



Shepherds Rig Wind Farm

Section 36 Application

Planning Statement

June 2026

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1. Introduction

1.1 Background

- 1.1.1 This Planning Statement has been prepared by David Bell Planning Limited on behalf of SETT Wind Development Limited ('the Applicant') to support an application under Section 36C of the Electricity Act 1989 ('1989 Act').
- 1.1.2 In August 2023, the Scottish Ministers granted consent under Section 36 of the 1989 Act and deemed planning permission under Section 57(2) of the Town and Country Planning Act 1997 ('the 1997 Act') for the construction and operation of Shepherds Rig Wind Farm (hereafter referred to as the 'Consented Development'). This Section 36C application seeks to vary the Section 36 consent and deemed planning permission previously granted by Scottish Ministers (hereafter referred to as the 'Proposed Varied Development').

1.2 Planning History

- 1.2.1 The original Scoping Report for the Consented Development was submitted to the Energy Consents Unit ('ECU') in 2013, seeking a Scoping Opinion on a layout of up to 45 turbines with a tip height of 149.5 m. Constraints analysis and layout design work continued to ensure the scheme was both environmentally sensitive and economically viable until the project was put on hold in 2015.
- 1.2.2 An updated Scoping Report for the Consented Development was submitted to the ECU in 2018 following a review of economic viability and the recommencement of environmental survey work. This included a layout of up to 30 turbines with a tip height of 149.5 m. Further modelling exercises during the design iteration process led to the Applicant submitting an EIA Report in November 2018 in support of a Section 36 Application to seek consent for a 19 turbine development: 17 turbines at a height of 149.9 m to tip, and 2 turbines at 125 m to tip.
- 1.2.3 Upon receipt of the consultation responses to the Section 36 application for the 19 turbine layout, the Applicant undertook further design and assessment work, amending the layout to 17 turbines (15 turbines with a maximum blade tip height of 149.9 m and two turbines with a maximum blade tip height of 125 m) as presented within an Additional Environmental Information ('AEI I') report submitted in October 2019. Dumfries and Galloway Council ('DGC') objected to the Consented Development upon landscape and visual grounds, triggering a Public Inquiry, where the Applicant prepared a further Additional Environmental Information ('AEI II') report (March 2021).
- 1.2.4 The Consented Development was granted Section 36 consent and deemed planning permission by Scottish Ministers in August 2023 following the Public Inquiry.

1.3 The Applicant

- 1.3.1 The original Section 36 Application for Shepherds' Rig Wind Farm (the Consented Development) was submitted by Infinergy on behalf of the applicant SETT Wind Development Limited, a company formed by Infinergy Limited and Boralex limited liability partnership (LLP). In July 2022, Boralex acquired 100% of Infinergy's interests in the UK.
- 1.3.2 The Applicant remains the same as before, SETT Wind Development Limited. Boralex Limited is the UK branch of Boralex Inc, a Canadian power provider. Boralex has been providing affordable renewable energy for over 30 years as a developer, builder, owner and operator of hydro, onshore wind, solar photovoltaic (PV) and battery storage. A leader in the Canadian and French market, the company is also active in the United States and the United Kingdom.

- 1.3.3 Over the past five years, Boralex's installed capacity has more than doubled to over 3 gigawatts ('GW'). The development portfolio comprises over 6 GW in wind, solar projects and storage projects. Further information can be found at www.boralex.com.

1.4 The Statutory Framework

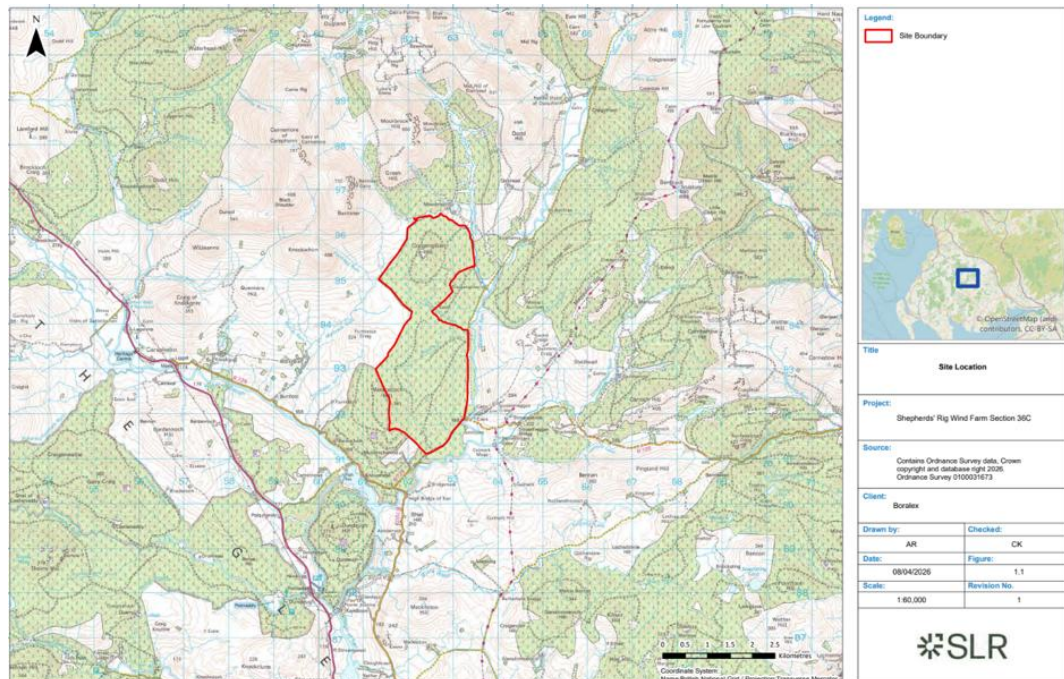
- 1.4.1 Section 36 of the 1989 Act applies to proposals for the construction, extension or operation of an onshore electricity generating station whose capacity exceeds 50 megawatts ('MW'). On granting consent under section 36, Scottish Ministers may also direct under section 57 of the Town and Country Planning (Scotland) Act 1997 that planning permission is deemed to be granted for the development necessary to construct the generating station and any ancillary development.
- 1.4.2 Section 20 of the Growth and Infrastructure Act 2013 inserted a new section 36C into the 1989 Act to provide for the making of variations to section 36 consents.
- 1.4.3 Section 21 of the Growth and Infrastructure Act 2013 amended section 57 of the Town and Country Planning (Scotland) Act 1997 to provide that Scottish Ministers, on varying a Section 36 consent, may give either a direction for planning permission to be deemed to be granted, or a direction for an existing planning permission (or the conditions to which that planning permission was made subject) to be varied as specified in the direction.
- 1.4.4 The Electricity Generating Stations (Applications for Variation of Consent) (Scotland) Regulations 2013 ('the 2013 Regulations') make provision for the content of a variation application and the consultation process to be followed with respect to section 36C applications. The regulations also provide that the Scottish Ministers may cause a Public Local Inquiry to be held if they consider it appropriate to do so.
- 1.4.5 The Electricity Works (Environmental Impact Assessment) (Scotland) Regulations 2017 (as amended) ('the EIA Regulations') apply to variation applications under section 36C as they apply to applications for Section 36 consent.
- 1.4.6 There are certain environmental duties in relation to preservation of amenity and fisheries provisions in Schedule 9, paragraph 3 that apply to the Scottish Ministers as decision maker.
- 1.4.7 The Applicant does not hold a generation licence or exemption under the 1989 Act and therefore the statutory duties set out in paragraph 3(1) of Schedule 9 to the 1989 Act do not apply. The Applicant has however, through the EIA process, had full regard to the matters set out in paragraph 3(1)(a) of Schedule 9.
- 1.4.8 As per the EIA Regulations, the further assessment required to inform the Section 36C Application has considered the impacts of the Proposed Varied Development and how those impacts differ from those previously identified for the Consented Development.
- 1.4.9 The likely significant effects of the Proposed Varied Development (as a whole) are identified, described, and assessed in the EIA Report. The EIA Report then considers the impacts of the proposed variations and how those impacts differ from those previously identified for the Consented Development.
- 1.4.10 Each EIA Report chapter includes assessment of the likely significant effects and also, where appropriate, the identification of appropriate mitigation. This includes both embedded mitigation which is integral to the design, construction and operation of the Proposed Varied Development and also additional specific measures which have been identified.
- 1.4.11 In accordance with paragraph 3(2) of Schedule 9 to the 1989 Act, the Scottish Ministers are obliged to have regard to the desirability of the matters mentioned in paragraph 3(1)(a). The Applicant has provided sufficient information to enable the Scottish Ministers to address their duties under sub-paragraph 3(1)(a) of Schedule 9 to the 1989 Act. The duty on the Ministers is to have regard to the matters specified in Schedule 9 which is not a development management test.
- 1.4.12 In considering the overall statutory and regulatory framework within which the Proposed Varied Development should be assessed, the statutory Development Plan is a material consideration

which should be taken into account in the round with all other relevant material considerations. It is important to note, however, that Section 25 of the 1997 Act is not engaged as there is no 'primacy' of the Development Plan in determining an application made under the 1989 Act.

1.5 Site Location and Description

- 1.5.1 The site of the Proposed Varied Development remains the same as that of the Consented Development. It is located approximately 5 km to the east of Carsphairn and 10 km north of St John's Town of Dalry, in northern Dumfries and Galloway. The Site Location is illustrated in Figure 1.1 of the EIA Report and reproduced below at **Figure 1.1**.
- 1.5.2 The site lies approximately 2 km to the north of the Glenken valley, which contains a sequence of lochs and associated hydro schemes and is adjacent to the upper valley of the Water of Ken which lies close-by to the east. The site lies approximately 3 km to the south-east of the summit of Cairnsmore of Carsphairn. The site covers an area of approximately 752 hectares ('ha') and is centred on approximate national grid reference (easting) 262319 and (northing) 593591.
- 1.5.3 The site comprises commercial coniferous woodland plantation and is bounded to the north and north-east by further forestry and to the west, east and south-east by open moorland. The majority of the site comprises smooth rolling topography, with the exceptions of Cragengillan Hill located in the north of the site (401 m Above Ordnance Datum ('AOD')) and Marscalloch Hill situated on the south-western boundary (381 m AOD). The Southern Upland Way passes to the east of the site.
- 1.5.4 The Scheduled Monument Craigengillan Cairn is located within the north-eastern part of the site, and Stroanfreggan Craig Fort is located approximately 300 m from the south-east boundary of the site.
- 1.5.5 The nearest statutory ecological designation is the Cleugh Site of Special Scientific Interest ('SSSI'), which lies approximately 4 km to the south and is designated for its unimproved lowland neutral grassland. Dundough Wood, to the south of the site, is listed in the Ancient Woodland Inventory.
- 1.5.6 The site is not located within or near a national landscape designation, with the nearest, the Fleet Valley National Scenic Area, lying approximately 25 km to the south. The Galloway Hills Regional Scenic Area ('RSA') lies immediately to the west of the site and a small part of the western edge of the site lies within the RSA.

Figure 1.1: Site Location



1.6 Overview of the Proposed Variations

1.6.1 Chapter 4 of the EIA Report contains a detailed description of the Proposed Varied Development.

1.6.2 As set out above, the Applicant gained Section 36 and deemed planning permission from Scottish Ministers in August 2023 to construct and operate the Consented Development. The Consented Development comprises 17 turbines (15 turbines with a maximum blade tip height of 149.9 m and two turbines with a maximum blade tip height of 125 m) and associated infrastructure.

1.6.3 The proposed variations include:

- > Removal of six turbines and associated crane hard standings;
- > Increase in the maximum blade tip height of the remaining 11 turbines to 220 m;
- > Increase in size of associated crane hardstandings to accommodate the larger turbines;
- > Relocation of eight turbines beyond the micro-siting allowance of the Consented Development, but within the same pattern of development;
- > Amendments to part of the track layout to reflect turbine removal and relocation (as outlined above);
- > Change to the number and location of required watercourse crossings to accommodate the amended track layout;
- > Increase in size and capacity of the associated Battery Energy Storage System ('BESS');
- > Relocation of the temporary construction compound slightly beyond micro-siting allowance;
- > Removal of the previously proposed permanent anemometer mast; and
- > Increase to the period of consent from 30 to 40 years.

- 1.6.4 The Proposed Varied Development is illustrated in **Figure 4.1** of the EIA Report.
- 1.6.5 Collectively, the proposed variations listed above are referred to as the 'Proposed Varied Development'. The key element of the variation is that the locations of three of the proposed turbines are within micro-siting allowance for the Consented Development, whilst a further four remain broadly within the same location but beyond the micro-siting allowance. The remaining four turbine's locations have been adjusted to incorporate on-site constraints and the larger turbine infrastructure and remain within a similar pattern of development to the Consented Development.
- 1.6.6 A comparison of the Proposed Varied Development's layout to that of the Consented Development is outlined in detail within **Chapter 4: Description of the Proposed Varied Development** of the EIA Report and the difference in turbine locations illustrated on **Figure 4.2** of the EIA Report. The site boundary of the Proposed Varied Development remains the same as the Consented Development.
- 1.6.7 Based on the candidate turbine model, the Proposed Varied Development is expected to have an indicative installed maximum wind energy generating capacity of 77 MW compared to 70.2 MW for the Consented Development. The Proposed Varied Development's BESS maximum storage capacity is 50 MW compared to 6 MW for the Consented Development.
- 1.6.8 The Applicant has calculated that the energy yield of the Consented Development can be increased by approximately 53% by increasing the height of the proposed turbines. This increase in turbine height, together with the reduction in turbine numbers, would only result in limited changes to environmental effects (as outlined within technical **Chapters 7-18** of the EIA Report and further referred to below in the context of the policy framework). These primary factors have encouraged the Applicant to undertake a variation to the Consented Development.
- 1.6.9 The increased yield would enable the Proposed Varied Development to make an even greater contribution to UK and Scottish Government climate change and renewable energy targets and commitments.

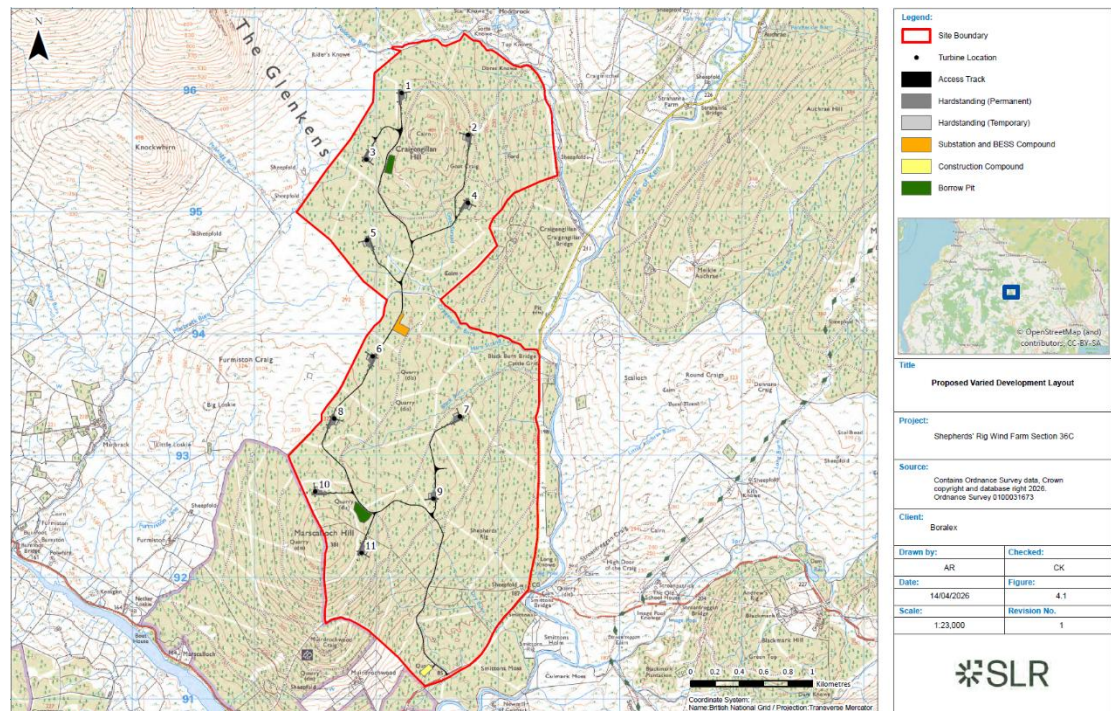
1.7 Description of the Proposed Varied Development

- 1.7.1 The Proposed Varied Development will comprise up to 11 wind turbines, each up to 220 m blade tip height, as well as associated infrastructure. In addition to the turbines, associated elements of the proposal will include:
- > turbine foundations;
 - > crane hard standings;
 - > a BESS facility;
 - > on-site access tracks between turbines and from the point of access to the turbines;
 - > watercourse crossings;
 - > on-site substation and maintenance building with welfare facility and associated communications equipment;
 - > on-site electrical cabling between the turbines and the substation and BESS;
 - > a temporary construction compound;
 - > a temporary concrete batching plant;
 - > two borrow pits to provide aggregate for construction; and
 - > habitat enhancement areas including forest to bog peatland restoration and native riparian planting.

1.7.2 As with the Consented Development, a number of off-site road improvements will be required including over-run areas, primarily along the B729 between Carsphairn and the site access. This has been presented in the **Abnormal Load Route Assessment (Appendix 15.1)** of the EIA Report. An environmental appraisal of the off-site road works has also been provided as **Appendix 15.2**.

1.7.3 The layout for the Proposed Varied Development is shown in **Figure 1.2** below.

Figure 1.2: Proposed Varied Development



1.7.4 As with the Consented Development, it is anticipated that the electricity produced by the Proposed Varied Development will be exported to the wider electricity network via the proposed Lorg Grid Connection 132 kilovolt ('kV') overhead line, which would intersect the centre of the site. A Section 37 application was submitted by ScottishPower Energy Networks ('SPEN') in November 2025 for the construction and operation of this new 132 kV line (ECU reference ECU00001789), which includes a full assessment of the grid connection route. There would be a short (approximately 200 m) underground connection between the Proposed Varied Development's substation, and this proposed line, which would be subject to a separate consenting process by SPEN.

1.7.5 The potential for cumulative effects of the Proposed Varied Development and the proposed Lorg Grid Connection has been considered by each technical assessment topic (**Chapters 7 - 18**) as appropriate. For the purposes of this application and the EIA Report, an initial assessment of the short connection between the two developments has been undertaken and is provided in **Appendix 4.2 of the EIA Report**. This presents a high-level, desk-based review of environmental constraints and identifies any potential for likely significant effects of the indicative corridor from the on-site substation to the 132 kV overhead line.

1.7.6 The connection arrangements are discussed further in **Chapter 4** of the EIA Report. It is acknowledged that the deliverability of both the Consented Development and Proposed Varied Development is dependent on securing the necessary Section 37 consent for the associated grid infrastructure. Without this, the operational benefits of both developments could not be achieved.

1.7.7 Consent is being sought for an operational life of 40 years from the date of final commissioning of the wind turbines.

1.7.8 A summary of the changes between the Consented Development and the Proposed Varied Development are summarised in **Table 1.1** below.

Table 1.1: Summary of Development Changes

Factor	Consented Development	Proposed Varied Development	Summary of Key Changes
Maximum Number of Turbines	17	11	Removal of six turbines
Maximum Turbine Tip Height	125 m and 149.9 m	220 m	Increase in maximum tip height up to 95 m
Turbine Foundations	500 m ³ of concrete	1,440 m ³ of concrete	Increase of 940 m ³ per turbine
Crane Hardstanding	1,780 m ²	3,202 m ²	Increase of 1,422 m ² per turbine
On-site Access Track Length	11 kilometres (km) (9 km new and 2 km existing)	10.3 km – 7.7 km new and 2.6 km existing	Reduction of 0.7 km in total track length and 1.3 km in new track construction.
Temporary Construction Compound	100 m x 50 m	100 m x 50 m	Relocated approximately 65 m south and rotated 90 degrees anti-clockwise.
Substation and BESS Compound	3,480 m ² Total BESS capacity of 6 MW.	10,890 m ² Total BESS capacity of 50 MW	Increase in area by 7,410 m ² and increase in BESS capacity of 44 MW
Borrow Pits	2	2	No change
Watercourse crossings	10	7	Reduction of three watercourse crossings.
Permanent Anemometer mast	1	0	Anemometer mast no longer required.
Micrositing Allowance	50 m	100 m	Increase of 50 m
Operational lifetime	30 years	40 years	Increase of 10 years
Total Generation Output	70.2 MW	77 MW	Increase of 6.8 MW
Total Maximum Output	76.2 MW	84.6 MW*	Increase of 8.4 MW
Estimated Energy Yield (P50)	158.00 GWh/year	241.34 GWh/year	Increase of approximately 53%

* It should be noted that although the Proposed Varied Development comprises 127 MW of renewable energy, no more than 84.6 MW will be exported to the grid at any one time. This is limited by grid connection capacity.

1.8 Scope & Structure of Statement

- 1.8.1 The planning policy framework changed significantly in early 2023, with the approval and coming into force of National Planning Framework 4 ('NPF4') and with the publication of a new Onshore Wind Policy Statement ('OWPS'). The Local Development Plan ('LDP') for the Dumfries and Galloway area was adopted in 2019.
- 1.8.2 This Planning Statement presents an assessment of the Proposed Varied Development against relevant policy with due regard given to the provisions of the statutory Development Plan made up of both NPF4 and the Dumfries and Galloway LDP, national energy and planning policy, and other relevant material considerations.
- 1.8.3 As noted above, the application is accompanied by an EIA Report. The Planning Statement draws on the findings of and should be read in conjunction with the associated EIA Report and the various drawings and plans which are included as part of the Section 36C application package. The EIA Report and other relevant accompanying documents are referenced throughout where they provide more detailed information that is not essential to repeat for the purposes of this Planning Statement. The Planning Statement considers the potential benefits and adverse effects which may arise and concludes as to the overall acceptability of the Proposed Varied Development in relation to the planning policy framework and relevant material considerations.
- 1.8.4 This Planning Statement is structured as follows:
- > **Chapter 2** sets out the up-to-date position with regard to the renewable energy policy and emissions reduction legislative framework and includes reference to the OWPS and the Scottish Government's Draft Energy Strategy and Just Transition Plan and other considerations;
 - > **Chapter 3** summarises the benefits that would arise from the Proposed Varied Development;
 - > **Chapter 4** appraises the Proposed Varied Development against the most relevant policy provisions of NPF4;
 - > **Chapter 5** appraises the Proposed Varied Development against the relevant provisions of the Local Development Plan and related guidance; and
 - > **Chapter 6** examines the planning balance and presents overall conclusions.

2. The Renewable Energy Policy & Legislative Framework

2.1 Introduction

- 2.1.1 This chapter refers to the renewable energy policy and emissions reduction legislative framework with reference to relevant international, UK, and Scottish provisions. The framework of international agreements and obligations, legally binding targets and climate change global advisory reports is the foundation upon which national energy policy and greenhouse gas emissions ('GHG') reduction law is based. This underpins what can be termed the need case for renewable energy from which the Proposed Varied Development can draw a high level of support.
- 2.1.2 The Proposed Varied Development requires to be considered against a background of material, UK and Scottish Government energy and climate policy and legislative provisions, as well as national planning policy and advice. These taken together provide very strong support for the Proposed Varied Development in principle.
- 2.1.3 It is evident that there is clear and consistent policy support at all levels, from international to local, for the deployment of renewable energy generally, to combat the global climate crisis, diversify the mix of energy sources, achieve greater security of supply, and to attain legally binding emissions reduction targets.
- 2.1.4 UK and Scottish Government renewable energy policy and associated renewable energy and electricity targets are important considerations. It is important to be clear on the current position as it is a fast-moving topic of public policy. The context of international climate change commitments is set out below. This is followed by reference to key UK level statutory and policy provisions and then a detailed description of relevant Scottish Government statutory and policy provisions is set out.

2.2 International Commitments

The Paris Agreement (2015)

- 2.2.1 In December 2015, 196 countries adopted the first ever universal, legally binding global climate deal at the Paris Climate Conference (COP21). It entered into force in November 2016. The Paris Agreement within the United Nations Framework Convention on Climate Change sets out a global action plan towards climate neutrality with the aims of stopping the increase in global average temperature to well below 2°C above pre-industrial levels and to pursue efforts to limit global warming to 1.5°C.
- 2.2.2 It is clear that moving to a low carbon economy is a globally shared goal and will require absolute emission reduction targets. The UK Government's commitment under the Paris Agreement links to the Climate Change Committee's (CCC) advice to both the UK and Scottish Governments on 'Net Zero' targets which have now, at both the UK and Scottish levels, been translated into new legislative provisions and targets for both 2045 (Scotland) and 2050 (UK). This is referred to below.
- 2.2.3 The Paris Agreement does not itself represent Government policy in the UK or Scotland. However, the purpose of domestic and renewable energy and GHG reduction targets is to meet the UK's commitment in the Paris Agreement.

UN Emissions Gap Report (2025)

- 2.2.4 The UN Emissions Gap Report (November 2025) entitled "Off Target" provides the annual independent science-based assessment of the gap between the pledged GHG reductions,

and the reductions required to align with the long-term temperature goal of the Paris Agreement.

- 2.2.5 The Executive Summary Report comments on the background of GHG emission increases and the new Nationally Determined Contributions ('NDCs') submitted ahead of COP30 in Brazil as follows (page xii):
- "As this sixteenth Emissions Gap Report shows, the new NDCs have limited effect on narrowing the emissions gap by 2030 and 2035, leaving global warming projections well above the Paris Agreement's temperature goal. New scenarios show that limiting warming to 1.5°C by 2100 remains technically possible. However, due to the continued delay in deep emission cuts, 1.5°C pathways now imply higher and higher temporary exceedance of this temperature target. The magnitude and duration of this overshoot must be limited as much as possible. Each year of delayed action locks in carbon intensive infrastructure results in greater losses for people and ecosystems, higher adaptation costs and a heavier reliance of costly and uncertain carbon dioxide removal. Each year of inaction makes the path to net zero by 2050 and net negative emissions thereafter steeper, more expensive and more disruptive."*
- 2.2.6 Section 7 of the Executive Summary sets out that *"despite the increasing likelihood of higher and longer temperature overshoot, pursuing efforts to limit global warming to 1.5°C remains as critical and relevant as ever"*.
- 2.2.7 The report adds: *"accelerated mitigation action provides benefits and opportunities. In many cases, mitigation aligns with economic growth, job creation, energy security and achievement of other pressing development needs and the sustainable development goals. The required technologies are available, and wind and solar energy development continue to exceed expectations, lowering deployment costs and driving market expansion. Yet deployment remains insufficient, and accelerated emission reductions require overcoming policy, governance, institutional and technical barriers....."*
- 2.2.8 The latest Gap Report is expressly clear that the international position in relation to combating climate change is worsening. The conclusions also make clear that deployment of renewable energy, including wind energy, remains key to combating the climate emergency.

2.3 UK Climate Change & Energy Legislation & Policy

The Climate Emergency

- 2.3.1 A critical part of the response to the challenge of climate change was the climate emergency which was declared by the Scottish Government in April 2019 and by the UK Parliament in May 2019. The declaration of climate emergency needs to be viewed in the context in which it was declared (advice from the Climate Change Committee 'CCC') and in response to commitments under the Paris Agreement and what followed from it as a result of the declaration (new emissions reduction law).

The Climate Change Act 2008 & Carbon Budgets

- 2.3.2 The Climate Change Act 2008 (the 2008 Act) provides a system of carbon budgeting. Under the 2008 Act, the UK committed to a net reduction in GHG emissions by 2050 of 80% against the 1990 baseline. In June 2019, secondary legislation was passed that extended that target to at least 100% against the 1990 baseline by 2050, with Scotland committing to Net Zero by 2045.
- 2.3.3 The 2008 Act also established the CCC which advises the UK Government on emissions targets, and reports to Parliament on progress made in reducing GHG emissions.
- 2.3.4 The CCC has produced seven, four yearly carbon budgets, covering 2008 – 2042. These carbon budgets represent a progressive limitation on the total quantity of GHG emissions to be emitted over the five-year period as summarised in **Table 2.1** below. Essentially, they are five yearly caps on emissions.

- 2.3.5 These legally binding 'carbon budgets' act as stepping-stones toward the 2050 target. The CCC advises on the appropriate level of each carbon budget and once accepted by Government, the respective budgets are legislated by Parliament.

Table 2.1: Carbon Budgets and Progress¹

Budget	Carbon budget level	Target Reduction below 1990 levels	Progress on Budgetary Period (reduction amount v Target)
1 st carbon budget (2008 – 2012)	3,018 MtCO ₂ e	26%	-27%
2 nd carbon budget (2013 – 2017)	2,782 MtCO ₂ e	32%	-42%
3 rd carbon budget (2018 – 2022)	2,544 MtCO ₂ e	38% by 2020	-50% ²
4 th carbon budget (2023 – 2027)	1,950 MtCO ₂ e	52% by 2025	n/a
5 th carbon budget (2028 – 2032)	1,725 MtCO ₂ e	57% by 2030	n/a
6 th carbon budget (2033 – 2037)	965 MtCO ₂ e	78% by 2035	n/a
7 th carbon budget (2038 – 2042)	535 MtCO ₂ e	87% by 2040	n/a
Net Zero Target	100%	By 2050	

- 2.3.6 The Sixth Carbon Budget (CB6) requires a reduction in UK greenhouse gas emissions of 78% by 2035 relative to 1990 levels. This is seen as a world leading commitment, placing the UK *"decisively on the path to Net Zero by 2050 at the latest, with a trajectory that is consistent with the Paris Agreement"* (CB6, page 13).

- 2.3.7 Page 23 of CB6 refers to the devolved nations and sets out that UK climate targets cannot be met without strong policy action across Scotland, Wales and Northern Ireland. Key points from CB6 include:

- > UK climate targets cannot be met without strong policy action in Scotland.
- > The CCC is clear in setting out that new demand for electricity will mean that electricity demand will rise 50% to 2035 and doubling or even trebling by 2050.
- > CB6 needs to be met and that will need more and faster deployment of renewable energy developments than has happened in the past.
- > The related 'Methodology Report' from the CCC advice, states that in all scenarios for the carbon budget and looking ahead to 2050, the CCC sees new onshore wind generation being deployed by 2050. They set out that their modelling reflects this by almost doubling onshore wind capacity to 20-30 GW in all scenarios by 2050.

- 2.3.8 Following the Sixth Carbon Budget, the UK Government announced on 20 April 2021 that it would set the world's most ambitious climate change target into law (by the Carbon Budget Order 2021 (the Order)³) to reduce emissions by 78% by 2035 compared to 1990 levels. This

¹ Source: Climate Change Committee (CCC).

² Confirmed by CCC in 'Final Statement for the Third Carbon Budget' May 2024. By the end of the period in 2022, UK net GHG emissions were 50% lower than the base year emissions.

³ The Order sets the carbon budget for the 2033-2037 budgetary period at 965 million tonnes of carbon dioxide equivalent. The net UK carbon account is defined in section 27 of the Climate Change Act 2008.

effectively brings forward the UK's previous commitment of an 80% reduction by 2050 by 15 years.

2.3.9 The Seventh Carbon Budget ('CB7') was published by the CCC in February 2025. The CCC's recommended level for CB7, namely a limit on the UK's GHG emissions over the five-year period 2038 to 2042 is 535 MtCO₂e including emissions from international aviation and shipping.

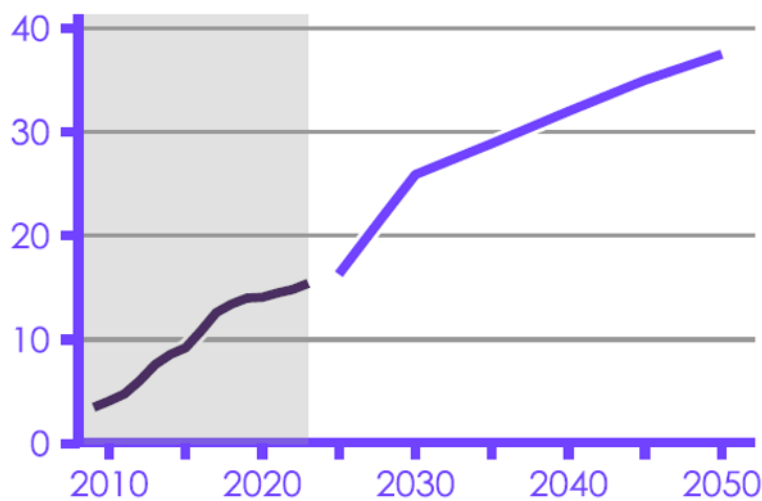
2.3.10 Page 12 of the CB7 states:

"By the middle of the Seventh Carbon Budget on our pathway, emissions in the UK will be only a quarter of the level they are today, and 80% lower than levels in 1990 (90% lower excluding emissions from international aviation and shipping.) Achieving this will require a significant reduction in emissions across sectors including surface transport, buildings, industry and agriculture."

2.3.11 It sets out (page 12) that achieving CB7 will mean that UK based renewable energy provides the bulk of generation and this will replace oil and gas across most of the economy. It adds that *"this requires twice as much electricity as today by 2040"*.

2.3.12 It further states that low carbon supply by 2040 will see offshore wind grow sixfold from 15 GW of capacity in 2023 to 88 GW by 2040. It adds that *"onshore wind capacity doubles to 32 GW by 2040 and solar capacity increases to 82 GW"* (page 13). The anticipated growth of onshore wind capacity is shown in the Report (page 109) and illustrated in **Figure 2.1** below.

Figure 2.1: Onshore Wind Operational Capacity (GW) in CCC 'Balanced Pathway'



2.3.13 The report notes that this will require recent annual installation rates to treble this decade, requiring installation rates comparable to the annual roll-out rates previously sustained during the mid-2010s.

2.3.14 The Balanced Pathway requires an average deployment rate of 0.8 GW per year, with deployment peaking at 1.9 GW in 2030, which is comparable to the historical peak of 1.8 GW in 2017.

2.3.15 CB7 states that *"there are a range of barriers that will need to be overcome to enable the levels of deployment required. This will require concerted action on several areas, including planning, grid connections, and supply chain bottlenecks"*.

The British Energy Security Strategy (April 2022)

- 2.3.16 The British Energy Security Strategy ('the Strategy') was published by the UK Government on 7 April 2022. The Strategy focuses on energy supply and states that in the future nuclear will have an expanded role and that renewables have an important role: the foreword states *inter alia*:

"Accelerating the transition away from oil and gas then depends critically on how quickly we can roll out new renewables...."

"The growing proportion of our electricity coming from renewables reduces our exposure to volatile fossil fuel markets."

- 2.3.17 Reducing Scotland's and the wider UK's dependency on hydrocarbons has important security of supply, electricity cost and fuel poverty avoidance benefits. Those actions already urgently required in the fight against climate change are now required more urgently for global political stability and insulation against dependencies on rogue nation states.

The UK Battery Strategy (2023)

- 2.3.18 The UK Government published the UK Battery Strategy on 26 November 2023. The Strategy brings together Government activity to achieve a globally competitive battery supply chain by 2030 that supports economic prosperity and the Net Zero transition in the UK.

- 2.3.19 In summary, the Government's vision is for the UK to continue to grow a thriving battery innovation system and to become a world leader in sustainable design, manufacture and use.

- 2.3.20 The Strategy was developed with the UK Battery Strategy Task Force, drawing upon a call for evidence and engagement with business and stakeholders. The Strategy is based around the 'design, build, sustain' approach and through the strategy sets the key objectives that the UK will:

- > Design and develop batteries for the future;
- > Strengthen the resilience of UK manufacturing supply chains; and
- > Enable the development of a sustainable battery industry.

- 2.3.21 In the foreword to the document, the Minister of State for Industry and Economic Security at the Department of Business and Trade states that (page 3):

"Batteries will play an essential role in our energy transition and our ability to successfully achieve Net Zero by 2050."

- 2.3.22 Batteries are seen as key to the Net Zero transition as they enable more flexible use of energy such as maximising use of intermittent low carbon generation.

Climate Change Committee Report to UK Parliament (June 2025)

- 2.3.23 The CCC published its report 'Progress in reducing emissions – 2025 Report to Parliament' (the CCC 2025 Report) in June 2025. It highlights that *"greenhouse gas emissions have more than halved since 1990, with the pace of reduction having more than doubled since the introduction of the UK's Climate Change Act in 2008"* (Page 10).

- 2.3.24 The CCC 2025 Report highlights (page 15) that renewable electricity generation expanded more in 2024 than in any of the previous six years, driven by wind and solar. However, the pace still needs to accelerate significantly to meet 2030 goals. This will require a tripling in annual installations of both offshore and onshore wind (and a four-fold increase in solar compared to the average rate seen since the start of the decade).

- 2.3.25 Total operational capacity for onshore wind in the UK was 16 GW in 2024, and further capacity is currently contracted to bring total capacity to 20 GW by 2027. The report goes on to state in relation to reaching the 27GW 2030 target (UK) for onshore wind, which is the

lower end of the Government's capacity range, "will require more than 1.8 GW to be added each year on average, the same as the peak seen in 2017. However, only 0.8 GW of onshore wind was installed in 2024. Onshore wind installation rates will need to triple compared to the average pace of deployment since the start of the decade." (page 60)

2.3.26 In terms of the required emissions savings to achieve the 2030 Nationally Determined Contributions ('NDC') the CCC 2025 Report highlights some risks. One of which include "delivery risks for planning, grid connections, and successful Contracts for Difference auctions to deliver the rest of the renewables deployment required by 2030 under the Clean Power 2030 Action Plan". (page 17)

2.3.27 On page 105 the role of low carbon electricity is highlighted further in reducing emissions. In the Committee's Seventh Carbon Budget advice, 60% of the required emissions reduction is delivered through electrification and low-carbon electricity. The CCC 2025 Report sets out at Box 3.5:

"Delivering this requires continued growth of renewables deployment over the coming years, to ensure a rapid scale-up in supply of low-carbon electricity."

- > *Renewable generation from wind and solar is well established and is the cheapest form of new electricity generation capacity.*
- > *The UK also benefits from extensive wind resources.*
- > *As such, renewables have an essential role to play in achieving Net Zero and meeting the vast majority of demand in the Balanced Pathway. This will require strong and sustained deployment of renewables capacity...*

These technologies need to be accompanied by rapidly expanding the transmission grid, upgrading the distribution network, and speeding up the grid connection process."

2.3.28 In relation to transmission and grid readiness, these are highlighted as critical enablers for renewable deployment and electrification.

Labour Government & Commitment to Renewables (2024)

2.3.29 The UK Government changed at Westminster in 2024 and a Labour administration for the UK is of relevance in terms of the new UK Government policy approach to net zero.

2.3.30 Energy policy is reserved to Westminster and although the Scottish Government has progressed its own energy policy in parallel with its full devolved authority over the planning system in Scotland, UK Government policy is an important material consideration.

2.3.31 The Department for Energy Security and Net Zero ('DESNZ') issued a Statement on 8 July 2024 which included references to doubling UK onshore wind capacity from its current level of approximately 15 GW to a planned capacity of 30 GW by 2030.

UK Government: Clean Power 2030 Action Plan (2024)

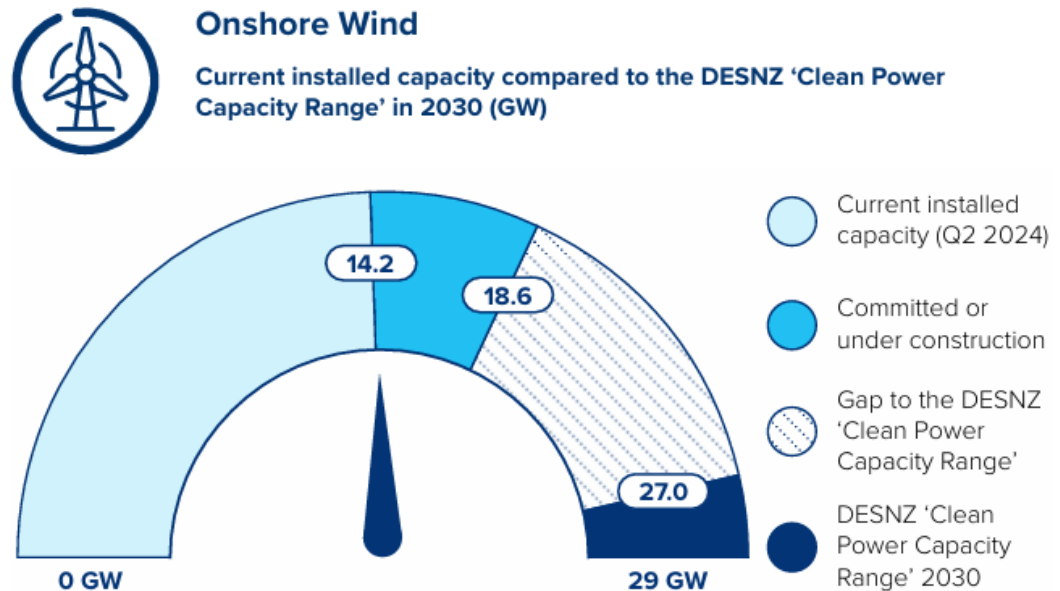
2.3.32 The Clean Power 2030 Action Plan was published by the Department for Energy Security and Net Zero (DESNZ) in December 2024. It sets out (page 9) that Britain needs to install "clean sources of power at a pace never previously achieved".

2.3.33 It further adds (page 10):

"clean power by 2030 will herald a new era of clean energy independence and tackle three major challenges: the need for secure and affordable energy supply, the creation of essential new energy industries supported by skilled workers in their thousands, the need to reduce greenhouse gas emissions and limit our contribution to the damaging effects of climate change. Clean power by 2030 is a sprint towards these essential goals".

- 2.3.34 The Action Plan sets out that by 2030 there should be 27-29 GW of onshore wind operational within the UK. At the time of the publication of the CP2030, there was 14.2 GW of installed onshore wind capacity in the UK, illustrated below in **Figure 2.2**. Figure 2.2 illustrates the gap between current onshore wind installed capacity compared to the DESNZ requirement to 2030.

Figure 2.2: Onshore Wind & 'Gap' to reach 2030 UK Target



- 2.3.35 Renewable UK's Onshore Wind Report⁴ indicates that at September 2025 the UK had 15.8 GW of onshore wind capacity in operation.
- 2.3.36 The document adds that *"Meeting the clean power 2030 goal is key to accelerating to net zero, not only in eliminating emissions that currently come from electricity generation, but also via the application of clean power in the buildings, transport and industry sectors... The shift to a clean power system by 2030 forms the backbone of the transition to net zero, as we move to an economy much more reliant on electricity"*.
- 2.3.37 Page 74 of the Action Plan states that *"Meeting the renewable capacity set out in the DESNZ 'clean power capacity range' is achievable but will require deployment at a sharply accelerated scale and pace"*.
- 2.3.38 The Action Plan (Connections Reform Annex) also sets out technology capacity ranges that the National Energy System Operator ('NESO') proposes to use as an indication of what is required by 2035 and references onshore wind as having a range of 31-32 GW by 2035. It is important to note that the capacity figures referenced in the Action Plan are not caps.
- The Onshore Wind Taskforce Strategy (July 2025)**
- 2.3.39 DESNZ published the Onshore Wind Taskforce Strategy ('OWTS') in July 2025, which sets out over 40 actions, primarily Government commitments to resolve key blocks to onshore wind within the UK. The OWTS's overall aims are to boost onshore wind deployment and to deliver economic benefits for local communities, businesses and the consumer.
- 2.3.40 The Ministerial Foreword by the Secretary of State for Energy Security and Net Zero states:

⁴ Renewable UK (2025) Onshore wind pipeline report 2025.

“As one of the cheapest and fastest to build sources of power we have, onshore wind will play a critical role in boosting our energy independence with clean power by 2030. The reality is that every turbine we build helps protect families, businesses and the public finances from future fossil fuel shocks.

That's why in our first 72 hours in office, we lifted the onshore wind band in England - in place for nine years under the previous Government. And it's why last July we established the Onshore Wind Taskforce to bring Government, industry and trade unions together to explore how we can radically accelerate deployment of this critical technology.

The Onshore Wind Taskforce strategy is the outcome of that work. It sets out more than 40 steps Government and industry will take to help deliver up to 29GW of onshore wind by 2030. That includes driving ambitious reforms to planning, grid connections, and routes to market, while building the supply chains and skilled workforce we need.”

2.3.41 In addition, within the foreword the statement by the Head of Clean Power 2030 within DESNZ states (page 5) *inter alia*:

“Clean Power 2030 is our ambitious mission to grow rapidly Britain's clean electricity infrastructure, reducing Britain's dependency on imported oil and gas, securing key clean industries and readying the country for the expected growth in electrical demand over the next 20 years.

Our Clean Power Action Plan targets a near doubling of onshore wind capacity up to 29GW by 2030. That will require rapid development of new onshore wind across Britain and repowering of existing sites to bring British consumers some of the cheapest homegrown power that can be produced. We are already working with NESO to slash the queue of projects waiting to connect to the grid to accelerate the best onshore wind development.

Rapid deployment of onshore wind is our first line of defence against future gas price spikes - every megawatt added displaces imported gas in the power system. With the steps in this new strategy, we will cement the growth of an important homegrown industry. The momentum behind clean power continues to grow.”

2.3.42 As noted above, whilst 2030 is a key target date but a milestone en route to attaining net zero, generation capacity figures are not caps and there will still be a requirement for new generation capacity post 2030.

2.3.43 The various commitments and actions within the strategy cover:

- > Scoping, planning and consenting improvement for onshore wind projects;
- > Networks and systems reform;
- > Aviation and defence commitments to improve the interface between wind energy and civil and military radar and related matters including Eskdalemuir;
- > Finance and routes to market; and
- > Supply chains, skills and workforce.

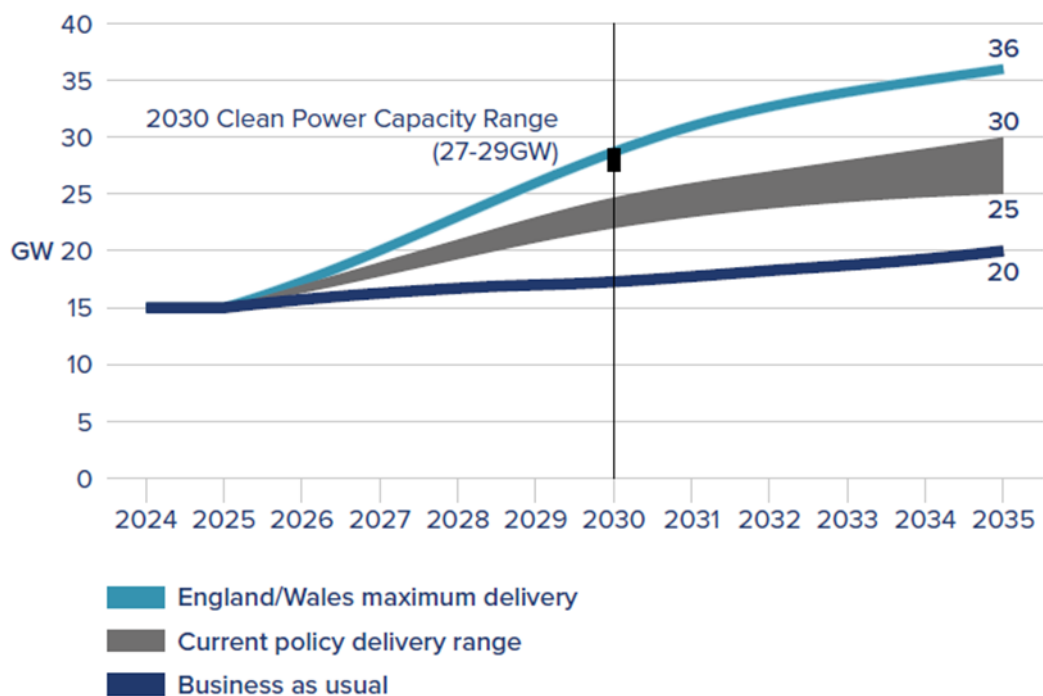
2.3.44 The OWTS refers to the Government's Clean Power Action Plan, which was published in December 2024 and which set out a pathway to achieving the mission of clean power by 2030. Page 10 of the strategy states that:

“All routes to achieving this mission are reliant on mass deployment of renewable electricity technologies, including onshore wind. The Clean Power Plan stated that to decarbonise the power sector by 2030, 27 to 29GW onshore wind will be needed within GB. That is a significant increase above the current installed capacity, which stands at 14.8 GW in GB (over 16GW in the UK)”.

2.3.45 It is explained that the delivery of up to 29 GW of onshore wind by 2030 would involve around 10-12 GW more than would have been deployed under historic growth rates, with England contributing around 2 GW by 2030.

- 2.3.46 The OWTS also emphasises the significant economic opportunity that further onshore wind deployment will deliver (pages 10 and 11). It states that meeting the onshore wind 2030 targets together with the actions within the strategy, could deliver up to 45,000 direct and indirect jobs in Great Britain and result in £70 million per year of extra investment in community benefits.
- 2.3.47 At page 18 of the OWTS, reference is made to illustrative deployment scenarios which it states emphasises “the challenge in meeting the 2030 clean power range in GB which will require significant deployment in Scotland, England and Wales.” This is illustrated in **Figure 2.3** below (reproduction of Figure 5 from the OWTS).

Figure 2.3: Clean Power Deployment Scenarios (Onshore Wind)



- 2.3.48 The scenarios as illustrated in Figure 2.3 include:
- > *Business as usual* - under this scenario onshore wind only reaches in the region of 17 GW by 2030 and 20 GW by 2035.
 - > *Current policy delivery range* - this assumes the “seamless implementation” of the reform announced as part of the Clean Power 2030 Action Plan and the actions set out in the Onshore Wind Taskforce Strategy. In this scenario up to around 25 GW is installed by 2030 and 30 GW by 2035.
 - > *England / Wales maximum delivery* - this is set out as the most optimistic scenario and shows the potential of increasing onshore wind deployment through strengthened policies in England and Wales. Under this scenario onshore wind deployment could reach levels consistent with the 2030 Clean Power range but also increases to in excess of 35 GW by 2035.
- 2.3.49 The OWTS addresses implementation and states (page 71) that the Government is committed to delivering the level of onshore wind needed by 2030.

Government Statement on Energy Security (March 2026)

- 2.3.50 The Energy Secretary (The Right Hon Ed Miliband MP) issued a statement on 15 March 2026 outlining a package of measures to go “further and faster” in the pursuit of national energy security, as a response to events in the Middle East. The Energy Secretary announced various energy interventions to boost the UK’s energy security, including relating to solar deployment and stated an intention to bring forward the Government’s next annual renewables option to July 2026. The Energy Secretary stated:

“Global events demonstrate there is not a moment to waste in our drive for clean power because there can be no energy security while we are so dependent on fossil fuels... everything we are doing is about one purpose: fighting the corner of the British people by taking back control of our energy”.

2.4 Scotland: Climate Change & Emissions Reduction Legislation and Advice

The Climate Change (Scotland) Act 2009 and The Climate Change (Emissions Reduction Targets) (Scotland) Act 2019

- 2.4.1 The Scottish Government has put in place a legal framework to decarbonise and reduce emissions. Most notably, the Scottish Government has a statutory target to achieve “net zero” by 2045. It is clear that to have any hope of achieving the net zero target, significant expansion of renewable generation capacity is required.
- 2.4.2 When it was enacted, the Climate Change (Scotland) Act 2009 set world leading greenhouse gas emissions reduction targets, including a target to reduce emissions by 80% by 2050. The Climate Change (Emissions Reduction Targets) (Scotland) Act 2019 amended the 2009 Act setting even more ambitious targets to reach net zero by 2045.
- 2.4.3 Scotland will need significant expansion of renewable generation capacity to achieve these ambitious targets by 2045.

The Climate Change (Emissions Reduction Targets) (Scotland) Act 2024

- 2.4.4 The Climate Change (Emission Reduction Targets) (Scotland) Act 2024⁵ (‘the 2024 Act’) received Royal Assent on 22 November 2024 and was brought into force the following day. The 2024 Act repealed the annual and interim emissions reduction target framework that was established under the 2009 Act and establishes a carbon budget approach to target setting, with budgets to be set through secondary legislation using the latest advice from the CCC, to replace the concept of statutory annual and interim targets. The 2024 Act also makes provision for a new Climate Change Plan to be published that reflects the carbon budgets.
- 2.4.5 The 2024 Act followed advice from the CCC that Scotland’s interim emissions reduction target for 2030 could not be achieved. The 2024 Act does not change the existing statutory target of net zero emissions by 2045.
- 2.4.6 The emissions reductions targets set out are significant, as the 2009 Act states the Scottish Ministers have a duty to ensure the targets are met. The Scottish Ministers have duties to keep the Scottish Parliament informed about whether the targets are being met and to publish plans for meeting those targets. All Scottish public authorities also have a duty to exercise their functions in a way best calculated to contribute to the delivery of the targets.

CCC Report, Scotland’s Carbon Budgets, Advice for the Scottish Government (May 2025)

- 2.4.7 This CCC Report was published in May 2025, and it sets out the CCC’s advice on the level of Scotland’s four proposed carbon budgets, covering the period 2026 to 2045. It recommended that the Scottish Government set carbon budgets.

⁵ Scottish Government (2024) Climate Change (Emissions Reduction Targets) (Scotland) Act 2024.

- 2.4.8 The report states (page 9) that getting to net zero by 2045 will require immediate action, at pace and scale and adds that decisions on the exact pathway and policies are for the Scottish Government.
- 2.4.9 The Report explains that progress to date has largely come from electricity decarbonisation, reflecting Scotland's abundant renewable resources. It goes on to state (page 9) that:
"Action will increasingly be required in predominantly devolved policy areas to hit the Net Zero 2045 target and the proposed carbon budgets. Now that the framework for climate action has been reset, the Scottish Government has the opportunity to use its powers to match its ambitions with action."
- 2.4.10 The Report identifies priority actions, which over the period of the first two carbon budgets will be the remaining decarbonisation of electricity generation as well as further electrification of key technologies, particularly the roll-out of EVs and heat pumps.
- 2.4.11 The Report identifies the sources of future emissions reductions and notes that in the next decade, over the next two carbon budgets, they are predominantly met from electrification of key technologies across the economy and measures to reduce demand for high-carbon activities.
- 2.4.12 Specifically in relation to electricity and low carbon supply the Executive Summary explains (page 12) that in the Balanced Pathway set out by the CCC:
*"the capacity of variable renewables in Scotland (including offshore and onshore wind and solar) more than triples from 15 GW in 2023 to 49 GW by 2035, **increasing to 66 GW by 2045**. This provides 98% of electricity generation in Scotland in 2035 and caters for increasing demand in Scotland and the rest of Great Britain (GB). Grid storage, use of storable fuels on the GB-wide network, and smart demand flexibility ensure a reliable supply of electricity even in adverse weather years. These technologies need to be accompanied by rapidly expanding the transmission grid, upgrading the distribution network, and speeding up the grid connection process. To deliver clean electricity, the planning process to approve large electricity infrastructure projects in Scotland needs to be urgently improved."* (Emphasis added)
- 2.4.13 Scotland currently has approximately 17.9 GW⁶ of renewables operating capacity. Therefore, to achieve the Balanced Pathway figure of 66 GW by 2045 will require an additional 48.1 GW to be deployed. This would equate to approximately 2.5 GW of operating capacity coming online each year over the next 20 years.
- 2.4.14 The Report sets out in more detail the key actions to deliver the Balanced Pathway in electricity supply. At page 94 it refers to the key action for the Scottish Government which is to *"Urgently improve the planning process to approve large electricity infrastructure projects in Scotland, such as transmission lines and onshore wind farms."* citing that it can currently take up to four years to approve large electricity infrastructure projects in Scotland.
- 2.4.15 The Report makes reference to the Scottish Government and the UK Government's commitment to reform the energy consents system in Scotland, including through measures in the Planning and Infrastructure Bill (now the Planning and Infrastructure Act 2025). It states that "Both governments should ensure that these reforms are now implemented at pace. All bodies involved in the planning and consenting process must also be adequately resourced and skilled."
- 2.4.16 Following the CCC's recommendations, the Climate Change (Scotland) Act 2009 (Scottish Carbon Budgets) Amendment Regulations 2025 ('2025 Regulations') came into force on the 10th October 2025. These Regulations reinforce the Scottish Government's commitment to achieving the climate targets. The 2025 Regulations amend the 2009 Act to include the Scottish carbon budgets for the five-year periods to 2045 and align with the recommendations of the CCC in May 2025.

⁶ Scottish Government (2026) Energy Statistics for Scotland – Q4 2025.

Climate Report to Scottish Parliament - Progress in reducing emissions in Scotland (February 2026)

- 2.4.17 The CCC produced a report to the Scottish Parliament entitled 'Progress in reducing emissions in Scotland' in February 2026 ('CCC 2026 Report').
- 2.4.18 The CCC 2026 Report acknowledges the progress made stating that *"the Scottish Government and Scottish Parliament have made rapid progress in legislating the levels of the four carbon budgets, covering the period 2026 to 2045."* This was secured through the 2025 Regulations as referenced above.
- 2.4.19 In relation to Energy supply the CCC 2026 Report states that (page 20):
"deployment of variable renewable electricity generation is continuing to increase in Scotland, with 1.1 GW of offshore and 1.3 GW of onshore wind capacity deployed in 2024. Remaining emissions in electricity generation come predominantly from the Peterhead gas-fired power station. Reducing emissions further relies on the continued roll-out of wind and solar generation and of network capacity to accommodate it. The draft CCP sets out plans to replace Peterhead with a CCS-enabled gas plant."
- 2.4.20 The CCC 2026 Report states that *"Scotland will need to continue its strong progress in rolling out renewable electricity generation and ensure development of electricity networks can keep pace. The Scottish Government should act to accelerate planning and consenting for transmission infrastructure to achieve this."* (Page 22)
- 2.4.21 At Page 77 this is discussed in further detail, and it notes that *"To achieve the Scottish Government's target of 20 GW of onshore wind by 2030, nearly 10 GW needs to be installed in the next five years, which would be a doubling of capacity. This equates to a rate of deployment approximately two and a half times higher than the average annual deployment in 2023 and 2024."*
- 2.4.22 The CCC 2026 Report acknowledges the progress in emission reductions relating to the energy supply noting that *"around two-thirds of the emissions reductions seen since the introduction of the Act in 2009 have been in the energy supply sector. Electricity supply in Scotland is now almost fully decarbonised"*. (Page 58)
- 2.4.23 However, it goes on to state that *"further expanding low-carbon generation and supporting transmission network infrastructure in Scotland remains critical to enable decarbonisation of other sectors and to supply low-carbon electricity to the rest of the UK."* (Page 58)
- 2.4.24 The CCC call on the Scottish Government to enable *"rapid expansion of renewable energy and ensure timely planning approval of the transmission infrastructure required to move power from generation sites to where it will be used"*. (Page 108)
- 2.4.25 The CCC 2026 Report identified positive progress over the last year in securing emissions reduction but identifies a lot more to do, including continued deployment of renewable energy infrastructure and the acceleration of the transmission infrastructure needed to support the route to net zero by 2045.

2.5 Scotland: Climate Change and Renewable Energy Policy

- 2.5.1 The sections which follow address the key Scottish Government climate change and energy policy and related documents. These are:
- > The Scottish Energy Strategy (2017);
 - > The Onshore Wind Policy Statement (2022);
 - > The Draft Energy Strategy and Just Transition Plan (2023);
 - > The Green Industrial Strategy (2024); and
 - > The Climate Change Plan (2025).

The Scottish Energy Strategy (2017)

- 2.5.2 The Scottish Energy Strategy (SES) was published in December 2017. The SES preceded the important events and publications referred to above but nevertheless sets out that onshore wind is recognised as a key contributor to the delivery of renewable energy targets – specifically 50% energy from renewable sources to be attained by 2030. The SES did not and could not take account of what may be required in terms of additional renewable generation capacity to attain the new legally binding ‘Net Zero’ targets so it is out of date in that respect.
- 2.5.3 The SES refers to “*Renewable and Low Carbon Solutions*” as a strategic priority (page 41) and states “*we will continue to champion and explore the potential of Scotland’s huge renewable energy resource, its ability to meet our local and national heat, transport and electricity needs – helping to achieve our ambitious emissions reduction targets*”.
- 2.5.4 The SES sets out what is termed the “opportunity” for onshore wind and there is explicit recognition that onshore wind is amongst the lowest cost forms of power generation. It is also recognised as “*a vital component of the huge industrial opportunity that renewables creates for Scotland*”.
- 2.5.5 The SES sets out the Government’s clear position on onshore wind namely:

“*our energy and climate change goals mean that onshore wind must continue to play a vital role in Scotland’s future – helping to decarbonise our electricity, heat and transport systems, boosting our economy, and meeting local and national demand.*” (page 44)

The Onshore Wind Policy Statement

- 2.5.6 The Scottish Government published an updated OWPS on 21 December 2022.
- 2.5.7 The Ministerial Foreword makes it clear that seeking greater security of supply and lower cost electricity generation are now key drivers alongside the need to deal with the climate emergency. In this regard, the Cabinet Secretary for Net Zero, Energy and Transport states (page 3):

“*that is why we must accelerate our transition towards a Net Zero society. Scotland already has some of the most ambitious targets in the world to meet Net Zero but we must go further and faster to protect future generations from the spectre of irreversible climate damage*”.
- “*Scotland has been a frontrunner in onshore wind and, while other renewable technologies are starting to reach commercial maturity, continued deployment of onshore wind will be key to ensuring our 2030 targets are met*”.
- 2.5.8 The Foreword states that onshore wind has the ability to be deployed quickly, is good value for consumers and is also widely supported by the public. The Minister further states that:

“*This Statement, which is the culmination of an extensive consultative process with industry, our statutory consultees and the public, sets an overall ambition of 20 GW of installed onshore wind capacity in Scotland by 2030.*
- “*While imperative to meet our Net Zero targets it is also vital that this ambition is delivered in a way that is fully aligned with, and continues to enhance, our rich natural heritage and native flora and fauna, and supports our actions to address the nature crisis and the climate crisis*”.
- 2.5.9 The OWPS is structured on the basis of eight chapters which contain a mix of policy guidance and also technical information. Key content of relevance to the Proposed Varied Development is referenced below.
- Increasing the Rate of Deployment & Forecast Increase in Electricity Demand*
- 2.5.10 Chapter 1 “Ambitions and Aspirations” (page 5) refers to current deployment of onshore wind in Scotland and states:

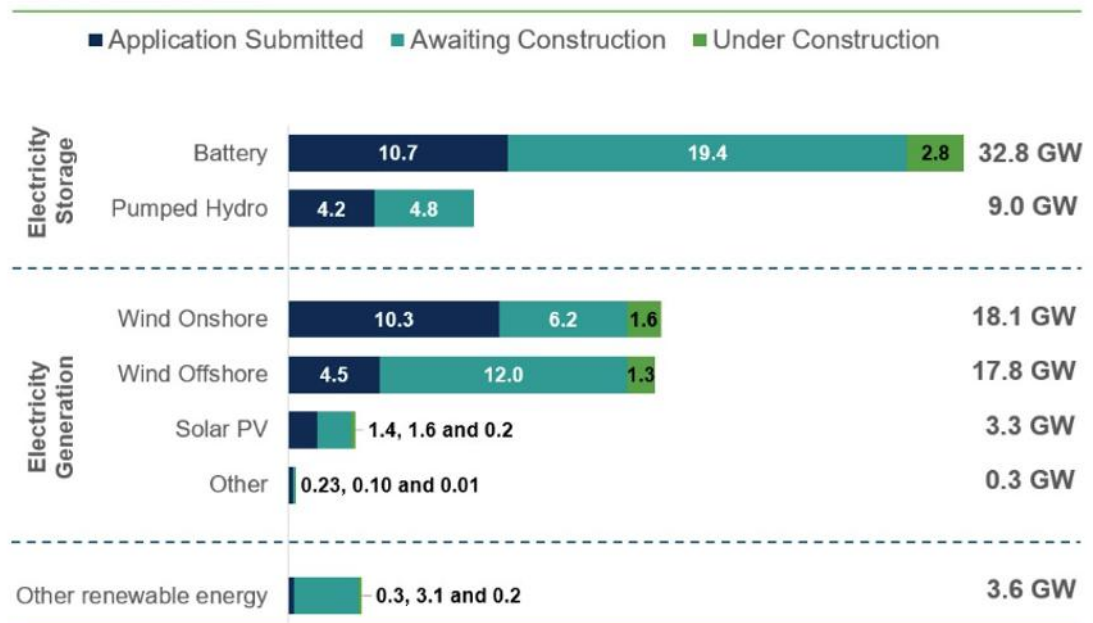
"We must now go further and faster than before. We expect the next decade to see a substantial increase in demand for electricity to support Net Zero delivery across all sectors, including heat, transport and industrial processes."

- 2.5.11 It is explained that National Grid's Future Energy Scenarios⁷ project concludes that Scotland's peak demand for electricity will at least double within the next two decades and that this will require a substantial increase in installed capacity across all renewable technologies.

Onshore Wind Target & Development Pipeline

- 2.5.12 In terms of existing deployment, paragraph 1.1.5 of the OWPS states that as of June 2022 the UK had 14.6 GW of installed onshore wind, with around 8.7 GW of this capacity within Scotland. Reference is made to a figure of 11.3 GW of onshore wind "currently in the pipeline, spread over 217 potential projects".
- 2.5.13 Updated figures on deployment and pipeline are provided by the Scottish Government in the Energy Statistics for Scotland which are released quarterly. The most recent statistics were published in April 2026⁸ for Q4 of 2025. Figure 2 from the statistics illustrates that Scotland had 10.5 GW of installed onshore wind capacity as of the end of December 2025.
- 2.5.14 In terms of development pipeline, Figure 3 (reproduced below as **Figure 2.3**) illustrates that 18.1 GW of onshore capacity was at Application stage; Awaiting construction or Under construction. The majority of capacity, 10.3 GW, was at Application stage, with 6.2 GW Consented / Awaiting construction, and 2.8 GW Under construction.
- 2.5.15 This means that 13.3 GW of onshore wind is committed (i.e. operational and under construction). There are no guarantees that the 6.2 GW of consented projects will all be built out for various reasons. Although other schemes are likely to be consented, it is important to reiterate that the 20 GW is not a cap and is a minimum target, not forgetting the wider generation and emission reduction targets beyond 2030 that still need to be met.

Figure 2.4: Estimated Capacity (GW) by technology and planning stage for renewable energy projects in pipeline in Scotland as of end December 2025



Source: DESNZ

⁷ National Grid has set out a range of different, credible ways to decarbonise the energy system with regard to attaining Net Zero for the UK by 2050.

⁸ Scottish Government (2026) Energy Statistics for Scotland – Q4 2025.

- 2.5.16 The footnote to the figures set out on page 6 of the OWPS is pertinent and is as follows:
- “Developments in the planning/consenting process have not yet been considered and given permission to proceed. Some of these projects will receive consent, but some may not, and it is unlikely that all of this noted capacity will be fully realised. A degree of duplication within the planning system must also be considered, where developments which have consent re-apply to adjust the parameters of that consent. This will also reduce the capacity which is deliverable from this overall figure”.*
- 2.5.17 There are therefore a number of factors which indicate that there may be a shortfall in deployment against the minimum 20 GW 2030 onshore wind target, and therefore it is important that the right developments in the right place are granted consent.
- Government commitment to 20GW of Onshore Wind by 2030
- 2.5.18 Section 1.2 of the OWPS refers to the Deployment Ambition to 2030. Reference is made to the Climate Change Committee's position as set out in their exploratory scenarios for emissions to 2050 and also as referred to within the Sixth Carbon Budget.
- 2.5.19 Paragraph 1.2.2 of the OWPS states that: *“these estimate that, in every scenario, the UK will require a total of 25-30 GW of installed onshore wind capacity by 2050 to meet government targets - which would mean doubling the current UK installed capacity”.*
- 2.5.20 Section 1.3 of the OWPS further refers to the new 20 GW ambition and acknowledges that the Scottish Government's Programme for Government 2022/2023 committed Government to enabling up to 12 GW of onshore wind to be developed and it is stated that:
- “It is vital to send a strong signal and set a clear expectation on what we believe onshore wind capacity will contribute in the coming years.*
- In line with this commitment, and reflecting the natural life cycles of existing wind farms, this statement sets a new ambition for the deployment of onshore wind in Scotland:*
- A minimum installed capacity of 20 GW of onshore wind in Scotland by 2030.*
- This ambition will help support the rapid decarbonisation of our energy system, and the sectors which depend upon it, as well as aligning with a just transition to Net Zero whilst other technologies reach maturity”.*
- 2.5.21 This statement is followed by reference to the “Legislative Context”, in particular the Climate Change (Emissions Reduction Targets) (Scotland) Act 2019 and the related Net Zero greenhouse gas emissions targets. The OWPS states (paragraph 1.4.1) *“meeting these targets will require decisive and meaningful action across all sectors”.*
- 2.5.22 Paragraph 2.4.2 states that *“onshore wind will play a crucial role in delivering our legally binding climate change targets”.*
- 2.5.23 The OWPS has made clear that the 20 GW ambition of installed capacity is a “minimum” (page 6). In short, there is a substantial shortfall to address in order to attain that figure and projects that are not yet in the planning system are unlikely to provide installed capacity by 2030. This underlines the importance of the benefits that the Proposed Varied Development can deliver – namely near-term delivery of a substantial volume of installed capacity.
- 2.5.24 Based on current installed capacity, there is a shortfall of 2.2 GW of onshore wind resource required to be met by 2030. The Proposed Varied Development and its contribution must be considered in the context of the scale and urgency of the stated Scottish Government policy position.

Delivering the Government's 20 Giga Watt Ambition for Onshore Wind

- 2.5.25 Chapter 2 of the OWPS entitled 'Delivering on our Ambition for Onshore Wind in Scotland' states that the Scottish Government is to form an Onshore Wind Strategic Leadership Group (SLG) and *"will task this SLG with taking forward the aspirations of this policy statement, and the development of an Onshore Wind Sector Deal"*. This reflects the importance of the onshore wind sector.
- 2.5.26 Section 2.3 refers to a "Vision for Onshore Wind in Scotland" and states that Scottish Renewables, on behalf of the sector in Scotland, has produced a Vision Statement which the Government considers *"to lay the basis of a more detailed sector deal that the SLG will develop"*.
- 2.5.27 The Onshore Wind Sector Deal was finalised and published in September 2023 and is referenced further below.
- 2.5.28 The **Vision Statement** is contained within Annex 5 of the OWPS (page 66). A summary of the Vision for the onshore wind industry in Scotland is a future where:
- > An additional 12 GW of new onshore wind generation is constructed by 2030.
 - > Onshore wind continues to play a key role in decarbonising the power sector, reducing consumer costs and ensuring security of supply whilst playing a key role in the electrification of heat and transport.
 - > The selection of wind farm locations and technologies enables the use of the most productive modern turbines and balances the need to respect biodiversity and natural heritage.
 - > Land use for onshore wind is optimised and combined with other initiatives including reforestation and peatland restoration, as well as providing enhanced access to green space for recreation.
 - > High skilled and sustainable jobs are created, including long term jobs in the operational phase.
 - > Material use is optimised, and carbon impact is minimised, through the principles of a circular economy.
 - > Community benefit and shared ownership provides lasting social and economic benefits; and
 - > Onshore wind plays a central role in ensuring a just transition for communities and people.
- 2.5.29 The Vision Statement states (page 67) that:
- "Onshore wind remains vital to meeting this increasing demand, providing fast deployment whilst minimising cost to the consumer. This will be achieved by deploying the most productive modern turbines that are taller than older models, by re-powering existing sites where possible and by maximising the use of our exceptional natural wind resource where environmental effects are acceptable."*

Balancing Environmental Considerations and Benefits

- 2.5.30 Chapter 3 of the OWPS "Environmental Considerations: Achieving Balance and Maximising Benefits" refers to matters relating to specific environmental topics as follows:
- > Shared Land Use;
 - > Peat and Carbon-Rich Soils;
 - > Forestry;

- > Biodiversity;
- > Landscape and Visual Amenity; and
- > Noise.

- 2.5.31 Section 3.3 addresses peat and carbon rich soils. It highlights that approximately 75% of Scotland's peatlands are degraded through drainage, extraction and other actions. It explains that reversing degradation through peatland restoration is central to mitigating and adapting to the linked climate and nature crises.
- 2.5.32 Paragraph 3.3.6 states: *"The continued deployment of onshore wind and restoration of peatlands and carbon rich soil will both play vital roles in delivering Scotland's emissions reductions targets..... Given the established need for additional onshore wind turbines to tackle climate change and to ensure long term availability of cheap, renewable energy, in some cases it may be necessary to construct onshore wind farms on areas of peat".*
- 2.5.33 The document goes on to explain that the onshore wind sector has made remarkable advances over the past decade in mitigation and restoration solutions for peatland. It states that the identification of the condition of existing peatland is a vital part of the wind farm design process and bespoke management plans have an important role. It adds that *"by assessing the net carbon impacts of proposed developments on carbon rich soils and peatlands we will ensure that planning and consenting regimes result in the right projects in the right places, with all applications considered on a case-by-case basis within the relevant planning regime."* (paragraph 3.3.13)
- 2.5.34 Section 3.5 addresses biodiversity and paragraph 3.5.6 states that *"as the rate of onshore wind deployment increases in the coming years, we see a great opportunity for wind energy developments to further contribute significantly to our biodiversity ambition. By proactively managing intact habitats and the species they support, restoring degraded areas and improving connectivity between nature rich areas, onshore wind projects will contribute to our climate change targets and help address the biodiversity crisis".* (paragraph 3.5.6)
- 2.5.35 Landscape and Visual Amenity is addressed at Section 3.6 in Chapter 3 of the OWPS with direct cross references to NPF4. Paragraph 3.6.1 states (original emphasis):

"Meeting our climate targets will require a rapid transformation across all sectors of our economy and society. This means ensuring the right development happens in the right place. Meeting the ambition of a minimum installed capacity of 20 GW of onshore wind in Scotland by 2030 will require taller and more efficient turbines. This will change the landscape."
- 2.5.36 As referenced below, NPF4 policy expressly recognises that significant landscape and visual impacts are to be expected and the OWPS emphasises that as a result there will be changes in Scotland's landscape.
- 2.5.37 Paragraph 3.6.2 of the OWPS, in cross-referencing NPF4, makes it clear that outside of National Parks and National Scenic Areas *"the criteria for assessing proposals have been updated, including stronger weight being afforded to the contribution of the development to the climate emergency, as well as community benefits".*
- 2.5.38 There is therefore express direction of greater weight attaching to the benefits of the development in terms of how it contributes to tackling the climate emergency. The removal of the Spatial Framework for onshore wind farms, as previously required by Scottish Planning Policy (SPP), also gives rise to fewer locational constraints.
- 2.5.39 Paragraph 3.6.5 makes reference to Landscape Sensitivity Studies and makes it clear that these should not be used in isolation to determine matters of acceptability but can be a useful tool in assessing specific sensitivities within an area. It should be noted that the term is now

landscape sensitivity, in comparison with SPP paragraph 162 which encouraged Landscape Capacity Studies. This reflects NatureScot's 2022⁹ guidance.

- 2.5.40 Paragraph 3.6.3 also makes reference to the NPF4 Policy 11 criteria with regard to energy development stating that *"where impacts are localised and/or appropriate design mitigation has been applied, they will generally be considered to be acceptable"*.

Energy Systems & Regulation

- 2.5.41 Chapter 8 of the OWPS deals with 'Onshore Wind, Energy Systems and Regulation'. Section 8.2 refers to network planning and delivery and states:

"Delivering our ambition of 20GW of onshore wind by 2030 will create demands on our electricity infrastructure. New developments will need to connect quickly to Scotland's distribution and transmission networks. Networks must be able to invest quickly and ahead of need in order to ensure swift and efficient connections for onshore wind developments".

- 2.5.42 As noted above, whilst 2030 is a key target date, generation capacity figures are not caps and there will still be a requirement for new generation capacity post 2030. A connection date post 2030 should not diminish the weight to be afforded to the benefits of a Proposed Varied Development.

- 2.5.43 It should also be noted that NPF4 Policy 11 advises that grid capacity should not constrain renewable energy development, therefore any challenges facing developers in getting connected, including delays, are not matters for the planning decision makers to be concerned with.

OWPS Conclusions

- 2.5.44 Page 49 of the OWPS sets out overall conclusions and these include *inter alia* the following key points:

- > Deployment of onshore wind is *"mission critical for meeting our climate targets"*.
- > As an affordable and reliable source of electricity generation, *"we must continue to maximise our natural resource and deliver Net Zero in a way that is fully aligned with, and continues to protect our natural heritage and native flora and fauna"*.
- > A renewed commitment to this technology will ensure we keep *"leading the way in onshore wind deployment and support within the UK"*.
- > The Scottish Government has established *"a clear expectation of delivery with our ambition for a **minimum installed capacity of 20GW** of onshore wind in Scotland by 2030 and providing a vehicle for that delivery through the creation of [the] Onshore Wind Strategic Leadership Group"* (emphasis added).

- 2.5.45 It is stated that *"Onshore wind will remain an essential part of our energy mix and climate change mitigation efforts, but we are also in a nature crisis. Onshore wind farms must strike the right balance in how we care for and use our land..."*.

- 2.5.46 The term "mission critical" is strong language and indicates onshore wind is crucial and extremely important to the attainment of the Government's policy and legislative objectives. This is fundamentally different policy language to that contained within National Planning Framework 3 (NPF3) and SPP.

The Onshore Wind Sector Deal

- 2.5.47 The Onshore Wind Sector Deal (the 'Sector Deal') for Scotland was finalised in September 2023. It sets out a series of key measures which will support the Scottish Government in reaching its target of 20 GW of onshore wind by 2030. It describes how the Scottish

⁹ NatureScot, Landscape Sensitivity Assessment Guidance, paragraph 8 (2022).

Government, and the onshore wind sector will work together to deliver onshore wind farms quickly, sustainably and to the benefit of local communities and with the overall objective of attaining Scotland's Net Zero target.

2.5.48 The Foreword sets out that:

"The Government is committed to working with developers and stakeholders, understanding the operational barriers to delivering onshore wind projects and setting out processes to help reduce them. We also commit to speeding up consenting decisions, working with planning authorities and statutory consultees to increase skills and resources, as well as streamlining approaches.

Jointly, we will work together on ensuring a balance is struck between onshore wind and the impacts on land use and the environment. We will collaborate to enable information to be collected and shared from monitoring and evidence purposes, and we jointly want to capitalise on the unique opportunity for Scotland to become a world leader in decommissioning, re-manufacturing and recycling of onshore wind assets."

2.5.49 It further adds that:

"The Sector Deal is more than just a document; it is a testament to our determination, a celebration of our potential, and a promise to future generations. Let us work together to usher in an era where innovation, sustainability, and prosperity converge, as we power Scotland's greener future through the boundless energy of onshore wind."

2.5.50 The matters within the Sector Deal to be actioned by a collaborative approach and also by specific actions from the sector and Government relate to:

- > Supply chain, skills and the circular economy;
- > Community and benefits;
- > Land use and the environment;
- > Planning;
- > Legislative and regulatory actions; and
- > Technical actions.

2.5.51 In terms of land use and the environment, the Sector Deal sets out that NPF4 Policy 1 makes it clear that significant weight needs to be given to the global climate and nature crisis and that *"New onshore wind projects in Scotland will enhance biodiversity and optimise land use and environmental benefits"* (page 11).

2.5.52 It further adds that:

"Balancing the need for more wind farms with the safeguards defined in NPF4 will be a crucial aspect of achieving the 2030 onshore wind ambition. Scotland will continue to be a world leader in responsible onshore wind development, demonstrating how onshore wind can co-exist with a diversity of species, sensitive habitats, peatland, carbon rich soils and forestry, ensuring positive outcomes for the climate and nature."

2.5.53 In terms of planning, a key matter is that there is an ambition to reduce the time it takes to determine Section 36 applications. The Sector Deal also states (page 13) in relation to planning that:

"The ambition of 20 GW of installed onshore wind capacity by 2030 will require a significant number of new sites, the repowering and extension of existing sites and the realisation of unbuilt consented sites. Meeting this ambition will require the determination of applications to be made much more quickly than in recent years."

The Draft Energy Strategy and Just Transition Plan

- 2.5.54 The Scottish Government published a new Draft 'Energy Strategy and Just Transition Plan' entitled 'Delivering a fair and secure zero carbon energy system for Scotland' on 10 January 2023. The new Strategy is to replace the one previously published in 2017. The consultation period ended in April 2023. As a draft document it can only be afforded limited weight. The draft document is however consistent with the adopted policy set out in NPF4 and the identification of the 2020s as a crucial decade for the large-scale delivery of renewable energy projects supporting urgent transition to Net Zero.
- 2.5.55 The Ministerial Foreword states:
- "The imperative is clear: in this decisive decade, we must deliver an energy system that meets the challenge of becoming a Net Zero nation by 2045, supplies safe and secure energy for all, generate economic opportunities, and builds a just transition..."*
- The delivery of this draft Energy Strategy and Just Transition Plan will reduce energy costs in the long term and reduce the likelihood of future energy cost crises....*
- It is also clear that as part of our response to the climate crisis we must reduce our dependence on oil and gas and that Scotland is well positioned to do so in a way that ensures we have sufficient, secure and affordable energy to meet our needs, to support economic growth and to capture sustainable export opportunities....*
- For all these reasons, this draft Strategy and Plan supports the fastest possible just transition for the oil and gas sector in order to secure a bright future for a revitalised North Sea energy sector focused on renewables."*
- 2.5.56 The Foreword adds that the draft Strategy sets out key ambitions for Scotland's energy future including:
- > **More than 20 GW of additional renewable electricity on and offshore by 2030** (emphasis added).
 - > Accelerated decarbonisation of domestic industry, transport and heat.
 - > Generation of surplus electricity, enabling export of electricity and renewable hydrogen to support decarbonisation across Europe.
 - > Energy security through development of our own resources and additional energy storage.
 - > A just transition by maintaining or increasing employment in Scotland's energy production sector against a decline in North Sea production.
- 2.5.57 The draft Strategy states (page 7, Executive Summary) that the vision for Scotland's energy system is:
- "...that by 2045 Scotland will have a flourishing, climate friendly energy system that delivers affordable, resilient and clean energy supplies for Scotland's households, communities and business. This will deliver maximum benefit for Scotland, enabling us to achieve a wider climate and environmental ambitions, drive the development of a wellbeing economy and deliver a just transition for our workers, businesses, communities and regions.*
- In order to deliver that vision, this Strategy sets out clear policy positions and a route map of actions with a focus out to 2030".*
- 2.5.58 A fundamental part of the Strategy is expanding the energy generation sector. The Executive Summary states (page 8) that Scotland's renewable resources mean that:
- "....we can not only generate enough cheap green electricity to power Scotland's economy, but also export electricity to our neighbours, supporting jobs here in Scotland and the decarbonisation ambitions of our partners.*

We are setting an ambition of more than 20 GW of additional low-cost renewable electricity generation capacity by 2030, including 12 GW of onshore wind....

An additional 20 GW of renewable generation will more than double our existing renewable generation capacity by 2030....."

Recognition of the role of Battery Storage

2.5.59 With regard to the potential of battery storage the draft strategy recognises:

"Batteries can be combined to provide energy storage: In a domestic setting supporting the energy efficiency of individual homes; In communities and neighbourhoods, supporting the energy efficiency of the local low energy network; In strategic locations and through aggregating a large number of fixed and vehicle batteries to support regional energy and grid balancing a high energy network".

2.5.60 Furthermore, it adds:

"Utility scale battery storage offers fast responding, dispatchable power when required. As of September 2021, only 124 MW of the total 864 MW of energy storage was provided by Battery Energy Storage Systems (BESS) capacity installed in Scotland. However, there is a further 2.1GW that has secured planning permission. Typically, these systems use lithium-ion technology, and only contain energy to dispatch full power continuously for a short number of hours. They also provide a number of ancillary services required to maintain stability within the electricity networks". (Page 130).

2.5.61 The Draft Strategy reiterates the support for energy storage set out in NPF4 (page 130).

2.5.62 The Draft Strategy further recognises the potential contribution BESS can make to achieving Net Zero in summarising the key areas where it is considered that the UK Government needs to take action to support the delivery of the strategy with particular regard to energy system flexibility stating: *"We urge the UK Government to make ancillary markets more accessible for Battery Energy Storage Systems (BESS) and other low carbon technologies ahead of fossil fuel powered alternatives".*

The Green Industrial Strategy

2.5.63 The Scottish Government published a Green Industrial Strategy ('GIS') in September 2024. The Executive Summary sets out the mission of the GIS, namely:

"This Green Industrial Strategy's mission is to ensure that Scotland realises the maximum possible economic benefit from the opportunities created by the global transition to Net Zero".

2.5.64 The GIS sets out five opportunity areas for Scotland where identified strengths are most likely to lead to growth and the potential to grow Scotland's exports. The sectors relate to Scotland's wind economy, carbon capture and storage, supporting the green economy by way of professional and financial services, growing the hydrogen sector and establishing Scotland as a competitive centre for clean energy intensive industries of the future.

2.5.65 Page 6 sets out that the GIS forms a key part of the Government's broader National Strategy for Economic Transformation. It states that *"It also links explicitly to our Just Transition Plans which describe how the transition to Net Zero in the most emitting sectors will be achieved in a way that delivers economic, social and community benefits, including fair work, environmental preservation and reduced poverty and inequality."*

2.5.66 The first of the five opportunity areas is in relation to 'maximising Scotland's wind economy'. It states that this:

"is about making the most of our natural resources, established onshore and offshore wind sectors and first-mover advantage in floating offshore wind to generate clean electricity; participating in global supply chains as well as expanding our domestic supply chain capacity and seizing opportunities across the offshore wind supply chain, from infrastructure to

manufacturing; positioning Scotland as a leader in material circularity of wind turbines and components."

2.5.67 Actions include *inter alia*:

- > Supporting investment to improve essential infrastructure, expanding supply chains and secure manufacturing opportunities;
- > Developing and maintaining a pipeline of investment propositions backed by clear information about the timing and nature of renewable energy opportunities;
- > Delivering planning and consenting systems which enable Scotland's Net Zero development pipeline; and
- > Exploring the circularity opportunity in onshore wind.

2.5.68 Page 13 states clearly that the single goal of the GIS is to help Scotland realise economic growth opportunities from the global transition to Net Zero.

2.5.69 Onshore wind is referred to in some detail at page 21 where the GIS states:

"Onshore wind is the biggest single technology in Scotland's current mix of renewable electricity generation, comprising 62% of installed capacity.

A thriving onshore wind sector is therefore critical to the decarbonisation in Scotland and the UK. As set out in our 2022 Onshore Wind Policy Statement, Government and industry are focused on delivering at least 20 GW of onshore wind by 2030 (doubling current capacity) and recent pipeline analysis shows that we should be on track to deliver this.

This trajectory is underpinned by the Onshore Wind Sector Deal which sets out a set of specific collaborative actions which include commitments by both the Scottish Government and the onshore wind industry to help deliver the 20 GW ambition.

A supportive policy environment and successful industry collaboration via the Onshore Wind Strategic Leadership Group confirms the shared commitment of Government and industry to achieve this successful and responsible growth.

The onshore wind workforce is highly skilled and opportunities in installation, consulting, operations and maintenance are anticipated to rise in response to growth ambitions. Specialised engineering consultancy services such as wind farm design and financial due diligence related to onshore developments are expected to grow and offer additional export potential. There is commercial opportunity in circular supply chains related to the UK wind industry. Scotland's established, and now ageing onshore wind assets may also offer opportunities for innovative solutions in remanufacturing, recycling, and decommissioning end of life assets."

2.5.70 It is clear therefore that to progress the Government's objectives with regard to wind energy there needs to be clear support for new investment and growth in onshore wind development. Realising the economic and social opportunities will only be achieved through the development and consenting of additional wind energy developments. Such deployment will not only be critical towards achieving the Net Zero target, given the important contribution that wind energy will make in that regard but will also help deliver the Government's clear green infrastructure mission.

Scotland's Climate Change Plan

2.5.71 The Scottish Government published 'Scotland's Climate Change Plan – 2026-2040' ('CCP') on 25 March 2026. The CCP sets out the policies and proposals the Scottish Government will take forward to enable the carbon budgets set out in legislation to be met. The carbon budgets have been set in line with the levels proposed by the CCC in May 2025, referred to above, and provide a clear pathway towards Scotland achieving net zero by 2045.

2.5.72 The Carbon budgets are:

- > 57% lower than 1990 levels for the First Carbon Budget (2026 to 2030).
- > 69% lower than 1990 levels for the Second Carbon Budget (2031 to 2035).
- > 80% lower than 1990 levels for the Third Carbon Budget (2036 to 2040).
- > 94% lower than 1990 levels for the Fourth Carbon Budget (2041 to 2045).

2.5.73 The CCP confirms that Scotland remains committed to achieving net zero GHG emissions by 2045 at the latest and that as of 2023, Scotland had reduced emissions by 51.3% since 1990 — the largest reduction in the UK.

2.5.74 The CCP notes that the key driver of the transition to date has been the transformation in the way energy is generated - from coal and gas to a thriving renewables sector. In 2023, 70% of electricity generated in Scotland was from renewable sources. It acknowledges the opportunity the transition to net zero provides in terms of growing the economy, noting that the net zero transition can support significant economic opportunities for Scotland.

2.5.75 The CCP sets out sectoral policies relating to a range of sectors, which are prescribed in legislation, including energy supply, agriculture and transport, amongst others. Key policies and actions have been set out for each sector to meet the carbon budgets.

2.5.76 Annex 2 of the CCP contains the Sectoral Annexes which support the CCP. Energy supply is one of the key areas of focus. At page 84, the document sets out the vision for Scotland stating that:

“By 2035, we will have expanded our renewable capacity significantly to meet the increasing demand as other sectors decarbonise. We already have an ambition to have delivered 20GW of onshore wind by 2030 and in January 2026, we published the ‘Offshore Wind Policy Statement 2020 update: Scotland’s Offshore Wind Ambition’. This set out an increased offshore wind ambition for Scotland of up to 40GW of new offshore wind capacity by 2040.”

2.5.77 It adds that as we transition to net zero and reduce reliance on fossil fuel generation “energy storage will play a larger role in ensuring a secure and resilient electricity system by providing a reliable and flexible electricity supply.” (page 84, Annex 2)

2.5.78 One of the actions identified to achieve the vision of emissions reduction for the energy generation sector means “moving to an electricity system in which the residual amount of unabated gas is displaced by low carbon and renewable sources. To deliver this target, whilst ensuring a safe and secure supply, we must grow our renewables capacity, including from offshore and onshore wind, and solar.” (Page 89, Annex 2) (emphasis added).

2.5.79 The publication of the CCP demonstrates the continued commitment and needs case for delivering additional renewable energy capacity. One can take from that that the associated need for reinforced / new transmission infrastructure to achieve net zero is in turn strengthened.

2.6 Conclusions on the Renewable Energy Policy & Legislative Framework

2.6.1 It is considered that the Proposed Varied Development is very strongly supported by the climate change and renewable energy policy and legislative framework.

2.6.2 The trajectory, in terms of the scale and pace of action required to reduce emissions, grows ever steeper and it is essential that rapid progress is made otherwise the legally binding target in Scotland of Net Zero by 2045 will not be met.

2.6.3 It is clear from the UK Energy White Paper and the forecasts by the CCC that electricity demand is expected to grow substantially (scenarios vary but potentially by a factor of three or four) as carbon intensive sources of energy are displaced by electrification of other industry sectors, particularly heat and transport.

- 2.6.4 The change from annual Scottish emission reduction targets has served to show that we are not on track to attain Net Zero and it strengthens the case for rapidly approving schemes that can contribute to this goal. The overall target of Net Zero remains unchanged.
- 2.6.5 Decisions through the planning and wider consenting system must be responsive to this position. Decision makers can do this by affording substantial weight to the energy policy objectives articulated above, in the planning balance in a given case.
- 2.6.6 In terms of the energy policy considerations, it is helpful to reference the recent position of the Scottish Ministers with regard to a Section 36 wind farm decision. Section 36 consent was granted by the Scottish Ministers on 09 May 2025 for the Chrathaich Wind Farm¹⁰. From paragraph 90 et seq of the Decision Notice, the Scottish Ministers in commenting on the acceptability of the development stated:
- “As set out above, the seriousness of climate change, its potential effects and the need to cut carbon dioxide emissions, remain a priority for the Scottish Ministers. Scotland’s renewable energy targets and climate change ambitions, energy policies and planning policies are all relevant considerations when weighing up this proposed development. NPF4, Scotland’s Energy Strategy and the Onshore Wind Policy Statement (“OWPS”) make it clear that renewable energy deployment remains a priority of the Scottish Government. These are all matters which should be afforded significant weight in favour of the Proposed Development”.*
- The transition to a low carbon economy is an opportunity for Scotland to take advantage of our natural resources to grow low carbon industries and create jobs.*
- The Scottish Ministers are satisfied that the deployment of this amount of renewable energy the proposed Development could generate is entirely consistent with the Scottish Government’s policy on the promotion of renewable energy and its target date for net zero emissions of all greenhouse gases by 2045.”*
- 2.6.7 In the Bankend Rig III Section 36 decision¹¹ (November 2025), the Scottish Ministers set out their position with regard to the OWPS. At paragraph 104 they state:
- “The OWPS reaffirms the vital role for onshore wind in meeting Scotland’s energy targets within the context of the Scottish Government’s 2045 net zero emissions commitment. The OWPS sets out the Scottish Government’s position for the ongoing need for more onshore wind development and capacity in locations across Scotland where it can be accommodated in appropriate locations. OWPS also seeks to maximise the benefits from onshore wind to ensure that Scotland’s citizens have access to affordable, low carbon and renewable energy whilst tackling the climate and nature crises in tandem.*
- The Scottish Ministers are satisfied that the proposed development will provide a contribution to renewable energy targets and carbon savings in support of the ambitions of the SES and OWPS.”*
- 2.6.8 In the most recent renewable energy policy documents referred to, there is a consistent and what might be termed a ‘green thread’, which ties a number of related policy matters together: namely the urgent challenge and imperative of attaining and sustaining net zero and the need to substantially increase renewable capacity, notably onshore wind.
- 2.6.9 The OWPS, draft Energy Strategy, Clean Power 2030 and the CCP form part of the strengthened policy approach alongside NPF4. These documents confirm the Scottish Government’s policy objectives and related targets, reaffirming the important role that onshore wind will play in response to the climate crisis which is at the heart of all these policies.
- 2.6.10 The energy yield of the Consented Development can be significantly increased by approximately 53% by increasing the height of the proposed turbines, in the Proposed Varied Development. The increase in turbine height, together with the reduction in turbine numbers,

¹⁰ Scottish Ministers (2025) Chrathaich Wind Farm Decisions Notice ECU Reference ECU00004704.

¹¹ Scottish Ministers (2025) Bankend Rig III Wind Farm Decision ECU Reference ECU00004516 .

would only result in limited changes to environmental effects, as is explained in Chapter 4 of the Planning Statement and within the EIA Report.

- 2.6.11 The increased yield would enable the Proposed Varied Development to make a greater contribution to UK and Scottish Government climate change and renewable energy targets and commitments.
- 2.6.12 It must follow that the need case for the Proposed Varied Development is to be afforded substantial weight in the planning balance. The way that decision makers can do that is by properly recognising the seriousness and importance of energy policy related considerations in the planning balance, and the contribution of the Proposed Varied Development to meeting net zero and low carbon energy targets. It is the cumulative effect of a large number of individual projects which will move Scotland towards where it needs to be in order to attain net zero.

3. The Benefits of the Proposed Varied Development

3.1 The Benefits: Summary

3.1.1 This Chapter summarises the benefits that would arise from the Proposed Varied Development.

Renewable Energy Generation & Emissions Savings

- > The Applicant has calculated that the energy yield of the Consented Development can be significantly increased by approximately 53% by increasing the height of the proposed turbines. This increase in turbine height, together with the reduction in turbine numbers, would only result in limited changes to environmental effects, with the benefit of an additional 6.8 MW generating capacity when compared to that of the Consented Development.
- > With a wind energy generating capacity of up to 77 MW of onshore wind and 50 MW of BESS¹² the Proposed Varied Development would make a valuable and important contribution to the attainment of the UK and Scottish Government policies of encouraging renewable energy developments; and in turn contribute to the achievement of UK and Scottish Government renewable energy and net zero targets. As explained, there is now a distinct shift in policy emphasis from the displacement of higher carbon electricity generation to extending the use of electricity as the critical energy response to the climate emergency.
- > Based on the Proposed Varied Development's location and estimated capacity factor, the annual indicative total electricity output for the site would be 241,340 mega-watt hours ('MWh') per annum. The Proposed Varied Development would generate enough electricity to power approximately 76,860 average Scottish households.
- > The UK legally binding target of net zero GHG emissions by 2050 and the Scottish Government target of net zero by the earlier date of 2045 are major challenges, as explained in the previous Chapter. The Scottish Government has made it clear that onshore wind plays a vital and indeed "*mission critical*" role in the attainment of future targets in relation to helping to combat the crisis of global heating.
- > The Proposed Varied Development is estimated to save 113,017 tonnes of CO₂e per year, through the displacement of grid electricity, based on the current fossil fuel grid mix. This equates to over 4.5 million tonnes of CO₂e over the Proposed Varied Development's 40-year operational lifetime.
- > The estimated payback time of the Proposed Varied Development, using the Scottish Government Carbon Calculator, is 1.5 years, with a minimum/maximum range of 0.7 to 1.9 years, based on the fossil fuel mix of the electricity grid. 1.5 years is around 4% of the anticipated lifespan of the Proposed Varied Development. Compared to fossil fuel electricity generation projects, which also produce embodied emissions during the construction phase and then significant emissions during operation due to combustion of fossil fuels, the Proposed Varied Development has a low carbon footprint, and after 1.5 years the electricity generated is estimated to be carbon neutral and will displace grid electricity generated from fossil fuel sources or directly displace fossil fuel use for transport and heating.

¹² It is noted that although the Proposed Varied Development comprises 127 MW of renewable energy, no more than 84.6 MW will be exported to the grid at any one time. This is limited by grid connection capacity.

- > The earlier that steps towards decarbonisation are introduced, the greater their contribution to limiting climate change. The Proposed Varied Development's delivery of renewable capacity in the near term will have a disproportionately higher benefit than the same capacity delivered later.

Security of Supply & Battery Storage

- > The British Energy Security Strategy has been referenced. It provides an increase to the requirements for both the scale and the urgency of delivery of new low carbon generation capacity, by refocussing the requirement for low-carbon power for reasons of national security of supply and affordability, as well as for decarbonisation.
- > With this context, the attractiveness of onshore wind, as a proven technology which will deliver significant benefits to consumers through decarbonisation, security of supply and affordability this decade, becomes clear.
- > The Proposed Varied Development, if consented, would provide a valuable contribution to security of supply for the wider region, Scotland and for the wider Great Britain (GB) area. Consenting the development, would contribute to an adequate and dependable Scottish and GB generation mix, through enabling the generation of more low carbon power from indigenous and renewable resources, and would enable the Proposed Varied Development to make a significant contribution to Scottish and wider UK energy security and decarbonisation needs.
- > BESS will play a vital role in ensuring the full potential capacity of existing and future renewable energy generation is exploited and the successful transition to a net-zero future. BESS imports renewable energy when supply is typically at its highest and in excess of demand, storing it, and then exporting it back to the grid when demand is high, but supply is low (e.g. still, cloudy days).
- > Increasing the capacity of the BESS from 6 MW to 50 MW allows for greater storage of excess energy generated during peak wind periods. This enhances the flexibility and reliability of the Proposed Varied Development by ensuring a steady supply of power even when wind generation is low. The increased storage capacity helps to balance supply and demand, enhancing the overall grid stability.
- > Furthermore, the BESS also has the potential to supply the grid with essential energy security functions including:
 - **Voltage support services:** Batteries can supply the network with quickly dischargeable energy during low voltage periods or blackouts; to date these scenarios have typically been managed by reliance on quickly dispatchable fossil fuel energy generators (typically gas peaking plants); and
 - **Grid stabilisation services (inertia):** Inertia is incredibly important for the stable operation of the electricity system; it is a by-product of coal and gas-fired generators, however renewables like wind and solar are not able to provide inertia. As older coal and gas plants come off the system and renewable energy generation becomes the dominant source of energy nationally, we need to find new ways to provide grid stability. BESS are able to provide these stability services.

Socio-Economic Benefits

3.1.2

The Proposed Varied Development would support jobs during construction and during operation across the Scottish economy. Overall, the socio-economic effects of the capital investment, employment and overall value to the economy would be beneficial (short term during construction, long term during operation). A **Socio-Economic Impact Assessment of Shepherds' Rig Wind Farm** is submitted in support of the application. The predicted economic benefits are greater than those associated with the Consented Development. A summary of the key impacts are as follows:

- > The Proposed Varied Development will deliver a series of economic benefits during its construction and development phase, namely:
 - £8.8 million Gross Value Added ('GVA') and 100 years of employment in Dumfries and Galloway; and
 - £37.5 million GVA and 430 years of employment in Scotland.
- > The annual expenditure for the operation and maintenance of the Proposed Varied Development could deliver up to (including direct, indirect and induced impacts):
 - £1.2 million GVA and <10 jobs in Dumfries and Galloway;
 - £2.9 million GVA and 20 jobs in Scotland.
- > The Proposed Varied Development will also support the delivery of local services through the annual payment of at least £1.6 million in non-domestic rates, anticipated to accumulate to around £65.1 million across its 40-year operational lifespan
- > The Proposed Varied Development will support local economic activity: To maximise the local benefits of contracts associated with the Proposed Varied Development, the Applicant has committed to raising awareness of upcoming contracts to allow sufficient time for local suppliers to prepare and compete in the tendering process, creating a register of local contractors, and actively encouraging Tier 1 suppliers to use and hire local businesses in alignment with the Applicant's 'Responsible Procurement Charter'.
- > The Applicant has also committed to hosting a minimum of one 'Meet the Buyer' event per project and exploring opportunities to collaborate with Dumfries & Galloway Chamber of Commerce to explore local capabilities on a more generalised basis.
- > To support skills development, the Applicant has committed to providing three scholarships of £3,000 per year for students from households within Dumfries and Galloway to support Science Technology Engineering and Mathematics ('STEM') subjects and construction skills.
- > All the above would ensure a **contribution to the maximisation of the local supply chain content** and provide **opportunities for local employment**.

Community Benefits

- > The Applicant has committed to a community benefit fund in line with Scottish Government guidance which can support local ambitions and needs.
- > The Applicant has committed to offering a community benefit fund of at least the recommended value, expected to be published later this year by the Scottish Government¹³.
- > The Proposed Varied Development could generate up to £385,000 per annum to support local groups and projects in the areas surrounding the site. This marks an increase of £34,000 per annum from the Consented Development. With the proposed increase of operational lifetime of the Proposed Varied Development from 30 to 40 years, this would equate to an additional £4.87 million over the Proposed Varied Development's lifetime compared to the Consented Development.
- > Depending on the initiatives and projects brought forward by the local communities, these could provide positive benefits to the local economy, local facilities and the general quality of life for local residents.
 - The Applicant is keen to ensure that part of this funding supports affordable energy solutions, ensuring neighbouring communities benefit directly from locally produced

¹³ Scottish Government (2026), Refreshing the Good Practice Principles for Community Benefits from Onshore Renewable Energy – a Working Paper.

energy. These solutions could include the installation of solar panels, or other kinds of generation assets, with the intention of expanding to a larger geography over time.

- > It is understood that community benefit is not a material planning consideration, however the Applicant is committed to offering a package of community benefits.

Biodiversity Enhancement

- > Significant biodiversity enhancements are proposed as set out in an Outline Habitat Enhancement and Management Plan ('OHEMP') (**Appendix 9.8 of the EIA Report**). In summary, the details of the proposed measures relating to biodiversity enhancement are as follows and are further discussed in Chapter 4 in the context of NPF4 Policy 3 biodiversity. The measures proposed offer opportunities for interrelated environmental enhancements at the site with respect to peat, biodiversity and forestry. Key features of the OHMP include:
 - restoring approximately 66.75 ha of degraded blanket bog habitat by removing conifer plantations and implementing measures such as furrow blocking and ground smoothing;
 - creating and managing dry heath and acid grassland habitats;
 - establishing over 35 ha of native broadleaved woodland, enhancing over 11 ha of riparian zones to improve connectivity; and
 - installing fencing to protect young trees.

4. Appraisal against NPF4

4.1 Introduction

4.1.1 NPF4 was approved by resolution of the Scottish Parliament on 11 January 2023 and came into force on 13 February 2023.

4.1.2 A Chief Planner's Letter was issued on 8 February 2023 entitled 'Transitional Arrangements for National Planning Framework 4'. It contains advice intended to support consistency in decision making ahead of new style Local Development Plans being in place.

Development Management

4.1.3 NPF4 forms part of the statutory Development Plan since its adoption and publication. For the purposes of Section 36 decision making, acknowledging that Section 25 of the 1997 Act is not engaged, NPF4 is a significant material consideration in the overall decision-making process.

4.1.4 Section 13 of the Planning (Scotland) Act 2019 Act ('the 2019 Act') amends Section 24 of the 1997 Act regarding the meaning of the statutory 'development plan', such that for the purposes of the 1997 Act, the Development Plan for an area is taken as consisting of the provisions of:

- > The National Planning Framework; and
- > Any LDP.

4.1.5 The statutory Development Plan covering the site consists of NPF4 and the DGC LDP (2019).

4.1.6 A key provision of the 2019 Act is that in the event of any incompatibility between a provision of NPF4 and a provision of an LDP, then whichever of them is the later in date will prevail. In this case NPF4 is the later document.

How NPF4 is to be used

4.1.7 Annex A (page 94) of NPF4 explains how it is to be used. It states:

"The purpose of planning is to manage the development and use of land in the long-term public interest ... Scotland in 2045 will be different. We must embrace and deliver radical change so we can tackle and adapt to climate change, restore biodiversity loss, improve health and wellbeing, reduce inequalities, build a wellbeing economy and create great places."

4.1.8 Annex A states that NPF4 is required by law to set out the Scottish Ministers' policies and proposals for the development and use of land. It adds:

"It plays a key role in supporting the delivery of Scotland's national outcomes and the United Nations Sustainable Development Goals¹⁴. NPF4 includes a long-term spatial strategy to 2045."

4.1.9 NPF4 contains a spatial strategy and Scottish Government development management policies are to be applied in all consenting decisions, and it identifies national developments which are aligned to the strategic themes of the Government's Infrastructure Investment Plan¹⁵ (IIP).

4.1.10 NPF4 therefore for the first time, introduces centralised development management policies which are to be applied Scotland wide.

¹⁴ The 17 UN Sustainable Development Goals are set out at page 95 of NPF4 and include *inter alia* 'affordable and clean energy' and 'climate action'.

¹⁵ The Scottish Government's five-year Infrastructure Investment Plan (2021-22 to 2025-26) was published in February 2021. It set out a vision for Scotland's future infrastructure in order to support and enable an inclusive Net Zero emissions economy.

4.1.11 Annex A adds that NPF4 is required by law to contribute to six outcomes. These relate to meeting housing needs, health and wellbeing, population of rural areas, addressing equality and discrimination and also, of particular relevance to the Development *"meeting any targets relating to the reduction of emissions of greenhouses gases, and, securing positive effects for biodiversity"*.

4.2 The National Spatial Strategy – Delivery of Sustainable Places

4.2.1 Part 1 of NPF4 sets out the Spatial Strategy for Scotland to 2045 based on six spatial principles which are to influence all plans and decisions. The introductory text to the Spatial Strategy starts by stating (page 3):

"The world is facing unprecedented challenges. The global climate emergency means that we need to reduce greenhouse gas emissions and adapt to the future impacts of climate change."

4.2.2 The principles are stated as playing a key role in delivering the United Nations Sustainable Development Goals and the Scottish Government's National Performance Framework¹⁶.

4.2.3 The Spatial Strategy is aimed at supporting the delivery of:

- > 'Sustainable Places': "where we reduce emissions, restore and better connect biodiversity";
- > 'Liveable Places': "where we can all live better, healthier lives"; and
- > 'Productive places': "where we have a greener, fairer and more inclusive wellbeing economy".

4.2.4 Page 6 of NPF4 addresses the delivery of sustainable places. Reference is made to the consequences of Scotland's changing climate, and it states, *inter alia*:

"Scotland's Climate Change Plan, backed by legislation, has set our approach to achieving Net Zero emissions by 2045, and we must make significant progress towards this by 2030.....Scotland's Energy Strategy will set a new agenda for the energy sector in anticipation of continuing innovation and investment."

4.2.5 The new Energy Strategy and Just Transition Plan for Scotland (as referenced in NPF4) was published as a consultative draft on 10 January 2023 (see below).

4.2.6 The National Spatial Strategy in relation to 'sustainable places' is described (page 7) as follows:

"Scotland's future places will be Net Zero, nature-positive places that are designed to reduce emissions and adapt to the impacts of climate change, whilst protecting, recovering and restoring our environment."

Meeting our climate ambition will require a rapid transformation across all sectors of our economy and society. This means ensuring the right development happens in the right place."

Every decision on our future development must contribute to making Scotland a more sustainable place. We will encourage low and zero carbon design and energy efficiency, development that is accessible by sustainable travel, and expansion of renewable energy generation."

4.2.7 Six National Developments ('NDs') support the delivery of sustainable places, one being 'Strategic Renewable Electricity Generation and Transmission Infrastructure'.

4.2.8 A summary description of that ND is provided at page 7 of NPF4 as follows:

"Supports electricity generation and associated grid infrastructure throughout Scotland, providing employment and opportunities for community benefit, helping to reduce emissions and improve security of supply".

¹⁶ The Scottish Government National Performance Framework sets out 'National Outcomes' and measures progress against a range of economic, social and environmental 'National Indicators'.

- 4.2.9 Page 8 of NPF4 sets out 'Cross-cutting Outcome and Policy Links' with regard to reducing greenhouse gas emissions. It states:

"The global climate emergency and the nature crisis have formed the foundations for the spatial strategy as a whole. The regional priorities share opportunities and challenges for reducing emissions and adapting to the long-term impacts of climate change, in a way which protects and enhances our natural environment."

- 4.2.10 A key point in this statement is that the climate emergency and nature crisis are expressly stated as forming the foundations of the national spatial strategy. Recognising that tackling climate change and the nature crisis is an overriding imperative which is key to the outcomes of almost all policies within NPF4.

4.3 National Developments

Overview

- 4.3.1 Page 97 of NPF4 sets out that 18 National Developments have been identified. These are described as:

"significant developments of national importance that will help to deliver the spatial strategy ... National development status does not grant planning permission for the development and all relevant consents are required".

- 4.3.2 It adds that:

"Their designation means that the principle for development does not need to be agreed in later consenting processes, providing more certainty for communities, businesses and investors. ... In addition to the statement of need at Annex B, decision makers for applications for consent for national developments should take into account all relevant policies".

- 4.3.3 Annex B of NPF4 sets out the various NDs and related Statements of Need. It explains that NDs are significant developments of national importance that will help to deliver the Spatial Strategy. It states (page 99) that:

"The statements of need set out in this annex are a requirement of the Town and Country Planning (Scotland) Act 1997 and describe the development to be considered as a national development for consent handling purposes".

National Development 3 "Strategic Renewable Electricity Generation and Transmission Infrastructure"

- 4.3.4 Page 103 of NPF4 describes ND3 and it states:

"This national development supports renewable electricity generation, repowering, and expansion of the electricity grid.

A large and rapid increase in electricity generation from renewable sources will be essential for Scotland to meet its Net Zero emissions targets. Certain types of renewable electricity generation will also be required, which will include energy storage technology and capacity, to provide the vital services, including flexible response, that a zero carbon network will require. Generation is for domestic consumption as well as for export to the UK and beyond, with new capacity helping to decarbonise heat, transport and industrial energy demand. This has the potential to support jobs and business investment, with wider economic benefits.

The electricity transmission grid will need substantial reinforcement including the addition of new infrastructure to connect and transmit the output from new on and offshore capacity to consumers in Scotland, the rest of the UK and beyond. Delivery of this national development will be informed by market, policy and regulatory developments and decisions."

- 4.3.5 The location for ND3 is set out as being all of Scotland and in terms of need it is described as:

"Additional electricity generation from renewables and electricity transmission capacity of scale is fundamental to achieving a Net Zero economy and supports improved network resilience in rural and island areas."

- 4.3.6 Reference is made to the designation and classes of development which would qualify as ND3, and it states in this regard:

"A development contributing to 'Strategic Renewable Electricity Generation and Transmission' in the location described, within one or more of the Classes of Development described below and that is of a scale or type that would otherwise have been classified as 'major' by 'The Town and Country Planning (Hierarchy of Developments) (Scotland) Regulations 2009', is designated a national development:

(a) on and off shore electricity generation, including electricity storage, from renewables exceeding 50 megawatts capacity; (emphasis added)

(b) new and/or replacement upgraded on and offshore high voltage electricity transmission lines, cables and interconnectors of 132kv or more; and

(c) new and/or upgraded Infrastructure directly supporting on and offshore high voltage electricity lines, cables and interconnectors including converter stations, switching stations and substations."

- 4.3.7 The Proposed Varied Development, with an installed capacity of onshore wind and storage of over 50 MW, has national development status. The Proposed Varied Development is therefore of national importance for the delivery of the national Spatial Strategy set out in NPF4.

- 4.3.8 The Spatial Strategy requires a *"large and rapid increase"* in electricity generation from renewables and the National Spatial Strategy makes it clear (NPF4, page 6) that *"we must make significant progress"* by 2030.

- 4.3.9 NPF4 makes it clear that there is a need for wind farms of 'scale'¹⁷. This links to the express acknowledgement in NPF4 Policy 11 (see below) that some significant effects are inevitable.

4.4 National Planning Policy

- 4.4.1 Part 2 of NPF4 (page 36) addresses national planning policy by topic with reference to three themes formulated with the aim of delivering sustainable, liveable and productive places.

- 4.4.2 In terms of planning, development management and the application of the national level policies, NPF4 states (page 98):

"The policy sections are for use in the determination of planning applications. The policies should be read as a whole. Planning decisions must be made in accordance with the development plan unless material considerations indicate otherwise. It is for the decision maker to determine what weight to attach to policies on a case by case basis. Where a policy states that development will be supported, it is in principle, and it is for the decision maker to take into account all other relevant policies".

- 4.4.3 In terms of "sustainable places" relevant policies to the Proposed Varied Development include the following:

- > Policy 1: Tackling the climate and nature crises;
- > Policy 3: Biodiversity;
- > Policy 4: Natural places;
- > Policy 5: Soils;

¹⁷ The NPF4 Statement of Need for National Developments states that additional electricity generation "of scale" is fundamental to achieving a Net Zero economy (NPF4, page 103).

- > Policy 6: Forestry, woodland and trees
- > Policy 7: Historic assets and places; and
- > Policy 11: Energy.

4.4.4 In terms of “liveable places” relevant policies to the proposed development include the following:

- > Policy 22: Flood risk and water management.

4.4.5 These policies are addressed below.

4.4.6 The Chief Planner’s Letter of 8th February 2023 provides advice in relation to applying NPF4 policy. It states that the application of planning judgement to the circumstances of an individual situation remains essential for all decision making, informed by principles of proportionality and reasonableness. It states:

“It is important to bear in mind NPF4 must be read and applied as a whole. The intent of each of the 33 policies is set out in NPF4 and can be used to guide decision-making. Conflicts between policies are to be expected. Factors for and against development will be weighed up in the balance of planning judgement.” (underlining added)

4.4.7 The Letter adds:

“It is recognised that it may take some time for planning authorities and stakeholders to get to grips with the NPF4 policies, and in particular the interface with individual LDP policies. As outlined above, in the event of any incompatibility between the provision of NPF4 and the provision of an LDP, whichever of them is the later in date is to prevail. Provisions that are contradictory or in conflict would be likely to be considered incompatible”.

4.5 Policy 1: Tackling the Climate and Nature Crises

4.5.1 The intent of Policy 1 is “to encourage, promote and facilitate development that addresses the global climate emergency and nature crisis”.

4.5.2 **Policy 1** directs decision makers that “when considering all development proposals significant weight will be given to the global climate and nature crises.”

4.5.3 This is a radical departure from the usual approach to policy and weight and clearly denotes a step change in planning policy response to climate change. The matter of weight is no longer left entirely to the discretion of the decision maker.

4.5.4 The Chief Planner’s Letter of 8th February 2023 refers to Policy 1. It states:

“This policy prioritises the climate and nature crises in all decisions. It should be applied together with the other policies in NPF4. It will be for the decision maker to determine whether the significant weight to be applied tips the balance in favour for, or against a proposal on the basis of its positive or negative contribution to the climate and nature crises.”

4.5.5 This statement from the Chief Planner confirms that the decision maker must apply significant weight, but it is for the decision maker to decide if it is for or against the proposal, on the basis of its positive or negative contribution to the climate and nature crises.

4.5.6 The term “Tackling” the respective crises in Policy 1 is also important – this means that decision makers should ensure an urgent and positive response to these issues and take positive action. Furthermore, NPF4 (page 8) refers to cross-cutting outcomes and states with regard to Policy 1 that the policy gives significant weight “to the global climate emergency in order to ensure that it is recognised as a priority in all plans and decisions”.

4.5.7 As noted above, the Proposed Varied Development would enable a substantial level of renewable generation to make a contribution to targets.

The application of Policy 1

- 4.5.8 Given the nature of the Proposed Varied Development, it would make a valuable contribution in relation to targets. It will directly further the policy intent and outcomes of Policy 1 and should be afforded significant positive weight in terms of tackling the climate and nature crises. The specific emission and carbon saving benefits have been set out above in the context of NPF4 Policy 11 which requires the contribution that a development would make to targets to be taken into account.
- 4.5.9 The point is made later in this appraisal against NPF4 that it is important to recognise that the greatest threat to biodiversity is climate change. The principal and essential benefit of the Proposed Varied Development is a significant contribution of renewable energy, to facilitate the earliest possible decarbonisation of the energy system and the achievement of “Net Zero” no later than 2045, in accordance with the objectives of the Climate Change (Scotland) Act 2009 (as amended). The purpose of Net Zero is also to protect biodiversity and the earlier it can be achieved, the greater the benefits to biodiversity.
- 4.5.10 In the Reporter’s overall conclusions in the Supplementary Report of Inquiry¹⁸ for the Consented Development they noted that the *“delivery of renewable energy, a national development, would clearly be a significant benefit, and one which gains significant weight from NPF4 policy 1 in relation to the climate crisis”*. The Proposed Varied Development would further contribute to tackling the climate crisis through a increased yield and generation capacity.
- 4.5.11 The Reporter’s comments on this particular policy in the Sanquhar II Inquiry Report¹⁹ are informative. At paragraph 2.48 of the Supplementary Report, the Reporter addresses NPF4 Policy 1 and states that:

“tackling the nature crisis is required to be given significant weight alongside the climate crisis. There is no indication that one strand should be given greater priority over the other. That does not necessarily mean that an individual proposal must be shown to respond to both crises in equal measure, however. The two matters are also inextricably linked, with the nature crisis being, in part, exacerbated by climate change.”
- 4.5.12 Furthermore, as explained below with reference to NPF4 Policy 3, biodiversity enhancement measures are proposed as part of the Proposed Varied Development.

4.6 Policy 11: Energy

- 4.6.1 For the consideration of wind energy development, Policy 11 ‘Energy’ (page 53) is the lead policy. Policy 11’s intent is set out as:

“to encourage, promote and facilitate all forms of renewable energy development onshore and offshore. This includes energy generation, storage, new and replacement transmission and distribution infrastructure and emerging low carbon and zero emission technologies including hydrogen and carbon capture utilisation and storage.”
- 4.6.2 Policy Outcomes are identified as: *“expansion of renewable, low carbon and zero emission technologies”*.
- 4.6.3 Policy 11 is as follows:

“a) Development proposals for all forms of renewable, low-carbon and zero emissions technologies will be supported. These include:

i. wind farms including repowering, extending, expanding and extending the life of existing wind farms;

¹⁸ Shepherd’s Rig, Section 36 Decision dated 21 August 2023, Supplementary Report of Inquiry dated 2 March 2023 (Case Reference WIN-170-2005).

¹⁹ Sanquhar II, Section 36 Decision dated 31 August 2023, Supplementary Report of Inquiry dated 20 February 2023 (Case Reference WIN-170-2006).

- ii. enabling works, such as grid transmission and distribution infrastructure;*
- iii. energy storage, such as battery storage and pumped storage hydro;*
- iv. small scale renewable energy generation technology;*
- v. solar arrays;*
- vi. proposals associated with negative emissions technologies and carbon capture; and*
- vii. proposals including co-location of these technologies.*

b) Development proposals for wind farms in National Parks and National Scenic Areas will not be supported.

c) Development proposals will only be supported where they maximise net economic impact, including local and community socio-economic benefits such as employment, associated business and supply chain opportunities.

d) Development proposals that impact on international or national designations will be assessed in relation to Policy 4.

e) In addition, project design and mitigation will demonstrate how the following impacts are addressed:

- i. impacts on communities and individual dwellings, including, residential amenity, visual impact, noise and shadow flicker;*
- ii. significant landscape and visual impacts, recognising that such 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;*
- iii. public access, including impact on long distance walking and cycling routes and scenic routes;*
- iv. impacts on aviation and defence interests including seismological recording;*
- v. impacts on telecommunications and broadcasting installations, particularly ensuring that transmission links are not compromised;*
- vi. impacts on road traffic and on adjacent trunk roads, including during construction;*
- vii. impacts on historic environment;*
- viii. effects on hydrology, the water environment and flood risk;*
- ix. biodiversity including impacts on birds;*
- x. impacts on trees, woods and forests;*
- xi. proposals for the decommissioning of developments, including ancillary infrastructure, and site restoration;*
- xii. the quality of site restoration plans including the measures in place to safeguard or guarantee availability of finances to effectively implement those plans; and*
- xiii. cumulative impacts.*

In considering these impacts, significant weight will be placed on the contribution of the proposal to renewable energy generation targets and on greenhouse gas emissions reduction targets.

Grid capacity should not constrain renewable energy development. It is for developers to agree connections to the grid with the relevant network operator. In the case of proposals for grid infrastructure, consideration should be given to underground connections where possible.

f) Consents for development proposals may be time-limited. Areas identified for wind farms are, however, expected to be suitable for use in perpetuity”.

- 4.6.4 The intent and desired outcome of the policy is expressly clear – the expansion of low-carbon, zero emissions renewable energy, through encouragement, promotion and facilitation which the Proposed Varied Development, as a nationally important development, would deliver.
- 4.6.5 The wording of Policy 11(a)(i) makes it clear that the policy supports new wind farms with the extended wording simply reconfirming the positive support for wind farms which includes those stated. This is corroborated by the statement of need of ND3 as detailed above.
- 4.6.6 **Paragraph b) of Policy 11** states that development proposals for wind farms in National Parks and National Scenic Areas (‘NSAs’) will not be supported. The Proposed Varied Development is not in a National Park or NSA.
- 4.6.7 **Paragraph c) of Policy 11** requires socio-economic benefits to be maximised.
- 4.6.8 The socio-economic benefits that would arise from the Proposed Varied Development have been set out in Chapter 3 and in a separate Socio-Economic Impact Assessment. It has been demonstrated that the Proposed Varied Development would maximise net economic impact, including local and community socio-economic benefits.
- 4.6.9 **Paragraph d) of Policy 11** states that development proposals that impact on international and national designations “*will be assessed in relation to Policy 4*”.
- 4.6.10 Policy 4 also deals with impacts in relation to local landscape designations. Therefore, the matter of the impacts of the Proposed Varied Development in relation to such (international, national and local) designations is examined further below with specific regard to the provisions of NPF4 Policy 4.
- 4.6.11 **Paragraph e) of Policy 11** states that “*in addition, project design and mitigation will demonstrate how the following impacts are addressed...*”
- 4.6.12 These “impacts” are listed in the quotation of the policy above and the 13 topics are addressed in turn below.

Impacts on Communities and Individual Dwellings - Residential Visual Amenity

- 4.6.13 As set out in EIA Report **Chapter 8: Landscape and Visual Impact Assessment** (‘LVIA’) a detailed Residential Visual Amenity Assessment (‘RVAA’) was undertaken and is contained in **Technical Appendix 8.6** of the EIA Report. Individual properties have been assessed in detail with respect to Residential Visual Amenity Threshold (‘RVAT’).
- 4.6.14 The RVAA concludes that of the 16 properties assessed, during daylight hours, there would be significant visual effects experienced at seven of the dwellings and/or their associated garden curtilages, namely Properties, 8 - Smittons, 9 – Stroanpatrick, 10 – Craigengillan, –12 – Moorbrock, 13 - Game Keeper’s Cottage, 14 – Strahanna Farm and River Ken Cottage, and 15 - Bridgemark. This is an increase of five from the two properties identified as having significant effects in the RVAA produced in relation to the Consented Development.
- 4.6.15 During the hours of darkness, no significant effects were identified from any of the properties within 2 km of the proposed turbines.
- 4.6.16 It is recognised that certain other residential properties scattered within the local landscape, situated between approximately 2 – 5 km of the proposed turbines, largely located to the east, south-east and west, would experience some major significant visual effects as a result of the Proposed Varied Development.
- 4.6.17 All of the residential properties are situated at a lower elevation to the visible aviation lights. Therefore, the six visible aviation lights would be perceived at a much lower intensity than

their stated intensity due to the vertical directional mitigation that is incorporated into the lighting that reduces the intensity at which the lights are perceived at angles below the horizontal. Furthermore, lights at the residential properties would also reduce the susceptibility of residential receptors as vision from these locations would be less adapted to the dark.

- 4.6.18 It is explained in the LVIA that it is considered that effects during the hours of darkness would be reduced and there would remain no potential for significant visual effects to occur during the hours of darkness.
- 4.6.19 The nearest settlements to the Proposed Varied Development are located at distance from the site, and as such, visual effects experienced from within Carsphairn and St John's Town of Dalry would not be significant. The Proposed Varied Development would not be visible from Moniaive.
- 4.6.20 Appropriate offsets from all properties and settlements have been maintained to ensure that no property would experience an overbearing visual impact. Mitigation has been designed into the proposed aviation lighting to reduce the intensity of the required 2000 candela steady state aviation lights in certain atmospheric conditions by reducing their intensity and attenuating the amount of vertical downwards lighting in order to reduce the visual impact experienced by receptors below the lights.
- 4.6.21 Overall, the RVAA concludes that, when the experience from each property is considered in the round, residents would not experience such an overbearing or overwhelming effect on their visual amenity such that their property would become an unattractive place to live.

Noise and Shadow Flicker

- 4.6.22 **Chapter 14 (Noise) of the EIA Report** considers the potential construction and operational noise impacts of the Proposed Varied Development.
- 4.6.23 The wind farm operational noise assessment has been undertaken in accordance with ETSU-R-97 'The Assessment and Rating of Noise from Wind Farms' and the IOA GPG. Total ETSU-R-97 Noise Limits have been established for all wind farms in the area by re-using existing baseline noise levels and relevant fixed minimum criteria.
- 4.6.24 Predicted cumulative operational noise levels indicate that for noise sensitive receptors neighbouring the Proposed Varied Development, cumulative wind turbine noise (the Proposed Varied Development, Quantans Hill and Windy Rig) would meet the Total ETSU-R-97 Noise Limits at all Noise Assessment Locations ('NALs'). The predictions of the Proposed Varied Development on its own are similar to the Consented Development on its own therefore there are no significant changes when comparing to the current consent's predicted noise levels.
- 4.6.25 Site Specific Noise Limits ('SSNL') have been calculated. Predictions for the Proposed Varied Development on its own show exceedance at two NALs (8 and 9) at one wind speed during daytime periods. As such, additional mitigation is proposed in order to reduce the noise immission from the Proposed Varied Development in these conditions in the form of mode management whereby some turbines would operate in low noise mode to reduce the noise levels from the Proposed Varied Development in order to meet the limit. The predicted noise immission from the Proposed Varied Development meet the SSNLs under all other conditions and at all other NALs for both daytime and night-time periods. The assessment demonstrates that the BESS component meets appropriate SSNLs. As such, the detailed operational noise assessment concludes that there is no significant effect predicted.
- 4.6.26 Any impact from construction and decommission noise and vibration is temporary and was assessed in the Consented Development as having no significant effect. There are no substantial changes to the Proposed Varid Development that suggest this would change, and the effect during construction may be less than the current consent as there are fewer wind turbines to build. The access tracks would remain at similar locations, and the core construction timetable would be shorter. It is suggested that core hours of work and a CEMP are kept consistent with the approach already taken for the Consented Development.

- 4.6.27 **Chapter 17 (Shadow Flicker)** of the EIA Report considers the potential impacts on residential amenity resulting from shadow flicker. There is no standard assessment of shadow flicker in Scotland. However, Good Practice Guidance states that shadow flicker should not be allowed to exceed 30 hours per year or 30 minutes per day. A shadow flicker assessment was undertaken at six identified receptors within the Study Area. Calculations have shown that effects from shadow flicker have the potential to be significant at five of the six receptors (Receptors A (Moorbrock) B (Gamekeeper's Cottage), C (Craigengillan Cottage) D (Craigengillan) and F (Furmiston).
- 4.6.28 It is noted that the results do not take into account existing screening features (structures and vegetation), dwelling orientation and local mitigation measures such as blinds or curtains which will reduce potential effects further. Receptors may also be in rooms that are not generally used at the affected times, therefore, the amount of time when shadow flicker is actually 'experienced' will likely be significantly less than what has been predicted.
- 4.6.29 The Applicant proposes that prior to the erection of the first turbine a Wind Farm Shadow Flicker Protocol will be submitted to and approved in writing by DGC. This will set out mitigation measures to alleviate shadow flicker attributable to the Proposed Varied Development as well as a protocol for addressing a complaint received from a receptor within the Study Area.
- 4.6.30 The residual effect of shadow flicker is, therefore, expected to be not significant for all receptors during the operational phase of the Proposed Varied Development.
- 4.6.31 The assessment of significance of effects for the Proposed Varied Development remains unchanged from that outlined for the Consented Development.

Landscape and Visual Considerations

- 4.6.32 As noted, **Chapter 8** of the EIA Report contains an LVIA which should be referred to for its detail, however summary findings are set out below.

Overall Design Approach

- 4.6.33 Overall, the siting and design of turbines has sought to minimise where possible the impact of the Proposed Varied Development on the landscape and visual resource. The approach to design evolution which has been followed is set out in **Chapter 3 Alternatives and Scheme Evolution** of the EIA Report.
- 4.6.34 The planning history of the site is relevant in considering the design approach and reference should also be made to Chapter 3 of the Consented Development's 2018 EIA Report (Infinergy, 2018) and Chapter 3 of the subsequent 2019 AEI Report (Infinergy, 2019).
- 4.6.35 The following general design principles were adopted during the design iterations made by the Applicant to ensure that the final design of the Proposed Varied Development was the most suitable for the site. Those in bold below were focused around landscape and visual considerations:
- > **Minimise the number of variations required from the Consented Development.**
 - > Create a scheme which maximises the potential of the site to generate renewable energy, while respecting technical and environmental constraints as noted below.
 - > **As far as possible in consideration of other physical and environmental constraints, avoid inconsistent turbine spacing, such as relatively large gaps, outliers or excessive overlapping turbines to minimise visual confusion and ensure a balanced / compact array from key views.**
 - > **Maintain suitable inter-turbine spacing to ensure safe and efficient operation of the turbines.**
 - > **Maximise distance between turbines and residential properties as far as possible.**
 - > Minimise setting impacts on nearby cultural heritage assets, including Craigengillan Cairn, Stroanfreggan Craig fort and Stroanfreggan Bridge Cairn.

- > Avoid of areas of deep peat wherever possible.
- > Avoid siting turbines on steep slopes.
- > Avoid siting turbines and other infrastructure on blanket bog habitat; avoid other sensitive habitats wherever possible.
- > Minimise felling requirements.
- > Maintain suitable buffers around identified bird breeding sites as appropriate.
- > Maintain at least a 500 m buffer from Craigengillan Cairn.
- > Maintain a 50 m buffer around watercourses except where crossings are required.
- > Maintain suitable buffers from the proposed Lorg Wind Farm 132 kV overhead line.
- > Use existing infrastructure as far as practicably possible.

4.6.36 The Proposed Varied Development layout which has been reached has been informed by a robust design iteration process, taking into account potential environmental, landscape and visual and cultural heritage impacts and their effects, physical constraints, and health and safety considerations.

Landscape Character

4.6.37 It is explained in the LVIA that the Proposed Varied Development would result in a direct significant effect on landscape character within the unit of the character type in which the site is located, i.e. the Ken area of Assessment Unit 22 – Southern Uplands with Forest. This is a change from the Consented Development, which identified direct significant effects within two different character types. As the Proposed Varied Development does not include turbines within Assessment Unit 4 – Narrow Valleys, effects on this area would be indirect.

4.6.38 Within Assessment Unit 22 – Southern Uplands with Forest, significant effects would occur up to 5 km from the Proposed Varied Development, equal to that predicted for the Consented Development. It is explained that the structural form of the proposed turbines is such that a high degree of visual permeability would be maintained across the character types and the existing sense of openness within the Southern Uplands would not be greatly altered by the introduction of the turbines.

4.6.39 Furthermore, the scale of a large proportion of the underlying landscape is medium to large and is dominated by coniferous plantation and upland grassland, creating a simple landscape pattern. Within this context, it is explained that the proposed turbines would not diminish the overall scale of the local landscape although in the immediate vicinity of the turbines the presence of the turbines would be clearly dominant. It is therefore recognised that the introduction of the turbines and the movement of the blades when operating would be highly prominent becoming a characterising influence on the character type during the lifetime of the Proposed Varied Development.

4.6.40 The Proposed Varied Development would have a significant indirect effect in some adjoining character types, including the Ken area of Assessment Unit 4 – Narrow Valleys, and Assessment Unit 9 – Upper Dale. It is assessed that significant effects on landscape character would extend up to 5 km from the proposed turbines. The extent of the significant effects is a slight increase on those predicted in relation to the Consented Development, by approximately 0.5 km.

4.6.41 There would be indirect significant effects upon the Stroan area of Assessment Unit 20 – Foothills with Forest up to 4.5 km from the proposed turbines, an increase of 0.5 km on that predicted for the Consented Development. In addition, there would be indirect significant effects within isolated locations within the Rhinns of Kells area of Assessment Unit 20.

4.6.42 Within the Carsphairn area of Assessment Unit 21 – Southern Uplands there would also be indirect significant effects up to 5 km. This is a slight increase in the extent predicted for the

Consented Development, up from 4.5 km. Overall, the effects that are predicted to arise in relation to landscape character are considered to be localised.

Designated Landscapes

- 4.6.43 A small part of the site is located on the periphery of the Galloway Hills Regional Scenic Area ('RSA') which is a local landscape designation. It is acknowledged there would be some localised significant effects, both direct and indirect within a relatively small part of the RSA, in the vicinity of Cairnsmore of Carsphairn. Direct significant effects on the landscape character of the Ken area of the Southern Uplands with Forest (AU 22) would be experienced within the site. Indirect significant effects would be experienced from the small part of the Ken unit that lies inside the RSA, but outwith the site to the west, and from within neighbouring Assessment Unit 21: Southern Uplands – Carsphairn area and Assessment Unit 9: Upper Dale – Upper Glenkens, extending to a distance of 5 km. This is a slight extension to the effect predicted in relation to the Consented Development by approximately 0.5 km.
- 4.6.44 There would also be some significant visual effects experienced from the RSA looking east and north-east towards the Proposed Varied Development up to a distance of c. 8 – 9 km. This is equal to the distance predicted for the Consented Development.
- 4.6.45 As concluded in relation to the Consented Development, despite the identified significant effects upon views and landscape character, there would not be any significant effects upon the special qualities of the Galloway Hills nor its reason for designation.
- 4.6.46 In relation to effects on the special landscape qualities of the Galloway Hills RSA, whilst it is acknowledged there would be some localised significant effects upon landscape character and visual amenity experienced from a small part of the RSA, overall and in views towards the RSA from the landscape beyond its boundary, there would not be significant effects upon the special qualities of the Galloway Hills nor its reason for designation or integrity.

Visual Effects

- 4.6.47 It is explained in the LVIA that there would be a significant visual effect at 16 of the 22 representative viewpoints during daylight hours, namely Viewpoints 1-7, 10-16, 19 and 20. This is one more than was identified in the assessment for the Consented Development, in relation to Viewpoint 13 – Beninner. Additionally, at Viewpoint 4 - Smittons Bridge an increased level of effect has been identified. During the hours of darkness there would be significant effects at five of the 22 viewpoints, namely Viewpoints 2, 12, 13, 14 and 15.
- 4.6.48 From the local footpath network, significant effects are identified during daylight hours from sections of ten routes, namely the Southern Upland Way, Core Path 16 – Garryhorn Rig, Core Path 23 – Dundough Hill, Core Path 164 – Bardennoch Trail, Core Path 182 – Cairnsmore of Carsphairn by Craig of Knockgray, Core Path 188 – Corlae, Core Path 199 – Kendoon Youth Hostel to Butterhole Bridge, and local footpaths DS15, DS16 and DS17. Significant effects were identified on most of these routes in relation to the Consented Development, except for Core Paths 16, Core Path 182 and 188, which were not previously assessed separately. During the hours of darkness, significant visual effects are predicted on sections of six routes, namely the Southern Upland Way, Core Path 23, Core Path 164, and local footpaths DS15, DS16 and DS17.
- 4.6.49 From the local road network significant visual effects are predicted during daylight hours for sections of the A713, B729, B7000 and Lorg Road. This is the same as predicted in relation to the Consented Development. During the hours of darkness significant effects are only predicted for receptors on Lorg Road.
- 4.6.50 It should be noted from the LVIA that there is a high proportion of viewpoints from which there would be significant effects due to the constrained nature of the zone of theoretical visibility ('ZTV'), influenced by surrounding hill summits and valley locations. A large proportion of the viewpoints are located within 5 km of the Proposed Varied Development as this area has the greatest amount of ZTV coverage. Viewpoints located at closer proximity to the proposed turbines are inevitably going to be locations from where receptors are more likely to experience significant effects.

- 4.6.51 Overall, in relation to visual effects, it is accepted that the Proposed Varied Development would be visible from various nearby properties and settlements as well as the surrounding road network, public footpaths and recreational spaces. However, it has been assessed that the significant effects on visual amenity would be localised to within approximately 9 km of the proposed turbines.

Cumulative Landscape & Visual Effects

- 4.6.52 The cumulative assessment in the LVIA has considered the effects of the Proposed Varied Development in relation to two scenarios;

- > Scenario 1 - assumes that other consented (but as yet unbuilt) wind farms are operational; and
- > Scenario 2 - extends this further to assume that all schemes in planning are also operational.

- 4.6.53 In relation to cumulative visual effects, where significant effects are identified, they are also predicted in either the solus assessment or would be introduced by the other cumulative schemes even in the absence of the Proposed Varied Development.

- 4.6.54 In terms of the overall totality of the cumulative landscape and visual effects, when the Proposed Varied Development is considered alongside the other operational and proposed developments, collectively, the other developments would serve to result in wind energy being seen as a noticeable feature in many views in the local landscape. The addition of the Proposed Varied Development would serve to reinforce this pattern, however, significant cumulative effects would occur in the absence of the Proposed Varied Development.

Conclusions on Landscape & Visual Effects in the context of Policy 11

- 4.6.55 As is to be expected with wind energy developments of commercial scale, the LVIA confirms that the Proposed Varied Development would result in some significant effects, but such effects would be localised. There has been a clear process of embedded design mitigation in reaching the final layout and design to minimise impacts.

- 4.6.56 As such the extent and nature of effects is considered to be acceptable when considered against the policy criteria in NPF4 which specifically states, “Where impacts are localised and/or appropriate design mitigation has been applied, they will generally be considered to be acceptable”. While the term ‘local’ is not defined in this context it is helpful to examine how the Scottish Ministers have defined ‘localised’.

- 4.6.57 In the Chleainsaid Section 36 decision²⁰, (16 turbines at 200 m to blade tip height) the Scottish Ministers at page 13 of their Decision Letter, stated:

“The Scottish Ministers agree with the EIA Report conclusions that the proposed development will have some significant landscape and visual impacts but overall these would remain relatively localised, with the majority of significant effects not occurring more than 12 km from the proposed development. It is, therefore, considered by the Scottish Ministers that the landscape and visual impacts are acceptable.”

- 4.6.58 This position is repeated on page 16 of the Decision Letter, where it is stated:

“....these impacts are considered acceptable in the context of the benefits that the proposed development will bring in terms of net economic benefit, contributing to renewable energy and climate change targets, while protecting the natural environment.”

- 4.6.59 Furthermore in the Bunloinn Section 36 Decision²¹ (10 turbines at 200 m to blade tip height), at paragraph 24 of the Decision Letter it states that the planning authority acknowledges there will be significant landscape and visual impacts but “it is satisfied that by virtue of the

²⁰ Scottish Ministers (2023) Chleainsaid Wind Farm Decision ECU Reference: ECU00002031.

²¹ Scottish Ministers (2024) Bunloinn Wind Farm Decision ECU Reference: ECU00003304.

proposed development's location, setting and design, these are largely localised and are acceptable when all matters are taken into account."

4.6.60 At paragraph 93 it is set out that *"The Scottish Ministers acknowledge that the proposed development will have some significant landscape and visual impacts but overall, these would remain relatively localised with the majority of significant effects occurring within 12 km of the proposed development none at a distance greater than 14.7 km."*

4.6.61 It is fully accepted that each development needs to be considered on its respective merits, but it is important that there is consistency in decision making with regard to this particular aspect of NPF4 policy 11 e) and its application. In the two Scottish Ministers' decisions referenced above they reference the landscape and visual effects as being "relatively localised" and "largely localised" which implies Ministers are prepared to take a view that there could be some effects which may be greater than localised, but in the round are considered to be acceptable.

Public Access

4.6.62 The LVIA has addressed visual amenity considerations in relation to public access and recreation as referenced above with regard to visual impacts. The Proposed Varied Development would not impose restrictions on public access.

Aviation, Defence Interests and Telecommunications

4.6.63 **Chapter 16** of the EIA Report considers the potential effect on aviation and defence interests. It concludes that the likely effects of the Proposed Varied Development on aviation operations are very limited. There are no affected civil or military airfields, and the only technical effects are on the NATS En Route (NERL) Lowther Hill and Great Dun Fell radars for which a mitigation scheme will be identified and agreed with NATS.

4.6.64 From a military perspective the only minor effect is on military low flying, and this can be mitigated through the installation of infrared lights. Some turbines will also need to have medium intensity aviation obstruction lighting installed as the turbines will be in excess of 150 m to tip. With the exception of the requirement for aviation lighting, this presents very little difference to the assessment findings for the Consented Development.

4.6.65 In terms of telecommunications, consultation has been undertaken with the telecommunication link operators, and as no impacts were identified through this consultation process, telecommunication impacts were scoped out of the EIA. Further consultation has been undertaken to confirm the conclusion of no anticipated effects, based on the final turbine layout for the Proposed Varied Development.

4.6.66 The Proposed Varied Development is considered to accord with the relevant policies as identified above with respect to aviation and telecommunications matters.

Impacts on Road Traffic and Trunk Roads

4.6.67 **Chapter 15** of the EIA Report has considered the traffic and transport impacts associated with the Proposed Varied Development. The construction phase will result in increased traffic volumes on the number of roads in the vicinity of the Proposed Varied Development, however These will be of a temporary timescale and transitory in nature. Standard and additional mitigation measures are proposed including a Construction Traffic Management Plan ('CTMP'). No significant effects are predicted from the increased traffic volumes reported.

4.6.68 A review of the theoretical road capacity was undertaken for the Study Area which showed that with the addition of construction traffic associated with the Proposed Varied Development, there was significant spare capacity within the road network and no significant capacity issues are expected on any of the roads within the traffic and transport Study Area due to the Proposed Varied Development.

4.6.69 With regards to a comparison between the Proposed Varied Development and the Consented Development, whereby on-site borrow pits are utilised, there would be an

increase of 555 vehicle movements in the month, or approximately 26 per day. This is due to changes into the development content, and this increase is not considered significant.

- 4.6.70 With the implementation of appropriate mitigation, no significant residual effects are anticipated in respect of traffic and transport issues. The residual effects are all assessed to be slight and will occur during the construction phase only, they are temporary and reversible.
- 4.6.71 Traffic levels during the operational phase of Proposed Varied Development will be up to two vehicles per week for maintenance purposes. Traffic levels during the decommissioning of the Proposed Varied Development are expected to be lower than during the construction phase as some elements are likely be left in situ and others broken up on-site.

Historic Environment

- 4.6.72 **Chapter 11** of the EIA Report addresses cultural heritage – addressing the archaeological and historic environment value of the site and assesses the potential both for direct and setting effects on archaeological features and heritage assets resulting from the construction and operation of the Proposed Varied Development.
- 4.6.73 In summary, no significant construction or operational phase effects on the cultural significance of any heritage asset as a result of the Proposed Varied Development are predicted.
- 4.6.74 Effects in relation to the historic environment are examined in more detail below in terms of NPF4 Policy 7 (Historic assets and places).

Hydrology, the Water Environment and Flood Risk

- 4.6.75 **Chapter 13** of the EIA Report considers the impacts of the Proposed Varied Development with regard to hydrology and hydrogeology and flood risk.
- 4.6.76 It is explained in the assessment that most notably from a hydrological and hydrogeological perspective, the Proposed Varied Development reduces the number of turbines from 17 to 11 compared to the Consented Development's design whilst increasing the remaining turbine's size as well as reducing the length of track required. The reduction in the turbine numbers means there are no longer three turbines within the catchment of the Black Burn and consequently the need for a watercourse crossing over the Black Burn has been removed.
- 4.6.77 None of the Proposed Varied Development's infrastructure has been assessed as being at risk from river flooding and the turbine locations avoid potential surface water flooding areas.
- 4.6.78 There are no Groundwater Dependent Terrestrial Ecosystems that are hydrologically or hydrogeologically connected to the Proposed Varied Development infrastructure.
- 4.6.79 The Private Water Supplies within 1 km of the site are all sourced from groundwater and / or are located over 250 m buffer zones from the Proposed Varied Development.
- 4.6.80 It is explained in the assessment that construction of the Proposed Varied Development (including forest felling) has the potential to result in chemical pollution, erosion and sedimentation, impediments to flow, acidification of watercourses, changes in groundwater flow and increase in run-off and flood risk. Measures including absorbent spill pads / kits and other measures highlighted within the Outline Construction and Environmental Management Plan ('OCEMP') will effectively limit uncontained release of chemicals to minor fugitive releases. The risk of such impacts would be further minimised through best practice construction methods such as vehicle speed limits and regular vehicle and machine maintenance.
- 4.6.81 Similar effects have been assessed for the operation and decommissioning of the Proposed Varied Development.
- 4.6.82 Overall, therefore, with the proposed mitigation in place there are no significant adverse effects predicted on hydrology, the water environment or from flood risk.

Biodiversity

Ornithology

- 4.6.83 **Chapter 10** of the EIA Report considers the Proposed Varied Development's potential impact on birds. The assessment focuses on the potential collision impacts to birds. Mitigation measures and conditions agreed for the Consented Development will be adopted for the Proposed Varied Development and no additional measures are required for the Proposed Varied Development.
- 4.6.84 No significant residual effects have been predicted for any bird species of moderate or high nature conservation importance. Cumulative impacts have also been considered, and the assessment has resulted in no significant cumulative effect on any bird species.
- 4.6.85 In conclusion the Proposed Varied Development would not have a significant effect on any bird species, either alone or cumulatively with other developments.

Ecology

- 4.6.86 **Chapter 9** Ecology of the EIA Report assesses effects of the Proposed Varied Development on ecological receptors, including protected species and designated sites. The majority of receptors are scoped out due to their evaluation at a local or less than local level importance (or the lack of any significant impacts being likely to arise as a result of the Proposed Varied Development). Bats and otter are scoped into this assessment.
- 4.6.87 In relation to designated sites, only one site of (non-avian) nature conservation value (Cleugh Site of Specific Scientific Interest ('SSSI')) is located within 10 km of the site. Impacts on Cleugh SSSI and its qualifying feature (unimproved lowland grassland), are unlikely to occur because of the Proposed Varied Development's distance from the SSSI and absence of any examples of the notified features within the site.
- 4.6.88 No internationally designated sites were recorded within 10 km of the site, with six located between 10 and 20 km, made up of Special Area of Conservations and Special Protection Areas. Due to the distance between the Proposed Varied Development and any internationally designated sites and lack of hydrological connectivity, international designated sites are not considered further in this assessment.
- 4.6.89 Potential effects in relation to bats include: habitat displacement (construction and decommissioning), roost loss (construction) and turbine collision and barotrauma (operation). With mitigation in place, these are considered to be not significant.
- 4.6.90 Potential effects in relation to otter include: disturbance (construction and decommissioning) and traffic collision related mortality (construction, operation and decommissioning). With mitigation in place, these are considered to be not significant
- 4.6.91 Committed mitigation measures will offset effects to both bats and otter throughout construction, operation and decommissioning. Taking account of committed mitigation, residual effects are not considered to be significant.
- 4.6.92 Cumulative effects are considered in relation to bats. Given the low levels of bat activity in the local area and lack of significant effects and/or residual impacts from the developments and planning applications considered, no significant cumulative effects are anticipated.
- 4.6.93 Proposed biodiversity enhancement measures are described below with regard to NPF4 Policy 3 (Biodiversity) (see further below) and would give rise to lasting beneficial effects.

(x) Trees, woods and forests

- 4.6.94 **Chapter 7** of the EIA Report addresses Forestry. The Proposed Varied Development is largely located within commercial forestry. The forestry assessment has identified that areas of forestry would require to be felled for the construction and operation of the Proposed Varied Development. This topic is further addressed below in relation to NPF4 Policy 6 (Forestry, woodland and trees).

(xi) Decommissioning and (xii) site restoration plans

- 4.6.95 The potential impacts associated with future decommissioning of the Proposed Varied Development have been considered throughout the EIA, and no significant effects are predicted as a result of any decommissioning activities.
- 4.6.96 Prior to decommissioning, a Decommissioning Environmental Management Plan (DEMP) will be produced to reflect then current legislation and policy and will be agreed with the relevant statutory authorities. The requirement for this would be secure by condition.
- 4.6.97 Site restoration would be undertaken as soon as possible on completion of construction. Where appropriate measures to be delivered as part of the HEMP would be implemented at the earliest practicable opportunity to maximise and expedite the potential for beneficial effects.

Balancing the Impacts v Contribution of a Development and Conclusions on Policy 11

- 4.6.98 It is considered that the Proposed Varied Development would not give rise to any unacceptable effects in relation to any of the above environmental or technical criteria. For a number of the environmental and technical topics, planning conditions can be attached to ensure the Proposed Varied Development would be implemented in an environmentally acceptable way.
- 4.6.99 Part e(ii) of Policy 11 makes it clear and recognises that in terms of significant landscape and visual impacts, such impacts are to be expected for some forms of renewable energy. This is a very clear steer that significant effects are to be expected, and where localised and/or subject to design mitigation, they should generally be acceptable. As explained above, the LVIA concludes that the significant landscape and visual impacts are localised, and that appropriate design mitigation has been adopted.
- 4.6.100 In addition, the Proposed Varied Development is considered to be acceptable in relation to all of Policy 11's environmental and technical topic criteria.
- 4.6.101 The second last paragraph of **Paragraph e) of Policy 11** is expressly clear that in considering any identified impacts of developments, significant weight must be placed on the contribution of the proposal to renewable energy generation targets and greenhouse gas emissions reduction targets. The "contributions" are inextricably related to the scale of a proposed development and policy recognises that any identified impacts must be assessed in the context of these contributions.
- 4.6.102 In terms of contribution to targets, the Proposed Varied Development's contribution has been set out in Chapter 3 above. The scale of the energy output and emissions savings are of national importance.

Conclusions in relation to NPF4 Policy 11

- 4.6.103 The Proposed Varied Development is considered to be acceptable in relation to all of Policy 11's environmental and technical topic criteria.
- 4.6.104 A key point is that any identified impacts have to be weighed against a development's specific contribution to meeting targets – which attracts significant weight. Significant weight is also afforded in relation to Policy 1.
- 4.6.105 Overall, therefore, the Proposed Varied Development is considered to be in accordance with NPF4 Policy 11.

4.7 Policy 3: Biodiversity

Policy 3 and Principles

- 4.7.1 Policy 3 has an intent to protect biodiversity, reverse biodiversity loss, deliver positive effects from development and strengthen nature networks. Outcomes of the policy are that biodiversity is enhanced and better connected, including through strengthened nature networks and nature-based solutions.

- 4.7.2 In summary, there are no unacceptable effects arising in relation to biodiversity matters, nor in relation to nature conservation designations which NPF4 **Policies 3 and 4** respectively address.
- 4.7.3 **Policy 3** requires developments to wherever feasible, provide nature-based solutions that have been integrated and made best use of and for significant biodiversity enhancements to be provided.
- 4.7.4 **Paragraph b)** states that:
“Development proposals for national or major development or for development that requires an Environmental Impact Assessment will only be supported where it can be demonstrated that the proposal will conserve, restore and enhance biodiversity, including nature networks so they are in a demonstrably better state than without intervention. This will include future management. To inform this, best practice assessment methods should be used. Proposals within these categories will demonstrate how they have met all of the following criteria.”
- 4.7.5 The policy goes on to reference the need for an understanding of the existing characteristics of a site and states that an assessment of potential negative effects should be undertaken which should be fully mitigated in line with the mitigation hierarchy prior to identifying enhancements.
- 4.7.6 Paragraph b) iv) of the policy sets out a requirement that *“significant biodiversity enhancements are provided, in addition to any proposed mitigation. This should include nature networks, linking to and strengthening habitat connectivity within and beyond the development, secured within a reasonable timescale and with reasonable certainty. Management arrangements for their long-term retention and monitoring should be included, wherever appropriate.”*
- 4.7.7 **Paragraph d)** adds that *“any potential adverse impacts, including cumulative impacts, of development proposals on biodiversity, nature networks and the natural environment will be minimised through careful planning and design. This will take into account the need to reverse biodiversity loss, safeguard the ecosystem services the natural environment provides, and build resilience by enhancing nature networks and maximising the potential for restoration”.*
- Current Guidance**
- 4.7.8 The letter from the Chief Planner issued on 8 February 2023 refers to the application of Policy 3 where specific supporting guidance / parameters for assessment are not yet available to aid assessments.
- 4.7.9 NPF4 Policy 3 Biodiversity is specifically recognised as one such policy area where final guidance is not yet available. The Chief Planner’s letter states:
“recognising that currently there is no single accepted methodology for calculating and / or measuring biodiversity ‘enhancement’ – we have commissioned research to explore options for developing a biodiversity metric or other tool, specifically for use in Scotland. There will be some proposals which will not give rise for opportunities to contribute to the enhancement of biodiversity, and it will be for the decision maker to take into account the policies in NPF4 as a whole, together with material considerations in each case”. (underlining added)
- 4.7.10 Therefore, exactly how enhancement is to be measured in the longer-term is to be the subject of further guidance.
- 4.7.11 The Scottish Government published **‘Planning Guidance: Biodiversity’ (Biodiversity Guidance)**²² in December 2025. Paragraph 1.1 states that it:
“Sets out the Scottish Minister’s expectations for implementing NPF4 policies which support the cross cutting NPF4 outcome ‘improving biodiversity.’”
- 4.7.12 The Biodiversity Guidance refers to ‘key terms’ and with regard to ‘enhancement’, states at Paragraph 1.10:

²² Scottish Government (2025) Planning Guidance: Biodiversity.

“The terms ‘enhance’ and ‘enhancement’ are widely used in NPF4. In order for biodiversity to be ‘enhanced’ it will need to be demonstrated that it will be in an overall better state than before intervention, and that this will be sustained in the future. Development proposals should clearly set out the type and scale of enhancements they will deliver”.

- 4.7.13 The Biodiversity Guidance addresses development planning and, in terms of development proposals, references ‘core principles.’ At Paragraph 3.1 the Biodiversity Guidance states that these principles can be followed when designing developments so that nature and nature recovery are an integral part of any proposal.
- 4.7.14 The principles set out are as follows:
- > Apply the mitigation hierarchy;
 - > Consider biodiversity from the outset;
 - > Provide synergies and connectivity for nature;
 - > Integrate nature to deliver multiple benefits;
 - > Prioritise on-site enhancement before off-site delivery;
 - > Ensure long term enhancement is secured; and
 - > Additionality (ensuring that enhancement delivered is additional to any measures which would have been likely to happen in the absence of the development).
- 4.7.15 These core principles have been applied as appropriate with regard to the Proposed Varied Development.
- 4.7.16 Page 17 of the Biodiversity Guidance makes specific reference to determining planning applications and, with regard to the policy context, Paragraph 4.1 makes it clear that NPF4 must be read and applied as a whole. Specific reference to NPF4 Policy 3 (Biodiversity) Part 3 b) is made and from Section 4.6 key points include the following:
- > It is set out that NPF4 that does not specify or require a particular assessment approach or methodology to be used, although the policy makes clear that best practice assessment methods should be utilised; and
 - > Assessments can be qualitative or quantitative (for example through use of a metric).
- 4.7.17 Section 4.12 of the Biodiversity Guidance states:
- “In the meantime, the absence of a universally adopted Scottish methodology/tool should not be used to frustrate or delay decision making, and a flexible approach will be required. Wherever relevant and applicable, and as indicated above, information and evidence gathered for statutory and other assessment obligations, such as EIA, can be utilised to demonstrate those ways in which the policy tests set out in NPF4 have been met. Equally, where a developer wishes to use an established metric or tool, the planning submission should demonstrate how Scotland’s habitats and environmental conditions have been taken into account. Where an established metric or tool has been modified, the changes made and the reasons for this should be clearly set out”.*
- 4.7.18 Section 4.14 states that it will be for a planning authority to determine whether the relevant policy criteria have been met, taking into account the circumstances of the particular proposal. The Biodiversity Guidance adds:
- “NPF4 does not specify how much enhancement or ‘net gain’ should be delivered, though biodiversity should clearly be left in a ‘demonstrably better state’ than without intervention. Rather, the selection and design of enhancements will be a matter of judgement based on the circumstances of the individual case, taking into account a range of considerations.”*
- 4.7.19 The Biodiversity Guidance also makes reference to off-site delivery of enhancement proposals and states at Paragraph 4.19 that:

“Where the relevant policy tests cannot be met on site, off-site provision may be considered alongside on site. In these circumstances, off-site delivery should be as close as possible to the development site, with consideration being given firstly to the immediate landscape context and existing ecological value of the site.”

- 4.7.20 NatureScot advised in October 2025²³ that a consultation on a working draft metric and associated guidance is planned for mid-2026 and expect a Scottish metric to be fully available to use in 2027.
- 4.7.21 NatureScot have also published a Research Report ²⁴ which was a review of habitat classifications for their potential use in a Scottish planning biodiversity metric in early 2026. This report reviews and makes recommendations for systems of vegetation classification to be used to provide data for a Scottish planning biodiversity metric (“the Scottish metric”).

Application of Policy 3

- 4.7.22 Notwithstanding the lack of finalised policy guidance at the present time, in terms of environmental benefits, it can be concluded that there will be permanent biodiversity enhancement delivered through the Applicant’s proposed compensation and enhancements to the natural habitat, offered as part of the Proposed Varied Development and set out in the Applicant’s OHEMP (**Appendix 9.8 of the EIA Report**).
- 4.7.23 In summary, the details of the proposed measures relating to biodiversity enhancement will focus predominantly on the following enhancement measures:
- > Blanket bog restoration totalling approximately 66.75 ha of areas that have been degraded through activities associated with coniferous plantation management. Bog habitat creation will benefit a number of species including invertebrates, pine martens and black grouse.
 - > Creation of a dry heath / acid grassland mosaic totalling approximately 8.8 ha in areas of shallow or no peat within keyholed areas and importantly along access tracks which will provide connectivity throughout the site. Creation of this habitat will benefit a number of species including invertebrates, mountain hare, pine marten and black grouse;
 - > Creation of additional (approximately 35.8 ha) deciduous woodland of native flowering/fruited trees with a scrub understorey; and
 - > Enhancement of over 11 ha of riparian corridors through additional bankside planting, and management of vegetation, following SEPA’s good practice guide
- 4.7.24 The OHEMP should be referred to for its detail with regard to the various specific measures that are proposed.
- 4.7.25 It is highlighted that proposals as now presented represent a significant increase in proposed biodiversity enhancement measures than that associated with the Consented Development.
- 4.7.26 It should be noted that this commitment has the objective of benefiting biodiversity and would not just mitigate impacts. The proposals would therefore result in the site, from a biodiversity perspective, being in a “demonstrably better state” than without intervention, in accordance with the provisions of Policy 3.
- 4.7.27 It is also important to keep in mind that the greatest threat to biodiversity is climate change. The principal and essential benefit of the development is a significant contribution of renewable energy, to facilitate the earliest possible decarbonisation of the energy system and the achievement of net zero no later than 2045. A purpose of net zero is to protect biodiversity and the earlier it can be achieved, the greater the benefits to biodiversity.

²³ NatureScot (October 2025) Scottish Biodiversity Metric Update.

²⁴ NatureScot (2026) NatureScot Research Report 1391 - A review of habitat classifications for their potential use in a Scottish planning biodiversity metric.

4.8 Policy 4: Natural places

- 4.8.1 **Policy 4, Paragraph a)** of the policy states that development proposals which by virtue of type location or scale will have an unacceptable impact on the natural environment will not be supported.
- 4.8.2 **Policy 4 Part b)** addresses both nature conservation and landscape designations. Part b deals with development proposals likely to have a significant effect on an existing or proposed European site (Special Area of Conservation or Special Protection Areas). Part c) deals with national landscape designations and also SSSIs and National Nature Reserves.
- 4.8.3 **Policy 4, Part c)** deals with national landscape designations and has a similar approach in relation to the former SPP in terms of how a proposal that affects a National Park or a National scenic Area (NSA) should be addressed. As explained in the LVIA, no national level landscape designations would be affected by the Proposed Varied Development.
- 4.8.4 **Policy 4, Part d)** deals with local landscape designations and contains a different policy approach to that which was contained within the former SPP. Policy 4 is as follows:
- “Development proposals that affect a site designated as ...a local landscape area in the LDP will only be supported where:*
- > Development will not have significant adverse effects on the integrity of the area or the qualities for which it has been identified; or*
 - > Any significant adverse effects on the integrity of the area are clearly outweighed by social, environmental or economic benefits of at least local importance”.*
- 4.8.5 The policy now follows a similar construct to that which deals with national level designations. The first limb of the policy refers to significant effects on the “*integrity*” of the area or “*the qualities for which it has been identified*”.
- 4.8.6 The policy set out in the second limb of NPF4 Policy 4, Part d) provides that development proposals that affect a site designated as a local landscape area in the LDP (Regional Scenic Areas – RSAs in this case) will only be supported where any significant adverse effects on the integrity of the area are clearly outweighed by social, environmental or economic benefits of at least local importance. It must be noted that:
- > this policy provision, reflects the wider NPF4 policy that adverse effects (including adverse landscape and visual effects outside of a National Park or National Scenic Area) must be balanced against the benefits of a development for which significant weight must be given;*
 - > the second limb is independent of the first (“or”) and is to be applied where a decision-maker concludes that a development will have significant adverse effects on the integrity of a local designation;*
 - > NPF4, Policy 4, Part d) now expressly includes a balancing mechanism (“*clearly outweighed by social, environmental or economic benefits*”) and sets out the threshold to be used (“*of at least local importance*”).*
- 4.8.7 **Paragraph f)** sets out that “*development proposals that are likely to have an adverse effect on species protected by legislation will only be supported where the proposal meets the relevant statutory tests. If there is reasonable evidence to suggest that a protected species is present on a site or may be affected by a proposed development, steps must be taken to establish its presence. The level of protection required by legislation must be factored into the planning and design of development, and potential impacts must be fully considered prior to the determination of any application*”.
- 4.8.8 **Policy 4 Part g)** deals with Wild Land. There would be no adverse effects arising in relation to wild land. Importantly the policy states that the “*effects of development outwith wild land areas will not be a significant consideration*”.

The application of Policy 4

- 4.8.9 **Policy 4, Paragraph a)** of the policy states that development proposals which by virtue of type, location or scale will have an unacceptable impact on the natural environment will not be supported. This Planning Statement has examined the impact of the Proposed Varied Development on the natural environment through review of the EIA Report. Subject to the proposed embedded and additional (where required) mitigation there would be no unacceptable effects on the environment.
- 4.8.10 **Policy 4 paragraph b)** refers to development proposals which are likely to have a significant effect on a European designated site and sets out in such circumstances the requirement for Appropriate Assessment. No significant adverse effects are predicted in relation to European sites.
- 4.8.11 **Policy 4, Paragraph c)** deals with national landscape designations and has a similar approach in relation to the former SPP in terms of how a proposal that affects a National Park, or a NSA should be addressed. As noted above, the site is not subject to any national landscape designations.
- 4.8.12 **Policy 4, Paragraph d)** deals with local landscape designations and the key provisions are set out above. As set out under Policy 11 in relation to effects on the special landscape qualities of the Galloway Hills RSA, whilst it is acknowledged there would be some localised significant effects upon landscape character and visual amenity experienced from a small part of the RSA, overall and in views towards the RSA from the landscape beyond its boundary, there would not be significant effects upon the special qualities of the Galloway Hills nor its reason for designation or integrity.
- 4.8.13 **Policy 4 Paragraph f)** relates to protected species, and as noted above no significant effects are predicted on otter or bats.
- 4.8.14 **Policy 4, Paragraph g)** relates to proposals within Wild Land Areas ('WLA'). No areas of Wild Land would be affected by the Proposed Varied Development.
- 4.8.15 Overall, the Proposed Varied Development is considered to be in accordance with NPF4 Policy 4.

4.9 Policy 5: Soils

Policy 5 & Principles

- 4.9.1 The policy intent for Policy 5 is to protect carbon rich soils, restore peatlands and minimise disturbance to soils from development. This is very similar to the policy position that was in the former SPP; however, a key difference, as set out in **paragraph c) ii)**, is that renewable energy proposals are one of the types of development expressly envisaged to be acceptable in principle on peatlands, reflecting the net benefits in carbon emissions reduction and peatland restoration potential which can be gained.
- 4.9.2 **Paragraph a)** states that "*development proposals will only be supported if they are designed and constructed:*
- i. *in accordance with the mitigation hierarchy by first avoiding and then minimising the amount of disturbance to soils on undeveloped land; and*
 - ii. *in a manner that protects soil from damage, including from compaction and erosion, and that minimises soil sealing.*"
- 4.9.3 **Paragraph d)** states: "*Where development on peatland, carbon rich soils or priority peatland habitat is proposed, a detailed site-specific assessment will be required to identify:*
- i. *the baseline depth, habitat condition, quality and stability of carbon rich soils;*
 - ii. *the likely effects of the development on peatland, including on soil disturbance; and*

- iii. *the likely net effects of the development on climate emissions and loss of carbon.*

This assessment should inform careful project design and ensure, in accordance with relevant guidance and the mitigation hierarchy, that adverse impacts are first avoided and then minimised through best practice. A Peat Management Plan will be required to demonstrate that this approach has been followed, alongside other appropriate plans required for restoring and/or enhancing the site into a functioning peatland system capable of achieving carbon sequestration."

The application of Policy 5

- 4.9.4 **Chapter 12 (Geology and Peat)** of the EIA Report considers the potential impact on geology and peat including soils.
- 4.9.5 All of the peat on site is of modified or poor peatland habitat condition. There is no infrastructure on good condition, unmodified peatland. The peat present shows little vegetation or acrotelm as most of the site is covered by commercial forestry and is heavily drained as part of the forestry plantations.
- 4.9.6 It is explained in the assessment that the infrastructure, and associated construction activities, would result in an overall significance of effect that is minor (not significant) for erosion/sedimentation and disturbance of geology and peat which is no different to that reported in the EIA for the Consented Development.
- 4.9.7 In addition, it is noted that where possible, following further detailed ground investigations, subsequent detailed infrastructure specification and design post consent, micro-siting of infrastructure to further reduce the amount of peat being disturbed will be undertaken.
- 4.9.8 The assessment sets out that the turbines have been carefully designed to avoid peat where possible and are located on shallower peat than the Consented Development. The carbon storage capacity of peat increases with depth, thus the Proposed Varied Development is located on less sensitive peatland. In addition, when the infrastructure is located on shallower peat, less peat is extracted per meter area, this combined with the reduced number of turbines and length of access track has led to the volume of excavated peat overall, and proportionally per turbine, being reduced. On a like-for-like basis excluding a bulking factor, the volume of excavated peat has reduced by 13,613 m³. Even when adopting a highly conservative comparison between the total potential peat excavation for the Proposed Varied Development and the infrastructure-only excavation volume reported for the Consented Development, peat excavation is still reduced by at least 5,606 m³. All excavated peat can be appropriately reused around infrastructure. The peat slide stability risk is reported in the assessment as being low.
- 4.9.9 The reinstatement and restoration around the infrastructure would be a positive enhancement to the current peatland conditions on-site, would reduce the impact on peat resource, and would complement the additional peatland restoration measures proposed across the site as a means of habitat enhancement. Full details of these measures would be provided in a detailed CEMP and updated Peat Management Plan which would be prepared and agreed with SEPA, NatureScot and DGC post consent as part of planning conditions.
- 4.9.10 Further ecological surveys would be undertaken by an Ecological Clerk of Works ('ECOW') prior to earthworks to check for protected species. In addition, it is set out in the assessment that peat reinstatement, restoration and enhancements will be monitored during the lifetime of the development, with a higher frequency of monitoring during the construction and immediate period following this to ensure good peatland recovery.
- 4.9.11 The Proposed Varied Development will result in no change to the significance of effects on the geology and peat environment overall, including cumulative effects from that predicted for the Consented Development.
- 4.9.12 The Proposed Varied Development is considered to be in accordance with Policy 5.

4.10 Policy 6: Forestry, woodland and trees

- 4.10.1 The policy intent is to protect and expand forests, woodland and trees. It states that development proposals that enhance, expand and improve woodland and tree cover will be supported.
- 4.10.2 Paragraph b) states that *“development proposals will not be supported where they will result in:*
- “i. Any loss of ancient woodlands, ancient and veteran trees, or adverse impact on their ecological condition;*
 - ii. Adverse impacts on native woodlands, hedgerow and individual trees of high biodiversity value, or identified for protection in the Forestry and Woodland Strategy;*
 - iii. Fragmenting or severing woodland habitats, unless appropriate mitigation measures are identified and implemented in line with the mitigation hierarchy;*
 - iv. Conflict with Restocking Direction, Remedial Notice or Registered Notice to Comply issued by Scottish Forestry.”*
- 4.10.3 Paragraph c) states that:
- “Development proposals involving woodland removal will only be supported where they will achieve significant and clearly defined additional public benefits in accordance with relevant Scottish Government policy on woodland removal. Where woodland is removed, compensatory planting will most likely be expected to be delivered”.*
- Application of Policy 6**
- 4.10.4 **Chapter 7** of the EIA Report addresses Forestry. The Proposed Varied Development is largely located within commercial forestry. The forestry assessment has identified that areas of forestry would require to be felled for the construction and operation of the Proposed Varied Development.
- 4.10.5 The Forestry Study Area ('FSA') referred to in the assessment extends to approximately 820.9 ha and is comprised of a woodland which is privately owned and managed. The forest is comprised largely of commercial conifers with areas of mixed broadleaves planted in the late 1900s and open ground. The crops are in the mid restructuring phase and there have been recent felling and replanting programmes.
- 4.10.6 A total of 226.1 ha will require to be felled to enable the construction and operation of the Proposed Varied Development. The majority of the areas to be felled for the Proposed Varied Development would be restocked, except for land required for the Proposed Varied Development's permanent infrastructure and land to be left unplanted for forest management; or forest design purposes.
- 4.10.7 On site replanting of felled areas within the woodland results in a decrease in the area of stocked woodland. There would be a decrease of 53.3 ha within the FSA for which additional off-site compensatory planting will be required in line with the Scottish Government's Control of Woodland Removal Policy.
- 4.10.8 The extent, location and composition of such planting to be agreed with Scottish Forestry, taking into account any revision to the felling and restocking plans prior to the commencement of construction.
- 4.10.9 The Proposed Varied Development is considered to be in accordance with Policy 6.

4.11 Policy 7: Historic Assets and Places

Policy 7 & Principles

4.11.1 The intent of the Policy 7 is to protect and enhance the historic environment, assets and places and to enable positive change. Key parts of the policy include the following:

- > **Paragraph a)** states that “development proposals with a potentially significant impact on historic assets or places will be accompanied by an assessment which is based on an understanding of the cultural significance of the historic asset and/or place. The assessment should identify the likely visual or physical impact of any proposals for change, including cumulative effects and provide a sound basis for managing the impact of change. Proposals should also be informed by national policy and guidance on managing change in the historic environment, and information held within Historic Environment Records.”
- > **Paragraph c)** states that “development proposals affecting the setting of a Listed building should preserve its character, and its special architectural or historic interest”.
- > **Paragraph d)** states that “development proposals in or affecting Conservation Areas will only be supported where the character and appearance of the Conservation Area and its setting is preserved or enhanced”.
- > **Paragraph h)** states that “development proposals affecting Scheduled Monuments will only be supported where:
 - i) direct impact on the Scheduled Monument are avoided;
 - ii) significant adverse impacts on the integrity of the setting of the Scheduled Monument are avoided; or
 - iii) exceptional circumstances have been demonstrated to justify the impact on a Scheduled Monument and its setting and impact on the monument or its setting have been minimised.
- > **Paragraph i)** states that “development proposals affecting nationally important Gardens and Designed Landscapes will be supported where they protect, preserve or enhance their cultural significance, character and integrity and where proposals will not significantly impact on important views to, from and within the site or its setting”.
- > **Paragraph o)** states that “non designated historic environment assets, places and their setting should be protected and preserved in situ wherever feasible. Where there is potential for non-designated buried archaeological remains to exist below a site, developers will provide an evaluation of the archaeological resource at an early stage so that planning authorities can assess impact”.

The application of Policy 7

4.11.2 **Chapter 11 (Cultural Heritage)** of the EIA Report considers the potential effects of the Proposed Varied Development on heritage assets.

4.11.3 The assessment considers potential direct and indirect physical impacts related to the Proposed Varied Development on the fabric of heritage assets and impacts on the setting of heritage assets within the site and wider area that could affect their cultural significance. It is explained in the assessment that there are 26 known heritage assets within the site which are assessed for direct and indirect physical impacts as a result of the Proposed Varied Development.

4.11.4 There is one designated heritage asset within the site: Scheduled Monument SM2238 Craigengillan, cairn.

4.11.5 Of the remaining 25 non-designated assets within the site, only 10 have not been destroyed by forestry activity. The remaining 15 assets are within plantation, and no evidence is apparent of these in LiDAR or aerial imagery data.

- 4.11.6 Three heritage assets of national importance were considered for setting effects as a result of the Proposed Varied Development. These include Scheduled Monument SM2238 Craigengillan Cairn; Scheduled Monument SM1095 Stroanfreggan Craig, fort; and Non-designated heritage asset of national importance MDG11404 Little Auchrae farmstead. No likely significant effects are anticipated on any other heritage assets.
- 4.11.7 In relation to **SM2238 Craigengillan Cairn**, it is explained in the assessment that the open views towards the south and east contribute to Craigengillan Cairn's cultural significance and are a key characteristic of its setting. Located mid-slope above the valley of the Water of Ken, the cairn is neither prominent nor dominant in middle- or long-distance views towards it, and these views, although still of interest, are considered to contribute less to the monument's cultural significance.
- 4.11.8 The assessment explains that the local prominence of the cairn would remain unaffected and views towards the valley of the Water of Ken from the cairn would be maintained. The Proposed Varied Development would become a competing element in the landscape to the prominence of the cairn as viewed from the Water of Ken valley, however, located mid slope, the cairn (should the intervening plantation be felled), whilst visible, is not particularly prominent or dominant in these views, which are considered to contribute little to the monument's overall cultural significance.
- 4.11.9 It is concluded that the Proposed Varied Development would have a negligible adverse impact on the cultural significance of SM2238 Craigengillan Cairn, which is not significant.
- 4.11.10 It is explained that whilst the proposed turbines would be taller than the Consented Development, they are fewer, and the gaps between them are wider, which has the effect of preserving more openness in views through the Proposed Varied Development, leading to a reduced overall visual clutter than the Consented Development. Whilst adverse impacts upon the cultural significance of SM2238 is assessed to remain, the impact is of no increased magnitude in comparison with the Consented Development.
- 4.11.11 In the terms of NPF4 Policy 7(h), the understanding, appreciation and experience of SM2238 would be adequately retained such that the integrity of setting would not be significantly adversely affected.
- 4.11.12 In relation to **SM1095 Stroanfreggan Craig**, fort, the assessment explains that it is considered that the views from the fort across and along the valley of the Water of Ken are of most relevance to cultural significance and are a key characteristic of its setting. Longer-distance views across the wider landscape – the hills beyond the Water of Ken and the lands further south-west, south and south-east – whilst still of some relevance, are not considered to be key characteristics of the fort's setting. Because of the screening effect of local topography, the fort is not discernible in middle- or long-distance views towards it from the south, south-east or east, and these views are considered to be of limited relevance to the monument's cultural significance.
- 4.11.13 No turbines, or other development infrastructure, would obstruct the key views across and along the valley of the Water of Ken. In views from the point where the fort initially becomes visible on approach, from the east of Smittons Bridge, turbines would be visible to the west and north-west of the fort, but there would be no turbines in the background of key views towards and of the fort, and no turbines would be visible in views towards the fort from the minor road to Craigengillan. Further east, along the B729, as the structure of the fort disappears from view, turbines would be visible to the west of the modern cairn on the ridge of Stroanfreggan Craig. However, no turbines would appear in the background of views towards the fort's location. In views from further south and south-east, such as those from the Southern Upland Way near Stroanfreggan Cairn (SM1043), turbines would appear in the background of views towards the Craig, east of the fort's location.
- 4.11.14 Despite the presence of turbines in views from the fort, and in certain views towards the fort's location, it would remain possible to understand, appreciate and experience the contribution made to cultural significance of the fort's setting.

- 4.11.15 It is concluded that the Proposed Varied Development would have a negligible adverse impact on the cultural significance of SM1095, resulting in an adverse effect of negligible significance, which is not significant.
- 4.11.16 Whilst adverse impacts upon the cultural significance of SM1095 is assessed to remain, the impact is of no increased magnitude in comparison with the Consented Development.
- 4.11.17 In the terms of NPF4 Policy 7(h), the understanding, appreciation and experience of SM1095 would be adequately retained such that the integrity of setting would not be significantly adversely affected.
- 4.11.18 In relation to **MDG11404 Little Auchrae farmstead**, the assessment explains that the presence of the Proposed Varied Development in long-distance views from and across the farmstead remains would not detract from any understanding, appreciation or experience of its setting, or the contribution made by setting to cultural significance.
- 4.11.19 It is concluded that the Proposed Varied Development would have a negligible adverse impact on the cultural significance of MDG11404 Little Auchrae farmstead, resulting in an adverse effect of negligible significance, which is not significant.
- 4.11.20 Similarly, whilst adverse impacts upon the cultural significance of MDG11404 is assessed to remain, the impact is of no increased magnitude in comparison with the Consented Development.
- 4.11.21 In the terms of NPF4 Policy 7(o), the Proposed Varied Development would preserve the parts of setting of non-designated asset MDG11404 that contribute to its cultural significance.
- 4.11.22 All known non-designated heritage assets within the site boundary have been avoided by the Proposed Varied Development infrastructure by design, other than boundary wall HA1 which would be subject to a direct physical impact during the construction phase at a single location. As the Proposed Varied Development intends on utilising the existing tracks, breaches would be required at three locations (depending on the extent of works needed at the site access bellmouth). Given the minimal impact on an asset that measures several kilometres in total length, it is concluded that the Proposed Varied Development would have a negligible adverse impact on HA1, an asset of low importance, resulting in an adverse effect of negligible significance, which is not significant.
- 4.11.23 The assessment explains that the layout of the Proposed Varied Development reduces the potential for disturbance to archaeological remains in comparison with the Consented Development.
- 4.11.24 In addition, no cumulative effects have been identified and no significant residual effects on cultural heritage have been identified through the EIA.
- 4.11.25 The Proposed Varied Development is considered to be in accordance with Policy 7.

4.12 Policy 22 – Flood Risk and Water Management

- 4.12.1 The intent of Policy 22 is to strengthen resilience to flood risk by promoting avoidance as a first principle and reducing the vulnerability of existing and future development to flooding. Paragraph c) is the most relevant part of the policy for the Proposed Varied Development, which states that development proposals should not increase the risk of surface water flooding to others, or itself be at risk. In addition, all rain and surface water should be managed through Sustainable Urban Drainage Systems ('SUDs').

Application of Policy 22

- 4.12.2 As set out above, effects on hydrology, the water environment and flood risk are an assessment criterion within NPF4 Policy 11 (Energy). **Chapter 13 (Hydrology and Hydrogeology)** of the EIA Report addresses hydrology matters in detail including flood risk and sustainable drainage and there are no issues arising with regard to these topics.

4.12.3 Hydrological matters have been addressed above in the context of NPF4 Policy 11. None of the Proposed Varied Development infrastructure has been assessed as being at risk from river flooding and the turbine locations avoid potential surface water flooding areas.

4.12.4 The Proposed Varied Development is considered to be in accordance with NPF4 Policy 22.

4.13 Conclusions on NPF4

4.13.1 Overall, the Proposed Varied Development, as a National Development, is considered to be one that would make a valuable contribution to the NPF4 Spatial Strategy and would help deliver a 'sustainable place'.

4.13.2 The Proposed Varied Development is considered to be acceptable in relation to all of NPF4 Policy 11's environmental and technical topic criteria.

4.13.3 A key point within Policy 11 (Energy) is that any identified impacts have to be weighed against a development's specific contribution to meeting targets – which attracts significant positive weight in the case of the Proposed Varied Development. The Proposed Varied Development would result in increased contribution of clean energy to support the UK and Scottish Government targets.

4.13.4 Significant weight is also afforded in relation to NPF4 Policy 1 (Tackling the climate and nature crises). This policy direction fundamentally alters the planning balance compared to the position that was set out in the former NPF3 and SPP.

4.13.5 The term "tackling" the respective crises in Policy 1 is also important – this means that decision makers should ensure an urgent and positive response to these issues and take positive action.

4.13.6 Overall, the Proposed Varied Development, is considered to be one that would make a valuable contribution to the NPF4 Spatial Strategy and would help deliver a 'sustainable place'. Overall, it is considered that Proposed Varied Development would accord with relevant policies of NPF4, and with NPF4 when read as a whole.

5. Appraisal against the Local Development Plan & Guidance

5.1 Introduction

- 5.1.1 The other element of the statutory Development Plan covering the site comprises:
- > the Dumfries and Galloway Local Development Plan 2 (the 'LDP') (adopted October 2019); and
 - > LDP2 'Wind Energy Development: Development Management Considerations' Supplementary Guidance (February 2020) (the 'SG').
- 5.1.2 The SG contains (Appendix C) the 'Dumfries and Galloway Wind Farm Landscape Capacity Study' (the 'DGWLCS'). The DGWLCS was reviewed and replaced by the 'Wind Energy Landscape Sensitivity Study – Assessment of Larger Wind Turbines (February 2025) (the 'Sensitivity Study').
- 5.1.3 The LDP was therefore prepared and adopted prior to NPF4 coming into force and reflects the provisions of the former SPP, now superseded. Where conflicts or contradictions exists between the LDP and NPF4, or where the LDP is silent, NPF4 policy provisions must prevail.
- 5.1.4 Relevant policies from the LDP are referenced below. This Chapter does not present a detailed assessment of the Proposed Varied Development as that has been covered in Chapter 4 above against the policy provisions of NPF4. An appraisal of key policy and consideration of areas of conflict or contradictions with NPF4 is provided.

5.2 The Lead LDP Policies

- 5.2.1 **Policy IN1: 'Renewable Energy'** relates to renewable energy proposals in general. Policy IN1 is as follows:
- "The Council will support development proposals for all renewable energy generation and/or storage which are located, sited and designed appropriately. The acceptability* of any proposed development will be assessed against the following considerations:*
- > *landscape and visual impact;*
 - > *cumulative impact;*
 - > *impact on local communities and individual dwellings, including visual impact, residential amenity, noise and shadow flicker;*
 - > *the impact on natural and historic environment (including cultural heritage and biodiversity);*
 - > *the impact on forestry and woodlands;*
 - > *the impact on tourism, recreational interests and public access.*
- To enable this assessment sufficient detail should be submitted, to include the following as relevant to the scale and nature of the proposal:*
- > *any associated infrastructure requirements including road and grid connections (where subject to planning consent);*
 - > *environmental and other impacts associated with the construction and operational phases of the development including details of any visual impact, noise and odour issues;*
 - > *relevant provisions for the restoration of the site;*

- > the scale of contribution to renewable energy generation targets;
- > effect on greenhouse gas emissions; and
- > net economic impact, including local and community socio-economic benefits such as employment, associated business and supply chain opportunities.

** Acceptability will be determined through an assessment of the details of the proposal including its benefits and the extent to which its environmental and cumulative impacts can be satisfactorily addressed."*

5.2.2 The criteria in Policy IN1 are all matters that are contained within NPF4 Policy 11 (Energy) (with the exception of tourism matters). These matters have all been addressed in the previous Chapter against NPF4 Policy 11.

5.2.3 **Policy IN2 'Wind Energy'** is specific to wind energy developments and is as follows:

"Assessment of all wind farm proposals:

The Council will support wind energy proposals that are located, sited and designed appropriately. The acceptability of any proposed wind energy development will be assessed against the following considerations:*

Renewable energy benefits:

The scale of contribution to renewable energy generation targets, effect on greenhouse gas emissions and opportunities for energy storage.

Socio-economic benefits:

Net economic impact, including local and community socio-economic benefits such as employment, associated business and supply chain opportunities.

Landscape and visual impacts:

The extent to which the landscape is capable of accommodating the development without significant detrimental landscape or visual impacts, including effects on wild land; and

That the design and scale of the proposal is appropriate to the scale and character of its setting, respecting the main features of the site and the wider environment and that it addresses fully the potential for mitigation.

Cumulative impact:

The extent of any cumulative detrimental landscape or visual impact or impacts on existing patterns of development from two or more wind energy developments and the potential for mitigation.

Impact on local communities and residential interests:

The extent of any detrimental impact on communities, individual dwellings, residents and local amenity, including assessment of the impacts of noise, shadow flicker, visual dominance and the potential for associated mitigation.

Impact on infrastructure:

The extent to which the proposal addresses any detrimental impact on road traffic, adjacent trunk roads and telecommunications, particularly ensuring transmission links are not compromised.

Impact on aviation and defence interests:

The extent to which the proposal addresses any impacts arising from location within an area subject to potential aviation and defence constraints, including the Eskdalemuir Safeguard Area.

Other impacts and considerations:

a) the extent to which the proposal avoids or adequately resolves any other significant adverse impact on the natural environment, including biodiversity, forests and woodland, carbon-rich soils, hydrology, the water environment and flood risk, the historic environment, cultural heritage, tourism and recreational interests and public access.

b) the extent to which the proposal addresses any physical site constraints and appropriate provision for decommissioning and restoration.

**Acceptability will be determined through an assessment of the details of the proposal including its benefits and the extent to which environmental and cumulative impacts can be addressed satisfactorily. “*

- 5.2.4 The criteria in Policy IN2 are all matters that are contained within NPF4 Policy 11 (Energy) (with the exception of tourism matters). These matters have all been addressed in the previous Chapter against NPF4 Policy 11. There is a SPP Spatial Framework and map which is referenced in the policy: it is clearly incompatible with NPF4 and can be disregarded.

5.3 Other LDP Policies

- 5.3.1 A summary of relevant LDP policies is set out below in **Table 5.1**.

Table 5.1: Relevant LDP Policies & Comment regarding NPF4

Policy	Policy Summary	Comment re NPF4
Policy OP1 'Development Considerations'	This is an overarching policy that sets out general development considerations. It highlights that development will be assessed against various considerations depending on the scale, nature and location of the proposal including general amenity; historic landscape; landscape; biodiversity and geodiversity; transport and travel; sustainability; and the water environment.	No conflict or contradiction.
Policy OP2 'Design Quality and Placemaking'	This is an overarching policy that sets out general considerations in relation to design quality of new development. It highlights that development proposals should achieve high quality design in terms of their contribution to the existing built and natural environment, contributing positively to a sense of place and local distinctiveness.	No conflict or contradiction.
Policy ED11 'Dark Skies'	This policy relates to the Council's support for the Galloway Forest Dark Sky Park. The Council will assess proposals for development on their merit where they do not adversely affect the objectives of the Dark Sky Park designation.	
Policy HE1 'Listed Buildings'	The policy sets out considerations that apply to development proposals that impact on the character or appearance of a listed building or its setting.	No conflict or contradiction.

Policy	Policy Summary	Comment re NPF4
Policy HE2 'Conservation Areas'	The policy sets out that the Council will support development within or adjacent to a Conservation Area that preserves or enhances the character and appearance of the area.	No conflict or contradiction.
Policy HE3 'Archaeology'	The policy sets out that the Council will support development and protects significant archaeological and historic assets and protect the wider historic environment from adverse effects.	No conflict or contradiction.
Policy HE4 'Archaeologically Sensitive Areas'	The policy sets out that the Council will support development that safeguards the character, archaeological interest and setting of Archaeologically Sensitive Areas as designated by the Council.	No conflict or contradiction.
Policy HE6 'Gardens and Designed Landscapes'	The policy sets out that the Council will support development that protects or enhances the significant elements, specific qualities, character, integrity and setting, including key views to and from, gardens and designed landscapes included in the Inventory of Gardens and Designed Landscapes or the Non-Inventory List. Proposals that would have a detrimental effect on the specific quality, character or integrity of a garden or designed landscape will not be approved unless it is demonstrated that the proposal has benefits of overriding public interest.	No conflict or contradiction.
Policy NE2 'Regional Scenic Areas'	The policy sets out that development within, or which affects Regional Scenic Areas, may be supported where the Council is satisfied that the landscape character and scenic interest for which the area has been designated would not be significantly adversely affected or there is a specific locational need.	Incompatible with NPF4 Policy 4 (Natural Places) in relation to the policy approach to dealing with impacts on local landscape designations.
Policy NE4 'Sites of international importance for biodiversity'	The policy sets out that development proposals likely to have a significant effect on an existing or potential Special Protection Area, existing or candidate Special Area of Conservation or Ramsar site, including developments outwith a site, will require an appropriate assessment and will only be permitted where inter alia the development does not adversely affect the integrity of the site.	No conflict or contradiction.
Policy NE5 'Species of international importance'	The policy sets out that development proposals that would be likely to have an adverse effect on a European Protected Species will not be permitted unless it can be shown inter alia that the development would not be detrimental to the	No conflict or contradiction.

Policy	Policy Summary	Comment re NPF4
	maintenance of the population of the species at a favourable conservation status in its natural range, and that there is no satisfactory alternative and the development is required for preserving public health or safety or for other areas of overriding public interest.	
Policy NE6 'Sites of national importance for biodiversity and geodiversity'	The policy sets out that development affecting Sites of Special Scientific Interest and other national nature conservations will only be permitted where inter alia it will not adversely affect the integrity of the area or the qualities for which it has been designated or that any such adverse effects are clearly outweighed by social, environmental or economic benefits of national importance.	No conflict or contradiction.
Policy NE7 Forestry and Woodland	This policy sets out that proposals should seek to ensure that ancient and semi-natural woodlands and other woodlands with high nature conservation value are protected and enhanced.	No conflict or contradiction.
Policy NE8 Trees and Development	This policy sets out that where it is not possible to retain woodland then appropriate replacement planting will be required. Replacement planting scheme would be located where possible within the region and follow guidance contained within the Forestry and Woodland Strategy.	No conflict or contradiction.
Policy NE11 'Supporting the Water Environment'	The policy sets out that the Council will not permit development which would result in deterioration in the status of a waterbody or which would likely impede the improvements in waterbody status as set out in the Solway Tweed River Basin Management Plan, unless there are exceptional justifying circumstances. The policy further sets out that if culverting of waterbodies should only be carried out where acceptable mitigation measures would be put in place to protect habitats, passage of fauna, and river form and flow.	No conflict or contradiction.
Policy NE12 'Protection of Water Margins'	The policy relates to protection of water margins. It sets out that where new development is proposed adjacent to or in the vicinity of waterbodies, the water margins will be protected unless there are compelling reasons to justify why this should not be done.	No conflict or contradiction.
Policy NE15 'Protection and Restoration of	The policy relates to the protection and restoration of Peat Deposits as Carbon Sinks. It sets out that the Council will safeguard and protect peat deposits. Where renewable energy generating	No conflict or contradiction.

Policy	Policy Summary	Comment re NPF4
Peat Deposits as Carbon Sinks'	development is proposed the balance of advantage in terms of climate change mitigation must be with the proposed development.	
Policy T1 'Transport Infrastructure'	The policy sets out that development proposals will be appraised to determine their effects on the performance of the strategic and regional highway network.	No conflict or contradiction.

5.3.2 It is considered that the Proposed Varied Development would be in accordance with all of the relevant policies in the LDP as set out in **Table 5.1** above.

Supplementary Guidance

5.3.3 The LDP2 'Wind Energy Development: Development Management Considerations' Supplementary Guidance (February 2020) provides further detail in support of the development management considerations in Policy IN2 'Wind Energy'. It sets out a statement on the main factors that are to be taken into account in reaching planning decisions and details the criteria contained in the policy. The guidance does not raise any new topic or matter not already addressed above.

5.3.4 As noted, the SG contains at Appendix C, the 'Wind Energy Landscape Sensitivity Study – Assessment of Larger Wind Turbines (February 2025) (the 'Sensitivity Study'). This is a strategic sensitivity study and as the OWPS makes clear (paragraph 3.6.5), Landscape Sensitivity Studies may inform but should not be used to determine matters of acceptability.

5.3.5 The Proposed Varied Development is categorised in the Sensitivity Study as very large typology, as it comprises turbines between 150-250 m to tip height. The site is largely located within the Ken unit of Assessment Unit (AU) 22: Southern Uplands with Forest. Detailed reference to the Sensitivity Study is contained within the baseline section of the LVIA.

5.4 Conclusions on the LDP

5.4.1 The environmental and topic considerations within the LDP policies are encompassed within the broad remit of NPF4 Policy 11 Part e). Each of the relevant development management considerations have been addressed above (Chapter 4) in the context of NPF4 Policy 11 and other relevant national policies are not repeated. The Proposed Varied Development would be in accordance with relevant policies of LDP.

5.4.2 It is considered that the effects arising from the Proposed Varied Development would be acceptable in terms of the matters identified by Policy IN2 and there is no conflict with any other relevant policies within the LDP. It is therefore considered that the Proposed Varied Development accords with the LDP when it is read as whole.

5.4.3 The policy provisions of the LDP are based on those of NPF3 and the former SPP. This means, as per the amendments made to the 1997 Act, that where there are any incompatibilities (such as with Policies IN2 and NE2) the provisions of NPF4 will prevail.

6. Conclusions

6.1 The Climate Crisis & Renewable Energy Policy Framework

- 6.1.1 The urgent need for onshore wind energy generation has been set out: a large increase in the deployment of this renewable energy technology is supported through a number of policy documents and by Scottish Government commitments – most recently expressed in the OWPS and in NPF4.
- 6.1.2 Onshore wind energy generation was already viewed and described as “vital” to the attainment of targets in 2017. This imperative has only increased since a ‘climate emergency’ was declared by the Scottish First Minister in April 2019, in line with the recommendations made by the CCC (2019) ‘net zero’ publication²⁵. Furthermore, the drive to attain net zero emissions is now legally binding at the UK and Scottish Government levels.
- 6.1.3 Achieving net zero will require new generation capacity up to and beyond 2045 for Scotland and to 2050 for the UK. Deployment of more onshore wind energy is described as being “*mission critical for meeting our climate targets*” in the OWPS. Whilst 2030 is a key target date, projects that may connect post 2030 should not be afforded less weight in terms of emission reduction and renewable generation benefits.
- 6.1.4 The important benefits of the Proposed Varied Development have been set out in the context of the current climate emergency and would help address the issue of tackling climate change, meeting very challenging net zero targets, and would contribute to improving security of supply.

6.2 The Benefits of the Section 36C Application

- 6.2.1 This Section 36C application is being progressed in order to make amendments to a previously Consented Development for Shepherds Rig Wind Farm. There are benefits associated with the Proposed Varied Development, as set out in Chapter 3, which would be enhanced from that of the Consented Development. In summary:
- > The Applicant has calculated that the energy yield of the Consented Development can be increased by approximately 53% by increasing the height of the proposed turbines. The increased yield would enable the Proposed Varied Development to make an even greater contribution to UK and Scottish Government climate change and renewable energy targets and commitments.
 - > The increase in turbine height, together with the reduction in turbine numbers, would only result in limited changes to environmental effects (as outlined within technical **Chapters 7-18** of the EIA Report) and as examined in this Planning Statement.
 - > Increasing the capacity of the BESS allows for greater storage of excess energy generated during peak wind periods. This enhances the flexibility and reliability of the Proposed Varied Development by ensuring a steady supply of power even when wind generation is low. The increased storage capacity helps to balance supply and demand, enhancing the overall grid stability.
 - > Extending the operational lifetime of the Consented Development would enable the Proposed Varied Development to prolong its contributions to UK and Scottish Government climate change and renewable energy targets and commitments. This extension ensures that the Proposed Varied Development continues to provide renewable energy for a longer period, contributing to long-term decarbonisation goals.

²⁵ CCC, Net Zero, The UK’s contribution to stopping global warming (2019).

6.3 The Planning Balance

- 6.3.1 In NPF4 there is a clear recognition that climate change must become a primary guiding principle for all plans and decisions. Significant weight is to be given to the climate emergency and the contribution of individual developments to tackling climate change.
- 6.3.2 The revised OWPS was published in December 2022. NPF4 came into force on 13 February 2023. Both are up to date statements of Scottish Government policy, directly applicable to determination of this Section 36C application. Both should be afforded very considerable weight in decision-making alongside other important factors including energy and climate change policy and legislation, the global climate crisis and energy security considerations.
- 6.3.3 NPF4 and the OWPS are unambiguous as regards the policy imperative to combat climate change, the crucial role of further onshore wind in doing so, and the scale and urgency of onshore wind deployment required. As described in this Planning Statement:
- > The global climate emergency and the nature crisis are the foundations for the NPF4 Spatial Strategy as a whole. The twin global climate and nature crises are “*at the heart of our vision for a future Scotland*” so that “*the decisions we make today will be in the long-term interest of our country*”²⁶. The policy position, and the priority afforded to combatting the climate emergency, is different to that which was set out in the former NPF3 and SPP;
 - > NPF4 Policy 1 (Tackling the climate and nature crises) directs decision-makers to give significant weight to the global climate emergency in all decisions. This is a radical departure from the usual approach to policy and weight, and clearly denotes a step change in planning policy response to climate change. The matter of weight is no longer left entirely to the discretion of the decision maker; and
 - > Both NPF4 and the OWPS are clear that further onshore wind development, of scale and utilising modern, larger turbines, has a crucial role in combatting climate change, transitioning to a Net Zero Scotland and ensuring security of energy supply. NPF4 Policy 11 (Energy) strongly supports proposals for all forms of renewable, low-carbon and zero emissions technologies, including onshore wind farms.
- 6.3.4 It is important to fully recognise both the scale and urgency of the challenge set out in these documents, and the required response from decision-makers. NPF4 is clear that significant progress must be made by 2030 requiring, as set out in the OWPS, that “*we must now go further and faster than before. We expect the next decade to see a substantial increase in demand for electricity to support Net Zero delivery across all sectors, including heat, transport and industrial processes*”²⁷.
- 6.3.5 Publication of the OWPS for the first time, set an onshore wind energy generation target: a Scottish Government ambition for a **minimum** of 20 GW of installed onshore wind energy capacity by 2030. As noted, good progress has been made to reach this but there is still more to do. This is also embedded in the Scottish Government’s consultative draft Energy Strategy and Just Transition Plan, together with the commitment to “**place the climate and nature at the centre of our planning system**”²⁸ (original emphasis) in line with the NPF4.
- 6.3.6 By any measure, the identified need for delivery of this additional capacity is a massive challenge requiring an urgent and positive response not just by 2030 but beyond to enable net zero to be attained and then sustained.

²⁶ NPF4, page 2.

²⁷ OWPS 2022, paragraph 1.1.2.

²⁸ Energy Strategy and Just Transition Plan, page 55.

- 6.3.7 As the Statement of Need for Strategic Renewable Electricity Generation and Transmission Infrastructure explains²⁹ *“A large and rapid increase in electricity generation from renewable sources will be essential for Scotland to meet its Net Zero emissions targets.”*
- 6.3.8 The Statement of Need relates to the attainment of Government renewable generation and emission reduction targets. Moreover, it relates to the importance of developing electricity supplies which are not dependent on volatile international markets and are located within the UK’s national boundaries. The urgency for an electricity system which is self-reliant and not reliant on fossil fuels is now enormous, in order to protect consumers from high and volatile energy prices. Moreover, such a system would reduce opportunities for destructive geopolitical intrusion into national electricity supplies and this matter has grown in importance in recent months.
- 6.3.9 Other policy support for development of wind farms is found in NPF4 and the OWPS:
- > In addition to the cross-cutting NPF4 Policy 1, NPF4 Policy 11 (Energy) directs that in considering the identified impacts of an onshore wind proposal significant weight will be placed on the contribution of the Proposed Development to renewable energy generation targets and on greenhouse gas emissions reduction targets;
 - > The OWPS expressly recognises that meeting the ambition of a minimum installed capacity of 20GW of onshore wind in Scotland by 2030 will require taller and more efficient turbines and that *“this will change the landscape”*;
 - > NPF4 Policy 11 confirms that significant landscape and visual impacts are to be expected for some forms of renewable energy. Scottish Government policy, which forms part of the Development Plan, is that where such impacts are localised and / or appropriate design mitigation has been applied, they will generally be considered to be acceptable. Notably, policy recognises that significant landscape and visual effects are inevitable and generally acceptable. As explained above, the landscape and visual effects would be localised.
 - > NPF4 Policy 4 provides in principle support for wind farm development in all locations with the exception of National Parks and NSAs, unless the conditions in NPF4 Policy 4 c) are met. The Proposed Varied Development seeks to optimise a Consented Development and it would have no impacts on any national landscape designations.
 - > NPF4 Policy 4, Part d) specifically relates to a proposed development that may adversely affect the integrity of a local landscape designation. It provides that development will be supported where significant adverse effects on the integrity of the area are clearly outweighed by social, environmental or economic benefits of at least local importance. There would be no adverse impacts on the integrity of the Galloway Hills RSA in this case.
 - > In relation to biodiversity matters, NPF4 Policy 3 (Biodiversity) requires that for national and EIA development, that significant biodiversity enhancements be provided. The Applicant has proposed such measures.
 - > In relation to NPF4 Policy 5 (Soils) the policy framework now supports development proposals on peatland and carbon rich soil where they relate to the generation of energy from renewable sources. Such development requires to be subject to a site-specific assessment which has been undertaken in this case for the Proposed Varied Development. As explained, the siting and design approach has sought to minimise adverse impacts on peatland and carbon rich soils.
- 6.3.10 The Applicant has gone to considerable lengths to ensure a satisfactory layout, design and composition for the Proposed Varied Development. In short, appropriate design mitigation has been applied. Potentially significant adverse landscape and visual effects resulting from the Proposed Varied Development have been addressed through an iterative design process (i.e. ‘mitigation by design’) and a well-considered proposal has been established, which has

²⁹ NPF4, page 103.

acceptable effects. The landscape and visual impacts would be localised and it is clear that such impacts are to be considered generally acceptable.

- 6.3.11 NPF4 and the OWPS require that the decision-maker must also identify and weigh the adverse effects of a proposed development. However, increased weight is to be given to the benefits of a proposed development in the planning balance owing to the seriousness and importance of energy policy related considerations and the contribution of the Proposed Varied Development in meeting climate change targets.
- 6.3.12 The LDP pre-dates NPF4 however based on the appraisal set out above it is considered that the Proposed Development would be in accordance with relevant LDP policies and with the LDP read as a whole.
- 6.3.13 It is considered that this approach is very clearly reflected and articulated in NPF4 and the OWPS (subject to Scottish Government policy now expressly stating that significant weight will be given to the global climate and nature crises and a proposed development's contribution towards meeting targets). Moreover, Section 3.6 of the OWPS states that the criteria for assessing proposals (in NPF4) have been updated "*including **stronger weight being afforded to the contribution of the development to the climate emergency***".
- 6.3.14 In considering the increased policy support for renewable development at the national level which has been introduced by NPF4, a series of Section 36 decisions³⁰ issued not long after NPF4 came into force, give a clear direction as to the way Reporters and the Scottish Ministers have approached the policy position in NPF4. The position remains that there is strong support for renewables and in particular onshore wind development and that the seriousness of climate change, its potential effects and the need to cut carbon dioxide emissions, remain a priority of the Scottish Ministers.
- 6.3.15 In this case, the Proposed Varied Development has a capacity over 50MW and is a development of national importance that will help to deliver the national Spatial Strategy set out in NPF4. The Proposed Varied Development would make a valuable and near-term contribution to help Scotland, and the UK attain net zero, security of supply and related socio-economic objectives. It is submitted that significant weight should be given to this contribution when weighing the need for the Proposed Varied Development and its identified effects within the planning balance.
- 6.3.16 The effects of the Proposed Varied Development, including how relevant effects listed in NPF4 Policy 11 Paragraph (e) have been addressed, are detailed in the supporting information to the application. In terms of Policy 11, in considering the identified impacts of the Proposed Varied Development, significant weight must be placed on its nationally important contribution to renewable energy generation and greenhouse gas emissions reduction targets.

6.4 Consideration of Grid Connection in the Planning Balance

- 6.4.1 The Applicant has prepared a Indicative Grid Connection Assessment to set out the potential likely environmental effects associated with the likely grid connection route for the Proposed Varied Development. This is provided in **Appendix 4.2** of the EIA Report.
- 6.4.2 As such, based on the information before Scottish Ministers, they are in a position to conclude what likely effects – or disbenefits – would arise from the associated grid connection and weigh those against the considerable benefits of the Proposed Varied Development (acknowledging these will only be realised if consent is obtained for the associated grid connection) and supportive planning policy, as set out within this Planning Statement. On that basis, Scottish Ministers can undertake the exercise of weighing the benefits and disbenefits in the planning balance.

³⁰ In this regard see Sanquhar II (para 4.5 of Supplementary Inquiry Report), Clashindarroch II (paras 2.45, 2.51 and 2.90 of Supplementary Inquiry Report) and Shepherd's Rig (paras 3.4 and 3.14 of Supplementary Inquiry Report).

- 6.4.3 Consideration of the potential environmental effects of the grid connection, assessed in combination with the effects of the Proposed Varied Development, is a relevant consideration in the determination of the Section 36C application for the Proposed Varied Development. Both projects together must be delivered in order to realise the benefits. However, it is reasonable to conclude, based on the information that has been made available, that appropriate mitigation will be secured where any adverse environmental effects have been identified. The assessment has not identified any likely significant effects arising from the proposed grid connection, nor any likely significant in-combination effects from the grid connection and the Proposed Varied Development.
- 6.4.4 NPF4 requires that the decision-maker must identify and weigh the adverse effects of a proposed development. However, increased weight is to be given to the benefits of a development in the planning balance owing to the seriousness and importance of energy policy related considerations and the contribution of the Proposed Varied Development to meeting climate change targets – as required by NPF4 Policy 11 (Energy) and 1 (Tackling the climate and nature crises).
- 6.4.5 These benefits are balanced with the identified adverse effects of the Proposed Varied Development (and associated grid connection) in the overall planning balance in considering whether Section 36C consent for the Proposed Varied Development should be granted.
- 6.4.6 The conclusion is that the Proposed Varied Development, taking into account the proposed grid connection, would be in accordance with all relevant national planning and energy policies and the planning balance is in favour of granting consent for the Proposed Varied Development.

6.5 Overall Conclusion

- 6.5.1 The policy set out in NPF4 and the OWPS requires a rebalancing of the consenting of onshore wind developments in response to the challenges of tackling the climate and nature crises. Having regard to the weight to be ascribed to the nationally important benefits of the development, it is considered that the benefits of the proposal clearly outweigh its adverse effects.
- 6.5.2 The up-to-date policy set out in NPF4 and the OWPS and the policy being consulted upon in the draft Energy Strategy provide strong and increased support for the grant of consent for the Proposed Varied Development.
- 6.5.3 The conclusion is that the Proposed Varied Development would be in accordance with all relevant policies of NPF4 and the LDP, and with the Development Plan when read as a whole insofar as that is a relevant matter in a Section 36C application.

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