

Jane Brooks-Burnet  
Stirling Council  
Teith House  
Kerse Road  
Stirling FK7 7QA

CBC House  
24 Canning Street  
Edinburgh  
EH3 8EG

Our ref: 40419

Your ref: 24/00494/FUL

T: 0131 346 9100  
E: [edinburgh@atmosconsulting.com](mailto:edinburgh@atmosconsulting.com)  
[www.atmosconsulting.com](http://www.atmosconsulting.com)

**28/11/2025**

Dear Jane

### **Drummarnock Wind Farm - NatureScot Response**

I refer to the email dated 12 September 2024 from NatureScot (NS) to Stirling Council in response to the consultation on the application for Planning Permission for Drummarnock Wind Farm (Planning Reference: 24/00494/FUL, the 'Proposed Development'). Having considered the issues raised, the Applicant wishes to make the following representation.

We note that NatureScot have not objected to this application and their commentary is framed as recommendations only.

The Applicant infers that NatureScot do not take issue with the principle of the development in its current form and only state their recommendations for reducing the impact and improving the enhancement offered by the Proposed Development are properly considered by the Applicant. We assume that Stirling Council shares this interpretation.

We note NatureScot's agreement that their advice issued as part of the Environmental Impact Assessment (EIA) Scoping exercise has been followed and that they concur with our findings that the Proposed Development will have limited to no impact on protected species and designated Sites.

The Applicant has given careful consideration to NatureScot's recommendation for a more ambitious peatland restoration targets and firmer biodiversity enhancement commitments and has sought to address these recommendations to the extent that it is possible within the constraints imposed by the Site.

## Peatland Restoration

In their response NS states:

*“...our peatland guidance provides our recommendations on the level of restoration needed to achieve compensation (1:10 ratio of area of peatland lost:area of peatland restored) and to achieve additional biodiversity enhancement (a further 10% of the baseline extent of priority peatland habitat). As detailed in the report, the priority peatland loss (M19, M20 and M25) accounts for 10.2ha and the compensation/enhancement intended accounts for 15.9ha, which falls beneath this threshold. While we note that opportunities on-site for peatland restoration are considered to be limited, we would therefore advise that the applicant look towards off-site opportunities for providing restoration that can meet the recommendations set out in our peatland guidance and to include this in the Outline Habitat Management Plan. This should be agreed prior to determination of this proposal.”*

The Applicant notes that NS acknowledge the limited opportunities on site for peatland restoration and are aware the loss to restoration ratio falls below the recommended ratio in the guidance.

Consideration has been given to seeking offsite peatland restoration. The Applicant has conducted a search for existing peatland restoration schemes in the wider geographical area with the intention of seeking to contribute to existing restoration schemes. Such schemes are limited in number and present significant commercial and practical viability issues.

Due to the lack of off-site opportunities, the Applicant has reviewed the design of the Proposed Development resulting in the Amended Design presented in the Additional Information submission. The Amended Design has sought to further maximise on-site opportunities, including peatland restoration through borrow pit reinstatement and sustainable peat storage.

Accordingly, the Applicant has been able to reconfigure elements of the design to increase the area of peatland restoration from 15.9 ha to 21.5 ha. Resulting in an increase of the loss to restoration ratio from 1:1.5 to 1:2.06, a meaningful increase from what it was previously and the overall significant enhancement is deemed to be compliant with NPF4 policy.

## Turbine 3 Location and Deep Peat

In their response, NatureScot states: *“We advise that areas of deep peat be avoided in line with the mitigation hierarchy... we advise that the applicant considers relocating Turbine 3 in order to avoid any areas of deep peat.”*

The Applicant has carefully considered the location of Turbine 3 (T3) through a detailed analysis of applicable constraints and applied the mitigation hierarchy throughout the design process.

Turbine 3 is currently located on peat between 0.5–1 m depth, with most infrastructure on the southern side of the track and the blade/nacelle storage area on the northern side.

The primary consideration for its location is the avoidance of the point-to-point fixed telecommunications link to the southwest (Ref. 1082233/2), while also minimising encroachment on nearby watercourse buffers to the north and south, highly dependent Ground Water Dependent Terrestrial Ecosystem (GWDTE) to the immediate north, and areas of deeper peat of up to 1.5m depth to the north, east and south.

These constraints are illustrated in Figure 1-5: T3 Constraints (Appendix A).

Relocating the turbine north to the other side of the track would encroach upon a 50 m watercourse buffer and cause direct and indirect loss of highly dependent M6d GWDTE habitat in the elongated valley bottom to the north. Moving northwest would place the turbine on peat up to 2 m deep, offering little or no benefit in reducing deep peat impact.

The Applicant is of the view that the location of the turbine has been optimised to minimise the impact on the environment as a whole. The current location of Turbine 3 has been designed to minimise environmental impacts, is appropriate and compliant with guidance. Any movement of Turbine 3 is anticipated to result in greater environmental impacts due to other constraints on Site.

## **Biodiversity Enhancement**

In their response, NS advises; “...that the proposal include further biodiversity enhancement measures and firm commitments in order to reach the level set out within the planning framework.”

It should be noted that National Planning Framework 4 (NPF4) does not specify a ‘level’ for biodiversity enhancement. With Policy 3(b) only requiring that; “...the proposal will conserve, restore and enhance biodiversity, including nature networks so they are in a demonstrably better state than without intervention.”

The Applicant’s position is that the Proposed Development definitively meets this policy test without the need for further measures.

However, the Applicant, has considered NS’ request for additional measures, and has been able to secure the following additional measures:

- Peatland restoration through increasing water levels in existing ditches and enhancement of M20 degraded blanket bog;
- Provide and maintain an area of 25.5ha of suitable breeding habitat for Short-eared owl in an area away from the influence of the wind turbines and the land management practices of the surrounding area; and
- Provide and maintain an area of 15.8ha of wet grassland as breeding habitat for waders in an area away from the influence of the wind turbines and the land management practices of the surrounding area.

These measures have been incorporated into an updated Outline Habitat Management Plan included Additional Information submission as Technical Appendix 3.

We trust that the information provided offers sufficient reassurance and confirms that NatureScot’s concerns have been fully addressed.

Yours sincerely

Jack Graham

**Senior Consultant**



CBC House  
24 Canning Street  
Edinburgh  
EH3 8EG

E [planning@atmosconsulting.com](mailto:planning@atmosconsulting.com)

W [www.atmosconsulting.com](http://www.atmosconsulting.com)

### **Enclosed:**

Appendix A – T3 Constraints Plan

# Appendix A

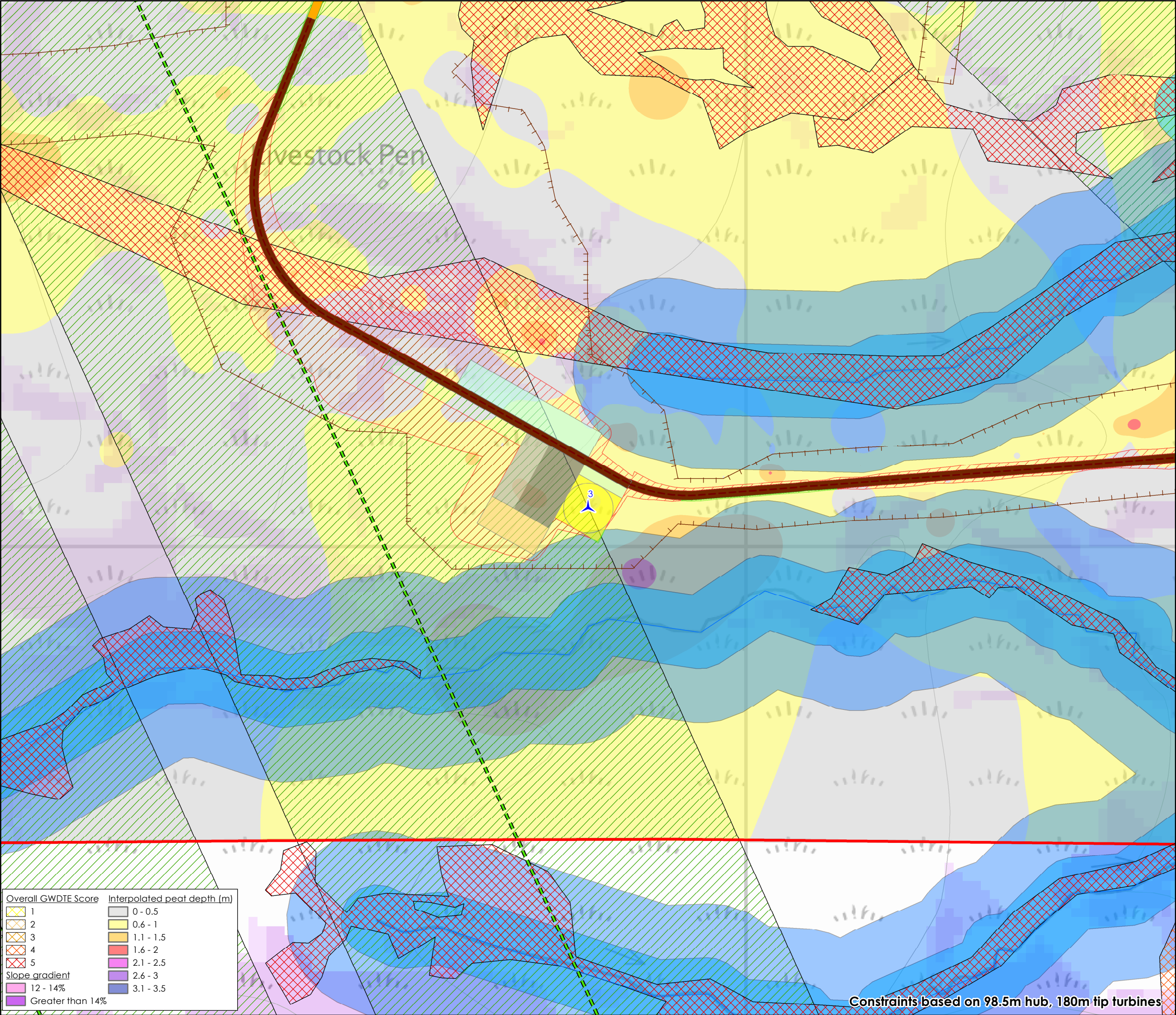
**See Next Page**



Drummarnock  
Wind Farm

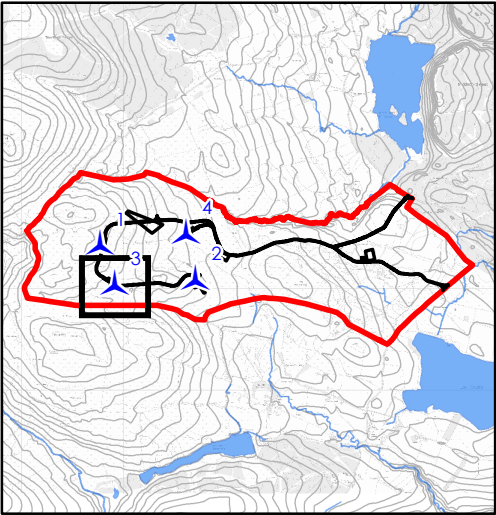
wind2

Figure 1-5  
T3 Constraints

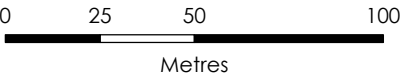


**Key**

- Site boundary
- Proposed Turbine
- Turbine foundation
- Crane hardstanding
- Auxiliary crane hardstanding
- Blade storage area
- Nacelle storage area
- Tower storage area
- Earthworks - cut
- Earthworks - fill
- Onsite access track - cut
- Onsite access track - floating
- Fixed Communications Link
- Phase 2 peat survey extents
- Constraint buffer
  - 20m from 1:10k watercourse
  - 50m from 1:50k watercourse
  - 111.5 - 136.5m from Fixed Communications link



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Scale @ A3:  
1:2,000



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17/07/2025 TL026 40419/CP/136a  
Drawn by: LB Checked by: TH Approved by: JG

Constraints based on 98.5m hub, 180m tip turbines

Overall GWDTE Score	Interpolated peat depth (m)
1	0 - 0.5
2	0.6 - 1
3	1.1 - 1.5
4	1.6 - 2
5	2.1 - 2.5
	2.6 - 3
	3.1 - 3.5

**Slope gradient**

- 12 - 14%
- Greater than 14%