



Argyll and Bute Local Development Plan: Supplementary Guidance 2 Representation Form

We would like your views on the Draft Supplementary Guidance 2 and/or the relevant parts of the accompanying Environmental Report.

This form should be used for **all** representations. The Planning Authority **will only accept** responses using this form. On line and electronic versions are available at www.argyll-bute.gov.uk/ldp.

Please use a separate form for each individual aspect of the Proposed Supplementary Guidance or Environmental Report you wish to comment on.

Your representation must be received by **25th March 2016 before 5 p.m.**

Please return the form to:-

On line: Submitted directly using submit button

Electronic copy: **e-mail to ldp@argyll-bute.gov.uk**

Hard copy: Post to Development Policy Team, Argyll and Bute Council, Manse Brae Offices, Lochgilphead, PA31 8RD

1 Please give us your contact details.

Please note that representations cannot be treated confidentially and will be scanned and made available for public inspection, except any information which would be subject to the Data Protection Act 1998. **Only representations that include a name and a method of contact will be validated.**

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(if applicable)

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This helps us reduce costs and improve efficiency

Agent : N/A

If you provide an Agent's name the Council will direct all subsequent correspondence to your Agent.

Agent Address: N/A

Agent Telephone: N/A

Agent E Mail: N/A

Office use only

| Rec | Valid | Cusref | Code1 | Code2 | Code3 |
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Argyll and Bute Local Development Plan: Supplementary Guidance 2 Representation Form

Please use a **separate** form for **each** issue/site/aspect

**2 Please indicate which document you are making a representation on:
Tick one box only**

| | |
|------------------------------|-------------------------------------|
| Draft Supplementary Guidance | <input checked="" type="checkbox"/> |
| Environmental Report | <input type="checkbox"/> |

**3 Please tell us which part of the above document you wish to make a representation on.
Fill in all that apply**

| | | | | | |
|------------------|-------------------------|---------------|-------------------------|-----------------|--|
| Page No(s) | | Chapter No(s) | | Paragraph No(s) | |
| Policy Reference | Renewable Energy | Policy Title | Renewable Energy | | |

**4 Please indicate whether your representation is in support of the document or whether you would wish to see it changed (i.e. your representation is an objection)
Tick one box only**

| | |
|--------------------|---|
| Support as written | Seek a change/Objection Capacity Study X |
|--------------------|---|

5a Please provide your reasons for supporting or objecting to the matter you have highlighted.

The following comments relate to the **Renewable Energy** section of the Supplementary Guidance.

They are submitted on behalf of the Mountaineering Council of Scotland's (MCofS) nearly 13,000 members and the 75,000 members of the British Mountaineering Council for whom the MCofS acts on Scottish landscape and planning matters.

The MCofS recognises that Argyll & Bute Council policy and guidance must comply with the Scottish Government's NPF3 and SPP2014, and that the Council has little local discretion. Bearing this constraint in mind, the MCofS supports the Renewable Energy Supplementary Guidance. We believe that it strikes the right balance between developing low-carbon energy and local environmental and other considerations.

The *Argyll and Bute Landscape Wind Energy Capacity Study* is an important and objective assessment of the capacity of different landscapes within Argyll & Bute and we support the references to it in the Supplementary Guidance. It provides a useful neutral counterbalance to developer-commissioned Environmental Statements that tend to offer assessments sympathetic to the interests of their funders.

We do, however, have some reservations about the conclusions of the *Capacity Study's* cumulative impact assessments shown in Figures 2 and 3 on pages 73 and 74. This appears to be based on a pattern that favours extensive spread of wind farms each separated by a few kilometres from other wind farms. It is our experience that this leads to very large areas being perceived as 'developed' or 'non-natural' landscapes. For example, south Kintyre seen from the Arran hills is characterised by repeated separate clusters of turbines. It is arguable that creating a wide-reaching visual envelope where turbines are characteristic is less desirable than a pattern of highly intensive development of equal total capacity within a more limited total envelope. Thus it might be argued that infilling (intensification) in South Kintyre would be more desirable than supporting the spread of development to presently turbine-free areas.

The inclusion of Map Appendix 2a provides useful additional guidance to prospective developers regarding areas where there are important local economic and environmental interests to be taken into account.

Para 5.13 is incorrect to state that hydro is the largest single source of renewable energy and makes up 50% of installed capacity. Wind is several times larger both in capacity (c. 3 times) and output (c. 2 times).

5b Please indicate the changes that would be required for you to remove your objection

We suggest that infilling (intensification) of wind farm development in South Kintyre is more desirable than supporting the spread of development to presently turbine-free areas.

Para 5.13 is incorrect to state that hydro is the largest single source of renewable energy and makes up 50% of installed capacity. Wind is several times larger both in capacity (c. 3 times) and output (c. 2 times).

Part 5 Notes: Your response in part 5 should be no more than 2,000 words. Please use continuation page(s) as necessary and attach securely to this form. If you intend to attach any supporting documentation, please provide a summary of your representation using this form, which should not exceed 2,000 words