



Cairnoch Hill Wind Farm

Planning Application:

Planning Statement

August 2026

Eurowind Energy™

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1. Introduction

1.1 Background

- 1.1.1 This Planning Statement has been prepared by David Bell Planning Ltd ('DBP') on behalf of Eurowind Energy Limited (the Applicant) in relation to the proposed Cairnoch Hill Wind Farm ('the Proposed Development') located on land owned by the Scottish Ministers and managed by Forestry and Land Scotland ('FLS') at Cairnoch Hill within the administrative boundary of Stirling Council ('the Site').
- 1.1.2 The Planning Statement supports a planning application submitted to Stirling Council ('SC') under the Town and Country Planning (Scotland) Act 1997 ('the 1997 Act'). The Proposed Development would have an installed generating capacity of up to 30 megawatts ('MW') depending on the final wind turbine model selected.
- 1.1.3 The planning application is accompanied by an Environmental Impact Assessment Report ('EIA Report') which has been undertaken in accordance with The Town and Country Planning (Environmental Impact Assessment) Regulations 2017 ('the EIA Regulations'). The EIA Report presents information on the identification and assessment of the likely significant adverse and beneficial environmental effects of the proposal.
- 1.1.4 This Planning Statement presents an assessment of the proposal against relevant policy with due regard given to the provisions of the statutory Development Plan made up of both National Planning Framework 4 ('NPF4') and the Local Development Plan ('LDP') for the SC area, national energy and planning policy, and other relevant material considerations.
- 1.1.5 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 planning application package. The EIA Report and other relevant accompanying documents are referenced 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 Development in relation to the planning policy framework and relevant material considerations.

1.2 The Applicant

- 1.2.1 The Applicant is Eurowind Energy Limited (Company Number SC648827). The Applicant is part of the wider Eurowind Energy Group ('Eurowind Energy'). Eurowind Energy was established in Denmark in 2006, and one of Europe's leading renewable energy developers, with operations in 16 countries across Europe and the United States.
- 1.2.2 Eurowind Energy Limited employs an experienced UK team based in Glasgow that was established in 2021. Eurowind Energy UK has one operational wind farm and one consented 16MW solar farm at Howpark, in the Scottish Borders. As well as the consented Uisenis Wind Farm project on the Isle of Lewis (189 MW) and a growing development portfolio of over 2.9 GW across the UK.
- 1.2.3 Eurowind Energy develops, constructs, and operates wind, solar photovoltaic and 'Power to X' assets across Europe and in the USA. They are dedicated to local long term solutions, and believe that the future of energy supply is renewable, clean, and sustainable. Projects are developed in close collaboration with a range of local stakeholders to develop smart schemes that work for all. Eurowind Energy only engages in projects that they, themselves, want to invest in.
- 1.2.4 Further information on Eurowind Energy Limited can be found on its company website at <https://www.eurowindenergy.com>.

1.3 The Statutory Framework

- 1.3.1 As the Proposed Development has a generating capacity of less than 50 MW, planning permission is required from SC under Section 25 of the 1997 Act.
- 1.3.2 Section 25 of the 1997 Act requires that planning decisions are taken in accordance with the statutory Development Plan unless material considerations indicate otherwise. Therefore, the key questions for the Proposed Development are:
- > Is the development as proposed in accordance with the relevant policies of the statutory Development Plan?
 - > If not, are there material considerations that determine a decision should be made contrary to the Development Plan?
- 1.3.3 In answering these questions, consideration is given to whether:
- > There is an identifiable need for the proposed development; and
 - > The environmental effects of the proposed development would be acceptable when considered against the Development Plan policy framework and material considerations.
- 1.3.4 Under the Town and Country Planning (Hierarchy of Developments) (Scotland) Regulations 2009, the Proposed Development falls under Schedule 4 'Electricity Generation' and exceeds the threshold of 20 MW and is therefore categorised as 'Major Development'. The application has therefore been subject to Pre-Application Consultation ('PAC'). A Proposal of Application Notice ('PAN') was originally submitted on 23 October 2024. Since a period of more than 18 months expired from the date the initial PAN was submitted to the Council, the PAC process was re-started with a second PAN having been submitted to SC's planning department on 26 February 2026. Public consultation events were held at venues in proximity to the Proposed Development Site, in November 2024 (under the original PAN), March and April 2026, and then finally in June 2026.
- 1.3.5 A PAC Report is submitted as part of the application as statutorily required, which summarises the consultation process and outcomes thereof.
- 1.3.6 The application for consent is accompanied by an EIA Report which presents the findings of an EIA undertaken in accordance with the EIA Regulations. The EIA Report is based on a Scoping Opinion received from SC on 13 November 2024. The EIA Report identifies, describes, and assesses the likely significant environmental effects of the Proposed Development and supports the accompanying planning application. It has been undertaken to ensure that environmental considerations are taken into account during the decision-making process.

1.4 Site Location and Description

- 1.4.1 The Proposed Development Site is located at Cairnoch Hill, on land managed by FLS, within the administrative boundary of SC. The Site covers an area of approximately 573 hectares ('ha'). The Site location is presented at **Figure 1.1** of the EIA Report and reproduced below at **Figure 1.1**.
- 1.4.2 The Site is predominantly characterised by commercial conifer plantation, with areas of recent felling, and lies within the Lennox Hills, immediately north of the Carron Valley Reservoir. Elevations across the Site range from approximately 227m to 413m Above Ordnance Datum ('AOD'). The Site lies within the Southern Hills Local Landscape Area.
- 1.4.3 Access to the Site is provided via the B818 and an existing network of forestry tracks.
- 1.4.4 The nearest settlement is the hamlet at Carron Valley reservoir dam, approximately 1.25 km east of the Site. Fintry is, located approximately 6 km to the west. Other nearby towns include Kilsyth, Denny, and Stirling, located approximately 5.3 km to 8.3km from the Site. There are a number of residences located within 1.25 km of the Site, with the closest residential properties being located to the south (Cairnoch Bothy and Cairnoch Farm), and the north

(Easter Cringate and New Cairnoch Lodge) of the Site. These four properties are financially involved in the Proposed Development.

- 1.4.5 The Carron Valley Reservoir lies immediately to the south of the Site.
- 1.4.6 A number of operational, consented, and proposed wind energy developments are located within the wider surrounding area and have been considered as part of cumulative assessment for the EIA.
- 1.4.7 Several statutory and non-statutory environmental designations are present in the area surrounding the Site, although none are located within the Site itself.
- 1.4.8 Further detail on the Site, surrounding area, and design evolution of the Proposed Development is provided in **Chapter 2: Design Evolution and Alternatives** of the EIA Report, with topic-specific assessment set out in technical chapters of the EIA Report.

Figure 1.1: Site Location



1.5 Description of the Proposed Development

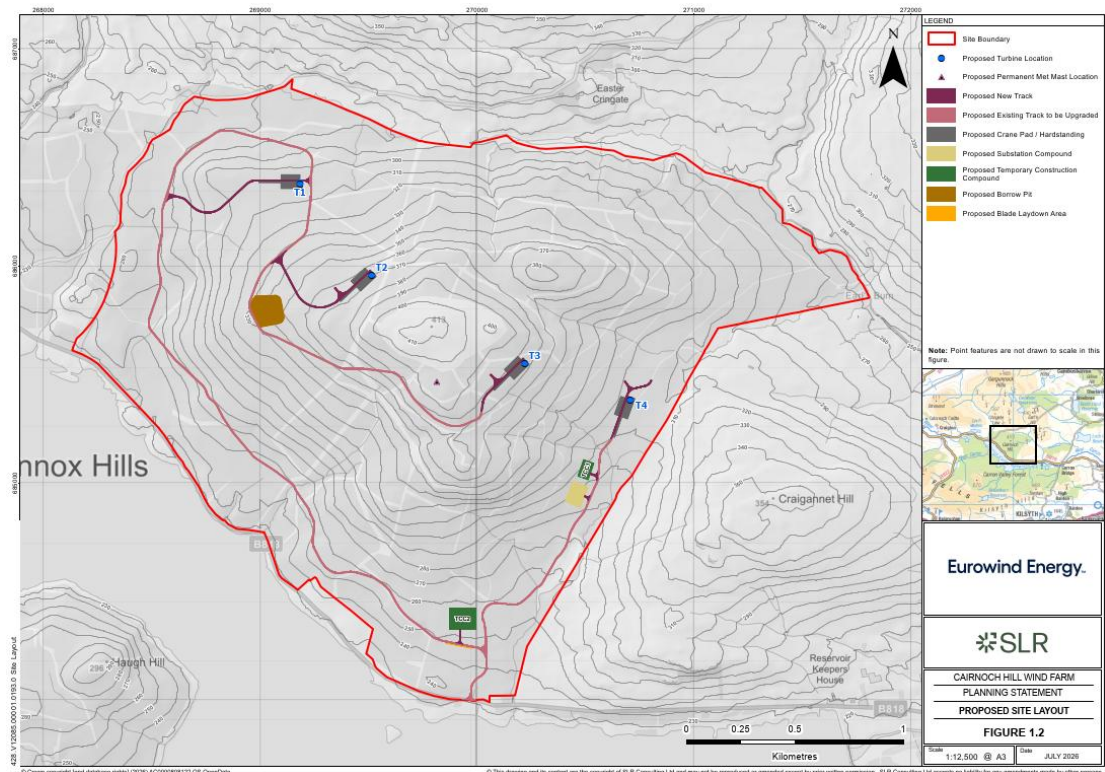
- 1.5.1 The Proposed Development comprises four three-bladed horizontal axis wind turbines up to 180m tip height, with a combined rated output in the region of up to 30 MW. The Proposed Development also includes associated infrastructure including wind turbine foundations, crane hardstandings, new and upgraded access tracks, underground cabling, a substation compound including a control building, one borrow pit, two temporary construction compounds, and a permanent anemometry mast. The Proposed Site Layout is provided at **Figure 3.1** of the EIA Report and reproduced below at **Figure 1.2**. A detailed description of the Proposed Development is set out in **Chapter 3 Description of the Development** of the EIA Report.

- 1.5.2 In total, approximately 75.8ha of plantation conifer woodland would be felled as a result of the Proposed Development to facilitate the new access tracks, wind turbines, the substation compound, the temporary construction compounds, the borrow pit, and the anemometry mast. It also includes advanced felling required to avoid wind throw. Of the 75.8 ha,

approximately 34.4 ha is permanent felling needed to facilitate the construction of the Proposed Development and 41.4ha of advanced felling to avoid wind blow which would be restocked. Any tree felling which is permanent and cannot be restocked due to the infrastructure footprint of the Proposed Development, would result in an equivalent amount of compensatory planting (likely to be off Site) being required.

- 1.5.3 In addition to the felling required in order facilitate the construction and operation of the Proposed Development, the felling of some other areas on Site is included in the **Technical Appendix 8.6: Outline Habitat Management Plan ('HMP')** of the EIA Report. The Outline HMP proposes that some areas be felled for biodiversity enhancement purposes, such as native tree planting, and pond areas / buffers. **Technical Appendix 3.2: Forestry** of the EIA Report outlines the specific breakdown of forest species and the areas on Site where felling would be required. Harvesting operations would take place early on in the construction programme and outwith the bird breeding season.
- 1.5.4 The Proposed Development has been designed with an operational life of up to 40 years, at the end of which it would be decommissioned, or an application may be submitted to repower the Site. The key components of the Proposed Development are as follows:
- > Four wind turbines including internal transformers, with blade tip heights of up to 180m.
 - > Four wind turbine foundations (approximately 27m diameter) and associated crane hardstandings (approximately 99m x 35m and 1m in depth).
 - > Approximately 7.4 km of upgraded access tracks, and approximately 2.3 km of new access tracks. Both new and upgraded access track with running width widened to 6m (wider at bends), and a further 3m allowance on either side of the track for drainage / cabling.
 - > Approximately 10 km of underground cabling along access tracks to connect the wind turbine locations, and the onsite electrical substation.
 - > One onsite substation which would accommodate 33 kV Switchgear to collect electricity from different parts of the Site. The substation compound would have an area of 75m x 100m and would include a control and metering building (approximately 16m x 11m and 5m high).
 - > Use of one existing onsite borrow pit (working the borrow to a total area of approximately 1.82 ha).
 - > One permanent anemometry mast up to 122.5m in height. The mast would have a main foundation area of approximately 3m x 3m, as well as four anchor points for supporting guy wires.
 - > Two temporary construction compounds (12,000m² and 4,000m² respectively).
- 1.5.5 Typical details for the proposed turbines, foundations, access tracks, crane hardstandings, electrical infrastructure, borrow pit, anemometry mast, and temporary construction compounds are shown on **Figures 3.2 to 3.14** of the EIA Report.

Figure 1.2: Proposed Site Layout



Access to Site

- 1.5.6 All access to the Site would be taken from the B818 via an upgraded entrance.
- 1.5.7 The delivery of abnormal loads, such as wind turbine components, is expected to be from the port of Grangemouth, via Central Dock Road, A904 Earls Road, M9 to Junction 9, A872 south towards Dunipace, A872 Nethermain Road, and the B818 to the Site entrance.
- 1.5.8 The proposed abnormal load route was assessed and verified for wind turbine blades up to 86m. **Technical Appendix 12.1: Turbine Delivery Route Feasibility Assessment** of the EIA Report identifies the areas where permanent or temporary road upgrades would be required. Any road improvements would be undertaken within this envelope and subject to a separate consent.

Micrositing

- 1.5.9 It is proposed that a 50m micrositing tolerance for wind turbines and all other infrastructure would be applied to the Proposed Development (so long as infrastructure does not move within 50m of any identified watercourse, or move closer to a watercourse where it is already within 50m). Within this distance, any change from the consented locations would be subject to approval of the Environmental Clerk of Works ('EnvCoW') as required, and in consideration of other known constraints.

Construction

- 1.5.10 It is anticipated that construction of the Proposed Development would, subject to consent being granted, commence in late 2029 and would last approximately 16 months.

- 1.5.11 The construction working hours for the Proposed Development are set from 07:00 to 19:00, Monday through Friday, and from 07:00 to 16:00 on Saturdays. It should be noted that certain activities, such as abnormal load deliveries, concrete deliveries during foundation pours, and the lifting of wind turbine components, may need to take place outside of these specified hours (excluding Sundays). Any works beyond these activities, and outside the stated working hours, would not be undertaken without prior approval from SC.
- 1.5.12 A Construction Environmental Management Plan ('CEMP') would be secured by way of a condition of planning permission. An outline CEMP is provided as **Technical Appendix 3.1** of the EIA Report.

Section 58 of the Town and Country Planning Act 1997

- 1.5.13 The Applicant is seeking a condition in terms of Section 58 of the 1997 Act to extend the period of consent to five years. This is to allow for any alterations or changes in the programme related to delivery of the Proposed Development including the impacts of grid reform and is common practice in many large scale energy infrastructure projects given the complexities associated with large scale projects.

1.6 Grid Connection

- 1.6.1 The grid connection route from the onsite substation and the form of which (i.e. whether overhead lines, underground cables or a combination) has yet to be determined. The Applicant is currently awaiting the outcome of the Gate 2 Variation Offer process and, consequently, the connection point, route and infrastructure requirements remain unknown.
- 1.6.2 Paragraph 6 of Schedule 4 of the EIA Regulations provides that it is appropriate for the assessment material to include "...details of difficulties (for example technical deficiencies or lack of knowledge) encountered compiling the required information and the main uncertainties involved".
- 1.6.3 In the recent case of *Raeshaw Farms Limited v Scottish Ministers and Energiekontor UK Limited* [2026] CSIH 10 ("Raeshaw") the Court at paragraph 49 of the judgment stated that "*it cannot be said in absolute terms that the only permissible way in which a planning application for a windfarm can be made is to apply for the whole project to include the grid connection*". The Proposed Development anticipates that if the grid connection route is determined to require an overhead line, this would require separate consent under Section 37 of the Electricity Act 1989. That grid connection application would be made by SP Energy Networks ('SPEN') who are responsible for the Transmission Grid in the area of the Proposed Development and who would own assets beyond the Site substation. It is anticipated that any cumulative impacts between the grid connection and the Proposed Development would be considered as part of the Section 37 application.
- 1.6.4 The Applicant is not applying for planning permission for the grid connection as part of this application. Nonetheless, the Court confirmed in *Raeshaw* that decision-makers must evaluate, on a case by case and fact specific basis, whether or not a wind farm and its grid connection form a single project for the purposes of EIA. Whilst this is for decision-makers to consider as part of their determination process on the application, the Applicant has provided an assessment to support this which can be located in the EIA Report at **Technical Appendix 3.3: Connection to Electricity Grid – Raeshaw Farms Judgement**.

1.7 Scope & Structure of Statement

- 1.7.1 This Planning Statement provides an assessment of the Proposed Development against the statutory Development Plan and relevant material considerations.
- 1.7.2 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 other considerations;
 - > **Chapter 3** summarises the benefits that would arise from the Proposed Development;

- > **Chapter 4** appraises the Proposed Development against the most relevant policy provisions of NPF4;
- > **Chapter 5** appraises the Proposed 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 Development can draw a high level of support.
- 2.1.2 The Proposed 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 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.

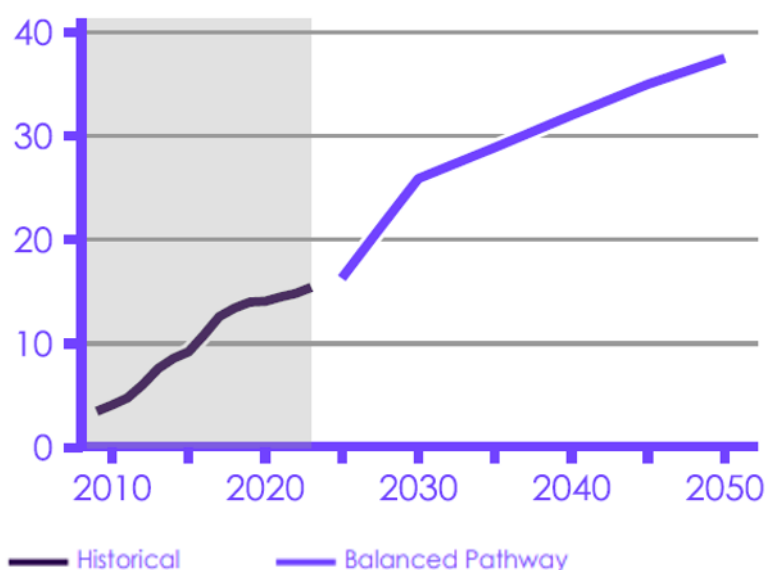
2.3.10 Page 12 of the CB7 states:

"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"*.

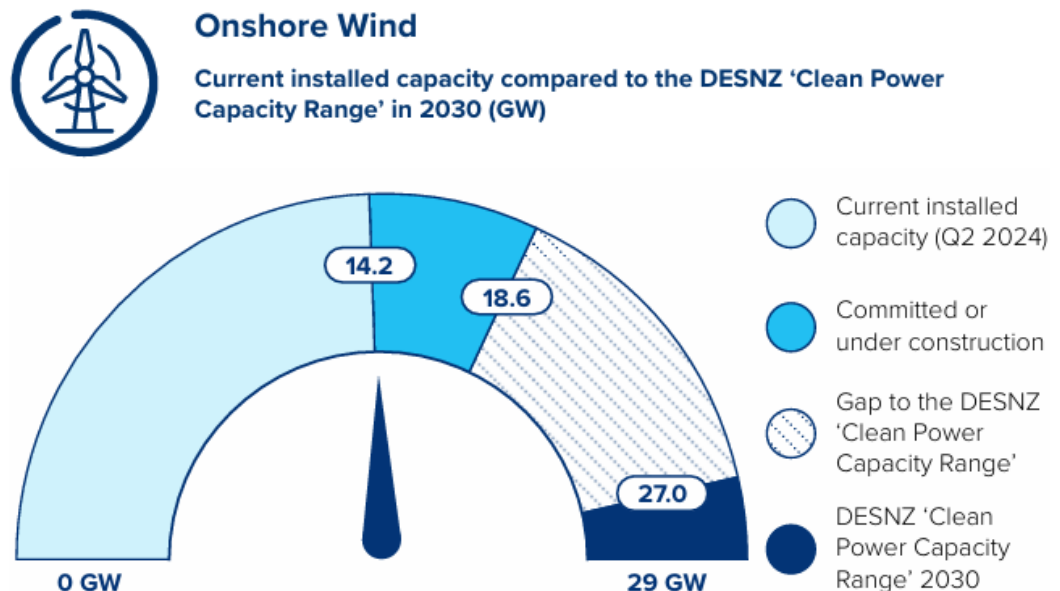
Labour Government & Commitment to Renewables (2024)

- 2.3.16 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.
- 2.3.17 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.
- 2.3.18 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)

- 2.3.19 The Clean Power 2030 Action Plan was published by DESNZ in December 2024. It sets out (page 9) that Britain needs to install "*clean sources of power at a pace never previously achieved*".
- 2.3.20 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".
- 2.3.21 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



- 2.3.22 Renewable UK's Onshore Wind Report⁴ indicates that at September 2025 the UK had 15.8 GW of onshore wind capacity in operation.

⁴ Renewable UK (2025) Onshore wind pipeline report 2025. Available at: <https://www.renewableuk.com/energypulse/reports/uk-onshore-wind-pipeline-report-2025/>.

- 2.3.23 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”.*
- 2.3.24 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”.*
- 2.3.25 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)

- 2.3.26 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.
- 2.3.27 The Ministerial Foreword by the Secretary of State for Energy Security and Net Zero states:
“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.”
- 2.3.28 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.”
- 2.3.29 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.
- 2.3.30 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.

2.3.31 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:

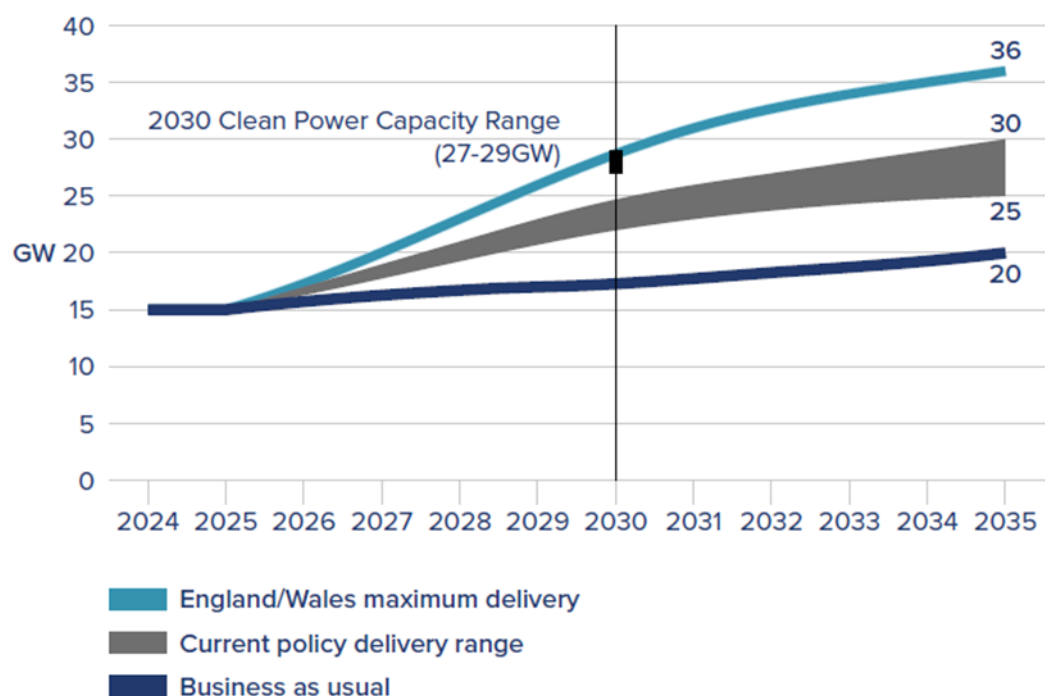
"All routes to achieving this mission are reliant on mass deployment of renewable electricity technologies, including onshore wind. The Clean Power Plan stated that to decarbonise the power sector by 2030, 27 to 29GW onshore wind will be needed within GB. That is a significant increase above the current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

2.3.32 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.

2.3.33 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.

2.3.34 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)



2.3.35 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.

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)

- 2.3.36 The former 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”.

Climate Change Committee Report to UK Parliament (June 2026)

- 2.3.37 The CCC published its report ‘Progress in reducing emissions – 2026 Report to Parliament’ (the ‘CCC 2026 Report’) in June 2026. The opening remarks of the Executive Summary note that overall, that *“the UK Government is not moving fast enough to reduce greenhouse gas (GHG) emissions and to protect households and businesses from volatile fossil fuel prices. The war in Iran has led to the second global fossil fuel price shock in just four years. In this uncertain geopolitical context, many countries are responding with plans to provide secure, homegrown energy by rapidly reducing dependency on fossil fuels. To do this in the UK, the Government needs a more ambitious plan to electrify the UK. This requires continued progress towards low-carbon electricity and an accelerated roll-out of electric vehicles (EVs), heat pumps, and industrial electrification.”* (Page 10)
- 2.3.38 Positive action on low carbon electricity is acknowledged but more is required in order to meet Government targets for 2030 and 2050.
- 2.3.39 The 2026 Report references the UK Government’s report ‘Carbon Budget and Growth Delivery Plan’ (‘CBGDP’) published in October 2025, which sets out its policies and plans for meeting carbon budgets. The CCC advise *“There is now a significant gap between the CBGDP’s projected emissions reductions and the UK’s 2030 Nationally Determined Contribution (NDC) under the Paris Agreement, a commitment to reduce emissions by at least 68% compared to 1990 levels. Increasing ambition and achieving the 2030 NDC would put the UK on track to achieve its future carbon budgets and Net Zero by 2050 and send a strong international signal of commitment to delivery.”*
- 2.3.40 The Report makes recommendations across a range of sectors to address the predicted shortcomings of the Government’s current plan. A key matter is the need to increase the rate at which low carbon electricity can be rolled out.
- 2.3.41 The 2026 Report examines the progress made across the key sectors including electricity supply. It states (page 21) that *“There has been positive progress in the electricity supply*

sector over the past year, with record amounts of renewable generation contracted. Important steps have been taken to remove planning barriers and reform the grid connections process. The UK is firmly on a path to a very low carbon electricity system by the start of the Sixth Carbon Budget period. However, there are policy risks to decarbonising electricity supply rapidly enough to achieve the 2030 NDC. These include ensuring sufficient renewable capacity and timely and cost-effective transmission network build.”

2.3.42 In relation to onshore wind, it is noted that 0.3 GW of new onshore wind capacity was added in 2025, bringing total UK capacity to 16.4 GW. In terms of the indicators for achieving the Government’s targets and net zero by 2050, the report highlights in relation to onshore wind that “Achieving government ambitions of 27–29 GW in Great Britain by 2030 will require average annual deployment of 2.1–2.5 GW up to the end of the decade. This is significantly higher than recent levels and exceeds the historical peak of 1.8 GW in 2017.” (Page 95)

2.3.43 The Report goes on to note that onshore wind typically has delivery times of around two to four years, which is notably shorter than offshore wind. There is potential for upcoming allocation rounds to expand the pipeline for 2030, but significantly more onshore wind capacity will be needed to achieve future targets.

The Report acknowledges the Government support for deployment of renewables in particular as part of AR7 which delivered record offshore wind and solar PV capacity, alongside a large volume of onshore wind projects. The CCC note that this “has improved our confidence in delivering the necessary emissions reduction in electricity supply. However, further capacity will need to be secured in upcoming allocation rounds to meet Government targets.” (Page 134)

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.

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

- 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.
- 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 18.1 GW⁶ of renewables operating capacity, a 3.2% increase compared to 17.6 GW at the end of the first quarter of 2025. Therefore, to achieve the Balanced Pathway figure of 66 GW by 2045 will require an additional 47.9 GW to be deployed. This would equate to approximately 2.5 GW of operating capacity coming online each year over the next 19 years. In terms of Onshore Wind, these most recent statistics from June 2026 indicate that onshore wind capacity grew by 0.4 GW between the first quarter of 2025 and the first quarter of 2026. While this is only a snapshot of one year, this is far removed from the rate of deployment recommended by the CCC.
- 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

⁶ Scottish Government (June 2026) Energy Statistics for Scotland – Q1 2026
<https://www.gov.scot/publications/energy-statistics-for-scotland-q1-2026/>

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 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.

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

- 2.4.16 The CCC produced a report to the Scottish Parliament entitled ‘Progress in reducing emissions in Scotland’ in February 2026 (‘CCC 2026 Report’).
- 2.4.17 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.
- 2.4.18 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.”
- 2.4.19 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)
- 2.4.20 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.”*
- 2.4.21 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)
- 2.4.22 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)
- 2.4.23 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)
- 2.4.24 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 Onshore Wind Policy Statement ('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 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.

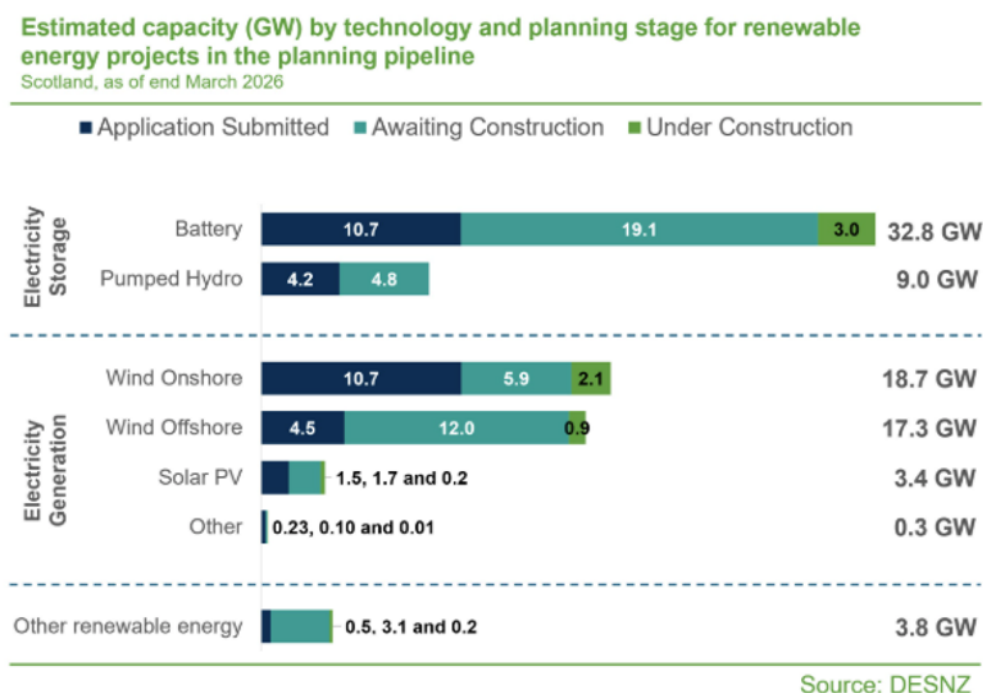
Onshore Wind Target & Development Pipeline

- 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 June 2026⁸ for Q1 of 2026. Figure 2 from the statistics illustrates that Scotland had 10.7 GW of installed onshore wind capacity as of the end of March 2026.
- 2.5.14 In terms of development pipeline, Figure 3 (reproduced below as **Figure 2.4**) illustrates that 18.7 GW of onshore capacity was at Application stage; Awaiting construction or Under construction. The majority of capacity, 10.7 GW, was at Application stage, with 5.9 GW Consented / Awaiting construction, and 2.1 GW Under construction.
- 2.5.15 This means that 12.8 GW of onshore wind is committed (i.e. operational and under construction). There are no guarantees that the 5.9 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.
- 2.5.16 It is also noted that in order to achieve a competitive element in terms of pricing benefits, there will be much more generation needed beyond the targets set out.

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 – Q1 2026 Available at: <https://www.gov.scot/publications/energy-statistics-for-scotland-q1-2026/>

Figure 2.4: Estimated Capacity (GW) by technology and planning stage for renewable energy projects in pipeline in Scotland as of end March 2026



Source – [Renewable Energy Planning Database](#) (accessed 29th June 2026)

2.5.17

Turning back to the OWPS, 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".

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 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 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 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"*.

2.5.26 The Onshore Wind Sector Deal was finalised and published in September 2023 and is referenced further below.

2.5.27 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.

2.5.28 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

- 2.5.29 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.
- 2.5.30 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.
- 2.5.31 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”.*
- 2.5.32 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)
- 2.5.33 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)
- 2.5.34 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.”*
- 2.5.35 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.

- 2.5.36 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"*.
- 2.5.37 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.
- 2.5.38 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.
- 2.5.39 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"*.
- 2.5.40 Section 3.7 relates to noise and makes reference to the 'The Assessment and Rating of Noise from Wind Farms' (Final Report, Sept 1996, DTI), (ETSU-R-97) which provides the framework for the measurement of wind turbine noise. All applicants are required to follow the framework and use it to assess and rate noise from wind energy developments.
- 2.5.41 On June 18, 2026, ETSU-R-97 was superseded by the Assessment and Rating of Wind Turbine Noise Guidance (ARWTNG). This has been taken account of in the EIA and it is noted that the approach set out by ARWTNG is not materially different from ETSU-R-97 and therefore the assessment findings remain unchanged.

OWPS Conclusions

- 2.5.42 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).
- 2.5.43 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..."*.
- 2.5.44 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.

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

The Onshore Wind Sector Deal

- 2.5.45 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 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.
- 2.5.46 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.”*
- 2.5.47 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.”*
- 2.5.48 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.
- 2.5.49 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).
- 2.5.50 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.”*
- 2.5.51 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

2.5.52 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 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.

2.5.53 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."

2.5.54 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.
- > 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.

2.5.55 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".

2.5.56 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....."

The Green Industrial Strategy

2.5.57 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".

2.5.58 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.

2.5.59 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."*

2.5.60 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."

2.5.61 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.

2.5.62 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.

2.5.63 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."

- 2.5.64 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 (2026)

- 2.5.65 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, and provide a clear pathway towards Scotland achieving net zero by 2045.
- 2.5.66 The CCP sets out average reductions in GHG emissions (compared to 1990 baseline) for each five-year period:
- > 57% lower than baseline levels for the First Carbon Budget (2026 to 2030).
 - > 69% lower than baseline levels for the Second Carbon Budget (2031 to 2035).
 - > 80% lower than baseline levels for the Third Carbon Budget (2036 to 2040).
 - > 94% lower than baseline levels for the Fourth Carbon Budget (2041 to 2045).
- 2.5.67 These budgets provide a "pathway" toward net zero by 2045, and the Plan is designed to ensure policies are in place to meet them.
- 2.5.68 The CCP 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.
- 2.5.69 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.
- 2.5.70 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.”

- 2.5.71 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)
- 2.5.72 The publication of the CCP demonstrates the continued commitment and needs case for delivering additional renewable energy capacity.

2.6 Conclusions on the Renewable Energy Policy & Legislative Framework

- 2.6.1 It is considered that the Proposed 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 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. This expected substantial increase in electricity demand is also highlighted in the OWPS.
- 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 Section 36 wind farm decisions. 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.”

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

- 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 It must follow that the need case for the Proposed 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 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.

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

3. The Benefits of the Proposed Development

3.1 The Benefits: Summary

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

Renewable Energy Generation & Emissions Savings

- > With a wind energy generating capacity of up to 30 MW of onshore wind the Proposed Development would make a valuable 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.
- > Using an estimate of 20 MW (assuming a conservative 5 MW turbine rating) of installed capacity for the Proposed Development, it would produce an average of approximately 70,000 megawatt-hours ('MWh') of electricity annually (based on a Site derived capacity factor of 40%). This equates to the equivalent electricity consumed by approximately 21,000 average UK households¹².
- > 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 Development is estimated to save up to 38,931 tonnes of CO₂e per year, through the displacement of grid electricity, based on the current fossil fuel grid mix and up to 15,381 tonnes of CO₂ per year over a grid-mix of electricity.
- > The calculations of total carbon dioxide emission savings and payback time for the Proposed Development indicates the overall payback period of a development with 4 wind turbines with an expected installed capacity of around 6.2 MW each, would be approximately 1.2 years (14 months), when compared to the fossil fuel mix of electricity generation or 2.9 years (33 months) when compared to a grid mix of electricity¹³.
- > The earlier that steps towards decarbonisation are introduced, the greater their contribution to limiting climate change. The Proposed 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

- > 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.

¹² Calculated using the most recent statistics from DESNZ showing that annual GB average domestic household consumption is 3,323kWh (as of December 2025).

¹³ This could vary depending on the final candidate turbine which could range between 5MW and 7.5MW per turbine.

- > 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 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 Development to make an important contribution to Scottish and wider UK energy security and decarbonisation needs.

Socio-Economic Benefits

3.1.2

The Proposed 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 Cairnoch Hill Wind Farm** is submitted in support of the application. A summary of the key impacts are as follows:

- > It is estimated that during the development and construction phase, which is expected to cost approximately £47.2 million, Cairnoch Hill Wind Farm could generate:
 - £2.4 million Gross Value Added ('GVA') and support 28 years of employment in Stirling; and
 - £13.7 million GVA and 151 years of employment in Scotland.
- > During development and construction, the main opportunities for local suppliers would be related to the balance of plant contracts, including plant hire, civil engineering and construction, fencing, and other skilled trades activities.
- > On average in each year of its 40-year operational life, Cairnoch Hill Wind Farm is expected to generate:
 - £0.5 million GVA and 2 jobs in Stirling; and
 - £1.2 million GVA and 7 jobs in Scotland.
- > The Proposed Development will also support the delivery of local services through the annual payment of at least £0.4 million in non-domestic rates, anticipated to accumulate to around £15.3 million across its 40-year operational lifespan.

3.1.3

This topic has been examined further in terms of the Proposed Development's accordance with NPF4 Policy 11 in Chapter 4 of this Planning Statement.

Community Benefits

- > The Applicant is committed to a community benefit fund in line with Scottish Government recommended rate at the time of commissioning the Proposed Development.
- > Based on the current guidance of £5,000/MW, and depending on the final installed capacity, which will depend on the final turbine chosen, the Proposed Development could generate between approximately £4 million and £6 million over the 40-year life of the wind farm.

Biodiversity Enhancement

- > Significant biodiversity enhancements are proposed as set out in an Outline Habitat Management Plan ('OHMP') (**Technical Appendix 8.6 of the EIA Report**). The vision and scope of the Outline HMP is to enhance, restore, and create 68.27ha of habitat onsite for protected woodland mammals and birds, while also connecting and maintaining resources

for vulnerable and rare flora and fauna within the site. The details of the proposed measures relating to biodiversity enhancement are referenced in Chapter 4 of this Planning Statement in the context of NPF4 Policy 3 (Biodiversity).

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. Section 25 of the 1997 Act requires that decisions on planning applications are made in accordance with the adopted Development Plan, unless material considerations determine otherwise.

4.1.4 Section 13 of the Planning (Scotland) 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 for the time being applicable to the area.

4.1.5 The statutory Development Plan covering the site consists of NPF4 and the Stirling Local Development Plan ('LDP') (2018) and relevant Supplementary Guidance ('SG').

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.

4.1.7 In this case, the Stirling LDP was adopted in October 2018, a significant period of time prior to NPF4 coming into force. The Council is in the process of preparing the next LDP on a timetable that could see its adoption in 2028.

4.1.8 A number of statutory SG documents are relevant to the proposal. Supplementary Guidance does not make, replace, or amend LDP policy, but should be read in conjunction with the LDP and relevant policies, it is a material consideration in the determination of applications and appeals, and forms part of the LDP. These are referenced in Chapter 5 below.

How NPF4 is to be used

4.1.9 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."

4.1.10 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."

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'.

- 4.1.11 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).
- 4.1.12 NPF4 therefore for the first time, introduces centralised development management policies which are to be applied Scotland wide.
- 4.1.13 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 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."*

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.

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

- 4.2.6 Six National Developments ('NDs') support the delivery of sustainable places, one being 'Strategic Renewable Electricity Generation and Transmission Infrastructure'.
- 4.2.7 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".
- 4.2.8 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."
- 4.2.9 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 Although the Proposed Development is not National Development it is nevertheless important for the delivery of the national Spatial Strategy, contributing substantive renewable energy (up to 30 MW export capacity of wind) and supporting the grid.

4.3.8 The 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.

4.4 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 Development include the following:

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

- > 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”.

The application of Policy 1

4.5.7 Given the nature of the Proposed 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.

4.5.8 The point is made later in this appraisal against NPF4 that it is important to recognise that one of the greatest threats to biodiversity is climate change. The principal and essential benefit of the Proposed Development is its 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.

4.5.9 In the Reporters' overall conclusions in the Supplementary Report of Inquiry¹⁷ for the Shepherds Rig Wind Farm 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 Development would further contribute to tackling the climate crisis.

4.5.10 The Reporter's comments on this particular policy in the Sanquhar II Inquiry Report¹⁸ 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."

4.5.11 Furthermore, as explained below with reference to NPF4 Policy 3, biodiversity enhancement measures are proposed as part of the Proposed 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;*
- ii. enabling works, such as grid transmission and distribution infrastructure;*
- iii. energy storage, such as battery storage and pumped storage hydro;*

¹⁷ Shepherd's Rig, Section 36 Decision dated 21 August 2023, Supplementary Report of Inquiry dated 2 March 2023 (Case Reference WIN-170-2005).

¹⁸ Sanquhar II, Section 36 Decision dated 31 August 2023, Supplementary Report of Inquiry dated 20 February 2023 (Case Reference WIN-170-2006).

- 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 Development would deliver.
- 4.6.5 The wording of Policy 11(a)(i) makes it clear that the policy supports new wind farms of all scales and types.
- 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 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 Development have been set out in Chapter 3 and in a separate Socio-Economic Impact Assessment. The Applicant has made commitments and actions relating to supply chain development, skills development, the empowerment of communities and balancing the development with environmental protection and enhancement.
- 4.6.9 The economic activity, and the commitments outlined within the Socio-Economic Impacts Assessment will contribute to the human, economic, social and natural capital of Stirling. This will increase the resilience of these communities and support their long-term economic development. It has therefore been demonstrated that the Proposed Development would maximise net economic impact, including local and community socio-economic benefits.
- 4.6.10 **Paragraph d) of Policy 11** states that development proposals that impact on international and national designations *"will be assessed in relation to Policy 4"*.
- 4.6.11 Policy 4 also deals with impacts in relation to local landscape designations. Therefore, the matter of the impacts of the Proposed Development in relation to such (international, national and local) designations is examined further below with specific regard to the provisions of NPF4 Policy 4.
- 4.6.12 **Paragraph e) of Policy 11** states that *"in addition, project design and mitigation will demonstrate how the following impacts are addressed..."*
- 4.6.13 These "impacts" are listed in the quotation of the policy above and the 13 topics are addressed in turn below. It is noted that the cumulative effects of the Proposed Development have been assessed in the EIA under two scenarios: The consented scenario; and the application-stage scenario. Where cumulative considerations are relevant the findings of the EIA have been set out below under the individual topic sections.

(i) Impacts on Communities and Individual Dwellings - Residential Visual Amenity

- 4.6.14 The settlements and residents most likely to be affected by the Proposed Development are those that are shown on the zone of theoretical visibility ('ZTV') plans to gain higher levels of visibility and generally lie in relatively close proximity. The closest residents that are subject to theoretical visibility of the Proposed Development are located along the minor roads in the local area, but there are also some more distant settlements that may receive visibility of the proposed wind turbines.
- 4.6.15 Two settlements of Fintry (approximately 6.8 km distant) and Balfron (approximately 13.3 km) have been considered for detailed assessment as part of the landscape and visual impact assessment ('LVIA'). It is explained in Chapter 7 Landscape and Visual of the EIA Report that the effect of the Proposed Development on views from Fintry would be at worst moderate and not significant when experienced from a few of the properties at the south-eastern edge of the village and Fintry Kirk, but there would be no change in reality to views experienced across the majority of the village due to a combination of an absence of theoretical visibility and screening from intervening buildings and woodland. In relation to Balfron, it is predicted that there would be no effect on views from Balfron due to the extent of woodland screening, but in the unlikely event that views are experienced the effects experienced by residents would be at worst minor and not significant.

- 4.6.16 Residential properties situated within 2km of the proposed wind turbines are included in the Residential Visual Amenity Assessment ('RVAA') which was undertaken and is contained in **Technical Appendix 7.2** of the EIA Report. Individual properties have been assessed in detail with respect to Residential Visual Amenity Threshold ('RVAT').
- 4.6.17 The RVAA details the assessments for six property groups (18 individual properties) that have been evaluated through the assessment. It is noted that four of the residential properties are financially involved in the Proposed Development (Cairnoch Lodge, Easter Cringate, Cairnoch Farm and Cairnoch Bothy).
- 4.6.18 The RVAA indicates that four of the six property groups assessed are likely to experience a significant visual effect as a result of the Proposed Development. Of these properties, only one (Todholes Farm) would have a high magnitude of change, with screening from intervening landform and forestry/ woodland reducing the magnitude of change at the other properties to medium-high and below.
- 4.6.19 An assessment of whether the RVAT would be reached was undertaken for Todholes Farm and the assessment concluded that effects would not reach the RVAT due to a number of factors including the moderate horizontal field of view that the Proposed Development (approximately 20°) would extend across, the extent of landform screening to Turbines 3 and 4, the intervening distance between the property and the proposed turbines which places the property at the outer edge of the RVAA Study Area, and the relatively simple design composition. As a result of these factors, the Proposed Development will appear as prominent features in the wider landscape, but they would not be overbearing or overwhelming.
- 4.6.20 Overall, the RVAA concludes that residents would not experience an overbearing or overwhelming effect on their visual amenity such that the RVAT would be breached. No property would therefore experience effects that it would be considered an unattractive place in which to live.
- (i) Impacts on Communities and Individual Dwellings - Noise and Shadow Flicker**
- 4.6.21 **Chapter 13 Noise** of the EIA Report considers the potential construction and operational noise impacts of the Proposed Development.
- 4.6.22 The assessment concludes that predicted construction noise levels indicate that construction noise levels are below the guideline¹⁹ levels considered acceptable at all residential receptors across the construction timeline and therefore the construction noise effects are not significant.
- 4.6.23 The guidance contained within Assessment and Rating of Wind Turbine Noise (ARWTN) published in June 2026, was used to assess the likely operational noise impact of the Proposed Development. Predicted levels indicate that for dwellings neighbouring the Proposed Development, wind turbine noise would meet the noise criteria established in accordance with ARWTN, therefore the operational noise effects are not significant.
- 4.6.24 The results of the likely cumulative operational wind farm noise assessment show that the Proposed Development can operate concurrently with all other operational, consented, and proposed developments in the area. As such, cumulative operational noise is Not Significant.
- 4.6.25 **Chapter 15 Other Issues** 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 five identified receptors within the Study Area. Calculations have shown the Proposed Development is predicted to cause shadow flicker effects in excess of 30 hours per year for two properties within the 1,670m Study Area under the worst-case scenario. When the likely-case scenario is applied, accounting for the average sunshine hours, shadow flicker

¹⁹ BS 5228-1: 2009+A1:2014 'Code of practice for noise and vibration control on construction and open developments - Noise'

effects in excess of 30 hours per year are not predicted to occur at any receptors within the shadow flicker Study Area.

- 4.6.26 Therefore, under the likely-case scenario, there would be no significant effects in relation to shadow flicker as a result of the Proposed Development.
- 4.6.27 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 SC. This would set out the protocol to be followed should a shadow flicker complaint be received from a receptor within the Study Area, and potential mitigation measures should that complaint be upheld following investigation. Mitigation may include shutting down individual wind turbines during periods when shadow flicker is modelled to occur and the climatic conditions are such that shadow flicker can be experienced.
- 4.6.28 Under the likely scenario, the residual effect of shadow flicker is assessed as not significant for all receptors during the operational phase of the Proposed Development.

(ii) Landscape and Visual Considerations

- 4.6.29 As noted, **Chapter 7 Landscape and Visual** of the EIA Report contains a LVIA which should be referred to for its detail, however summary findings are set out below.

Overall Design Approach

- 4.6.30 Overall, the siting and design of turbines has sought to minimise where possible the impact of the Proposed Development on the landscape and visual resource. The approach to design evolution which has been followed is set out in **Chapter 2 Design Evolution and Alternatives** of the EIA Report.
- 4.6.31 The following general design principles and embedded mitigation were adopted during the design iterations made by the Applicant to ensure that the final design of the Proposed Development was the most suitable for the site. Those in bold below were focused around landscape and visual considerations:
- > Ensuring the size and scale of the development are appropriate for its location;
 - > **Designing access tracks to reduce the need for extensive earthworks, which helps limit ecological, hydrological, and landscape and visual impacts;**
 - > **Utilising existing infrastructure at the Site e.g. tracks and borrow pits, where possible;**
 - > **Sensitive siting of the proposed infrastructure incorporating appropriate buffer distances from environmental receptors (including nearby residential properties) to avoid or reduce effects;**
 - > **Considering the appearance, finish, and colour of wind turbines and control buildings in line with NatureScot's guidance on wind farm siting and design (Siting and Designing Wind Farms in the Landscape Guidance, 2017);**
 - > Incorporating borrow pits into the Proposed Development to reduce the need for importing materials to the Site; and
 - > Potential for up to 50m micro-siting of infrastructure during construction to ensure the best possible location is chosen based on Site investigations.

In addition to embedded mitigation, there are several design principles which have been incorporated into the design of the Proposed Development. These are:

- > **Single row of wind turbines in order to allow 'clean' and balanced view;**
- > **Wind turbines to be pushed north away from reservoir and associated LCT; and**

- > **Avoid wind turbines appearing at excessively different heights to each other (as a result of topography).**

4.6.32 The Proposed Development layout which has been reached has been informed by a robust design iteration process, taking into account potential environmental impacts and their associated effects to reach a Proposed Development which is deemed appropriately designed for its location and acceptable in environmental and planning terms.

Landscape Character

4.6.33 The Proposed Development is located in the 7d. Lowland Hills – Fintry, Gargunnock and Touch Hills Landscape Character Type ('LCT'). Following review of LCTs within the Detailed LVIA Study Area it was indicated that the following additional LCTs have the potential to undergo significant effects from the Proposed Development:

- > 3. Forested River Basin - Carron Valley;
- > 7d. Lowland Hills - Fintry, Gargunnock and Touch Hills;
- > 216. Rugged Moorland Hills;
- > 7c. Lowland Hills - Campsie Fells;
- > 149. Lowland Hills – Central;
- > 2. Rolling Valley Farmland - Middle Endrick Water; and
- > 2. Rolling Valley Farmland - Lower Endrick Water.

4.6.34 Significant adverse effects are not predicted for the remaining LCTs in the study area.

4.6.35 The LVIA explains that there is potential for significant effects to arise upon the landscape character of the site and some of its surroundings, including parts of the 3. Forested River Basin - Carron Valley LCT, 7c. Lowland Hills - Fintry, Gargunnock and Touch Hills LCT, and 216. Rugged Moorland Hills LCT.

4.6.36 In addition, significant cumulative effects are predicted in the consented and application-stage cumulative scenarios where conifer forestry does not provide a strong degree of enclosure for parts of the landscape character. The LCTS affected include the 7d. Lowland Hills - Fintry, Gargunnock and Touch Hills LCT unit, the 3. Forested River Basin - Carron Valley LCT unit, the 216. Rugged Moorland Hills LCT unit, and the 149. Lowland Hills – Central LCT. The assessment explains that significant effects in landscape character terms would extent to approximately 6-7km for one LCT (216 Rugged Moorland Hills) with lesser extents for others. The effects on landscape character are therefore considered to be localised in extent.

Designated Landscapes

4.6.37 The Application Site is located within a local landscape designation, the Southern Hills Local Landscape Area ('LLA'), which is a local landscape designation. Various other nationally and locally designated areas are found in the LVIA Study Area.

4.6.38 The Loch Lomond and The Trossachs National Park ('LLTTNP') is the only National Park ('NP') in the Study Area located over 16 km from the site. The LVIA explains that a detailed assessment of the effects of the Proposed Development on the LLTTNP is not required due to the limited extent of visibility predicted (as illustrated in ZTV mapping **Figure 7.10a** of the EIA Report), its distance from the Proposed Development, and the location of the Proposed Development within a part of the setting that already contains an influence from other operational wind farm development.

4.6.39 There are three National Scenic Areas ('NSAs') in the 45km Study Area: Loch Lomond (approximately 21 km distant), The Trossachs (approximately 21 km), and River Earn (Comrie to St Fillans) (approximately 34 km). A detailed assessment of the effects of the Proposed Development on these NSAs was also not deemed to be required due to the

limited extent of visibility predicted, their distances from the Proposed Development, and the location of the Proposed Development within a part of their setting that already contains an influence from other operational wind farm development.

- 4.6.40 In summary, no significant effects would arise upon the special qualities of any NPs or NSAs as a result of the introduction of the Proposed Development.
- 4.6.41 In relation to local landscape designations, these relate to: Southern Hills LLA (~0 km), Kilsyth Hills Special Landscape Area ('SLA') (approximately 1 km), Denny Hills SLA (approximately 3 km), and Campsie Fells LLA (approximately 3km). All other local landscape designations located within the Study Area were discounted from the detailed assessment in the LVIA due to a combination of absence or limited theoretical visibility and their distance from the Proposed Development.
- 4.6.42 The assessment concludes that a small number of the Special Landscape Qualities ('SLQs') of the Southern Hills LLA and the Kilsyth Hills SLA would be significantly affected as a result of the Proposed Development. However, the assessment concludes in relation to each as follows:
- > Southern Hills LLA: **significant effects** of up to a major-moderate and major level are predicted upon three of the LLA's SLQs relating to "*Diversity of landscape experience...*", "*Hills...*" and "*Valleys...*", which would be experienced primarily across large areas of Carron Valley. Effects upon other aspects of the SLQs would be of a moderate-minor or lower level, and as a consequence they would not be significant. While the Proposed Development would have a significant effect on aspects of three of the LLA's SLQs, it is explained in the LVIA that theoretical visibility of the Proposed Development from the LLA is variable, and parts of the LLA would gain no, negligible, or low visibility and influence of the Proposed Development. This ensures that the magnitude and geographical impact of these significant effects would be localised and not sufficient to undermine the integrity of the designation.
 - > Kilsyth Hill SLA: significant effects of up to a moderate level are predicted upon one of the LLA's SLQs relating to "*Diversity of views...*", which would be experienced from some elevated hill summits, such as Laird's Hill, Garrell Hill, and Tomtain. There would be no effect upon other aspects of the SLQs, and as a consequence they would be not significant. While the Proposed Development would have a significant effect on an aspect of one of the LLA's SLQs, it is explained in the LVIA that theoretical visibility of the Proposed Development from the LLA is variable, and parts of the LLA would gain no, negligible, or low visibility and influence of the Proposed Development. This ensures that the magnitude and geographical impact of these significant effects would be localised and not sufficient to undermine the integrity of the designation overall.
- 4.6.43 There are two Wild Land areas ('WLAs') located within the 45km LVIA Study Area. WLA 07: Ben More – Ben Ledi is situated approximately 24 km to the north-west of the Proposed Development, and WLA 04: Waterhead Moor – Muirshiel is situated approximately 44 km to the south-west. Through the request for an EIA Scoping Opinion, it was agreed that these WLAs would be discounted from the LVIA owing to a combination of the limited visibility predicted, the large separation distance from the Proposed Development, and intervening development between the Proposed Development and the WLAs.

Visual Effects

- 4.6.44 It is explained in the LVIA that there would be **significant visual effects** for a number of visual receptors. These include:
- > Views experienced by residents of the hamlet of Carron Valley and those from a small number of the closest residential properties;
 - > Views experienced by recreational walkers from some hill summits, notably Tomtain and Meikle Bin;
 - > Views experienced by road users along some of the closest sections of the B818 and B822 roads;

- > Views experienced by recreational users of sections of the following core paths: EK/1439/1, EK/1444/1, EK/1455/1, IV18, and IV19; and
- > Views experienced during daytime by residents, road users, and recreational walkers, at Viewpoints 1, 2, 4, 5, 6, 7, and 18; and
- > Views experienced at night-time by residents and road users at Viewpoints 1-12 and 18 as a consequence of aviation lighting when considering the existing baseline, which does not include the consented Shelloch Wind Farm.

4.6.45 In the cumulative scenario, significant effects are also predicted for views experienced by recreational walkers from Viewpoint 4 (Carron Valley Reservoir Shore Trail), 6 (Tomtain), and 7 (Meikle Bin) in the consented and application-stage cumulative scenarios; and views experienced by residents and road users from Viewpoint 5 (Minor road, near Easter Cringate Cottage) in the application-stage cumulative scenario only.

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

4.6.46 As is to be expected with wind energy developments of commercial scale, the LVIA confirms that the Proposed Development would result in some significant effects, but such effects would be localised on aspects of the landscape and visual resource at distances of up to approximately 6-7km from the Proposed Development. It is considered that these effects would be likely to be comparable in nature if micro-siting is undertaken within a 50m distance of the current wind turbine locations.

4.6.47 The LVIA explains that it is important to note that assessments of this type tend to focus on those locations and receptors where significant effects may arise, and there are large parts of the Detailed Study Area where ZTVs show that there would be no visibility, or limited visibility, of the Proposed Development.

4.6.48 There has been a clear process of embedded design mitigation in reaching the final layout and design to minimise impacts.

4.6.49 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’.

4.6.50 In the Chleansaid 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.”

4.6.51 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.”

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

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

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

4.6.53 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.”*

4.6.54 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.

(iii) Public Access

4.6.55 The LVIA has addressed visual amenity considerations in relation to public access and recreation as referenced above with regard to visual impacts.

4.6.56 **Technical Appendix 15.2 Outline Access Management Plan** (‘AMP’) includes detail on how access within and around the site will be managed during construction and operation of the Proposed Development.

4.6.57 The Site is currently part of an operational commercial forest, managed by FLS, non FLS vehicle access to the Site is prohibited and controlled via locked gates. During construction of the Proposed Development, these restrictions to vehicular access (i.e. vehicles not associated with construction of the Proposed Development, or FLS operations) would continue.

4.6.58 Appropriate access restrictions will be in place during the construction period with appropriate signage in place.

4.6.59 Within the Site boundary there are no Public Rights of Way which would be affected by the construction of the Proposed Development. The Site does however have multiple forestry tracks crossing it, which are used by the public for recreational purposes. Some would have access restrictions and closures applied during the construction phase, as some existing tracks are to be widened, but also while certain key operations are ongoing e.g. wind turbine blade delivery.

4.6.60 Closures and restrictions on public usage of the forestry tracks would be temporary and only in place at appropriate points during construction of the Proposed Development. Once the construction phase has completed, the public would have the same access rights across the Site that they currently have.

4.6.61 Following completion of the final phase of construction works and erection of all wind turbines, public access by non-motorised transport modes onto the Site would be reinstated in all areas of the Site with the exception of areas deemed unsafe, including the substation compound.

4.6.62 The Proposed Development has considered public access and can be suitably managed with final details set out in the final AMP.

(iv) Aviation, Defence Interests and Telecommunications

4.6.63 **Chapter 14** of the EIA Report considers the potential effect on aviation and defence interests. It concludes that the likely effects of the Proposed Development on aviation operations are very limited.

4.6.64 The assessment concludes that there is the potential for the turbines to create interference on the NATS Lowther Hill radar infrastructure and on the Edinburgh Airport radars which could result in ‘clutter’ on the controllers’ radar screens and involve vectoring aircraft clear of the presented interference. With mitigation proposed those effects should be removed and there should be no residual radar effects during the operational phase.

4.6.65 The Proposed Development would be located within Low Flying Area (‘LFA’) 16 which is considered by the Ministry of Defence (‘MoD’) to be an area of importance for low flying

training. While the proliferation of turbines within LFA 16 is a general concern for the MoD regarding military low flying operations in this region, they have not objected but have expressed concerns regarding the presence of the turbines as a physical obstruction to low flying.

- 4.6.66 The lighting layout planned for the Proposed Development will include MoD infra-red lighting and this will be presented to the MoD for approval. Additionally, the turbines would be annotated on aviation charts of the area.
- 4.6.67 With these measures in place there should be no residual effect on low flying as a result of the Proposed Development during the operational phase.
- 4.6.68 It is explained in the aviation assessment that the Proposed Development may have an effect on the procedures at Glasgow Airport. If required, an Instrument Flight Procedure ('IFP') assessment will be conducted to determine if alterations are required to the airport procedures. If changes to airport procedures are needed then, when implemented, the residual effect is predicted to be negligible.
- 4.6.69 In relation to Cumbernauld Airport, there would be no effect on operations at the airport. The Application Site is outside of the Air Traffic Zone surrounding the airport and outside of the stipulated consultation distance, as detailed in CAP 764²².
- 4.6.70 Furthermore, the extent to which any vertical obstacle can become an en-route obstacle/navigational hazard is a matter for the CAA. The wind turbines would be lit in accordance with both CAA and MoD lighting requirements which will mitigate any such effect.
- 4.6.71 **Chapter 15 Other Issues** of the EIA Report addresses the potential effect on telecommunications and television reception. None of the telecoms operators consulted with have fixed links crossing the Site. The nearest fixed infrastructure identified in the survey is at Earl's Hill, which is 3.3 km from the Proposed Development.
- 4.6.72 There are no effects predicted from the Proposed Development on telecommunications infrastructure operated by the operators consulted. Therefore, effects on telecommunications infrastructure, from the Proposed Development, as a result of the Proposed Development are concluded to be not significant.
- 4.6.73 The Proposed Development is considered to accord with the relevant policies as identified above with respect to aviation and telecommunications matters.

(vi) Impacts on Road Traffic and Trunk Roads

- 4.6.74 **Chapter 12** of the EIA Report has considered the traffic and transport impacts associated with the Proposed Development. The construction phase will result in increased traffic volumes on the number of roads in the vicinity of the Proposed Development, however these will be of a temporary timescale and transitory in nature. It should be noted that the assessment assumes that all aggregate required for construction would be imported by road from off-site quarries. Should the proposed on-site borrow pit provide suitable stone, then less stone would need to be imported by road from off-site quarries and hence there would be fewer vehicle movements and lesser effects. Standard mitigation measures are proposed including a Construction Traffic Management Plan ('CTMP'). No significant effects are predicted from the increased traffic volumes reported.
- 4.6.75 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 negligible or minor and will occur during the construction phase only, they are temporary and reversible.
- 4.6.76 The number of vehicle movements during the operation and decommissioning of the Proposed Development would be lower than those during construction and hence no significant effects are expected on users of the transport network during those phases.

²² CAA Policy and Guidance on Wind Turbines (2025)

(vii) Historic Environment

- 4.6.77 **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 Development.
- 4.6.78 In summary, significant adverse effects in relation to setting are limited to three designated heritage assets as a result of the Proposed Development. During operation, impacts on the setting of Sir John de Graham's Castle (SM4278), Todholes, cairn 1000m NNE of (SM2492), and Todholes, cairn 1300m NNW of (SM4491) were assessed as moderate, which is considered significant in EIA terms.
- 4.6.79 There are four non-designated heritage assets located within the Site boundary that have the potential for direct (physical) impacts as a result of the proposed development. The significance of effect on these assets as a result of direct impacts is anticipated to be negligible, which is not significant in EIA terms. It is explained in the assessment that there is the potential for unknown remains of all periods within the site, however, due to the commercial forestry likely removing any archaeological context any unrecorded remains within areas of construction would be of negligible significance. The significance of effect on these assets would be minor and not significant. Where relevant, a programme of mitigation, primarily comprising demarcation and archaeological recording of assets prior to construction works, has been proposed for all assets at risk of direct physical impacts.
- 4.6.80 Effects in relation to the historic environment are examined in more detail below in terms of NPF4 Policy 7 (Historic assets and places).

(viii) Hydrology, the Water Environment and Flood Risk

- 4.6.81 **Chapter 10 Hydrology, Hydrogeology, Geology and Soils** of the EIA Report assesses the potential and residual effects on surface water, groundwater, peat, soils, and geological resources.
- 4.6.82 It is explained in the assessment that there are no designated sites within the Study Area however the Endrick Water, approximately 2 km west of the Site, has been designated as part of the Endrick Water Site of Special Scientific Interest ('SSSI') and Special Area of Conservation ('SAC'). The SSSI and SAC have been designated for salmon, brook and river lamprey, fluvial geomorphology and quaternary rock outcrops and vascular plants. The Endrick Water SSSI and SAC is located within the same surface water catchment as the Proposed Development and therefore hydrologically connected to the Proposed Development. The assessment confirms that no development is proposed within 50m of the watercourses within the Endrick Water surface water catchment, reducing the potential risk for a pollution event or increased sediment loads to occur within the watercourses in this catchment during construction. Good practice construction techniques to protect the quality and quantity of surface water and groundwater receptors, in combination with the proposed monitoring programme is proposed will be set out in the CEMP. During operation, the good practice measures set out in the final CEMP, would be adopted through a longer-term Operational Environmental Management Plan ('OEMP'). The resultant significance of effect is assessed as negligible and not significant.
- 4.6.83 The flood risk screening undertaken indicates potential for flooding from surface water and small watercourses and flooding due to a dam breach.
- 4.6.84 Subject to adoption of a detailed drainage design, which incorporates the use of Sustainable Urban Drainage ('SuDS') and an appropriate management of the drainage system no increase in flooding is expected as a result of the Proposed Development.
- 4.6.85 In relation to the dam, SEPA reservoir inundation flood mapping confirms that the north-eastern boundary of the Site, near the Earls Burn, is at risk from three breach scenarios from reservoir flooding. Modelled flood extents are shown to be confined to the watercourse corridor of the Earls Burn and no element of the Proposed Development is shown to be at risk from flooding from the breach scenarios.

- 4.6.86 Areas of potential Ground Water Dependent Terrestrial Ecosystems ('GWDTE') have been identified within the Site by National Vegetation Classification ('NVC') mapping, however, it has been confirmed that these are likely to be sustained by surface water rather than groundwater or will not be impacted by the Proposed Development.
- 4.6.87 It is concluded that the potential GWDTE habitats are not sustained by groundwater. However, safeguards to maintain these habitats, and sustain the surface water flows and preserve water quality to these habitats, will be implemented during construction and operation of the Proposed Development.
- 4.6.88 None of the Private Water Supplies ('PWS') sources within the Study Area that have been assessed are at risk from the Proposed Development. Details of the two potential PWS properties are currently unconfirmed, and it is confirmed that the location of any PWS sources will be confirmed as part of a planning condition prior to the commencement of works. It is confirmed that no infrastructure is proposed within 100m of the PWS sources and a commitment has been made to maintain this buffer in the proposed micro-siting allowance.
- 4.6.89 The Endrick Water and Carron Valley Reservoir catchments have been designated as strategically important Drinking Water Protection Areas ('DWPA'). The assessment concludes that with the good practice construction techniques to protect the quality and quantity of surface water within the DWPA catchments, in combination with the proposed monitoring programme, that no significant effects are predicted on the DWPA. Measures will be adopted through the OEMP to ensure that the existing surface water quality and quantity is maintained throughout the operation of the Proposed Development.
- 4.6.90 Overall, therefore, with the proposed mitigation in place there are no significant adverse effects predicted on hydrology, the water environment or from flood risk.

(ix) Biodiversity

Ornithology

- 4.6.91 **Chapter 9** of the EIA Report considers the Proposed Development's potential impact on birds.
- 4.6.92 Two designated sites of ornithological interest have been identified within 20 km of the Site – the Forth of Firth SPA and Slamannan Plateau SPA located 12.7 and 14.6 km from the Site, respectively. As no species associated with these sites were recorded, there was no evidence of any connectivity.
- 4.6.93 The baseline surveys recorded 10 species of Important Ornithological Features ('IOFs'), with three (osprey, goshawk, and red kite) found in a significant proportion of the National Heritage Zone ('NHZ') 17 population. Nightjar was not recorded during baseline surveys, but Forestry Land Scotland ('FLS') provided a record of two churring males from 2025, which represents 7.5% of the Scottish breeding population, so were scoped in for assessment.
- 4.6.94 Potential effects on these features due to habitat loss, displacement/disturbance, barrier effects, and collision risk were considered for the construction and operational phases of the Proposed Development.
- 4.6.95 Habitat loss, displacement/disturbance, and barrier effects to breeding and foraging birds during the construction and operational phases would be minimal following the implementation of the embedded mitigation measures, such as a Bird Protection Plan.
- 4.6.96 Collision risk to osprey has the potential for a significant impact. However, additional mitigation and/or enhancement (removing the damaged osprey nest and erecting an artificial nest platform further from the proposed turbine locations) would likely reduce the impact.
- 4.6.97 Therefore, overall, the assessment concluded that significance of effects on IOFs both alone and in-combination with other schemes as not significant.
- 4.6.98 In conclusion the Proposed Development would not have a significant effect on any bird species, either alone or cumulatively with other developments.

Ecology

- 4.6.99 **Chapter 6** of the EIA Report assesses effects of the Proposed Development on ecological receptors, including protected species and designated sites. There are 15 statutory designated sites within 10 km of the Site designated for their non-avian ecological features, including 12 SSSIs, two SACs, and one National Nature Reserve ('NNR').
- 4.6.100 In relation to designated sites, the Endrick Water SSSI and SAC are both located outwith the Site boundary but are hydrologically connected. At the closest point the SAC / SSSI is located 1.4 km south- west of the Site (straight line distance) and is hydrologically connected to the Site by a distance of 3.5 km. The assessment concludes that there no significant adverse effects are likely for these designated site both during construction and operation due to the embedded and standard mitigation measures that would be employed, including a 50m buffer of infrastructure from watercourses, pollution prevention measures and water quality and biotic monitoring, which would further reduce the risk of downstream pollution incidents affecting the qualifying interests of the Endrick Water SAC / SSSI.
- 4.6.101 The Proposed Development would result in permanent habitat loss due to land take associated with the Proposed Development. All habitats identified as having local or greater value that could be directly or indirectly affected by the Proposed Development were scoped in for detailed assessment. No significant effects are predicted in terms of habitat losses.
- 4.6.102 In terms of protected species, the assessment considered the potential effects of the Proposed Development in relation to a number of protect species, and the majority were scoped out of a detailed assessment as a significant adverse effect was considered unlikely. Embedded and standard mitigation measures are included to ensure significant effects are avoided for protected species.
- 4.6.103 Bats were taken forward for detailed assessment and no significant effects are predicted subject to specific additional mitigation measures in the form of post-construction bat monitoring to determine with certainty whether or not significant effects are likely. Further details would be provided in a Bat Monitoring and Mitigation Strategy ('BMSS') to be produced and agreed with SC post consent
- 4.6.104 No significant cumulative effects are anticipated as a result of the Proposed Development.
- 4.6.105 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

- 4.6.106 **Technical Appendix 3.2 Forestry Management Plan** of the EIA Report addresses forestry. The Proposed 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 Development. The total felling required to accommodate construction of the Proposed Development, including infrastructure and advanced felling, totals 75.8 ha.
- 4.6.107 It is explained in the Technical Appendix that as a result of the construction of the Proposed Development, there would be a net loss of woodland area. The area of stocked woodland in the Forest Study Area ('FSA') would decrease by 34.4 ha. As such, in order to comply with the criteria of the Scottish Government's Control of Woodland Removal Policy, compensation planting would be required. The Applicant is committed to providing appropriate compensatory planting. The extent, location and composition of such planting is to be agreed with Scottish Forestry taking into account any revision to the felling and restocking plans prior to the commencement of construction of the Proposed Development.
- 4.6.108 This topic is further addressed below in relation to NPF4 Policy 6 (Forestry, woodland and trees).

(xi) Decommissioning and (xii) site restoration plans

- 4.6.109 As decommissioning effects are, based on current information and guidance, not expected to exceed those at construction phase (for any technical topic), detailed assessment of decommissioning effects has been scoped out of the EIA.
- 4.6.110 Prior to decommissioning, a Decommissioning and Restoration Plan ('DRP') will be produced to reflect then current legislation and policy and will be agreed with the relevant statutory authorities. It is anticipated that the requirement for this would be secured by condition.
- 4.6.111 Site restoration would be undertaken as soon as possible on completion of construction. Soils would be used for reinstatement works associated with access tracks, cable trenches, wind turbine foundations, crane hardstandings, borrow pits and the temporary construction area. The upper vegetated turfs would be used to dress infrastructure edges, and to reinstate the surface of restoration areas. It is anticipated that most of the soil resources within areas directly affected by construction activities would be able to be stored and reinstated as close as possible to where they were excavated, in accordance with best practice; so that the Site would be restored with minimal movement of material from its original location. It is not anticipated that any excavated material would leave the Site.
- 4.6.112 Further detail on Site restoration would be provided within the CEMP, an outline of which is provided in **Technical Appendix 3.1**.

(xiii) Cumulative Impacts

- 4.6.113 The cumulative impacts have been considered, as far as currently possible, as part of the EIA and the results of assessment are presented within the individual topic chapters of the EIA Report. As noted at paragraph 1.6.4 above a high-level desktop grid route corridor appraisal will be submitted that will include an assessment of the cumulative impacts of the grid connection once the grid route is known. Cumulative impacts have been considered throughout this assessment under the individual topic sections above.

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

- 4.6.114 It is considered that the Proposed 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 Development would be implemented in an environmentally acceptable way.
- 4.6.115 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.
- 4.6.116 In addition, the Proposed Development is considered to be acceptable in relation to all of Policy 11's environmental and technical topic criteria.
- 4.6.117 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.
- 4.6.118 In terms of contribution to targets, the Proposed 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

- 4.6.119 The Proposed Development is considered to be acceptable in relation to all of Policy 11's environmental and technical topic criteria.
- 4.6.120 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.
- 4.6.121 Overall, therefore, the Proposed 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. It confirms that there is no single accepted methodology for calculating and/or measuring biodiversity enhancement and reiterates that research has been commissioned to explore options for developing a biodiversity metric or other tool for use in Scotland.

- 4.7.9 The Scottish Government published ‘**Planning Guidance: Biodiversity**’ (**Biodiversity Guidance**)²³ 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.’”*
- 4.7.10 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 at Section 4.6 key points in the guidance include the following:
- > It is set out that NPF4 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).
- 4.7.11 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.”*
- Application of Policy 3**
- 4.7.12 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 enhancements to the natural habitat, offered as part of the Proposed Development and as set out in the Outline HMP (**Technical Appendix 8.6** of the EIA Report).
- 4.7.13 Enhancement and restoration measures are primarily targeted at addressing losses of priority habitats, focussing on target floral species and those measures that will support a diverse faunal community from invertebrates through to the higher trophic species groups.
- 4.7.14 In summary, the details of the proposed measures relating to biodiversity enhancement will focus predominantly on the following enhancement measures:
- > 1. Creation of areas of native woodland.
 - > 2. Riparian zones
 - > 3. Restoration of peatland
 - > 4. Creation and improvement of ponds
 - > 5. Provision and maintenance of wildlife boxes/nests
 - > 6. Invasive species removal
- 4.7.15 The Outline HMP should be referred to for its detail with regard to the various specific measures that are proposed.
- 4.7.16 Detailed monitoring and management prescriptions will be included in the Final HMP. Outline measures are provided in the Outline HMP. Monitoring results will be reported annually in years when monitoring takes place.
- 4.7.17 The commitments within the Outline HMP have the objective of benefiting biodiversity. The proposals would therefore result in the site, from a biodiversity perspective, being in a

²³ Scottish Government (2025) Planning Guidance: Biodiversity.

“demonstrably better state” than without intervention, in accordance with the provisions of Policy 3.

- 4.7.18 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.

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 NNRs.

- 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 NSA should be addressed. As explained in the LVIA, no national level landscape designations would be affected by the Proposed Development.

- 4.8.4 **Policy 4, Part d)** deals with local landscape designations. 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 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 NSA) 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 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. Given the potential hydrological connectivity between the site and the Endrick Water SAC, a Shadow Habitats Regulations Appraisal (‘sHRA’) Report considering potential effects on the Endrick Water SAC is also provided in support of the application. This sHRA screening concludes that on the basis of objective evidence and in view of best scientific knowledge, that there will not be any Likely Significant Effects (LSE) from the construction, operation, or decommissioning activities from the Proposed Development alone, or in combination with other plans or projects.
- 4.8.11 **Policy 4, Paragraph c)** deals with national landscape designations. As noted above under Policy 11, the site is not subject to any national landscape designations, and no impacts are predicted on the designations identified within the LVIA study area.
- 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, the assessment concludes that a small number of the SLQs of the Southern Hills LLA and the Kilsyth Hills SLA would be significantly affected as a result of the Proposed Development. Whilst it is acknowledged there would be some localised significant effects upon landscape character from a small part of the designations it would not be sufficient to undermine the integrity of the designation overall.
- 4.8.13 **Policy 4 Paragraph f)** relates to protected species, and as noted above no significant effects are predicted on protected species.
- 4.8.14 **Policy 4, Paragraph g)** relates to proposals within Wild Land Areas. As explained previously, no areas of Wild Land would be affected by the Proposed Development.
- 4.8.15 Overall, the Proposed 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 10 Hydrology, Hydrogeology, Geology and Soils** of the EIA Report considers the potential impact on geology and peat including soils.

4.9.5 It is explained in the assessment that the northern extent of the Site is underlain by peaty gleyed podzols whilst the southern, western and eastern extent of the Site is underlain by mineral gleys and brown earth soils.

4.9.6 Site surveys have confirmed that the majority of the Site recorded a peat depth <0.5m (approximately 86.4% of all peat probes recorded) with an average thickness of peat across the Proposed Development of 0.3m. Localised areas of peat >1m deep are recorded near the northern and eastern boundary of the Site. A maximum depth of 2.1m was recorded within the northern extent of the Site. The condition of the peat at the Site has been classified as artificially drained or modified.

4.9.7 Further details of peat depth and conditions surveys are contained within **Technical Appendix 10.1: Peat Landslide Hazard Risk Assessment** ('PLHRA') and **Technical Appendix 10.2: Outline Soils and Peat Management Plan** ('OSPMP') of the EIA Report.

4.9.8 The Proposed Development has generally been limited to areas of peat <0.5m deep, where peat is absent or where it has been degraded / previously modified. Existing tracks have been used where possible to reduce the amount of peat excavations.

4.9.9 It has been demonstrated that the Proposed Development will avoid peat deposits >1 deep and that the disturbance of peat and carbon-rich soils as a result of construction of the Proposed Development can be minimised.

4.9.10 With the implementation of recommended best practice measures to be outlined in the final CEMP, the potential impact on these deposits is assessed as negligible. Consequently, the overall significance of the effect is also negligible and therefore considered not significant.

4.9.11 The Proposed 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 **Technical Appendix 3.2 Forestry Management Plan** of the EIA Report addresses forestry. The Proposed 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 Development. The total felling required to accommodate construction of the Proposed Development, including infrastructure and advanced felling, totals 75.8 ha. The majority of the areas to be felled for the Proposed Development would be restocked except for land required for permanent infrastructure subject to the buffer zones and land to be left unplanted for forest management or forest design purposes.

- 4.10.5 As such, and as explained in the Technical Appendix, there would be a net loss of woodland area as a result of the Proposed Development. The area of stocked woodland in the FSA would decrease by 34.4 ha.

- 4.10.6 As such, in order to comply with the criteria of the Scottish Government's Control of Woodland Removal Policy, compensation planting would be required. The Applicant is committed to providing appropriate compensatory planting. 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 of the Proposed Development.

- 4.10.7 The Proposed 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 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 Development on heritage assets. Embedded and standard mitigation measures are inherent to the Proposed Development. The design process has been iterative responding to site specific cultural heritage constraints, whereby the design has sought to avoid direct impacts on known heritage assets within the site. Additionally during the EIA Scoping stage, it was identified that T1 of the Scoping Layout had the potential to impact on the setting of Sir John de Grahams Castle (SM4278). T1 was moved approximately 0.75km to the north east to reduce visibility from this asset.
- 4.11.3 The assessment considers potential direct and indirect physical impacts related to the Proposed 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 four assets within the Site boundary which could be directly impacted by the Proposed Development; **SLR60, SLR61, SLR106 and SLR107**, all heritage assets of negligible significance. The significance of effect on these assets as a result of direct impacts is anticipated to be negligible, which is not significant in EIA terms. There is the potential for unknown remains of all periods within the site, however, due to the commercial forestry likely removing any archaeological context any unrecorded remains within areas of construction would be of negligible significance resulting in a significance of effect which would be minor and not significant in EIA terms. Where there is potential for direct effects on assets within the site, additional mitigation is proposed in the form of the demarcation of the assets and where avoidance is not possible an archaeological watching brief is recommended with the details to be agreed with SC. The assessment concludes that there would be no significant adverse effects predicted for assets within the Site as a result of the Proposed Development.
- 4.11.4 In agreement with Historic Environment Scotland (‘HES’) and SC, five designated assets were assessed for impacts on their setting as a result of the Proposed Development.
- 4.11.5 Impacts on the setting of Waterhead, two standing stones 800m ENE of (**SM2719**) and Dundaff Hill, mound 550m NE of summit (**SM6553**) were assessed as minor and not significant.
- 4.11.6 Impacts on the setting of three Scheduled Monuments was considered to be significant and the summary position in relation to each is as follows:

- > Sir John de Graham's Castle (SM4278): the assessment explains that a **significant adverse effect** is predicted on the setting of the heritage asset. The assessment concludes that while there is a distraction to the ability to understand, appreciate and experience the asset's setting, as a result of the introduction of the Proposed Development into the landscape, despite this, the ability to understand, appreciate, and experience the **key** aspects of the asset's importance would not be fully removed, with the turbines acting as a distraction, but not removing or obstructing these key aspects of the asset's setting completely. The key aspects of the asset's setting would remain legible. In addition, key outward views from the asset, to the south, south east and south west would not be impacted at all and the assessment concludes that the ability to understand, experience and appreciate the asset's command and control over the valley would be retained. The Proposed Development would result in a Moderate significance of effect which is considered **significant** in EIA terms. However, the assessment explains that it is considered that the ability to understand, appreciate, and experience the asset's setting is adequately retained. Significant adverse impacts on the integrity of the setting of the scheduled monument are avoided, as required by NPF4 Policy 7h.
- > Todholes, cairn 1000m NNE of (SM2492): the assessment explains that a **significant adverse effect** is predicted on the setting of the heritage asset. . The assessment concludes that although there is a clear distraction to the ability to understand, appreciate and experience the asset's setting, as a result of the introduction of the Proposed Development into the landscape, the ability to understand, appreciate and experience the asset's placement within a funerary landscape, its placement along the Endrick Water valley, and its placement in proximity to areas of prehistoric settlement would not be removed and views would not be obstructed by the Proposed Development. These aspects of setting are key to understanding its placement and the positioning of the Proposed Development would preserve their legibility. Furthermore, views southwards over the Carron Valley and towards the Campsie Fells would remain unimpacted, with the turbines remaining outwith any views. As such, the ability to understand, appreciate and experience the asset's intentional placement with views along the valley to the south would remain intact. The Proposed Development results in a moderate significance of effect. This is considered **significant** in EIA terms. The assessment concludes however overall that significant adverse impacts on the integrity of the setting of a scheduled monument are avoided in accordance with NPF4 Policy 7h.
- > Todholes, cairn 1300m NNW of (SM4491): the assessment explains that a **significant adverse effect** is predicted on the setting of the heritage asset. When considering the integrity of the setting of SM4491, there is a clear distraction to the ability to understand, appreciate, and experience the asset's setting as a result of the introduction of the Proposed Development into the landscape. However, with regards to the majority of the aspects of the asset's setting, the wind turbines would be peripheral in views and would not remove the ability to understand, appreciate, or experience the contribution of these aspects of the asset's setting to its cultural significance. In addition, the key views from the asset over the Carron Valley and towards the Campsie Fells are unimpacted by the Proposed Development and would remain unobstructed. As such, it is considered overall that the integrity of the setting of the asset would not be significantly adversely affected, in accordance with NPF4 Policy 7h.

4.11.7 The assessment concludes overall in relation to each of the three Scheduled Monuments considered, that the ability to understand, appreciate, and experience the aspects of the assets' setting that contribute to its significance would be adequately retained and there would not be a significant adverse effect on the integrity of setting of the assets.

4.11.8 When considered cumulatively with the surrounding relevant developments, the cumulative impact of the Proposed Development, all heritage assets considered would remain as assessed, with no additional impacts found.

4.11.9 The Proposed 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 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 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 10 Hydrology, Hydrogeology, Geology and Soils** 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. The flood risk screening undertaken indicates potential for flooding from surface water and small watercourses and flooding due to a dam breach. As noted above, no significant effects are predicted in relation to flooding in respect of the Proposed Development subject to embedded mitigation including the provision of SUDs.
- 4.12.4 The Proposed Development is considered to be in accordance with NPF4 Policy 22.

4.13 Conclusions on NPF4

- 4.13.1 Overall, the Proposed 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 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 Development. The Proposed 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 The Proposed Development will deliver significant biodiversity enhancement including peatland restoration and native woodland planting.
- 4.13.7 Significant adverse effects predicted are limited to landscape and visual matters and in relation to cultural heritage assets.
- 4.13.8 In relation to the landscape and visual effects, these have been explained and are considered to be localised in nature and appropriate design mitigation has been applied from the outset of the Proposed Development such that those effects which remain are considered acceptable.
- 4.13.9 In relation to the three scheduled monuments, significant adverse effects are predicted in relation to the setting of the heritage assets however in the context of the NPF4 Policy 7h) test it is considered that the understanding, appreciation and experience of the scheduled monument would be adequately retained such that significant adverse impacts on the integrity of the setting of each of the assets (SM4278, SM2492, and SM4491) is avoided.
- 4.13.10 Overall, the Proposed 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 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 Stirling LDP (adopted October 2018); and associated relevant SG including:
 - Wind Energy Developments (February 2019);
 - Forestry and Woodland Strategy (May 2019); and
 - Flood Risk Management and the Water Environment (May 2020).

5.1.2 The LDP was prepared and adopted prior to NPF4 coming into force and reflects the provisions of the former NPF3 and SPP, both now superseded. Where conflicts or contradictions exist between the LDP and NPF4, or where the LDP is silent, NPF4 policy provisions must prevail.

5.1.3 Relevant policies from the LDP are referenced below. This Chapter does not present a detailed assessment of the Proposed 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 Policy

5.2.1 **Primary Policy 12: Renewable Energy** states that the Government target is to meet an equivalent of 100% demand for electricity from renewable energy by 2020. It states that the plan area has the potential to contribute to energy generation and storage through most of the renewable and low carbon technologies permitting sensitively located development. It adds that all renewable energy developments which contribute towards these targets will be supported where they comply with policies 12.1 or 12.2 (where appropriate) and with all other relevant LDP policies.

5.2.2 Policy 12.1: Wind Energy Developments relates specifically to proposals for wind energy, and states:

(a) Proposals for wind energy developments will be assessed against:*

(i) The spatial framework on Map 1 shows areas likely to be most appropriate for wind energy development. The spatial framework applies to wind energy developments 15.0 metres (to blade tip) and above. The following principles as set out in SPP will apply:

Group 1: Areas where wind farms will not be acceptable - National Scenic Areas.

Group 2: Areas of significant protection - Includes Natura 2000 sites, Inventory Battlefields and Designed Landscapes, Sites of Special Scientific Interest, National Nature Reserves, Wild Land, Carbon Rich Soils/Peat, and Community Separation for Consideration of Visual Impact (2.0 km maximum subject to local topography). Within such areas there is a need for significant protection. However, wind energy development in these areas may be appropriate in some circumstances. Development proposals will require to demonstrate that any significant effects on the qualities of these areas can be substantially overcome by siting, design or other mitigation.

Group 3: Areas with potential for wind farm development - Beyond groups 1 and 2, wind farms are likely to be acceptable, subject to detailed consideration against identified policy criteria.

(ii) National planning policy and guidance current at the time of determination of applications.

(iii) Current locational and design guidance of Scottish Natural Heritage.

(iv) Stirling Council's SG: Wind Energy Developments.

(v) Relevant landscape capacity and design advice in the updated Stirling Landscape Sensitivity and Capacity Study for Wind Energy Development (January 2015).

(b) Developments will be permitted if they are of a scale, layout and nature such that adverse environmental impacts, including cumulative impacts, are avoided or minimised to the satisfaction of the planning authority.

(c) Proposals will also be assessed against the following criteria:

(i) Contribution to renewable energy generation targets and effect on greenhouse gas emissions.

(ii) Landscape and visual impacts.

(iii) Effects on natural heritage including wild land areas, the quality of the water environment and carbon rich soils.

(iv) Historic environment.

(v) Aviation and telecommunication interests.

(vi) Residential and community amenity.

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

(viii) Public access, including impact on long distance walking and cycling routes and scenic routes identified in NPF.

(ix) Road traffic and adjacent trunk roads.

(x) Hydrology and flood risk.

(xi) Cumulative Impacts, arising from the above considerations.

(xii) The need for planning conditions relating to decommissioning and site restoration.

(xiii) Tourism and recreation interests.

SG: Wind Energy Developments supports this policy by providing detailed advice and guidance on the planning and environmental considerations set out in para. (c) above."

5.2.3 As previously set out, the Stirling LDP and its policies were prepared under the previous NPF3 and SPP and reflect their provisions. Part (a) of the policy requires that proposals for wind energy development are assessed against the Spatial Framework for Wind Energy Development, Figure 16 of the LDP. As such, Policy 12.1 is considered to be incompatible with NPF4 Policy 11 and this aspect of Policy 12 should be given no weight in decision making.

5.2.4 The wording of Part (b) is also incompatible with NPF4 Policy 11. NPF4 Policy 11 states that Development proposals for all forms of renewable, low-carbon and zero emissions technologies will be supported and notes that project design and mitigation will demonstrate how the certain impacts are addressed in contrast with the requirement under policy 12.1 for proposals to demonstrate that adverse environmental impacts, including cumulative impacts, are avoided or minimised to the satisfaction of the planning authority. This part of the policy should be given no weight in decision making.

5.2.5 Part (c) lists a number of criteria which follow those previously set out in SPP, and these are largely consistent with the considerations in Policy 11 (e) of NPF4, with the exception of reference to tourism and recreation interest.

5.2.6 These matters have all been addressed in the previous Chapter against NPF4 Policy 11.

5.3 Other Stirling 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
Primary Policy 1: Placemaking	The policy sets out the Council's place-making objectives and states that development of all scales must: Be designed and sited with reference to their own specifications and requirements and in relation to the character and amenity of the place, urban or rural where they are located; Be of quality, having regard to any relevant design and landscape character guidance; Be located so as to reduce the need to encroach onto greenfield sites and to maximise sustainability benefits. Development should utilise vacant and underused land and buildings within settlements at higher densities where appropriate; Safeguard and enhance built and natural heritage contribute to the implementation of the Council's Open Space Strategy and Green Network objectives and respect the Greenbelts; and Have minimal adverse impact on air quality. Air quality assessments and appropriate mitigation measures will be required for any proposed development which the Council considers may significantly impact upon air quality either on its own or cumulatively.	No conflicts or contradictions with NPF4.
Policy 1.1: Site Planning	The policy states that all development is required to contribute, in a positive manner, to quality of the surrounding built and natural environment. All proposals are expected to meet a number of criteria (where relevant). The relevant criteria would include: The siting, layout of new development should complement with its surroundings. All new development should consider and respect site topography and any surrounding important landmarks (built or natural) views or skylines.	No conflicts or contradictions with NPF4.

Policy	Policy Summary	Comment re NPF4
	The design should be appropriate to both any building to which it relates and the wider surroundings in terms of appearance, position, height, scale, massing and should use appropriate materials, finishes and colours.	
Policy 1.2: Design Process	The policy states that in order to ensure that the aims of place-making and quality site planning are met, that a number of requirements require to be followed including Design Statements and Design and Access Statements required in support of planning applications.	NPF4 Policy 14 deals with design and place making. No conflicts or contradictions with NPF4.
Policy 3.2: Site Drainage	The policy sets out requirements in relation to the provision of drainage infrastructure with reference to foul drainage and surface water drainage.	No conflicts or contradictions with NPF4.
Primary Policy 4: Greenhouse Gas Reduction	The policy states in order to contribute to the aims of greenhouse gas reduction, all development should be in sustainable locations and employs sustainable construction materials and methods.	No conflicts or contradictions with NPF4.
Policy 4.2: Protection of Carbon Rich Soils	The policy states that the role of carbon rich soils and storing carbon will be maintained by: > Avoiding the disturbance and excavation of peat and carbon rich soils. > Protecting peat accumulations and high carbon content soils not already designated for habitat conservation reasons. > Supporting proposals in relation of restoration measures. > The policy adds in relation to renewable energy development, the Council will require developers to follow best practice for minimising carbon emissions and disturbance of peat. The policy adds that where peat and other carbon rich soils are present, applicants should submit a peat management plan to assess the likely effects of development on carbon dioxide emissions.	NPF4 Policy 5 deals with Soils. The policy allows for renewable energy and essential infrastructure to be sited on carbon rich soils subject to site assessments. Conflict with NPF4.

Policy	Policy Summary	Comment re NPF4
Primary Policy 5: Flood Risk Management	The policy states that the Council will take a precautionary approach to flood risk from all sources, and it sets out requirements for development in terms of avoiding locations where there would be a medium to high flood risk or where it would lead to an increase in the probability of flooding elsewhere. The policy also sets out that surface water from new development will be treated by a Sustainable Drainage System (SuDS) before being discharged into the water environment.	NPF4 Policy 22 deals with hydrology and flood risk matters. No conflicts or contradictions with NPF4.
Policy 5.1: Reinstatement Natural Water Courses	The policy states that in the interest of sustainable flood management and the protection and improvement of the water environment, development proposals will be expected to incorporate drainage solutions that avoid channel modification and that they should promote the re-naturalisation of watercourses.	NPF4 Policy 22 deals with hydrology and flood risk matters. No conflicts or contradictions with NPF4.
Primary Policy 7: Historic Environment	The policy states that development would have a negative impact on historic assets will not normally be supported. The policy goes on to reference that relevant development proposals will be assessed in line with statutory requirements and Government policy.	NPF4 Policy 7 deals with cultural heritage matters. No conflicts or contradictions with NPF4.
Policy 7.1: Archaeology and Historic Building Recording (Designated and Undesignated Building/Sites)	The policy states that there will be a presumption against development that would have an adverse effect on a Scheduled Monument or the integrity of its setting except in exceptional circumstances. It adds the same presumption will also apply to other nationally important monuments. The policy states that where there is the possibility that archaeological remains may exist within a development site but their extent and significance is unclear, then the developer should arrange for an evaluation prior to the determination of any planning application in order to establish the importance of the site, its sensitivity to development and the most appropriate means for preserving or recording surviving archaeological features.	NPF4 Policy 7 deals with cultural heritage matters and it states that development that would have a 'significant' adverse impact on the integrity of setting of a Scheduled Monument will not be supported unless there are exceptional circumstances. Conflict with NPF4.
Policy 7. 2: Development within and outwith Conservation Areas	The policy states that development within or affecting a Conservation Area will preserve or enhance its character, appearance and setting.	NPF4 Policy 7 deals with cultural heritage matters. No conflicts or contradictions with NPF4.

Policy	Policy Summary	Comment re NPF4
Policy 7.3: Development affecting Listed Buildings	The policy states that the layout, design, materials, scale and siting and use of any development must preserve the character of a Listed Building and its setting.	NPF4 Policy 7 deals with cultural heritage matters. No conflicts or contradictions with NPF4.
Policy 7.8: Development Affecting Battlefields, Gardens and Designed Landscapes	The policy states that development that would have a significant adverse effect upon the archaeology, landscape features, character and setting of sites listed in the Inventory of Historic Battlefields will not be supported unless it can be demonstrated that the overall integrity and character of the battlefield area will not be compromised. It adds that development affecting sites within Gardens and Designed Landscapes shall protect, preserve and enhance such places and shall not impact adversely upon their character, upon important views to, from and within them.	NPF4 Policy 7 deals with cultural heritage matters. No conflicts or contradictions with NPF4.
Primary Policy 8: Conservation and Enhancement Biodiversity	The policy states that the protection, conservation and enhancement of wildlife, habitats and other natural features and international and national designated sites will be supported in line with statutory requirements. The policy references international and nationally protected sites and sets out the development management provisions in relation to each. The policy adds where proposals may affect protected species, developers must carry out species surveys and produce mitigation plans where required.	NPF4 Policy 3 deals with biodiversity and Policy 4 addresses natural heritage designations. No conflicts or contradictions with NPF4.
Policy 8.1: Biodiversity Duty	The policy states that all development proposals will be assessed for the potential impact upon biodiversity. This may be a specific impact on species or habitats at the proposed site, or cumulative impact if the species or habitats have a restricted distribution. The policy adds that developments likely to lead to a significant loss of biodiversity (relative to the Stirling Biodiversity Action Plan, the Scottish Biodiversity List and Natural Heritage Futures) will only be supported if the planning authority is satisfied that adequate provision can be made on or off site to maintain species populations and/or create or enhance comparable habitat such that overall biodiversity is maintained.	NPF4 Policy 3 deals with biodiversity and Policy 4 addresses natural heritage designations. No conflicts or contradictions with NPF4.
Policy 8.2: Proposals Affecting Local	The policy states that the proposal should not adversely affect sites of value to local	NPF4 Policy 4 addresses natural heritage designations.

Policy	Policy Summary	Comment re NPF4
Nature Conservation Sites (LNCS)	nature conservation. Where proposals have the potential to impact on a site: > The developers should carry out a biodiversity assessment with particular reference to those nature conservation interests for which the site has been identified; and Where significant adverse impacts are likely development will only be supported if there are overriding social or economic reasons why the development should go ahead.	No conflicts or contradictions with NPF4.
Primary Policy 9: Managing Landscape Change	The policy states that the integrity, character and special qualities of key areas of nationally and locally valued landscapes will be protected. Elsewhere, landscape and visual impacts will be important considerations in determining all proposals for development and land use change. The policy states that all development proposals should comply with the following: > Recognise the reasons for any special landscape designation that applies and take account of the guidance as to the types and scales of development that may be acceptable; > Outwith designated landscapes demonstrate that the capacity of the local landscape to accommodate new development of the type and scale envisaged has been taken into account with reference to guidance included within the landscape character assessment; > Avoid adverse cumulative effects on landscape character and visual amenity; and Include appropriate provision for landscape and planting works or maintain and enhance landscape quality and contribute to enhancing the green network.	NPF4 Policy 4 addresses natural heritage designations. No conflicts or contradictions with NPF4.
Policy 9.1: Protecting Special Landscapes	The policy states that decisions on development proposals within designated landscapes will take account of the level of importance and qualities of the area. It states that in all cases the siting and design of development within designated landscapes should be of very high quality. The policy then sets out development management guidance in relation to National Scenic Areas and also Local Landscape Areas (LLAs). For LLAs, it states that proposals will only be supported where it can be demonstrated that:	NPF4 Policy 4 addresses natural heritage designations. No conflicts or contradictions with NPF4.

Policy	Policy Summary	Comment re NPF4
	> The landscape character, scenic interest and qualities for which the area has been designated will not be adversely affected; and There is a specific nationally recognised need for the development at that location which could not be satisfied in a less sensitive area, and any adverse effect clearly outweighed by social, environmental or economic benefits of local importance.	
Policy 9.2: Wild Land Areas	The policy states that the Council will seek to protect the character of Wild Land Areas and any development proposed must be able to demonstrate that any significant effects on the qualities of these areas can be substantially overcome by siting, design or other mitigation.	There is an element of incompatibility between NPF4 Policy 4 and LDP Policy 9.2 whereby Policy 4 (g) relates specifically to development within wild land areas. Policy 9.2 is more broad relating to any development proposed. NPF4 is clear that <i>'Buffer zones around wild land will not be applied, and effects of development outwith wild land areas will not be a significant consideration.'</i> Limited weight is therefore afforded this policy of the LDP. The Proposed Development is not within a WLA and this is dealt with under NPF4 Policy 4 in Chapter 4.
Policy 9.3: Landscaping and Planting in Association with Development	The policy states that development should incorporate new landscape and planting works appropriate to the local context and to the scale and nature of the development. All development proposals should: > Identify and safeguard existing landscape or planting features where these make a valuable contribution to local landscape character, biodiversity, cultural heritage or amenity. > Include high quality proposals for new landscape and planting works. Demonstrate suitable arrangements for the establishment and long term maintenance of new landscape and planting.	No conflicts or contradictions with NPF4.
Primary Policy 10: Forestry, Woodlands and Trees	The policy states that the Council will, through the development management process, promote Tree Preservation Orders, protect existing woodland and seek to expand woodland cover.	NPF4 Policy 6 deals with woodland and trees. No conflicts or contradictions with NPF4.

Policy	Policy Summary	Comment re NPF4
Policy 10.1: Development Impact on Trees and Hedgerows	The policy states that proposals should provide protection from adverse impacts resulting from development to important individual trees, groups of trees or hedgerows that contribute to local amenity or of nature conservation or historic interest. It adds that all proposals on sites with existing trees or other significant vegetation features within or close to the site boundary should: > Include an appropriate tree survey and demonstrate how the findings of it have informed the development proposals; > Identify trees proposed for removal and retention; > Bring forward tree planting proposals to compensate for any removal and/or workable mitigation measures where the development would impair connectivity between important woodland habitats; and Demonstrate suitable arrangements for long term management of retained trees and any compensatory planting.	NPF4 Policy 6 deals with woodland and trees. No conflicts or contradictions with NPF4.
Primary Policy 13: The Water Environment	The proposal states that all development must protect and enhance, by minimising and mitigating any potential impacts, the physical, chemical and biological quality of the water environment.	NPF4 Policy 22 deals with the water environment. No conflicts or contradictions with NPF4.
Primary Policy 14: Soil Conservation and Agricultural Land	The policy states that the Council recognises the benefits of conserving soils. It states that larger scale developments located on areas of better quality productive soils will only be supported where they conform to the spatial strategy of the plan. It adds that all developments should: > Consider means to protect and enhance soils; > Adopt best practise when moving , storing and reinstating soils; > Consider opportunities to reuse soils necessarily excavated from the site; Ensure the sustainable use of soils during the development and operation of sites and a commitment to minimise soil sealing.	NPF4 Policy 7 deals with soils. No conflicts or contradictions with NPF4.

5.3.2

It is considered that the Proposed 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 following SG is relevant to the Proposed Development:

- > Wind Energy Developments (February 2019): proposed under the SPP and follows the approach of identifying the spatial strategy which is inconsistent with NPF4. The document includes a capacity assessment for various scales of development within each of the landscape character areas. This approach is not consistent with NPF4. A more appropriate approach is for an up to date site specific capacity assessment, based on the existing cumulative position, undertaken as part of a detailed landscape and visual impact assessment which has been conducted as part of the EIA for the Proposed Development.
- > Forestry and Woodland Strategy (May 2019): the purpose of the Stirling and Clackmannanshire Forestry and Woodland Strategy ('SCFWS') is to provide a local expression of how the national vision and priorities for the protection and expansion of Scotland's forest and woodland resource as set out in the Scottish Forestry Strategy (SFS) will be achieved. The Proposed Development will result in the loss of commercial forestry plantation, and appropriate compensatory planting is proposed.
- > Flood Risk Management and the Water Environment (May 2020): the SG follows national planning guidance with respect flooding and supports the application of LDP policies. The guidance has been referred to in the EIA. There are no likely significant effects in relation to flooding or water management.

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 Development would be in accordance with relevant policies of LDP.
- 5.4.2 It is considered that the effects arising from the Proposed Development would be acceptable in terms of the criteria identified by Policy 12.1 however, it is noted that parts a and b of the policy are deemed to be inconsistent with NPF4 Policy 11 and therefore conflicts exist and limited weight should be afforded these aspects of Policy 12.1.
- 5.4.3 Conflict has been identified with a number of policies and limited weight should be afforded to these. Of the remaining policies of relevance it is considered that the Proposed Development accords with those policies.
- 5.4.4 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 12.1, 4.2, 7.1 and 9.2) 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’ publication²⁴. 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 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 Planning Balance

- 6.2.1 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.
- 6.2.2 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 planning application. OWPS and the relevant NPF4 policies 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.
- 6.2.3 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*”²⁵. 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

²⁴ CCC, Net Zero, The UK’s contribution to stopping global warming (2019).

²⁵ NPF4, page 2.

- > 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.

- 6.2.4 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”*²⁶.
- 6.2.5 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”**²⁷ (original emphasis) in line with the NPF4.
- 6.2.6 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.
- 6.2.7 While not a National Development in the context of NPF4, the delivery of large scale renewable energy projects is undisputed in terms of national planning and energy policy. As the Statement of Need for Strategic Renewable Electricity Generation and Transmission Infrastructure explains²⁸ *“A large and rapid increase in electricity generation from renewable sources will be essential for Scotland to meet its Net Zero emissions targets.”*
- 6.2.8 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.
- 6.2.9 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 with

²⁶ OWPS 2022, paragraph 1.1.2.

²⁷ Energy Strategy and Just Transition Plan, page 55.

²⁸ NPF4, page 103.

significant adverse effects extending out to approximately 6-7 km from the Proposed Development.

- > 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 Development 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 local landscape designations which have been considered in detail as part of the LVIA.
- > 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 Development. As explained, the siting and design approach has sought to minimise adverse impacts on peatland and carbon rich soils.

- 6.2.10 The Applicant has gone to considerable lengths to ensure a satisfactory layout, design and composition for the Proposed Development. In short, appropriate design mitigation has been applied. Potentially significant adverse landscape and visual effects resulting from the Proposed Development have been addressed through an iterative design process (i.e. 'mitigation by design') and a well-considered proposal has been established, which has acceptable effects. The landscape and visual impacts would be localised and is clear that such impacts are to be considered generally acceptable.
- 6.2.11 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 Development in meeting climate change targets.
- 6.2.12 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.
- 6.2.13 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***".
- 6.2.14 In considering the increased policy support for renewable development at the national level which has been introduced by NPF4, a series of Section 36 decisions²⁹ 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

²⁹ 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).

change, its potential effects and the need to cut carbon dioxide emissions, remain a priority of the Scottish Ministers.

- 6.2.15 The Proposed 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 Development and its identified effects within the planning balance.
- 6.2.16 The effects of the Proposed 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 Development, significant weight must be placed on its nationally important contribution to renewable energy generation and greenhouse gas emissions reduction targets.

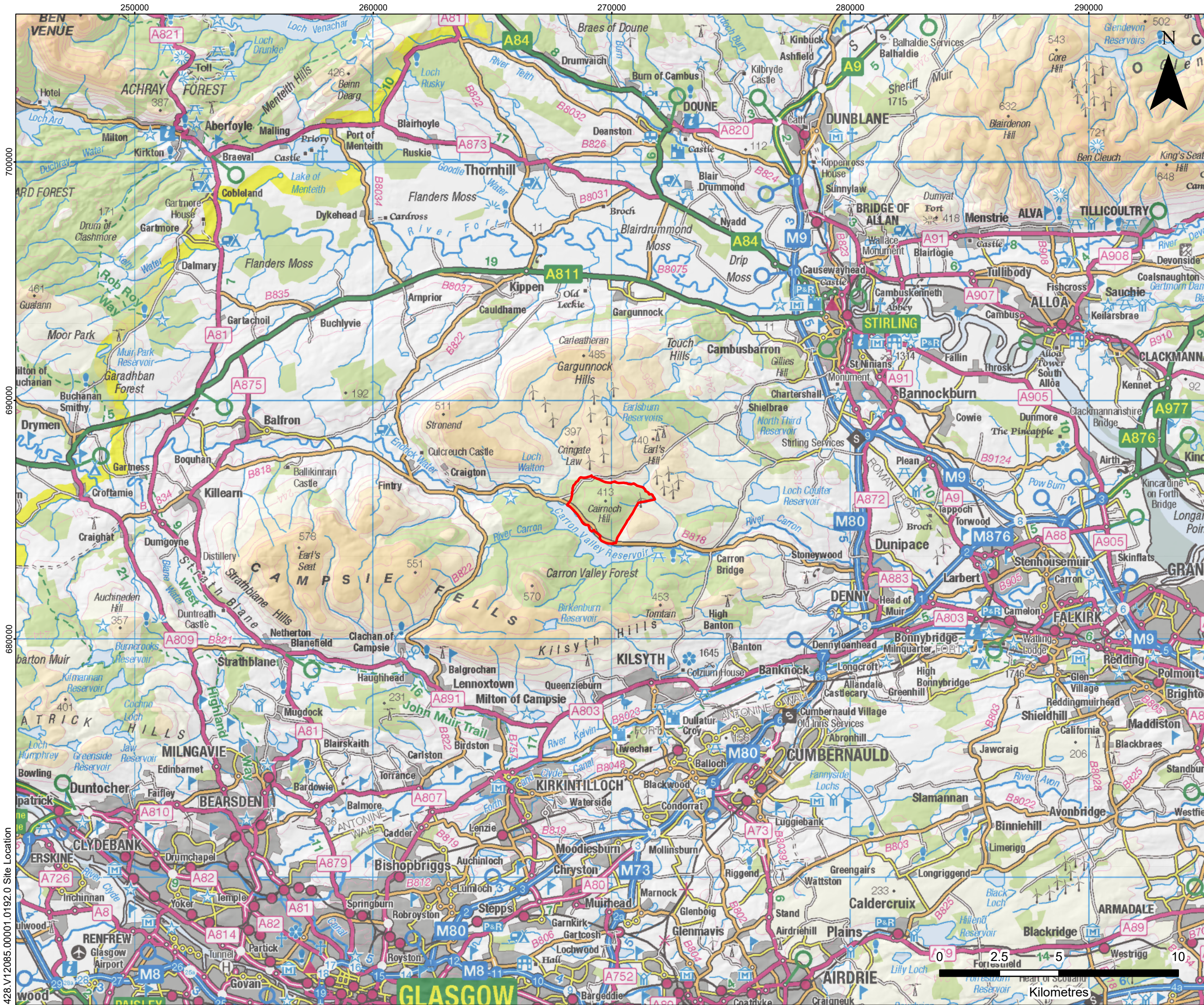
6.3 Overall Conclusion

- 6.3.1 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.
- 6.3.2 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 Development.
- 6.3.3 The conclusion is that the Proposed 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 this planning application.

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LEGEND

 Site Boundary

Eurowind Energy™

SLR

CAIRNOCH HILL WIND FARM

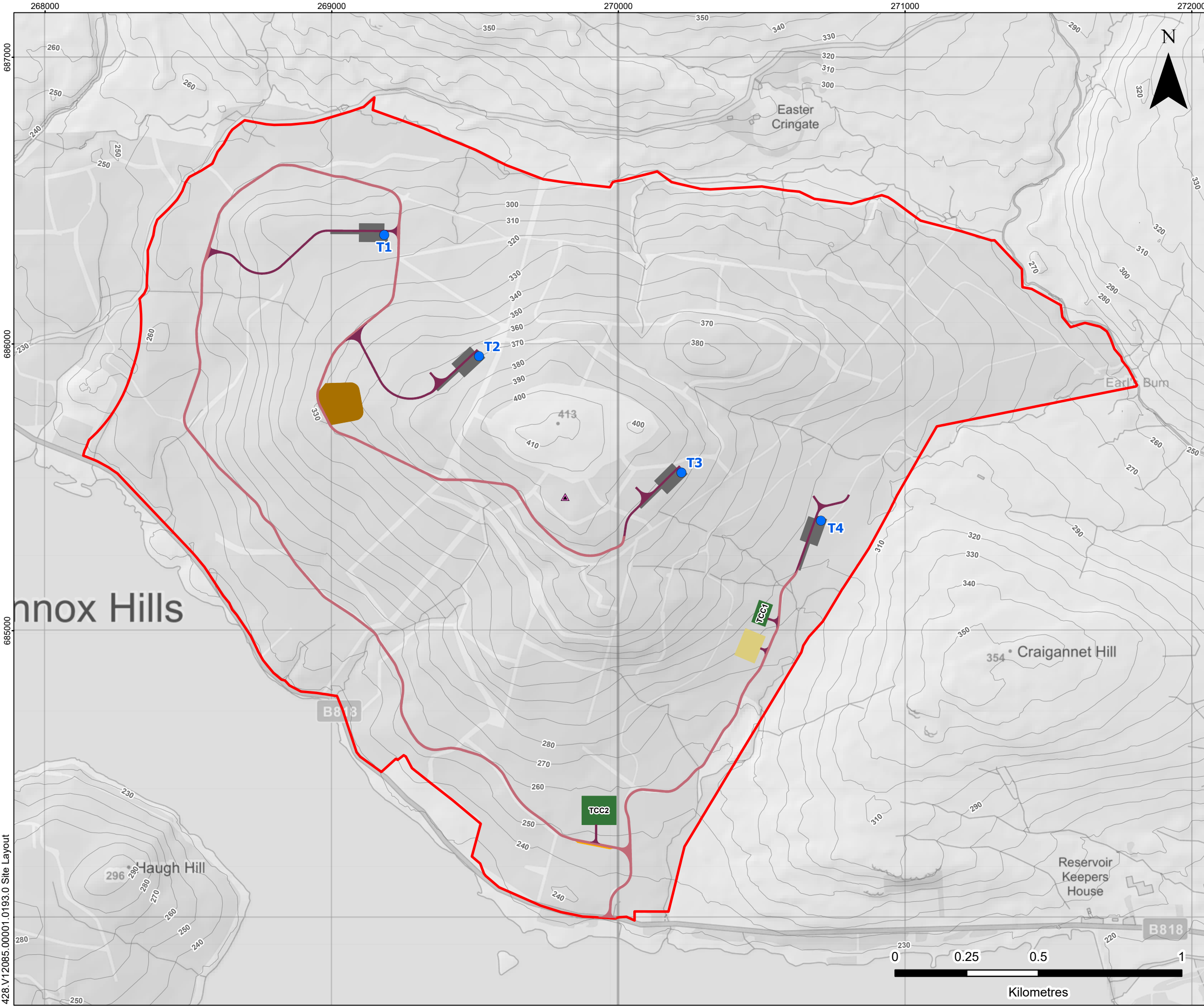
PLANNING STATEMENT

SITE LOCATION

FIGURE 1.1

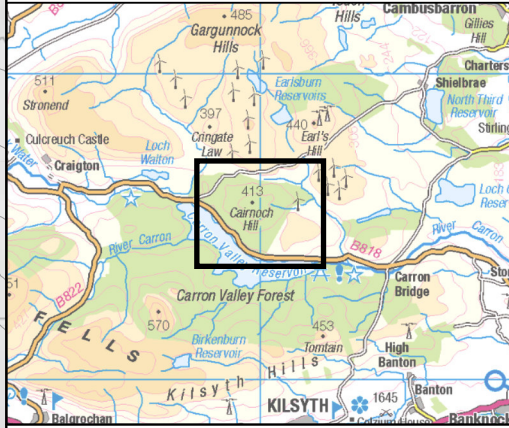
Scale 1:150,000 @ A3

Date JULY 2026



- LEGEND**
- Site Boundary
 - Proposed Turbine Location
 - Proposed Permanent Met Mast Location
 - Proposed New Track
 - Proposed Existing Track to be Upgraded
 - Proposed Crane Pad / Hardstanding
 - Proposed Substation Compound
 - Proposed Temporary Construction Compound
 - Proposed Borrow Pit
 - Proposed Blade Laydown Area

Note: Point features are not drawn to scale in this figure.



Eurowind Energy™



CAIRNOCH HILL WIND FARM
PLANNING STATEMENT
PROPOSED SITE LAYOUT

FIGURE 1.2

Scale	1:12,500 @ A3	Date	JULY 2026
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428.V12085.00001.0193.0 Site Layout