3 June 2025

Nicola Kennedy
Scottish Government
Energy Consents Unit

SLR Project No.: 414.V03539.00016

RE: Proposed Bloch Wind Farm
ECU Reference: ECU00003463

Introduction

RES (the "Applicant") applied to the Scottish Ministers for consent under Section 36 of the Electricity Act 1989 in November 2022 (the "Application") for the construction and operation of Bloch Wind Farm and battery storage electricity generating station (the "proposed development").

In response to advice received from Dumfries & Galloway Council's ("DGC") external landscape consultants received in December 2024 and a meeting which took place with them in February 2025, it is now proposed to amend the layout and design of the proposed development.

This letter and accompanying documentation detail the proposed amendments to the layout and design of the proposed development, sets out the rationale for these changes and provides additional information in support of the amended scheme.

The Original Scheme

The proposed development as originally applied for comprises up to 21 wind turbines and associated infrastructure (the "Original Scheme"). A variety of wind turbine heights were proposed, ranging from 180m to 230m to blade tip. Further details on the Original Scheme are provided in **Chapter 2: Proposed Development Description** of the EIA Report (November 2022), with the site layout and details of the proposed turbine heights shown on **Figure 1.3** of the EIA Report.

Details of the how the layout and design of the proposed development evolved during the pre-application stage in response to environmental and technical constraints and feedback from consultees and members of the public is reported in **Chapter 3: Design Evolution and Considered Alternatives** of the EIA Report. As detailed in this chapter, the layout of the proposed development underwent several design iterations prior to being finalised with consideration of landscape and visual impacts being a key driver in this design evolution. Landscape and visual design considerations that influenced the evolution of the layout included:

- The relationship of the proposed development with the existing Solwaybank Wind Farm, as well as cumulatively with other existing and proposed wind farms in the wider landscape.
- Views of the proposed development from key viewpoints and visual receptors, including from Langholm to the north-east (as the closest settlement) and elevated locations in the Southern Uplands (such as Malcolm Monument) to the north-east.
- Consideration of individual and small groups of residential properties to the south.

- The sensitivity of the surrounding landscape and relationship with designated landscapes.

The key design mitigation employed for the Original Scheme included:

- Reducing the heights of the turbines in the east of the site to minimise their visibility from within Langholm and to reduce the prominence of turbines in views from the east. Three turbines (turbines T19, T20 and T21) were reduced from 230m to 180m to blade tip and two turbines (turbines T14 and T15) were reduced from 230m to 200m to blade tip.
- Positioning turbines westward, further down Bloch Hill, to minimise their visibility from within Langholm and to reduce their prominence in views from the east and south-east.
- Reducing the height of turbines to the south of the site to minimise their prominence in views from the south. Two turbines (turbines T1 and T2) were reduced from 230m to 180m to blade tip. Two further turbines (turbines T3 and T13) were reduced from 230m to 200m to blade tip.
- Positioning wind turbines over 1,050m from the closest third-party residential properties, to minimise the potential for adverse impacts upon residential visual amenity.
- A reduced aviation lighting scheme was agreed with the Civil Aviation Authority (CAA) to minimise potential night-time lighting impacts.

The Applicant was committed to undertaking early and effective consultation with DGC at the pre-application stage to provide them an opportunity to influence and shape the proposals prior to the design being finalised and the Application submitted. Although such pre-application advice was sought[1], no response was received and hence the Applicant was regrettably unable to consider any feedback from DGC on landscape and visual matters in the layout and design of the Original Scheme. Given the length of time from when the Application was submitted, it must be acknowledged that it is now considerably more difficult for the Applicant to make design changes without risking significant further delay to the determination of the application and the associated costs this incurs.

The Revised Scheme

Context to the Revised Scheme

An initial response from DGC's internal landscape architect was received in September 2023 [**Document DGC1**]. This response provided a summary assessment only and not a full review/response. The Applicant was advised by DGC that they would be seeking to appoint an external landscape architect to provide a full consultation response in early 2024. The full consultation response from DGC's external landscape consultant was finally received in December 2024 [**Document DGC2**], over two years after the Application had been submitted.

Whilst not objecting to the Original Scheme, DGC's external landscape consultant response advises that the Applicant consider additional design mitigation including both turbine removal and reduction of turbine heights to minimise the landscape and visual impacts of the proposed development. A similar approach to mitigation was also recommend by DGC's internal landscape architect.

[1] An EIA scoping request was submitted to Scottish Ministers in April 2022 to which DGC did not respond. A further pre-application consultation request was also issued to DGC in July 2022 to discuss and agree landscape and visual matters to which no response was received.

DGC's external landscape consultant response considers that there is scope to notably reduce landscape and visual effects of the proposed development by removing turbines in the eastern and southern parts of the site as well as reducing some turbine heights. Specifically, it recommends the removal of all seven proposed turbines located on Bloch Hill east of the minor road (turbines T14-21) as well as the removal of the most southerly, low-lying turbine (turbine T13). It considers this additional design mitigation would reduce the effects of the Original Scheme on the setting of Langholm seen from the higher ground to the east as well as visual effects to receptors on higher ground to the north and east and on farmland to the south. It also considers this additional design mitigation would make the proposed development appear as a more proportionate extension to the operational Solwaybank Wind Farm.

Proposed Design Amendments

In response to the advice from DGC's external landscape consultant, the following design changes to the Original Scheme are now proposed:

- Removal of three wind turbines (turbines T19, T20 and T21); and
- Reduction in the height of three turbines (reducing the heights of turbines T16, T17 and T18 from 230m to 180m to blade tip, equivalent to a 22% decrease in height).

As a result of the removal of turbines T19, T20 and T21, approximately 1,700 m of proposed access track which was proposed to serve these turbines is no longer required. The associated turbine foundations and crane hardstanding areas for theses turbines are also no longer required. It is therefore proposed that these infrastructure elements also be removed.

The proposed amended site layout (herein after referred to as the 'Revised Scheme') is shown on **Figure 1.3A**, found in **Appendix 2**.

It is considered that the removal of the three easterly turbines will reduce the extent of encroachment across Bloch Hill east of the minor road and further improve the relationship between the proposed development and Solwaybank Wind Farm. The proposed reduction in height of the three turbines will further reduce the visual effect of the remaining turbines at the foot of Bloch Hill. Their reduction in height will also reduce the perception of foreshortening, thereby achieving a more balanced relationship with other turbines and the horizon.

Whilst it is acknowledged that DGC's external landscape consultant's response [**Document DGC2**] considers that more a 'notable' reduction of landscape and visual impacts could be achieved through additional turbine removal and/or reductions in turbine heights, for the reasons discussed later it is considered that the benefits of retaining these turbines and not reducing their height is preferable in the context of their contribution towards climate change and renewable energy targets.

Renewable Energy Generation Benefits

As a result of the proposed design changes, the expected renewable energy generation and the contribution that the proposed development will make towards reducing greenhouse gas emissions will decrease as follows:

- **Expected renewable energy generation**.

  Based upon a nominal installed capacity of 6 MW for each turbine, the generational capacity of the proposed development is expected to decrease from 126 MW for the Original Scheme to 108 MW for the Revised Scheme.

The annual generation from the proposed development is expected to decrease from 343,932 megawatt-hours (MWh) of renewable electricity per year for the Original Scheme[2] to 294,799 MWh per year for the Revised Scheme[3].

Based upon these predicated annual generational figures, the number of UK households that the proposed development will provide renewable energy to each year will decrease from approximately 106,185 UK households per annum for the Original Scheme to 91,015 UK households per annum for the Revised Scheme[4].

- **Expected carbon dioxide emissions.**

  Each unit of renewable electricity generated by the proposed development will displace a unit of conventionally generated electricity, thereby displacing carbon dioxide (CO_2) emissions.

  Based upon the expected annual electricity generation figures presented above, the amount of CO_2 emissions that the proposed development is expected to displace will decrease from approximately 150,298 tonnes of CO_2 emissions per year for the Original Scheme to 128,827 tonnes per year[5].

  Over its proposed 50-year operational life, the expected tonnes of CO_2 emissions displaced is expected to decrease from 7,514,906 tonnes for the Original Scheme to 6,441,348 tonnes for the Revised Scheme.

Socio-Economic Benefits

The Applicant is committed to the provision of community benefits and will provide £5,000 per MW per year during the operational life of the proposed development, reflective of current Scottish Government best practice guidelines. As a result of the reduction in the installed capacity of the proposed development from the proposed design changes, the community benefit fund would reduce from £630,000 annually for the Original Scheme to £540,000 annually for the Revised Scheme. Over its proposed 50-year operational life, the total community benefit fund would decrease from £31.5 million to £27 million.

The proposed development will also be liable for non-domestic rates, the payment of which will contribute to public sector finances. As a result of the reduction in the installed capacity of the proposed development, it is expected that the non-domestic rates contribution would decrease from approximately £1,342,530 per annum (2025 prices) for the Original Scheme to approximately £1,150,740 per annum for the Revised Scheme.

Based on the Original Scheme, it was estimated that the proposed development would result in:

- an estimated total capital expenditure (CAPEX) of up to £111 million, and that Dumfries and Galloway could secure contracts worth £10 million, the South of

[2] Annual renewable energy generation for the Original Scheme calculated as follows: 126,000 kilowatts kW x 8,760 hours/year x 0.3116 (capacity factor) = 343,931,616 kilowatt hours (kWh) or 343,932 megawatt hours (MWh)

[3] Annual renewable energy generation for the Revised Scheme calculated as follows: 108,000 kilowatts kW x 8,760 hours/year x 0.3116 (capacity factor) = 294,798,528 kWh or 294,799 MWh.

[4] Calculated from the most recent statistics from Department for Energy Security and Net Zero (DESNZ) showing that annual GB average domestic household consumption is 3,239 kWh (as of January 2024, updated annually).

[5] Calculated using DESNZ's "all non-renewable fuels" emissions statistic of 437 tonnes of carbon dioxide per GWh of electricity supplied in the Digest of UK Energy Statistics (July 2004) Table 5.14 ('Estimated carbon dioxide emissions from electricity supplied').

Scotland could secure contracts worth £12 million in spending and Scotland as a whole £36 million in contracts.

- an estimated 90 job years in Dumfries and Galloway, 110 job years in the South of Scotland and 460 job years in Scotland during construction.
- Boost the local economy by approximately £7 million gross value added (GVA), the South of Scotland economy by approximately £8 million GVA and the economy of Scotland by £32 million GVA during the construction.
- 10 full time equivalent jobs in Dumfries and Galloway, 10 full time equivalent jobs in the South of Scotland and 30 full time equivalent jobs in Scotland during the operational phase.

As a result of the removal of three turbines and their associated infrastructure, there would be a reduction in the region of 15% in the total expenditure and number of job opportunities for the Revised Scheme.

Aviation Lighting

A reduced aviation lighting scheme was agreed with the CAA for the Original Scheme which removes the requirement for tower lighting and avoids the need for every perimeter wind turbine to be lit. This agreed lighting scheme only requires 14 of the 21 turbines proposed for the Original Scheme to be lit with a medium intensity 2000 candela steady red light.

As a result of the removal of turbines, the amended lighting scheme for the Revised Scheme would comprise:

- 1 no. medium intensity steady red (2000 candela) light mounted on the nacelles of 12 of the 18 proposed wind turbines (turbines T1, T2, T5, T6, T7, T8, T10, T13, T14, T15, T17 and T18) automatically dimmed to 10% of peak intensity (200 candela) when visibility is in excess of 5 km; and
- a second 2000 candela light on the nacelles of the above wind turbines to act as alternates in the event of a failure of the main light.

Additional Information

Except for landscape and visual impacts, it is considered that there would be no changes to the significance of effects identified for the Original Scheme in the EIA Report because of the design changes proposed for the Revised Scheme.

A Landscape and Visual Technical Note [**Document APP1**] is provided as **Appendix 3** to this letter which provides:

- A review of the potential for any new or different significant landscape and visual effects because of the proposed changes for the Revised Scheme compared to those that were assessed for the Original Scheme in **Chapter 5: Landscape and Visual Impact Assessment** of the EIA Report. This review is supported by updated ZTV's and wirelines based upon the Revised Scheme layout.
- A review of the potential for any new of different impacts upon residential visual amenity because of the proposed changes for the Revised Scheme compared to those that were assessed for the Original Scheme in **Technical Appendix 5.3 Residential Visual Amenity Assessment** of the EIA Report. This review is supported by additional wirelines based upon the Revised Scheme layout.

Reference is made to the conclusions of the Landscape and Visual Technical Note in assessing the acceptability of the Revised Scheme against planning policy below.

Planning Assessment Review

The Application was supported by a Planning Statement which provided an assessment of the Original Scheme against planning policy and other relevant material considerations.

A Planning Statement Addendum was subsequently submitted in May 2023. This provided an assessment of the Original Scheme in relation to new national planning policy and guidance and other relevant material considerations approved and published after the Application had been submitted.

The purpose of this review is to provide an updated assessment of the Revised Scheme in relation to current Development Plan policy and other relevant material considerations. As the primary impact of the design changes proposed for the Revised Scheme is on landscape and visual impacts, the focus of this review is on those policies relating to these matters and the consideration of their acceptability on the overall planning balance.

The Development Plan for the proposed development comprises National Planning Framework 4 (NPF4) (2023) and the Dumfries and Galloway Local Development Plan 2 (LDP2) (2019). Whilst the Development Plan is not afforded primacy for the determination of applications made under Section 36 of the Electricity Act, it is nevertheless a key material consideration that should be given substantial weight in the decision-making process.

National Planning Framework 4

The proposed development is in a part of Scotland where NPF4 promotes renewable energy generating infrastructure (South of Scotland). The nature and scale of the proposal (over 50 MW capacity) means that it would be national development under the category 'Strategic Renewable Electricity Generation and Transmission Infrastructure'.

Policy 1: Tackling the Climate and Nature Crisis

The intent of NPF4 Policy 1 is to encourage, promote and facilitate development that addresses the global climate emergency and nature crisis. The policy outcome is identified as the delivery of zero carbon, nature positive places.

NPF4 Policy 1 states "*when considering all development proposals significant weight will be given to the global climate and nature crises*."

As previously outlined in the Planning Statement Addendum, the proposed development can make significant contributions towards both the global climate emergency and the nature crises through the generation of renewable energy and the proposed peatland enhancement. Whilst the removal of turbines and reduction of turbine heights proposed for the Revised Scheme will result is some reduction to the amount of renewable energy that will be generated, it will still result in a positive and valuable contribution towards addressing the climate and nature crises and should be given significant weight in the determination of this Application.

Since the Planning Statement Addendum was submitted, the Climate Change Committees most recent progress reports to the Scottish and UK Parliaments have highlighted the likely failure of both Scotland and the UK to meet their interim greenhouse gas emission reduction targets for 2030, and the urgency of action now needed to meet Scotland's 2045 and the UK's 2050 net zero targets.[6]

In the Climate Change Committees July 2024 progress report to the UK Parliament, the committee stated that "*only a third of the emissions reductions required to achieve the 2023*

[6] The Climate Change Act 2008 (2050 Target Amendment) Order 2019 requires the UK must achieve net-zero greenhouse gas emissions by 2050, compared to 1990 levels. In Scotland, the Climate Change (Emissions Reduction Targets) (Scotland) Act 2019 commits Scotland to achieving net-zero greenhouse gas emissions by 2045, five years ahead of the UK-wide target.

target are currently covered by credible plans" and that "*now only six years away, the country is not on track to hit this target."* [7]

Similarly, the Climate Change Committees March 2024 progress report to the Scottish Parliament identified that Scotland had missed eight of its past 12 annual targets and looks set to miss it's 2030 interim target. It states that the "*Scottish Government is failing to achieve Scotland's ambitious climate goals*" and that "*current overall policies and plans in Scotland fall far short of what is needed to achieve the legal targets under the Scottish Climate Change Act*." It believes that the "*acceleration required in emissions reduction to meet the 2030 target is now beyond what is credible...given the pace at which supply chains and investment would need to develop*." [8]

Despite not currently being on track to meet their 2030 interim targets, both the UK and Scottish Governments have recently reiterated their commitments towards 2045 and 2050 net zero targets.

The Labour Party's 2024 general election manifesto stated that the "*climate and nature crisis"* was the "*greatest long term global challenge*." [9] One of Labour's 'five missions to rebuild Britain' in the manifesto was to make Britain "*a clean energy superpower to cut bills, create jobs and deliver security with cheaper, zero-carbon electricity by 2030, accelerating to net zero".* More recently, the UK Government reiterated its commitment to achieving net zero by 2050 in a statement on North Sea energy repeated in the House of Lords on 12 March 2025. Baroness Blake of Leeds, a government whip in the House of Lords, stated "*the Government remained committed to achieving the UK's national determined contributions (NDCs), carbon budget six and net zero by 2050*."

In a statement to the Scottish Parliament in April 2024, Net Zero Secretary Màiri McAllan stated "*The race to net zero is one that we must all win and I want to begin by affirming this Government's unwavering commitment to ending our contribution to global emissions by 2045 at the latest*."

Overall, as evidenced through their continued commitment towards net zero, it is concluded that the seriousness of climate change, its potential effects and the need to cut carbon dioxide emissions remain a priority of both the UK and Scottish Government. However, the likely failure of Scotland and the wider UK to meet interim emissions targets for 2030 highlight the ever-increasing scale and urgency of action needed to meet Scotland's 2045 and the UK's 2050 net zero targets with a rapidly increased scale and pace of renewable energy deployment central to achieving this. According to the Climate Change Committee's advice for Scotland as part of its recently published Seventh Carbon Budget, the combined capacity of offshore wind, onshore wind, and solar in Scotland needs to more than triple from 15 GW in 2023 to 49 GW by 2035, increasing to 66 GW by 2024.[10]

When considering any further removal of turbines and/or reductions in turbine heights, very careful consideration therefore needs to be given to the detrimental impacts this would have on addressing the climate crisis and meeting net zero targets.

Policy 11: Energy

NPF4 Policy 11 is the main policy against which the proposed development should be assessed. The intent of NPF4 Policy 11 is to encourage, promote and facilitate all forms of renewable energy development, and the policy outcome is identified as the expansion of renewable, low carbon and zero emissions technologies. Through the delivery of an installed

[7] United Nations, 'For a livable climate: Net-zero commitments must be backed by credible action', accessed on 26 May 2025.
[8] Climate Change Committee, 'Progress in reducing emissions in Scotland: 2023 Report', 20 March 2024
[9] Labour Party, 'Labour Party manifesto 2024', June 2024, p 49.
[10] Climate Change Committee, 'The Seventh Carbon Budget', 26 February 2025.

capacity of approximately 108 MW, the Revised Scheme would make a positive and valuable contribution towards this policy intent.

Landscape and Visual Impacts

The most relevant part of NPF4 Policy 11 with regards to assessment of the Revised Scheme is paragraph (e) part (ii) which states that:

"*In addition, project design and mitigation will demonstrate how the following impacts are addressed: (ii) significant landscape and visual impacts, recognising that such impacts are to be expected for some forms of renewable energy. Where impacts are localised and/or appropriate design mitigation has been applied, they will generally be considered to be acceptable*."

It continues that:

"*In considering these impacts, significant weight will be placed on the contribution of the proposal to renewable energy generation targets and on greenhouse gas emissions reduction targets*."

As identified in the Planning Statement Addendum, unlike pre-NPF4, this policy now requires a decision maker to give good reason if the intention is to reject a proposal because of localised landscape and visual impacts. This acceptance of higher landscape and visual impact is reflective of the Scottish Government's Onshore Wind Policy Statement (2022) which recognises that the urgent need to increase renewable energy generation to address climate change and meet net zero targets will require taller and more efficient turbines which will inevitably change and have some negative effects on Scotland's landscapes.

This change in national planning policy position is accurately summarised by DGC in their committee report for Mid Mole Wind Farm (22/0394/S36), which states in paragraph 4.31 that:

"*NPF4 has effectively shifted the emphasis of such impacts in the overall planning balance, to one which is obliged to acknowledge that landscape and visual impacts, even if substantial and potentially harmful in this context, may require to be tolerated in the face of climate change, if they can be described to be localised and giving rise to acceptable, adequately mitigated wider adverse impacts*."

The LVIA assessment of the Original Scheme in **Chapter 5: Landscape and Visual Impact Assessment** of the EIA Report made the following conclusions:

- **Operational Effects on Landscape Character**

  Significant landscape effects would be limited to four landscape character types (LCTs) within 5 km of the proposed turbines, namely:

  - LCT175 *Foothills – Dumfries and Galloway* (in which the site is primarily located);
  - LCT172 *Upland Fringe – Dumfries and Galloway* (part of site lies within);
  - LCT177 *Southern Uplands - Dumfries and Galloway* (0.8 km north of site); and
  - LCT161 *Pastoral Valley – Dumfries and Galloway* (1.4 km east of site).

- **Operational Visual Effects**

  Significant visual effects would be limited to the receptor group encompassing *Local roads, residents and core paths between the A7, A6071 and A74(M)* (up to 1.8 km east, 9.0 km south and 8.0 km southwest from the site).

- **Operational Cumulative Impacts**

  The magnitude of cumulative effects on landscape character would be broadly similar to the effects on the Original Scheme alone, however there would also be significant

landscape effects upon LCT166 *Upland Glens – Dumfries and Galloway (3.5km northeast of site)* as a result of the addition of the proposed Teviot Wind Farm and Faw Side Wind Farm.

Significant cumulative visual effects would be confined to the *A7, A6071 and A74(M)* (up to 1.8 km east, 9.0 km south and 8.0 km southwest from the site) and *Langholm, local core paths and hills* (2.3km, north-east) receptor groups.

Whilst DGC's external landscape consultant response [**Document DGC2**] broadly agrees with the conclusions of the LVIA Assessment of the Original Scheme, it does consider that it fails to highlight some additional important localised impacts as follows:

- **Operational Effects on Landscape Character**

  Considers that there may also be significant effects on other LCTs within 5 km of the site, including:

  - *LCT171 Flow Plateau (1.1 km south of site);* and
  - *LCT177 Southern Uplands – Dumfries and Galloway (3.2 km north-east of the site).*

- **Operational Visual Effects**

  Considers that there may also be significant visual effects on other receptor groups within 5 km of the site, including :

  - *Langholm, local core paths (2.3 km north-east)* and
  - *A7 and local hills north of Langholm (2.5 km – 4.5 km north-east).*

The assessment of the landscape and visual impacts of the Revised Scheme in the Landscape and Visual Technical Note [**Document APP1**] identifies that the proposed design changes would provide the following benefits:

- **Operational Effects on Landscape Character**

  Five LCTs to the north and east of the site would experience a reduction in landscape effects. This includes:

  - *LCT177 Southern Uplands - Dumfries and Galloway (0.8 km north of site);* and
  - *LCT161 Pastoral Valley – Dumfries and Galloway (1.4 km east of site)*

  which would reduce from a significant to a non-significant landscape effect.

- **Operational Visual Effects**

  There would be a reduction in visual effects on the *A7 and local hills north of Langholm* (2.5 km – 4.5 km north-east) receptor group, the level of significance reducing from Moderate (not significant) for the Original Scheme to Moderate-Slight (not significant) for the Revised Scheme.

Based on the LVIA for the Original Scheme, it is clearly demonstrated that the landscape and visual impacts of the proposed development would be localised in extent. Whilst DGC's external landscape consultant response considers that the LVIA for the Original Scheme fails to highlight some potentially significant additional localised effects, importantly it does not disagree with the overall conclusion of the LVIA that significant landscape and visual impacts would be localised.

As identified earlier, the Applicant has gone to significant effort at the pre-application stage to seek to mitigate the landscape and visual impacts of the proposed development. Although it is still considered that appropriate design mitigation had been applied to the Original Scheme, the Applicant is now willing to propose further design mitigation in response to the late advice from DGC's external landscape consultant. The assessment of the Revised

Scheme in the Landscape and Visual Technical Note demonstrates that this additional design mitigation would be beneficial in reducing the extent of localised significant landscape and visual effects yet further.

Whilst DGC's external landscape consultant response considers that even fewer and smaller turbines than that proposed for Revised Scheme could reduce the extent of significant localised landscape and visual effects more extensively, it needs to be acknowledged that avoidance of all significant landscape and visual effects is not the sole consideration in wind farm design. Instead, the acceptability of residual landscape and visual impacts arising from design choices needs to take into account other considerations, including for example the wider benefits that more and taller turbines bring in terms of maximising renewable energy generation. It is considered that the layout of the Revised Scheme successfully achieves this balance between renewable energy generation (to address climate change and meet renewable energy targets) and the need to protect landscape character and visual amenity.

Overall, it is therefore concluded that landscape and visual impacts of the Revised Scheme would be localised, and that appropriate design mitigation has been applied. The landscape and visual impacts should therefore be considered acceptable, and the Revised Scheme would comply with the requirements of NPF4 Policy 11(e) part (ii) in this regard.

Residential Visual Amenity

NPF4 Policy 11 paragraph (e) part (i) requires that project design and mitigation demonstrate how impacts on residential amenity are addressed.

The Residential Visual Amenity Assessment (RVAA) of the Original Scheme in **Technical Appendix 5.3** of the EIA Report took forward one property (Collin Cottage, approximately 1.05 km from the nearest proposed turbine) for detailed assessment. It concluded that this property would not suffer effects that exceed the residential visual amenity threshold.

Whilst not challenging the conclusions of the RVAA, DGC's external landscape consultant response [**Document DGC2**] requested that more detailed assessment and illustrating wirelines be provided for Collin Cottage and six other residential properties who residential visual amenity it considered may potentially be affected. This detailed assessment is provided in the Landscape and Visual Technical Note [**Document APP1**], the assessment also providing a review of the potential for any new or different impacts upon residential visual amenity for the Revised Scheme compared to those that were assessed for the Original Scheme.

The assessment of the residential visual amenity impacts of the Revised Scheme in the Landscape and Visual Technical Note concludes that there would be no changes to the conclusion of the RVAA for the Original Scheme, i.e. that no properties would suffer effects that exceed the residential visual amenity threshold.

Overall, it is therefore concluded that the Revised Scheme would not adversely impact upon residential visual amenity to a significant and unacceptable degree. It would therefore comply with the requirements of NPF4 Policy 11(e) part (i) in this regard.

Effects on Designated Landscapes

The Original Scheme was assessed as having localised significant adverse effects on limited parts of the Langholm Hills Regional Scenic Area (RSA), which engages NPF4 Policy 4(d).

NPF4 Policy 4(d) states that:

> "*Development proposals that affect a site designated as a local nature conservation site or landscape area in the LDP will only be supported where:*
>
> *i. Development will not have significant adverse effects on the integrity of the area or qualities for which it has been identified; or*

ii. *Any significant adverse effects on the integrity of the area are clearly outweighed by social, environmental or economic benefits of at least local importance*."

The LVIA assessment of the Original Scheme identified potentially significant operational effects on the Langholm Hills RSA located in close proximity (0.1km), north-east of the site. However, it concluded that there will be no direct effects on the RSA and that the proposed development would not compromise the key qualities and overall integrity of the RSA. DGC's external landscape consultant response [**Document DGC2**] supports this conclusion.

As would be expected, the assessment of the landscape and visual impacts of the Revised Scheme in the Landscape and Visual Technical Note **[Document APP1]** identifies there would be a reduction in landscape effect on the LCTs that comprise the Langholm Hills RSA as a result of the proposed design changes. It considers that effects on the Langholm Hills RSA located in close proximity (0.1km), north-east of the site would reduce to not significant.

It is therefore concluded that Revised Scheme complies with NPF Policy 4(d)(i). That aside, even if the integrity of the RSA was considered to be significant adversely affected, the benefits of the Revised Scheme in terms of climate change and renewable energy benefits would be of more than local importance and would satisfy the requirements of NPF4 Policy 4(d)(ii).

Dumfries and Galloway Local Development Plan 2

The lead policies for the determination of renewables and wind farm developments in LDP2 are Policy IN1: Renewable Energy and Policy IN2: Wind Energy. Both provide that DGC will support wind energy proposals that are located, sited and designed appropriately subject to acceptability against a range of considerations including their landscape and visual effects. They state that the acceptability of a project will be determined through an assessment of the details of the proposal including its benefits and the extent to which environmental and cumulative impacts can be addressed satisfactorily.

More detailed guidance on the considerations identified for Policy IN2 are provided in DGC's '*Wind Energy Development: Development Management Considerations Supplementary Guidance'* (2020).

For the reasons set out above in relation to NPF4, it is considered that the landscape and visual effects of the Revised Scheme are acceptable. It is therefore considered that they should also be considered acceptable in terms of LDP2 Policies IN1 and IN2.

LDP2 Policy NE2: Regional Scenic Areas sets out that development within, or which affects RSAs, may be supported where the Council is satisfied that the landscape character and scenic interest for which the area has been designated would not be significantly adversely affected or there is a specific locational need. As set out previously for NPF4 Policy 4, the proposed development would not compromise the overall integrity of the Langholm Hills RSA. It would therefore comply with LDP2 Policy NE2.

Planning Assessment Conclusions

For the reasons discussed above, it is concluded that the Revised Scheme complies with the requirements of NPF4 and LDP2 relating to landscape and visual matters.

Assessment of the proposed development in relation to other matters contained with NPF4 and LDP2 is provided in the Planning Statement and Planning Statement Addendum. Given that would be no other materially different environmental impacts other than landscape and visual impacts associated with the Revised Scheme, these assessments remain valid.

Overall Conclusions

The layout and deign of the Original Scheme included significant design mitigation to seek to ensure that the landscape and visual impacts of the proposed development were localised

and acceptable in planning terms. Whilst it was considered that the layout and design of the Original Scheme achieved this, through the proposed Revised Scheme further design mitigation is now proposed to seek to reduce the landscape and visual impacts of the proposed development to the point it is hoped that DGC also agree they are acceptable.

Whilst DGC's external landscape consultant's response advises that additional turbine removal and reduction in turbine heights beyond that proposed for the Revised Scheme would be beneficial, it is considered that such changes are unnecessary, disproportionate and insufficient grounds to justify a refusal of consent. Instead, it is considered that the benefits of retaining these turbines (and at their current height) in terms of their contribution towards renewable energy generation targets and greenhouse gas emissions reduction targets is preferable and clearly outweighs any adverse localised landscape and visual effects that have been identified.

I therefore respectfully now request this Application be determined on the basis of the Revised Scheme proposed. Should any additional information be required in support of the Revised Scheme, please do not hesitate to contact me.

Regards,

SLR Consulting Limited

Michael Fenny
Principal Planner

Appendix 1: Index of Supporting Information

Table 1: Index of Supporting Information

Reference	Document
DGC1	DGC's internal landscape architect response, September 2023.
DGC2	DGC's external landscape consultant response, December 2024.
APP1	Landscape and Visual Technical Note, May 2025.

Appendix 2: Figure 1.3A

Appendix 3: Landscape and Visual Technical Note