

**BODINGLEE WIND FARM
SECTION 36 APPLICATION**

PLANNING STATEMENT ADDENDUM



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EXECUTIVE SUMMARY

This Planning Statement Addendum sets out the planning case for Bodinglee Wind Farm, following the Design Changes introduced post-submission. These changes, which include the removal of two turbines and the reduction in height of nine turbines, have reduced impacts on cultural heritage assets including Auchensauth Hill cairn, landscape and visual receptors, and peatland habitat. The Design Changes have responded directly to consultee feedback and, as a result, Historic Environment Scotland (HES) has confirmed they would be in a position to withdraw their objection.

The addendum focuses on the key material considerations weighed in the balance of issues, considering the residual significant environmental effects (relating to cultural heritage and landscape and visual impacts only) of the Revised Proposed Development against the significant scale and number of benefits it will deliver with regards to the contributions it will make to: renewable energy generation targets (245 megawatts (MW) of onshore wind and 100 MW of battery storage capacity national carbon emissions reductions targets, socio-economic benefits, environmental protection and enhancement, nature restoration, and wide range of community benefits relating to access, recreation, landscape enhancement cultural heritage, climate adaptation and the local economy.

This addendum reaffirms the position in favour of consenting the Revised Proposed Development, highlighting the thorough design process which has been undertaken to respond to statutory consultee consultation responses and the mitigation of environmental effects. The Design Changes (in additions to previous design iterations set out in the 2023 Planning Statement) incorporated in the Revised Proposed Development will further reduce the residual adverse impacts on landscape and visual and cultural heritage receptors.

This addendum reaffirms the high-level support afforded to the Revised Proposed Development by national planning policy as set out in NPF4, particularly in terms of renewable energy generation and contributions to fighting the increasingly urgent threat of the climate emergency. The Revised Proposed Development will make an important contribution towards delivering the change required by the Climate Change (Emissions Reductions Targets) (Scotland) Act 2019, reflected in national energy, climate, industrial and economic policy, which all support the need case for renewable energy development to achieve net zero by 2045.

The thorough iterative design process of the 2023 Proposed Development and the Revised Proposed Development demonstrates that appropriate design mitigation has been applied, whilst maintaining the important contributions to renewable energy and emissions reduction targets. The Revised Proposed Development will deliver significant benefits which, it is considered, outweigh the residual significant effects (landscape and visual and cultural heritage only). It is concluded that the Revised Proposed Development accords with the statutory Development Plan, when read as a whole, as well as the individual policy tests of relevant policies, including NPF4 Policy 11 (Energy), Policy 4 (Natural places) and Policy 7 (Historic assets and places), and the relevant policies of the South Lanarkshire Local Development Plan 2 (SLLDP2).

As such, it is respectfully recommended that consent is granted for the Revised Proposed Development.



1. INTRODUCTION

SUMMARY

This section provides an overview of the purpose of this Planning Statement Addendum, summarises design changes to the Revised Proposed Development and sets out the structure and content of the Addendum.

PURPOSE OF THIS PLANNING STATEMENT ADDENDUM

- 1.1 This Planning Statement Addendum has been prepared by LUC on behalf of the Applicant, OnPath Energy, to support the application to Scottish Ministers for consent to construct and operate Bodinglee Wind Farm (hereafter referred to as ‘the Revised Proposed Development’) under Section 36 of the Electricity Act 1989 (‘the Act’). This Addendum has been produced in response to design changes proposed by the Applicant (hereafter referred to as ‘the Design Changes’).
- 1.2 In June 2023, OnPath Energy (Bodinglee Wind Farm) Limited (formerly Banks Renewables) (Bodinglee Wind Farm Limited) (hereafter referred to as ‘the Applicant’) submitted an application to the Scottish Government Energy Consents Unit (ECU) under Section 36 of the Act for the construction and operation of a 37 turbine wind farm with a generating capacity of approximately 259-megawatt (MW) and a Battery Energy Storage System (BESS) of approximately 100MW (ECU application reference ECU00004839). The application also applies for direction under Section 57(2) of the Town and Country Planning (Scotland) Act 1997 for planning permission for the development to be granted.
- 1.3 Bodinglee Wind Farm, as originally proposed (hereafter referred to as the ‘2023 Proposed Development’), was considered to be acceptable in relation to Schedule 9 of the Electricity Act 1989 when evaluated against key material considerations, including renewable energy and climate change policy, and considered against the key determining policies of NPF4 and the South Lanarkshire Local Development Plan 2, on balance with its anticipated positive benefits. The likely significant environmental effects of the 2023 Proposed Development were identified to be limited to landscape and visual and historic environment only.
- 1.4 Since submission of the 2023 Proposed Development, requests for design modifications have been received through statutory consultation requests. In response to this feedback, the Applicant has undertaken a number of changes to the design of the 2023 Proposed Development. The Design Changes include the removal of two turbines, and reductions in the maximum height to blade tip of nine turbines. Within this context, this Planning Statement Addendum sets out the updated case for the Revised Proposed Development (as submitted through the Further Environmental Information process). It acts as an update to the original Planning Statement, submitted to the ECU to support the 2023 Proposed Development (‘the 2023 Planning Statement’) and, as such, the two documents should be read in conjunction.
- 1.5 This Planning Statement Addendum should also be read in conjunction with the 2025 Further Environmental Information (FEI) (FEI Report), which forms an Addendum to the Bodinglee Wind Farm 2023 Environmental Impact Assessment Report (2023 EIA Report). As such, it should also be read in conjunction with the originally submitted



2023 EIA Report and all relevant supporting documents including the Socio-Economic Report, Sustainable Design and Planning Benefits Document and Pre-Application Consultation (PAC) Report.

THE REVISED PROPOSED DEVELOPMENT

- 1.6 The Revised Proposed Development consists of 35 turbines: 9 with tip heights of 210 metres (m), 11 with tip heights of up to 230m and 15 with tip heights of up to 250m. The design and layout of the Revised Proposed Development has been developed as a result of an iterative design process, taking into account the feedback received from statutory consultees following submission of the 2023 application (the 'Design Changes').
- 1.7 Details of the Design Changes are outlined in full in Chapter 2 of the 2025 FEI Report (see FEI Report Figure 2.1). The key changes between the 2023 Proposed Development and Revised Proposed Development are:
- The number of turbines has been reduced from 37 to 35 turbines (with turbines T9 and T10 removed from the layout).
 - The maximum tip height of turbines T5, T6, T7, T13, T14, T15, T18, T22 and T32 have been reduced from 230-250m to 210m.
 - Track layout amendments including additional areas of floated track, removal of track travelling through areas of peatland habitat towards T35 and T36; and an additional watercourse crossing.
 - Amendments to temporary construction infrastructure including removal of Borrow Pit 09 (BP09) and relocation of Construction Compound 4 (CC4).
- 1.8 **Table 1** below highlights the key turbine Design Changes between the 2023 Proposed Development and Revised Proposed Development.

Table 1: Design Revisions

	Turbine	2023 Proposed Development – Turbine Tip Height (m)	Revised Proposed Development – Turbine Tip Height (m)
Bodinglee West	1	230	230
	2	250	250
	3	230	230
	4	230	230
	5	250	210
	6	250	210
	7	230	210
	8	230	230
	9	250	Turbine removed.
	10	230	Turbine removed.
	11	250	250
Bodinglee East	12	230	230
	13	230	210



	14	230	210
	15	230	210
	16	230	230
	17	250	250
	18	250	210
	19	250	250
	20	250	250
	21	250	250
	22	250	210
	23	230	230
	24	250	250
	25	250	250
	26	250	250
	27	250	250
	28	250	250
	29	250	250
	30	250	250
	31	250	250
	32	250	210
	33	230	230
	34	230	230
	35	250	250
	36	230	230
	37	230	230

1.9 Further details of the design of the Revised Proposed Development are contained within Chapter 2 of the 2025 FEI Report, with details of the post-submission design evolution provided in Chapter 3. This includes a summary of consultee feedback, design strategy, and subsequent design modifications to reach the Revised Proposed Development.

1.10 The key environmental receptors highlighted during the consultation process, and which have informed the Design Changes for the Revised Proposed Development are:

- Auchensaugh Hill Cairn Scheduled Monument;
- Upper Clyde Valley and Tinto Special Landscape Area (SLA);
- The presence of priority habitats and protected species;
- Ornithological receptors; and
- Avoidance of areas of deeper peat.

1.11 The principles of the design strategy (see 2025 FEI Report Chapter 3) were to arrange turbines and other infrastructure to maximise energy yield whilst further minimising



environmental effects on the above receptors. The iterative design process also considered the various economic, technical and environmental factors.

- 1.12 **Table 2** below sets out a high-level overview of statutory consultee comments received in relation to the 2023 Proposed Development and how these have been addressed as part of the Revised Proposed Development. Detailed consultee feedback is provided or signposted within the respective topic chapters of the 2025 FEI Report where relevant and in FEI Technical Appendix 3.1 Consultation Response Log. Specific responses and proposed Design Changes are considered further within **Chapter 3: Policy Appraisal** of this Planning Statement Addendum.

Table 2: Summary of Statutory Consultee comments and design response

Consultee	Comments	Response
NatureScot	<p><u>Consultation response dated 17th October 2023</u></p> <p><u>LVIA</u> No objection on LVIA grounds, however advisory notes were provided on the scale and siting of proposed turbines, because of detracting from appreciation of Tinto and Dungavel Hills. Significant visual effects from the summit of Dungavel and Tinto and concerns over potential effect on integrity of the Upper Clyde Valley and Tinto Special Landscape Area (SLA) special qualities</p> <p><u>Ornithology</u> Objection on ornithological grounds. Requested that Ornithology Collision Risk Modelling needs to be re-run - Muirkirk and North Lowther SPA and SSSI population viability and integrity of the site's conservation objectives.</p> <p><u>Habitat Management Plan</u> Revisions to the Habitat Management Plan (HMP) are required.</p>	<p><u>LVIA</u> T13-15 and T18 and T22 have been reduced in height to 210m which will help to address the concerns relating to the scale and siting of the proposed turbines in relation to the identified receptors.</p> <p>Chapter 4 LVIA provides a re-assessment of likely effects as a result of the Design Changes. Paragraphs 4.41-4.47 set out the findings of the assessment regarding the effects on the SLA.</p> <p><u>Ornithology</u> Full re-run of Collision Risk Modelling (CRM) has been undertaken and provided with the FEI submission.</p> <p><u>Habitat Management Plan</u> HMP has been revised and addresses recent changes to guidance and provides additional detail as recommended by NatureScot.</p>
Scottish Environmental Protection Agency (SEPA)	<p><u>Consultation response dated 7th December 2023</u></p> <p>Confirm that, in general, the site layout has avoided areas of deep peat. However, T9 (2.35 m average peat depth as shown in table 10.11) and to a lesser extent T1 (1.01 average peat</p>	<p>T9 and the associated infrastructure, such as crane pads and access tracks, have been removed from the Revised Proposed Development. As such, this</p>



	<p>depth) appear to be located on peat greater than 1m depth</p> <p>Holding objection related to T9 - If peat over 1.0 metre cannot be avoided then Turbine should be removed.</p>	<p>addresses the points raised by SEPA in relation to deeper peat.</p> <p>For T1, a commitment has been made to micro-siting, if required following Site Investigation and detailed design completion, so that it is no deeper than 1.0 metre where feasible.</p>
Historic Environment Scotland (HES)	<p><u>Consultation response dated 3rd November 2023</u></p> <p>Objection lodged based on significant adverse impact on the integrity of the setting of Auchensaugh Hill Cairn. Key outward view from Auchensaugh Hill Cairn to Tinto Hill Cairn would be obstructed by T32. Recommendation therefore that turbine is either relocated or height of the turbine is reduced to allow for important reciprocal view between two monuments. HES also advised either the removal or relocation of T5, T6, T7, T9 and T10 due to their impacts on the important views towards Auchensaugh Hill Cairn from the south and southeast.</p>	<p>T9 and T10 have been removed.</p> <p>The tip height of T32 has been reduced from 250m to 210m to mitigate concerns relating to the key view from Auchensaugh Cairn towards Tinto Cairn which forms part of the setting of the monument.</p> <p>T5, T6 and T7 have been reduced in height to 210m.</p>
	<p><u>Post-application consultation dated 3rd May 2024 (see FEI Technical Appendix 8.1)</u></p> <p>HES welcomed the reduction in height of T5, T7 and T32 and removal of T9 and T10.</p> <p>HES confirmed the reduction in height of T32 was sufficient to reduce the level of impact on the key view from Auchensaugh Hill cairn towards Tinto Hill cairn. HES noted the removal of T9 and T10 and reduction in height of T5 and T7 which would reduce the impact on key views towards Auchensaugh Hill cairn.</p> <p>However, HES highlighted lack of revision to T6 which would still result in significant impact on key views towards Auchensaugh Hill cairn from the south and south east. HES strongly recommended reducing the height of T6 to 210m.</p>	<p>T6 has been reduced from 250m to 210m.</p> <p>Taken together the Applicant has now responded to each of the mitigation measures proposed by HES with respect to turbine removal and turbine tip height reduction in order to address the setting impacts on Auchensaugh Hill cairn.</p>
	<p><u>Post-application consultation dated 22 April 2025 (see FEI Technical Appendix 8.1)</u></p> <p>HES confirm that the measures proposed mean the Revised Proposed Development is not likely to have effects</p>	N/A



	that would raise issues of a national interest and as such HES is likely able to remove its objection.	
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CAPACITY AND GRID CONNECTION

- 1.13 The changes to the design result in a reduction in generating capacity from approximately 259MW to approximately 245MW, alongside approximately 100MW of BESS storage (as per the 2023 Proposed Development).
- 1.14 As such, the Revised Proposed Development remains on track to make significant and important contributions to national renewable energy generation and carbon reduction targets and crucially will help to deliver the legally binding Scottish Government target of net zero by 2045.

STRUCTURE OF THIS PLANNING STATEMENT ADDENDUM

- 1.15 The following structure has been adopted in this Planning Statement Addendum:

Chapter 1: Introduction (this chapter) provides an overview of the purpose of this Planning Statement Addendum, summarises design changes to the Proposed Development and sets out the structure and content of the Addendum.

Chapter 2: Policy Review provides an overview of key updates to national and local renewable energy, climate change and planning policy and strategies which have emerged following the submission of the 2023 EIA Report and the 2023 Planning Statement.

Chapter 3: Design Revisions and Planning Appraisal sets out an updated planning appraisal of the Revised Proposed Development, following the Design Changes. It focuses on the key issues of landscape and historic environment impacts, highlighting design response to consultation feedback. It also provides a high-level overview of other relevant effects, including ornithology, ecology, ground conditions (peat), traffic and noise.

Chapter 4: Conclusions sets out the balance of issues in respect of the planning case for the Revised Proposed Development, taking into account the proposed design mitigation measures implemented.



2. RENEWABLE ENERGY AND THE CLIMATE EMERGENCY – 2025 POLICY UPDATE

SUMMARY

This section provides an updated policy overview to relevant UK, Scottish and local level policies, including planning, climate and renewable energy policies and targets. It focuses on relevant updates to policy since the submission of the 2023 EIA Report and supporting 2023 Planning Statement.

It demonstrates the Revised Proposed Development will make a substantial contribution towards delivering the change required by the Climate Change (Emissions Reductions Targets) (Scotland) Act 2019, as a National Development under Annex B of NPF4. Overall, the Revised Proposed Development continues to draw high level support from national energy, climate, industrial and economic policy, which all support the need case for renewable energy development

This section should be read in conjunction with **Chapter 3: Renewable Energy and the Climate Emergency** of the 2023 Planning Statement.

NATIONAL CONTEXT

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

- 2.1 The 2023 Planning Statement summarises the provisions of the Climate Change (Emissions Reductions Targets) (Scotland) Act 2019, including the interim targets for emissions reductions on the route to 100% (net zero) by 2045.
- 2.2 In September 2024, the Climate Change (Emissions Reduction Targets) (Scotland) Bill was lodged in light of missed targets. The Bill was passed on 5th November 2024 and amends the Climate Change (Scotland) Act 2009 with the aim of providing a more reliable framework for emissions reduction. Scotland will now move to using five-year carbon budgets to set climate targets, based on recommendations from the independent Climate Change Committee. This approach aims to reflect that previous emissions targets are vulnerable to year-to-year fluctuations (such as colder winters or global events such as the pandemic).
- 2.3 In addition to dropping the annual targets, the Scottish Government abandoned its interim target of achieving a 75% reduction in GHG emissions by 2030, recognising that the target is 'out of reach'. The Scottish Government did however re-state its 'unwavering commitment' to reaching net zero by 2045, a target that remains embedded in statute.
- 2.4 In a statement to the Scottish Parliament on 19 June 2024, the Net Zero and Energy Cabinet Secretary confirmed that GHG emissions reduced by 50% over the period 1990 to 2022, against a target of 53.8% - therefore the 2022 target was missed. It is understood that the CCC will advise the Scottish Government on its carbon budgets in Spring 2025.
- 2.5 The June 2024 announcement to the Scottish Parliament about missing the 2022 target and the decision to abandon the 2030 interim target only serves to emphasise how much work still requires to be done to achieve the long-term goal of net zero GHG



emissions by 2045. More must be achieved in less time, with GHG emissions falling at an even sharper rate than envisaged when the 2045 net zero target (a legal requirement) was first set. The Revised Proposed Development, a National Development under Annex B of NPF4 (see below) can make a substantial contribution in this regard.

- 2.6 There is a heightened need for Scotland to progress with the development of renewable energy generation (including onshore wind) and supporting infrastructure (such as battery storage) to feed into these ambitious targets. There has been recognition by the Government that renewable energy technologies will play a key role in the delivery of the emission reduction targets, as set out below.

Scottish Government Programme for Government 2024 - 2025

- 2.7 The Scottish Government's Programme for Government is published annually, setting out the actions that the Government will take in the coming year ahead and beyond. The Programme for Government published in September 2024 four key priorities. Priority 3 is identified to be 'tackling the climate emergency'. The accompanying statement recognises Scotland's renewable energy generation as "*one of the country's greatest environmental and economic opportunities*".
- 2.8 Section 3 outlines: '*The twin crises of climate change and biodiversity loss represent the existential threat of our times, underlined by recent confirmation that the global temperature has pushed past the internationally agreed 1.5 degrees Celsius warming threshold for a 12-month period. We must reduce emissions and our vulnerability to the future impacts of climate change and restore our natural environment.*' This mirrors NPF4 (see below) which puts the twin global climate and nature crisis at the very heart of national planning policy and related decision making.
- 2.9 The statement sets out that, to support a just transition to a green economy, Scotland's Energy Strategy and Just Transition Plan will be published shortly. This will double the Government's ambitions for renewable energy, formalising the scale of development and pace required to meet the needs of Scotland's energy transition and achieve net zero targets (see 2023 Planning Statement Chapter 6: Other Material Considerations 'draft Scottish Energy Strategy and Just Transition Plan).
- 2.10 Other key actions of relevance to the Revised Proposed Development include the ambition to improve the consistency and pace of the consenting process for proposals over 50MW, ensuring demand can be met and reducing timescales for section 36 and 37 determinations, demonstrating the importance of developments like the Revised Proposed Development in achieving national government goals.

Green Industrial Strategy

- 2.11 The Scottish Government published their Green Industrial Strategy¹ in September 2024. It forms part of a broader national strategy for economic transformation and identifies key areas of opportunity for Scotland to grow globally competitive industries in the transition to net zero.
- 2.12 The Strategy includes five key areas for Scotland's economy to develop. Of key relevance to this Planning Statement Addendum, this includes:

¹ Scottish Government (2024) Green Industrial Strategy [Online] Available at: <https://www.gov.scot/publications/green-industrial-strategy/>



“Opportunity 1. Maximising Scotland’s wind economy: making the most of our natural resources and established onshore and offshore wind sectors...” which focuses on harnessing the success and ambition of Scotland’s wind industry, for Scotland to be internationally recognised and play its part on a global stage. Based on the role onshore wind plays in the country’s energy mix, the Strategy states that *“a thriving onshore wind sector is therefore critical to the decarbonisation in Scotland and the UK”*.

- 2.13 Other aims of the Green Industrial Strategy are focused on the wider industrial economy of Scotland, with *“Opportunity 5: Building Clean Industries”* which aims to establish Scotland as a competitive centre for the clean Energy Intensive Industries, supporting electrification of existing energy intensive industries and attracting international investment for new industries. The success of this opportunity is reliant on the successful deployment of a growing capacity in renewable electricity generation.
- 2.14 The Green Industrial Strategy highlights the importance of renewable energy production to Scotland’s industrial prospects and economic ambitions, as defined by the Scottish Government.

Onshore Wind Sector Deal

- 2.15 In September 2023, the Scottish Government introduced the onshore wind sector deal. The deal sets out how the onshore wind industry and the Scottish Government will work together to deliver onshore wind quickly and sustainably, while benefiting local communities, helping reach the onshore wind target of 20GW by 2030. The sector deal is therefore more than just an agreement. It demonstrates the government’s firm commitment to the urgent delivery of onshore wind while maximising the range of benefits it provides including its role in driving economic growth, creating high quality jobs, reducing carbon emissions and benefiting communities across Scotland.

UK Government Clean Power 2030 Action Plan

- 2.16 At UK level, the Department for Energy Security and Net Zero published the Clean Power 2030 Action Plan in December 2024, setting out a national pathway to a clean power system by 2030. The policy paper sets out the Labour Government’s commitment to delivering ambitious reforms to the national energy system, restating the importance of protecting energy consumers and securing energy security for the UK. It defines a ‘Clean Power Target’ for Great Britain to be *“generating enough clean power to meet our total annual electricity demand, backed up by unabated gas supply to be used only when essential”*. This means that clean sources produce at least as much power as the country consumes in total and produce at least 95% of GB’s energy generation.
- 2.17 The Action Plan states that the pathway to Net Zero includes ambitious targets for renewable energy infrastructure. The report notes on page 7 in the Executive Summary that *‘there is no path to clean power without mass deployment of offshore wind, together with onshore wind and solar’*. Onshore wind and solar are recognised as ‘the cheapest clean power options available’ (page 27), which can deploy at a faster rate than offshore wind. Of relevance to the Revised Proposed Development, the pathways in Clean Power 2030 set a doubling of UK onshore wind capacity from 14GW in 2023 to 27-29 gigawatts (GW), complemented by 23 – 27 GW of battery storage.
- 2.18 To meet these ambitious and hold our pathway to 2030, the UK Government recognises that considerable action is required to accelerate delivery and a key part of this will be working in partnership with the Scottish Government.



SUMMARY

- 2.19 The Revised Proposed Development is afforded considerable support from national level policy and strategy, at both Scottish and UK level. The countries have legally binding commitments to be net zero by 2045 and 2050 respectively and have recognised that there is considerable progress to be made to achieve these ends.
- 2.20 The Revised Proposed Development will have a generating capacity of approximately 245MW, making a significant contribution to Scotland's ambitious renewable energy and legally binding emissions targets.
- 2.21 The Revised Proposed Development will also make an important contribution to the wider policy goals of the Scottish Government, which recognises the importance of onshore wind to the economy of Scotland, and the important role it can play in delivering economic benefits and opportunities to the people of Scotland. The 2023 Planning Statement (see Chapter 3: The Proposed Development section 'Key Project Benefits') provides a detailed overview of the socio-economic benefits associated with the Proposed Development. This includes the commitment to the creation of a Community Benefit Fund that will serve local communities within 10 km of the Revised Proposed Development which remains unchanged from the 2023 Proposed Development. The FEI includes 'Bodinglee Wind Farm: Maximising Socio-economic Benefits'², an assessment which outlines the net socio-economic benefits the Revised Proposed Development will deliver, relating to supply chains, skills development, community empowerment, environmental protection and enhancement, and Gross Value Added (GVA) to both the local and national economy.
- 2.22 Overall, the Revised Proposed Development continues to draw high level support from national energy, climate, industrial and economic policy, which all support the need case for renewable energy development.

² BiGGAR Economics (2025) Bodinglee Wind Farm: Maximising Socio-economic Benefits (FEI Planning Statement - Appendix A)



3. PLANNING POLICY APPRAISAL

SUMMARY

This section provides an updated policy overview to relevant UK, Scottish and local level policies, including planning, climate and renewable energy policies and targets. It focuses on relevant updates to policy since the submission of the 2023 EIA Report and supporting 2023 Planning Statement.

It demonstrates the Revised Proposed Development will make a substantial contribution towards delivering the change required by the Climate Change (Emissions Reductions Targets) (Scotland) Act 2019, as a National Development under Annex B of NPF4. Overall, the Revised Proposed Development continues to draw high level support from national energy, climate, industrial and economic policy, which all support the need case for renewable energy development

This section should be read in conjunction with **Chapter 3: Renewable Energy and the Climate Emergency** of the 2023 Planning

RELATIONSHIP WITH 2023 PLANNING STATEMENT

- 3.1 The 2023 Planning Statement provides the policy context and planning appraisal for the 2023 Proposed Development. Therefore, this section should be read in conjunction with **Chapter 5: National Planning Policy** and **Chapter 6: Local Planning Considerations** of the 2023 Planning Statement.
- 3.2 The 2023 Planning Statement also provides a detailed account of the key benefits of the Proposed Development, including contributions to climate change (carbon emissions reductions) and renewable energy targets, socio-economic benefits, significant biodiversity and habitat enhancements, and improvements to local access and recreation opportunities within the site and surrounding landscape. This context remains important to the assessment of the Revised Proposed Development and should be read in conjunction. An updated assessment of socio-economic benefits associated with the Revised Proposed Development is provided within the FEI Planning Statement – Appendix A - 'Bodinglee Wind Farm Maximising Socio-economic Benefits' report.

UPDATED PLANNING POLICY APPRAISAL

- 3.3 As set out in the 2023 Planning Statement, National Planning Framework 4 (NPF4), the South Lanarkshire Local Development Plan 2 (SLLDP2) and associated planning guidance make up the statutory Development Plan which comprise material considerations in the determination of the application for the Revised Proposed Development. There is no 'primacy' of the Development Plan in an application made under the Electricity Act, as would be the case for an application under the Planning Act³. Rather, weight can be attributed by the decision maker to all material

³ As found in the case of William Grant & Sons Distillers Ltd v Scottish Ministers [2012] Court of Session Outer House 98 (paragraphs 17 and 18).



considerations including the various levels of national and local energy and planning-related policy and guidance as deemed appropriate⁴.

- 3.4 The Scottish Government's Chief Planner issued a letter on 8 February 2023 relating to 'Transitional Arrangements for National Planning Framework 4' to provide advice on NPF4 becoming part of the statutory Development Plan. The letter reiterates that, as per Section 13(2)(3) of the Planning (Scotland) Act 2019, in the event of any incompatibility (which is not defined) between a NPF4 provision and a LDP provision, whichever of them is later in date shall prevail. In the case of the Revised Proposed Development therefore, in the event of any policy incompatibility, NPF4 policy prevails. In a letter dated 27 June 2024, the Chief Planner reinforced the position of the Scottish Ministers that 'policies in NPF4 should be read and applied as a whole and that conflicts between policies are normal and to be expected'.
- 3.5 NPF4 Policy 11: Energy and SLLDP2 Volume 1 Policy 18: Renewable Energy remain the central policies of relevance to the Revised Proposed Development. While the Development Plan is designed to be read as a whole, these policies are central for this application. They require that renewable energy developments are assessed against a set of environmental considerations. The environmental effects of the Revised Proposed Development have been assessed in full, both within the 2023 EIAR and the supporting 2025 FEI Report.
- 3.6 Given the design of the Revised Proposed Development responds mainly to feedback concerning landscape and visual impacts and historic environment impacts, the following sections appraise the Revised Proposed Development incorporating the Design Changes, against the relevant policies of the Development Plan.
- 3.7 The following sections focus on the layout of the Revised Proposed Development, in response to consultation feedback, and draw on the conclusions of the 2025 FEI Report.

RENEWABLE ENERGY CONTRIBUTIONS AND CARBON SAVINGS

- 3.8 It is important to reiterate that the Revised Proposed Development is afforded clear high-level support by NPF4 as a whole. In particular, Policy 1 (tackling the climate and nature crises), which establishes that significant weight will be afforded to the global climate crisis when considering all development proposals, and Policy 11 (energy) which gives high level support for renewable energy development. It is clear that the adoption of NPF4 is having a material effect upon the weight that decision makers give to the global climate emergency and nature crisis. This is perhaps best evidenced by two recent S36 wind farm cases at Clashindarroch II and Shepherds Rig, where following the introduction of NPF4, the Reporters changed their initial recommendations to refuse permission to recommendations to approve the applications. At Clashindarroch II, in the post NPF4 Supplementary Report to Ministers (DPEA Reference WIN-110-2, 3 March 2023), the Reporter concluded in paragraph 2.90 that:-

⁴ These principles were reaffirmed by the Court of Session Outer House in the case of Wildcat Haven Community Interest Company v Scottish Ministers [2024] CSOH 10 (paragraph 43) dated 8 February 2024 and by the subsequent Inner House judgment dated 15 November 2024 ([2024] CSOH 10). principles were reaffirmed by the Court of Session Outer House in the case of Wildcat Haven Community Interest Company v Scottish Ministers [2024] CSOH 10.



'I find the weight that should be given to the contribution these proposals make towards renewable energy generation and greenhouse gas emission targets is now greater and necessitates a change to my previous assessment of acceptable landscape and visual effects'

- 3.9 An updated Carbon Balance Study has been produced (see FEI Technical Appendix 2.7 of the 2025 FEI Report) to re-assess the carbon emissions savings associated with the Revised Proposed Development. The proposed Design Changes have reduced the carbon losses associated with the Revised Proposed Development due to reduced impacts on peat. However, it is anticipated that the carbon loss will be paid back in approximately 1.3 years (3% of the design life), in line with the 2023 Proposed Development. The Revised Proposed Development is expected to provide a total carbon saving of over 352,320 tonnes per year and 14,092,800 tonnes over the lifetime of the Proposed Development against the Fossil-Fuel mix. It will therefore deliver a highly beneficial contribution to the Scottish Government's carbon emissions reductions targets.
- 3.10 The Revised Proposed Development will deliver approximately 245MW of renewable energy, alongside 100MW of battery storage capacity. Therefore, the Revised Proposed Development will make significant contributions to national renewable energy generation ambitions. Crucially, it is planned that the Revised Proposed Development will be operational to help deliver the legally binding Scottish Government target of net zero by 2045 and will continue to make a significant contribution to decarbonisation objectives beyond this date. As per NPF4 Policy 1 and Policy 11, the scale of these contributions should therefore continue to be afforded significant weight when considering the Revised Proposed Development.

SOCIO-ECONOMIC BENEFITS

- 3.11 As set out in detail in the 2023 Planning Statement, the Applicant is highly committed to maximising investment in the local economy and delivering a multitude of benefits for local communities. With regards to socio-economic benefits, the 'Bodinglee Wind Farm Maximising Socio-economic Benefits' report has been submitted as part of this FEI, providing an updated assessment of the socio-economic benefits provided by the Revised Proposed Development, including supply chain commitments, skills development, community empowerment, environmental protection and enhancement, and Gross Value Added (GVA). In total, over the development, construction and operation phases of the Revised Proposed Development, it is estimated that it will contribute approximately:
- £218 million GVA in South Lanarkshire;
 - £522 million GVA in Scotland; and
 - £808 million GVA in the UK.
- 3.12 As evidenced within the 'Maximising Socio-economic Benefits' Report, the Revised Proposed Development fully complies with NPF4 Policy 11(c).
- 3.13 As per the 2023 Proposed Development, the Revised Proposed Development continues to offer a wide range of social benefits including Community Benefit Funding, capacity building and shared ownership, drawing support from NPF4 Policy 25 (Community Wealth Building). Further details of socio-economic impacts of the



Revised Proposed Development are provided within the FEI 'Maximising Socio-economic Benefits' Report.

LANDSCAPE AND VISUAL IMPACTS

- 3.14 Chapter 4 (section 'Landscape and Visual') of the 2023 Planning Statement sets out how the 2023 Proposed Development aligns with NPF4 Policy 11 (Energy) and Policy 4 (Natural Places) outlines the acceptability of the 2023 Proposed Development, with particular regard to SLLDP2 Volume 1 Policy 18: Renewable Energy and 14: Natural and Historic Environment, Volume 2 Policy RE1: Renewable Energy Assessment Checklist, along with supporting planning guidance.
- 3.15 Chapter 4 of the 2025 FEI Report focuses on the updated assessment of landscape and visual impacts as a result of the Design Changes which form part of the Revised Proposed Development.
- 3.16 As previously identified, and acknowledged in national policy, significant landscape and visual effects are expected for this type of renewable energy development. However, the Design Changes incorporated in the Revised Proposed Development will (in addition to the previous design iterations set out in the 2023 EIA Report) further reduce the localised residual adverse impacts on landscape and visual receptors. As such, appropriate design mitigation has been applied, while maintaining the important contributions the Revised Proposed Development will make to renewable energy and carbon emissions reduction targets, in line with NPF4 Policy 11(e)(ii). The Revised Proposed Development will deliver significant benefits which, it is considered, outweigh the residual adverse landscape and visual effects.

Post 2023-submission consultation feedback and design response

- 3.17 NatureScot did not raise an objection to the 2023 Proposed Development on landscape and visual grounds. It did provide an advisory note (dated 17th October 2023) in relation to some effects on some landscape and visual receptors, with focus on the impacts on Tinto and Dungavel Hills, and the landscape and visual effects experienced by these receptors. NatureScot also considered that the 2023 Proposed Development would have significant effects on the integrity of the Upper Clyde Valley and Tinto Special Landscape Area (SLA).
- 3.18 These comments informed the Design Changes to the Revised Proposed Development. As discussed below (see 'Historic Environment' section), design changes were also made to the 2023 Proposed Development in response to consultation feedback from Historic Environment Scotland (HES) and have been re-assessed in landscape and visual terms within the 2025 FEI Report. Key modifications to the design included the removal of two turbines (T9 and T10) in Bodinglee West and a reduction in the maximum tip height of turbines T5, T6 and T7 in Bodinglee West and T13, T14, T15, T18, T22 and T32 in Bodinglee East from 230m or 250m to 210m. This reduces the prominence of these turbines in certain views, including views from the Upper Clyde Valley and Tinto SLA.
- 3.19 In the case of landscape and visual effects on Douglas Valley SLA, the effect is not considered to be significant. This is due in part to the existing influence of wind farms within and adjacent to the SLA, both to the north-west (Hagshaw cluster) and south (Andershaw and Middle Muir cluster). Although the Revised Proposed Development would be noticeable, it would be associated with the open moorland hills which enclose the Douglas Valley, reflecting current landscape patterns.



- 3.20 Whilst the Revised Proposed Development would result in direct and indirect changes to the landscape character of the SLA, and views from the SLA, the extent of direct changes would be localised and would have no significant effect on any of the landscape features which are referenced in the special qualities. Landscape enhancement measures would help to offset direct effects. The Revised Proposed Development would influence the setting of the valley. The experience of the valley (which has been altered by existing wind farms) would remain similar. There would be no significant effects on the special qualities of the SLA, and no significant adverse effects on the overall integrity of the Douglas Valley SLA. This is the same as reported in Chapter 4 of the 2023 EIA Report.
- 3.21 With regards to the landscape and visual events on Tinto Hill and Dungavel Hills, the Design Changes would remove the theoretical visibility of two hubs and two blades, with tip height reductions in Bodinglee East reducing the prominence of Turbines 13, 14, 15, 18, 22 and 32 for both viewpoints. The residual effects remain significant, as reported in the 2023 EIA, but have reduced in prominence.
- 3.22 Although significant landscape and visual effects would be experienced within the Upper Clyde Valley and Tinto SLA, this would not result in a significant effect on its integrity, or on any of the special qualities for which it has been identified. As identified by the 2025 FEI Report, and as reported in the 2023 EIAR, there would be no direct effects on the SLA. Significant visual effects are identified in certain views from the western part of the SLA, affecting panoramic views from popular summits such as Tinto Hill and Dungavel Hill. However, due to the existing influence of wind farm development on these views, this is not judged to translate into significant effects on the special qualities of the SLA. Views of the Revised Proposed Development from the valleys through the SLA would generally be longer distance and fleeting in nature and would not significantly affect the *"symbiotic relationship between the landscape of the valley and the hills which provide its setting"*. This is the same as reported in Chapter 4 of the 2023 EIA Report. However, the Design Changes would slightly reduce the prominence of turbines from certain viewpoints, which serves to partially mitigate the landscape and visual effects relative to those identified in the 2023 Report, including with respect to views from the Upper Clyde Valley and Tinto SLA.
- 3.23 Taken together, it is clear that the Revised Proposed Development can be supported pursuant to Policy 4(d)(i) of NPF4: that Development will not have significant adverse effects on the integrity of the area or the qualities for which it has been identified. In any case, it is considered that the benefits of the Proposed Development are considered to outweigh any adverse effects upon the SLAs and that these benefits are demonstrably of at least local importance, complying with Policy 4(d)(ii) of NPF4. The fact that the Proposed Development falls into the category of National Development 3 'Strategic Renewable Electricity Generation and Transmission Infrastructure' in NPF4 supports this position. In assessing that proposal against this part of Policy 4(b), the Reporters in the Glendye Wind Farm S36 application (ECU ref: ECU00000676) noted in paragraph 10.7 of their report (dated 2nd May 2023) that:-

'We are of the view that this national development status logically offers benefits of more than local importance'

Cumulative landscape and visual effects

- 3.24 In line with NPF4 Policy 11(e)(xiii), the 2025 FEI Report provides an updated assessment of cumulative effects, considering changes to the cumulative baseline since the 2023 EIAR. Since submission of the 2023 Proposed Development, the



Scenario 2 cumulative baseline (i.e. Revised Proposed Development and all operational, under construction, consented and undetermined valid planning applications, and schemes at scoping) has been updated to remove Glentaggart Wind Farm (which has not progressed to application since scoping in 2023) and include the M74 West Renewable Energy Park, which was submitted to the ECU in September 2024. Cumulative landscape and visual effects have been considered in full within Chapter 4 of the 2025 FEI Report.

- 3.25 The proposed Design Changes are not expected have a perceptible impact on the cumulative relationship with other wind farms, when compared to the 2023 Proposed Development. However, there would be some change to the significance of cumulative landscape and visual effects for some viewpoints, due to the changes in the cumulative baseline (most notably the removal of Glentaggart and introduction of the neighbouring M74 scheme) with significant cumulative effects identified for the 'host' LCT and three neighbouring LCTs, significant cumulative effects at some visual receptors and a small number of viewpoints.
- 3.26 However, within the context of the Scenario 1 cumulative baseline (i.e. the Revised Proposed Development and operational, under construction and consented wind farms), which has been updated to take account of the status of Lethans Extension and Glenmuckloch, the cumulative effects for the Revised Proposed Development (under Scenario 1) remain as reported for the 2023 Proposed Development.

Assessment of acceptability

- 3.27 As set out in the 2025 FEI Report, there is no change to the significance of landscape and visual effects identified in the 2023 EIAR. However, the proposed Design Changes will reduce the prominence of turbines from certain viewpoints, serving to partially mitigate the residual landscape and visual effects relative to those identified for the 2023 Proposed Development.
- 3.28 NPF4 Policy 11: Energy (e)(ii) sets out that project design and mitigation should demonstrate how the following impacts are addressed: *"(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"*.
- 3.29 As set out in the 2023 Proposed Development LVIA, significant landscape effects are identified for localised areas of neighbouring LCTs, up to an extent of approximately 6km from the nearest turbines, and significant visual effects are limited to receptors within approximately 11km. As has been evidenced by the quantitative distances accepted as localised effects in recent Section 36 wind farm determinations⁵, these residual significant landscape and visual effects, which for the Revised Proposed Development extend to only 11km at some viewpoints, can therefore be considered localised in line with the policy requirements of Policy 11(e)(ii). As noted above, significant landscape and visual impacts of this nature are to be expected for onshore wind development proposals.
- 3.30 However, the design iterations which resulted in the 2023 Proposed Development (which included the removal of 25 turbines from the Scoping Layout), as well as the post-submission design response to consultation feedback (as described and

⁵ For example, Bunloinn Wind Farm (ECU ref: ECU00003304) (March 2024) with significant landscape and visual effects up to 14.7km and Chleainsaid Wind Farm (ref: ECU00002031) (December 2023) up to 12km



assessed within the FEI Report and this Planning Statement Addendum), clearly evidence that the Revised Proposed Development has demonstrated proactive, effective and appropriate mitigation by design. The thorough design iteration process has taken account of all environmental constraints, including reducing landscape and visual impacts as far as practicable, whilst retaining the key benefits of the Revised Proposed Development (in particular, maximising the renewable energy generation potential of the Site and making contributions to renewable energy generation targets, with the Revised Proposed Development making up 1.2% of the Scottish Government's 20GW target for onshore wind by 2030). In particular, the Applicant has demonstrated a meaningful design response to feedback from consultees.

- 3.31 Overall, in line with Policy 11(e)(ii), it is considered not only that landscape and visual effects have been localised as far as possible, but also that appropriate design mitigation has been applied.
- 3.32 The benefits of the Revised Proposed Development - including contributions to renewable energy and carbon emissions reduction targets, as well as wider social, economic and environmental benefits (as detailed in the 2023 Planning Statement) - continue to outweigh the localised significant residual landscape and visual effects identified for the Revised Proposed Development. The Revised Proposed Development is considered acceptable with regard to NPF4 Policy 4 and Policy 11. Furthermore, it complies with the relevant policies of SLLDP2 (i.e. Volume 1 Policy 18: Renewable Energy and 14: Natural and Historic Environment, Volume 2 Policy RE1: Renewable Energy Assessment Checklist and supporting planning guidance).

HISTORIC ENVIRONMENT

- 3.33 Chapter 5 (section 'Cultural Heritage and Archaeology') of the 2023 Planning Statement sets out how the 2023 Proposed Development aligns with NPF4 Policy 11 (Energy) and Policy 7 (Historic assets and places). Chapter 6 of the 2023 Planning Statement outlines the acceptability of the 2023 Proposed Development, with particular regard to SLLDP2 Volume 1 Policy 18: Renewable Energy and 14: Natural and Historic Environment, Volume 2 Policy RE1: Renewable Energy Assessment Checklist, along with supporting planning guidance.
- 3.34 Chapter 8 of the 2025 FEI Report sets out the assessment of environmental effects of the Revised Proposed Development with regards to the historic environment. The design changes of key relevance to this discussion are the removal of two turbines (T9 and T10) and the lowering in tip height of four turbines (T5, T6, T7 and T32).

Post-submission consultation feedback

- 3.35 HES initially objected to the 2023 Proposed Development due to the potential for a significant adverse impact on the integrity of the setting of the scheduled monument known as Auchensaugh Hill, cairn (SM4234) (correspondence dated 3rd November 2023). Following this, initial design revisions were presented to HES, including removal of Turbines 9 and 10 from the scheme, and reduction in height of Turbines 5, 7 and 32 to 210m blade tip height. Regarding these proposed design revisions, the HES consultation response (dated 3rd May 2024) confirmed that:
 - The proposed revisions would mitigate, to a degree, the potential significant adverse impacts on the setting of Auchensaugh Hill cairn (SM4234), as raised in their previous response to the application (dated 3rd November 2023).



- The reduction in height of Turbine 32 from 250m to 210m has reduced the level of impact on the key view from Auchensaugh Hill cairn towards Tinto Cairn (SM4660). HES confirmed they are satisfied that these proposed revisions would be sufficient to mitigate their concerns relating to this key view within the setting of the monuments.
 - The removal of Turbines 9 and 10 and the reduction in height of Turbines 5 and 7 would help to reduce impact on the key views towards Auchensaugh Hill cairn from the east and the south to a degree.
 - HES recommended that Turbine 6 would remain a significant adverse impact on the setting of the cairn and recommended mitigation should be undertaken to reduce this impact.
- 3.36 In summary, HES (in their 3rd November 2023 correspondence) confirmed that they are satisfied that the proposed Design Changes would help to reduce the impacts on the setting of Auchensaugh Hill cairn (S4234). However, further mitigation was recommended regarding Turbine 6.
- 3.37 Following the November 2023 consultation feedback, Turbine 6 was reduced from 250m to 210m tip height. Further correspondence from HES (dated 22 April 2025 - see 2025 FEI TA 8.1), confirms that HES are now in a position to withdraw their objection to the Revised Proposed Development, as they conclude that it would no longer raise issues of national interest.
- 3.38 The 2025 FEI Report identifies that the removal and reduction in height of turbines has reduced the level of impact that will occur, by preserving the openness of the Auchensaugh hilltop and reducing the dominance of turbines in views that contribute to how the siting of the asset and its relationships with other heritage assets are understood and appreciated. The reduction is greatest in views of the cairn from the south and south-east. The removal of turbines also decreases the sense of encroachment of the Revised Proposed Development, leaving open the landscape to the north-west of the cairn.
- 3.39 In addition, the reduction in height of T32 reduces the impact of the Revised Proposed Development upon the experience, understanding and appreciation of the relationship between Auchensaugh Hill cairn and Tinto Cairn (SM4660), ensuring an unobstructed view from the monument towards Tinto Hill. While the Revised Proposed Development will still result in changes to the way that the setting of Auchensaugh Hill cairn contributes to its cultural significance, the proposed Design Changes will reduce the level of impact that will occur.

Cumulative Cultural Heritage assessment

- 3.40 Following the 2023 Planning Statement and in compliance with NPF4 Policy 11(e)(xiii), the cumulative cultural heritage impacts of the Revised Proposed Development have been considered in full in the 2025 FEI Report. The cumulative baseline has been updated to include the M74 West Renewable Energy Park, which was submitted to the ECU in September 2024.
- 3.41 The cumulative assessment identifies that the intensification of turbines with the introduction of the M74 scheme, would result in more severe effects (moderate, significant) on three cultural heritage receptors (i.e. Auchensaugh Hill Cairn, Thirstone Stone Circle and Netherton Cairn).



- 3.42 The measures introduced by the Revised Proposed Development, through the iterative design process and embedded design mitigation, have reduced effects on the historic environment as far as possible by fully addressing the concerns raised by HES. As such, the Applicant has undertaken reasonable and proportionate design changes to mitigate adverse effects on the historic environment, including when considered cumulatively with other schemes.

Assessment of acceptability

- 3.43 As per the 2023 Proposed Development, in EIA terms, the Revised Proposed Development will result in moderate and therefore significant indirect effects on the setting of three scheduled monuments. In response to HES feedback, the proposed Design Changes have primarily been undertaken to reduce the magnitude of change to Auchensaugh Hill cairn (SM4234). The removal of two turbines and reduction in height of four turbines has resulted in a residual effect that is meaningfully lower than those identified in the 2023 EIA Report. While the magnitude of setting change (i.e. the way that the setting of Auchensaugh Hill cairn (SM4234) contributes to its cultural significance, and how it is appreciated and experienced) remains significant in EIA terms, it is much reduced. Based on the reduction in the magnitude of change, HES has confirmed (see FEI TA 8.1, correspondence dated 22nd April 2025) that they no longer consider the Revised Proposed Development to raise issues of national interest.
- 3.44 Following the conclusions of the 2023 Planning Statement, the Revised Proposed Development has avoided direct adverse effects on designated assets, and impacts on their settings have been minimised as far as practicable, through the iterative design process and embedded mitigation, while maintaining the balance with the delivery of the significant benefits the Revised Proposed Development. This is evidenced with the considerable Design Changes which have been developed post-submission.
- 3.45 The Applicant has proposed considerable Design Changes in response to HES feedback, ensuring that adverse impacts on historic environment receptors have been reduced since the 2023 Proposed Development. Since the 2023 submission, the Applicant has now responded to each of the mitigation measures proposed by HES with respect to turbine removal and tip height reduction in order to address the setting impacts on Auchensaugh Hill cairn. As such, all HES's comments have been meaningfully addressed by the proposed Design Changes, demonstrating clear effort and positive outcomes with respect to minimising effects on heritage assets and support their protection.
- 3.46 The Applicant continues to be engaged with the important cultural and social heritage of the local area. The 2023 Planning Statement details and signposts specific proposals where the 2023 Proposed Development contributes to supporting cultural heritage, community and place enhancements in the local area⁶. These benefits remain applicable through the package of enhancement and compensatory measures which are proposed for the Revised Proposed Development.
- 3.47 Overall, the Revised Proposed Development complies with NPF4 Policy 7 and Policy 11, by avoiding and minimising effects on heritage assets and supporting their protection and enhancement. With respect to the residual effect on the setting of

⁶ Relevant cultural heritage enhancements include improvements to Maidengill farmhouse, Castle Douglas landscape and access proposals, and provision of interpretation, paths and access to cultural heritage assets, including re-instating the historic link between Douglas Valley and Roberton. Community benefit funding for heat performance will help support historic buildings.



Auchensaugh Hill cairn effect this is not considered to have an adverse impact upon the integrity of the setting of this Scheduled Monument. Taken together with the recent correspondence from HES in response to the Design Changes, the Applicant is satisfied that the Revised Proposed Development can be supported pursuant to Policy 7(h) of NPF4. The Revised Proposed Development also complies with the relevant key policies of SLLDP2 (i.e. Policy 18: Renewable Energy and 14: Natural and Historic Environment, Volume 2 Policy RE1: Renewable Energy Assessment Checklist, along with supporting planning guidance). other design amendments and relevant policy appraisal

Ground conditions including peat

- 3.48 The 2023 Planning Statement provides a detailed appraisal of NPF4 Policy 5: Soils, demonstrating policy compliance of the 2023 Proposed Development with this policy by minimising adverse effects on peat-rich soils through embedded design mitigation, while maximising the site for renewable energy generation, and delivering considerable peatland enhancement as part of the outline Peat Management Plan (oPMP) (see Technical Appendix (TA) 10.4 of the 2025 FEI Report) and outline Habitat Management Plan (oHMP) (see TA 6.4 of the 2025 FEI Report). The Revised Proposed Development has addressed the post-submission comments raised by SEPA and demonstrated alignment with the mitigation hierarchy, in line with NPF4 Policy 5(a).
- 3.49 A key design objective for the Revised Proposed Development was to ensure that turbines were not located in areas with a peat depth of 1 metre or greater. This was achieved through the removal of T9, and by the commitment to microsite T1. The proposed Design Changes that form part of the Revised Proposed Development, in particular the removal of Turbine 9, has reduced the total peat excavation for the Site by 9%. It is also anticipated that all peat and peaty soils excavated during construction will be reinstated on Site.
- 3.50 The Revised Proposed Development also incorporates amendments to track layout, to minimise impacts on peatland. For example, the track between T31 and T35 has been removed in order to avoid areas of peatland communities. Construction mitigation will allow for the micro-siting of infrastructure up to 50m to avoid pockets of deep peat.
- 3.51 Following consultation feedback from NatureScot and SEPA regarding the oHMP, a revised oHMP has been submitted with the application (2025 FEI Report TA6.4) reflecting requested updates in methodology.
- 3.52 As identified in the 2023 EIA Report, effects on carbon rich soils and peatlands from the 2023 Proposed Development were expected to be negligible, with enhancements to peat habitats being delivered as part of nature restoration and habitat enhancement measures. The additional design mitigation included will further mitigate impacts and reinforce planning policy compliance. Peatland losses associated with the Revised Proposed Development have been minimised where practicable and impacts decreased through the removal of turbines and redesign of the access track network. A large area of on-site and off-site moorland has been included in the oHMP, with the overall oHMP providing a compensation ratio of 1:14 (40% greater than NatureScot's recommended 1:10 target ratio⁷) on peatland habitat restoration. Further detail of compensation is provided in the oHMP (see TA 6.4 of the 2025 FEI Report).

⁷ NatureScot (2023) Advising on peatland, carbon-rich soils and priority peatland habitats in development management. Guidance note dated June 2023, available online at: <https://www.nature.scot/doc/advising-peatland-carbon-rich-soils-and-priority-peatlandhabitats-development-management> accessed March 2025.



- 3.53 The Revised Proposed Development has been designed in compliance with the mitigation hierarchy, in line with NPF4 Policy 5(a). In particular, the Design Changes include the removal of T9 and realignment of supporting infrastructure to avoid impacts on peat as far as possible, fully addressing SEPA's concerns. Policy 5(c)(ii) states that *"development proposals on peatland, carbon-rich soils and priority habitat will only be supported for: (ii) the generation of energy from renewable sources that optimises the contribution of the area to greenhouse gas emissions targets"*. As set out under 'Renewable Energy Contributions and Carbon Savings' appraisal above, the Revised Proposed Development demonstrates that this is the case, and it therefore complies with NPF4 Policy 5.

Ecology, ornithology and nature restoration

- 3.54 An updated assessment of the Revised Proposed Development with regards to ornithology and ecology are provided in Chapter 5 and Chapter 6 of the 2025 FEI Report, respectively. The 2023 Planning Statement sets out the acceptability of the Proposed Development with regards to the relevant policies, including an assessment of the significant biodiversity enhancements it will deliver.
- 3.55 As per the 2023 Proposed Development, no significant residual effects are expected with regard to ornithological and ecological impacts for the Revised Proposed Development. The proposed Design Changes have been developed in response to consultee feedback, with particular regard to peatland habitats (see previous section: 'Ground conditions including peat') and ornithological impacts.
- 3.56 Full details of NatureScot's and RSPB's consultation responses with regard to the Collision Risk Modelling (CRM) approach and methodology are provided in Chapter 5 of the 2025 FEI Report. In response to consultee feedback from NatureScot and RSPB, the CRM for the Revised Proposed Development has been re-assessed in full (see 2025 FEI Report TA 5.1). To address consultation responses from RSPB, the Bird Protection Plan (BPP) for the Revised Proposed Development introduces some additional targeted measures to reduce potential construction-related disturbance to particular species. Overall, as per the 2023 Proposed Development, all potential ornithological effects of the Revised Proposed Development remain as low to negligible magnitude, and the design changes, by reducing the number and height of turbines and length of access tracks, have reduced the level of impact within this range.
- 3.57 To align with the Design Changes of the Revised Proposed Development, an updated oHMP has been developed. Embedded mitigation measures ensure that there are no residual significant effects on ecological receptors. Furthermore, if the oHMP is delivered in full, the Revised Proposed Development will result in positive residual effects for low altitude blanket bog, montane blanket bog, Juncus meadows, northern wet heaths, oak/birch woodlands, reptiles and fisheries.
- 3.58 The Applicant's proposed Design Changes have sought to fully address the feedback of consultees and further minimise impacts on ornithological and ecological receptors. As per the 2023 Proposed Development, the revised oHMP will provide significant biodiversity enhancements in line with NPF4 Policy 3 and will contribute to tackling the nature crisis by offering net-positive contributions to national objectives for biodiversity enhancement, which is afforded significant weight by NPF4 Policy 1. Overall, the Revised Proposed Development continues to demonstrate policy compliance with regards to impacts biodiversity, including ornithological and ecological impacts.

Traffic and transport



- 3.59 The 2023 Planning Statement sets out the policy compliance of the 2023 Proposed Development with regards to traffic and transport impacts. Chapter 9 of the 2025 FEI Report provides an updated assessment regarding the Revised Proposed Development; this concludes that the Revised Proposed Development will attract fewer construction traffic movements.
- 3.60 As per the 2023 EIA, residual effects during the construction are expected to be minor and therefore not significant, as well as transitory in nature. There are no significant residual effects associated with operational or decommissioning phases. As such, the revised Proposed Development continues to demonstrate policy compliance with regards to traffic and transport impacts.

Noise

- 3.61 The 2023 Planning Statement sets out the policy compliance of the 2023 Proposed Development with regards to noise. Chapter 7 of the 2025 FEI Report provides an updated assessment for the Revised Proposed Development; this concludes that operational noise levels are reduced compared to predicted levels from the 2023 Proposed Development. Operational noise levels, in combination with cumulative wind farms remain compliant with applicable ETSU-R_97 noise limits. Further detail is provided within Chapter 7 of the 2025 FEI Report.
- 3.62 As per the 2023 EIA, effects associated with construction activities and traffic remain negligible to minor and temporary, and therefore not significant. Decommissioning is likely to result in less noise than during construction and are not expected to be significant. As such, the revised Proposed Development continues to demonstrate policy compliance with regards to noise impacts.

POLICY APPRAISAL SUMMARY

- 3.63 Since submission to the ECU in 2023, further iterations of design have taken place, leading to the layout of the Revised Proposed Development. The Applicant has demonstrated clear intent to minimise all environmental effects as far as practicable, while retaining the important and urgently needed benefits that the Revised Proposed Development will deliver in terms of renewable energy generation capacity.
- 3.64 Taking into account the 2025 FEI Report findings, the commentary above is limited to focus on the proposed Design Changes of the Revised Proposed Development and the updated environmental assessment. Significant adverse residual effects determined in the 2025 FEI Report remain limited to historic environment and landscape and visual only, as per the 2023 Proposed Development.
- 3.65 However, the level of the residual significant adverse effects has been reduced, with appropriate design mitigation applied in response to consultee feedback. The Revised Proposed Development has reduced the level of residual significant effects, in comparison with the 2023 Proposed Development, and has reduced the adverse impacts as far as possible, while preserving the considerable benefits it will deliver.
- 3.66 These benefits include the substantial contributions that the Revised Proposed Development will make to renewable energy generation targets and carbon emission reductions. Furthermore, as described in detail in the 2023 Planning Statement, the Revised Proposed Development remains committed to the delivery of a series of nature-positive proposals including significant biodiversity enhancement, landscape mitigation and improvements, as well as local benefits focused on improving the



recreation, tourism and cultural heritage offer of the local area. These are set out in full in the 2023 Planning Statement and remain as reported. The Applicant is committed to maximising investment in the local economy in accordance with NPF4 Policy 11(c) and the Revised Proposed Development is expected to result in an approximately £510 million in total investment, generating considerable GVA at local and national level (see FEI 'Maximising Socio-economic Benefits' Report).

- 3.67 On balance, with the overriding benefits of the Revised Proposed Development in relation to its contributions to net zero targets, ecological and community benefits, it is considered acceptable with regard to the relevant policies of NPF4. The proposed Design Changes demonstrate that landscape and visual impacts are localised and appropriate design mitigation has been applied, in line with Policy 11(e)(ii). Significant design mitigation has been applied to respond to consultee comments. In the context of the significant effects being localised in nature, it is notable that no effects have been identified with respect to any nationally designated site. Although significant landscape and visual effects would be experienced within the Upper Clyde Valley and Tinto SLA, this would not result in a significant effect on its integrity or the special qualities for which it has been identified. The Revised Proposed Development is considered acceptable with regard to NPF4 Policy 4, Policy 11 and the relevant policies of SLLDP2.
- 3.68 The design response regarding heritage receptors brings the Revised Proposed Development further in line with Policy 11(e) and Policy 7 (historic assets and places) including a clear basis for the scheme to be supported under Policy 7(h) given the Applicant has made the changes HES has requested in order to reduce effects and safeguard the integrity of the setting of Auchensaugh Hill cairn. Through the demonstration of policy compliance with the relevant policies of NPF4, the Revised Proposed Development is also considered to demonstrate alignment with local planning considerations, including key SLLDP2 policy Volume 1 Policy 18: Renewable Energy and other relevant topic policies (see 2023 Planning Statement).
- 3.69 The proposed Design Changes also includes a meaningful design response, including removal of T9, to avoid and minimise effects on peat as far as possible in accordance with the mitigation hierarchy. The Revised Proposed Development has fully addressed the feedback provided by SEPA and demonstrates further policy compliance with NPF4 Policy 5 and the relevant policies of SLLDP2.
- 3.70 Further to this, and in accordance with NPF4 Policy 1 (tackling the climate and nature crises) and Policy 11 (energy), significant weight should be given to the global climate crisis and renewable energy targets, thereby ensuring that significant weight is afforded to the substantial contribution of the Revised Proposed Development.
- 3.71 The 2025 FEI Report also provides a detailed assessment of the effects of the Revised Proposed Development with regard to ornithology, ecology, noise, traffic and ground conditions. The conclusions of these chapters have been used to demonstrate continued policy alignment of the Revised Proposed Development with the relevant policies of the statutory Development Plan.



4. CONCLUSIONS

- 4.1 This Planning Statement Addendum provides an update to the 2023 Planning Statement. It reaffirms the position in favour of the Revised Proposed Development, taking into account the balance of issues regarding the reduced residual significant effects (landscape and visual and historic environment only) against the significant benefits the Revised Proposed Development will deliver with regard to energy generation and storage contributions, carbon emissions reductions, socio-economic opportunities, biodiversity enhancements and range of community benefits.
- 4.2 **Chapter 2: Renewable Energy and the Climate Emergency – 2025 Policy Update** provides an update to Chapter 4 of the 2023 Planning Statement. It summarises policy updates of key relevance to the Revised Proposed Development and demonstrates how national renewable energy, climate and economic strategy continues to be reinforced and strengthened by the policy position of the Scottish Government, with regards to onshore wind, tackling the climate crisis and implementing a just transition across the economy. Furthermore, this chapter signposts the introduction of the UK Government Clean Power 2030 Action Plan, marking a step change and strengthening of UK Government position with regards to scaling up and increasing the pace of renewable energy deployment across the UK. This includes acknowledging the role of onshore wind in Scotland. Overall, Chapter 2 of this Planning Statement Addendum reaffirms the high-level policy support the Revised Proposed Development draws. This should be a key consideration in the decision-making process.
- 4.3 **Chapter 3: Planning Policy Appraisal** of this Planning Statement Addendum provides an updated appraisal of the Revised Proposed Development against the Development Plan, including the key determining policies of NPF4 and the South Lanarkshire Local Development Plan 2. To focus the discussion on the Design Change and re-assessment of environmental effects, following the 2023 Planning Statement, this appraisal demonstrates compliance with national and local landscape and visual and historic environment policy, as well as other key policy with respect to soils, biodiversity enhancement, ornithology and ecology. It concludes that the Revised Proposed Development, for which consent is being sought, is considered to be acceptable, on balance, in relation to Schedule 9 of the Electricity Act 1989 and other material considerations, with regard to the Development Plan.
- 4.4 The likely significant effects of the Revised Proposed Development relate to landscape and visual impacts and historic environment only. As is evidenced by the proposed design revisions, the Applicant has taken clear and intentional action to deliver effective and meaningful design mitigation, ensuring that these effects are minimised as far as practicable, in balance with the extensive positive benefits that the Revised Proposed Development will bring in terms of renewable energy generation and contributions to fighting the increasingly urgent threat of the climate emergency.
- 4.5 This Planning Statement Addendum should be read in conjunction with the 2023 Planning Statement, which summarises in depth the key benefits of the Proposed Development with regard to carbon emissions reductions, biodiversity and habitat enhancement, socio-economic benefits, access and recreation improvements and community benefits.
- 4.6 NPF4 p.98 that *‘The policies should be read as a whole’*. This is reiterated in the Chief Planner letters from 8th February 2023 and again in 22 November 2023, which noted that *‘There remains a need to weigh up all relevant policies and factors in applying planning judgement....’*
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- 4.7 Looking at NPF4 “as a whole” and particularly the key twin objectives of tackling the climate emergency and the nature crisis, a reasonable assessment of the Revised Proposed Development concludes that it does accord with the document as a whole and can contribute positively to the Intent and Outcomes of all key policies, including community wealth building objectives and biodiversity enhancement. The Revised Proposed Development also complies with all aspects of Policy 11 (Energy) that underpins the determination of the Application.
- 4.8 As such, it is respectfully recommended that consent be granted for the Revised Proposed Development.

