Fred. Olsen Renewables

natural power

Natural Power acting as lead consultants on behalf of Fred. Olsen Renewables.

Windy Standard I Repower

Volume 1: Non-Technical Summary

November 2022

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1. Introduction

An application has been made by Fred. Olsen Renewables Limited (The Applicant) to Scottish Ministers under Section 36 of the Electricity Act 1989 and under section 57(2) of the Town and Country Planning Act 1997 for consent to construct and operate Windy Standard I Wind Farm Repower (the Proposed Development). This Non-Technical Summary (NTS) has been produced in accordance with the Electricity Works (Environmental Impact Assessment) (Scotland) Regulations 2017 (as amended), hereafter referred to as the EIA Regulations. It accompanies an Environmental Impact Assessment Report (EIAR) which presents the results of the Environmental Impact Assessment (EIA) undertaken to establish the potential effects that the Proposed Development may create. As per Regulation 5(2)(e) of the Regulations, this NTS provides a non-technical summary of the following:

(a) a description of the Proposed Development comprising information on the site, design, size and other relevant features of the development;

(b) a description of the likely significant effects of the Proposed Development on the environment;

(c) a description of the features of the Proposed Development and any measures envisaged in order to avoid, prevent or reduce and, if possible, offset likely significant adverse effects on the environment; and

(d) a description of the reasonable alternatives studied by the developer, which are relevant to the Proposed Development and its specific characteristics, and an indication of the main reasons for the option chosen, taking into account the effects of the development on the environment.

1.1. The Applicant

Fred. Olsen Renewables Limited (FORL) has been developing and operating wind farms since the mid 1990's and is fully committed to the Scottish and UK renewables energy generation market, with an operational portfolio generating capacity of 529.7 MW. In the UK, FORL have a total of eight operational wind farms.

FORL is a leading developer, owner and operator of renewable energy assets, primarily onshore wind farms. The Applicant has been developing and operating wind farms in the UK since the mid 1990's demonstrating long term commitment to the renewable energy generation market in the UK, Scotland and the north-east of Scotland in particular.

With over twenty-five years' experience in consenting, developing and operating wind farms, FORL is one of very few developers that take a project all the way from initiation and development, through to operation.

FORL was the first developer to bring forward community benefit in Scotland. To date, FORL has made available over £6 million to eligible communities surrounding its wind farms and is substantially increasing this investment as new projects come online.

1.2. Consultants

Natural Power Consultants Limited (Natural Power) has been appointed to coordinate and produce the EIAR and associated application documentation.

Natural Power has been providing expertise to the renewable energy industry since the company was formed in 1995 and is one of the UK's leading renewable energy and infrastructure consultants. As well as development and EIA services, Natural Power also provide expert advice and due diligence consultancy, site construction management, and site operation and maintenance.

Natural Power currently employs over 450 people working full time providing renewable energy services nationally and internationally. Natural Power's office in Dumfries and Galloway, where this project is largely managed, currently employs approximately 100 renewable energy experts.

Testimony to Natural Power's experience and ongoing commitment to competency and continual improvement, its Planning and Environment depart is accredited by the Institute of Environmental Management and Assessment and EIAs prepared by Natural Power display the IEMA quality mark. In addition, Natural Power also operates in formally accredited health and safety (ISO 45001), environmental (ISO 14001) and quality (ISO 9001) management systems.

Natural Power has also commissioned the following specialist consultants (Table 1.1) to provide professional advice for specific assessments in relation to the EIA of the proposed development.

Table 1.1: Specialist consultants involved in the production of this Environmental Impact Assessment Report

Consultants		
Cultural Heritage Consultancy		
AMS Consultancy	York Hub, Popeshead Court Offices, Peter Lane, York, YO1 8SU	Tel: 01904 404849 Contact: Steve Lancaster
Landscape and Visual Consultancy		
Optimised Environments (OPEN)	2nd Floor, 2 Lister Square, Quartermile Two, Edinburgh, EH3 9GL	Tel: 0131 221 5920 *Contact: James Welsh*
Noise Consultancy		
TNEI Services Ltd	Milburn House, Dean Street, Newcastle Upon Tyne, NE1 1LE	Tel: 0191 2111404 *Contact: Gemma Clarke*
Forestry Consultancy		
DGA Forestry	DGA Forestry Lochanhead Wood, Lochanhead, Dumfries, DG2 8JB	Tel: 01387 730 634 *Contact: Sandy Anderson*
Aviation Consultancy		
Aviatica Group Ltd	Reservoir House, Gladhouse, Midlothian, EH23 4TA	Tel: 0771 044 7378 *Contact: Malcolm Spaven*
Socioeconomics and Tourism		

Consultants		
Biggar Economics	Pentlands Science Park, Penicuik EH26 0PZ	Tel: 0131 514 0850 *Contact: Graeme Blackett*

1.3. Terminology

- The 'Proposed Development': the construction and operation of turbines and all associated infrastructure required for Windy Standard I Wind Farm Repower to include the decommissioning and restoration of Windy Standard I as part of the construction phase;
- The 'Proposed Development Area': all land within the Windy Standard I Repower application site boundary as shown edged red on EIAR Figure 1.2 in Volume 3;
- The 'Applicant': Fred. Olsen Renewables Limited; and
- The "Windy Standard Complex": Windy Standard I (operational), Windy Standard II (operational) and Windy Standard III (consented).

2. Environmental Impact Assessment Report

The EIAR has been prepared in line with the EIA Regulations. The EIAR reports the findings made in the EIA of the Proposed Development. The scope of the EIA was the subject of a formal scoping opinion from the Scottish Government Energy Consents Unit (ECU) on behalf of Scottish Ministers. This included input from consultees including Scottish Environmental Protection Agency (SEPA), NatureScot (formerly known as Scottish Natural Heritage (SNH)) and Historic Environment Scotland (HES).

During the EIA process, site visits, surveys and desktop assessments, in line with relevant guidance, were carried out to ascertain the potential impacts of the Proposed Development on the environment and mitigation measures to be implemented. A review of planning and other relevant policies was also undertaken to inform the assessment process and ensure the Proposed Development adequately considered local and national policy. The EIAR follows the structure presented in Table 2.1 below. Where relevant each EIAR chapter considers the baseline environment, the likely significant effects for each phase of the development, including the decommissioning and restoration of Windy Standard I, cumulative impacts and any required mitigation.

Table 2.1: EIAR Structure

Volume	Heading	Description
1	Non – Technical Summary	Provides a high-level summary of the EIA's results in terms that can be understood by a layperson.
2	EIAR Chapter 1: Introduction	Presents the Proposed Development and provides a brief overview of the Applicant and the EIAR.
2	EIAR Chapter 2: Legal and Policy Context	Identifies the energy and land use policy and outlines the need for the Proposed Development and its benefits within the context of international climate change

Volume	Heading	Description
		agreements and UK and Scottish renewable energy policy.
2	EIAR Chapter 3: Approach to EIA	Presents a methodology for environmental design and assessment of the Proposed Development through gathering baseline environmental data, mitigation of impacts during site design, final assessment of the significance of residual environmental and human effects of the proposal.
2	EIAR Chapter 4: Site Design and Design Evolution	Provides a detailed description of the site selection process for the proposed site. This chapter also discusses the design evolution process and mitigation measures that were introduced at the site selection and design stage to reduce environmental impacts.
2	EIAR Chapter 5: Project Description	Provides a detailed description of the Proposed Development including details of the decommissioning of Windy Standard I, construction, operational and decommissioning arrangements.
2	EIAR Chapter 6: Landscape and Visual	Provides an assessment of the Landscape and Visual Impacts (LVIA) of the Proposed Development and cumulative LVIA.
2	EIAR Chapter 7: Cultural Heritage Assessment	Considers the potential impacts of the Proposed Development upon cultural heritage assets.
2	EIAR Chapter 8: Ornithology Assessment	Describes the ornithological interest at the Proposed Development and assesses the predicted effects on these interests.
2	EIAR Chapter 9: Ecology Assessment	Provides an overview of the baseline ecological conditions relating to the habitats and (non-avian) fauna present within the Proposed Development area and immediate surrounding environment.
2	EIAR Chapter 10: Hydrology, Geology and Hydrogeological Assessment	Assesses the impacts on the hydrological, geological and hydrogeological environment at the Proposed Development including private water supplies and peat.

Volume	Heading	Description
2	EIAR Chapter 11: Forestry Assessment	Assesses the potential impacts on the changes to the structure of the woodlands at the Proposed Development.
2	EIAR Chapter 12: Traffic and Transport Assessment	Assesses the effects due to transport and access resulting from the decommissioning of Windy Standard I, construction, operation and decommissioning of the Proposed Development.
2	EIAR Chapter 13: Infrastructure and Aviation	Assesses the potential impact on aviation, Ministry of Defence interests, communication operations and existing site infrastructure. It demonstrates the consulting process undertaken and outlines mitigation where it is deemed necessary. This chapter also considers telecommunications.
2	EIAR Chapter 14: Noise	Assesses the potential noise effects of the Proposed Development.
2	EIAR Chapter 15: Socio-economics	Assesses the predicted socio-economic and tourism impacts of the Proposed Development on local, regional and national levels.
2	EIAR Chapter 16: Climate Change	Assesses the environment effects of the Proposed Development through a carbon calculator.
2	EIAR Chapter 17: Synergistic Effects and Summary of Mitigation and Residual Effects	Summarises the findings of the Environmental Impact Assessment presented in the EIAR chapters described above. This chapter also includes synergistic effects.
3	Figures	EIAR Figures and Visualisations
4	Technical Appendices	Provides additional supporting documents and data which inform the EIA.

Source: Natural Power

The application is also supplemented by an accompanying Planning Statement and a Pre-Application Consultation (PAC) Report.

- Copies of the full EIAR and NTS can be obtained from the Applicant through communities@fredolsen.co.uk NTS in printed form: Free
- EIAR in printed form: £1,250
- EIAR in PDF format on CD or Memory Stick: £15

An electronic copy (accessible free of charge) of the EIAR can also be found on the Fred. Olsen Renewables website: Fred. Olsen Renewables (fredolsenrenewables.com)

3. Overview of the Proposed Development

Figure 1.1 (Volume 3 of the EIAR) shows the location and extent of the Proposed Development in a regional context. The Proposed Development is located within Carsphairn Forest, near Carsphairn in Dumfries and Galloway and will replace the existing Windy Standard I Wind Farm.

The application is for a wind farm comprising of up to 8 wind turbines with a blade tip of up to 200 m. Therefore, the Proposed Development has a total generation capacity of approximately 49.6 MW. The operational life for the wind farm is 35 years.

The application also includes associated infrastructure, including;

- Turbine infrastructure including turbine foundations, external transformer, crane pads and hardstand areas;
- Micro-siting allowance of turbines and associated infrastructure of up to 90 m;
- Existing distribution and transmission substations, with their associated control buildings and compounds;
- Minor upgrades to approximately 14 km of existing access tracks:
- Batching plant;
- Utilisation of original access tracks to construct of approximately 7.3 km of new access tracks;
- Underground electricity cables;
- Signage;
- Temporary borrow pit areas;
- Temporary construction and storage compounds, laydown areas and ancillary infrastructure;
- Security gatehouse and parking area; and
- Drainage and drainage attenuation measures (as required).

The Proposed Development will include works to decommission and restore the Windy Standard I Wind Farm and It is intended that the Proposed Development will make use of some of the existing infrastructure on site and of the available capacity on the local transmission and distribution network with connection to the substations as shown on Figure 1.3: Site Layout (Volume 3).

Locations (subject to micro siting) and indicative dimensions of the proposed turbines are shown in Table 3.1.

Table 3.1 Indicative Turbine details and co-ordinates

Turbine Number	Easting	Northing	Maximum Tip Height (m)
1	260468	603941	200
2	260906	603460	200
3	262020	601682	200
4	261378	601477	200
5	260336	601915	200
6	260989	601705	200
7	261254	602883	200

Turbine Number	Easting	Northing	Maximum Tip Height (m)
8	261550	602260	200

Source: Natural Power

A more detailed description of the Proposed Development is provided in Chapter 5 of the EIAR.

4. Reasonable Alternatives

The Applicant is engaged in a continual search and assessment of potential wind farm sites throughout the UK to progress and develop wind farm applications. This search began in the mid 1990's and the process has yielded a number of sites which have progressed to operational wind farms.

As the original Windy Standard I Wind Farm is approaching end of its operational life, the Applicant started to consider the possibility of repowering the site. The Applicant approached the repower with similar methods they would usually do for a new site. This includes a rigorous site design process involving constraints mapping, site visits and continual review of technical, environmental and planning considerations.

The Proposed Development Area passed all initial stages of site design.

Initial layouts for the Proposed Development were informed by the studies of the operational Windy Standard I, Windy Standard II and the consented Windy Standard III. The Proposed Development Area was identified as a strong candidate for potential development, and met a number of key criteria including:

- Good, estimated wind speeds;
- Good separation distance from dwellings;
- Good separation distance from cultural heritage assets;
- In line with Dumfries Galloway Council Local Development Plan 2 guidance[1];
- Close proximity to an existing and viable grid connection;
- Potential to use existing infrastructure (e.g. access tracks), as far as practical;
- Topography of the Proposed Development Area is compatible with the construction of a commercial scale wind farm;
- Not within ecological designations of international or national importance;
- Suitable land area to accommodate generating capacity;
- No national designations; and
- In relation to onshore wind, SPP Table 1 'Spatial Frameworks', the Proposed Development is located in a Group 3 Area: areas with potential wind farm development (please see Figure 2.1, Volume 3 of the EIAR).

Initial feasibility assessments indicated that there was opportunity for further wind energy development in Carsphairn Forest at the Proposed Development site when the current turbines get decommissioned.

[1] Dumfries and Galloway Council [2019]. Local Development Plan [online] available at: Adopted Local Development Plan 2 (dumgal.gov.uk). Accessed 07/06/2022.

4.1. Site Design

The Proposed Development forms part of the Windy Standard Complex, which has been subject to survey work and monitoring, for different phases, through the 25 years since the original Windy Standard I became operational in 1995. As such, the Windy Standard Complex (the operational original Windy Standard I, Windy Standard II and the consented Windy Standard III) has been extensively covered by environmental surveys such as birds and other species, peat depths, archaeology and other matters of interest.

The data gathered enabled the team to investigate seven different design iterations before settling on the final design which maximises the efficiency of the Proposed Development whilst limiting the potential environmental impacts. The Proposed Development Area has also been assessed by checking it against a number of strategic constraints. Image 1 (Figure 1.3 of the EIAR) illustrates the site location and layout of the Proposed Development Area, presented below.

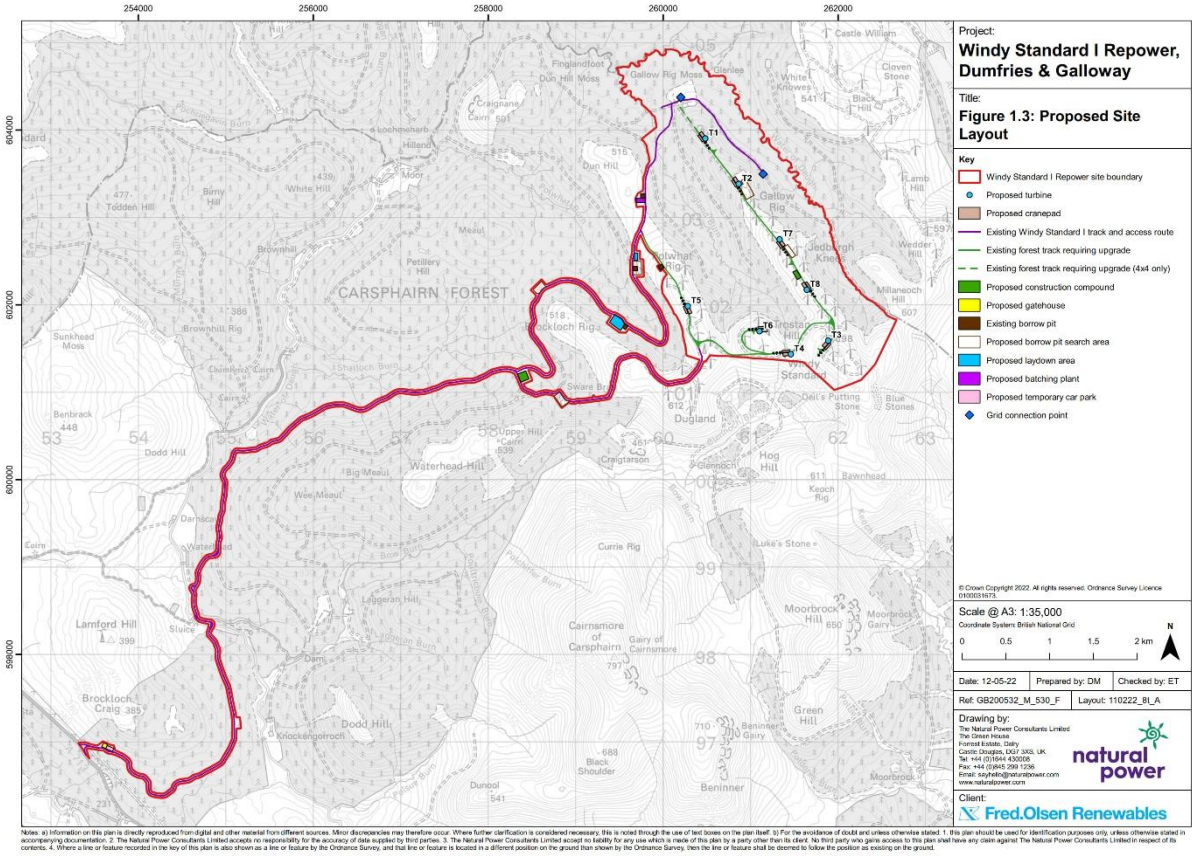

Image 1: Site layout, reproduced from Figure 1.3: Site Layout in Volume 3 of the EIAR

The Proposed Development has been in the design process for five years and the layouts have evolved iteratively; see Chapter 3: Site Design and Design Evolution of the EIAR for full details. The changes to the design have been influenced by several factors including potential environmental effects, planning policy, economics and stakeholder feedback.

The iterative design approach aimed as far as practically possible to avoid and then mitigate significant effects through careful siting and design of the Proposed Development. The design was repeatedly assessed and amended, balancing different environmental issues and consultee concerns made during early consultation. Before Scoping, many design options were presented (see Figures 4.1 - 4.5, of the EIAR) with both positive and negative attributes including the worst-case scenario of a 20-turbine development which was assessed in the initial Feasibility Assessment. This layout was likely to provide the most benefit in terms of electricity

generation, climate mitigation, supply chain and community benefit (£ per MW) but due cumulative effect of other windfarms in the area the Applicant believed there was potential to achieve an improvement to the existing baseline and demonstrate to statutory consultees that there will be a reduction in landscape and visual effects by simplifying the composition of turbines. After additional extensive survey work and further turbine layout reviews, a nine turbine layout was produced before proceeding to formal scoping in 2021.

Continuing the design and consultation process after the Scoping Opinion was received, the number of turbines further decreased from 9 to 8 with a blade tip height of up to 200 m, balancing the various site constraints and feedback with the scale of development required to be economically viable.

Image 1 contains a detailed final site turbine layout with associated infrastructure for the Proposed Development after design freeze. The EIAR outlines in detail how environmental matters and stakeholder feedback have influenced the process. Particularly prominent issues which affected the design include:

- Reducing potential landscape and visual effects by removing turbines and taking into account the cumulative design of the Windy Standard Complex;
- Ensuing utilisation of exiting on-site infrastructure, for example, the location of the turbines have been chosen to follow the existing Windy Standard I forest track to minimise the non-disturbed land being used for track upgrades;
- Minimising impacts on watercourses and the aquatic environment; and
- Minimising effects on forestry felling.

4.2. Planning Policy

4.2.1. Design Considerations

According to Scottish Planning Policy criteria, the Proposed Development is located mostly in an 'Area with Potential for Wind Farm Development' (Scottish Planning Policy (SPP) Group 3). Figure 2.1 (Volume 3 of the EIAR) shows the turbines within the Proposed Development are all located within a Group 3 area. In addition, Local Development Plan (LDP) policy IN2: Wind Energy considers the extent of any cumulative detrimental landscape or visual impact or impacts on existing patterns of development from two or more wind energy developments. This was considered in the design process and turbines were removed to limit and improve visual impact to this region. Therefore, the Proposed Development has planning policy from the current SPP (see below for reference to the draft National Planning Policy Framework 4 ("NPF4")).

4.2.2. Policy Context

4.2.2.1. International Climate Policy

The UK is driven by international co-operation to cut the emission of greenhouse gas emissions, as a means of combating climate change. This includes the 'Paris Agreement' (United Nations, 2015)[2], established through the 21st session of the Conference of Parties ('COP 21'). Ratified in the UK on 17th November 2016, the Paris Agreement sets out the ambition of holding the increase of global average temperature to 'well below 2°C' and pursuing efforts to limit temperature increase to 1.5°C. The COP26 'Glasgow Climate Pact'3 published in 2021

[2] United Nations (2015) Conference of Parties ('COP 21'). [Online] Available at . https://unfccc.int/process-and-meetings/the-paris-agreement/the-paris-agreement [Accessed 21st February 2022]

[3] United Nations (2021) The COP26 'Glasgow Climate Pact'. [Online] Available at https://unfccc.int/process-and-meetings/the-paris-agreement/the-glasgow-climate-pact-key-outcomes-from-cop26 [Accessed 21st February 2022]

reaffirms the Paris Agreement temperature goal of holding the increase in the global average temperature to well below 2°C above pre-industrial levels and pursuing efforts to limit the temperature increase to 1.5 °C above pre-industrial levels.

The United Nations Emissions Gap Report 2021[4], is the twelfth in a series of reports comparing where greenhouse gas emissions are heading, against where they need to be and highlighting the ways to close the gap. This latest report shows that new national climate pledges combined with other mitigation measures put the world on track for a global temperature rise of 2.7°C by the end of the century. That is well above the goals of the Paris Agreement and the Glasgow Climate Pact and would lead to catastrophic changes in the Earth's climate. To keep global warming below 1.5°C this century, the aspirational goal of the Paris Agreement, this report states that the world needs to halve annual greenhouse gas emissions in the next eight years.

4.2.2.2. Domestic Climate Policy

The Scottish Government is a devolved administration and is responsible for climate change and energy issues in Scotland. In line with the UK's agreement with the Kyoto Protocol and the Paris Agreement, the Scottish Government brought into force:

- The Climate Change (Scotland) Act 2009[5];
- The Scottish Energy Strategy 2017[6]; and
- The Scottish Onshore Wind Energy Policy Statement 2017[7].

The Scottish Energy Strategy includes the aim to meet 50% of Scotland's whole energy demand from renewables by 2030.

The document outlines a vision to drive Scottish Energy Production for 2050 and stresses the importance of renewable energy in achieving a low carbon economy in Scotland.

More explicitly the Scottish Onshore Wind Energy Policy Statement sets out the role of onshore wind in meeting these targets. The Scottish Onshore Wind Policy Statement is being reassessed at present and undergoing consultation to update and produce a re draft in 2022.

Since the publication of these landmark documents, considerable additional weight has been afforded to the matters raised by them through the publication of amongst other things:

- The Climate Change Plan 2018 (and 2020 update)[8];
- The Climate Change (Emission Reductions Targets) (Scotland) Act 2019 setting the target for net zero carbon emissions by 2045[9];

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[4] Union Nations (2021) United Nations Emissions Gap Report 2021. [Online] Available at https://www.unep.org/resources/emissions-gap-report-2021 [Accessed 21st February 2022]

[5] Scottish Government (2009) The Climate Change (Scotland) Act 2009. [Online] Available at https://www.legislation.gov.uk/asp/2009/12/contents [Accessed 08/06/2022]

[6] Scottish Government (2021) The Scottish Energy Strategy. [Online] Available at https://www.gov.scot/publications/scottish-energy-strategy-future-energy-scotland-9781788515276/ [Accessed 08/06/2022]

[7] Scottish Government (2017) The Onshore Wind Policy Statement. [Online] Available at https://www.gov.scot/publications/onshore-wind-policy-statement-9781788515283/ [Accessed 08/06/2022]

[8] Scottish Government (2018) The Scottish Climate Change Plan [Online] Available at https://www.gov.scot/publications/scottish-governments-climate-change-plan-third-report-proposals-policies-2018/ [Accessed 08/06/2022]

[9] Scottish Government (2019) The Climate Change (Emissions Reduction Targets) (Scotland) Act 2019. [Online] Available at https://www.legislation.gov.uk/asp/2019/15/enacted [Accessed 08/06/2022]

- The 'Progress in Reducing Emissions in Scotland 2021 Report to Parliament' (Committee on Climate Change, October 2021)[10];
- The Sixth Carbon Budget, Climate Change Committee, December 2020[11].

In August 2021, The Scottish Government and the Scottish Green Party Parliamentary Group created a shared draft policy programme – the Bute House Agreement – that would see the parties working together to achieve objectives relating to the climate emergency over the next five years. It details commitments to investing at least £1.8 billion over this period in energy efficiency and renewable heating and creating a bigger focus on green jobs. These documents are the main drivers in steering Scotland towards a low-carbon economy and meeting international targets on climate change and renewable energy generation.

4.2.2.3. Planning Policy

National planning policy of relevance to the determination of the Proposed Development currently comprises the National Planning Framework for Scotland 3 (NPF3) (2014)[12] and Scottish Planning Policy (SPP) (2014)[13]. In addition, a Draft National Planning Framework 4 (NPF4) (2021)[14] was published for consultation in November 2021. At the time of writing this document has yet to be approved by the Scottish Government.

NPF3 sets out a strategy for Scotland's development over the next 20 to 30 years, providing a national context for development plans and planning decisions, to inform wider programmes of government, public agencies, and local authorities. NPF3 confirms the importance of renewable energy to Scotland's energy mix and highlights upgrades to the electricity transmission system infrastructure that are needed to facilitate this development. The vision for Scotland portrayed in NPF3 is that of a successful, sustainable place, a low-carbon place, a natural resilient place and a connected place. These visions put emphasis on the aspirations of Scotland being a leader in low-carbon energy generation, both onshore and offshore, to create a more energy efficient economy with fewer greenhouse gas emissions. The target is to generate the equivalent of Scotland's gross annual electricity consumption from renewable sources by 2020. The 2015 target of 50% was exceeded and recent data has stated that renewable electricity generation has risen from 90% in 2019 and is now equivalent to approximately 97% of Scotland's gross electricity consumption in 2020[15].

SPP was published in June 2014 (Scottish Government, 2014) and is a statement of Scottish Government policy on land use planning. SPP emphasises the importance of tackling climate change and, in particular, the need to reduce greenhouse gas emissions. SPP is a material consideration of relevance to the Proposed Development. The following paragraphs set out the policy issues which are most relevant to the Proposed Development.

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[10] Committee on Climate Change (2021) The 'Progress in Reducing Emissions in Scotland 2021 Report to Parliament'. [Online] Available at https://www.theccc.org.uk/publication/progress-reducing-emissions-in-scotland-2021-report-to-parliament/ [Accessed 08/06/2022]

[11] Committee on Climate Change (2020) The Sixth Carbon Budget. [Online] Available at https://www.theccc.org.uk/publication/sixth-carbon-budget/ [Accessed 08/06/2022]

[12] Scottish Government (2014) National Planning Framework for Scotland 3. [Online] Available at https://www.gov.scot/publications/national-planning-framework-3/ Accessed 21st February 2022

[13] Scottish Government (2014) Scottish Planning Policy. [Online] Available at https://www.gov.scot/publications/scottish-planning-policy/ . Accessed 21st February 2022

[14] Scottish Government (2021) A Draft National Planning Framework 4. [Online] Available at https://consult.gov.scot/local-government-and-communities/draft-national-planning-framework-4/ Accessed 21st February 2022

[15] Available at https://www.scottishrenewables.com/our-industry/statistics (last accessed 26/02/2022)

In November 2021 the Scottish Government published its Draft Scotland 2045: NPF4. Only limited weight can be given to the polices in Draft NPF4 at this stage, given it is a consultation document only. When adopted NPF4 will replace both NPF3 and Scottish Planning Policy and will form part of the statutory Development Plan. Draft NPF4 continues to set a positive context for renewable energy developments embedded in NPF3 that will help achieve the legally binding net zero greenhouse gas emissions target by 2045 (with associated interim targets, including a 75% reduction by 2030 compared to 1990 levels).

4.3. Wind Resource

On-site wind resource is well known at the Proposed Development site and the wider Windy Standard Complex due to data from operational assets (the current Windy Standard I (WSI) and Windy II (WSII)) and on-site monitoring campaigns (Windy Standard III (WSIII). Long term wind speed estimates for the Proposed Development Area have been based upon data available from the operational Windy Standard I Wind Farm and supplemented by anemometer mast and LIDAR data, measured in parts of the Windy Standard Complex adjacent to the Proposed Development area.

Detailed assessments using Computational Fluid Dynamics (CFD) have given a good understanding of the wind flow regime surrounding the Proposed Development. A CFD model is one method that can be used in onshore wind to create a digital simulation that visualises the flow of fluids (wind) and the way they are affected by objects. Energy yield assessments have also been performed throughout the design process, indicating that the Proposed Development has the potential to deliver an economically viable wind energy development subject to further assessment.

4.4. Grid Connection

The wind farm must be connected to the National Grid network in order to deliver generated electricity where it is needed. Cables routed from the proposed turbines would be brought together via underground cables to the existing on-site substation that is connected to the grid.

4.5. Summary

The Proposed Development has been located in a suitable area for wind farm development following a site design process. The rigorous design evolution has taken place over several years through many changes which have reacted to environmental data gathered on the site, new policies, market dynamics and consultee responses. Through balancing the various site constraints with the scale of development required to be economically viable, the Applicant believes that the Proposed Development provides optimum use of the Proposed Development Area with respect to the potential renewable electricity generating capacity balanced against the potential environmental effects.

5. Likely Effects and Mitigation

This section of the NTS presents a summary of the likely significant effects of the Proposed Development and the measures taken or put forward to reduce the likely significant effects identified (mitigation).

5.1. Access (Public Road)

Most traffic related to the Proposed Development will be cars, vans and lorries which are suitable for use on the existing road network. Large turbine components, however, need to be removed from the site and delivered as an abnormal indivisible load (AIL) which is any load that cannot be broken down into smaller loads for transport, in particular the blades of the wind turbine. Extra-large lorries must be used for these AIL deliveries

and extensive assessment work is done on the proposed AIL delivery route to ensure that they can make all the turns and identify any road upgrades or alterations which might be needed.

Chapter 12: Traffic and Transport Assessment details the public road network proposed for the transportation of turbine components. The turbine delivery route would converge on the A713 and travel to site in a southerly direction. It is therefore proposed that the current preferred route for the major component deliveries is as follows:

- Loads would exit the docks and join Kings Inch Drive northbound;
- Loads would continue on Kings Inch Drive before turning left onto the M8 slip road;
- Loads would merge onto the M8 at Junction 25A and continue east before departing and performing a
- U-turn back onto the M8 westbound at the Seaward Street Interchange;
- Loads would diverge from the M8 onto the M77 and continue on the M77 / A77 southbound;
- Loads would exit the A77 at Bankfield Roundabout at join the A713 southbound; and
- Loads would continue on the A713 before turning left into the site access junction north of Brockloch.

Turbine component deliveries are anticipated to come from the King George V Docs in Glasgow.

Prior to the construction of the Proposed Development commencing, work will be undertaken for the decommissioning and restoration of the existing Windy Standard I wind farm which has come to the end of its life. The anticipated Heavy Goods Vehicles (HG) traffic generated by the decommissioning and restoration of the existing Windy Standard I wind farm does not exceed assessment thresholds identified in IEMA regarding the increase in traffic levels that are likely to affect the environmental conditions of the road. Accordingly this does not require to be taken forward for further assessment.

The condition of the public road along the access route and other roads would be surveyed and recorded prior to wind farm construction. Where required repair and maintenance work will be carried out on these roads during and following the construction period to rectify any identifiable damage which is directly attributable to the Proposed Development.

A Traffic Management Plan (TMP) will be approved by the local planning authority in consultation with Transport Scotland and Roads Authority and police prior to construction starting on the Proposed Development. This will detail any temporary changes to road furniture, timings of deliveries and the construction routes to minimise its impact on the road network. A Preliminary TMP is provided in Technical Appendix 12.2 of the EIAR.

The assessment of potential effects upon traffic and transport is provided in Chapter 12 of the EIAR. It concludes that, with the incorporation of suitable mitigation measures secured through a construction TMP, there will be **no significant traffic effects** associated with the Proposed Development. If the construction of the Proposed Development coincided with another wind farm, using the same transport routes, then communication with the other developer(s) would take place with the aim to mitigate any effects to a non-significant level.

5.2. Landscape and Visual

Landscape and visual considerations were taken on board at an early stage of the project as these were understood to be key to project progression. Chapter 6: Landscape and Visual considers these impacts. Whilst it is noted that opinion on wind farms and their visual effects varies and is subjective, for the purposes of assessment it has been assumed all visual effects are negative.

Significant effects on the local landscape and visual resource have been identified in the process of the LVIA, and these are described in full in Chapter 6 of the EIAR. In summary, the assessment has indicated that visual

effects may be significant up to a maximum of approximately 11 km away from the Proposed Development to the north of the site. It is important to note that the closer significant effects are assessed in relation to the current scenario of operational and under construction wind farms and will become not significant when wind farms that are currently consented but not yet constructed are taken into consideration. To the south, east and west, significant visual effects in relation to the current baseline of operational and under construction wind farms are unlikely to extend beyond approximately 8-10 km away due to the more intermittent and limited visibility of the Proposed Development and its appearance in relation to other wind farms.

Effects on landscape character are more limited in their extent, with the assessment indicating that significant effects are likely to be contained within less than 6.5 km of the Proposed Development. As with the visual effects, significant effects at 6.5 km away are assessed in relation to the current scenario of operational and under construction wind farms and will become not significant when wind farms that are currently consented but not yet constructed are taken into consideration.

The landscape and visual effects of the Proposed Development are limited by the level of operational, under construction and consented wind energy development within 6.5 km of the Proposed Development Area The general trend of the Windy Standard Complex and other identified wind farms is towards larger turbines, and while the Proposed Development will introduce turbines of a larger size than are currently operational, under construction or consented, it will not appear out of scale with these turbines due to the limited differential in size and its location at the centre of the Windy Standard Complex and other identified wind farms, which ensures that it will almost always be seen in the context of other, closer, turbines.

As well as limiting the effects of the Proposed Development itself, the level of baseline wind energy development ensures that no significant cumulative effects will arise as a result of the Proposed Development.

There are no residential properties within a 2 km radius of the nearest turbine and, in accordance with best practice guidance[16], a Residential Visual Amenity Assessment (RVAA) is therefore not required and has not been assessed within the chapter.

Snapshots of the visualisations produced to illustrate the Proposed Development are reproduced below in Images 2 and 3. The full figures and visualisations which should be referred to for assessment purposes are provided in Volume 3 of the EIA.

[16] • Landscape Institute (2019) *Technical Guidance Note 2/19 Residential Visual Amenity Assessment*. Landscape Institute

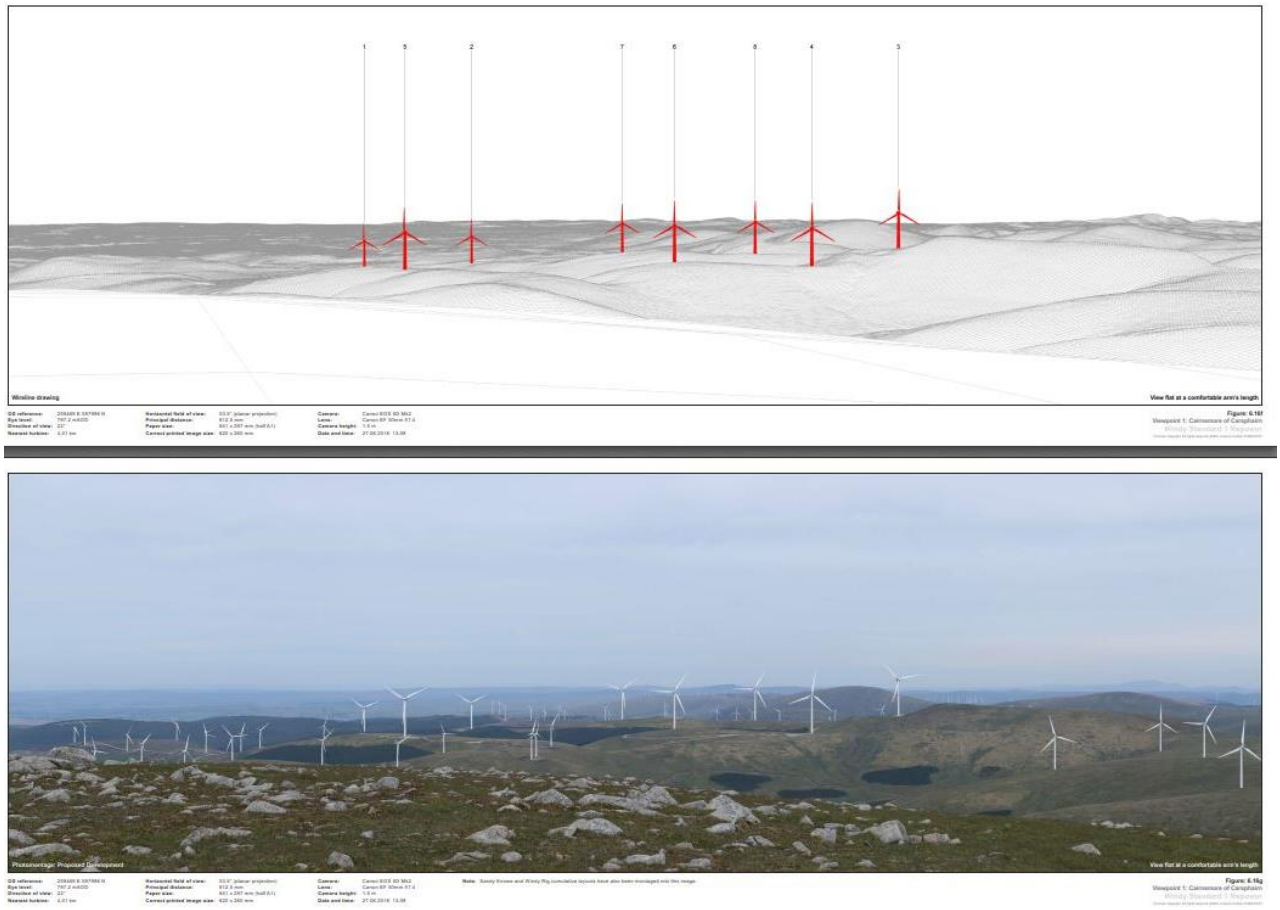

Figure 2: Viewpoint 1 – Cairnsmore of Carsphairn, Figure 6.16g of the EIAR, Volume 3

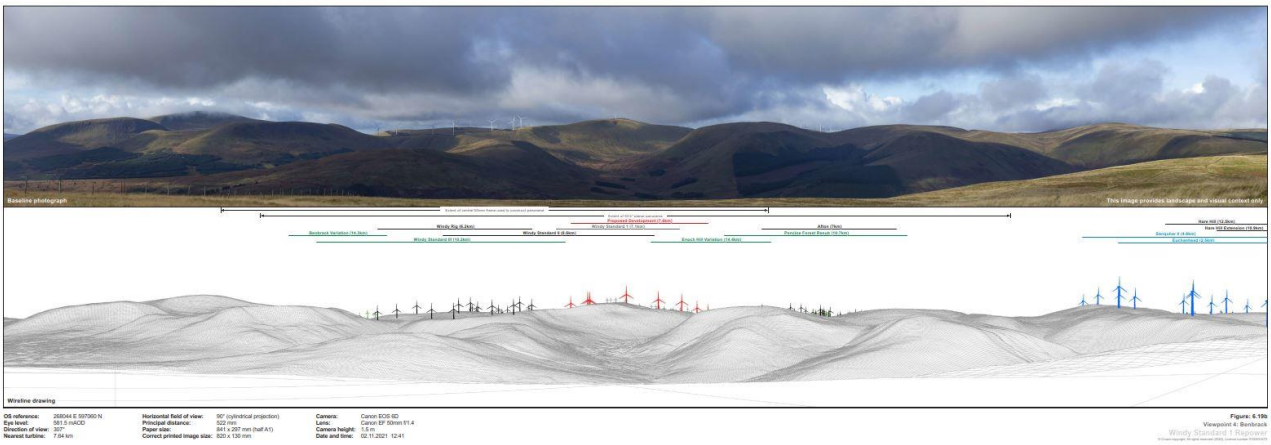

Figure 3: Viewpoint 4 – Benbrack, Figure 6.19b of the EIAR, Volume 3

Chapter 6 of the EIAR should be referred to for full detailed assessment of each receptor. It however concludes that:

- Effects on Physical Elements: The Proposed Development will affect two landscape elements; rough grassland/moorland ground cover, and coniferous forestry. The effect on both of these landscape elements will be **not significant**.

- Effects on Landscape Character: the LCTs, the cumulative effect on the RSA will be **not significant** in all scenarios, as the operational and under construction wind farms are a prevailing characteristic of the landscape, and the addition of the Proposed Development to these will not materially alter this situation.
- Effects on Views: The cumulative viewpoint assessment has indicated that cumulative effects will be **not significant**, and this will apply to views from core paths. This is due to the extensive wind energy development that forms the context to the Proposed Development as seen at every viewpoint, which ensures that the addition of the Proposed Development itself will have a non-material effect on the cumulative situation.
- Effects on Visible Aviation Lighting: The assessment of night-time visual effects for the Proposed Development has predicted a **significant effect** at one of the three night-time viewpoints

5.3. Cultural Heritage

Cultural heritage is the legacy of tangible and intangible heritage assets that is inherited from past generations and therefore is important to be conserved. These include Scheduled Monuments and heritage assets in the HES records. Baseline survey work indicated the Proposed Development has several features of cultural heritage importance. Within the inner Study Area (ISA) there is one Scheduled Monument. The ISA is Proposed Development Area plus 1 km from the red line boundary. Within the Outer Study Area (OSA) there is one Conservation Area, one inventoried Garden and Designed Landscape, one Property in Care, two records of Category A Listed Buildings and 18 Scheduled Monuments. The OSA is the area from the boundary of the ISA to 15 km from the locations of the proposed turbines.

There are **no predicted significant effects** on the setting of heritage assets arising from the construction or operation of the Proposed Development. The development therefore does not significantly adversely affect the fabric or setting of any Listed Buildings, the integrity of the setting of any Scheduled Monuments or the setting of any Garden Designed Landscapes (GDLs) on the Inventory of Gardens and Designed Landscapes.

A full assessment of cultural heritage is provided in Chapter 7 of the EIAR. Appropriate mitigation would consist of a watching brief on the elements of the ground works (turbine base, hard standing, crane base, auxiliary crane bases and laydown area) associated with the construction of turbine five, as this area intersects with a mapped Asset. The precise scope of the watching brief would be negotiated with Dumfries and Galloway Council (DGC) Archaeology Service and the agreed mitigation programme would be documented in a Written Scheme of Investigation prior to construction. No mitigation is proposed with respect to the potential impacts due to setting change.

5.4. Ecology and Ornithology

Extensive surveys over multiple years have been conducted on the site to thoroughly categorise and record the flora (plants) and fauna (animals) on the site. Particular care has been taken to record any sensitive species and habitats present.

The Proposed Development is **not predicted to have significant effects** on any important ecological and ornithological receptors during any of the phases of the Proposed Development life cycle. Assessments of the relevant potential effects upon ecology and ornithology are detailed in Chapter 8 and 9 respectively.

Despite the absence of significant effects, suitable offsite projects are being identified in discussion with the Applicant and suitable local parties in order to develop a Habitat Management Plan (HMP) in offsite locations which will provide a more significant positive impact to the local environment than would be possible on the limited features present within the Proposed Development Area. The creation of site-specific Construction Environment Management Plan (CEMP) and appointing an Environmental Clerk of Works (ECoW) will be carried out to monitor adherence to plans

5.5. Hydrology, Geology and Hydrogeology

Rock types, water courses, and groundwater dependent terrestrial ecosystems (GWDTE) were categorised and recorded during the EIA process.

Scottish Water, DGC, SEPA and other engaged stakeholders have been consulted during the EIA and their guidance used in designing the layout to protect watercourses from disturbance and potential effects on water quality during decommissioning and restoration of WSI, construction and operation. Good practice during construction, adherence to a site-specific CEMP and a Drainage Management Plan as well as the appointment of an ECoW have been considered as embedded mitigation and as such **no significant effects** are assessed to result. A detailed assessment of hydrological elements is provided in Chapter 10 of the EIAR.

5.6. Forestry

The total study area extends to 3479.8. ha and is comprised of privately owned and managed woodlands. As a result of the construction of the Proposed Development, there would be a net loss of woodland area. Because the Proposed Development has utilized existing infrastructure, only a small proportion of the Forestry Study Area (FSA) is affected. The area of stocked woodland in the study area would decrease by 7.5 ha.

In order to comply with the criteria of the Scottish Government's Control of Woodland Removal Policy, compensation planting would be required. The Applicant is committed to providing appropriate compensatory planting. The extent, location and composition of such planting to be agreed with Scottish Forestry (SF), taking into account any revision to the felling and restocking plans prior to the commencement of the construction phase of the wind farm.

Chapter 11 Forestry of the EAIR, fully describes the plans as a result of the Proposed Development for felling, restocking and forest management practices; the process by which these were derived; and the changes to the physical structure of the forestry within the Proposed Development Area.

5.7. Aviation

The potential effects upon Aviation and Existing Infrastructure (other than WSI) are assessed in Chapter 13 of the EIAR.

The Civil Aviation Authority (CAA) requires any structure equal to and taller than 150 m in height to be fitted with visible aviation warning lighting. Infra-red lighting will be fitted to all turbines in the Proposed Development to enable aircrew using Night Vision Imaging Systems (NVIS) to see and avoid them at night. To assist non-NVIS-equipped aircraft, medium intensity steady red lights will also be fitted to all turbines in the Proposed Development. These will be dimmed in clear sky conditions.

Under the usual planning conditions expected in the consent, if granted, the Ministry of Defence (MoD) would be informed of the dates of commencement, completion, final turbine locations and heights.

The NATS En Route plc Primary Surveillance Radar (NERL PSR) at Lowther Hill will have line of sight to all turbines in the Proposed Development. However blanking has already been applied to the Lowther Hill radar over the Proposed Development Area to mitigate the effects of the Windy Standard I and Windy Standard II wind farms. **The effects of the Proposed Development on the Lowther Hill PSR are therefore assessed as negligible.**

1.1.1 PSRs at Glasgow Airport, Kincardine, Edinburgh Airport, RAF Spadeadam and QinetiQ West Freugh have no line of sight to the Proposed Development due to intervening terrain. Consequently, the Proposed Development will have no effects on those radars.

The Glasgow Prestwick Airport (GPA) Terma radar has inherent wind farm mitigation capabilities which are capable of addressing radar visibility of the Proposed Development. **The residual effect on the GPA PSR will be negligible.**

Effects on GPA Instrument Flight Procedures (IFP) are the subject of an assessment by GPA's Approved Procedure Designer. If this assessment concludes that any of the airport's IFPs require alteration, this will necessitate an Airspace Change Proposal (ACP) to the CAA. **In the event that the IFP assessment concludes that changes are required, the effect will be of moderate significance.**

In summary, it is concluded in the EIAR that, with this mitigation in place, there are **no significant residual effects** from the Proposed Development upon aviation interests.

5.8. Existing Infrastructure (other than WSI)

5.8.1. Telecommunications

Fixed microwave links are direct line-of-sight communication links between transmitting and receiving dishes placed on masts generally locate on hilltops that vary in length from a few kilometres to over 70 km. They are used for the transmission of information to broadcasting masts for TV and radio and for the mobile telephone networks.

Telecommunications and broadcasting network operators were consulted during the scoping exercise such as British Telecoms (BT). BT stated that the proposed site layout at Scoping stage (Figure 4.6 of the EIAR) will cause interference to BT's current and presently planned radio network as turbine two fails BT's 100 m required infringement zone but all other turbine locations pass.

The existence of the radio link present at the location of turbine two was known to the Applicant at an early stage of the repower design process as it provides a communication link for the Windy Standard Control Room. At the time of the construction of the Proposed Development, the Applicant proposes to install a fibre connection in place of the radio link.

Chapter 13 of the EIAR provides more information on telecommunications.

5.8.2. Existing Network Plans

An online search tool was used to investigate the location of the Proposed Development against utility asset owners of underground and overhead pipes and existing cable routes in the electricity, gas, high pressure fuel, water and fibre optic networks.

Scottish Power (SP) Energy Network identified underground extra high voltage (EHV) 33 kV lines present at the proposed locations of turbines one and seven, which are current infrastructure components of the existing Windy Standard I Wind Farm connecting the existing turbines to the onsite substation. Maps of where the SP Energy Network assets are located can be found in Technical Appendix 13.1.

Where there are utility assets within the Proposed Development Area, these are proposed to be re-used insofar as possible for the Proposed Development or safely removed during the decommissioning of WSI. This is described further in Chapter 5 Project Description.

5.9. Noise

The potential effects upon noise are assessed in Chapter 14 of the EIAR. Within the chapter guidance contained within ETSU-R-97 and the Institute of Acoustics (IOA) Good Practice guidance (GPG) was used to assess the likely operational noise impact of the Proposed Development. Predicted levels indicate that for

dwellings neighbouring the Site the operational noise impact is **not significant** after the site-specific noise limits (SSNL) are adopted.

This outcome was determined by an assessment that has been undertaken against both sets of limits to demonstrate that the cumulative noise predictions can meet the Total ETSU-R-97 Noise Limit (TNL) and also to show that the noise predictions from the Proposed Development can meet the SSNL. No significant noise effects have been predicted due to the operation of the Proposed Development.

Due to the separation distances between the Proposed Development, a construction noise assessment has not been undertaken. Nevertheless, a range of good practice measures would be detailed in the CEMP and employed to minimise noise impacts.

5.10. Socioeconomics

Chapter 15 of the EIAR provides an assessment of the likely significant Socioeconomics, Tourism and Recreation effects from the construction and operation of the Proposed Development.

During its construction and development and operations, the Proposed Development is expected to deliver a series of economic benefits. It was estimated that the expenditure associated with construction activity could generate:

- £2.4 million Gross Value Added (GVA) and support 35 years of employment in Dumfries and Galloway; and
- £10.6 million GVA and 149 years of employment across Scotland.

The expenditure required for the operations and maintenance of the Proposed Development could generate each year:

- £0.3 million GVA and support three jobs in Dumfries and Galloway; and
- £0.7 million GVA and eight jobs across Scotland.

The Proposed Development will also contribute to public finances through the payment of non-domestic rates, which could amount to around £0.3 million each year.

The Applicant is committed to maximising local economic benefits by following Scottish Government guidance on community benefits and offering up to £248,000 each year to local communities during the operation of the Proposed Development. This funding will complement the existing contribution to local projects from the community benefits of Windy Standard I and Windy Standard II, which have delivered investment in the community worth over £530,000.

The Applicant also wishes to work with suppliers to maximise local economic content and strengthen the local renewable sector. In addition, it is pursuing opportunities to create the skills required locally to benefit from future projects in the renewable energy sector. This includes the provision of bursaries to local students at Dumfries and Galloway College and the potential use of decommissioned turbines for training purposes.

The Applicant is exploring ways to re-purpose the material from the existing turbines. To achieve this, the Applicant has signed a memorandum of understanding with ReBlade (see Appendix 15.1 of the EIAR), a company offering specialist blade and nacelle decommissioning services. Wind turbine components could then be re-used in several ways including for a local play park and to create bus shelters. This would benefit local children and broaden the range of benefits from the project, in line with the holistic approach to wellbeing advocated in Scotland's National Performance Framework.

The assessment also considered the relationship between the Proposed Development and local tourism and recreation. To do so a literature review on tourism and recreation, and onshore wind developments was carried out. This found that evidence for Scotland has consistently suggested that there is no relationship between onshore wind developments and tourism activity at national, regional and local level.

The analysis has also considered tourism and recreation assets that are located within 15 km from the Proposed Development. It found that the **Proposed Development will not have any significant effects** on local accommodation providers, recreation trails and tourism attractions.

5.11. Climate Change

Chapter 16 of the EIAR evaluates the effects of the Proposed Development on climate change via a carbon balance assessment.

The potential for environmental receptors to be impacted by the Proposed Development is assessed in Chapters 6-15 of the EIAR. Of these, ornithological, ecological and hydrological receptors are the most sensitive to climate change and are discussed further in Table 5.1:

Table 5.: Climate change effects on environmental receptors

EIAR Report Baseline	Receptor	Climate Change Effect	Effect on Receptor
Chapter 8	Ornithology	Temperature – up to + 2ºC Shift to wetter winters and dryer summers. Negligible change in wind speeds.	A rise in temperature has the potential to impact on habitats which in turn may affect the behaviour of bird interests. Uncertainties are high and the type and significance of effects identified from the Development are not anticipated to alter as a result.
Chapter 9	Ecology – Habitats, Protected Species	Temperature – up to + 2ºC Shift to wetter winters and dryer summers. Negligible change in wind speeds	While changes in temperature could affect the composition and growth rates of plant communities and invertebrates, and hence protected species and habitats, the uncertainties are high and it is not clear that the effect of the Development on those receptors would alter substantially as a result.
Chapter 10	Geology, Hydrology and Hydrogeology	Shift to wetter winters and dryer summers.	Limited change to future baseline and to the identified effects of the Development.

Given the relatively limited magnitude of change in climate parameters predicted over the operation of the Proposed Development, **negligible changes to the baseline for environmental receptors are anticipated** during this period. This is incorporated into the assessments undertaken in other chapters of this EIAR.

In terms of the potential effects of climate change on the Proposed Development to ensure adequate resilience of the project to climate change, it is considered that many of the key climate trends[17] such as increased temperature, changes in rainfall and sea level rise will **not affect the Proposed Development** due to its location and high elevation. And during severe windstorms, turbines engage installed braking mechanisms to shut turbines down.

[17] Available online from: https://www.metoffice.gov.uk/research/approach/collaboration/ukcp/index (last accessed 09/06/2022)

5.11.1. Carbon Balance

Peatland is an important carbon store and the Proposed Development will have some impact on onsite peatlands, despite mitigations proposed to limit disturbance to peat and bog habitats. During hydrology studies a peat survey was done on the site which showed the area of peat on the site was very limited (See Figure 10.4 of the EIAR).

A carbon balance assessment report has been produced and SEPA's Carbon Calculator completed to determine the carbon payback time for the Proposed Development (see EIAR Technical Appendix 16.1 for full details). The results from the carbon calculator reveal that the net impact of the Proposed Development will be positive overall over its 35-year lifespan. It is expected to generate over 33 years' worth of net carbon savings if it replaced fossil fuel electricity generation. In addition, over the expected 33 years that the wind farm is likely to be generating carbon-free electricity, this could result in expected **CO_2 emission savings of over 1.6 million tonnes[18] of CO_2** when replacing fossil fuel-mix electricity generation.

This illustrates a **positive net impact** on climate change through contributing significantly towards the reduction of GHG from energy production.

5.12. Synergistic Effects

An assessment of synergistic effects considers the combination of effects upon different topics together. This is provided in Chapter 17 of the EIAR. It ensures that the assessments provided in the EIAR for each topic are not considered in isolation.

During the construction and decommissioning phases of the Proposed Development, potential adverse synergistic effects are limited to the Proposed Development Area where there will be heavy plant operations, earth works, forestry operations and vehicle movements. These could result in potential synergistic effects upon physical and biological receptors including where there are overlaps between ecology, hydrology and hydrogeology. These effects would be temporary in nature, will be managed through a CEMP, Pollution Prevention and Incident Plan (PPIP), Traffic Management Plan (TMP) and Decommissioning Plan and in isolation have been assessed in the EIAR as not significant. These potential effects will also be monitored by an Environmental Clerk of Works (ECoW) and if deemed necessary a Planning Monitoring Officer enforced through planning condition(s). Given the limited number and extent of receptors, the limited effects predicted and their temporary nature, the synergistic effects during construction and decommissioning phases are considered **not significant**.

Potential synergistic effects during the operational phase relate primarily to overlaps between physical and human receptors and are limited to areas which are within or close to the Proposed Development Area where there may be a combination of potential visual and noise effects.

The EIAR predicts that there are **no significant adverse effects in isolation for noise**. None of the properties assessed have been identified to be affected to such a degree that they would become 'widely regarded as an unattractive place where to live and/or the development is inescapably dominant or unpleasantly overwhelming'. According to guidance, the location of the Proposed Development is in an area that is characterised by extensive baseline (operational and consented) wind energy development, including the Windy Standard I turbines on the Proposed Development Area itself, this is beneficial as it ensures that the Proposed Development will not introduce a new influence on unaffected areas. Furthermore, a combination of all these effects at once is not possible and in sequence would be very limited in occurrence and duration. It is not considered that the synergistic effects would become overbearing such that these places become unpleasant locations to reside.

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[18] Calculation is 33 years x 50,836 tCO_2 (as shown in Table 16.5 of Chapter 16 and online submission).

Cumulative effects were identified to be **not significant**, to views from core paths. This is due to the extensive wind energy development that forms the context to the Proposed Development as seen at every viewpoint, which ensures that the addition of the Proposed Development itself will have a non-material effect on the cumulative situation. As neither the potential visual effects or direct effects will prevent use of these in the long term, it is considered that the synergistic effects during construction and operation are **not significant.**

6. Conclusions

This NTS has provided a non-technical summary of assessments provided in the EIAR submitted to support the application for the Proposed Development. This NTS has presented the information in a manner that can be readily understood.

The Proposed Development is located in a suitable area for wind farm development and has followed a site design and design evolution process. The design stages have taken place over several years utilising a number of iterations in response to environmental data, new policies, market dynamics and consultee response. Through balancing the various site constraints with the scale of development required to be economically viable, The Applicant considers that the Proposed Development provides the best use of the site with respect to the potential renewable electricity generating capacity balanced against the potential environmental and other effects.

The EIAR presents the likely effects of the Proposed Development as well as potential synergistic effects which consider such effects in combination. Following the implementation of mitigation primarily in the form of embedded mitigation in the siting and design of the proposal, likely significant adverse effects are restricted to isolated landscape and visual effects upon limited receptors within close proximity of the Proposed Development.

Suitable offsite projects such as suitable habitat for black grouse are being discussed between the Applicant and interested local groups in order to develop a HMP in respect of possible offsite locations which will provide a more significant positive impact to the local environment that would be possible on the limited features present within the Proposed Development Area.

The Applicant has 25 years' experience working in the local area, which has supported both local businesses and communities through the payment of over £530,000 in community benefits through Windy Standard I and Windy Standard II wind farms. The Proposed Development provides an opportunity to continue to provide socioeconomic benefits through continuing employment opportunities.

The Proposed Development will contribute towards meeting national renewable energy targets and have a significant positive effect on reducing carbon dioxide emissions to help reach the national carbon net zero target.

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Natural Power acting as lead consultants on behalf of Fred. Olsen Renewables.