

Energy Consents Unit
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15th February 2025

ECU00004892: GLENVERNOCH WIND FARM

I am writing on behalf of the Partnership Board of the Galloway and Southern Ayrshire UNESCO Biosphere (GSAB) to highlight what it sees as significant contextual issues bearing upon the determination of this application. These issues are not exclusive to the Glenvernoch decision, and the Board is pointing them out in this particular case only because it is the first proposed wind energy development affected by these factors to reach this critical stage in the consenting process. These comments should therefore be seen as applicable to all such schemes rather than as relating only to the Glenvernoch application.

The GSAB does not have the resources or expertise to assess in detail the merits and demerits of the Glenvernoch proposal. Moreover, it recognises the importance and urgency of reducing greenhouse gas emissions in order to restrict the already damaging consequences of climate change. Indeed, for these and other reasons it has hitherto refrained from commenting on any of the numerous wind farm schemes which, like Glenvernoch, lie in the transition zone of the Biosphere. Instead, it adopted in December 2016 a policy statement stating that:

“It is the view of Galloway and Southern Ayrshire Partnership that any wind farm developments within the Core and Buffer zone of the Biosphere would not be suitable or supported due to their adverse impact on the region’s natural environment and rural economy. However, it is the view of the Partnership that wind farm developments within the Biosphere could be acceptable in the transition zone,

where substantial community engagement has demonstrated that the majority of communities are supportive of the proposed development, and it can be shown that the environmental impact of the development is minimal and effective mitigation can be achieved”.

The Partnership Board has, however, noted with growing concern the worrying implications for the nature and quality of the landscapes and other environmental resources in its care of the cumulative impact of the wind farms already built and consented. These consequences extend beyond the impacts of the individual projects themselves, as they increasingly pose questions over the grid and other infrastructure investments that will be required to transmit the energy generated from its source to the point of consumption.

Against this background the Board would like to draw the ECU’s attention to three reasons why in its view it would be premature to determine the Glenvernoch or other similar applications until these critical matters have been settled. The uncertainties needing to be resolved are:

- (i) Whether there is, as proposed, to be a Galloway National Park;
- (ii) Whether the area within which the Glenvernoch wind farm is proposed is to be included within it and (irrespective of that) whether its impacts upon areas that are included within it are acceptable; and
- (iii) What the national planning policy on wind energy development within any new National Parks is to be.

With respect to the first two questions, NatureScot is currently consulting on possible boundaries for a National Park. Of the three options canvassed in its consultation paper, the Glenvernoch site falls within only the most extensive (Option 3). But it is not far distant from areas that are included in both the other options. Given the scale of turbines proposed (200m), it would certainly be highly visible from them.

Furthermore, the Strategic Environmental; assessment of the National Park proposal prepared for the Scottish Government has decisively concluded that a larger one would yield substantially greater benefits than the smaller options presented. In these circumstances it is surely important to safeguard the natural and cultural heritage assets of the former, at least until a decision on designation is reached.

On the timetable currently envisaged, a decision on whether or not to proceed with designating a National Park should be taken and announced by this summer. A draft Designation Order, setting out detailed proposals for the boundary, should be available soon thereafter.

The Scottish Government has also declared its intention to produce proposals for a revised National Planning Framework (NPF4) policy on wind farms in National Parks to a roughly similar timetable. It has of course already made it clear that this policy can be expected to be more accommodating of wind farm development than the effective ban in place in the two existing National Parks. At the same time, however, any such policy must surely have some regard to the high value of the natural and cultural assets recognised in the designation of a nationally protected landscape. It is therefore only reasonable to assume that the tests applied to individual proposals would be more rigorous than those applying outwith such designations. If they were not, the very purpose and value of the designation would be cast in doubt.

Once these two pieces of a revised policy jigsaw are in place, it would be much easier to assess and determine the acceptability of the Glenvernoch proposal and indeed any others falling within the potential area of the proposed National Park. Furthermore, the Partnership Board would very much hope that if a Galloway National Park is designated, it would be given as one of its first priorities the preparation of a strategy designed to guide and pave the way for renewable energy development on whatever scale and of whatever nature is consistent with the guidelines contained in the revised NPF. That, in the Board's view, would be a valuable practical demonstration of the role that the Scottish Government has indicated that it wishes National Parks to play in leading a just transition to a net zero economy and society.

In conclusion, the Partnership Board would like to highlight the fact that in drawing attention to the salience of these matters, it is reflecting the views and concerns of many people locally. In a region that has already accommodated a large volume of wind energy development, there is a strong feeling that more needs to be done to bring greater order to, and to give local communities greater influence over, the far-reaching changes wrought by such development on its landscapes and environment. The perceived "goldrush" atmosphere prevailing hitherto has done nothing to foster public acceptance locally of a form of development that may be essential to meet



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wider societal needs but can be highly intrusive and if not very sensitively approached and undertaken is often deeply resented.

Yours Sincerely

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