

Our Ref 25/00339/FULM
7 October 2025

Beth Thomas
Arthian Ltd
Mabbett House
11 Sandyford Place
Glasgow
G3 7NB

Dear Beth

Construction of a solar farm of up to 49.9MW, substation buildings, access tracks, security measures, associated infrastructure and works, and landscape and biodiversity enhancements at Land Surrounding Fallaws of Arbirlot, Arbirlot, Arbroath

With reference to the above application, and our recent teams meeting, I undertook to follow up with a written response to the application.

Having consulted with internal and external consultees, Angus Council are of the broad view that the application site has some capacity for solar development, but that additional information and amendment is necessary to bring the proposal in line with the relevant planning policies and guidance.

In this respect, I would like to offer the following observations regarding the application and associated documentation.

Comments on the proposed development:

I am concerned that the proposed layout does not fully consider the requirements of The Council's Strategic Landscape Capacity for Solar Energy in Angus (https://www.angus.gov.uk/planning_and_building/environment_and_development_planning/strategic_landscape_capacity_assessment_for_solar_energy_in_angus) Supplementary Guidance.

The capacity assessment includes general guidance in relation to solar PV development which is relevant across Angus. Amongst other considerations, it emphasises the importance in retaining rectilinear patterns, avoiding visual amalgamation of fields, and where landscape character has been eroded by the amalgamation of fields, development may provide opportunity to reinstate a field boundary structure. It also states that existing woodland, forestry, tree lines and hedges can all increase the capacity of a landscape to accept solar PV development.

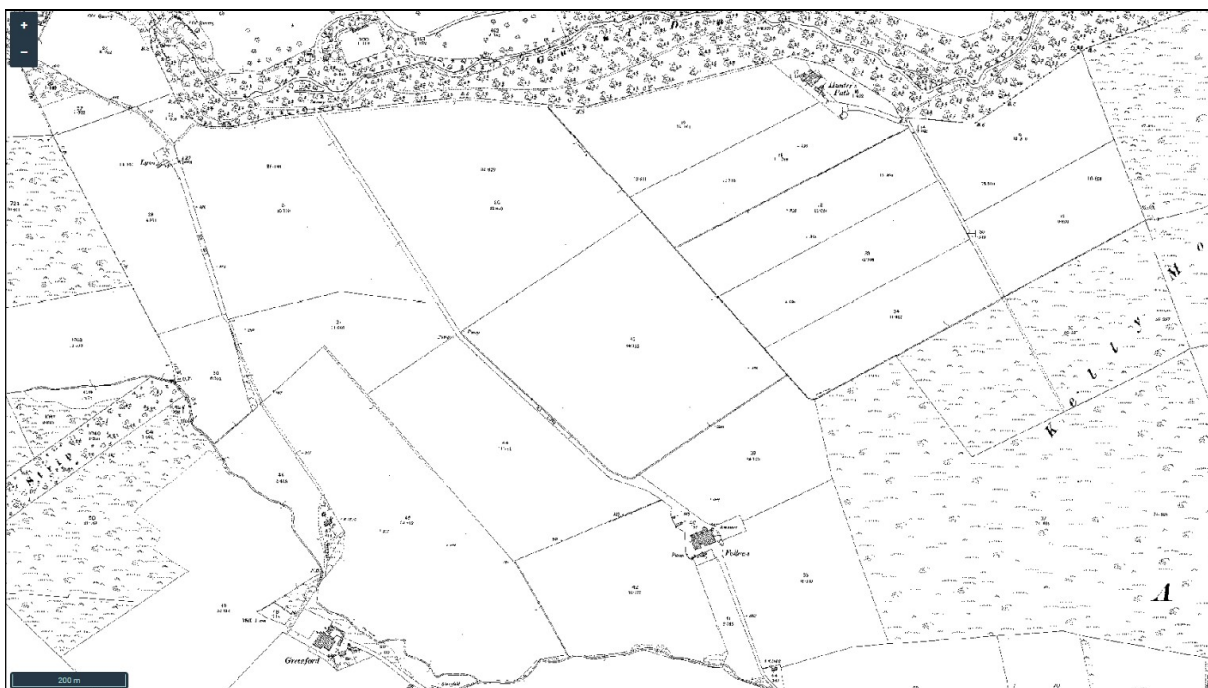
Figure 3 in the supplementary guidance shows that landscape capacity for TAY 13(iii) Dipslope Farmland (Redford Farmland) has medium capacity for solar PV development, describing it as a large, intensively managed elevated arable farmland area set above the North Sea and surrounded by similar farmland. Gently

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rolling or undulating, with a NW-SE dip towards the sea and lower farmland, the sub-area has large or medium rectilinear arable fields, many where field boundaries have been removed. There are only occasional woodland blocks in this sub-area, the most notable being around Guynd designed landscape. Views are generally open, although tree cover around Guynd restricts views. Development within this sub-area can be prominent at a distance. Whilst rectilinear arable field patterns can increase capacity for solar PV development, the lack of woodland cover and frequent absence of field boundaries substantially reduces capacity to low in more open areas. Development proposals should seek to reinforce the established field patterns and use existing woodland as a landscape structure within which to locate development. Development on higher more open areas and on sloping landforms where visibility is likely to be high should be avoided.

In principle, the Council consider that the site has capacity for solar development, but that, in accordance with the Strategic Landscape Capacity Study for Solar Energy, we would require that the built mass be better visually broken up. Typically, this would be through the reinstatement of historical field boundaries which would be planted with hedges a hedgerow trees, but as discussed, the site does not appear to lend itself to this approach.



Map from c.1900

The application site is already broken up by the route of overhead lines and an underground pipeline, along with open drains along boundary lines. Furthermore, there are existing access tracks that pass through the site. These existing features either follow the historic field boundaries or effectively supersede them by introducing new constraints.

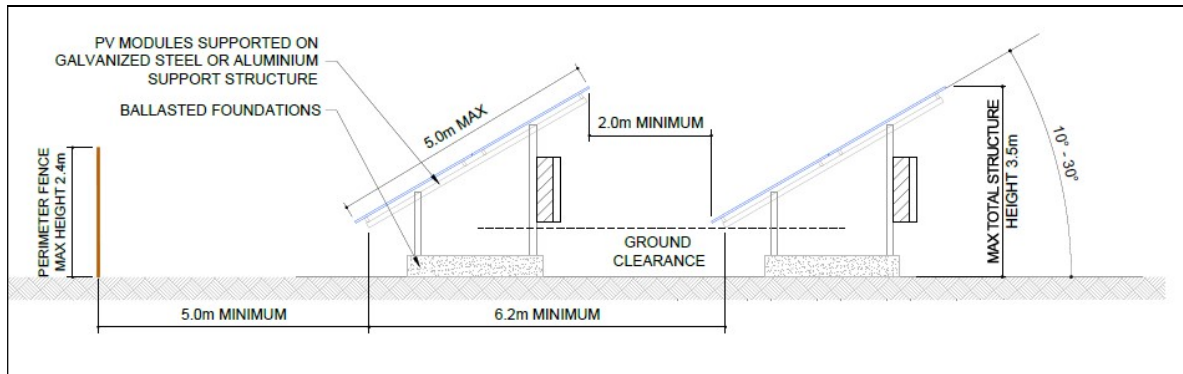
Nevertheless, in accordance with the spirit of the supplementary guidance, aimed at reducing the visual impact of solar developments by breaking up the overall

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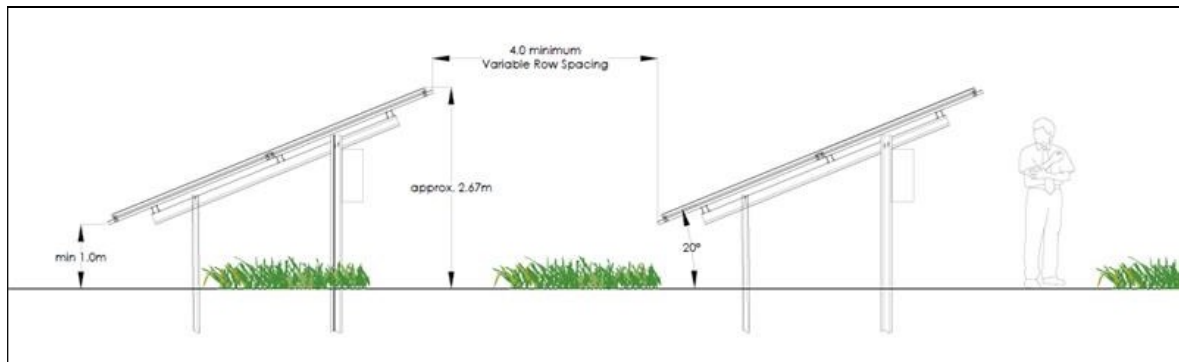
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mass, more should be made of these existing breaks in terms of landscaping. Simply leaving a clear space around the overhead lines, for example, does little to break up the industrial appearance of the development, and arguably the cumulative impact of both features without mitigation is more significant.

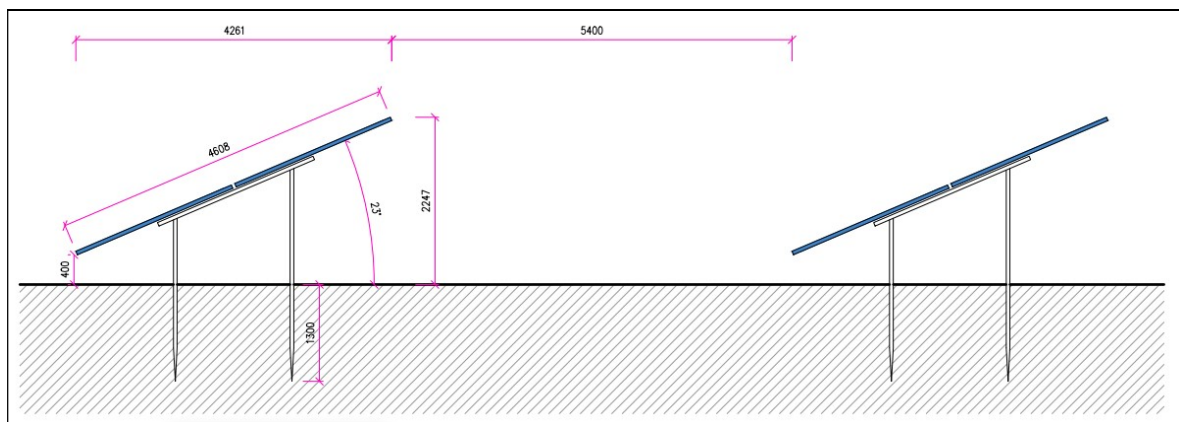
In addition, the Council considers that the proposed height of the panels (3.5m) make it difficult to mitigate adverse effects through tree and hedge planting (on boundaries and within site). The spacing between the rows of panels, at 2m, is also significantly less than other sites that have been proposed in Angus. For context, I have pasted examples from a number of sites below:



Bonnyknox, Arbirlot (25/00339/FULM) Pending



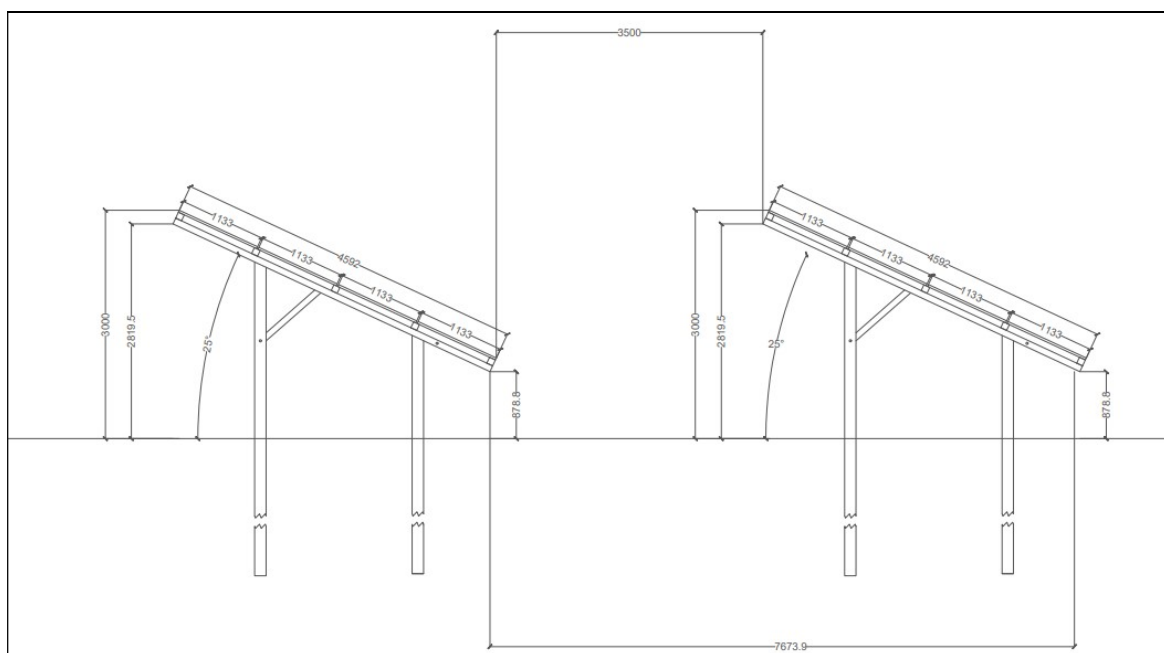
Haughs of Cossans, Glamis (25/00337/S36) Pending



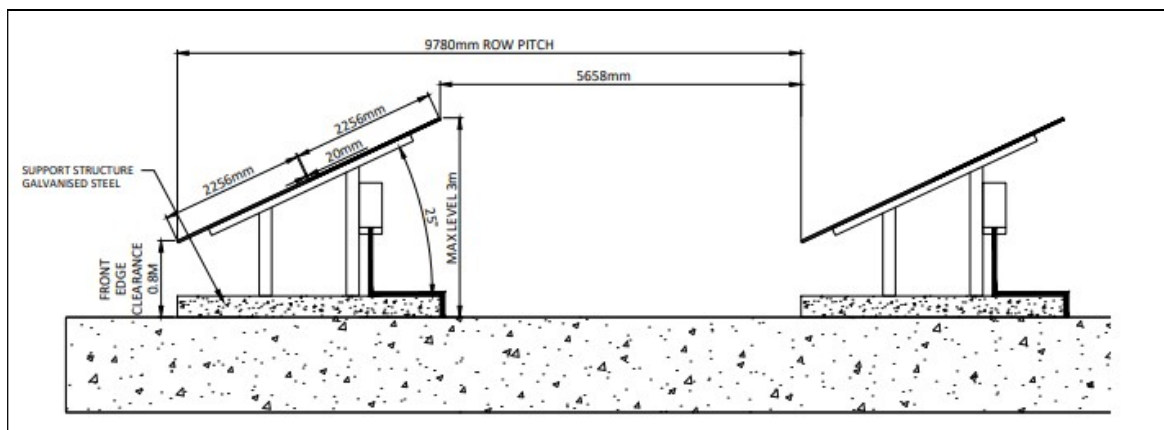
Denfield (24/00589/FULL) Granted

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Kinnell Farm, Friockheim (23/00484/FULL) Granted



Cotton of Lownie (23/00393/FULM) Refused (refused on appeal)

The size and spacing of the panels are of particular concern around the periphery of the site, especially where they bound both sides of existing tracks – both the access to Hunters Path and the track to the north of Fallaws Farm.

The Council's Countryside Access Officer has noted that although there are no core paths immediately affected by the proposed development, the two tracks do offer public access through the site, potentially providing a link to more intensely used paths around the Guynd designed landscape to the north.

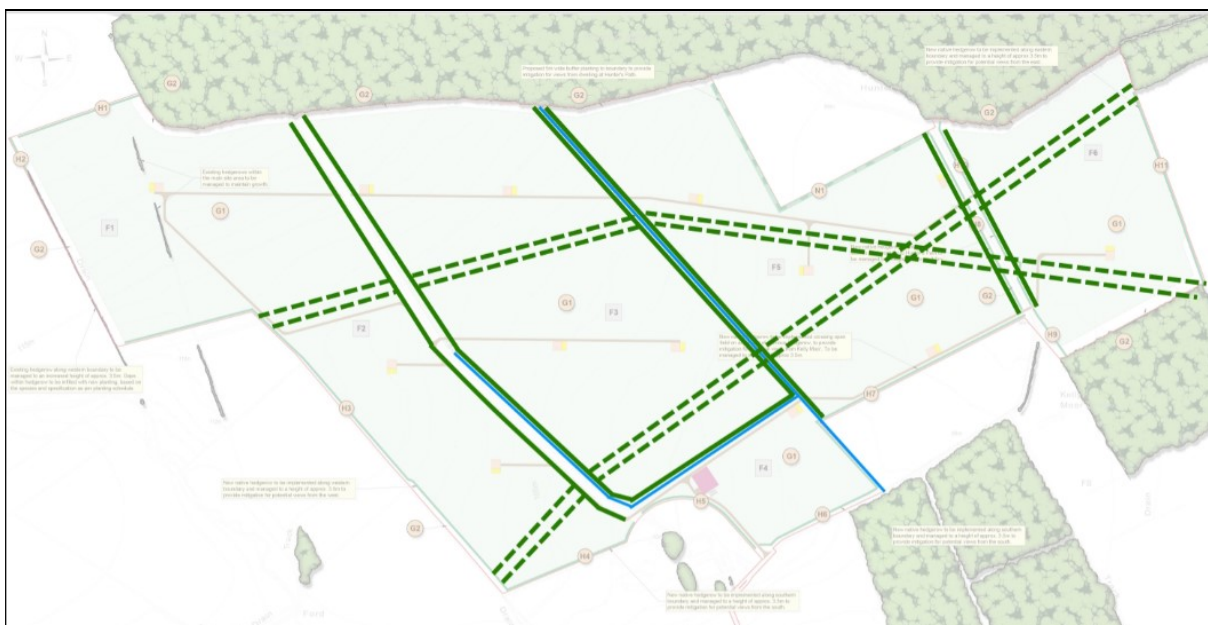
Combined with existing infrastructure that crosses the site, there is a risk that the development, as presented, could lead to an unacceptable industrialisation of the landscape. In order to minimise and mitigate this, these access routes must have a meaningful stand off and landscape buffer so as to avoid a tunnelling effect.

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The track to north of Fallaws farm also appears to have an open ditch along the east side. There is also an open ditch that splits the site from north to south, and the two are linked by a ditch to the north of the farm. The eastern ditch appears on site to have a degree of hedgerow and trees along part of its length. This offers an opportunity for riparian planting long the lengths of these ditches to create the breakup of the mass of panels sought by the supplementary guidance, but also to offer the most biodiversity gain by forming wildlife corridors with significant habitat creation. Such planting would also improve the potential enjoyment of the track to the north of Fallaws Farm.

I have also previously noted the uncertainty over the deliverability of landscaping across or in proximity of the routes of existing overhead lines and underground pipeline, and what the implications wayleaves might have on landscape design. The required stand off from these pieces of existing infrastructure may offer an opportunity for additional structural planting to further visually break up the site and also enhance wildlife corridors.



Potential for additional landscaping to break up visual mass and enhance biodiversity.

In addition to this – and again drawing comparisons to other schemes proposed and approved in and around Angus – the design appears to require more access tracks and local substations with associated hardstanding. Other projects appear to attach inverter equipment to the rear of the rows of panels, negating the need for multiple compounds and structures. Accessibility is, however, improved on other sites by wider spacing between the rows of panels. Where new tracks are required, these should follow existing or reinstated field and landscaping boundaries.

I am also concerned about the proposed palisades fencing for the site. It is accepted that compound areas will require to be protected by secure fencing, but the majority of solar farms are enclosed by wire mesh fencing to reduce the visual

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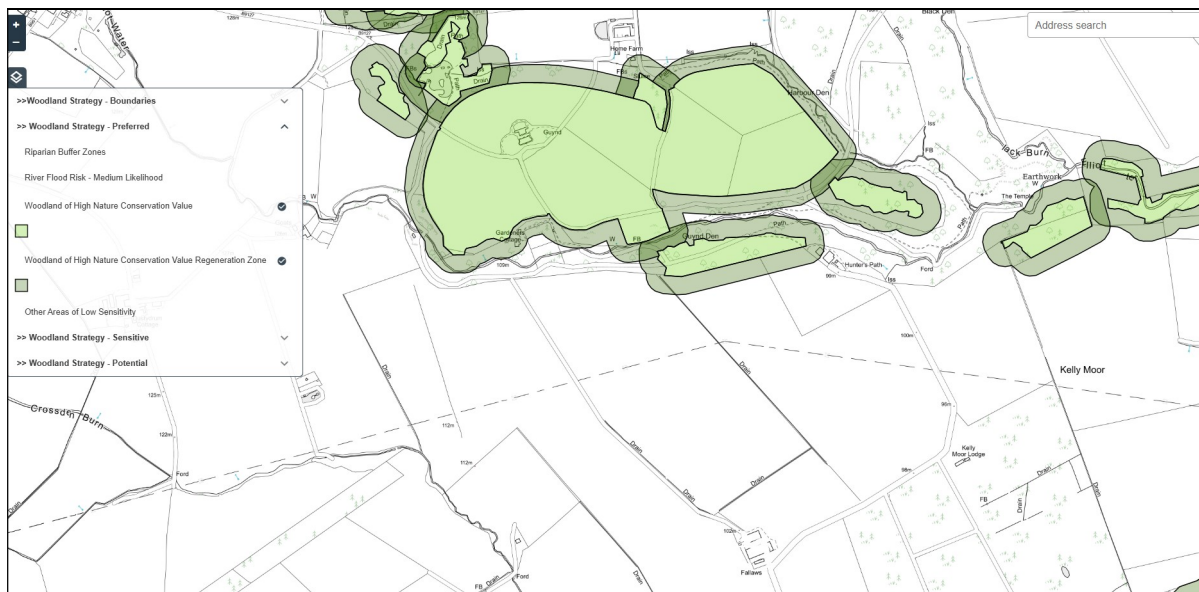
impact. Furthermore, such peripheral fencing must include mammal gaps to allow the free movement of wildlife through the site.

The Councils Forestry & Woodland Strategy 2024-2034 identifies statutory Woodland of High Nature Conservation Value.

https://www.angus.gov.uk/media/angus_forestry_and_woodland_strategy_2024_to_2034.pdf.

The strategy identifies regeneration zones associated with these areas. We would therefore seek that those areas within the site identified in the strategy be proposed for the natural regeneration of woodland.

<https://shared.xmap.cloud/?map=48a44a7d-1524-41e7-a157-866bd78a4397>



Excerpt from the Forestry & Woodland Strategy 2024-2034

In regard to visual impact, therefore, additional information is required, and additional landscaping is necessary.

- Justification for the size and spacing of the panels themselves, along with the need for so much new access track and so many individual compounds. A reduction in the height of the panels is requested, and removal of unnecessary tracks and compound areas.
- Consideration of reducing panel sizes further where they are closest to the two N-S tracks to reduce the tunnelling effect.
- Clarification of wayleaves and a revised landscaping plan to reflect what can and cannot be delivered due to existing infrastructure.
- Additional landscaping along tracks and in particular watercourses/ditches, with appropriate riparian species to maximise biodiversity gain.
- Assessment of the boundary treatments to reduce harsh visual impact and to ensure permeability for wildlife.
- Woodland planting in line with The Councils Forestry & Woodland Strategy 2024-2034.

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In addition to the landscape impact of the proposed development, there remain outstanding objections from SEPA, SSEN and National Gas Transmission, which I have forwarded to you previously. In summary, SEPA require the following, in regard to the amended access. They have asked for information on the following:

- i. dimensions and photographs of the existing culvert
- ii. clarification on whether the proposed new track and culvert will replace the existing track and culvert, or whether the proposed new track and culvert are in addition to the existing track and culvert.
- iii. topographic detail on the ground level of the road where the existing culvert is plus the new ground level of the proposed access track.
- iv. further analysis of flows in Rottenraw Burn including use of more than one method of flow estimation/justification as to why the chosen flow is the most representative for the catchment, as well as incorporation of an appropriate allowance for climate change.

SSEN have also raised a holding objection relating to a lack of detail regarding the continued use of the overhead lines. Similarly, NGT have objected on the grounds of potential conflict with the high-pressure gas pipeline which runs through the site. I understand that you have spoken to them directly, but I will require a response so that I can reconsult them and allow them to remove their objection formally.

With regard to cumulative impacts, it would be valuable to have a statement that explores how people moving through the area will experience the cumulative impact of renewable energy developments, rather than just consider intervisible developments from one point. This should consider built, consented, and currently proposed developments.

Upon receipt of the required information and amendments, it may be necessary to renotify neighbours and open the public consultation for a period of time (most likely 14 or 21 days).

The statutory determination date for the application is the 31 October, which is not now achievable. As explained at our meeting, due to staffing issues we have long lead in times to our committees of around 5 weeks. We have a Development Standards Committee meeting scheduled for the 16 December, and therefore I would be grateful if we could agree an extension of time until the 19 December 2025 to allow us to aim for that meeting. If this is not achievable, we can discuss a further extension thereafter.

I look forward to hearing from you with regard to the next steps.

Yours sincerely

Ben Freeman

Planning Officer - Development Standards

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