



Supporting Document

Woolfords Wind Farm - Tip Height Increase

Planning Statement

Woolfords Wind Energy Ltd

wind2

your project our expertise

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Document Prepared For

Ewan Eley

Woolfords Wind Energy Ltd

Document Prepared By

Jyotika Shah

Consultant

planning@atmosconsulting.com

Document Approved By

Malcolm Sangster

Technical Director

planning@atmosconsulting.com

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Glossary of Terms

Term	Definition
The Applicant	Woolfords Wind Energy Ltd
Environmental and Planning Consultant	Atmos Consulting Limited
Environmental Appraisal	Environmental Appraisal is a means of carrying out, in a systematic way, an assessment of the likely significant environmental effects from a development.
The Consented Development	Woolfords Wind Farm (Planning Reference: P/22/0031 & Date of Consent: 30 May 2025)
The Proposed Development	Woolfords Wind Farm
The Site	The site of the Proposed Development outlined in red. This is also the application boundary.
The Planning Act	The Town and Country Planning (Scotland) Act 1997 (as amended)

List of Abbreviations

Abbreviation	Description
CCC	Climate Change Committee
CCUS	Carbon Capture Utilisation and Storage
CO ₂	Carbon Dioxide
CEMP	Construction Environmental Management Plan
EA	Environmental Appraisal
GHG	Greenhouse gas
GW	gigawatts
ha	hectares
HMG	Habitat Management Group
HMP	Habitat Management Plan
LDP	Local Development Plan
LVIA	Landscape and Visual Impact Assessment
MW	megawatt
MtCO ₂ e	million tonnes of carbon dioxide equivalent
NDC	Nationally Determined Contributions
NGR	National Grid Reference
NPF4	National Planning Framework 4
NSIP	Nationally Significant Infrastructure Project
NVC	National Vegetation Classification
OHMP	Outline Habitat Management Plan
OWESG	Onshore Wind Energy Supplementary Guidance
OnWPS	Onshore Wind Policy Statement
OWSD	Onshore Wind Sector Deal
RVAA	Residential Visual Amenity Assessment
RVAA	Residential Visual Amenity Assessment
SAC	Special Area of Conservation
SES	Scottish Energy Strategy
SLA	Special Landscape Areas
SLC	South Lanarkshire Council
SPP	Scottish Planning Policy
SSSI	Site of Special Scientific Interest
SuDS	Sustainable Drainage System
UNEP	UN Environment Programme

UNFCCC	United Nations Framework Convention on Climate Change
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1. Introduction

This Planning Statement has been prepared by Atmos Consulting Ltd on behalf of Woolfords Wind Energy Limited (“the Applicant”) in support of a new application for planning permission under the Town and Country Planning (Scotland) Act 1997 (as amended) (the “1997 Act”) for the construction and operation of an electricity generating station known as Woolfords Wind Farm (the “Proposed Development”).

The Proposed Development is located on land approximately 940 m northwest of Woolfords Farm, Woolfords, West Calder, within the administrative area of South Lanarkshire Council (SLC). The application site (the “Site”) lies within an area that has already been established as suitable for wind energy development through the grant of a previous planning permission.

1.1 Background

The planning application in respect of the Woolford Wind Farm (the ‘Consented Development’), consisting of three wind turbines with maximum dimensions of 155m rotor diameter and 180m blade tip height, along with associated infrastructure, was submitted in December 2021, and granted in full by SLC in May 2025 (Reference: P/22/0031).

Through this new application, to increase the maximum tip height to 200m, the Applicant wishes to make minor changes to the Consented Development to provide greater flexibility in choosing the most modern, high-efficiency turbines, best suited to the site and the wind resource.

Since the Consented Development went into planning in 2021, new larger turbine models have become more widely available, whilst some of the previous candidate turbines at smaller tip heights are being phased out of production, limiting the availability of some turbine models.

These and other changes in the market means that the Applicant requires more flexibility to allow for the installation of larger turbines to increase the amount of renewable energy that can be produced from the site and to improve the economic viability of the wind farm.

As per the advice received from SLC on 17th June 2025, an increase to the dimensions of the turbines cannot be permitted through variation of the planning conditions applicable to the Consented Development but requires an entirely new planning permission.

With the exception of some minor alterations to the dimensions of the turbine bases and laydown areas to allow for the larger turbine components, no changes to the civil infrastructure (access tracks, watercourse crossings, access junction etc.) of the Consented Development are proposed.

As a result this Appraisal does not reassess those components as permission has already been granted permitting their construction.

As such, the Proposed Development represents a refinement of an already consented scheme, rather than a fundamentally new proposal.

1.2 The Applicant

The Applicant is Woolfords Wind Energy Ltd, a wholly owned subsidiary of Wind2 Ltd.

Wind2 Limited is an established renewables development company which has consented wind and solar projects across the UK.

1.3 Approach to Planning Statement

In accordance with Section 25 of the 1997 Act, planning decisions must be made in accordance with the Development Plan unless material considerations indicate otherwise.

As per the Planning circular 3/2022 (Scottish Government 2022), the planning history of a site is a material consideration in the determination of a planning application. In this case, the existence of consent for a three-turbine wind farm development indicates that the principle of such development at this location has already been accepted.

This Planning Statement presents an assessment of the Proposed Development against the requirements of the Statutory Development Plan and other relevant guidance.

The Statutory Development Plan comprises:

- The National Planning Framework 4 (NPF4) (Scottish Government, 2023a);
- South Lanarkshire Local Development Plan 2 (South Lanarkshire Council, 2021).

However, it is noted that Section 24 of the Town and Country Planning 1997 Act states that; “(3) *In the event of any incompatibility between a provision of the National Planning Framework and a provision of a local development plan, whichever of them is the later in date is to prevail.*”

This Planning Statement accompanies the Environmental Appraisal (EA) Report submitted in support of the application. The EA Report presents the findings of the assessment process by describing the Proposed Development, the current conditions at the Proposed Development Site and the likely environmental effects which may result from the construction and operation of the Proposed Development.

Where appropriate, mitigation measures designed to avoid, reduce or offset potentially significant effects are proposed and conclusions are presented on residual effects (those effects that are expected to remain following implementation of mitigation measures).

The Planning Statement draws upon the findings of the EA and other supporting information to consider the Proposed Development in the context of the Development Plan and other material considerations.

1.4 Changes to Planning Policy Since the Previous Application

Since the submission of the previous application, there have been significant changes to planning policy at National level. The most notable of these is the adoption of the NPF4, which represents a major shift in planning policy and has an important influence on how the planning balance is now considered for renewable energy proposals.

NPF4 places the climate and nature crises at the heart of decision-making, giving substantial weight to developments that contribute to Scotland’s transition to net zero.

The South Lanarkshire Council’s Local Development Plan 2 was adopted in 2021 and was primarily informed by the then-applicable Scottish Planning Policy. Since that time, the NPF4 has been adopted, placing the climate and nature crises at the heart of planning and strongly supporting renewable energy development.

As NPF4 is the most recent statement of national planning policy, it will prevail over the older Local Development Plan 2 policies where there is an incompatibility, therefore, the Proposed Development should be assessed primarily against NPF4. In this context, the scheme is in accordance with NPF4 provisions for renewable energy, climate action, and sustainable development, ensuring that the benefits of the development are aligned with current national policy priorities.

In particular, NPF4 Policy 11 (Energy) supports the expansion of renewable energy generation and related infrastructure, recognising its essential role in achieving national energy security and emissions reduction targets.

Policy 1 (Tackling the Climate and Nature Crises) establishes that the global climate and nature emergencies are the primary guiding principles for all planning decisions, reinforcing a strong presumption in favour of proposals that support climate change mitigation and adaptation.

The UK Government and Scottish Government declared a Climate Emergency in May and April 2019, respectively. South Lanarkshire Council has also acknowledged the Climate Emergency within September 2019 committee minutes and has indicated a commitment to supporting the transition to net zero, including through the development of relevant strategies and the continued consideration of climate change in decision-making.

These commitments, together with updated national energy policy and the introduction of NPF4, reinforce the increasing urgency of addressing climate change and the need to accelerate the delivery of renewable energy development in support of net zero targets.

These policies are discussed in detail in Sections 6 of this Planning Statement. Collectively, these policies place an increased emphasis on the need for renewable energy generation, highlighting the importance of delivering renewable energy developments in appropriate locations to support the transition to net zero by 2045 and to address the urgent challenges of climate change.

1.5 Application Documents

The Application for the Proposed Development is submitted to the SLC under the Town and Country Planning Act. The Applicant respectfully requests that the SLC, as Planning Authority, grant consent for the Proposed Development.

The Application is supported by the following documents:

- Main EA Report;
- Technical Appendices;
- Figures and Visuals, and
- Planning Statement (this document);

2. The Proposed Development

2.1 Site Context

The location of the Proposed Development is unchanged from the Consented Development which is repeated here for ease of referral.

The Consented/Proposed Development is located approximately 4km northeast of Forth in South Lanarkshire, centred on National Grid Reference (NGR) 299380, 657570 as shown on Figure 3-1: Site Location Plan (the 'Site').

The Site occupies an area of approximately 290 hectares (ha); however, the infrastructure area of the Proposed Development will be substantially less at 27.5ha, as show on Figure 3-2.

The Site is open moorland used for the grazing of sheep and cattle.

The Site itself is not located within any statutory ecological designation. However, several designated ecological sites are located within the wider 10 km study area.

There are three Special Areas of Conservation (SAC) located with in 10k radius of the Site boundary in which the Braehead Moss is the nearest which is 4.7km southwest of the Site boundary. Ther other two are Craigengar (7.3km southeast) and Cranley Moss (9.5km southwest).

Thirteen Sites of Special Scientific Interest (SSSIs) are recorded within 10 km of the Site. These include Cobbinshaw Reservoir (around 400 m to the east), Cobbinshaw Moss (1.4 km east), Skolie Burn (3.6 km north), Hermand Birchwood (3.9 km north-east), and Braehead Moss (4.7 km south-west). Easter Inch Moss and Seafield Law Local Nature Reserve is located approximately 7.3 km to the north.

There are no statutory heritage designations within the Site boundary, such as Scheduled Monuments, Listed Buildings, World Heritage Sites, Inventory Gardens and Designed Landscapes, Inventory Battlefields, or Conservation Areas.

The nearest Scheduled Monument is the West Harwood burial mound, located approximately 1.6 km to the north-east. Another nearby site is Haywood deserted mining village, around 1.9 km to the south-west. In total, 35 Scheduled Monuments are present within 10 km of the Site.

The nearest Conservation Area is Livingston Village, approximately 8.7 km to the north-east.

Two Gardens and Designed Landscapes are located within 10 km of the Site. The closest is Harburn House, around 3.9 km to the north-east, and Little Sparta (Stonypath) lies approximately 9.3 km away.

There are no Listed Buildings within the Site or within 1 km of its boundary. The nearest Category C listed building is North Valve House, located about 2.1 km to the north-east. Auchengray Church, a Category B listed building, lies approximately 2.1 km to the south. The nearest Category A listed building is the West Pavilion at Blackburn House, around 6.9 km to the north. In total, 114 Listed Buildings are recorded within 10 km of the Site.

There are no Core Paths or National Trails within the Site. An aspirational core path (CL/5667/1) lies approximately 260 m to the south-east of the Site boundary. The nearest National Cycle Network route is located around 7.4 km to the north from the site boundary.

The Site is located within a landscape influenced by a number of existing and consented wind farm developments. Since the previous baseline studies were produced, the cumulative wind energy context surrounding the Site has evolved, with a number of wind farm developments now operational and/or consented in the surrounding area. These include Longhill Burn, Pearie Law extension and Heathland Resubmission.

As a result, the Site is now located within a more developed wind energy landscape than previously, with an increased presence of operational and approved turbines in the wider area. This change in cumulative context has been fully reflected in the assessments undertaken as part of this application.

2.2 Description of Proposed Development

The Proposed Development will consist of three wind turbines with current candidate turbine dimensions of 175m rotor diameter and up to 200m blade tip height, an increase of 20m from the Consented Development, along with associated infrastructure including:

- Access tracks (6m running width, unchanged from the Consented Development);
- Turbine foundations (of an area up to 26m x 26m unchanged from the Consented Development);
- Altered Crane hardstandings (up to 58m x 30m as opposed to 40m by 35m permitted as part of the Consented Development);
- A combined Substation and control building (20m x 4m unchanged from the Consented Development);
- A temporary construction compound (10m x 50m unchanged from the Consented Development); and
- An area of borrow pit search is also proposed, again unchanged from the Consented Development.

The Proposed Development will have a combined maximum rated output of approximately 20MW. The permanent and temporary infrastructure is shown in Figure 2: Site Layout.

The Proposed Development has been designed to have an operational life of 40 years at the end of which it would be decommissioned.

Following expiry of planning permission, the decommissioned above ground infrastructure would be removed and reinstated in an environmentally sensitive way, as agreed with statutory consultees. The above ground infrastructure is permanent only for the duration of the planning permission. Decommissioning would follow best practice pertaining at the time.

It is requested that the precise locations of the proposed wind turbines and other infrastructure may be micrositied within 25m from the locations shown on Figure 2: Site Layout. This micrositing is requested in order to allow a degree of flexibility to take into account localised ground conditions and other environmental constraints which may be identified during post consent survey works. A planning condition confirming this arrangement is requested.

2.3 Site Selection

The location of the Proposed Development has not changed and was selected based on its proven suitability for wind energy generation, as established for the Consented Scheme in 2021. The site remains suitable for the following reasons:

- The availability of grid capacity and a viable point of connection remains unchanged from the original 2021 assessment;

- The size, orientation and topography of the Site continue to provide suitable conditions for wind energy generation, with the Proposed Development making use of these same characteristics to accommodate modern turbine technology;
- The land remains subject to agreement with willing landowners who supported the Consented Development;
- The Site was originally selected to avoid significant national and local environmental designations, including landscape, ecological and cultural heritage constraints, and the Proposed Development remains consistent with these spatial considerations; and
- The proposed changes do not materially alter land-use characteristics or the effects previously identified in relation to the consented scheme.

2.4 Design Principles

The design principles of the Proposed Development carry forward the exact principles applied to the Consented Development, ensuring a design that maximises renewable energy output while minimising environmental effects.

- The use of increased turbine tip height (up to 200 m) to improve energy yield and carbon displacement within the same development footprint;
- Continued avoidance of areas of high sensitivity peatland, with permanent infrastructure located primarily on mineral soils or shallow peat, in line with the consented design approach and NatureScot good practice guidance; and
- Maintenance of appropriate separation distances to sensitive receptors, with the design continuing to follow the established approach to minimising potential effects.

2.5 Design Evolution

The Proposed Development represents an evolution of the consented scheme rather than a fundamental redesign of the Site layout. The consented design, developed in 2021, involved a series of refinements to the initial layout to respond to site constraints, including the avoidance of tree belts, heritage assets and other environmental sensitivities, as well as optimisation of access arrangements and visibility splays.

Building on this established design, the Proposed Development has been revisited to reflect the availability of modern turbine technology with an increased tip height of up to 200 m. This has involved a review of the consented footprint to ensure that the larger turbine components can be accommodated while retaining the overall spatial structure and key principles of the approved layout.

Mapping and technical review confirm that the locations of the main infrastructure elements remain consistent with those approved under the consented scheme. Any changes are minor in nature and are primarily limited to localised adjustments associated with turbine foundations and construction laydown areas required to facilitate the updated turbine specifications.

The review also confirms that permanent infrastructure continues to avoid areas of deep peat, consistent with the approach adopted for the consented development. Where temporary interaction with such areas may occur during construction, these effects are localised, short-term in nature, and capable of full restoration following completion of works.

3. Benefits of the Proposed Development

3.1 Energy Generation and Carbon Savings

The Proposed Development is a direct response to the global climate emergency and is designed to meet the decarbonization targets set by the Scottish and UK Governments.

From the data gathered to date from the onsite meteorological mast the Proposed Development will generate an estimated 65,353 MWh of renewable electricity per year, an 18% uplift from the output figures for the consented project. This annual output is equivalent to the electricity required to power approximately 16,715 households in Scotland¹, demonstrating the high yield potential and technical efficiency of the 200m turbine height.

The Proposed Development makes a valuable contribution to the attainment of UK and Scottish Government policies for encouraging renewable energy, specifically supporting Scotland's statutory target of Net Zero by 2045 and the UK-wide target of 2050.

In line with NPF4, onshore wind is recognized as a fundamental component of the energy response to the climate crisis. By optimizing the turbine height at this established location, the project ensures a significant increase in renewable energy production from a very similar compact footprint.

The environmental value of the Proposed Development is further evidenced by its capacity to displace fossil fuel-reliant generation, resulting in an estimated reduction in greenhouse gas (GHG) emissions totalling 22,977 tonnes² of carbon dioxide equivalent per annum or 919,080 tonnes over its 40 year operational lifetime.

Furthermore, in accordance with the UK Government's Clean Power 2030 Action Plan, the project addresses the national requirement to accelerate the implementation of low-carbon generation to improve security of supply and affordability.

By generating more low-carbon power from renewable resources, the Proposed Development contributes to a dependable generation mix, reducing reliance on imported fossil fuels and enhancing grid stability.

3.2 Socio-Economic Benefits

The Proposed Development represents a new and substantial capital investment, whilst supporting the area's green credentials, supporting local business through supply chain opportunities, creating jobs and offering skills development as well as supporting the drive for high value sector growth, increasing wages and reducing the migration of young people.

In Accordance with NPF 4 Policy 11(c) which supports development where it maximises net economic impact, the Proposed Development adds to the diversification of the economy towards the renewable sector, which is a higher value sector, and reducing the over-dependence on primary sectors and the seasonal tourism economy.

It is estimated that the following benefits could arise as a result of the Proposed Development:

¹ According to the Scottish Government's Renewable Energy Output Calculator. NB this calculator has not been updated since 2021.

² According to the Scottish Government's Renewable Energy Output Calculator with Fuel Type Displaced = Grid Mix. NB this calculator has not been updated since 2021.

- Pre-construction development investment in legal, planning and grid contracts including planning fees, benefitting a range of Scottish-based companies and organisations;
During construction will be the opportunity for local businesses to support in terms of balance of plant, logistics, groundworks, landscaping, civil engineering, and construction contracts.
In the operational period there will be ongoing contracts for turbine maintenance and groundworks

Community Benefits

Community benefits are not a material planning consideration; however, it does offer a valuable opportunity for local communities to share in the benefits of renewable energy and build lasting relationships that support Scotland's transition to a low-carbon future.

Renewable energy in Scotland offers communities a unique chance to benefit from local resources. The Proposed Development aligns with national guidance, aiming to provide community benefits in line with recommended rates.

The intended community benefit package for the Proposed Development includes a community benefit fund in line with Scottish Government's good practice guidance (Scottish Government, 2019).

Income streams from this community benefits package would provide long term revenue to support local community initiatives. Depending on the initiatives and projects brought forward by the local communities, these could provide positive benefits to the local economy, local facilities and the general quality of life for local residents.

The Applicant proposed to commit to a Community Benefit Fund of £5,000 per MW of installed wind turbine generation output per annum (index linked), throughout the operational lifetime of the Proposed Development. Based on a Site maximum generating capacity of 20 MW and an operational period of 40 years this is equivalent to approximately £4 million of community investment, or £100,000 per annum (in 2026 prices).

The benefits associated with the Proposed Development could go beyond supporting economic activity and employment during the construction and operational phases. In particular, community benefits through a substantial annual community benefit funding arrangement, which would provide a stream of income for the local community to be reinvested and deliver against its priorities and ambitions.

3.3 Habitat Management and Biodiversity Enhancement

No significant effects were found through the assessment of the Proposed Development on sensitive ecology and ornithology receptors as presented in Section 6: Ecology and Ornithology Assessments in the EA Report,

There is a statutory duty to protect certain features (e.g., Priority Peatlands) and a policy requirement to 'conserve, enhance and restore' such features under NPF4 Policy 3 and provide 'significant biodiversity enhancement' which is separate from mitigation under NPF4 Policy 3.

Accordingly, the Outline Habitat Management Plan (OHMP) has been revised to focus on site-specific restoration and the establishment of a Habitat Management Group (HMG) for the scheme.

A restoration programme of existing degraded blanket bog in the north of the Proposed Development Site, an area of up to 14.6 ha, will be implemented to compensate for losses and enhance the Site as per NPF4 requirements.

Restoration will be achieved through ditch blocking using peat and artificial dams, backfilling, and peat waves to encourage re-wetting and restore the carbon-sequestering capabilities of the peatland.

Areas of agriculturally improved grassland will be enhanced to support wader species, specifically for lapwing, curlew, and snipe, through the creation of scrapes, splash pools, and the management of vegetation height.

A Habitat Management Group will be established to provide oversight and a peer review mechanism to refine the implementation of the plan.

Monitoring will be undertaken in Years 1, 3, and 5 of operation, using fixed-point photography and quadrat monitoring to verify that an enhancement and significant biodiversity net gain is achieved.

4. Planning Policy Assessment

4.1 Climate Change and Energy Policy

Climate change has been described as the greatest environmental challenge facing the world today, with the Scottish Government's declaration of the global climate emergency in April 2019 and continued publicity around increasing devastating global climate events linked to climate change to date.

The burning of fossil fuels to produce electricity is a major contributor to climate change through the release of atmospheric carbon dioxide (CO₂) and other harmful gases known collectively as GHGs. As part of the response to climate change, the UK Government has entered into binding international agreements and the Scottish Government has made national commitments to reducing GHG emissions.

The generation of electricity from renewable energy sources is one of the principal ways in which the Scottish Government targets to reduce GHG emissions are to be met within the current policy framework.

The following sections set out key UK and Scottish policies and commitments that are central to the requirement for the Proposed Development.

4.2 The Climate Emergency

The UK Parliament, Scottish Parliament and the Scottish Government have declared a Climate Emergency. While there is no formal obligation to act associated with this status it does emphasise a public and political desire to increase the effort to combat climate change and may result in climate change targets being brought forward.

In a speech to the Scottish Parliament on 14 May 2019, the Climate Change Secretary stated:

"The Climate Change Committee has been stark in saying that the proposed new targets will require a fundamental change from the current piecemeal approach that focuses on specific actions in some sectors to an explicitly economy wide approach. To deliver the transformational change that is required, we need structural changes across the board: to our planning, procurement, and financial policies, processes and assessments. And as I've already said, that is exactly what we will do."

The Climate Change Secretary went on to say that:

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

The speech to parliament highlighted the advice received by the Scottish Government from the UK Climate Change Committee (CCC), emphasising that this advice was being taken forward via amendments to the Climate Change Bill.

In September 2019, South Lanarkshire Council recognised the urgent need to address and mitigate the impacts of climate change at a local level. The Council agreed to review its climate change actions and adjust timescales in response to the increasing urgency of the climate challenge, with the aim of meeting or exceeding national targets for Scotland.

As part of this approach, the Council strengthened its governance arrangements for climate change and sustainability, including working more closely with key partners such as community planning bodies, businesses, the third sector and local communities to help accelerate local climate action.

4.3 International Policy

Paris Agreement

The Paris Agreement (United Nations Framework Convention on Climate Change (UNFCCC, 2015) is a legally binding agreement signed by 196 parties in 2015 at COP21 in Paris with an overarching goal to hold the increase in the global average temperature to well below 2°C above pre-industrial levels and to pursue efforts to limit the temperature increase to 1.5°C above pre-industrial levels.

It required signatories to submit climate action plans (termed Nationally Determined Contributions (NDCs)) on a five-year cycle with the next submission due in 2025.

The UK Government's commitment under the Paris Agreement links to the Climate Change Committee's ('CCC') advice to both the UK and Scottish Governments on 'net zero' targets which have now, at both the UK and Scottish levels, been translated into new legislative provisions and targets for both 2045 (Scotland) and 2050 (UK).

UN Emissions Gap Report

The UN Emissions Gap Report (UN Environment Programme (UNEP, 2025) is the sixteenth Emissions Gap Report produced by the UNEP finds that global warming projections over this century, based on full implementation of Nationally Determined Contributions (NDCs), are now 2.3-2.5°C, while those based on current policies are 2.8°C. This compares to 2.6-2.8°C and 3.1°C in last year's report.

Reductions to annual emissions of 35% and 55%, compared with 2019 levels, are needed in 2035 to align with the Paris Agreement 2°C and 1.5°C pathways, respectively. Given the size of the cuts needed, the short time available to deliver them and a challenging political climate, a higher exceedance of 1.5°C will happen, very likely within the next decade.

Identifying that the power sector (i.e. electricity production) continues to be the largest global contributor overall carbon emissions, the report states that increased deployment of solar and wind generation offers the largest proportion of emission reduction potential across all sectors.

4.4 United Kingdom Energy & Climate Change Policy

Through the Climate Change Act 2008 (as amended in 2019) (UK Government, 2008) the UK Government has set a legally binding target on the Secretary of State: "to ensure that the net UK carbon account for the year 2050 is at least 100% lower than the 1990 baseline". The Act established the CCC to advise the UK Government and report to the UK Parliament on the progress in reducing emissions.

Through the Climate Change Act 2008 (as amended in 2019) (UK Government, 2008) the UK Government has set a legally binding target on the Secretary of State:

"to ensure that the net UK carbon account for the year 2050 is at least 100% lower than the 1990 baseline".

The CCC presents recommendations to the UK Government to set legally binding caps on the maximum level of emissions through a series of carbon budgets 12 years in advance each requiring a progressively higher carbon emission reduction target relative to 1990 levels.

Sixth Carbon Budget

In 2020, the UK Government set the sixth Carbon Budget (CB6). It covers the years 2033-2037 (UK Government, 2021) and sets the budget at 965 million tonnes of carbon dioxide equivalent (MtCO₂e). This requires a reduction in UK GHG emissions of 78% by 2035 relative to 1990, or a 63% reduction from 2019.

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

- UK climate targets cannot be met without strong policy action in Scotland;
- The CCC has established a 'Balanced Pathway' to Net Zero in 2050 requiring the largest reduction in emissions to be achieved in 15 years (from 2020) and a fully decarbonised grid by 2035. It also expects electricity demand to rise 50% by 2035 and to double or even treble by 2050 (CCC, 2020); and
- The CB6 needs to be met and that will need more and faster deployment of renewable energy developments than has happened in the past.

Following the CB6, the UK Government announced on 20 April 2021 that it would set the world's most ambitious climate change target into law (by the Carbon Budget Order 2021 (The Order)) to reduce emissions by 78% by 2035 compared to 1990 levels. This effectively brings forward the UK's previous commitment of an 80% reduction by 2050 by 15 years.

Progress in Reducing Emissions 2025 Report to Parliament

In June 2025, the CCC produced a report to the UK Parliament on the progress made towards meeting the UK's Climate goals (CCC, 2025c).

The report states that;

"Emissions in the UK have been steadily decreasing, with levels in 2024 50.4% below those in 1990... The emissions reduction in 2024 was driven by the electricity supply and industry sectors, with the UK's last coal-fired electricity power station, Ratcliffe-on-Soar, closing in October 2024."

However:

"Future progress will require a broader change, especially using low-carbon electricity to replace oil and gas in surface transport, heat in buildings, and industry, alongside nature-based solutions such as tree planting, and engineered removals."

It identifies that:

"There have been some encouraging signs of progress in our delivery indicators in the last year, with material year-on-year increases in roll-out rates of low-carbon technologies and nature-based solutions. Despite this, some key indicators remain off track. A significant increase in roll-out rates is needed in many areas in the next few years to achieve the UK's 2030 NDC."

Regarding renewable energy generation, it states that:

"total roll-out of offshore and onshore wind and solar capacity increased in 2024 by more than the increase seen in any of the previous six years. To achieve the Government's ambition in the Clean Power 2030 Action Plan, total operational capacity of renewables will need to more than double by 2030."

The report states that regarding onshore wind this will:

“require a tripling in annual installations....compared to the average rate seen since the start of this decade.”

Seventh Carbon Budget – Advice for the UK Government

In February 2025, the CCC published its advice to the UK Government for the seventh Carbon Budget covering the years 2038 to 2045. This is recommending an emissions cap of 535 MtCO₂e.

Under the CCC’s Balanced Pathway to Net Zero, electricity generation is identified as a key route to reaching the budget. According to the CCC, a projected increase in demand due to the electrification of the economy (possibly doubling by 2050 from 2023 levels, a substantial increase in renewable energy generation will be needed.

The CCC’s (2025a) Balanced Pathway therefore requires a doubling of onshore wind capacity to 32 GW is required by 2040. This will require recent annual installation rates:

“...to treble this decade, requiring installation rates comparable to the annual roll-out rates previously sustained during the mid-2010s.”

The values that underpin this pathway require a substantial and immediate increase in capacity in onshore wind rising from 16 GW in 2025 to 26 GW in 2030, 29 GW in 2035, 32 in 2040 and 37 GW in 2050 (see Table 2).

Table 1: Onshore Wind Electricity Generation Capacity Requirements

Year	Capacity in GW
2025	16
2030	26
2035	29
2040	32
2050	37

Clean Power 2030

Clean Power 2030 (UK Government, 2024a) was published in December 2024 with the UK government confirming that delivering clean power by 2030 is at the heart of one of its five missions and Plan for Change. Stating:

“...all routes to a Clean Power system will require mass deployment of offshore wind, onshore wind and solar”

The secretary of state immediately set up a new mission control to drive progress towards the target. In addition to mission control NESO were engaged to provide advice on how to reach the goal. The NESO clean Power Plan stated:

“ There is no path to clean power without mass deployment of offshore wind, together with onshore wind and solar”.

The NESO advice covers all technologies and looks at options for reaching the targets including acknowledging that flexibility may be required:

“For example, onshore wind and solar could substitute for offshore wind”,

The advice also notes the size of the challenge:

“Key supply-side technologies (e.g. offshore wind, onshore wind, solar, batteries) will all need to deploy more on average each year to 2030 than they have ever done in a single year before”.

The Clean Power 2030 Action Plan also notes that:

“There is greater potential to bring new onshore wind and solar projects forward and deliver additional capacity beyond what is already planned by 2030”,

“...clean [electricity] sources produce at least as much power as Great Britain consumes in total over the whole year, and at least 95% of Great Britain’s generation...”

The report is clear that this requires a deployment of onshore wind to 27-29 GW by 2030 exceeding CCC’s recommendation for the Seventh Carbon Budget.

Additionally, the Clean Power 2030 Action Plan emphasises that:

“it is important that government looks at a clean power system beyond 2030, where demand is expected to increase”.

UK Onshore Wind Taskforce Strategy

In July 2025, the UK Government announced the UK Onshore Wind Taskforce Strategy, a direct result of the Clean Power Action Plan, which sets the target for onshore wind capacity. The Strategy aims to double onshore wind capacity to nearly 29 GW by 2030 by removing planning barriers, speeding up grid connections, and fostering community support. It includes 42 actions across areas such as planning, communities, and aviation to overcome deployment blockers and unlock economic benefits.

The Strategy seeks to simplify the planning process for onshore wind, treating it in the same way as other energy developments. It also proposes consulting on bringing large onshore wind projects into the Nationally Significant Infrastructure Project (NSIP) regime to support faster determination.

It places emphasis on building stronger relationships with communities, with an expectation that developers provide community benefits of £5,000 per megawatt per year, unlocking investment for local initiatives. The Strategy also addresses long-running barriers related to aviation and defence, including radar and air traffic control, through collaborative approaches.

4.5 Scottish Energy and Climate Policy

Scottish Energy Strategy (2017)

The Scottish Energy Strategy (SES): The Future of Energy in Scotland (Scottish Government, 2017) was published in December 2017 and presents the Scottish Government’s vision for the future energy system in Scotland. It articulates six energy priorities for a whole-system approach that considers both the use and the supply of energy for heat, power and transport.

Sitting alongside the Climate Change Plan, SES is intended to strengthen the development of local energy, protect and empower consumers, and support Scotland’s climate change ambitions while tackling poor energy provision.

Built around a series of six energy priorities, the SES will guide the decisions that the Scottish Government, working with partner organisations, needs to make over the coming decades.

Specifically in relation to renewable energy generation, this includes the commitment to:

“...continue to champion and explore the potential of Scotland's huge renewable energy resource, and its ability to meet our local and national heat, transport and electricity needs – helping to achieve our ambitious emissions reduction targets”.

For the longer term, the SES states that:

“Scotland's long term climate change targets will require the near complete decarbonisation of our energy system by 2050, with renewable energy meeting a significant share of our needs”

This commitment has been brought forward to 2045 following the Climate Change (Emission Reduction Targets) (Scotland) Act 2019 (UK Government, 2019) and noted in the Scottish Government Energy Position Statement (Scottish Government, 2021).

The SES is clear that onshore wind should continue to play a vital role in decarbonising Scotland's energy systems and confirms the importance of supporting onshore wind development, including the extension and replacement of existing sites with larger turbines, in the right places.

Climate Change (Emission Reduction Targets) (Scotland) Act 2019

Amending the Climate Change (Scotland) Act 2009 (UK Government, 2009), the Climate Change (Emission Reduction Targets) (Scotland) Act 2019 (UK Government, 2019), emphasises the need to deliver renewable energy targets and focuses on giving considerable weighting to the determination of renewable energy proposals (UK Government, 2009a; 2019).

These include wind farm applications in areas where the principle of development has already been established.

The Act strengthens Scotland's climate change targets for the reduction of emission levels from an 80% reduction by 2050 (as set out in the Scottish Government Climate Change (Scotland) Act 2009 (UK Government, 2009), to 100% by 2045. Renewable energy projects, such as the Proposed Development, play a key role in supporting the decarbonisation of the energy sector.

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

The Climate Change (Emissions Reduction Targets) (Scotland) Act 2024 (UK Government, 2024b) received Royal Assent on 22 November 2024. This 2024 Act replaces the annual and interim GHG reduction targets set out in the 2009 Act with carbon budgets, covering 5-year periods between 2026 and 2045 setting the amount of GHG emissions allowed during each period.

Progress in Reducing Emissions in Scotland 2023 Report to Parliament

The July 2024 Climate Change Committee (CCC, 2024b) 'Progress in reducing emissions in Scotland 2023 Report to Parliament' stated that:

“Most delivery indicators are off track, many significantly so... and overall policy progress has been insufficient over the past year”

and;

“Given the pace at which supply chains and investment would need to develop, this rate of reduction is not credible. However, the Scottish Government should build on its high ambition and implement policies that enable the 75% emissions reduction target to be achieved at the earliest date possible.”

As with their advice to the UK Government in respect of the Seventh Carbon Budget, the CCC notes that the growth in onshore wind has slowed and is off track to meet the 2030 budget, meaning that operational capacity will have to more than double to meet the 2030 target.

In acknowledgement of this report, on 18 April 2024, the Scottish Government (Scottish Parliament, 2024) announced that whilst the climate change target to reduce emissions by 75% by 2030 would be removed, the overarching commitment to reach Net Zero by 2045 would remain, stating the intention to;

“...introduce expedited legislation to address matters that the CCC raised and to ensure that our legislative framework better reflects the reality of long-term climate policy making”.

The Scottish Government have stated that the adjustment of the 75% target and introduction of this expedited legislation will allow Scotland to:

“...retain our legal commitment to 2045, alongside annual reporting on progress, while introducing a target approach that is based on five-yearly carbon budgets.”

Onshore Wind Policy Statement (2022)

The Onshore Wind Policy Statement (OnWPS) (Scottish Government, 2022a) was published on 21 December 2022 and outlines the Scottish Government's ambitions for the Onshore Wind Sector, highlighting how these can be delivered. The urgency and relevance of the need to meet Net Zero targets is stressed through the statement that *“We must now go further and faster than before”*.

The OnWPS notes Scotland's current installed onshore capacity of 8.7 GW (as of June 2022) and the aim to maintain a supportive policy and regulatory framework, which will enable an increase in renewable energy deployment and the realisation of the overall ambition of 20 GW of installed onshore wind capacity in the country by 2030.

The OnWPS paves the way for the Onshore Wind Sector Deal (discussed below) as well as offering clarity on achieving balance and maximising benefits in respect of environmental considerations (Chapter 3 of the OnWPS). The sections considered relevant to the Proposed Development are discussed in detail below.

Weight to be Attached to the Climate Emergency

The Ministerial Foreword of the OnWPS 2022 provides important context to the subsequent emergence of the ambition to achieve a minimum of 20 GW onshore wind by 2030. The Cabinet Secretary acknowledges the specific contribution that onshore wind can make to meeting climate change objectives and the transition towards a net zero society.

The Cabinet Secretary's foreword, paragraph two, identifies the issues caused to security of energy supply by the invasion of Ukraine. The Ukraine invasion has resulted in serious concerns about the extent to which Scotland's current energy system can meet demands for energy.

The second aspect raised in respect of the invasion of Ukraine is the consequence for energy prices. This is one of the key contributors to the current cost of living crisis and is counter intuitive when considered in the context of the long-standing policy of providing consumers with affordable energy sources.

The Ministerial Foreword demonstrates how price competitive onshore wind is, paragraph 11 advises that onshore wind is *“good value for consumers”* and it can therefore make a contribution to an energy future which seeks to provide greater price certainty for consumers whilst also providing additional generation which can help to meet the future security of supply.

The Ministerial Foreword states that it is not onshore wind at any cost, paragraph 13 is clear that the ambition needs to be delivered in a way which continues to enhance Scotland's rich natural heritage and native flora and fauna and supports actions to address the nature crisis and the climate crisis.

The OnWPS 2022 sets a specific renewable target which itself relates to the legally binding energy generation targets which are themselves referenced in Policy 11 of NPF4. To date, the focus of the justification for most renewable energy projects has been in relation to climate change and emissions reduction with links made to the legally binding targets which are set out in The Climate Change (Emissions Reduction Targets) (Scotland) Act 2019 (UK Government, 2019). This link is a step change and one which should carry material weight in the decision-making process.

Chapter 1 of the OnWPS 2022 contains specific acknowledgement of the need for the further speedy deployment of onshore wind. It states:

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

As a result of this policy ambition, there is a need for a minimum installed capacity of 20 GW by 2030. If that ambition is to be achieved, consents need to be granted in early course to allow deployment as quickly as possible. Schemes consented now are likely to be delivered in before 2030 and an increase in deployment has to occur now. The Proposed Development if consented, it could actively contribute towards the 2030 targets.

Benefits to Local Communities and Financial Mechanisms

Chapter 4 of the OnWPS 2022 devotes attention to benefits to local communities and financial mechanisms. While neither shared ownership nor the delivery of monetary community benefits are not a material consideration for the determination of the application for planning permission it is important to recognise the benefits which such arrangements bring to the local area.

Peat and Carbon Rich Soils

With 75% of peatland in Scotland in degraded condition, the OnWPS recognises the role of onshore wind in that:

"...the onshore wind sector in Scotland has made remarkable advances over the past decade in mitigation and restoration solutions for peatland..."

The OnWPS goes on to state that:

"The Scottish Government wants to see the onshore wind sector continuing to contribute to peatland restoration as part of development and expects the sector to step up to the challenge of biodiversity loss by showcasing considered schemes that will not just mitigate impact but also improve and enhance our natural environment."

Biodiversity

The OnWPS reiterates the Scottish Government's commitment to tackling the climate and nature crises in tandem.

The OnWPS cites evidence that substantial positive effects for biodiversity from wind farm developments can be achieved and provides examples of best practice in biodiversity enhancement on wind energy development.

Scotland's onshore wind sector can bring many and considerable benefits to rural areas, ranging from the delivery of jobs and investment to the restoration and protection of natural habitats.

Landscape and Visual

As in NPF4, a renewed approach to Landscape and Visual effects is evident in OnWPS, with the acknowledgement that changes to the landscape will occur as taller, more efficient turbines will be required and is explicit that:

"This will change the landscape"

The OnWPS emphasises the Scottish Government's support for:

"...all forms of renewable, low-carbon and zero emission technologies..."

and clarifies that:

"...the only areas where wind energy is not supported are National Park and National Scenic Areas. Outside of these areas, the criteria for assessing proposals have been updated, including stronger weight being afforded to the contribution of the development to the climate emergency, as well as community benefits."

The OnWPS highlights the role "*taller and more efficient turbines*" have to play in meeting this ambition for installed onshore wind capacity, stating:

"Taller turbines have a higher installed capacity which results in the need for fewer turbines per site."

The ongoing technological development in the sector and the availability of larger wind turbines with greater output is recognised in the OnWPS which states Scottish Government support for development of larger (taller) wind turbines in appropriately sited locations, noting that:

"What would previously have been considered "taller" turbines are now more common and must continue to be deployed in appropriate locations."

In respect of Landscape Sensitivity Studies, as strategic appraisals of the relative sensitivity of landscapes to development types or land use changes; the OnWPS is clear that whilst they be a useful tool in assessing specific sensitivities, they should not be used in isolation and replace the need for individual Landscape and Visual Impact Assessments (LVIA).

Conclusion

In its conclusion, the OnWPS is clear that:

"Deployment of onshore wind is mission-critical for meeting our climate targets."

Onshore Wind Sector Deal (2023)

Signed in September 2023, the Onshore Wind Sector Deal (OWSD) sets out the commitments from the Scottish Government and the onshore wind industry to deliver the collective ambition of 20 GW of onshore wind in Scotland by 2030 (Scottish Government, 2023b).

It sets out the Government's commitment to work with developers and stakeholder to understand the operational barriers to delivering onshore wind and set out processes to help remove them.

The Government has a stated commitment to speed up consenting decisions, increase skills and resources in stakeholders and planning authorities; and streamline approaches.

In respect of land use and environment the OWSD restates the need for more wind farms with the safeguards defined in NPF4 as being essential to achieving the 2030 onshore wind ambition.

In planning terms, the OWSD recognises:

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

Draft Energy Strategy and Just Transition Plan (2023)

The Draft Energy Strategy and Just Transition Plan was published on 10 January 2023 (Scottish Government, 2023c). The Scottish Government’s key ambitions for Scotland’s energy future are detailed, as well as; “...proposing a vision for a just energy transition” which provides socioeconomic benefits whilst protecting the environment and providing energy security.

Expanding the energy generation sector is identified as a key ambition, having the stated ambition of:

“More than 20 GW of additional renewable electricity on- and offshore by 2030”

In terms of onshore wind in particular the Strategy state:

“Scotland will embrace the opportunity to increase onshore wind capacity through turbine improvements. Taller and more efficient turbines can be deployed at both new developments and when considering the repowering of existing sites...”

Thereby recognising the need for and importance of larger turbines in the continuing roll out of onshore wind.

Green Industrial Strategy (2024)

The Scottish Government published the Green Industrial Strategy in September 2024 (Scottish Government, 2024) with the mission to:

“...ensure that Scotland realises the maximum possible economic benefit from the opportunities created by the global transition to net zero” (Scottish Government, 2024).

With: “Maximising Scotland’s Wind Economy” identified as one of the five Key Opportunity Areas. The Strategy recognises that: “A thriving onshore wind sector is ... critical to the decarbonisation in Scotland and the UK.”

Programme for Government (2025)

The 2025-26 Programme for Government was published by the Scottish Government in May 2025. It advises that the government will focus on a number of matters including tackling the climate emergency. Chapter 3 of the document advises that

“This Government is working hard to address the twin crises of climate change and nature loss – the devastating consequences of which are playing out at home and abroad, including damaging wildfires and floods witnessed in Scotland recently. It is more important than ever that we embrace and champion the green revolution to improve the lives of current and future generations both here and overseas.

The journey to net zero also presents significant opportunities – for people, communities, and businesses. Between 1990 and 2022 our emissions halved while the economy grew by 66.6%, showing that a thriving economy and falling emissions can be achieved in tandem.”

Scotland's Carbon Budgets- Advice for the Scottish Government (May 2025)

The Climate Change Committee's (CCC) report, Scotland's Carbon Budgets – Advice for the Scottish Government (Scottish Government, 2025b), sets out recommended carbon budgets for Scotland for the period 2026 to 2045.

It advises that emissions should be reduced by 57% by 2030, 69% by 2035, 80% by 2040, and 94% by 2045, compared with 1990 levels. The report concludes that these targets are achievable and that Scotland can reach Net Zero by 2045, provided that action is taken immediately and at the necessary pace and scale.

The CCC explains that most emissions reductions in the first two carbon budgets will come from electrifying key technologies across the economy and reducing demand for high-carbon activities, supported by low-carbon farming, fuels, and carbon capture and storage.

In the later budgets, a greater share of reductions comes from nature-based and engineered removals to address emissions that cannot be eliminated through electrification. The report also notes that immediate actions are required to ensure Scotland can deliver these future reductions.

Electric technologies are identified as the clear low-carbon choice across transport, buildings and much of industry, and can be deployed rapidly with the right incentives. Scaling up these options is central to meeting Scotland's carbon budgets, with electrification providing almost half of the total emissions reduction in the Balanced Pathway.

In this pathway, the capacity of variable renewables in Scotland (including offshore and onshore wind and solar) more than triples from 15 GW in 2023 to 49 GW by 2035, and increases further to 66 GW by 2045. This expansion is projected to provide the majority of Scotland's electricity generation, meeting rising demand both within Scotland and across Great Britain.

Delivering this level of clean electricity requires not only expanded generation but also a strengthened electricity system. The CCC highlights the importance of grid storage, storable fuels across the Great Britain, and smart demand flexibility to maintain a reliable supply even in adverse weather conditions.

Significant upgrades to transmission and distribution networks are also essential, alongside improvements to the planning and consenting process for large electricity infrastructure projects.

Scotland's Draft Climate Change Plan: 2026–2040

This Plan outlines how the country will meet its newly established five-yearly carbon budgets on the pathway to Net Zero by 2045. The latest emissions statistics show that Scotland has already reduced greenhouse gas emissions by 51.3% from 1990 to 2023, with significant progress across electricity supply, industry and waste, driven largely by the transformation of the energy system towards a thriving renewables sector.

In 2023, 70% of Scotland's electricity generation came from renewable sources, and the country remained a major net exporter of electricity to the rest of the UK.

The Plan sets out the policies and proposals required to meet the carbon budgets to 2040, structured around key sectors including buildings, transport, waste, energy supply, business and industry, land

use, and agriculture. It emphasises delivering emissions reductions fairly, maximising economic opportunities, and supporting a just transition.

Building on the Green Industrial Strategy, the Plan identifies major opportunity areas such as wind energy, Carbon Capture Utilisation and Storage (CCUS), hydrogen, and clean energy-intensive industries, and aims to create the conditions for long-term investment through clear policy signals.

It highlights ongoing work to integrate policy design with investment planning, ensuring that public sector funds are used to unlock, rather than replace, private capital and investment (Scottish Government, 2025c).

4.6 Conclusions on Climate and Energy Policy

Public policies at the International, UK and National levels are unambiguous in support of increased renewable electricity generation to combat climate change.

Progress against previously set targets at every level is occurring too slowly, with ever greater capacity needed in shorter timescales to counter both the lag in the rollout and increasing electricity demand as heating and transportation shift away from fossil fuels.

Onshore wind in particular, is fundamental to this increase in renewable generation capacity in Scotland with the need for larger turbines with higher capacity actively supported by Scottish Government Policy.

The weight being applied by the Scottish Government to the need for increasing the deployment of renewable energy and meeting climate change targets is clear in recent decisions.

Scotland offers the potential for renewable energy opportunities that can be homegrown and provide economic benefits, which can help to ensure that the Scottish economy becomes more resilient and less reliant on traditional carbon-based fuels. Renewable energy developments, such as the Proposed Development, can play a leading role in this.

The Proposed Development offers an opportunity to contribute valuable renewable energy generation and management, which would assist Scotland in addressing the climate change emergency in a relatively short timeframe, and in a key decade for Scotland to address climate change.

The Proposed Development is strongly supported by energy policy at all levels and significant weight should be given to these policies in establishing the planning balance.

5. Planning Policy Assessment - National Planning Policy

The following sections set out details of the relevant planning policy when considering the Application for the Proposed Development. It first considers the Development Plan and then other relevant Scottish Planning Guidance.

The Development Plan comprises the NPF4 and the Local Development Plan. Where the Local Development Plan has been adopted prior to the adoption and publication of NPF4, as is the case in this situation, the legislation (the 1997 Act section 24(3)) is clear that in the event of any incompatibility between a provision of NPF4 and a provision of the Local Development Plan the policy provision of NPF4 is to prevail.

5.1 National Planning Framework 4

NPF4 is the national spatial strategy for Scotland and also incorporates Scottish Planning Policy. It sets out the principles for spatial development, defines national developments and regional priorities and sets out national planning policy.

NPF4 sets out substantial and increased emphasis on the climate change and nature crises as well as net zero agenda to bring together cross-cutting priorities and achieve sustainable development through three key themes: sustainable places, liveable places and productive places.

NPF4 incorporates updated Scottish Planning Policy (Scottish Government, 2014) into one document with the National Spatial Strategy for Scotland 2045 detailed in Part 1 whilst Part 2 sets out National Planning Policies.

Part 1 of NPF4, the National Spatial Strategy for Scotland 2045 will be supported by the planning and delivery of sustainable places, *“where we reduce emissions, restore and better connect biodiversity”*. This states that:

“Scotland’s future places will be net zero, nature-positive places that are designed to reduce emissions and adapt to the impacts of climate change, whilst protecting, recovering and restoring our environment.”

In terms of renewable energy generation, NPF4 acknowledges that:

“A large and rapid increase in electricity generation from renewable sources will be essential for Scotland to meet its net zero emissions targets”

noting that:

“Additional electricity generation from renewables and electricity transmission capacity of scale is fundamental to achieving a net zero economy and supports improved network resilience in rural and island areas”.

Under Part 2, National Planning Policy 1 ‘Tackling the climate and nature crises’, states the approach to development proposals:

“When considering all development proposals significant weight will be given to the global climate and nature crises”.

It is clear that the introduction of NPF4 is having a material effect upon the weight that decision makers give to the global climate emergency and nature crisis.

When reviewing a development under the policies of NPF4, the advice of the chief planner in the letter of February 2023 (Scottish Government, 2023d) on the transitional arrangements for NPF4 should be borne in mind:

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

Together with the SLC’s Local Development Plan 2 (LDP2) (The South Lanarkshire Council, 2021), this constitutes the Development Plan under Section 24 of the 1997 Act.

NPF4 Policy 11: Energy

Policy 11 is the key policy relevant to the Proposed Development.

The policy is intended to;

“... encourage, promote and facilitate all forms of renewable energy development onshore and offshore. This includes energy generation, storage, new and replacement transmission and distribution infrastructure and emerging low-carbon and zero emissions technologies including hydrogen and carbon capture utilisation and storage (CCUS)”.

Section 11a of the policy states that:

“Development proposals for all forms of renewable, low-carbon and zero emissions technologies will be supported.”

The Proposed Development being a form of renewable development is considered to be supported by NPF4 under Policy 11a.

Section 11b of the policy states that:

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

The Proposed Development is not in a National Park or NSA and hence complies with Policy 11b.

Section 11c of the policy requires that:

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

As discussed in Section 3 of this report, the Proposed Development will support in producing more employment opportunities during construction, both at the local and more strategic level. The Proposed Development would contribute to socio-economic development, locally, regionally and nationally, both through the construction of the Proposed Development providing opportunities and the contribution to supporting the generation and use of renewable energy.

The Applicant is committed to continuing engagement with the local community regarding community benefit as the Proposed Development progresses. It is proposed that a Community Benefit Fund would be established with the intention of delivering local benefits.

It is concluded that the Proposed Development would maximise net economic impact as required by NPF4 Policy 11c.

NPF4 Policy 11d, requires that development proposals that impact on international or national designations be assessed in relation to Policy 4. A detailed assessment in the context of Policy 4 of NPF4 is provided later in this Section.

Table 3 considers the matters which are relevant considerations for all renewable energy development which are contained in Policy 11e of NPF4 and provides information on how the design and mitigation has addressed the potential impacts of the Proposed Development.

Careful consideration has been paid to the potential for mitigation of likely significant effects, as a result of the Proposed Development as part of the design process in accordance with the principles of the mitigation hierarchy.

Table 2: Proposed Development's Compliance with NPF4 Policy 11e

Policy Requirement	Compliance Summary
(i) Impact on communities and individual dwellings, including, residential amenity, visual impact, noise and shadow flicker	The potential effect on communities and individual dwellings has been fully assessed in Chapters 5-12 in Volume 2 of the EA R. The key findings are: <u>Residential Visual Amenity</u> Annex 5-1-2 of the Landscape and Visual Technical Appendix provides a Residential Visual Amenity Assessment (RVAA) of the Proposed Development. A total of 12 properties or property groups within 2 km of the Site are considered in the RVAA. The assessment confirms that the Proposed Development would not give rise to any increase in the magnitude of visual or cumulative effects for six properties or property groups. An increase in the magnitude of visual effect is anticipated for the remaining properties when compared to the Consented Development, particularly at RA7 Wester Mosshat, RA8 Easter Mosshat, RA9 Woolfords, RA10 2-3 Woolfords Farm Cottages, RA11 1 Woolfords Farm Cottages, RA12 Woolfords settlement and RA13 Woolfords Bungalows. However, the small increase in magnitude is not predicted to result in a material change to the overall level or significance of effects on residential visual amenity. <u>Visual Impact</u> The potential visual effects arising from the Proposed Development have been fully assessed in Technical Appendix 5-1 of the EA Report. The assessment confirms that, whilst there would be changes in views experienced by a range of receptors, including residential properties, road users, rail passengers and recreational users; these effects are generally localised and influenced by the existing pattern of wind farm development in the surrounding landscape. Within approximately 2.5 km of the Site, including at Woolfords and Auchengray, the Proposed Development would give rise to the highest magnitude of visual effects. At Woolfords, views would be more noticeably influenced by turbine proximity and blade overlap, resulting in a medium-large magnitude of effect and a moderate-major visual effect. Auchengray and Tarbrax would experience smaller magnitudes of change, resulting in moderate effects where views are available, although vegetation and built form provide partial screening and reduce overall visibility. Beyond 2.5 km, visual effects reduce notably as distance and intervening features limit visibility and reduce turbine prominence. Settlements such as Braehead, Forth, Carnwath, Libberton and Weston are predicted to experience small to negligible magnitudes of change, resulting in moderate-minor effects. In these locations, the Proposed Development would typically be perceived as part of the wider wind farm context, often appearing as an extension to Longhill Burn and other operational schemes. Along key transport routes, including the A70, A704, A706 and A71, visibility is generally intermittent due to landform, forestry and built development. Where views occur, they are typically brief and of limited extent, resulting in small to negligible magnitudes of effect and minor visual effects overall. Similarly, effects on rail passengers along the West Coast Main Line are largely confined to short sections near the Site, with moderate effects locally, reducing to minor effects across the route as a whole. Recreational receptors would also experience localised and intermittent views, with effects limited in extent and duration. The cumulative assessment indicates that the Proposed Development would be viewed within an established pattern of wind energy development, including Longhill Burn, Pates Hill and other operational and proposed schemes. In most views, it would appear as a logical extension to this existing cluster, with turbines of a similar scale and appearance.

Policy Requirement	Compliance Summary
	Cumulative visual effects are most notable in close proximity to the Site. At Woolfords, a medium magnitude of cumulative effect is predicted, resulting in a moderate–major effect. At nearby settlements such as Auchengray and Tarbrax, cumulative effects are moderate or moderate-minor. Beyond the immediate area, cumulative effects reduce with distance. For the majority of settlements in the wider study area—including Blackridge, Breich, Fauldhouse, Longridge and West Calder—effects are small or negligible, resulting in moderate-minor or minor effects. For transport routes and recreational receptors, cumulative effects are similarly limited due to intermittent visibility and the influence of existing wind farms and are generally assessed as minor. Noise The effect of noise generation resulting from the Proposed Development has been assessed and reported in Technical Appendix 8-1: Noise Assessment of the EA Report. The assessment confirms that effects from construction activities on residential receptors are anticipated to be non-significant due to the large distance. Noise from operation, including cumulative are predicted to be below the relevant noise limits; however, it is proposed that the operational noise will be controlled and site-specific noise limits will be applied, as required by the consent condition. Shadow Flicker Shadow flicker has been assessed in Section 12 of the EA Report using a conservative worst-case (bare earth) scenario. The results indicate that a number of properties at Woolfords Cottages could theoretically experience between 31-50 hours per year; however, actual effects are expected to be significantly lower in practice due to the influence of weather conditions and building orientation. The Applicant is committed to implementing a mitigation scheme for all properties within 10 rotor diameters, including the use of turbine-based control systems and light monitoring to manage shadow flicker in real time. These systems will enable the temporary shutdown of turbines where necessary to ensure that effects remain within accepted thresholds of 30 hours per year and 30 minutes per day. Details of the mitigation strategy will be agreed with the Planning Authority prior to commissioning. On this basis, no significant effects are anticipated.
(ii) Significant landscape and visual impacts, recognising that such impacts are to be expected for some forms of renewable energy. Where impacts are localised and/or appropriate design mitigation has been applied, they will generally be considered to be acceptable;	The Landscape and Visual Impact Assessment demonstrates that significant effects are largely localised and primarily concentrated within approximately 2.5km of the Proposed Development, where the turbines would appear more prominent and give rise to moderate to moderate-major landscape and visual effects in certain views. These effects are associated with proximity and the scale of change in the immediate landscape and visual receptors, particularly where existing wind farm development already forms a strong influence on character and views. Beyond this close range, both landscape and visual effects reduce significantly as a result of increasing distance, intervening landform, forestry and built form, with most receptors experiencing small or negligible magnitudes of change. This results in generally moderate-minor or minor effects across the wider study area. At the level of Landscape Character Types, effects are similarly localised, with only limited areas experiencing moderate effects in proximity to the site, and overall effects assessed as moderate-minor where the Proposed Development is seen in the context of existing wind energy development. Designated landscapes, including the Pentland Hills SLA, Bathgate Hills SLA, Blackridge Heights SLA and Upper Clyde Valley and Tinto SLA, would experience negligible effects, with the Proposed Development typically seen as a minor addition to established wind farm clusters and not affecting key landscape qualities, integrity or defining characteristics. Cumulatively, the Proposed Development would generally be perceived as part of an existing pattern of wind energy development within the landscape, particularly in association with Longhill Burn, Pates Hill and surrounding schemes. Overall, while significant effects occur in proximity, and are considered localised and acceptable in terms of NPF4 Policy 11(e)(ii), with no unacceptable landscape or visual impacts identified.
(iii) Public access, including impact on long distance	The assessment of effects on public access demonstrates that the Proposed Development would have limited and localised effects on walking, cycling and recreational routes, with no significant disruption to any long-distance paths or core active travel networks. Impacts are

Policy Requirement	Compliance Summary
walking and cycling routes and scenic routes	generally restricted to short sections of route where theoretical visibility of turbines is available, and are moderated by landform, forestry, and built form, which frequently limit or fragment views. No nationally promoted long-distance walking or cycling routes are directly affected by the Proposed Development, and there is no physical diversion of any public rights of way. Effects are therefore visual in nature rather than functional, with route continuity and recreational connectivity maintained throughout the study area. Where views are available, effects are generally short-lived and intermittent. On recreational routes such as CL/3151/1 (East Forth Road – Wilsontown Road) and CL/3155/1 (Wilsontown track), theoretical visibility is limited in extent and the Proposed Development would typically be seen as part of the wider established wind farm context, resulting in a moderate-minor level of visual effect at most. For road-based recreational and scenic journeys, including the A70, A704, A706 and A71, visibility of the Proposed Development is generally intermittent and often restricted to short glimpses due to screening by topography, forestry and settlement patterns. Where visible, the Proposed Development is typically experienced in the context of existing wind energy development and does not introduce a new or dominant feature within the wider sequential journey experience. Effects on road users are therefore predominantly minor or negligible.
(iv) Impacts on aviation and defence interests including seismological recording	The potential impact on aviation and defence operations has been assessed and reported in Section 12: Other Considerations of the EA Report. The increase in turbine tip height from 180m to 200m may marginally increase potential radar interaction; however, no significant effects are predicted. Radar mitigation has already been agreed in principle with NATS and Edinburgh Airport for the Consented Development and will be updated and implemented as required for the Proposed Development prior to construction. Aviation lighting will also be installed in accordance with Civil Aviation Authority and Ministry of Defence requirements, given the turbine height exceeds 150m. No effects are anticipated on en-route navigational aids, radio communication infrastructure, or seismological recording equipment. Subject to the implementation of agreed radar mitigation and aviation lighting controls secured through planning conditions, no significant residual effects on aviation or defence interests are predicted.
(v) Impacts on telecommunications and broadcasting installations, particularly ensuring that transmission links are not compromised	The potential impact on telecommunication operation been assessed and reported in Section 12: Other Considerations of the EA Report. There are no telecommunications link recorded within the Site boundary or in close proximity, and therefore no direct interference with existing transmission infrastructure is anticipated. The proposed increase in turbine tip height does not introduce any new theoretical constraints in relation to telecommunications or broadcasting receptors. The baseline situation remains unchanged from that assessed for the Consented Development, and no additional impacts on signal transmission paths, microwave links or broadcasting infrastructure are predicted.
(vi) Impacts on road traffic and on adjacent trunk roads, including during construction	The effects on traffic and the road network have been assessed in Technical Appendix 11-1: Transport and Access of the EA Report. The assessment of construction traffic associated with the Proposed Development confirms that there would be a temporary and short-term increase in vehicle movements during the approximately nine-month construction period, including HGVs, LGVs, staff vehicles and occasional abnormal loads. While there is an increase in material quantities compared to the Consented Development (notably stone, concrete and reinforcement), this results in only a modest uplift in daily traffic flows, concentrated during peak construction months. Traffic generation is distributed across a defined programme, with the highest daily increase equating to approximately six additional HGV movements per day in peak periods. Staff movements remain unchanged from the Consented Development and are largely outside peak network hours, reducing potential for interaction with commuter traffic. Construction traffic would be managed via established strategic routes, primarily the A899, A71, A704 and A70, with access via Auchengray Road. A worst-case assessment indicates that increases in total traffic flows on the principal network routes (A71, A899, A704 and A70) remain below 4%, which is considered negligible in traffic assessment terms. Corresponding HGV increases are similarly low and do not give rise to significant effects on trunk road capacity or safety.

Policy Requirement	Compliance Summary
	The only localised exception is Auchengray Road, where percentage increases are higher due to very low baseline flows. However, absolute increases remain small in practice (approximately 34 HGV movements per day at peak, equating to fewer than three HGVs per hour), with most traffic avoiding peak settlement hours and largely bypassing sensitive receptors. On this basis, effects are considered imperceptible in operational terms. Cumulative assessment confirms no significant interaction with other wind farm construction projects, as programme phasing and the implementation of Construction Traffic Management Plans would avoid overlapping peak traffic periods and coordinate deliveries effectively. With mitigation secured through a Construction Traffic Management Plan, including routing controls, delivery management, safety measures, and monitoring, residual effects on the road network are predicted to be negligible and not significant.
(vii) Impacts on historic environment	Technical Appendix 9-1: Cultural Heritage of the EA R assesses the likely significant impacts on historic assets. The Proposed Development has been assessed for effects on the historic environment, including both physical impacts on buried archaeology during construction and effects on the setting of designated heritage assets during operation. Construction effects relate to the potential disturbance of unknown or known buried archaeological remains within the Site. As the turbine locations remain unchanged from the Consented Development and the infrastructure footprint remains within the previously consented planning boundary, the nature and extent of physical impacts are also unchanged. There remains potential for impacts on post-medieval and earlier agricultural remains within the Site; however, these would be managed through micro-siting, fencing of known assets, and an archaeological watching brief. With mitigation in place, no significant residual physical effects are predicted. For operational effects, the increase in turbine tip height has been reviewed against the updated ZTV. This confirms no additional designated heritage assets are affected in comparison to the Consented Development, and no material change in visibility or setting effects occurs. Where visibility is present, it is typically distant and viewed within an existing context of operational wind farms, which already defines the wider landscape character. Cumulative effects have also been considered in the context of a landscape already characterised by extensive wind energy development. The Proposed Development would not alter the overall pattern or perception of wind farm development in relation to heritage assets, and no significant cumulative effects are identified.
(viii) Effects on hydrology, the water environment and flood risk	The Proposed Development has been assessed against the 2021 baseline to determine whether the increase in turbine tip height results in any material change to previously identified effects on hydrology, hydrogeology, peat, soils, groundwater-dependent ecosystems, geology, and flood risk. The revised layout remains consistent with the Consented Development and continues to comply with the established 50m buffers to watercourses. No changes are introduced to drainage patterns, catchment connectivity, or relationships with the Dippool Water and Harwood Water systems. Groundwater conditions remain limited due to underlying low-permeability geology, and no impacts on private water supplies are anticipated. Effects on hydrology and hydrogeology therefore remain Minor (not significant). The footprint continues to avoid extensive deep peat at a site-wide scale, with infrastructure largely located on shallow peat or mineral soils. At Turbine 3, limited interaction with deeper peat is restricted to temporary construction works only, with full reinstatement proposed post-construction. There is no increase in permanent peat loss or long-term carbon storage impacts, and effects remain Minor (adverse) and unchanged. Potential groundwater-dependent terrestrial ecosystems remain within previously identified habitat corridors. The revised design does not alter drainage regimes, groundwater dependence, or surface flow connectivity, which will continue to be maintained through existing design measures. Effects remain Moderate, with no change from the Consented Development. All infrastructure remains outside Coal Authority Development High Risk Areas and avoids recorded mining features. The geological baseline remains stable, and no new instability or legacy mining risks are introduced. Effects remain Negligible to Low (not significant). The Site continues to lie largely outside fluvial flood extents, with flood risk primarily associated with localised surface water. The increase in impermeable area is minimal and does not materially affect runoff or peak flows at a catchment scale. Sustainable drainage

Policy Requirement	Compliance Summary
	measures will continue to manage surface water effectively, and effects remain Negligible (not significant). Overall, the increase in turbine tip height does not result in any material change to previously assessed effects. The established mitigation framework, including the Construction Environmental Management Plan (CEMP) and Habitat Management Plan (HMP), remains appropriate and sufficient. Effects on hydrology, the water environment, and flood risk remain Minor to Moderate at most and not significant, consistent with the Consented Development.
(ix) Biodiversity including impacts on birds	Technical Appendix 6-1: Ecology and Ornithology Assessment assesses the likely significant impacts on Biodiversity and Birds. The Assessment concludes that during construction, limited habitat loss occurs, including blanket bog and modified grassland communities, but this remains minor adverse at a local scale due to the relatively small extent of loss and the widespread availability of similar habitats in the surrounding area. Key habitat functions are maintained through avoidance of sensitive areas and implementation of peatland restoration and habitat management measures secured through the CEMP and OHMP. Impacts on Groundwater Dependent Terrestrial Ecosystems, wet heath, and other mire and grassland communities are negligible to minor adverse, with no material change to hydrological conditions or habitat functionality compared with the consented scheme. For birds, including waders and Pink-footed goose, effects during construction are limited to temporary disturbance and localised displacement. Given the availability of alternative foraging and breeding habitat in the wider area, and low predicted usage of the site, effects remain minor adverse and not significant. No designated site connectivity or population-level effects are identified. During operation, collision risk and displacement effects for bird species remain very low, with avoidance rates and modelling confirming negligible population-level risk at both local and NHZ scales. Cumulative assessment across other wind farm developments also confirms no significant in-combination effects for key species groups. Overall, biodiversity effects, including those on birds, remain minor adverse at most and not significant, with no change from the Consented Development. Embedded mitigation, including habitat restoration, drainage management, and species protection measures, remains effective and sufficient, and no additional mitigation is required.
(x) Impacts on trees, woods and forests	There is no forestry on site, the distance of the woodland from the nearest turbine is 139 m. As such, there will be no loss of woodland or forestry is anticipated due to the Proposed Development.
(xi) Proposals for the decommissioning of developments, including ancillary infrastructure, and site restoration	Planning permission for the Proposed Development is sought for a 40-year operational period, after which the development will be decommissioned and the site restored, unless a further application is submitted to extend the operational life. In line with the established planning condition, a Restoration and Aftercare Plan will be submitted to South Lanarkshire Council no later than five years prior to the end of the consent period, or at a later date if agreed in writing. The Plan will include a detailed method statement covering the decommissioning of turbines and the full removal of all infrastructure, including buildings and ancillary development. Decommissioning works will be completed within 24 months of the end of the consent period, or within an alternative timescale agreed with the Planning Authority.
(xii) The quality of site restoration plans including the measures in place to safeguard or guarantee availability of finances to effectively implement those plans	In line with the established planning condition, a Restoration and Aftercare Plan must be submitted no later than five years prior to decommissioning (or as otherwise agreed) and will set out full site reinstatement measures, with decommissioning completed within 24 months of cessation. A Habitat Management Plan will also continue through the lifetime of the development, including decommissioning, and will be overseen by a Habitat Management Group with Council representation to monitor and adapt delivery as required. An Ecological Clerk of Works will be appointed for the decommissioning, restoration, and aftercare phases to ensure compliance with approved measures.
(xiii) Cumulative impacts	The potential for cumulative impacts as a result of the Proposed Development in combination with other wind farms has informed the design evolution. In line with NPF4 Policy 11, the potential for cumulative effect as a result of the Proposed Development has been fully assessed and mitigated in Chapters 5-11 of the EA Report.

The key to the final element of Policy 11 (e) is that significant weight is given to the proposal's contribution to renewable energy generation and greenhouse gas emissions reduction targets. The Proposed Development would have an overall generation capacity of 20 MW. This capacity would contribute to renewable energy generation and support the transition to Net Zero. This is a matter to which significant weight must be attached in the decision-making process.

The Proposed Development aligns with Policy 11 of NPF4. It has been carefully designed with appropriate mitigation measures to ensure there would be no significant adverse effects on the appreciation of assets and the special qualities for which designated areas are recognised. The development would deliver significant renewable energy and economic benefits, consistent with Part (e) of the policy.

Landscape and visual effects are largely localised, confined mainly to the immediate area. Overall, the contained nature of these effects, together with the wider benefits of the proposal, demonstrates that it accords with Policy 11.

NPF4 Policy 1: Tackling the Climate and Nature Crises

The intent of this policy is to; "... encourage, promote and facilitate development that addresses the global climate emergency and nature crisis".

In applying this policy, the Chief Planner (Scottish Government, 2023d) states:

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

In referencing cross cutting outcomes, NPF4 states:

"Policy 1 gives significant weight to the global climate emergency in order to ensure that it is recognised as a priority in all plans and decisions"

It is considered that this policy has primacy in terms of establishing the planning balance for the Proposed Development with the importance of tackling the climate emergency being seen in a global context, not just a National or regional one.

The Proposed Development will contribute directly to efforts to address the global climate emergency, making a material contribution to reducing Scotland's CO₂ emissions. Although the grid capacity of 20MW remains as per the consented development, the increase in tip height boosts the yield from the Proposed Development by approximately 18% with an estimated annual generation in the region of 65,353MWh per year, powering approximately 16,715 households in Scotland annually. It is anticipated that the Proposed Development will save approximately 22,977 tonnes CO₂ emissions per year, during its operational life, when compared to using the grid mix (Scottish Government 2021) would contribute to greenhouse gas emissions reduction and support the transition to Net Zero..

The Applicant has also ensured that addressing the nature crisis is central to the assessments detailed within the EA Report with enhancement measures detailed in the Outline Habitat Management Plan in the EA Report.

Taking the assessments of the EA Report and mitigation measures into account, it is considered that the Proposed Development will make a direct contribution to improving the natural environment.

The Proposed Development is therefore considered to be in accordance with NPF4 Policy 1.

NPF4 Policy 3: Biodiversity

The intent of this policy is to; *“protect biodiversity, reverse biodiversity loss, deliver positive effects from development and strengthen nature networks”*.

The policy requires that:

- (a) *“Development proposals will contribute to the enhancement of biodiversity, including where relevant, restoring degraded habitats and building and strengthening nature networks”*.
- (b) *“Development proposals for national or major development or for development that requires an Environmental Impact Assessment will only be supported where it can be demonstrated that the proposal will conserve, restore and enhance biodiversity, including nature networks so they are in a demonstrably better state than without intervention.”*

The potential for the presence of sensitive and/or protected species has been fully assessed within Technical Appendix 6-1: Ecology and Ornithology Assessment, Annex 6-1-2 Outline Habitat Management Plan, with no significant effects anticipated as a result of the Proposed Development.

The Proposed Development will result in the loss of 4.41 ha of blanket bog, an increase from 3.35 ha under the Consented Development due to larger turbine hardstandings and infrastructure reconfiguration. However, when considered in the context of the surrounding peatland resource, the impact remains minor adverse at a local level, consistent with the previous assessment.

To address this, the OHMP includes the restoration of 14.6 ha of degraded blanket bog, focusing on areas affected by artificial drainage and representing the most degraded and hydrologically suitable restoration opportunity within the Site. The approach adopted here reflects a site-specific strategy focused on delivering restoration in the areas of greatest ecological and hydrological benefit, with emphasis on long-term peatland recovery and functional improvement.

The Proposed Development therefore provides defined, deliverable and ecologically targeted habitat restoration, resulting in an improved peatland condition compared to the baseline condition of the Site.

Therefore, the Proposed Development is considered in accordance with NPF4 Policy 3 of NPF 4.

NPF4 Policy 4: Natural Places

NPF4 Policy 4 is intended to; *“protect, restore and enhance natural assets making best use of nature-based solutions”*.

This policy requires that:

- “a) Development proposals which by virtue of type, location or scale will have an unacceptable impact on the natural environment, will not be supported.*
- ...*
- c) Development proposals that will affect a National Park, National Scenic Area, Site of Special Scientific Interest or a National Nature Reserve will only be supported where:*
 - i. The objectives of designation and the overall integrity of the areas will not be compromised; or*

ii. Any significant adverse effects on the qualities for which the area has been designated are clearly outweighed by social, environmental or economic benefits of national importance.

d) Development proposals that affect a site designated as a local nature conservation site or landscape area in the LDP will only be supported where:

i. Development will not have significant adverse effects on the integrity of the area or the qualities for which it has been identified; or

ii. Any significant adverse effects on the integrity of the area are clearly outweighed by social, environmental or economic benefits of at least local importance.

...“f) Development proposals that are likely to have an adverse effect on species protected by legislation will only be supported where the proposal meets the relevant statutory tests. If there is reasonable evidence to suggest that a protected species is present on a site or may be affected by a proposed development, steps must be taken to establish its presence.”

The ecological and habitat effects of the Proposed Development are fully assessed within Technical Appendix 6-1: Ecology and Ornithology Assessment. This confirms that no significant adverse effects on designated ecological sites or protected species are anticipated, subject to mitigation.

The Proposed Development will result in a minor increase in localised ground disturbance associated with infrastructure, including areas of blanket bog. However, these effects are limited in extent and are not considered to affect the integrity of any designated sites, nor the wider natural environment in a significant manner.

Restoration measures proposed through the OHMP, will contribute to ecological improvement within the Site and support longer-term habitat resilience.

The assessment of the landscape and visual aspects, including designated sites, is provided in Technical Appendix 5-1: Landscape and Visual Assessment of the EA Report.

The LVA demonstrates that the Proposed Development would result in a slight increase in localised disturbance within the site, mainly because of the larger laydown areas required for the taller turbines. However, no change in landscape effects on designated landscapes or Landscape Character Types is predicted.

The assessment concludes that, given the location of the Proposed Development within a well-defined cumulative landscape influenced by existing development, there would be no effect on the integrity of the Bathgate Hills, Blackridge Heights, Pentland Hills, and Upper Clyde Valley and Tinto Special Landscape Areas.

It is therefore concluded that the Proposed Development is in accordance with Policy 4 of NPF4.

NPF4 Policy 5: Soils

NPF4 Policy 5 is intended to protect carbon-rich soils, restore peatlands and minimise disturbance to soils from development.

The policy states that:

“a) Development proposals will only be supported if they are designed and constructed:

i. In accordance with the mitigation hierarchy by first avoiding and then minimising the amount of disturbance to soils on undeveloped land; and

ii. In a manner that protects soil from damage including from compaction and erosion, and that minimises soil sealing.”

The policy goes to state that:

“c) Development proposals on peatland, carbon rich soils and priority peatland habitat will only be supported for:

i. Essential infrastructure and there is a specific locational need and no other suitable site;

ii. The generation of energy from renewable sources that optimises the contribution of the area to greenhouse gas emissions reductions targets;

...

d) Where development on peatland, carbon-rich soils or priority peatland habitat is proposed, a detailed site-specific assessment will be required to identify:

i. the baseline depth, habitat condition, quality and stability of carbon rich soils;

ii. the likely effects of the development on peatland, including on soil disturbance; and

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

In line with the mitigation hierarchy, the Proposed Development underwent extensive design iterations to address constraints identified during baseline studies. This involved adjusting turbine and infrastructure locations to avoid deeper peat areas and ecologically sensitive zones.

In particular, this included:

- Siting turbines at least 50m from watercourses; and
- Minimising the impacts on Priority Peatlands through taking account of survey results, along with other site constraints.

The Proposed Development continues to follow the established avoidance strategy, with infrastructure largely located within areas of shallow peat (<0.5 m) or mineral soils. The spatial arrangement of turbines, access tracks and associated infrastructure remains broadly consistent with the Consented Development and does not result in any material increase in encroachment into deep peat at a site-wide scale.

At Turbines 1 and 2, infrastructure remains sited on shallow peat or mineral soils, and the increase in turbine size does not result in any change in ground conditions or increased interaction with deeper peat deposits. At Turbine 3, there is limited interaction with deeper peat (>1.5 m); however, this is associated with temporary construction areas only, with permanent infrastructure sited on shallower or more competent ground where practicable.

These temporary effects will be reinstated following construction, including peat re-profiling and removal of temporary hardstanding, allowing for recovery of peatland function over time.

Micro-siting will also be employed during construction where necessary to further avoid unnecessary disturbance to peat, consistent with the mitigation hierarchy.

The Proposed Development will displace grid electricity generation and is expected to deliver an estimated saving of approximately 22,977 tonnes of CO₂ equivalent per year compared to a grid-mix baseline scenario, supporting wider decarbonisation objectives.

It is concluded that the Proposed Development is in accordance with Policy 5 of NPF4.

NPF4 Policy 7: Historic Assets and Places

This policy is intended to protect and enhance historic environment assets and places, and to enable positive change as a catalyst for the regeneration of places. This policy states:

“a) Development proposals with a potentially significant impact on historic assets or places will be accompanied by an assessment which is based on an understanding of the cultural significance of the historic asset and/or place. The assessment should identify the likely visual or physical impact of any proposals for change, including cumulative effects and provide a sound basis for managing the impacts of change.

Proposals should also be informed by national policy and guidance on managing change in the historic environment, and information held within Historic Environment Records”

The policy goes on to state that:

“h) Development proposals affecting scheduled monuments will only be supported where:

- i. direct impacts on the scheduled monument are avoided;*
- ii. significant adverse impacts on the integrity of the setting of a scheduled monument are avoided; or*
- iii. exceptional circumstances have been demonstrated to justify the impact on a scheduled monument and its setting and impacts on the monument or its setting have been minimised.”*

And:

“Where there is potential for non-designated buried archaeological remains to exist below a site, developers will provide an evaluation of the archaeological resource at an early stage so that planning authorities can assess impacts. Historic buildings may also have archaeological significance which is not understood and may require assessment.”

Technical Appendix 9-1: Cultural Heritage of the EA Report contains an assessment of effects on historic assets based on their cultural significance within and around the Site.

The historic environment baseline remains unchanged from the Consented Development. There are no designated heritage assets within the Site boundary, and no change to the baseline sensitivity or distribution of receptors.

In relation to buried archaeology, the Proposed Development has been assessed as presenting potential for impacts on unknown or known archaeological remains within the Site during construction.

The turbine locations remain unchanged from the Consented Development; however, there is a minor increase in the infrastructure footprint which introduces a limited additional area of ground disturbance potential. This does not introduce new receptor types or materially alter the archaeological sensitivity of the Site.

Construction effects therefore remain localised and are managed through micro-siting, avoidance of known or potential features where required, fencing of identified assets where appropriate, and an archaeological watching brief.

While there is a minor change in the spatial extent of potential ground disturbance, the likelihood of encountering remains and the overall significance of effects remain consistent with the previously assessed scheme. No significant residual physical effects are predicted.

For operational effects, the analysis of the updated ZTV confirms that no additional designated heritage assets are brought into theoretical visibility compared to the Consented Development. Where visibility occurs, it is limited, distant, and experienced within a landscape already characterised by operational wind farms. The increase in turbine height does not result in a material change to the magnitude or nature of effects previously assessed.

The assessment confirms that there is no significant adverse effect on the cultural significance, integrity of setting, or ability to understand, appreciate, and experience Scheduled Monuments or other designated heritage assets, including Listed Buildings, Conservation Areas, and Gardens and Designed Landscapes.

Cumulative effects have also been assessed and remain unchanged from the Consented Development, with no additional or significant cumulative impacts identified.

It is concluded that the Proposed Development is in accordance with Policy 7 of NPF4.

Policy 22: Flood Risk and Water Management

This policy aims to;

“... strengthen resilience to flood risk by promoting avoidance as a first principle and reducing the vulnerability of existing and future development to flooding.”

The potential effects of the Proposed Development on flood risk and water management are evaluated within Section 10: Hydrology, Hydrogeology, Geology and Ground Stability of the EA Report.

The Proposed Development will not have an adverse effect on the water environment because the revised layout continues to avoid all areas identified as being at high risk of fluvial flooding, and the site remains predominantly outside mapped flood extents.

While there is an increase in impermeable surface area associated with larger turbine bases and hardstandings, this is considered minimal in the context of the wider catchment and results in no material change to runoff volumes or peak flow contributions.

The surface water will be managed through appropriate Sustainable Drainage Systems (SuDS) consistent with best practice to ensure attenuation, controlled discharge, and sediment management during both construction and operation. Consequently, the Proposed Development is not expected to alter flood frequency or magnitude, and the significance of effects remains Negligible.

The Proposed Development is in accordance with Policy 22 of NPF4.

Policy 25: Community Wealth Building

This policy intends to;

“... encourage, promote and facilitate a new strategic approach to economic development that also provides a practical model for building a wellbeing economy at local, regional and national levels”.

This policy also states that development proposals will be supported where it is demonstrated that they will contribute to local or regional community wealth building strategies and provide economic opportunities such as local job creation and the use of local supply chains and services.

The Proposed Development will support economic activity during both construction and operation. Construction is expected to generate opportunities for Scottish-based contractors and local supply chains, particularly in civil engineering, groundworks, landscaping and associated services,

supporting local employment and skills development. This will contribute to the retention of economic activity within the region and support diversification towards higher value renewable energy-related sectors.

In addition, the Applicant commits to a Community Benefit Fund of £5,000 per MW per annum (index linked), equivalent to approximately £100,000 per annum or £4 million over the 40-year operational lifetime (20 MW installed capacity, 2026 prices). This provides a guaranteed long-term income stream to be directed by local communities towards locally identified priorities, supporting sustained economic and social benefits.

Overall, the Proposed Development delivers measurable economic impacts through construction-phase expenditure, employment and supply chain engagement, alongside long-term community investment, and is therefore considered to be in accordance with NPF4 Policy 25.

5.2 Planning Policy Assessment - The Local Development Plan

The Proposed Development is located within the administrative area of South Lanarkshire. In 2021, South Lanarkshire Council adopted the Local Development Plan 2 (South Lanarkshire Council LDP2, 2021).

The Local Development Plan 2 is currently being reviewed under the revised framework for Local Development Plans stated in NPF4 with LDP3 now in preparation

South Lanarkshire Council adopted the Local Development Plan 2

South Lanarkshire Council's adopted Local Development Plan 2 (LDP2) comprises Volume 1, which sets out the main planning policies, and Volume 2, which provides detailed supporting policy guidance.

LDP2 was adopted prior to the introduction of NPF4 and is based on the former Scottish Planning Policy framework. Where there is any inconsistency between LDP2 and NPF4, or where LDP2 is silent, the provisions of NPF4 prevail.

The table below identifies the relevant LDP2 policies that have informed the design and assessment of the Proposed Development. Cross-references are also provided to sections of this report where compliance with the current NPF4 National Planning Framework 4 framework is addressed.

Table 3: Local Development Plan 2 Policy Assessment

Policy	Summary	Assessment
Volume 1		
Policy 1 Spatial Strategy	The policy encourages sustainable economic growth and regeneration, move towards a low carbon economy, protect the natural and historic environment and mitigate the impacts of climate change.	The Proposed Development supports climate mitigation objectives whilst avoiding unacceptable effects on environmental interests as assessed in relation to NPF policies (Policy 1 and Policy 11) in Section 6.1. The Proposed Development supports the transition to a low-carbon economy through the delivery of approximately 20 MW of renewable energy generation, making a direct contribution toward national and local decarbonisation targets. The technical assessments undertaken for the EA Report demonstrate that the site can accommodate the Proposed Development without giving rise to unacceptable effects on landscape, ecological or cultural heritage interests.

Policy	Summary	Assessment
		The Proposed Development integrates with the existing pattern of wind energy development within the surrounding upland landscape. The Proposed Development is therefore in accordance with LDP2 Policy 1.
Policy Climate Change	2 Policy 2 specifies that proposals for new development must, where possible, seek to minimise and mitigate against the effects of climate change. The policy sets out a number of ways in which this should be achieved including utilising renewable energy sources and using, where appropriate, low and zero carbon energy generating technologies as well as promoting climate change adaptation through measures such as avoiding areas of flood risk, protecting water and soil environments, minimising impacts on carbon-rich soils, and safeguarding sensitive ecological receptors.	As determined in Section 5.1 above and in relation to NPF 4 Policies 1, 4, 5 and 22; the Proposed Development appropriately addresses climate resilience, peat protection and habitat enhancement objectives. The Proposed Development directly supports the objectives of Policy 2 through the generation of renewable energy and the displacement of fossil fuel generation. The Proposed Development is predicted to save approximately 22,977 tonnes of CO₂ annually, representing a material contribution toward greenhouse gas reduction targets and climate change mitigation objectives. The Proposed Development layout has been developed to avoid areas of highest flood risk, minimise disturbance to carbon rich soils and protect sensitive ecological receptors. The OHMP contains restoration and enhancement measures which will contribute positively to on-site habitat improvement over the operational life of the development. The Proposed Development is therefore in accordance with LDP2 Policy 2.
Policy 4 Green Belt and Rural Areas	Policy 4 sets out appropriate use of the countryside and the requirement for development proposals in the green belt or rural areas to demonstrate a clear locational need for their proposed location. The policy seeks to ensure that development is directed to suitable locations and that the character and function of the countryside are protected..	The Proposed Development is situated within an upland landscape already influenced by operational wind farm development and has been designed to integrate with this established pattern of development. Technical Appendix 5-1: Landscape and Visual Assessment demonstrates that effects on the wider rural character and amenity of the area remain acceptable. As a result the scale and siting of the Proposed Development are considered appropriate within this receiving landscape. The Proposed Development is therefore in accordance with LDP2 Policy 4.
Policy Development Management and Placemaking	5 Policy 5 requires that all development proposals take account of and be integrated with the local context . Development proposals should have no significant adverse impacts on the local community and environment and should include measures to enhance the environment where possible.	It is noted that Policy 5 is based on the superseded Scottish Planning Policy (SPP) placemaking framework and is now applied in the context of NPF4 principles, particularly those relating to siting, scale, and landscape integration. The Proposed Development has been designed to minimise effects on residential amenity and landscape character whilst supporting renewable energy generation. The Proposed Development sought to integrate the development with the existing pattern of wind energy development within the receiving landscape. The technical assessments undertaken for landscape and visual effects, noise, shadow flicker, traffic and residential amenity demonstrate that there not be any additional significant effect on the local community. The

Policy	Summary	Assessment
		predicted effect will be managed through appropriate mitigation measures. The Proposed Development also includes habitat enhancement measures through the OHMP. The Proposed Development is therefore in accordance with LDP2 Policy 5.
Policy 14 Natural and Historic Environment	Policy 14 states that the Council will assess all development proposals in terms of their effect on the character and amenity of the natural and built environment.	The Proposed Development has been designed to avoid direct effects on protected sites and to minimise indirect effects through embedded mitigation and careful siting. Technical Appendix 6-1: Ecology and Ornithology Assessment confirms that ecological interests can be safeguarded, while Technical Appendix 9-1: Cultural Heritage Assessment demonstrates that there are no designated heritage assets within the Site and that potential effects on archaeology and heritage assets remain unchanged from the Consented Development. A minor increase in infrastructure footprint does not alter the significance of effects, and the integrity, setting, and cultural significance of heritage assets would remain acceptable in accordance with NPF4 Policy 7. The Proposed Development is therefore in accordance with LDP2 Policy 14.
Policy 16 Water Environment and Flooding	Policy 16 states that Water Environment and Flooding, impacts to be appropriately managed, including consideration of water levels, flows, quality, biodiversity and flood risk. Use of buffers and 'no development zones' from watercourses to be implemented as appropriate.	The Proposed Development layout continues to avoid all areas identified as being at high risk of fluvial flooding, and the site remains predominantly outside mapped flood extents. The hydrology and flood risk review undertaken as part of the environmental appraisal in Section 10 of the EA Report demonstrates that the use of SuDS, appropriate watercourse buffers and drainage controls will ensure that runoff rates and water quality effects remain acceptable. The Proposed Development is therefore in accordance with LDP2 Policy 16.
Policy 18 Renewable Energy	Policy 18 states that applications for renewable energy infrastructure developments will be supported subject to an assessment against the spatial framework principles as set out in the 2014 published Scottish Planning Policy (Scottish Government, 2014), and sets out that energy proposals will be assessed against the LDP Assessment Checklist for Renewable Energy Proposals. The checklist provides a structured framework for assessment of renewable energy developments, covering key criteria including landscape and visual impact, residential amenity, ecology, hydrology, peat and soils, cultural heritage, transport and access, aviation and telecommunications, cumulative impacts, and other relevant environmental and technical considerations.	The Proposed Development has been assessed against NPF4 Policies 11 and is considered to accord with the national policy support for renewable energy development in suitable locations where impacts are appropriately managed. The Proposed Development directly supports the objectives of Policy 18 through the delivery of approximately 20 MW of renewable energy generation, contributing toward national and local decarbonisation and energy security objectives. The proposal has been assessed against the Renewable Energy Development Checklist, which has informed the environmental and technical appraisal of the development. The technical assessments within the EA Report demonstrate that the environmental and technical effects of the proposal can be appropriately managed through embedded mitigation. The Landscape and Visual Assessment confirms that the site is located within an upland landscape already influenced by operational and consented wind farm development, and that the proposed layout has been designed to integrate with this established pattern of development. This reduces the potential for fragmented

Policy	Summary	Assessment
		turbine groups and ensures cumulative effects remain acceptable. Ecology, hydrology, peat, noise, aviation, traffic and cultural heritage assessments similarly confirm that no unacceptable significant effects would arise. Although Policy 18 and the associated capacity guidance were originally prepared under the former SPP policy framework, these policies must now be read in the context of NPF4, which forms part of the statutory development plan.
Volume 2		
DM1 - New Development Design	Policy DM1 requires development to promote quality and sustainability by respecting the local context in terms of layout, scale, proportion, and massing. Proposals must incorporate energy efficient designs, sustainable drainage systems (SuDS), and green infrastructure like native trees and landscaping.	The Proposed Development sites in the established wind energy cluster. The integration of SuDS and the ecological enhancements within the OHMP confirms a commitment to sustainable design and high-quality site restoration, satisfying the requirements of Policy DM1
Policy NHE2 - Archaeological Sites and Monuments	Policy NHE2 mandates that Scheduled Monuments be preserved in situ and in an appropriate setting, with adverse impacts allowed only in exceptional circumstances. For non-scheduled archaeological resources, the Council will weigh the significance of impacts against the merits of the development. Developers may be required to provide an archaeological evaluation, and where preservation is not possible, they must make provision for excavation, recording, analysis, and publication	The Proposed Development has also been assessed against LDP2 historic environment policies which relate to archaeology, listed buildings, gardens and designed landscapes, and conservation areas. These policies are applied in conjunction with, and must be interpreted in accordance with, NPF4 Policy 7, which forms the primary policy framework for the historic environment. As set out in the NPF4 Policy 7 assessment, the historic environment baseline remains unchanged from the Consented Development. There are no designated heritage assets within the Site, and no material change in the nature of effects on heritage receptors arises from the Proposed Development.
Policy NHE3 - Listed Buildings	Policy NHE3 states that development affecting a Listed Building or its setting must, as a first principle, seek to preserve the building, its setting, and any features of special architectural interest. The layout, design, materials, and scale of any proposal must be sensitive to and respect the character and appearance of the heritage asset. Any repairs or alterations are required to demonstrate a sound knowledge and understanding of the building's cultural significance and historical development.	In relation to archaeological interests there remains potential for buried archaeological remains within the Site. While the turbine locations remain unchanged, a minor increase in infrastructure footprint introduces a limited additional area of ground disturbance potential. However, this does not alter the archaeological sensitivity of the Site or the likelihood of encountering remains to a degree that changes the significance of effects. Construction impacts remain controlled through micro-siting, avoidance where appropriate, and archaeological watching brief mitigation. No significant residual effects are predicted.
Policy NHE4 - Gardens and Designed Landscapes	Policy NHE4 requires that any development affecting sites listed in the Inventory of Gardens and Designed Landscapes must protect, preserve and, where appropriate, enhance such locations. Proposals must not significantly impact adversely upon the character of these landscapes, important views to, from, and within them, or the site or setting of component features that contribute to their value. Development will only be permitted if, after mitigation measures, there remains no significant adverse impact on the protected resource, or if the conservation value of the designed landscape is ultimately enhanced.	For built heritage assets including Listed Buildings, Gardens and Designed Landscapes, and Conservation Areas, no direct effects arise as no designated assets are located within the Site. The updated ZTV confirms no material change in visibility or setting effects compared to the Consented Development. Where visibility occurs, it is limited, distant, and experienced within a landscape already characterised by operational wind farms.
Policy NHE6 - Conservation Areas	Policy NHE6 requires that development or demolition within a Conservation Area, or affecting its setting, must preserve or enhance its character. All proposals should be consistent with	The presence of existing wind energy development forms part of the established baseline context, and the Proposed Development does not alter the ability to understand, appreciate, or experience the significance of designated heritage assets.

Policy	Summary	Assessment
	any relevant Conservation Area appraisal or management plan prepared for the area. The design, materials, scale, and siting of any development must be appropriate to the character of the Conservation Area and its setting. Additionally, the policy mandates that trees considered to have amenity value and which contribute to the area's character shall be preserved. To prevent vacant sites, consent for demolition may be subject to conditions prohibiting work until a contract has been let for an approved redevelopment scheme.	Cumulative effects remain unchanged and are not considered significant. Overall, and having regard to the detailed assessment undertaken under NPF4 Policy 7, the Proposed Development does not result in any significant adverse effects on the historic environment.
Policy NHE7 - Natura 2000 Sites	Policy NHE7 mandates that any development likely to have a significant effect on a Natura 2000 site will be subject to an appropriate assessment. Where such an assessment cannot conclude that the development will not adversely affect the integrity of the site, development will only be permitted if there are no alternative solutions, there are imperative reasons of overriding public interest, and compensatory measures are provided to protect the overall coherence of the Natura network. For sites hosting priority habitats or species, prior consultation with the European Commission is required unless the proposal is necessary for public health or safety or has beneficial consequences to the environment. These requirements apply to all sites that could be affected, including those adjoining or located outwith the boundary of South Lanarkshire.	Technical Appendix 6-1: Ecology and Ornithology Assessment has assessed the effects of the Proposed Development on ecological receptors, including designated sites, habitats and protected species. The assessment under NPF4 Policies 3, 4 and 11 identifies that habitat loss is limited in scale and occurs within a wider context of broadly similar and functionally connected habitat. The areas affected are of relatively low ecological sensitivity and do not contain features that would indicate constraints beyond the local level, with effects largely confined to the defined infrastructure footprint and consistent with the established baseline condition. Effects on biodiversity and ornithological interests are primarily associated with temporary disturbance during construction and limited displacement during operation. These occur within a wider landscape where similar habitat is readily available, and where species are not reliant on the Site for critical stages of their life cycle. No population-level effects are identified, and the ecological function of the surrounding area remains unchanged.
Policy NHE8 - National Nature Reserves and Sites of Special Scientific Interest	Policy NHE8 stipulates that development affecting a SSSI or National Nature Reserve will only be permitted where an appraisal demonstrates that the objectives of designation and the overall integrity of the area will not be compromised. If the proposal results in significant adverse effects on the qualities for which the area was designated, it will only be allowed if those effects are clearly outweighed by social, environmental, or economic benefits of national importance.	No direct effects on designated ecological sites occur, and no pathways for indirect effects that could affect site integrity have been identified. The relationship between the Site and the wider designated network therefore remains unchanged from that assessed under the national policy framework.
Policy NHE9 - Protected Species	Policy NHE9 prohibits development that would impact a European Protected Species unless it is required for public health or safety, there is no satisfactory alternative, and the action is not detrimental to the favourable conservation status of the species. Similar restrictions apply to species protected under the Wildlife and Countryside Act 1981, requiring that development contribute to significant social, economic, or environmental benefit with no other satisfactory solution. Additionally, any development likely to have a significant effect on other protected species must be justified in accordance with relevant legislation. Where invasive non-native species are present or planting is proposed, developers must demonstrate that they have fully accounted for the provisions of the Wildlife and Countryside Act.	Mitigations are embedded within the design and construction approach, including habitat management and peatland restoration measures, ensuring that effects are controlled and that opportunities for ecological enhancement within the Site are delivered where practicable.

Policy	Summary	Assessment
Policy NHE11 - Peatland and Carbon Rich Soils	Policy NHE11 aims to protect peatland and carbon rich soils from adverse impacts to prevent the release of CO2 emissions. Any development proposals affecting peat must be accompanied by a full peat survey and a peatland habitat assessment to demonstrate how impacts will be avoided or minimised. Where appropriate, applications must include a schedule of mitigation measures, a method statement for re-instatement, and a management or enhancement plan to compensate for any significant losses. Renewable energy proposals will be specifically assessed using a dedicated checklist and guidance. For ancillary peat extraction, the Council requires best practice in handling, storage, and restoration to minimise degradation and promote active peat formation.	The Proposed Development has been designed to avoid unnecessary disturbance to peat and soils, minimise impacts through informed design measures, and manage peat responsibly in accordance with national policy and guidance. Interaction with deeper peat is restricted to temporary works at Turbine 3, with planned reinstatement following completion of works. Over its lifetime, the Proposed Development is expected to displace a grid-mix equivalent of 22,977 tonnes CO₂ emissions per year during its 40-year operational life. This LDP2 policy must now be read alongside NPF4 Policy 5 (Soils) and Policy 11, which support renewable energy development on peatland where it contributes to greenhouse gas emissions reduction targets. The Proposed Development has been assessed against NPF4 Policy 5 and Policy 11, as set out in Section 5.1, and is considered to be in accordance with national policy requirements. Accordingly, the Proposed Development is considered to be in accordance with Policy NHE11.
Policy NHE12 - Water Environment and Biodiversity	Policy NHE12 requires development proposals to protect and where possible enhance the water environment. Proposals that would have a significant adverse impact, considering water levels, flows, quality, flood risk, and biodiversity, will not be permitted. Developments must be designed to minimise impact through the use of blue/green network links, Sustainable Drainage Systems (SuDS), and adequately sized buffer strips to protect the riparian zone. Furthermore, physical changes to the water environment, such as culverting for land gain, should be avoided.	The design maintains a 50m buffer from all watercourses to protect the riparian zone and uses SuDS to manage sediment and flow. The project avoids physical changes to the water environment, and ensures that biodiversity associated with waterbodies is protected, fulfilling the criteria of Policy NHE12.
Policy NHE16 - Landscape	Policy NHE16 states that development within Special Landscape Areas will only be permitted if it accords with Green Belt and Rural Area policies and can be accommodated without an unacceptable significant adverse effect on the landscape character, scenic interest, and special qualities of the area. All proposals within or adjacent to an SLA must take into account the Council's Validating Local Landscape Designations report. Across both SLAs and the wider landscape, development must maintain and enhance landscape character, including the scale, design, and location of buildings, the setting of settlements, and the pattern of woodland, fields, and waterbodies. Proposals should protect historical qualities, landform features such as notable skylines, and views to and from them. Developers must also take account of the South Lanarkshire Landscape Assessment and relevant Landscape Capacity Studies for wind energy and tall turbines.	As analysed under NPF4 Policy 11(e), significant landscape effects are assessed as being largely localised and primarily concentrated within approximately 2.5km of the Proposed Development, where the turbines would appear more prominent and give rise to moderate to moderate-major landscape and visual effects in certain views. The project does not adversely affect the integrity of the Pentland Hills SLA or other regional designations. The turbines will be perceived as a logical addition to a landscape already characterized by wind energy development, satisfying Policy NHE16.
Policy NHE18 -	Policy NHE18 requires the Council to safeguard existing and proposed walking, cycling, and riding	The Proposed Development ensures no physical obstruction or diversion of public rights of way or core

Policy	Summary	Assessment
Walking, Cycling and Riding Routes	routes, as well as core water routes and access/egress points identified in the Core Paths Plan. Particular support is provided for the development of the Clyde Walkway and National Cycle Network Routes 74 and 75 along the identified lines.	paths. Functional connectivity for recreational users is fully maintained. While visual changes occur on short sections of local routes, they do not diminish the overall utility or enjoyment of the network, adhering to Policy NHE18.
Policy NHE20 - Biodiversity	Policy NHE20 aims to further the conservation of biodiversity by requiring that development proposals demonstrate no significant adverse impact on biodiversity, including cumulative impacts. Proposals likely to result in a significant loss of biodiversity will only be supported if adequate mitigation and offsetting measures are agreed upon with the Council. Additionally, development affecting designated nature conservation sites will be assessed against the specific requirements of the relevant LDP2 policy for that designation. Proposals should also seek opportunities to contribute positively to biodiversity conservation and enhancement in a manner that is proportionate to the scale and nature of the development.	The technical assessment confirms that any habitat loss is minor and localised. The project provides biodiversity net gain through the restoration of degraded peatland and the creation of habitat corridors within the OHMP. These measures ensure the development contributes positively to local biodiversity conservation, complying with Policy NHE20.
Policy RE1 - Renewable Energy	Policy RE1 mandates that all proposals for renewable energy development must take into account specific considerations, criteria, and guidance. Specifically, applications are required to align with the Assessment Checklist for Renewable Energy Proposals found in Volume 2, Appendix 1, as well as the Supporting Planning Guidance on Renewable Energy. Furthermore, proposals must consider the Landscape Capacity Study for Wind Energy 2016 (incorporating the Tall Wind Turbines Guidance 2019) and ensure compliance with other relevant policies within LDP2.	The Proposed Development lies within the Plateau Moorland Landscape Character Type, which the 2019 Tall Wind Turbines Guidance identifies as having High-Medium capacity for turbines exceeding 150 m in height. The Proposed Development has therefore been developed within a landscape identified as capable of accommodating larger scale wind energy development. The layout has also been specifically designed to cluster with the existing operational and consented wind farms, creating a coherent extension to the existing pattern of development and avoiding the perception of isolated or dispersed turbine groups. The Landscape and Visual Assessment confirms that effects on landscape character, designated landscapes and visual amenity would remain acceptable, while the wider technical assessments demonstrate that ecological, hydrological, peat, residential amenity, aviation and infrastructure effects can all be appropriately mitigated. Although RE1 and the associated capacity guidance were originally prepared under the former SPP policy framework, these policies must now be read in the context of NPF4, which forms part of the statutory development plan. The Proposed Development has been assessed against NPF4 Policies 11 and is considered to accord with the national policy support for renewable energy development in suitable locations where impacts are appropriately managed.

6. Conclusion

The Proposed Development provides an opportunity for creation of a renewable energy development which would have a generating capacity of 20 MW, which would make a meaningful contribution to meeting Scotland Climate Change commitments. The 20m increase in turbine tip height, compared to the consented development, will result in approximately 18% increase in the renewable energy output from the three turbines with minimal additional environmental impact.

6.1 Energy Policy and Relevant Targets

The Proposed Development will make a valuable contribution to Scotland's renewable electricity and emissions reduction targets. Since the publication of the NPF4, policy wording has become stronger and the challenge in meeting renewable energy targets and addressing the climate emergency has become more urgent.

The renewable energy generated by the Proposed Development will offer further assistance in the urgent need to decrease the reliance of the UK on fossil fuels. As shown in the recent Climate Change Committee (CCC) June 2023 Report to the UK Parliament (CCC 2023) the deployment of onshore wind is "slightly off-track", noting that deployment is progressing more slowly than other forms of renewable energy "despite being among the cheapest forms of electricity generation".

This was again supported by the UK Climate Change Committee's 2025 report to Parliament finds that despite government commitments to enhance resilience, efforts are slow and lack clear direction and are inadequate for current and future climate risks (CCC, 2025b).

There is a need to apply significant weight on addressing the climate emergency through the roll out of further developments which enable renewable electricity generation whilst giving due consideration to energy policy and targets in the planning balance.

The Proposed Development will add a valuable contribution to the legally binding net-zero targets set by the Scottish Government through reducing the need for fossil fuel-powered generation to balance the intermittency of renewable sources.

Furthermore, clear direction regarding the approach that local development plans are advised to take on renewable developments is provided in NPF4 Policy 11 Energy, noting that:

"LDPs should seek to realise their area's full potential for electricity and heat from renewable, low carbon and zero emission sources by identifying a range of opportunities for energy development."

Accordingly, the Proposed Development presents the opportunity to make a direct contribution to achieving renewable energy deployment and carbon reduction objectives.

6.2 Economic and Community Impacts

The Applicant is committed to ensure that the Proposed Development would have a community benefit fund, which would benefit the local community.

The Proposed Development would result in socio-economic benefits through all phases of the Proposed Development. The Applicant has sought to maximise the socio-economic impact of the Proposed Development and will continue to engage with the community through the planning and development process.

6.3 Environmental Impacts

The EA Report identifies that effects arising from the Proposed Development are generally localised and largely consistent with those previously assessed for the Consented Development, reflecting the broadly unchanged site layout and infrastructure footprint.

No significant effects are identified in relation to landscape and visual amenity, ecology, cultural heritage, or peat and soils, with any residual effects being minor and capable of effective mitigation through embedded design and management measures, including habitat enhancement and peatland restoration.

Overall, the environmental effects are considered acceptable in planning terms and are outweighed by the wider benefits of the Proposed Development in supporting renewable energy generation and contributing to climate change objectives.

6.4 Summary

In considering the impacts, of the Proposed Development, significant weight is to be placed on the contribution of the Proposed Development to renewable energy generation targets and on GHG emissions reduction ambitions. The Proposed Development would generate and supply a considerable amount of electricity per year..

This report has sought to consider and balance the relevant considerations, determine what weight is to be given to each consideration and come to a view on where the planning / consenting balance falls, in accordance with Section 25 of the Town and Country Planning (Scotland) Act 1997.

It is considered that the Proposed Development is supported by the relevant planning and renewable energy policy. It is concluded that the impacts of the Proposed Development are acceptable in the context of the positive benefits of the Proposed Development.

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