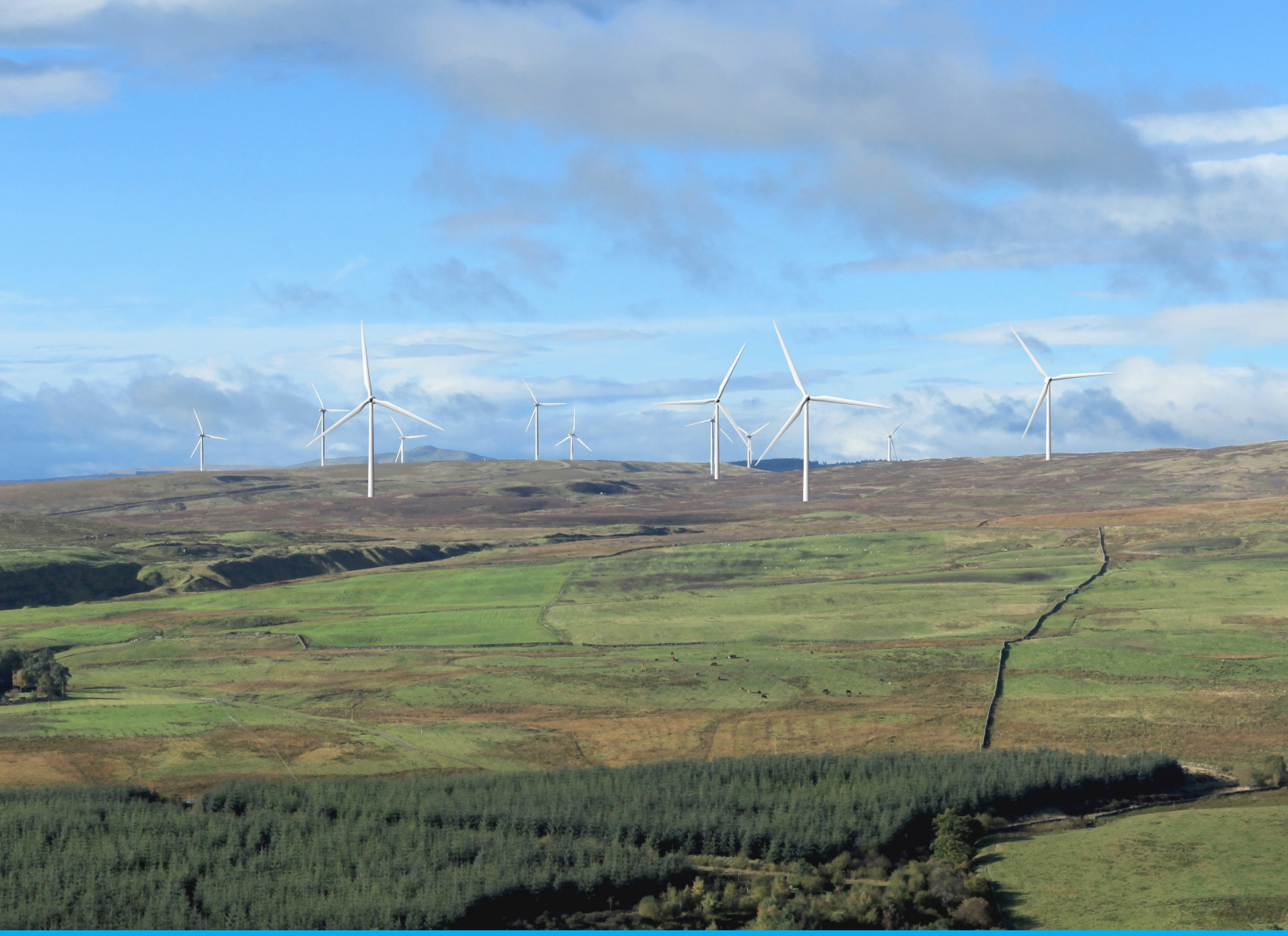

Drummarnock Wind Farm

Planning Statement

July 2024

Drummarnock Wind Farm Limited

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1 Introduction

1.1 Introduction

This Planning Statement has been prepared by Atmos Consulting Limited ('Atmos') on behalf of Drummarnock Wind Farm Limited ('the Applicant') to support an application for planning permission (the 'Application') under Town and Country Planning (Scotland) Act 1997 (the 'Planning Act') for the construction and operation of an electricity generating station known as Drummarnock Wind Farm (the 'Proposed Development').

The Application is accompanied by an Environmental Impact Assessment ('EIA') Report prepared in accordance with the Town and Country Planning (Environmental Impact Assessment) (Scotland) Regulations 2017 (Scottish Government, 2017a).

The EIA Report presents the findings of the EIA process by describing the Proposed Development, the current conditions at the Proposed Development Site and the likely environmental effects which may result from the construction and operation of Proposed Development.

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).

This Planning Statement should be read in parallel with the EIA Report.

Section 25 of the Planning Act states:

"Where, in making any determination under the planning Acts, regard is to be had to the development plan, the determination is, unless material considerations indicate otherwise, to be made in accordance with that plan."

In this case the Development Plan consists of NPF4 and the Stirling Local Development Plan.

1.2 Application Documents

The application is supported by the documents indicated in the list below:

- EIA Report;
- Supporting Documents;
  - Planning Statement (this document);
  - Design and Access Statement; and
  - Pre-Application Consultation Report.
- Application Drawings:
  - Figure 1-1: Site Location; and
  - Figure 1-2: Site Layout

The EIA Report presents the findings of the EIA undertaken in accordance with the EIA Regulations and includes the following:

- Volume 1: Non-Technical Summary;
- Volume 2: EIA Text;

- Volume 3: Technical Appendices; and
- Volume 4: Figures.

1.3 Purpose of the Planning Statement

The purpose of this Planning Statement is to identify and apply the key considerations applicable in the determination of the planning application for the Proposed Development including the policies and provisions of the development plan and other material considerations.

This Planning Statement also:

- Provides details about the Applicant, the Proposed Development Site and the Proposed Development;
- Confirms the application supporting documents (as listed on the Contents page and contained within the EIA Report);
- Sets out the benefits of the Proposed Development in the context of national energy and climate change policies and socio-economic benefits; and
- Summarises the key findings of the EIA which are relevant to the determination of the Application.

1.4 The Applicant

The Applicant, Drummarnock Wind Farm Limited, is a subsidiary of EDPR. Drummarnock Wind Farm is being developed by Wind2 on behalf of EDPR.

EDPR is a global leader in the renewable sector and the world's fourth-largest renewable energy producer. EDPR is currently present in the UK and internationally in another 27 markets.

EDPR has personnel based in Edinburgh and, through its joint venture with ENGIE (Ocean Winds), recently completed construction on the 950MW Moray East Offshore Wind Farm, which has the capability of supplying 40% of Scotland's electricity demand. Further information on EDPR can be found on its corporate website at https://www.edpr.co.en.

Wind 2 is a specialist onshore wind farm developer, founded in 2016. The company has staff based in the Highlands, Perth, Edinburgh, as well as Wales and in various locations throughout England, with significant expertise in renewable energy and a track record of successfully developing onshore wind farms throughout the UK. Further information on Wind2 can be found on its corporate website at https://wind2.co.uk.

2 Site Overview

2.1 Site Description

The Proposed Development is located approximately 10km south-west of Stirling, in the Fintry, Gargunnock and Touch Hills (the 'Proposed Development Site'). The Proposed Development Site which is centred on National Grid Reference (NGR) (NS 74314 87247), is illustrated in Figure 1-1 and is located entirely within the boundary of Stirling Council (SC) local authority area.

The Proposed Development Site is currently used for livestock grazing, including sheep and cattle, and for occasional grouse shooting.

2.1.1 Surrounding Area

The Proposed Development Site features several watercourses, including the Loch Coulter Burn, the Bannock Burn and the Buckie Burn.

The settlement pattern in the wider area is characterised by scattered residences and farms with the nearest substantial settlement being the city of Stirling located approximately 4km north-east of the Site boundary at its closest point.

The nearest roads are an unclassified single-track road that runs southwest-northeast adjacent to the northwestern boundary of the Site and an unclassified road that runs southwest-northeast adjacent to the southeastern boundary of the Site. The M9 runs approximately north-south 3km northeast of the Site boundary at its closest point.

The closest commercial scale wind farm to the Site is the operational Craigengelt Wind Farm, located immediately adjacent to the south-west border of the Proposed Development Site. Beyond this, the operational Earlsburn and Kingsburn Wind Farms form a broad cluster between 2km and 7km west/north-west of the Site boundary.

Shelloch Windfarm Site is located approximately 7km west of the Site boundary. This was granted consent in 2022 but was not constructed at the time of the preparation of this Statement.

The proposed Earlsburn Extension Windfarm would be located approximately 4km northwest of the Site. This development is the subject of an application under Section 36 of the Electricity Act 1989 (as amended) submitted to the Scottish Government's Energy Consents Unit (ECU) in December 2022 and is currently in the process of being determined (at the time of the preparation of this Statement).

2.1.2 Landscape Designations

The Proposed Development Site is situated within the locally designated Southern Hills Local Landscape Area (LLA).

There are a number of designated landscapes in the wider area (defined within the EIA Report, Chapter 5: Landscape and Visual Assessment) including the locally designated;

- Denny Hills Local Landscape Area (SLA);
- Kilsyth Hills LLA;
- Campsie Hills LLA;
- Western Ochils and The Ochills LLA;

- Keir LLA;
- Bar Hill LLA;
- Bardowie, Baldernock and Torrance LLA;
- The Forest LLA;
- Slamannan Plateau/Avon Valley LLA ; and
- Rednock LLA.

Nationally designated landscapes within the wider area comprise the Trossachs National Scenic Area (NSA), Loch Lomond NSA and River Earn (Comrie to St Fillans) NSA; and Loch Lomond and the Trossachs National Park.

These national landscape designations are all located more than 20km from the Proposed Development, and visibility is generally limited to higher site-facing hill flanks, with the Proposed Development being seen in the context of wide-ranging, panoramic views which have been altered by wind farm developments.

2.1.3 Heritage Designations

No designated heritage assets have been identified within the Site. However, within the 10km Study Area there are numerous designated heritage assets, including 54 Scheduled Monuments, 778 listed buildings, 14 conservation areas, five Inventory-listed Gardens and Designed Landscapes, and four Inventory-listed historic battlefields, as defined in Chapter 10 - Cultural Heritage of the EIA Report.

Eight designated heritage assets of high importance have been identified as having potential visibility with the Proposed Development, the presence of which during operation has the potential to change their setting. These assets are thus included in further assessment, and include the following Scheduled Monuments (SM):

- Stirling Castle (SM90291);
- King's Yett, Cairn (SM2580);
- Dundaff Hill, Mound (SM6553);
- Dundaff Hill, Enclosure (SM7131);
- Sauchie Craig, Fort (SM2120);
- Touch Muir, Dun (SM2243);
- Wallstale dun (SM2110); and
- Castlehill dun (SM177).

2.1.4 Ecology

There are 12 environmental designations within 10km of the Proposed Development Site boundary which are summarised below:

- Carron Glen SSSI (2km SE from site boundary);
- Denny Muir SSSI (4km S from site boundary);
- Balquhidderock Wood SSSI (5km NE from site boundary);
- Endrick Water SSSI (6km W from site boundary);
- Endrick Water SAC (6km W from site boundary);
- Double Craigs SSSI (8km W from site boundary);

- Dullatur Marsh SSSI (9km S from site boundary);
- River Teith SAC (8km N from site boundary);
- Ochtertyre Moss SSSI (9km N from site boundary);
- Wester Moss SSSI (8km E from site boundary);
- Abbey Craig SSSI (9km NE from site boundary); and
- Firth of Forth SSSI (10km E from site boundary).

These are shown on Figure 1-3.

The eastern side of the Proposed Development Site is dominated by fields forming part of a working farm located within the Proposed Development Site boundary. The eastern area is dominated by marshy grassland. improved and semi-improved acid grassland and along the north-eastern section of the farm, young conifer plantation has been established.

The western side of the site is a mosaic of blanket bog, acid flushes with areas of dry and wet modified bog and acid grassland.

Suitable habitat for otter and water vole are present on site although no signs were detected during survey work (Phase 1 Extended habitat survey May 2020 and Protected Species Survey February 2023).

A number of features with bat roost potential (trees and buildings) were identified. These are clustered in the east of the Proposed Development Site and south of the Proposed Development Site boundary but within the applicable survey buffer area. Survey work in 2020 and 2023 indicated overall activity at the site as low and medium for common and soprano pipistrelle.

2.1.5 Hydrology, Geology and Hydrogeology

The Site is on low hills, rising from 205m in the east, to 373m in the west. Bedrock is mostly Carboniferous basalts with a small northeast area underlain by Carboniferous micro-gabbros and limestones. Superficial deposits comprise glacial Diamicton till with occasional hummocky glacial deposits and alluvium along watercourses.

Peat is present over much of the Site in the west, generally <1m in depth, but occasionally up to 2m in isolated pockets. Peat is generally absent in the eastern half of Site, except for a few localised areas.

The geology is of low permeability but with small shallow groundwater areas of moderately permeable alluvium along watercourses. Springs and seepages across the site give rise and provide baseflow to watercourse tributaries.

The Site drains north into the Bannock Burn (Source to Sauchie Burn confluence) waterbody and its tributaries; south into the Buckie Burn and its tributaries, part of the River Carron (Carron Valley Reservoir to Avon Burn Confluence) waterbody; and east into Loch Coulter Burn and its tributaries, part of Auchenbowie Burn (Loch Coulter Reservoir to River Carron) waterbody. There are no mapped surface or river flood risks.

The River Carron waterbody overall status is Good. The Auchenbowie Burn overall Status is 'Moderate'. The Bannock Burn waterbody overall status is 'Poor', according to SEPA Classification Hub, and 'Good', according to SEPA Environment Hub. The Auchenbowie Burn waterbody has an objective to improve to Good by 2027.

All waterbodies are designated as heavily modified waterbodies: Bannock Burn due to hydroelectric use downgradient and River Carron and Auchenbowie Burn due to public drinking water use in Carron and Loch Coulter reservoirs.

The groundwater supports highly dependent M6, M23 and M35 GWDTE. M6 flushes and M23 rush pasture occur in the east and centre of the Site, in elongated peaty valley bottoms and sides, in peaty depressions, and on the edges of blanket bogs and raised mires.

They are also found in several larger patches in the west. There are two very small highly dependent M35 spring GWDTE. There are large areas of moderately groundwater dependent MG10 GWDTE grasslands in the extensively drained areas in the east, on mineral or thin peaty soils. Moderately dependent M25 GWDTE occurs in several small peaty areas.

Muirpark Farm spring PWS is potentially in hydrological connectivity as is Muirpark unregistered pond. North Third Reservoir is <1 km downgradient and in hydrological connectivity via Bannock Burn but has no Drinking Water Protected Area (DWPA).

3 The Proposed Development

The Proposed Development consists of four turbines up to a maximum 180m tip height, with an indicative electricity export capacity of approximately 30MW and associated infrastructure.

The associated infrastructure includes :

- New access tracks;
- Construction of turbine foundations, crane hardstandings and storage areas;
- Underground cabling;
- One onsite substation which would accommodate 33KV equipment to collect electricity from the site. The substation compound would include a control and metering building;
- Construction compound;
- Up to four borrow pits; and
- Up to six watercourse crossings.

The Proposed Development includes the provision for 6.59km of new access tracks, which includes two onsite access options (Option A and Option B). However, only one of these onsite access options will be constructed, and therefore of the 6.59km of proposed new tracks, a maximum of up to 5.8km would be constructed, dependent upon the access option utilised. To ensure a robust and conservative assessment, the EIA has assessed the full 6.59km to support the full appraisal of both access options.

The Proposed Development will have an indicative electricity export capacity approximately 30MW. The Proposed Development has been designed with an operational life of 40 years, at the end of which it will be decommissioned unless further consent is granted.

Following expiry of planning permission, the decommissioned above ground infrastructure will be removed and reinstated in an environmentally sensitive way agreed with statutory consultees.

Once the turbines have been installed, the access tracks and hardstand areas around the turbines will remain in place as permanent infrastructure.

A full description of the Proposed Development can be found in Chapter 3 Description of Development in the EIA Report.

3.1 Previous Application

The site has been subject to a previous planning application for a wind farm development of 11 wind turbines at 125m to tip height and associated infrastructure (Planning Application Reference: 09/00170/FUL) which was submitted to Stirling Council in March 2009 and refused in March 2012 and not subject to appeal.

The reasons for refusal focussed on visual effects in relation to the nearby Lewis Hill; visual effects on the setting of Stirling Castle; visual effects relating to cumulative wind energy development and effects on the Kings Yett cairn.

The application boundary for the previous planning application covered the area occupied by the Proposed Development Site but also included land further north, with a total of five turbines located on that land.

The Proposed Development is therefore a significantly smaller scheme than the previous application (albeit with larger turbines) located at a greater distance from the assets listed above. Since the previous application, there has also been significant changes to the cumulative context, national and local policy and the declaration of a Climate Emergency from UK/Scottish Government (May 2019/April 2019)and Stirling Council (October 2019).

3.2 Site Selection and Design Evolution

Site Selection

The Proposed Development Site has been selected as suitable by the Applicant because it met the following criteria:

- There is a commercially viable grid connection;
- There is good wind speed;
- The land is available to the Applicant to allow the construction of a windfarm;
- The Proposed Development location is in proximity to existing operational wind farms and is in an area where wind turbines are already operating at a reasonable distance from the Proposed Development Site;
- The Proposed Development Site is not located within a nationally designated area;
- The Proposed Development will generally be seen as a small modest extension to the nearby existing Craigengelt Wind Farm, as laid out in Stirling Council's (SC) Wind Energy Developments Supplementary Guidance (SC 2019);
- The Proposed Development has the capacity to maintain suitable distance from the nearest residential properties and settlements; and
- The Proposed Development Site benefits from a good existing road network that has been previously used for the transportation of wind turbine components.

Site selection was informed by the spatial framework within Stirling Council's (SC) Wind Energy Developments Supplementary Guidance (SC 2019), with the Proposed Development Site lying within Group 3 of the Spatial Framework, Areas with Potential for Wind Farm Development. The Proposed Development Site is assessed against the spatial policies within NPF4 below.

These are further discussed in the Design and Access Statement in detail.

Design Principles and Evolution

As part of the development process the Applicant has reviewed and discounted alternative infrastructure siting (turbines, sections of new access track and access) due to a variety of factors including environmental, planning, technical and commercial constraints.

The key constraints assessed during the design and Scoping process include:

- Landscape character and visual amenity;
- Ground conditions, topography and peat;

- Proximity to noise sensitive receptors;
- Presence of watercourses, private water supplies and related infrastructure;
- Presence of sensitive ecology receptors;
- Presence of sensitive cultural heritage features;
- Presence of telecommunication and aviation/radar constraints; and
- Proximity to suitable grid connection.

These constraints are discussed in detail in the relevant chapters of the EIA Report. The details for the design iterations can found in the EIAR Report Chapter 3 (Table 3-1) and the Design & Access Statement.

3.3 Benefits of the Proposed Development

3.3.1 Renewables Generation & Carbon Payback

Once operational, the Proposed Development will generate approximately 91,980MWh per year based on an estimated capacity factor of 35%.

This will displace an equivalent amount of fossil fuel generated electricity amounting to a reduction in the release of greenhouse gases equal to 19,040 tonnes over the lifetime of the wind farm.

The Scottish Government's Online Carbon Calculator was used to calculate the carbon payback period for the Proposed Development (online Reference CZS7-1TLY-VOE0 v3).

When taking into consideration the potential carbon loss of various construction and operational phases, the Proposed Development is expected (conservatively) to payback the carbon cost within 3.3 years which represents 8.25% of the operational life of the Proposed Development.

As renewable electricity is increasingly expected to decarbonise heating and transport, the payback period is likely to be less than this as the calculator is updated.

The carbon intensity of the Proposed Development is expected to be 17.20g carbon dioxide (CO_2)/kWh, which is below the 2030 carbon intensity target. The Proposed Development is anticipated to have an overall beneficial effect on climate change mitigation.

The outputs from the Scottish Government's Online Carbon Calculator are presented in EIA Report Chapter 13 Climate Change and Carbon Balance.

3.3.2 Socio Economic Benefits

The development of a wind farm is a substantial investment that results in the generation of employment. It is estimated that the Proposed Development will generate up to 34 jobs during the construction phase, and up to 6 jobs per annum during the operation phase.

It is likely that the Proposed Development will also have wider socio-economic beneficial effects. These would be expected to have positive effects on the local and national economies including:

- Local supply chain opportunities: Wider, 'knock-on' effects of expenditure of workers visiting the area, e.g., in the accommodation, food service and retail sectors;
- Income effects: The generation of additional wages and salaries from new employment, much of which will be spent regionally or nationally;
- Exchequer effects: Additional business rates and tax revenue, regionally and nationally from increased economic activity; and
- Effects on landowners: There will be a financial transaction to the landowners which will support diversification and/or other spending in the local, regional and national economy.

3.3.3 Recreation & Access

The Applicant is currently exploring options to enhance opportunities for access and recreation, via a connection from the minor road to the north-west of the Proposed Development to the Proposed Development access tracks. They are also committed to providing and maintaining public access to the access track network through waymarked trails, signage, and interpretation boards as needed.

3.3.4 Community Benefits & Shared Ownership

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 Applicant proposes a voluntary community benefit package of up to £150,000 per annum, or £6 million over the project's lifespan, based on £5,000 per MW installed generating capacity and a 40 year operating lifespan. Income streams from this community benefits package could provide long term revenue to support local community initiatives.

However, these figures are subject to various factors, including technology availability and turbine procurement. While these benefits are voluntary and not a planning consideration, the Applicant is also interested in exploring community shared ownership opportunities, allowing local communities to invest and receive a share of the profits of the project.

Depending on the initiatives and projects brought forward by the local community these community benefits and community investments could provide positive benefits to the local economy, local facilities and the general quality of life for local residents.

3.3.5 Wildlife and Habitat Management Enhancements

Biodiversity will be enhanced through various measures, including:

- Peatland restoration through increasing water levels in existing ditches and enhancement of M20 degraded blanket bog;
- The provision and maintenance of an area of 6.2ha of suitable breeding habitat for Short-eared owl;
- The provision and maintenance of an area of 6.6ha of wet grassland as breeding habitat for wader species; and
- The provision of bat boxes to increase roosting opportunities.

Refer to Technical Appendix 6-5 Habitat Management Plan for further details.

4 Planning Policy Assessment

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 CO_2 and other harmful gases known collectively as greenhouse gases. 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 greenhouse gas emissions.

Furthermore, there is a clear national focus, following the COVID-19 crisis, to ensure a 'green recovery' for Scotland.

The generation of electricity from renewable energy sources is one of the principal ways in which the Scottish Government targets to reduce greenhouse gas 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.

4.1 United Kingdom Energy & Climate Change Policy

Sixth Carbon Budget 2020

Following on from the Climate Change Committee's (CCC) Net Zero - The UK's Contribution to Stopping Global Warming 2019, the CCC (2019; 2020) published its recommendations for the UK's Sixth Carbon Budget which will run from 2033 to 2037 with the aim of achieving a fully decarbonised UK economy.

The principal recommendation from the CCC is that the UK sets a Sixth Carbon Budget to require a reduction in UK greenhouse gas emissions of 78% by 2035 relative to 1990, or a 63% reduction from 2019.

The sixth budget, imposed by the Carbon Budget Order 2021 on 24 June, covers the years 2033-2037 (UK Government, 2021a). The UK Government set the budget at 965 million tonnes of carbon dioxide equivalent. This is in line with the CCC's recommendation (CCC, 2021).

Net Zero Strategy: Build Back Greener

In October 2021, the UK Government's Net Zero Strategy (UK Government 2021b) was presented to the UK Parliament In accordance with Section 14 of the Climate Change Act 2008 (UK Government, 2008). It acknowledges the devastating impact that the increase of global temperatures has already had on the UK through flooding and disruption to major services.

In line with the Paris Agreement (UNFCCC, 2015), reference is made to potentially catastrophic events that will unfold should global warming increase above 1.5 degrees. It is recognised that in order to meet the Paris Agreement, urgent global action is needed hence why the UK called for ending coal fired power generation, retiring petrol and diesel engines from all cars, and halting deforestation at COP26.

The strategy sets out clear policies and proposals for keeping the UK on track for forthcoming carbon budgets, ambitious Nationally Determined Contribution (NDC), and the UK Government's vision for a decarbonised economy in 2050.

The strategy has a number of commitments for reducing emissions across the economy in relation to power generation. For instance, the target that the UK government will take action so that by 2035, all electricity will come from low carbon sources, bringing forward the government's commitment to a fully decarbonised power system by 15 years.

In 2019, net UK GHG emissions from the power sector totalled 58 million tonnes of CO_2 and accounted for 11% of total net UK GHG emissions. This is a reduction of 72% between 1990 and 2019. In 1990, the power sector accounted for 23% of UK GHG emissions. This has largely been achieved through renewables and natural gas generation displacing coal.

The UK Government's vision is that low carbon forms of energy generation will be the paradigm shift away from the use of unabated oil and gas. Low carbon energy is expected to account for a 50% or higher share of final energy consumption. This shift to low carbon energy is expected to account for up to 76% reduction in emissions by 2030; up to 85% by 2035 and 98% by 2050, when compared with 2019 emissions.

In delivering this strategy of decarbonising the power sector, significant public and private investment is needed and this will see new employment opportunities across the UK. The UK Government estimate that policies and proposals to reduce emissions in the sector could support up to 59,000 jobs by 2024 and up to 120,000 jobs by 2030.

UK Climate Change Risk Assessment 2022

The third UK Government Climate Change Risk Assessment (CCRA3, UK Government 2022) report was presented to Parliament on 17 January 2022 and outlines the UK Government and devolved administrations' position on the key climate change risks and opportunities that the UK faces.

The Technical Report for the CCRA3 identified 61 UK-wide climate risks and opportunities across multiple sectors such as energy; agriculture; people; transport and biodiversity if there is a 2- and 4-degree global warming scenario (Betts and Brown, 2021).

Of the 61 climate risks and opportunities 34 risks are assessed as 'more action needed' at a UK-wide level. This means that new, stronger, or different government action is required in the next five years over and above those already planned.

Some of the risks include:

- Risk to soils from changing climatic conditions, including seasonal aridity and wetness;
- Risks and opportunities for natural carbon stores, carbon sequestration and GHG emissions from changing climatic conditions, including temperature change and water scarcity;
- Risks to and opportunities for agricultural productivity from extreme events and changing climatic conditions (including temperature change, water scarcity, wildfire, flooding, coastal erosion, wind and saline intrusion);

- Risks to infrastructure services from river, surface water and groundwater flooding;
- Risks to public water supplies from reduced water availability;
- Risks to health and wellbeing from high temperatures;
- Risks to people, communities and buildings from river and surface flooding; and
- Risks to UK food availability, safety, and quality from climate change overseas.

The Proposed Development will directly support these national efforts by contributing to renewable energy generation and reducing carbon emissions.

4.2 Scottish Energy & Climate Change Policy

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 October 2019 SC recognised the Climate and Nature Emergency, and in 2021 the SC Climate and Nature Emergency Plan 2021-2045 (SC 2021) was published. The Plan explains SC's vision for a fossil fuel-free and climate-ready Stirling and sets out a target for the SC area to achieve 'net zero' carbon by 2045.

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

Amending the Climate Change (Scotland) Act 2009, the Climate Change (Emission Reduction Targets) (Scotland) Act 2019, emphasises the need to deliver renewable energy targets and focuses on giving considerable weighting to the determination of renewable energy proposals (Scottish Government, 2009; 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), to 100% by 2045. Renewable energy projects, such as the Proposed Development, play a key role in supporting the decarbonisation of the energy sector.

Scotland's Climate Assembly: Recommendations for Action (2021)

As required by the Climate Change (Emissions Reduction Targets) (Scotland) Act 2019 (Scottish Government 2019) the Assembly on climate change was established. The Assembly comprises a group of over 100 people selected to be representative of Scotland's adult population. The Assembly published their Recommendations for Action in June 2021.

The Recommendations for Action outlined several goals and recommendations across a variety of sectors aimed at addressing the climate emergency in an effective and fair way. The report identified eradicating fossil fuels as a priority through the maximisation of energy generation via renewables.

Scottish Energy Strategy (2017)

The Scottish Energy Strategy (SES): The Future of Energy in Scotland (Scottish Government, 2017b) 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".*

The SES sets two new targets for the Scottish energy system by 2030:

- The equivalent of 50% of the energy for Scotland's heat, transport and electricity consumption to be supplied from renewable sources; and
- An increase by 30% in the productivity of energy use across the Scottish economy.

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 and noted in the Scottish Government (2021a) Energy Position Statement.

In setting out this target, the Scottish Government analysis that sits behind it is described as indicating that renewable electricity has already outperformed targets, stating that;

> *"the interim 2015 target of 50% – could rise to over 140% of Scottish electricity consumption, ensuring its contribution to the wider renewable energy target for 2030."*; and
>
> *"This assumes a considerably higher market penetration of renewable electricity than today – requiring in the region of 17 GW of installed capacity in 2030 (compared to 9.5 GW in June 2017) – with greater interconnection with parts of continental Europe providing an expanded market for our electricity".*

In championing the potential of Scotland's huge renewable energy resource, the SES recognises that renewable and low carbon energy will provide the foundation of the envisaged future energy system and considers onshore wind to be amongst the lowest cost forms of renewable power generation.

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.

Identifying and providing a route to market for onshore wind energy is recognised in the SES as key to achieving the objectives and vision of the strategy and refers to further detail provided in the Scottish Government Onshore Wind Policy Statement (Scottish Government, 2017c) which was published alongside the SES.

Draft Energy Strategy and Just Transition Plan (2023)

The Draft Energy Strategy and Just Transition Plan was published on 10 January 2023 (Scottish Government, 2023a). 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 with offshore wind, onshore wind, solar and hydrogen listed as just some of the sources which should have the potential to make up the energy mix.

Scotland's Energy Position Statement (2021)

Published in March 2021, the Scottish Government (2021a) Position Statement provides an overview of key priorities for the short to medium-term in ensuring a green economic recovery and emphasises that Scotland has the most ambitious legislative framework for emissions reduction in the world and a particularly challenging interim target for 2030, underpinned by a legal commitment to deliver a just transition.

It recognises that Scotland is making progress towards its target and in 2019, Scotland's renewable electricity generation was able to meet the equivalent of 90% of its gross electricity consumption.

The need for the continued development of the renewable energy sector in Scotland is emphasised within the Position Statement (Scottish Government, 2021a), where is noted that:

> *"The continued growth of Scotland's renewable energy industry is fundamental to enabling us to achieve our ambition of creating sustainable jobs as we transition to net zero."*

This point is further illustrated by recent statistics from Scottish Renewables (2023) and the Scottish Energy Statistics Hub (2023d) which show that:

> *"…renewable electricity generation is now equivalent to approximately 97% of Scotland's gross electricity consumption."*

The Statement was published to set out a clear overview of policies in relation to energy ahead of COP26 in November 2021.

It reinforces Scotland's commitment to; *"supporting the increase of onshore wind in the right places to help meet the target of Net Zero"*, whilst ensuring a "green, fair and resilient recovery" for the Scottish economy. It is clear in its position that: *"The potential remains for much more renewable capacity and development across Scotland"*.

Furthermore, the publication of the June 2023 of the CCC report to the UK Parliament (CCC 2023), emphasises the need for the expansion of onshore wind energy, noting that its deployment is 'slightly off-track', despite its status as one of the most cost-effective forms of electricity generation.

Update to the Climate Change Plan 2018-2032: Securing a Green Recovery on a Path to Net Zero

The Scottish Government (2020b) published its updated Climate Change Plan in December 2020. This update to the 2018-2032 Climate Change Plan, along with the Scottish Government (2021b) Energy Strategy: Position Statement (2021) provides the strategic framework for the transition to a low carbon Scotland.

The Update sets ambitious new targets to end Scotland's contribution to climate change by 2045 and sets out the commitment to reduce emissions by 75% by 2030 (compared with 1990) and to net zero by 2045. It states that COVID-19 does not change Scotland's ambitions and indeed, gives Scotland the opportunity to lead the way in meeting climate change targets.

The March 2024 Climate Change Committee (CCC, 2024) 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."

In acknowledgement of this report, on 18 April 2024, the Scottish Government (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) 2022 (Scottish Government, 2022) 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 8.7GW (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. For reference, as of March 2024 Scotland's onshore wind capacity was 9.6MW (source: Scottish Govt Website)

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."* (page 17)

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 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."*

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 in order to meet the ambition of; *"a minimum installed capacity of 20 GW of onshore wind in Scotland by 2030"*.

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

The OnWPS cites evidence that significant positive effects for biodiversity from wind farm developments can be achieved and provides examples of best practice in biodiversity enhancement on wind energy development. Through this there is an expectation that new onshore wind development will demonstrate commitment to protecting and restoring habitats.

The criteria through which proposals will be evaluated has been updated to focus a stronger emphasis on the role which wind energy developments can play both in the response to the joint climate and nature crises as well as the resulting socio-economic and community benefits.

4.3 Scottish Programme for Government 2023 to 2024

The Programme for Government is published every year at the beginning of September and sets out the actions the Scottish Government will take in the coming year and beyond. In September 2023, the Scottish Government published: "Equality, Opportunity, Community: Our Programme for Government 2023 to 2024" (Scottish Government, 2023e).

In this programme, the Scottish Government emphasises the opportunity to build a fair, green and growing economy, outlining the commitment to *"..maximise the*

opportunities of the green economy.." whilst indicating that "*responding to the climate crisis is a fundamental priority for this government*".

The importance of the role which renewable energy generation will play in the response to climate change is referred to by the Scottish Government as being "*central to our strategy*" with the Onshore Wind Sector Deal for Scotland (Scottish Government, 2023f) established "*to help deliver our onshore wind ambition, maximising the benefits for Scotland's economy and communities*".

The Proposed Development will contribute directly towards these goals.

5 National Planning Policy

5.1 The Fourth National Planning Framework

NPF4 (Scottish Government 2023c) is the national spatial strategy for Scotland. It sets out the principles for spatial development, defines national developments and regional priorities and sets out national planning policy.

NPF4 is different to its predecessor, NPF3 (Scottish Government, 2014a), as it has become part of the statutory Development Plan. This means that its policies have a stronger role in day-to-day planning decision making. NPF4 replaces NPF3 and Scottish Planning Policy (Scottish Government, 2014b), with national planning policies integrated into the new National Planning Framework.

NPF4 sets out significant 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, 2014b) 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*" (page 4). It is set out 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."(page 7)*

In terms of renewable energy generation, NPF4 (Annex B – National Developments Statements of Need) 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" (page 103):* 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" (page 103).*

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" (page 36).*

Section 24 of the Planning Act states that:

> " *In the event of any compatibility 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."*

5.1.1 NPF4 Policy 1: Tackling the Climate and Nature Crisis

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

It is emphasised within NPF4 Policy 1 that; "…*when considering all development proposals significant weight will be given to the global climate and nature crises" (page 36)*.

As shown in Chapter 13: Climate Change and Carbon Balance of the EIA Report, the Proposed Development will contribute directly to efforts to address the global climate emergency, making a material contribution to reducing Scotland's CO_2 emissions.

The contribution of approximately 30MW of installed renewable energy generation capacity from the Proposed Development is estimated to generate 91,980MWh per year, sufficient electricity to power the equivalent of 24,859 households in Scotland annually.

Considering the potential renewable energy generation, carbon displacement, and savings, the Proposed Development is conservatively expected to offset its carbon cost within 3.3 years compared to grid mix electricity generation.

The Applicant has also ensured that addressing the nature crisis is central to the assessments detailed within the EIAR.

Chapter 6: Ecology and Chapter 7: Ornithology of the EIA Report both conclude that subject to mitigation measures and best practice there would be no significant adverse effects upon ecological or ornithological receptors as a result of the Proposed Development.

This demonstrates that the Proposed Development would meet Policy 1 of NPF4.

5.1.2 NPF4 Policy 2: Climate Mitigation and Adaptation

The intent of this policy is to; "… *encourage, promote and facilitate development that minimises emissions and adapts to the current and future impacts of climate change."*(page 37)

As a generator of renewable energy, the Proposed Development will assist in Scotland's adaptation to climate change by producing electricity from a renewable source, contributing to the Scottish Governments ambition to deploy 20GW of onshore wind by 2030 as set out in the OnWPS 2022 (Scottish Government, 2022).

The contribution of the Proposed Development to carbon emissions reduction has been assessed within Chapter 13: Climate Change and Carbon Balance of the EIA Report. As the Proposed Development is expected to result in a CO_2 emission saving of 19,040 tonnes CO_2 equivalent over a proposed 40-year lifetime, it has been assessed as having a significant (positive) influence on climate change.

It is also shown within Chapter 13 that the vulnerability of the Proposed Development to climate change has been assessed against the UKCP18 emissions scenario RCP6.0. This scenario assumes no further emission reductions are achieved after 2030, whilst allowing for some further increase in emissions (DEFRA, 2020), and considers predicted climate change induced deviations, including those in wind, temperature and precipitation.

Given the embedded mitigation including watercourse buffering to avoid flooding (given the projected trend towards warmer, wetter winters and hotter, drier summers);

the significance of effect of climate change on the operation of the Proposed Development has been assessed as negligible, and therefore not significant in terms of the EIA Regulations.

This demonstrates that the Proposed Development would meet Policy 2 of NPF4.

5.1.3 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.*" (page 38)

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."(page 38)*

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. Further details are available in Chapter 3: Description of Development of the EIA Report.

Flush habitats, watercourses, areas of deepest peat and sensitive bog pool habitat have been avoided as far as possible and track length reduced as far as possible to minimise land take.

Chapter 6: Ecology of the EIA Report assesses the effect of the Proposed Development on ecological receptors, concluding that, with mitigation, the Proposal Development will not have significant negative effects on habitats or protected species.

Mitigation measures to further protect ecological receptors will be applied during the construction phase, including:

- Production of a Construction Environmental Management Plan (CEMP) setting out the principles and procedures for environmental management during construction of the Proposed Development (an outline CEMP is included with the application as Technical Appendix 15-1 of the EIA Report).

The CEMP will include mitigation and monitoring measures for ecological interests;

- A pre-construction survey for protected species with a 200m buffer applied to any identified protected species interests; and
- Appointment of a qualified Environmental Clerk of Works (EnvCoW) to oversee construction activities with specific roles and responsibility detailed in the CEMP.

Chapter 7: Ornithology of the EIA Report concludes that, with the implementation of good practice measures, there would be no significant negative effects on Important Ornithological Features (IOFs) as a result of the Proposed Development.

To protect nests and sensitive species during construction, activities will be carefully timed and restricted in sensitive areas during the early breeding season.

If work must occur between mid-March and August, pre-construction surveys will ensure nests and sensitive species are not disturbed. Buffer zones around nests will be monitored, and a Bird Protection Plan (BPP) will be developed with NatureScot to detail protection measures.

A programme of post-construction bird monitoring (including collision monitoring and targeted wader surveys) within the vicinity of the Proposed Development is proposed.

Biodiversity enhancement measures are detailed in Technical Appendix 6-5 Habitat Management Plan. These include:

- Peatland restoration through increasing water levels in existing ditches and enhancement of M20 degraded blanket bog;
- The provision and maintenance of an area of 6.2ha of suitable breeding habitat for Short-eared owl;
- The provision and maintenance of an area of 6.6ha of wet grassland as breeding habitat for wader species; and
- The provision of bat boxes to increase roosting opportunities.

This demonstrates that the Proposed Development would meet Policy 3 of NPF4.

5.1.4 NPF4 Policy 4: Natural Places

NPF Policy 4 is intended to; "*protect, restore and enhance natural assets making best use of nature-based solutions.*"(page 40)

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.*
>
> *b) Development proposals that are likely to have a significant effect on an existing or proposed European site (Special Area of Conservation or Special Protection Areas) and are not directly connected with or necessary to their conservation management are required to be subject to an "appropriate assessment" of the implications for the conservation objectives"*

and

> *"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."(page 40)*

Development proposals that will affect designated sites, including but not limited to National Scenic Areas (NSA) and Sites of Special Scientific Interest (SSSI), will only be supported where the designation is not compromised or where any significant adverse effects; "*…are outweighed by social, environmental or economic benefits of national importance*".

The Proposed Development has followed a consultative and iterative design process in order to minimise significant effects upon landscape and visual receptors in addition to providing the potential for productive renewable energy infrastructure within Stirling.

Chapter 6: Ecology and Chapter: 7 Ornithology of the EIA Report provide comprehensive assessments of the potential impact on natural places, determining that the Proposed Development does not have the potential to affect any SSSI or any other site carrying a statutory designation.

The Proposed Development Site does not lie within a National Park or NSA. The Proposed Development is over 20 kilometres from the nearest nationally designated areas, which include the Trossachs NSA, Loch Lomond NSA and River Earn (Comrie to St Fillans) NSA; and Loch Lomond and the Trossachs National Park (all within 45km of the Proposed Development Site).

Chapter 5: Landscape and Visual of the EIA Report has assessed the impact on landscape including the effect on the above sites, and has determined that visibility would be limited to higher hill flanks, and any impact will be within the context of existing wind farms like Craigengelt.

The Proposed Development Site lies within the Southern Hills Local Landscape Area (LLA) and is anticipated to result in major/moderate and significant effects upon this LLA, mainly in a localized area around the site and to the northeast of the Craigengelt Wind Farm.

The predicted effects on the host Local Character Type (LCT) are considered moderate, particularly in the Lowland Hills (149) LCT where the development is situated. However, as the area has already been affected by the Craigengelt Wind Farm, the Proposed Development is seen as more of an extension to the existing wind farm rather than a completely new intervention.

The Proposed Development is not expected to significantly impact other LCTs or compromise the integrity of landscape designations.

It is noted that wind farms have already altered parts of the Southern Hills LLA, and the Proposed Development will not significantly change the landscape dynamics or the gap between existing wind farm clusters in the area. Although significant effects are anticipated on the Southern Hills LLA, these effects will be localised and are not judged to significantly alter the overall integrity of the LLA.

This demonstrates that the Proposed Development would meet Policy 4 of NPF4.

5.1.5 NPF4 Policy 5: Soils

NPF Policy 5 is intended to; *"protect carbon-rich soils, restore, peatlands and minimise disturbance to soils from development."* (page 42)

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;

iii. Small-scale development directly linked to a rural business, farm or croft; iv. Supporting a fragile community in a rural or island area; or v. Restoration of peatland habitats.

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."(page 42)

A full and extensive programme of peat probing has been undertaken to establish peat depths across the site.

Phase 1 was undertaken in a number of phases, initially in the main turbine area and then subsequently at lower elevations in the vicinity of potential access tracks. In total c. 230 probes were taken on the 100m grid.

Subsequent probing focused on refining infrastructure locations using a variety of grid spacings with the final locations assessed using a 10m grid. In total, across Phase 1, interim and final Phase 2 surveys, 2,340 locations were probed.

It has been established that while peat is present over much of the main infrastructure area in the west, it is fairly shallow, rarely exceeding 1m in depth, and where it does so, only in isolated pockets.

These pockets can however contain deep peat up to 2m thick. In the eastern half of the Proposed Development Site, peat is generally absent, except for a few localised areas not exceeding 1m in thickness.

No Class 1 or 2 peat has been identified at the Proposed Development Site (see Chapter 8 Hydrology, Geology and Hydrogeology of the EIA Report).

The condition of the peat has been considered and reported in Technical Appendices 8-2 Peat Management Plan and 8 -3 Peat Landslide Hazard Risk Assessment.

This has determined that peat is relatively thin over undulating bedrock, thickening to form planar deposits between local topographic highs. In the upper slopes, flushes emerge from the hillsides, marked by grass and rush ridge areas of vegetation, become minor watercourses in the lower slopes. While sphagnum is locally present, it is not necessarily widespread and heather and grasses dominate.

There is little evidence of erosion in terms of gullying and no signs of incipient instability were observed.

The Proposed Development has been designed to minimise peat disturbance and sought to maintain peat hydrology as much as possible and for the much of the Proposed Development Site, no peat will be excavated.

A small number of localised areas of cut track are required in peat, but these are typically on the approaches to hardstanding or over short distances of peat where transition pieces between cut and fill and floating track will limit the length of floating track to the point of it offering little excavation saving.

The carbon balance of the Proposed Development has been assessed using the Scottish Government's Online Carbon Calculator with the results presented in Chapter 13: Climate Change and Carbon Balance. This takes into account the peat loss as a result of the Proposed Development.

The results of this assessment are that the Proposed Development is expected (conservatively) to payback the carbon cost within 3.3 years which represents 8.25% of its operational life.

This demonstrates that the Proposed Development would meet Policy 5 of NPF4.

5.1.6 NPF 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.*" (page 45)

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."(page 45)*

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."(page 46)*

Chapter 10: Cultural Heritage of the EIAR assesses the potentially significant impact on historic assets. The chapter is accompanied by Technical Appendix 10-1 Historic

Environment Assessment, which provides an understanding of how the cultural significance of these historic assets may be altered by the Proposed Development.

Technical Appendix 10-2 NPF4 Addendum provides additional expert analysis/interpretation of the EIA findings, with regard to the relevant provisions of NPF4.

The Proposed Development has followed a consultative and iterative design process in order to minimise significant effects upon cultural environment and assets. Following consultation with Historic Environment Scotland, the initial six turbine Scoping layout was reduced in terms of horizontal spread. The overall aim of this reduction was to create a layout which limited any increase to the field of view of operational turbines against the existing view of Craigengelt Wind Farm from sensitive receptors (including Stirling Castle). The sixth turbine was subsequently removed from the design altogether, to address further consultation comments from HES in relation to the views from Stirling Castle.

The Proposed Development is not expected to directly impact heritage assets, but construction activities may disturb buried archaeological remains, though the likelihood is considered minimal. Efforts have been made to avoid deep peat areas to minimize disturbance to potential paleoenvironmental records, with negligible assessed impact.

The Proposed Development is not expected to significantly impact heritage assets, but minor changes to the setting of several designated and non-designated assets are anticipated during operation, resulting in minor potential effects in Environmental Impact Assessment (EIA) terms.

These changes include minor alterations to the setting of King's Yett Cairn, Dundaff Hill Mound, Dundaff Hill Enclosure, Stirling Castle, and Buckie Burn Sheiling-Hut. However, these adjustments are deemed to have minimal impact on the overall cultural significance of the assets, and are addressed carefully in the EIA Chapter 10 Cultural Heritage and Technical Appendixes 10-1 and Appendix 10-2.

Assessment of the likely impacts of the Proposed Development on historic assets, in accordance with national policy and guidance, concludes no significant adverse impact on the integrity of the setting of Scheduled Monuments.

The CEMP for the Proposed Development includes measures such as micrositing for adjustments around turbine and access track locations to minimise impacts on any unidentified heritage assets.

An Archaeological Clerk of Works (ACoW) will be appointed during the construction phase to develop and implement working protocols for archaeological discoveries, and the fencing off and marking out of the elements of Muirpark, farmstead (SC HER Ref. 2730) will be undertaken, to avoid physical effects on the asset during construction.

This demonstrates that the Proposed Development would meet Policy 7 of NPF4.

5.1.7 NPF4 Policy 11: Energy

Policy 11 is the key lead policy in the Development Plan for the assessment of the Proposed Development.

It 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.)" (page 53)

The policy states that: *"Development proposals for all forms of renewable, low-carbon and zero emissions technologies will be supported."*

In addition, project design and mitigation is required to demonstrate how specific impacts are addressed. These include;

> *"c) Development proposals will only be supported where they maximise net economic impact, including local and community socio-economic benefits such as employment, associated business and supply chain opportunities.*
>
> *…*
>
> *e) In addition, project design and mitigation will demonstrate how the following impacts are addressed:*
>
> i. *impacts on communities and individual dwellings, including, residential amenity, visual impact, noise and shadow flicker;*
> ii. *significant landscape and visual impacts, recognising that such impacts are to be expected for some forms of renewable energy. Where impacts are localised and/ or appropriate design mitigation has been applied, they will generally be considered to be acceptable;*
> iii. *public access, including impact on long distance walking and cycling routes and scenic routes;*
> iv. *impacts on aviation and defence interests including seismological recording;*
> v. *impacts on telecommunications and broadcasting installations, particularly ensuring that transmission links are not compromised;*
> vi. *impacts on road traffic and on adjacent trunk roads, including during construction;*
> vii. *impacts on historic environment;*
> viii. *effects on hydrology, the water environment and flood risk;*
> ix. *biodiversity including impacts on birds;*
> x. *impacts on trees, woods and forests;*
> xi. *proposals for the decommissioning of developments, including ancillary infrastructure, and site restoration;*
> xii. *the quality of site restoration plans including the measures in place to safeguard or guarantee availability of finances to effectively implement those plans; and*
> xiii. *cumulative impacts."* (page 53)

The Proposed Development has been assessed against these impacts in the following table (Table 1).

Table 1: Proposed Development Compliance with Policy 11

Policy Requirement	Compliance Summary
Policy 11(a) Development proposals for all forms of renewable, low-carbon and zero emissions technologies will be supported. These include: i) wind farms including repowering, extending, expanding and extending the life of existing wind farms;	The Proposed Development is a four-turbine wind farm.
Policy 11(b) Development proposals for wind farms in National Parks and National Scenic Areas will not be supported	The Proposed Development is not situated in a National Park or National Scenic Area.
Policy 11(c) Development proposals will only be supported where they maximise net economic impact, including local and community socio-economic benefits such as employment, associated business and supply chain opportunities.	EIAR *Chapter 12: Socio-economics Tourism and Recreation* presents the socio-economic benefits of the Proposed Development, including; • A community fund of £5,000 per each of the up to 30 MWs installed generating capacity throughout the 40-year lifespan to be set up for local initiatives, • The community is being offered the opportunity for community shared ownership • The development, construction and operation phases of the Proposed Development will create employment opportunities, with contractors employing local people. The development and construction phases are anticipated to provide up to five and up to 34 jobs, respectively, with the operation phase anticipated to provide up to six jobs per annum. • Local supply chain opportunities and additional exchequer effects as result of taxes borne and community benefit funds • Income effects including the generation of additional wages and salaries from new employment, much of which will be spent regionally or nationally. • The applicant considers that this is the maximum scale of development on the site taking into account all environmental factors identified through the EIA process
e) In addition, project design and mitigation will demonstrate how the following impacts are addressed: (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 -14 of the EIA Report. The key findings are: • The impact on communities in relation to Residential Visual Amenity was assessed as part of the EIAR and is detailed within *Technical Appendix 5-2 Residential Visual Amenity Assessment (RVAA)*. The assessment concludes that residents will not experience effects arising from the Proposed Development that breach the residential visual amenity threshold; • The effect of noise generation resulting from the Proposed Development has been assessed and reported in *Chapter 11: Noise* of the EIA Report. Noise effects associated with the construction and operational phases of the Proposed Development, considered both in isolation and cumulatively with other potential development in the area, were considered not significant. The operational noise effects

Policy Requirement	Compliance Summary
	associated with the Proposed Development operating in isolation are considered not significant. Potential significant cumulative operational noise effects associated with wind turbine noise from the Proposed Development and other potential development in the area have been identified at one receptor, Ryecroft. Mitigation in the form of a curtailment strategy is provided to demonstrate that these effects can be reduced such that the residual effect is not significant; and • *Chapter 14: Other Considerations* of the EIA Report presents the findings of the assessment of the effects of shadow flicker, determining that no properties will experience shadow flicker at a level greater than 30 hours per year (the accepted threshold in terms of the UK Shadow Flicker Evidence Base, considering true flicker when quantified using average sunshine hours per month data from the Centre for Environmental Data Analysis (CEDA)). No significant effects are, therefore, anticipated as a result of the Proposed Development.
(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 findings of the Landscape and Visual Impact Assessment (LVIA) are reported in the EIA Report Chapter 5 supported by *Appendix 5-1 Methodology*, *5-2 Residential Visual Amenity Assessment* and *5-3 Aviation Lighting Assessment*. The key points relevant to this assessment are: • An extensive iterative design process as detailed in *Chapter 3: Description of Development* and the *Design and Access Statement*, has ensured that potential impacts on Landscape and Visual receptors are minimised and mitigated where necessary. • The LVIA was comprehensive in its approach, detailing the potential for significant effects as a result of each phase of the Proposed Development lifecycle (construction, operation and decommissioning), including the potential effect on landscape resource, landscape character and residential visual amenity; • NPF4 puts local effects on a lesser footing than national effects and the contribution to addressing climate change is elevated significantly. • LVIA and Residential Amenity sections are produced according to Landscape Institute guidelines. • Situated within the Southern Hills Local Landscape Area, the Proposed Development is expected to have moderate effects on the landscape, mainly in the Lowland Hills LCT. However, due to the scale of the development it will generally be seen as an extension of an existing wind farm rather than as a completely new project. The development isn't expected to significantly impact other landscape types or existing designations. Additionally, its impact on national scenic areas is negligible due to the distance (20 km), with limited visibility owing to surrounding hills. • The Proposed Development will slightly extend wind turbine influence northeast of Craigengelt. Visually, this is considered a small addition to existing turbines. Gaps between wind farms in the Southern Hills remain visible. Overall, it won't significantly affect this landscape with existing wind farms. • Significant visual effects are predicted at five out of sixteen representative viewpoints, primarily within 6km and closer proximity. The Proposed Development is generally seen within the context of the operational Craigengelt Wind Farm, with notable differences in turbine scale from certain viewpoints but generally reading as one wind farm. • Significant effects are also predicted from open sections of the Core

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	Path network within 4km northeast of the Proposed Development, but no significant effects are expected from settlements overall. • The construction activity will cause significant but temporary effects on landscape, mainly within the Site and localised area, due to the construction of turbines and new tracks. Temporary visual effects due to construction activity will be caused by the tall cranes and turbine assembly. • Mitigation measures to reduce the localised landscape and visual effects due to construction, including vegetation and soil management, are outlined in the Outline CEMP. Ground vegetation will fully recover in three to five years after restoration, with the impact diminishing over time. Once vegetation is restored, there will be no significant landscape or visual effects from ground disturbance. • Mitigation measures for operational effects on the landscape and visual receptors were largely addressed during the development's design phase, as described in *Chapter 3: Description of Development*, *Technical Appendix 14-1 Windfarm Reduced Lighting Scheme Proposal*, and the *Design and Access Statement*. Accordingly, the landscape and visual effects of the Proposed Development have been demonstrated to be localised in nature and, having applied mitigation through the design process, are considered to be acceptable within the terms of this policy.
(iii) Public access, including impact on long distance walking and cycling routes and scenic routes	The potential impact on public access been assessed and reported in EIA Report *Chapter 9: Transport & Access*, *Chapter 12: Socio-economics Tourism and Recreation* and *Design & Access Statement,* which establish that no walking routes will be disrupted by the construction of the Proposed Development as there are no paths within its footprint. The Applicant is open to consider enhancing pedestrian access by using the Proposed Development access tracks. They are also committed to providing and maintaining public access to the access track network through waymarked trails, signage, and interpretation boards as needed. As such it is anticipated that the Proposed Development will have no significant effect on public access.
(iv) Impacts on aviation and defence interests including seismological recording	The potential impact on aviation and defence operation been assessed and reported in EIA Report *Chapter 14: Other Considerations*. Consultation with NATS influenced the final design, leading to a mitigation agreement in September 2023. A bespoke aviation safety lighting scheme, meeting CAA and MOD standards, was developed with Straten CSL (*Technical Appendix 14-1 Windfarm Reduced Lighting Scheme Proposal*) With these measures in place, adverse effects on aviation due to the Proposed Development are not expected.
(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 EIA Report *Chapter 14: Other Considerations*. The Applicant consulted with various telecommunications operators, whose input influenced the final design. After addressing concerns raised by stakeholders, it is concluded that the Proposed Development will not affect telecommunication infrastructure.
(vi) Impacts on road traffic and on adjacent trunk roads, including during construction	The potential effect on the traffic and roads have been assessed and reported in EIA Report *Chapter 9: Transport & Access*. The main impacts associated with the Proposed Development will be at the construction stage which is anticipated to cover a 12 month period and will involve the delivery of materials to site and the movement of site staff on a daily basis. The assessments undertaken indicate that with the implementation of

Policy Requirement	Compliance Summary
	appropriate mitigation measures including a Construction Traffic Management Plan (CTMP), no significant residual effects are expected in relation to traffic and transport. The construction of the Proposed Development will entail the delivery of large turbine components to the site. The effect of this has been assessed and is reported in *Technical Appendix 9-1 Abnormal Loads Assessment*. This has identified no significant barriers or risks associated with the deliveries but did identify a total of nine 'points of interest' that will require temporary street furniture removal, temporary paving and third party land agreements.
(vii) Impacts on historic environment	The Proposed Development is designed to avoid significant impacts on cultural heritage assets within the study area. The Applicant has commissioned a comprehensive assessment of potential effects on these cultural heritage assets as detailed in EIAR *Chapter 10: Cultural Heritage*. As discussed under NPF Policy 7 the Proposed Development is not expected to directly impact heritage assets, though minimal disturbance to buried archaeological remains during construction is possible. Minor changes to the settings of King's Yett Cairn, Dundaff Hill Mound, Dundaff Hill Enclosure, Stirling Castle, and Buckie Burn Sheiling-Hut are anticipated, but these are considered to have minimal impact on their cultural significance. Mitigation measures include appointing an Archaeological Clerk of Works, implementing protocols for discoveries, and using exclusion fencing. Overall, no significant adverse impacts on the integrity of the setting of Scheduled Monuments have been identified.
(viii) Effects on hydrology, the water environment and flood risk	Effects on hydrology, the water environment and flood risk have been assessed and are reported in EIA Report *Chapter 8:Hydrology, Geology and Hydrogeology*. This identified Major potential effects on water quality during construction and moderate effects during operation and decommissioning prior to mitigation reducing to minor or negligible following implementation of that mitigation. This mitigation includes the development of a Drainage Management Plan, Drainage Impact Assessment and Pollution Prevention Plan. These would be included as part of the CEMP with their implementation overseen by the EnvCoW. The SEPA Flood Map[1] indicates there is no mapped risk of river flooding, surface water flooding, or coastal flooding on the Proposed Development Site, other than in the watercourses on site. All watercourse crossings will be WAT-SG-25 compliant (SEPA, 2010), and designed to accommodate 1 in 200 year flood events, with 20% added for climate change.
(ix) Biodiversity including impacts on birds	*Chapter 6: Ecology* of the EIA Report assesses the effect of the Proposed Development on ecological, receptors, both concluding that, with mitigation, the Proposal Development will not have significant negative effects on habitats or protected species. *Chapter 7: Ornithology* of the EIA Report concluded that, with the implementation of good practice measures, there would be no significant negative effects on Important Ornithological Features (IOFs) as a result of the Proposed Development.
(x) Impacts on trees, woods and forests	The proposed northern access option (Option A) is routed through an area of ground which has recently undergone planting as part of the woodland grant scheme (WGS). Due to the recent nature of the

[1] Available at: https://beta.sepa.scot/flooding/flood-maps/

Policy Requirement	Compliance Summary
	planting, no trees are currently established on the site. Should use of the northern access option be proposed as part of the final setting out plans, a forestry management plan would be established, considering the status of the woodland at that time and proposing appropriate mitigation measures, such as compensatory planting, which would be agreed with relevant statutory bodies.
(xi) Proposals for the decommissioning of developments, including ancillary infrastructure, and site restoration	Upon ceasing operations, the wind farm will be decommissioned and above-ground infrastructure removed. Tracks and crane hardstands will remain and be grassed over or reseeded. Underground cables will be de-energised and left in place. Turbine foundations will be buried, and the area will be reseeded. A Decommissioning Method Statement will be prepared six months prior, and the process is expected to take up to 12 months. Further details can be found in EIA Report *Chapter 3: Description of Development*
(xii) The quality of site restoration plans including the measures in place to safeguard or guarantee availability of finances to effectively implement those plans	A Decommissioning Method Statement will be prepared six months prior, subject to approval from local authorities. The Applicant proposes that this is required by way of Planning Condition.
(xiii) Cumulative impacts	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 5-14 of the EIAR.

The socio-economic and community benefits of the Proposed Development are discussed above. A net economic impact will be positive through reducing the reliance on electricity generation on fossil fuels. This should have the ultimate effect of reducing the cost of electricity to the consumer.

It is clear within Policy 11 that the generation of renewable energy is recognised as being of national importance as:

> *"…significant weight will be placed on the contribution of the proposal to renewable energy generation targets and on greenhouse gas emissions reduction targets."(page 54)*

This demonstrates that the Proposed Development would meet Policy 11 of NPF4.

5.1.8 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."(page 74)*

The potential effects of the Proposed Development on flood risk and water management are evaluated within Chapter 8: Hydrology, Geology and Hydrogeology of the EIA Report.

This identified Major potential effects on water quality during construction and moderate effects during operation and decommissioning, reducing to minor or negligible following implementation of mitigation.

This mitigation includes the development of a Drainage Management Plan, Drainage Impact Assessment and Pollution Prevention Plan. These would be included as part of the CEMP with their implementation overseen by the EnvCoW.

The SEPA Flood Map indicates there is no mapped risk of river flooding, surface water flooding, or coastal flooding on the Proposed Development Site, other than in the watercourses on site.

All watercourse crossings will be designed in accordance with relevant guidance (WAT-SG-25), and designed to accommodate 1 in 200 year flood events.

This demonstrates that the Proposed Development would meet Policy 22 of NPF4.

5.1.9 NPF4 Policy 23: Health and Safety

Policy intended to;

> *"Protect people and places from environmental harm, mitigate risks arising from safety hazards and encourage, promote and facilitate development that improves health and wellbeing." (page 76)*

This policy encompasses development proposals which may generate changes in the level of noise, stating that;

> *"Development proposals that are likely to raise unacceptable noise issues will not be supported. The agent of change principle applies to noise sensitive development. A Noise Impact Assessment may be required where the nature of the proposal or its location suggests that significant effects are likely."(page 76)*

The likely effect of noise generation by the Proposed Development has been considered in both cumulative and isolative terms (Chapter 11: Noise). It is predicted that any noise associated with the operation of the Proposed Development will meet levels set out in legislative and professional guidance.

The potential effect of shadow flicker has been assessed within Chapter 14: Other Considerations of the EIAR. There are eight properties within potential shadow flicker distance of the Proposed Development.

Climate adjusted modelling demonstrates that no properties will experience adverse effects due to the shadow flicker, and that the number of affected hours per year will be within the accepted threshold in all cases. As such, no significant effects are anticipated as a result of the Proposed Development.

This demonstrates that the Proposed Development would meet Policy 23 of NPF4.

5.1.10 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." (page 79)*

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 construction phase of the Proposed Development is expected to generate additional economic benefits in terms of expenditure, employment, and Gross Value

Added (GVA). It is anticipated that throughout the lifecycle of the project it will generate employment opportunities and thus support the local economy.

These economic effects are likely to extend to the local supply chain, providing opportunities for businesses in the area. Additionally, the taxes borne as a result of the construction activities would contribute to the exchequer.

Furthermore, the Applicant is committed to providing a community benefit package for the Proposed Development, amounting to up to £5,000 per 30MW installed generating capacity per annum over the 40-year lifespan of the project (index linked from the commencement of operation). There is also an opportunity for the community to invest in a community share offer.

This demonstrates that the Proposed Development would meet Policy 25 of NPF4.

5.1.11 NPF Policy 29: Rural development

This policy intends to; "…*encourage rural economic activity, innovation and diversification whilst ensuring that the distinctive character of the rural area and the service function of small towns, natural assets and cultural heritage are safeguarded and enhanced."(Page 86)*

The Proposed Development is anticipated to generate employment opportunities throughout the different phases of the project and support the local economy. A detailed environmental impact assessment has been carried out to support the planning application which justifies the effects and measures considered to minimise the environmental impact.

The EIAR Chapter 5: Landscape and Visual and Chapter 10: Cultural Heritage assess the potential impact on the character of heritage sites, landscape, their settings and visual receptors. The iterative design process as detailed in the design and access statement evidences the efforts made in reducing and avoiding the adverse impact due to the proposed renewable energy generation project.

This demonstrates that the Proposed Development would meet Policy 29 of NPF4.

5.1.12 NPF4 Conclusions

The Proposed Development is considered to comply with the relevant policies of NPF 4. In particular:

- Policy 1 through the direct contribution to carbon reduction and renewable energy goals;
- Policy 2 through the design of the Proposed Development to allow for and to an extent help mitigate climate change;
- Policy 3 through the implementation of biodiversity and enhancement measures;
- Policy 4 through the avoidance of impact on designated sites, ecological and ornithological interests;
- Policy 5 through the minimisation of impacts on priority peatland;
- Policy 7 through the avoidance of significant effects on cultural heritage assets;

- Policy 11 through addressing the environmental impacts of the Proposed Development through project design and mitigation with significant residual effects being localised and acceptable within the terms of this policy;
- Policy 22 through the design of the Proposed Development to avoid effects on water management and to account for flood risk;
- Policy 23 through the protection of people and places from environmental harm, including unacceptable noise; and
- Policy 25 and 29 through the contribution to the local economy and implementation of a Community Benefit Fund and opportunity for share ownership.

6 Local Planning Policy

The adopted Local Development Plan comprises:

- Stirling Council Local Development Plan (SC LDP) (Adopted 2018); and
- Relevant supplementary guidance, including the SC Supplementary Guidance on Wind Energy Developments (2019).

6.1 Stirling Local Development Plan 2

The SC LDP was adopted in October 2018, setting out how SC sees the Stirling LDP area developing over the next 10-20 years.

Site selection was informed by the spatial framework within Stirling Council's (SC) Wind Energy Developments Supplementary Guidance (SC 2019), with the Proposed Development Site lying within Group 3 of the Spatial Framework, Areas with Potential for Wind Farm Development.

The following key policies have informed the design of the Proposed Development, on the assumption that these will be the policies against which the proposals will be reviewed. Where there is any inconsistency between the provisions of NPF4 and those of the LDP, the former will prevail as it is the later in date.

- Primary Policy 1: Placemaking;
- Policy 4.2: Protection of Carbon-Rich Soils;
- Primary Policy 5: Flood Risk Management;
- Primary Policy 6: Resource Use and Waste Management;
- Policy 7.1: Archaeology and Historic Building Recording (designated and undesignated buildings/sites) ;
- Policy 8.1: Biodiversity Duty;
- Policy 9.1: Protecting Special Landscapes;
- Primary Policy 12: Renewable Energy;
- Policy 12.1: Wind Energy Developments;
- Primary Policy 13: The Water Environment.

Each of the above policies is discussed in further detail in the below sections.

6.1.1 Primary Policy 1: Placemaking

Policy 1 requires all development to be; "*...designed and sited, not only with reference to their own specifications and requirements, but also in relation to the character and amenity of the place, urban or rural, where they are located.*"

The policy also requires the development to: "*Be of quality, having regard to any relevant design guidance, landscape character guidance, Conservation Area Character Assessments and Settlement Statements*".

The Applicant chose the Proposed Development Site because it has a commercially viable grid connection, good wind speed, available land, and is close to existing wind farms.

The site is also far enough from residential areas and has a good road network previously used for transporting wind turbine components.

Key constraints assessed during the design, pre-application, and Scoping process included:

- Landscape character and visual amenity;
- Ground conditions;
- Topography and peat;
- Proximity to noise-sensitive receptors;
- Presence of watercourses, private water supplies and related infrastructure;
- Sensitive ecology receptors;
- Cultural heritage features in the wider vicinity; and
- Telecommunication and aviation/radar constraints.

The Proposed Development site is located within a landscape which already hosts operational wind farms, with Craigengelt Wind Farm positioned adjacent to its southwest border.

Additionally, Earlsburn and Kingsburn Wind Farms form a cluster approximately 2km to 7km west/northwest of the site boundary. The Proposed Development, will be seen as an extension of the currently operating Craigengelt windfarm from most viewpoints.

The Proposed Development has been carefully sited and designed to take account of local surroundings and is considered to be compliant with Primary Policy 1.

6.1.2 Policy 4.2: Protection of Carbon-Rich Soils;

Policy 4.2: Protection of Carbon-Rich Soils requires that;

(a) The role of carbon-rich soils in storing carbon will be maintained by:

(i) Avoiding the disturbance or excavation of peat and carbon rich soils.

(ii) Protecting peat accumulations and high carbon content soils not already designated for habitat conservation reasons (i.e. Natura sites, SSSIs, Local Nature Conservation Sites and Geological Conservation Review Sites) from development or land use change.

(iii) Supporting proposals which include re-wetting and / or other restoration measures which provide a demonstrable carbon and / or biodiversity benefit.

(b) In relation to renewable energy developments, particularly wind energy, the Council will require developers to follow best practice for minimising carbon emissions and disturbance of peat. Detailed advice on current methodologies for the Scottish Government's 'carbon calculator' are referenced in the Glossary.

(c) Where peat and other carbon rich soils are present, applicants should submit a peat management plan to assess the likely effects of development on carbon dioxide (CO_2) emissions. Where peatland is drained or otherwise disturbed, there is liable to be a release of CO_2 to the atmosphere, development should minimise this release. The peat management plan must demonstrate that appropriate mitigation measures are in place to minimise by

avoidance impact on peat, including avoidance of development on areas of deep peat.

This policy is considered to mirror NPF4 Policy 5: Soils. The information presented in Section 5.1.5 therefore also demonstrates how the Proposed Development complies with Policy 4.2: Protection of Carbon Rich Soils.

6.1.3 Primary Policy 5: Flood Risk Management

Primary Policy 5: Flood Risk Management states that:

> "*(b) Development should be avoided in locations at medium to high flood risk (unless it accords with the risk framework in paragraph 236 of the Scottish Planning Policy) or where it would lead to an increase in the probability of flooding elsewhere*."

This policy is considered to mirror NPF4 Policy 22: Flood Risk and water management. The information presented in Section 5.1.8 therefore also demonstrates how the Proposed Development complies with Primary Policy 5: Flood Risk Management.

6.1.4 Primary Policy 6: Resource Use and Waste Management

Primary Policy 6: Resource Use and Waste Management requires that new development:

> "*(c) Should minimise waste at source during construction and operational phases and should, wherever possible, reuse materials on site, and include appropriate facilities for composting and for the sorting, storage and collection of waste.*
>
> (c) *Will, where appropriate, require to submit a Site Waste Management Plan proportionate to the scale of development*."

A Site Waste Management Strategy (SWMS) will be produced/adopted for the Proposed Development. The SWMS will be included as part of the final CEMP, and will include appropriate detail on how construction waste materials would be managed, including the management and definition of excavated materials.

The proposed development complies with Primary Policy 6: Resource Use and Waste Management.

6.1.5 Policy 7.1: Archaeology and Historic Building Recording (designated and undesignated buildings/sites)

Policy 7.1: Archaeology and Historic Building Recording (designated and undesignated buildings/sites) states:

> "*(a) There will be a presumption against development that would have an adverse effect on a scheduled monument or on the integrity of its setting except in exceptional circumstances. The same presumption will also apply to other nationally important monuments.* "

This policy is considered to mirror NPF4 Policy 7: Historic Assets and Places. The information presented in Section 5.1.6 therefore also demonstrates how the Proposed

Development complies with Policy 7.1: Archaeology and Historic Building Recording (designated and undesignated buildings/sites).

6.1.6 Policy 8.1: Biodiversity Duty

Policy 8.1: Biodiversity Duty states:

> *(a) All development proposals will be assessed for their potential impact upon biodiversity. This may be a specific impact on species or habitats at the proposed site, or cumulative impact if the species or habitats have a restricted distribution.*

Chapter 6: Ecology of the EIA Report assesses the effect of the Proposed Development on ecological, receptors, concluding that, with mitigation, the Proposal Development will not have significant negative effects on habitats or protected species. This includes cumulative impacts with other developments.

Technical Appendix 6-5 Outline HMP provides details of proposed heathland creation to bolster the Central Scotland Green Network (CSGN) and enhance the Proposed Development Site for Short-eared owl, proposed wet grassland creation to enhance the Proposed Development Site for upland wader species, and proposed installation of bat boxes to increase roosting opportunities.

The Proposed Development complies with Policy 8.1: Biodiversity Duty.

6.1.7 Policy 9.1: Protecting Special Landscapes

Policy 9.1: Protecting Special Landscapes states that:

> *"Decisions on development proposals within designated landscapes will take into account the level of importance and qualities of the designated area and the nature and scale of development … In all cases the siting and design of development within designated landscapes should be of very high quality and respect the special nature of the area…*
>
> *(b) Local Landscape Areas (LLAs) Development proposals will only be supported where it can be demonstrated that:*
>
> *(i) The landscape character, scenic interest and qualities for which the area has been designated will not be adversely affected.*
>
> *(ii) There is a specific nationally recognised need for the development at that location which could not be satisfied in a less sensitive area, and any adverse effects are clearly outweighed by social, environmental or economic benefits of local importance."*

Chapter 5: Landscape and Visual Impact Assessment of the EIA Report presents the findings of the assessment on the impact of the Proposed Development of LLAs and concludes that there will be some direct and very localised effects on the landscape fabric of the Southern Hills LLA and on landscape character.

However, as the Proposed Development is located in an area which has been altered by wind turbines (as recognised in the qualities of the designation), and will generally be seen as an extension to an operational wind farm in views both within and towards the LLA, this is not judged to significantly alter the overall integrity of the Southern Hills LLA.

Furthermore, the experience of the LLA from large areas of the LLA, to the west of the operational Craigengelt Wind Farm, will not be altered.

In addition, the transitionary provisions detailed in Section 5.1 above mean that there is a potential conflict with this policy and NPF4 Policy 11, in which the NPF4 Policy would have primacy, making the localised nature of the impacts acceptable in policy terms.

6.1.8 Primary Policy 12: Renewable Energy

The primary policy states that renewable energy developments which contribute towards these targets will be supported where they comply with policies 12.1 or 12.2 (where appropriate) and with all other relevant LDP policies.

Policy 12.1: Wind Energy Developments requires;

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

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

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

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

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

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

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

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

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

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

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

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

(ii) Landscape and visual impacts.

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

(iv) Historic environment.

(v) Aviation and telecommunication interests.

(vi) Residential and community amenity.

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

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

(ix) Road traffic and adjacent trunk roads.

(x) Hydrology and flood risk.

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

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

(xiii) Tourism and recreation interests

The Proposed Development is located within the Spatial Framework Map for Onshore Wind Energy, classified under Scottish Planning Policy Group 3 Area, indicating potential for wind farm development subject to detailed consideration against specific policy criteria.

It is important to note that the spatial framework was developed in accordance with the now-superseded Scottish Planning Policy (SPP), and the areas identified may not fully align with the principles outlined in NPF4. The Proposed Development has been assessed against the relevant policies in NPF4 in section 5 National Planning Policy above.

A review of the Proposed Development against the provisions of this policy is presented in Table 2 below.

Table 2: Proposed Development Compliance with Policy 12.1(c)

Policy Requirement	Compliance Summary
(i) Contribution to renewable energy generation targets and effect on greenhouse gas emissions	The Proposed Development, as a renewable energy generator, aligns with Scotland's climate change adaptation efforts by producing electricity from renewable sources. It supports the Scottish Government's goal of deploying 20GW of onshore wind by 2030, as outlined in OnWPS 2022. The EIAR *Chapter 13: Climate Change and Carbon Balance* details that, the Proposed Development will directly contribute to addressing the global climate emergency, significantly reducing Scotland's CO_2 emissions. With an estimated renewable energy generation capacity of approximately 30MW, it is projected to produce 91,980 MWh annually, representing the potential to power approximately 24,859 households in Scotland each year. Considering its potential for renewable energy generation and carbon displacement, the Proposed Development is expected to offset its carbon cost within 3.3 years compared to grid mix electricity generation.
(ii) Landscape and	The landscape and visual effects of the Proposed Development have been

Policy Requirement	Compliance Summary
visual impacts	thoroughly assessed and supported by methodologies outlined in EIA Report *Chapter 5: Landscape and Visual Impact Assessment* and appendices. Significant effects are predicted from a very localised area around the Site and to the northeast of the eight turbine Craigengelt Wind Farm (extending to the eastern boundary of the host LCT and approximately 4km to the north, in the Touch Hills). In terms of wider effects on the host LCT, these are predicted as being Not Significant (Minor). While moderate landscape effects are expected, the development is seen as an extension of existing wind farms, with minimal impact on National Scenic Areas. Visual effects are notable within proximity to the development but generally the Proposed Development blends with existing wind farms. Significant (Moderate and above) effects on views are predicted at five of the 16 representative viewpoints. The majority of significant visual effects are contained within 6km and represent closer proximity and more open views (Viewpoints 1 to 4). Significant Landscape and Visual effects are therefore limited and localised.
(iii) Effects on natural heritage including wild land areas, the quality of the water environment and carbon rich soils	The effects on the natural heritage including Wild Land Areas, the quality of the water environment and carbon rich soils have been thoroughly assessed and supported by methodologies outlined in EIAR Chapter 6 – Ecology, *Chapter-7: Ornithology*, *Chapter 8: Hydrology, Geology and Hydrogeology* and supporting technical appendices. No significant residual effects are predicted for natural heritage interests or the water environment and the site is not located in nor in close proximity to a Wild Land area. The effects on carbon rich soils are discussed in Section 5.1.5 above.
(iv) Historic environment	The Proposed Development underwent a comprehensive assessment of its impact on the historic environment, as detailed in EIAR *Chapter 10: Cultural Heritage*. This assessment indicates that there will be no direct impact on heritage assets. Although there may be minor disturbance to unknown buried archaeological remains during construction and anticipated minor changes to the settings of specific sites, such as King's Yett Cairn and Stirling Castle, these will have minimal effect on their cultural significance. The CEMP details about the measures taken to address these potential impacts, measures have been put in place, including appointing an ACoW and establishing discovery protocols. Overall, there will be no significant adverse impact on the integrity of the setting of any Scheduled Monuments.
(v) Aviation and telecommunication interests	Aviation and telecommunication considerations were thoroughly assessed in EIAR *Chapter 14: Other Considerations*. Consultations with NATS and telecommunications operators influenced the final design of the Proposed Development. Mitigation measures, including a bespoke aviation safety lighting scheme will be implemented. Stakeholder feedback helped ensure that the Proposed Development will not adversely impact aviation or telecommunication operations.
(vi) Residential and community amenity	The effects on residential and community amenity have been assessed as part of the EIAR *Chapter 5: Landscape & Visual Impact Assessment* and are detailed within *Technical Appendix 5-2: Residential Visual Amenity Assessment* (RVAA). The assessment concludes that the Proposed Development will not exceed the threshold for residential visual amenity effects.
(vii) Net economic impact, including local and	*Chapter 12: Socio-economics, Tourism, and Recreation* of the EIAR focuses on, highlighting the socio-economic benefits of the Proposed Development, which include:

Policy Requirement	Compliance Summary
community socio-economic benefits such as employment, associated business and supply chain opportunities	Establishment of a community fund, allocating £5,000 per each installed generating capacity of up to 30 MW over the 40-year lifespan for local initiatives plus the offer of a community shared ownership scheme. Creation of employment opportunities during the development, construction, and operational phases, with contractors expected to hire local residents, potentially providing up to five, 34 and six (per annum) jobs respectively. Opportunities for the local supply chain and additional tax revenue contributing to community benefit funds. Income generation through new employment, leading to additional wages and salaries, much of which is expected to be spent regionally or nationally.
(viii) Public access, including impact on long distance walking and cycling routes and scenic routes identified in NPF	The potential impact on public access has been thoroughly assessed across various sections of the EIAR, including *Chapter 9: Transport & Access*, *Chapter 12: Socio-economics Tourism and Recreation*, and the *Design & Access Statement*. It has been established that no walking routes will be disrupted by the construction of the Proposed Development, as there are no paths within the development area. Furthermore, the Applicant is open to considering promoting pedestrian access by utilising the access tracks of the Proposed Development. Additionally, they are committed to providing and maintaining public access to the newly created access track network through waymarked trails, signage, and interpretation boards as necessary. Therefore, it is anticipated that the Proposed Development will have no significant effect on public access.
(ix) Road traffic and adjacent trunk roads	The potential effects on traffic have been evaluated in EIAR *Chapter 9: Transport & Access*. As per the assessment, the primary impacts are mainly during the construction phase which is anticipated to last for 12 months and involve both the delivery of materials to the site and the daily movement of site staff. The assessment concluded that, with the implementation of suitable mitigation measures, such as a Construction Traffic Management Plan (CTMP), no significant residual effects are anticipated regarding traffic and transport.
(x) Hydrology and flood risk	Effects on hydrology, the water environment and flood risk have been assessed and are reported in EIA Report *Chapter 8:Hydrology, Geology and Hydrogeology*. This identified Major potential effects on water quality during construction and moderate effects during operation and decommissioning prior to mitigation, reducing to minor or negligible following implementation of that mitigation. This mitigation includes the development of a Drainage Management Plan, Drainage Impact Assessment and Pollution Prevention Plan. These would be included as part of the CEMP with their implementation overseen by the EnvCoW. The SEPA Flood Map indicates there is no mapped risk of river flooding, surface water flooding, or coastal flooding on the Proposed Development Site, other than in the watercourses on site. All watercourse crossings will be WAT-SG-25 compliant (SEPA, 2010), and designed to accommodate 1 in 200 year flood events, with 20% added for climate change.
(xi) Cumulative Impacts, arising from the above considerations	The potential for cumulative effects arising from the Proposed Development has been thoroughly assessed and addressed in Chapters 5 to 14 of the EIAR, with appropriate mitigation measures implemented. All residual effects are assessed as localised or Non-Significant.
(xii) The need for planning conditions relating to	As outlined in EIAR *Chapter 3: Description of Development*, after the Proposed Development ceases operation, the wind farm will be decommissioned, and above-ground infrastructure dismantled and removed from the site.

Policy Requirement	Compliance Summary
decommissioning and site restoration	Tracks and crane hardstands will either be left in place and allowed to grass over or covered with soil and reseeded, unless required for ongoing land management operations. All underground cables will be de-energized and left in place. The upper sections of turbine foundations will be buried to allow for current land use practices. Peat or topsoil will be replaced, and the area reseeded. A Decommissioning Method Statement will be prepared at least six months prior to decommissioning. This process is estimated to take up to 12 months.
(xiii) Tourism and recreation interests	The potential effects on tourism and recreation interests have been evaluated in EIAR *Chapter 12: Socio-economics, Tourism, and Recreation* and concluded that there will be no adverse effect is envisaged on the tourism industry due to the Proposed Development. This chapter encompasses the studies from Glasgow Caledonian University and the report from Scottish Parliament's Economy, Energy, and Tourism Committee (2012), to conclude that the Proposed Development will not harm the tourism industry.. The chapter also included more recent research by BiGGAR Economics (2021) which examined 44 wind farm case studies in Scotland and found no evidence of a negative impact on tourism employment. Analysis at the local authority level also showed no overall relationship between wind turbine growth and tourism-related employment. Specifically, in Stirling, where 21 wind turbines were constructed between 2009 and 2019, tourism sector employment increased by 48.8%. Overall, the research confirms that the tourism sector in Scotland is not adversely affected by onshore wind farms and has continued to grow alongside their deployment. As noted above the creation of a network of tracks offers the opportunity of enhanced recreational access in the area.

The Proposed Development complies with Policy 12.

6.1.9 Primary Policy 13 The Water Environment

Primary Policy 13 states that

> *"(a) All development must protect and enhance, by minimising and mitigating any potential impacts, the physical, chemical and biological quality of the water environment (all rivers, lochs, streams, groundwater, estuaries and wetlands).*
>
> *(b) The Stirling area includes important areas for local and regional drinking water supply catchments. Development proposals must have regard to potential adverse impacts on drinking water supply catchments, including private licensed supplies"*

Effects on the water environment and flood risk have been assessed and are reported in EIA Report Chapter 8: Hydrology, Geology and Hydrogeology. Major potential effects on water quality were identified during construction and moderate effects during operation and decommissioning. The implementation of mitigation measures will reduce these effects to Minor or Negligible and Not Significant.

Effects on Private and Public water supplies are also included in the assessment. The assessment identified that Muirpark Farm spring Private Water Supply (PWS) is potentially in hydrological connectivity, as is the Muirpark unregistered pond.

Predicted effects on the PWS are regarded as unlikely, as the source is upgradient of infrastructure. However, given the lack of exact source location, the assessed predicted effect will have a precautionary component. Effects would then be adverse, medium term and indirect.

The unregistered pond is adjacent to watercourse crossing 3 (WC3) and has the potential to be affected by temporary flow changes and risks from sediment and other pollution associated with the watercourse crossing and track upgrading. The pond is not a PWS and is of purely agricultural use.

Accordingly mitigation will be applied through the instigation of an appropriate monitoring regime, development of a detailed risk assessment and measures to mitigate any impact based on that assessment. Measures could include:

- Development of methods to safeguard spring water supply, such as avoiding dewatering or physical cut-off in areas adjacent to the PWS;
- Minimising lengths and depths of drainage ditches to reduce any potential lowering of the water table;
- Development of procedures to protect any supply pipe which may be intersected by infrastructure; and
- Informing construction workers of the necessity to protect and prevent pollution from impacting upon the PWS.

The Proposed Development Site is not hydraulically connected to the Craigengelt DWPA, or to Buckieburn or Loch Coulter reservoirs. However, those parts of the Proposed Development Site that lie within the Bannock Burn catchment are hydraulically connected to the North Third reservoir located <1km downgradient of the Proposed Development Site.

Scottish Water has confirmed that North Third reservoir and Loch Coulter reservoirs are not in use to supply the public. Their catchments are not Drinking Water Protected Areas (DWPA) under Article 7 of the Water Framework Directive.

The magnitude of potential predicted effects on public water supply water quality is therefore Not Significant.

The Proposed Development is compliant with Primary Policy 13.

6.1.10 LDP Conclusions

The Proposed Development is considered to be compliant with the relevant policies of the LDP. This includes Primary Policy 9 when taking the provisions of NPF 4 Policy 11 regarding the acceptability of localised landscape and visual impacts into account.

6.2 Stirling Council Wind Energy Developments Supplementary Guidance (SG) (2019)

The SC Wind Energy Developments Supplementary Guidance (SC 2019) was produced in February 2019.

The Proposed Development sits within the Spatial Framework Map for Onshore Wind Energy produced by SC in August 2016, illustrating that the Proposed Development Site

is not located within either '*Group 1 Areas where wind farms will not be acceptable*' or '*Group 2 Areas of Significant Protection*'.

As such, it falls under Scottish Planning Policy '*Group 3 Area with potential for wind farm development*', subject to detailed consideration against identified policy criteria.

It is noted, however, that the spatial framework was developed in accordance with SPP which is now superseded and the areas identified within the framework may be incompatible with the principles identified in NPF4.

The Guidance is therefore considered to provide an indication of SC's view on the potential acceptability of wind energy developments in a particular area as opposed to a policy on the spatial approach to wind energy development.

The Proposed Development lies to the immediate north-east of the operational Craigengelt Wind Farm, for which SC provides the following guidance in relation to potential extension: "*Limited expansion of the Craigengelt development, of say 2-3 turbines closely related to the existing layout, may be capable of being absorbed into the area without substantially altering the existing balance between developed and undeveloped areas.*"

Whilst the Proposed Development is for up to four wind turbines, it would still generally be read as an extension of Craigengelt Wind Farm. In many views, the Proposed Development is largely contained within the horizontal field of view occupied by turbines in this operational scheme.

7 Conclusion

This Planning Statement has sought to identify and apply the key considerations applicable in the determination of the planning application for the Proposed Development including the policies and provisions of the statutory Development Plan consisting of NPF 4 and SC LDP2 and supplementary guidance.

The assessment has taken account of the Scottish Government's guidance on the transitional arrangements for the implementation of NPF4 where the provisions of NPF4 would prevail over the LDP2 policies in the event of any incompatibility.

The Proposed Development will make a valuable contribution to Scotland's national renewable electricity and emissions reduction targets, and to those of Stirling Council, as set out in the Climate and Nature Emergency Plan, 2021-45 (Stirling Council, 2022).

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".

There is a need to apply significant weight to the emphasis which must be placed 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.

Furthermore, clear direction regarding the approach which 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, with a contracted grid connection date of late 2026, the Proposed Development presents the opportunity to make a direct contribution to achieving renewable energy deployment and carbon reduction objectives before 2030.

The assessment against each of the relevant policies of the Development Plan has been undertaken demonstrating that the Proposed Development complies with the plan.

There is considered to be significant overlap and limited conflict between the relevant National and local policies, with only the provision in NPF4 Policy 11 in respect of the acceptable nature of localised impacts offering a substantive difference in the approach to assessing landscape and visual impacts.

In line with section 24 of the Planning Act, this provision would take precedence in the assessment against Primary Policy 9 of the LDP. The EIA Report clearly demonstrates that significant landscape and visual impacts would be localised in nature and therefore acceptable under the terms of Policy 11 of NPF4.

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