Euchanhead Renewable Energy Development

AEI Planning Statement Addendum

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1.0 Introduction

1.1 On the 30th October 2020, ScottishPower Renewables (UK) Limited (SPR) (the Applicant) submitted an application to the Scottish Ministers for consent under Section 36 of the Electricity Act 1989, and deemed planning permission, for the Euchanhead Renewable Energy Development (the proposed Development) (Energy Consents Unit Reference: ECU00002141). The proposed Development comprised 21 wind turbines (with a blade tip height of up to 230m), approximately 31.5MW of battery energy storage, and associated ancillary infrastructure.

1.2 The Site of the proposed Development is located predominantly within the Dumfries and Galloway Council (DGC) administrative area. However, part of one of the proposed access options (Access Route A) to the Site from the public highway lies with the East Ayrshire Council (EAC).

1.3 Following the submission of the application, formal consultation with consultees took place throughout 2020, 2021 and the early part of 2022. There was also ongoing consultation with the DGC throughout 2023 and 2024. DGC have not issued a full formal response (to the October 2020 application) to the ECU.

1.4 In response to consultee comments and discussions between the Applicant and DGC, a number of amendments to the proposed Development are proposed. In summary, the number of wind turbines has been reduced from 21 to 19 with associated infrastructure changes, and the overall blade tip height of five turbines has been reduced. Section 2.0 provides further information.

1.5 The Applicant has submitted Additional Environmental Information (AEI) to the Scottish Ministers to provide additional information relating to the EIA Report, explain the amendments to the proposed Development (and where appropriate re-assess potential impacts) and address any key points that have been raised by consultees during the consultation process for the application.

Purpose of This Statement

1.6 The application was accompanied by a Planning Statement that detailed the legislative framework for consideration of the application and identified material considerations that the Scottish Ministers are required to take into account in their assessment. The Planning Statement assessed the planning balance and acceptability of the proposed Development against relevant planning policy, concluding that the proposed Development was in accordance with the relevant policy. Furthermore, it concluded that any potential adverse effects of the proposed Development would not outweigh its positive climate change, renewable energy and socio-economic benefits. On that basis, it was concluded that section 36 consent and deemed planning permission should be granted for the proposed Development.

1.7 Since October 2020, new policy and guidance has been published that is relevant to that is relevant to the determination of this application. The Applicant submitted a supplementary statement in April 2023 to consider the implications of National Planning Framework 4 (NPF4), the Onshore Wind Policy Statement (OWPS) as

well as the Draft Energy Strategy and Just Transition Plan. Further policy updates are considered in this AEI Planning Statement Addendum.

1.8 Following this introductory section, this AEI Planning Statement Addendum is structured as follows:

- Design Amendments to the proposed Development;
- Onshore Wind Sector Deal;
- Clean Power 2030;
- Progress Towards Targets;
- Local Development Plan;
- Conclusion.

1.9 This statement should be read in conjunction with the documentation previously submitted by the Applicant, in particular the Planning Statement, NPF4 Statement and the EIA Report.

2.0 Design Amendments to the Proposed Development

2.1 In response to consultee comments and discussions with DGC (including a design meeting in 2024), a number of amendments to the proposed Development have been made. **Table 2-1** provides an outline of the proposed design amendments which are illustrated on **AEI Figure 3.1**.

Table 2-1: Amendments to Proposed Development

Site Infrastructure	Summary of Design Amendments
Reduced wind turbine number	The number of turbines has been reduced from 21 to 19 with the removal of turbines 20 and 21, including the associated crane pads / laydown areas.
Reduced overall tip height	The blade tip height of turbines 9, 10, 11, 18 and 19 has been reduced from 230m to 200m.
Track length changes	Removal of approximately 1,130.72m of proposed access track associated with turbine 20, and removal of approximately 1,231.85m of proposed access track associated with turbine 21.

2.2 The design principles are discussed in **AEI Chapter 2: Site Description and Design Evolution** and further details of the proposed Development are provided in **AEI Chapter 3: Description of Development**.

3.0 Climate Change and Renewable Energy

Onshore Wind Sector Deal

3.1 The Scottish Government's Onshore Wind Policy Statement (OWPS) was published in December 2022 and set out the Scottish Government's target to deploy 20GW of onshore wind in Scotland by 2030. Further details on the OWPS are presented in Section 3.1 of the submitted NPF4 Statement.

3.2 Section 2.4 of the OWPS gives significant importance to the Onshore Wind Sector Deal, which is described as a shared commitment between the Scottish Government and the onshore wind industry to deliver on Scotland's onshore wind ambitions while supporting a just transition to net zero**.** It recognises the importance of the Onshore Wind Sector Deal as a central mechanism for delivery of the OWPS policy's ambitions.

3.3 The Scottish Governments and the onshore wind farm industry's commitments within the Onshore Wind Sector Deal include:

- support the enhancement of current skills and training provisions through further higher education and training to focus on delivery of the needs of the wind industry;
- continue to collaborate with local communities, building on good practices to enhance its existing 'good neighbour' approach through engagement at all stages of the project's lifecycle and offering impactful community benefits and practical routes to shared ownership;
- new onshore wind projects will enhance biodiversity and optimise land use and environmental benefits;
- reduction in time taken to determine Section 36 applications for onshore wind farm projects by increasing skills and resources, and by streamlining approaches to scoping EIA Reports;
- develop evidence to support a more strategic approach to delivering the investment in our electricity network and to inform a coordinated approach to the transportation of wind turbine components across Scotland's road network; and
- deliver cooperative coexistence between onshore wind deployment and safe aviation operations.

3.4 The proposed Development would contribute to the 20GW of onshore wind energy which could be connected to the grid network by the end of 2030.

Clean Power 2030

3.5 The 'Clean Power 2030 Action Plan: A new era of clean electricity' (UK Government, 2024), published in December 2024 sets out the actions required to accelerate delivery of clean energy across the UK by 2030 and defines the UK Government's role in the clean energy transition to work with industry to unlock barriers and to take an innovative approach.

3.6 The Action Plan states:

"*Clean power by 2030 will herald a new era of clean energy independence and tackle three major challenges: the need for secure and affordable energy supply, the creation of essential new energy industries supported by skilled workers in their thousands, the need to reduce greenhouse gas emissions and limit our contribution to the damaging effects of climate change. Clean power by 2030 is a sprint towards these essential goals*."

3.7 The Action Plan sets a target of achieving 27-29GW of operational onshore wind in the UK by 2030. As at quarter 2 of 2024, there was 14.2GW of operational onshore wind capacity in the UK, with a further 4.4GW committed or under construction. There is therefore a significant gap to be filled to reach the 2030 target for operational onshore wind capacity. The Action Plan notes that:

"*Scotland's significant renewable energy potential, strong pipeline of projects, and growing supply chain will be essential to achieving a secure, affordable and clean power system across Great Britain. Scotland's renewable energy capacity continues to grow, with a strong pipeline of future projects that will play a key role in decarbonising the power system across the UK*."

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

3.8 The Climate Change (Emission Reduction Targets) (Scotland) Act came into force on 22 November 2024. The 2024 Act repeals the annual and interim emissions reduction target framework that was established under the Climate Change (Emissions Reduction Targets) (Scotland) Act 2019, and establishes a carbon budget approach to target setting. The 2024 Act also makes provision for a new Climate Change Plan to be published that reflects the carbon budgets.

4.0 Progress Towards Targets

4.1 The Climate Change Committee (CCC) produced a report to the Scottish Parliament entitled 'Progress in reducing emissions in Scotland' in March 2024 which concluded that Scotland's 2030 climate goals are no longer credible.

4.2 Further to the CCC Report, the Cabinet Secretary made a statement to the Scottish Parliament on 18 April 2024 entitled 'Climate Change Committee Scotland Report – Next Steps: Net Zero Secretary Statement' noting that:

- The Scottish Government has an *"unwavering commitment to ending our contribution to global emissions by 2045 at the latest, as agreed by Parliament on a cross-party basis"*.
- *"And with this in mind, I can today confirm that working with Parliament on a timetable, the Scottish Government will bring forward expedited legislation to address matters raised by the CCC and ensure our legislative framework better reflects the reality of long-term climate policy making."*

4.3 The Climate Change (Emissions Reduction Targets) (Scotland) Act 2024, which came into force on 23 November 2024, abolished the 2030 and 2040 interim targets, and introduced the framework for a carbon budget-based approach for setting emissions reduction targets which matches the approach taken at the UK level and in Wales.

4.4 The Scottish Government consider that carbon budgets, which cover a five-year period, provide a more reliable and consistent framework for assessing sustained progress in the actions and policies that contribute to ensuring that the overarching goal of net zero emissions by 2045 is achieved.

4.5 The most recent CCC's progress report to the UK Parliament 'Progress in reducing emissions' was published in July 2024, noting that "*urgent action is needed to get on track for the UK's 2030 target*". The CCC Report goes on to identify priority actions noting that "*the UK should now be in a phase of rapid investment and delivery. Yet almost all our indicators for low-carbon technology roll-out are off track, with rates needing to significantly ramp up. By 2030: annual… onshore wind installations will need to double*".

4.6 Energy Statistics for Scotland – Q4 2024 (March 2025) (latest available) notes the following key achievements:

- *"A record 38.4 TWh of renewable electricity was generated in Scotland in 2024 – a 13.2% increase compared from 33.9 TWh in 2023.*
- *In 2024, there was 17.6 GW of renewable electricity capacity in Scotland – a 14.3% increase from 15.4 GW in 2023.*
- *As of the end December 2024, there were 904 projects with an estimated capacity of 65.4 GW in the planning pipeline in Scotland. Of these, 640 were renewable electricity generation projects with an estimated capacity of 37.5 GW and 264 were electricity storage projects with an estimated capacity of 27.9 GW.*

- *Scotland continues to generate more electricity than it needs. In 2024, there was 19.7 TWh of net electricity exports to other UK nations.”.*

5.0 Local Development Plan

Dumfries and Galloway Council

5.1 There has been no change to the local development plan in force for the majority of the Site since the application was made in 2020, which remains the Dumfries & Galloway Local Development Plan 2 (DGLDP2) adopted in October 2019. The conclusions of the Planning Statement in respect of compliance with the relevant policies of DGLDP2 remain valid for the amended proposed Development.

5.2 Appendix C to the adopted supplementary guidance *Wind Energy Development: Development Management Considerations* (WED) has been replaced with a new *Dumfries and Galloway Wind Energy Landscape Sensitivity Study* (DGWLSS) which was adopted in February 2025. The DGWLSS revises and updates the 2017 Dumfries and Galloway Wind Farm Landscape Capacity Study (DGWLCS) in response to changes in baseline conditions and to reflect updated guidance on landscape sensitivity assessment.

5.3 The DGWLSS aims to support strategic spatial planning for wind energy development and considers broad landscape and visual sensitivities only. The executive summary of the DGWLSS states that the strategic guidance within the DGWLSS "*does not replace the need for detailed Landscape and Visual Impact Assessment of specific wind energy proposals*".

5.4 For the purposes of this proposal, the DGWLSS has therefore been used as a source of background information and to inform judgements about landscape sensitivity in the updated landscape and visual impact assessment as reported in **AEI Chapter 7: Landscape and Visual Impact Assessment**.

East Ayrshire Council

East Ayrshire Council Local Development Plan 2

5.5 The East Ayrshire Council Local Development Plan 2 (EACLDP2) was adopted in April 2024. EACLDP2 includes supplementary guidance on Energy and EV Charging. The guidance sets out in detail the Council's approach to renewable energy developments as well as providing further information on the criteria against which renewable energy developments will be assessed, underpinning Policy RE1. The guidance has been used to inform the assessment of the proposed Development against the relevant Policy RE1 criteria.

5.6 The only element of the proposed Development that will be located within East Ayrshire is part of Access Route A. It is however acknowledged that regard still has to be made to how this element of the proposed Development would affect matters raised in the EACLDP2 such as impacts on carbon rich soils, deep peat and peatland habitats; effects on natural heritage; impacts on the historic environment; effects on hydrology and the water environment; and impacts on road traffic and adjacent trunk roads.

5.7 The EACLDP2 supports all forms of renewable energy and aims to ensure East Ayrshire plays its part in tackling the climate emergency and reducing greenhouse gas emissions. This includes support for wind energy development, recognising it as an essential part of the current and future energy mix. Policy SS1: Climate Change states that "*the Council will give significant weight to the Global Climate Emergency*" when considering all development proposals.

5.8 The key policy relating to onshore wind development is Policy RE1: Renewable Energy which states that proposals for renewable energy generation will be supported where they are acceptable when assessed against the criteria provided. Table 6-1 provides an assessment against the Policy RE1 criteria where they are relevant to the elements of the proposed Development located within the EAC area.

Table 5-1 Policy RE1 Relevant Criteria Assessment

Relevant Policy RE1 Criteria	Policy Assessment
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.	As noted in the Planning Statement, proposed access route option A is partly located within a Sensitive Landscape Area (SLA) as identified in the adopted EACLPD2. In summary, the LVIA identifies that as none of the proposed wind turbines would be located within the SLA, that the main impacts of the proposed Development would be on the scenic quality experienced by recreational receptors within the East Ayrshire Southern Uplands and Glen Afton. It establishes that whilst there would be some significant effects on these recreational users as a result of the proposed Development, this area is already strongly influenced by wind energy development. There is no change to the proposed access route, therefore the conclusions of the Planning Statement that whilst the scenic qualities of the area would be affected by the proposed Development, that the overall integrity of the landscape character of the SLA would not be compromised.
Effects on biodiversity, including impacts on birds, with particular reference to European sites and other national and local designations.	As noted in the Planning Statement, proposed access route option A lies within the Afton Uplands Provisional Local Wildlife Site (pLWS). There is no change to the proposed access route, therefore the conclusions of the Planning Statement that the proposed Development would not result in any unacceptable impacts upon any local nature conservation sites and would not conflict with the aims and objectives of the LBAPs for Dumfries & Galloway or East Ayrshire remain valid.
Impacts on the historic environment.	There are no scheduled monuments, listed buildings, Inventory Gardens and Designed Landscapes or inventoried battlefields within the Site. Although there are a number of archaeological features within the Site, the layout of the proposed Development has been designed to avoid these assets. Outwith the site, the cultural heritage assessment concludes that there would be no significant indirect effects as a result of the proposed Development (both in isolation and cumulatively) upon any scheduled monuments, listed buildings, conservation areas or

Relevant Policy RE1 Criteria	Policy Assessment
	gardens, Inventory Gardens and Designed Landscapes or inventoried battlefields.
Effects on hydrology, the water environment, flood risk and groundwater dependent terrestrial ecosystems.	There is no changed proposed to proposed access route A, therefore the conclusions of the Planning Statement that the proposed Development would not result in any unacceptable impacts upon hydrology, the water environment, flood risk or GWDTEs, when taking into account the proposed mitigation.
Impacts on public access, including long distance walking and cycling routes and scenic routes.	The construction of the proposed Development will require temporary diversion of footpaths including part of the Southern Upland Way. As detailed in the Planning Statement, SPR is committed to enhancing recreational and public access opportunities at the Site as part of the proposed Development. These measures include retaining the proposed diversion to the Southern Upland Way around the western boundary of the Site. There is no change to the proposed access route, therefore the conclusions of the Planning Statement as they relate to public access remain valid.
Impacts on trunk roads and road traffic, during construction, operation and decommissioning.	There is no changed proposed to proposed access route A, therefore the conclusions of the Planning Statement that the proposed Development (both individually and cumulatively) would not result in any significant issues on the transport network or road safety, remains valid.

5.9 The Soils Map within the EACLDP2 shows that small parts of Access Route A lie in areas mapped as being Peat & Carbon Rich Soils (Class 1) and partially within smaller areas of Peat & Carbon Rich Soils (Class 2). As noted in the Planning Statement, the design of the access track has sought to minimise disturbance of peatland soils. Policy NE11 notes that where development is proposed on peat and other carbon-rich soils, a detailed site-specific survey of peatland habitats is required. Whilst there is a presumption against the disturbance and/or removal of Class 1, 2 and 5 peatland, an exception is made where it is essential for the "*generation of energy from renewable sources that optimises the contribution of the area to greenhouse gas emissions reduction targets*". There has been no change to the design of the proposed access therefore the conclusions of **EIA Report Chapter 10: Hydrology, Hydrogeology, Geology and Soils** remain valid.

5.10 The Planning Statement's conclusion that the proposed Development would not result in any unacceptable impacts upon carbon rich soils, including peat remains valid. The proposed Development is therefore in accordance with the policy NE11 with regards to impacts upon peat and soils.

5.11 It is concluded that the proposed Development accords with the relevant provisions of the EACLDP2.

6.0 Conclusion

6.1 It is acknowledged that there have been a number of changes to the national energy policy context since the application was submitted, however the thrust of the relevant legislation, policies and action plans in terms of delivering a clean energy transition remains similar. It is considered that the proposed Development draws support from these national policy documents as it would make a significant contribution to the Scottish Government target of having 20GW of onshore wind energy capacity installed by 2030.

6.2 The proposed amendments to the proposed Development do not alter the conclusions of the Planning Statement in respect of compliance with the relevant policies of DGLDP2. Furthermore, this Planning Statement Addendum as demonstrated that the proposed Development accords with the relevant provisions of the EACLDP2. The positive contribution that the proposed Development would make to combatting climate change, increasing renewable energy deployment and furthering socio-economic benefits significantly outweigh any potential adverse impacts.

6.3 It is concluded that the conclusion of the Planning Statement, that section 36 consent and deemed planning permission should be granted for the proposed Development, remains valid.

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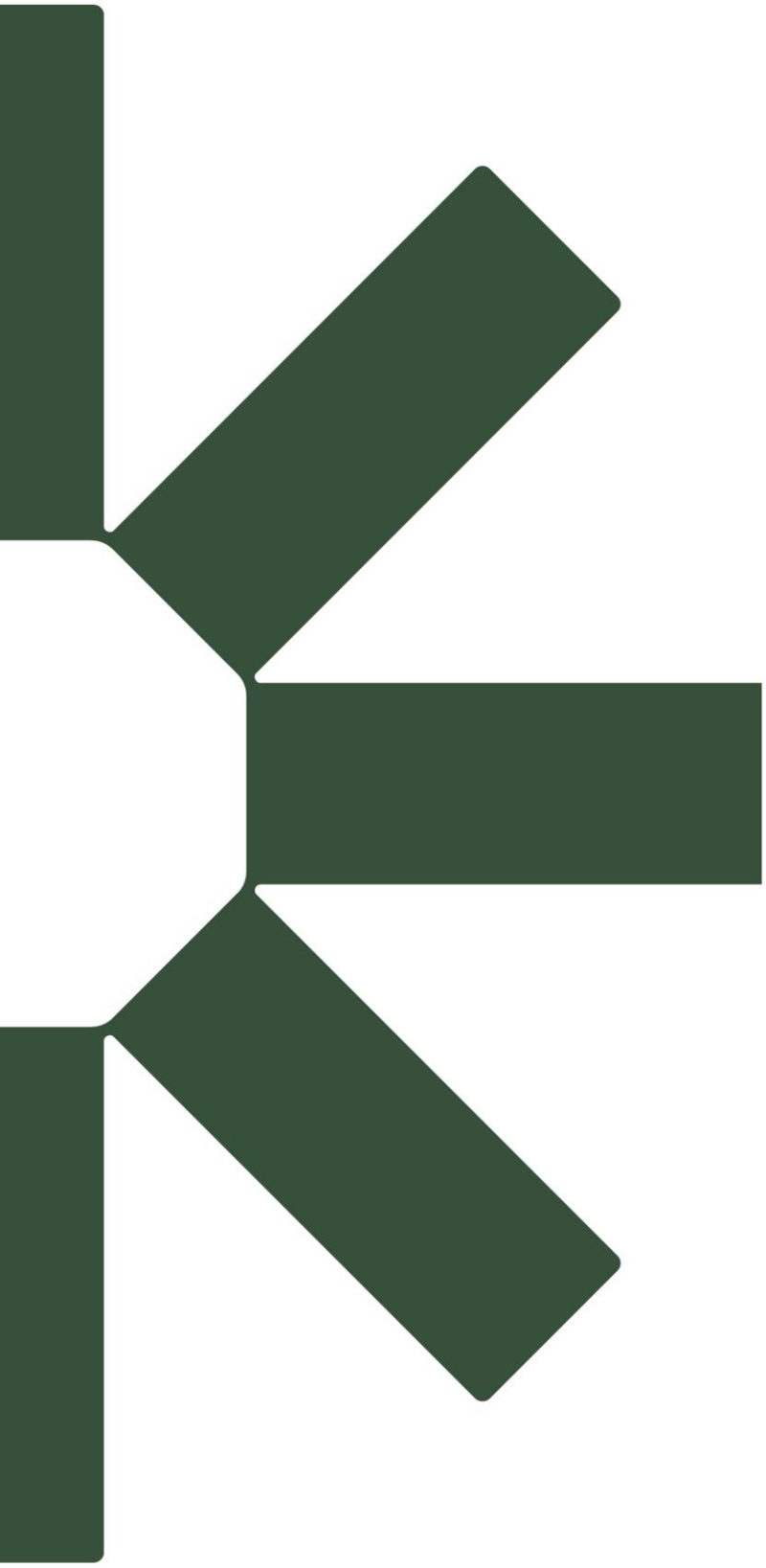

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