



# **Holm Hill Substation**

**Environmental Appraisal**

**Planning Statement**

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## PLANNING STATEMENT

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## 1 INTRODUCTION

### 1.1 Background

- 1.1.1 WSP has been appointed by Scottish Power Transmission, a subsidiary of SP Energy Networks (hereafter referred to as 'The Applicant'), to prepare a Planning Statement to support a major planning application to Dumfries & Galloway Council. The Applicant owns, operates, and develops the high voltage electricity transmission system in the south of Scotland. They also hold a licence under Section 9 of the Electricity Act 1989<sup>1</sup> to 'develop and maintain an efficient, co-ordinated and economical electricity transmission system in its licensed area'.
- 1.1.2 In order to meet the terms of its licence, The Applicant is proposing to construct a new 132 kV electricity substation at Holm Hill to the north-west of Carsphairn, Dumfries and Galloway. The proposals comprise a substation platform, electrical infrastructure and buildings, associated plant, ancillary infrastructure, a temporary site compound, an access road and landscape planting (collectively referred to as the 'Proposed Development').

### 1.2 Purpose of this Statement

- 1.2.1 This Statement supports a planning application for the Proposed Development to construct a new 132 kV electrical substation at Holm Hill.
- 1.2.2 The purpose of this Statement is to provide an assessment of the Proposed Development against relevant national and local planning policy. This statement sets out how the siting and design of the substation and associated infrastructure have been fully considered to ensure that environmental and planning policy factors have been addressed.

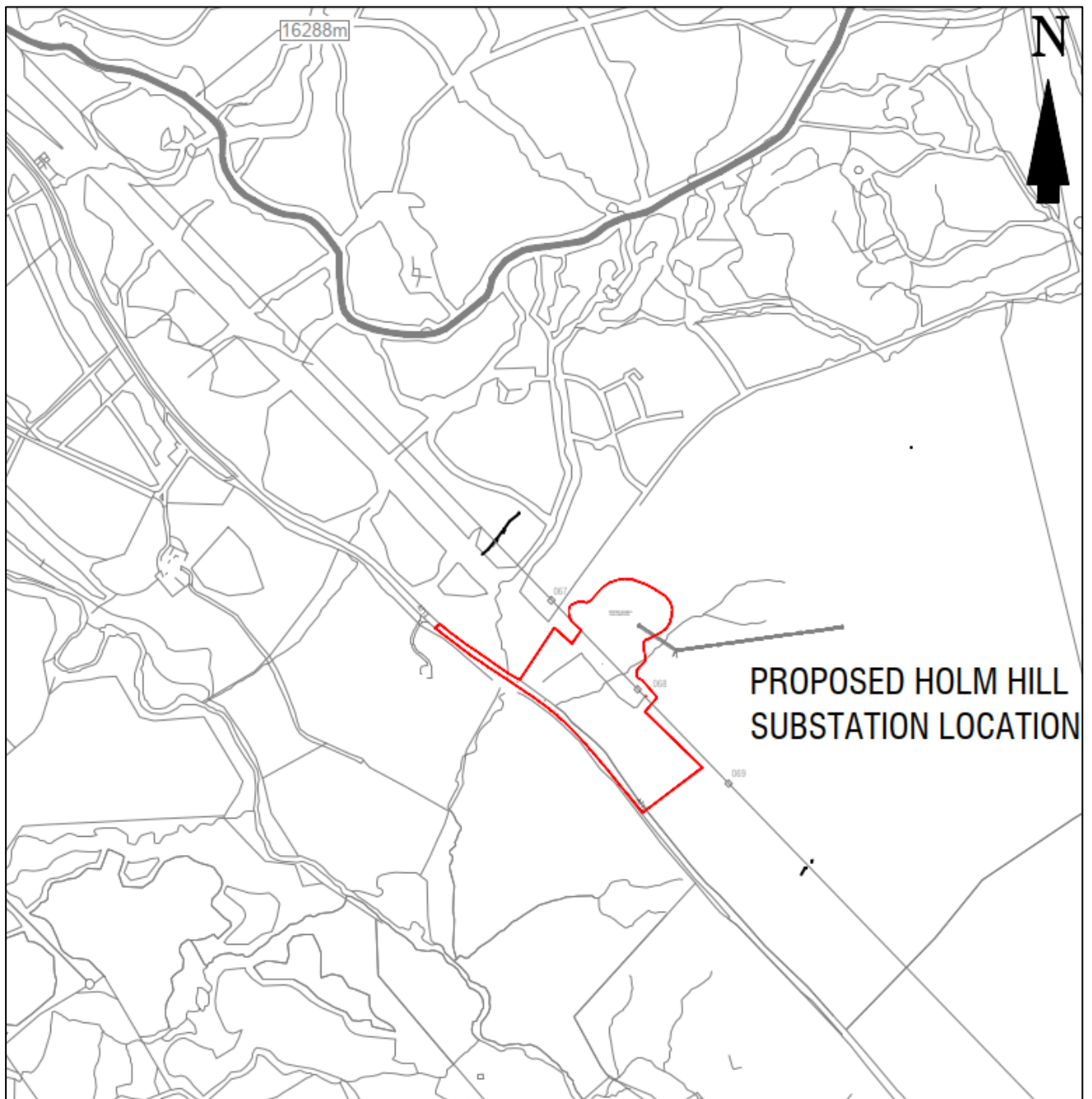
### 1.3 Proposed Development

- 1.3.1 The Applicant has a legal duty under the Electricity Act 1989<sup>1</sup> to provide grid connections to new electricity generating developments. The Holm Hill substation is essential for connecting local wind farms to the existing electricity transmission network. Two 132kV wind farm connections would come into Holm Hill substation, the Lorg wind farm connection (including Eucharhead and Shepherd's Rig teed to the line) and Quantans Hill wind farm connection (including Wether Hill and Cornharrow connected to the collector at Quantans Hill). The proposed Holm Hill Substation would connect these wind farms to the existing DE Route.
- 1.3.2 The Proposed Development would be located at National Grid Reference NX 54607 95825, approximately 3.5 kilometres (km) to the north-west of Carsphairn and 7.5 km south-east of Dalmellington, as illustrated in **Plate 1.1** below.
- 1.3.3 The Site is located in a rural area that comprises predominantly open moorland and rough grazing with areas of plantation forestry/woodland grassland to the north-west of The Site boundary. Being located on the south-western slope of Holm Hill, The Site slopes downwards toward the A713 between elevations 242 m and 220 m Above Ordnance Datum (AOD).
- 1.3.4 The Proposed Development would be accessed via the A713 (Ayr to Castle Douglas). The A713 is the main route through the Glenkens and is promoted as the Galloway Tourist Route. The Proposed Development is also immediately adjacent to the DE Route electricity transmission network, which it would connect to via underground cabling to the existing OHL tower (Tower 68).

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<sup>1</sup> UK Government (1989). Electricity Act 1989. Available at: <https://www.legislation.gov.uk/ukpga/1989/29/contents>

**Plate 1.1 – Holm Hill Substation - Proposed Site Location**



1.3.5 The key elements of the Proposed Development include:

- a 132 kV substation platform (including a control building, earth switch, disconnectors, CVT, and four car parking spaces);
- Sealing End Compound;
- emergency back-up generator;
- ancillary works (lighting, Closed-Circuit Television (CCTV), security fencing);
- a proposed access route and bellmouth junction to the A713;

- an area for landscape planting;
  - SuDs, including two ponds, two culverts and a soakaway; and Stone access roads.
- 1.3.6 As shown on the planning application drawings, the substation electrical infrastructure and buildings would be located on a platform within an area approximately 67 m by 56 m. The platform would accommodate a control building approximately 3.8 m in height, electrical infrastructure, generator and car parking. There would also be a nearby platform with a sealing end compound. Security/palisade fencing would surround the perimeter of the platform areas.
- 1.3.7 To the west of the substation platform, within the Red Line Boundary of the Proposed Development, there is an area proposed for Sustainable Drainage Systems (SuDS), including a pond.
- 1.3.8 Access to the new substation would be from the existing A713. Works would include the creation of a permanent access track and bellmouth off the A713. Other ancillary infrastructure includes security fencing, CCTV and lighting. Lighting columns would be no higher than 6 metres and would not be permanently on. Lighting columns may be switched on during maintenance periods or where required to facilitate safe working conditions. They can be switched on/off remotely or within the compound control building.
- 1.3.9 Landscape planting has been included between the A713 and the proposed substation platform, to screen the substation from the view of local residents and tourists who use the A713 and the surrounding area for walking and cycling and to blend the substation more naturally into the landscape.
- 1.3.10 Construction elements associated with the Proposed Development are as follows:
- establishment of the temporary construction compound located between the proposed bellmouth and the substation on the eastern side of the proposed access road;
  - temporary construction access track;
  - establishment of suitable laydown areas for materials;
  - ground works (including any temporary drainage requirements) to achieve a level area at The Site;
  - delivery of components and materials to Site;
  - construction of the substation, and associated compounds;
  - construction of a control building;
  - remedial works to reinstate the immediate vicinity, and any ground disturbed to pre-existing condition;
  - landscaping planting; and
  - inspections and commissioning.
- 1.3.11 While the temporary construction elements and underground cabling associated with the Proposed Development have been included within the Red Line Boundary to allow for comprehensive environmental assessment, these would fall under Class 14 and Class 40 of the General Permitted Development (Scotland) Order 1992<sup>2</sup> respectively and therefore do not require planning permission. As such, only the permanent elements of the Proposed Development would be assessed further in this Planning Statement.
- 1.3.12 It is anticipated that construction of the substation would take approximately 12 – 18 months, following the granting of consents, although detailed programming of the works would be the responsibility of the Principal Contractor in agreement with The Applicant.

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<sup>2</sup> UK Government (1992). The Town and Country Planning (General Permitted Development) (Scotland) Order 1992. Available at: <https://www.legislation.gov.uk/uksi/1992/223/contents/made>

## 1.4 Need for Development

- 1.4.1 The Proposed Development is necessary to fulfil The Applicant's statutory and licence obligations as an onshore transmission licence holder under the Electricity Act 1989<sup>1</sup>. These obligations require the development of the electricity transmission network to provide adequate transmission capacity, and maintain an efficient and coordinated transmission system.
- 1.4.2 The Applicant also has obligations to offer non-discriminatory terms for connection to the electricity transmission system, and as such has a legal duty to provide connections for new electricity generators wishing to connect to the transmission network in its licence area.
- 1.4.3 The need for a high voltage electricity transmission network is also identified within the current National Planning Framework 4 (NPF4)<sup>3</sup>. NPF4 was approved by the Scottish Parliament on 11 January 2023 and adopted on 13 February 2023. This framework is the long-term strategy for Scotland and is the spatial expression of the Government's Economic Strategy and plans for development and investment in infrastructure.

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<sup>3</sup>Scottish Government (2023). National Planning Framework 4. Available at: <https://www.gov.scot/publications/national-planning-framework-4/documents/>

## 2 PLANNING POLICY ASSESSMENT

### 2.1 Policy Introduction

- 2.1.1 This section considers national and local planning and energy policy, alongside relevant supplementary guidance to provide a brief assessment of the Proposed Development. Relevant National Planning Policy contained within NPF4 is identified in **Section 2.3**, and local planning policies as identified in the Dumfries & Galloway Local Development Plan 2 (LDP2)<sup>4</sup> are identified in **Section 2.4** below.
- 2.1.2 NPF4 is a significant material consideration when determining the planning application for the Proposed Development, as the NPF4 now forms part of the statutory development plan. Section 13 of The Planning (Scotland) Act 2019<sup>5</sup> amends Section 24 of the 1997 Act regarding the meaning of the statutory ‘development plan’, such that for the purposes of the 1997 Act, the Development Plan for an area is taken as consisting of the provisions of:
- The National Planning Framework; and
  - Any Local Development Plan (LDP).
- 2.1.3 In addition, Section 13 of the 2019 Act provides that:
- “In the event of any incompatibility between a provision of the National Planning Framework and a provision of a local development plan, whichever of them is the later in date is to prevail.”*
- 2.1.4 As such, where NPF4 and the LDP differ, the latter of the two documents adopted will have greater weight. The NPF4 adopted in 2023 will hold greater weight in the event of policy conflict, as this represents the latest adopted policy position.
- 2.1.5 Under Section 25 of the Town and Country Planning (Scotland) Act 1997<sup>6</sup>, the determination must be made in accordance with the development plan unless material considerations indicate otherwise.

### 2.2 National Energy Policy

- 2.2.1 The UK and Scottish Government’s renewable energy and climate change policies make it clear that there is an urgent need for new and upgraded electricity transmission infrastructure to enable an increase in renewable energy generation. This aim is also supported through national planning and energy policy documents, which are important material considerations to the determination of the current application. The following section outlines these policy documents, first examining UK-wide items before focusing on Scottish-specific policy.

#### UK Energy Policy and Legislation

*The Climate Change Act 2008<sup>7</sup> and the Climate Change Committee’s carbon budgets<sup>8</sup> (2008)*

- 2.2.2 The Climate Change Act 2008 set a legally binding target for the UK to reduce greenhouse gas emissions by 80% from 1990 levels by 2050. This was later strengthened to a net zero target by 2050, with a system of carbon budgets introduced to track progress and ensure accountability along the way. The Climate Change Committee has released seven Carbon Budgets, which provides a road map to ensure that UK meets its long-term climate targets. The seven Carbon Budgets creates a road map between 2008-2042, with the first – third Carbon Budgets covering 2008-2022.

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<sup>4</sup> Dumfries & Galloway Council (2019). Dumfries & Galloway Council Local Development Plan 2. Available at: <https://www.dumgal.gov.uk/ldp2>

<sup>5</sup> Scottish Government (2019). Planning (Scotland) Act 2019. Available at: <https://www.legislation.gov.uk/asp/2019/13/contents>

<sup>6</sup> UK Government (1997). Town and Country Planning (Scotland) Act 1997. Available at: <https://www.legislation.gov.uk/ukpga/1997/8/contents>

<sup>7</sup> Climate Change Act 2008, c.27. Available online at: <https://www.legislation.gov.uk/ukpga/2008/27/contents> [Accessed: October 2025]

<sup>8</sup> Committee on Climate Change (2008) *Building a low-carbon economy – the UK’s contribution to tackling climate change*. London: The Stationery Office. Available online at: <https://www.theccc.org.uk/publication/building-a-low-carbon-economy-the-uks-contribution-to-tackling-climate-change-2/> [Accessed: October 2025]

- 2.2.3 The Climate Change Committee's Fourth Carbon Budget<sup>9</sup> was released in November 2013 and covers 2023 to 2027, and was later reviewed in December 2013<sup>10</sup>. The Fourth Carbon Budget places strong emphasis on renewable energy and energy transmission as key enablers of the transition to net zero. The Fourth Carbon Budget also highlights the importance of investing in grid infrastructure and storage capacity to integrate the higher share of renewables on the system.
- 2.2.4 In November 2015, the Climate Change Committee's Fifth Carbon Budget<sup>11</sup> was published and covers UK emissions reductions in the period 2028 to 2032. The Fifth Carbon Budget outlines *"the power sector has a vital role in meeting carbon budgets. In 2030, almost a third of the reduction in emissions in other sectors in our scenarios is dependent on availability of low-carbon power"* (which includes providing energy from renewable sources). The Fifth Carbon Budget also recognises that the transition to a low-carbon electricity system brings new challenges in grid management due to higher levels of intermittent and variable renewable generation. This includes the need for back-up firm capacity for wind and solar generation, the risk of excess generation at times of low demand, and the need for additional infrastructure to transmit power generated in more remote locations.
- 2.2.5 Climate Change Committee's Sixth Carbon Budget<sup>12</sup> was published in December 2020 and covers the period 2033 – 2037 and highlights the need to strengthen the UK's power grid and the importance to upgrade of electricity grids to manage the widespread electrification.
- 2.2.6 In February 2025, the Climate Change Committee's Seventh Carbon Budget<sup>13</sup> and latest Carbon budget was released which covers 2038 to 2042. The Seventh Carbon Budget provides advice for the UK Government and sets out recommendations to reach net zero by 2050. The Seventh Carbon Budget also outlines that *"electrification and low-carbon electricity supply make up the largest share of emissions reductions in our pathway, 60% by 2040"*. In addition, the Seventh Carbon Budget also highlights that *"UK-based renewable energy provides the bulk of generation in a larger, future electricity system. Electricity then replaces oil and gas across most of the economy, including Electric Vehicles (EVs), buildings, and much of industry. This requires twice as much electricity as today by 2040"*.
- 2.2.7 The Proposed Development would support the Carbon Budget and Climate Change Act goals to reach net zero, by providing transmission infrastructure which enables renewable energy generation.

#### *The UK Energy White Paper (2020)<sup>14</sup>*

- 2.2.8 The UK Government Energy White Paper 'Powering our Net Zero Future' published in December 2020, sets out that: *"electricity is a key enabler for the transition away from fossil fuels and decarbonising the economy cost-effectively by 2050"*. It states a key objective is to *"accelerate the deployment of clean electricity generation through the 2020s"*. Electricity demand is forecast to double out to 2050, which will *"require a four-fold increase in clean electricity generation with the decarbonisation of electricity increasingly underpinning the delivery of our net zero target"*.

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<sup>9</sup> Committee on Climate Change. (2013) *The Fourth Carbon Budget – assessment of climate risk and the international response*. Available online at: <https://www.theccc.org.uk/publication/fourth-carbon-budget-review-part-1/> [Accessed: October 2025]

<sup>10</sup> Committee on Climate Change (2013) *The Fourth Carbon Budget – The Cost-effective path to the 2050 target*. Available online at: [https://www.theccc.org.uk/wp-content/uploads/2013/12/1785a-CCC\\_AdviceRep\\_Singles\\_1.pdf](https://www.theccc.org.uk/wp-content/uploads/2013/12/1785a-CCC_AdviceRep_Singles_1.pdf) [Accessed: October 2025]

<sup>11</sup> Committee on Climate Change (2015). *The Fifth Carbon Budget – The next step towards a low-carbon economy*. Available online at: <https://www.theccc.org.uk/publication/the-fifth-carbon-budget-the-next-step-towards-a-low-carbon-economy/> [Accessed: October 2025]

<sup>12</sup> Committee on Climate Change (2020) *Sixth Carbon Budget – The UK's path to Net Zero* Available online at: <https://www.theccc.org.uk/publication/sixth-carbon-budget/> [Accessed: October 2025]

<sup>13</sup> Committee on Climate Change (2025) *The Seventh Carbon Budget – Advice for the UK government*. Available online at: <https://www.theccc.org.uk/publication/the-seventh-carbon-budget/> [Accessed: October 2025]

<sup>14</sup> Department for Business, Energy and Industrial Strategy (2020) *Energy white paper: Powering our net zero future*. CP 337. London: HMSO. Available online at: <https://www.gov.uk/government/publications/energy-white-paper-powering-our-net-zero-future> [Accessed: October 2025]



2.2.9 The White Paper and its policies set out that the scale of change required to tackle climate change is at a crucial point. The Paper therefore anticipates that there is a need for a fundamental, global response to tackling climate change issues. Chapter 1 of the White Paper outlines the likely change in the nature and volume of electricity generation. The Proposed Development's role as transmission infrastructure, which enables renewable energy generation, aligns with the White Paper.

*British Energy Security Strategy (2022)<sup>15</sup>*

2.2.10 The British Energy Security Strategy was published as part of the UK Government's response to global energy volatility, particularly as a result of the COVID-19 pandemic and Russia's invasion of Ukraine. It outlines a long-term plan to reduce the UK's dependence on imported fossil fuels and to accelerate the transition to a secure, affordable, and low-carbon energy system.

2.2.11 The further deployment of renewable generation sources, including onshore wind and associated infrastructure, is a central pillar of the strategy. Scotland's ambitious onshore wind targets (as outlined in the 2022 Onshore Wind Policy Statement<sup>16</sup> discussed in the subsequent Scottish policy section) align directly with the 2022 British Energy Security Strategy.

2.2.12 The Proposed Development supports the delivery of the British Energy Security Strategy by enabling further renewable electricity generation from onshore wind.

*Clean Power 2030 Action Plan<sup>17</sup> & NESO's Pathway to 2030 report<sup>18</sup> (2024)*

2.2.13 The UK Government's Clean Power 2030 Action Plan set out a national plan for the accelerated delivery of infrastructure necessary for nationwide clean energy generation by 2030. The Action Plan, produced by the Department for Energy Security & Net Zero (DESNZ) aims to coordinate together issues of energy security, economic growth, and climate protection.

2.2.14 The Action Plan, published in December 2024, sets out a series of targets to be achieved by 2030:

- Metric 1a: Clean sources produce at least as much power as Great Britain consumes in total;
- Metric 1b: Clean sources produce at least 95% of Great Britain's generation; and
- Metric 2: Reduce the carbon intensity of electricity generation to below 50 g CO<sub>2</sub>e / kWh.

2.2.15 The Action Plan recognises the strong role that the planning system will play in realising this long-term vision. Ambitious targets for clean electricity generation, with regions and quotas established, encourage the proliferation of onshore wind and associated infrastructure such as that presented by the Proposed Development.

2.2.16 The Action Plan outlines key benefits of continued onshore wind development, including economic growth and job creation, energy security and price stability, community benefits, and the underlining climate and environmental impact. The action plan then calls for planning reform to support the accelerated delivery of onshore wind, including the suggestion that onshore wind (and other clean energy generation projects) should be supported, accelerated, and prioritised in planning processes.

2.2.17 National Energy System Operator (NESO) was commissioned by DESNZ to provide an independent advice report on the feasibility requirements for the success of the Clean Power 2030 Action Plan. The Report, titled "*Clean Power 2030 – Advice on achieving clean power for Great Britain by 2030*", outlined the requirements in terms of location and type of investment and infrastructure.

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<sup>15</sup> HM Government (2022) *British energy security strategy*. London: Department for Business, Energy & Industrial Strategy. Available online at: <https://www.gov.uk/government/publications/british-energy-security-strategy> [Accessed: October 2025]

<sup>16</sup> Scottish Government (2022) *Onshore wind: policy statement 2022*. Edinburgh: Scottish Government. Available online at: <https://www.gov.scot/publications/onshore-wind-policy-statement-2022/> [Accessed: October 2025]

<sup>17</sup> UK Government (2024) *Clean Power 2030 Action Plan*. London: Department for Energy Security and Net Zero. Available online at: <https://www.gov.scot/publications/foi-202500452601/> [Accessed: October 2025]

<sup>18</sup> National Energy System Operator (2024) *Clean Power 2030: Advice on achieving clean power by 2030*. Available online at: <https://www.neso.energy/publications/clean-power-2030> [Accessed: October 2025]

- 2.2.18 The NESO report calls in particular for the scaling up of annual delivery of onshore wind projects to enable the doubling of onshore wind capacity from 14 GW in 2023 to 27 GW by 2030. The Proposed Development contributes to the achievement of this target by enabling a new onshore wind development.

*Climate Change Committee Report to UK Parliament<sup>19</sup> & The UK Government's Response<sup>20</sup> (2024)*

- 2.2.19 Under the Climate Change Act 2008, the Climate Change Committee (CCC) is required to publish annual progress reports on the goals set out in the 2008 Act and subsequent amendments. These reports, made to the UK Parliament, assess UK Government performance in reducing greenhouse gas emissions and meeting the legally binding carbon budgets (see paragraphs 5.2.4-5.2.9).
- 2.2.20 The 2024 CCC Report to UK Parliament is the latest annual report on the 2008 Act, and so it currently most relevant to the Proposed Development.
- 2.2.21 The 2024 CCC Report found that following the previous government's policy reversals, delays, and a lack of credible plans for emissions reductions, rapid corrective action was urgently needed for the UK to meet the 2030 targets. The report recommended the accelerated deployment of renewable energy generation and associated infrastructure, including onshore wind.
- 2.2.22 The UK Government published a response statement titled "*Accelerating to Net Zero: Responding to the CCC Progress Report and delivering the Clean Energy Superpower Mission*"<sup>21</sup>. This response sets out a series of immediate strategic actions to be delivered immediately. Among these actions was the removal of the de facto onshore wind ban in England, which was one of the CCC's top ten priority actions. The response also references the creation of the Onshore Wind Industry Taskforce. While not directly reflective of the Scottish policy position, this outlines the UK Government's support for new onshore wind projects (and associated infrastructure) across the UK as an important source of renewable energy toward meeting national targets.
- 2.2.23 The Proposed Development aligns well with the issues raised by the Report & Response by enabling a move towards increased electrification and reduced carbon emissions.

## Scottish Energy Policy and Legislation

*The Global Climate Emergency - Scotland's Response<sup>22</sup> (2019)*

- 2.2.24 Climate Change Secretary Roseanna Cunningham made a statement to the Scottish Parliament on the 14th of May 2019 entitled 'The Global Climate Emergency - Scotland's Response'. In the statement, the Scottish Government declares a climate change emergency and sets out that "*the next National Planning Framework and review of the Scottish Planning Policy will include considerable focus on how the planning system can support our climate change goals*".
- 2.2.25 The declaration of a Climate Emergency serves as a key underlying principle of Scottish climate and energy policy, which highlights the urgency and breadth of action required and implemented since by the Scottish Government.

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<sup>19</sup> Climate Change Committee (2024) *Progress in reducing emissions: 2024 Report to Parliament*. London: CCC. Available online at: <https://www.theccc.org.uk/publication/progress-in-reducing-emissions-2024-report-to-parliament/> [Accessed: October 2025]

<sup>20</sup> Department for Energy Security and Net Zero (2024) *Accelerating to net zero: responding to the CCC progress report and delivering the Clean Energy Superpower Mission*. HC 486. London: HMSO. Available online at: <https://www.gov.uk/government/publications/committee-on-climate-change-2024-progress-report-government-response> [Accessed: October 2025]

<sup>21</sup> Department for Energy Security and Net Zero (2024) *Accelerating to net zero: responding to the CCC progress report and delivering the Clean Energy Superpower Mission*. HC 486. London: HMSO. Available online at: <https://www.gov.uk/government/publications/committee-on-climate-change-2024-progress-report-government-response> [Accessed: October 2025]

<sup>22</sup> Scottish Government (2019) *The global climate emergency – Scotland's response: statement by the Cabinet Secretary for Environment, Climate Change and Land Reform*. Edinburgh: Scottish Government. Available online at: <https://www.gov.scot/publications/global-climate-emergency-scotlands-response-climate-change-secretary-roseanna-cunninghams-statement> [Accessed: October 2025]

- 2.2.26 Renewable energy generation, including onshore wind, is highlighted a key element of Scotland's ongoing emission reduction efforts: *"Scotland has already almost halved emissions since 1990 while growing the economy, increasing employment and productivity. We will continue to do so. And we're doing this with domestic effort alone – including through our world-leading deployment of renewable energy technologies such as onshore wind."* By enabling onshore wind development in Scotland, the Proposed Development supports the continued role of onshore wind in Scottish emission reduction efforts.

*Scottish Government Energy Strategy (2017)<sup>23</sup> and Draft Scottish Government Energy Strategy and Just Transition Plan (2023)<sup>24</sup>*

- 2.2.27 The 2017 Scottish Government Energy Strategy prioritises a shift towards a low-carbon energy system, with a strong focus on renewable electricity and the development of local energy systems. It aims for 50% of Scotland's total energy consumption (including electricity, heat, and transport) to be supplied by renewable sources by 2030, and net-zero greenhouse gas emissions by 2045. The strategy also emphasises the need for a well-balanced system capable of providing secure and affordable energy.
- 2.2.28 The Scottish Government published the Draft Energy Strategy and Just Transition Plan on 10th January 2023. Chapter 3 'Energy Supply' states that the Scottish Government, *"will place climate and nature at the centre of our planning system in line with the Revised National Planning Framework 4, making clear our support for all forms of renewable, low- carbon and zero emission technologies, including transmission and distribution infrastructure"*. The draft Strategy also specifically addresses energy networks (as outlined on page 136) and states *"Significant infrastructure investment in Scotland's transmission system is needed to ameliorate constraints and enable more renewable power to flow to centres of demand"*.
- 2.2.29 Section 3.2 'Reducing our reliance on other energy sources', states that in alignment with NPF4, the Scottish Government *"encourage, promote and facilitate all forms of renewable energy development onshore and offshore. This includes energy generation, storage, new and replacement transmission and distribution infrastructure"*.
- 2.2.30 Section 5.2 of the Draft Strategy also states: *"Significant infrastructure investment in Scotland's transmission system is needed to ameliorate constraints and enable more renewable power to flow to centres of demand. National Grid ESO has identified the requirement for over £21 billion of investment in GB electricity transmission infrastructure to meet 2030 targets. Over half of this investment will involve Scottish Transmission owners SPEN and SSEN"*.
- 2.2.31 The Proposed Development would support the delivery of the 2017 Strategy and 2023 Draft Strategy by enabling a new renewable energy development, which would contribute toward the 2030 targets.

*The Update to the Climate Change Plan (2018-2032)<sup>25</sup>*

- 2.2.32 The Scottish Government's Climate Change Plan (CCP) 'Securing a Green Recovery on a Path to Net Zero (2018 – 2032) - update' was published on 16 December 2020. The CCP was updated to address the revised net zero targets, which are ultimately set to end Scotland's contribution to climate change by 2045. The timeframe covered by the CCP was set in parallel to the deadline for the Government's commitment to reduce greenhouse gas emissions by 75% by 2030 (compared with 1990 levels), which was later revised by the 2019 & 2024 Acts as detailed in this section.

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<sup>23</sup> Scottish Government (2017) *Scottish energy strategy: The future of energy in Scotland*. Edinburgh: Scottish Government. Available online at: <https://www.gov.scot/publications/scottish-energy-strategy-future-energy-scotland-9781788515276/> [Accessed: October 2025]

<sup>24</sup> Scottish Government (2023) *Draft Energy Strategy and Just Transition Plan*. Edinburgh: Scottish Government. Available online at: <https://www.gov.scot/publications/draft-energy-strategy-transition-plan/> [Accessed: October 2025]

<sup>25</sup> Scottish Government (2020). *Securing a green recovery on a path to net zero: climate change plan 2018–2032 - update*. Available online at: [Securing a green recovery on a path to net zero: climate change plan 2018–2032 - update - gov.scot](https://www.gov.scot/publications/securing-a-green-recovery-on-a-path-to-net-zero-climate-change-plan-2018-2032-update-2020-12-16/pages/1/) [Accessed: October 2025]

- 2.2.33 A key part of the CCP is the green recovery, which states: *“It is essential that our recovery from the pandemic responds to the climate emergency and puts us on a pathway to deliver our statutory climate change targets and a just transition to net zero, by ensuring our actions in the immediate term are in line with our long-term goals. The Scottish Government has been clear in its commitment to securing a just and green recovery, which prioritises economic, social and environmental well-being, and responds to the twin challenges of the climate emergency and biodiversity loss”*.
- 2.2.34 The CCP update sets the context in terms of electricity systems, stating that *“... further policies to continue the rapid growth in renewable generation over the past 20 years, moving from a low to a zero- carbon electricity system...”*. The Proposed Development, as an enabling piece of transmission infrastructure for renewable generation, is aligned with the CCP.
- 2.2.35 Electricity is further addressed in Chapter 1, Paragraph 3.1.4, which recognises that, as Scotland's places and economy transition to net zero, the growing and increasingly decarbonised electricity sector *“is critical to enabling other parts of our economy to decarbonise – notably transport, buildings and industry”*.
- 2.2.36 Furthermore, Section 2.5 recognises the coordinated approach that is needed and refers to the planning system and the at that time forthcoming NPF4. Planning is described as a *“key delivery mechanism for many of the policies within this climate change plan update, across all sectors”*.
- 2.2.37 The Proposed Development supports the Update Climate Change Plan's goals by enabling new renewable energy that reduces greenhouse gas emissions.

*Scottish Onshore Wind Policy Statement (OWPS) 2022<sup>26</sup>*

- 2.2.38 The Scottish OWPS 2022 sets a target of 20 GW installed onshore wind capacity by 2030. The OWPS emphasises that onshore wind will be a critical generation method in the delivery of the 2030/2045 targets set out in the legislation detailed above. The OWPS describes the deployment of onshore wind developments, such as that which is proposed as *“mission critical”* for meeting these targets.
- 2.2.39 The Proposed Development supports the advancement of onshore wind projects in Scotland by enabling the establishment of new renewable energy infrastructure.

*The Climate Change (Emissions Reduction Targets) (Scotland) Act 2024<sup>27</sup>*

- 2.2.40 The Climate Change (Scotland) Act 2009<sup>28</sup> set ambitious and, at the time, world leading greenhouse gas emissions reduction targets, including a target to reduce emissions by 80% by 2050. The most recent legislation is the Climate Change (Emissions Reduction Targets) (Scotland) Act 2024, which superseded the 2009 Act and the intermediary 2019 Act.
- 2.2.41 The 2024 Act aimed to relax the pace at which reduction targets were expected, replacing the emissions reduction targets with a system of targets based on carbon budgets, which are to be set every five years, while still retaining the 2045 net zero emissions target.
- 2.2.42 Immediately preceding the release of the 2024 Act, the Climate Change Commission delivered a report to Scottish Parliament titled *“Progress in reducing emissions in Scotland”* (March 2024)<sup>29</sup>. The report set out that the Scottish Government was not going to meet its 2030 targets as set out in the 2009 & 2019 Acts and demands stronger action and reinforces the need for much more generating capacity.

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<sup>26</sup> Scottish Government (2022) *Onshore wind: policy statement 2022*. Edinburgh: Scottish Government. ISBN 9781805253754. Available online at: <https://www.gov.scot/publications/onshore-wind-policy-statement-2022/> [Accessed: October 2025]

<sup>27</sup> *Climate Change (Emissions Reduction Targets) (Scotland) Act 2024*, asp 15. Available online at: <https://www.legislation.gov.uk/asp/2024/15/enacted> [Accessed: October 2025]

<sup>28</sup> Scottish Government (2009). *Climate Change (Scotland) Act 2009*. Available online at: <https://www.legislation.gov.uk/asp/2009/12/contents> [Accessed: October 2025]

<sup>29</sup> Climate Change Committee (2024). *Progress in reducing emissions in Scotland – 2023 Report to Parliament*. Available online at: <https://www.theccc.org.uk/publication/progress-in-reducing-emissions-in-scotland-2023-report-to-parliament/> [Accessed: October 2025]

- 2.2.43 The Proposed Development is intended to support the emission reductions outlined in legislation by enabling the connection of new renewable energy generation to the grid and facilitating the adoption of zero-emission technologies.

*The Scottish Government's Green Industrial Strategy (2024)*<sup>30</sup>

- 2.2.44 The Green Industrial Strategy (2024) frames renewable energy development as an economic opportunity for Scotland, and outlines the actions needed by the Scottish Government and partners to create a positive environment for investment and growth within the renewables sector.
- 2.2.45 The Strategy reaffirms the onshore wind sector as a key segment of the Scottish green industries and recognises the economic benefit of continued onshore wind development. The Proposed Development enables a new onshore wind development, thus aligning with the Green Industrial Strategy (2024).
- 2.2.46 The Proposed Development supports this strategy as it enables onshore wind development through developing the electricity transmission network. The Strategy includes commitments to accelerating consenting timescales for electricity network infrastructure to ensure rapid delivery in line with net zero targets.

*Scotland Carbon Budgets (2025)*<sup>31</sup>

- 2.2.47 The Scotland Carbon Budget was published in May 2025 and identifies that renewables play an essential role in meeting Scotland's carbon budgets as well as the wider UK emissions targets. Furthermore, to reach net zero, the capacity of variable renewables in Scotland (including offshore and onshore wind and solar) is required to be more than tripled from 15 Gigawatt (GW) in 2023 to 49 GW by 2035, increasing to 66 GW by 2045. Scotland's Carbon Budget highlights the important role of transmission and distribution networks in reaching net zero. Scotland's Carbon Budget outlines that *"the capacity of transmission and distribution networks will need to be increased at pace to ensure supply is able to be transported to sources of demand as electricity generation is increasingly decarbonised and demand grows"*. Furthermore, the Scotland Carbon Budget states that to deliver clean electricity the transmission grid requires rapid expansion, together with speeding up the grid connection process.
- 2.2.48 As stated in the Carbon Budget targets for new renewable generation, infrastructure such as the Proposed Development is essential to connect these to the electricity grid and enable the reduction of carbon emissions.

## 2.3 National Planning Framework 4

- 2.3.1 NPF4 contains the national spatial strategy for Scotland and sets out Scottish Government's spatial principles, regional priorities, national developments and national planning policy.
- 2.3.2 NPF4 sets out national planning policy in Part 2 of the document. Following review, the policies which have been identified as relevant to the Proposed Development are set out below:
- Policy 1 - Tackling the Climate and Nature Crisis
  - Policy 2 - Climate Change Mitigation and Adaptation
  - Policy 3 – Biodiversity
  - Policy 4 - Natural Places
  - Policy 5 - Soils

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<sup>30</sup> Scottish Government. (2024). *Green industrial strategy*. Edinburgh: Scottish Government. Available online at: <https://www.gov.scot/publications/green-industrial-strategy/> [Accessed: October 2025]

<sup>31</sup> Committee on Climate Change. (2025). *Scotland's Carbon Budgets*. Available online at: <https://www.theccc.org.uk/publication/scotlands-carbon-budgets/> [Accessed: August 2025]



- Policy 7 – Historic Assets and Places
- Policy 11 - Energy
- Policy 12 - Zero Waste
- Policy 22- Flood Risk and Water management
- Policy 23 - Health and safety
- Policy 29 - Rural Development

- 2.3.3 One of the key policies relevant to the Proposed Development in NPF4 is Policy 11 ‘Energy’. The policy intent is to, “encourage, promote and facilitate all forms of renewable energy development onshore and offshore. This includes ... new and replacement transmission and distribution infrastructure”. Project design and mitigation should demonstrate how development impacts are addressed.
- 2.3.4 The Proposed Development is situated within the ‘South’ region identified within NPF4, with key spatial priorities identified within Part 3 of the document. In NPF4 the third priority for the South region is to “Support local economic development whilst making sustainable use of the area’s worldclass environmental assets to innovate and lead greener growth”. NPF4 notes that the Strategic Renewable Electricity Generation and Transmission Infrastructure National Development Type (National Development 3) will support the delivery of the spatial strategy for the South region. The Proposed Development would be considered a National Development on the basis of the criteria in the NPF4. Furthermore, the Proposed Development serves as a new infrastructure to facilitate transmission of electricity generated from a new renewable source and therefore aligns with NPF4 policies with regard to the principle of the Proposed Development.
- 2.3.5 Policy analysis for NPF4 policies is provided in **Table 2.1** below, which describes each policy and its relevance to the Proposed Development.

**Table 2.1 – Analysis of NPF4 Policies**

Policy	Key Considerations	Relevance to the Proposed Development
Policy 1- Tackling the Climate and Nature Crisis	Significant weight will be given to the global climate and nature crisis when considering all development proposals, with intended policy outcomes being “zero carbon” and “nature positive places”.	<p>The Proposed Development relates to the construction of a new substation, ensuring continued efficient transmission of electricity in the south-west of Scotland.</p> <p>By facilitating continuation of this transmission, which distributes energy from renewable generation, the Proposed Development would support Scotland’s ambitions to become “zero carbon”.</p> <p>Given the size of the Proposed Development and the biodiversity enhancement proposed, it is considered that it would have a positive effect on natural habitat.</p> <p>It is therefore considered that the Proposed Development aligns with Policy 1.</p>
Policy 2 – Climate change mitigation and adaptation	Development proposals will be sited and designed to minimise lifecycle greenhouse emissions as much as possible and adapt to the current and future risks of climate change. Additionally retrofit	The Proposed Development mitigates climate change and minimises carbon emissions by facilitating the transmission of electricity generated from renewable

Policy	Key Considerations	Relevance to the Proposed Development
	<p>measures that reduce emissions or support this adaptation process will be supported. Intended policy outcomes being minimised emissions from developments and places that are more resilient to climate change.</p>	<p>sources. In addition, the proposal relates to a new substation which would support efficient transmission of energy, reducing potential network disruption or energy losses.</p> <p>It is therefore considered that the Proposed Development aligns with Policy 2.</p>
Policy 3 – Biodiversity	<p>National or major development will only be supported where it can be demonstrated that the proposal will conserve, restore and enhance biodiversity and nature networks. Proposals within these categories will demonstrate how they have met all of the following criteria:</p> <ul style="list-style-type: none"> <li>• the proposal is based on an understanding of the existing characteristics of The Site and its local, regional and national ecological context prior to development, including the presence of any irreplaceable habitats;</li> <li>• wherever feasible, nature-based solutions have been integrated and made best use of;</li> <li>• an assessment of potential negative effects which should be fully mitigated in line with the mitigation hierarchy prior to identifying enhancements;</li> <li>• significant biodiversity enhancements are provided, in addition to any proposed mitigation. This should include nature networks, linking to and strengthening habitat connectivity within and beyond the development, secured within a reasonable timescale and with reasonable certainty.</li> </ul> <p>Management arrangements for their long-term retention and monitoring should be included, wherever appropriate; and local community benefits of the biodiversity and/or nature networks have been considered.</p>	<p>The impacts and effects of the Proposed Development on surrounding habitats and species can be mitigated through enhancement.</p> <p>The Applicant has committed to achieving no net loss of biodiversity across all of its projects at a business-wide level and to achieving a net gain based on the relevant legislation and policy. No net loss cannot be achieved on site, and as such off-site habitat creation / enhancement would be undertaken.</p> <p>It is therefore considered the Proposed Development aligns with Policy 3.</p>
Policy 4 - Natural Places	<p>Development proposals which by virtue of type, location or scale will have an unacceptable impact on the natural environment, will not be supported. Development proposals affecting designated areas such as Special Areas of Conservation or Special Protection Areas, National Parks, Natural Scenic Areas, Sites of Special Scientific Interest or Natural reserves will only be supported with due assessment. This involves consideration given to the benefits of development versus the</p>	<p>The Proposed Development would not have an adverse impact on the natural environment or designated areas, given the size of the Proposed Development and the embedded mitigation.</p> <p>Further to this, although priority habitats are present within The Site these are still typical and widespread habitats in the Dumfries and Galloway region.</p>

Policy	Key Considerations	Relevance to the Proposed Development
	detrimental impacts on nature, where enhancing and protecting designated areas is given significant weight. Additionally, development proposals within NatureScot Wild Areas will only be supported to meet renewable energy targets or to support fragile rural communities.	Given its essential role in electricity transmission, it's important to consider the benefits of the Proposed Development as it helps achieve renewable energy and carbon reduction goals.  Therefore, the Proposed Development aligns with Policy 4.
Policy 5 - Soils	Development proposals will only be supported if designed and constructed in accordance with the mitigation hierarchy by first avoiding and then minimising the amount of disturbance to soils on undeveloped land, and in a manner that protects soil from damage including from compaction and erosion, and that minimises soil sealing. Development proposals on prime agricultural land, or land of lesser quality that is culturally or locally important for primary use, peatland, carbon-rich soils, and priority peatland habitat, will only be supported where it is for essential infrastructure and there is a specific locational need and no other suitable site. Where development on peatland, carbon-rich soils or priority peatland habitat is proposed, a detailed site-specific assessment will be required.	The Proposed Development would not have an adverse impact on soils due to the relatively small scale of the Proposed Development.  In addition, the Proposed Development has followed the Peat Mitigation Hierarchy. A Soil and Peat Management Plan has been prepared which details appropriate mitigation of impacts. Soil disturbance would be mitigated through adherence to mitigation measures presented in the Outline CEMP.  It is therefore considered the Proposed Development aligns with Policy 5.
Policy 7 - Historic Assets and Places	Development proposals with a potentially significant impact on historic assets or places will be accompanied by an assessment which is based on an understanding of the cultural significance of the historic asset and/or place. The assessment should identify the likely visual or physical impact of any proposals for change, including cumulative effects and provide a sound basis for managing the impacts of change. Proposals should also be informed by national policy and guidance on managing change in the historic environment, and information held within Historic Environment Records.	The archaeological potential for the Proposed Development is anticipated to be low. It is likely that, should any remains survive, that they would be of low value, most likely be related to medieval to modern agricultural practices.  To mitigate the potential physical impacts to any unknown sub-surface archaeological remains, it is considered that a watching brief should be implemented on any ground breaking works, with a Written Scheme of Investigation (WSI) created to highlight specific areas.  It is therefore considered the Proposed Development aligns with Policy 7.
Policy 11 – Energy	Development proposals for all forms of renewable, low-carbon and zero emissions technologies will be supported. Including enabling works, such as grid transmission and distribution infrastructure.	The Proposed Development is clearly supported by Policy 11 of the NPF4 as the proposal forms part of the strategic electricity transmission network. In addition, the Proposed Development



Policy	Key Considerations	Relevance to the Proposed Development
	In considering the variety of impacts, significant weight will be placed on the contribution of the proposal to renewable energy generation targets and on greenhouse gas emissions reduction targets. Grid capacity should not constrain renewable energy development. It is for developers to agree connections to the grid with the relevant network operator. In the case of proposals for grid infrastructure, consideration should be given to underground connections where possible.	would enable the transmission of electricity generated from renewable sources to the national grid and support Scotland's ambitions to reduce its carbon emissions and ultimately the transition to a zero-carbon system.  Policy 11 also states that project design and mitigation would demonstrate how development impacts are addressed. For landscape impacts, it states that, <i>"where impacts are localised and/ or appropriate design mitigation has been applied, they will generally be considered to be acceptable"</i> .  The Proposed Development therefore aligns with Policy 11.
Policy 12 – Zero Waste	Development proposals will seek to reduce, reuse and recycle materials in line with the waste hierarchy.  Development proposals will be supported where they: reuse existing buildings and infrastructure; minimise demolition and salvage materials for reuse; minimise waste, reduce pressure on virgin resources and enable building materials, components and products to be disassembled, and reused at the end of their useful life; use materials that are suitable for reuse with minimal reprocessing.	No significant waste is anticipated to arise during the construction or operation of the Proposed Development, and any waste or litter would be managed in accordance with the relevant waste regulations.  Furthermore, the Proposed Development would follow the waste hierarchy, which is as follows;  i. Eliminate - Design out waste  ii. Reduce - Minimise waste generation  iii. Reuse - Reuse materials on site if possible  iv. Recycle - Reprocess materials for off-site use  v. Recover - Recovery of energy from waste sent off site  vi. Dispose - Least desirable option – last resort  It is therefore considered that the Proposed Development would align with Policy 12 of NPF4.
Policy 22 – Flood Risk and Water Management	Development proposals will not increase the risk of surface water flooding to others, or itself be at risk.	The Proposed Development has minimised the area of impermeable surface and incorporated SuDS ponds

Policy	Key Considerations	Relevance to the Proposed Development
	<p>Managing all rain and surface water through sustainable urban drainage systems (SuDS), should form part of and integrate with proposed and existing blue-green infrastructure. All proposals should presume no surface water connection to the combined sewer and seek to minimise the area of impermeable surface.</p>	<p>as an integral part of the design in order to manage rain and surface water.</p> <p>It is therefore considered the Proposed Development aligns with Policy 22.</p>
<p>Policy 23 – Health and safety</p>	<p>a) Development proposals that will have positive effects on health will be supported. This could include, for example, proposals that incorporate opportunities for exercise, community food growing or allotments.</p> <p>b) Development proposals which are likely to have a significant adverse effect on health will not be supported. A Health Impact Assessment may be required.</p> <p>c) Development proposals for health and social care facilities and infrastructure will be supported.</p> <p>d) Development proposals that are likely to have significant adverse effects on air quality will not be supported. Development proposals will consider opportunities to improve air quality and reduce exposure to poor air quality. An air quality assessment may be required where the nature of the proposal or the air quality in the location suggest significant effects are likely.</p> <p>e) Development proposals that are likely to raise unacceptable noise issues will not be supported. The agent of change principle applies to noise sensitive development. A Noise Impact Assessment may be required where the nature of the proposal or its location suggests that significant effects are likely.</p> <p>f) Development proposals will be designed to take into account suicide risk.</p> <p>g) Development proposals within the vicinity of a major accident hazard site or major accident hazard pipeline (because of the presence of toxic, highly reactive, explosive or inflammable substances) will consider the associated risks and potential impacts of the proposal and the major accident hazard site/pipeline of being located in proximity to one another.</p> <p>h) Applications for hazardous substances consent will consider the likely potential impacts on surrounding populations and the environment.</p>	<p>For the construction phase of the Proposed Development, the Principal Contractor would apply Best Practicable Means (BPM) to mitigate impact of noise and vibration.</p> <p>During operational phase, the proposed fixed plant to be installed and operated as part of the Proposed Development would be designed such that the derived Rating Level for the operational plant is no greater than existing background sound levels. Compliance with appropriately derived sound level limits could be ensured by use of an appropriately worded planning condition.</p> <p>The design of the Proposed Development has also considered site security, implementing palisade fencing to prevent unauthorised access by members of the public.</p> <p>It is therefore considered the Proposed Development aligns with Policy 23.</p>

Policy	Key Considerations	Relevance to the Proposed Development
	<p>i) Any advice from Health and Safety Executive, the Office of Nuclear Regulation or the Scottish Environment Protection Agency that planning permission or hazardous substances consent should be refused, or conditions to be attached to a grant of consent, should not be overridden by the decision maker without the most careful consideration.</p> <p>j) Similar considerations apply in respect of development proposals either for or near licensed explosive sites (including military explosive storage sites).</p>	
Policy 29 – Rural Development	<p>Development proposals in rural areas should be suitably scaled, sited and designed to be in keeping with the character of the area.</p> <p>Development proposals in remote rural areas, where new development can often help to sustain fragile communities, will be supported where the proposal can lead to local employment, and is suitable in terms of location, access, siting, design and environmental impact.</p>	<p>The planned landscape planting around the area would mature and help screen views of the Proposed Development.</p> <p>The impact on the landscape character would remain minor in the immediate vicinity of The Site, becoming negligible in the broader landscape.</p> <p>It is therefore considered the Proposed Development aligns with Policy 29.</p>

## 2.4 Local Development Plan Policy

- 2.4.1 The Site lies within the jurisdiction of Dumfries & Galloway Council, with adopted planning policy comprising the Dumfries & Galloway Local Development Plan 2 (LDP2). The LDP2 was adopted in October 2019 and sets out how the Council wants to see Dumfries & Galloway develop over the next 20 years.
- 2.4.2 The Proposed Development is shown as being within a Regional Scenic Area on the Proposals Map within LDP2, as well as within the UNESCO Galloway and Southern Ayrshire Biosphere – transition area.
- 2.4.3 The Proposed Development enables transmission of energy generated from renewable sources. The following **Table 2.2** highlights the relevant policies in the LDP2 against which the Proposed Development should be assessed:

**Table 2.2 - Relevant Dumfries & Galloway LDP2 Policy Assessment**

Policy	Assessment Against Planning Policy
Policy OP1: Development Considerations	<p>The Proposed Development supports the transmission of renewable electricity, helping to combat climate change and reduce carbon emissions. <b>Chapters 3 to 6</b> of the EA detail the environmental effects of the Proposed Development by topic.</p> <p>Mitigation would address the environmental effects noted in the EA. The Proposed Development would have landscape impacts during construction which would be reduced during operation through landscape planting to screen the Proposed Development.</p> <p>Additionally, the Proposed Development would provide biodiversity enhancement, as The Applicant is committed to ensuring no net loss of biodiversity across all its projects and aims for a net gain.</p>

Policy	Assessment Against Planning Policy
	<p>Since achieving no net loss on-site is not feasible, habitat creation and enhancement would be conducted off-site.</p> <p>As crucial electricity transmission infrastructure, the Proposed Development is considered to align with Policy OP1 objectives, given the suitable environmental mitigation measures detailed in the EA.</p> <p>The Proposed Development is therefore compliant with Policy OP1.</p>
Policy ED10: Galloway and Southern Ayrshire Biosphere	<p>The Proposed Development is shown as being within the UNESCO Galloway and Southern Ayrshire biosphere – transition area.</p> <p>The Proposed Development would not have a significant adverse impact on the natural heritage/special wildlife areas; one of the key reasons for the UNESCO Biosphere designation.</p> <p>The Proposed Development is therefore compliant with Policy ED10.</p>
Policy NE2: Regional Scenic Areas	<p>The planned landscape planting between the Proposed Development and the A713 would mature and help screen views of the Proposed Development. The impact on the landscape character would remain minor in the immediate vicinity of The Site, becoming negligible in the broader landscape.</p> <p>The Proposed Development is therefore compliant with Policy NE2.</p>
Policy NE15: Protection and Restoration of Peat Deposits as Carbon Sinks	<p>This policy aims to protect peat deposits as carbon sinks, stating that “<i>The role of natural carbon sinks in retaining carbon dioxide would be maintained by safeguarding and protecting peat deposits</i>”, even if not designated for conservation. The Council supports “peatland restoration, including rewetting.” Development may be allowed in “areas of degraded peatland” if the deposits are “significantly damaged by human activity”, have “low conservation value”, and cannot be restored. In such cases, “appropriate site restoration measures” are required. Renewable energy projects may be permitted if they show a net climate benefit using “the Scottish Government’s ‘carbon calculator’ or other equivalent independent evidence.” Peatland impacts, as well as the proposed mitigation measures, are outlined in <b>Chapter 5: Hydrology, Hydrogeology, Geology and Soils</b> of the EA and in the <b>Appendix 5.1</b> of the EA ‘<b>Soil and Peat Management Plan</b>’.</p> <p>The Proposed Development is therefore compliant with Policy NE15.</p>
Policy IN1: Renewable Energy	<p>Policy IN1 outlines that the Council would support development proposals for all renewable energy generation and/or storage which are located, sited and designed appropriately. The acceptability of the Proposed Development would be assessed against the following considerations: landscape and visual impact; cumulative impact; impact on local communities and individual dwellings, including visual impact, residential amenity, noise and shadow flicker; the impact on natural and historic environment (including cultural heritage and biodiversity); the impact on forestry and woodlands; the impact on tourism, recreational interests and public access. It is noted that acceptability would be determined through an assessment of the details of the proposal including its benefits and the extent to which its environmental and cumulative impacts can be satisfactorily addressed.</p> <p>The Proposed Development would in this regard support the transmission of electricity from renewable sources and would aim to meet the Scottish Governments renewable energy generation targets.</p> <p>The Proposed Development is therefore compliant with Policy IN1.</p>
Policy IN6: Waste Management	<p>No significant waste is anticipated to arise during the construction, and any waste or litter would be managed in accordance with the relevant waste regulations.</p> <p>The Proposed Development has been developed to follow the waste hierarchy, which is as follows;</p>

Policy	Assessment Against Planning Policy
Requirements for New Development	<ul style="list-style-type: none"> <li>i. Eliminate - Design out waste.</li> <li>ii. Reduce - Minimise waste generation.</li> <li>iii. Reuse - Reuse materials on site if possible.</li> <li>iv. Recycle - Reprocess materials for off-site use.</li> <li>v. Recover - Recovery of energy from waste sent off site.</li> <li>vi. Dispose - Least desirable option – last resort.</li> </ul> <p>The Proposed Development is therefore compliant with Policy IN6.</p>
Policy IN8: Surface Water Drainage and Sustainable Drainage Systems (SuDS)	<p>The Proposed Development includes Sustainable Drainage Systems (SuDS) designed to control surface water and manage flow. The SuDS design aims to mitigate flood risks from high flows and integrate seamlessly within the proposed site.</p> <p>The Proposed Development is therefore compliant with Policy IN8.</p>

## 2.5 Policy Conclusion

- 2.5.1 The principle of the Proposed Development is supported by the NPF4 and the LDP2. The Proposed Development is also supported by the wider aim objectives set out by the Scottish Government..
- 2.5.2 Within the context of planning and energy policy assessed within this Planning Statement, supporting transmission of renewable energy is an important material consideration. National planning policy contained within NPF4 is now underpinned by a mandate to move to a 'net zero economy and society'. The Proposed Development would be promoting a more reliable electricity transmission network and therefore aligns with policy aims and would contribute towards achieving the statutory outcomes outlined in NPF4. Overall, the Proposed Development as essential infrastructure should be afforded significant weight in the planning balance.
- 2.5.3 The Proposed Development is a strategically important transmission site essential to reinforcing existing critical transmission infrastructure. Furthermore, the Proposed Development would meet the aims and objectives of key policies within the LDP2.
- 2.5.4 This Planning Statement has considered all relevant factors and presents a strong case for granting planning consent. Therefore, it is recommended that planning permission under the Town and Country Planning (Scotland) Act 1997 be approved for the Proposed Development, with appropriate conditions and environmental mitigation.

### 3 CONCLUSION

- 3.1.1 This Planning Statement provides an overview of the Proposed Development and describes the setting within which it is proposed to be located. It sets out the need for the Proposed Development, as a critical piece of electricity transmission infrastructure necessary to enable the planned and future renewable energy schemes within the South of Scotland, and therefore would assist in meeting the requirements of policy OP1. The Proposed Development is an expansion of existing infrastructure to ensure reliable electricity transmission and therefore is in accordance with policy OP1.
- 3.1.2 The potential environmental impacts of the Proposed Development have been given due consideration in the supporting information submitted as part of this planning application. This Planning Statement has also evaluated whether the Proposed Development is acceptable development when assessed against the LDP2 and NPF4 and concludes that it should be granted planning permission due to benefits of the Proposed Development, and it is in accordance with provisions of the development plan, and relevant material considerations.
- 3.1.3 The Proposed Development is needed to enable future and planned renewable energy schemes in South Scotland to come forward. As shown by the supporting environmental appraisal, the environmental impacts are acceptable, and the Proposed Development is in accordance with NPF4 and the Dumfries & Galloway LDP2.
- 3.1.4 Considering the findings of this planning assessment, in combination with those of the accompanying reports, it is considered that this application for planning permission should be granted.