/medium sensitivity and effects would be moderate, adverse and not significant."

The National Park disagrees with this conclusion and considers the following SLQs are likely to experience **adverse effects** resulting from the introduction of the proposed development, some **significant and adverse** discussed in detail below.

General Special Landscape Qualities

- SLQ 1: "A world-renowned landscape famed for its rural beauty"
- SLQ 5: "Settlements nestled within a vast natural backdrop"
- SLQ 7: "Tranquillity"
- SLQ 8: "The easily accessible landscape splendour"

Sub area of Argyll Forest Special Landscape Qualities

- SLQ 9: "A remote area of high hills and deep glens"
- SLQ 12: "The variety of glens"

- SLQ 13: “The slender jewel of Loch Eck”
 - SLQ 15: “The seaside architecture of Kilmun and Blairmore”
- 6.8. The National Park consider that the LVIA has underplayed the magnitude of effect, and in some instances the susceptibility of the SLQs and therefore sensitivity. We consider the following SLQs are likely to experience adverse effects resulting from the introduction of the proposed development, some significant and adverse.
- 6.9. The Argyll Forest SLQ area of the National Park extends from the Holy Loch in the south to the rugged Arrochar Alps to the north. The landscape of mountains, glens, lochs and rivers is defined by the western end of the Highland Boundary Fault which marks a line between lowland and Highland Scotland.
- 6.10. The coast, hinterland, hills and mountains of the Argyll Forest area of the National Park within Cowal are valued as popular visitor destinations nationally and internationally and are within easy access of Central Scotland. Key areas which form an important part of the identity of this area in proximity to the proposed development include the Holy Loch regarded as the: *“marine gateway to Loch Lomond & the Trossachs National Park”*, Kilmun and Strone, long narrow Loch Eck, Benmore, coastal slopes and summits.
- 6.11. The LVIA ZTV ‘EIAR figure 5.1’ (Appendix 1 of this Report) identifies the theoretical visibility of the proposed windfarm development within the National Park across areas of the Argyll Forest including the southern coast at the Holy Loch, Strone and Kilmun, from lower elevations within Kilmun Arboretum, Benmore Botanic Gardens, the River Eachiag valley, across the majority of Loch Eck and from elevated valley sides and summits including Strone Hill, Bienn Mhor and Ben Bhula.
- 6.12. The ZTV at Appendix 1 is a ‘bare-ground’ ZTV which is based on landform and does not account for the screening effect of buildings or forestry (thereby representing worst-case/ maximum visibility). However, for other ZTVs within the LVIA (applicant’s figures 5.2, 5.5, 5.6 and 5.8) buildings have been assigned an assumed height of 7m and forest 15m (based on OS data). These give an impression of reduced visibility. This is not declared on the ZTV figures. Forestry is widespread in the area and felling coups a common feature. The consented Overhead Line from Dunoon to Loch Long and Larch removal will increase the extent of visibility of the development. Widely available recent aerial photography indicates some of the areas shown as woodland on the OS Open Map Local have already been felled in proximity to the proposal, rendering much of the visibility mapping supporting the LVIA out of date. Therefore, LVIA ZTV figures including 5.2, 5.5, 5.6 and 5.8 do not represent a worst-case scenario and do not accord with GVIA best practice guidelines.
- 6.13. **SLQ 1: “A world-renowned landscape famed for its rural beauty” and SLQ 8: “The easily accessible landscape splendour”**. Due to some of the similarities in narrative on scenic qualities of the National Park these two SLQs are grouped and considered together.
- 6.14. Large numbers of people visit the Argyll Forest area of the National Park within Cowal either by ferry from Gourock or by road along the A815. The introduction

of the proposed development in proximity to the southern boundary of the Argyll Forest, would notably detract from the: “rural beauty” and the “landscape splendour” experienced from the settled coastal edge of the Holy Loch, across much of Loch Eck and from surrounding hills and mountains. Where visible, visitors to the Argyll Forest would experience views of the proposed development when looking southward from key areas of the southeastern part of the National Park.

- 6.15. The applicant notes for SLQ 1 that: *“the reputation of the National Park is not likely to be affected by a nearby wind farm, given that this would require the wind farm itself to become a feature of equal renown to [the National Park]”*. The National Park considers that the proposed development would introduce a dominate focal point in southward looking views from the Argyll Forest and could become such a feature when experienced from key areas as shown by Viewpoint 4: Strone Pier (**Figure 5** at Appendix 2), Viewpoint 8: Dornoch Point (**Figure 8** at Appendix 2), Viewpoint 23: Strone Hill (**Figure 11** at Appendix 2), Illustrative View J – Kilmun, Graham’s Point (**Figure 13** at Appendix 2) and Illustrative View K – Kilmun, Arboretum (**Figure 14** at Appendix 2).
- 6.16. The proposed development would **significantly and adversely affect** the current appreciation of views from both lower and higher elevations within a minimum distance of 12 km of the proposed turbines, including the majority of views south from the coastal edge of the Holy Loch, Kilmun Strone, Kilmun Arboretum, open waters of Loch Eck, associated loch sides, Benmore Gardens, and key summits including but not limited to Strone Hill and Bienn Mhor. Effects are considered to be **significant and adverse** on the appreciation of these SLQs as the Argyll Forest area of the National Park is easily accessible from the Central Belt (in terms of transport links and proximity). Significant day time effects would extend into some **significant night-time effects** where the turbine lighting would be seen above the Cowal Hills and the existing low-level lighting associated with settlements and along transport routes.
- 6.17. **SLQ 5. “Settlements nestled within a vast natural backdrop” and SLQ 15: “The seaside architecture of Kilmun and Blairmore”** These SLQs are considered together as they relate to the settlements within the Argyll Forest that would be adversely affected by the proposed development.
- 6.18. While the moorland hills of the site including Bishops Seat, Big Knap and Strone Saul are outside the National Park boundary they do provide part of the wider setting, contain the southern side of the Holy Loch and contribute to the: *“background”* and *“...strong sense of surrounding all-enveloping nature”*.
- 6.19. The containment provided by the hills within the site is well represented from settled loch side areas as shown by Viewpoints 4: Strone Pier (**Figure 5** at Appendix 2), Viewpoint 5: A815 ‘Orchard’ (**Figure 6** at Appendix 2) and Illustrative View J – Kilmun, Graham’s Point (**Figure 13** at Appendix 2). From these and similar locations on the northern and western sides of the Holy Loch at Strone and Kilmun (recognised for its: distinctive ‘seaside resort’ architectural quality) the proposal would introduce a new dominant large scale focal point visible on the skyline formed in part by the hills within the site behind Dunoon. The proposed turbines would notably breach the skyline formed by the: *“background”* hills. The vertical height of these man-made elements would conflict with the: *“small-scale”* of these settled areas, *“a strong sense of*

surrounding all- enveloping nature” and *“the good coastal views...”* experienced from Kilmun.

- 6.20. From the majority of Kilmun and Strone the proposed turbines would be seen across the Holy Loch, the introduction of the proposed turbines would breach the containment formed by the hills behind Dunoon and conflict with the perceived small-scale of these settled areas. These effects are considered **significant and adverse** on the appreciation of SLQ 5. It is considered that significant adverse daytime effects on the *“background”* hills and *“a strong sense of surrounding all- enveloping nature”* would progress into **significant adverse night-time effects**, where views from the eastern side of the Holy Loch would be similar to those represented by Viewpoint 5: A815 Orchard, where the lit turbines would be seen above the underlying hills. The proposed development would **significant and adversely** affect the coastal views element of SLQ 15 experienced from Kilmun, whilst views from Blairmore would remain largely unaffected, the appreciation of the distinctive architecture of Kilmun would be **significantly and adversely** effected. It is worth noting on this conclusion that NatureScot considers the impact on SLQ 15 will be **adverse but not significant**.
- 6.21. **SLQ 7: “Tranquillity”** and **SLQ 13: “The slender jewel of Loch Eck”** These SLQs are considered together as they relate to tranquillity, particularly how this experiential quality is expressed at Loch Eck.
- 6.22. While the coastal edge is associated with greater human influences and activity, including main roads, recreational visitors and water-based activities on the open waters of the Holy Loch, the adjacent hinterland can accommodate “uncrowded places”. Tranquillity can be experienced near the coastal edge looking across the Holy Loch from higher elevations within Strone, Kilmun, Kilmun Arboretum (Illustrative View K – Kilmun, Arboretum) and from Strone Hill (Viewpoint 23). Away from the coastal edge this SLQ is strongly expressed across the Argyll Forest and actively sought in areas that include, but are not limited to, Benmore Gardens, Loch Eck (Viewpoint 8: Dornoch Point), and from higher summits such as Beinn Mhor (Viewpoint 24: Beinn Mhor - **Figure 12** at Appendix 2)).
- 6.23. From such locations the proposal would introduce a large-scale wind farm highly visible against the skyline in views looking southward. The proposed development would introduce visibility of wind farm development to some lower elevations, including the majority of Loch Eck where: *“The loch feels very tranquil, quiet and remote, even empty and wild”*. In southward looking views from the open waters of Loch Eck and promontories such as Dornoch Point (Viewpoint 8: Dornoch Point) and popular Rubhar Croise (also known as Jubilee Point) the hills within the site form in part the enclosing skyline at the southern end of the loch. The introduction of the proposed development on this skyline would introduce a dominant contemporary feature where the movement of turbine blades would notably conflict with the current experience of remote tranquillity across Loch Eck and associated loch sides. It should be noted that potential visibility of the proposed development from the eastern side of Loch Eck is likely to be increased by the indication of some tree felling required along the A815 during construction of the windfarm.

- 6.24. From other coastal and higher elevations, the proposed development would bring large scale turbines into closer proximity than any other visible operational wind farm - with the resultant movement of blades distracting and detracting from the stillness and tranquillity currently experienced from these locations.
- 6.25. The proposal would erode the current sense of tranquillity experienced across a large geographical extent of the Argyll Forest, up to a minimum of 15 km from the proposed development. The turbines would introduce prominent large-scale structures into coastal areas, intimate low-lying areas and open uplands. These effects are considered to be significant and adverse on the appreciation of these SLQs.
- 6.26. The National Park considers that significant daytime effects on SLQ 7 and 13 would extend into **significant adverse night-time effects**. Where the sense of tranquillity experienced from coastal locations the aviation lights would be seen incongruous above lighting associated with small-scale settlement below. We consider that similar night-time views to those shown by Viewpoint 5: A815, 'Orchard' would be experienced from much of the coastal hinterland and open waters of the Holy Loch. From areas that experience strong dark sky characteristics, such as from Loch Eck, the aviation lights would introduce a new contemporary night-time focal point above the head of the loch where southward looking views would be channelled down across the loch and up toward the proposed turbines and lights.
- 6.27. **SLQ 9: "A remote area of high hills and deep glens"** and **SLQ 12: "The variety of glens"**. These SLQs are considered together given some of the similarities in description of glens and sense of remoteness within the Argyll Forest.
- 6.28. It is stated in the description for SLQ 9 that: *"The high mountains and long sea lochs restrict access by road into the area, so that travel by sea has always been the easiest, preferred means of travel. This continues today with the ferries across the Firth of Clyde providing access into Holy Loch, Loch Goil and the lower reaches of Loch Long"*. Although it should be noted that this description provides narrative for the Firth of Clyde outside the National Park, the site forms part of the wider skyline experienced when journeying by ferry from the more heavily settled southern side of the Clyde. A sense of journey to the remote is experienced crossing the Firth of Clyde toward the coastal gateway of the National Park, an experience that would be adversely affected by the introduction of the proposed development onto the undeveloped skyline in northward looking views as shown by Illustrative View L – Gourrock-Sandbank Ferry (**Figure 15** Appendix 2).
- 6.29. Within the Argyll Forest the lack of notable built development beyond key transport routes and occasional settlement helps contribute to the wider sense of the remote. From areas of Strach Eachaig (Viewpoint 5: A815, Orchard) as **Figure 6** Appendix 2, the majority of Loch Eck (Viewpoint 8: Dornoch Point) **Figure 8** Appendix 2, the steep north sides and summits associated with Glen Massan (Viewpoint 24: Beinn Mhor) **Figure 12** Appendix 2, the introduction of the proposed development would introduce a new contemporary man-made focal point either seen partly or fully on the skyline detracting from SLQ 12 'variety of glens' which are, *"generally quiet and peaceful, with built development and habitation sparse..."*.

6.30. These effects are considered to be significant and adverse on the sense of remoteness defined by SLQ 9 and would extend into significant night-time effects particularly from elevated positions where people may visit to experience sunrise / sunsets and night skies. While we consider effects on SLQ 12 to be adverse we do not consider them to be significant given the theoretical visibility on Glen Massan and other glens remaining largely unaffected.

Landscape and Seascape Effects

- 6.31. The site lies within the Argyll and Bute Landscape Character Type (LCT) 1 'Steep Ridgeland and Mountains'. The LVIA notes significant effects on LCT1, adjacent LCT4 'Mountain Glens' (covering settled areas on both north and south banks of the Holy Loch, including Kilmun and Strone and stretches north covering Strath Eachaig, including lower Benmore Gardens and the southern end of Loch Eck). Mountain Glen LCT 4 is illustrated in Viewpoint 5 Orchard (**Figure 6** Appendix 2) and Viewpoint 6 Benmore Gardens entrance (**Figure 7** Appendix 2). Significant effects are also noted on adjacent Seascape Character Area (SCA) 3 'Inner Firth of Clyde', along the Clyde from Holy Loch and Dunoon.
- 6.32. Significant landscape and seascape effects are assessed by the applicant to extend to approximately 5 km south of Glen Lean, up to 4 km northeast across the Holy Loch and up to 6 to 7 km within the Firth of Clyde.
- 6.33. The LVIA reports significant effects on landscape character would arise as a result of the physical presence of the turbines and close views of the turbines such that they would be a key feature of the landscape within the upland area south of Glen Lean, visible up to 4km across the Holy Loch to the northeast (within the National Park), and within the firth up to 6-7km from the turbines.' While the National Park broadly agrees with some of the effects identified, it is considered the applicant underestimates the geographical extent of potential landscape and seascape significant effects.

Visual Effects

- 6.34. The LVIA reports **significant effects** on visual receptors would arise as a result of close views of the turbines in areas up to 5km from the turbines across Holy Loch to the northeast and within the firth up to 7-8km from the turbines. The EIAR visual assessment has been undertaken from 24 viewpoints. Visualisations are provided from eight viewpoints within the National Park. These are set out in Volume 3b of the EIAR. Additional illustrative viewpoints are provided (cultural viewpoints J and K and Viewpoints 05 and 16 at Appendix 2). Wireframes are also provided from Beinn Narnian, Ben Bheula and Conic Hill.
- 6.35. Within the National Park, significant visual effects are reported on users of local roads and core paths between Sandbank and Loch Eck, receptors within the settlements of Kilmun and Strone. Significant visual effects are identified to extend between approximately 7 to 8 km from the proposed development.
- 6.36. No visual assessment has been provided along the A880 which runs along the northern side of the Holy Loch connecting Kilmun, Strone and travelling north to

Blairmore and Ardentinnny. The ZTV Fig 5.1 (Appendix 1 of this report) indicates visibility of all 7 turbines from this route and at a distance of 4km away from the windfarm the turbines will be open, close-range views.

6.37. The LVIA assessment concludes **significant and adverse** visual effects from:

- Kilmun, this includes Kilmun Arboretum. The effects are illustrated Viewpoint 5 A815 'Orchard' (**Figure 6** at Appendix 2 of this report) and illustrative view J (**Figure 13** at Appendix 2). The National Park agrees with this assessment.
- Strone. The effects are illustrated Viewpoint 4 Strone Pier (**Figure 5** at Appendix 2) and illustrative view J (**Figure 13** at Appendix 2). The National Park agrees with this assessment.
- Local roads and core paths between Sandbank and Loch Eck. The effects are illustrated in Viewpoint 6 (**Figure 7** at Appendix 2). The National Park agrees with this assessment.

6.38. The National Park considers that given the high sensitivity of visual receptors and accounting for the vertical height and horizontal extent of the proposed development that the scale of visual change would be higher and in turn that significant adverse visual effects would be experienced by the visual receptor groups illustrated by the below viewpoints:

- Viewpoint 8: Dornoch Point / A815 receptor group (Figure 7)
- Viewpoint 23: Strone Hill (**Figure 11**)
- Viewpoint 24: Beinn Mhor (**Figure 12**)
- Viewpoint 6: Benmore Gardens Entrance (**Figure 7**) and
- Viewpoint 22: Benmore Gardens Hilltop (**Figure 10**)

6.39. In terms of the visual effects experienced from Benmore Gardens, the LVIA recognises that the Wind Farm development '*would be more openly seen walking back down the steps and from some of the paths below the viewpoint in the upper parts of the garden.*' Also noted by the LVIA the 2025 storm caused '*notable damage to the gardens which may mean there are more open views from higher areas of the garden in the medium to long term*'

6.40. The National Park considers that given these recent storm events have resulted in loss of vegetation (but also seasonal changes in the autumn / winter and possible future disease control) there would be opportunity to experience views of the proposed development beyond those represented by Viewpoint 6: Benmore Gardens (Entrance) (**Figure 7** Appendix 2) and Viewpoint 22 - Benmore Gardens (Hilltop Viewpoint) (**Figure 10** Appendix 2). It is considered that there would be significant visual effects experienced from within Benmore Botanic Gardens particularly near Benmore House (cultural viewpoint 16 – wireline drawing) (**Figure 16** at Appendix 2) and from higher elevations including the ascent / descent to the Wright Smith Memorial Viewpoint and Shelter. We therefore disagree with the applicant that no significant visual effects would be experienced by visitors to the Benmore Botanic Gardens.

Night-time effects

- 6.41. The LVIA assessed that there would be no significant nighttime effects on the SLQs, landscape character and visual amenity. The LVIA (Technical Appendix 5.1: Methodology) states that: *“The key characteristics of landscapes which distinguish the landscape character areas described in character assessments are generally obscured after dark. Potential changes to landscape character at night would arise from changed skylines and to perceptions of darkness and an absence of development. Changes to this small subset of characteristics would not be likely to give rise to notable effects on landscape character and are not considered in detail within the assessment”*.
- 6.42. NatureScot ‘Guidance on Aviation Lighting Impact Assessment’ considers that aviation lighting affects both landscape and visual receptors. The National Park considers it a notable omission that effects of visible aviation lighting on landscape and seascape character are not considered in the assessment.
- 6.43. The LVIA (at paras 5.10.56 -5.1.57 and table 5.6) considers the qualities of tranquillity and sense of remoteness are more susceptible to lighting effects from the windfarm. The LVIA does not consider the settled coastal areas to exhibit these qualities, and for areas that do (such as the summits within the National Park) the LVIA considers that people are less likely to be present at night. The LVIA does consider the areas around the head of the Holy Loch and along Loch Eck display these qualities but does not consider the nighttime effects to be significant.
- 6.44. The National Park considers that significant nighttime effects will be experienced in the following SLQs:
- General SLQs:
- SLQ 1: “A world-renowned landscape famed for its rural beauty”
 - SLQ 5: “Settlements nestled within a vast natural backdrop”
 - SLQ 7: “Tranquillity”
 - SLQ 8: “The easily accessible landscape splendour”
- Sub Area of the Argyll Forest SLQs:
- SLQ 9: “A remote area of high hills and deep glens”
 - SLQ 13: “The slender jewel of Loch Eck”

Cumulative Impact

- 6.45. The LVIA reports that there would be no significant cumulative effects. No sequential cumulative assessment on visual amenity has been carried out. This is considered a notable omission given the large number of popular scenic recreational routes within the study area including popular routes within the National Park.
- 6.46. Given the proximity and location of the proposed Inverchaolin windfarm (currently at scoping stage) to the immediate south, and the likely progression of that development to application stage, the National Park Authority considers there to be potential for the combined developments to read as one large wind farm. This would increase visibility of windfarm development in the Argyll Forest area of the National Park and is likely to result in some **significant cumulative effects** on the SLQs.

Summary

- 6.47. The National Park's Landscape Assessment concludes that the nature and scale of the proposed development at this location is such that it cannot be accommodated without significant adverse landscape and visual effects. This includes significant adverse day time effects and night-time effects on the Argyll Forest area of the National Park. It is assessed that given the proposed siting, scale and type of development, it would not be feasible to overcome the significant adverse effects identified within the site parameters. The National Park does not consider that there is any option for mitigation of the development's impact.
- 6.48. The introduction of turbines of this scale and in this proximity and location to the National Park boundary, would significant and adversely effect the experience, enjoyment and perception of several SLQs. These SLQs are recognised and valued and are integral to defining the National Park character, scenic value and sense of place. This would undermine the integrity of the National Park designation.
- 6.49. The National Park's assessment is aligned with NatureScot's assessment of the proposal with the exception of the conclusion of the significance of adverse effects in relation to Special Landscape Quality 15' 'The seaside architecture of Kilmun and Blairmore'.

Planning Policy Considerations

- 6.50. Unlike planning applications considered under the terms of Section 25 of the Planning Act, the Development Plan does not form the primary basis upon which the application will be determined. Nevertheless, the Development Plan will still be an important material consideration.
- 6.51. As already noted, National Planning Framework 4 introduces a significant adjustment in national policy on climate and energy and recognises the crucial role that renewable energy developments play in a climate crisis. Nevertheless, NPF4 has maintained a moratorium against wind farms within National Parks and National Scenic Areas (Policy 11) and there remains a requirement to consider potential landscape and visual impacts, alongside the benefits resulting from renewable energy generation (Policy 4).
- 6.52. The National Park Partnership Plan and Local Development Plan are supportive of renewable energy and the urgent need to tackle the climate and nature crisis and the role that renewable energy development must play in this. However, the National Park Aims and the policies which follow from them, within both of these plans, require that a balance be maintained having regard to the natural and cultural heritage of the area; that this is conserved and enhanced and that people are encouraged to enjoy the Special Landscape Qualities of the National Park.
- 6.53. Local Development Plan Renewable Energy Policy 2 is specific to renewable energy developments adjacent to the National Park. This policy states that the National Park will object to developments which would have significant adverse visual impact on the landscape setting of the National Park and its principal gateways.

- 6.54. National Planning Framework 4 - Policy 4 (Natural Places) part c) states that development proposals that will affect a National Park or National Scenic Area will only be supported where (i) the objectives of designation and the overall integrity of the area will not be compromised, or (ii) any significant adverse effects on the qualities for which the area has been designated are clearly outweighed by social, environmental or economic benefits of national importance.
- 6.55. In terms of part (ii) benefits, chapter 14 of the EIAR sets out the assessment of the proposed benefits on climate change and the potential contribution of the development to the Scottish Government's net zero greenhouse gas emission target by 2045. Table 14.8 sets out the Calculated Carbon Emission Savings. Paragraph 14.3.29 sets out the carbon payback time of the development as 1.2 years based on the fossil fuel mix and 2.4 years based on a grid-mix of electricity generation.
- 6.56. The potential socio-economic benefit of the proposal is set out in the applicant's Socio Economic Benefits Report (June 2025). The socio-economic and community benefits are described at paras 3.14 and 3.15 of this Report. It is important to note that whilst the economic benefits in terms of GVA and jobs can be taken into account, the voluntary monetary contributions and community benefits are not material planning considerations.
- 6.57. Although the proposed wind farm would be a National Development (as defined by NPF4) and acknowledging the role that renewable energy development must play in a climate crisis, it is assessed that the significant adverse effects on the National Park of this proposal are not clearly outweighed by social, environmental or economic benefits of national importance. The significance of the impacts on the National Park is key in terms of this policy. The National Park is designated as it is a landscape of outstanding national importance for its natural and cultural heritage and is highly valued by local residents and visitors from all around the world.
- 6.58. The southwestern part of the National Park, including the Holy Loch to Loch Eck and Kilmun and Strone are areas where people first enter the National Park and are principal gateways to the National Park and key routes in close proximity to the proposed development include the A815.
- 6.59. The proposed windfarm would be the closest sited windfarm to the National Park boundary in this location and would bring the proximity of windfarm development much closer than any other to date (as reported to the ECU on the currently pending Glentarken and Glen Lednock windfarms). The introduction of large turbines up to 200m in height into an area so close to the National Park boundary, and where there are currently no windfarms currently visible in the backdrop, would significantly detract from and compromise several Special Landscape Qualities and key characteristics that are integral to defining the enjoyment of south and western areas of the National Park and popular hills. In this case, as set out in the landscape assessment section of this report, the objectives of designation and the overall integrity of the National Park would be compromised by the proposed development.
- 6.60. This proposal would also set a landscape precedent for further windfarms in this area including the adjacent Inverchaolin windfarm proposal which, if

consented, would cumulatively exacerbate the identified adverse landscape impacts and further undermine the integrity of the National Park designation. Whilst the benefits of the development are acknowledged, they are not deemed of national importance and there is insufficient justification as to why the proposal, and the benefits, could not accrue from siting in a less sensitive location away from the National Park boundary. Given the significant impact upon the Special Landscape Qualities, it is concluded that proposed development would be contrary to Renewable Energy Policy 2 of the Local Development Plan and NPF4 Policy 4 part (c).

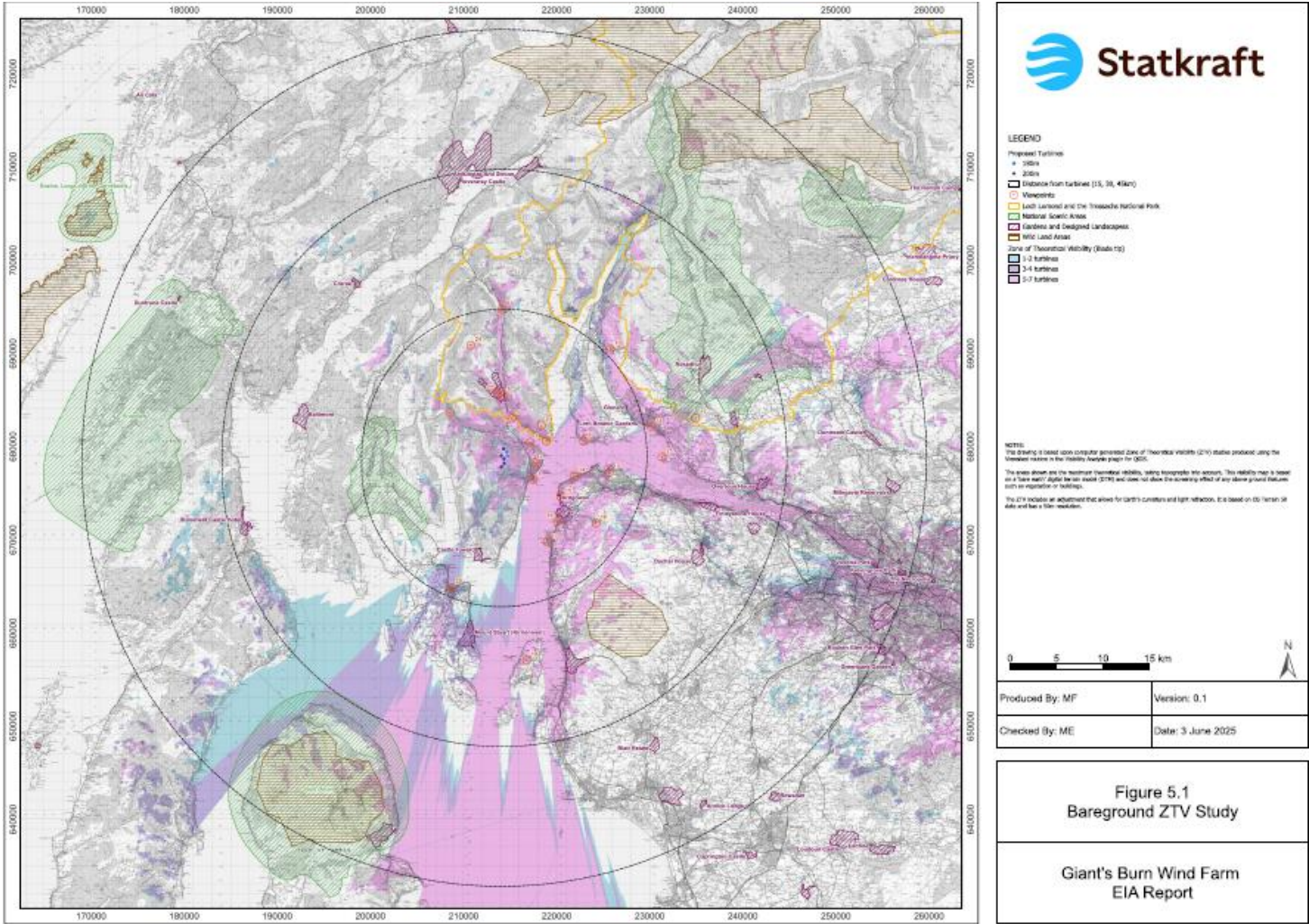
- 6.61. NPF4 Policy 11 supports the principle of development proposals for all forms of renewable, low-carbon and zero emissions technologies. It recognises that landscape and visual impacts are to be expected for some forms of renewable energy and states that where impacts are localised and/or appropriate design mitigation has been applied, they will generally be considered acceptable. However, in this case, the impacts would be widespread across a significant part of the south and west of the National Park and its Special Landscape Qualities and would therefore not be localised. It is therefore considered that the proposed development would not comply with NPF4 Policy 11. It is therefore considered that the proposed development would not comply with NPF4 Policy 11.
- 6.62. NPF 4 Policy 11- part c states that development proposals will only be supported where they maximise net economic impact, including local and community socio-economic benefits as employment business and supply chain opportunities.
- 6.63. NPF 4 Policy 11 - part e states that in addition, project design and mitigation will demonstrate how a number of impacts are addressed such as impacts on communities, significant landscape and visual impact, public access etc. The National Park Natural Heritage Advisor and NatureScot agree that there is no level of mitigation which could address the significant adverse impact that would result from the proposal.
- 6.64. NPF4 Policy 12 'Zero Waste' supports developments which seek to reduce, reuse or recycle materials. The application proposes the decommissioning of the development after 50 years and this will be regulated by Argyll and Bute Council.

Conclusion

- 6.65. The proposed Giant's Burn windfarm would be of significant scale and proximity to the southwest boundary of the National Park. The proposed development would have a significant adverse effect on several of the Special Landscape Qualities within the Argyll area which are integral to the National Park designation. The proposed location, so close and prominent to the National Park boundary will compromise the integrity of the National Park designation.
- 6.66. It would have a significant adverse impact upon the open views and visual amenity for residents, visitors and recreational users of the National Park including the experience of the Upper and Inner Clyde seascape - the marine gateway to the National Park.

- 6.67. Given significant adverse effects on the National Park and its special qualities it is considered that the proposed development does not comply with NPF4 Policy 4 'Natural Places' c) which is clear that development will only be supported where the objectives of the designation and the overall integrity of the National Park will not be compromised. It also does not comply with NPF4 Policy 11 (Energy) e) ii. due to the extensive (more than localised) nature of the effects on the distinctive landscapes and seascapes of the Upper and Inner Clyde area that cannot be mitigated.
- 6.68. The significant adverse effects that the proposal will have upon the Special Landscape Qualities for which the National Park has been designated are not outweighed by social, environmental or economic benefits of national importance. It is therefore recommended that the National Park Authority object to the proposal. for the reasons set out in Section 2 of this report.

Appendix 1 – Zone of Theoretical Visibility



Appendix 2 – Viewpoint Photomontages



Viewpoint 04: Strone Pier

Figure 5 Viewpoint 4: Strone Pier



Figure 6 View Point 5: Orchard

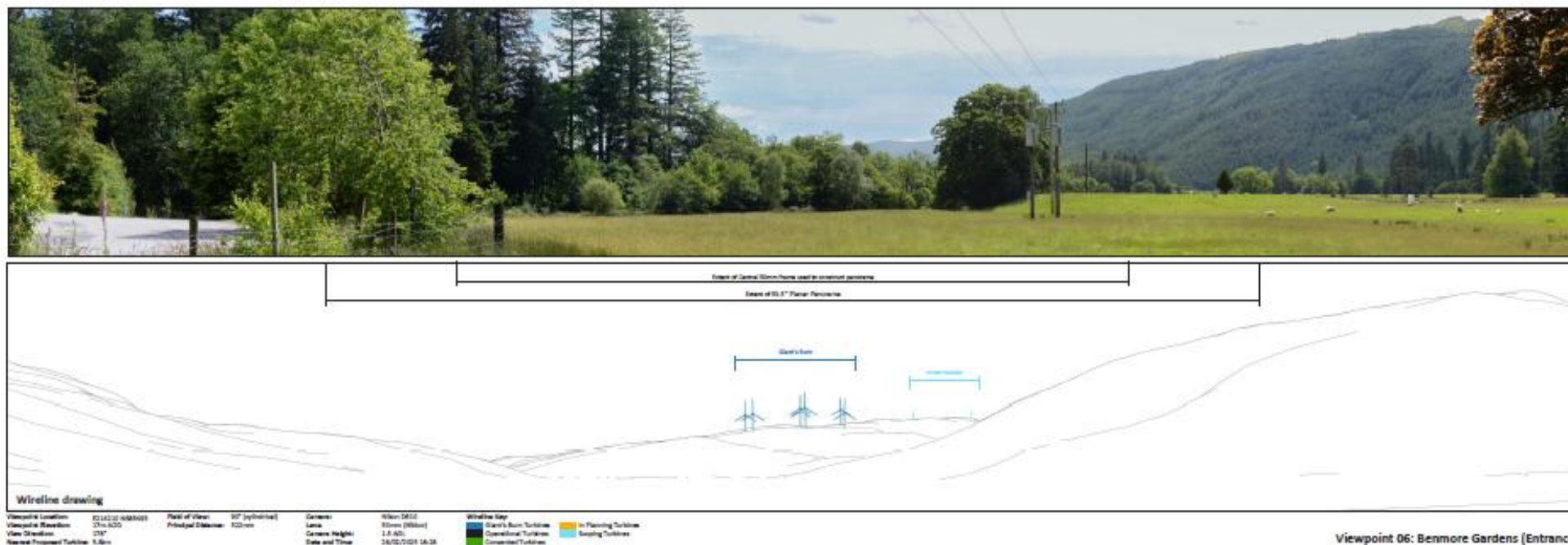


Figure 7 View Point 6: Ben More Garden – Entrance



Viewpoint 08: Dornoch Point

Figure 8 View Point 8: Dornoch Point

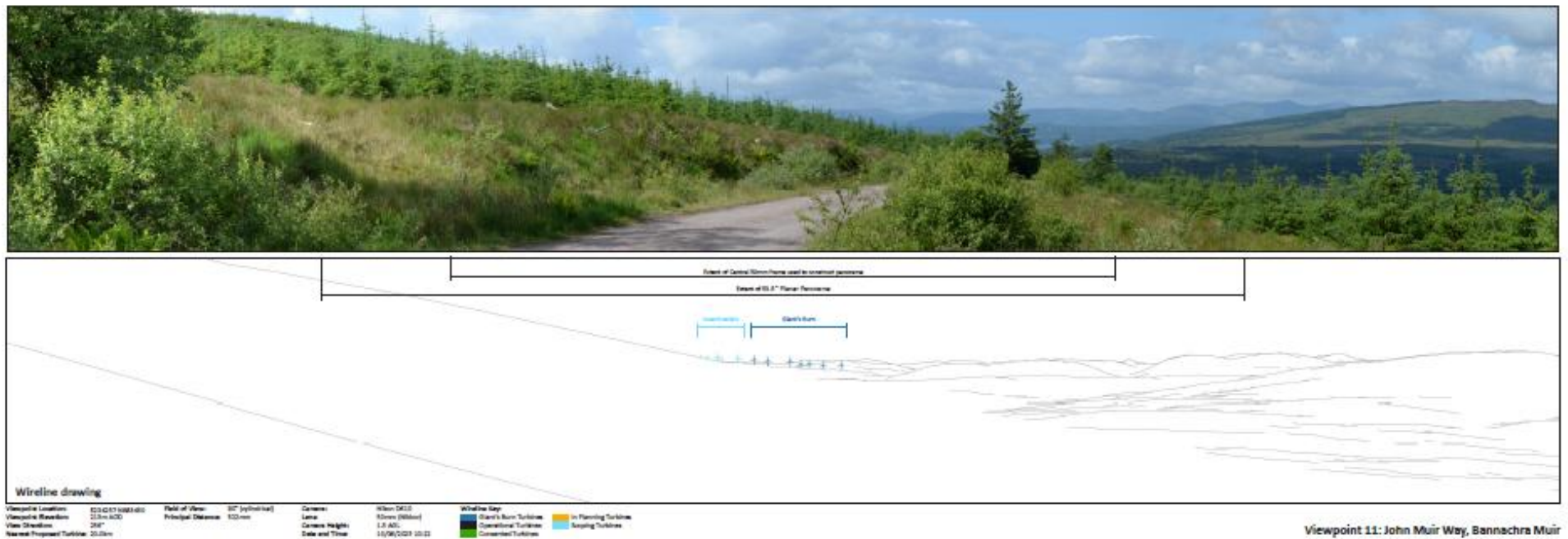


Figure 9 View Point 11: John Muir Way, Bannachra Muir

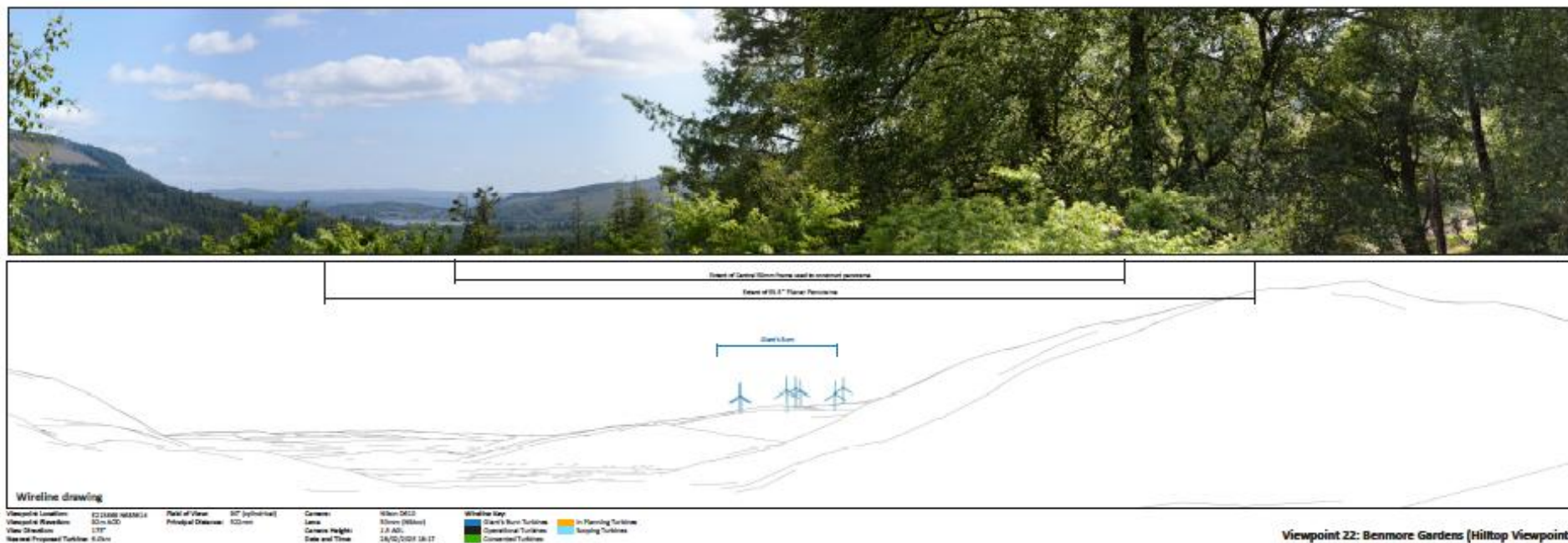


Figure 10 View Point 22: Benmore Garden (Hilltop Viewpoint)



Viewpoint Location:	E218305 N582190	Field of View:	53.5° (planar)	Camera:	Nikon D610
Viewpoint Elevation:	385m AOD	Principal Distance:	812.5mm	Lens:	50mm (Nikkor)
View Direction:	23°	Paper size:	261 x 297mm	Camera Height:	1.3 AGL
Nearest Proposed Turbine:	4.7km	Printed image size:	820 x 260mm	Date and Time:	12/01/2025 10:06

Viewpoint 23: Strone Hill

Figure 11 View Point 23: Strone Hill



Viewpoint Location	ES22779 4850637	Field of View	35.1° (diagonal)	Camera	Wilson DM12
Viewpoint Elevation	753m AOD	Principal Distance	822.8mm	Lens	82mm (35mm)
View Orientation	180°	Paper size	A4 x 307mm	Camera Height	1.2m AGL
Nearest Proposed Turbine	13.7km	Printed Image size	820 x 385mm	Date and Time	18/10/2023 15:48

Viewpoint 24: Beinn Mhor

Figure 12 View Point 24: Beinn Mhor

J – Kilmun, Graham's Point



Figure 13 Illustrative viewpoint J – Kilmun, Graham's Point

K – Kilmun, Arboretum viewpoint



Figure 14 Illustrative viewpoint K - Kilmun, Arboretum Viewpoint

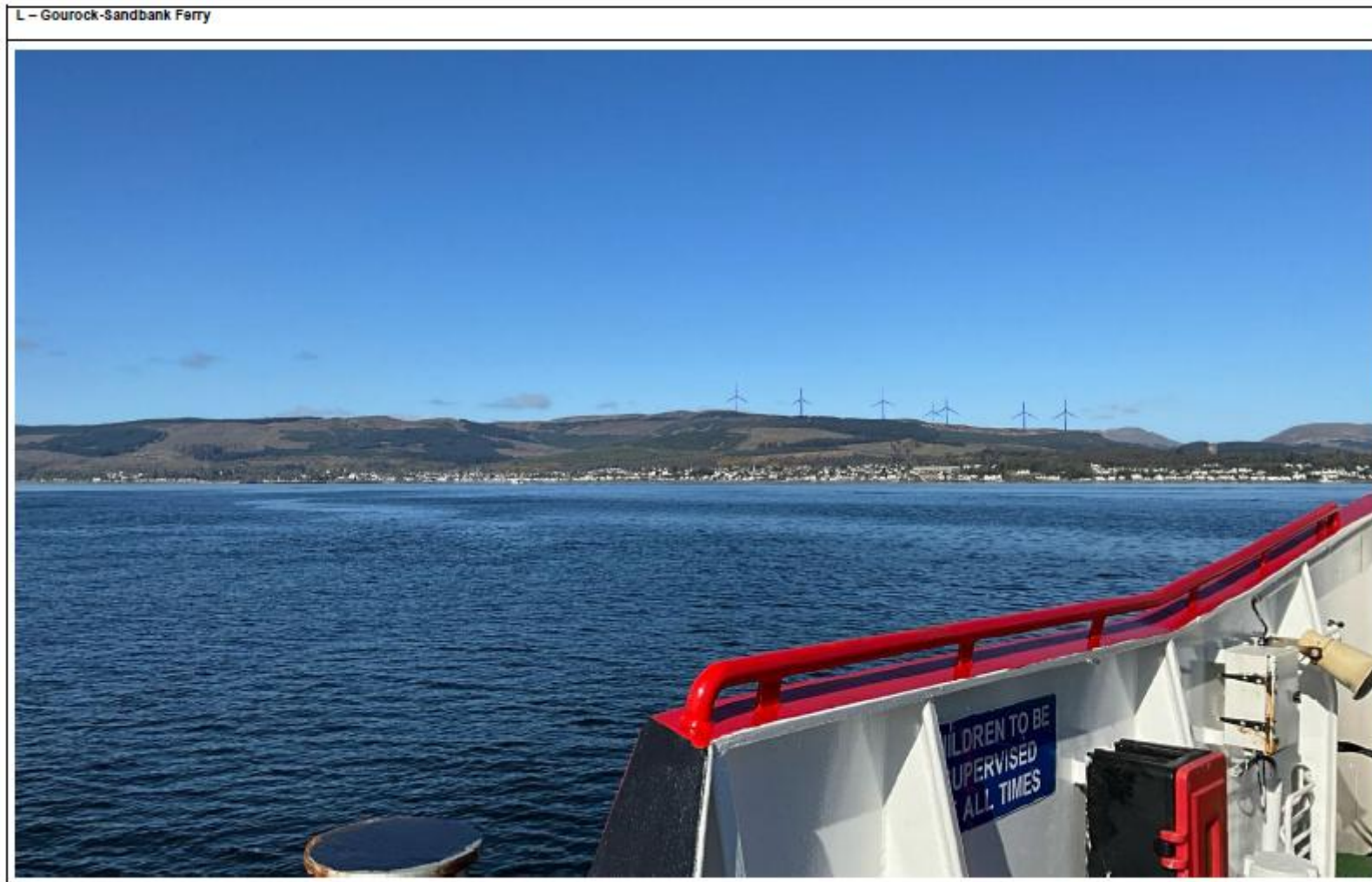


Figure 15 Illustrative viewpoint L – Gourock-Sandbank Ferry

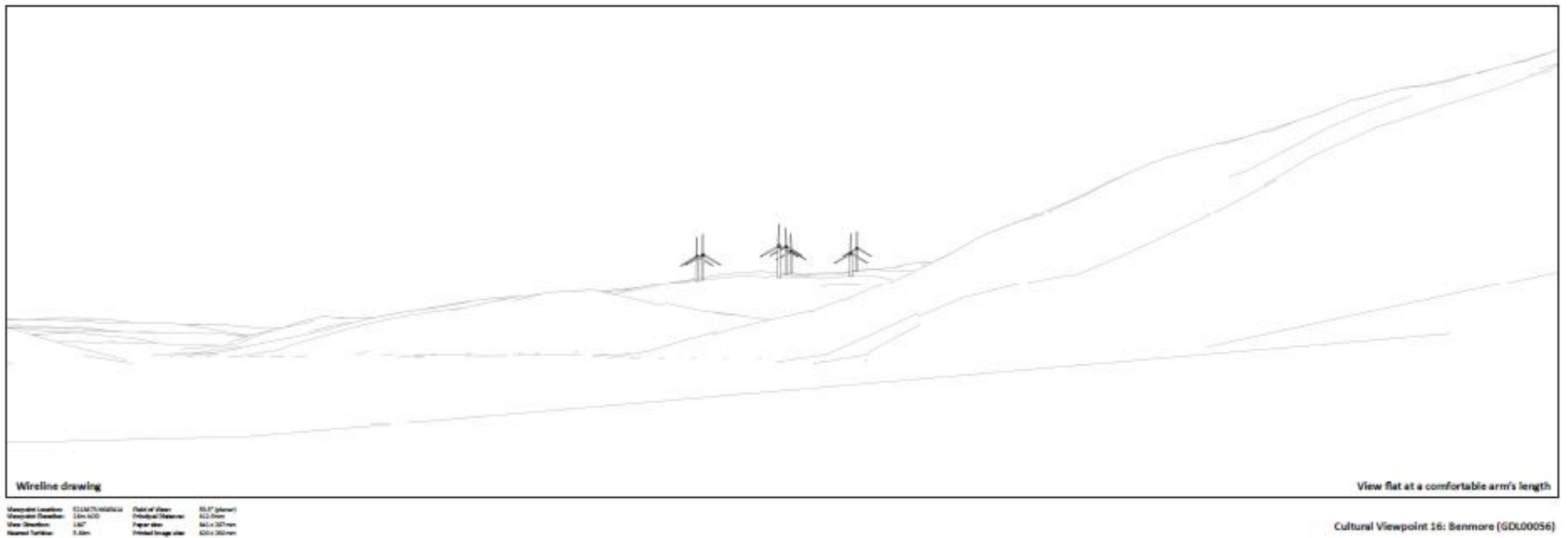


Figure 16 Cultural Viewpoint 16 – Benmore

Appendix 3 – Planning History

Application site

The site was previously considered by NatureScot as Application Eilligan / formerly Strone Saul Hill Wind Farm (2009) (eight turbines 125 m blade tip height), largely within the proposed development site. SNH (NatureScot) objected February 2010 to the proposals based in part on anticipated significant adverse landscape and visual effects on a number of landscape character types (LCTs), the National Park, Areas of ABC (Argyll and Bute Council) Panoramic Quality (now LLAs), Clyde Muirshiel Regional Park, Benmore Botanic Gardens, and visual receptors within Dunoon, Gourrock, Kilcreggan, Greenock, Inverkip, and the Firth of Clyde including key ferry routes. The application was refused 13th August 2010 by Argyll and Bute Council, based in part on potential for significant landscape and visual effects similar to previous applications outlined below, no appeal was lodged.

Other relevant planning applications in close proximity to the site

Application Black Craig Wind Farm (2006) (19 turbines 100 m blade tip height), approximately 1 km southwest of the site. SNH (NatureScot) objected to the proposals November 2006 on nature conservation and landscape/visual grounds of which the underlying landscape character, highland and coastal context was noted as being relatively unmodified by development. The application was refused 9th March 2007 by Argyll and Bute Council, based in part on potential for significant landscape and visual effects where the proposed development was seen as incompatible with highly valued landscapes, coasts, semi-wilderness, panoramic qualities, outstanding conservation areas and historic landscapes. A revised layout for 16 turbines went to public inquiry, the Scottish Ministers' Decision 22nd September 2009 upheld the Argyll and Bute Council decision.

Application Corlarach Wind Farm (2007) (14 turbines, 125 m blade tip height), approximately 3.4 km south of the site. SNH (NatureScot) objected November 2008 to the proposals based in part on anticipated significant adverse effects on landscape and coastal character, effects on the Southern Cowal peninsula, the Firth of Clyde, the Clyde coast and the east coast of Bute. The application was refused 1st February 2008 by ABC, based in part on potential for significant landscape and visual effects including that the proposed turbines would dominate the western moorland ridge above the Firth of Clyde Corridor. A revised layout for ten turbines went to public inquiry, the Scottish Ministers' Decision 27th May 2009 upheld the decision by Argyll and Bute Council.

Scoping Bachan Burn Wind Farm (2013 - 2018) (15 to 25 turbines between 110 m and 145 m), approximately 1.6 km southeast of the site comprised. The SNH (NatureScot) scoping response December 2013 stated that an objection would be likely given that effects would be similar to previous nearby applications with anticipated significant adverse effects on South Cowal, the highly sensitive coast, the National Park, and the Firth of Clyde. The application was withdrawn.

Vale of Leven ECU00003468: Ten wind turbines with blade tip up to 250m in height, Battery Energy Storage System (BESS) with a capacity up to 20MW. Additional information submitted reduces tip height to 220m. This application is within West Dunbartonshire Council area. The National Park lodged an objection to the ECU on 1 March 2024. The application was referred to the DPEA on 25 September 2025 and a public inquiry will be taking place in due course.