

Giant's Burn Wind Farm Landscape and Visual Review

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Limitations/ Assumptions

1. *The sole purpose of the report is to inform Argyll & Bute Planning Officers about the potential significant landscape and visual effects of the wind farm proposals.*
2. *The Section 36 Application documents sourced from the Applicant's website have been relied upon and presumed accurate in preparing the report, except where any inaccuracies or differences of opinion have been noted.*
3. *The assessments of likely significance not predicted in the EIAR but included in this report are provisional and based upon limited time and site survey and with further information may be subject to revision.*

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1. Introduction

This review of landscape and visual effects of the proposed wind farm has been undertaken by Argyll and Bute Council's consultant landscape architect, Jacobs. It has been based on examination of the Environmental Impact Assessment Report (EIAR) and in particular the Landscape and Visual Impact Assessment (LVIA) in Chapter 5 accompanying the Section 36 application ECU00005007 submitted on 15 July 2025, a site visit on 25th September 2025 and knowledge of the area surrounding the proposal gained from previous visits.

2. Description of proposals

The proposed wind farm site lies approximately 1.3km northwest of the coastal town of Dunoon and 1km southwest of neighbouring Sandbank. It lies within the *Steep Ridgeland and Mountains* Landscape Character Type overlooking the Firth of Clyde and includes Bishop's Seat (504m AOD), Eilligan (469 AOD) and the craggy Giant's Knowe, with the proposed access track joining the B836 at approximately 30m AOD. The area where the turbines are proposed rises from north to south and there is a significant level difference or circa 100m between the base of the lowest (T7) and highest (T1) turbines. The surrounding area is topographically complex and is characterised by several raised peaks including Tom Odhar (256 m AOD) to the east, and Kilbride Hill (396 m AOD) to the south, reaching 611m AOD at Cruach nan Capull to the north-west. The site is incised by numerous burns that generally drain towards the Little Eachaig River via Glen Kin in the north and Holy Loch to the east of the site boundary.

The main components of the proposal are:

- seven turbines, five of which have a maximum tip height of 200m (T1-4 & 7) and two at 180m high (5 & 6). Three of the turbines (T1, T3, and T7) would have 2000 candela aviation red lights mounted on the hub;
- BESS with a rated power of approximately 23 MW and storage capacity of 53 MWh;
- substation compound (40m x 25m) accommodating a control building for the SSEN substation and the wind farm substation; and
- two construction compounds, approximately 50m x 100m each.

The site would be accessed from the B836 to the north. A total of approximately 6.4km of new track would be created and 3.8km of existing track would be upgraded.

Working of borrow pits is mentioned in the Description of the Proposed Development, but no further description is provided. Technical Appendix 4.1: Scoping Response Table states that no borrow pits are proposed as part of the application.

A 100m micro-siting allowance for all wind farm infrastructure is being sought as part of the consent application and has been assumed in the environmental assessment.

A separate grid connection application would be made by SSEN. The grid connection point for the proposal is subject to confirmation, though it is expected to connect to Dunoon substation.

The proposed wind farm would have an operational lifespan of up to 50 years after which it would be decommissioned or an application submitted to extend the operational period or repower.

EIAR Chapter 12 addresses forestry impacts. A total of 32.94 ha forest would be felled to enable construction and operation of the proposal. Permanent removal of 3.85 ha of forest is required for the proposal. A further 21.68 ha would be felled to restore peatland as part of the BESS and 7.39 ha felled in anticipation of windblow and replanted in situ.

1.08 ha of the woodland to be permanently removed is in the Ancient Woodland Inventory (AWI), although it is now under coniferous plantation.

To comply with the Scottish Government's Control of Woodland Removal Policy the Applicant states they are committed to providing 13.57 ha of compensatory planting and are seeking locations both within and outwith the site. AWI compensatory planting would be with native broadleaved trees.

3. History

There have been several previous wind farm applications at and close to the proposal site. Strone Saul Hill/Eilligan wind farm comprising eight turbines 100m high located on the same site as the current proposal was refused permission based on significant adverse landscape and visual impacts.

Proposals for Corlarach Hill wind farm to the south of the proposal site (14 turbines) and Black Craig wind farm (16 turbines) southwest of the site were both dismissed at Planning Appeal as being inappropriate for the location and damaging to visual amenity and the local economy.

Proposals for Bachan Burn wind farm (2013), approximately 1.6 km to the southeast of the current proposal, were withdrawn; NatureScot had raised significant concerns over landscape impacts at scoping stage. The site has since been investigated by another developer (Allt Mhor, 2019) and NatureScot provided pre-application advice highlighting established landscape concerns and advised that they did not consider this to be an appropriate location for a wind development of this scale.

4. Information submitted by the Applicant

The Landscape and Visual Impact Assessment (LVIA) set out in Chapter 5 of the EIAR appears to accord with the Guidelines for Landscape and Visual Impact Assessment Third Edition and other best practise guidance for wind farm assessment. The LVIA is generally comprehensive, and I agree with most of the findings on the significance of landscape and visual effects, although the significance of effects on views from across the Firth of Clyde is perhaps understated.

The visualisations generally appear to accord with best practice guidance and present an accurate representation of the proposed development. The neighbouring proposed Inverchaolain wind farm at scoping stage is not considered within the cumulative assessment or as part of the baseline scenario, however the wirelines for the proposal also include its turbines. This highlights the potential for cumulative effects, but it is important to remember that the Inverchaolain proposal is not part of the baseline.

A bare-ground ZTV (allowing only for screening provided by landform but not buildings or forestry so representing a worst-case/ maximum visibility scenario) is included in Figure 5.1. However on ZTV Figures 5.2, 5.5, 5.6 and 5.8 using OS data, buildings have been assigned a height of 7m and forest 15m, giving an impression of reduced visibility. As forestry is widespread in the area and felling coups a common feature (e.g. the area seen on the hillside between Dunoon and T2 and T3 for Viewpoint 14), this potentially ZTV under-represents visibility in some locations, particularly as felling will be required to construct the wind farm. For example the two southernmost turbines (T1 and T2) are within areas of existing forestry, yet the ZTV indicates the land under this forestry as being outside the ZTV. This limitation is not declared on the ZTVs.

There appears to be inconsistency in reporting of the areas of forest removal areas between EIAR Chapter 12: Forestry and Technical Appendix 6.5: Biodiversity Enhancement Strategy. Appendix 6.5 notes that there would be a loss of approximately 45.77ha of 'stocked woodland' as a result of the proposal. Chapter 12 states that a total of 32.94 ha forest would be felled.

NatureScot Guidance - Assessing the cumulative landscape and visual impact of onshore wind energy developments states 'An assessment of cumulative impacts associated with a specific development proposal should encompass the *impacts of the proposal in combination with existing development, either built or under construction*. The LVIA considers operational and consented wind farms as part of the baseline and although a cumulative ZTV is included for this scenario on Figure 5.10, these are not assessed separately in the CLVIA.

Despite a large number of popular scenic recreational routes in the study area no sequential assessment of the cumulative impacts on visual amenity for those travelling along such routes has been provided.

Only other wind energy developments are taken into consideration in the cumulative assessment, while other types of development should also be considered where appropriate. GLVIA3 paragraph 7.10 states that 'In some cases, development of another type or types will be relevant and may help to give a more complete picture of the likely significant cumulative effects. NatureScot Scoping Opinion highlights that the overhead line (OHL) upgrade that is going to be implemented in the area and large sections of diseased larch in the area will result in the clear felling of large swathes of woodland and that these two landscape changes will have cumulative impacts but will also open views to the proposal that are not currently available. For those reasons they advised information of these changes is included in the assessment. The applicant's response in the LVIA was that '*Forestry removals are a routine feature of the wider landscape and do not require detailed consideration*.' In my opinion they require detailed consideration when they affect the extent of visibility of the proposal and the potential for significant visual effects from the surrounding areas.

In addition, the extent of alleged 'maximum' theoretical visibility is misrepresented on Figure 5.2 ZTV Study Area and other ZTV Figures (e.g. 5.6 Visual Receptors and 5.10 Cumulative ZTV Study Operational and Consented) where locations of woodland taken from the OS Open Map Local have been excluded from the visibility analysis. 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 inaccurate.

5. Scoping

A turbine layout comprising nine turbines at 200m tip height formed the basis of the EIA Scoping Report submitted to the Scottish Government in February 2024 and public consultation events in April 2024.

Relevant extracts of Argyll and Bute Council's Scoping Opinion are summarised as follows:

Several other proposed wind farms in this locality have been refused.

Uplands, moorlands and forestry provide backdrops and skylines to these coastal locations.

Water based viewpoints should also be considered/included as important receptors in this landscape e.g. water based recreation.

The Strava Heat Map for the area demonstrates that the public visit the hills in the area including Bishop's Seat, Eilligan with some continuing north to Leacann nan Gall and others descending SA37 the Public Right of Way which links Balagown with Inverchaolain. The EIA will need to consider the visual impacts of the proposed wind farm on people using the Public Right of Way, Bishop's Seat and other hills in the immediate area.

NatureScot's Scoping Opinion notes that:

[The site] is located in a highly sensitive and prominent location which may give rise to natural heritage concerns of national interest which could prove difficult to overcome. As such, there is a possibility that we may object to an application for permission to build a wind farm in this location.

This proposal has the potential to result in significant adverse effects on the Loch Lomond and Trossachs National Park which may raise issues of national interest. In addition, the effects could result in a significant and substantial change to the Upper and Inner Clyde Landscape/Seascape. Both of these aspects could lead to a NatureScot objection.

Given the information provided, we consider there is potential for significant and adverse effects on the Special Landscape Qualities (SLQs) as appreciated from Loch Eck, Summits and Hills from the Cowal Peninsula extending toward the Arrochar Alps, and the Coastal Fringes facing the site including Kilmun and Strone Point.

6. Design evolution

The Planning Statement summarise the evolution of the design and mitigation embedded into the design to reduce landscape and visual effects. A turbine layout comprising nine turbines at 200m tip height was submitted for Scoping.

Following an initial round of public consultation and the receipt of the EIA Scoping Opinion the key design changes were:

- reduction from nine to eight turbines;
- two turbines moved into additional land available for development; and
- turbines relocated to reduce impact on landscape and visual receptors including moving turbines away from homes to the northwest to reduce effects on residential visual amenity

Following a second round of public exhibitions, and further assessment, design changes included:

- reduction from eight to seven turbines; and
- tip height of two turbines closest to Dunoon, Sandbank and other visual receptors to the east reduced to 180m to mitigate visual effects and ensure a more even composition in views across the Firth of Clyde.

Other mitigation measures to reduce landscape and visual effects reported within the LVIA include:

- Seeking to avoid, turbine bases being seen in front of the skyline in views from the east, balanced against the need to avoid environmental constraints to the northwest including deep peat.
- Agreement of a reduced aviation lighting scheme with the CAA to minimise the number of lights required to 3 nacelle lights and no mid-tower lights.
- Aviation lights to reduce to 200 candela (from 2000 candela) in good visibility conditions (more than 5 km).

7. Landscape effects

Direct landscape effects would include the removal of small areas of forestry around the locations of turbines T1 and T2; the construction and presence of the wind turbines, tracks and other infrastructure within the open moorland of the site; and the planting and growth of areas of new deciduous shrubs and trees along the forest margin. These changes are not predicted to be significant.

Significant effects on the character of landscapes and seascape are predicted in the EIAR for:

- the host Argyll and Bute Landscape Wind Energy Capacity Study (ABLWECS) Landscape Character Type (LCT) *Steep Ridgeland and Mountains* (LCT1);
- the adjacent LCT4 *Mountain Glens* around Holy Loch, 1.4 km north-east of the turbines (Figure 5.1 indicates theoretical visibility of 5-7 turbines from the majority of this LCT, but on Figure 5.5 this is reduced by forest cover); and
- the adjacent Seascape Character Area 3 *Inner Firth of Clyde*, which extends east along the Clyde from Holy Loch and Dunoon (Figures 5.1 and 5.2 indicate widespread visibility of 5-7 turbines).

The EIAR states that these would result from the presence of the turbines and close views of the turbines such that they are a key feature of the landscape within the upland area south of Glen Lean, *up to 5 km from the turbines*, within Dunoon and Sandbank and areas *up to 4 km from the turbines* across Holy Loch to the north-east, and within the Firth of Clyde *up to 6-7 km from the turbines*.

The *Steep Ridgeland and Mountains* LCT described in the ABLWECS as 'steep-sided, craggy-topped mountains and sharp ridges, deeply cut by the long, narrow sea lochs of Cowal' is illustrated in the visualisation for viewpoints (VP) 03 (Dunoon Castle) and VP07 (Glen Lean) located within it and from VP04 (Strone Pier) within the neighbouring *Mountain Glens* LCT. The *Mountain Glens* LCT is illustrated in the visualisations for VP01 (Lazaretto Point Ardnaman), VP05 (A815 Orchard) and VP06 (Benmore Gardens).

The ABLWECS does not advise any further development of commercial scale wind farms (beyond the operational Cruach Mhor and Clachan Flats wind farms) in the *Steep Ridgeland and Mountains*, stating that landscape and visual sensitivity for turbines > 50m is *high* and there is no scope to additional new development of this scale in this landscape without significant effects occurring.

Of particular significance in relation to the proposal location the ABLWECS states:

'Strategically, the steep and rugged mountainous terrain of Cowal and its intricate pattern of deep sea lochs strongly contrast with the simpler, lower plateau-like uplands of Clyde Muirshiel and with the more developed character of the coastal edge on Inverclyde and North Ayrshire. The introduction of wind farms and larger turbines seen on the skyline of the *Steep Ridgeland and Mountains* or against the most prominent coastal edge and promontories of this character type form the wider Firth of Clyde basin would adversely affect the strong sense of Cowal forming the threshold to the 'Highlands' and the point where the Glasgow conurbation is left (this perception heightened by the ferry crossing to Dunoon). The present contrast of the landscapes of the Cowal with the more developed Inverclyde and North Ayrshire coast would be diminished.'

It is evident in several of the photomontage views (e.g. VP04, VP05, VP14, VP09) that the very large scale of the turbines would diminish the apparent scale and distance of the hills of the *Steep Ridgeland and Mountains* of the Cowal Peninsula and introduce turbines to an area of the view where none are currently visible.

Although covered to some extent in the visual assessment, despite including a heading 'Effects on Landscape/ Townscape Character' and widespread visibility of turbines from Dunoon, Sandbank, Kilmun and Strone, the LVIA does not specifically address the (albeit indirect) effects on the townscape which would result from views of turbines.

8. Landscape designations

Landscape designations are shown along with ZTV mapping on Figure 5.2. Loch Lomond and the Trossachs National Park (LLTNP) is located approximately 2.7 km to the north-east of the proposal site on the north-east shore of Holy Loch and continuing to the north and north-east. The *Bute and South Cowal Local Landscape Area* (LLA) is located 1.7 km to the west of the proposed turbines with the western edge of the proposal site located just within the LLA. .

An assessment of effects on the Special Landscape Qualities of Loch Lomond and the Trossachs National Park (LLTNP) is included in the LVIA and concludes that a number of *relatively minor and localised effects* would arise along the south-west boundary of the LLTNP from Strone (refer to VP04 Strone Pier) to Kilmun and the accessible hillsides above these villages (e.g. VP23 Strone Hill), and extend through the glen at the southern boundary closest to the proposal site and along Loch Eck as far as Dornoch Point (VP08). VP05 (A815, Orchard), VP06 (Benmore Gardens Entrance) and VP22 (Benmore Gardens Hilltop) illustrate visual effects experienced from Strath Eachaig within the National Park. Considered together, these effects are predicted in the EIAR to be not significant.

Whilst the geographic extent of close range visibility of turbines from within the LLTNP is limited, the significance of visual effects is considerable, particularly from the area across Holy Loch including Kilmun and Strone, and the wind farm would have significant effects on views experienced by visitors to the National Park arriving by ferry at Dunoon and Hunter's Quay and travelling north along the A815 coast road. The photomontage for VP24 (Beinn Mhor, the highest peak on the Cowal Peninsula) indicates that all seven turbines would be visible in an area of the view not currently affected by wind farms and at much closer proximity than other visible wind farms, such that it would affect the sense of remoteness and tranquillity experienced. Looking south along Loch Eck (VP08 Dornoch Point) the introduction of turbines to the focal point of the framed view would alter the sense of remoteness and tranquillity currently experienced.

Bute and South Cowal Local Landscape Area (LLA)

The eastern boundary of this LLA lies less than 2km to the west of the proposed turbines, with the LLA extending across the western half of the Cowal Peninsula and around Loch Striven, continuing south to take in much of the Isle of Bute. In the LVIA in the absence of a formal citation the impact of the proposal is considered against the 'scenic value' of the LLA; the 'quality which derives from the visual composition of the landscape' and is judged to be of high susceptibility and high/medium sensitivity. No attempt has been made to identify individual 'special landscape qualities' against which to assess impacts. The LVIA predicts that the effect on the LLA would be not significant, noting that theoretical visibility of turbines shown within the LLA, as shown in Figure 5.2 (i.e. theoretical visibility, which assumes screening to be provided by forestry, rather than bare ground worst-case scenario) would principally arise from '*hill summits and facing slopes within 5-7km to the west and north-west of the proposed turbines*'; from the western end of Glen Lean as illustrated by VP07, and from Beinn Bhreac around 7-8km to the southwest. Visibility of 3-5 turbines would also arise from areas on the Isle of Bute, but as illustrated by VP20 Rothesay, the turbines would be distant and mostly screened by hills. Notably from this location the Inverchaolain turbines (scoping stage) would be much more prominent and likely to result in significant effects.

Permanent, changes to views are predicted to arise over the upland areas within 5km of the turbines, decreasing up to 9km. The area affected by such changes to views would be divided by areas of no visibility due to terrain and forestry and would comprise a limited extent of this LLA, focussed around the northwest boundary. The effects are predicted to be not significant.

West Renfrewshire Hills LLA

The LLA lies across the Firth of Clyde approximately 10km to the southeast of the proposal. One quality of the LLA identified as having the potential to be affected by the proposal is:

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"a panoramic view stretching to the south-west over the Isle of Bute across the length of the Cowal Peninsula northwards to the Holy Loch and the Rosneath Peninsula. The Renfrew Heights and plateau moorlands separating the Clyde and the Ayrshire basin to the south create strong and containing skylines VP18 (Kelly Cut) shows the turbines seen on the skyline of the Cowal Peninsula. Given the westward orientation of the slopes within the LLA, this would affect most of the designated area as illustrated by Figure 5.2 (note the bare ground ZTV in Figure 5.1 extends further, covering an area under forestry, some of which appears to have been felled recently). The turbines would occupy a relatively narrow arc of the available view. Effects are predicted in the EIAR to be not significant, but the turbines would be visible on the skyline of the Cowal peninsula close to the complex rugged terrain to the north, their large size diminishing the apparent scale of the landform and distance.

There are no other wind turbines visible to the west from VP18, although Inverchaolain (at scoping) turbines would also be visible on the skyline, considerably widening the arc over which turbines would be seen and likely resulting in significant cumulative effects.

9. Visual effects

The theoretical visibility of the proposal along with the locations of various landscape and visual receptors are shown on EIAR Figures 5.1 and 5.2. Figure 5.8 includes theoretical visibility of aircraft lighting.

Figure 5.1 indicates that the higher ground to the west and north would restrict visibility in those directions to areas close to the site and some hill summits, including within LLTNP and channelled views along Glen Lean and Loch Eck. To the east and south, visibility would be more widespread across much of Dunoon and Sandbank, across Holy Loch, along the Firth of Clyde to slopes and hill tops around the coastline, the islands of Bute and Great Cumbrae and around Glasgow.

The proposal would introduce large turbines to an area of the skyline where no other turbines are visible and would fundamentally alter the nature of views towards the Cowal Peninsula experienced by large numbers of people living in and visiting the area.

The LVIA predicts **significant** visual effects would arise at the following locations:

Sandbank (VP01 and Illustrative Views A-E in Appendix 5.3)

The bareground ZTV indicates widespread theoretical visibility of all seven turbines from Sandbank. Although buildings and woodland would provide some screening, there would be views of the turbines prominent on the skyline from much of the settlement including the coast. Whilst the focus of views from houses along the coastal fringe tends to be seaward, the turbines would appear high above the forested hills that form the backdrop to the settlement.

Dunoon (VP02 and VP03 and Illustrative Views F-I in Appendix 5.3)

The bareground ZTV indicates widespread theoretical visibility of all seven turbines from Dunoon. Although buildings and woodland would provide some screening, the turbines would be prominent on the skyline in views from much of the settlement including open spaces and the esplanade. Whilst the focus of views from houses along the coastal fringe tends to be seaward, the turbines would appear high above the forested hills that form the backdrop to the settlement. The large scale of the turbines would diminish the apparent scale and distance of the hills.

Kilmun and Strone (Illustrative Views J-K in Appendix 5.3, VP04)

Kilmun and Strone within the LLTNP lie along the A815 coast road overlooking Holy Loch towards the wind farm site. There would be open, close views of all seven turbines prominent on the skyline across the water. The large scale of the turbines would diminish the apparent scale and distance of the hills.

Ferry routes between Gourock and Dunoon/Hunter's Quay (VP03, VP14 and View L in Appendix 5.3)

Ferry travellers on both routes would see close views of the turbines on the skyline above Dunoon and Sandbank throughout their journey.

Recreational water users between Gourock, Kilcreggan and Dunoon and within Holy Loch (VP03, VP09, VP14, VP15, VP16 and Views J-L in Appendix 5.3)

The Firth of Clyde is a popular recreational boating area with various marinas and sailing clubs along its coastline. Figures 5.2 and 5.3 show the widespread visibility of 5-7 turbines across a large area of the Firth of Clyde extending south beyond Cumbrae and east up the Clyde estuary beyond Helensburgh and Greenock.

Local roads and Core Paths between Sandbank and Loch Eck (VP06)

There would be some open views of the turbines from closer routes including the B836, with visibility decreasing further north due to tree cover. VP06 within Benmore GDL within the LLTNP indicates partial visibility with some screening provided by trees.

Users of Core Paths within 2 km (Illustrative View D along High Road in Appendix 5.3)

The core paths (indicated on EIAR Figure 5.6 Visual Receptors) which run through the forested slopes between the proposal and the edge of Sandbank and from where there would be views of the turbines from felled areas.

Other effects assessed in the EIAR as not significant or not assessed

In general I would agree with the identification of the above **significant** effects. However, there would also be widespread impacts on the views across the Firth of Clyde experienced from along the settled coasts of Inverclyde and North Ayrshire (VP13, VP14, VP15, VP16, VP17), with the introduction of wind turbines above the Cowal Peninsula in an area where there is no existing wind farm development. The effect on users of the A815 is predicted to be not significant, despite the close range views experienced by travellers (VP01, VP03, VP05), albeit intermittently. The effect at Strone Hill (VP23) within LLTNP is predicted to be not significant, despite the turbine occupying an area of the available panoramic view which is currently free from wind farms, and the other turbines visible being distant and appearing relatively much smaller in scale. All seven turbines proposal would be fully visible and prominent in the view southwest across the Cowal Peninsula which takes in the distant hills of the Isle of Arran, with 'stacking' of two pairs of turbines.

No separate visual assessment appears to have been undertaken for the A880 which runs through Kilmun and Strone within LLTNP, despite the open close range views across Holy Loch to all seven turbines on the Cowal Peninsula skyline.

Several of Scotland's Great Trails covered by the bareground ZTV in Figure 5.1 (e.g. West Island Way, Ayrshire Coastal Path) have not been shown on Figure 5.6 while the LVIA provides limited justification for the effects identified along those routes and no sequential assessment.

Night-time effects

Figure 5.8 includes theoretical visibility of aircraft lighting.

The coastal settlements around the Firth of Clyde are well lit and there are bright lights at the various port facilities. The area to the west of the site is more rural and typically dark at night. In the LVIA no significant visual effects are predicted to result from the three proposed red aviation lights.

10. Residential visual amenity assessment (RVAA)

The RVAA (Technical Appendix 5.4 of the EIAR) of properties within 2km of the proposed turbines states that 118 homes in the study area would have 'more open' visibility of the turbines from windows and/or garden, with 55 having open views from their garden and main living area windows and requiring detailed assessment. Figure 5.4.1 in Annex B of the Appendix indicates three individual properties (R1 - Glenkin Cottage, R2 - Stronsaul Cottages and R3- Auchenblae) and two groups of properties (G4 - Shore Road and G5 - High Road, Massan View, Lorimer Terrace and Allan Terrace) taken forward to detailed assessment.

The RVAA concludes that residents at High Road, Lorimer Terrace and Massan View would experience Large magnitude effects (illustrative view D from High Road in Appendix 5.3 Illustrative Views), but that the most visible turbines would be set back beyond the skyline and a combination of distance and this partial screening would be sufficient that they would not be experienced as overwhelming or overbearing and the RVA threshold would not be exceeded.

It is notable that residents of numerous properties in Dunoon and Sandbank close to the proposal but outside the 2km RVAA study area would experience significant adverse visual effects as can be seen in the illustrative views in Appendix 5.3 and VP01, VP02 and VP03.

11. Cumulative effects

The cumulative landscape and visual assessment (CLVIA) considers wind farms at planning application stage in terms of:

- Additional effects that would arise from the addition of the proposal to a baseline which includes the cumulative development(s) being considered
- Combined effects that would arise from the addition of both the proposal and the cumulative development(s) being considered to the main assessment baseline

Operational wind farms within 30km of the proposal of particular relevance to the proposal are:

- Cruach Mhor (35 turbines, approximately 11km northwest of the proposal, also located within the *Steep Ridgeland and Mountains LCT*)
- Inverclyde (eight 110m high turbines approximately 13km SW of the proposal site)

There is an operational wind farm at Cruach Mhor, approximately 11km to the north-west of the site, though this is not generally visible from lower lying areas to the east which would have visibility of the proposal. Inverclyde Wind Farm, approximately 13km to the south-east of the proposal site, is more visible from areas with visibility towards the proposal (e.g. Kilcreggan- VP09, Helensburgh – VP12) and more noticeable than the nearby cluster of turbines at High Mathernock and Priestsides. From both VPs the proposal would introduce turbines to a broad area of the skyline where no wind farms are currently visible, and the Inverchaolain proposal (at scoping) would potentially further increase cumulative effects.

NatureScot Guidance¹ recommends that existing wind farms are included in the CLVIA as the combined effect of more than one may be much greater than the sum of the individual impacts. The LVIA considers operational and consented wind farms as part of the baseline and although a cumulative ZTV is included for this scenario on Figure 5.10, these are not assessed separately in the CLVIA. Rather the LVIA suggests that the presence of the Inverclyde turbines would reduce the significance of effects e.g. in paragraph 5.10.12: *'Beyond approximately 15 km from the turbines, visual changes reduce to Negligible as the Proposed Development is less frequently wholly visible and/or would be seen in the context of other wind farms – particularly along the Clyde to the east where Inverclyde wind farm is typically visible from the north bank'*, 5.10.30: *'...changes to character would be Negligible as a result of existing closer views of Inverclyde Wind Farm....'* and Table 5.6 Effects on SLQs and LLTNP: *'The more accessible areas of LLTNP closer to the Site mostly already have views out across the water towards the settlements, ports and Inverclyde Wind Farm on the south side of the firth...'*

There are three other operational wind farms in the 30km cumulative assessment study area:

- High Matherstock & Priestsides (three turbines approximately 19km away)
- Kelburn Estate/ Millour Hill/ Dalry (28 turbines approximately 25km away)
- A' Cruach (21 turbines in two groups of 7 and 14, approximately 28km away)

The separation/ scale of these proposed wind farms from the site and pattern of existing and consented development is such that the cumulative effects of the proposal in with these wind farms is unlikely to be significant.

There are three wind farms at planning application stage within 30km at Vale of Leven (29 km away), Eredine (29 km away) and Crosbie (25 km away). The separation of these proposed wind farms from the site and

¹ <https://www.nature.scot/doc/guidance-assessing-cumulative-landscape-and-visual-impact-onshore-wind-energy-developments#Which+wind+farms+to+include+in+the+assessment?>

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pattern of existing and consented development is such that the cumulative effects of the proposal in with these wind farms is unlikely to be significant.

Inverchaolain Wind Farm is at the scoping stage and proposed a short distance to the southeast of the proposal. Although the wirelines in VP01-24 include this wind farm proposal (likely significant) cumulative effects of the proposal with this potential development have not been considered in the assessment.

The EIAR predicts that there would be no significant cumulative effects.

12. Conclusions

This proposal would have **significant** effects on landscape/ seascape character including:

- the host ABLWECS *Steep Ridgeland and Mountains* LCT which extends to the Firth of Clyde Coast and includes Dunoon;
- the adjacent *Mountain Glens around Holy Loch* LCT, 1.4 km north-east of the turbines wraps around the head of Holy Loch, extends north into LLTNP toward Loch Eck and includes the settlements of Sandbank, Kilmun and Strone; and
- the *Inner Firth of Clyde* Seascape Character Area, which extends east along the Clyde from Holy Loch and Dunoon.

There would also be **significant** effects on views from locations within the above areas, notably the settlements of Dunoon, Sandbank, Kilmun and Strone and from ferries and recreational craft in the Firth of Clyde.

The site is close to the LLTNP. Whilst the LVIA states that effects on its SLQs would not be significant it records significant adverse visual effects for locations within the park including the waterside villages of Kilmun and Strone, both of which enjoy open views across Holy Loch to the Cowal Peninsula, uninterrupted by existing or consented windfarm developments. The LVIA includes an assessment of the effects of the proposal on the SLQs of LLTNP, but considers the existing Inverclyde Wind Farm to reduce the sensitivity of the receiving landscape to the proposal rather than adding to its cumulative effects, stating '*The more accessible areas of LLTNP closer to the Site mostly already have views out across the water towards the settlements, ports and Inverclyde Wind Farm on the south side of the firth.*'

The LVIA states that the proposal performs well against three of four design criteria set out for the host landscape type in the ABLWECS. However, importantly ABLWECS states that 'The introduction of wind farms and larger turbines seen on the skyline of the *Steep Ridgeland and Mountains* would adversely affect the strong sense of Cowal forming the threshold to the 'Highlands' and the point where the Glasgow conurbation is left (this perception heightened by the ferry crossing to Dunoon). The present contrast of the landscapes of the Cowal with the more developed Inverclyde and North Ayrshire coast would be diminished.'

Significant visual effects are predicted in the LVIA for:

- Sandbank (VP01 and Illustrative Views A-E in Appendix 5.3)
- Dunoon (VP02 and VP03 and Illustrative Views F-I in Appendix 5.3)
- Kilmun and Strone (Illustrative Views J-K in Appendix 5.3, VP04)
- Ferry routes between Gourock and Dunoon/Hunter's Quay (VP03, VP14 and View L in Appendix 5.3)
- Recreational water users between Gourock, Kilcreggan and Dunoon and within Holy Loch (VP03, VP09, VP14, VP15, VP16 and Views J-L in Appendix 5.3)
- Local roads and Core Paths between Sandbank and Loch Eck (VP06)
- Users of Core Paths within 2km (Illustrative View D along High Road in Appendix 5.3)

The LVIA does not predict significant effects on views from the Inverclyde and North Ayrshire coastline despite open visibility to the proposal on the skyline of the Cowal Peninsula across the Firth of Clyde, and the absence of other wind farm developments visible from these locations. The visual assessment predicts that visual effects experienced from the A815 which follows the coast around Dunoon and Sandbank would be not significant, despite clear close views to turbines. Although the visual effects on residents of and visitors to Kilmun and Strone are assessed, the effect on travellers on the A880 along the coast within the LLTNP with open views across Holy Loch to the proposal are not assessed.

Three of the proposed turbines would have aviation lights at hub height, however the night-time visual effects are predicted to be not significant in the context of other artificial light sources.

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From a review of the photomontages the layout design of the proposed wind farm appears to have been carefully considered, with limited 'stacking' of turbines and balanced overall composition, such that removal or relocation of the proposed turbines are unlikely to reduce impacts. The scale of the turbines is such that they tend to diminish the apparent scale and distance of the hills when seen from across Holy Loch and the Firth of Clyde to the east and southeast.

Review against NPF4 Policies 4 and 11

Policy 4 c) states that development proposals that will affect a National Park *will only be supported where:*

- i. The objectives of designation and the overall integrity of the areas 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.*

The EIAR predicts effects on the LLTNP's Special Landscape Qualities to be not significant. I have some concerns over the significant visual effects that would be experienced from accessible areas within the designation including along Loch Eck, at Kilmun, and Strone (including Strone Hill). I also consider that the experience of approaching the National Park via the Firth of Clyde and the A815 would be compromised by the proposal. However I have not undertaken a detailed review to assess whether the overall integrity of the National Park might be compromised. I would expect such an assessment to be undertaken by NatureScot or the National Park Authority.

Policy 4 d) states that development proposals that affect a site designated as a local landscape area in the LDP will only be supported where:

- i. Development will not have significant adverse effects on the integrity of the area or the qualities for which it has been identified; or*
- ii. Any significant adverse effects on the integrity of the area are clearly outweighed by social, environmental or economic benefits of at least local importance.*

Despite its close proximity, the proposal is not predicted to have a significant effect on the *Bute and Cowal* LLA. Visibility from the LLA to turbines would be limited mainly to areas of high ground to the west of and sloping towards the site and on the Isle of Bute in excess of 12km to the south-southwest. I do not consider it likely that the effects on views from the Isle of Bute would be such that the integrity of the LLA would be significantly affected. The two visualisations within the LLA are from Rothesay on Bute (VP20) and Glen Lean (VP07). Based on these alone it seems unlikely that the integrity of the LLA would be significantly affected. However, without further visualisations from more elevated locations to the west of the proposal and consideration of effects on key landscape qualities it is difficult to assess the significance of the effects on this LLA.

The *West Renfrewshire Hills* LLA lies across the Firth of Clyde approximately 10km to the southeast of the proposal. One quality of the LLA identified as having the potential to be affected by the proposal is:

"a panoramic view stretching to the south-west over the Isle of Bute across the length of the Cowal Peninsula northwards to the Holy Loch and the Rosneath Peninsula. The Renfrew Heights and plateau moorlands separating the Clyde and the Ayrshire basin to the south create strong and containing skylines" '

VP18 (Kelly Cut) shows the turbines seen in the skyline of the Cowal Peninsula. Given the westward orientation of the slopes within the LLA, this would affect most of the designated area as illustrated by Figure 5.2 (note the bare ground ZTV in Figure 5.1 extends further, covering an area under forestry, some of which appears to have been felled recently). The turbines would occupy a relatively narrow arc of the available view. Effects are predicted in the EIAR to be not significant, but the turbines would be seen on the skyline of the Cowal peninsula close to the complex rugged terrain to the north, their large size diminishing the apparent scale of the landform and distance. It could be argued that the effect on this view is significant, however,

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further visualisations would be necessary to inform an assessment of whether the integrity of the designation is compromised.

Policy 11e requires project design and mitigation to demonstrate how impacts on communities and significant landscape and visual impacts are addressed. In terms of significant landscape and visual impacts, 11e ii states that such impacts are to be expected for some forms of renewable energy and where impacts are localised and/or appropriate design mitigation has been applied, they will generally be considered acceptable. NPF4 provides no guidance on the definition of what constitutes *localised* effects.

Chapter 2 – Site Description and Design Evolution summarises the evolution of the design and mitigation embedded into the design to reduce landscape and visual effects. A turbine layout comprising nine turbines at 200m tip height was submitted for Scoping. Following public consultation and the receipt of the EIA Scoping Opinion design changes included a reduction in the number of turbines from nine to seven, relocations of turbines and of substation and construction compound to reduce impact on landscape and visual receptors, moving turbines away from homes, and reducing tip height of the two turbines closest to Dunoon and Sandbank to mitigate visual effects. Other mitigation measures to reduce landscape and visual effects reported within the LVIA include seeking to avoid, turbine bases being seen in front of the skyline in views from the east (although some turbine bases would remain visible), a reduced aviation lighting scheme to minimise the number of lights and aviation lights to reduce to 200 candela (from 2000 candela) in good visibility.

Although the above design/mitigation measures may be considered *appropriate* and may have reduced landscape and visual effects to some extent, **significant** effects remain for large numbers of receptors. **Significant** visual impacts of the proposals would be experienced by large numbers of people in Dunoon, Sandbank, Kilmun, Strone and on and across the Firth of Clyde which I would consider to be a more than *localised* area. The proposal would introduce visually prominent wind farm development to a widely visible area of the landscape that has none, significantly altering the way the landscape would be perceived.

Review against Argyll and Bute LDP2 Policies 30 (The Sustainable Growth of Renewables) and 71 (Development Impact on Local Landscape Areas)

Policy 30 states that *The Council will support renewable energy developments where these are consistent with the principles of sustainable development and it can be adequately demonstrated that there would be no unacceptable environmental effects, whether individual or cumulative, on local communities, natural and historic environments, landscape character and visual amenity, and that the proposals would be compatible with adjacent land uses...* All applications for wind farms will be assessed against, among other things, impacts on communities and individual dwellings, including visual impact and residential amenity and landscape and visual impact.

Significant visual impacts would be experienced from large numbers of properties in Sandbank, Dunoon, Kilmun and Strone and **significant** landscape and visual effects would occur over a wide area. Although the RVAA does not predict any overwhelming or overbearing effects at residential properties, it is notable that it predicts that 118 homes in the study area would have 'more open' visibility of the turbines from windows and/or garden and that residents of numerous properties in Dunoon and Sandbank outside the 2km RVAA study area would experience **significant** adverse visual effects. **Significant** effects are predicted for the *Ridgeland and Mountains LCT*, the adjacent *Mountain Glens around Holy Loch LCT* and Seascape Character Area 3 *Inner Firth of Clyde*, as well as on ferry routes and recreational water users in the Firth of Clyde and local roads and core paths.

Although the acceptability or otherwise of the proposal needs to take account of a range of other factors in addition to landscape and visual considerations, I would expect the latter to carry considerable weight in the council's overall judgment.

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Policy 71 states that the council *will resist development in, or affecting, a Local Landscape Area where its scale, location or design will have a significant adverse impact on the character of the landscape.*

All development proposals in or affecting a Local Landscape Area must demonstrate that:

- a) Any significant adverse effects on the landscape quality for which the area has been designated are clearly outweighed by social, economic or environmental benefits of community wide importance;*
- b) The proposal is supported by a landscape and visual impact assessment and has taken account of the content of any relevant Argyll and Bute Landscape Capacity Assessment....*

The *Bute and South Cowal* LLA lies less than 2km to the west of the proposed turbines, however the LVIA predicts that landscape effects on the LLA would be not significant. Based on the visualisations from Rothesay on Bute (VP20) and Glen Lean (VP07) it seems unlikely that the character of the LLA would be significantly affected. However, without further visualisations from more elevated locations to the west of the proposal and consideration of effects on key landscape qualities it is difficult to assess the significance of the effects on this LLA. It is also notable that the ZTV (Figure 5.2) gives forestry areas an assumed height of 15m, which given that most areas are commercial conifer plantations subject to periodic felling, may lead to under-representation of the visibility of the wind turbines from within the LLA.

The proposal is accompanied by an LVIA which identifies widespread significant effects even with mitigation in place, so I would question whether it 'supports' the proposal. The LVIA has considered the content of the ABLWECS and argues that the wind farm design 'performs well against three of the four design criteria set out for the host landscape type in the ABLWECS'. However, the ABLWECS does not advise any further development of commercial scale wind in the *Steep Ridgeland and Mountains*, stating that landscape and visual sensitivity for turbines > 50m is *high* and there is no scope to additional new development of this scale in this landscape without significant effects occurring. It also states that 'The introduction of wind farms and larger turbines seen on the skyline of the *Steep Ridgeland and Mountains* or against the most prominent coastal edge and promontories of this character type form the wider Firth of Clyde basin would adversely affect the strong sense of Cowal forming the threshold to the 'Highlands' and the point where the Glasgow conurbation is left (this perception heightened by the ferry crossing to Dunoon). The present contrast of the landscapes of the Cowal with the more developed Inverclyde and North Ayrshire coast would be diminished.'

13. Key viewpoints to be considered by the Planning Committee

VP01 - Lazaretto Point, Ardnadam

Illustrative View A – Cromlech Road, Sandbank

Illustrative View D – Sandbank High Road

VP02 - Dunoon, Ardenslate Road

VP03 - Dunoon Castle

Illustrative View I – Dixon Street, Dunoon

VP04 - Strone Pier

VP23 - Strone Hill

Illustrative View J – Kilmun, Graham's Point

VP08 - Dornoch Point [Loch Eck, within LLTNP]

Illustrative View L – Gourock – Sandbank [Hunter's Quay] Ferry

VP14 - McInroy's Point, Gourock

VP18 - Kelly Cut