

**RWE**

**Daer Wind Farm  
Planning, Design &  
Access Statement**



## Document history

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# 1. Introduction

Natural Power Consultants Limited (Natural Power) has on behalf of RWE Renewables UK Developments Ltd (the Applicant) submitted an application under Section 36 of the Electricity Act 1989 to seek consent from the Scottish Ministers for the development of Daer Wind Farm. The application also seeks a direction under Section 57(2) of the Town and Country Planning (Scotland) Act 1997 (TCPA) that planning permission for the development be deemed to be granted.

This Planning, Design and Access Statement (PDAS) has been prepared by Natural Power to accompany the Section 36 application, and includes:

- The procedures used by the Applicant to find a suitable location and design for the Proposed Development;
- Details of the Proposed Development;
- The methods proposed by the Applicant to ensure that any residual environmental impacts are avoided/minimised/mitigated;
- Consideration of the Proposed Development against the relevant policies of the Scottish Ministers;
- Consideration of the broader UK and international commitments to climate change; and
- Consideration of the Proposed Development against the Local Development Plan (LDP) for each of South Lanarkshire and Dumfries and Galloway, being the two administrative areas within which the Proposed Development is located, and other material planning considerations.

## 1.1. The Applicant

RWE Renewables UK Developments Ltd (The Applicant) is a subsidiary of the RWE group. The RWE Group has a total installed generation capacity of 9 gigawatts and additional 600 megawatts under construction. The Applicant has the necessary knowledge and experience in renewable energy to develop the Proposed Development.

On 01 July 2020, RWE concluded its major asset swap with E.ON, which involved the integration of innogy Renewables in the UK. This established RWE as one of the UK's, and the world's, leading producers of renewable energy. RWE now stands as the world's second largest offshore wind developer and third largest provider of renewable electricity across Europe.

In the UK, this strengthens RWE's position as a leading energy player. RWE's UK & Ireland footprint extends over 80 sites, located across England, Scotland, Wales and Ireland, employing over 2,600 people and generating over 10% of the UK's electricity needs - enough power for over 10 million homes. This makes RWE the second largest generator in the UK as a whole.

RWE has made ambitious commitments to increase the generation of clean, reliable and affordable electricity. Alongside the ambition to be carbon neutral by 2040, RWE continues to invest heavily in wind power and other emerging technologies, such as hydrogen and floating offshore wind. RWE's planned gross growth capex spend 2020-2022 will be €8-9bn globally, of which around 30-35% will be in the UK.

## 1.2. Consultants

Natural Power, the lead consultancy on the project, has been providing expertise to the renewable energy industry since the company was formed in 1995 and is one of the UK's leading renewable energy and infrastructure consultants. As well as development and EIA services, Natural Power also provide expert advice and due diligence consultancy, site construction management and site operation and maintenance.

Natural Power currently employs over 400 people working full time on providing renewable energy services internationally. In Scotland, Natural Power has offices in Stirling and Inverness, and its headquarters 'The Green House' is an award winning, environmentally friendly office building located in Dumfries and Galloway.

## 2. Environmental Impact Assessment Report

The Environmental Impact Assessment Report (EIAR) has been prepared in line with the Electricity Works (Environmental Impact Assessment) Regulations 2017. The EIAR reports the findings made in the Environmental Impact Assessment (EIA) of the Proposed Development. The scope of the EIA was the subject of a formal scoping opinion from the Scottish Government on behalf of Scottish Ministers, which included input from the relevant Local Planning Authorities, South Lanarkshire Council and Dumfries and Galloway Council, and from other consultees including Scottish Environmental Protection Agency (SEPA), NatureScot (formerly Scottish Natural Heritage (SNH)) and Historic Environment Scotland (HES).

During the EIA process, site visits and desktop assessments, in line with relevant guidance, were carried out to ascertain the potential impacts and mitigation measures to be made. A review of planning and other relevant policies was also made to inform the assessment process and ensure the Proposed Development adequately considered local and national policy.

## 3. Design and Access

Whilst acknowledging that the Proposed Development is submitted under Section 36 of the Electricity Act 1989, as a measure of good practice, the Applicant has provided a detailed written statement about the design principles and concepts that were applied to the Proposed Development before submission in Chapter 2: Site Selection and Design Evolution of the EIAR. Consideration of access is normally required by the Town and Country Planning (Development Management Procedure) (Scotland) Regulations 2013 (the Regulations) and although the details sought by these Regulations are of limited relevance to the Proposed Development, access issues have also been addressed in the EIAR, in particular Chapter 3: Project Description and Chapter 11: Traffic and Transport Assessment. It is therefore considered that this Design and Access Statement, in combination with the EIAR, fulfils the usual planning requirement for a statement on design and access.

The site has been selected through a pro-active prospecting exercise and chosen for its positive balance between high wind yield and low environmental effects. The layout of the site itself has also followed strict criteria to avoid sensitive features and avoid causing direct effects as much as possible. The design strategy has followed the principles within Planning Advice Note 68 – Design Statements. The design strategy for the key elements of the Proposed Development has taken into account the following objectives:

- To maximise site capacity and contribute to renewable electricity production targets;
- To consider and avoid, where possible, on-site constraints such as water courses and sensitive habitats;
- To create a turbine layout which takes into account the scale of the landscape in which it is located;
- To provide a turbine layout which relates, as far as possible, to the landscape character of the site and its surroundings;
- To avoid, where possible, an overly complex and visually confusing layout;
- To achieve a balanced composition of the turbines against the landscape and skyline from key view point locations;
- To consider the relationship to nearby existing wind farms; and
- To reach a design that aims to balance all of the objectives stated above.

The various relevant bodies were consulted during the initial EIA process, feedback from which was fed directly into the iterative design process. Public events were also held, and full details of the consultation process are provided in the Pre-Application Consultation (PAC) Report which accompanies the application.

Chapter 2: Site Selection and Design Evolution of the EIAR details the design process and the rationale for location and the design of the Proposed Development.

Chapter 3: Project Description describes the arrangements for access in and around the site during construction and operational phases.

Chapter 11: Traffic and Transport deals with access primarily of larger components to the site during the construction phase.

Taking Design first the project has been through several design iterations over the last decade responding to changes in policy and support systems for renewables, wind modelling, understanding of constraints, cumulative issues and land availability and the interaction of these various issues.

The current proposed layout comprises primarily of 17 turbines up to 180m to tip. The use of larger turbines is reflective of the need for greater efficiency in the project than when it was first considered thus responding to changes in Government policy and support mechanisms. Modelling of this layout in relation to the wind regime present has given rise to a viable layout without the need for even bigger turbines which would have given rise to additional landscape and visual effects. The combination of site selection and design has nevertheless allowed the relatively contained nature of the site sandwiched as it is between a major infrastructure corridor, a large public utility in the form of the reservoir and surrounded by commercial forestry to be utilised with limited visual impacts beyond the immediate area and in so doing avoiding impacts on sensitive receptors such as settlements, designations, hill tops and recreational routes in the wider surrounding area.

On the ground care has been taken to avoid sensitive habitats, areas of deeper peat given the classification of some of the site and the hydrological environment given the location within a catchment for a public water supply.

Access to the site has been taken to the east to make use of the proximity to the M74 corridor and reduce the need to upgrade the public road infrastructure.

In conclusion, it is considered that the Proposed Development voluntarily meets the usual Design and Access requirements for a major development under the TCPA and Regulations. Although explored in more detail elsewhere in this statement, it is also the Applicant's view that the Proposed Development and its associated mitigation meets the requirements of the Applicant's design strategy as summarised above and that this in turn addresses the principal planning policy requirements for the Proposed Development.

## 4. Overview of the Proposed Development

The Proposed Development is primarily located in South Lanarkshire with some of the component parts as well as the access extending into Dumfries and Galloway local authority area, in the southern uplands of Scotland. It is directly adjacent to the southeast of the Daer Reservoir, with a maximum topographic height of the site approaching 600 m AOD around Earnscraig Hill, and numerous other points on site over 500 m AOD. Daer Wind Farm is approximately 8 km east of the nearest town, Moffat.

The Proposed Development comprises the following main elements:

- Up to 17 wind turbines
  - Turbine foundations
  - External transformer housing
  - Crane pads
- Substation, control building and compound
- Battery/energy storage infrastructure
- Upgraded and new access tracks
- Underground electricity cables connecting infrastructure within the Proposed Development Area
- 2 Anemometry masts
- Signage
- Temporary borrow pits
- Temporary construction and storage compounds, laydown areas and ancillary infrastructure
- Drainage and drainage attenuation measures (as required).

Any public road utilised for access to the site entrance may be utilised subject to upgrades where necessary. Habitat management will be undertaken within the Proposed Development Area. Whilst the land where turbines will be erected is not forested, forest felling will be undertaken to facilitate road widening along the private access track to allow for construction traffic and component deliveries.

The Proposed Development is expected to have an operational life of 35 years. For the EIA, the Applicant has considered turbines with a maximum height from base to blade tip not exceeding 180 m.

A layout plan is provided in Appendix 1.

## 5. National Legal and Policy Framework

### 5.1. The Electricity Act 1989

For the Proposed Development an application is prepared and submitted under Section 36 of the Electricity Act 1989, as it would have an installed capacity in excess of 50 MW. The scheme therefore requires consent from the Scottish Government under Section 36 of the Electricity Act 1989 to construct and operate the Proposed Development, and involves the Scottish Government considering the arguments for and against the Proposed Development before determining an application and awarding any consent.

Pursuant to Schedule 9 of the Act, regard is given to the desirability of preserving natural beauty, conserving flora and fauna and geological or physiographical features of special interest and of protecting sites, buildings and objects of architectural interest. The Scottish Ministers will consider the extent to which the Applicant has taken measures, within reason, to mitigate any effect the proposal might have on these features. There is also a requirement when exercising relevant functions related to the generation of supply of electricity for a licence holder to seek to avoid, so far as reasonably practicable, causing injury to fisheries or fish stocks.

These matters have been addressed as appropriate in the design of the project and assessments of these features have been undertaken and are described along with a summary of the proposed mitigation measures, in the relevant sections of the EIAR to mitigate potential environmental effects upon these assets. It is therefore considered that the Proposed Development is in accordance with the relevant requirements of the Electricity Act 1989.

### 5.2. The Electricity Works (Environmental Impact Assessment) (Scotland) Regulations 2017

Regulation 3 states that a Section 36 application for consent which requires an EIA shall not be granted unless the requirements of the regulations have been satisfied. The Applicant must submit an EIAR and adhere to the proper publicity procedures. In determining the application, the Scottish Ministers must take the findings of the EIAR and other environmental information into account.

The EIA identifies the direct and indirect potential significant effects of the Proposed Development during each stage of the development. It considers these impacts on the following factors and the interaction between those factors: population and human health; biodiversity; land, soil, water, air and climate; and material assets, cultural heritage and the landscape.

The EIAR has been structured in such a way as to best present the impacts on the factors outlined above. Relevant maps and plans of the Proposed Development have also been included within the EIAR. The relevant potential significant effects created by the Proposed Development have been assessed and presented in the EIAR. The design alternatives have also been considered in Chapter 2 of the EIAR. It is therefore considered that the requirements of the Regulations have been duly followed.



### 5.3. The Town and Country Planning (Scotland) Act 1997 (as amended)

With the application submitted under Section 36 of the Electricity Act 1989, the Applicant also seeks direction under Section 57(2) of the Town and Country Planning (Scotland) Act 1997 (as amended) (TCPA) that planning permission for the development be deemed to be granted.

Both Dumfries and Galloway Council and South Lanarkshire Council are statutory consultees for the application, as the Proposed Development is located within their local authority boundaries. Although carrying less weight than a determination under the TCPA, the relevant development plans for the Proposed Development along with other guidance and emerging policies of the planning authority are considered in Sections 9 and 10 of this planning, design and access statement.

Whilst many of the provisions have still to be implemented, the Planning (Scotland) Act 2019 makes explicit provision that the National Planning Framework will have an enhanced status in the determination of planning applications and includes “*meeting any targets relating to the reduction of emissions of greenhouse gases, within the meaning of the Climate Change (Scotland) Act 2009, contained in or set by virtue of that Act*” as one of its statutory outcomes.

It also sets out a new ‘Purpose of Planning’ which is “*to manage the development and use of land in the long term public interest*”. The Act goes on further to explain that anything which contributes to sustainable development is to be considered as being in the long-term public interest.

### 5.4. Climate Change Legislation and Energy Policy

Amid the growing concern globally of climate change and the risks it poses to habitats and civilisations, the Paris Agreement symbolises the latest international effort to limit its effects. **The Paris Agreement** was negotiated in Paris in December 2015 between 195 countries. Nations including the UK signed the Agreement in April 2016 to make the global plan to limit global warming below 2 °C legally binding.

The Paris Agreement entered into force in November 2016. In addition to the target of keeping global warming below 2 °C of pre-industrial levels, there is a commitment to pursue efforts to limit the temperature increase to 1.5 °C.

The Scottish Government is a devolved administration and is responsible for climate change and energy issues in Scotland. In line with the UK’s agreement with the Kyoto Protocol, the Paris Agreement and the targets set out in the European Directive 2009/28/EC, the Scottish Government brought into force:

- The Climate Change (Scotland) Act 2009;
- The Scottish Energy Strategy 2017; and
- The Scottish Onshore Wind Energy Policy Statement 2017.

These documents are the main drivers in steering Scotland towards a low carbon economy and meeting international targets on climate change and renewable energy generation.

**The Scottish Energy Strategy**, published in December 2017, sets targets for the energy system for 2030, building on those presented by the 2020 Routemap for Renewable Energy in Scotland 2011 which is an extension and update of the Scottish Renewables Action Plan 2009. It includes the aim to meet 50% of Scotland’s whole energy demand from renewables by 2030; a target which more recent analysis has suggested will be largely dependent on onshore wind to deliver.

The document outlines a vision to drive Scottish Energy Production for 2050 and stresses the importance of renewable energy in achieving a low carbon economy in Scotland. The importance of renewable energy to Scotland’s economy is also recognised.

More explicitly the **Scottish Onshore Wind Energy Policy Statement** sets out the vital role of onshore wind in meeting these targets.

Since the publication of these landmark documents, considerable additional weight has been afforded to the matters raised by them through the publication (amongst others) of;

- The Climate Change Plan 2018;

- The Climate Change (Emissions Reduction Targets) (Scotland) Act 2019;
- Net Zero - The UK's Contribution to Stopping Global Warming 2019;
- Climate Emergency: Scotland;
- Reducing emissions in Scotland Progress Report to Parliament Committee on Climate Change October 2020;
- Protecting Scotland, Renewing Scotland: The Government's Programme for Scotland 2020-2021; and
- The Sixth Carbon Budget, Climate Change Committee, December 2020

Whilst significant delays in the process have meant that these have yet to be referred to in national planning policy, in the meantime the overall direction of travel within these documents is abundantly clear and important and is a material consideration that should be given due consideration and weight in the determination of this application. These points are explained further below.

## 5.5. The Climate Change (Scotland) Act 2009

The Climate Change (Scotland) Act 2009 is a key commitment of the Scottish Government which establishes a framework and creates mandatory climate change targets to drive greater efforts at reducing greenhouse gas emissions in Scotland.

Section 44 of the Climate Change (Scotland) Act 2009 placed a duty on every public body to act:

- In the best way calculated to contribute to the delivery of the emissions targets in the Act;
- In the best way calculated to help deliver the Scottish Government's climate change adaption programme; and
- In a way that it considers is most sustainable.

Owing to its energy production from a renewable source, emission savings, economic and social effect, as noted in the relevant chapters of the EIAR, the Proposed Development will make a significant contribution to achieving the targets set by the Climate Change (Scotland) Act 2009 and should be given due cognisance by the relevant public authorities when exercising their duties under this legislation. As noted above, specific provisions have now been incorporated into the TCPA by the Planning (Scotland) Act 2019 to ensure that the implementation of the Climate Change (Scotland) Act 2009 is reflected in Scottish planning legislation and policy moving forward. Any explicit updates on this situation will need to be reflected in the decision-making process over the course of this application's determination, but the strong direction of travel towards meeting the objectives of the Climate Change (Scotland) Act 2009 should be given due weight in the meantime.

## 5.6. Scotland's Energy Strategy 2017

Scotland's Energy Strategy (SES) was published in December 2017 and outlines a vision for the future of energy production in Scotland for 2050. The vision is centred on achieving a strong, low carbon economy in which renewable energy is recognised to play an important part. Specifically, page 43 states:

*"Our energy and climate change goals mean that onshore wind must continue to play a vital role in Scotland's future – helping to decarbonise our electricity, heat and transport systems, boosting our economy, and meeting local and national demand."*

SES states the target to produce 50% of Scotland's energy demand for heat, transport and electricity, as well as to increase the productivity of energy use across the Scottish economy, by 30%.

SES also sets out the aim to achieve a largely decarbonised economy by 2050. This represents a significant progression in policy terms towards meeting wider climate change goals and targets to those which were reflected in the Scottish Planning Policy (SPP) in 2014. Although these more recent policies have not been formally carried over into Scottish planning policy it is expected that this and more recent shifts in policy and targets will be included as key themes in NPF4 when it is published in 2021. In the meantime, this movement in Scottish Government policy terms (and the lag that has been created in planning policy) is itself a material consideration in

the determination of this application. Accordingly, it is the Applicant's view that greater weight must be given to these more recent and demanding targets than more historic planning policies.

An important driver of the SES is the recognition of the requirements of the renewable energy industry to improve efficiency by utilising taller wind turbines with larger rotor diameters to operate in the market following the removal of government subsidy through Renewable Obligation Certificates (ROCs) and uncertainty around future Contracts for Difference (CfD) allocation rounds (AR) including the eligibility of onshore wind to compete beyond AR4 (expected in 2021). Enabling these requirements is essential in order to meet the ambitious, but achievable, targets set out in the SES.

SES recognises that Scotland's energy system is changing and there has been a sharp rise in harnessing the country's renewable resources as a means of energy production. It is also recognised that renewables are a key driver in Scotland's economy. It also recognises throughout the need for energy storage as part of a new smarter energy model.

The 'Annual Energy Statement' produced by the Scottish Government in 2019 provided an update on progress towards targets since the publication of SES in 2017. In terms of plans for future actions the Statement highlighted the need to:

*Reiterate the strategic case for a route to market for renewable technologies in Scotland, and for network investments and regulatory outcomes which support our strategic priorities.*

The second 'Annual Energy Statement' produced by the Scottish Government in 2020 provides further update highlighting that whilst renewable energy generation had continued to grow since 2019 the commitment to achieve a 75% reduction in emissions by 2030 remains challenging and needs a concerted effort by public and private sectors for this to be achieved.

The Proposed Development has necessarily been designed to operate in the current and emerging market conditions and, as such, will contribute positively towards reaching the targets set out in the SES and towards the estimated 17 GW of installed renewable capacity required by 2030 in order to reach these targets.

## 5.7. Scottish Onshore Wind Policy Statement 2017

The Scottish Onshore Wind Policy Statement (OWPS) recognises the wind energy sector is a big contributor to the Scottish economy. The sector supports an estimated 7500 jobs in Scotland (58% of the UK onshore wind sector) and generated £3bn in turnover in 2015. The OWPS furthermore recognised that the future of the market for onshore wind is uncertain following the removal of RO in 2015 and lack of opportunities under subsequent CfD rounds. However, it is believed this can be facilitated with the right regulatory framework and Government support.

The Scottish Government states that it will support new and repowered wind farms and recognises that if wind farms are to continue to contribute to Government targets without subsidies, this inevitably means the use of larger turbines, where appropriately located. Such wind turbines can capture more of the available wind resource and improve the efficiency of wind farm developments. With the necessary support for such large turbine projects by Scottish Ministers, statutory and non-statutory consultees, the ambitious 2030 energy target can be met.

The OWPS recognises the importance of onshore wind to the Scottish economy and for meeting energy needs: *"In order for onshore wind to play its vital role in meeting Scotland's energy needs, and a material role in growing our economy, its contribution must continue to grow. Onshore wind generation will remain crucial in terms of our goals for a decarbonised energy system, helping to meet the greater demand from our heat and transport sectors, as well as making further progress towards the ambitious renewable targets which the Scottish Government has set".*

Since 2017 the role of onshore wind in the emerging energy mix has become more established and onshore wind projects in Scotland have shown that they can compete in both the open market and under CfD.

The Proposed Development is therefore considered to adhere to the OWPS and will contribute positively to the Scottish economy and towards meeting renewable energy targets. It is imperative that decision makers give due weight to the content of this important document especially in relation to the age and consequent relevance of other policy documents in assessing the merits of this application.

## 5.8. The Climate Change Plan 2018

Published in February 2018, the Climate Change Plan sets out Scotland's strategy to meet emission reduction targets between 2018 and 2032, taking a visionary approach. It is published under the Climate Change (Scotland) Act 2009 and is intended to be the last plan published under this Act, with future plans being proposed under the Climate Change (Emissions Reduction Targets) (Scotland) Act 2019. The Climate Change Plan set out the emissions reductions pathway towards 2032, with the target of reducing emissions by 66% against the 1990s levels. It was acknowledged that "this will be an enormous transformational change" (page 22 of Climate Change Plan).

The Plan states the following targets for the electricity sector, aligning itself with the SES (2017):

- By 2032, Scotland's electricity system will supply a growing share of Scotland's energy needs and by 2030, 50% of all Scotland's energy needs across heat, transport and electricity will come from renewables.
- By 2032, Scotland's electricity system will be largely decarbonised and be increasingly important as a power source for heat and transport.

Electricity will be increasingly important as a power source for heat and transport to charge Scotland's growing fleet of ultra-low emission vehicles. At its inception the Proposed Development was intended to make a meaningful contribution to these commitments and targets. Noting that these targets have increased further in the meantime highlights an even more pressing need for this development.

## 5.9. Net Zero - The UK's Contribution to Stopping Global Warming 2019

This UK initiative on Climate Change is a reassessment of emissions targets. The 'Net Zero – The UK's contribution to stopping global warming' report (May 2019) responds to a request from the Governments of the UK, Wales and Scotland, asking the Committee on Climate Change (CCC) to reassess the UK's long-term emissions targets. The new emissions scenarios draw on ten new research projects, three expert advisory groups, and reviews of the work of the Intergovernmental Panel on Climate Change (IPCC) and others.

The report's key findings are that:

- The CCC recommends a new emissions target for the UK: net-zero greenhouse gases by 2050 (acted upon by The Climate Change Act 2008 (2050 Target Amendment) Order 2019).
- In Scotland, the CCC recommends a net-zero date of 2045, reflecting Scotland's greater relative capacity to remove emissions than the UK as a whole (acted upon by the Climate Change (Emissions Reduction Targets) (Scotland) Act 2019).
- In Wales, the CCC recommends a 95% reduction in greenhouse gases by 2050.

A net-zero greenhouse gas (GHG) target for 2050 will deliver on the commitment that the UK made by signing the Paris Agreement. It is considered achievable with known technologies, alongside improvements in people's lives, and within the expected economic cost that Parliament accepted when it legislated the existing 2050 target for an 80% reduction from 1990.

However, this is only possible if clear, stable and well-designed policies to reduce emissions further are introduced across the economy without delay. Current policy is considered insufficient for even the existing targets. The alignment of the Proposed Development with climate change commitments and more recent Scottish energy policies provides an example of the type of change which this report identifies as being necessary to meet the targets.

## 5.10. Climate Emergency

Scottish First Minister Nicola Sturgeon declared a "Climate Emergency" in her speech to the SNP Conference in April 2019, stating:

"As First Minister of Scotland, I am declaring that there is a climate emergency. And Scotland will live up to our responsibility to tackle it." Referring to the recently published CCC advice, Ms Sturgeon added "if that advice says we can go further or go faster, we will do so".

Furthermore, Climate Change Secretary Roseanna Cunningham made a statement on 14 May 2019 to the Scottish Parliament on the 'Global Climate Emergency', again, with reference to the recent CCC Report:

"We acted immediately with amendments to our Climate Change Bill to set a 2045 target for net zero emissions - as we said we would do. If agreed by Parliament, these will be the most stringent legislative targets anywhere in the world and Scotland's contribution to climate change will end, definitively, within a generation. The CCC was clear that this will be enormously challenging....".

The Minister also highlighted the important role of the planning system stating:

"And subject to the passage of the Planning Bill at Stage 3, the next National Planning Framework and review of Scottish Planning Policy will include considerable focus on how the planning system can support our climate change goals".

In September 2019 the Scottish Government further responded to the global climate emergency by adopting an ambitious new target to reduce emissions and become net zero by 2045.

## 5.11. Climate Change (Emissions Reduction Targets) (Scotland) Act 2019

The Act responds directly to the Paris Agreement and other policies and commitments set out above by amending the Climate Change (Scotland) Act 2009 and setting a legally binding Net Zero target for Scotland to be achieved by 2045, five years ahead of UK as a whole. In doing so, it provides further legislative backing to the urgent and pressing need for these targets to be taken seriously in the context of decisions surrounding the infrastructure which is needed to deliver these targets in Scotland. The Proposed Development provides a substantial opportunity to contribute towards the delivery of these legally binding targets within the timescales established in this Act.

## 5.12. Reducing emissions in Scotland Progress Report to Parliament, Committee on Climate Change, October 2020

This CCC report provides a useful benchmark of Scotland's progress towards meeting climate change targets. Whilst noting that good progress was made during the 2010's towards reducing emissions, this was largely through the increase in renewable energy generation alongside the closure of Scotland's last coal fired power station in 2016. The challenge ahead will be focussed on accelerating the decarbonisation of other sectors, primarily through further electrification. The paper recognises how the Scottish Government has taken important steps to 'embed Net Zero as a core Government policy, framing major fiscal and Parliamentary events around climate change'.

The document also highlights that net zero emissions and improved climate resilience are integral to the Covid-19 recovery noting that the Scottish Government must take actions to improve resilience by integrating adaption into all Government Policy.

Within the table of recommended actions the CCC recommends the following to the Scottish Government:

Table 1

**Recommendation:** Consolidate Scotland's net zero and adaptation objectives more closely within the National Performance Framework. **Timing:** Next Parliament

**Recommendation:** Align the next National Planning Framework (NPF4) closely to Net Zero and adaptation, providing a favourable planning and consenting regime for a low carbon and efficient energy system and climate-resilient infrastructure. **Timing:** 2021

Table 6

**Recommendation:** Align the National Planning Framework (NPF4) to a net-zero energy system – enforcing a favourable planning and consenting scheme for onshore wind and other renewables in manner that is consistent

*with other policies on land use, supporting repowering and life extension of existing wind power in Scotland, and aligning with adaptation priorities under the Scottish Climate Change Adaptation Programme. **Timing:** 2021-2022*

Given the lifespan of the Proposed Development and the intention of these statements to meet targets for 2030 and beyond this intention also needs to be given due weight and consideration ahead of the NPF4 being adopted.

### 5.13. Protecting Scotland, Renewing Scotland: The Government's Programme for Scotland 2020-2021

The Scottish Government published its strategy “Protecting Scotland, Renewing Scotland” in September 2020 which sets out actions and a recovery plan for 2020 and beyond in response to COVID-19.

In the introduction delivered by First Minister Nicola Sturgeon it states that *“We must use this moment to make significant advances to deliver the fairer, greener, more prosperous Scotland we all want to see”*. She continues saying *“Central to that recovery is a new national mission to help create new jobs, good jobs and green jobs”*. The First Minister also highlights the importance of a green recovery stating: *“Even before the pandemic, we knew we had significant work to do in order to improve the state of nature and meet our statutory commitment to be a net zero society by 2045. The impacts of the crisis have reinforced the need for that, but also the opportunities it presents”*.

As a result of this, the Scottish Government has committed to dedicating £100m over the next five years to a green job fund. The funds will be invested into business and organisations which support the prospects of greener job creation across Scotland.

This will place a green recovery at the forefront and will offer many businesses a chance to diversify and innovate. It also provides an opportunity for people to retrain and upskill in new high growth areas.

Furthermore the First Minister states in her introduction to the strategy that:

*“We will immediately put a clear new focus on our updated Climate Change Plan, ensuring it reflects our new starting point and the central importance of a green recovery to Scotland's progress, and the Infrastructure Investment plan will reflect our commitment to tackling climate change. We will ensure our rural economy and Scotland's rich natural resources and biodiversity are central to our economic, environmental, and social wellbeing”*.

### 5.14. The Sixth Carbon Budget, Climate Change Committee, December 2020

The sixth carbon budget sets out the CCC's recommendations for the UK's path to Net Zero in 2050. In doing so it requires a 78% reduction in UK territorial emissions between 1990 and 2035 bringing forward the previous 80% target by 15 years and describes the goal of legislating for the Budget as soon as possible being the strongest statement of our ambition to tackle climate change.

Within the electricity generation paper which accompanies the budget the CCC notes that all net zero scenarios see new onshore wind generation being deployed by 2050 and that its modelling doubles the onshore wind capacity in the UK to 25-30 GW in all net zero scenarios.

### 5.15. Section 5 Conclusions

Taken together the documents listed above provide compelling reasons to support the Proposed Development. At a national level, these documents provide an overriding and undisputable needs case, if one were still needed, for additional levels of renewable energy in general and onshore wind in particular in order to facilitate the change towards low carbon technologies and meet our Net Zero Targets. The role of and need for larger more efficient wind turbines to meet these targets in a cost-effective manner is paramount as is the need for wind farms to be located in areas with good wind resource. These drivers have all fed into the siting, design and layout of the Proposed Development alongside onsite constraints and planning policy considerations. The balance of these matters is considered in the remainder of this statement including whether or not national and local planning policy has kept pace with this rapidly changing position.

## 6. Scottish Planning Policy and Advice

National planning policy and advice in Scotland is practised through the following hierarchy:

- National Planning Framework 3 (NPF3) provides a spatial vision for the future growth of Scotland. It provides the strategic policy context for decisions and actions by the Scottish Government and its agencies;
- Scottish Planning Policy (SPP) provides a succinct statement of national planning policy;
- Circulars contain guidance on policy implementation through legislative or procedural change; and
- Planning Advice Notes (PAN) provide information and advice relevant to particular policies.

Given its importance to the determination of this application, the emerging position in relation to NPF4 which will replace both NPF3 and the SPP in 2022 has also been considered.

### 6.1. National Planning Framework 3 (NPF3)

Scotland's third National Planning Framework was laid in the Scottish Parliament on 23 June 2014.

NPF3 is the spatial expression of the Scottish Government's Economic Strategy – with a focus on supporting sustainable economic growth and the transition to a low carbon economy. NPF3 sets out the ambition for Scotland as a whole and highlights the distinctive opportunities for sustainable growth in our cities and towns, or rural areas and our coast and islands.

NPF3 promotes the greater use of renewable energy, supporting further deployment of onshore wind farms and moving Scotland further towards becoming a “Low Carbon Place”.

The Proposed Development adheres to the vision set by NPF3 and will contribute to the reduction of greenhouse gases by producing electricity from a renewable source and reducing the need for fuel from finite resources. It will increase the percentage of electricity supplied by renewable sources and move Scotland closer towards having a low carbon economy and reaching energy supply targets. The Proposed Development is therefore supported in principle by NPF3.

Whilst NPF3 remains extant at the time of writing, it is imperative that it is viewed within the context of the current Net Zero ambitions of the Scottish Government, as well as the emerging NPF4, and its enhanced commitment to address climate change through the Scottish planning process.

### 6.2. National Planning Framework 4 (NPF4)

Whilst NPF4 is still in preparation, the Scottish Government published Scotland's Fourth National Planning Framework Position Statement in November 2020. The position statement brings together the thinking that has emerged within Scottish Government from early rounds of consultation in order to “set a new course for planning in Scotland “(Ministerial Foreword).

Taking forward the concept of how Our Future Places will look on page 2 the statement makes the significant point that:

*“We cannot afford to compromise on climate change. If we are to meet our targets, some significant choices will have to be made. We will make these choices next year as we move towards a draft National Planning Framework 4 for public consultation and Parliamentary scrutiny, but it is already clear that significant effort will be required. We will have to rebalance the planning system so that climate change is a guiding principle for all plans and decisions. We will need to focus our efforts on actively encouraging all developments that help to reduce emissions. This is not about restricting development. Our aim is to help stimulate the green economy by facilitating innovation, greener design and place-based solutions.”*

Continuing this same theme, the position statement further identifies “Supporting renewable energy developments, including the re-powering and extension of existing wind farms, new and replacement grid infrastructure, carbon capture and storage and hydrogen networks” as one of 12 key opportunities on page 2 which will help to reduce emissions.

The NPF4 will embed the principles of sustainable development and focus on achieving net zero emissions as one of its four key outcomes.

In order to meet net zero emissions the Scottish Government “*We will actively facilitate decarbonised heating and electricity generation and distribution*”.

Onshore and Marine renewables have been highlighted as development priorities for planning to address. Policies are expected to help meet our climate change targets, secure investment and good quality jobs and, whilst recognising that we have to balance the need for new infrastructure with impacts on communities and the environment, this is set against the need for policies in NPF4 to be flexible and keep pace with technological changes.

At the start of page 8 it is noted that the spatial strategy will prioritise climate change and emissions reduction to achieve net zero including interim targets, furthermore stating that “*Climate change will be the overarching priority for our spatial strategy...an urgent and radical shift in our spatial plan and policies is required.*”.

In order to deliver the infrastructure needed to reduce emissions, NPF4 is expected to confirm the global climate emergency as a material consideration in applications for appropriately located renewable energy developments. The need for significant further investment to support the decarbonisation of heat and transport is recognised and the roll out of renewable electricity is highlighted as a priority. The position statement also highlights the role that NPF4 will play in delivering wider energy strategies including but not limited to the SES discussed elsewhere in this planning statement.

The NPF position statement promotes an infrastructure first approach to community development and notes that planning must do all it can to support our green recovery reiterating the need for policies to be flexible enough to respond to rapid and significant economic and social change.

In summary the position statement confirms the direction of travel that has been evident in Scottish Government policy since the publication of the SES and OWPS in 2017, but has thus far failed to be given due weight and consideration by some policy and decision makers operating under the planning system in Scotland. The position statement however also confirms that these and other policies aimed at meeting net zero and contributing towards a green recovery should and will be at the heart of the Scottish planning system in the future and that substantial policy change is required to achieve these outcomes. As set out in Section 5 of this planning statement, the Proposed Development is already aligned with this direction of travel and the specifics of the national energy policies and, as such, can expect to be supported by the NPF4 when it is laid in the Scottish Parliament in autumn 2021. NPF4 will form part of the Development Plan when it is adopted by Scottish Ministers in 2022.

### 6.3. Scottish Planning Policy (SPP)

Published in June 2014 (and updated in December 2020), the current SPP provides a statement of Scottish Government Policy on nationally important land use. As well as providing a context for different types of development in Scotland, it also sets out policy on how the planning system should operate and how planning authorities should prepare development plans and supplementary guidance and determine planning applications.

In terms of its Core Principles for the planning system, SPP makes it clear that the system for planning decisions under the TCPA should be plan led, to the point where decision making is transparent and predictable, that constraints on development are necessary and proportionate and that all interests are engaged as early as possible, all seeking to ensure there is a clear focus on the quality of outcomes.

Although the SPP has in some respects been superseded in energy policy terms by the publication of the SES and OWPS in 2017, the Proposed Development has nevertheless considered the relevant constraints and opportunities presented by the site, had due regard to the development plan for the area, included consultation with all stakeholders including the planning authority, statutory consultees and local communities from an early stage throughout the design and assessment process (see the accompanying Pre-Application Consultation (PAC) Report for further information) and has therefore been developed in accordance with the Core Principles of SPP. Relevant sections of SPP are described in more detail in relation to the Proposed Development in the paragraphs below.



### 6.3.1. A Low Carbon Plan

SPP states in paragraph 152 that:

*“NPF3 is clear that planning must facilitate the transition to a low carbon economy, and help to deliver the aims of the Scottish Government’s Report on Proposals and Policies. Our spatial strategy facilitates the development of generation technologies that will help to reduce greenhouse gas emissions from the energy sector. Scotland has significant renewable energy resources, both onshore and offshore. Spatial priorities range from extending heat networks in our cities and towns to realising the potential for renewable energy generation in our coastal and island areas”.*

SPP states in paragraph 154 that:

*“The planning system should:*

- support the transformational change to a low carbon economy, consistent with national objectives and targets, including deriving:*
  - 30% of overall energy demand from renewable sources by 2020;*
  - 11% of heat demand from renewable sources by 2020; and*
  - the equivalent of 100 % of electricity demand from renewable sources by 2020;*
- support the development of a diverse range of electricity generation from renewable energy technologies – including the expansion of renewable energy generation capacity – and the development of heat networks;*
- guide development to appropriate locations and advise on the issues that will be taken into account when specific proposals are being assessed;*
- help to reduce emissions and energy use in new buildings and from new infrastructure by enabling development at appropriate locations that contributes to:*
  - Energy efficiency;*
  - Heat recovery;*
  - Efficient energy supply and storage;*
  - Electricity and heat from renewable sources; and*
  - Electricity and heat from non-renewable sources where greenhouse gas emissions can be significantly reduced.”*

The Proposed Development will increase the amount of renewable energy generation in Scotland, thus helping to support the transformational change to a low carbon economy consistent with national objectives and targets. A carbon balance assessment report has been produced and SEPA’s Carbon Calculator completed, to determine the carbon payback time for the Proposed Development (see EIAR Technical Appendix 4 for full details). The results from the carbon calculator reveal that the Proposed Development would have effectively paid back its expected carbon debt from manufacture, construction, impact on habitat and decommissioning within 1.7 years, if it replaced the fossil fuel electricity generation method. Following the expected **~33 years generation of carbon-free renewable electricity**, it is calculated that the Proposed Development will result in over **3,743,124 tonnes of CO<sub>2</sub> emission savings** when replacing fossil fuel electricity generation. As the negative payback period represents approximately 6% of the operational period and the positive contribution 94% it is possible to conclude that the positive contribution is statistically significant. The proposed development therefore illustrates a significantly positive net impact in terms of its contribution towards the reduction of greenhouse gas emissions from energy production. The carbon dioxide emissions savings and renewable electricity generating capacity are consistent with the aims of SPP from transitioning to a low carbon economy and increased renewable energy supply. Again, it is noted in this regard that the targets presented in the SPP have been superseded by those in the SES, OWPS, other climate change legislation, policy and reports published since 2017, including the Net Zero 2045 target as set out above and should be considered with this in mind.

### 6.3.2. Onshore Wind

SPP has a section dedicated to onshore wind. Paragraph 161 states that:

*“Planning authorities should set out in the development plan a spatial framework identifying those areas that are likely to be most appropriate for onshore wind farms as a guide for developers and communities. Development plans should indicate the minimum scale of onshore wind development that their spatial framework is intended to apply to. Development plans should also set out criteria that will be considered in deciding all applications for wind farms of different scales – including extensions and re-powering – taking account of the considerations set out at paragraph 169.”*

Paragraph 169 states *“Proposals for energy infrastructure developments should always take account of spatial frameworks for wind farms and heat maps where these are relevant. Considerations will vary relative to the scale of the proposal and area characteristics but are likely to include:*

- *net economic impact, including local and community socio-economic benefits such as employment, associated business and supply chain opportunities;*
- *the scale of contribution to renewable energy generation targets;*
- *effect on greenhouse gas emissions;*
- *cumulative impacts – planning authorities should be clear about likely cumulative impacts arising from all of the considerations below, recognising that in some areas the cumulative impact of existing and consented energy development may limit the capacity for further development;*
- *impacts on communities and individual dwellings, including visual impact, residential amenity, noise and shadow flicker; • landscape and visual impacts, including effects on wild land;*
- *effects on the natural heritage, including birds;*
- *impacts on carbon rich soils, using the carbon calculator;*
- *public access, including impact on long distance walking and cycling routes and scenic routes identified in the NPF;*
- *impacts on the historic environment, including scheduled monuments, listed buildings and their settings;*
- *impacts on tourism and recreation;*
- *impacts on aviation and defence interests and seismological recording;*
- *impacts on telecommunications and broadcasting installations, particularly ensuring that transmission links are not compromised;*
- *impacts on road traffic;*
- *impacts on adjacent trunk roads;*
- *effects on hydrology, the water environment and flood risk;*
- *the need for conditions relating to the decommissioning of developments, including ancillary infrastructure, and site restoration; Scottish Planning Policy 41*
- *opportunities for energy storage; and*
- *the need for a robust planning obligation to ensure that operators achieve site restoration.*

All such constraints have been taken into account with regards to the Proposed Development and fed into the detailed design process outlined in section 2 of this statement. This included consideration of the spatial framework for wind farms as set out in Table 1 of the SPP. In this regard the site sits mostly in Group 3 which are ‘Areas with potential for wind farm development’. Those parts of the site which fall within Group 2 due to the strategic identification of carbon rich soils have been found after ‘further consideration’ not to have ‘any significant effects’ on the reasons for the Group 2 identification. Taking both together it is clear that the Proposed Development is in an area which has strategic support from the SPP.

The resulting impacts of the siting and design of the Proposed Development have been assessed during the EIA process with the outcome that with the exception of landscape and visual impacts there were no residual significant effects identified. Having regard to the landscape and visual effect the potential significant effects are limited by design and topography to the area close to the wind farm itself avoiding significant impacts on settlements and other receptors further afield. The results of the EIA are presented in further detail in the relevant

chapters of the EIAR but confirm that the various factors outlined in paragraph 169 of the SPP have been taken into account.

In addition to the construction and operational impacts, paragraph 169 requires decommissioning and restoration to be taken into account. The Proposed Development has a high-level strategy for decommissioning which is presented in Chapter 3: Project Description in Volume 1 of the EIAR and is considered in each of the different assessments carried out. A detailed decommissioning strategy would be developed in agreement with both Councils towards the end of the operational period of the Proposed Development.

The Proposed Development including its inclusion of energy storage facilities is therefore considered to be in accordance with the most directly relevant part(s) of the SPP in so far as these remain relevant following the publication of the more recent SES, OWPS and other climate change legislation and policies.

### 6.3.3. Promoting Rural Development

The overall approach advocated in SPP is that of a proactive stance to development in rural areas. Relevant parts of Paragraph 75 of the SPP state that the planning system should:

- *“In all rural and island areas promote a pattern of development that is appropriate to the character of the particular rural area and the challenges it faces; and*
- *Encourage rural development that supports prosperous and sustainable communities and businesses whilst protecting and enhancing environmental quality.”*

The Proposed Development will be situated in a relatively remote upland rural area.

EIAR Chapter 14: Socioeconomics reports that during the construction and operational phase of the development, the Proposed Development is predicted to generate jobs and contracting opportunities in this relatively remote part of South West Scotland. Based on information provided by the Applicant of another similar scale project within its portfolio at construction stage it is expected that the Proposed Development could directly support approximately 84 Full Time Equivalent (FTE) local jobs and approximately 255 FTE jobs within Scotland for the duration of the construction phase. Based on the information provided by the Applicant of the similar scale project within its portfolio, it is reasonably expected that the Proposed Development could directly support approximately 24 FTE local jobs and approximately 33 FTE jobs within Scotland during the operational phase.

Investment from the construction and operation of the Proposed Development is expected to trickle down to provide additional spending within this relatively remote rural area, thus contributing to the local economy throughout the construction period and operational lifetime of the Proposed Development. The Proposed Development will be subject to paying both LPA business rates worth millions of pounds over the operational period. In addition, the Proposed Development will also provide a direct economic benefit in the form of land rents to the various hosting landowners and an indirect benefit where these funds are reinvested in the local area.

The Proposed Development will also add to the supply of renewable electricity locally which will contribute to the wider decarbonisation of the local economy. The Proposed Development is therefore considered to be in line with the SPP’s vision for rural development.

### 6.3.4. Valuing the Historic Environment

The SPP supports the recognition of the contribution made by cultural heritage to our economy, cultural identity and quality of life and describes the historic environment in paragraph 136 as a *“key cultural and economic asset and a source of inspiration that should be seen as integral to creating successful places.”* As per paragraph 137, the *“planning system should:*

- *promote the care and protection of the designated and non-designated historic environment (including individual assets, related settings and the wider cultural landscape) and its contribution to sense of place, cultural identity, social well-being, economic growth, civic participation and lifelong learning; and*
- *enable positive change in the historic environment which is informed by a clear understanding of the importance of the heritage assets affected and ensure their future use. Change should be sensitively*

*managed to avoid or minimise adverse impacts on the fabric and setting of the asset, and ensure that its special characteristics are protected, conserved or enhanced.”*

In line with SPP paragraph 140 the siting and design of the Proposed Development took into account the sensitivities of the historic environment in the area having consulted the records held by both local authorities. EIAR Chapter 9: Cultural Heritage confirms that having done so there are no direct or indirect significant effects associated with the construction, operation and decommissioning of the Proposed Development predicted in relation to cultural heritage. In line with SPP paragraph 150 a Written Scheme of Investigation is also proposed to manage the potential discovery of low sensitivity features within the Proposed Development Area.

### 6.3.5. Valuing the Natural Environment

The SPP recognises the value of the Scottish environment for enjoyment, recreation and sustainable economic activity as well as the role for planning in protecting, enhancing, promoting access and supporting sustainable use of our environmental resources. Paragraph 194 of the SPP sets out criteria for the planning system to achieve this.

The development of a wind farm at Dear Reservoir is a positive change which has carefully utilised the distinctive landscape character to avoid and minimise the additional significant impacts beyond those within the immediate environment of the Proposed Development.

Through its layout and design the Proposed Development has sought to conserve and enhance the peatland habitats found on the site as well as promoting the protection of the sensitive water environment surrounding the reservoir.

Siting and design has also sought to minimise the impact on carbon rich soils such that the Proposed Development fits with the requirements of SPP Table 1 in that regard.

The Proposed Development sets out a strategy for woodland replacement noting that this applies to commercial rather than natural or ancient woodland.

As highlighted above the significant investment arising from the Proposed Development provides an opportunity to restore and improve some of the degraded habitats found within the site as well as opportunities for access.

It is worth noting that although impacts on Wild Land have been considered in the assessment of the Proposed Development the specific test in paragraph 215 of the SPP does not apply since it is not itself in an area of wild land.

### 6.3.6. A Successful, Sustainable Place

The SPP recognises the importance of supporting sustainable economic growth and regeneration, setting out the role that the Scottish Government expects the planning system to play in the sustainable economic growth of Scotland.

### 6.3.7. SPP Update

In December 2020 and following consultation earlier in 2020, Scottish Government published ‘Scottish Planning Policy – finalised amendments: December 2020’. This coincided with a revised version of the 2014 SPP being published with an Errata which included updates from the ‘finalised amendments’ resulting in changes to paragraphs 29, 30 and 33 which altered the way in which the SPP deals with the ‘presumption in favour of sustainable development’ whilst changes to paragraph 125 updated the position in respect of maintaining a 5-year housing land supply; the latter point is of no relevance to the Proposed Development and is not considered further.

Alterations to paragraph 32 deal specifically with planning applications and the status of the development plan in that regard so do not apply directly to this application. Likewise the opening sentence of paragraph 33 continues to rely on the position of the development plan and material considerations and so has limited relevance in this case. The second sentence of paragraph 33 does however make it clear that where a proposal is for sustainable development the presumption in favour of sustainable development is a material consideration in favour of the proposal. The development plan is itself a material consideration and, in the case of this application submitted under Section 36 of the Electricity Act 1989, it does not have primacy in decision-making and must be viewed

alongside the new presumption and other material policy considerations. The defining characteristics of a sustainable development are provided in paragraph 29 and the requirements for development plans are provided in paragraph 30. These are discussed below.

Paragraph 29 establishes that planning policies and decisions should support sustainable development which is then described according to a set of principles. These are set out below alongside an assessment against the Proposed Development.

- *giving due weight to net economic benefit.* This has been addressed in Chapter 14 of the EIAR which provides details of both the short and longer term economic benefits of the Proposed Development.
- *responding to economic issues, challenges and opportunities, as outlined in local economic strategies;* South of Scotland Enterprise was launched in April 2020 to drive forward a new and fit for purpose economic future for the South of Scotland. Included in its list of Key Opportunities is the South's substantial land and energy resources which have significant potential to be a catalyst for green growth and green jobs.
- *supporting good design and the six qualities of successful places;* Chapter 2 of the EIAR as well as section 3 of this statement set out the design objectives for this Proposed Development and the substantial effort which has gone into designing a sustainable and fit for purpose development at this location.
- *supporting town centre and regeneration priorities;* Due to its rural location the Proposed Development will not directly support town centres. However, the investment generated by the Proposed Development will contribute to the regeneration priorities of the land and communities surrounding the Proposed Development.
- *supporting delivery of accessible housing, business, retailing and leisure development;* The Proposed Development will provide support for other businesses and leisure opportunities in the surrounding area.
- *supporting delivery of infrastructure, for example transport, education, energy, digital and water;* The provision of energy infrastructure partly on Scottish Water land supports the utility's Strategic Plan of generating 300% of its electricity usage by 2030 through its own assets or those hosted which is a target endorsed by Scottish Government<sup>1</sup>. In addition, being close to the M74 corridor which already functions as a major infrastructure corridor for energy and transport, provides direct and obvious support for the Proposed Development in this location.
- *supporting climate change mitigation and adaptation;* Similarly, the direct impact of the Proposed Development in mitigating the impacts of climate change at a global level through the generation of renewable electricity whilst helping to adapt at the local level through habitat enhancement provides an obvious level of support from this principle.
- *improving health and well-being by offering opportunities for social interaction and physical activity, including sport and recreation;* By reducing a reliance on greenhouse gases and supporting opportunities for recreation through enhancement of the SUW, the Proposed Development has direct support from this principle.
- *having regard to the principles for sustainable land use set out in the Land Use Strategy;* The land management measures which are included both as mitigation and enhancements in this proposal (such as drain blocking for peat restoration) provide further opportunity for support under this principle. It is also noted that the 2020 Consultation on Scotland's Third Land Use Strategy noted specifically the changing context surrounding the Strategy in terms of how Climate Change is affecting rural land use but also how rural land use can contribute to actions to meet Climate Change targets and address the impact of Climate Change.
- *protecting, enhancing and promoting access to cultural heritage, including the historic environment;* The Proposed Development does not set out to actively promote or enhance access to cultural heritage but does facilitate improved access generally and does so whilst protecting existing assets (refer to EIAR chapter 9).
- *protecting, enhancing and promoting access to natural heritage, including green infrastructure, landscape and the wider environment;* The Proposed Development both protects and enhances important habitats (EIAR Chapter

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<sup>1</sup> Available online: <https://docs.google.com/viewerng/viewer?url=https://sw-prod-93-north-eu-502220-cd.azurewebsites.net/-/media/ScottishWater/Document-Hub/Key-Publications/Strategic-Plan/030220StrategicPlanASustainableFutureTogether.pdf> (last accessed 03/03/2021)

6) and whilst not promoting the fact does facilitate better access to these assets where necessary. The location and design of the Proposed Development manages to protect the landscape in so far as it is possible to do so with a proposal of this nature avoiding significant impacts on nationally important designations and reducing the potential impact on local receptors where it has been possible and practical to do so (refer to EIA chapter 5).

- *reducing waste, facilitating its management and promoting resource recovery*; Waste generated during the construction and operation of the Proposed Development will be managed in accordance with guidelines in place at the time. At the end of its useful life plant can be removed from the site and, where possible, reused and/or recycled, and the site restored to whatever use is deemed most appropriate at that time.
- *avoiding over-development, protecting the amenity of new and existing development and considering the implications of development for water, air and soil quality*. The location and design of the Proposed Development has been specifically designed taking into consideration surrounding uses including residential receptors. Design considerations are highlighted in Chapter 2 of the EIA as well as in section 3 of this statement. The residual effects of the Proposed Development considering embedded and additional mitigation measures are considered throughout the EIA. EIA Chapter 15 also provides a summary of the synergistic (combined) effects of the Proposed Development on residential amenity as well as the combined or synergistic effects on soil and water quality. Construction and operation in the vicinity of a public reservoir will have to be undertaken with care but, in developing other similar sites in the south of Scotland, the Applicant and its predecessor companies has shown that this can be done successfully. The Proposed Development will help to reduce carbon emissions in the longer term and includes opportunities for restoration and enhancement of existing habitat towards Biodiversity Net Gain which may not have occurred in a 'do nothing' scenario. Finally, as per Scottish Water's Strategic Plan discussed earlier, developing a project of this nature on Scottish Water land will contribute significantly to the goals set by Scottish Ministers to increase the level of renewable electricity generation by Scottish Water's own assets and those it hosts.

As a result of the above it is considered that the Proposed Development accords with the defining principles of a sustainable development set out in SPP paragraph 29 and, as such, there should be a presumption in favour of this sustainable development as set out in paragraph 33.

By comparison, paragraph 30 sets out what is expected of development plans in this regard. As set out elsewhere in this statement, it is extremely doubtful whether the adopted development plans of relevance to this proposal adequately reflect the sustainable development principles outlined above. In particular, it could be argued that by adding to the constraints envisaged by SPP the LDPs and their associated guidance:

- are not consistent with the SPP and its presumption
- have not sought out opportunities for this type of sustainable development which are sufficiently flexible in relation to changing circumstances,
- have not adequately provided for the expansion of the renewables sector as highlighted in other policy drivers,
- are not up to date with the need for additional levels of renewable energy generation or climate change targets,
- are not in line with the SPPs spatial strategy for onshore wind and as such do not provide confidence to stakeholders that outcomes for climate change and sustainable development can be achieved.

In light of this the SPP and its revised presumption should be afforded additional weight over the development plans as a material consideration.

### 6.3.8. Planning Advice Notes (PAN)

#### **Specific Advice Sheet: Onshore Wind Turbines**

Specific Advice Sheet: Onshore Wind Turbines (updated in 2014) has replaced Planning Advice Note (PAN) 45 – Renewable Energy and is a source of specific advice for the development of onshore wind farms. The document provides specific advice to inform both development plans, decision-makers and developers involved in onshore wind projects. It is updated online and identifies key issues to be considered within the design and development process.

## Other PAN

In addition to the Specific Advice Sheet: Onshore Wind Turbines is a range of topic and procedural Planning Advice Notes which have been considered in the design and assessment of the Proposed Development, including:

- PAN 1/2013 – Environmental Impact Assessment and Annex A
- PAN 51 – Planning, Environmental Protection and Regulation
- PAN 60 – Planning for Natural Heritage
- PAN 68 – Design Statements
- PAN 73 – Rural Diversification
- PAN 75 – Planning for Transport
- PAN 3/2010 – Community Engagement
- PAN 1/2011 – Planning and Noise
- PAN 2/2011 – Planning and Archaeology

The Proposed Development has progressed with careful consideration of the advice contained within the Specific Advice Sheet: Onshore Wind Turbines and other PAN. The design and assessment of the Proposed Development has evolved to comply with the advice supplied and has been clearly addressed throughout the EIAR. The Proposed Development is therefore considered to be in accordance with the general principles of these PAN.

### 6.3.9. Section 6 Conclusions

This section has considered the wide range of national policies and legislation which are relevant to the consideration of this S36 application. The importance of this suite of national policies and legislation to the determination of wind farm applications was usefully highlighted in the 2020 approval of the Paul's Hill II Wind Farm in Moray (WIN-300-3). The decision notice highlights that in his recommendation to Ministers, Reporter David Buylla noted that:

*"I find that the proposal can draw support from the development plan and SPP and from more recent expressions of national policy and strategy. Recent developments in response to climate change, particularly the enactment of legislation in 2019 that commits Scotland to net zero carbon emissions by 2045 are also supportive."*

Section 8.33 of the accompanying report further reiterates that:

*"For the reasons I set out in Chapter 2, I find that the support this proposal can draw from SPP has been strengthened by the publication of subsequent policy and strategy documents such as the OWPS and SES. Very recent changes to legislation that commit Scotland to net zero carbon emissions by 2045 add some further support to the proposal, given the clear policy position that on-shore wind energy is a positive contributor to the objective of lower carbon emissions. Further support can be drawn from the clear recognition by the CCC of the need for much greater progress on carbon emissions reduction in the future, which has led to the declaration of a climate emergency."*

For similar reasons to those cited by the reporter at Paul's Hill, it is the Applicant's view that the Proposed Development at Dear Reservoir should also draw support from these policies and the strengthening commitment to climate change targets.

## 7. Development Plans including Supplementary Guidance

The statutory presumption in terms of the development plan under the TCPA does not apply either to the Section 36 determination or the grant of any deemed planning permission, which differentiates the determination of an application under Section 36 from the determination of a planning application made under the TCPA. As such, there is no requirement for the determination to be made in accordance with the development plan unless material considerations indicate otherwise. Notwithstanding, it is acknowledged that the relevant provisions of the development plan are a consideration in relation to the Section 36 determination process, but it is for the decision maker to determine the weight to be attached to each of the relevant considerations. This statement sets out the

Applicant's view of the relative weight which ought to be afforded to the development plan/s in this case given the terms of the revised presumption in favour of sustainable development set out in the updated 2020 version of the SPP.

Given the overlapping and interdependent nature of the relevant supplementary guidance notes that have been produced by both local authorities, these have been included in this section of the Planning Statement. The relative weight to be afforded to these again will depend on whether they have been adopted as statutory guidance but also, in accordance with the above, whether they are considered to be consistent with the requirements of the updated SPP.

## 7.1. Clyde Plan 2017

Clyde Plan provides the strategic element of the Development Plan in the South Lanarkshire area. Chapter 7 of Clyde Plan sets out the approach which has been adopted to develop the City Region as a Low Carbon Place, including the overall approach to Climate Change, Delivering Heat and Electricity and the Onshore Wind Spatial Framework. The first two of these reflect the position of Scottish Government whilst the third, alongside the accompanying Diagram 6, confirm that the site is primarily within an Area with Potential for Wind Farm Development (SPP Group 3). Those areas of the site which are a Group 2 consideration for the purposes of SPP Table 1 are so mapped due to the presence of Peat and Carbon Rich Soils which have been assessed as part of the EIAR (chapter 8). Having concluded that any significant effects on the qualities of Group 2 areas have been substantially overcome by siting, design or other mitigation as required by SPP and that there are no significant residual effects on peat, the Proposed Development is clearly aligned with the strategic requirements of the Clyde Plan.

Policy 10 provides guidance for Local Development Plans as well as setting out that Proposals should accord with Diagram 6. The opener to the Policy also states that in order to support the Vision of the plan and transition to a low carbon economy support should be given where appropriate to renewable energy technologies and associated infrastructure. Given the general support in the plan and the level of compliance with Diagram 6 it is concluded that the Proposed Development has a strategic level of support from the Clyde Plan.

## 7.2. South Lanarkshire Local Development Plan 2015

The 2015 South Lanarkshire Local Development Plan (SLLPD) is now over 5 years old having been adopted in June of that year. Although the tilted balance which existed under the 2014 version of the SPP is no longer explicit in the 2020 version, given its age, the wealth of climate change and energy legislation and policy which has emerged since its adoption and a consideration of these matters under SPP paragraph 30, it is still appropriate to consider the following summary of the SLLDP within the context of the revised presumption in favour of sustainable development which is set out in Section 6.3.6 of this statement.

The strategic vision of the SLLDP is '*To promote the continued growth and regeneration of South Lanarkshire by seeking sustainable economic growth and social development within a low carbon economy whilst protecting and enhancing the environment*'. This application provides an opportunity to meet this vision and so is aligned in strategic terms with the SLLDP.

Under this vision the plan sets out a number of cross cutting policies which seek to deal with the strategic implications of the overall strategy and include policies on its Spatial Strategy, Climate Change, Green Belt and Rural Area, Development Management and Placemaking, Community Infrastructure Assessment, General Urban Areas/Settlements. Whilst noting that some of these have more relevance than others the Proposed Development has nevertheless been considered against the relevant parts of these policies.

Policy 1 Spatial Strategy reflects the wording of the Strategic Vision and provides further support for sustainable economic growth and regeneration, protection and enhancement of the built and natural environment, and movement towards a low carbon economy, as well as development that accords with the policies and proposals in the development plan and supplementary guidance. Figure 3.1 establishes that the vision will be delivered through a series of 'Themes', 'Objectives' and 'Spatial Strategy'.

Amongst the stated objectives the LDP seeks to;

- Support countryside business opportunities (economy and regeneration),



- Support renewable energy generation in locations with landscape and infrastructure capacity (infrastructure),
- Support the use of renewable energy on appropriate sites (environment).

Meanwhile the Spatial Strategy seeks to;

- Safeguard the green network and identify opportunities for its enhancement or extension;
- Direct developments to locations with infrastructure capacity and sustainable transport options; and
- Direct developments to sustainable locations.

Whilst these objectives and the spatial strategy are further implemented through the various policies of the plan, it is clear that there is again strategic support for the Proposed Development in the LDP.

### 7.2.1. Policy 2: Climate Change

This states that proposals for new developments must where possible seek to minimise and mitigate against the effects of climate change by, amongst other things, being sustainably located, utilising renewable energy sources, being designed to be as carbon neutral as possible, using low carbon technologies, avoiding areas of medium to high flood risk, having no significant adverse impact on water, soils, air quality, biodiversity and green networks, providing electric charging points and minimising waste. Not only does the EIAR which accompanies this application demonstrate how these have been addressed but, by generating substantial additional renewable energy in the local area, the Proposed Development will further provide the opportunity for the strategy of the plan to be realised by generating power which will support further green growth in the South Lanarkshire area.

Policy 3 Green Belt and Rural area, provides that the rural area functions primarily for uses appropriate to the countryside. Whilst the policy is primarily focussed on built development rather than the infrastructure, which is necessary to deliver the plan's vision, the location of a wind farm within an area which already supports public water infrastructure as well as neighbouring wind farms is considered to be in accordance with the intention of this policy and the vision of the SLLDP.

Policy 4 Development Management and Placemaking has not been specifically considered here because the development management requirements for this type of development are considered under Policy 19 and the relevant SG.

Similarly as the Proposed Development does not require additional public infrastructure to support it then Policy 5 Community Infrastructure Assessment is of limited relevance. It is noted however that the Proposed Development will help provide rent to Scottish Water and contribute to the amount of renewable energy generated on Scottish Water owned land. The community benefits fund from the Proposed Development can also be used to support community infrastructure in nearby villages for example. Policy 6 General Urban Area / Settlements is focussed on urban environments and is not considered further.

Taken together, the Proposed Development is considered to be well aligned with the vision and strategic policies of the plan.

### 7.2.2. Specific policies

The policies below have been considered relevant to the proposed Daer Wind Farm development.

### 7.2.3. Policy 19: Renewable Energy

This policy states that renewable energy infrastructure development will be supported subject to an assessment against the principles set out in the SPP (2014) particularly paragraph 169.

Section 6.3 of this report provides an assessment against the SPP, as well as its more recent update, and concludes that the SPP is supportive of this type of development.

In particular an assessment against the criteria in paragraph 169 of the SPP is provided in section 6.3.2 of this planning statement. This concluded that the siting, design and subsequent assessment of the Proposed Development had taken account of all of the considerations required by paragraph 169. Having done so the Proposed Development is considered to meet the principal test of this key policy.

The policy also sets out the Council's intention to produce statutory supplementary guidance which accords with the SPP, which contains the spatial framework for onshore wind and which sets out policy considerations against which all proposals for renewable energy infrastructure will be assessed. Any development proposals must also accord with other relevant policies within the SLLDP.

Further assessment under the detailed terms of the Supplementary Guidance which has been prepared since the adoption of the SLLDP is provided in Section 7.3 whilst further assessment against the other relevant policies in the LDP are set out below.

In principle it is concluded that the Proposed Development accords with the key requirements of the primary determining policy of the SLLDP.

#### 7.2.4. Policy 15: Nature and Historical environment

The policy states that new development will not be permitted where they may have an adverse effect on a nature conservation site designated for its biodiversity or geodiversity importance. The Proposed Development is not located within a nature conservation site, nor is it predicted to have any significant impacts upon surrounding sites.

The policy also states the development should seek to avoid any detrimental impacts on protected species including appropriate mitigation where necessary. Both avian and non-avian species have been assessed within the EIAR in Chapter 6: Ecology and Chapter 7: Ornithology.

Embedded mitigation and best practice through appointment of an Environmental Clerk of Works (ECoW) during construction and adherence to a Construction Environment Management Plan (CEMP) and a Species Protection Plan will ensure that potential effects upon ecological and ornithological interests are not significant in EIA terms.

The Proposed Development is not located within a designated nature conservation site although there are pockets of peat within the site which have resulted in these parts being a Group 2 consideration for the purposes of SPP Table 1. The EIAR has conducted an assessment in line with the recommendations of Policy 15 and SPP Table 1 and found potentially significant effects on the relevant features had been substantially overcome by siting design and mitigation. The Proposed Development is therefore considered to be acceptable under this element of Policy 15.

Policy 15 states that all listed buildings, archaeological sites and scheduled monuments will be protected. Their protection, maintenance, enhancement and appropriate active use and conservation will also be encouraged. Developments that would have a negative effect on the character, integrity or setting of listed buildings, scheduled monuments or other archaeological sites would not be allowed.

The Cultural Heritage Assessment, in Chapter 9 of the EIAR has identified that, with appropriate mitigation, there will be no residual significant direct effects on cultural heritage interests. Turning to indirect effects the Chapter concludes that despite the presence of assets within the study area, the Proposed Development would not significantly affect the setting of these assets either individually or cumulatively when considered against other existing and proposed wind energy developments.

Taken together it has been concluded that the Proposed Development is in accordance with Policy 15 and that any mitigation required to secure this outcome can be achieved by way of appropriately worded planning conditions.

### 7.3. South Lanarkshire Local Development Plan 2 (SLLDP2)

The proposed South Lanarkshire Local Development Plan 2 (SLLDP2) was published for consultation in 2018. The plan was due to be adopted in 2020 and although at the time of writing (Feb 2021) this had not yet happened it is likely that the SLLDP2 will be in place by the time this application is developed.

The SLLDP2 continues many of the themes that are set out in the current SLLDP and continues to support sustainable economic growth, move towards a low carbon economy protect the environment and mitigate against the effects of climate change. Part 11 of Policy 1 Spatial Strategy provides specific support for renewable energy developments in appropriate locations.

Policy 2 provides an enhanced position on Climate Change supporting the use of renewable resources and giving reference to the SES (2017). Part 4 recognizes the need for zero carbon generating technologies to reduce emissions. Part 6 of Policy 2 also requires that new development has no significant adverse impacts on water, soils, air quality, biodiversity, blue green networks and Natura Sites whilst part 8 requires the inclusion of opportunities for the creation and enhancement of green infrastructure. Part 10 recognises that the need for electric vehicle charging,

Overall, in so far as it is relevant Policy 2 provides direct support for the Proposed Development as well as enhanced recognition of the needs case behind the proposal.

Policy 5 is more geared towards the needs of the built environment but requires all development to be well designed and integrated with the local area. Given that this has been achieved by the Proposed Development it is considered to have support in so far as it is relevant.

Despite the importance of renewable energy to the green recovery and to achieving sustainable economic growth in South Lanarkshire the Economy section of the plan gives little direct reference to the energy sector either as an employer or as a pre-requisite to providing sufficient green energy for new and existing businesses to grow and develop. Despite this, Paragraph 4.7 does recognise that certain business and industrial developments will have specific locational needs and or require direct access to the motorway network. The Proposed Development is one with specific locational needs, which will benefit from being close to the motorway network and will provide jobs, contracting opportunities and renewable energy for other users in this rural part of South Lanarkshire.

Policy 14 Natural and Historic Environment states that the council will assess all development proposals in terms of their impact on the historic and natural environment and sets out criteria for doing so. This is achieved by the identification of different categories of development. The EIAR has shown that the Proposed Development will not have any significant adverse impacts on category 1 or category 2 designations. As the Proposed Development is within a category 3 area by virtue of its Special landscape Area status, there is a potential conflict with this part of the policy. However the policy wording does allow development to be permitted in this situation where the effects are outweighed by social or economic benefits. It is the Applicant's view the benefits in terms of contribution to national targets as well as local benefits are sufficient in this case to override the locally significant landscape effects of the Proposed Development, noting the mitigation and enhancement measures which are proposed.

The policy contains an additional requirement on landscape grounds referring to the 2010 Landscape Character Assessment and where relevant the 2017 Landscape Capacity Study for Wind Energy. These are dealt with elsewhere in this statement.

Section 7 of the SLLDP2 includes policy 18 Renewable Energy which again relies heavily on the 2014 SPP for both its Spatial Strategy and Development Management criteria. This is broadly similar to Policy 19 in the current LDP so is not specifically re-examined here. The principal difference between the two is that the guidance which had still to be prepared when the 2015 LDP was adopted has now been produced and incorporated into the SLLDP as appendices. The content of these is considered elsewhere.

### 7.3.1. SLLDP2 Conclusions

Although not yet adopted the draft SLLDP2 provides an indication of the direction of travel for the new LDP. In general terms it is broadly similar in its approach and key policies to the current LDP. Whilst reference is given to the emerging policy position on climate change as it was in 2018 when the SLLDP2 was published it has not been able to reflect the ongoing policy shifts which have occurred in the meantime and may still be behind this particular curve assuming it is adopted at some point in 2021. With this in mind there is limited additional weight that can be given to the SLLDP2 at this stage.

## 7.4. South Lanarkshire Supplementary Guidance

### 7.4.1. South Lanarkshire Local Development Plan Supplementary Guidance 10: Renewable Energy

This guidance was produced in 2015 in order to support Policy 19 in the SLLDP and states in its own introduction that it forms part of the development plan. In doing so it draws on a number of supporting documents including the Landscape Capacity Study for Wind Energy May 2015 Technical Report. As with the SLLDP above, the age of this guidance relative to more recent legislation and policy on Climate Change is an important consideration in the weight to be afforded to this guidance.

This is evident in Chapter 2 of the guidance which quotes a number of now superseded targets for renewables as its policy context.

Chapter 4 provides SLC's response to the need for a Spatial Framework for wind energy as required by the SPP paragraph 161 and sets this out within the context of Table 1 from the SPP. The resultant Spatial Framework shown on page 18 of the guidance indicates that the majority of the development site is within Group 3: Areas with Potential for Wind Energy Development whilst the remainder is in Group 2: Areas of Significant Protection due to the presence of peat which has been classified by SNH (now NatureScot) as 'carbon rich soils, deep peat and priority peatland habitat'. Under the terms of Table 1 these areas have been assessed in Chapter 8 of the EIAR allowing the conclusion to be drawn that significant effects on these qualities have been "*substantially overcome by siting design or other mitigation*". In reality therefore the site can be considered as if it were all Group 3 and therefore having potential for wind energy development.

Chapter 6 of the guidance sets out the development management considerations taking its lead in principle from SPP 169 but with the addition of criteria relating to local designations and the Council's view on cumulative considerations. These detailed matters are then summarised in Chapter 7 which provides a checklist with which wind farms of more than 4 turbines 'must comply'. Chapter 7 of the guidance also contains an additional 'Policy' RE2, the status of which is not clear since it has no clear foundation in the SLLDP which the guidance aims to support. RE2 nevertheless goes beyond SLLDP Policy 19 by stating that energy developments will only be acceptable if they accord with the relevant guidance set out in Section 6 and Table 7.1. Further doubt over the relevance and status of this 'policy' also flows from the 'guidance' being more than 5 years old at the time of writing and, as set out above, having been largely superseded in climate and energy terms by a wealth of more recent legislation and policy.

Despite questions over its relevance and weight in this application the content of the guidance has been considered in the detailed design of the Proposed Development and in the assessment of impacts set out in the EIAR. The EIAR demonstrates that the Applicant has taken reasonable measures to avoid and mitigate the potential effects of the Proposed Development against the criteria set out in this guidance allowing a conclusion to be drawn that the Proposed Development accords with this guidance in so far as it is possible and relevant to do so. Any conflict between the Proposed Development and the guidance is due to the inherent conflict between this guidance and the more recent and, arguably, more relevant national policy and legislation which supports this proposal. This requires proper and proportionate application of the planning balance and, in this case, the SPP presumption in favour of sustainable development. This planning balance consideration is important in the approach taken to the wording of this guidance to the extent that compliance with all aspects is practically impossible to achieve. and the position must be considered in the round. The Applicant is however satisfied that an appropriate balance has been struck between the need for the development, its various benefits and its assessment against a reasonable interpretation of the criteria listed in SPP 169.

### 7.4.2. The South Lanarkshire Landscape Capacity Study for Wind Energy May 2015 Technical Report

The South Lanarkshire Landscape Capacity Study for Wind Energy (SLLCSWE) supports South Lanarkshire Council's Supplementary Guidance 10: Renewable Energy. This study sets out to consider the 'capacity' of the South Lanarkshire landscape to accommodate wind energy development including an assessment of cumulative landscape capacity. The study assesses landscape sensitivity and provides a value of the different Landscape

Character Types (LCTs) and Landscape Character Areas (LCAs) in South Lanarkshire. Whilst properly undertaken assessments of landscape sensitivity have been broadly accepted as a starting point for the landscape and visual impact assessment (LVIA), the leap to pre-judging 'capacity', particularly where the level of development expected to be accommodated within an area has not been identified, has been broadly rejected by industry and government through the appeal and public local inquiry (PLI) process as a step too far.

This is usefully illustrated in the 2016 appeal decision for the Larbrax Wind Farm in Dumfries and Galloway (PPA-170-2105) where reporter David Buylla noted in paragraph 26 in relation to the Dumfries and Galloway Landscape Wind Farm Capacity Study (DGLWCS):

*"The DGLWCS is a useful indicator of the relative ease with which a particular landscape might accommodate a particular type of wind farm. However, it is no substitute for a site and proposal-specific assessment of landscape and visual effects, as has been carried out by the appellant, or the development-specific analysis that has been carried out in response to this proposal by the planning authority and SNH. The fact that the DGLWCS effectively rules out the possibility of developing a wind farm of the scale proposed anywhere within the Rhins peninsula is a material consideration, but in no way obliges me to dismiss this appeal."*

This position is now reflected in advice from NatureScot on its website (accessed 16/02/2021) which advises in relation to this topic that:

*"Wind energy studies should not be referred to as capacity studies as no regional targets are available on which to determine the 'capacity' for development. Landscape Sensitivity Assessments should reflect their purpose, which is to provide a strategic assessment of relative landscape and visual sensitivity to certain defined forms of development."*

SLLCSWE identifies turbines T1 – T11 and T17 of the Proposed Development as being located in the Lowther Hills (around Daer Water) LCA of the LCT 13: Southern Uplands. The study describes the LCA as *"characterised by large scale rolling hills surrounding the Daer Reservoir and bordering Dumfries and Galloway. The area lies between two very large windfarm developments (Clyde to the north and Harestanes to the south in Dumfries & Galloway). The hills are largely unforested, are relatively remote and undeveloped and lie entirely within the Lowther Hills SLA. The Southern Upland Way passes through this area."*

The sensitivity assessment in SLLCSWE is considered in more detail in EIAR Chapter 5: Landscape and Visual Impact Assessment with the conclusion that, whilst significant effects on landscape are predicted, these will be localised and not significant when considered across the relevant LCTs as a whole. Furthermore the number of landscape and visual receptors which are likely to experience significant effects are themselves limited in number and further mitigated by the presence of other wind farms in the surrounding area.

However, as outlined above, the SLLCSWE goes beyond this to suggest, without the benefit of the detailed and site-specific LVIA nor any reference to the level of deployment required to meet Net Zero targets that there is no capacity for turbines in excess of 120 m and describes the development capacity of the LCA as *"Further development should be strictly limited to maintain differences in character from the much more developed area (i) around Clyde windfarm to the north and maintain a gap between Clyde windfarm and Harestanes windfarm to the south in Dumfries & Galloway. Developments lying between these two extensive schemes would reduce their separation, increasing the potential for visual coalescence of cumulative clusters."*

This position has no basis in national policy and, having been established in response to the decision making process surrounding Clyde and Harestanes 15 years previous, ignores the extent to which the needs case as reflected in subsequent policy and legislative changes has altered substantially in the meantime. This now outdated position has been superseded by site specific findings of the LVIA in Chapter 5 of the EIAR. It is concluded having regard to the findings of the EIAR that the Proposed Development has considered this 'guidance' in so far as it is practical and reasonable to do so.

The Proposed Development has been sited and designed to maintain a gap between it and Clyde and it and Harestanes wind farms. It has followed the Design principles set out in Section 3 of this statement report and has, through the LVIA process, been found to have met these objectives. The gaps between the Proposed Development, Harestanes and Clyde are reflective of the pattern of development which already exists between the component clusters of the Clyde development. Furthermore the position of the Daer Reservoir site within the

landscape and the careful design of the Proposed Development is such that it has a much lower landscape and visual impact than either Clyde or Harestanes, and does not add significantly with either in cumulative terms.

Any unresolved matters arising from consideration of this proposal against this guidance are as a result of the inherent conflict between the content of the guidance and more relevant Government policy as well as the precedent established in Public Inquiry and Appeal Decisions. It is the Applicant's view that, in this situation, limited weight can be given to the prescriptive detail of this Technical Report in the determination of this application.

#### 7.4.3. Tall Wind Turbines: Landscape Capacity, Siting and Design Guidance Addendum to Landscape Capacity Study for Wind Energy 2016 (2019)

This guidance was produced in 2019 in response to turbines now being larger than envisaged in the previous guidance. Matters of scale relative to the surrounding landscape have been considered in the design of the proposal and subsequently assessed in the LVIA Chapter of the EIAR.

Consideration has also been given to LCTs in the LVIA Chapter of the EIAR. The Proposed Development sits within the Southern Upland LCT which is one of the three LCTs identified as having capacity for turbines of more than 120 m to tip. The careful siting and design of the Proposed Development within this particular part of the LCT allows for a more detailed assessment of actual effects than is speculatively predicted in the Guidance. The spacing of the Proposed Development away from the existing Clyde Wind Farm avoids any consideration as an immediate extension of Clyde. The only comparison that can be made is that the spacing between the Proposed Development and Clyde is similar to that which already exists in the LCT between the component parts of Clyde. Furthermore the siting of the Proposed Development close to the M74 corridor is recognised in the guidance as having reduced levels of sensitivity. Any perception of a conflict between the guidance and the Proposed Development is entirely down to the high-level preconceptions which fed into the guidance, which have now been properly considered throughout the detailed design process and assessed in the LVIA. On the basis that guidance is intended to provide guidance and that LVIA is intended to allow for a proper and detailed assessment of the actual impacts of a proposal, it is the Applicant's view that any differences between what was foreseen in the guidance and the reality of a proper assessment should not interfere with a positive consideration of this application.

This position is usefully reflected in the decision to approve the Paul's Hill II Wind Farm in Moray (WIN-300-3). In paragraph 8.34 of his report, Reporter David Buylla noted:

*“Turning to the development plan, I conclude that the most relevant policy is Policy ER1 of the LDP. Where other LDP policies are relevant to the proposal, their expectations are covered by the requirements of this policy. I find that, when its objectives are considered as a whole, the proposal would satisfy the requirements of this policy. In relation to the requirement to address the guidance set out in the LCS, I agree with the council that the proposal has not followed the expectation in that document that very large turbines be kept away from the edges of LCT 11. However, this does not necessarily mean, as the applicant suggests the council has assumed, that the proposal is not supported by Policy ER1. I am satisfied that the proposal has addressed the guidance in the LCS and that, due to the proposal-specific considerations that apply (and the consequent effects it would have) can be supported by this policy.”*

It is therefore the Applicant's view that potential conflicts with strategic and generalised guidance supporting the LDP should not prevent a positive site-specific assessment under the SLLDP as a whole where a well-designed proposal has been deemed by the application team following a robust EIA process to be acceptable in all other terms.

#### 7.5. Dumfries and Galloway Local Development Plan (LDP2) 2019

The relevant local development plan relating to Proposed Development is the Dumfries and Galloway Local Development Plan 2019 (DGLDP2) which was adopted on 03 October 2019. The key policy requirements of the DGLDP2 are outlined in the following paragraphs.

The aim of DGLDP2 is to provide a planning framework and guide the future use and development of land in towns, villages and the rural area, as well as indicating where development should and where it should not happen.

DGLDP2 will be kept under review and will be replaced at least every five years. The overarching principle of the DGLDP2 is that:

*“all development proposals should support sustainable development, including the reduction of carbon and other greenhouse gas emissions”.*

DGLDP2 recognises that climate change is a pressing issue globally and outlines policies specific to renewable energy developments. There are two policies directly relevant to the Proposed Development; IN1 and IN2. These are further informed by the inclusion of a Spatial Framework in accordance with SPP Table 1. The Spatial Framework confirms that the area surrounding Dear Reservoir is predominantly in Group 3 of Table 1 Areas with potential for wind farm development. The scattered pockets of land falling into Group 2 of Table 1 are due to the presence of peat and carbon rich soils. This is discussed further below.

## 7.6. Policy IN1 Renewable Energy

Policy IN1 – ‘Renewable Energy’ states:

*“The Council will support development proposals for all renewable energy generation and/or storage which are located, sited and designed appropriately. The acceptability of any Proposed Development will be assessed against the following considerations:*

- *landscape and visual impact;*
- *cumulative impact;*
- *impact on local communities and individual dwellings, including visual impact, residential amenity,*
- *noise and shadow flicker;*
- *the impact on natural and historic environment (including cultural heritage and biodiversity)*
- *the impact on forestry and woodlands;*

*All proposals will be required to provide sufficient detail to aid this assessment, including:*

- *any associated infrastructure requirements including road and grid connections (where subject to planning consent);*
- *environmental and other impacts associated with the construction and operational phases of the*
- *development including details of any visual impact, noise and odour issues;*
- *relevant provisions for the restoration of the site;*
- *the scale of contribution to renewable energy generation targets;*
- *effect on greenhouse gas emissions; and*
- *net economic impact, including local and community socio-economic benefits such as employment,*
- *associated business and supply chain opportunities.”*

The acceptability of the proposal will be:

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

For reasons explained elsewhere in this statement, the Proposed Development is considered to have been designed and sited in an appropriate manner such that it can be supported by the overall objectives of this policy. It is noted that only 5 of the 17 turbines are within Dumfries and Galloway and that in itself reduces the level of direct impacts which require to be considered under this policy. The EIAR notes that receptors close to the Proposed Development (primarily residential receptors and users of the Southern Upland Way) may experience significant effects but that these are limited both in their extent and number. Further afield, it is acknowledged that the Proposed Development will be visible from outside the site boundary including the Thornhill Uplands Regional Scenic Area (RSA) within which the Proposed Development is partly located, the Moffat Hills RSA to the north east

and parts of the town of Moffat. By comparison to the recently determined Harryburn and North Lowther projects which were deemed to have had unacceptable significant adverse impacts on the historic villages of Wanlockhead (in D&G) and Leadhills (in South Lanarkshire), the design of the Proposed Development is such that it is only visible from the eastern side of Moffat and does not have a significant adverse effect on its historic core. It is further noted in the preamble to this policy that the need for energy storage is becoming increasingly important at both domestic and commercial levels. The inclusion of storage facilities within the Proposed Development is also therefore supported by the DGLDP2. Sufficient detail has been provided in the EIAR to enable compliance with the second part of this policy and the detailed findings of the EIAR would point towards the balance between benefits and impacts required under this policy concluding in favour of the Proposed Development.

## 7.7. Policy IN2 – Wind Energy

The Proposed Development also falls within DGLDP2 Policy IN2: Wind Energy which has also been used to consider the potential impacts of the Proposed Development on the D&G area. This policy indicates support for development where it can be accommodated without unacceptable significant adverse effects and cross references other relevant policies.

As with IN1, this policy is split into two parts. Part 1 states that the acceptability of any proposed wind energy development will be assessed against the following considerations:

### Landscape and Visual Impact

*“The extent to which the landscape is capable of accommodating the development without significant detrimental landscape or visual impacts, including effects on wild land; and  
That the design and scale of the proposal is appropriate to the scale and character of its setting, respecting the main features of the site and the wider environment and that it addresses fully the potential for mitigation.”*

Again, the matters raised above require to be considered in two ways. Firstly, the direct impacts and effects arising from turbines and other infrastructure located within Dumfries and Galloway and also the indirect effects of the turbines in South Lanarkshire. These matters were fully considered during the design of the Proposed Development as set out in section 3 of this statement and Chapter 2 of the EIAR, whilst the resulting impacts and effects have been assessed in Chapter 5 of the EIAR. As a consequence of both, it is possible to conclude that although there are some significant landscape and visual impacts which will inevitably be experienced within the immediate surrounds of the Proposed Development, the design and scale of the Proposed Development is appropriate to the scale and character of its setting. The main features of the wider environment have been adequately considered and, where possible, impacts mitigated through design and that the overall impact of the Proposed Development is appropriate and therefore acceptable on balance.

### Cumulative Impact

*“The extent of any detrimental landscape and visual impact from two or more energy developments and the potential for mitigation”.*

The siting and design of the Proposed Development has also given particular consideration to the potential cumulative impacts, notably with Harestanes in Dumfries & Galloway and Clyde in South Lanarkshire. By maintaining a gap similar to the gaps between the component parts of the Clyde Wind Farm whilst working with the inherent landscape character and topography of the site, the extent of potentially significant effects which might otherwise have arisen, have been reduced through mitigation.

### Impact on Local Communities

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

The potential impact on Moffat as the nearest community to the Proposed Development has been considered and deemed to be acceptable in terms of noise, visual dominance and shadow flicker as a result of the siting and design, distance and intervening topography.

### Impact on infrastructure



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

Being located close to the M74 the potential impact on local roads has been minimised with any residual impacts being addressed through the commitment to implement a Traffic Management Plan, see EIAR Chapter 11.

### **Impact on Aviation and Defence Interests**

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

The Proposed Development sits within the Eskdalemuir Safeguarding Area and is being addressed through the proper channels by the Applicant. The potential effects of the Proposed Development on aviation have been mitigated by the inclusion of aviation warning lights on some of the turbines. The effects of these have in turn been mitigated by a reduced lighting scheme which has been agreed with CAA.

### **Other Impacts and Considerations**

*“The extent to which the proposal avoids or adequately resolves any other significant adverse impact including:- on the natural and historic environment, cultural heritage, biodiversity; forest and woodlands; and tourism and recreational interests.*

*The extent to which the proposal addresses any physical site constraints and appropriate provision for decommissioning and restoration.”*

The potential impacts of the Proposed Development on ‘other considerations’ have been addressed through careful siting and design and the inclusion of appropriate mitigation measures which can be secured by appropriately worded planning conditions.

The acceptability of a development proposal will be:

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

The DGLDP2 seeks to develop its renewables sector to help support growth in the Dumfries and Galloway area, aligning its renewable energy policy with SPP. The DGLDP2 also recognises the importance of the renewable energy sector and its contribution to the economy.

Part 2 of Policy IN2 - Wind Energy states that wind energy developments will be supported when appropriately sited and are of the right design. Wind farm developments should also take into account the spatial framework provided within the plan, which outlines appropriate locations.

Policy IN2 is phrased in a similar way and covers a similar range of topics such that it is possible to draw similar conclusions to those under IN1. It is the Applicant’s view that the efforts to ensure that this project is appropriately sited and of the right design alongside the alignment with the SPP discussed in Section 6 of this statement are such that this application can be supported under this policy.

## **7.8. Other LDP Policies**

The DGLDP2 contains other policies relevant to the Proposed Development which have the overarching aim to encourage prosperous and sustainable communities and businesses, balance with protecting and improving the quality of the environment. These are listed below:

- NE2 – Regional Scenic Areas
- NE6 – Forestry and Woodland
- NE7 – Trees and Development
- T1 – Transport Infrastructure

Of these policies the one of greatest relevance to the proposed development is NE2 Regional Scenic Areas. Part of the Proposed Development sits within the outer edges of the Thornhill Uplands RSA and is visible from parts of the Moffat Hills RSA. Chapter 5 of the EIAR addresses the issues raised and concludes that whilst some locally significant effects on the Thornhill Uplands RSA would be experienced within the immediate vicinity of the turbines,

the siting and design of the Proposed Development is such that this would reduce to a non-significant level of effect over the designation as a whole. No significant landscape effects are considered to occur at Moffat Hills RSA due in part to the limited theoretical visibility predicted, screening from landform and woodland, and distance from the Proposed Development.

In terms of those policies which are more directly relevant to the Proposed Development, the treatment of forestry surrounding the access track is such that it is considered to be aligned with NE6 and NE7. These matters are covered in Chapter 12 of the EIAR. Access onto the public road network and subsequently the M74 is also deemed to be acceptable under T1. These matters are covered in Chapter 11 of the EIAR.

Overall, it is considered that through careful siting and design the Proposed Development has addressed the principal requirements of the DGLDP2 in relation to both the direct effects and impacts of the Proposed Development which is within the region as well as the wider landscape and visual effects which arise from the turbines. Having found there to be an overall level of alignment with the aims of DGLDP2 and, furthermore, concluded that the balance to be struck between the principal policies of the DGLDP2 have been met and that there was no overall conflict with the other relevant policies in the plan, then it has also been concluded that the Proposed Development is sufficiently aligned with the DGLDP2 to support an approval.

## 7.9. Dumfries and Galloway LDP2 Wind Energy Development Management Considerations Supplementary Guidance February 2020

The purpose of this Statutory Guidance (SG) is to provide further detail in support of Policy IN2 assessed in 7.7 of this statement. The Dumfries and Galloway Wind Farm Capacity Study (DGWLCS) is attached as an appendix to the SG. Section 1.3 of the SG notes that the purpose of the DGWLCS is to provide advice and does not to replace the need to assess the impacts of a proposal. The EIAR which accompanies this application has considered where relevant the various detailed considerations outlined in this SG and having concluded a 'Not significant' response for all but one of the topics considered, is deemed to be generally aligned with this guidance.

The only area where significant effects were predicted is in the landscape and visual chapter of the EIAR. The level and nature of effects are however noted as being expected for a development of this scale in this location. It is also noted that due to careful siting and design of the Proposed Development relative to the surrounding landscape, topography and the natural screening that this provides, the extent of these significant effects is limited. Impacts on local designations are also limited and not significant. Overall, therefore the Proposed Development is deemed to have adequately considered the content of this guidance in its design and layout and that this is reflected in the results of the EIAR.

It is noted above that the DGWLCS is attached as an appendix to the SG. Map 5 and table in the SG provide a useful summary of the DGWLCS advice on the use of 'Very Large' typology turbines. These references confirm the Council's view that the area around Dear where the Proposed Development is located is a High-Medium Sensitivity to the size of turbines proposed at Dear.

Whilst the appendix updates the previous 2017 version of the DGWLCS in a series of minor text changes listed outline at the start of the document, the document, its methodology and its findings remain relatively unchanged from the earlier version. In particular the DGWLCS is still a 'Capacity Study' in name and continues to seek to impose limits on turbine size and location in a prejudicial manner. This is now clearly at odds with the approach to landscape planning which is now promoted by NatureScot and which has been discussed at length in numerous Public Inquiries and has hitherto been discussed in relation to the South Lanarkshire guidance.

Whilst the DGWLCS notes that in the opinion of the authors there is no scope for turbines over 50 m in the Southern Uplands Landscape, the Applicant would wish to revert back to the purpose of this appendix as stated in the SG. That is to provide advice and not to replace the need for detailed assessment. Furthermore, in the views of NatureScot the lack of any regionally agreed targets means this document is unable to advise with any authority on the capacity to accommodate development which has not been defined. Instead based on the suggested proper use of this as a sensitivity study, the relative sensitivities of the landscape surrounding the Proposed Development have been taken into account in the design of the Proposed Development and that the success of the design process is reflected in the limited extent of significant effects identified. Overall whilst the appendix to the SG presents a number of inherent conflicts between its advice and the priorities of the Scottish Government to

meet its Climate change objectives and also more recent changes to the SPP, the Applicant has taken on board the general requirements of the SG in so far as it is practical to do so and from that can claim a reasonable and practical level of compliance with this document.

## 7.10. Development Plan Conclusions

The Proposed Development is well aligned with the strategic elements of the development plan in both local authority areas. This strategic element in itself aligns with the general requirements of national planning energy and climate change policy. At a more detailed level the Proposed Development aligns well with the general balancing requirements of both development plans in terms of environmental effects. The only area where there is a direct conflict is in the detailed guidance provided by South Lanarkshire which stipulates an artificial buffer zone around existing wind farms and in the Guidance of Dumfries and Galloway Council which seeks to prevent wind turbine development above 50 m in height. This buffer and this level of prejudicial restriction has no locus in national policy and is completely at odds with SPP 163 which states that, in the context of development plan preparation, “additional constraints should not be applied” and that the “spatial framework is complemented by a more detailed and exacting development management process...”. As the approach taken in the guidance of both Local Authorities represents an additional constraint that does not facilitate and support sustainable development, this guidance can be given limited weight in the decision-making process. Instead, weight should be given to the alignment of the Proposed Development and the Development Plan more generally with national and strategic policy and legislation, the actual suitability of the site for wind farm development, the design response and the detailed findings of the EIAR. Taken together and having regard to the need to apply the planning balance, it is the Applicant’s view that the Proposed Development is sufficiently supported by the development plans of both local authorities to warrant a positive response.

## 8. Summary and Conclusions

The development of the Daer Wind Farm dates back over 12 years and straddles several changes to legislation, regulations, national and local policy and support mechanisms. The one constant throughout that period has been the suitability of the physical attributes of the Daer reservoir site to accommodate a commercial scale wind farm. This includes:

- The availability of suitable wind resource both in terms of speed and quality (this having been established through years of onsite monitoring and modelling);
- The lack of any significant physical onsite constraints to development;
- Lack of any onsite national natural or cultural heritage designations;
- Land which is owned by Scottish Water which itself has been tasked by Scottish Ministers with generating more renewable electricity from its own assets and land holdings;
- Land which has already been used to store, treat and supply water on a utility scale for over 60 years;
- Proximity to and availability of good grid and transport links along the M74 corridor.

During this time and especially over the last few years the needs case and support for commercially viable renewable energy projects such as this has increased immeasurably. Notable amongst this support has been the SES and OWPS in 2017 and the CCC ‘Net Zero’ Report, the Scottish Government’s declaration of a Climate Emergency and Climate Change (Emissions Reduction Targets) (Scotland) Act in 2019. All of these have highlighted the pressing legal need for a major shift in policy and practice to meet increasingly demanding targets for renewable energy generation in Scotland. Whilst a succession of delays to the NPF4 timetable have meant that these have still to be reflected in Scottish planning policy, it is clear from recent publications such as the CCC progress report in October 2020 and the NPF4 position paper at the end of 2020 that the need for, and the commitment to, implement this alignment is now a matter of when rather than if.

Despite the very clear and obvious need for a policy shift to enable substantially more renewable energy generation to come on stream and facilitate the transition to Net Zero in order to meet legally binding climate change targets, the planning policy response at the local level has failed to keep pace and, in some elements, has

gone in the opposite direction. Areas such as the land at Daer Reservoir which are potentially suitable for wind energy development, in line with the SPP, Clyde Plan, SLLDP and DGLDP2 Spatial Frameworks, and capable of accommodating (as demonstrated through the EIA process) the scale of development necessary to meet national targets have been artificially constrained by out of date and overly prescriptive local planning guidance. Given the age and lack of relevance of this planning guidance to the current and emerging national and international position on renewable energy, climate change and sustainable development, in line with the SPP it should be afforded limited weight in the assessment of this application. Instead, attention should be focussed on the outcome of the EIA and presumption in favour of sustainable development which has been arrived at having regard to the requirements of this broader policy position.

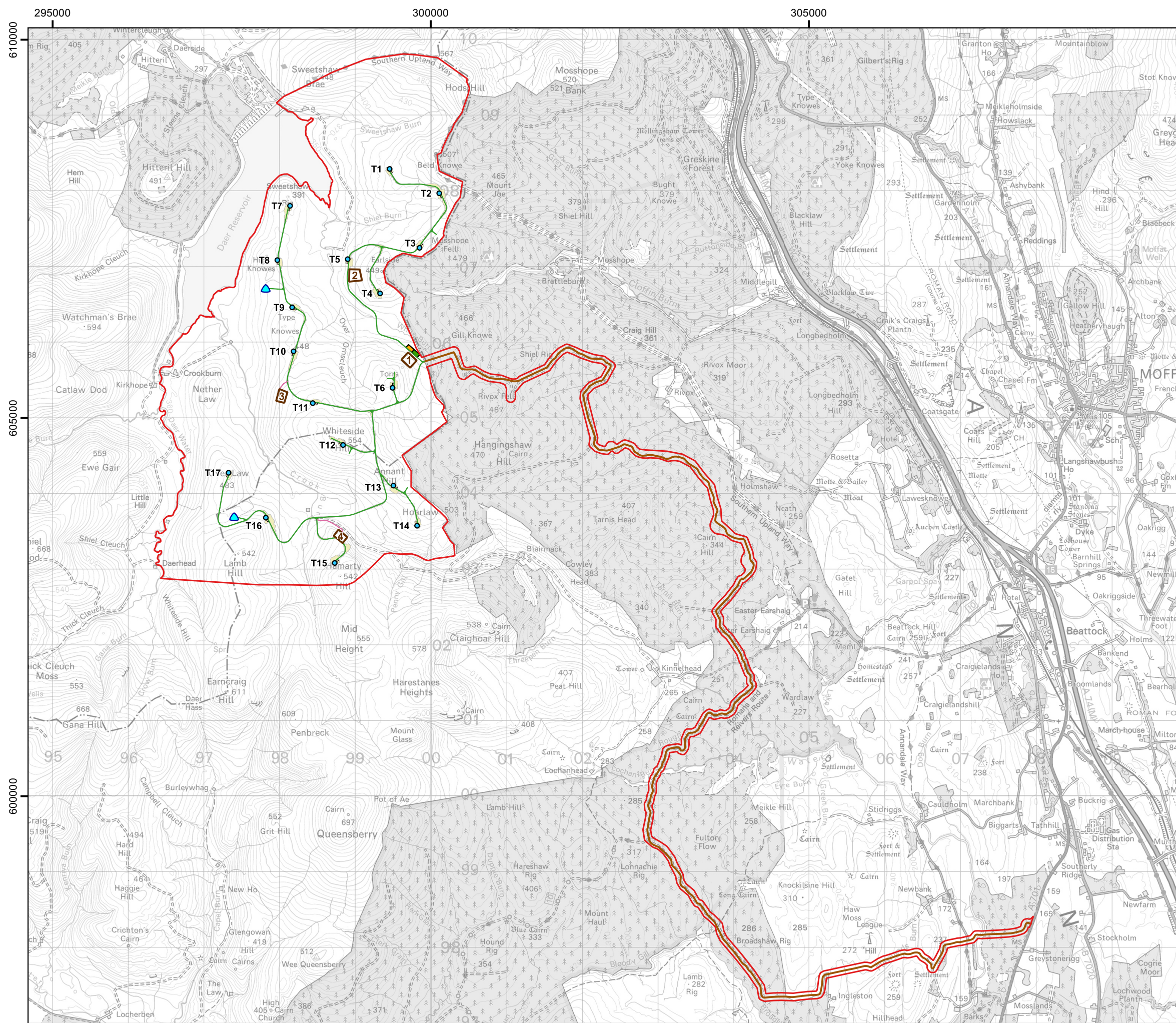
The outcome of this is a development which:

- will generate approximately 100 MW of renewable power making a notable contribution to current renewable energy targets and climate change/carbon emissions reduction targets;
- will advance the nationally endorsed Strategic Plan for generation of renewable electricity on Scottish Water land;
- will provide direct employment in a rural part of south west Scotland which has limited employment opportunities;
- will provide contracts for local businesses during the construction, operation and decommissioning phases;
- will provide community benefit funding to assist local communities to undertake their own green recovery and meet their own local net zero targets in line with local economic strategies;
- will include funding to enhance the SUW thereby improving and maintaining existing recreational access in the surrounding area;
- will provide significant business rates payable to both LPAs;
- will provide rental payments to landowners in a rural economy setting;
- will provide opportunities and the investment required to enhance the current land and habitat management of site including peat restoration in line with Scottish Government objectives;
  - will do so for up to 35 years and in so doing continue to make a notable contribution to targets beyond the 2045 net zero target date;
  - will do so aligned with the principle of Biodiversity Net Gain.
  - will do so in an area which is recognised at a national and strategic level as being in a Group 3 area with potential for wind farm development and having been shown through siting, design and mitigation to have substantially overcome the reasons why some parts of the site were in Group 2 areas;
- will, as a result of a detailed siting and design process, do so with no significant effects on all but one of the topics assessed in the EIAR and with opportunities to enhance the current land and habitat management of site; and
- having had regard to topography of the site and its surroundings can be developed with limited significant landscape and visual impacts relative to other infrastructure including already consented and operational wind farms in the surrounding area.

For these reasons and on the basis of the overall balance of planning and other policy in favour of the Proposed Development it is requested that this application be approved.

## Appendix 1

- Figure 1.1: Site Layout  
Ref: GB200492\_M\_052\_G



Project:  
**Daer Wind Farm, South Lanarkshire/Dumfries & Galloway**

Title:  
**Figure 1.1: Site Layout**

- Key**
- ▭ Site boundary
  - Proposed turbine \*
  - ▲ Proposed permanent anemometry mast
  - ▭ Proposed crane hardstanding
  - Proposed permanent track
  - Proposed temporary track
  - Proposed access from public road
  - ▭ Proposed indicative areas of cut/fill earthworks
  - ▭ Proposed temporary construction compound
  - ▭ Proposed substation, control building, energy storage & compound
  - ▭ Proposed borrow pit search area

Turbine	Easting	Northing
1	299455	608292
2	300111	607970
3	299851	607249
4	299329	606646
5	298901	607099
6	299494	605398
7	298138	607804
8	297970	607086
9	298166	606462
10	298185	605881
11	298439	605196
12	298839	604642
13	299505	604105
14	299818	603575
15	298729	603082
16	297818	603681
17	297325	604275

\* Maximum turbine dimensions - HH: 102.5, RD: 155, TH: 180.  
 Candidate turbine model - SG 155 6.6 MW.

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Scale @ A3: 1:50,000  
 Coordinate System: British National Grid

Date: 26-01-21    Prepared by: DH    Checked by: GS  
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