



# Moorshield Wind Farm

## Planning Statement

Moorshield Wind Farm Limited

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## Basis of Report

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## Executive Summary

Moorshield Wind Farm Limited ('the Applicant') proposes to construct and operate a three turbine wind farm development to be known as Moorshield Wind Farm on land east of Shieldhill Farm, Newton Mearns.

A previous planning application (ref 2020/0217/TP) for a three turbine wind farm development was refused by East Renfrewshire Council on the 13 October 2022. That previous application was refused on the grounds of locally significant landscape and visual impacts as well as aviation safeguarding impacts on Glasgow Prestwick Airport.

This planning application is a repeat planning application of the previously refused application. Consequently, the land to which the applications relate are the same. The description of development is also the same as the previous application.

The Applicant is submitting a repeat planning application given that there have been significant changes to national planning policy introduced since the previously application was determined. These include the publication of the Onshore Wind Policy Statement (OWPS) in December 2022 and the adoption of National Planning Framework 4 (NPF4) in February 2023. NPF4 forms part of the statutory Development Plan for the determination of planning applications. On the basis of the changes to national planning policy introduced, it is considered that the planning balance now lies firmly in favour of the Proposed Development and that consequently planning permission should be granted.

Reducing greenhouse gas emissions is a cross cutting theme of NPF4, with NPF4 Policy 1 now requiring that significant weight must be given to the global climate emergency in the determination of all planning applications. The intent of Policy 1 is to encourage, promote and facilitate development that addresses the global climate crisis. The Proposed Development would contribute to that objective.

Both NPF4 and the OWPS provide very strong support for onshore wind energy development, with NPF4 Policy 11 on energy supportive of wind farm developments in principle outwith National Parks and National Scenic Areas. The Proposed Development satisfies this locational requirement.

NPF4 Policy 11 gives express support to proposals for wind energy developments that maximise their net economic benefit. The Proposed Development would create local and wider employment opportunities, as well as creating other opportunities for local and wider supply chain businesses. The Applicant is also committed to provision of a community benefits package as well as opportunities for the local community to invest in the Proposed Development. The Proposed Development therefore satisfies this socio-economic requirement.

NPF4 requires that renewable energy proposals address a range of other environmental and technical constraints, including landscape and visual, through project design and mitigation. The planning history of this site illustrates a commitment to seek to address, as far as possible, the landscape and visual impacts of a proposal in this location through continued design improvements. The scale of the design changes over this history are substantial, with the scheme as currently proposed substantially smaller than the previous 19 turbine Moorhouse Farmers scheme (2010/0241/TP) and six turbine Soame Wind Farm schemes (2014/0820/TP) that were originally proposed. It is considered that the proposed three turbine scheme as submitted in this application achieves a simple, compact and coherent layout that successfully incorporates best practice design advice for onshore wind energy developments. Whilst the Proposed Development would inevitably result in some significant landscape and visual effects, such effects would be localised and contained. Part (e) section ii) of NPF4 now states that significant landscape and visual impacts are to be expected for onshore wind energy developments, and that where impacts are localised and/or appropriate design mitigation has been applied, that they will generally be considered acceptable. Given this more permissive policy context, it is considered that the Planning Authority's reason for refusal of the previous application on localised landscape and visual effects is no longer reasonable. This conclusion also reflects the concluding section of Policy 11 which states that in considering these impacts that significant weight should be placed on the contribution of the proposal to renewable energy generation targets and on greenhouse gas emission targets.



As set out in the previous application, it is considered that the Proposed Development will not cause a significant adverse effect upon the safety and efficiency of Glasgow Prestwick Airport's air traffic service. Notwithstanding this conclusion, should there be any doubt on this matter it is highly likely that a technically and commercial mitigation solution is capable of being identified and implemented well within the lifetime of a planning permission for the Proposed Development. On that basis, it is considered that this aviation safety matter could be overcome and controlled by suspensive conditions. Such a condition would prevent the operation of any wind turbines forming part of the Proposed Development prior to the agreement and implementation of the relevant mitigation scheme. Recent appeal decisions from Scottish Ministers for Sanquhar II Community Wind Farm and Clauchrie Wind Farm support this conclusion.

On the basis of the technical and environmental assessments submitted in support of this application, it is concluded that the other environmental effects of the Proposed Development will be acceptable and could be adequately controlled through both the mitigation measures proposed or through conditions. The consultee responses and the Planning Officer's Report of Handling for the previous application support this conclusion.

It is therefore concluded that the Proposed Development accords overall with the relevant provisions of the Development Plan and that there are no material considerations which would still justify refusing planning permission for this repeat application.



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## 1.0 Introduction

### 1.1 The Application

1. This Planning Statement has been prepared on behalf of Moorshield Wind Farm Limited ('the Applicant') to accompany a planning application under the Town and Country Planning (Scotland) Act 1997 (as amended) for the construction and operation of Moorshield Wind Farm ('the Proposed Development') on land east of Shieldhill Farm, Newton Mearns.
2. This application is a repeat planning application of the previous planning application (2020/0217/TP) for the same description of development which was refused by East Renfrewshire Council on 13 October 2022. That application was refused on the grounds of locally significant landscape and visual impacts as well as aviation safeguarding impacts on Glasgow Prestwick Airport. It is considered that changes to national planning policy since the determination of that application mean that planning permission should now be granted.
3. Except for an updated Landscape and Visual Appraisal (**Appendix 2.1**), this application is accompanied by the same environmental and technical assessments which accompanied the previous application. These assessments are included as appendices to this statement, and reference is made to the conclusions of these reports in this statement in assessing the acceptability of the proposals. Copies of consultation responses [**Documents CON1 to CON12**] and the Report of Handling [**Document ERC1**] for the previous application are also included as appendices to this statement, and reference is also made to these in assessing the acceptability of the proposals.

### 1.2 The Applicant

4. Moorshield Wind Farm Limited is the legal entity set up for the sole purposes of developing the Proposed Development and is a subsidiary of EDPR. Moorshield Wind Farm is being developed by Wind2 on behalf of EDPR.
5. Wind2 is a specialist renewables developer founded in 2016. The company has staff based in the Highlands, Perth, Edinburgh and Wales, with significant expertise and a track record of successfully developing onshore wind farm projects across the UK. Further information on Wind2 can be found on its corporate website at <https://wind2.co.uk>.
6. EDPR is a global leader in the renewable energy sector and the world's fourth largest renewable energy developer. EDPR is currently present in the UK and has personnel based in Edinburgh. Further information on EDPR can be found on its corporate website at <https://www.edpr.com/en>.

### 1.3 Purpose of this Planning Statement

7. The primary purpose of this Planning Statement is to provide an assessment of the Proposed Development against Development Plan policy and other relevant material considerations. Chapter 2 provides an overview of the planning history of the application site. Chapter 3 provides the project description. Chapter 4 sets out the benefits of the Proposed Development. Chapter 5 provides the planning policy assessment, including the updated Development Plan policy against which this repeat application should now be assessed. Chapter 6 weighs up the planning case for the Proposed Development and provides concluding remarks on the acceptability of the scheme and the reasons why it is considered planning permission should now be granted.



## 2.0 Planning History

### 2.1 Introduction

8. The application site of the Proposed Development has been the subject of three previous applications that are relevant to this repeat application. This chapter outlines each of these previous applications.

### 2.2 Moorhouse Farmers Scheme

9. A planning application (2010/0241/TP) for the erection of 19 wind turbines of 126 m height to blade tip and associated development was submitted to East Renfrewshire Council in April 2010 ('the Moorhouse Farmers Scheme'). The site of the Moorhouse Farmers Scheme covered an area that includes the current application site for the Proposed Development. Planning permission was refused in April 2012, and a subsequent appeal to Scottish Ministers (PPA-220-2020) was refused in December 2012.

### 2.3 Soame Scheme

10. A planning application (2014/0820/TP) for the erection of six wind turbines of 76.5 m height to blade tip and associated development was submitted to East Renfrewshire Council in December 2014 ('the Soame Scheme'). The site of the Soame Scheme was much smaller than the Moorhouse Farmers Scheme but still covered an area that includes the current application site for the Proposed Development. Planning permission was refused in March 2018, and a subsequent appeal to Scottish Ministers (PPA-220-2048) was refused in October 2018.

### 2.4 Moorshield Wind Farm

11. A planning application (2020/0217/TP) for the erection of three wind turbines of 149.9 m height to blade tip and associated development was submitted to East Renfrewshire Council in April 2020 ('Moorshield Wind Farm'). The site of the Moorshield Wind Farm was smaller than the Moorhouse Farmers Scheme.
12. The consultation responses to the Moorshield Wind Farm application are summarised in the Report of Handling **[Document ERC1]**. Full copies of all consultation responses are also included with this application **[Documents CON1 to CON12]**. The only objection to the application was from Glasgow Prestwick Airport (GPA) **[Document CON6]**. They objected on the basis that the proposed wind turbines would result in an unacceptable impact on GPA infrastructure, and that an acceptable mitigation scheme had not been agreed with them to overcome this issue.
13. Planning permission for Moorshield Wind Farm was refused in October 2022 **[Document ERC2]** on the following grounds:-
  - (1) *The proposed development is contrary to Policies D1 and E2 of the adopted East Renfrewshire Local Development Plan 2 (LDP2) as it would have an adverse visual impact on the site and surrounding area. The proposed wind farm is considered to be dominant and prominent at this location and its impact is considered to be locally significant.*
  - (2) *The proposal is contrary to Policy D22 of the adopted East Renfrewshire Local Development Plan 2 (LDP2) as the applicant has not adequately demonstrated: (1) that the proposal will not cause a significant adverse impact on the safety and efficiency of Glasgow Prestwick's air traffic service; or (ii) that a mitigation agreement has been entered into, and a feasibility assessment confirms, that the agreed technical solution*



*has the capability of mitigating the development in respect of Glasgow Prestwick airport's air traffic service.*





## 3.0 The Proposed Development

### 3.1 Introduction

14. This chapter provides a description of the site and the Proposed Development. This site and description of the development is the same as that submitted in the previous planning application for Moorshield Wind Farm.

### 3.2 Site Location and Description

15. The application site is located at the B764 Moor Road, Kirkhill, East Renfrewshire, approximately 6 km southwest of Eaglesham and 10 km northeast of Stewarton, East Ayrshire on the northern side of the B674. The site is entirely within the administrative boundary of East Renfrewshire Council. The location of the site is shown on **Figure 1**.
16. The site extends to approximately 15.22 hectares (ha) and falls within the ownership of four separate farm units: Shieldhill Farm; East Moorhouse Farm; Bonnyton Moor Farm; and South Moorhouse Farm. The closest residential properties to the proposed turbines are: Shieldhill farmhouse (which has a financial interest in the development) at approximately 420 m to the west of the southern-most turbine; Highfield at approximately 1.2 km to the west of the north-western-most turbine; Bennan farmhouse at approximately 1.7 km to the north of the north-western-most turbine; and Greenfield at approximately 2 km to the east of the eastern-most turbine.
17. The site mainly comprises of rough grazing agricultural land and is relatively flat. Elevations across the site vary between 275 m above ordnance datum ('AOD') at the site access point in the south of the site, to 260 m AOD close to the location of the northern most turbine, to 290 m AOD in the north-east of the site.
18. Outwith the site, forestry plantations are located to the west and north of the site, and Benn Loch Reservoir located to the northeast. The operational Whitelee Wind Farm and its associated extensions are located south of the B764 Moor Road, approximately 1.27 km from the nearest proposed turbine.

### 3.3 The Proposed Development

19. The Proposed Development would comprise the following principal components:
  - three wind turbines, each with a maximum blade tip height of up to 149.9 m;
  - turbine foundations at each wind turbine;
  - hard standings adjacent to each wind turbine, including crane pads;
  - underground electrical cabling;
  - a substation control building and compound;
  - access tracks, including one new watercourse crossing and new site entrance from the B674 Moor Road; and
  - a temporary construction compound and laydown area.
20. The layout of the Proposed Development is shown on **Figure 2**. It is requested that the precise locations of the proposed wind turbines and other infrastructure may be micrositied within 50 m from the locations shown on this figure. 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



requiring all micro-siting to be agreed in advance with the Planning Authority in consultation with SEPA is proposed.

### **3.3.1 Wind Turbines**

21. A range of wind turbine models may be suitable for the site, and the final choice of wind turbine model would be selected through a competitive procurement process. As there is an uncertainty relating to which wind turbine model would be used at the time of construction, this application requests a reasonable degree of flexibility for the permissible dimensions of the wind turbine. A planning condition requiring details of the final wind turbine dimensions to be submitted and approved by the Planning Authority prior to the commencement of development is requested. However, based upon a maximum blade tip height of 149.9 m, it is anticipated that the installed nominal capacity of each wind turbine will be approximately 5 megawatts (MW).

### **3.3.2 Ancillary Infrastructure**

22. Wind turbine foundation construction design will be finalised at the detailed design engineering stage following selection of the final wind turbine to be used for construction.
23. A crane hardstand of approximately 25 m by 62 m will be required adjacent to each wind turbine foundation, to provide a stable base for construction and crane erection activities. These crane hardstand areas will be permanently retained for maintenance operations.
24. The site would be accessed from the B674 Moor Road via a new site entrance. The new site entrance will be designed to accommodate deliveries for wind turbine components. New access track will be required on site to access the wind turbines. This will require the formation of one new watercourse crossing.
25. The electricity produced by the wind turbines will be fed to a control building within the substation compound. The control building will measure approximately 15 m x 7 m x 5 m high and will be located near to the entrance to the site. In addition, the substation compound will house external electrical equipment, a control building for the transmission operator and a shared welfare building. The substation compound will be approximately 355 m<sup>2</sup>.
26. For construction purposes, a temporary construction compound will be required. The compound would measure approximately 70 m by 45 m and will provide space for materials storage, site office cabins and welfare facilities as well as spaces for staff and visitor parking. The compound will also be used for refuelling. The land would be reinstated at the end of the construction phase.

### **3.3.3 Construction Phase**

27. It is anticipated that construction activities for the Proposed Development would take approximately six to nine months, depending upon seasonal working and weather conditions.
28. In general, hours of working during the construction period will be from 07:00 to 19:00 Monday to Saturday. No working is proposed on Sundays or public holidays. No audible works, with the exception of wind turbine delivery and the completion of wind turbine erection or emergency work, will take place outside these hours, and any such out-of-hours works will be subject to prior agreement with the Planning Authority.
29. It is anticipated that wind turbine components would be delivered via the same route as per Whitelee Wind Farm, with access to the site itself from the north side of the B674 Moor Road.



### 3.3.1 Operational Phase

30. It is anticipated that the Proposed Development would have an operational life of up to 30 years. A wind farm is typically visited between two to four times a year by a small maintenance crew. There would also be a requirement for maintenance of the access tracks and substation.

### 3.3.2 Decommissioning Phase

31. At the end of the operational life, the Proposed Development would be decommissioned. Alternatively, a new planning application may be submitted to repower the proposed development.
32. The ultimate decommissioning approach would be agreed with the Planning Authority and other appropriate regulatory authorities in line with best practice guidance and requirements of the time. This would be done through the preparation and agreement of a Decommissioning and Restoration Plan. Financial provision for the decommissioning would be provided for.



## 4.0 Benefits of the Proposed Development

### 4.1 Renewable Electricity Generation

33. The Scottish Government published the updated Onshore Wind Policy Statement (OWPS) in December 2022. The OWPS sets a target for a minimum installed capacity of 20 GW of onshore wind by 2030. The scale of development needed to meet this 20 GW is notable given that it has already taken over 20 years to develop 8.7 GW of onshore wind.
34. The Proposed Development would have an anticipated nominal capacity of approximately 15 MW. The project has a high capacity factor of 36.5% and therefore annual generation from these wind turbines is estimated at approximately 50,000 megawatt hours (MWh) of electricity annually. The project also has a 2024 grid connection date which means that it will contribute to the OWPS 2030 target.
35. Based upon this predicted annual electricity generation and the most recent energy statistics provided by the Department of Business, Energy and Industrial Strategy (BEIS) which identify that average UK domestic household consumption is 3,509 kWh per annum, it is estimated that the proposed wind turbines will supply renewable electricity equivalent to the current annual domestic needs of approximately 14,249 households.

### 4.2 Effect on Greenhouse Gas Emissions

36. Scotland is legally bound through the Climate Change (Scotland) Act (2009) to reduce carbon emissions to net zero by 2045, with interim targets to reduce emissions by 56% by 2020, 75% by 2030 and 90% by 2040. A series of annual targets towards this net zero and interim target have also been set. These annual targets between 2020 and 2030 require a near doubling of the response to the targets that were set for the period up to 2020. Given these annual targets up to 2020 were missed, the scale of change required over this decade to achieve these targets is significant.
37. Each unit of renewable electricity generated by the Proposed Development will displace a unit of conventionally generated electricity, thereby displacing carbon dioxide emissions. Based on the predicted annual electricity generation figure of 50,000 MWh, the Proposed Development is expected to displace approximately 23,000 tonnes of carbon dioxide per year.

### 4.3 Peatland Restoration and Enhancement

38. As identified in the Biodiversity and Natural Heritage Appraisal Report (**Appendix 2.5**), it is proposed to restore blanket bog habitat within the application site through ditch blocking. The report identifies that the ditch-blocking programme would aim to block ditches and re-wet an area of at least the same size of the total area of blanket bog that would be lost as a consequence of the Proposed Development, this equating to approximately 0.37 hectares.
39. In an update to the Biodiversity and Natural Heritage Appraisal Report, it is now confirmed that the Applicant would be willing to work with the landowners to undertake peatland restoration over an area twice the extent of the peatland area that would be affected by the Proposed Development. This would equate to a proposed peatland restoration and enhancement area of approximately 0.74 hectares. It is proposed that further details of this peatland restoration and enhancement would be provided in a Habitat Management and Enhancement Plan which would be produced and agreed post consent with the Planning Authority, in consultation with NatureScot, prior to the commencement of development. The requirement for a Habitat Management and Enhancement Plan could be secured through an appropriately worded planning condition.



## 4.4 Socio-Economic Benefits

40. It is anticipated that the construction of the Proposed Development will directly support an estimated 9 job years (one job year is the equivalent of one person being employed full time for a year) in the local area and an estimated additional 11 job years in Scotland. The 30 year operational phase of the Proposed Development will direct support an estimated further 1-2 full time equivalent jobs locally and a further 1-2 full time equivalent jobs with Scotland. Indirectly, the Proposed Development may also create further employment opportunities down the supply chain for those companies providing services to the contractors during the construction and decommissioning phases of the development.

## 4.5 Community Benefits and Shared Ownership

41. The Applicant is committing to an overall benefits package of £5,000 per MW per annum of installed wind capacity, index-linked, in line with the Scottish Government's recommended rate. This will be payable for the lifetime of the project, expected to be 30 years. This could amount to a total of £75,000 per year, or over £2.25 million for the lifetime of the project.
42. In addition to the Community Benefit Package, the Applicant is also exploring opportunities for the local community to invest in the Proposed Development, whereby the community would receive up to five percent of the project net profit after tax in return for their investment.
43. It is acknowledged that community benefits are not a material consideration in the assessment of the Proposed Development and are therefore not discussed in any further detail in this Planning Statement. However, it is considered that the associated socio-economic benefits that this investment in the local area may generate should be considered material in the assessment of the Proposed Development.



## 5.0 Planning Policy Assessment

### 5.1 Introduction

44. The primacy of the Development Plan in determining planning applications is established by Sections 25 and 37 of the Town and Country Planning (Scotland) Act 1997 (as amended) ('the 1997 Planning Act'). These provisions require decision makers to determine planning applications in accordance with the Development Plan unless material considerations indicate otherwise.
45. This chapter of the Planning Statement assesses the Proposed Development against the relevant provisions of the Development Plan and other relevant material considerations. The focus of this assessment is on the new Development Plan policies against which this repeat application should be assessed. These include National Planning Framework 4 (NPF4) which now gives the climate emergency and the nature crisis overriding significance in all planning decisions and identifies that localised significant landscape and visual effects from onshore wind farm development should generally be acceptable. Specific consideration is also given in this assessment to the policy matters (visual impact and airport safeguarding) that were cited with the objections to and reasons for refusal of the previous application (2020/0217/TP).
46. Section 24 of the 1997 Planning Act as amended by Section 13 of the Planning (Scotland) Act 2019 provides that in the event of any incompatibility between the provision of the National Planning Framework and a provision of the Local Development Plan, whichever of them is the later in date is to prevail. That includes where a Local Development Plan is silent on an issue that is now provided for in NPF4.

### 5.2 National Planning Framework 4

47. NPF4 was adopted in February 2023 and replaced previous national planning policy which was contained in NPF3 and Scottish Planning Policy (SPP). In presenting the document to the Scottish Parliament, Tom Arthur MSP (the former Minister for Public Finance, Planning and Community Wealth) emphasised the significance of the change NPF4 brings to the Scottish planning system. He stated:

*"It has been suggested that the fourth national planning framework represents the biggest change to our approach to planning in Scotland in 75 years. Indeed, NPF4 marks a turning point for planning: it is not a general policy update; it is about change and planning with courage and determination to make some of the difficult decisions that may lie ahead.*

*We have had the 75th anniversary of the Town and Country Planning (Scotland) Act 1947, which gave birth to our modern planning system. NPF4 is the biggest change that we have seen to our planning system since then, and it will change the wellbeing of our people, our businesses, our places and our communities. It will help to make Scotland a fairer, greener and more prosperous country. I hope that members will vote to approve it. In doing so, they will give a resounding statement from Scotland's Parliament about how we embrace change and plan places for the future."*

#### 5.2.1 The National Spatial Strategy for Scotland 2045

48. Part 1 of NPF4 sets out the overarching spatial strategy for Scotland to 2045 and includes six spatial principles that are to influence all future plans and decisions, these being:
  - Just transition;
  - Conserving and recycling assets;



- Local living;
- Compact urban growth;
- Rebalanced development; and
- Rural revitalisation.

49. The introductory text to the spatial strategy on page 3 of NPF states that:

*"The world is facing unprecedented challenges. The global climate emergency means that we need to reduce greenhouse gas emissions and adapt to the future impacts of climate change. We will need to respond to a growing nature crisis, and to work together to enable development that addresses the social and economic legacy of the coronavirus pandemic, the cost crisis and longstanding inequality."*

50. By applying the spatial strategy, NPF4 identifies that it will support the planning and delivery of:

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

51. Page 6 of NPF4 specifically addresses the creation of sustainable places. It references the impacts of climate change, and states that:

*"Our climate is changing, with increasing rainfall, extreme weather events and higher temperatures that will intensify in the coming years. This will increase flood risk, water scarcity, environmental change, coastal erosion, impact on forestry and agriculture, and generate risks to health, food security and safety. Impacts will not be equal and communities who already face disadvantage will be particularly affected."*

52. To help tackle the impacts of climate change, NPF4 states that *"Scotland's Climate Change Plan, backed by legislation, has set our approach to achieving net zero emissions by 2045, and we must make significant progress towards this by 2030."* **The Proposed Development can make a significant positive contribution toward net zero targets through the generation of renewable electricity that could displace the emission of approximately 23,000 tonnes of carbon dioxide each year that would otherwise be emitted should the equivalent amount of electricity be generated from a fossil fuel mix. This positive aspect of the Proposed Development is augmented by the fact that only a relatively small area of peat and peatland habitat will be affected by the proposals and by the benefits that the Proposed Development would deliver towards peatland restoration and enhancement through the proposed Habitat Management and Enhancement Plan.**

53. Page 7 of NPF4 sets out the Scottish Government's vision and strategy for the delivery of sustainable places. It 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."*

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



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

54. **The Proposed Development can make a positive and valuable contribution towards the delivery of sustainable places through the generation of renewable energy and the proposed peatland enhancement.**
55. Page 8 of NPF4 addresses cross-cutting outcomes and policy links. It states that *"the global climate emergency and the nature crises have formed the foundations for the spatial strategy as a whole"*, therefore explicitly recognising that for the first time these are now the two key drivers of national planning policy. **As previously outlined, the Proposed Development can make a significant contribution towards both these drivers through the generation of renewable energy and the proposed peatland enhancement.**

## 5.2.2 National Developments

56. Eighteen national developments are identified in total in NPF4. These are defined as *"significant developments of national importance that will help to deliver our spatial strategy"*.
57. NPF4 identifies that *"national development status does not grant planning permission for the development"* but does clarify that *"their designation means that the principle of the development does not need to be agreed in later consenting processes."*
58. Annex B of NPF4 provides further details and Statements of Need for each of the eighteen national development. National Development 3 is for Strategic Renewable Electricity Generation and Transmission Infrastructure, for which NPF4 states that:

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

*A large and rapid increase in electricity generation from renewable sources will be essential for Scotland to meet its net zero emissions targets. Certain types of renewable electricity generation will also be required, which will include energy storage technology and capacity, to provide the vital services, including flexible response, that a zero carbon network will require.*

*Generation is for domestic consumption as well as for export to the UK and beyond, with new capacity helping to decarbonise heat, transport and industrial energy demand. This has the potential to support jobs and business investment, with wider economic benefits."*

59. National Development 3 is identified as being applicable to the whole of Scotland and is one of six national developments which are identified as supporting the delivery of sustainable places.
60. The Statement of Need for National Development 3 states that:
- "Additional electricity generation from renewables and electricity transmission capacity of scale is fundamental to achieving a net zero economy and supports improved network resilience in rural and island areas."*
61. With regard to onshore electricity generation, Appendix B identifies that only onshore wind farms with a capacity exceeding 50 MW would qualify as being classified as of national development status under National Development 3. **Although the Proposed Development does not therefore qualify as a national development, it is considered that the inclusion of**





**renewable energy projects as national development clearly establishes beyond any reasonable doubt the strengthened need case for more onshore wind energy development.**

### 5.2.3 National Planning Policy

62. Part 2 of NPF4 sets out national planning policy for Scotland by topic under the themes of 'Sustainable Places', 'Liveable Places' and 'Productive Places'.

63. In terms of the application of these national planning policies, page 98 of NPF4 states that:

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

64. With regard to Local Development Plans, NPF4 is clear that the focus of these should be on land allocation through the spatial strategy and interpreting national policy in a local context. It states:

*"There is no need for LDPs to replicate policies within NPF4, but authorities can add further detail including local specific policies should they consider to be a need to do so, based on the area's individual characteristics."*

65. The lead national planning policies for the determination of the Proposed Development are considered to be NPF4 Policies 1 and 11. These policies are therefore considered first, with other policies considered pertinent to the determination of this repeat application considered thereafter. As identified above, the weight to be given to each individual policy is a matter for the decision maker.

#### 5.2.3.1 Policy 1: Tackling the Climate and Nature Crisis

66. All of the national planning policies within NPF4 are underpinned by Policy 1, an overarching policy which states that that *"when considering all development proposals that significant weight will be given to the global climate emergency and nature crises."*

67. **As previously outlined, the Proposed Development can make a significant contribution towards both the global climate emergency and the nature crises through the generation of renewable energy and through the proposed peatland restoration and enhancement.**

68. **The introduction of Policy 1 represents a fundamental rebalancing of the planning system compared to the previous position in NPF3 and SPP, with the climate emergency and nature recovery now to be given overriding significance in all planning decisions. Whilst it was previously open to decision makers to give such weight as they thought appropriate to the global climate emergency, Policy 1 is entirely new in that it is now a matter of policy that decision makers give significant weight to the global climate emergency and nature crises.**

69. **Whilst there was some debate in earlier drafts of the NPF4 regarding potential conflict between this overarching policy and other policy objectives, in his update to the Scottish Parliament on the Revised Draft NPF4, Tom Arthur MSP clarified that when considering the weighting to be applied to different policies in NPF4 that *"the climate and nature crises are the priority"*.**

70. **Overall, it is therefore concluded that the Proposed Development accords with and draws significant policy support from Policy 1.**



### 5.2.3.2 Policy 11: Energy

71. The intent of Policy 11 is to encourage, promote and facilitate all forms of renewable energy development, and the policy outcome is identified as the expansion of renewable, low carbon and zero emission technologies. This further demonstrates the increased policy support that NPF4 now provides for renewable energy development compared to NPF3 and SPP.
72. Policy 11 part (a) makes clear that all types of renewable energy are supported in principle, with part (b) identifying the only exception to this policy support is wind farm developments in National Parks and National Scenic Areas. **The location of the Proposed Development outwith these nationally designated areas confirms that the proposal is effectively in a preferred area for wind farm development.**
73. Policy 11 part (c) identifies that renewable energy proposals will only be supported where they maximise net economic impact, including local and community socio-economic benefits. **As identified in Chapter 3 of this Planning Statement, the Proposed Development will deliver a range of positive socio-economic benefits. The Applicant acknowledges the importance of employing good practice measures in maximizing local procurement, taking into consideration resources such as the Renewables UK Good Practice Guidance 2014: 'Local Supply Chain Opportunities in Onshore Wind' (RenewablesUK, 2014). The Applicant also recognises the value of building upon recent UK best practices in innovative local procurement, which may include implementing a Local Contractor Policy. In this regard, primary contractors that demonstrate a clear commitment to increasing local content in their supply chains may receive additional consideration in the tendering process.**
74. **These socio-economic benefits have been maximized through optimising the scale and electricity generation output of the development whilst giving careful consideration to potential environmental impacts. It is therefore considered that the Proposed Development satisfied Policy 11 part (c).**
75. Policy 11 part (d) relates to impacts on international and national natural heritage designations. **The Biodiversity and Natural Heritage Report (Appendix 2.5) establishes that there would be no significant impacts on any such designations as a result of the Proposed Development. The NatureScot consultation response [Document CON5] to the previous application supports this conclusion.**
76. Policy 11 part I sets out the matters that are to be addressed in the design and mitigation of a renewable energy development. Each of these matters are considered in turn below. In accordance with Policy 1, Policy 11 part I provides that when considering impacts upon these matters that *"significant weight will be placed on the contribution of the proposal to renewable energy generation targets and on greenhouse gas emissions reduction targets."*

#### (ii) Impacts upon Communities and Residential Dwellings

##### Residential Visual Amenity

77. **An assessment of residential visual amenity is provided in Table 1.7 of the LVA (Appendix 2.1). The assessment establishes that none of the proposed turbines would be seen as overbearing at any nearby properties with the exception of the property at Shieldhill. The owner of Shieldhill is financially involved in the Proposed Development. For this reason, the impact on Shieldhill is considered acceptable.**

##### Noise

78. **The Noise Impact Assessment (Appendix 2.4) establishes that both the construction and operational phases of the Proposed Development would not result in any unacceptable noise and vibration impacts upon the amenity of any nearby residential properties. The**



Report of Handling [Document ERC1] for the previous application supports these conclusions, identifying that noise impacts could be adequately controlled through suitable planning conditions.

79. The wording of a proposed planning condition that has been agreed with the owner of the neighbouring Whitelee Wind Farm development and its associated extensions to ensure that cumulative noise effects are within appropriate noise level limits and do not unfairly disadvantage these schemes should any noise investigation of the Proposed Development occur is provided in the Hayes McKenzie note (Appendix 5). If planning permission is granted for the Proposed Development, the Applicant requests that this condition be attached to the consent.

#### Shadow Flicker

80. The Shadow Flicker Assessment (Appendix 2.7) establishes that any potential shadow flicker effects because of the Proposed Development could be mitigated and adequately controlled through planning conditions. The Report of Handling [Document ERC1] for the previous application supports this conclusion.

#### (ii) Landscape and Visual Impacts

81. Before considering the landscape and visual effects of the Proposed Development in the Planning Statement, it is important to consider the significant siting and design effort that has been undertaken by the Applicant to minimise any significant adverse landscape and visual impacts as a result of the proposals.
82. The design objectives for the Proposed Development are detailed in Table 1.6 of the supporting Landscape and Visual Appraisal (LVA) (Appendix 2.1). These objectives took into account the Reporter's feedback in relation to the previous Moorhouse Farmers and Soame Schemes. As a result, the number of turbines has been significantly reduced from these previous schemes down to three turbines to achieve a simple, compact and coherent layout. Other benefits of the layout of the Proposed Development over the previous schemes include:
- removal of turbines from the higher ground and rolling landform of Ballageich Hill, thereby reducing the effects on the local landscape character as well as reducing wider visibility of the turbines;
  - the proposed turbines are now sited within a discrete local landscape character area which is identified in the East Renfrewshire Wind Energy Study as having landscape capacity to accommodate wind turbines;
  - increased separation of turbines from the M77 and B764 Moor Road, thereby reducing the visual effect of the turbines to users of these roads;
  - increased separation of the turbines from Highfield (the nearest non-financially involved property to the Proposed Development), thereby further reducing the potential for adverse impacts upon residential amenity;
  - increased separation of turbines from Bennan Loch, thereby reducing the influence of the Proposed Development on the landscape of Bennan Loch and its immediate environs.
83. The residual landscape and visual effects of the Proposed Development taking into account the above embedded design mitigation are assessed in Sections 8 and 9 of the LVA.
84. In relation to landscape effects, the LVA concludes that given the combination of the



Proposed Development's setting within the context of the existing Whitlee Wind Farm, the characteristics of the plateau moorland with wind farms landscape within which it is located, and the medium to large scale of this receiving landscape, that the landscape has the capacity to accommodate the proposal.

85. In relation to visual effects, the LVA establishes that the siting and design of the proposed turbines means that the visual effects of the Proposed Development would be concentrated within a localised areas of approximately 5 km from the site. This localised area is relatively sparsely populated. The main visual impacts of the Proposed Development would therefore be on users travelling along roads and paths within the area local to the site. The key routes assessed in this regard are the M77 and the B764 Moor Road, with a summary of these impacts provided below.
86. Travelling northbound on the M77 for a 4.5 km section of route between the A719 overbridge and Floak Quarry, the LVA identifies that the proposed turbines would be viewed either directly ahead or obliquely at close distances and would be visible alongside the existing Whitlee Wind Farm. It concludes that the nature of these visual effects would be no worse than Minor – Moderate.
87. Travelling southwest bound on the B764 Moor Road, the LVA identifies that for a 2 km section of route at Queenseat Hill that the proposed turbines would be visible obliquely. It concludes that the nature of these visual effects would be Moderate.
88. The Planning Officer in his Report of Handling [Document ERC1] for the previous application concluded that the localised landscape and visual impacts of the Proposed Development - in particular the views from the M77 northbound and the B674 Moor Road southwest bound - were sufficient grounds to warrant refusal of the proposals. However, it is noted that this assessment was made in the context of the now revoked SPP. NPF4 Policy 11(e)(ii) now specifically recognises in policy that significant landscape and visual impacts are to be expected for onshore wind energy developments and states that *"where impacts are localised and/or appropriate design mitigation has been applied, they will generally be considered to be acceptable."* This is a clear policy shift from the national planning policy position that was in place at the time of determination of the previous application. On the basis that the landscape and visual impacts of the Proposed Development will be localised in extent, it is considered in the revised policy context provided by NPF4 that they should now be considered acceptable.
89. Even if the Planning Authority considers that the landscape and visual impacts of the Proposed Development not to be localised in spatial extent and therefore generally acceptable, it is considered that the Proposed Development satisfies Policy 11(e)(ii) since appropriate design mitigation has been applied to minimise the landscape and visual impact of the proposals.

### (iii) Public Access

90. There are no public rights of way or core paths within the application site. General access rights to the site under the Land Reform (Scotland) Act 2003 will require to be temporarily suspended on land while construction work is being carried out. This suspension will only apply to areas where construction operations are active rather than the whole of the site and will be kept to the minimum area and the minimum duration that is reasonable.
91. It is proposed that a planning condition could be applied to the Proposed Development to ensure that suitable public access within the site is safeguarded during construction and thereafter that suitable public access is provided during the operational phase of the development.



**(iv) Aviation and Defence Interests**

92. The Ministry of Defence has previously confirmed through its consultation response to the previous application [Document CON4] that it has no objection to the Proposed Development.
93. The Applicant has entered into an agreement with NATS (En-Route) plc (NERL) to provide a Primary Radar Mitigation Scheme in order to mitigate the impact of the Proposed Development on the primary radar installation at Lowther Hill, Glasgow Airport and Cumbernauld and associated air traffic management operations. NERL has confirmed in its consultation response [Document CON 12] to the previous application that it would have no objection to the Proposed Development subject to the imposition of two suspensive conditions regarding the submission, approval and subsequent implementation of the proposed Primary Radar Mitigation Scheme. The Applicant confirms that the wording of the proposed conditions would be acceptable to them.
94. Glasgow Airport [Document CON 11] has also previously confirmed that it has no objection to the Proposed Development providing that any planning permission is subject to the imposition of three suspensive planning conditions. In summary, the proposed conditions provide that a radar mitigation scheme must be submitted and approved prior to the commencement of development, and that the Proposed Development must be erected and operated in accordance with the approved scheme. The Applicant confirms that the wording of the proposed planning conditions would be acceptable to them.
95. Glasgow Prestwick Airport (GPA) [Document CON6] have previously objected to the Proposed Development on the basis that the proposed turbines will be visible to the radar as “clutter” on their radar screen, resulting in a detrimental effect on the operations of Air Traffic Control. This objection from GPA formed the basis for the second reason for refusal of the previous application.
96. For the reasons set out in the Applicant’s response to the GPA objection [Document APP6], the Applicant disputes that the proposed wind turbines would result in any unacceptable impacts on GPA infrastructure that would require mitigation. Notwithstanding this conclusion, should there be any doubt on this matter the letter also identifies - based upon independent assessment by Helios (Appendix 3) - why it is considered highly likely that a technically and commercial mitigation solution is capable of being identified and implemented well within the lifetime of a planning permission for the Proposed Development. On that basis, the letter sets out why it would be reasonable for the Planning Authority to permit the Proposed Development subject to the imposition of suspensive conditions similar to those proposed by Glasgow Airport. The precise wording of these proposed conditions is set out in the letter (Appendix 6). The Applicant confirms that the wording of the proposed conditions would be acceptable to them.
97. There are two recent decisions issued by Scottish Ministers – for Sanquhar II Community Wind Farm [Document APP9] and Clauchrie Wind Farm [Document APP10] – which fully support the imposition of suspensive conditions in situations similar to those expected to be raised by GPA for the Proposed Development. As detailed in the Applicant’s further response on this matter [Document APP8], these recent decisions demonstrate that the appropriateness of such a condition does not turn on the question of whether a commercial agreement has been entered into between the Applicant and GPA.
98. Overall, it is concluded that subject to the proposed conditions that the Proposed Development would not give rise to any significant issues on the safety of aviation and defence interests.



#### **(v) Impacts on Telecommunications and Broadcasting Installations**

99. On the basis of pre-application consultation with network operators, it is concluded that the Proposed Development will have no effect on any telecommunications, broadcasting or transmission link interests. In the unlikely event that issues do arise, it is a matter that may be mitigated.

#### **(vi) Impacts on Road Traffic and Trunk Roads**

100. The route to the application site for the Proposed Development would be as per the operational Whitelee Wind Farm, with access to the site itself from the north side of the B764 Moor Road.
101. East Renfrewshire Council's Roads Department [Document CON7] have previously confirmed that they had no objection to the Previous Moorshield Scheme on road traffic and safety grounds subject to a condition to ensure that surface water run-off is retained within the site. The Applicant would be willing to accept a suitably worded planning condition on this matter.

#### **(vii) Impacts on the Historic Environment**

102. There are no designated historical features on the site. The requirement to prepare and implement a programme of archaeological works prior to the commencement of development would ensure the protection or recording of any unknown archaeological features on the site.
103. Historic Environment Scotland (HES) [Document CON3] have previously identified that the Proposed Development has the potential to affect the Dunwan Hill Fort Scheduled Monument, which is located approximately 2.5 km south-east of the site. However, they have confirmed that they are satisfied that the effect on the setting of this asset does not warrant an objection to the Proposed Development.

#### **(viii) Effects on hydrology, the water environment and flood risk**

104. The Hydrology Assessment (Appendix 2.3) identifies good practice measures that would be applied in relation to pollution risk, sediment management and management of surface run off rates and volumes. Such measures would be included in the Construction Environment Management Plan (CEMP), and the Applicant would employ an Environmental Clerk of Works (EnvCoW) to oversee and implement these measures.
105. The Hydrology Assessment established that the addition of the new access tracks and hardstanding areas should not result in any unacceptable flood risk.
106. The Proposed Development is located within a Drinking Water Protection Area (DWPA) for surface water. To ensure that this DWPA will not be adversely impacted by the Proposed Development, a planning condition requiring adoption of a water quality monitoring programme both prior to and during construction is proposed.
107. Overall, it is therefore concluded, taking into account the proposed mitigation which could be secured by planning conditions, that the Proposed Development would not result in any unacceptable impacts upon hydrology, the water environment or flood risk.

#### **(ix) Biodiversity**

108. The Proposed Development does not lie within any statutory nature conservation designations. The NatureScot response to the Previous Moorshield Scheme supports the conclusions of the Biodiversity and Natural Heritage Appraisal Report (Appendix 2.5) that



there would be no significant effects on any statutory nature conservation designations outwith the site as a result of the proposals.

109. The Biodiversity and Natural Heritage Appraisal Report identifies pre-construction and construction mitigation measures to be implemented to ensure that the construction of the Proposed Development avoids potential adverse impacts upon protected species and birds. Full details of these mitigation measures would be included in the proposed CEMP, with the Applicant employing an EnvCoW to oversee and implement these measures.
110. The construction of the Proposed Development would result in the permanent loss of approximately 1.39 hectares of habitat. This includes the permanent loss of approximately 0.39 hectares of blanket bog habitat. As identified in Chapter 4 of this Planning Statement, the Applicant is proposing to restore approximately twice the area of the peatland habitat that would be affected by the Proposed Development to compensate for its loss as well as to provide biodiversity enhancement. It is considered that the agreement of a Habitat Management and Enhancement Plan by planning condition can seek to ensure that a suitable level of positive biodiversity compensation and enhancement is provided by the Applicant.
111. Overall, taking into account the proposed mitigation, it is therefore concluded that the Proposed Development would not result in any significant adverse effects on biodiversity and that planning conditions can ensure that a suitable level of biodiversity enhancement is provided by the Applicant.

**(x) Impacts on Trees, Woods and Forests**

112. No unacceptable impacts upon trees, woods and forests are predicted as a result of the Proposed Development.

**(xi) Proposals for Decommissioning:**

113. As identified in Chapter 3 of this Planning Statement, a Decommissioning and Restoration Plan would be agreed with the Planning Authority prior to the commencement of decommissioning. Such a plan and a financial guarantee to secure decommissioning and site restoration can be secured by planning conditions.

**(xii) Site restoration**

114. Details of any proposed site restoration works post construction would be included in the CEMP, and the Applicant would employ an EnvCoW to oversee these restoration works.
115. As identified, details of any restoration works post decommissioning would be included in a Decommissioning and Restoration Plan, the requirement for which can be secured by planning conditions.

**(xiii) Cumulative impacts**

116. While there would be some cumulative landscape and visual effects experienced due to the proximity of the Proposed Development to Whitelee and Middleton wind farms, the LVA (Appendix 2.1) concludes that the addition of the Proposed Development would not exceed the cumulative capacity of the Plateau Moorland with Wind Farms landscape, nor would it become the dominant characteristic of the landscape within the 10 km study area for the cumulative assessment. It identifies that this is largely due to the compact group of three turbines, relative to the scale and character of the receiving landscape, and the existing cumulative baseline of wind farms within the landscape.
117. For the reasons identified earlier, it is considered that the cumulative noise impacts of the



**Proposed Development with other schemes would also be acceptable.**

### **Policy 11 Conclusions**

118. **The Proposed Development is considered to be acceptable in relation to all of the environmental and technical matters identified in Policy 11 part (e).**
119. **Overall, it is therefore concluded that the Proposed Development accords with and draws strong policy support from Policy 11.**

#### **5.2.3.3 Policy 2: Climate Mitigation and Adaption**

120. The intent of Policy 2 is to encourage, promote and facilitate development that minimises emissions and adapts to the current and future impacts of climate change.
121. Policy 2(a) is relevant to the Proposed Development. It requires that development proposals be sited and designed to minimise lifecycle greenhouse gas emissions as far as possible.
122. **As detailed in the Peat Management Plan (Appendix 4), the layout and design of the Proposed Development has sought to avoid the presence of deep peat on the site as far as possible in order to protect its important carbon change function. In addition, through the proposed Habitat Management and Enhancement Plan the Proposed Development would seek to deliver the enhancement of blanket bog habitats on the site. Once this enhancement has succeeded, it will increase the amount of carbon that is sequestered annually. The Proposed Development is therefore considered to be in accordance with Policy 2(a).**

#### **5.2.3.4 Policy 3: Biodiversity**

123. Reflecting the importance of the nature crisis, in addition to seeking to protect biodiversity there is a much greater focus in NPF4 on seeking to improve biodiversity and restore and enhance habitats as far as possible through development proposals.
124. Policy 3(a) states that *"Development proposals will contribute to the enhancement of biodiversity, including where relevant, restoring degraded habitats and building and strengthening nature networks and the connections between them. Proposals should also integrate nature-based solutions, where possible."*
125. Policy 3(c) states that *"Proposals for local development will include appropriate measures to conserve, restore and enhance biodiversity, in accordance with national and local guidance. Measures should be proportionate to the nature and scale of development."*
126. **It is considered that the agreement of a Habitat Management and Enhancement Plan by planning condition can seek to ensure that a suitable level of positive biodiversity improvements are provided by the Applicant in relation to the Proposed Development.**
127. Policy 3(d) requires that any potential adverse impacts of development proposals on biodiversity, nature networks and the natural environment be minimised through careful planning and design.
128. **Careful consideration has been given in the layout and design of the Proposed Development to the considerations identified in Policy 3(d). The success of this approach is demonstrated through the Biodiversity and Natural Heritage Appraisal Report (Appendix 2.5), which establishes that the construction and operation of the Proposed Development will both protect and deliver positive biodiversity effects. This policy requirement is therefore considered to be satisfied.**





### 5.2.3.5 Policy 4: Natural Places

129. The intent of Policy 4 is to ensure that natural assets are protected, restored and enhanced.
130. Policies 4(b) and (c) relate to the protection of nature based designations of international and national importance. **The Biodiversity and Natural Heritage Appraisal Report (Appendix 2.5) concludes that the Proposed Development would not adversely affect the integrity of any of these sites, and NatureScot [Document CON5] have supported this conclusion in their consultation response to the previous application. It is therefore considered that the Proposed Development accords with Policies 4(b) and (c).**
131. Policy 4(d) relates to the protection of local nature conservation sites and local landscape designations. **Whilst the Proposed Development is partly located with the Shieldhill Bog Local Biodiversity Site, the Biodiversity and Natural Heritage Appraisal Report (Appendix 2.5) considers that the proposed peatland restoration and enhancement activities will provide enhancements that will help to support the species for which the Shieldhill Bog Local Biodiversity Site has been designated for. It is therefore concluded that the Proposed Development will not have a significant adverse effect on this designated site and complies with Policy 4(d).**
132. Policy 4(e) relates to the protection of protected species. **The Biodiversity and Natural Heritage Appraisal Report (Appendix 2.5) establishes that the Proposed Development would have no significant adverse impacts upon otter, badger, watervole, bats or any other protected species following the implementation of the proposed mitigation measures. It is therefore considered that the Proposed Development complies with Policy 4(e). NatureScot previously raised no concerns with regards to protected species in their consultation response [Document CON5] to the previous application and it is therefore assumed supports the conclusions of the Biodiversity and Natural Heritage Appraisal Report in this regard.**

### 5.2.3.6 Policy 5: Soils

133. The intent of Policy 5 is to protect carbon-rich soils, restore peatlands and minimise disturbance to soils from development. This is very similar to the previous SPP policy position; however, a key difference is that renewable energy developments that optimise the contribution of the area to greenhouse gas emissions reduction targets are one of the types of development that are now expressly permitted on peat (paragraph c).
134. To ensure that development proposals minimise negative impacts to soils from development to the greatest degree possible, Policy 5(a) sets out the mitigation hierarchy that should be followed. This mitigation hierarchy provides that development proposals should seek to avoid impacts on soils in the first instance. Where this is not feasible, the hierarchical approach then seeks to ensure that negative impacts on peatlands are minimised.
135. **The Peat Management Plan (Appendix 4) details how the location, positioning and orientation of the infrastructure of the Proposed Development has deliberately sought to avoid deep peat as far as possible. This includes specific information on how the location of turbine T2 and its associated access track has been altered in response to concerns from SEPA in relation to deep peat. Where the avoidance of deep peat is not possible, the Peat Management Plan identifies how impacts on peat will be minimised and mitigated, for example through the proposed use of floating roads to access turbine T2. It is therefore considered that the Proposed Development satisfies Policy 5(a).**
136. **Post consent it is proposed that the submitted Peat Management Plan be updated with information obtained during detailed ground investigations to be undertaken and in accordance with the final detailed design. The requirement for a finalised Peat Management Plan to be submitted and approved by the Planning Authority in consultation with SEPA**



**prior to the commencement of development can be secured through a planning condition.**

### 5.2.3.7 Policy 7: Historic Assets and Places

137. The intent of Policy 7 is to protect and enhance the historic environment assets and places, and to enable positive change as a catalyst for the regeneration of places.
- 138. As already identified, HES have previously concluded [Document CON3] that the effect of the Proposed Development on the setting of this Dunwan Hill Fort Scheduled Monument does not warrant an objection to the application. It is therefore considered that the Proposed Development satisfies Policy 7(h).**

### 5.2.3.8 NPF4 Conclusions

139. NPF4 fundamentally rebalances the Scottish Planning system. The national planning framework is no longer set out as the “*spatial expression of the Government Economic Strategy*” as it was in NPF3. Instead for NPF4 the “*global climate emergency and the nature crisis have formed the foundations for the spatial strategy as a whole*”.
140. 2.5.2. For the purposes of the determination of this repeat application, the adoption of NPF4 tilts the planning balance further in favour of the Proposed Development in the following key ways:
- NPF4 now forms part of the statutory Development Plan and is the most recent expression of the Scottish Government’s national planning policy. It should therefore be given a significantly stronger role in decision making on this repeat application than NPF3 and SPP were given in the previous application.
  - It is now a matter of national planning policy (Policy 1) that significant weight should be given to the global climate emergency and nature crisis when considering all development proposals. The matter of weight to be afforded is no longer left at the discretion of the decision maker.
  - It is now a matter of national planning policy (Policy 11) that more weight should be given to the contributions that developments can make towards renewable energy generation and greenhouse gas emissions reductions targets.
  - Onshore wind energy is now expressly supported in all areas except National Parks and National Scenic Areas (Policy 11).
  - National planning policy (Policy 11) now specifically states that localised landscape and visual effects from onshore wind energy developments will generally be acceptable subject to appropriate design mitigation.

## 5.3 East Renfrewshire Local Development Plan 2

141. East Renfrewshire Council formally adopted its Local Development Plan 2 (LDP2) in March 2022. It was therefore written to accord with NPF3 and be consistent with SPP and the Glasgow and Clyde Valley Strategic Development Plan 2017 rather than NPF4.
142. The introductory sections and Spatial Objective 3 of the LDP2 clearly identify the need to move towards a zero carbon place and economy, with Section 5 of the plan identifying the need for the policies in the plan to make a significant contribution towards the Scottish Government target of net-zero emissions of greenhouse gases by 2045. Reference is also made in Section 5 of the plan to the Scottish Government target to meet the equivalent of 100% of electricity demand from renewables by 2030 and the target to provide the equivalent



of 50% of the energy for Scotland's heat, transport and electricity consumption from renewable sources by 2030.

### 5.3.1.1 LDP2 Policy E2: Renewable Energy

143. The primary LDP2 policy for the assessment of the Proposed Development is Policy E2 which specifically relates to renewable energy. Paragraph two of Policy E2 provides that proposals for wind farm developments will be supported in principle by the Planning Authority, but that proposals will be required to demonstrate that they do not result in unacceptable significant adverse effects giving due regard to relevant environmental, community and cumulative impact considerations. The third paragraph of Policy E2 lists the environmental and technical criteria that are to be considered in determining the acceptability of renewable energy proposals.
144. **The environmental and technical criteria in LDP2 Policy E2 against which the acceptability of renewable energy proposals is to be assessed are broadly similar to those which NPF4 Policy 11(e) requires to be addressed via mitigation and design. However, a key difference between LDP2 Policy E2 and NPF4 Policy 11(e) is that the latter states that when considering impacts upon these considerations that "significant weight will be placed on the contribution of the proposal to renewable energy generation targets and on greenhouse gas emissions reduction targets." In other words, the contribution of projects towards renewable energy generation targets and greenhouse gas reduction targets should be given significantly greater weight in the determination of planning applications than LDP2 Policy E2 currently provides. Unlike NPF4 Policy 11(e), LDP2 Policy E2 also fails to recognise that some significant landscape and visual effects are to be expected for onshore wind farms development, and that where such effects are localised that they should generally be considered acceptable. It is therefore considered that LDP2 Policy E2 is not compatible with NPF4 and that as a result of these incompatibilities the provisions of NPF4 should prevail.**
145. **Notwithstanding the above incompatibilities, given the findings of the environmental and technical assessments submitted in support of this application as well as the findings of the appraisal against NPF4 Policy 11(e) in Section 5.2.3.2 of this Planning Statement, the Proposed Development is considered to be acceptable in terms of all the factors identified in LDP2 Policy E2.**

### 5.3.1.2 LDP2 Policy D3: Green Belt and Countryside Around Towns

146. Policy D3 relates to development in the countryside around towns (CAT). It states that development in the CAT will be strictly controlled and limited to that which is required and appropriate to the rural location. Proposals will be required to demonstrate that they are appropriate in terms of scale, size, design, layout and materials to their rural location and compatible with adjoining and neighbouring land uses. It goes on to state that development in the CAT will be supported in principle where it is for agriculture; forestry; equestrian; countryside recreation and active travel; outdoor leisure and tourism; economic and farm diversification; and renewable energy.
147. **The Proposed Development is for a renewable energy development and is therefore permitted within the CAT. Careful consideration has been given in the development of the proposals to the scale, size, design and layout of the Proposed Development and it is considered that the final layout and design as submitted in this application is appropriate to its location. The Proposed Development is therefore considered to comply with LDP2 Policy D3.**
148. **It is noted that the reasons for refusal of the previous application [Document ERC2] and the Report of Handling [Document ERC1] make no reference to LDP2 Policy D3. It is therefore assumed that the Planning Authority was in agreement that the Proposed Development is**



**compliant with LDP2 Policy D3.**

### 5.3.1.3 LDP2 Policy D7: Natural Environment Features

149. Policy D7 states that the Council will protect and enhance the natural environmental features set out in Schedule 5, which includes Local Biodiversity Sites.
150. **For the reasons set out earlier in Section 5.2.3.5 of this Planning Statement in relation to NPF4 Policy 4(d), it is concluded that the Proposed Development will not have a significant adverse effect on Shieldhill Bog Local Biodiversity Site. No unacceptable impacts are predicted upon any other natural heritage features. It is therefore concluded that the Proposed Development is compliant with LDP2 Policy D7, a conclusion supported by the Planning Officer in his Report of Handling [Document ERC1] for the previous application.**

### 5.3.1.4 LDP2 Policy D22: Airport Safeguarding

151. Policy D22 relates to airport safeguarding and states that proposals which interfere with visual and electronic navigational aids and/or increase bird hazard risks will be resisted unless accompanied by specific and agreed mitigation measures.
152. **For the reasons set out earlier in Section 5.2.3.4 of this Planning Statement in relation to NPF4 Policy 11(e), it is considered that impacts upon Glasgow Airport, Glasgow Prestwick Airport and NERL operations can be addressed via suspensive planning conditions requiring the agreement and implementation of appropriate radar mitigation schemes prior to development taking place. On this basis, it is considered that the Proposed Development is compliant with LDP2 Policy D22.**

### 5.3.1.5 LDP2 Policy E4: Protecting Soil Quality

153. Policy E4 states that proposals will be required to minimise adverse impacts on soil, avoiding the unnecessary disturbance of peat and other carbon-rich soils; and minimise the amount of land that is affected.
154. **For the reasons set out earlier in Section 5.2.3.6 of this Planning Statement in relation to NPF4 Policy 5, it is concluded that the layout and design of the Proposed Development avoids deep peat and carbon-rich soils as far as possible. Appropriate measures to further minimise and mitigate impacts on deep peat are provided in the Peat Management Plan (Appendix 4). It is therefore considered that the Proposed Development is compliant with LDP2 Policy E4.**
155. **It is noted that the reasons for refusal of the previous application [Document ERC2] make no reference to LDP2 Policy E4. It is therefore assumed that the Planning Authority was in agreement that the Proposed Development is compliant with this policy.**

### 5.3.1.6 LDP Conclusions

156. Overall, it is considered that there is some inconsistency between the LDP2 Policy E2 approach and the relevant balance of considerations now applied through NPF4, in particular in relation to the significant weight that is now to be placed on the contribution to renewable energy targets and the failure to recognise that landscape and visual impacts of a localised scale will generally be acceptable subject to appropriate design mitigation. Given such inconsistencies, in accordance with the 1997 Planning Act it is considered that the provisions of NPF4 should prevail in this regard. It is concluded that the Proposed Development would be in accordance with other relevant policies in LDP2.



## 5.4 Other Material Considerations

### 5.4.1 Onshore Wind Policy Statement

#### 5.4.1.1 Introduction

157. The Scottish Government published the updated Onshore wind Policy Statement (OWPS) in December 2022. This replaced the previous version which was published in November 2017.

158. The Ministerial Forward to the OWPS sets out the key drivers for the need for significant increased renewable energy generation and a speeding up the pace of that deployment. It states that:

*"The world is facing a climate emergency with the impacts of climate change already being felt across the globe. From floods in Pakistan to drought across Europe and last winter's serious storms, the damage that unmitigated climate change can cause is already clear to see.*

*Russia's illegal invasion of Ukraine and the resulting extraordinary rise in the price of fossil fuels, in particular gas, demonstrates that continuing to rely on commodities that are subject to global price shocks is no longer an option.*

*That is why we must accelerate our transition towards a net zero society. Scotland already has some of the most ambitious targets in the world to meet net zero but we must go further and faster to protect future generations from the spectre of irreversible climate damage."*

159. The continued importance of onshore wind technology is recognised, with the Ministerial Forward stating that:

*"Scotland has been a frontrunner in onshore wind and, while other renewable technologies are starting to reach commercial maturity, continued deployment of onshore wind will be key to ensuring our 2030 targets are met."*

160. In light of the above, the OWPS sets a minimum target of 20 GW of onshore wind energy deployment in Scotland by 2030.

#### 5.4.1.2 Ambitions and Aspirations

161. Chapter 1 of the OWPS looks ahead to expected future energy demand in Scotland, and states that:

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

162. The OWPS provides details of current deployment of onshore wind in Scotland. It identifies that as of June 2022 that Scotland had approximately 8.7 GW of onshore wind deployed. It also identifies that as of June 2022 that Scotland has approximately 11.3GW of onshore wind farm projects in the pipeline, but acknowledges that not all of these projects will receive consent and be built.

163. Chapter 1 then presents the new target for minimum installed capacity of 20 GW of onshore wind in Scotland by 2030. It states that:



*“This ambition will help support the rapid decarbonisation of our energy system, and the sectors which depend upon it, as well as aligning with a just transition to net zero whilst other technologies reach maturity.”*

164. As previously identified, the scale of development needed to meet this 20 GW target is notable given that it has already taken over 20 years to develop 8.7 GW of onshore wind energy. It is likely that many proposed onshore wind energy developments that enter into the planning system in the coming years may struggle to deliver installed capacity by 2030 whereas this project has a connection date of 2024. It is therefore confirmed that the Proposed Development is capable of delivering an installed capacity of approximately 15 MW by 2030 and it will therefore make a positive and valuable towards this 2030 target. This potential for early delivery is considered to be a further factor in favour of the Proposed Development.

#### 5.4.1.3 Environmental Considerations

165. The potential environmental considerations to the deployment of onshore wind in Scotland are discussed in Chapter 4 of the OWPS. In terms of landscape and visual impact considerations, paragraph 3.6.1 states that:

*“Meeting our climate change targets will require a rapid transformation across all sectors of our economy and society. This means ensuring the right development happens in the right place. Meeting the ambition of a minimum installed capacity of 20 GW of onshore wind in Scotland by 2030 will require taller and more efficient turbines. This will change the landscape.”*

166. It is clear from this statement that the OWPS therefore recognises that the urgent need to increase renewable energy generation to address climate change and meet net zero targets will inevitably change and have some negative effects on Scotland’s landscapes.
167. Paragraphs 3.6.2 of the OWPS cross references the support that NPF4 now provides for wind energy developments outside of National Parks and National Scenic Areas as well as the stronger weight that is now to be afforded to the contribution of wind energy developments to the climate emergency in assessing proposals. Paragraph 3.6.3. makes clear that NPF4 now recognises significant landscape and visual impacts are to be expected and that where the impacts are localised and / or appropriate mitigation has been applied the effects will generally be considered acceptable.

#### 5.4.1.4 Aviation Considerations

168. The Scottish Government's position in relation to aviation matters and onshore wind is discussed in Chapter 6 of the OWPS.
169. It sets out in paragraph 6.1.2 that whilst there has been a significant amount of onshore wind development enabled to date following the implementation of bespoke aviation mitigation solutions, that *“the pace of deployment necessitated by the climate emergency means we must find a way to alleviate these impacts in an effective, efficient and timely manner.”* It also identifies that it is important that *“[aviation] solutions are cognisant of the cost of deploying renewable energy, particularly given the need to focus on both security of supply and low-cost generation, given the current international and economic situation.”*
170. It is clear from these statements that there is an expectation that mitigation solutions must be found to ensure that the pace of onshore wind deployment needed is not impeded and that the installation of such mitigation must be bound by a fair and transparent process. In this context, and in the context of the recent Scottish Ministers decisions for Sanquhar II Community Windfarm and Clachrie Wind Farm as discussed in paragraph 97 of this Planning



Statement, it is considered GPA's objection [**Document CON6**] to the previous application was unreasonable.

#### 5.4.1.5 Conclusions

171. The OWPS concludes that:

*"Deployment of onshore wind is mission-critical for meeting our climate targets. As an affordable and reliable source of electricity generation, we must continue to maximise our natural resource and deliver net-zero in a way that is fully aligned with, and continues to protect, our natural heritage and native flora and fauna."*

172. Such statements of policy intent, in combination with the new policy target for a minimum of a 20 GW of onshore wind by 2030, make it clear beyond all reasonable doubt the importance of future deployment of onshore wind at scale if the transition towards net zero is to be achieved. Overall, it is therefore concluded that the OWPS introduces significantly strengthened policy support in favour of consent for the Proposed Development and that this should be afforded considerable weight in the determination of this repeat application.



## 6.0 Conclusions

173. The adoption of NPF4 and publication of the OWPS have made it clear that a large increase in the deployment of renewable energy generation by 2030 is vital for Scotland given the combined imperatives of the need to meet net zero targets, to provide energy security and to maximise economic opportunities for the nation. It is clear that the Proposed Development would make an important contribution towards all these objectives and NPF4 now requires that these contributions carry even more weight in the 'planning balance' than they did previously. This means that less weight should necessarily be given to other effects, including landscape and visual effects. This is further augmented by the fact that NPF4 itself must also now be afforded elevated status in the decision-making process for all planning applications given it now forms part of the statutory Development Plan.
174. Another significant effect of the introduction NPF4 is that it is now an acknowledged matter of policy for the first time that wind farms will have some negative landscape and visual effects. NPF4 is clear that where such landscape and visual effects are localised, as they are in the case of the Proposed Development, that they should generally considered to be acceptable. Even if the Planning Authority considers that the landscape and visual impacts of the Proposed Development not to be localised and generally acceptable, it is considered that the Proposed Development satisfies NPF4 Policy 11(e)(ii) since appropriate design mitigation has been applied to minimise the landscape and visual impact of the proposals.
175. Although there was an outstanding objection from Glasgow Prestwick Airport on aviation safety grounds to the previous application, for the reasons discussed in this Planning Statement and supported by the recent Scottish Ministers decisions for Sanquhar II Community Wind Farm [**Document APP9**] and Clauchrie Wind Farm [**Document APP10**] it is considered that this matter could be overcome and controlled by suspensive conditions. Such a condition would prevent the operation of any wind turbines forming part of the Proposed Development prior to the agreement and implementation of the relevant mitigation scheme.
176. Overall, it is therefore concluded that the Proposed Development accords with the relevant provisions of the Development Plan and that there are no material considerations which would still justify refusing to grant planning permission.







# Annex 1 - Index of Supporting Information

Moorshield Wind Farm

Planning Statement

Moorshield Wind Farm Limited

SLR Project No.: 405.P64907.00001

13 September 2023

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