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CHARTERED TOWN PLANNERS

Breezy Hill Energy Project
Section 36 Application:

Planning Statement Update

December 2025

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Contents

1. Introduction

1.1 Background

1.1.1 This Planning Statement Update has been prepared by David Bell Planning Ltd ('DBP') on behalf of Breezy Hill Energy Ltd (hereafter referred to as 'the Applicant') in relation to the proposed Breezy Hill Energy Project (hereafter referred to as the 'Proposed Development'). The application site is located in the East Ayrshire Council ('EAC') administrative area.

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

1.1.3 The application is accompanied by an Environmental Impact Assessment Report ('EIA Report') which has been undertaken in accordance with the Electricity Works (Environmental Impact Assessment) (Scotland) Regulations 2017 ('the EIA Regulations'). The EIA Report presents information on the identification and assessment of the likely significant adverse and beneficial environmental effects of the proposal.

1.1.4 Since the submission of the Section 36 application to the Scottish Ministers in May 2025, some minor changes have been made to the layout of the Proposed Development to address several issues, including reducing impacts on active commercial forestry, and improving local involvement in the scheme (a more detailed description of the proposed changes is set out in the Additional Information ('AI Report') which has been prepared by SLR.

1.1.5 The revised layout is referred to in the AI Report as the "Proposed Development". The AI Report is being submitted to the Scottish Ministers as Additional Information, since it comprises a revision of the Breezy Hill Energy Project Environmental Impact Assessment ('EIA') Report to take account of the changes that have been made to the Proposed Development.

1.1.6 The Applicant previously addressed the planning policy position in a Planning Statement (May 2025). The Planning Statement contained a detailed appraisal of the proposal against the provisions of National Planning Framework 4 ('NPF4') and the Local Development Plan ('LDP').

1.1.7 This Planning Statement Update does not repeat the past policy submissions. However, it considers the revised Proposed Development against the current energy, climate change and planning policy framework. An update is provided in relation to the energy and planning policy matters which have emerged since May 2025.

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

1.2 Changes to the Proposed Development

1.2.1 Although the layout of the Proposed Development has changed since the May 2025 Application, the overall generating capacity is the same, namely 100 MW of wind energy and 40 MW of battery energy storage system ('BESS').

1.2.2 Since the submission of the section 36 application in May 2025, a review of options to reduce impact on forestry, in combination with further discussions with neighbouring landowners ,was undertaken, with the result that turbines T2 and T13 were relocated within the Application Site boundary. The relocation of T2 necessitated the rerouting of the access track leading to T1. The main driver for the decision to relocate T2 and T13 was to reduce forestry felling requirements, and has had the benefit of moving T2 off of an area of peat and onto underlying soils which have been confirmed through hand trials to not be peat, and of further enabling

landowners and close neighbours to participate in the design and mitigation of the Proposed Development.

1.2.3 The locations of Turbine 02 and Turbine 13 have therefore changed, along with their access tracks, and the track leading to Turbine 01 has been realigned. This has involved the re-positioning of Turbine 02 approximately 171 m to the north and Turbine 13 approximately 647 m to the west. The locations of the remaining 18 turbines, access tracks and other ancillary infrastructure have not been altered. These changes are described in detail in Chapter 2 of the AI Report.

1.2.4 In addition to the turbines and BESS, the Proposed Development will include the following ancillary infrastructure:

- Turbine foundations;
- Crane hardstands;
- A site entrance;
- Internal and private access road network;
- Watercourse crossings;
- On-site borrow pit(s) depending on the suitability of site-won materials to provide aggregate for the construction of the development;
- Transformers and underground cables;
- Onsite substation / switchgear building;
- A substation construction compound; and
- Three construction compounds.

1.2.5 The Carbon Calculator has also been checked to take account of the proposed changes to the development due to the relocation of T2, T13 and the consequent internal track layout changes.

1.3 Structure of Statement

1.3.1 This Planning Statement Update is structured as follows:

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

2. The Renewable Energy Policy & Legislative Framework: Update

2.1 Introduction

2.1.1 This Chapter refers to the renewable energy policy and emissions reduction legislative framework with reference to relevant international, UK and Scottish provisions. The framework of international agreements and obligations, legally binding targets and climate change global advisory reports is the foundation upon which national energy policy and greenhouse gas emissions ('GHG') reduction law is based. This underpins what can be termed the need case for renewable energy from which the Amended Development (2025) can draw a high level of support.

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

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

> At the international level:

- The UN Emissions Gap Report (November 2025).

> At the UK Government level:

- The Onshore Wind Taskforce Strategy (July 2025).

> At the Scottish Government level:

- CCC Report to Scottish Parliament – Progress in reducing emissions in Scotland (March 2024);
- The Climate Change (Emission Reduction Targets) (Scotland) Act (2024);
- The Scottish Government's Green Industrial Strategy (2024); and
- CCC Report, Scotland's Carbon Budgets, Advice for the Scottish Government (2025).

2.1.4 In addition, reference is made to the Onshore Wind Policy Statement ('OWPS') (December 2022) in order to provide ease of reference to its key provisions. The OWPS, as referenced in the previous Planning, Design and Access Statements referred to Scotland's onshore wind deployment figures as of December 2022. However, this is brought up to date by reference to the BVG Associates monitoring report of November 2024 which provides more recent onshore wind deployment figures and also statistics in relation to onshore wind at different stages within the planning system.

2.2 International Commitments on Climate Change

The Paris Agreement (2015)

2.2.1 By way of international context, in December 2015, 195 countries adopted the first ever universal, legally binding global climate deal at the Paris Climate Conference ('COP21'). The Paris Agreement within the United Nations ('UN') Framework Convention on Climate Change sets out a global action plan towards climate neutrality with the aims of stopping the increase in global average temperature to well below 2˚C above pre-industrial levels, and to pursue efforts to limit global warming to 1.5˚C.

2.2.2 Moving to a low carbon economy is a globally shared goal and will require absolute emission reduction targets. The UK Government's commitment under the Paris Agreement links through to the Climate Change Committee's ('CCC') advice to both the UK and Welsh Governments on net zero targets which have now, at both the UK and Welsh Government levels, been translated into new legislative provisions and targets leading to net zero by 2050. This is referred to below in more detail.

2.2.3 The Paris Agreement does not itself represent Government policy in the UK or Wales. However, the purpose of domestic and renewable energy and GHG reduction targets is to meet the UK's commitment in the Paris Agreement.

UN Emissions Gap Report (2025)

2.2.4 The UN Emissions Gap Report (November 2025) entitled "Off Target" provides the annual independent science-based assessment of the gap between the pledged GHG reductions, and the reductions required to align with the long-term temperature goal of the Paris Agreement.

2.2.5 The Executive Summary Report comments on the background of GHG emission increases and the new Nationally Determined Contributions ('NDCs') submitted ahead of COP30 in Brazil as follows (page 4):

"*As this sixteenth Emissions Gap Report shows, the new NDCs have limited effect on narrowing the emissions gap by 2030 and 2035, leaving global warming projections well above the Paris Agreement's temperature goal. New scenarios show that limiting warming to 1.5°C by 2100 remains technically possible. However, due to the continued delay in deep emission cuts, 1.5°C pathways now imply higher and higher temporary exceedance of this temperature target. The magnitude and duration of this overshoot must be limited as much as possible. Each year of delayed action locks in carbon intensive infrastructure results in greater losses for people and ecosystems, higher adaptation costs and a heavier reliance of costly and uncertain carbon dioxide removal. Each year of inaction makes the path to net zero by 2050 and net negative emissions thereafter steeper, more expensive and more disruptive*."

2.2.6 Section 7 of the Executive Summary sets out that "*despite the increasing likelihood of higher and longer temperature overshoot, pursuing efforts to limit global warming to 1.5°C remains as critical and relevant as ever*".

2.2.7 The report adds: "*accelerated mitigation action provides benefits and opportunities. In many cases, mitigation aligns with economic growth, job creation, energy security and achievement of other pressing development needs and the sustainable development goals. The required technologies are available, and wind and solar energy development continue to exceed expectations, lowering deployment costs and driving market expansion. Yet deployment remains insufficient, and accelerated emission reductions require overcoming policy, governance, institutional and technical barriers….."*

2.2.8 The latest Gap Report is expressly clear that the international position in relation to combating climate change is worsening. The conclusions also make clear that deployment of renewable energy remains key to combating the climate emergency, including wind energy.

2.3 UK Climate Change & Energy Legislation & Policy

The Onshore Wind Taskforce Strategy (July 2025)

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

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

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

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

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

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

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

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

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

2.3.4 The various commitments and actions within the strategy cover:

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

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

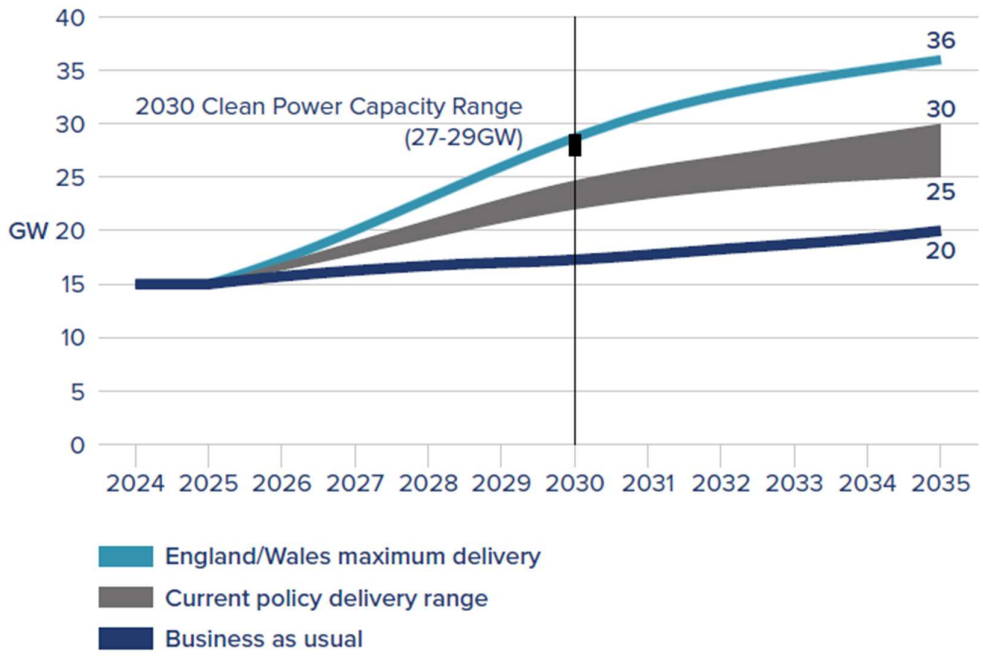
"*All routes to achieving this mission are reliant on mass deployment of renewable electricity technologies, including onshore wind. The Clean Power Plan stated that to decarbonise the power sector by 2030, 27-29GW onshore wind will be needed within GB1. That is a significant increase above the current installed capacity, which stands at 14.8 GW in GB (over 16GW in the UK)".*

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

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

2.3.8 At page 18 of the Strategy, reference is made to illustrative deployment scenarios which it states emphasises "the challenge in meeting the 2030 clean power range in GB which will require significant deployment in Scotland, England and Wales." This is illustrated in **Figure 2.1** below.

Figure 2.1: Clean Power Deployment Scenarios (Onshore Wind)



2.3.9 The scenarios as illustrated in **Figure 2.1** include:

> *Business as usual* - under this scenario onshore wind only reaches in the region of 17 GW by 2030 and 20 GW by 2035.

> *Current policy delivery range* - this assumes the implementation of the reform announced as part of the Clean Power 2030 Action Plan and the action set out in the Onshore Wind Taskforce Strategy. In this scenario around 25 GW is installed by 2030 and 30 GW by 2035.

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

- *England / Wales maximum delivery* - this is set out as the most optimistic scenario and shows the potential of increasing onshore wind deployment through strengthened policies in England and Wales. Under this scenario onshore wind deployment could reach levels consistent with the 2030 Clean Power range but also increases to in excess of 35 GW by 2035.

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

2.4 Climate Change & Renewable Energy Policy: Scotland

Scotland's Draft Climate Change Plan (November 2025)

2.4.1 The Planning Statement referenced the Climate Change Committee's Report to the Scottish Government (May 2025) on the matter of carbon budgets required in order for Scotland to achieve net zero.

2.4.2 Specifically in relation to electricity and low carbon supply the Executive Summary of that report explained (page 12) that in the 'Balanced Pathway' set out by the CCC:

"the capacity of variable renewables in Scotland (including offshore and onshore wind and solar) more than triples from 15 GW in 2023 to 49 GW by 2035, increasing to 66 GW by 2045. This provides 98% of electricity generation in Scotland in 2035 and caters for increasing demand in Scotland and the rest of Great Britain (GB). Grid storage, use of storable fuels on the GB-wide network, and smart demand flexibility ensure a reliable supply of electricity even in adverse weather years. These technologies need to be accompanied by rapidly expanding the transmission grid, upgrading the distribution network, and speeding up the grid connection process. To deliver clean electricity, the planning process to approve large electricity infrastructure projects in Scotland needs to be urgently improved." (emphasis added)

2.4.3 Scotland currently has approximately 17.6 GW[2] of renewables operating capacity, therefore, to achieve the Balanced Pathway figure of 66 GW by 2045 will require an additional 48.4 GW to be deployed.

2.4.4 The Scottish Government published 'Scotland's Climate Change Plan – 2026-2040' ('draft CCP') on 6th November 2025. The Plan covers the period 2026 to 2040 and aligns with three five-year "carbon budget" periods: 2026-30, 2031-35 and 2036-40. The draft CCP sets out the policies and proposals the Scottish Government will take forward to enable the carbon budgets set out in legislation to be met. The carbon budgets have been set in line with the levels proposed by the CCC in May 2025, referred to above, and provide a clear pathway towards Scotland achieving net zero by 2045.

2.4.5 The draft CCP confirms that Scotland remains committed to achieving net zero GHG emissions by 2045 at the latest and that as of 2023, Scotland had reduced emissions by 51.3% since 1990 — the largest reduction in the UK.

2.4.6 The Plan notes that the key driver of the transition to date has been the transformation in the way energy is generated - from coal and gas to a thriving renewables sector. In 2023, 70% of electricity generated in Scotland was from renewable sources.

2.4.7 It acknowledges the opportunity the transition to net zero provides in terms of growing the economy noting that the net zero transition can support significant economic opportunities for Scotland.

2.4.8 The Plan sets out average reductions in GHG emissions (compared to 1990 baseline) for each five-year period:

- 57% lower than baseline levels for 2026-2030,

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

> 69% lower than baseline levels for 2031-2035,
> 80% lower than baseline levels for 2036-2040, and
> 94% lower than baseline levels for 2041-2045.

2.4.9 These budgets provide a "pathway" toward net zero by 2045, and the Plan is designed to ensure policies are in place to meet them.

2.4.10 The draft CCP sets out sectoral policies relating to a range of sectors, which are prescribed in legislation including energy supply; agriculture; and transport, amongst others. Key policies and actions have been set out for each sector to meet the carbon budgets. The draft CCP outlines the emissions pathway for each sector covered by the plan, some of the key actions which will be taken to achieve it and the economic opportunities and benefits this action will support.

2.4.11 Annex 2 of the draft CCP contains the Sectoral Annexes which support the draft CCP. Energy supply is one of the key areas of focus. At page 70, the document sets out the vision for Scotland stating that:

"By 2035, we will have expanded our renewable capacity significantly to meet the increasing demand as other sectors decarbonise. We already have an ambition to have delivered 20GW of onshore wind by 2030 and we have consulted on a proposed updated ambition for the development of up to 40GW of new offshore wind by 2040."

2.4.12 It continues that as we transition to net zero and reduce reliance on fossil fuel generation *"energy storage will play a larger role in ensuring a secure and resilient electricity system by providing a reliable and flexible electricity supply."* (page 79)

2.4.13 One of the actions identified to achieve the vision of emissions reduction for the energy generation sector means *"moving to an electricity system in which the residual amount of unabated gas is displaced by low carbon and renewable sources.* ***To deliver this target, whilst ensuring a safe and secure supply, we must grow our renewables capacity****, including from offshore and* ***onshore wind****, and solar."* (Page 83, Annex 2) (emphasis added)

2.4.14 The publication of the CCP demonstrates the continued commitment required, and needs case, for delivering additional renewable energy capacity to achieve net zero.

2.4.15 The draft CCP is currently out for consultation until 29 January 2026. Scottish Parliament committees also have until 5 March to scrutinise and report on the aspects of the Plan which fall under their remit.

2.4.16 The Scottish Government has committed to publishing its final Climate Change Plan before the dissolution of Parliament for the 2026 election.

2.5 Conclusions on the Renewable Energy Policy & Legislative Framework

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

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

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

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

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

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

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

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

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

2.5.7 The policy documents referred to in the Planning Statement confirm the Scottish Government's policy objectives and related targets, reaffirming the important role that onshore wind will play in response to the climate crisis which is at the heart of all these policies.

2.5.8 In a number of respects the need case has further strengthened since the Section 36 application was submitted. At the international level the UN has advised of the increasing emissions gap which needs to be closed to meet international commitments under the Paris Agreement. The UK Government has issued the Onshore Wind Taskforce Strategy with a key objective of the UK reach 30 GW of onshore wind capacity by 2030. The Scottish Government has accepted the CCC's recommendations on carbon budgets and these are now confirmed in the Scottish Draft Climate Change Plan, recently published.

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

3. The Benefits of the Proposed Development

3.1 The Benefits: Summary

3.1.1 This Chapter summarises the benefits that would arise from the Proposed Development. Although there have been some minor changes to the layout of the Proposed Development, the benefits have not changed and they would be as follows:

Renewable Energy Generation & Energy Storage

> The Proposed Development would comprise approximately 140 MW of renewable energy generation and energy storage output capacity, including:
  - Up to 100 MW of wind energy; and
  - Up to 40 MW of BESS.

> The Proposed Development would make a valuable and important contribution to the attainment of the UK and Scottish Government policies of encouraging renewable energy developments; and in turn contribute to the achievement of UK and Scottish Government renewable energy, electricity storage and net zero targets.

> The UK legally binding target of net zero GHG emissions by 2050 and the Scottish Government target of net zero by the earlier date of 2045 are major challenges, as explained in the previous Chapter. The Scottish Government has made it clear that all renewable technologies are to be encouraged in the attainment of net zero.

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

Emissions Savings & Carbon Payback

> The carbon balance calculations establish that the Proposed Development (wind and solar elements) could still result in the saving of approximately 4.9 million tonnes of carbon dioxide equivalent emissions per annum over the project lifetime if a fossil fuel mix of electricity generation was used as the counterfactual position.

> The AI Report explains that the net emissions of carbon dioxide from the proposed amendments of the Proposed Development are expected to be 252,929 tonnes of CO2e, compared to the findings of the May 2025 EIA Report which predicted 242,525 tonnes of CO2e. As such, the Proposed Development has a payback time of 2.0 years compared to the 1.9 years indicated in the findings of the EIA.

Security of Supply & Energy Storage

> The policy framework seeks an increase to the requirements for both the scale and the urgency of delivery of new low carbon generation capacity (for Scotland this is advised by the CCC as being some 66 GW of capacity by 2045) by refocussing the requirement for low-carbon power for reasons of national security of supply and affordability, as well as for decarbonisation.

> With this context, the attractiveness of onshore wind as a proven low cost technology which will deliver significant benefits to consumers through decarbonisation, security of supply and affordability this decade, becomes clear.

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

Socio-Economic Benefits

- The Proposed Development would support jobs during construction and during operation across the Scottish economy. Overall, the socio-economic effects of the capital investment, employment and GVA to the economy would be beneficial (short term during construction, long term during operation).
- The report entitled 'Socio-*Economic Impact Assessment of Breezy Hill Energy Project*' should be referred to for its detail. In summary key points from the report include:
  - The Proposed Development's development and construction activity could generate:
    - £11.5 million Gross Value Added (GVA) and support c.160 job years of employment in East Ayrshire; and
    - £38.2 million GVA and c.560 job years across Scotland.
  - The expenditure required for the operations and maintenance of the Proposed Development could generate each year:
    - £1.0 million GVA and support c.8 jobs in East Ayrshire; and
    - £2.3 million GVA and support c.25 jobs across Scotland.
- The Proposed Development is expected to support the provision of local public services. During its operations, it is expected to generate approximately £1.2 million in domestic rates annually or £48 million over its 40-year operational lifetime.

- The Proposed Development could make a material, positive impact to the local area. The Applicant has committed to prioritising local companies for contracts and promoting these opportunities to local suppliers to achieve high local content.
- All the above would ensure a **contribution to the maximisation of the local supply chain content** and provide **opportunities for local employment**.
- The Economic Impact Report concludes that the various socio-economic benefits demonstrate that the Proposed Development would maximise net economic impact.

Community Benefits

- The Applicant has committed to a community benefit fund in line with Scottish Government guidance which can support local ambitions and needs.
- The Applicant is funding the investigation into the feasibility and design of a visitor centre/hub in conjunction with the Landowner, local community council representatives and the local planning authority.
- The design of the community benefit package has been discussed and refined to allow the first ten years' benefit monies to be made available at the project's financial close to fund the visitor centre/hub in the vicinity of the Coyle Water.
- £5,000 per installed MW per year will be allocated to the 9CCG (a group representing nine local community councils) throughout the 40-year life span of the Proposed Development, index-linked to preserve long-term value. However, the first ten years of community benefit funding would be pulled forward to fund the visitors' centre, assuming the required consent is obtained.
- It is understood that community benefit is not a material planning consideration, however the Applicant is committed to offering a package of community benefits.

Biodiversity Enhancement & Land Restoration

- Significant biodiversity enhancements are proposed as set out in a Biodiversity Enhancement and Management Plan ('BEMP'). The details of the proposed enhancement measures relating are set out in the next chapter in the context of NPF4 biodiversity policy and related obligations.
- Building on Forestry and Land Scotland's ('FLS's') North Kyle Forest Masterplan, the Proposed Development will support rewilding, public access and sustainable land use, with new walking and cycling paths. The Applicant is also funding an investigation into the feasibility and design of a visitor centre/hub in conjunction with the landowner, local community council representatives and the local planning authority. Such a centre, if progressed would be the subject of a separate planning application.

4. Development Plan Policy Appraisal

4.1 Introduction & NPF4 Appraisal

4.1.1 As set out in Chapter 1, the Planning Statement of May 2025 contained a detailed appraisal of the proposal against the provisions of NPF4 and the LDP. The past policy submissions, in particular those relating to NPF4 remain valid.

4.1.2 The key NPF4 policies are:

- Policy 1: Tackling the Climate and Nature Crises;
- Policy 3: Biodiversity;
- Policy 4: Natural Places;
- Policy 5: Soils;
- Policy 7: Historic Assets and Places; and
- Policy 11: Energy.

4.1.3 In terms of the effects of the revised Proposed Development the AI Report should be referred to for its detail. In summary however, the findings confirm that the proposed changes to the layout will not result in any changes to the predicted outcomes (significance of effects) of the EIA. Notwithstanding there would be no changes in the significance of effects predicted there would be lesser impacts as follows:

- Overall reduction of 4.5 ha of required infrastructure felling, and a reduction of 21.3 ha of management felling. T2 moved off peat onto soil that is not peat.
- 1,226m^3 less peat and soils will be disturbed compared to the Proposed Development of the May 2025 Application.

4.2 The adopted LDP

4.2.1 The Planning Statement addressed the relevant policies of the LDP. The various land use planning topics within the adopted LDP are already covered by the policy remit of NPF4. In these circumstances, it is not necessary to revisit the position of the revised Proposed Development against the policy provisions of the LDP.

4.3 Conclusions

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

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

5. Conclusions

5.1 The Climate Emergency & the Renewable Energy Policy Framework

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

5.1.2 Onshore wind was already viewed and described as "vital" to the attainment of targets in 2017. This imperative has only increased since a 'climate emergency' was declared by the Scottish First Minister in April 2019, in line with the recommendations made by the CCC (2019) 'net zero' publication[3]. Furthermore, the drive to attain net zero emissions is legally binding at the UK and Scottish Government levels by way of amendments to the 2008 Act and in Scotland through the provisions of the Climate Change (Scotland) Act 2009 and the Climate Change (Emissions Reduction Targets) (Scotland) Act 2019 as amended.

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

5.1.4 As explained in Chapter 2, the CCC has stated (May 2025) that the deployment of low carbon technology needs to significantly ramp up and Scotland will require an estimated 66 GW of capacity to be in place by 2045. In this regard in terms of renewable technologies the CCC has stated that onshore wind installations will need to double by 2030, and a higher figure is estimated in relation to renewable deployment capacity to achieve the Seventh Carbon Budget published in May 2025. The Labour Government has accepted the advice of the CCC and has committed to a 30 GW onshore wind target for the UK as set out in the recently published Clean Power Action Plan an Onshore Wind Taskforce Strategy.

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

5.2 The Planning Balance

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

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

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

[3] CCC, Net Zero, The UK's contribution to stopping global warming (May, 2019).

- The global climate emergency and the nature crisis are the foundations for the NPF4 Spatial Strategy as a whole. The twin global climate and nature crises are "*at the heart of our vision for a future Scotland*" so that "*the decisions we make today will be in the long-term interest of our country*"[4]. The policy position, and the priority afforded to combatting the climate emergency, is different to that which was set out in the former NPF3 and SPP;
- NPF4 Policy 1 (Tackling the climate and nature crises) directs decision-makers to give significant weight to the global climate emergency in all decisions. This is a radical departure from the usual approach to policy and weight and clearly denotes a step change in planning policy response to climate change. The matter of weight is no longer left entirely to the discretion of the decision maker; and
- Both NPF4 and the OWPS are clear that further onshore wind development, of scale and utilising modern, larger turbines, has a crucial role in combatting climate change, transitioning to a net zero Scotland and ensuring security of energy supply. NPF4 Policy 11 (Energy) strongly supports proposals for all forms of renewable, low-carbon and zero emissions technologies, including onshore wind farms.

5.2.4 It is important to fully recognise both the scale and urgency of the challenge set out in these documents, and the required response from decision-makers. NPF4 is clear that significant progress must be made by 2030 requiring, as set out in the OWPS, that "*we must now go further and faster than before. We expect the next decade to see a substantial increase in demand for electricity to support net zero delivery across all sectors, including heat, transport and industrial processes*"[5].

5.2.5 The OWPS, for the first time, sets an onshore wind target: a Scottish Government ambition for a minimum of 20 GW of installed onshore wind capacity by 2030. Policy therefore supports an increase in the installed capacity of onshore wind in Scotland by a minimum amount equivalent to about 130% of the entire installed capacity of all current operational onshore wind farms in Scotland in a period of around five years. This is also embedded in the Scottish Government's consultative draft Energy Strategy and Just Transition Plan, together with the commitment to "*place the climate and nature at the centre of our planning system*"[6] (original emphasis) in line with NPF4.

5.2.6 As the Statement of Need for Strategic Renewable Electricity Generation and Transmission Infrastructure explains[7] "*A large and rapid increase in electricity generation from renewable sources will be essential for Scotland to meet its net zero emissions targets*."

5.2.7 The Applicant has gone to considerable lengths to ensure a satisfactory layout, design and composition for the Proposed Development. In short, appropriate design mitigation has been applied. The environmental effects resulting from the proposal have been addressed through an iterative design process (i.e. 'mitigation by design') and a well-considered proposal has been established, which has acceptable effects and it would also deliver a significant opportunity for biodiversity enhancement.

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

[4] NPF4, page 2.
[5] OWPS 2022, paragraph 1.1.2.
[6] Energy Strategy and Just Transition Plan, page 55
[7] NPF4, page 103.

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

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

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

5.3 Overall Conclusion

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

5.3.2 The up-to-date policy set out in NPF4 and the OWPS and the policy being consulted upon in the draft Energy Strategy provide strong and increased support for the grant of consent for the proposal.

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

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