DAVID BELL PLANNING
CHARTERED TOWN PLANNERS

West Torrisdale Wind Farm

Section 36 Application:

Planning Statement Update

September 2025

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Contents

1. Introduction

1.1 Background

1.1.1 This Planning Statement Update has been prepared by David Bell Planning Ltd ('DBP') on behalf of ESB Asset Development UK Limited ('the Applicant') in relation to the proposed West Torrisdale Wind Farm ('the Proposed Development') on land located approximately 4 km south west of Carradale within the Argyll & Bute Council ('the Council' or 'ABC') administrative area.

1.1.2 As the Proposed Development has a generating capacity in excess of 50 megawatts ('MW'), consent is required from Scottish Ministers under Section 36 of the Electricity Act 1989 ('the 1989 Act'). In addition, a request is being made by the Applicant that planning permission is deemed to be granted under Section 57(2) of the Town and Country Planning (Scotland) Act 1997, as amended ('the 1997 Act').

1.1.3 The application for consent for 9 turbines and a battery energy storage system (BESS) was submitted to the Energy Consents Unit ('ECU') of the Scottish Government in January 2025 and was accompanied by an Environmental Impact Assessment Report ('EIA Report') which presents the findings of an EIA undertaken in accordance with the Electricity Works (Environmental Impact Assessment) (Scotland) Regulations 2017 ('the EIA Regulations'). The EIA Report presents information on the identification and assessment of the likely significant environmental effects of the Proposed Development. The application has ECU Reference ECU00002224.

1.1.4 Following receipt of consultation responses, the Applicant took the decision to prepare an Additional Information (AI) Report to address information requests from consultees made during the consultation period on the application.

1.1.5 The Planning Statement for the Proposed Development which was completed in December 2024 contained a detailed appraisal of the proposal against the provisions of National Planning Framework 4 ('NPF4') and the Council's Local Development Plan ('LDP') and climate change and energy policy considerations.

1.1.6 This Planning Statement Update does not repeat the past policy submissions, in particular those relating to NPF4 which still remain valid. However, it considers the proposal against the current energy, climate change and planning policy framework. An update is provided in relation to the energy and planning policy matters which have emerged since December 2024 in order that the latest position is before the Council and the Scottish Ministers.

1.1.7 This Planning Statement Update also considers the balance between the potential benefits and the effects which may arise and concludes as to the overall acceptability of the Proposed Development in relation to the AI submissions and the up-to-date energy and planning policy framework and relevant material considerations.

1.1.8 As set out in the AI Report, further information is provided in relation to the following topics:

- Seascape, Landscape and Visual;
- Ecology;
- Ornithology;
- Hydrology and Hydrogeology;
- Geology and Soils; and
- Noise.

1.2 Structure of Statement

1.2.1 This Planning Statement Update is structured as follows:

- **Chapter 2** sets out the up-to-date position with regard to the renewable energy policy and emissions reduction legislative framework, highlighting changes which have emerged since January 2025;
- **Chapter 3** summarises the benefits that would arise from the Proposed Development;
- **Chapter 4** presents overall conclusions and consideration of the planning balance with reference to the conclusions set out in the AI Report and the updates to the planning and energy policy framework.

2. The Renewable Energy Policy & Legislative Framework: Update

2.1 Introduction

2.1.1 This Chapter refers to the renewable energy policy and emissions reduction legislative framework with reference to relevant international, UK and Scottish provisions. The framework of international agreements and obligations, legally binding targets and climate change global advisory reports is the foundation upon which national energy policy and greenhouse gas emissions ('GHG') reduction law is based. This underpins what can be termed the need case for renewable energy from which the Proposed Development can draw a high level of support.

2.1.2 There is clear and consistent policy support at all levels, from international to local, for the deployment of renewable energy generally, to combat the global climate crisis, diversify the mix of energy sources, achieve greater security of supply, and to attain legally binding emissions reduction targets.

2.1.3 UK and Scottish Government renewable energy policy and associated renewable energy and electricity targets are important considerations. It is important to be clear on the current position as it is a fast-moving topic of public policy. The context of international climate change commitments is set out. This is followed by reference to key UK level statutory and policy provisions and then a description of relevant Scottish Government statutory and policy provisions. Key updates include the following which are referred to throughout the chapter:

> At the UK Government level:

- The Seventh Carbon Budget (2025); and
- The Onshore Wind Taskforce Strategy (2025).

> At the Scottish Government level:

- CCC Report, Scotland's Carbon Budgets, Advice for the Scottish Government (2025).

2.2 UK Climate Change & Energy Legislation & Policy

The Climate Change Act 2008 & Carbon Budgets

2.2.1 The Climate Change Act 2008 ('the 2008 Act') provides a system of carbon budgeting. Under the 2008 Act, the UK is now committed to a net reduction in GHG emissions of 100% against the 1990 baseline by 2050, with Scotland committing to net zero by 2045.

2.2.2 The 2008 Act also established the CCC which advises the UK Government on emissions targets, and reports to Parliament on progress made in reducing GHG emissions.

2.2.3 The CCC has produced seven, four yearly carbon budgets, covering 2008 – 2042. These carbon budgets represent a progressive limitation on the total quantity of GHG emissions to be emitted over the five-year period as summarised in **Table 2.1** below. Essentially, they are five yearly caps on emissions.

2.2.4 These legally binding 'carbon budgets' act as stepping-stones toward the 2050 target. The CCC advises on the appropriate level of each carbon budget and once accepted by Government, the respective budgets are legislated by Parliament.

Table 2.1: Carbon Budgets and Progress[1]

Budget	Carbon budget level	Target Reduction below 1990 levels	Progress on Budgetary Period (reduction amount v Target)
1st carbon budget (2008 – 2012)	3,018 $MtCO_2e$	26%	-27%
2nd carbon budget (2013 – 2017)	2,782 $MtCO_2e$	32%	-42%
3rd carbon budget (2018 – 2022)	2,544 $MtCO_2e$	38% by 2020	-50%[2]
4th carbon budget (2023 – 2027)	1,950 $MtCO_2e$	52% by 2025	n/a
5th carbon budget (2028 – 2032)	1,725 $MtCO_2e$	57% by 2030	n/a
6th carbon budget (2033 – 2037)	965 $MtCO_2e$	78% by 2035	n/a
7th carbon budget (2038 – 2042)	535 $MtCO_2e$	87% by 2042	n/a
Net Zero Target	100%	By 2050	

2.2.5 The Seventh Carbon Budget ('CB7') was published by the CCC in February 2025. The CCC's recommended level for CB7, namely a limit on the UK's GHG emissions over the five-year period 2038 to 2042 is 535 $MtCO_2e$ including emissions from international aviation and shipping.

2.2.6 Page 12 of the CB7 states:

"*By the middle of the Seventh Carbon Budget on our pathway, emissions in the UK will be only a quarter of the level they are today, and 80% lower than levels in 1990 (90% lower excluding emissions from international aviation and shipping.) Achieving this will require a significant reduction in emissions across sectors including surface transport, buildings, industry and agriculture*."

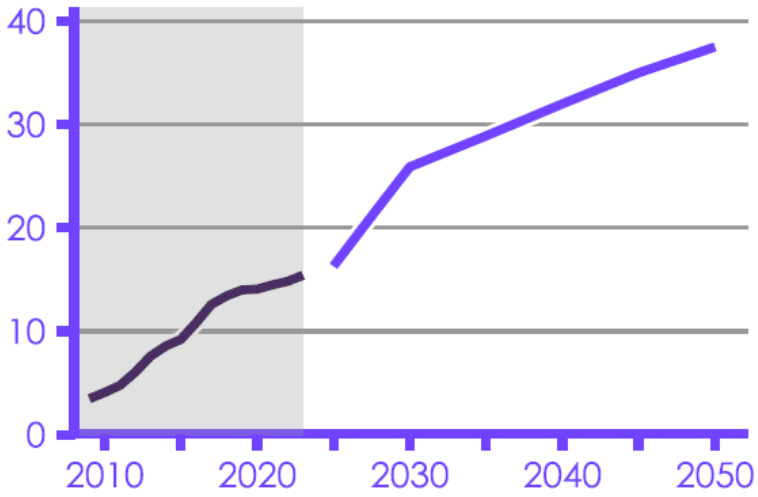
2.2.7 It sets out (page 12) that achieving CB7 will mean that UK based renewable energy provides the bulk of generation and this will replace oil and gas across most of the economy. It adds that "*this requires twice as much electricity as today by 2040*".

2.2.8 It further states that low carbon supply by 2040 will see offshore wind grow sixfold from 15 GW of capacity in 2023 to 88 GW by 2040. It adds that "*onshore wind capacity doubles to 32 GW by 2040 and solar capacity increases to 82 GW*" (page 13). The anticipated growth of onshore wind capacity is shown in the Report (page 109) and illustrated in **Figure 2.1** below.

[1] Source: Climate Change Committee (CCC).

[2] Confirmed by CCC in 'Final Statement for the Third Carbon Budget' May 2024. By the end of the period in 2022, UK net GHG emissions were 50% lower than the base year emissions.

Figure 2.1: Onshore Wind Operational Capacity (GW) in CCC 'Balanced Pathway'



2.2.9 In relation to the increase in onshore wind capacity, CB7 sets out (page 106) that:

"*this will require recent annual installation rates to treble this decade, requiring installation rates comparable to the annual rollout rates previously sustained during the mid 2010s*".

The Onshore Wind Taskforce Strategy (2025)

2.2.10 The Department for Energy Security and Net Zero ('DESNZ') published the Onshore Wind Taskforce Strategy in July 2025. The strategy sets out over 40 actions, primarily Government commitments to resolve key blocks to onshore wind within the UK. The Strategy's overall aims are to boost onshore wind deployment and to deliver economic benefits for local communities, businesses and the consumer.

2.2.11 The Ministerial Forward by the Secretary of State for Energy Security and Net Zero states:

"As one of the cheapest and fastest to build sources of power we have, onshore wind will play a critical role in boosting our energy independence with clean power by 2030. The reality is that every turbine we build helps protect families, businesses and the public finances from future fossil fuel shocks.

That's why in our first 72 hours in office, we lifted the onshore wind band in England - in place for nine years under the previous Government. And it's why last July we established the Onshore Wind Taskforce to bring Government, industry and trade unions together to explore how we can radically accelerate deployment of this critical technology.

The Onshore Wind Taskforce strategy is the outcome of that work. It sets out more than 40 steps Government and industry will take to help deliver up to 29GW of onshore wind by 2030. That includes driving ambitious reforms to planning, grid connections, and routes to market, while building the supply chains and skilled workforce we need."

2.2.12 In addition, within the forward the statement by the Head of Clean Power 2030 within DESNZ states *inter alia*:

"Clean Power 2030 is our ambitious mission to grow rapidly Britain's clean electricity infrastructure, reducing Britain's dependency on imported oil and gas, securing key clean industries and readying the country for the expected growth in electrical demand over the next 20 years.

Our Clean Power Action Plan targets a near doubling of onshore wind capacity up to 29GW by 2030. That will require rapid development of new onshore wind across Britain and repowering of existing sites to bring British consumers some of the cheapest homegrown power that can be produced. We are already working with NESO to slash the queue of projects waiting to connect to the grid to accelerate the best onshore wind development.

Rapid deployment of onshore wind is our first line of defence against future gas price spikes - every megawatt added displaces imported gas in the power system. With the steps in this new strategy, we will cement the growth of an important homegrown industry. The momentum behind clean power continues to grow."

2.2.13 The various commitments and actions within the strategy cover:

- Scoping, planning and consenting improvement for onshore wind projects;
- Networks and systems reform;
- Communities and public perception actions;
- Aviation and defence commitments to improve the interface between wind energy and civil and military radar and related matters;
- Finance and routes to market; and
- Supply chains, skills and workforce.

2.2.14 The Strategy refers to the Government's Clean Power Action Plan, which was published in December 2024 and which set out a pathway to achieving the mission of clean power by 2030. Page 10 of the strategy states that:

"All routes to achieving this mission are reliant on mass deployment of renewable electricity technologies, including onshore wind. The Clean Power Plan stated that to decarbonise the power sector by 2030, 27-29GW onshore wind will be needed within GB[3]*.* That is a significant increase above the current installed capacity, which stands at 14.8 GW in GB (over 16GW in the UK)".

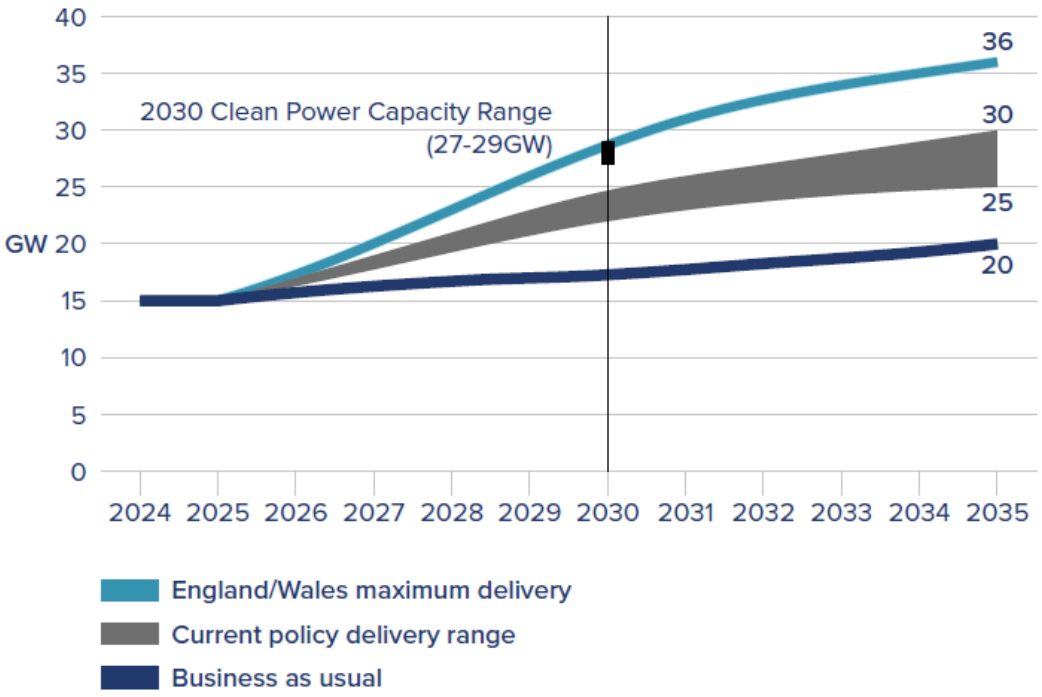
2.2.15 It is explained that the delivery of up to 29 GW of onshore wind by 2030 would involve around 10-12 GW more than would have been deployed under historic growth rates, with England contributing around 2 GW by 2030.

2.2.16 The strategy also emphasises the significant economic opportunity that further onshore wind deployment will deliver (page 10). It states that meeting the onshore wind 2030 targets together with the actions within the Strategy, could deliver up to 45,000 direct and indirect jobs in Great Britain and result in £70 million per year of extra investment in community benefits.

2.2.17 At page 18 of the Strategy, reference is made to illustrative deployment scenarios which it states emphasises "*the challenge in meeting the 2030 clean power range in GB which will require significant deployment in Scotland, England and Wales*." This is illustrated in **Figure 2.2** below.

[3] The strategy explains that this means delivery of a system with at least 95% of GB's generation being produced from clean sources

Figure 2.2: Clean Power Deployment Scenarios (Onshore Wind)



2.2.18 The scenarios as illustrated in **Figure 2.2** include:

- *Business as usual* - under this scenario onshore wind only reaches in the region of 17 GW by 2030 and 20 GW by 2035.
- *Current policy delivery range* - this assumes the implementation of the reform announced as part of the Clean Power 2030 Action Plan and the action set out in the Onshore Wind Taskforce Strategy. In this scenario around 25 GW is installed by 2030 and 30 GW by 2035.
- *England / Wales maximum delivery* - this is set out as the most optimistic scenario and shows the potential of increasing onshore wind deployment through strengthened policies in England and Wales. Under this scenario onshore wind deployment could reach levels consistent with the 2030 Clean Power range but also increases to in excess of 35 GW by 2035.

2.2.19 The Strategy addresses implementation and states (page 71) that the Government is committed to delivering the level of onshore wind needed by 2030 and is establishing a new Onshore Wind Council to oversee the implementation of the Strategy.

2.3 Climate Change & Renewable Energy Policy: Scotland

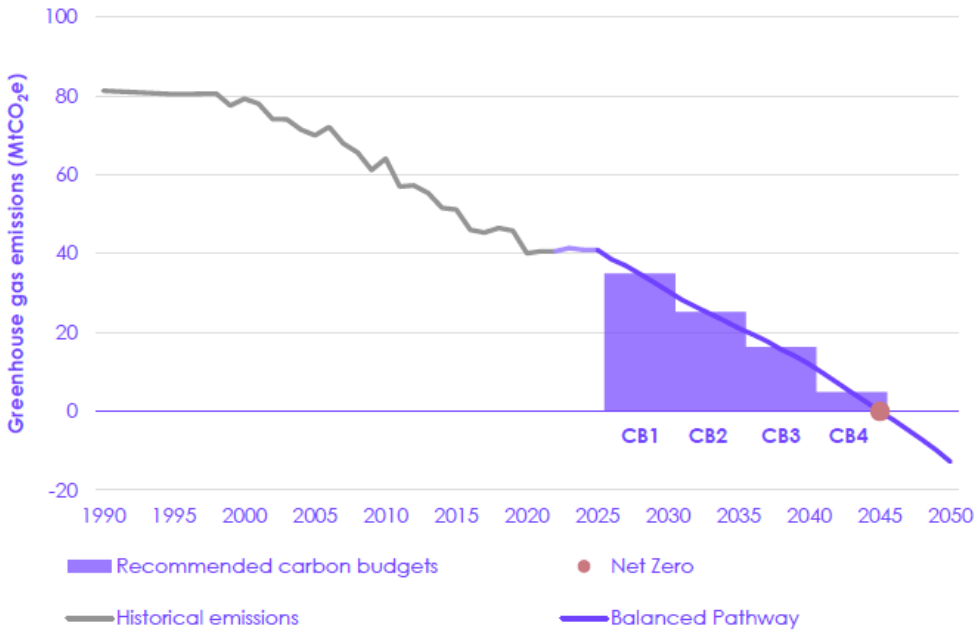
CCC Report, Scotland's Carbon Budgets, Advice for the Scottish Government (May 2025)

2.3.1 The Report sets out the CCC's advice on the level of Scotland's four proposed carbon budgets, covering the period 2026 to 2045. It recommends that the Scottish Government sets its carbon budgets, at annual average levels of emissions that are:

- 57% lower than 1990 levels for the First Carbon Budget (2026 to 2030);
- 69% lower than 1990 levels for the Second Carbon Budget (2031 to 2035);
- 80% lower than 1990 levels for the Third Carbon Budget (2036 to 2040); and
- 94% lower than 1990 levels for the Fourth Carbon Budget (2041 to 2045).

2.3.2 The recommended carbon budgets are illustrated in **Figure 2.3** below.

Figure 2.3: CCC Recommended Carbon Budgets for Scotland[4]



2.3.3 The report sets out that the CCC's advice *"shows that the proposed carbon budgets are deliverable and Scotland can achieve its 2045 Net Zero target."* (page 8)

2.3.4 It states that getting to net zero by 2045 will require immediate action, at pace and scale and adds that decisions on the exact pathway and policies are for the Scottish Government.

2.3.5 The Report explains that progress to date has largely come from electricity decarbonisation, reflecting Scotland's abundant renewable resources. It goes on to state (page 9) that:

"Action will increasingly be required in predominantly devolved policy areas to hit the Net Zero 2045 target and the proposed carbon budgets. Now that the framework for climate action has been reset, the Scottish Government has the opportunity to use its powers to match its ambitions with action."

2.3.6 The Report identifies priority actions, which over the period of the first two carbon budgets will be the remaining decarbonisation of electricity generation as well as further electrification of key technologies, particularly the roll-out of EVs and heat pumps.

2.3.7 The Report identifies the sources of future emissions reductions and notes that in the next decade, over the next two carbon budgets, they are predominantly met from electrification of key technologies across the economy and measures to reduce demand for high-carbon activities.

2.3.8 Specifically in relation to electricity and low carbon supply the Executive Summary explains (page 12) that in the Balanced Pathway set out by the CCC:

"the capacity of variable renewables in Scotland (including offshore and onshore wind and solar) more than triples from 15 GW in 2023 to 49 GW by 2035, increasing to 66 GW by 2045. This provides 98% of electricity generation in Scotland in 2035 and caters for increasing demand in Scotland and the rest of Great Britain (GB). Grid storage, use of storable fuels on the GB-wide network, and smart demand flexibility ensure a reliable supply of electricity even in adverse weather years. These technologies need to be accompanied by rapidly expanding the

[4] Source: CCC (May 2025). The Report states that the 'Balanced pathway' sets the recommended level of Scotland's carbon budgets.

transmission grid, upgrading the distribution network, and speeding up the grid connection process. To deliver clean electricity, the planning process to approve large electricity infrastructure projects in Scotland needs to be urgently improved." (emphasis added)

2.3.9 Scotland currently has approximately 17.6 GW[5] of renewables operating capacity, therefore, to achieve the Balanced Pathway figure of 66 GW by 2045 will require an additional 48.4 GW to be deployed.

2.3.10 The Report sets out in more detail the key actions to deliver the Balanced Pathway in electricity supply. At page 94 it refers to the key action for the Scottish Government which is to *"Urgently improve the planning process to approve large electricity infrastructure projects in Scotland, such as transmission lines and onshore wind farms."* citing that it can currently take up to four years to approve large electricity infrastructure projects in Scotland.

2.3.11 The Report makes reference to the Scottish Government and the UK Government's commitment to reform the energy consents system in Scotland, including through measures in the Planning and Infrastructure Bill. It states that *"Both governments should ensure that these reforms are now implemented at pace. All bodies involved in the planning and consenting process must also be adequately resourced and skilled."*

2.4 Conclusions on the Renewable Energy Policy & Legislative Framework

2.4.1 It is considered that the Proposed Development is very strongly supported by the climate change and renewable energy policy and legislative framework.

2.4.2 The trajectory, in terms of the scale and pace of action required to reduce emissions, grows ever steeper and it is essential that rapid progress is made otherwise the legally binding target in Scotland of net zero by 2045 will not be met.

2.4.3 The change from annual Scottish emission reduction targets to a system of carbon budgets has served to show that Scotland is not on track to attain net zero, and it strengthens the case for rapidly approving schemes that can contribute to this goal. The overall target of Net Zero remains unchanged.

2.4.4 Decisions through the planning and wider consenting system must be responsive to this position. Decision makers can do this by affording substantial weight to the energy policy objectives articulated above, in the planning balance in a given case.

2.4.5 In terms of the energy policy considerations, it is helpful to reference the recent position of the Scottish Ministers with regard to a Section 36 wind farm decision. Section 36 consent was granted by the Scottish Ministers on 09 May 2025 for the Chrathaich Wind Farm. From paragraph 90 *et seq* of the Decision Letter, the Scottish Ministers in commenting on the acceptability of the development stated:

"*As set out above, the seriousness of climate change, its potential effects and the need to cut carbon dioxide emissions, remain a priority for the Scottish Ministers. Scotland's renewable energy targets and climate change ambitions, energy policies and planning policies are all relevant considerations when weighing up this proposed development. NPF4, Scotland's Energy Strategy and the Onshore Wind Policy Statement ("OWPS") make it clear that renewable energy deployment remains a priority of the Scottish Government. These are all matters which should be afforded significant weight in favour of the Proposed Development."*

The transition to a low carbon economy is an opportunity for Scotland to take advantage of our natural resources to grow low carbon industries and create jobs.

The Scottish Ministers are satisfied that the deployment of this amount of renewable energy the proposed Development could generate is entirely consistent with the Scottish Government's policy on the promotion of renewable energy and its target date for net zero emissions of all greenhouse gases by 2045."

[5] Source: Scottish Government (March 2025) Energy Statistics for Scotland – Q4 2024.

2.4.6 In the most recent renewable energy policy documents referred to, there is a consistent and what might be termed a 'green thread' which ties a number of related policy matters together: namely the urgent challenge and imperative of attaining and sustaining net zero and the need to substantially increase renewable capacity, notably onshore wind.

2.4.7 The climate change and energy policy related documents referred to in the Planning Statement of December 2024 and in this Planning Statement Update confirm the Scottish Government's policy objectives and related targets, reaffirming the important role that onshore wind will play in response to the climate crisis.

2.4.8 It must follow that the need case for the Proposed Development is to be afforded significant weight in the planning balance. The way that decision makers can do that is by properly recognising the seriousness and importance of energy policy related considerations in the planning balance. It is the cumulative effect of a large number of individual projects which will move Scotland towards where it needs to be in order to attain net zero.

3. The Benefits of the Proposed Development

3.1 The Benefits: Summary

3.1.1 This Chapter summarises the benefits that would arise from the Proposed Development. These have largely not changed from those reported in the Planning Statement (2024) and are repeated here for information. The only differences relate to updated emission savings figures and references to a revised Outline Habitat Management Plan including the increased area proposed for peatland restoration.

Renewable Energy Generation

> With an installed capacity of up to 54 MW of onshore wind and 20 MW of battery energy storage system ('BESS') the Proposed Development would make a valuable and important contribution to the attainment of the UK and Scottish Government policies of encouraging renewable energy developments; and in turn contribute to the achievement of UK and Scottish Government renewable energy and net zero targets. As explained, there is now a distinct shift in policy emphasis from the displacement of higher carbon electricity generation to extending the use of electricity as the critical energy response to the climate emergency. The scale of generation is such that the Proposed Development is nationally important.

> The UK legally binding target of net zero GHG emissions by 2050 and the Scottish Government target of net zero by the earlier date of 2045 are major challenges, as explained in the previous Chapter. The Scottish Government has made it clear that onshore wind plays a vital and indeed "*mission critical*" role in the attainment of future targets in relation to helping to combat the crisis of global heating.

> The earlier that steps towards decarbonisation are introduced, the greater their contribution to limiting climate change. The Proposed Development's delivery of renewable capacity in the near term will have a disproportionately higher benefit than the same capacity delivered later.

Emissions Savings

> The carbon balance calculations establish that the Proposed Development (wind element) could result in the saving of approximately 24,882 tonnes of carbon dioxide equivalent emissions per annum over the project lifetime if a grid mix of electricity generation were used as the counterfactual position. This is the same emissions saving as reported in Technical Appendix 2.2, Volume 4 of the EIAR.

> The calculations of total carbon dioxide emission savings and payback time for the Proposed Development has decreased from 5.6 years (as reported in Technical Appendix 2.2, Volume 4 of the EIAR) to 4.7 years (as reported in Technical Appendix 6.4, Volume 3 of the AI Report) when compared to the grid fuel mix of electricity generation.

Security of Supply & Battery Storage

> The British Energy Security Strategy has been referenced in the Planning Statement (2024). It provides an increase to the requirements for both the scale and the urgency of delivery of new low carbon generation capacity, by refocussing the requirement for low-carbon power for reasons of national security of supply and affordability, as well as for decarbonisation.

- With this context, the attractiveness of onshore wind, as a proven technologies which will deliver significant benefits to consumers through decarbonisation, security of supply and affordability this decade, becomes clear.
- The Proposed Development, if consented, would provide a valuable contribution to security of supply for the wider region, Scotland and for the wider Great Britain ('GB') area. Consenting the development, would contribute to an adequate and dependable Scottish and GB generation mix, through enabling the generation of more low carbon power from indigenous and renewable resources, and would enable the Proposed Development to make a significant contribution to Scottish and wider UK energy security and decarbonisation needs.
- BESS will play a vital role in ensuring the full potential capacity of existing and future renewable energy generation is exploited and the successful transition to a net-zero future. BESS imports renewable energy when supply is typically at its highest and in excess of demand, storing it, and then exporting it back to the grid when demand is high, but supply is low (e.g. still, cloudy days).
- Furthermore, the BESS also has the potential to supply the grid with essential energy security functions including:
  - **Voltage support services:** Batteries can supply the network with quickly dischargeable energy during low voltage periods or blackouts; to date these scenarios have typically been managed by reliance on quickly dispatchable fossil fuel energy generators (typically gas peaking plants); and
  - **Grid stabilisation services (inertia):** Inertia is incredibly important for the stable operation of the electricity system; it is a by-product of coal and gas-fired generators, however renewables like wind and solar are not able to provide inertia. As older coal and gas plants come off the system and renewable energy generation becomes the dominant source of energy nationally, we need to find new ways to provide grid stability. BESS are able to provide these stability services.

Socio-Economic Benefits

- The Proposed Development would support jobs during construction and during operation across the Scottish economy. Overall, the socio-economic effects of the capital investment, employment and gross value added ('GVA') to the economy would be beneficial (short term during construction, long term during operation).
- The Proposed Development will deliver a series of economic benefits during its construction and development phase, namely:
  - £4.8 million GVA and 70 years of employment in Argyll and Bute;
  - £13.1 million GVA and 190 years of employment in Scotland; and
  - Support 120 jobs in Scotland at its peak.
- Additional economic benefits are predicted through the operational and maintenance phase of the Proposed Development, with annual economic impact of:
  - £340,000 GVA and 4 jobs in Argyll and Bute; and
  - £1.0 million GVA and 10 jobs across Scotland.
- The Proposed Development will also contribute to public finances through the payment of non-domestic rates, which could amount to £390,000 per year.
- The Proposed Development will support local economic activity and the role of onshore wind as a local employer. The Applicant is committed to engaging with local suppliers to maximise benefits from the wind farm by commissioning local contractors. All the above

would ensure a **contribution to the maximisation of the local supply chain content** and provide **opportunities for local employment**.

Community Benefits

> The Applicant has committed to a community benefit fund in line with Scottish Government guidance which can support local ambitions and needs. The level of funding proposed would make £220,000 available every year for the local communities, equivalent to £7.6 million over the lifetime of the wind farm, based on an installed generating capacity of 54 MW.

> It is understood that community benefit is not a material planning consideration, however the Applicant is committed to offering a package of community benefits.

Biodiversity Enhancement

> Significant biodiversity enhancements are proposed as set out in a revised Outline Habitat Management Plan ('OHMP') as set out in Technical Appendix 3.3 of the AI Report.

> The peatland restoration figure has increased from 40,898.79 m^2 (as reported in Chapter 6, Volume 2 of EIAR) to 53,781.31 m^2 (as reported in Chapter 3, Volume 1 of the AI Report). The reason for this increase in restoration/enhancement is because the total loss of priority peatland has been recalculated and has resulted in a decrease in the area of priority peatland loss (as described in Chapter 3, Volume 1 of the AI Report). This restoration of degraded peatland would enable good-quality, active blanket bog, wet heath and wet modified bog habitats. The aim is that this would have the effect of creating actively peat-forming blanket bog, wet heath and wet modified bog, which are able to store increased levels of water and carbon dioxide, helping with flood prevention and climate change.

4. The Planning Balance & Conclusions

4.1 The Climate Emergency & the Renewable Energy Policy Framework

4.1.1 The urgent need for onshore wind has been set out: a large increase in the deployment of this renewable energy technology is supported through numerous policy documents and by Scottish Government commitments – most recently expressed in the Onshore Wind Policy Statement ('OWPS') and in NPF4.

4.1.2 Onshore wind was already viewed and described as "vital" to the attainment of targets in 2017. This imperative has only increased since a 'climate emergency' was declared by the Scottish First Minister in April 2019. Furthermore, the drive to attain net zero emissions is legally binding at the UK and Scottish Government levels.

4.1.3 Achieving net zero is a legal requirement, and the Scottish Government has recognised, in the OWPS, that a very substantial quantity of new onshore wind is required to meet the onshore wind target requirement by 2030 – namely a minimum of 20 GW of operational capacity. Deployment of more onshore wind is described as being "*mission critical for meeting our climate targets*" in the OWPS.

4.1.4 The CCC has stated (2025) in its recent advice to the Scottish Government that the in the CCC's recommended 'balanced pathway', that the capacity of variable renewables in Scotland (including offshore and onshore wind and solar) more than triples from 15 GW in 2023 to 49 GW by 2035, increasing to 66 GW by 2045. This would provide 98% of electricity generation in Scotland in 2035 and would cater for forecast increases in electricity demand in Scotland and the rest of GB.

4.1.5 At the UK level, the Seventh Carbon Budget published in May 2025 assumes significant onshore wind growth to 2030 and to 2050. The Labour Government has accepted the advice of the CCC and has committed to a 30 GW onshore wind target for the UK as set out in the Clean Power Action Plan (2024) and also confirmed in the Onshore Wind Taskforce Strategy (2025).

4.1.6 The important benefits of the Proposed Development have been set out in the context of the current climate emergency, and they would help address the issue of climate change and very challenging net zero targets and contribute to improving security of supply.

4.2 Development Plan Appraisal

4.2.1 As set out in Chapter 1, the Planning Statement of December 2024 contained a detailed appraisal of the proposal against the provisions of NPF4 and the LDP. The policy submissions in the Planning Statement remain valid. The key NPF4 policies considered are:

- Policy 1: Tackling the climate and nature crises;
- Policy 3: Biodiversity;
- Policy 4: Natural places;
- Policy 5: Soils;
- Policy 7: Historic assets and places;
- Policy 11: Energy; and
- Policy 22: Flood risk and water management.

4.2.2 In terms of the effects of the Proposed Development, the EIA Report (2024) and the AI Report (2025) should be referred to for their detail and key points from it are summarised below.

4.3 Summary Key Points from AI Report

4.3.1 In summary the AI Report responds to matters raised by consultees and the key environmental and technical topic conclusions within it include:

Ecology

4.3.2 In terms of ecology, the AI Report addresses the post submission responses received from ABC – Biodiversity, Argyll District Salmon Fishery and the RSPB. It explains that the installation of pine marten boxes was requested by ABC and have been incorporated into the revised OHMP as set out in Technical Appendix 3.1 of the AI Report. Riparian planting was proposed and the location for this is clarified. A planning condition to undertake macroinvertebrate, fish and water quality monitoring has been agreed to. A Draft Species Protection Plan ('SPP') has been prepared for the protected mammal species recorded as present on site.

4.3.3 The proposed peatland restoration/enhancement has also been updated and the sum of direct peatland loss and the amount of mitigation required. A commitment to restore/enhance 53,781.31 m^2 (5.38 ha) of peatland habitat has been made and the OHMP has been updated to reflect this. Following the successful implementation of this mitigation, it is explained in the AI Report that no significant residual impacts are predicted from habitat loss associated with the construction of the Proposed Development. The findings of the AI chapter on this topic remain the same as those from the EIA Report, that no significant residual adverse impacts are predicted.

Ornithology

4.3.4 The AI Report addresses the post submission response received from the RSPB. With regards to comments on potential golden eagle displacement and potential increased hen harrier collision risk, it is explained that the original assessment (Chapter 7, Volume 2 of the EIA Report) is considered to be robust. Some additional information has been provided to support these conclusions. The Cumulative Impact Assessment has been updated to include potential for impacts arising from the required West Torrisdale Grid Connection, and it is concluded that no significant cumulative impacts are likely arising from this development.

Hydrology and Hydrogeology

4.3.5 It is explained in the AI Report that design of the Proposed Development has considered the potential for impacts to the water environment and the majority of infrastructure located outwith 50 m watercourse buffers. Following a request for further information by SEPA, details of the justification for encroachment of the 50 m water buffer have been provided, together with a more detailed summary of hydrological receptors at each location. In relation to the mitigation of impacts to watercourses (and particularly Torrisdale Water) it is explained in the AI Report that the implementation of standard best practice measures are suitable, and such measures would be set out in a Construction Environmental Management Plan ('CEMP') by the appointed contractor.

4.3.6 Overall, it is concluded in the AI Report that there are no changes to the findings of the original assessment. Impacts to the hydrology and hydrogeology remain negligible, with no significant adverse effects anticipated.

Geology and Soils

4.3.7 A Revised Peat Landslide Hazard Risk Assessment ('PLHRA') has been undertaken and is provided in Technical Appendix 6.2, AI Volume 3 and has been undertaken to address consultee comments.

4.3.8 Additional probing in line with current guidance has been undertaken across the Site to support the updated PLHRA. The overall conclusion regarding peat stability is that there is a negligible to low risk of peat instability over most of the main site although some areas of medium risk have been identified. For these areas, a hazard impact assessment was completed which concluded that, subject to micro-siting and the employment of appropriate mitigation measures, all these areas can be considered as an insignificant hazard. Additional mitigation measures have been identified in areas where hazards are already considered insignificant to further reduce the risk of potential hazards occurring (as detailed within Technical Appendix 6.2, AI Volume 3).

4.3.9 A Revised Outline Peat Management Plan ('OPMP') is provided in Technical Appendix 6.3, AI Volume 3 and has been undertaken to address consultee comments.

4.3.10 As a result of the additional peat probing undertaken in support of the PLHRA and OPMP, the peat excavation volumes have been updated and are presented in Annex A, Technical Appendix 6.3, AI Volume 3. The total excavated volume of peat for the Proposed Development (worst-case maximum amount of peat to be excavated) has been reduced from 95,545 m^3 to 59,685 m^3. Overall, the potential peat reuse volume is calculated at 63,879 m3 which is 4,194 m^3 greater than the total excavated 59,685 m^3.

Seascape, Landscape and Visual

4.3.11 The Seascape, Landscape and Visual aspects of the AI is addressed in the form of a number of key matters, principally comprising the updated cumulative position, impacts in relation to landscape designations and Wild Land and the matter of residential visual amenity.

4.3.12 Having reviewed the cumulative changes identified since the EIA Report was prepared, no material alterations to the cumulative effects predicted in the EIA Report are expected.

4.3.13 In keeping with the findings of the original assessment of effects on the North Arran National Scenic Area ('NSA') the updated assessment concludes that there would be no significant effects on the special qualities of the NSA and, consequently, the integrity of the NSA would not be significantly affected.

4.3.14 Given the limited number of special qualities/characteristics, and extent of the East Kintyre Area of Panoramic Quality (APQ) local landscape designation that would be adversely affected by the Proposed Development, no significant overall effect on the integrity of the APQ was predicted in the EIA Report and that remains the position.

4.3.15 In terms of residential visual amenity, it is explained that for the reasons stated in Table 4.4.2, Technical Appendix 4.4, Volume 4 of the EIA Report, none of the properties assessed is expected to experience overbearing, overwhelming, oppressive or pervasive visual effects. Consequently, the impacts experienced at these properties would not exceed the residential visual amenity threshold ('RVAT') and the previous conclusions drawn in the EIA Report remain the same.

Noise

4.3.16 It is explained in the AI Report that baseline noise data has been re-analysed to remove the potential effect of wind turbine noise relating to any of the phases of the Beinn and Tuirc Wind Farm. The derived ETSU-R-97 noise limits are generally slightly lower than those presented in the EIA Report.

4.3.17 An alternative candidate turbine model which fits the required dimensions and a power of up to 5 MW has been selected and assessed as a worst-case. The Enercon E136 EP5 4.65 MW machine results in predicted noise levels which are generally higher than the candidate turbine model used in the EIA Report.

4.3.18 The updated assessment shows that when comparing the increased predicted noise from the alternative worst case candidate turbine with the revised noise limits, there is still a large margin between predicted noise levels and derived noise limits. This does not result in any change to the predicted effects which are still considered to be not significant as the relevant noise limits are predicted to be met. The effects set out in the AI Report therefore remain unchanged compared to those in the EIA Report.

Aviation

4.3.19 It is explained in the AI Report that, on 13th February 2025, Highlands and Islands Airports Ltd ('HIAL') submitted a holding objection concerning the potential impacts of the Proposed Development on the safeguarding criteria and operation of Campbeltown Airport. HIAL has requested an Aviation Impact Feasibility Study be undertaken, including an Instrument Fight Procedures ('IFP') assessment. An IFP assessment has been commissioned and is expected to be available in early 2026 and therefore is not included in the AI Report.

Carbon Balance

4.3.20 It is explained in the AI Report that the reduction in the calculated volumes of peat impacted by the Proposed Development has resulted in a decrease in the total carbon emissions payback time for the Proposed Development.

Policy Appraisal Conclusions

4.3.21 The conclusion of the NPF4 policy appraisal, undertaken in 2024 and reported in the Planning Statement submitted with the S36 application in January 2025 was that overall, the Proposed Development as a National Development was considered to be one that would make a valuable contribution to the NPF4 Spatial Strategy and would help deliver a sustainable place. Overall, it was considered that the then proposal would accord with the relevant policies of NPF4 and with NPF4 when read as a whole. Following a review of the additional environmental information containment within AI Report, this conclusion is maintained.

4.3.22 The effects arising from the Proposed Development as updated in the AI Report are considered to be acceptable in terms of the relevant policy provisions of both NPF4 and the LDP.

4.4 The Planning Balance

4.4.1 In NPF4 there is a clear recognition that climate change must become a primary guiding principle for all plans and decisions. Significant weight is to be given to the climate emergency and the contribution of individual developments to tackling climate change.

4.4.2 The revised OWPS was published in December 2022. NPF4 came into force on 13 February 2023. Both are up to date statements of Scottish Government policy, directly applicable to determination of this planning application. Both should be afforded very considerable weight in decision-making.

4.4.3 NPF4 and the OWPS are unambiguous as regards the policy imperative to combat climate change, the crucial role of further onshore wind in doing so, and the scale and urgency of onshore wind deployment required. As described in the Applicants policy submissions:

4.4.4 The global climate emergency and the nature crisis are the foundations for the NPF4 Spatial Strategy as a whole. The twin global climate and nature crises are "*at the heart of our vision for a future Scotland*" so that "*the decisions we make today will be in the long-term interest of our country*"[6];

> NPF4 Policy 1 (Tackling the climate and nature crises) directs decision-makers to give significant weight to the global climate emergency in all decisions. This is a radical departure from the usual approach to policy and weight and clearly denotes a step change

[6] NPF4, page 2.

in planning policy response to climate change. The matter of weight is no longer left entirely to the discretion of the decision maker; and

> Both NPF4 and the OWPS are clear that further onshore wind development, of scale and utilising modern, larger turbines, has a crucial role in combatting climate change, transitioning to a net zero Scotland and ensuring security of energy supply. NPF4 Policy 11 (Energy) strongly supports proposals for all forms of renewable, low-carbon and zero emissions technologies, including onshore wind farms.

4.4.5 It is important to fully recognise both the scale and urgency of the challenge set out in these documents, and the required response from decision-makers. NPF4 is clear that significant progress must be made by 2030 requiring, as set out in the OWPS, that "*we must now go further and faster than before. We expect the next decade to see a substantial increase in demand for electricity to support net zero delivery across all sectors, including heat, transport and industrial processes*"[7].

4.4.6 As the Statement of Need for Strategic Renewable Electricity Generation and Transmission Infrastructure explains[8] "*A large and rapid increase in electricity generation from renewable sources will be essential for Scotland to meet its net zero emissions targets*."

4.4.7 The Applicant has gone to considerable lengths to ensure a satisfactory layout, design and composition for the Proposed Development. In short, appropriate design mitigation has been applied, in particular with regard to how the Applicant has responded to matters raised by consultees as explained in the AI Report. The environmental effects resulting from the proposal have been addressed through an iterative design process (i.e. 'mitigation by design') and a well-considered proposal has been established, which has acceptable effects, and it would also deliver a significant opportunity for biodiversity enhancement.

4.4.8 NPF4 and the OWPS require that the decision-maker must also identify and weigh the adverse effects of a proposed development. However, increased weight is to be given to the benefits of a proposed development in the planning balance owing to the seriousness and importance of energy policy related considerations and the contribution of the Proposed Development in meeting climate change targets.

4.4.9 It is considered that this approach is very clearly reflected and articulated in NPF4 and the OWPS (subject to Scottish Government policy now expressly stating that significant weight will be given to the global climate and nature crises and a proposed development's contribution towards meeting targets). Moreover, Section 3.6 of the OWPS states that the criteria for assessing proposals (in NPF4) have been updated "*including **stronger weight** being afforded to the contribution of the development to the climate emergency*" (emphasis added).

4.4.10 NPF4 has not altered the requirement to undertake a balancing exercise and to consider the adverse impacts of a development proposal; but the relative weight to be ascribed to the benefits of a renewable development and its residual adverse effects has changed with NPF4.

4.4.11 In this case, the proposal has a generation capacity over 50MW and is a development of national importance that will help to deliver the national Spatial Strategy set out in NPF4. The development would make a valuable contribution to help Scotland, and the UK attain net zero, security of supply and related socio-economic objectives. It is submitted that significant weight should be given to this contribution when weighing the need for the development and its identified effects within the planning balance.

[7] OWPS 2022, paragraph 1.1.2.
[8] NPF4, page 103.

4.4.12 The Proposed Development is considered to be in accordance with the relevant policies of NPF4 and the LDP.

4.4.13 The limited effects of the proposal, including how relevant effects listed in NPF4 Policy 11(e) have been addressed, is detailed in the supporting information to the application. In terms of Policy 11, in considering the identified impacts of the development significant weight must be placed on its nationally important contribution to renewable energy generation and greenhouse gas emissions reduction targets.

4.5 Overall Conclusion

4.5.1 The policy set out in NPF4 and the OWPS requires a rebalancing of the consenting of onshore wind developments in response to the challenges of tackling the climate and nature crises. Having regard to the weight to be ascribed to the nationally important benefits of the Proposed Development it is considered that the benefits of the proposal clearly outweigh its adverse effects.

4.5.2 The up-to-date policy set out in NPF4 and the OWPS and the policy being consulted upon in the draft Energy Strategy and Just Transition Plan, together with the various energy policy related documents referred to in this Planning Statement Update provide strong and increased support for the grant of consent for the proposal.

4.5.3 The overall conclusion is that the Proposed Development would be in accordance with all relevant policies of NPF4, and with the Development Plan when read as a whole insofar as that is a relevant matter in a Section 36 application.

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