

Email: NationalParks@gov.scot

14 February 2025

To Whom It May Concern,

Response to Scottish new National Parks - phase 2 - strategic environmental assessment (SEA): SEA reasonable alternatives report

Scottish Renewables (SR) is the voice of Scotland's renewable energy industry. Our vision is for Scotland to lead the world in renewable energy. We work to grow Scotland's renewable energy sector and sustain its position at the forefront of the global clean energy industry. We represent over 360 organisations that deliver investment, jobs, social benefit and reduce the carbon emissions which cause climate change.

Our members work across all renewable technologies, in Scotland, the UK, Europe and around the world, ranging from energy suppliers, operators and manufacturers to small developers, installers, and community groups, as well as companies throughout the supply chain. In representing them, we aim to lead and inform the debate on how the growth of renewable energy can provide solutions to help sustainably heat and power Scotland's homes and businesses.

SR welcomes the opportunity to provide our members' views on the SEA Environmental Report (ER) for the proposed Galloway National Park. We have significant concerns regarding the robustness of the SEA ER. It does not accurately account for the National Park designation's impact on renewable energy development within the proposed boundary. Nor does it appropriately consider the benefits renewable energy developments have on climate change mitigation, biodiversity, environmental quality, material assets, and human health.

The lack of analysis of renewable energy development within the potential National Park boundary underestimates the positive impacts of the Alternative 4 'do nothing' scenario and overestimates the positive benefits of a National Park in any 'do something' scenario. We are concerned this analysis unnecessarily pits nature against the renewable energy developments required to achieve net-zero targets.

Insufficiently Defined 'Reasonable Alternatives'

The SEA correctly quotes legislative requirements for determining reasonable alternatives to the plan. Unfortunately, this section of the SEA does not go on to explain *how* the identified reasonable alternatives have been defined or how each of them relates to the objectives of the plan (i.e. the designation of a new National Park). It should be noted that the statutory aims of National Parks, in general, are not necessarily the same as the specific plan objectives that should underpin this SEA. The SEA should set out the statutory aims as the

plan objectives and explain how each reasonable alternative has been defined in relation to these aims. This SEA, however, does not.

The SEA states in paragraph 4.14:

'With further reference to climate change mitigation efforts, renewable energy developments are generally permitted in National Parks as long as they do not lead to any significant adverse effects on the qualities for which the area has been designated (see NPF4, policy 4c). The only exception to this is onshore wind which is not generally supported in existing National Parks'.

This statement incorrectly interprets NPF4 by oversimplifying and underestimating the policy requirements a renewable energy proposal must meet to receive consent. This does not consider NPF4 Policy 11d and ignores the test in Policy 4c(i) regarding proposals needing to support the objectives of the designation and its overall integrity.

Because of this misrepresentation of the policy tests renewable energy projects are required to meet to be consented in a National Park, the reasonable alternatives in this SEA have applied inaccurate policy assumptions to their analysis, ultimately undermining the resulting conclusions.

A New National Park: Reducing the Ability for Scotland to Reach Net-Zero

A National Park designation would create a barrier to consenting renewable energy projects. As NPF4 Policy 11b specifically states that onshore wind cannot be developed in a National Park. While there has been reference to a 'bespoke' planning policy for onshore wind in the New National Parks Appraisal Framework Guidance for Nominations, no information about what that bespoke policy might contain is available. Now that regulations are in place for amending NPF4, this policy must be created before a SEA can credibly consider the impact a National Park will have on onshore wind development.

In addition to uncertainty around planning policy for onshore wind, the increased planning bureaucracy and the focus on natural heritage for all planning applications within a National Park designation would become a barrier to the deployment of *all* renewable energy technologies, battery storage, and transmission.

The Dumfries and Galloway Council area has extensive wind resource. This is reflected in the Onshore Wind Pipeline Analysis, done twice annually as a commitment of the Scottish Onshore Wind Sector Deal and most recently [updated in December 2024](#), where 94 S36 projects and 30 Town and Country Planning projects are identified as being in development. Within the originally proposed National Park boundary, there is a total of 1.3GW of pre-construction projects in the pipeline at risk with a National Park designation. That is

significant onshore wind capacity to jeopardise with a National Park designation as the Scottish and UK Governments attempt to achieve net-zero targets. That also does not address the capacity potentially lost from solar or battery storage, which would also be jeopardised with a National Park designation, or the impacts on net-zero targets by missing grid connection dates should grid updates and infrastructure not be available in the anticipated timeline.

The Benefits of Renewable Energy

Renewables bring a suite of benefits in addition to contributing to emissions reduction and net-zero targets. These include Cultural Heritage Enhancement Plans, Peat Management Plans, Habitat Management Plans, Biodiversity Net Gain, Socio-Economic Benefits, and community benefits. Yet the potential loss of renewable energy capacity, the nature and socio-economic benefits that come with those projects, and the loss of the impact on climate change mitigation renewable energy projects in the area are not factored into the SEA in any way.

Nowhere in the SEA are the benefits of renewable energy laid out. There are several policies and agreements in place that underscore and ensure the delivery of nature positive development through renewable energy projects. Renewable energy projects are required to comply with NPF4 Policy 3b, which requires that proposals conserve, restore, and enhance biodiversity. NPF4 Policy 11c requires energy developments to maximise net socio-economic benefit. In the Scottish Onshore Wind Sector Deal, the onshore wind industry has agreed to deliver biodiversity net gain in addition to the emissions reductions renewable energy projects realise.

Renewable energy developers have long been a primary partner with the Scottish Government in restoring peatland, which is also a net-zero priority. They have restored significant amounts of peatland, which the Scottish Government would not have been able to fund from public money. For example, SSE's Viking Wind Farm on Shetland is delivering nearly 260 hectares of peatland restoration. That peatland restoration would not be taking place were it not for the wind farm.

The Scoped SEA Targets

Oversimplifying the impact a National Park designation will have on renewable energy development and ignoring the positive impacts renewable energy projects have on climate change mitigation, nature, and human health leads this analysis to incorrect conclusions.

Climate Change and Biodiversity

Although a National Park designation will have an adverse effect on consenting renewable energy projects, the SEA concludes that the 'do nothing' scenario will have an adverse impact on climate change mitigation and adaptation.

The SEA focuses only on carbon sequestration and ignores renewable energy generation as a climate change mitigation tool. Jeopardising 1.3GW of onshore wind with a National Park designation will not help Scotland mitigate climate change. Sequestration through peatland restoration, woodland creation, and sustainable transportation will not offset the emissions reductions 1.3GW of onshore wind would achieve. Nor is it a zero-sum game—1.3GW and the biodiversity net gain commitments the onshore wind industry has committed to are likely lead to additional peatland restoration. Therefore, the 'do nothing' scenario in which there is more renewable energy development is likely to result in additional peatland restoration not captured in the SEA.

No analysis can legitimately conclude that reducing Scotland's ability to reach net-zero will be a positive effect for climate change mitigation and adaptation: The 'do nothing' scenario will have a positive impact on climate change mitigation.

Environmental Quality and Material Assets

Given the requirements of NPF4 Policy 3b and the Scottish Onshore Wind Sector Deal commitments, renewable energy developments significantly support nature restoration through peatland management plans, habitat management plans, and biodiversity net gain.

The loss of private investment in nature protection in the 'do something' scenarios would have a significant negative impact on a National Park's ability to achieve environmental quality goals. That investment is not accounted for at all in the 'do nothing' scenario.

Human Health

Renewable energy developments provide significant socio-economic benefits from local jobs to community benefit. The loss of that benefit in any 'do something' scenario is not accounted for in the SEA.

The financial benefits of a National Park are a fraction of the benefits that the local area would see with additional renewable energy and transmission developments. A study by BiGGAR Economics, commissioned by ScottishPower Renewables, attached here, outlines the potential loss of GVA, jobs, and community benefit should a National Park limit the consent of only onshore wind in the current planning pipeline.

- Given the current onshore wind pipeline, Dumfries and Galloway could expect to produce by 2035:
 - 3.2GW of onshore wind capacity
 - £925 million GVA (between 2024 and 2035)
 - 624 jobs per year
 - £146 million community benefit payments by 2035
- Should no new onshore wind be developed because of the National Park designation, Dumfries and Galloway could expect to see:
 - A loss of 1.7GW of onshore wind capacity
 - A loss of £543 million GVA
 - A loss of 467 jobs per year
 - A loss of £64 million in cumulative community benefit payments
- Should a National Park allow for repowering but not consenting of new wind farms, Dumfries and Galloway could expect to see:
 - A loss of 1.4GW of onshore wind capacity
 - A loss of £489 million GVA
 - A loss of 397 jobs per year
 - A loss of £62 million in cumulative community benefit payments

This study only looks at the impact of a National Park designation on onshore wind proposals and does not include the socio-economic impact of not consenting solar, battery storage, or transmission projects. It can reasonably be concluded that not consenting other renewable energy proposals would only increase the economic loss to the area in terms of GVA and jobs lost.

Losing 1.3GW of proposed but not yet consented onshore wind energy would forecast a loss of £6.5 million a year in community benefit funding to the area following current Scottish Government guidance. There are many examples of the benefits to the community from current wind farms. ScottishPower Renewables, which operates four wind farms within the originally proposed boundary, has highlighted both in [2020](#) and in [2024](#) examples of what communities have chosen to invest in with community benefit funds.

In addition, the Glenkens & District Trust, which covers land within 'option 1' of this consultation, has awarded £1.3 million in benefits from Blackcraig and Windy Rig wind farms. They state in their [most recent annual report](#): *'Community benefit monies have made a real and tangible difference to our area and we appreciate the support of our donors and the continued work of all our community groups. The availability of these funds can and does make a real difference to the communities we love and is a clear demonstration of the value of place-based decision making'*.

Neglecting to Mitigate

This report does not effectively mitigate the adverse effects of a National Park designation on renewable energy developments and their benefits. There is no evidence that there is a structured process to determine what options or policy language require mitigation or that there is a process for mitigation. There are significant negative impacts to the goals of a National Park designation in this plan that aren't accounted for or mitigated here.

The SEA for the proposed Galloway National Park is deeply flawed. The Scottish Government must revisit the analysis and address these flaws before moving forward with the next steps in the designation process. Not doing so will result in any decision on the designation of the new national park being based on an inaccurate analysis of its benefits.

We welcome any questions you might have about how to correctly interpret NPF4 for renewable energy proposals or how our members benefit nature and communities.

Sincerely,

A handwritten signature in black ink, appearing to read 'Megan Amundson', written in a cursive style.

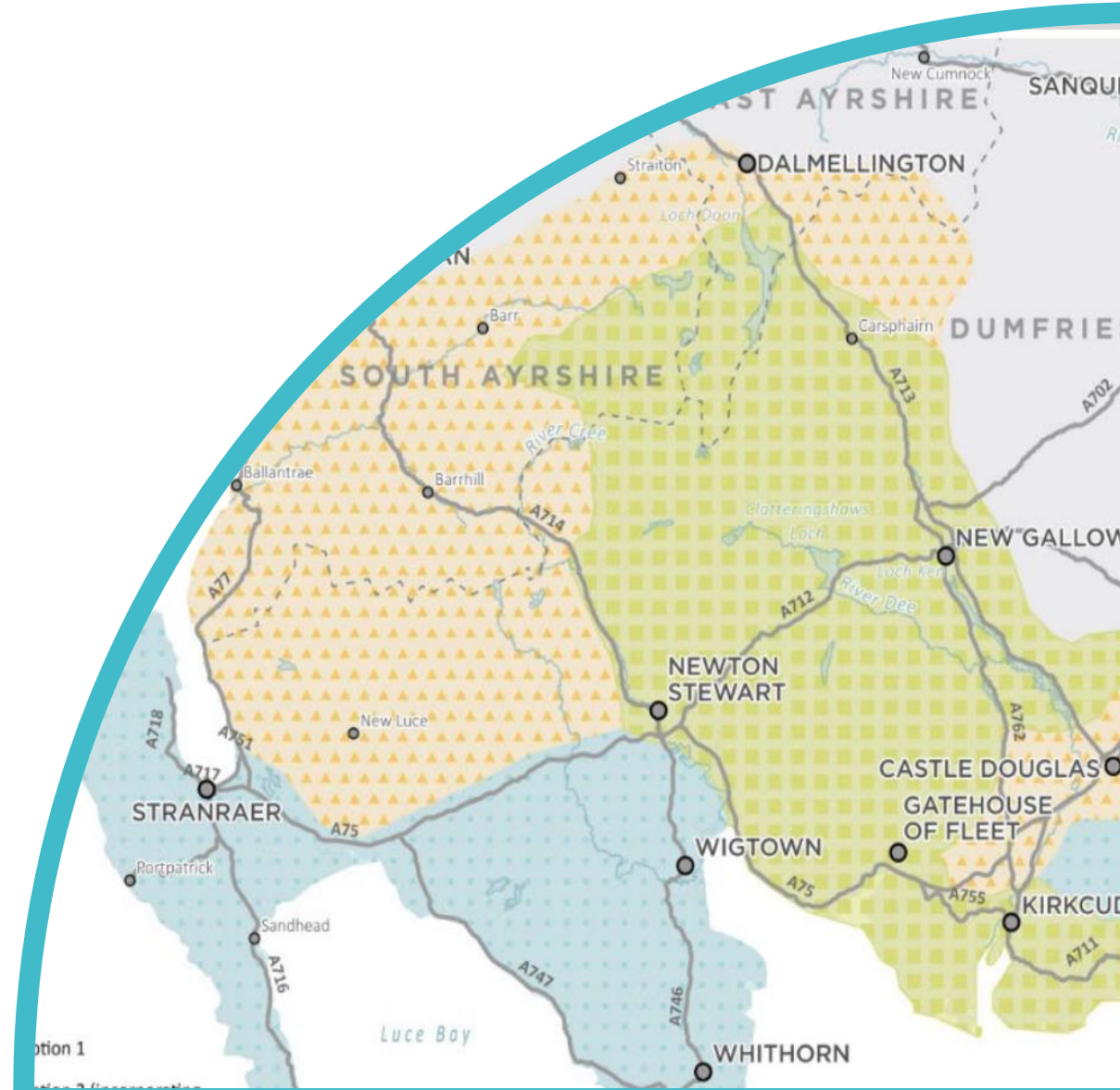
Megan Amundson
**Head of Onshore Wind & Consenting
Scottish Renewables**

Implications of the Proposed Galloway National Park on the Onshore Wind Sector

A Report to



January 2025





Executive Summary

If proposals to establish a new national park in Galloway proceed this will affect the deployment of onshore wind in the region and associated economic activity.

- The creation of a **new national park in Galloway would almost certainly reduce deployment of onshore farms in southwest Scotland** by making it more difficult for developers to secure planning permission for developments near the park. This would reduce the level of economic activity the sector could generate in the region and make it more difficult for Scotland to achieve national targets for the deployment of onshore wind by 2030. The extent of this impact will depend on the nature of the planning regime adopted at the new park.
- If a similar planning regime to Scotland's existing national parks were to be adopted the region could experience a cumulative loss of around **£543 million GVA by 2035**, around 470 fewer jobs/year might be supported at the peak of activity and the region could **miss out on around £64 million in community benefit funding**.
- Under a more lenient planning regime that supported the repowering of existing onshore wind farms the loss of economic activity is still likely to be substantial, amounting to around **£489 million GVA by 2035**. This equates to around 400 fewer jobs at the peak of activity and a loss of around **£62 million in community benefit funding**.
- Whilst this report focuses exclusively on effects on the onshore wind sector other parts of the renewable energy industry (such as grid connection projects) are also likely to be affected. This would further reduce the potential for local economic activity and the achievement of national targets.



Contents

- **Study Background**
 - Introduction
 - Policy context
- **Scenario Analysis**
 - Baseline: Business As Usual
 - Scenario 1: No Formal Support
 - Scenario 2: More Permissive Planning Regime
- **Summary**





Study Background

The Scottish Government is considering creating a new National Park in Galloway.





Introduction

A new National Park is proposed for Galloway. This is likely to affect onshore wind developments in the area.

The Scottish Government is considering creating a new National Park in Galloway. The boundary of the new park has not yet been confirmed but three options are being considered:

- Option 1 – hills and coast
- Option 2 – hills and extended coast
- Option 3 – hills, coast and countryside

The new park is expected to encompass a large part of Dumfries and Galloway and parts of south and east Ayrshire.

NatureScot is leading a consultation on the proposals, which is due to be submitted to the Scottish Government in the Q2 2025.

This analysis has been commissioned to inform SPR's submission to this consultation, highlighting potential impacts on the economy from changes to the consenting of onshore wind developments in the region.



This report assesses the economic impact that could be generated under the following scenarios:

- **Baseline: Business As Usual**
- **Scenario 1: No Formal Support**
 - A new planning regime is established that does not support the development of onshore wind farms.
- **Scenario 2: More Permissive Planning Regime**
 - A new planning regime is established that does not support the development of new onshore wind farms but does permit repowering of existing projects.

Impacts are presented in terms of the **Gross Value Added (GVA)** and **employment (jobs)** in **Dumfries and Galloway** under each scenario.



National Park Designation

National Parks have a formal role in the planning system. This can range from a full planning authority to a statutory consultee.

The National Parks (Scotland) Act 2000 grants the Scottish Parliament the power to create National Parks in any part of Scotland it deems appropriate to:

- conserve and enhance the natural and cultural heritage of the area,
- promote sustainable use of the natural resources of the area,
- promote understanding and enjoyment of the area by the public, and
- promote sustainable economic and social development of the area's communities.

An important feature of the legislation is that it enables National Park Authorities to have a formal role in the planning system.

The legislation provides for a range of options from a full planning authority through to statutory consultee status.

Both of Scotland's existing park authorities are responsible for preparing the local development plan for their areas. Loch Lomond & the Trossachs National Park Authority has responsibility for determining planning applications and the Cairngorms National Park Authority has the power to 'call in' key planning proposals so it can make the decision rather than the local authority.

It has not yet been determined what planning powers any new park would have.





National Planning Policy

National Park designation would almost certainly have a major effect on new wind farm development in the area.

Scotland's National Planning Framework (NPF4) is the strategic framework for planning decisions in Scotland. Policy 11(b) of NPF4 relates to energy developments. It states that proposals for wind farms in National Parks will not be supported.

Policy 4(c) of NPF4 relates to natural places and may also be relevant to potential wind farm developments in any new National Park.

This policy states that development in National Parks will only be acceptable where the objectives of the park designation will not be compromised, and any adverse effects are clearly outweighed by social, environmental and economic benefits of 'national importance'.

While the roll out of renewables is of critical importance to Scotland's economy, the socio-economic benefits of any individual wind farm are unlikely to be nationally important. This implies National Park designation would almost certainly have a major impact on new wind farm development in the area.

“Development proposals for wind farms in National Parks and National Scenic Areas will not be supported.”

NPF4, policy 11(b)



Scenario Analysis

The following slides present the economic impact from onshore wind developments in Galloway under three scenarios.





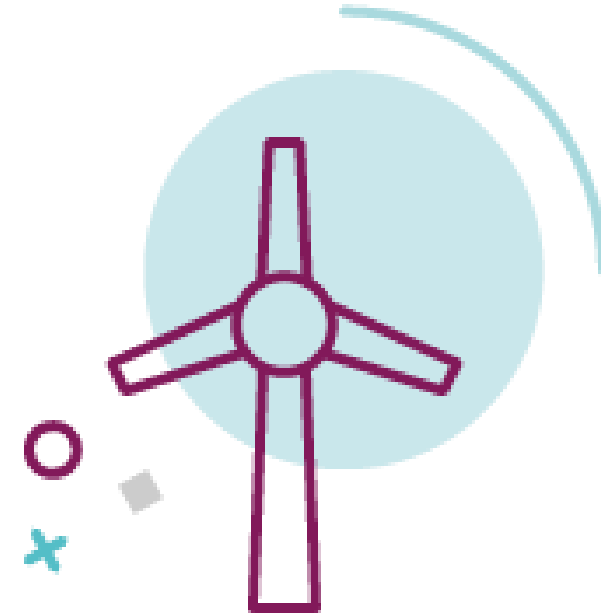
Scenarios

The economic impact generated by the onshore renewable energy sector depends on the number of developments that are approved or repowered.

This report assesses the economic impact that could be generated under the following scenarios:

- **Baseline: Business As Usual**
- **Scenario 1: No Formal Support**
 - A new planning regime is established that does not support the development of onshore wind farms.
- **Scenario 2: More Permissive Planning Regime**
 - A new planning regime is established that does not support the development of new onshore wind farms but does permit repowering of existing projects.

Each scenario depends on the number of new projects developed and existing projects repowered.





Methodology

The analysis in this report was based on BiGGAR Economics extensive experience of assessing the impacts of onshore wind developments in Scotland

The analysis is based on the total installed capacity deployed (MW) under in each scenario and includes impacts from:

- development;
- construction;
- repowering construction; and
- operation

Based on the level of deployment in each of the above categories, the **gross value added (GVA)** and **employment** that would be supported from the level of activity was assessed (inclusive of direct, indirect, and induced impacts).

The methodology was based on BiGGAR Economics' extensive experience assessing the economic impacts of onshore wind farms, including in Dumfries & Galloway supplemented with information from SPR on projects in the local area.

In addition to GVA and employment impacts, the analysis also considered the level of **community benefit funding** that could be generated in each scenario. Data on the levels of community benefit payments made by developers in the region was based on previous analysis by BiGGAR Economics for South of Scotland Enterprise and on the assumption that any new developments would contribute the recommended **£5,000 per MW in** community benefit.



Baseline: Business As Usual

If no new national park is created in Galloway, onshore wind developments in the region would continue as planned, with up to 3,232 MW of capacity by 2035.

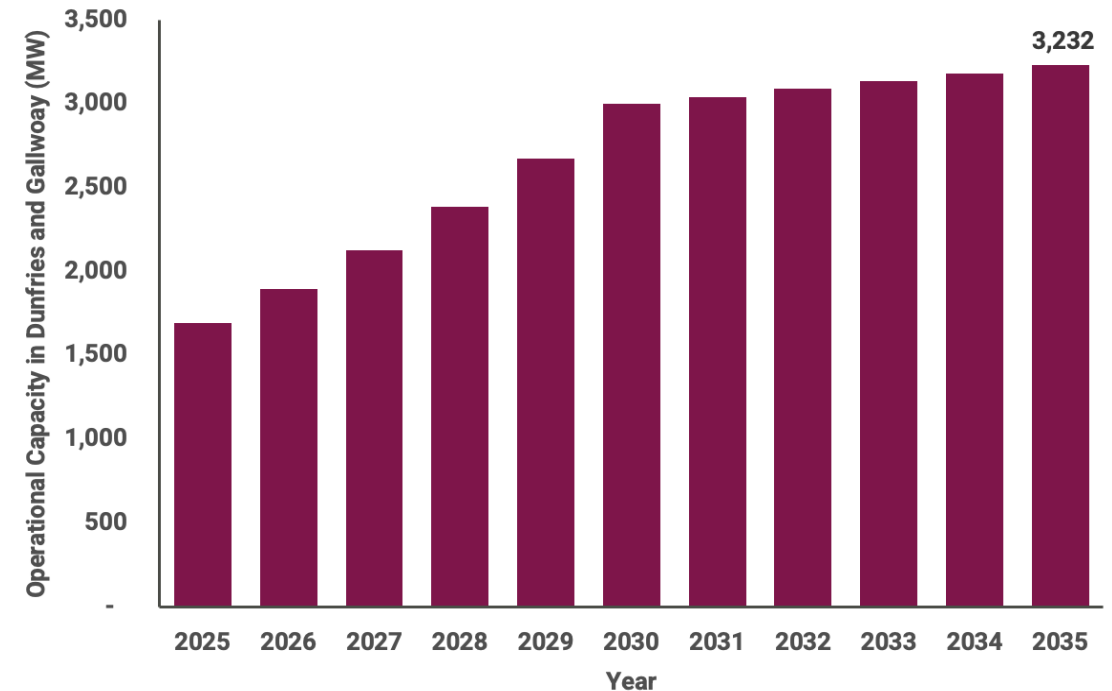
Based on projections produced by the Department for Energy Security and Net Zero, it is estimated that by 2035, Dumfries and Galloway could generate up to **3,232 MW** of energy from onshore wind.

This includes energy from wind farms that are already operational, are currently being planned and any that may be constructed or repowered over this period.

The operation of the developments would support further economic activity and social value in the region through the payment of community benefit funds.

If plans for the new national park were not to proceed, it is likely this would continue to be the case.

Deployment over time, MW (Baseline scenario)





Baseline: Business As Usual

Deployment will increase over coming years to reach 2030 renewable energy targets.

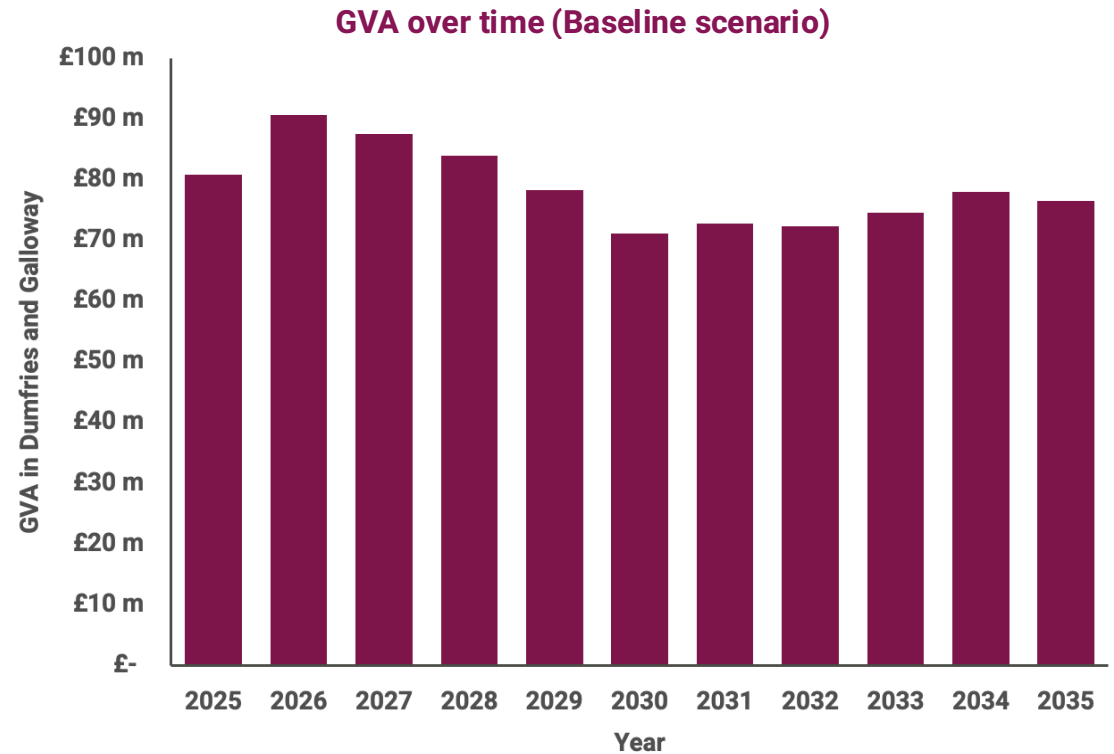
Under this scenario it is estimated that by 2035 onshore wind developments in Dumfries and Galloway would support a total economic impact in the region of:

- **£935 million GVA** (*cumulative impact between 2024 and 2035*)

At the height of activity this could support up to **624 jobs** per year.

As shown in the graph, the largest share of impact will occur over the next five years as there is a construction push towards achieving 2030 renewable energy targets. The impacts from operational activity following this is likely to be lower due to the nature of this day-to-day activity.

Based on the estimated project pipeline, **community benefit payments** in the region could amount to **£146 million by 2035**.





Scenario 1: No Formal Support

If no formal support is specified for new or existing onshore wind developments near the park, it is likely developers would face increased challenges in gaining planning approval.

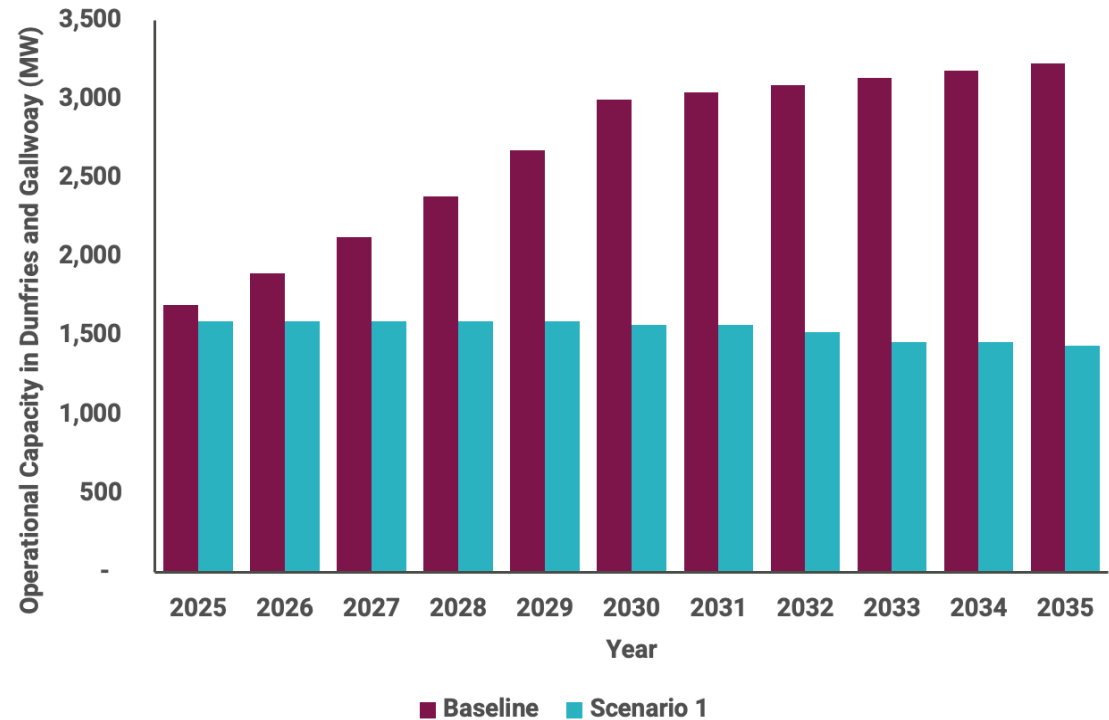
If no formal support is provided for onshore wind developments in the vicinity of the national park, developers would likely face increased challenges in the planning approval process, resulting in refusal of planning permission. This would affect the number of future developments and repowering and resulting economic activity.

This scenario has been modelled as including the:

- operational impact of existing developments
- no repowering of existing developments
- no new developments

Under this scenario, by 2035 deployment would be **1,438 MW**.

Deployment over time, MW (Scenario 1: No Formal Support)





Scenario 1: No Formal Support

Activity would be generated from existing operational wind farms only.

Under this scenario it is estimated that by 2035 onshore wind developments in Dumfries and Galloway would support a total economic impact in the region of:

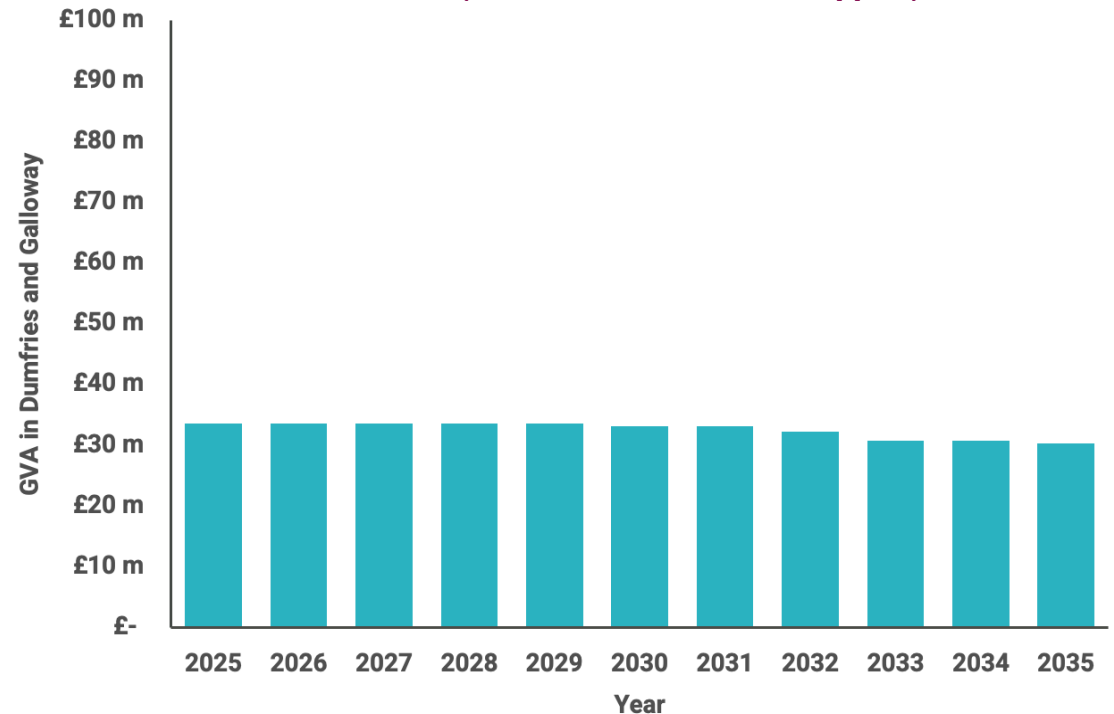
- **£392 million GVA** (*cumulative impact between 2024 and 2035*)

At the height of activity this could support up to **157 jobs** per year.

The impacts would be generated solely by existing operational developments, with the value of this decreasing over time as operational lifetimes are reached and developments are not repowered.

Based on the estimated project pipeline, **community benefit payments** in the region could amount to **£82 million by 2035**.

GVA over time (Scenario 1: No Formal Support)





Scenario 2: More Permissive Planning Regime

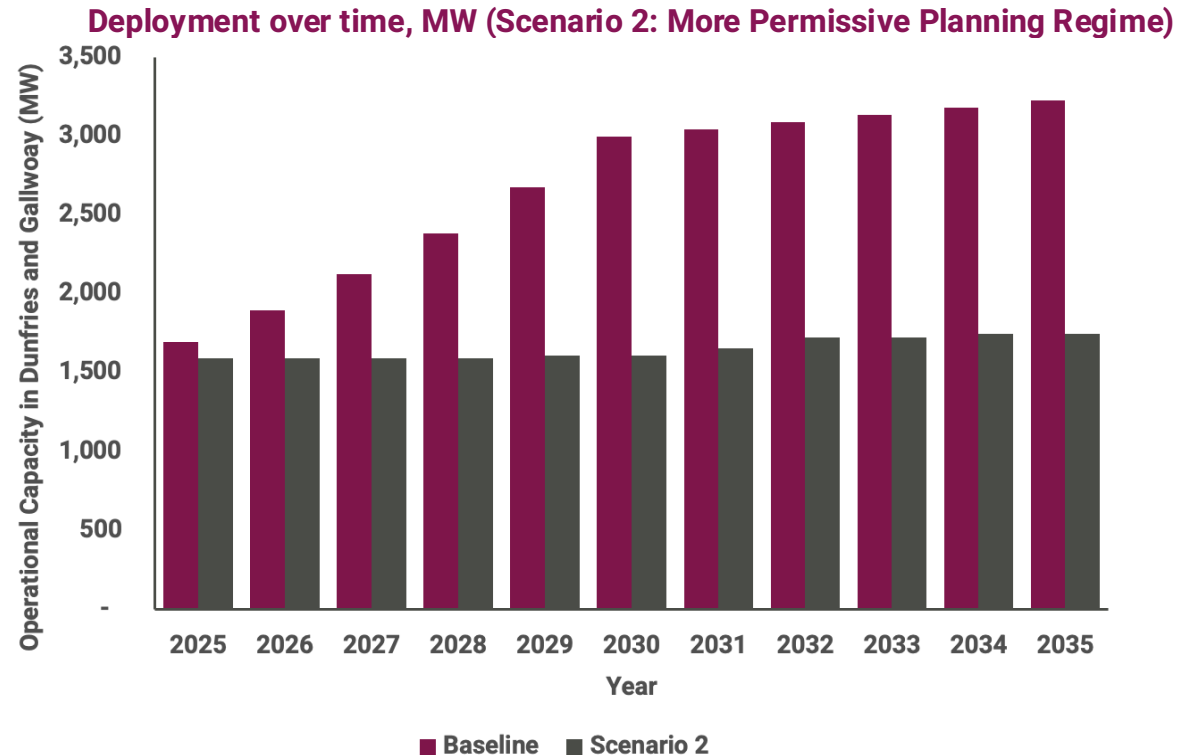
Existing renewable energy developments near the national park would have restrictions on repowering.

If a less restrictive planning regime were adopted that supported existing developments and permitted some repowering it is likely developers would still face greater opposition and more challenges securing planning permission. It is likely this would result in fewer existing projects being repowered after their 25-year lifetime.

This scenario was modelled by assuming that:

- **the operational impacts from existing developments would be maintained**
- **50% of operational projects would be repowered, with an increase in the installed capacity**
- **No new projects would proceed**

Under this scenario, by 2035 deployment would be **1,747 MW**.





Scenario 2: More Permissive Planning Regime

Activity would be generated from the operation and repowering of existing wind farms.

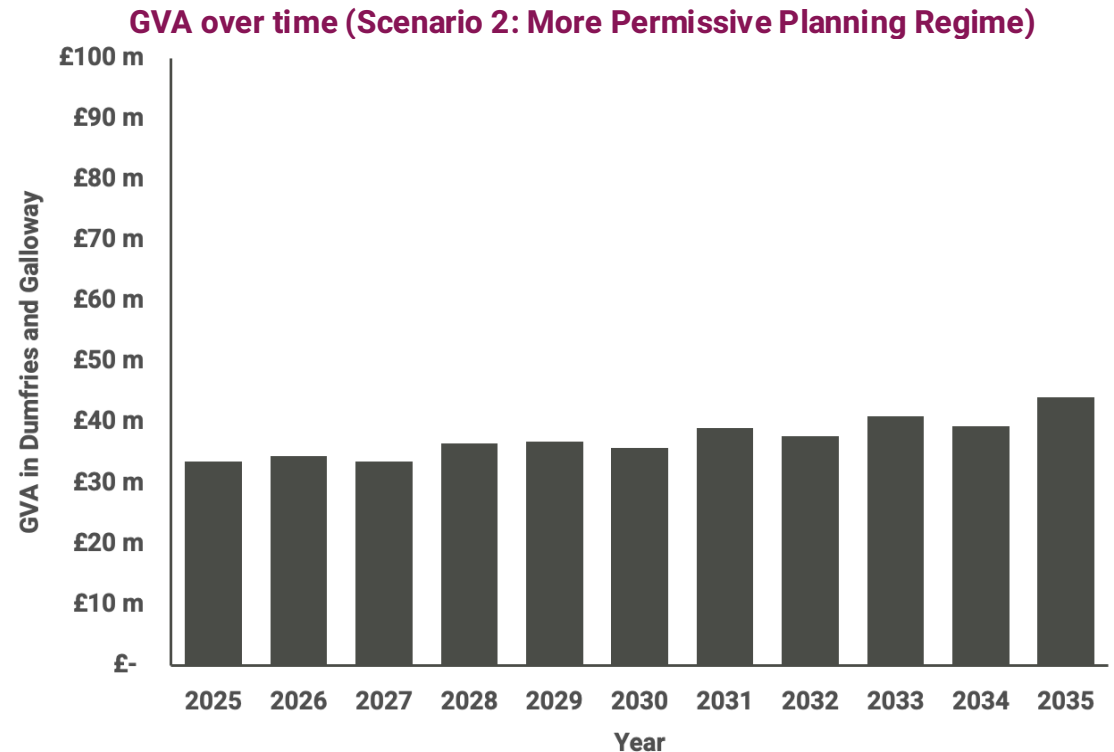
Under this scenario it was estimated that by 2035 onshore wind developments in Dumfries and Galloway would support a total economic impact in the region of:

- **£447 million GVA** (*cumulative impact between 2024 and 2035*)

At the height of activity, this could support up to **227 jobs** per year.

In this scenario impacts would be driven by the operation and repowering of existing developments only, with the impact rising over time as this activity occurs.

Based on the estimated project pipeline, **community benefit payments** in the region would amount to **£84 million by 2035**.





Summary

Under both future scenarios, the creation of a national park in Galloway would reduce the economic impact that is generated from onshore wind developments in the region, in comparison to the baseline position.





Summary

The table below presents the total impact generated by the onshore wind sector in Dumfries and Galloway by 2035 under each of the three scenarios.

	Deployment (by 2035)	GVA (£m) <i>(cumulative impact 2024 – 2035)</i>	Jobs <i>(maximum annual FTE jobs 2024 - 2035)</i>	Community Benefit Funding (£m)
Baseline: Business As Usual	3,232	935	624	146
Scenario 1: No Formal Support	1,438	392	157	82
<i>Reduction in activity under scenario 1</i>	<i>1,794</i>	<i>543</i>	<i>467</i>	<i>64</i>
Scenario 2: More Permissive Planning Regime	1,747	447	227	84
<i>Reduction in activity under scenario 2</i>	<i>1,485</i>	<i>489</i>	<i>397</i>	<i>62</i>



Summary

If proposals to establish a new national park in Galloway proceed this will affect the deployment of onshore wind in the region and associated economic activity.

- **Based on current projections, Dumfries and Galloway will be generating up to 3,232 MW from onshore wind by 2035.** This would generate around **£935 million GVA over the next ten years**, and support up to **624 jobs** per year at the height of activity.
- It is highly likely that **creating a new national park in Galloway would reduce this level of economic activity** as onshore wind developers would face increased challenge and opposition to developments in the vicinity of the park. This would likely be focussed on the premise that onshore wind development would have a detrimental effect on the landscape and visual amenity of the area.
- In the case of either no formal support for the sector being declared, or support in terms of the repowering of existing developments located in the area, deployment levels would be less than the baseline position. This would result in **reduced economic activity in the region, a reduction in the scale of community benefit payments paid to local communities, and challenges to meeting national targets for the deployment of the sector by 2030.**
- Whilst this report focuses on onshore wind specifically, **similar implications are likely to be felt across the wider renewables sector**, specifically on large-scale capital infrastructure projects such as grid connection in the area. This would further reduce the potential for local economic activity and the achievement of national targets.



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