

Electricity Act 1989

Town and Country Planning (Scotland) Act 1997 as Amended

GIANT'S BURN WIND FARM proposal - Reference: ECU00005007

Argyll & Bute Council - Reference: 25/01342/S36

OBJECTION by Save Cowal's Hills

to an application by GB Wind Farm Limited, a wholly owned subsidiary of Statkraft UK Limited (Statkraft) for a 'hybrid' project comprising 7 industrial sized wind turbines along with a substantial Battery Energy Storage System (BESS) and a range of associated infrastructure.



Submitted: 31st August 2025 via email only

CONTENTS OF OBJECTION

FOREWORD

1. POLICY AND LEGAL ISSUES

- 1.1 NPF4, LDP2
- 1.2 Components of an EIA-based Application
- 1.3 Needs and Benefits Case

2. PRIMARY ENVIRONMENTAL IMPACTS

- 2.1 Site and Design
- 2.2 Landscape and Visual
- 2.3 Socio-economic Impact and Tourism
 - 2.3.1 The Local Context
 - 2.3.2 Tourism
 - 2.3.3 Property Values
 - 2.3.4 Economic Benefits to Local Economy
- 2.4 Ecology and Biodiversity
- 2.5 Peat and Hydrology
 - 2.5.1 Consistency with NPF4
 - 2.5.2 Holy Loch Nature Reserve (HLNR) and Local Nature Conservation Site (LNCS)
 - 2.5.3 Peatslide Risk Assessment

3. OTHER DIRECT IMPACTS ON RESIDENTS AND THEIR PROPERTIES

- 3.1 Public Health and Amenity
- 3.2 Cultural Heritage
- 3.3 Transport and Access
- 3.4 Infrastructure and Risk/BESS

4. CONCLUSIONS AND RECOMMENDATION

FOREWORD

Save Cowal's Hills is an Environmental Conservation Group with a history of representing Cowal's communities since the Bachan Burn Windfarm proposal in 2014. The group brings together people and organisations from around the wider area (Dunoon, Toward, Innellan, Kilmun, Strone and Sandbank) and comprises a wide range of concerned residents including many with relevant experience and professional expertise. The group also in-reaches to, and collaborates with groups and concerned residents in Inverclyde, Ayrshire and Bute.

This is no less than the *fifth* time that there has been an application in Cowal's hills. Two of the earlier applications went to Public Local Inquiry (Corlarach Hill, *West Coast Energy*, 2008, and Black Craig, *Argyll Windfarms*, 2009) where they were refused on the grounds of unacceptable visual impact (at turbine heights considerably less than those proposed in this application). Another application was eventually withdrawn in the face of significant public protest: Strone Saul (*Infinergy*, 2009) - very nearly the same site as the currently proposed Giant's Burn Wind Farm.

This formal objection is based on review of the Environmental Impact Assessment (EIA) and accompanying documentation, with reference to policies within the National Planning Framework (NPF4) and relevant policies within Argyll & Bute's Local Development Plan 2 (LDP2), and with reference to Argyll & Bute's Indicative Regional Spatial Strategy (iRSS; 2020). We note that Argyll & Bute's Statutory Regional Spatial Strategy is still in progress. Critically this objection it is also informed by our extensive engagement with local communities, and several respective community councils, via public meetings, newsletters, leaflets and social media.

The considered rationale underlying this objection is summarised at the end of the document.

We strongly recommend that this proposed Wind Farm and Battery Energy Storage System development is refused permission. We fully expect to participate in any formal hearing or PLI which may be deemed necessary.

1. POLICY AND LEGAL ISSUES

1.1 NPF4, LDP2

The Argyll & Bute local Development Plan 2 was adopted in February 2024, replacing the 2015 Local Development Plan. Statute provides that the later in date of NPF4 and any adopted Local Plan should prevail in the event of any conflict or ambiguity. LDP2 of course incorporates NPF4 by law.

We note a number of statements by the developer that we wish to highlight before proceeding further:

Firstly, in Chapter 4 (Approach to Environmental Impact Assessment) of the EIA we note the following statement in the agent's description of their approach:

4.10.22 Any effects associated with the Proposed Development are considered to be adverse except where it is stated that they are beneficial. It is worth noting that an effect assessed to be significant does not necessarily mean it is unacceptable. This is supported by Policy 11 of NPF4 where it is noted that it is recognised that significant landscape and visual impacts "are to be expected for some forms of renewable energy. Where impacts are localised and/or appropriate design mitigation has been applied, they will generally be considered to be acceptable".

Secondly, in Chapter 5 (Landscape and Visual Impact Assessment) we note this statement:

5.3.5 The OWPS also notes within the section relating to landscape and visual impacts that outside of National Parks and National Scenic areas the criteria within NPF4 include "stronger weight being afforded to the contribution of the development to the climate emergency" and that "Landscape Sensitivity Studies (LSS) are strategic appraisals of the relative sensitivity of landscapes ... a tool to help guide development to less sensitive locations. ... LSS should not be used in isolation to determine the acceptability of a development type in landscape terms..., however they will continue to be a useful tool in assessing the specific sensitivities within an area."

Taken together, these statements as framed read as though the developer is wholly unconcerned by the visual or landscape impacts of their proposal, and instead is at risk of interpreting aspects of NPF4 as carte blanche to approval. We argue that the proposal would have a landscape and visual impact far greater than what could be considered 'localised', affecting as it does a large area on both sides of the Firth of Clyde. We will discuss this and other concerns throughout, and in detail, with direct reference to all relevant policies in NPF4 and other applicable official policies and guidelines.

It seems pertinent here to underscore our understanding that under NPF4 there is NO statutory or policy presumption in favour of 'the developer' (or any development generally) for Section 36 (S36) planning applications. Commentary and case-focused analysis since NPF4's adoption consistently note that the older Scottish Planning Policy presumption (and the 'tilted balance') no longer applies. S36 decisions are guided by the Electricity Act 1989, relevant duties under Schedule 9, and the Local Development Plan, including NPF4. Significant weighting under NPF4 *does not mean* to the exclusion of all other policies to be assessed. Schedule 9 of the Act is entitled 'Preservation of Amenity and Fisheries'. The main text of the Schedule refers to the 'desirability of preserving natural beauty, conserving flora, fauna and geological or physiographical features of special interest and of protecting sites, buildings and

objects of architectural, historic and archaeological interest'. Schedule 9 statements '*focus particularly, though not exclusively, on nature conservation, scenic, historic, recreation, architectural or archaeological values. This focus is reflected in the draft guidance and model statement*'.

1.2 Components of an EIA-based Application

A material deficiency in the EIA concerns the assessment of the "project" as a whole. An electricity generating station of whatever type is useless without some means of transmitting power to the end user. In the same way, a power line, whether overhead or underground, is useless without a source of generation. The two are interdependent. The project's grid connection does not form part of this application under the Electricity Act, 1989. It is to be assumed that this is the rationale for this EIA not providing any information on the environmental effects arising from the required grid connection.

3.2.13 to 3.2.15 states:

'The grid connection point for the Proposed Development is subject to confirmation by the network operator. It is current anticipated that the Proposed Development will connect to Dunoon substation. The precise route of the grid connection cabling has not yet been determined and its effects are not identifiable/assessable because it has yet to be designed and an application has not yet been made. The grid connection application will be made by SSEN who are responsible for the transmission and distribution of electricity in Argyll and Bute.'

We assume of course that the applicant feels that it is fine to state that an application for connection would be made later and there is no notion that the grid connection *should* form part of this project. The applicant does not make a statement beyond the above, however a relevant consideration in determining the nature of a projects relates to functional interdependence – where one part of a project could not function without the other. So here we have a hybrid development proposed for wind turbines, and BESS, but it is not considered relevant to add in the grid infrastructure to aid in assessing the project? We view this as a serious failing even if the decision-makers are willing to allow such incompleteness

1.3 Needs and Benefits Case

In the EIA Introduction (1.1.4) it states: '*It is expected that each wind turbine would be rated at approximately 7.2 MW giving an anticipated total installed capacity of approximately 50.4 MW. This equates to enough power for over 58,212 average Scottish households, which would be a significant contribution to the green energy requirements in the Argyll and Bute Council area. This is based on a 50.4 MW Installed Capacity, wind resource assessment and average Scottish domestic consumption of 3,099 Kwhpa (DESNZ 2023).'*'

This energy calculation is misleading:

1. To begin with, since the change to 180m heights for some of the turbines, it would be expected that this would change the rating of those turbines in comparison to the 200m version. If this is true, then the total would be less than 50.4 MW.
2. Supply of energy is mis-stated because it does not take account of the times when the wind is either too weak or too strong; and demand for energy is mis-stated because household demand

varies hugely across the 24-hour day and as well across different days of the week and times of the year. A more accurate *illustration*, detailing more transparently the *hypotheticals* involved to qualify such claims, is required. The figures provided are theoretical only as they do not deal with matching supply and demand in real time *per se*. The battery supply is limited, and curtailments are inevitable. There is NO statement of the expected level of back-up that would be required from the National Grid, however conservatively indicated, to achieve what is casually stated here.

3. Finally, average Scottish household consumption is not a relevant parameter. In Argyll and Bute the climate is quite different from the all-Scotland average; because of winds and rains and dampness, and the lack of any big cities. Average consumption in Argyll & Bute is greater than the all-Scottish average.

According to the most recent Scottish Government Data on regional renewable electricity by local authority, Argyll & Bute, with an estimated number of households at 42,664, has no less than 122 onshore wind installations and no less than 127 hydro installations. The Highlands, with a population of 111,633 households, has 276 onshore and 307 hydro installations. Both areas alone are contributing on an *enormous* level already. The latest figures for wind energy production in Scotland show that onshore targets are well on track **without** any new onshore windfarms.

Renewable electricity: number of installations at Local Authority Level - as at end of 2023									
This worksheet contains one table									
Some cells refer to notes which can be found on the notes worksheet.									
Local Authority Code [note 1]	Local Authority Name [note 5][note 6][note 7] [note 8][note 9]	Region	Country	Estimated number of households [note 2][note 3][note 4]	Photovoltaics	Onshore Wind	Hydro	Anaerobic Digestion	Offshore Wind
S12000033	Aberdeen City	Scotland	Scotland	109,827	3,663	8	2	1	1
S12000034	Aberdeenshire	Scotland	Scotland	114,897	15,521	589	15	5	2
E07000223	Adur	South East	England	27,678	1,261	2	0	0	0
E07000032	Amber Valley	East Midlands	England	56,277	2,769	9	5	0	0
S12000041	Angus	Scotland	Scotland	55,441	4,789	90	17	4	0
S12000035	Argyll and Bute	Scotland	Scotland	42,664	2,643	122	127	0	0
E07000224	Arun	South East	England	72,661	4,042	1	0	1	0

FIGURE 1: Renewable electricity: number of installations at LA level ([Regional Renewable Statistics - GOV.UK](#))

Having regard to the *Clean Power 2030 Action Plan*, Scotland already has more than sufficient renewable generation capacity for its own consumption, and is contributing well beyond its limit.

The conclusion is that there is no demonstrable need for any new onshore wind farms in Argyll & Bute, let alone Scotland. The energy produced from this proposed development would be exported out of Scotland to the benefit of Statkraft's shareholders. Argyll & Bute Council should be rightly proud of all it produces, and especially those landscape-friendly and world-leading renewable energy projects it is noted for. This development, by contrast would be low-yielding in economic terms and landscape-transforming in the worst of ways.

Argyll and Bute has pioneered renewable energy development in Scotland with the hydro-electric Cruachan Dam development entering full service in 1967. Its capacity is 440MW. Cruachan 2, which

will add a further 600 MW, was consented by the Scottish Government in July 2023. This proposed development would add a mere 73MW for which there is no pressing national need.

2. PRIMARY ENVIRONMENTAL IMPACTS

2.1 Site and Design

The Electricity Act 1989, by Schedule 9 (3)(1)(b), requires that an applicant “shall do what he reasonably can to mitigate any effect which the proposals would have on the natural beauty of the countryside or on any... flora, etc...”. Decisions are to be made in the public interest. Obviously, the best form of mitigation of adverse impacts is careful and appropriate site selection.

The proposed development is situated within a sensitive and highly visible upland landscape overlooking Dunoon, Sandbank, and the Holy Loch, with the turbine array extending across an exposed ridgeline to the west of Loch Loskin. The summits of The Socach (506m), Giants Knowe (446m), Bishop’s Seat (504m), Big Knap (452m) and Eilligan (469m) form a distinctive ridge along the south-east of the site, which descends westward into the valley of Glenkin.

The site lies within a Landscape Character Type (LCT) categorised by NatureScot as “Steep Ridgeland and Mountains Landscape Character Type, which forms the upland areas between Loch Fyne and the Firth of Clyde’. It is known for its open character and hence unsuitability for artificial structures of such an industrial scale that it would dominate and overpower the surrounding landscape and entirely change views from critical viewpoints.

The design includes turbines of exceptional height, out of scale with any existing infrastructure in the region, and sited on an elevated ridge clearly visible from surrounding settlements and transport corridors. The BESS compound has been inserted into the design without any meaningful justification regarding its location, environmental context, or proximity to sensitive residential receptors.

The landscape and visual impacts are not localised, but widespread. It is clear that they have NOT been subjected to any form of mitigation by design or careful site selection. At the Dunoon Community Council meeting at which Statkraft presented, in 2024, during the brief Q&A session at the end, the following question was asked of one of the Statkraft representatives: *“The findings of previous PLIs found decisively that this location was totally unsuitable for industrial windfarms. What has changed?”*

The reply was “NPF4”!

It is reasonable to conclude that the location of the proposal is dictated by landowner willingness and developer choice. The magnitude of change to this landscape from key viewpoints is judged to be HIGH. This proposal is NOT ‘the right development in the right place’.

2.2 Landscape and Visual

The Giant’s Burn Wind Farm is proposed within a highly prominent setting and is wholly disproportionate both in scale and character to the local landscape, sited on high ground overlooking the Holy Loch and standing out on the beautiful vista of the approach to Dunoon by ferry. It would be in

clear view of users of multiple core paths and other walking trails in the area. The site is also adjacent to the Loch Lomond and Trossachs National Park, and such an industrial scale development is incongruous with the status of the area as ‘The Maritime Gateway to the Highlands’.

Argyll & Bute’s LDP2, in para 5.29 states:

“In assessing the environmental effects of a proposed development the EIA should have regard to all applicable Local Development Plan 2 policies and any supporting guidance which accompanies these. In considering landscape and visual impacts, Policy 30 should be read in the context of the development plan as a whole including the objectives and principles of NPF4 and its topic specific policies including Policy 11. In terms of landscape, and cumulative landscape impacts, guidance is provided within the Argyll and Bute Landscape Wind Energy Capacity Study 2017 (ABW17).”

ABW17 is highly relevant to the material considerations of decision-making in this instance. The Scottish Reporters, when considering Policy 30 in relation to the Argyll & Bute LDP2 in 2023, concluded that albeit the guidance is non-statutory, it remains a material consideration in the determination of planning applications for windfarms. **ABW17 states that there is no capacity in any part of Argyll and Bute for turbines in excess of 150m.** It is a thorough study of the capacity of the Argyll & Bute landscape to integrate windfarms whose purpose is to inform strategic planning for windfarm development and to provide guidance for use when considering specific proposals. *“Any development would need to be set well back from the outer edges of these uplands to minimise effects on surrounding more sensitive landscapes.”*

‘Turbines should be sited away from the small scale glens and lochs where they would dominate their scale and detract from the diverse landform, vegetation cover and settlement. They should also avoid intrusion on the prominent skyline ridges enclosing these glens....’ This application fails to evidence any recognition of the evidence contained within this report.

The applicant’s own visualisations show widespread Zone of Theoretical Visibility (ZTV) coverage, affecting public roads, residential areas, tourist viewpoints, and walking routes. The turbines would dominate skyline views from Dunoon and Sandbank, breach scenic ridgelines, and cause substantial visual clutter across open upland frames. These impacts are not mitigated by distance, transient vegetation or forestry, or topography.

The development also lies immediately adjacent to the Cowal Area of Panoramic Quality (APQ)—a locally protected designation under the Argyll and Bute LDP2 intended to safeguard exceptional scenic areas from intrusive or disproportionate development. The EIA fails to demonstrate that the proposal respects this designation or avoids degrading the coherence of key panoramic views. This also contradicts the expectations the visual and landscape safeguards set out under NPF4 Policy 11(d–e). In addition, the requirement for aviation lighting which would be in operation approximately 11 hours per day would irrevocably alter the experience of dark skies across the Holy Loch and beyond.

As referenced in NatureScot - Siting and designing windfarms in the landscape (Aug 2017, version3a)

“3.26 Skylines are of critical importance. This is illustrated by the contrast between the simple, horizontal skylines of wide, flat landscapes and the more complex, vertical and diagonal components of skylines formed by mountains and hills. The viewer’s eye is naturally drawn to the skyline, although the extent to which this happens depends on the nature of the skyline, the distribution and type of other elements and foci within the scene. The skyline may be especially valued if it conveys a sense of wildness; forms the backdrop to a settlement; is a particularly distinctive landform, or where notable landmarks and/or cultural features appear on it.”



FIGURE 2: GIANT’S BURN WINDFARM (proposed scoping layout 05/24. Viewpoint: Lyle Hill, Gourock.
 Note: visualisations prepared to NatureScot guidance: <https://www.nature.scot/doc/visual-representation-wind-farms-guidance>

On the topic of the applicant’s visualisations, we wish to raise issues with the overall standard of that provided:

- 1: Certain views show only trees & bushes, eg: Viewpoint (VP)22-Benmore Gdns Viewpoint: CVP 2-Ardgowan House.
- 2: Too many VPs show wireframe diagrams only, eg CVPs 7-13; 15-17.
- 3: Many visualisations minimise the relief, thereby reducing visual impact, due in part to the wide rectangular model used. In many, the visual impact is understated due to white or grey cloud backgrounds or haze, eg VPs 2, 4, 7, 12, 13, 14,15,17,18,19,20. 1

3: Acute Visual Impact References: 1: It is clear that the visual impact of the giant turbines as seen from Ardnadam VP1, Kilmun, (CVP 5 ‘Kilmun Collegiate Church’), VP 23 Strone Hill, VP8 Dornoch Point, VP13 Lyle Hill, VP 14 McInroy’s Point, & VP15 Lunderston Bay would be very severe.

Additionally in the ‘Illustrative Views’ section of Statkraft’s ES, Vol 4, Technical Appendices 5.3, the views at Cromlech Rd, Sandbank (A), Dunoon Esplanade at Queen St (F), Dunoon Dixon St(I), & Glenkin Cottage (R1) show visual impact to be severe. 2: The night time photomontages (eg VP 5) show the red aviation lights which are planned to be highly intrusive, potentially ruining our area’s West Highland ‘dark skies’.

Inverchaolain Wind Farm (in scoping)

Additionally, whilst the proposed neighbouring Inverchaolain Wind Farm is at the scoping stage, it is reasonable to expect greater reference to this in the EIA. The latter proposal is for 13 further 200m high turbines, on the Black Craig Ridge just south-west of Dunoon’s Bishop’s Seat. The Inverchaolain site is adjacent to the Giant’s Burn Wind Farm site with its proposed 7 equally-giant turbines.

The visual impact of the proposed Inverchaolain Wind Farm alone, particularly for views from Bute northwards, would be severe, and because the site is so high (500m) these turbines would be highly visible also from the Inverclyde/North Ayrshire coast, the Shore villages of Kilmun and Strone, Kilcreggan, and all the Upper Clyde ferry routes. Together with the close proximity of the Giant’s Burn site to the Loch Lomond & Trossachs National Park, the combined windfarms’ 22 turbines would make a mockery of the established history of this area as a “Gateway to the Highlands”. The risks of approving any windfarm at this location are enormous, opening the door for *cumulative* destruction of these coastal landscapes and threatening NSAs such as the Kyles of Bute NSA.

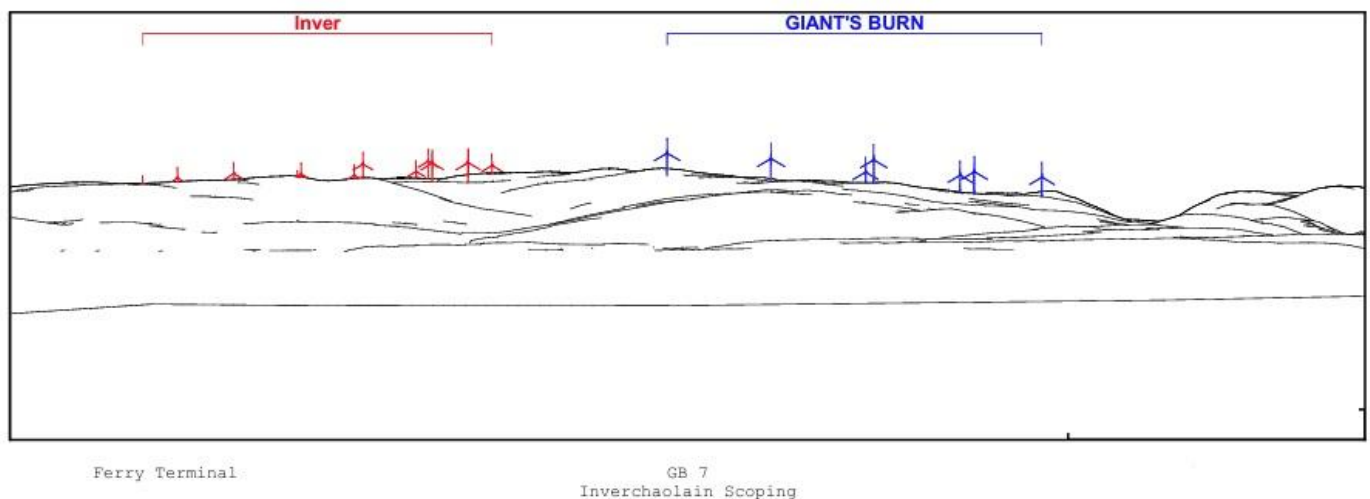


FIGURE 3: cumulative wireframe from Western Ferries terminal, McInroy’s Point, GOUROCK

In sum, the proposal introduces an industrial scaled development with wind turbines of colossal proportions, in a prominent, sensitive, and renowned landscape. The visual impacts are unacceptably

high, unmitigated, and inconsistent with national and local policy. To suggest that any windfarm in these landscapes could have a ‘localised’ effect is simply disingenuous.



FIGURE 4: cumulative visualisation from Western Ferries terminal, McInroy’s Point, GOUROCK

2.3 Socio-economic Impacts and Tourism

The question here is how the applicant’s proposal aligns or dovetails with positive outcomes with (any of) these aims, and naturally one turns to the EIA to examine this in more detail. However there is NO expected chapter in the EIA devoted to the important topic of socio-economic benefits!. Instead there is a ‘supplementary’ high level document entitled ‘Giant’s Burn Socio-Economic Benefits Report’.

Therein it is stated: *‘Overall, Statkraft and its Giant’s Burn Wind Farm are set to provide lasting economic, social, and environmental value to the local community and beyond.....’*

The document has nothing which is specific to the area in any *meaningful* way e.g. there are a few loose statements like (3.4.3) where it states *‘the Applicant followed up with a letter of intent to Cowal Community Energy committing to further discuss Community Ownership of part of the Proposed Development’.....* For other items there is mention of ‘dialogue’ with respective parties such as The Dunoon Project. To round off the lack of context specificity in this supplementary document, mention of ‘a circular trail around the proposed site’ as well as ‘improved access to the Bishop’s Seat’ are bewildering to read about in the context of an area with such an abundance of amenity in terms of walking, cycling and other outdoor activities.

2.3.1 The local context

The Argyll & Bute Council Economic Strategy Refresh (2024-2034) strategic vision is about *‘creating a place-based and people-centred economy that delivers shared prosperity and sustainable business growth through innovation and collaboration. The strategy is both ambitious and forward looking, with a place-based and business/person centred approach, to secure a fair, inclusive, and prosperous future*

for the area, more resilient to external factors including the rapid advances in digital technology and increasing impacts of climate change.'

The 4 pillars of this strategy are *People, Place, Planet* and *Prosperity*, and rightly so Community Wealth Building is at its heart. This involves of course Argyll & Bute Council building on its existing strengths, realising the benefits from our natural capital opportunities and taking advantage of new innovations and technologies. The priority sectors identified in the Indicative Regional Spatial Strategy for Argyll and Bute are:

- tourism
- food and drink (including aquaculture and distilleries)
- creative industries
- renewables
- forestry
- marine science and engineering

Three major areas of existing growth potential are identified in Argyll and Bute, one of them being the Argyll and Bute Western Seaboard. Argyll and Bute's economy and population is intricately connected with its lengthy coastline and significant maritime activity. There are a multitude of opportunities in both emerging and existing marine activities such as: aquaculture, commercial fishing, sustainable seaweed farming, offshore renewables, marine tourism, other marine leisure and maritime scientific research. There is no indication of a strategic need or priority for onshore windfarms along the coastal areas of Argyll.

Furthermore, it is worth underlining, in the absence of any comprehensive detail provided by the applicant, that Argyll & Bute's LDP2 (5.28) states that the Council:

*'will seek to ensure that the renewable energy industry plays an important role in developing our local economy and will encourage initiatives that promote local procurement, recruitment and training opportunities associated with all proposed new renewable energy projects. **The Council in seeking to support the further development of renewables throughout Argyll and Bute also recognises that there is a need to protect and conserve our outstanding environment, including our landscape and protected species, local communities and other sectors of our economy from unacceptable environmental effects that may result from proposed renewable energy developments.** Consequently, the main aim of this policy is to ensure that renewable energy generation projects are delivered in an all-round sustainable manner.'* (in bold, our emphasis)

It is clear to us that Argyll & Bute wish to take a balanced approach to renewables developments, weighing fully all the factors to be considered as per any large-scale project requiring an EIA.

2.3.2 Tourism

Tourism is truly the *Golden Goose* of Argyll & Bute. The region has comprehensively outperformed Scotland as a whole in terms of tourism. The Argyll and Bute Western Seaboard has an outstanding natural environment with over 119,000ha within National Scenic Areas, areas of Wild Land, nationally important habitats and a range of tourist attractions. This *Golden Goose* directly contributed over £400m, to Argyll & Bute economy in 2022, with over 2.4 million visits. The economy of Dunoon and Cowal is heavily reliant on tourism, the number one local employer, as it is for Argyll and Bute as a whole. The area's tourism is rooted in the beauty of our natural and historic heritage, the scenic landscapes which have drawn visitors to our area for the past 150 years. Unspoiled natural landscapes of mountain and water such as ours are increasingly scarce in Britain and represent the crucial economic base for our area's economy.

The very essence of what brings people here will be damaged if gigantic wind turbines are allowed to be built on the hilltops above Dunoon. That would completely change – and ruin - our scenic environment. Think for example how it would dominate the views all along the Clyde Estuary, so that visitors coming on Western Ferries would not look across to a natural landscape but would instead see a spoiled vista of monstrous industrial machines which would dwarf everything else. It would hugely impact the growing cruise ship business for whose passengers the scenic cruise to and from Greenock is so unique in its vistas of natural beauty.

Most people who travel here for holidays, as well as those who invest in holiday homes at Hunter's Quay and elsewhere in the area, will not wish to sit in the shadow of giant turbines less than 2km away. The margins for businesses relying on tourism are tight given seasonality and the tourism sector is already fragile, so anything which impacts negatively will hit hard: businesses will be closed and jobs will be lost. Even local business which are not directly dependent upon tourism will suffer from the loss of spending by visitors.

It is worth harking back to the summary of a Scottish Government Reporter for the Corlarach Hill Wind Farm (2008), Public Local Inquiry. She concluded that *'the proposal fails under criteria relating to impacts on communities, scenic quality, general amenity, tourist routes, and the prime tourist attraction of scenic quality'*.

An often-quoted study by developers of windfarms in this regard is that conducted by BiGGAR Economics (2021). In this study they examined whether there is a link between the development of wind farms and changes in patterns of tourism spend and behaviour, finding that trends at a local authority level showed that *"there is no new evidence to contradict the earlier findings that wind farms have little or no adverse impact on tourism in Scotland"*. We have reviewed this study in detail and note (1) it's datedness – data goes back to mid-2010s and (2) the lack of data which could be reasonably extrapolated to Argyll.

2.3.3 Property values

People who have homes close to wind turbines, or in locations which are visually impacted by them, are likely to suffer a decline in the value of their properties. The damage to the local housing market would be made worse by the shrinking of the tourism economy and many local people will suffer. In Gourock and North Ayrshire the numerous people who invested in homes on the coast to enjoy the views over to Dunoon will not only find their outlook spoiled but also see the value of their homes drop.

Dunoon and Cowal have benefited greatly in recent decades from a steady in-flow of people – especially retirees – who have moved to the area precisely because of its quality of life and its scenic beauty. This inflow has helped to maintain the population and sustain the local housing market; spending by these households has helped maintain the local economy. However, these incomers generally can choose where to settle – and it is concerning to think how many will continue to remain in Cowal when the peace, tranquility and unspoiled beauty which drew them here can no longer be found?

2.3.4 Economic ‘benefits’ to local economy

Statkraft claim that their proposed Giant’s Burn Wind Farm project will “provide lasting economic, social and environmental value to the local community”. However they provide no credible evidence for these vague claims of economic benefit. In reality, experience around Scotland shows that very little local employment is created even for the construction phase and virtually none for the operating phase. Equally, there are few if any indirect economic benefits. Statkraft’s general contributions to education, which are in no way connected to the Giant’s Burn Wind Farm project, almost exclusively benefit other areas of Scotland. Their only specific claim for benefitting the local community is the proposed ‘community benefits funds’, but this is not a material consideration within the criteria laid down for assessing proposals. In truth, as their report shows, Statkraft fail to show any significant benefits accruing to the local community.

As mentioned, there is an absolute absence of detail on the issue of socio-economic benefits in the EIA. It is interesting to note however that Statkraft have managed to provide an entire chapter on ‘Socio-economic benefits, Recreation and Tourism’ in their Oliver Forest Wind Farm (ECU00004669) proposal in the Borders - ironically a windfarm that is similar in scale (7 x 200 metre turbines). Therein the report details an assessment utilising a three-tiered study area for the quantitative and qualitative characteristics of the assessment. The quantitative economic and employment aspects are defined by the Wider Study Area (WSA) and the Local Study Area (LSA), whilst the qualitative tourism and recreation aspects are defined by the Local Area of Impact (LAI). This level of detail would be helpful should the applicant be requested to provide more than passing reference in this regard for the Giant’s Burn Wind Farm proposal. Of interest, it was noted in that EIA (Oliver Forest Wind Farm):

*‘There are expected to be **three permanent employees** for the operation of the Proposed Development, as such, the increased demand for permanent housing, health or educational services would be negligible and therefore effects on these are scoped out of further assessment.’*

AND

*‘Based on past experience of onshore wind farm projects **of this scale**, it is not expected that there would be a large influx of workers’ families to the area during the construction phase (estimated to last for approximately 18 months) and **those who would be working in the area would be there temporarily**. Therefore, it is not expected that there would be a significant effect on the demand for permanent housing, health or educational services.’*

(Oliver Forest Wind Farm; 14.3.4)

Beyond this supplementary report we could only find one further reference to jobs in the Giant’s Burn Wind Farm EIA: in Chapter 3, (3.7.6), where it is stated that it *‘is anticipated that the Proposed Development would employ up to three local members of staff during its operational period’*.

In the absence of more comprehensive information on possible socio-economic benefits, as absent in this EIA, we assume it is reasonable to draw some gloomy conclusions about the likely socio-economic impact on Dunoon and surrounds of a windfarm ‘of this scale’. Statements such as *‘the Proposed Development alone is expected to contribute an estimated £39 million in direct GVA, with direct and indirect job creation during both the construction and operational phases’* are too high level to interpret in terms of meaning in the local context and that of Argyll & Bute.

2.4 Ecology and Biodiversity

The proposed site, being largely undisturbed on a regular basis by human activity, is home to a large variety of birds, insects, amphibians and mammals, many of which are protected and a significant number endangered. The development area for Giant’s Burn Wind Farm lies across a matrix of habitats that include peat-forming vegetation, riparian corridors, wet flushes, and upland open ground, all of which serve as vital ecological networks for species such as otter, bat, pine marten, and ground-nesting birds. While the developer acknowledges the presence of biodiversity features, the EIA presents an incomplete and poorly evidenced assessment of ecological risk.

Golden eagles, white-tailed eagles, hen harriers, ospreys, buzzards, barn owls, long-eared owls and other protected raptors have been regularly spotted hunting in the area of and surrounding the proposed site. Nesting activity has been observed in the area, and of concern is the evidence to suggest that raptors, in particular golden eagles are likely to be displaced from turbine developments. There is also evidence to suggest that these species are at a high risk of collision. The impact of newer turbines with increased height and blade diameter is only now becoming clearer and international studies suggest an increase in the level of risk.

2.5 Peat and Hydrology

2.5.1 Consistency with NPF4

The natural resources of Argyll and Bute present a significant opportunity to mitigate climate change with many natural capital investment opportunities that can both benefit communities and grow

business in the area. The area has significant carbon sequestration resources in terms of forestry (30% coverage – the highest in Scotland) and peat both giving the potential to register and sell carbon credits. There would be a loss of peatland habitat and carbon would be released during the commissioning phase where tens of thousands of peat rich habitat would be needlessly excavated.

NPF4 states *“Development should first seek to avoid areas of peatland, carbon-rich soils and priority peatland habitat. Peatland is an important habitat type, supports biodiversity, and is a key carbon store, especially in a climate and nature crises. Improving habitat and hydrological condition and function is a long-term objective as it can take many years to achieve. It is also not possible to guarantee successful restoration, even when following best practice.”*

2.5.2 Holy Loch Nature Reserve (HLNR) and local Nature Conservation Site (LNCS)

In addition, in Chapter 6 of the EIA, (6.8.3) it is noted that the *‘Holy Loch Local Nature Reserve (LNR) and Local Nature Conservation Site (LNCS) is located 1.3 km to the north-east of the Site. Despite the distance between the designated site and the Site Boundary, the LNR and LNCS are connected to the Site hydrologically, via the Little Eachaig River.’*

It is also acknowledged that *‘The Holy Loch LNR/LNCS may be affected by construction works due to a pollution event and/or increased vehicle traffic resulting in silt or dust affecting downstream habitats. However, the LNCS is located approximately 4 km downstream of the Proposed Development at its closest point, with the LNR boundary is further beyond. During a pollution event, any pollutant would be limited and diffuse due to the distance of the LNR/LNCS from the Proposed Development, although any pollution could spread throughout the LNR/LNCS due to tidal action.’*

Apart from the above passing references we do not feel that the critical importance of both the Holy Loch Nature Reserve (LNR) AND/OR the Local Nature Conservation Site (LNCS) has been adequately factored in. Failure to consult with the Reserve’s ecologist, Dr Neil Hammatt, has been noted and brought to the attention of the developer. Details of a large volume of research conducted at the site have neither been referred to, or acknowledged as existing. There are over 2000 species of plant, fungus, lichen and animal living on the surface of the reserve, and in its dozens of ponds, burns and water channels.

2.5.3 Peatslide Assessment

Appendix 8.2 states. *‘There is no evidence of ground or peat instability available from nearby wind farms or local news’*. It should be noted (1) that there are currently no windfarms on the hills in close vicinity of this site and (2) that there was a landslide in Glenkin later in 2014 which resulted in the road leading to residential properties being completely blocked. This is documented in Sandbank Community Council minutes, as well as Tilhill Forestry records (who arranged the contract for repair). The Stronsaul residences in Glenkin are particularly at risk and there is grossly inadequate assessment within the EIA in this regard.

The peatslide assessment characterises one third of the site as ‘likely being a hazard’. Generalised statements therein regarding possible mitigations are not site specific and do not illustrate the intended actions to avoid. There is no reference to the impact on water tables (and hence flood risks) of these proposed excavations and works.

Our concerns align with those detailed objections on this topic submitted by local ecologists Mr Gordon Holm (Consultant Ecologist for Kilmun Community Council) and Dr Neil Hammatt (Holy Loch Nature Reserve). Both note serious concerns about the cumulative hydrological and peatland risk. Overall, we contend that this proposal would not meet the requirements of NPF4, part 3(b) to conserve, restore and enhance biodiversity.

3. OTHER DIRECT IMPACTS ON RESIDENTS AND THEIR PROPERTIES

3.1 Public Health and Amenity

The Giant’s Burn development places residential communities in Dunoon, Sandbank, and Kilmun at direct risk of adverse amenity effects, particularly given the proximity of turbines to homes (the closest at just over 1km, and many more within 2 km) and the scale of vertical infrastructure. The EIA does not apply residential setback guidance or demonstrate that nearby receptors would be protected from noise, shadow flicker, or low-frequency modulation.

The operational noise assessment uses modelled values rather than real-world testing and fails to account for complex upland terrain effects or weather-dependent amplification. No infrasound or amplitude modulation analysis is provided. The approach falls short of ETSU-R-97 and IoA Good Practice Guide (2013) standards, and does not meet NPF4 Policy 32(a) or PAN 1/2011 requirements to assess and manage cumulative public health impacts.

Shadow flicker modelling is incomplete, based on simplistic sunlight assumptions, and fails to consider terrain effects, cumulative sweep exposure, and impacts on east-facing properties in Dunoon. Furthermore, the distinctive concerns posed by the Holy Loch and reflections across to Kilmun and Strone are not included in the assessment in relation to shadow flicker. Furthermore, Gourock is an area that should be assessed as potentially affected by flicker. There are concerns regarding the impact during sunset periods.

Whilst we appreciate that there are some matters are not the subject of specific planning policy provisions, such as BESS fire risk and infrasound, the implications of these gaps for the assessment of this proposal must be noted.

Significantly, the BESS facility presents public health and safety risks far beyond visual or noise impacts. The application includes no fire prevention strategy, no evacuation plan, and no plume modelling in the event of thermal runaway. The site’s upland position and lack of mains water access

make it unsuitable for hosting high-risk infrastructure. No consultation has been undertaken with Scottish Fire and Rescue Service, NHS Highland, or Argyll and Bute's emergency planning unit.

Together, all of these factors pose serious risks to mental and physical health, particularly for vulnerable groups. WHO research (2018) confirms links between chronic noise exposure and stress-related illness.

3.2 Cultural Heritage

The Giant's Burn site lies within a culturally rich landscape containing designated and undesignated archaeological features, historic structures, and key views connected to the Holy Loch, Kilmun, and the wider Cowal peninsula. The upland location forms part of a visual and historical context deeply embedded in local identity.

The turbines would be clearly visible from several Category A and B listed buildings, including heritage features in Dunoon and Kilmun, but no analysis is provided of the effect on setting. Likewise, there is no consideration of skyline breach or the way turbine motion interrupts long-established historic sightlines. This omission is significant given the cultural and military history of the Holy Loch and its role in shaping Cowal's heritage narrative.

Scheduled Monuments are protected under the Ancient Monuments and Archaeological Areas Act 1979 and are scheduled by Historic Environment Scotland on behalf of Scottish Ministers. The preservation of ancient monuments and their settings is a material consideration when determining planning applications. We are very concerned in particular by the change of the setting in which Kilmun Church (Historic Kilmun) has been viewed for centuries.

There are a number of watercourses coming downhill off the proposed site. Some of these converge at the site of the chapel and children's burial ground which is located in a wider site of prehistoric settlement at Ardnadam (**Canmore ID 40746**). The Ardnadam Heritage Trail also follows along the lower parts of this hillside and traverses past the scheduled monuments.

There is no assessment which can be appraised in relation to how (whatever volume of) concrete (an impermeable substance) may impact on risks of flooding in the area below, and directly in the vicinity of these scheduled monuments. We question whether *Scheduled Monument Consent* is required, and/or whether any reference has been made to the Local Area Development Plan (2024) wherein it states:

*'The developer is expected to satisfactorily demonstrate to the planning authority that the effect of a proposed development **on a scheduled monument and its wider setting** has been assessed and that measures will be taken to protect, conserve and where appropriate enhance the special interest of the asset. The use of appropriate setting analysis, design statements, character appraisals and conservation plans are expected to facilitate this assessment.'*

Additionally, the proposal entirely ignores the concept of intangible cultural heritage—including community traditions, oral history, and local landscape relationships—which are especially relevant in rural Argyll and Bute. NPF4 Policy 1(c) places an explicit duty on developments to protect cultural identity and a sense of place. Giant's Burn undermines these values by inserting industrial infrastructure into an iconic and semi-natural setting without due cultural consideration.

3.3. Transport and Access

The EIA proposes a delivery route from Glasgow via A82 and A83, thereafter along the A815 along Loch Eck, passing Benmore Botanic Gardens (within Loch Lomond & Trossachs National Park) to the B836 and proposed site access point. Focusing on the foundations of the turbines alone, a 200 metre turbine requires a colossal amount of concrete for each base, posing an enormous strain on the roads to reach sites.

Despite the volume of concrete alone, modelling described in the EIA suggests an increase of HGV movements of more than 90% on sections of the A815, and 70% on the B836. The data provided in the EIA outlining daily volume of estimated construction traffic movement, as well as the history of major construction projects, would suggest that these figures are grossly underestimated.

In addition, it is unacceptable to state that a Construction Traffic Management Plan would be prepared at some later date: it is essential that this is realistically modelled and detailed as part of the application. The latter should include a detailed list of all major identified pinchpoints, associated risks for landowners as well as the environmental impact of needless destruction of trees, along the currently proposed routes. There is no detail on the multiple issues to be expected regarding use of the A83 despite the agent noting 'roadworks' as part of the rockfall protection'. The statement *'Discussions should be held with Transport Scotland to ascertain the timescales for these works to be removed and develop a management plan for movements, if required'* raises serious concerns about understanding the logistics of transport on the A83. Recorded landslides date back at least to October 2007, when about 400 tonnes of debris blocked the road for over two weeks. It is unlikely that discussions with Transport Scotland will resolve matters in a short timescale!

Finally, there is no mention of how residents along the A815 would manage on a daily basis for the period of construction. Overall, the transport impacts, including significant traffic disruption from Abnormal Indivisible Loads (AILs) and Heavy Goods Vehicles (HGVs), negative impact on the key roads including on emergency vehicles, raise enormous concerns.

3.4. Infrastructure and Risk/BESS

The Giant's Burn Wind Farm proposal consists of an extensive infrastructure package, including seven industrial-scale wind turbines (five at 200 metres, two at 180 metres), a permanent Battery Energy Storage System (BESS) rated at approximately 23 MW, a new 132kV substation, and associated access tracks, cabling, control buildings, crane hardstandings, and construction compounds. A grid connection is required but excluded from this application, to be submitted later under Section 37—a regulatory segmentation that, as noted earlier, undermines a full cumulative impact assessment.

The infrastructure's industrial scale and layout present unacceptable risk across several domains. The 200-metre turbines would dominate the local skyline and fundamentally alter the rural upland landscape west of Dunoon. Their location on elevated ground maximises visibility and exposes surrounding properties, roads, and recreational routes to shadow flicker, noise propagation, and visual overbearing. No adequate setbacks are proposed.

The BESS facility, intended to operate 24/7, introduces significant risk of fire, thermal runaway, explosion, and toxic gas release. The application lacks a Quantitative Risk Assessment (QRA) and provides no design details for containment, emergency response, chemical firewater control, or first responder coordination. This is a serious breach of NPF4 Policy 32, which requires clear evidence that risks to public safety and the environment are minimised and properly mitigated. The absence of this information is unacceptable given the known hazards of lithium-ion energy storage systems and the site's proximity to homes, watercourses, and steep terrain.

The EIA does not specify the battery chemistry, fire suppression systems, spill containment, or emergency protocols. No firewater or chemical runoff containment is described, despite the site's proximity to watercourses, peatland, and steep terrain draining toward Loch Loskin, Ardnadam, Glenkin and populated areas. In the event of a fire or failure, toxic plumes and contaminated runoff could threaten local health, water quality, and biodiversity. This directly conflicts with NPF4 Policy 32 (Pollution and Risk) and LDP ENV 16 on soil and water protection.

Whilst the Scottish Fire and Rescue Services is not a consultee for this application, these risks cannot be ignored. The risks are exacerbated by the limited capacity of local emergency services. Argyll & Bute lacks the specialised equipment needed to handle large-scale lithium battery fires. In the event of a major incident, response would depend on support from specialist fire and rescue units in Glasgow or Edinburgh, both approximately two hours away by road. This delay would severely restrict the ability to effectively contain a fire or mitigate environmental contamination. By the time specialist units reach the site, irreversible ecological and public health damage could have already occurred. Given the lack of detailed planning, the unsuitability of the proposed location, and the absence of regional firefighting capability, including the BESS compound in this application poses a significant and unacceptable risk.

4. CONCLUSIONS AND RECOMMENDATION

Based solely on the applicant's documentation, this objection demonstrates that the Giant's Burn Wind Farm proposal is at odds with the legal, technical, and planning requirements of the Scottish planning system in a large number of areas.

Primary reasons for objection include:

- Improper site selection and design, with no justification for locating turbines and BESS infrastructure in a sensitive upland area adjacent to residential zones and panoramic viewpoints
- Landscape and visual impacts have been under-assessed in the EIA
- The landscape and visual impacts of the proposal will be significantly adverse.
- Excessive landscape and visual harm, including skyline breach and visual domination, contrary to Policies 11(d) and LDP ENV 13/14
- There is no proven need for this proposal. This proposal is not the 'right development in the right place'
- The ornithological and ecological concerns for the proposed site are significant and likely to be adverse; loss of habitats for our iconic raptor species
- Failure to protect biodiversity and carbon-rich peatland
- Incomplete assessment of hydrology, flood risk, and peat disturbance
- Proposed development would undermine and destroy the nationally and internationally recognised national asset that proudly defines our identity: the raw natural beauty of our landscape.
- Proposed scale of the development completely contrary to the Argyll and Bute Landscape Wind Energy Capacity Study 2017 (ABLW17) – a “material consideration” in determining this application
- No significant economic benefits to the local community have been credibly identified; most of those claimed are vague, unsubstantiated, or not relevant to the project locale
- The economic costs to the local communities have been ignored or downplayed
- Unresolved and serious public health hazards from noise, shadow flicker, and low-frequency sound
- High-risk, unregulated BESS component with no fire control or emergency response plan, breaching Policy 32
- Unfeasible and unsafe transport access, bringing dangerous levels of congestion to narrow, winding roads and placing public infrastructure and road safety at risk.
- This proposal appears to be contrary to the criteria set out in NPF 4 Policy 3 and 11 e).

Cumulative impacts arising from all of the considerations above.

These are PROFOUND. Each individual 'impact' of itself is sufficient to undermine the presumptive 'support' for this renewable energy project but, when all are considered cumulatively, it clearly leads to the unquestionable conclusion that while this may be the right sort of project, **it is in completely and totally the wrong place.**

Critically, in relation to the net economic impact, including local and community socio-economic benefits such as employment, associated business and supply chain opportunities we note that in NPF4 Policy 11(c) development proposals will only be supported where they maximise net economic impact. It is a third 'condition precedent' for support that must be satisfied before the balancing exercise of all other factors can be considered by the ECU. We do not believe this has been demonstrated. The developer's socio-economic 'supplementary report' is lacking in site and location specific information and lacks credibility.

The scale of contribution to renewable energy generation targets is **miniscule**. It is dwarfed by what Argyll and Bute is delivering with Cruachan 2's 600MW which is in addition to Cruachan 1's 400MW. Yet the visual impact of the proposed wind farm is disproportionately huge and disruptive compared to the minimal intrusion of Cruachan 2. The pumped storage scheme is the 'right project in the right place'. The proposed wind farm is definitely not."

SAVE COWAL'S HILLS submits that the application for the Giant's Burn Wind Farm must be refused in full.