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TABLES

INTRODUCTION

4.1 This Chapter outlines the renewable energy and planning policy that is considered to be relevant to the proposed development in order to set the proposed development in the context of the adopted plans, objectives and strategies at national and local levels.

4.2 The policies and provisions relevant to the development are highlighted. In line with the Institute of Environmental Management and Assessment (IEMA) Guidelines (Ref. 4.1), the detailed analysis of the policies is provided separately to this EIA Report. A more detailed analysis of the policies is therefore contained in the Planning Statement, which is included in the application submission to Scottish Ministers.

4.3 The EIA Report does not include an assessment of the proposed development's accordance with the planning policy framework or other relevant considerations.

4.4 This EIA Report is prepared in respect of a development which will be considered in the context of Section 36 of the Electricity Act 1989 (Section 36 Application). In the consideration of the application, the Scottish Ministers have a duty to fulfil the requirements of Schedule 9 (paragraph 3) of the Electricity Act 1989. This requires the Scottish Ministers to consider the '*desirability of preserving natural beauty, of conserving flora, fauna and geological or physiographical features of special interest and of protecting sites, buildings and objects of architectural, historic or archaeological interest*'. In addition, the Scottish Ministers are required to assess whether the Applicant has fulfilled the requirement to '*do what he reasonably can to mitigate any effect which the proposals would have on the natural beauty of the countryside or on any such flora, fauna, features, sites, buildings or objects.'*

4.5 In the case of Section 36 Applications, the role of the Development Plan is not the same as in the case of the Town and Country Planning (Scotland) Act 1997. The test set out in Section 25 of the Town and Country Planning (Scotland) Act 1997, which sets out that development must accord with the terms of the Development Plan, is not engaged in the case of a Section 36 application. Whilst for such an application the Development Plan does not have primacy in the decision-making process, it may nonetheless be a material consideration in respect of determination of the application. Through the EIA process, the Applicant has sought to develop a scheme that takes account of the duties set out in Schedule 9 of the 1989 Act. The matters that are raised in Schedule 9 have been considered in the EIA process and the findings are presented in this EIA Report.

RENEWABLE ENERGY POLICY

4.6 In order to understand the context against which the proposed development is being promoted, it is considered important that international, national and Scottish Government commitments to the development of renewable energy technology and approach to climate change is understood, especially given the wind farm is being considered under the Electricity Act by the Scottish Government. The most recent and relevant documents are identified in the following text and are considered in greater detail in the Planning Statement. Many of the policies include targets for 2020. It is acknowledged that the proposed development would not be operational at that time. However, for reasons set out in the Planning Statement, it is considered likely that the current targets will not be met. It is expected that the policies and targets will be updated in due course and are anticipated to further promote and build upon current renewable energy targets. For this reason, it is considered that the proposed development would make a valuable contribution to

renewable energy targets post 2020.

International Context

4.7 In order to understand the need for renewable energy generation in the United Kingdom (UK), it is important to consider the international drive towards addressing climate change. The policy framework for renewable energy development in the UK is largely motivated by international agreements on the reduction of emissions of greenhouse gases.

4.8 The United Nations Framework Convention on Climate Change (UNFCCC) came into force on 21 March 1994 and sought to stabilise the atmospheric concentrations of greenhouse gases at "safe levels". The Convention provides an overall framework for international government efforts to address the challenge posed by climate change. Currently, there are 197 parties signed up to the Convention. The Convention embodies a series of review mechanisms. The first of these, the Kyoto Protocol, was adopted in December 1997. As a result of this Protocol, the European Union (EU) was obliged to secure an 8% reduction in greenhouse gas emissions from 1990 levels by 2012.

4.9 The United Nations Climate Change Conference in Doha, Qatar (COP 18), took place in 2012 when the Kyoto Protocol was amended so that it would continue as of 1 January 2013.

4.10 COP 21, which was held in Paris in December 2015, resulted in a legally binding global climate change target agreed by all 196 member parties with the aim of capping climate change well below 2°C of warming.

4.11 COP 24, the fourteenth session of the Conference of the Parties serving as the meeting of the Parties to the Kyoto Protocol (CMP 14), and the third session of the Conference of the Parties serving as the meeting of the Parties to the Paris Agreement (CMA 3), was held in Katowice in December 2018. The purpose of the conference was to discuss and implement plans about combating climate change, including the details of how the Paris Agreement will work after it enters into force in 2020.

EU Renewable Energy Directives

4.12 The EU reduction target, as a result of the Kyoto agreement, was the subject of an EU Renewable Energy Directive (2001/77/EC). The UK's commitment to the protocol was a reduction of greenhouse gases to 12% below the 1990 levels by 2012.

4.13 Directive 2009/28/EC created, at clause 13, mandatory national targets consistent with a 20% share of energy from renewable sources by 2020. The Directive, clause 15, advises that it is necessary to translate the European Community target into individual targets for each Member State, with due regard to an equitable allocation. This takes into account the different starting points of the Member States and their potential, including the current level of energy from renewable sources and the existing energy mix. The UK target for its share of energy from renewable sources, in gross final consumption of energy, is 15% by 2020.

A 2030 Framework for Climate and Energy Policies

4.14 In January 2014, the European Commission presented 'A 2030 Framework for Climate and Energy Policies' (Ref. 4.2), stating that the target of a 40% emissions reduction below the 1990 level would be met through domestic measures alone. An EU-wide binding target for renewable energy of at least 27% of energy consumption by 2030 was introduced which will be enforced through a new governance system based on national energy plans.

UK Context

4.15 The main responsibilities for policy development, in relation to energy production and regulation in Scotland, are retained by Westminster. This part of the Chapter sets out in summary the UK Government's approach to renewable energy generation since 2008. This provides the framework for the development of renewable energy generation across the UK and provides a background for the emergence of Scottish renewable energy generation and wind energy policy.

Climate Change Act

4.16 The Climate Change Act became law on 26 November 2008. Scotland is a partner in delivering the UK emissions reduction target set out in the Climate Change Act 2008.

4.17 Two key aims underpin the Act; these are:

- to improve carbon management and help the transition towards a low carbon economy in the UK; and
- to demonstrate strong UK leadership internationally.

4.18 The Act introduced for the first time a legally binding framework to tackle the challenges of climate change. The Act sets legally binding targets for the UK to reduce carbon dioxide emissions by at least 80% by 2050, relative to 1990 levels. Energy generated from renewable sources was identified as a key component meeting the challenge of reducing carbon emissions and the fight against climate change.

National Renewable Energy Action Plan

4.19 The National Renewable Energy Action Plan for the UK was published in July 2010 (Ref. 4.3), and advises that the UK needs to radically increase its use of renewable energy. It states that:

"The UK Government believes that climate change is one of the gravest threats we face, and that urgent action at home and abroad is required…..The development of renewable energy sources, alongside nuclear power and the development of carbon capture and storage, will also enable the UK to play its part in international efforts to reduce the production of harmful greenhouse gases."

2050 Pathways Analysis

4.20 The 2050 Pathways Analysis (published July 2010, updated 2013 (Ref. 4.4)) presents a framework through which to consider some of the trade-offs and choices which will have to be made over the next 40 years. It is system wide and covers all parts of the economy and all greenhouse gas emissions in the UK. It demonstrates that it is possible for the 80% emissions reduction target to be

achieved in a range of ways. The document invited feedback on the choices that were to be made at the time.

UK Renewable Energy Roadmap

4.21 The UK Renewable Energy Roadmap (published July 2011 (Ref. 4.5)) sets out a comprehensive action plan to speed up the UK's deployment and use of renewable energy and to place the country on a path to achieving the targets for 2020, whilst reducing the cost of renewable energy over time. It identifies eight technologies, including onshore wind that have the potential to assist the UK in meeting the targets in a cost-effective way or that offer the greatest potential for the future.

4.22 The UK Renewable Energy Roadmap Update 2013 (published November 2013 (Ref. 4.6)) advises that since the first UK Roadmap, the UK is on track to meet the first interim target towards the ambitious target of 15% renewable energy by 2020. The Executive Summary reaffirms the Coalition Government's commitment to increasing the deployment of renewable energy across the UK. The Executive Summary also notes that the UK Government projections of energy consumption in 2020 has been revised downwards, and the estimated amount of renewable energy required to meet the 15% target of renewable energy production (for heat, transport and electricity) has also been revised downwards in line with this projection of energy consumption.

The Fifth Carbon Budget

4.23 In November 2015, the Committee on Climate Change (CCC) advised the Westminster Government to set the fifth carbon budget to reduce UK greenhouse gas emissions in 2030 by 57% relative to 1990 levels. In June 2016, that advice was accepted. At this time, provisional figures showed that in 2015 UK emissions were 38% below 1990 levels (Source CCC).

4.24 In June 2016, the CCC laid its annual progress report before Parliament. That report emphasised the need then to bring forward policies and proposals that would achieve the levels of reduction set out in the fifth carbon budget.

4.25 To meet these targets, the Government has set five-yearly carbon budgets which currently run until 2032. They restrict the amount of greenhouse gas the UK can legally emit in a five year period. The UK is currently in the third carbon budget period (2018 to 2022). The need to bring forward policies and proposals that would achieve the levels of reduction is set out in the fifth carbon budget.

UK Carbon Plan

4.26 The UK Carbon Plan December 2011 (Ref. 4.7) sets out how the Government proposes to tackle climate change and build a green economy through specific, practical action across government, month by month and department by department. The Plan is set in the context of Scotland's role in leading the way to a low carbon society, explaining what is meant by a low carbon society and economy, and why Scotland is ideally placed to be at the forefront of this transition.

Reducing UK Emissions: 2018 Progress Report to Parliament

4.27 Reducing Emissions and preparing for Climate Change 2018 Progress Report to Parliament (The 2018 Progress Report) (Ref. 4.8) is the ninth and most recent report to Parliament on progress in reducing emissions to meet carbon targets, as required under the Climate Change Act 2008. In this report, the Committee set out four key messages to Government to put emissions reductions on

track, based on the lessons of the last decade, as follows:

- support the simple, low-cost options;
- commit to effective regulation and strict enforcement;
- end the chopping and changing of policy; and
- act now to keep long term options open.

4.28 The 2018 Progress Report advises that overall, UK emissions are down 43% compared to the 1990 baseline, while the economy has grown significantly over the same period. It advises that most of this reduction is due to excellent progress in reducing emissions from electricity generation, noting that the reductions in other sectors have stalled.

4.29 The foreword of the 2018 Progress Report notes that since 2013 emissions outside the sectors of power and waste have plateaued. The Committee have chosen the 2018 Progress Report to send a strong message to the Government, *"Act now, climate change will not pause while we consider our options. And act in the consumer interest: pursue the low-cost, low-risk options, like onshore wind, and enforce the standards that will reduce emissions from vehicles and buildings, where consumers have been cheated by misleading industry claims."*

4.30 The Executive Summary of the 2018 Progress Report advises that the UK is entering a new decade of action to address climate change. It advises that thus far the *"governance framework under the Climate Change Act has worked to deliver overall UK emissions reduction, but a much tougher challenge is presented by the fourth and fifth carbon budgets."* It further advises that the UK is not on course to meet the legally binding fourth and fifth carbon budgets.

Scottish Context

4.31 Tackling climate change is a devolved matter and therefore the Scottish Government has a responsibility to set policy to ensure compliance with targets set at EU and UK level. To encourage the production of renewable energy in 2011, the Scottish Government introduced a '2020 target' for the production of renewable energy as a percentage of the total gross annual electricity consumption. This 2020 target for renewables production has steadily increased from 40% to 50% in November 2007 and further upwards to 80% in September 2010, due to developments in the sector and changing expectations, particularly for the deployment of offshore wind. As of May 2019, the target for 2020 remains at 100% of Scotland's electricity demand to be generated from renewable sources.

4.32 In order to set the context for the need for renewable energy development in Scotland, it is important to understand the obligations that Scotland has to generate renewable energy. The Climate Change Delivery Plan: Meeting Scotland's Statutory Climate Change Targets was published in 2009, setting out the high level measures required in each sector to meet Scotland's statutory climate change targets to 2020. The Climate Change (Scotland) Act was passed in August 2009, creating a statutory framework for greenhouse gas emission reductions and required Scottish Ministers to set annual targets for Scottish emissions from 2010 to 2050. The following text identifies key Scottish Renewable Energy targets and policy that are relevant at the current time.

The 2020 Renewable Routemap for Scotland Update 2015

4.33 In September 2015, the Scottish Government published the 2020 Routemap for Renewable Energy

in Scotland Update 2015 (Ref. 4.9) The foreword of this document advised that provisional figures show that renewable sources generated 49.8% of gross electricity consumption in 2014. While this suggested that Scotland was on target to meet the interim target of 50% by 2015, it was clear that Scotland should not underestimate the challenge of meeting the 2020 target of 100% renewable generation.

4.34 The document is clear that onshore wind has a pivotal role in delivering the 2020 renewable energy targets for Scotland. It confirms that the Scottish Government policy on wind farm applications strikes a careful balance between making the most of Scotland's renewable energy potential and protecting environmental issues and residential amenity.

Electricity Generation Policy Statement 2013

4.35 The Scottish Government published the Electricity Generation Policy Statement (EGPS) 2013 (Ref. 4.10). The EGPS sets out the pathway to meeting the Scottish Government target of delivering the equivalent of at least 100% of gross electricity consumption from renewables by 2020. It sets out how Scotland currently generates electricity, and the changes needed to meet Scottish Government targets and deliver a low carbon generating mix.

4.36 Paragraph 5 of the Executive Summary of the EPGS advises that the EPGS is constructed around a number of relevant targets and related requirements, which include the following:

"delivering the equivalent of at least 100% of gross electricity consumption from renewables by 2020 as part of a wider, balanced electricity mix, with thermal generation playing an important role though a minimum of 2.5 GW of thermal generation progressively fitted with Carbon Capture and Storage (CCS); and enabling local and community ownership of at least 500 MW of renewable energy by 2020."

Reducing Emissions in Scotland 2018

4.37 The seventh report on Scotland's progress towards meeting emission reduction targets, as requested by Scottish Ministers under the Climate Change (Scotland) Act 2009, was published in September 2018 (Ref. 4.11) by the Committee on Climate Change. The 2018 Report assessed latest emission trends across the economy and for energy supply; homes and communities; business and the public sector; transport; agriculture; rural land use and forestry; and waste.

4.38 The report concluded that Scotland met its 'net' emissions annual target in 2016. The target was 44.9 MtCO2e, while Scotland's actual emissions were 41.5 MtCO2e. It advised that Scottish net emissions were 45% below 1990 levels in 2016, and Scotland is currently outperforming the interim target for at least a 42% reduction in net emissions by 2020.

4.39 The Report advised that many sectors have not seen significant reductions in CO2 emissions in the last few years and more needs to be done outwith electricity generation in order to continue meeting future targets.

4.40 Climate Change Plan, the Third report on Proposals and Policies 2018-2032 (Ref. 4.12), is the third report on proposals and policies for meeting Scotland's annual greenhouse gas emissions targets that the Scottish Ministers must lay before the Scottish Parliament as required by the 2009 Act.

4.41 CCP 2018 outlines the Scottish Government revised target of reducing greenhouse gas emissions

by 66% by 2032. The reduction figure is to be measured against the 1990 baseline figures. The CCP 2018 envisages that by 2030 Scotland's electricity system will be wholly decarbonised with an expectation that electricity will be supplying a growing share of Scotland's energy needs, e.g. transport and heat.

Scottish Energy Strategy 2017

4.42 The Scottish Government published the Scottish Energy Strategy in December 2017 (the SES) (Ref. 4.13). The SES sets out the Scottish Government's vision for the future energy system in Scotland, for the period to 2050. The strategy is designed to provide a long term vision to guide detailed energy policy decisions over the coming decades. It articulates the priorities for an integrated system-wide approach that considers both the use and the supply of energy for heat, power and transport. The main document was published alongside three policy statements. Those documents are:

- Onshore Wind Policy Statement;
- Local Heat & Energy Efficiency Strategies and District Heating; and
- Scotland's Energy Efficiency Programme (SEEP).

4.43 The main points from the SES and accompanying documents, as they are relevant to the proposed development, are summarised from paragraphs 4.46 to 4.53.

4.44 The SES sets out the 2050 vision for energy in Scotland is to have a *"flourishing, competitive local and national energy sector, delivering secure, affordable, clean energy for Scotland's households, communities and businesses".* The vision is centred around six priorities, including the following:

- *"innovative local energy systems which empower communities; and*
- *exploiting Scotland's huge renewable energy resources".*

4.45 The SES advises that for Scotland to meet the domestic and international climate change targets, the Government will set a new 2030 'all-energy' target for the equivalent of 50% of Scotland's heat, transport and electricity consumption to be supplied from renewable sources.

4.46 The SES advises that onshore wind development is essential to Scotland's transformation to a fully decarbonised energy system by 2050 and brings opportunities which underpin our vision to grow a low carbon economy and build a fairer society.

4.47 The SES notes that the Scottish Government want to *"see a significant increase in shared ownership of renewable energy projects in Scotland – putting energy into the hands of local communities, and delivering a lasting economic asset to communities across Scotland".*

4.48 The ambition is for at least half of newly consented renewable energy projects by 2020 to have an element of shared ownership. The Scottish Government believe that *"Shared ownership will play a key part in helping to meet our targets of 1GW of community and locally-owned energy by 2020 and 2GW by 2030."* The Scottish Government *"expect community involvement in onshore wind developments to continue to play a vital role in reaching these targets."*

4.49 The Onshore Wind Policy Statement (the OWPS) (Ref. 4.14) is one of three policy statements accompanying the SES and was published in December 2017. The OWPS has been prepared to

reaffirm the existing Scottish Government's onshore wind policy set out in previous publications. It includes separate sections on key priority areas as follows:

- route to market;
- repowering;
- developing a strategic approach to new development;
- barriers to deployment;
- protection for residents and the environment;
- community benefits; and
- shared ownership.

4.50 The OWPS states that Scotland will continue to need more onshore wind developments in order to meet renewable energy targets. Also highlighted in the OWPS is an acknowledgement by the Scottish Government that wind farm design is moving in the direction of bigger turbines and that larger turbines should be supported where appropriate.

4.51 The OWPS outlines the Scottish Government's position that new onshore wind projects should be developed at no additional subsidy cost to consumers, adding that some limited market intervention is required to protect projects against variations in the wholesale price of power.

4.52 Shared ownership is promoted in the OWPS, with developers encouraged to include elements of shared ownership within their proposals. The OWPS reiterates the Scottish Government's target for at least 50% of newly consented renewable energy projects to have an element of shared ownership by 2020. The OWPS refers to the Scottish Government's 2015 'Good Practice Guidance for Shared Ownership of Onshore Renewable Energy Developments', indicating that this guidance should be used by developers when working with communities on this matter. Further to this, the OWPS highlights the letter issued by the Chief Planner in 2015, to the Heads of Planning, which stresses the relationship between shared ownership and net economic benefit in the SPP.

Climate Change (Emissions Reduction Targets) (Scotland) Bill

4.53 The Scottish Government introduced a new Climate Change Bill to Parliament on 23 May 2018 with even more ambitious targets than The Climate Change (Scotland) Act 2009. The proposals include setting targets based on actual emissions, increasing the 2050 target to 90% emissions reduction (up from 80%), and making provisions for a net-zero greenhouse gas emissions target to be set when the evidence becomes available. A number of technical amendments designed to improve the transparency of the targets and functioning of the Act are also being considered. The Bill will reaffirm the Scottish Government's commitment to focusing Government and public services on creating a more successful country, with opportunities for all of Scotland to flourish, through increasing sustainable economic growth.

4.54 On 2 May, amendments to the new Climate Change Bill were lodged to set a legally binding target of net-zero greenhouse gas emissions by 2045 at the latest, with Scotland becoming carbon neutral by 2040. Scotland will therefore not only have to meet the net-zero target for 2045, but also have to reduce emissions by 70% by 2030 and 90% by 2040. These are currently the most ambitious statutory targets in the world for these years.

A Climate Emergency

4.55 In May 2019, the Scottish Government declared a climate emergency. At the same time in Westminster, the then Environment Secretary acknowledged a climate change emergency. In a speech to the Scottish Parliament, the Climate Change Secretary stated:

"The Climate Change Committee has been stark in saying that the proposed new targets will require "a fundamental change from the current piecemeal approach that focuses on specific actions in some sectors to an explicitly economy wide approach. To deliver the transformational change that is required, we need structural changes across the board: to our planning, procurement, and financial policies, processes and assessments. And as I've already said, that is exactly what we will do."

4.56 She went onto say that:

"subject to the passage of the Planning Bill at stage 3, the next National Planning Framework and review of the Scottish Planning Policy will include considerable focus on how the planning system can support our climate change goals."

4.57 The speech to parliament highlighted the advice received by the Scottish Government from the UK Committee on Climate Change, emphasising this advice was being taken forward via amendments to the Climate Change Bill.

Net Zero: The UK's Contribution to Stopping Global Warming

4.58 Net Zero: The UK's Contribution to stopping global warming was published by the Committee on Climate Change (CCC) in May 2019 (Ref. 4.15). It was prepared at the request of the devolved governments of Scotland and Wales and the UK Government, to reassess the UK's long term emissions targets. The Foreword of the Report advises that the net-zero target meets the UK's obligations under the Paris Agreement and responds to the urgent need for action highlighted by the IPCC in the 2018 Special Report on 1.5°C of global warming.

4.59 The Report advises that the CCC welcomes strongly the UK Parliament's decision, and the corresponding decisions of the devolved administrations to enshrine net zero in law. These are identified as positive steps which are considered to be of "*fundamental consequence for the future path of our economy, our society and the climate. Carbon neutrality has now become a mainstream goal*".

4.60 The Report is clear that more challenging targets will not, on their own, result in a reduction in emissions, they need to be supported by new plans which are able to deliver the targets and that "*climate change adaptation is a defining challenge for every government, yet there is only limited evidence of the present UK Government taking it sufficiently seriously*".

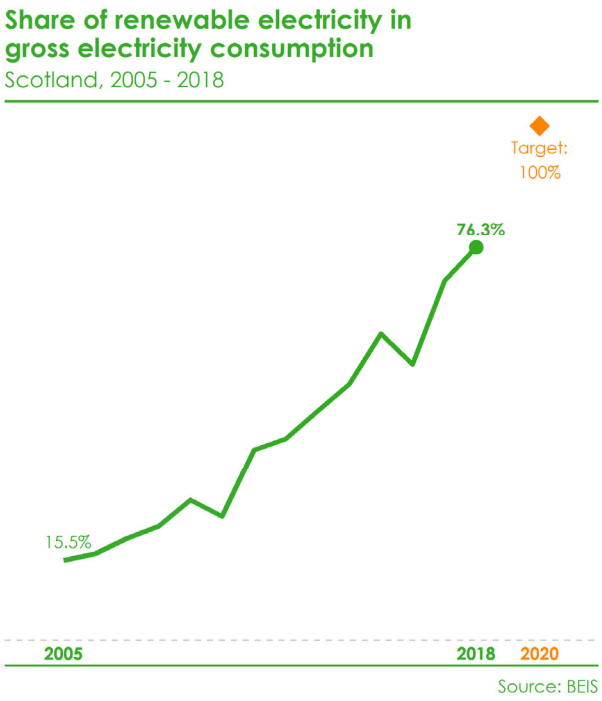
Progress Towards Targets

4.61 The 2020 100% electricity target is for approximately 16GW of installed renewables capacity. As noted in paragraph 4.6, it is acknowledged that the proposed development would not be operational at that time. However, for reasons set out in the Planning Statement, it is considered likely that the current targets will not be met. It is expected that the policies and targets will be updated in due course and are anticipated to further promote and build upon current renewable

energy targets, reaffirming a commitment to 100% of electricity to be produced by renewable means, all in a context where other sectors are expected to rely more heavily on electricity (e.g. transport and heat), thereby requiring a target which is likely to exceed 16GW. For this reason, it is considered that the proposed development would make a valuable contribution to renewable energy targets post 2020.

4.62 The Scottish Government estimates that in 2018, renewable sources generated the equivalent of approximately 76.3% gross electricity consumption (Energy Statistics for Scotland Q4 (Scottish Government 2019, (Ref. 4.16)). Graph 4-1 shows the position for the 2018 figures (latest available).

Graph 4-1
Renewable Electricity in Scotland



Source: Energy Statistics for Scotland – Q4 Figures

OTHER NATIONAL POLICY AND MATERIAL GUIDANCE

National Planning Policy and Guidance

4.63 Material considerations relevant to the proposed development include the following documents:

- Scottish Planning Policy (June 2014);
- The National Planning Framework 3 (June 2014);
- Onshore Wind Turbines Specific Advice Sheet (updated May 2014);
- PAN 1/2011 Planning and Noise (March 2011);
- PAN 2/2011 Planning and Archaeology (July 2011);
- PAN 1/2013 Environmental Impact Assessment (August 2013);

- PAN 51 Planning, Environmental Protection and Regulation (October 2006);
- PAN 60 Planning for Natural Heritage (January 2008);
- PAN 69 Planning and Building Standards Advice on Flooding (August 2004);
- PAN 75 Planning for Transport (August 2005); and
- PAN 79 Water and Drainage (September 2006).

National Planning Framework 3 (NPF3)

4.64 There is high level support for the promotion of renewable energy developments throughout many parts of NPF3 (Ref. 4.17). Chapter 3 of NPF3, 'A low carbon place' identifies that planning will play a key role in delivering the Scottish Government commitments set out in Low Carbon Scotland: the Scottish Government's report on proposals and policies. The priorities which are set out in this strategy set a clear approach which is consistent with Scottish climate change legislation.

4.65 The introduction states the Scottish Government's ambition to achieve at least an 80% reduction in the emission of greenhouse gases by 2020. Paragraph 3.1 states that "*the priorities identified in this spatial strategy set a clear direction of travel which is a consistent with our world leading climate change legislation.*"

4.66 Paragraph 3.7 of NPF3 states that the planned approach to onshore wind energy development has ensured that the proposed development largely avoids internationally and nationally protected areas. It is also recognised that, whilst opinions about onshore wind in particular locations can vary, there is strong public support for wind energy as part of the energy mix.

4.67 Paragraph 3.9 of NPF3 makes it clear that the Scottish Government wants to continue to capitalise on the wind resource of Scotland.

4.68 NPF3, at paragraph 18 refers to the 2009 Climate Change Act which sets a target of reducing greenhouse emissions by at least 80% by 2050, and an interim target of reducing emissions by at least 42% by 2020. This target has now been met, however the Scottish Government has announced further carbon emission targets in its new Climate Change Plan, Third Report on Proposals and Policies 2018-2032. This sets out the requirement, in section 44 of the 2009 Act, for all public bodies to act in the following ways:

- in the best way calculated to contribute to the delivery of emissions targets in the 2009 Act;
- in the best way calculated to help deliver the Government's climate change adaption programme; and
- in a way that it considers is most sustainable.

Scottish Planning Policy (SPP)

4.69 SPP (Ref. 4.18) creates a presumption in favour of development that contributes to sustainable development. Sustainable development is focussed on throughout the SPP. Paragraph 28 advises that:

"the planning system should support economically, environmentally and socially sustainable places

by enabling development that balances the costs and benefits of the proposal over the longer term. The aim is to achieve the right development in the right place; it is not to allow development at any cost."

4.70 Paragraph 29 of SPP advises that planning policies and decisions should be guided by a number of principles, including:

- giving due weight to net economic benefit; and
- making efficient use of existing capacities of land.

4.71 Onshore wind is specifically considered in SPP starting at paragraph 161. SPP advises that Planning Authorities should set out in the Development Plan a spatial framework identifying areas likely to be most appropriate for onshore wind farms where there is the greatest potential for onshore wind development. Table 1 of SPP is as presented in Table 4.1.

Table 4-1
SPP Spatial Frameworks

<table>
<tr><td colspan="3">Group 1: Areas where wind farms will not be acceptable:
National Parks and National Scenic Areas.</td></tr>
<tr><td colspan="3">Group 2: Areas of significant protection:
Recognising the need for significant protection, in these areas wind farms may be appropriate in some circumstances. Further consideration will be required to demonstrate that any significant effects on the qualities of these areas can be substantially overcome by siting, design or other mitigation.</td></tr>
<tr><td>National and international designations:
World Heritage Sites;
Natura 2000 and Ramsar sites;
Sites of Special Scientific Interest;
National Nature Reserves;
Sites identified in the Inventory of Gardens and Designed Landscapes;
Sites identified in the Inventory of Historic Battlefields.</td><td>Other nationally important mapped environmental interests:
areas of wild land as shown on the 2014 SNH map of wild land areas;
carbon rich soils, deep peat and priority peatland habitat.</td><td>Community separation for consideration of visual impact:
an area not exceeding 2km around cities, towns and
villages identified on the local development plan with an identified settlement envelope or edge. The extent of the area will be determined by the planning authority based on landform and other features which restrict views out from the settlement.</td></tr>
<tr><td colspan="3">Group 3: Areas with potential for wind farm development:
Beyond groups 1 and 2, wind farms are likely to be acceptable, subject to detailed consideration against identified policy criteria.</td></tr>
</table>

Development Plan Policy

4.72 The Site is located within the administrative area of Aberdeenshire Council. The development plan for the Site comprises:

- Aberdeen City and Shire Strategic Development Plan (2014); and
- Aberdeenshire Local Development Plan (2017) and associated Supplementary Guidance.

Aberdeen City and Shire Strategic Development Plan 2014 (ACSSDP)

4.73 The Aberdeen City and Shire Strategic Development Plan (ACSSDP) (Ref. 4.19) was approved by the Scottish Minsters in March 2014. It sets out a clear direction for the future development of the north east which recognises the importance of improving links and connections, adding to the quality of life and providing opportunities for high quality sustainable growth.

4.74 The plan sets out a vision which is designed to lead the way towards development being sustainable, and deals with climate change amongst other things.

4.75 The section of the ACSSDP on sustainable development and climate change advises that the challenges of sustainable development and climate change are some of the most serious we will face over the time period covered by the plan (2014-2032). It notes that the issue of energy supply needs to be tackled and advises that there is some capacity for onshore wind, as well as other technologies. It notes that Local Development Plans will identify areas or technology which can contribute towards the supply of renewable energy.

Aberdeenshire Local Development Plan 2017 (ALDP)

4.76 The Aberdeenshire Local Development Plan (ALDP) (Ref. 4.20) was formally adopted and published in 2017. Preparation of a new Local Development Plan (ALDP 2021) is currently underway, with submissions from the Main Issues Report consultation being assessed. The proposed ALDP 2021 is expected to be published in late 2019 and adoption of the Plan anticipated for 2021. The ALDP is therefore considered to be a relevant and currently up-to-date Local Development Plan. Policy C2 – Renewable Energy is considered to be the key policy within the Aberdeenshire Local Development Plan (ALDP) against which the proposed development should be considered.

Policy C2 – Renewable Energy

4.77 Policy C2 advises:

"We will support solar, wind, biomass (energy from biological material derived from living, or recently living organisms) and hydroelectricity developments which are in appropriate sites and of the right design. We treat biomass schemes as industrial processes suitable for business land.

We will approve wind energy developments in appropriate locations taking into account the spatial framework mapping on page 74. The more detailed guidance set out in the Strategic Landscape Capacity Assessment for wind turbines and the associated mapping on page 74 under the heading Additional Locational Guidance is also a relevant consideration. The areas shown in orange hatching have been assessed as having strategic capacity for turbines over 15 metres when local landscape considerations are taken into account.

All windfarms must be appropriately sited and designed and avoid unacceptable environmental effects taking into account the cumulative effects of existing and consented wind turbines. Turbines must not compromise health and safety or adversely affect aircraft or airfields (including radar and air traffic control systems, flight paths and ministry of defence low flying areas) and/or telecommunications. Unacceptable significant adverse effects on the amenity of dwelling houses or tourism and recreation interests including core paths and other established routes used for public walking, riding or cycling should also be avoided."

4.78 The following policies are also considered to be relevant to the proposed development and have been considered during the design and development of the proposed wind farm:

- Policy E1 - Natural Heritage;
- Policy E2 - Landscape;
- Policy HE1 - Protecting Historic Buildings, Sites and Monuments;
- Policy PR1 - Protecting Important Resources;
- Policy P2 - Open Space and Access in New Development;
- Policy HE2 - Protecting Historic and Cultural Areas; and
- Policy C3 - Carbon Sinks and Stores.

Supplementary Guidance to the ALDP 2017

4.79 The ALDP references nine elements of Supplementary Guidance (SG). These SGs are a material consideration in the determination of planning applications, and they carry the same weight as the policies in the ALDP. The SGs expand upon existing Policies within the adopted Aberdeen LDP.

4.80 The following SGs are considered relevant to the proposed development:

- No.5 - Local Nature Conservation Sites;
- No.8 - Aberdeenshire Forestry and Woodland Strategy; and
- No.9 - Special Landscape Areas.

Planning Advice Documents

4.81 In addition to the SG documents, there are a number of planning advice documents which are relevant to the proposed development. Planning advice provides best practice guidance on how to meet the requirements of the ALDP and its associated SG. A number of Development Briefs and Masterplans were approved under the previous Local Plan as Supplementary Planning Guidance and have been carried forward as Planning Advice under the ALDP.

4.82 Relevant planning advice from Aberdeenshire Council includes:

- 1/2014 Strategic Landscape Capacity for Windfarms;
- 2/2014 Wind Turbines Assessing Noise from Wind Turbine Developments;
- 1/2005 Use of Wind Energy in Aberdeenshire Guidance for Developers; and
- 2/2005 Use of Wind Energy in Aberdeenshire Guidance for Assessing Wind Energy Developments.

4.83 The weight to be attached to all material considerations in the decision-making process is considered in the Planning Statement.

Shared Ownership

4.84 The principle of shared ownership is supported within the planning framework in NPF3 and Scottish Planning Policy. NPF3 advises that:

- *"Shared ownership projects may generate positive social and economic benefits; and*
- *There is potential for renewable energy developments to bring new employment, reverse population decline, stimulate demand for development and services and make a significant contribution to the diversification of energy supplies."*

4.85 Scottish Planning Policy advises that:

- *"Where a proposal is acceptable in land use terms, and consent is being granted, local authorities may wish to engage in negotiations to secure community benefit in line with the Scottish Government Good Practice Principles for Community Benefits from Onshore Renewable Energy Developments; and*
- *Net economic benefits are considered to be a material planning consideration."*

4.86 In addition, the Scottish Government supports the principle of shared ownership as part of renewable energy developments. Good Practice Principles for Shared Benefits from Onshore Renewable Energy Developments advises that:

- *"The Scottish Government would like to see shared ownership projects being considered, explored, and offered as standard on all new renewable energy projects including, repowering and extensions to existing projects".*

4.87 Running as a companion to the Shares Benefits document, Good Practice Principles for Community Benefits from Onshore Renewable Energy Developments further explores the role that community benefits arising from onshore energy projects can bring to communities, in particular around a more holistic approach to community benefits, rather than the traditional "fund" based approach that has been taken to date.

4.88 A Low Carbon Place sets out considerations which are to be taken into account when considering proposals for energy infrastructure development, including wind farms, and these include economic benefits and the scale of the contribution to renewable targets.

4.89 Details in relation to the Applicant's plans for shared ownership are provided in the Net Economic Benefit Report (NEBR) and Pre-Application Consultation Report (PAC) which form part of the application submission. The principles are also outlined in Chapter 16: Socio-economics, Tourism, Recreation and Land Use of this EIA Report.

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Ref. 4.2: European Commission (2014), A 2030 Framework for Climate and Energy Policies.

Ref. 4.3: UK Government (2010), National Renewable Energy Action Plan, Department for Energy and Climate Change.

Ref. 4.4: UK Government (2010, updated 2013), 2050 Pathways Analysis, Department for Business, Energy and Industrial Strategy.

Ref. 4.5: UK Government (2011), The UK Renewable Energy Roadmap, Department for Energy and Climate Change.

Ref. 4.6: UK Government (2013), The UK Renewable Energy Roadmap Update 2013, Department for Energy and Climate Change.

Ref. 4.7: UK Government (2011), UK Carbon Plan, Department for Energy and Climate Change.

Ref. 4.8: UK Government (2018), Reducing Emissions and Preparing for Climate Change 2018 Progress Report to Parliament, Committee on Climate Change.

Ref. 4.9: Scottish Government (2015), 2020 Routemap for Renewable Energy in Scotland Update 2015.

Ref. 4.10: Scottish Government (2013), Electricity Policy Statement.

Ref. 4.11: Committee on Climate Change (2018), Reducing Emissions in Scotland 2018, https://www.theccc.org.uk/publication/reducing-emissions-in-scotland-2018-progress-report-to-parliament/ [accessed 22/11/2019].

Ref. 4.12: Scottish Government (2018), Climate Change Plan: third report on proposals and policies 2018-2032 (RPP3).

Ref. 4.13: Scottish Government (2017), Scottish Energy Strategy: The Future of Energy in Scotland

Ref 4.14: Scottish Government (2017), Renewable and Low Carbon Energy: Onshore Wind Policy Statement.

Ref. 4.15 Committee on Climate Change (2019), Net Zero: The UK's Contribution to stopping global warming.

Ref 4.16 Scottish Government (2019) Energy Statistics for Scotland Q4, https://www2.gov.scot/Topics/Statistics/Browse/Business/Energy/Database [accessed 22/11/2019]

Ref. 4.17 Scottish Government (2014), National Planning Framework 3 https://www.gov.scot/publications/national-planning-framework-3/ [accessed 22/11/2019]

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Ref. 4.20 Aberdeenshire Council (2014), Aberdeenshire Local Development Plan. https://www.aberdeenshire.gov.uk/planning/plans-and-policies/aberdeenshire-local-development-plan-2017/ [accessed 22/11/2019]