DAVID BELL PLANNING
CHARTERED TOWN PLANNERS

Appin Wind Farm
Section 36 Application:

Planning Statement Update re Grid Connection Appraisal

June 2026

Statkraft

dbplanning.co.uk

Contents

1. Introduction

1.1 Background & Scope

1.1.1 This Planning Statement Update has been prepared by David Bell Planning Ltd ('DBP') on behalf of Appin Wind Farm Ltd (the Applicant) in support of an application to construct and operate a 9-turbine wind farm (with associated infrastructure) known as Appin Wind Farm (hereafter referred to as 'the Proposed Development') located 6.2 km north of Moniaive and 14.8 km east of Carsphairn, within in the Dumfries and Galloway Council ('the Council' or 'DGC') 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 the Proposed Development was submitted under section 36 of the 1989 Act to the Scottish Government's Energy Consents Unit ('ECU') in May 2025 and was accompanied by an Environmental Impact Assessment (EIA) Report.

1.1.4 In April 2026 the ECU requested further information in respect of the recent judgment: *Raeshaw Farms Limited v Scottish Ministers and Energiekontor UK Ltd* [2026] CSIH 10[1] ('Raeshaw Farms') and how it relates to the Proposed Development.

1.1.5 As detailed in the EIA Report, the Proposed Development is expected to connect to the national electricity network (the 'grid') at the existing Glenglass Substation via the proposed Rowancraig Collector, both located south-west of Sanquhar, approximately 8 km and 10.3 km respectively, to the north-east of the closest turbine of the Proposed Development. The grid connection will be subject to a separate application for consent by ScottishPower Transmission ('SPT'), under Section 37 of the Electricity Act 1989. At the time of writing the EIA Report, the route options for the grid connection and the timing of the S.37 application were not known and therefore potential environmental effects associated with the grid connection were not considered within the EIA Report.

1.1.6 The Applicant acknowledges that a grid connection will be required from the Proposed Development to connect it to the national grid. Giving consideration to the '*Wingfield factors*[2]' and taking a precautionary approach, the Applicant considers that the wind farm and the grid connection could be considered to comprise one EIA project. Given that grid connection works were not considered in the suite of submitted Appin Wind Farm EIA material, further environmental assessment material is required to include such works.

1.1.7 The Applicant has prepared a 'Grid Connection Appraisal' on a likely grid connection route as Additional Information ('AI'). The AI seeks to address the potential for significant effects of the grid connection and the 'combined projects' (i.e. the Proposed Development and its grid connection) as far as possible given the information currently available.

1.1.8 The AI therefore presents an assessment prepared on a precautionary basis. Firstly, on the basis that it assumes that both the Proposed Development and the cable route to the grid connection point comprise a single EIA project, in the absence of a position from the Scottish Ministers as to whether they consider these to be a single EIA project or two. Secondly, in that it considers the entirety of the defined EIA project on that basis and "*at the earliest possible stage in all the technical planning and decision-making processes*", as rehearsed as a requirement by reference to EU Directive 2011/92/EU in Raeshaw Farms.

[1] Raeshaw Farms Ltd v Scottish Ministers and Energiekontor UK Ltd, 17th February 2026.
[2] The Wingfield factors, namely: Common ownership, Simultaneous Determinations, Functional Interdependence and Stand-alone projects.

1.1.9 As explained in the Grid Connection Appraisal, until the Proposed Development receives a Gate 2 Offer, the connection date, connection point and route connecting the Proposed Development to the grid network will not be known. Through the current grid reform process, the TOs and National Energy System Operator ('NESO') are restudying and optimising how the projects that remain in the refined queue will connect to the transmission network. As a result, the points of connection, and the grid route, for many projects are subject to change until such time as formal grid offers are issued. As noted, at this stage, it is anticipated that the Proposed Development will connect into the existing Glenglass Substation via the Rowancraig Collector. However, there remains a degree of uncertainty in how the Proposed Development would connect to the electricity grid as a result of the grid reform process.

1.1.10 It will be the Transmission Operator's ('TO') responsibility to design, consent, build and operate the grid connection from the wind farm to the transmission substation. For the avoidance of doubt, the Applicant is not seeking consent for the grid connection, which will be subject to a separate application for consent, and environmental survey and assessment as appropriate, by SPT in due course.

1.2 The Grid Connection: Approach & Summary Description

1.2.1 Th Grid Connection Appraisal covers the following:

- An overview of the grid route and connection point, and how the grid route has been identified.
- The Environmental Appraisal methodology.
- The Environmental Appraisal, including consideration of: landscape and visual amenity; ecology and ornithology; cultural heritage; hydrology, hydrogeology and peat; traffic and transport; and noise.
- A brief overview of cumulative effects of the grid route with other projects.

1.2.2 The grid connection route has been identified on the basis of professional judgement, having regard to the locations of connection points within a reasonable distance of the wind farm and with appropriate capacity, and considering Scottish Power Energy Networks ('SPEN's') Approach to Routeing and Environmental Impact Assessment (2020). It is also based on knowledge of the industry-standard approach to routing, and construction methodologies. At this stage, given the known constraints between the Proposed Development and the potential grid connection point at Glenglass, via Rowancraig, it is expected that this would be comprised entirely of underground cable ('UGC').

1.2.3 Due to the proximity of a number of operational and consented wind farms in the area, it is anticipated that the entire length of the grid connection (approximately 25 km) would be undergrounded due to the requirement to maintain a separation distance between overhead lines ('OHLs') and operational wind turbines for health and safety reasons.

1.2.4 It is explained in the Grid Connection Appraisal that typically, a UGC would be accommodated in a trench approximately 1.25 m deep and 1 m wide, although the trench may be wider where stability and safety concerns would arise. The appraisal notes that the grid connection route may require the use of horizontal directional drilling ('HDD') where the route intersects with the Euchan Water which is 10 m wide at the proposed point of crossing.

1.3 Scope of this Planning Statement Update

1.3.1 The purpose of this Planning Statement Update is therefore to examine the grid connection corridor alongside the Proposed Development, and to review the conclusions reached in the overall planning balance, taking account of the findings of the Grid Connection Appraisal.

1.3.2 The Planning Statement Update has considered whether the introduction of the grid connection and its likely environmental effects would alter the planning balance and overall conclusions to be reached in respect of the Section 36 application for the Proposed Development. This Planning Statement Update should be read alongside the previously submitted Planning Statement document and it is structured as follows:

- **Chapter 2** provides an update to the renewable energy legislative and policy framework. The original Planning Statement addressed this topic, however there are a number of matters to update since it was produced in May 2025.
- **Chapter 3** considers the likely potential environmental effects of the grid connection and whether the conclusions reached in the appraisal would alter the planning balance and overall conclusion reached in the Applicant's Planning Statement (May 2025). Updated conclusions on the overall accordance of the Proposed Development with the Development Plan and material considerations are set out.

2. The Renewable Energy Legislative & Policy Framework: Update

2.1 Introduction

2.1.1 The Planning Statement (May 2025) that was submitted with the Section 36 application addressed the renewable energy policy and legislative framework. This Planning Statement Update provides an update on that policy framework, with an emphasis on new policy and legislative provisions which have emerged since May 2025. Relevant updates are:

2.1.2 At the UK level –

- The Onshore Wind Taskforce Strategy (July 2005);
- The Energy Secretary's Statement on Energy Security (2026).

2.1.3 At the Scottish Government level:

- Climate Change Committee ('CCC') Report, Scotland's Carbon Budgets, Advice for the Scottish Government (May 2005);
- The (Scottish Carbon Budgets) Amendment Regulations 2025 (October 2025);
- Climate Change Committee Report to Scottish Parliament - Progress in reducing emissions in Scotland (February 2026); and
- The Climate Change Plan (2026).

2.2 UK Level Update

The Onshore Wind Taskforce Strategy (July 2025)

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

2.2.2 The Ministerial Foreword 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."

2.2.3 In addition, within the foreword the statement by the Head of Clean Power 2030 within DESNZ states (page 5) *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."

2.2.4 As noted above, whilst 2030 is a key target date but a milestone en route to attaining net zero, generation capacity figures are not caps and there will still be a requirement for new generation capacity post 2030. A connection date post 2030 should not diminish the weight to be afforded to the benefits of the Proposed Development.

2.2.5 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.

2.2.6 The OWTS 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:

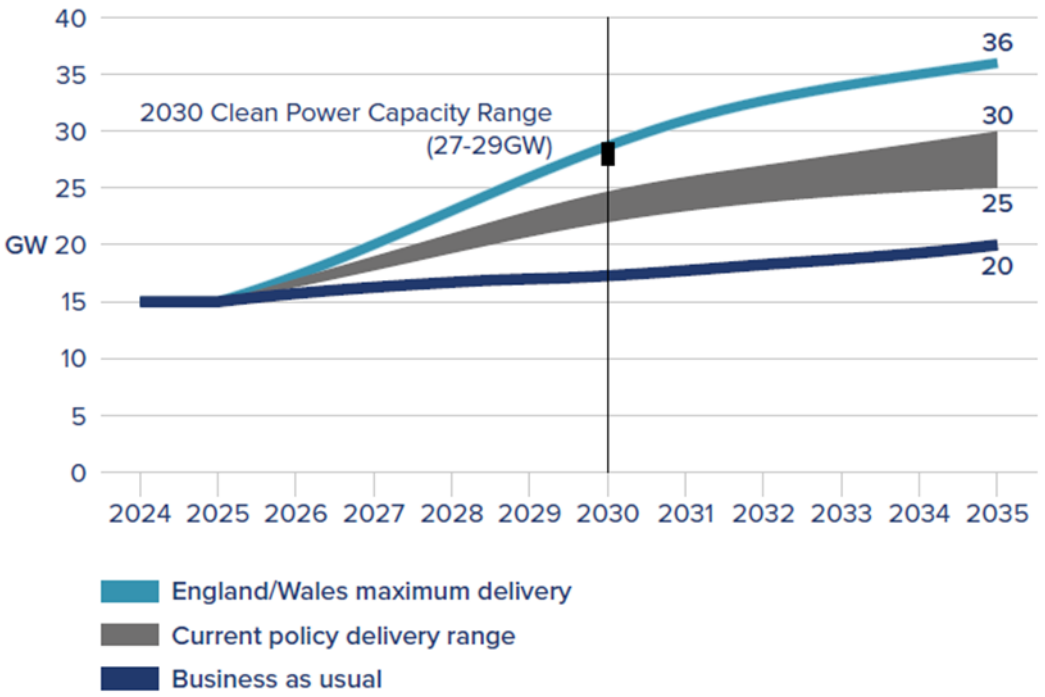
"All routes to achieving this mission are reliant on mass deployment of renewable electricity technologies, including onshore wind. The Clean Power Plan stated that to decarbonise the power sector by 2030, 27 to 29GW onshore wind will be needed within GB . That is a significant increase above the current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

2.2.7 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.

2.2.8 The OWTS also emphasises the significant economic opportunity that further onshore wind deployment will deliver (pages 10 and 11). 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.

2.2.9 At page 18 of the OWTS, 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 2.1** below (reproduction of Figure 5 from the OWTS).

Figure 2.1: Clean Power Deployment Scenarios (Onshore Wind)



2.2.10 The scenarios as illustrated in **Figure 2.1** 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 "seamless implementation" of the reform announced as part of the Clean Power 2030 Action Plan and the actions set out in the Onshore Wind Taskforce Strategy. In this scenario up to 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.

2.2.11 The OWTS addresses implementation and states (page 71) that the Government is committed to delivering the level of onshore wind needed by 2030.

Government Statement on Energy Security (March 2026)

2.2.12 The Energy Secretary (The Right Hon Ed Miliband MP) issued a statement on 15 March 2026 outlining a package of measures to go "further and faster" in the pursuit of national energy security, as a response to events in the Middle East. The Energy Secretary announced various energy interventions to boost the UK's energy security, including relating to solar deployment and stated an intention to bring forward the Government's next annual renewables option to July 2026. The Energy Secretary stated:

"*Global events demonstrate there is not a moment to waste in our drive for clean power because there can be no energy security while we are so dependent on fossil fuels… everything we are doing is about one purpose: fighting the corner of the British people by taking back control of our energy*".

2.3 Scotland Level Update

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

2.3.1 This CCC Report sets out the CCC's advice on the level of Scotland's four proposed carbon budgets, covering the period 2026 to 2045. It recommended that the Scottish Government set carbon budgets.

2.3.2 The report states (page 9) 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.

2.3.3 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."

2.3.4 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 electric vehicles ('EVs') and heat pumps.

2.3.5 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.

2.3.6 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 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)

2.3.7 Scotland currently has approximately 17.8 GW[3] of renewables operating capacity. Therefore, to achieve the Balanced Pathway figure of 66 GW by 2045 will require an approximate additional 48.2 GW to be deployed. This would equate to approximately 2.4 GW of operating capacity coming online each year over the next 20 years.

2.3.8 Following the CCC's recommendations, **the Climate Change (Scotland) Act 2009 (Scottish Carbon Budgets) Amendment Regulations 2025 ('2025 Regulations')** came into force on 10th October 2025. These Regulations reinforce the Scottish Government's commitment to achieving the climate targets. The 2025 Regulations amend the 2009 Act to include the Scottish carbon budgets for the five-year periods to 2045 and align with the recommendations of the CCC in their May 2025 Report as referenced.

[3] Scottish Government (December 2025) Energy Statistics for Scotland – Q3 2025.

Climate Report to Scottish Parliament - Progress in reducing emissions in Scotland (February 2026)

2.3.9 The CCC produced a report to the Scottish Parliament entitled 'Progress in reducing emissions in Scotland'4 in February 2026 ('CCC 2026 Report'). The CCC 2026 Report acknowledges the progress made stating that "*the Scottish Government and Scottish Parliament have made rapid progress in legislating the levels of the four carbon budgets, covering the period 2026 to 2045*." This was secured through the 2025 Regulations.

2.3.10 In relation to energy supply the CCC 2026 Report states that (page 20):

"deployment of variable renewable electricity generation is continuing to increase in Scotland, with 1.1 GW of offshore and 1.3 GW of onshore wind capacity deployed in 2024. Remaining emissions in electricity generation come predominantly from the Peterhead gas-fired power station. Reducing emissions further relies on the continued roll-out of wind and solar generation and of network capacity to accommodate it."

2.3.11 The CCC 2026 Report states that *"Scotland will need to continue its strong progress in rolling out renewable electricity generation and ensure development of electricity networks can keep pace. The Scottish Government should act to accelerate planning and consenting for transmission infrastructure to achieve this."* (Page 22)

2.3.12 At Page 77 this is discussed in further detail, and it notes that "*To achieve the Scottish Government's target of 20 GW of onshore wind by 2030, nearly 10 GW needs to be installed in the next five years, which would be a doubling of capacity. This equates to a rate of deployment approximately two and a half times higher than the average annual deployment in 2023 and 2024*."

2.3.13 The CCC 2026 Report acknowledges the progress in emission reductions relating to the energy supply noting that *"around two-thirds of the emissions reductions seen since the introduction of the Act in 2009 have been in the energy supply sector. Electricity supply in Scotland is now almost fully decarbonised".* (Page 58)

2.3.14 However, it goes on to state that *"further expanding low-carbon generation and supporting transmission network infrastructure in Scotland remains critical to enable decarbonisation of other sectors and to supply low-carbon electricity to the rest of the UK."* (Page 58)

2.3.15 The CCC call on the Scottish Government to enable *"rapid expansion of renewable energy and ensure timely planning approval of the transmission infrastructure required to move power from generation sites to where it will be used".* (Page 108)

2.3.16 As part of the priority recommendations the CCC note that *"constraints on the transmission network mean that a significant proportion of Scotland's renewable electricity cannot be exported and is curtailed."* (Page 123)

2.3.17 The CCC 2026 Report identified positive progress over the last year in securing emissions reduction but identifies more to do, including continued deployment of renewable energy infrastructure and the acceleration of the transmission infrastructure needed to support the attainment of net zero by 2045.

Scotland's Climate Change Plan (2026)

2.3.18 The Scottish Government published 'Scotland's Climate Change Plan – 2026-2040' ('CCP') on 25 March 2026. The CCP covers the period 2026 to 2040 and aligns with three five-year "carbon budget" periods over this timescale.

2.3.19 The CCP sets out the policies and proposals the Scottish Government will take forward to enable the carbon budgets set out in legislation to be met. The carbon budgets have been set in line with the levels proposed by the CCC in May 2025, referred to above, and provide a clear pathway towards Scotland achieving net zero by 2045.

[4] CCC (2026) Progress in reducing emissions in Scotland.

2.3.20 The carbon budgets are that emissions be:

- 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).
- 94% lower than 1990 levels for the Fourth Carbon Budget (2041 to 2045).

2.3.21 The CCP confirms that Scotland remains committed to achieving net zero greenhouse gas emissions by 2045 at the latest.

2.3.22 The CCP notes that the key driver of the transition to date has been the transformation in the way energy is generated - from coal and gas to a thriving renewables sector. It acknowledges the opportunity the transition to net zero provides in terms of growing the economy, noting that the net zero transition can support significant economic opportunities for Scotland.

2.3.23 The CCP sets out sectoral policies relating to a range of sectors, which are prescribed in legislation, including energy supply, agriculture and transport, amongst others. Key policies and actions have been set out for each sector to meet the carbon budgets.

2.3.24 Annex 2 of the CCP contains the Sectoral Annexes which support the CCP. Energy supply is one of the key areas of focus. At page 84, the document sets out the vision for Scotland stating that:

"By 2035, we will have expanded our renewable capacity significantly to meet the increasing demand as other sectors decarbonise. We already have an ambition to have delivered 20GW of onshore wind by 2030 and in January 2026, we published the 'Offshore Wind Policy Statement 2020 update: Scotland's Offshore Wind Ambition'. This set out an increased offshore wind ambition for Scotland of up to 40GW of new offshore wind capacity by 2040."

2.3.25 It adds that as we transition to net zero and reduce reliance on fossil fuel generation *"energy storage will play a larger role in ensuring a secure and resilient electricity system by providing a reliable and flexible electricity supply."* (page 84, Annex 2)

2.3.26 One of the actions identified to achieve the emissions reduction for the energy generation sector means *"moving to an electricity system in which the residual amount of unabated gas is displaced by low carbon and renewable sources. To deliver this target, whilst ensuring a safe and secure supply, **we must grow our renewables capacity**, including from offshore and **onshore wind**, and solar."* (Page 89, Annex 2) (emphasis added).

2.3.27 The publication of the CCP demonstrates the continued commitment, needs case for and urgency to delivering additional renewable energy capacity.

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. 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.

2.4.2 It is clear from the forecasts by the CCC that electricity demand is expected to grow substantially (scenarios vary but potentially by a factor of three or four) as carbon intensive sources of energy are displaced by electrification of other industry sectors, particularly heat and transport. This expected substantial increase in electricity demand is also highlighted in the Onshore Wind Policy Statement (2022).

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 by 2045, and it strengthens the case for rapidly approving schemes that can contribute to this goal. The overall target of net zero remains unchanged in the move to carbon budgets.

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 It must follow that the need case for the Proposed Development is to be afforded substantial weight in the planning balance. The way that decision makers can do that is by properly recognising the seriousness and importance of energy policy and energy security related considerations in the planning balance, and the contribution of the Proposed Development to meeting net zero and low carbon energy targets. 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. Conclusions & The Planning Balance

3.1 Summary of Key Findings of the Grid Assessment

3.1.1 The Grid Connection Appraisal provides an overview of the indicative grid connection type, an indicative route and the likelihood for it to give rise to any significant environmental effects, alone or in-combination with the Proposed Development. The assessment is restricted to an early and high-level appraisal and baseline data limitations are recognised.

3.1.2 The Appraisal includes consideration of: landscape and visual amenity; ecology and ornithology; cultural heritage; hydrology, hydrogeology and peat; traffic and transport and noise matters.

3.1.3 The indicative grid connection would comprise entirely of an underground cable ('UGC'), largely following existing forestry tracks, wind farm tracks, and an access track to Glenglass Substation via the proposed Rowancraig Collector.

3.1.4 The appraisal explains that there would be temporary disturbance to the landscape during construction of the indicative grid connection. Given the limited footprint of construction works associated with an UGC and the temporary nature of construction effects, the scale of landscape change and the geographical extent of landscape change would be small, experienced for a short duration of time (short-term). Overall, the construction of the indicative grid connection would result in a low magnitude of landscape change. Therefore, significant landscape effects during construction are considered unlikely to arise.

3.1.5 Once operational, the indicative grid connection would be restored and would not be a discernible feature in the landscape. Therefore, significant effects on landscape character during operation are not anticipated.

3.1.6 In addition, no significant effects are predicted in relation to the other environmental topics addressed.

3.1.7 Overall, the Appraisal concludes that based on the information available at this preliminary stage, it is not considered that the construction and operation of the indicative grid connection route will result in significant short-term (during construction) or long-term (during operation) environmental effects if the final grid connection route follows careful routeing and design, as well as the implementation of standard good practice and mitigation measures.

3.2 Development Plan Policy Considerations

3.2.1 The Planning Statement documentation submitted with the Section 36 application provided a detailed assessment of the Proposed Development against the relevant planning policy, namely the statutory Development Plan, made up of National Planning Framework 4 ('NPF4') (2023) and the Dumfries and Galloway Local Development Plan (2019) ('LDP') and associated Supplementary Guidance.

3.2.2 As previously noted, the grid connection application will be subject to a separate consenting process under the relevant legislation at a later date. Nevertheless, the Development Plan will be a relevant consideration in the determination of that application, alongside other matters.

3.2.3 The lead Development Plan policy for the consideration of any future application for the grid connection would be NPF4 Policy 11 (Energy). Additional policies which may be relevant include the following NPF4 policies:

> Policy 1: Tackling the Climate and Nature Crises;

> Policy 3: Biodiversity;

- Policy 4: Natural Places;
- Policy 5: Soils;
- Policy 6: Forestry, Woodland and Trees;
- Policy 7: Historic Assets and Places; and
- Policy 22: Flood Risk and Water Management

3.2.4 From a review of the key findings of the Grid Connection Appraisal, it is considered that there are likely to be no significant effects arising from the grid connection in combination with the Proposed Development, or cumulatively with other developments that would give rise to a policy conflict with Policy 11, or indeed the other policies of potential relevance to the grid connection.

3.2.5 The Proposed Development has also been considered in terms of accordance with the relevant policies of the LDP and its Supplementary Guidance. Again, given the outcome of the Grid Connection Appraisal, there are considered to be no impacts predicted which are likely to give rise to a conflict with any policy of the LDP.

3.3 Updated Planning Balance

3.3.1 This Planning Statement Update is intended to assist the decision maker in the consideration of the Proposed Development. It should be read alongside the submitted Planning Statement (May 2025).

3.3.2 The Applicant has prepared a Grid Connection Appraisal by way of Additional Information to set out the potential likely environmental effects associated with the grid connection route identified at this stage.

3.3.3 As such, based on the information before Scottish Ministers, they are in a position to conclude what likely effects – or disbenefits – would arise from the associated grid connection and weigh those against the considerable benefits of the Proposed Development (acknowledging these will only be realised if consent is obtained for the associated grid connection) and supportive planning policy, as set out within the Planning Statement documentation. On that basis, Scottish Ministers can properly undertake the exercise of weighing the benefits and disbenefits in the planning balance.

3.3.4 Consideration of the environmental effects of the grid connection, assessed in combination with the effects of the proposed wind farm, is a relevant consideration in the determination of the Section 36 application for the Proposed Development. Both projects together must be delivered in order to realise the benefits.

3.3.5 However, it is reasonable to conclude, based on the information that has been made available, that appropriate mitigation will be secured where adverse environmental effects have been identified.

3.3.6 NPF4 requires that the decision-maker must identify and weigh the adverse effects of a proposed development. However, increased weight is to be given to the benefits of a development in the planning balance owing to the seriousness and importance of energy policy related considerations and the contribution of the Proposed Development to meeting climate change targets – as required by NPF4 Policy 11 (Energy) and Policy 1 (Tackling the climate and nature crises).

3.3.7 These benefits are balanced with the identified adverse effects of the Proposed Development (and associated grid connection) in the overall planning balance in considering whether Section 36 consent for the Proposed Development should be granted.

3.4 Overall Conclusion

3.4.1 It is considered that the conclusions as set out in Planning Statement are not changed as a result of the updated considerations set out within this Planning Statement Update. As such:

> The Proposed Development delivers important renewable energy capacity to meet national renewable energy and emission reduction and renewable energy generation targets and would contribute to the attainment of net zero for Scotland by 2045 and the UK by 2050.

> The Proposed Development is in accordance with the relevant policies of the Development Plan and with the plan when read as a whole.

> Other relevant considerations, including the energy policy related updates provided in this report, further support the position that the Proposed Development should be granted Section 36 consent.

3.4.2 The conclusion is that the Proposed Development would be consistent with all relevant national planning and energy policies comprising the statutory Development Plan. While there is no statutory duty on the Applicant at the present time under Part 3 of Schedule 9 of the Electricity Act 1989, the Applicant has through the EIA process, had full regard to the matters set out therein.

Contact

David Bell Planning Ltd
26 Alva Street
Edinburgh
EH2 4PY

dbplanning.co.uk