



Planning Statement

West Scales Energy Park

West Scales Windfarm Limited

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Executive Summary

Introduction and Proposed Development

West Scales Windfarm Limited (“the Applicant”) is seeking planning permission under the Town and Country Planning (Scotland) Act 1997 (as amended) (“the Planning Act”) for the installation and operation of an energy park consisting of up to four wind turbines, solar photovoltaic (PV) arrays, a Battery Energy Storage System (BESS), and associated infrastructure (together, “the Proposed Development”) on land at West Scales Farm, approximately 3km west of Gretna in Dumfries and Galloway (“the Site”).

The Principle of and Need for the Proposed Development

There is now very strong support for renewable energy developments in national energy and planning policy, and in legally binding targets to reduce carbon emissions and increase renewable energy generation. It is widely accepted that the deployment of further onshore wind energy developments at scale are essential to achieving a net zero economy, as is reflected in their status as national developments in National Planning Framework 4 (NPF4).

Despite in principle support for the development of onshore wind, Development Plan policies still require detailed consideration of onshore wind energy projects against a range of environmental considerations to ensure that the right development happens in the right place.

Layout and Design of the Proposed Development

The Proposed Development would have a generating capacity between 20MW and 50MW, classifying it as a Major development under Scottish planning regulations. The Site is primarily agricultural, with gently sloping farmland, native woodland, and hedgerows, and includes small field drains but no major rivers. There are no statutory environmental designations within the Site, although it lies approximately 2km north of internationally and nationally designated ecological sites. Peat deposits are present at the southern, western, and northern edges, particularly near Nutberry Moss.

Although the Proposed Development would result in some significant adverse landscape and visual effects, these would not extend beyond 10km and are considered localised. It is considered that appropriate design mitigation has been applied and that the layout and design of the Proposed Development successfully achieves the balance between renewable energy generation (to address climate change and meet renewable energy targets) and the need to protect local landscape character and visual amenity.

Benefits of the Proposed Development

The proposed wind turbines and solar PV would deliver a total generational capacity of approximately 36.8MW of renewable energy, comprising approximately 24.8MW from wind and 12MW from solar, as well as approximately 12MW of battery energy storage, therefore making a positive and valuable contribution towards supporting Scotland’s target of 20GW of onshore wind and 4-6 GW of solar PV by 2030, contributing to a fully decarbonised energy system by 2045. It would reduce greenhouse gas emissions, enhance UK energy security, and lessen reliance on imported and price-volatile fuels.

Overall, the Proposed Development would deliver significant environmental, social, and economic benefits:

- **Contribution to Climate Change and Net Zero Targets:** The development supports UK and Scottish commitments to net zero, helping reduce greenhouse gas emissions in line with the Climate Change Act (UK, 2019) and the Climate Change



(Scotland) Act (2019). It will generate over 43,500 tonnes of CO₂ savings per year compared to fossil fuel electricity over its 40-year lifetime, providing a meaningful contribution to climate change mitigation.

- **Renewable Energy Generation:** With a nominal capacity of approximately 24.8MW of wind turbines, solar PV array capacity of 20MW, and BESS capacity of up to 12MW, the project would produce around 97,300MWh annually, enough to power approximately 29,400 average UK homes. This supports Scottish Government onshore wind targets of 20GW by 2030 and enhances energy security by reducing reliance on imported fossil fuels.
- **Biodiversity Enhancement:** The Proposed Development includes an Outline Habitat and Biodiversity Enhancement Management Plan (OHBEMP) to restore and enhance degraded habitats, including rush pasture, transition mire, blanket bog, and woodland. Measures such as hedgerow creation, wildlife boxes, and bat monitoring will increase biodiversity and resilience to climate change, delivering positive ecological outcomes.
- **Socio-Economic Benefits:** During construction, the £49.6 million investment is expected to generate £3 million GVA locally and support 35 years of employment in Dumfries and Galloway, with broader Scottish benefits of £12.4 million GVA and 134 years of employment. Over its 40-year operational life, the Proposed Development will continue to provide long-term economic value, employment, and contributions to local non-domestic rates.
- **Community Benefits and Ownership:** The project will provide a Community Benefit Fund at £5,000 per installed MW and explore opportunities for part community ownership, offering financial and participatory benefits to local residents.

Collectively, the Proposed Development will help address climate change, support renewable energy targets, enhance local biodiversity, provide sustained socio-economic value, and offer tangible benefits to the local community.

Conclusions

Based on the Environmental Impact Assessment (EIA) Report and analysis in this Planning Statement, it is concluded that the impacts of the Proposed Development on environmental resources and local communities will not be unacceptable and could be adequately controlled through both the mitigation measures proposed or through conditions.

The Proposed Development complies with the principles and policies contained within Development Plan (both NPF4 and the Dumfries and Galloway Local Development Plan 2) and is acceptable in terms of all other material considerations. Taking into account the positive climate change, renewable energy, biodiversity and socio-economic benefits of the project, it is concluded that the planning balance therefore lies firmly in favour of the Proposed Development and planning permission for the project should therefore be granted.



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Acronyms and Abbreviations

BESS	Battery Energy Storage System
CAA	Civil Aviation Authority
CAA	Civil Aviation Authority
CEMP	Construction Environmental Management Plan
CTMP	Construction Traffic Management Plan
DESNZ	Department for Energy Security and Net Zero
DGC	Dumfries and Galloway Council
DGLDP2	Dumfries and Galloway Local Development 2
EIA	Environmental Impact Assessment
EnvCoW	the Environmental Clerk of Works
GAAC	General Aviation Awareness Council
GW	Gigawatt
GVA	Gross Value Added
ha	Hectare
HMP	Habitat Management Plan
LCTs	Landscape Character Types
LDP2	Local Development Plan 2
LVIA	Landscape and Visual Impact Assessment
MW	Megawatt
MWh	Megawatt-Hours
NDC	national determined contributions
NIA	Noise Impact Assessment
NL	National Landscape
NPF4	National Planning Framework 4
NGR	National Grid Reference
NHZ	Natural Heritage Zone
NSA	National Scenic Area
NSRs	noise sensitive receptors
OHBEMP	Outline Habitat and Biodiversity Enhancement Management Plan
OWPS	Onshore Wind Policy Statement
OWPS	Onshore Wind Policy Statement
PPS	Planning Policy Statement
RVAA	Residential Visual Amenity Assessment
RSA	Regional Scenic Area
SAC	Special Area of Conservation
SBL	Scottish Biodiversity List



SEPA	Scottish Environment Protection Agency
SLQs	Special Landscape Qualities
SPA	Special Protection Area
SPEN	Scottish Power Energy Networks
SuDS	Sustainable Drainage Systems
SSSI	Site of Special Scientific Interest
UK	United Kingdom
UK IAIP	UK Integrated Aeronautical Information Package
UN	United Nations
ZTV	Zone of Theoretical Visibility



1.0 Introduction

The Application

- 1.1 West Scales Windfarm Limited (“the Applicant”) is seeking planning permission under the Town and Country Planning (Scotland) Act 1997 (as amended) (“the Planning Act”) for the installation and operation of an energy park consisting of up to four wind turbines, solar photovoltaic (PV) arrays, a Battery Energy Storage System (BESS), and associated infrastructure (together, “the Proposed Development”) on land at West Scales Farm, approximately 3km west of Gretna in Dumfries and Galloway (“the Site”).
- 1.2 The Proposed Development constitutes a Schedule 2 development under the Town and Country Planning (Environmental Impact Assessment) (Scotland) Regulations 2017. The application is therefore accompanied by an Environment Impact Assessment (EIA) Report.
- 1.3 The EIA Report presents the findings of the EIA process by describing the Proposed Development, the current conditions at the Proposed Development Site and the likely environmental effects which may result from the construction and operation of Proposed Development.
- 1.4 Where appropriate, mitigation measures designed to avoid, reduce or offset potentially significant effects are proposed and conclusions are presented on residual effects (those effects that are expected to remain following implementation of mitigation measures).
- 1.5 This Planning Statement does not form part of the EA Report. However, reference is made to the conclusions of the EIA Report in assessing the acceptability of the proposals. This Planning Statement should be read in parallel with the EIA Report.
- 1.6 Section 25 of the Planning Act states:

“Where, in making any determination under the Planning Acts, regard is to be had to the development plan, the determination is, unless material considerations indicate otherwise, to be made in accordance with that plan.”
- 1.7 In this case the Development Plan consists of NPF4 and the Dumfries and Galloway Local Development Plan.

The Applicant

- 1.8 West Scales Windfarm Limited (the Applicant) is a wholly owned Entity of Eurowind Holding UK Limited HQ in Edinburgh. With a Head office in Hobro, the Eurowind Energy Group under Eurowind Energy AS is one of Europe’s leading renewable energy companies.

Purpose of this Planning Statement

- 1.9 The primary purpose of this Planning Statement is to provide an assessment of the Proposed Development against Development Plan policy and other relevant material considerations. **Section 2** provides an overview of the project description. **Section 3** summarises the need for and benefits of the Proposed Development. **Section 4** provides the planning policy assessment. **Section 5** weighs up the planning case for the Proposed Development and provides concluding remarks on the acceptability of the scheme.



2.0 Proposed Development

2.1 This section introduces the Site and provides an overview of the Proposed Development.

Site Location and Description

2.2 The Site is predominantly used for agricultural purposes characterised by gently sloping agricultural land, with elevations gradually increasing from south to north. It includes areas of pastoral and arable farmland, native woodland and hedgerows. The Site contains no major streams or rivers but is intersected by small field drains.

2.3 There are no statutory environmental designations within the Site boundary. However, the Site lies approximately 2km north of several designated ecological sites including the Solway Firth SPA, SAC and Ramsar site, and the Upper Solway Flats and Marshes SSSI.

2.4 The Site is host to some peat deposits in its southern, western and northern edges, particularly adjacent to Nutberry Moss.

2.5 The location of the Site is shown on **Figure 1.1 (Chapter 1: Introduction)** and a detailed description of the Site can be found in **Chapter 2: Site Description and Design Evolution** in the associated **EIA Report (Volume 2)**.

Overview of the Proposed Development

2.6 The Proposed Development includes associated infrastructure including wind turbine crane hardstandings, internal access tracks, underground cabling, a substation compound with a control building and a BESS. The Proposed Development also incorporates up to two temporary construction compounds, and a permanent anemometry mast for wind monitoring.

2.7 The Proposed Development would include:

- up to four turbines;
- wind turbine foundations;
- anemometry mast;
- crane pads and laydown areas adjacent to each wind turbine;
- transformers and related switchgear adjacent to each wind turbine;
- solar PV array;
- access track;
- security fencing;
- CCTV;
- one substation;
- substation compound, including BESS;
- BESS units;
- two temporary construction compounds; and
- underground cabling.

2.8 The layout of the Proposed Development is shown in **Figure 3.1 (Chapter 3: Description of the Development)**. It is proposed that a 50m micro-siting tolerance of wind turbines and a 75m micro-siting tolerance for all other infrastructure 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). This micro-siting allowance is requested in order to allow a degree of flexibility to take into account localised ground conditions and other environmental constraints which may be identified during post consent survey works.

- 2.9 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. It is anticipated that the agreed micro-siting distances may form a planning condition accompanying any consent for the Proposed Development.
- 2.10 The proposed wind turbines would be up to 200m height to blade tip. The exact model of the wind turbines to be installed would be selected at time of procurement and would be dependent upon technology available at that time. Given this uncertainty, this application requests a reasonable degree of flexibility for the permissible dimensions of the wind turbines. However, based upon the proposed maximum blade tip heights, it is anticipated that the installed capacity of the proposed wind turbines would be approximately 24.8MW.
- 2.11 The solar PV arrays, would cover an area of approximately 11.1ha and have a rated output of approximately 12MW. There would also be approximately 14,326 tracking modules reaching 4.5m height at peak tilt and mounted on metal frames, as well as inverters, combiner boxes, and transformer stations. The operation of the solar PV arrays would be managed via a Smart Array Controller and Smart Logger. The system has in-built commissioning functionality and would be operated remotely via the preferred network application.
- 2.12 The BESS included in the Proposed Development is for up to 12MW. For BESS, the MWh rating generally refers to the total amount of energy that the system can store e.g. a BESS rated at 12MWh could deliver 1MW of electricity continuously for 12 hours. It is likely that the storage capacity of the proposed BESS would be in the range of two hours, based on current trends in the UK market. While longer-duration systems are starting to emerge, two hour configurations remain the most common and economically viable for projects of this scale in the UK. The specific MWh rating of the BESS included in the Proposed Development would be determined at detailed design stage, post any consent.
- 2.13 It is anticipated that construction of the Proposed Development would commence in 2028 or 2029 and would last up to 16 months. Thereafter, it is anticipated that the Proposed Development would have an operational life of up to 40 years from the date of first commissioning.
- 2.14 At the end of the operational life, the Proposed Development would be decommissioned. Alternatively, a new consent application may be submitted to extend the project life or re-power the Proposed Development. The final decommissioning approach would be agreed with the Dumfries and Galloway Council in line with best practice guidance and requirements of the time. This would be done through the preparation and agreement of a Decommissioning Restoration and Aftercare Strategy. Financial provision for the decommissioning would be provided for.
- 2.15 A detailed description of the Proposed Development can be found in **Chapter 3: Description of Development** of the EIA Report (Volume 2).



3.0 Need for and Benefits of the Proposed Development

Introduction

- 3.1 The Proposed Development is needed to meet climate change and renewable energy targets, to provide greater energy security and to meet rising electricity demands. Through its construction and operation, the Proposed Development would also generate significant economic and social benefits. This section sets out further detail of the need for and benefits of the Proposed Development.

Climate Change Targets

Legislative and Policy Context

- 3.2 The UN has stated that in order to limit global warming to no more than 1.5°C (as aimed for under the Paris Agreement) that greenhouse gas emissions would need to be reduced by 45% by 2030 and reach net zero by 2050. The UN (UN, 2025) has described the meaning of net zero as follows:

“net zero means cutting carbon emissions to a small amount of residual emissions that can be absorbed and durably stored by nature and other carbon dioxide removal measures, leaving zero in the atmosphere.”

- 3.3 The UK and Scottish Governments have made a number of legally binding commitments in respect of reducing emissions of greenhouse gases in order to contribute towards these international efforts to combat climate change.
- 3.4 The Climate Change Act, as amended in 2019, commits the UK to net zero by 2050. The original act, passed in 2008, committed the UK to an 80% reduction of greenhouse gas emissions by 2050, compared to 1990 levels. In 2019, the Climate Change Act 2008 (2050 Target Amendment) Order 2019 was passed which increased the UK’s commitment to a 100% reduction in emissions by 2050.
- 3.5 In Scotland, the Climate Change (Scotland) Act 2009 as amended by the Climate Change (Emissions Reduction Targets) (Scotland) Act 2019 commits Scotland to achieving net zero emissions of all greenhouse gases by 2045.
- 3.6 In the Climate Change Committees most recent February 2025 progress report (Climate Change Committee 2025) to the UK Parliament, the committee stated that “*While most of the required emissions savings to achieve the First Carbon Budget (2026 to 2030) have credible plans or plans with only some risks, there are significant risks to achieving much of the Second (2031 to 2035) and Third (2036 to 2040) Carbon Budgets*” and that “*Time is tight, with long lead times between policy action and emissions reductions in many cases.*”
- 3.7 Similarly, the Climate Change Committees March 2024 progress report (Climate Change Committee 2024a) to the Scottish Parliament identified that Scotland has missed eight of its past 12 annual targets and looks set to miss its 2030 interim target. It states that the “*Scottish Government is failing to achieve Scotland’s ambitious climate goals*” and that “*current overall policies and plans in Scotland fall far short of what is needed to achieve the legal targets under the Scottish Climate Change Act.*” It believes that the “*acceleration required in emissions reduction to meet the 2030 target is now beyond what is credible...given the pace at which supply chains and investment would need to develop.*”
- 3.8 Despite not currently being on track to meet their 2030 interim targets, both the UK and Scottish Governments have recently reiterated their commitments towards 2045 and 2050 net zero targets.



- 3.9 The Labour Party's 2024 general election manifesto (Labour Party 2024) stated that the "*climate and nature crisis*" was the "*greatest long term global challenge*." One of Labour's 'five missions to rebuild Britain' in the manifesto was to make Britain "*a clean energy super power to cut bills, create jobs and deliver security with cheaper, zero-carbon electricity by 2030, accelerating to net zero*." More recently, the UK Government reiterated its commitment to achieving net zero by 2050 in a statement on North Sea energy repeated in the House of Lords on 12 March 2025 (House of Lords, 2025). Baroness Blake of Leeds, a government whip in the House of Lords, stated "*the Government remained committed to achieving the UK's national determined contributions (NDCs), carbon budget six and net zero by 2050*."
- 3.10 In a statement to the Scottish Parliament in April 2024 (Scottish Parliament, 2024), Net Zero Secretary Màiri McAllan stated "the race to net zero is one that we must all win and I want to begin by affirming this Government's unwavering commitment to ending our contribution to global emissions by 2045 at the latest."
- 3.11 Overall, as evidenced through their continued commitment towards net zero, it is concluded that the seriousness of climate change, its potential effects and the need to cut carbon dioxide emissions remain a priority of both the UK and Scottish Government. However, the likely failure of both countries to meet interim emissions targets for 2030 (and beyond) highlight the urgency of action now needed to meet these net zero targets.
- 3.12 **Chapter 4: Renewable Energy and Planning Policy** in the **EIA Report (Volume 2)**, provides a summary of specific relevant legislation, planning policy and guidance for each technical discipline considered in the EIA Report.

Contribution of the Proposed Development Towards Emission Reductions and Climate Change Targets

- 3.13 A carbon balance assessment has been undertaken for the Proposed Development using the latest version of the Scottish Government's carbon calculator for wind farms. The methodology used for the carbon calculator includes a range of factors that account for carbon losses including:
- wind turbine lifecycle (e.g. manufacture, construction and decommissioning);
 - backup power generation when the wind turbines cannot generate energy;
 - reducing carbon fixing potential from peat loss;
 - soil organic matter from peat losses;
 - dissolved organic carbon and particulate organic carbon leaching from changes in drainage in peat; and
 - forestry felling.
- 3.14 The methodology also includes the following range of factors that account for carbon savings including:
- carbon emission savings due to generation (based on displacing emissions from different power sources);
 - lifetime costs associated with manufacture of turbines and construction;
 - loss of carbon from backup power generation;
 - loss of carbon-fixing potential of peatland;
 - loss and/or saving of carbon stored in peatland (by peat removal or changes in drainage); and
 - carbon gains due to proposed habitat improvements; and



- removal of drainage from foundations and hardstanding.
- 3.15 The results from the carbon calculator reveal that the Proposed Development is expected to result in carbon savings of over 17,994 tCO₂ which means a total of over 700,000 tonnes over a fossil fuel mix of electricity generation over its proposed 40-year operational life.
- 3.16 As discussed in Chapter 5 of this Planning Statement, it is considered that the positive contribution of the Proposed Development towards meeting emission reduction targets and addressing climate change through renewable energy generation should be afforded significant weight in the determination of this application.

Energy Policy and Targets

Policy Context

- 3.17 Both the UK and Scottish Government energy policy is strongly driven to ensuring that an increased proportion of electricity is generated from renewable energy sources.
- 3.18 In December 2022, the Scottish Government published the updated 'Onshore Wind Policy Statement' (OWPS) (Scottish Government, 2022). The OWPS sets a target for a minimum installed capacity of 20 GW of onshore wind in Scotland by 2030, noting that the "*continued deployment of onshore wind will be key to ensuring our 2030 [carbon emissions] targets are met*".
- 3.19 The OWPS also highlights predicted increased future demand for electricity, referencing the National Grid's Future Energy Scenarios which conclude that Scotland's peak demand for electricity will at least double within the next two decades. The OWPS therefore states that meeting this increased demand "*will require a substantial increase in installed capacity across all renewable technologies.*"
- 3.20 The OWPS also notes, in light of the current international and economic situation, of the need for greater security of supply and low cost generation. It states that "*Russia's illegal invasion of Ukraine and the resulting extraordinary rise in the price of fossil fuels, in particular gas, demonstrates that continuing to rely on commodities that are subject to global price shocks is no longer an option.*" In this regard it identifies that onshore wind is a cheap and reliable source of zero carbon electricity.
- 3.21 With regard to greater energy security, the OWPS also identifies the need to add greater network resilience. It states that: "*We believe that onshore wind can play a greater role in helping to address the substantial challenges of maintaining security of supply and network resilience in a decarbonised electricity system. This will mean an increasing ability to provide some of the services and responses that are currently provided by thermal generation.*"
- 3.22 The importance of increased generation of electricity from renewable energy sources in enhancing the UK's energy independence and resilience is also recognised in the UK Government's 'British Energy Security Strategy' published in April 2022. It states that "*the growing proportion of our electricity coming from renewables reduces our exposure to volatile fossil fuel targets*" and that "*accelerating the transition from fossil fuels depends critically on how quickly we can roll out new renewables*".
- 3.23 More recently, the UK Government's Department for Energy Security and Net Zero (DESNZ) published its Clean Power 2030 Action Plan in December 2024 (UK Government, 2024). It states that Britain needs to install "*clean sources of power at a pace never previously achieved*" and sets a target to increase onshore wind capacity to 27-29 GW and 45-47GW for solar capacity by 2030. It defines clean power as generation from renewables and nuclear plus future low carbon technologies such as gas with carbon capture and storage. It states that clean power is needed by 2030 to "*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, and the need to reduce greenhouse gas emissions and limit our contribution to the damaging effects of climate change.”

- 3.24 With regards to domestic energy production, the Clean Power 2030 Action Plan identifies the need to maintain higher levels of resilience and security – including to severe weather events which are expected to increase in intensity and frequency as a result of climate change and in managing threats to national security. It recognises onshore wind, along with solar, as the lowest cost way of generating electricity and providing a clean and secure source of electricity supply.
- 3.25 The Clean Power 2030 Action Plan highlights that decarbonisation means that the UK is likely to become more dependent on some forms of energy compared to others. It identifies that using electrification to reduce emissions in large parts of transport, heating and industry could lead to more than half of final energy demand being met by electricity in 2050, up from 17% in 2019 and representing a near doubling in demand for electricity.
- 3.26 At the time of writing this Planning Statement, operational onshore wind farm in the UK totals approximately 15.8GW and in Scotland totals approximately 10.4GW (Renewable UK, 2025). With 2030 only five years away, an additional 11.2 to 13.2GW of onshore wind is therefore needed to meet the UK Government’s clean power targets and an additional 9.6GW needed to meet the Scottish Government onshore wind energy targets. Although there are a number of proposed projects which may help to take the UK and Scottish Government closer to these 2030 targets, many of these projects may not be consented or may not be built. In addition, some operational wind farms contributing towards the current installed capacity will have reached the end of their operational life by 2030 and may not be repowered. Consequently, the need for a rapidly increased scale and pace of onshore renewables deployment to meet the UK and Scottish Government’s 2030 renewables targets is clear. It has also been confirmed that these targets should not be regarded as a cap and consequently the attainment or likely attainment of these targets should not be regarded as a ceiling restricting the ability of further onshore wind energy projects from coming forward and being consented.

Contribution of the Proposed Development Towards Energy Targets

- 3.27 The Proposed Development would produce an average capacity of approximately 97,300 MWh of electricity annually (based on a site derived capacity factor of 40% for wind generation and 10% for solar generation).
- 3.28 Based upon this predicted annual electricity generation and the most recent energy statistics from DESNZ which identify that average UK domestic household consumption is approximately 3,301kWh per annum, the Proposed Development would therefore supply the power consumed by approximately 29,200 average UK households per year¹.
- 3.29 As discussed in Chapter 5 of this Planning Statement, it is considered that the contribution of the Proposed Development towards renewable energy targets should be afforded significant weight in the determination of this application.

Biodiversity Enhancement

Policy and Legislative Context

- 3.30 Experts have warned that a decline in biodiversity will make the climate crisis worse while a changing climate will increase the rate of biodiversity loss. New legislative proposals to help

¹ Calculated using the most recent statistics from Department of Energy Security and Net Zero (DESNZ) showing that annual GB average domestic household consumption is 3,323kWh (as of December 2025).



restore nature and protect biodiversity in Scotland were introduced to the Scottish Parliament in February 2025.

- 3.31 The Nature Environment (Scotland) Bill was passed by the Scottish Parliament on 29 January 2026 and became an Act on 12 March 2026. The legislation introduces statutory targets for nature recovery for the first time in Scotland, aiming to make the country 'nature positive' by 2030 and actively restore nature by 2045. These targets are intended to improve biodiversity, restore degraded ecosystems and enhance natural capital across Scotland.
- 3.32 In introducing this Bill, Cabinet Secretary for Rural Affairs Mairi Gougeon said:
- “We all depend on nature – to provide our food, help prevent flooding, tackle the climate crisis and contribute to our wellbeing. But right now around 11% of species in Scotland are under threat and if we do not take urgent action, nature in Scotland will continue to decline and some important species might be lost forever. Our proposals in this Bill can contribute to the Scottish Government’s priority of tackling the climate emergency. The twin crises of climate change and nature loss are interdependent and need to be tackled together.”
- 3.33 The targets in the Act align with the Scottish Biodiversity Strategy (Scottish Government, 2024) and its Delivery Plan, which aims to halt biodiversity loss by 2030 and restore nature by 2045. Securing positive effects for biodiversity is one of six statutory outcomes for our National Planning Framework introduced by the Planning (Scotland) Act 2019.

Contribution of the Proposed Development Towards Biodiversity Enhancement and Addressing the Nature Crisis

- 3.34 An Outline Habitat Management Plan (OHMP) has been developed in consultation with the landowners of the Site. The OHMP is intended as a precursor to a more detailed HMP, which would be produced and agreed with the Planning Authority, in consultation with NatureScot and Scottish Environment Protection Agency (SEPA) post consent, prior to the commencement of construction.
- 3.35 Long-term improvements will be delivered through the OHMP which includes creating new wet meadow areas, planting native woodland, adding new hedgerows and providing features such as wildlife boxes and reptile shelters. Ongoing monitoring of water levels and vegetation will help ensure these habitats develop well and support a more diverse range of species over time.
- 3.36 The OHMP identifies the key aims of the HMP would be as follows:
- To maintain, restore and enhance rush pasture and transition mire.
 - To create and enhance the quality and connectivity of native woodland with the HMP Area.
 - To create hedgerow planting.
 - To maintain and provide wildlife boxes/nests.
 - To carry out bat monitoring activities.
 - To provide an overall increase in biodiversity and increased resilience to adverse effects of climate change within the HMP Area.
- 3.37 All of the proposed HMP Area lies within land under the Applicant’s control and can therefore be secured in relation to the HMP through a planning condition.
- 3.38 Through the implementation of the HMP, it is predicted that the Proposed Development would result in a beneficial effect on biodiversity in the longer term which would make a positive contribution towards the nature crisis.



- 3.39 The OHMP, which proposes habitat restoration and enhancement measures, and how these would be maintained, is provided as Technical Appendix 8.4 of the EIA Report. Should the Proposed Development be granted consent it is anticipated that the document would be further developed, in discussion with Dumfries and Galloway Council, SEPA and NatureScot.

Socio-Economic Benefits

Policy Context

- 3.40 As well as encouraging the development of renewable energy as a response to Scotland's own climate change and renewable energy commitments, the Scottish Government is also keen to encourage their development as a measure to promote the Scottish economy. The Scottish Government's Draft Energy Strategy and Just Transition Plan (Scottish Government, 2023) highlights the importance of renewables in creating good, green jobs, especially in rural and former industrial areas.

Socio-Economic Benefits of the Proposed Development

- 3.41 The potential economic benefits that the Proposed Development will deliver are reported in full in the **Economic Impact Report** included as Appendix B to this Planning Statement.
- 3.42 During the development and construction phase, the Proposed Development, representing an investment of approximately £49.6 million, is expected to generate £3 million in Gross Value Added (GVA) and support 35 years of employment in Dumfries and Galloway, as well as £12.4 million GVA and 134 years of employment across Scotland. Opportunities for local suppliers are anticipated through balance of plant contracts, including plant hire, civil engineering, construction, fencing and other skilled trades.
- 3.43 Over its 40-year operational life, the Proposed Development is projected to continue generating annual economic value and employment in Dumfries and Galloway and across Scotland, alongside a significant long-term contribution in non-domestic rates. This sustained activity is expected to strengthen the human, economic, social and natural capital of the area, enhancing community resilience and supporting long-term economic development. Commitments include working with regional economic bodies to support local supply chain participation, encouraging apprenticeships and skills development, promoting fair and inclusive policies, and engaging with schools to encourage collaboration.
- 3.44 It is also estimated the Proposed Development could provide community benefit funding of £5,000 per installed MW of generating capacity, as well as tailored community benefit packages aligned with local priorities, and exploration of community ownership opportunities. Environmental commitments include delivering habitat enhancement where appropriate and achieving a net positive impact on biodiversity. Overall, the approach is described as place-based, collaborative, transparent, flexible and designed to maximise and deliver lasting benefits for local communities.
- 3.45 Overall, it is therefore considered that the Proposed Development would deliver positive economic impacts that will support the objectives of the Scottish Government's Draft Energy Strategy and Just Transition Plan in their commitments to climate change and renewable energy.



4.0 Planning Assessment

Introduction

- 4.1 The primacy of the Development Plan in determining planning applications is established by Sections 25 and 37 of the Planning Act. These provisions require decision makers to determine planning applications in accordance with the Development Plan unless material considerations indicate otherwise.
- 4.2 Section 24 of the Planning Act, as amended by Section 13 of the Planning (Scotland) Act 2019 (the 2019 Act), provides that the meaning of the statutory 'development plan' consists of the provisions of:
- “(a) the National Planning Framework,
 - (b) any strategic development plan for the time being applicable to the area, together with— (i) the Scottish Ministers' notice of approval of that plan, and (ii) any supplementary guidance issued in connection with that plan, and
 - (c) any local development plan for the time being applicable to the area.”
- 4.3 Following the approval of NPF4, Strategic Development Plans and associated supplementary guidance cease to have effect and as such are no longer considered to be part of the development plan. The Chief Planner's letter of 8th February 2023 states supplementary guidance associated with LDPs which was in force before 12th February 2023 (the date on which section 13 of the 2019 Act came into force) will continue to be in force and be part of the development plan.
- 4.4 The Development Plan in this instance comprises:
- Dumfries and Galloway Local Development Plan 2 (LDP2) (2019); and
 - National Planning Framework 4 (NPF4) (2023).
- 4.5 This section of the Planning Statement assesses the Proposed Development against the relevant provisions of the Development Plan and other relevant material considerations. The assessment is presented on a topic-by-topic basis, with each section beginning with an overview of the relevant Development Plan policies followed by an assessment against these policies. The publication of NPF4 coincided with the implementation of certain parts of the 2019 Act. A key provision is that in the event of any incompatibility between the provision of the National Planning Framework and a provision of the Local Development Plan, whichever of them is the later in date is to prevail. As NPF4 is the more recent plan, it will take primacy where there is any incompatibility with LDP2.
- 4.6 The currently comprised of Dumfries and Galloway LDP2, adopted on 3 October 2019, and remains the primary local policy document for decision-making, setting out the spatial strategy and detailed development management policies relevant to renewable energy proposals, although NPF4 now takes precedence in the event of any policy conflict and introduces strengthened national support for renewable energy development.
- 4.7 The Council is progressing preparation of Local Development Plan 3 (LDP3), which will replace LDP2. An Evidence Report was approved in December 2024 and submitted for Gate Check; however, it was returned by the Scottish Government in April 2025 for further work. The Council is currently updating the evidence base, with the latest programme indicating that a Proposed Plan is expected to be prepared during 2026, followed by public consultation. Adoption of LDP3 is anticipated later in the plan period (circa 2027–2028). At this stage, LDP3 is at an early stage of preparation and therefore carries no material weight in decision-making, although it does indicate the future direction of planning policy, which is expected to further support renewable energy development in line with national objectives.



The Principle of Development

- 4.8 NPF4 identifies 18 national developments that are needed to help deliver the Scottish Government’s spatial strategy. These are defined as “*significant developments of national importance that will help to deliver our spatial strategy*”.
- 4.9 NPF4 identifies that “national development status does not grant planning permission for the development” but does clarify that “their designation means that the principle of the development does not need to be agreed in later consenting processes.”
- 4.10 Annex B of NPF4 provides further details and Statements of Need for each of the eighteen national development. National Development 3 is for Strategic Renewable Electricity Generation and Transmission Infrastructure, for which NPF4 states that:
- “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.”
- 4.11 National Development 3 is identified as being applicable to the whole of Scotland, including the South of Scotland within which the Proposed Development is located.
- 4.12 The Statement of Need for National Development 3 states that:
- “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.”
- 4.13 Although Appendix B of NPF4 clarifies that only onshore wind farms with a capacity exceeding 50MW would qualify as being classified as of national development status under National Development 3, it is considered that the inclusion of renewable energy projects as national developments, together with the more specific policies detailed below, establishes a clear need case for the development of renewable energy projects at any scale.

Climate and Nature Crisis

- 4.14 NPF4 requires that all development proposals be assessed against **NPF4 Policy 1: Tackling the Climate and Nature Crises**.
- 4.15 The intent of NPF4 Policy 1 is to encourage, promote and facilitate development that addresses the global climate emergency and nature crisis, and the policy outcome is identified as zero carbon, nature positive places. The policy states that “*when considering all development proposals significant weight will be given to the global climate and nature crises*.”
- 4.16 The Chief Planner’s Letter of 8th February 2023 makes reference 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.” (own emphasis added).
- 4.17 It is clear from the Chief Planner Letter that there is an expectation that a decision-maker must apply significant weight, but that the extent of this (both positively and negatively in



terms of the proposal's contribution to tackling the climate and nature crisis) is for the determination of the decision-maker.

- 4.18 Renewable energy is one of the best tools available to tackle the global climate emergency and given the nature of the Proposed Development and its potential contribution towards Scottish Government net zero targets, significant weight should be placed on this benefit in the overall assessment of whether the Proposed Development accords with the Development Plan.
- 4.19 The primary benefit of the Proposed Development is to contribute towards the drive towards achieving net zero by 2045 in accordance with the objectives contained in the Climate Change (Scotland) Act 2009 (as amended). With the greatest threat to biodiversity being climate change itself, it is important not to also forget that protecting biodiversity and the climate crisis have a symbiotic relationship. The Reporter in the Sanquhar II Inquiry (at paragraph 2.48 of the Inquiry Report) highlighted that the nature crisis is also required to be given significant weight and neither it nor the climate crisis are given greater priority over the other. The Proposed Development would also deliver significant biodiversity enhancement in accordance with **NPF Policy 3: Biodiversity** which would make a positive contribution toward the nature crisis.

Renewable Energy

- 4.20 All renewable energy proposals are primarily assessed through **NPF4 Policy 11: Energy** and **LDP2 Policy IN1: Renewable Energy**. Specific considerations in respect of onshore wind renewable energy proposals are contained in **LDP2 Policy IN2: Wind Energy**. It is considered that the list of development management relevant to onshore wind in LDP2 Policies IN1 and IN2 are broadly the same as those within NPF4 Policy 11(e). Given this alignment, the primary assessment in this Planning Statement is undertaken against NPF4 Policy 11.
- 4.21 The intent of **NPF4 Policy 11** is to encourage, promote and facilitate all forms of renewable energy development, and the policy outcome is identified as the expansion of renewable, low-carbon and zero emissions technologies. Through the delivery of an installed capacity of up to 36.8MW, comprising approximately 24.8MW from wind and 12MW from solar, as well as approximately 12MW of battery energy storage, the Proposed Development would make a positive and valuable contribution towards this policy intent.
- 4.22 **NPF4 Policy 11 part (a)** provides unambiguous support for all forms of renewable energy development proposals, with subsection (i) confirming that this includes onshore wind farms. Policy 11 part (a) makes clear that onshore wind energy receives overriding policy support in principle.
- 4.23 **NPF4 Policy 11 part (b)** provides that the only areas where renewable energy development proposal are not supported is in National Parks and National Scenic Areas. Policy 11 part (b) is not applicable to the Proposed Development as it lies outwith a National Park and National Scenic Areas.
- 4.24 **NPF4 Policy 11 part (c)** identifies that renewable energy proposals will only be supported where they maximise net economic impact, including local and community socio-economic benefits. The socio-economic benefits of the Proposed Development are summarised in Section 3 of this Planning Statement with a detailed report provided as Appendix B to this Planning Statement. Whilst there is no current guidance on what maximising socio-economic benefits should look like, it is considered that the benefits the Proposed Development would provide in this regard are consistent with Policy 11 part (c).
- 4.25 **NPF4 Policy 11 part (d)** relates to impacts on international and national designations and provides that impacts on these designations be assessed in relation to NPF4 Policy 4. Assessment of the Proposed Development in relation to NPF4 Policy 4 and nature



conservation designations is provided in **Section 4.108 – 4.118** and in relation to landscape designation is **Section 4.31 – 4.56** of this Planning Statement. For the reasons set out in these sections, it is considered that the Proposed Development accords with NPF4 Policy 11 part (d).

- 4.26 **NPF4 Policy 11 part (e)** sets out the factors to be taken into consideration through design and mitigation. It is a requirement that the Applicant consider each of the factors listed at 11 (e) in the development of the proposal. It provides that when considering impacts upon these considerations that “*significant weight will be placed on the contribution of the proposal to renewable energy generation targets and on greenhouse gas emissions reduction targets.*”
- 4.27 The impacts of the Proposed Development on each of the factors listed in NPF4 Policy 11 part (e) are considered in **Sections 4** of this Planning Statement. For the reasons set out, it is considered that the Proposed Development is acceptable in relation to all of the relevant technical and environmental factors listed and that any residual adverse impacts are outweighed by the contribution the Proposed Development would make towards renewable energy generation targets and greenhouse gas emissions reduction targets.
- 4.28 Policy IN1 of the Dumfries and Galloway Local Development Plan 2 (DGLDP2) supports renewable energy developments, including wind, solar and BESS, where they are appropriately sited and designed to minimise environmental and technical impacts. The policy identifies a range of factors to be considered, including landscape, ecology, residential amenity, and infrastructure, to ensure that developments are acceptable. It is considered that the Proposed Development has been appropriately sited and designed to minimise the environmental effects of the Proposed Development to a level that is acceptable.
- 4.29 Policy IN2 of the DGLDP2 specifically addresses wind energy proposals. It supports wind energy developments where they are appropriately located, sited and designed to minimise environmental and technical impacts, and where any adverse effects can be satisfactorily addressed. The policy identifies a range of considerations to be assessed, including renewable energy and socio-economic benefits, landscape and visual impacts, cumulative effects, impacts on local communities and residential interests, and other environmental and infrastructure factors. It is considered that the Proposed Development has been designed and assessed against these criteria, and that the technical and environmental factors outlined in Policy IN2 have been addressed throughout the relevant assessment chapters of the EIA Report and this Planning Statement.
- 4.30 The technical and environmental factors outlined in Policy IN1 and IN2 are addressed throughout Sections 4 of this Planning Statement. On this basis, the Proposed Development is considered to comply with Policy IN1 and IN2 of the Dumfries and Galloway LDP2.

Landscape, Visual and Residential Visual Amenity

- 4.31 The key policy considerations for the Proposed Development in relation to landscape and visual impacts are NPF Policy 11: Energy, NPF Policy 4: Natural Places, and of the DGLDP2, relevant policies include Policy OP1: Development Considerations, Policy OP 2: Design Quality and Placemaking, Policy IN1: Renewable Energy, Policy NE2: Regional Scenic Areas, and Policy HE6: Designed Landscapes.
- 4.32 NPF4 Policy 11 Energy part (e) (i) and (ii) requires design and mitigation to address significant landscape and visual impacts, including residential amenity, while recognising the benefits of renewable energy. DGLDP2 Policies OP1, OP2, IN1 and IN2 require development to be appropriately sited and designed to minimise environmental impacts, including cumulative effects, and to respect landscape character, scenic qualities, and designated and non-designated landscapes. Policies NE1 National Scenic Areas, NE2 Regional Scenic Areas and HE6 Designed Landscapes seek to protect National and Regional Scenic Areas and designed landscapes, including their character, integrity, and key



views. The Proposed Development is designed to comply with these policies, ensuring landscape and visual impacts are appropriately managed.

Siting and Design

- 4.33 Before considering the landscape and visual impacts of the Proposed Development in this Planning Statement, it is important to consider the significant siting and design effort that has been undertaken by the applicant to minimise any significant adverse landscape and visual impacts as a result of the Proposed Development.
- 4.34 A summary of the primary design mitigation undertaken for the Proposed Development is provided below, with full details of this embedded mitigation provided in **Chapter 2: Site Description and Design Evolution** of the **EIA Report (Volume 2)** and in the **Design and Access Statement** which accompanies the application.
- 4.35 The key design objectives for the Proposed Development have been to design a relatively small, compact wind farm that does not markedly impact the character of Criffel or the surrounding coastal flatlands, including the Nith Estuary, which forms the principal part of its landscape setting. The design also aims to avoid significantly affecting the perceived naturalistic character of upland areas within the Nith Estuary National Scenic Area (NSA) and the traditional farmed, settled, and designed landscapes around the Nith Estuary. Additionally, the Proposed Development is intended to avoid significant adverse effects on the contribution of key landmarks, such as the summits of Criffel and Ward Law, the ruins of Caerlaverock Castle and Sweetheart Abbey, and the policy woodlands around the big houses, to the overall character of the NSA.
- 4.36 Key design mitigation employed has included:
- Reducing potential landscape, visual, and residential visual amenity effects by reducing the number of turbines and increasing the separation distances of the turbines from residential dwellings.
 - Designing a relatively small, compact wind farm that does not markedly impact upon the scenic and perceptual qualities of nearby NSA and Natural Landscapes (NL).
 - Implementing mitigation measures such as the removal of tower lighting and the reduction of aviation lighting located on hubs from four to two lights.
- 4.37 The financial involvement for the nearest residential properties has been considered, and it has been assessed that the level of effects would be markedly higher in these instances, with visual effects potentially approaching the amenity threshold. Further consideration has therefore been given to the siting and design of the proposals, including layout refinement and mitigation measures, to reduce potential visual effects where practicable.
- 4.38 To minimise potential night-time lighting impacts, an Aviation Lighting Scheme has been submitted. The lighting assessment was approved by the Civil Aviation Authority (CAA) on 16 February 2026 and subsequently accepted by the Ministry of Defence as addressing their low-flying concerns. Further details are provided in **Chapter 14.1** of the **EIA Report (Volume 2)**.
- 4.39 Overall, it is considered that appropriate design mitigation has been achieved to reduce the landscape and visual effects of the Proposed Development to an acceptable level.
- 4.40 A landscape and visual impact assessment (LVIA) of the Proposed Development is provided in **Chapter 6: Landscape and Visual** of the **EIA Report (Volume 2)**. The key conclusions of this LVIA are discussed below.



Operational Effects on Landscape Character

4.41 The LVIA considers a 45km study area but focuses on landscape character types (LCTs) within a 20 km radius of the Proposed Development and covered by the Zone of Theoretical Visibility (ZTV). The LVIA presents a review of LCTs within the detailed study area and has found that the following LCTs have the potential to undergo significant effects and therefore require a detailed assessment in the LVIA:

- 14. Coastal/ Flow Plateau - Annandale Flow Plateau - Major and significant landscape effect within 3km
- 4. Narrow Valleys - Kirtle Water - Major-moderate and significant effect on closest areas; moderate to moderate-minor and not significant further afield.
- 1. Bay and Estuary - Cardurnock Flatts and Moricambe Bay - Major-moderate and significant effect on southern parts near Torduff Point, Browhouses, and Redkirk Point; moderate and significant further south between Bowness-on-Solway and Burgh Marsh.
- 1. Bay and Estuary - Rockcliffe Marsh; Moderate and significant across most of the unit; moderate-minor to minor and not significant on northern and eastern protrusions
- 2. Coastal Margins – Bowness-on-Solway/ Burgh by Sands/ Newton Arlosh - Moderate and significant along the coastline between Bowness-on-Solway and Easton and around Mossband Hall; moderate-minor to no change elsewhere, not significant.
- 1. Bay and Estuary – Burgh Marsh- Moderate and significant effect across the unit.

4.42 The LVIA concludes that such significant landscape effects would be confined some localised significant effects on aspects of the landscape and visual resource at distances to a maximum radius of approximately 8-9km from the Proposed Development.

Operational Effects on Designated Landscapes

4.43 The assessment of effects on landscape designations is based on the effect that the Proposed Development may have on their 'special qualities' (or 'Special Landscape Qualities') (SLQs). The scoping process and LVIA preliminary assessment has identified the Nith Estuary NSA (~16km), Solway Coast National Landscape (~3km), and Solway Coast Regional Scenic Area (~11km) as the only landscape planning designations which have potential to be significantly affected as a result of the Proposed Development:

- Nith Estuary NSA - the Proposed Development lies a considerable distance outwith the NSA and would have no direct effects on its physical attributes, so that all effects would be perceived. This ensures that SLQs that are dependent upon physical attributes of NSA– of which there are a number - would not be affected by the Proposed Development. Indirect effects associated with the Proposed Development would be limited due to the compact form of the wind farm affecting a very narrow horizontal field of view (~1°) and the Proposed Development's distinctly separate landscape context within the wider coastal flatlands, due to the separation between the Site and the boundary of the NSA (>16km). These effects would also occur within the existing visual context of operational wind farm development that can be seen from the same parts of the NSA as the Proposed Development.
- Solway Coast NL - The LVIA indicates that the Proposed Development would have very limited effects on the Solway Coast National Landscape (NL). Of the 12 SLQs, only two of SLQ4, relating to unbroken vistas across the estuary to Scotland, and SLQ12, relating to rich archaeological and historical heritage have potential to experience significant effects, while all other SLQs would be not significant. The



Proposed Development lies outside the NL and would have no direct physical effects, with visibility largely restricted by the flat topography and screening from hedgerows and trees. Furthermore, the Solway Firth acts as a natural buffer, maintaining the integrity of the NL, and the Proposed Development would be seen in a setting already influenced by existing wind farms, avoiding the introduction of new external influences. Overall, the objectives and overall integrity of the NL are not considered to be compromised.

- Solway Coast RSA – The LVIA indicates the Solway Coast RSA has a medium-high value. This value is attributed to its local level designation in Dumfries and Galloway and its medium to high level of scenic quality. The effects of the Proposed Development on the Solway Coast RSA would be at worst moderate-minor and not significant, and there would be no change across extensive areas that do not fall within the Proposed Development's ZTV. As a consequence, the Proposed Development would also not have significant adverse effects upon the integrity of the RSA. The cumulative effect of the Proposed Development in the application cumulative scenario would be at worst moderate-minor and not significant across affected parts of the RSA, and there would be no change or a negligible effect to the cumulative scenario across parts of the RSA where no or negligible visibility is predicted. The Proposed Development is located outwith the RSA and there would therefore be no direct effects upon its character. Effects of the Proposed Development would therefore be indirect and associated with its influence on its surrounding landscape.

4.44 The LVIA concludes that the significant effects identified for these national and regional landscape designations are not widespread and that their overall integrity would remain intact. No significant effects are predicted for any other landscape designations.

Operational Visual Effects

4.45 The LVIA includes 17 representative viewpoints with supporting photomontage visualisations provided for each viewpoint. Significant visual effects are predicted at eight viewpoint locations as follows:

- Viewpoint 1: B721 near Rigg - Moderate to major effect on road users; significant due to high visual change and medium-low to high-medium sensitivity.
- Viewpoint 2: Eastriggs – from edge of settlement - Major and significant effect on residents due to high visual change and high sensitivity.
- Viewpoint 3: Kirkpatrick Fleming – from B7076 - Major and significant effect on residents due to high-medium visual change and high sensitivity.
- Viewpoint 4: Creca – from road south of settlement - Major-moderate and significant on residents and moderate-minor and not significant effect on road users due to medium visual change and variable sensitivity.
- Viewpoint 5: Coastal Path (junction of Battlehill and Dornock Burn core paths) - Moderate and significant effect on recreational walkers due to medium-low visual change and high-medium sensitivity.
- Viewpoint 7: Start of Hadrian's Wall Path, Bowness-on-Solway – Moderate and significant on residents and walkers; significant due to medium-low visual change, large turbine scale, distance, and simple intervening landscape.
- Viewpoint 10: Boustead Hill - Moderate and significant effect on walkers, cyclists, residents, and road users due to medium-low visual change and high-medium to high sensitivity.



- Viewpoint 11: King Edward I Monument - Moderate and significant effect on recreational walkers; due to medium-low visual change and high sensitivity.

4.46 The LVIA concludes that such significant visual effects would be confined to a maximum radius of approximately 8-9km from the proposed turbines.

Residential Visual Amenity Effects

4.47 The Residential Visual Amenity Assessment (RVAA) is detailed in Technical Appendix 7.2 of the EIA Report (Volume 2).

4.48 The RVAA indicates that significant visual effects would be experienced from a relatively large number of residential properties surrounding the Proposed Development, with the wind turbines and met mast being the primary contributing factors to these effects. While the effects upon the properties visual amenity are considered to be high due to the large to very large perceived scale of the turbines that would be experienced at relatively short distances, it is considered that at the majority of the properties they would not reach the RVA Threshold, primarily due to the small number of turbines proposed, the compact design of the wind farm, the relatively flat and expansive landscape context, and the reduced light intensity predicted from the aviation lights. From four residential properties – namely Redwood House, West Scales Bungalow, Hillhead Cottage and Nutberry Farm – the RVAA predicts that the level of effects would be markedly higher with visual effects potentially reaching the amenity threshold in each instance. All of these properties are financially involved in the Proposed Development.

4.49 From a small number of properties, including Redwood House and West Scales Bungalow, which are financially involved in the Proposed Development, and Hillhead Cottage (#1), and Nutberry Farm, it has been assessed that the level of effects would be markedly higher with visual effects potentially reaching the amenity threshold in each instance. Further details can be found in Technical Appendix 7.2: RVAA of the EIA Report (Volume 2).

Cumulative Effects

4.50 The LVIA identifies that, in addition to the effects of the Proposed Development in isolation, there are likely to be some significant cumulative effects when considered alongside operational, under-construction, consented, and application-stage wind farm developments. for the following receptors:

- Viewpoint 2 – Eastriggs (edge of settlement): Significant cumulative effects on residents' views.
- Viewpoint 7 – Start of Hadrian's Wall Path, Bowness-on-Solway: Significant cumulative effects on views experienced by residents and recreational walkers.
- Settlements of Eastriggs, Bowness-on-Solway, Port Carlisle, and Boustead Hill: Significant cumulative effects on residents' views within these areas.

4.51 The LVIA concludes that such significant cumulative effects would be confined to a maximum radius of approximately 8-9km from the proposed turbines.

Landscape and Visual Conclusions

4.52 Based upon the conclusions of the LVIA, it is clear that the significant landscape and visual effects of the Proposed Development would be localised in extent. As acknowledged in paragraph 3.6.1 of the OWPS (Scottish Government, 2022), meeting Scotland's renewable energy targets will require taller turbines and this will change the landscape. As previously identified, the expectation that significant effects on local landscape will occur is also now written into national planning policy through NPF4 Policy 11(e)(ii). Such localised landscape



and visual effects as predicted for the Proposed Development should therefore be considered acceptable.

- 4.53 It is also considered that appropriate design mitigation has been applied and that the layout and design of the Proposed Development successfully achieve the balance between renewable energy generation (to address climate change and meet renewable energy targets) and the need to protect local landscape character and visual amenity.
- 4.54 For the reasons set out above, it is therefore concluded that the Proposed Development would be in accordance with NPF4 Policy 11 part (e) (ii) and DGLDP2 Policy OP1: Development Considerations, Policy OP 2: Design Quality and Placemaking, Policy IN1: Renewable Energy, Policy NE1: National Scenic Areas, Policy NE2: Regional Scenic Areas, and Policy HE6: Designed Landscapes.
- 4.55 While the Proposed Development would give rise to significant visual effects on views from certain viewpoints—such as residents at Eastriggs (VP2), recreational walkers and residents at the Start of Hadrian’s Wall Path, Bowness-on-Solway (VP7), and residents within parts of Eastriggs, Bowness-on-Solway, Port Carlisle, and Boustead Hill—these effects would be within acceptable limits. Although there would be significant landscape effects on the closest edges of designated areas, such as the Upper Don Valley and Bennachie SLA, their overall integrity would not be compromised. Similarly, cumulative effects arising from the presence of operational, under-construction, consented, and application-stage wind farm developments would not materially alter this conclusion. The Proposed Development would therefore comply with NPF4 Policy 4 part (d) and DGLDP2 Policy OP1, Policy OP 2, Policy IN1, Policy NE2, Policy HE6, Policy ED11 in relation to landscape and visual considerations.

Noise

- 4.56 The key policy considerations for the Proposed Development in relation to noise impacts are NPF4 Policy 11: Energy; NPF4 Policy 23: Health and Safety; DGLDP2 Policy OP1: Development Considerations, Policy IN1: Renewable Energy and Policy IN2: Wind Energy.
- 4.57 NPF4 Policy 11 part (e) (i) requires project design and mitigation to demonstrate how noise impacts on communities and residential dwellings are addressed. NPF4 Policy 23 seeks to prevent development that is likely to result in unacceptable noise issues.
- 4.58 The DGLDP2 requires that noise from renewable developments, including wind farms, does not result in unacceptable impacts. Policy OP1 seeks to avoid significant adverse effects on local amenity, while Policy IN1 and Policy IN2, which specifically relates to renewable energy and wind energy, respectively, similarly requires that potential noise impacts are considered and controlled, including cumulative noise effects with other similar energy developments, to safeguard residential amenity and sensitive receptors.
- 4.59 A full assessment of the potential noise impacts because of the construction and operation of the Proposed Development are set out in **Chapter 13: Noise** of the **EIA Report (Volume 2)**.

Construction Noise Effects

- 4.60 The primary activities creating noise during the construction period are the construction of the turbine foundations; the erection of the turbines; the working of the borrow pits; and the construction of the site compound, access tracks and substation. In addition to these on site activities, there may also be noise from construction traffic travelling to and from the site.
- 4.61 The Noise Impact Assessment (NIA) concludes that construction noise levels will remain within the relevant noise limits in British Standard BS 5228:2009 and will therefore not be significant. Notwithstanding, it is proposed that a planning condition could be applied to the Proposed Development requiring the submission and approval by the Planning Authority of a



Construction Noise Management Plan as part of the final Construction Environment Management Plan (CEMP) to provide suitable noise controls.

Operational Noise Effects

- 4.62 Operational wind turbines emit noise from the rotating blades as they pass through the air. This noise can sometimes be described as having a regular 'swish'. The amount of noise emitted tends to vary depending on the wind speed. When there is little wind the turbine rotors will turn slowly and produce lower noise levels than during high winds when the turbine reaches its maximum output and maximum rotational speed. Background noise levels at nearby noise sensitive receptors (NSRs) will also change with wind speed, increasing in level as wind speeds rise due to wind in trees and around buildings.
- 4.63 The predicted operational noise levels meet the consented noise limits by a minimum margin of 4.2dB. Noise impacts associated with operation of the Proposed Development have therefore been assessed as not significant.
- 4.64 Noise from non-wind turbine operational plant would comprise noise from the substation, transformers within the solar array and battery storage elements only. The sound power levels of the proposed plant are not yet available, however, noise from the installed plant will be attenuated by acoustic enclosure (if required), such that it meets the derived non-wind turbine noise limits.
- 4.65 The Applicant has committed to installed plant meeting these criteria. The impact magnitude would therefore be low and the significance of effect would therefore be minor. As such, noise from fixed (non-wind turbine) plant is predicted to be not significant in EIA terms.
- 4.66 Noise limits have been derived for construction activities and non-wind turbine fixed plant associated with operation of the Proposed Development. Items of fixed plant, including the BESS, will be specified during procurement such that they meet the derived noise limits at all representative NSRs. Noise effects from fixed plant are therefore assessed as not significant in EIA terms.
- 4.67 Predicted wind turbine noise levels associated with operation of the Proposed Development meet derived day and night-time noise limits at all the identified representative NSRs, for all wind speeds. Noise effects due to the operation of wind turbines are therefore assessed as not significant in EIA terms.
- 4.68 Overall, it is therefore concluded that conditions can be imposed to ensure that the Proposed Development does not result in any unacceptable noise effects on residential amenity or create a significant noise nuisance.. The Proposed Development would therefore comply with the requirements of NPF4 Policy 11 part (e) (i) and LDP2 Policies IN1 and IN2 in this regard.

Shadow Flicker

- 4.69 A full assessment of the potential shadow flicker impacts as a result of the operation of the Proposed Development are set out in **Chapter 15: Other Considerations** of the **EIA Report (Volume 2)**.

Operational Shadow Flicker Effects

- 4.70 In the absence of specific guidance for shadow flicker analysis in Scotland, best guidance detailed in The Best Practice Guidance to Northern Ireland Planning Policy Statement (PPS) 18: Renewable Energy (Department of the Environment Northern Ireland, 2009) is considered to be a valid reference for determining the significance of shadow flicker effects. It provides that shadow flicker effects should be limited to no more than 30 hours per year, and 30 minutes per day.



- 4.71 Under a conservative worst-case scenario, the Proposed Development has the potential to give rise to significant shadow flicker effects at up to 13 properties within the 1,670m study area, reducing to four properties under a more likely-case scenario. Should shadow flicker arise in practice, mitigation measures can be implemented, including the temporary shutdown of specific turbines during periods when shadow flicker is predicted to occur.
- 4.72 A planning condition is proposed requiring investigation and mitigation should shadow flicker effects experienced be found to be causing any potential harm or nuisance to residents.
- 4.73 Overall, it is therefore concluded that conditions can be imposed to ensure that the Proposed Development does not result in any unacceptable shadow flicker effects on residential amenity. The Proposed Development therefore complies with NPF4 Policy 11 part (e) (i) and DGLDP2 Policies IN1 and IN2 in this regard.

Public Access

- 4.74 An assessment of the potential impacts on access as a result of the construction and operation of the Proposed Development are set out in **Chapter 12: Traffic and Transport of the EIA Report (Volume 2)**.
- 4.75 There are no footways, core paths or cycle routes along either the B6357 or C43A, and the A75's cycle route crosses via an underpass rather than on-carriageway. There are no core paths within 5km of the site.
- 4.76 General access rights to the site under the Land Reform (Scotland) Act will require to be temporarily suspended on land while construction work is being carried out. This suspension will only apply to areas where construction operations are active rather than the whole of the Site and will be kept to the minimum area and the minimum duration that is reasonable.
- 4.77 It is considered that the Proposed Development will have no impacts to core paths or public access and would therefore comply with the requirements of NPF4 Policy 11 part (e) (iii) and DGLDP2 Policies IN1 and IN2 in this regard.

Aviation and Defence

- 4.78 A full assessment of the potential impacts on aviation and defence related interests as a result of the Proposed Development are set out in **Chapter 14: Aviation** of the EIA Report (Volume 2).

Operational Aviation and Defence Effects

- 4.79 NPF4 Policy 11: Energy part (e) (iv) and DGLDP2 Policy IN2 Wind Energy both require consideration of aviation and defence interests in relation to wind energy developments.
- 4.80 The Proposed Development has been assessed in relation to civil and military aviation requirements. Appropriate notification procedures will be followed prior to construction, including consultation with the Defence Geographical Centre (DGC), General Aviation Awareness Council (GAAC), and the Civil Aviation Authority (CAA), with details incorporated into the UK Integrated Aeronautical Information Package (UK IAIP) as the main resource for information for all of the UK airspace, as well as the Military Aeronautical Information Publications. Crane operations during construction will also be notified prior to the commencement of any construction and before any crane erection begins, detailing position, height, and required lighting etc in accordance with CAP 1096. With these measures in place, construction effects are considered negligible and acceptable to the CAA.
- 4.81 The Proposed Development is located within an MoD low flying Tactical Training Area and, therefore, was subject to an expression of 'concern' by the MoD, in order to ensure that Infra-Red lighting is applied. An Aviation Lighting Impact Assessment has been undertaken and has been approved by the CAA. With this mitigation in place, operational effects are



considered negligible and acceptable to both the CAA and the MoD. No radar or cumulative aviation effects have been identified.

- 4.82 Draft planning conditions are proposed requiring the submission and approval of an Aviation Impact Mitigation Scheme and an Aviation Lighting Scheme prior to the installation of any wind turbines. Subject to the application of these conditions, the Proposed Development would comply with the requirements of NPF4 Policy 11 part (e) (iii) and LDP Policies IN1 and IN2 in this regard.

Telecommunications and Broadcasting Installations

- 4.83 A full assessment of the potential impacts on telecommunication and broadcasting installations as a result of the Proposed Development are set out in **Chapter 15: Other Considerations** of the **EIA Report (Volume 2)**.
- 4.84 After consultation within communications providers and consideration of their requirements in the design process, the assessment concludes the Proposed Development will have no effect on any telecommunications or broadcasting installation. The Proposed Development therefore complies with NPF4 Policy 11 part (e) (v) and DGLDP2 Polic IN1 and IN2.

Traffic and Transport

- 4.85 NPF4 Policy 11: Energy part (e) (iv) and DGLDP2 Policy OP1: Development Considerations, Policy IN1: Renewable Energy, Policy IN2: Wind Energy, and Policy T2: Location of Development/ Accessibility, require consideration of on road traffic and adjacent trunk roads in relation to renewable energy and wind energy developments.

Construction Traffic Effects

- 4.86 As described in **Chapter 3: Description of Development, Site access**, during construction, for the Proposed Development, would be taken from a new access constructed on the A75 along the southern frontage of the Site and immediately east of an existing field access. The new access would be a 'left-in, left-out' arrangement meaning that vehicles could not turn right into it (other than AILVs under escort) or turn right from it. Further details can be found in **Chapter 12: Traffic and Transport** of the **EIA Report (Volume 2)**.
- 4.87 During construction, the Proposed Development will generate additional HGV, staff vehicle, and occasional abnormal load movements, following defined routes via the A75, B6357, and C43A, with a left-in, left-out Site access to manage turning movements safely. Traffic increases during the busiest months are predicted to be modest, typically 2–6% above projected future flows, below thresholds likely to cause discernible effects. Abnormal load convoys will be infrequent, escorted, and pre-advertised, with only short-term, controlled disruption. No significant impacts on driver delay, road safety, pedestrian amenity, or severance are anticipated.
- 4.88 During operation, traffic will be limited to occasional maintenance visits, and decommissioning is expected to involve fewer vehicle movements than construction, with no abnormal loads. A Construction Traffic Management Plan (CTMP) will ensure safe and efficient construction movements, including agreed routes, delivery timing, speed management, wheel washing, signage, and liaison with authorities. Cumulative traffic effects from other developments are not expected to be significant, and overall, no significant residual traffic or transport effects are predicted during any phase of the development.
- 4.89 A CTMP is proposed which would be developed in agreement with the Planning Authority and Transport Scotland detailing the exact mitigation measures to be implemented during construction of the Proposed Development. The requirement for a CTMP for the Proposed Development could be secured through an appropriately worded planning condition.



- 4.90 Overall, taking into account the proposed mitigation and planning conditions, the traffic and transport assessment concludes that, with mitigation measures applied, no significant effects are expected on transport during the construction, operation and decommissioning of the Proposed Development both individually and in combination with other proposed developments. The Proposed Development therefore complies with NPF4 Policy 11 part (e) (vi) and DGLDP2 Policy OP1, IN1, IN2 and T2 in this regard.

Historic Environment

- 4.91 The key policy considerations for the Proposed Development in relation to the historic environment are NPF4 Policy 11: Energy; NPF Policy 7: Historic Assets and Places, and local policies of DGLDP2 including Policy OP1: Development Considerations; Policy OP2: Design and Placemaking Development; Policy HE1: Listed Buildings; Policy HE3: Archaeology; Policy IN1: Renewable Energy and Policy IN2: Wind Energy.
- 4.92 DGLDP2 Policies OP1 and OP2 require that development protects and enhances the character, appearance, and setting of the historic environment and delivers high-quality design that complements the existing built and natural environment. Policies HE1: Listed Buildings, HE3: Archaeology and HE5: Hadrian's Wall seek to protect listed buildings, archaeological sites and monuments, and the Outstanding Universal Value and setting of Hadrian's Wall World Heritage Site, ensuring that development avoids harm or provides suitable mitigation where impacts may occur. Policies IN1 and IN2 support renewable energy developments provided impacts on the historic environment, including archaeology and wider landscape settings, are avoided or appropriately mitigated. The Proposed Development is designed to comply with these policies, ensuring that impacts on the historic and cultural heritage of the Site and its surroundings are avoided or mitigated.
- 4.93 A full assessment of the potential impacts of the Proposed Development on the historic environment are set out in **Chapter 9: Archaeology and Cultural Heritage** of the EIA Report (Volume 2).

Direct Physical Impacts

- 4.94 During construction, potential effects primarily relate to ground disturbance from turbine foundations, access tracks, crane pads, cabling, solar array piling, and compound establishment. These works could remove or truncate previously unknown archaeological remains, particularly within peat areas where paleoenvironmental and prehistoric potential is moderate. The only known asset within the Site, West Scales Farmstead (SLR5), would be avoided, with infrastructure placed at sufficient distance to prevent direct harm.
- 4.95 Embedded measures, including micrositing, on-site demarcation, and a watching brief during all ground-breaking works within peat, minimise risk to unknown remains. Decommissioning effects would be similar but of smaller scale, with temporary disturbance unlikely to alter the long-term archaeological potential. Overall, direct physical impacts are negligible for known assets, with potential effects on unknown remains restricted to areas of peat.

Setting Impacts

- 4.96 Operational effects arise from visibility of turbines altering the setting of nearby heritage assets. Most assets experience no appreciable change or only minor distraction due to distance, partial screening, or peripheral turbine placement. However, three assets of Stapleton Tower (LB3782) and the Calvertsholm Cottages cairns (SM11947 and SM11950), experience medium adverse change because turbines appear in important outward views, producing moderate, significant effects in EIA terms. For these three assets, the historic links and interest of the asset within its surrounding land would remain retained and unaffected by the Proposed Development. As such, the character, architectural and historic interest of the



asset, and the integrity of its setting, would be preserved in accordance with NPF4 Policy 7(c) and 7(h).

- 4.97 All other assets, including Mossknowe House, Bonshaw Tower, Woodhouse Tower, Robgill Mains cairn, Blackyett cairn, The Bracken settlement, Calvertsholm settlement, and the Hadrian's Wall World Heritage Site, experience minor or very minor, non-significant effects. Operational effects require no additional mitigation as changes are accounted for in the design, and cumulative effects with other developments are not predicted to elevate impacts beyond those of the Proposed Development alone.
- 4.98 It is concluded that appropriate design mitigation has been applied to minimise the impact of the proposals on the historic environment and the historic links and interest of the asset within its surrounding land would remain retained and unaffected by the Proposed Development. As such, the character, architectural and historic interest of the asset, and the integrity of its setting, would be preserved in accordance with NPF4 Policy 11 part (e) (vii) in this regard, as well as NPF4 Policy 7 and DGLDP2 Policies OP1, OP2, HE1, HE3, HE5, IN1, and IN2 in this regard.

Hydrology, the Water Environment and Flood Risk

- 4.99 A full assessment of the potential impacts of the Proposed Development on hydrology, the water environment and flood risk are set out in **Chapter 10: Geology, Hydrology, Hydrogeology and Peat** of the **EIA Report (Volume 2)**.
- 4.100 The Proposed Development has been considered against relevant national and local planning policies relating to hydrology, the water environment, and flood risk. This includes NPF4 Policy 11 Energy (e)(viii) which requires project design and mitigation to demonstrate how impacts on hydrology, the water environment, and flood risk are addressed, while NPF4 Policy 20 Blue and Green Infrastructure aims to protect and enhance blue infrastructure. DGLDP2 Policies OP1(f), IN2 Wind Energy, IN7 Flooding and Development and IN8 Surface Water Drainage and Sustainable Drainage Systems (SuDS) require development to maintain or enhance water quality, manage water quantity including flooding, avoid or mitigate significant impacts on watercourses and drainage, avoid development in flood risk areas, and incorporate appropriate surface water drainage measures, including SuDS. The Proposed Development is designed to comply with these policies, ensuring that impacts on the water environment, hydrology, and flood risk are adequately avoided or mitigated.

Water Environment

- 4.101 The Site drains south toward the River Esk estuary, mainly within the Kirtle Water catchment, with small drains and one tributary present. Surface water quality is recorded as Poor for the Kirtle Water and Moderate for the Solway Estuary. During construction, potential effects include sedimentation, erosion, temporary changes to flow paths, and minor dewatering.
- 4.102 Embedded measures such as 50m watercourse buffers, controlled stockpiling, Sustainable Drainage Systems (SuDS), spill response protocols, and a detailed CEMP reduce risks to negligible. Operational effects are smaller, with routine maintenance of SuDS, tracks, and watercourse crossings ensuring drainage patterns remain unchanged. Overall, all effects on surface water during construction and operation are negligible and not significant.

Flood Risk

- 4.103 The gently sloping Site exhibits negligible flood risk, with runoff from excavations attenuated before discharge and the scale of new impermeable surfaces too small to alter catchment hydrology. Solar arrays are elevated 1m in areas with surface water depths over 0.3m, and the drainage system is designed to mimic pre-development flow. Flood risk remains



negligible throughout construction and operation, with no measurable impact on surface water or groundwater levels, flow paths or downstream flood risk.

GWDTes

- 4.104 Potential GWDTE habitats are present but are sustained by surface water and waterlogging rather than groundwater. Disturbance of shallow peat and carbon-rich soils is limited, with most peat less than 0.5m deep and areas of peat greater than 1m avoided entirely, disturbance is limited and classed as negligible. Mitigation measures, including watercourse buffers, SuDS, detailed CEMP and careful soil management, ensure effects on GWDTEs are negligible, and no groundwater-related impacts are anticipated during construction or operation.

Private Water Supplies

- 4.105 No private water supplies, Drinking Water Protected Areas, or licensed abstractions are at risk. Pollution prevention, monitoring, and good practice measures within the CEMP ensure that potential impacts to water supplies are effectively controlled, and no significant effects are predicted for any receptor.
- 4.106 Overall, the assessment indicates that subject to the adoption of best practice construction techniques, no significant residual effects are predicted during the construction and operational phases of the Proposed Development. There is also no significant cumulative effect predicted. It is therefore considered that the Proposed Development would not result in any unacceptable impacts upon hydrology, the water environment or flood risk. The Proposed Development would therefore comply with NPF4 Policy 11 part (e) (viii), NPF4 Policy 20, NPF Policy 22, and DGLDP2 policy OP1, IN2, IN7, and IN8.

Biodiversity and Ecology

- 4.107 Assessment of the likely significant effects of the Proposed Development on biodiversity including birds is presented within **Chapter 8: Ornithology** and **Chapter 9: Ecology** of the **EIA Report (Volume 2)**.
- 4.108 NPF4 Policy 11: Energy part (e) (ix) requires project design and mitigation to demonstrate how impacts on biodiversity are addressed. DGLDP2 Policy IN1 and IN2 requires consideration of impacts on the natural environment including biodiversity.
- 4.109 The other key policy considerations in respect of biodiversity and ecology are contained within NPF4 Policy 3: Biodiversity, NPF4 Policy 4: Natural Places, DGLDP2 Policy OP1: Development Considerations (d) Biodiversity and Geodiversity, DGLDP2 Policy NE4: Sites of International Importance for Biodiversity, and DGLDP2 Policy CF2: Green Networks. Collectively, these policies seek to prevent development which would have an unacceptable impact upon designated nature conservation sites, protected species and habitats and to ensure biodiversity enhancement is provided.

Nature Conservation Designations

- 4.110 The Site lies close to internationally and nationally important designations, including the Solway Firth SPA/Ramsar/SSSI approximately 2km south, supporting populations of whooper swan, pink-footed goose, golden plover, lapwing, curlew and gulls. No SPA or Ramsar-designated features are regularly present within the Site itself, with only limited feeding or flight activity recorded. Construction could temporarily disturb birds within 500m of works, but the magnitude is negligible for medium- and high-value species due to low numbers on Site.
- 4.111 Operational effects, including displacement or collision risk, are minor or negligible for all species, with no impacts predicted on the integrity of SPA/Ramsar features or NHZ



populations. Mitigation includes adherence to a CEMP, Breeding Bird Protection Plan, pre-construction surveys for Schedule 1 species, exclusion zones during the breeding season, and general construction best practice, ensuring long-term conservation status is maintained.

Habitats

- 4.112 The Site comprises a mosaic of pastoral and modified grassland fields, hedgerows, treelines, small woodlands, and a southern area of wetland, mire and heath habitats, including Annex I and Scottish Biodiversity List (SBL) priority habitats such as wet woodland, transition mire, quaking bog, degraded blanket bog, rush pasture, and swamp communities.
- 4.113 Construction would lead to the direct, temporary loss of a small proportion of these habitats—0.04ha purple moor-grass and rush pasture, 0.06ha *Deschampsia* neutral grassland, 0.33km treelines, and 0.09km native hedgerow—with significant local or regional effects for SBL priority habitats.
- 4.114 Operational effects are limited, with managed grassland continuing to support grazing and habitat enhancement through the Outline Habitat Management Plan (HMP), delivering 19.52ha of wet meadow creation, 1.25ha broadleaf woodland, and 0.22km hedgerow. Overall, habitat loss is minimised through embedded design, CEMP measures, buffers to watercourses, and restoration/enhancement measures, resulting in no significant residual effects and a net ecological gain.

Protected Species

- 4.115 The Site supports a range of protected fauna, including otter, badger, reptiles, and a rich bat assemblage with at least eight species, including soprano pipistrelle and *Myotis*. Construction could cause significant short-term negative effects on roosting bats if roosts are present within trees to be removed or within 20–30m of works, and the loss of a maternity roost for soprano pipistrelle or *Myotis* species would represent a significant long-term effect without licensing and compensatory measures. Overall, construction would also cause a significant negative effect on biodiversity due to habitat loss and network disruption, although these effects are offset through habitat restoration and enhancement set out in the Outline HMP.
- 4.116 Operational risks are primarily associated with bats, where turbine blades may cause collision or barotrauma, particularly for noctule, Nathusius' pipistrelle, Leisler's bat, and soprano pipistrelle. Mitigation measures include pre-construction surveys, exclusion zones, blade feathering, curtailment in specific wind and temperature conditions, turbine siting away from linear features, and habitat enhancement through the HMP. Reptiles benefit from refugia and habitat improvements, while otter, water vole, fish, and badger are unlikely to experience significant operational effects. Following mitigation, no significant residual effects on protected species are predicted, and the Site is expected to deliver net biodiversity benefits over the long term.
- 4.117 The proposed biodiversity enhancements to be delivered by the Proposed Development are presented in Section 4 of this Planning Statement, with these enhancement measures to be delivered through the proposed HMP. The enhancement, restoration and creation of habitats through the delivery of the HMP would reduce predicted effects on habitat, and protected species. Overall, both the ornithology and ecological assessments therefore predict that the Proposed Development would result in a beneficial effect on biodiversity in the longer term. The Proposed Development therefore complies with NPF4 Policy 3, 4, 11, and DGLDP2 Policies IN1, IN2, OP1(d), NE4, and CF2 in this regard.



Trees, Woods and Forests

- 4.118 Site preparation works for the Proposed Development would include tree felling and associated vegetation clearance in areas designated for infrastructure, alongside initial groundworks in these locations. Further detail can be found in **Chapter 3: Description of Development** of the **EIA Report (Volume 2)**.
- 4.119 The Proposed Development would require tree felling across a combined area of approximately 0.62 ha (estimated fewer than 50 trees, spread over multiple areas of the Site). Given the small number of trees, their scattered distribution, and the fact that the National Forest Inventory does not categorise them as woodland, this does not meet the definition of 'woodland' and the Scottish Government Control of Woodland Removal Policy (Forestry Commission Scotland, 2009) would not apply.
- 4.120 The trees to be removed would predominantly be native species of varying age and condition, including beech, hawthorn, and birch. The trees to be removed would predominantly be native species, of various age and condition, such as beech, hawthorn and birch. In order to compensate for the loss of approximately 0.62ha of trees at the Site, the Proposed Development includes planting of approximately 1.2ha of new native woodland
- 4.121 Overall, it is therefore considered that the Proposed Development complies with NPF4 Policy 3, 4, 11, and DGLDP2 Policies IN1, IN2, OP1(d), NE4, and CF2 in this regard.

Peat and Carbon Rich Soils

- 4.122 The Proposed Development has been considered against relevant national and local planning policies relating to soils, peat, and carbon-rich habitats. NPF4 Policies 5 Soils and 11 Energy support renewable energy where proposals avoid or minimise impacts on carbon-rich soils, deep peat, and priority peatland habitats, with mitigation and restoration secured where disturbance cannot be avoided. DGLDP2 Policies IN1 and IN2 similarly require that wind energy developments are appropriately sited and designed, taking account of environmental constraints, including peat and carbon-rich soils, with impacts minimised and mitigation provided where necessary. Policies NE13–NE15 further seek to protect prime agricultural land, carbon-rich soils, and peat deposits as carbon sinks, requiring that any unavoidable disturbance is minimised, managed appropriately, and restored where feasible. The Proposed Development is designed to comply with these policies, ensuring impacts on soils and peat are avoided or mitigated.
- 4.123 A full assessment of the potential impacts of the Proposed Development on peat and carbon rich soils are set out in **Chapter 10: Geology, Hydrology, Hydrogeology and Peat** of the **EIA Report (Volume 2)**.
- 4.124 Peat depth probing confirms that the Site is predominantly underlain by mineral or shallow peaty soils (<0.5m), and the layout has avoided all areas of deep peat (>1m) in accordance with the mitigation hierarchy set out in NPF4 and SEPA/NatureScot guidance. Peat and carbon-rich soils are treated as high-sensitivity receptors.
- 4.125 During construction, potential impacts include disturbance or degradation of shallow peat and carbon-rich soils, localised erosion, sedimentation and possible effects on the water table from temporary abstractions. These risks are addressed through mitigation by design, micro-siting to avoid peat where encountered, and implementation of a Soil Management Plan secured through the final CEMP and agreed with Dumfries and Galloway Council. With these measures in place, the magnitude of change is assessed as negligible and therefore considered not significant.
- 4.126 During operation, no excavation, movement or storage of peat is anticipated. Should minor maintenance works be required, good practice measures secured through the operational management plan would safeguard peat and carbon-rich soils.



- 4.127 The magnitude of change during operation is therefore negligible and not significant. No cumulative effects are predicted, as there are no other developments within 5km and within the same surface water catchments with potential to affect peat, geology or hydrology. Overall, with embedded mitigation and good practice measures, the Proposed Development is not expected to result in significant effects on peat or carbon-rich soils. The Proposed Development therefore complies with NPF4 Policy 11 and 5, and DGLDP2 IN1, IN2, NE13, NE14, and NE15 in this regard.

Decommissioning

- 4.128 As identified in Section 2 of this Planning Statement, a Decommissioning Restoration and Aftercare Strategy would be agreed with the Planning Authority prior to the commencement of decommissioning. Such a plan and a financial guarantee to secure decommissioning and site restoration can be secured by planning conditions. On this basis the Proposed Development satisfies NPF4 Policy 11 (e) (xi).

Site Restoration

- 4.129 Details of any proposed site restoration works post construction would be included in the CEMP, an outline of which is included **as Technical Appendix 3.2 of the EIA Report (Volume 4)**. In addition, the Applicant would employ an ECoW to oversee these restoration works.
- 4.130 As identified, details of any restoration works post decommissioning would be included in a Decommissioning Restoration and Aftercare Strategy, the requirement for which can be secured by planning conditions.

Cumulative Impacts

- 4.131 Details of NPF4 Policy 11: Energy part (e) (xiii) requires project design and mitigation to demonstrate how cumulative impacts are addressed.
- 4.132 While there would be some significant cumulative landscape and visual effects experienced because of other proposed wind energy projects, as discussed in Section 4 of this Planning Statement, their influence and interaction with the Proposed Development would generally be limited and localised. No other significant cumulative impacts are predicted. It is therefore concluded that the cumulative impacts of the Proposed Development with other schemes would be acceptable and would comply with the requirements of NPF4 Policy 11 part (e) (xiii) and DGLDP2 Policy IN1 and IN2.



5.0 Conclusions

- 5.1 There is now very strong support for renewable energy developments in national energy and planning policy, and in legally binding targets to reduce carbon emissions and increase renewable energy generation. It is widely accepted that the deployment of further onshore wind energy developments at scale are essential to achieving a net zero economy.
- 5.2 NPF4 Policy 11(e) identifies the main environmental considerations that must be addressed in project design and mitigation for renewable energy developments of national importance. The key conclusions against each of these considerations are as follows:
- There would be no significant effects on communities and individual dwellings in terms of noise. Operational turbine noise and fixed-plant noise meet all applicable limits with no significant residual effects.
 - While four properties, all of which are financially involved, may experience effects that exceed the residential visual amenity threshold, these adverse effects are considered localised. On balance, the benefits of the Proposed Development, including its contribution to renewable energy targets and, to a lesser extent, economic benefits, are considered to outweigh these effects.
 - No significant residual effects are predicted across shadow flicker, telecommunications, broadcasting installations, seismic considerations, waste management or public safety. Conditions could be imposed to ensure that the Proposed Development does not result in any unacceptable shadow flicker effects on residential amenity.
 - The identified landscape and visual impacts of the Proposed Development would be localised. Appropriate design mitigation has been applied to reduce the landscape and visual impacts of the Proposed Development to the point where they should be considered acceptable.
 - Mitigation would be employed to ensure that there are no significant impacts upon biodiversity, including on birds. This mitigation could be secured via planning conditions. Overall, the proposed enhancements to be delivered through the HBEMP would have a residual beneficial effect on the habitat and biodiversity value of the site.
 - There would be no significant residual effects on the historic environment. Appropriate design mitigation ensures no significant residual effects on identified heritage features. Heritage assets are avoided, and potential impacts on remains are minimised, and the character, architectural and historic interest, and integrity of all affected settings are preserved.
 - Effects on road traffic and the trunk road network could be minimised by conditions. Conditions could also regulate effects on hydrology, the water environment and flood risk, and could secure the decommissioning and restoration of the Proposed Development. Conditions can also be imposed to ensure that the Proposed Development does not result in any unacceptable impacts on aviation and defence interests. There are no core paths within 5km of the site and therefore no impacts are anticipated.
- 5.3 NPF4 Policy 11 and NPF4 Policy 1 are both instructive that significant weight is to be given to the renewable energy contribution and response to the climate crisis respectively in decision-making. Overall, it is concluded that the limited adverse landscape and visual impacts of the Proposed Development are clearly outweighed by its positive climate change, renewable energy and socio-economic benefits. It is considered that the Proposed Development would not give rise to any unacceptable environmental effects. 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.

- 5.4 For the above reasons and the reasons detailed in this Planning Statement, it is concluded that the Proposed Development complies with the principles and policies contained within the Development Plan (both NPF4 and LDP2).



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