CLASHINDARROCH WIND FARM

Planning Statement

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CONTENTS

EXECUTIVE SUMMARY 1

1.0 INTRODUCTION 3

1.1 Purpose of this Planning Statement 3

1.2 The Decision-making Framework 4

1.3 The Applicant 4

2.0 THE SITE, ITS SURROUNDINGS AND THE PROPOSED DEVELOPMENT 5

2.1 The Site and its Surroundings 5

2.2 The Context for the Scale of Proposed Development 6

2.3 Description of the Proposed Development 7

2.3.1 The Proposed Turbines 7

2.3.2 Forestry 8

2.3.3 Access to the Site 9

2.3.4 Grid Connection 9

2.3.5 Construction Programme 9

2.3.6 Access Tracks 9

2.3.7 Operational Phase 10

2.3.8 Community Benefit 10

2.3.9 Shared Ownership 10

3.0 PLANNING HISTORY 13

4.0 RENEWABLE ENERGY AND PLANNING POLICY ASSESSMENT 14

4.1 Climate Change and Renewable Energy Policy 14

4.1.1 Current Scottish Government Energy Policy 15

4.2 Progress to the Scottish Renewable Energy & Electricity Targets 18

4.2.1 Renewable Energy Targets 18

4.2.2 Clashindarroch II Wind Farm Contribution to Targets and National Policy Objectives 20

4.3 National Planning Policy 21

4.3.1 National Planning Framework for Scotland (NPF3) 21
4.3.2 Scottish Planning Policy 2014 (SPP) 22
4.4 The Development Plan 45
4.5 Aberdeen City and Shire Strategic Development Plan 45
4.6 Aberdeenshire Local Development Plan 46
4.6.1 Vision and Spatial Strategy 47
4.6.2 ALDP Policies 48
4.6.3 Proposed Local Development Plan 2021 49
4.6.4 Supplementary Guidance 49
4.6.5 Planning Advice 49
4.7 Development Plan Conclusion 53
4.8 The Scottish Government Online Renewables Advice – Onshore Wind Turbines 53
4.9 Historic Environment Scotland Policy Statement 2019 (HESPS) 54
4.10 SNH - Spatial Planning for Onshore Wind Turbines – natural heritage considerations 2015 . 54
4.11 The Balance of Issues 54
5.0 CONCLUSIONS 56
5.1 Benefits of the Proposed Development 56
5.1.1 Energy Policy and Relevant Targets 56
5.1.2 Economic Impacts 57
5.1.3 Community Shared Ownership Impacts 57
5.1.4 Community Benefit Impact 57
5.1.5 Other Benefits 57
5.2 Residual Environmental Effects 58

DOCUMENT REFERENCES

TABLES

Table 4-1 Scottish Renewable Energy Targets 18
Table 4-2 Table 1 of SPP Spatial Frameworks 26

Table 4-3 Statutory Ecology Designated Sites Within 10 km 38
Table 5-1 Summary of Environmental Effects 59

FIGURES

Figure 1: Site Context
Figure 2: Proposed Site Infrastructure

APPENDICES

Appendix 1: Schedule 9 of The Electricity Act 1989
Appendix 2: Renewable Energy Policy
Appendix 3: Local Development Plan Policies
Appendix 4: Shared Ownership and Economic Benefit
Appendix 5: Community Partnership Strategy

Executive Summary

1. The UK and Scottish governments have set ambitious climate change targets. The Scottish government declared a climate emergency in May 2019 and has recently approved the Climate Change Bill which has passed into law the requirement for a 100% reduction in carbon dioxide (CO2) emissions by 2045. Vattenfall Wind Power Ltd (the Applicant) is helping to address the challenges of climate change by developing renewable energy projects, such as the proposed Clashindarroch II Wind Farm.

2. The proposed development is located in Aberdeenshire and approximately 6km to the south west of the settlement of Huntly. It would comprise 14 wind turbines which would generate between 56 and 84 MW, and associated site infrastructure such as substation and access tracks. It would produce between 184-163 gigawatt hours (GWh) of electricity annually, based on a capacity factor of 37.5%. It is anticipated that the proposed development would have a carbon payback period of approximately 1.2-1.4 years (assuming a 5.5 MW turbine), when compared to the fossil fuel mix of electricity generation

3. The Applicant is applying for the proposed development under Section 36 of the Electricity Act 1989. The Applicant has undertaken an Environmental Impact Assessment (EIA) and produced its findings in this EIA Report. The EIA Report informs readers of the nature of the proposed development, likely significant environmental effects and measures proposed to protect the environment, during site preparation, construction, and the operation of the proposed development.

4. By using the latest turbine technology, each turbine at the proposed development would produce between approximately 4 and 6 MW. This would help to deliver new renewable energy capacity which is needed to help the UK and Scottish Government meet their climate goals, address the climate change emergency and provide low-carbon power.

5. The Scottish Government's current policy shows clear support for taller turbines in the Onshore Wind Policy Statement and the Scottish energy Strategy. Paragraph 23 of the Onshore Wind Policy Statement states that the Scottish Government "*acknowledge that onshore wind technology and equipment manufacturers in the market are moving towards larger and more powerful (i.e. higher capacity) turbines and that these by necessity will mean taller towers and blade tip heights*". Paragraph 25 of the OWPS continues that the Scottish Government "*fully supports the delivery of large wind turbines in landscapes judged to be capable of accommodating them with significant adverse impacts*."

6. The energy capture estimated for the proposed development is the result of the overall positive impact of accommodating larger rated capacity and the larger rotor (swept area) available at higher hub heights whilst respecting environmental impacts. The resultant efficiency, economics and commerciality of the scheme would enable the Applicant to reduce the cost of energy from the proposed development, giving a positive benefit to consumers in terms of electricity cost. In recent years, the onshore wind industry has experienced the reduction in supply of smaller turbines across Europe due to lack of demand from mainland Europe, where the tendency is to install turbines at higher tip heights (e.g. 175 – 240 m to blade tip). Therefore, it is highly unlikely that a range of smaller turbines (e.g. 120 m) would be available at competitive prices by the time the proposed development is ready to be constructed, if consented. Larger turbines need to be considered and accepted if onshore wind is to continue to make a contribution to both the UK and Scottish Government's renewable energy targets.

7. During construction a total direct spend of approximately £52.64 million is anticipated, of this £12 million would be spent in Scotland. The Scottish economy would benefit by some £14.4 million net Gross Value Added (GVA) during construction.

8. During the 18 months' construction phase, the proposed development is expected to support 84 jobs on site at the peak of construction activity. Around 257 Full Time Equivalent (FTE) employment years would be created during the wider construction period. During the operational phase, if consented, the proposed development is expected to create between 202 FTE employment years in Aberdeenshire and Moray.

9. The proposed development includes the offer of community shared ownership which has the potential to create important net economic benefits. Clashindarroch Wind Farm was completed in early 2015 and has a capacity of 36.9MW, generating 114,469MWh every year. The Clashindarroch Community Fund provides £185,000 annually for projects in Huntly, Strathbogie and Tap O'Noth and the area of the Cabrach Community Association.

10. For the proposed development, the Applicant is committed to offering a package of community benefits to local communities that could include the opportunity for community benefit and to invest in the operational development, should it be consented. The Applicant would continue to engage with local stakeholders to identify which communities would be appropriate to participate in these benefits. The Applicant would keep local communities informed about these benefits as the project progresses and, in line with Scottish Government guidance, will provide information in a timely manner so the communities are able to fully assess the opportunity.

11. The potential for effects on a wide variety of environmental factors have been considered through the EIA. Where identified, the significant environmental effects of the proposed development have been mitigated, as far as reasonably possible, through an extensive process of design iteration. The proposed development makes efficient use of the existing network of forest roads and access tracks that are already located onsite for existing forest and wind farm operations. The proposed development includes mitigation and enhancements relating to forestry, access and construction. These would ensure that the proposed development is delivered in an appropriate manner which would benefit the environment in a wide variety of ways.

12. The proposed development is located in an area which is considered to be suitable for wind farm development in the context of Scottish Planning Policy. It is acknowledged that the proposed development would result in a number of localised significant landscape and visual effects. These are the only significant effects that are predicted subject to the implementation of appropriate mitigation. This is expected from any renewable energy development, including wind turbines of this kind and an inevitable consequence of the development form. However, given the careful design process, the landscape and visual impacts of the proposed development are considered to be acceptable. There would be no overwhelming or overbearing residential visual effects from the proposed development.

13. The proposed development is for a commercial scale wind farm which would deliver clean energy to the national grid at a low cost. If the issue of the climate emergency is to be addressed then developments such as the proposed development must come forward and, subject to environmental considerations, be consented to meet the need for clean energy at a reasonable cost. The proposed development is considered to be an important and strategic opportunity to contribute to the Scottish Governments ambitious targets for renewable energy. It would make a valuable contribution to the fight against climate change. The potential of the Site has been maximised whilst respecting the environmental constraints and sensitivities of the Site and the surrounding area. The proposed development for which consent is sought is considered to be in accordance with the develo0pment plan and to be acceptable.

1.0 Introduction

14. The UK and Scotland's current climate change ambitions are amongst the highest in Europe. The Scottish government declared a climate emergency in May 2019 and has recently passed the Climate Change Bill which has passed into law the requirement for a 100% reduction in CO2 emissions by 2045. This is supported by the Scottish Energy Strategy's (Scottish Government 2017) target of 50% of all energy (including transport, heat and electricity) being supplied from renewables by 2030.

15. Vattenfall Wind Power Ltd (the Applicant) propose to install and operate 14 wind turbines and associated infrastructure on land (the Site) adjacent to the existing Clashindarroch Wind Farm, in Aberdeenshire, on land owned by Forestry and Land Scotland (FLS). This would be known as the Clashindarroch II Wind Farm (the proposed development) and would be located approximately 6km to the south-west of the town of Huntly.

16. This Planning Statement does not form part of the Environmental Impact Assessment Report (EIA Report) but is submitted in support of the application for deemed planning permission to the Scottish Ministers. The Planning Statement refers to the EIA Report and the EIA Report should be reviewed in the context of this Planning Statement.

1.1 Purpose of this Planning Statement

17. The application for the proposed development is submitted to the Scottish Ministers under section 36 (S36) of the Electricity Act 1989 (the 1989 Act). The Applicant, by way of the S36 process, requests that the Scottish Ministers issue a S36 Consent in respect of the proposed development, together with a Direction under section 57(2) of the Town and Country Planning (Scotland) Act 1997 as amended (the 1997 Act) that deemed planning permission is granted for the proposed development.

18. The application is for a new wind farm development and is not an extension to the existing Clashindarroch Wind Farm. It is being brought forward by a different applicant and is the subject of different land ownership agreements and grid connection.

19. In the consideration of the application the Scottish Ministers' have a duty to fulfil the requirements of Schedule 9 (paragraph 3) of the 1989 Act. Schedule 9 considers the preservation of amenity and sets out a number of environmental matters which must be considered.

20. The Planning Statement seeks to address all of the relevant environmental topics in Schedule 9, the Development Plan and Scottish Government planning and energy policy. This Planning Statement sets out the planning case of the proposed development as follows:

- Section 1.0 includes the introduction to the Planning Statement, provides the framework for decision making and provides background information on the Applicant;

- Section 2.0 provides a brief description of the Site and the location of the proposed development and a description of the proposed development itself including key features of mitigation which are embedded in design;

- Section 3.0 sets out the planning history of the site;

- Section 4.0 sets out the planning assessment for the proposed development. It summarises the matters which are considered to be relevant to the decision making process – the key considerations for

determination of the application; and

- Section 5.0 contains a conclusion in respect of the planning case for the proposed development.

1.2 The Decision-making Framework

21. The application for the proposed development requires to be considered under the terms of the 1989 Act, in particular Schedule 9 because it would exceed 50 megawatts (MW) in generating capacity. Key to this is the need to have regard to 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; and the reasonable mitigation of any effect which the proposed development would have on the natural beauty of the countryside or on any such flora, fauna, features, sites, buildings or objects. There is also a requirement to avoid, in so far as possible, causing injury to fisheries or to the stock of fish in any waters. The full wording of Schedule 9 is set out in Appendix 2 of this Planning Statement.

22. The Applicant, through the EIA process 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 the EIA Report.

1.3 The Applicant

23. Vattenfall is a leading European energy company with approximately 20,000 employees. For more than 100 years we have powered industries, supplied energy to people's homes and modernised the way our customers live through innovation and cooperation.

24. We now want to make fossil free living possible within one generation. Therefore, we are driving the transition to a more sustainable energy system through growth in renewable production and climate smart energy solutions for our customers.

25. We have been delivering wind energy projects in the UK since 2008. Today we operate more than 1 gigawatt (GW) of renewable energy and have invested £3.5bn. Our broader thinking means we are drawing on our capability across northern Europe to build significant and integrated UK operations in wind energy, district heating and cooling, independent power distribution, electric vehicle charging services and infrastructure, B2B sales and retail.

26. Further information on the Applicant can be found on its corporate website at https://group.vattenfall.com.

2.0 The Site, its Surroundings and the Proposed Development

27. This section of the Planning Statement summaries the characteristics of the site and its surroundings. It sets out the key elements of the proposed development. Information is provided in the EIA Report, at Chapter 2, and in the Design and Access Statement on the reasons for the site selection and the key design considerations that were taken into account in arriving at the final layout and design. They are not repeated here.

2.1 The Site and its Surroundings

28. The proposed development is located within Clashindarroch Forest, approximately 6km to the south west of the settlement of Huntly, Aberdeenshire and is centred on grid reference NGR 344500, 836500. The site is within the administrative boundary of Aberdeenshire Council and is managed by Forestry Land Services (FLS) on behalf of Scottish Ministers. The area of the Site extends to approximately 1235 hectares (ha), with the proposed wind turbines located in the southern part of the Site. Access to the Site is provided from the A920 and would utilise as far as possible the existing onsite access tracks.

29. The Site lies within an upland landscape which is characterised by a series of rounded hills and interlocking spurs separated by incised river valleys. Topography ranges from approximately 220m Above Ordnance Datum (AOD) to 525m AOD. The western side of the Site forms the most elevated part and is defined by a series of rounded hills which form a distinctive ridgeline comprising forestry to the east, and moorland/farmland to the west. Notable hills along this ridgeline include Red Hill (522m AOD), Grumack Hill (517m AOD), Black Hill (505m AOD), Mount of Haddoch (521m AOD), and Lelds Hill (482m AOD). To the east of this ridgeline, the Site is characterised by a series of rounded hills with interlocking spurs and incised valleys descending towards the River Bogie.

30. There are no statutory ecological designations, no landscape designations and no scheduled archaeological or cultural heritage designations within the Site.

31. The surrounding area is generally rural in nature with large areas of commercial forestry to the east of the Site. The River Deveron is also located to the east of the Site.

32. Nearby statutory ecological and ornithological designations include:

- Craigs of Succoth Site of Special Scientific Interest (approx. 2.5 km for the nearest turbine);
- Moss of Kirkhill SSSI (approx. 9.3km for the nearest turbine);
- Hill of Towanreef SSSI and SAC (approx. 4.2 km for the nearest turbine); and
- The Tips of Cosesmaul and Tom Mor SSSI and SPA (approx. 6 km for the nearest turbine).

33. Nearby landscape designations include:

- Deveron Valley Special Landscape Area (SLA) (4.3km north);
- Upper Don Valley SLA (approx.12.3km south);
- Bennachie SLA (approx.12.6km south east); and
- Moray Area of Great Landscape Value (AGLV) (0.5km west).

34. The Cairngorms National Park (CNP) (including Wild Land and National Scenic Area designations) is

located to the south west of the Site.

35. A number of other wind farm developments and proposed wind farm developments are located within proximity to the Site. Within 10 km operational developments include:

- Clashindarroch I Wind Farm, approximately 0.5 km[1] to the south south west;
- Cairnmore Wind Farm & extension , approximately 9.6 km to the south east;
- Upper Wheedlemont Wind Farm, approximately 7km to the south east of the Site;
- Dorenell Wind Farm, approximately 9.3 km to the north south west of the Site;
- Midtown of Glass Wind Turbine, approximately 9.3 km to the north north west of the Site;
- Cairnborrow Wind Farm, approximately 8.9 km to the north of the Site; and
- Baillieswards Farm Wind Turbine, approximately 4.9 km to the north north east of the Site.

36. The location of these sites is shown in the EIA Report at Figure 7.7a. Further information on the Site and its surrounding can be found in the EIA Report in Chapter 2 Site Description.

37. There are a number of residential properties scattered around the Site.. Larger settlements nearby include Gartly to the east and Rhynie to the south east.

2.2 The Context for the Scale of Proposed Development

38. The proposed development is being presented against a background of continuing need for further onshore wind energy to meet Scottish Government 2020 targets which are set out in Section 7 of this Planning Statement, reaffirmed by the letter from the Chief Planner to all Heads of Planning in November 20152. This has been further supported in the Scottish Government's recent Energy Strategy and Onshore Wind Policy statement, both of which are also supportive of further onshore wind. Onshore wind is considered to be the cheapest form of renewable energy and the proposed development is being brought forward in the context of reduced financial support for onshore wind. The proposed development seeks to maximise the output from the proposed turbines whilst seeking to respect environmental constraints and therefore it is proposed to install turbines of up to 180.0m tip height. This both maximises the clean energy contribution from the Site and ensures that the contribution is provided at least cost to the electricity consumer.

39. The Site experiences particularly high wind speeds and in proposing turbines with tip heights of up to 180.0m to accommodate larger rotor sizes, the Applicant would be able to fully utilise these high wind speeds effectively and maximise the energy yield of the Site. It is important to focus on the energy yield of the proposed development rather than the installed capacity in order to understand the difference that larger turbines at a site can make to the ability of a development to deliver energy at an acceptable price to the market.

40. The higher energy capture estimated for the proposed development is the result of the overall positive impact of accommodating much larger rated capacity machines (4MW+) and also the larger rotor diameter (swept area) available at a higher hub height. The resultant improvement in the economics and commerciality of the scheme would enable the Applicant to reduce the cost of energy from the

[1] All distances are measured from the Site centre (NGR 344000, 833000) to the nearest turbine of the other wind developments.
[2] Energy Targets and Scottish Planning Policy: Chief Planner's Letter 11th November 2015.

development, giving a positive benefit to consumers in terms of electricity cost and reducing the reliance on any future support mechanism such as Contracts for Difference (CfD).

41. In recent years, the onshore wind industry has experienced the reduction in supply of smaller turbines across Europe due to lack of demand from mainland Europe, where the tendency is to install turbines at higher tip heights. Larger turbines need to be considered if onshore wind development is to continue to contribute to both the UK and Scottish Government's renewable energy targets. This is clear in the Scottish Government Onshore Wind Policy Statement 2017 which states that the Scottish Government:

> *"acknowledge that onshore wind technology and equipment manufacturers in the market are moving towards larger and more powerful (i.e. higher capacity) turbines*[3] *and that these – by necessity – will mean taller towers and blade tip heights."*

2.3 Description of the Proposed Development

42. The layout for the proposed development is described in detail in Chapter 3 of the EIA Report and is shown on Figure 2. Additional details on construction methods are provided in the outline Construction and Environmental Management Plan (CEMP) included in EIA Report Technical Appendix 3.2. The key component parts of the proposed development include the following:

- 14 wind turbines with a maximum tip height of 180 m and associated aviation lighting, transformers and foundations;
- approximately 6.2km of new access tracks, associated drainage and improvement of site entrance;
- upgrading of up to 15.4km of the existing on-site access tracks;
- 3 borrow pit search areas
- underground cabling along access tracks to connect the turbine locations, and control building;
- control building and associated compound;
- a temporary construction compound during the construction period; and
- one permanent met mast 112m in height.

43. The following text provides some more detail on the proposed development. Further detailed information can be found in the EIA Report at Chapter 3.

2.3.1 The Proposed Turbines

44. A range of wind turbine models may be suitable for the Site, and the final choice of turbine model to be selected for the proposed wind farm would be dependent on the wind analysis, turbine economics and available technology at the time of procurement. It is expected that each wind turbine would have an installed capacity of between 4 and 6 MW (or greater, subject to future advances in turbine technology) giving a total installed capacity of between 56.MW and 84 MW. The proposed development would produce an average of between 184 gigawatt hours (GWh) and 263 GWh of electricity annually (based on an average capacity factor of 37.5%). This equates to the annual power consumed by between

[3] Recent reports – such as the Energy & Climate Intelligence Unit's "Blown Away" – point out that average turbine sizes in other European countries are growing, quoting an average EU nameplate capacity of 2.2 MW, and 3.3 MW for turbines in Sweden

approximately 48,500 to 69,500 average UK households[4] (depending on the actual turbines installed).

45. The proposed turbine locations are shown on Figure 2 and the co-ordinates for each are provided in Table 3-3 of the EIA Report. A 50 m micro siting tolerance has been presumed in the EIA process. If deemed planning permission is forthcoming it is anticipated that there would be a condition limiting micro siting, without consultation to 50 m.

46. The exact model of wind turbine to be installed at the proposed development would be selected through a competitive procurement process. In each assessment in the EIA a worst-case scenario of the turbine dimensions/characteristics has been used. An indicative turbine for the wind farm is shown on Figure 3.3 of the EIA Report. An 112m anemometer mast would be installed on Site. The mast would be lattice in structure. The purpose of this is to provide operations and performance monitoring data.

47. The proposed turbines are over 150m to blade tip and in line with current guidance from the CAA, are required to be lit with medium intensity (2000 candela) steady red aviation warning lights in accordance with Article 222 of the UK Air Navigation Order (ANO) 2016. A second light serving as an alternative should be provided in case of failure of the operating light. Additionally, at least three (to provide 360-degree coverage) low-intensity (32 candela) lights should be fitted at an intermediate level of half the nacelle height.

48. The CAA Policy Statement on Lighting of Onshore Wind Turbine Generators in the United Kingdom with a maximum blade tip height at or in excess of 150m Above Ground Level (June 2017). This allows lights to operate in a lower intensity mode "if the horizontal meteorological visibility in all directions from every wind turbine generator in a group is more than 5km". In these circumstances the 2000 candela lights could be operated at "not less than 10% of the minimum peak intensity specified for a light of this type" (200 candela). It is therefore proposed that visibility sensors be installed on turbines. Should atmospheric conditions (for example low cloud cover, rain, mist, haze or fog) mean that visibility around the Site is greater than 5km, lights would operate in a lower intensity mode of 200 candela. If visibility is restricted to 5km or less, lights would operate at 2000 candela.

49. There are a number of emerging technologies which have the potential to mitigate the effects of aviation lighting. These include the potential for radar activated lighting and directional The speed at which these technologies are being developed is fast moving and the Applicant is committed to reducing the effects of the aviation lighting and would consider the potential for further mitigation of aviation lighting at the relevant time.

2.3.2 Forestry

50. The Site is part of a large commercial forestry block. Details of the proposed forestry works are included in the EIA Report Technical Appendix 3.2. The composition of the forest would change as a result of the proposed development forestry proposals. In particular, felling would be advanced on 125.3 ha, the area of productive conifer woodland would decrease by 79.9 ha and the area of broadleaf woodland would decrease by 2 ha. Overall, there would be a net loss of woodland area of 88.5 ha.

51. In order to comply with the Scottish Government's Control of Woodland Removal Policy, compensation planting would be required to mitigate for the loss of woodland area. The Applicant is committed to providing appropriate compensatory planting. It is assumed that compensatory planting would be the

[4] Calculated using the most recent statistics from the Department of Business, Energy and Industrial Strategy (BEIS) showing that annual UK average domestic household consumption is 3,781kWh (RenewableUK, 2018).

subject of a suspensive condition should consented be granted. This would require agreement on the extent, location and composition of such planting and would be agreed with Scottish Forestry taking into account any revision to the felling and restocking plans prior to the commencement of operation of the proposed development.

52. It is understood that the advance felling within the site would be offsite by a reduction in felling elsewhere in the forestry block as part of the commercial management of the Clashindarroch Forest as a whole.

2.3.3 Access to the Site

53. The wind turbine components would be delivered to the Site using the existing public road network. The approach to the Site for wind turbine components would be taken via the A96 and then via the A920. The Site entrance would be gated from the public highway and, during construction, access to the Site would be controlled by a security guard based in an onsite cabin next to the Site entrance. The location of the Site entrance is shown in Figure 2.

54. Abnormal loads would be required to transport turbine components to the Site. The access route for these abnormal loads would be via two main feasible routes:

- Port of Inverness, then travelling on the A9, A96 and the A920 to the Site access junction; and
- Port of Aberdeen, then travelling on the A96, A9001, A920, A96 and the A920 to the Site access junction.

2.3.4 Grid Connection

55. The proposed development would connect to the Transmission Grid network near Craighead/Wellheads, at a similar location as the existing Scottish and Southern Electricity (SSE) substation associated with the Clashindarroch Wind Farm. The existing substation is located at NGR 349100, 840600; close to the A920 and surrounded by the boundary of the Site but is not included within it.

56. A new substation would be built within the Site boundary at NGR 345459, 835954., near to the existing Clashindarroch Wind Farm substation building, to connect the proposed development to the network (EIA Report Figure 3.1). The grid connection cable would be wholly underground and within the Site boundary, therefore it is included within this EIA and EIA Report and forms part of the application for s.36 consent and deemed planning permission.

2.3.5 Construction Programme

57. The proposed development would be constructed over a period of approx.18 months followed by a short period of reinstatement. The number of people employed during the construction period would vary depending on the stage of construction and the activities ongoing onsite, peaking at 84 staff. The EIA Report advises that, out of necessity, some activity, for example abnormal load deliveries, concrete deliveries during foundation pours and the lifting of the turbine components, may occur outside the specified hours stated (0700 to 1900 Monday to Friday and 0700 to 1300 on Saturday) although would not be undertaken without prior approval from Aberdeenshire Council.

2.3.6 Access Tracks

58. Approx. 33.8km of track including approx. 10.9km of new access tracks with a typical 5m running width and associated drainage; upgrading of up to 1.9km of the existing on-site access tracks; and approx. 21km of track which would not be upgraded except in a limited number of locations where vertical and horizontal realignment is required. The proposed track has been carefully considered to ensure that

the larger turbines can be transported through the Site. In some cases, 2 options are shown for tracks to turbines. This is to allow flexibility in construction. The technical chapters have considered both options to ensure a worst-case scenario. A choice on the final track options will be made prior to construction.

59. Tracks would be unpaved and constructed of a graded local stone with a minimum running width of 5 m (wider on bends and at junctions). It is anticipated that material for the construction of onsite tracks would be derived from the proposed onsite borrow pit, should the materials be found to be suitable.

60. Assessments have indicated that all aggregate for tracks, hard standings, substation compound, turbine foundations and temporary construction compound can be won from the Site. Some Class 1 aggregate may need to be imported for track surfaces and the like.

2.3.7 Operational Phase

61. The proposed development would have an operational life of up to 30 years from first commissioning, it is anticipated that the proposed development would become operational in 2023. The proposed development would largely be controlled and managed remotely, however there would be technicians on the Site regularly. A service team would be set up to maintain the proposed wind farm throughout its operational life. An operations manager would oversee day-to-day wind farm operations managing a small team who may be based in the local area. Turbine maintenance would be carried out, along with any other maintenance required by manufacturers' specifications and would likely include the following:

- initial servicing;
- annual civil maintenance of tracks and drainage;
- scheduled routine maintenance and servicing;
- unplanned maintenance or call outs; and
- blade inspections.

62. At the end of its operational life the proposed development would be decommissioned, and the site reinstated in accordance with a Decommissioning, Restoration and Aftercare Plan. Alternatively, an application may be submitted to repower the Site.

2.3.8 Community Benefit

63. The proposed development would provide community benefit funding from its operation which would be additional to that from the established Clashindarroch Community Fund. The proposed level of community benefit is £5,000 per MW per annum, index linked for the operational life of the proposed wind farm.

64. The Community Partnership Strategy calculates the net economic benefit that is expected to arise for energy generation scenarios of between 50 and 80MW. With regard to a community benefit rate of £5,000 per MW, this would result in an annual community value of between £250,000 to £400,000. This would be a higher level of income that that currently gained from Clashindarroch Wind Farm.

2.3.9 Shared Ownership

65. A Community Partnership Strategy has been development by the Applicant. It is submitted as Appendix 5 of this Planning Statement. Following communication of the shared ownership opportunity, Marr Area

Partnership (MAP) and Huntly & District Development Trust (HDDT) ('Community Bodies') have had initial discussions with Vattenfall about fulfilling the role of "Partner Organisation" in relation to the Shared Ownership offer.

66. The largest settlement in HDDT is Huntly, and includes the settlements of Aberchirder, Cabrach, Gartly, Insch, Lumsden, Rhynie and Torry. MAP overlaps with the area covered by HDDT and stretches from Huntly in the north, to Banchory in the south East and across to Braemar to the west. Settlements in this area include Huntly, Aboyne, Banchory, Braemar, Donside, Howe of Alford, Lumphanan, Mid-Deeside, Upper Deeside, Strathbogie, Tarland and Torphins.

67. While MAP and HDDT both cover an extensive area, the area of benefit for the proposed development would be similar to the area of benefit that was adopted for Clashindarroch Wind Farm, i.e. the Strathbogie, Huntly and Tap O'Noth Community Councils and the area covered by The Cabrach Trust. However it will also incorporate a small proportion of the North Marr area within the Donside Community Council area.

68. The Community Partnership Strategy assumes that between 0.5%-1% of annual revenue would be offered to the community. This would be in addition to the proposed community benefit payment and would provide a strategic opportunity to achieve local socio-economic objectives.

69. This level of funding could result in a measurable difference to the local economy around the Site. The existence of such a fund would allow projects and activities that otherwise may not be able to attract sufficient funding to go ahead. Such activities, being locally instigated and relatively small in scale, tend to utilise local labour and services, and consequently the direct and indirect economic effects disproportionately benefit the local area.

70. The Community Partnership Strategy estimates that the proposed level of income for local communities arising from the proposed development could translate into the creation of 38-55 employment opportunities in the local area. Other benefits are likely to arise that would address strategic policy priorities for the area such as support for local housing, broadband connection, and measures to address social isolation.

71. The information provided in the Community Partnership Strategy indicates that, subject to the decisions taken by the local community with regard to use of income from the wind farm, there is potential for beneficial effects on employment. At the level of the WSA the effects would be negligible, but as suggested in the Community Partnership Strategy there would be a more concentrated impact within the communities immediately surrounding the proposed development. Additional beneficial effects in the local area would include non-quantifiable effects on socio-economic policy priorities.

72. The Community Partnership Strategy advises that the information allows an estimate of the scale of net economic benefit which could be achieved by Community Benefit/Shared Ownership investment. Over the 25-year lifetime of the proposed development, the scale and nature of impacts across the Clashindarroch II could extend to:

- Support 38-55 employment opportunities;
- Delivery of 740-1,080m^2 floorspace:
    - c. 290-430m^2 managed office space;
    - c. 205-300m^2 general-purpose community hall to host community functions and events;

  - c. 240-350m^2 tourism space to celebrate local heritage and culture;

- Purchase of c. 10-14 acres which could accommodate some 100 houses;
- Connecting c. 190-280 households or businesses to broadband;
- Building 870-1,260m of new rural road;
- Rehabilitation of 60-196m^2 residential properties;
- Delivery of c. 7,300-10,700m^2 of public realm improvements (i.e. new planting & paving);
- Purchase of 2-3 minibuses to provide additional mobility options; and
- Support 1-1.6 Social Worker/Carer per annum to address issues of social isolation.

3.0 Planning History

73. Whilst it is acknowledged that any application seeking planning permission or as in this case deemed planning permission should be considered on its own merits, it is important to acknowledge the planning history for the Site.

74. An application for a wind farm at Clashindarroch Forest and was submitted to the Energy and Telecommunications Division of the Enterprise, Transport & Lifelong Learning Department of the Scottish Executive in July 2005 by AMEC Project Investments Limited. The proposal was for 47 wind turbines and associated infrastructure, turbines with a blade tip height of 100m and an overall maximum installed site capacity of 129.25 megawatts. In June 2006 a Reporter recommended to the then Scottish Minister that neither Section 57(2) deemed planning permission, nor Section 36 Consent be granted. The proposed development has had regard to the matters raised in this application in the evolution of the proposed development. The weight to be attached to the previous decision is limited given the age of the decision and the different scale of development proposed.

75. A planning application for a wind farm at Clashindarroch was approved by Aberdeenshire Council in August 2012. The applicant was Clashindarroch Wind Farm Limited. This application (reference APP/2009/1380) was submitted to Aberdeenshire Council in May 2009 and was for 18 wind turbines with a blade tip height of 110m and associated infrastructure. The Clashindarroch Wind Farm has been operational since early 2015. The proposed development is to the north of the existing operational Clashindarroch Wind Farm.

76. The design and layout of the current proposal has been informed by the sites planning history, especially the reasons for refusal provided by the Reporter on the 2005 application. Steps have been taken to mitigate the negative landscape and visual effects sited through a reduced number of wind turbines and a more sensitive approach to sighting and positioning. Negative construction effects will be mitigated through sharing existing infrastructure, where possible, with the existing Clashindarroch Wind Farm.

4.0 Renewable Energy and Planning Policy Assessment

77. As set out in introductory Chapters, given the proposed development would exceed 50 MW in generating capacity it must be considered under S36 of the Electricity Act 1989. The Act contains a number of requirements which decision makers can use as a guide as part of the process to determine whether to grant consent for the proposed development or not. In summary the requirement is to consider what effects the proposed development would have on a range of environmental matters and to what extent the Applicant has sought to mitigate any such effects. It is not a test that has to be passed or can be failed. The wording is clear that the Applicant shall have regard to the desirability of preserving a number of features and reasonably do what they can to mitigate effects on the features. The decision maker is required to have regard to the desirability of the features and the extent to which the Applicant has sought to mitigate effects.

78. The proposed development has thoroughly assessed the matters which are raised in Schedule 9 and has, where appropriate, identified significant effects and reasonable mitigation of those effects. The EIA has considered matters which are not covered by Schedule 9 as well as those which are covered. It is submitted that the requirement to have regard to the preservation of matters stated in Schedule 9 has been met and that the requirement to reasonably mitigate effects has also been met through the EIA process.

79. The S36 approach to determination is set in the context of legislation which seeks to support electricity developments which might be considered to be nationally important (i.e. in excess of 50 MW). In the decision making process it is therefore material to consider the extent to which the proposed development may contribute to national policy both in terms of energy and planning. To help understand how the proposed development contributes to national planning objectives and to help inform the decision maker the extent to which the Applicant has complied with Schedule 9, it is relevant to consider the extent to which the proposed development accords with the Development Plan.

80. It must be remembered that in materially considering the Development Plan the test to be applied is not the same as in the case of the Town and Country Planning (Scotland) Act 1997 as amended (the 1997 Act). The test, as set out in Section 25 of the 1997 Act, against the Development Plan is not triggered in the case of a S36 applications (See Appendix 1 for some case law examples). In effect a development being considered under Section 36 of the Electricity Act need not accord with the Development Plan to be considered acceptable and for consented to be granted.

81. This Chapter of the Planning Statement sets out and provides the renewable energy policy which sets the context for the framework in which the proposed development is being brought forward. It then considers the way in which the proposed development could assist in meeting the relevant Government targets for renewable energy. It then goes on to consider the relevant Scottish planning policy contained in the National Planning Framework 3 (NPF) and Scottish Planning Policy (SPP). This Chapter then considers the relevant Development Plan policy. Finally, this Chapter considers the balance of the issues which have been considered.

4.1 Climate Change and Renewable Energy Policy

82. The context for decision making on renewable energy developments and the rationale for development of the nature proposed lie in international efforts to combat the expected adverse effects of climate change. Appendix 3 sets out details of this international context. The international policy context has been adopted by successive Government in both the UK and Scotland. The Electricity Sector has been a focus for change in climate change policy and Governments have set increasingly ambitious targets for

electricity generation by means which does not produce carbon dioxide (a recognised Greenhouse Gas). In Scotland whilst the electricity sector is largely decarbonised, it is recognised going into the future that additional electricity generation capacity is required as ambitious targets to decarbonise the heat and transport sectors are set.

83. Appendix 2 of this planning Statement sets out the International, UK and Scottish policy framework for the proposed development. The key polices for the consideration of the application for the proposed development are considered to be The Climate Change Plan, the Scottish Energy Strategy (2017), The Scottish Onshore Wind Policy Statement (2017) and The Electricity Generation Policy Statement together with the latest climate change targets. The following text sets out the current Scottish Government Energy Policy, the current Scottish targets and the progress towards those targets.

4.1.1 Current Scottish Government Energy Policy

84. In December 2017, the Scottish Government published two energy policy documents, comprising the following:

- the Scottish Energy Strategy 'The Future of Energy in Scotland' (SES); and
- the Onshore Wind Policy Statement (OWPS).

85. Together, these policy documents represent the Scottish Government's intended energy and climate change strategy for the period to 2050. Further information in respect of these documents is contained in the following text.

Scottish Energy Strategy 2017

86. The Scottish Government published its SES in December 2017. The SES sets out a vision for a strong and sustainable low carbon economy. SES describes the Scottish Government's vision for the future energy system in Scotland beyond 2020 looking forward until 2050.

87. The SES is designed to provide a long term vision to guide detailed energy policy decisions over the coming decades. It sets out the priorities for an integrated system-wide approach that considers both the use and the supply of energy for heat, power and transport. It contains six energy priorities including increasing renewable energy production and increasing flexibility, efficiency and resilience of the energy system.

88. The main document was published alongside the OWPS. This document provides focus for onshore wind.

89. The SES 2017 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. It advises that it has a vision for:

> *"a flourishing, competitive local and national energy sector, delivering secure, affordable, clean energy for Scotland's households, communities and businesses."*

90. The SES 2017 sets two new targets for the Scottish energy system by 2030. These are:

- *"The equivalent of 50% of the energy for Scotland's heat, transport and electricity consumption to be supplied from renewable sources; and*
- *An increase by 30% in the productivity of energy use across the Scottish economy."*

91. Reaching 50 % in the 13 years from the publication of the SES will be challenging, despite the good progress being made with the equivalent of 17.8% being met by renewable sources in 2015, and the SES acknowledges this.

92. Renewable and low carbon solutions are identified as one of six energy priorities around which the 2050 vision is built. The document advises that the Scottish Government "*will continue to champion and explore the potential of Scotland's huge renewable energy resource, and its ability to meet our local and national heat, transport and electricity."*

93. Under the heading of Renewable Energy, the SES is clear that the Scottish long term climate change targets will require the near complete decarbonisation *"of the Scottish energy system by 2050 and that renewable energy is anticipated to meet a significant share of this".*

94. In the section on Onshore Wind, the SES advises that *"onshore wind is now amongst the lowest cost forms of power generation of any kind and is a vital component of the huge industrial opportunity that renewables create for Scotland".* Onshore wind is identified as being required to play a vital role in the future of Scotland, helping to decarbonise electricity, boosting the economy and meeting demand. The SES notes that in order to achieve the targets it means developers and communities working together and striking the right balance between environmental impacts, local support, benefit and where possible economic benefits deriving from community ownership.

Onshore Wind Policy Statement

95. The OWPS reaffirms the Scottish Government's onshore wind policy set out in previous publications. The Ministerial Foreword is clear that there is no question that onshore wind has played a dominant and hugely successful role in contributing to the targets. It notes that onshore wind plays a valuable role in the empowerment and reward of local communities which are located near developments. The document focuses on the need to support development in the right places including, where acceptable, the inclusion or larger turbines, with effects and impacts of proposed developments being considered on their merits. The need to strike the right balance between environmental effects and impacts, local support and economic benefits is highlighted. It includes separate sections on the following key priority areas:

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

96. The section on Route to Market makes it clear that the Scottish Government expect *"onshore wind to remain at the heart of a clean, reliable and low carbon energy future in Scotland."* Onshore wind is to remain *"crucial in terms of meeting the goals for a decarbonised energy system."* The Scottish Government is clear that the approach taken in the OWPS means that "*Scotland will continue to need more onshore wind development and capacity, in locations across landscapes where it can be accommodated*."

97. The OWPS is clear that the Scottish Government believe that *"new onshore wind projects can and must be developed with no additional subsidy cost to consumers."* The OWPS invites "a*pplicants to explain clearly how environmental impacts have been balanced against energy yield during design iteration and reported as part of the information provided in support of applications*." **Chapter 2** of the EIA Report sets out the design evolution process and sets out the expected yield associated with the turbines for the proposed development.

98. The OWPS is clear that innovative solutions such as the integration of energy storage within onshore windfarm proposals not only help improve the ability of variable generators, such as onshore wind, to manage generation and demand but can also help grow the supply chain. The OWPS states "*continuing support for innovation – for example, the development of smarter networks, active management and storage technology – can have a positive effect on the integration and economics of onshore wind generation. Innovation in the onshore wind sector can help the Scottish supply chain to grow, creating jobs and opportunities, and securing Scotland's position as a hub for innovation and investment*."

99. In the Chapter on Community Benefits the OWPS advises that "*As of November 2017 over £12 million [in community benefit payments] has been paid out over the preceding 12 month period*". The community benefit being offered by the Proposed Development is set out in Section 2.3 of this Planning Statement and is considered to be a valuable contribution to the community.

100. The OWPS is clear that the Scottish Government is keen to see a significant increase in shared ownership of renewable energy projects delivering long lasting economic assets to communities across the country.

101. The progress to the renewable energy targets is considered to be an important material consideration.

Climate Change Plan, The Third Report on Proposals and Policies 2018-2032

102. The Scottish Government published the Climate Change Plan, The Third Report on Proposals and Policies 2018-2032 (CCP 2018) in February 2018 which sets out Scotland's decarbonisation plans to 2032. The Executive Summary advises that the CCP 2018 sets out how Scotland can deliver its target of 66 % emissions reductions, relative to the baseline for the period 2018-2032.

The Climate Emergency

103. In May 2019 the Scottish Government declared a climate emergency. At the same time in Westminster the Environment Secretary acknowledged a climate change emergency.

104. 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."*

105. 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."*

106. National Planning Policy in the form of National Planning Framework 3 (NPF3) and Scottish Planning Policy

(SPP) also recognise the benefits which renewable energy project can bring. NPF3 support Governments energy policy initiatives through the land use planning system. SPP seeks to ensure Development Plan policy for renewable energy projects takes a balanced approach, encouraging the right development in the right place. To this end it sets out a formula for local authorities to create a 'spatial framework' within their development plans which sets out areas which might be considered suitable for onshore wind development based on a range of identified criteria. It encourages development which contributes to sustainable economic development. Details of relevant parts of the NPF3 and SPP can be found in Section 4.3. It should be noted that NPF3 and SPP were prepared prior to the publication of the current Scottish Government policy in the form of SES and the OWPS. It is anticipated that when NPF3 and SPP, and likely combined, are updated they will reflect the drive for renewables contained in the SES and the OWPS 2017 in line with the Ministers comments on the climate change emergency.

107. A further key point of consideration is the findings of the EIA. The EIA Report sets out the design process for the proposed development and how that has been shaped and influenced by the policy documents set above. It sets out the final proposal and the mitigation which is considered in the assessment (as set out in brief in Section 2 of this Planning Statement). It systematically considers the potential significant effects on the environment which might occur as a direct or indirect result of the proposed development, should it go ahead, based on a series of topics agreed with statutory consultees and the mitigation measures which may be required to balance those effects. The topics take cognisance range of guidance and advice on methodology and industry best practice.

108. The wider benefits of the proposed development must be weighed against any significant effects of the proposed development to take a view on the overall acceptability of the proposed development.

Scottish Climate Change Bill (2018)

109. The new Scottish Climate Change Bill (2018) was passed by the Scottish Parliament on 25 September 2019 and sets a legally binding target of net-zero greenhouse gas emissions by 2045 at the latest, with Scotland becoming carbon neutral by 2040. Scotland will not only have to meet the net-zero target for 2045, but also to reduce emissions by 56% by 2020, 70% by 2030 and 90% by 2040. These are currently the most ambitious statutory targets in the world.

4.2 Progress to the Scottish Renewable Energy & Electricity Targets

4.2.1 Renewable Energy Targets

110. The targets that are set for renewable energy are described in Appendix 2 of this Planning Statement. As it is acknowledged that the proposed development would not be contributing energy to the national grid until after 2023, post 2020 targets are of more relevance to the proposed development. Table 4-1 sets out the relevant targets post 2020.

Table 4-1
Scottish Renewable Energy Targets

Target	Current Position
Overall renewable energy target – total Scottish energy consumption from renewables 50% by 2030	19.1% in 2017
Renewable Electricity Target – Gross electricity consumption from renewables 100% by 2020	76.3% in 2018

(Source Energy Statistics for Scotland Q2 2019 Figures)

111. The Scottish Government estimates that, in 2018, renewable sources generated the equivalent of approximately 74.6% gross electricity consumption. (Energy Statistics for Scotland Q4 (Scottish Government 2019)).

112. Chapter 1 of the Routemap for Renewable Energy in Scotland Update 2015 (see **Appendix 2** of this Planning Statement) states that the 2020 renewables target of 100 % equates to the equivalent of circa 16 GW of installed capacity. The most recent Renewable Electricity Planning Statistics for Scotland advise that as of September 2019, Scotland had in the region of 11.6 GW of installed renewable energy capacity the majority of which was wind generation projects. The total renewable energy capacity, by stage in Scotland was as follows:

- planning applications – 4.2 GW;
- projects awaiting construction – 7.6GW;
- projects under construction –1.2GW; and
- operational projects – 11.6 GW.

113. The information provided shows that there is a significant shortfall against the Scottish 2020 renewable electricity generation target as the 'operational' and 'under construction' figures together equate to 12.8 GW of the required 16 GW. It is considered that many of the schemes which are awaiting construction are historic and are no longer viable and therefore will not be built. It can also be argued that some of the schemes which are in planning are no longer viable and will never be built, even if consented.

114. It is recognised that the targets which have been set by the Scottish Government are a target and not a cap, as set out in the letter from the Chief Planner to the Heads of Planning (2015). This letter advises that the Scottish Government target to generate at least 100 % of gross electricity consultation from renewables by 2020 does not place a cap on the support for renewable energy development, which includes onshore wind farms, should the target be reached.

115. It is considered that although the proposed development would not be operational before 2020 it would make a valuable contribution to meeting any shortfall in the 2020 target. If post 2020 Scotland is starting from a point behind where Scotland is targeted to be, then there will be a clear need to increase capacity at greater speed. In this context the proposed development would therefore make an important contribution to what is anticipated to be an unmet and uncapped target.

116. The international, UK and Scottish contexts set a framework of ambitious targets which should be met and exceeded if possible. It is considered that the international, UK and Scottish Renewable Energy Policy are all important considerations and should be afforded significant weight in the decision making process. This approach is supported by the Reporter in the case of Windy Edge Appeal Decision (Reference PPA-140-2055, June 2016) who stated that:

> *"It seems to me that there is no doubt that there is strong support in Scottish Government planning and energy policy for further renewable energy developments, including new commercial scale wind farms."*

117. In the case of Windy Edge (Reference PPA-140-2055, June 2016) the output of the proposed development was 22.5 MW which the Reporter described as a modest but still important contribution towards the various targets set at the European, UK and Scottish level.

118. Since Windy Edge the Scottish Government has published the SES 2017 and the OWPS 2017. These

documents are clear that there is an intensification of the need for renewable energy developments and in particular onshore wind farm developments. There is a clear need for new projects to come forward as quickly as possible to meet the demand, it is accepted that this does not mean that all projects that come forward should be consented. This is interpretation has been supported in the case of Pencloe Wind Farm 2018 (Reference WIN-140-4) where the Reporter stated:

> *"I see no sign that the Scottish Government is slackening the pace; rather, the latest policy statements on energy and onshore wind indicate that the effort is being intensified. The latest target of generating 50% of energy from renewable sources by 2030 is a deliberately challenging one, which may require around 17GW of installed capacity by that date. The newly adopted Scottish Energy Strategy and the accompanying Onshore Wind Policy Statement are explicit that onshore wind will continue to play a vital role in that regard.*
>
> *The Scottish Government's latest energy strategy expects onshore wind to help decarbonise Scotland's electricity, heat and transport systems, boost the economy, and meet demand.*
>
> *I can only conclude that the Scottish Government remains firmly committed to the development of onshore wind energy, and that the relative success achieved so far in pursuit of renewable energy targets is not a persuasive argument against the future approval of new such schemes."*

119. The proposed development would have an installed capacity of between 56-80 MW, which would make an important contribution to Scottish Government targets on renewable energy and carbon emission reductions.

120. The proposed development supports Scottish Government's desire to see substantial growth in renewables (including onshore wind) with reducing dependence on financial support mechanisms, as set out in the SES 2017 and OWPS 2017. This is a challenging set of policy objectives, but the proposed development seeks to meet these objectives whilst also ensuring the development is acceptable in terms of environmental impact and residential amenity considerations. The impacts of the proposed development are considered in the EIA Report and summarised in Section 4 of this Planning Statement.

121. Significant weight should be attached to the strong support of the Government for the development of renewable energy, and onshore wind energy as part of that. The proposed development draws considerable support from the policy material discussed in this Section of the Planning Statement. In particular it would make a meaningful contribution towards targets for renewable energy and it is considered to be commercially viable on a subsidy free basis as a result of the proposed tip height.

4.2.2 Clashindarroch II Wind Farm Contribution to Targets and National Policy Objectives

122. It is anticipated that the proposed development would have a total installed capacity of between 56 and 80 MW and (based on currently available turbines and assuming the same supplier for all turbine positions). This means that the proposed development would produce between 183 and 262 GWh of electricity annually (based on site derived capacity factors of 37.5%). This equates to the power consumed by between approximately 48,664 and 69,558 average family homes[5].

123. The use of the proposed turbines, rather than turbines of the same scale as the existing Clashindarroch turbines, means that the proposed development could produce 2.5 times more GWh than the existing

[5] Calculated using the most recent statistics from the Department of Business, Energy and Industrial Strategy (BEIS) showing that annual UK average domestic household consumption is 3,781kWh (RenewableUK, 2018). Calculation is based on 5.6 MW based on currently available turbines and assume a consistent supplier for all turbine locations (MW x capacity x 8760)/3.781 – where 8760 is number of hours in a year.

Clashindarroch Wind Farm for less turbines.

124. Turbines with a maximum height of 180 m to blade tip have been selected due to the increased yield that can be achieved from taller turbines and also the environmental benefits intrinsic to larger turbines. Using taller turbines means that the overall number of turbines required on a per MW basis is reduced, which in turn reduces the scale of the associated infrastructure required. With larger turbines the amount of concrete per MW produced is lower than a scheme with smaller turbines, and similarly the length of new access track (km) required per MW produced is also generally less. Less and fewer, but taller turbines reduce the felling required by increasing the rotor clearance above the tree canopy which reduces the impacts upon existing forestry operations. Overall, larger turbines of this scale would help to deliver new onshore wind capacity required to help the UK and Scottish Government meet its climate goals whilst providing low-carbon power.

125. The energy capture estimated for the proposed development is the result of the overall positive impact of accommodating larger rated capacity and the larger rotor (swept area) available at higher hub heights. The resultant improvement in the efficiency, economics and commerciality of the scheme would enable the Applicant to reduce the cost of energy from the proposed development, giving a positive benefit to consumers in terms of electricity cost.

126. In recent years, the onshore wind industry has experienced the reduction in supply of smaller turbines across Europe due to lack of demand from mainland Europe, where the tendency is to install turbines at higher tip heights (e.g. 175 – 240m to blade tip). Therefore, it is highly unlikely that a range of smaller turbines (e.g. 120m) would be available at competitive prices by the time the proposed development is ready to be constructed. Larger turbines need to be considered if onshore wind development is to continue to make a contribution to both the UK and Scottish Government's renewable energy targets.

127. Significant weight should be attached to the strong support of the Government for the development of renewable energy, and onshore wind energy as part of that. The proposed development draws considerable support from the policy material discussed in this Section and Appendix 2 of this Planning Statement. In particular it would make a meaningful contribution towards targets for renewable energy and it is considered to be potentially commercially viable on a 'subsidy–free' price basis as a result of the tip height. This would help to deliver new onshore wind capacity required to help the Scottish Government meet its climate goals and provide low-carbon power that will keep consumer bills down. In the event that the 2020 targets are not achieved, the proposed development would contribute significantly to making up the shortfall and help create the circumstances which make future targets more achievable. In the increasingly unlikely event that the 2020 targets are met then the proposed development would contribute significantly to longer reaching targets.

4.3 National Planning Policy

4.3.1 National Planning Framework for Scotland (NPF3)

128. The National Planning Framework (NPF3) was laid before the Scottish Parliament on June 23rd, 2014 and sets the context for development planning in Scotland. It is a long term strategy for Scotland and is considered to be an expression of the Government's economic strategy. It provides a framework for the spatial development of Scotland as a whole and identifies 14 national developments which support the strategy.

129. The Town and Country Planning (Scotland) Act 1997 as amended by the Planning etc. (Scotland) Act 2006 puts the NPF3 on a statutory footing and provides the national context for development plans and planning decisions, as well as informing programmes of the Scottish Government, public agencies and

local authorities.

130. There is high level support for the promotion of renewable energy developments throughout many parts of NPF3. 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.

131. 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 consistent with our world-leading climate change legislation."*

132. Paragraph 3.7 states that the planned approach has ensured that onshore wind energy 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.

133. In the section, *'Scotland tomorrow'*, the Scottish Government 2020 targets of a reduction of 12% in the total final energy demand, 30% of overall energy demand from renewables and the generation of at least 100% of gross electricity consumption are reaffirmed and the Electricity Generation Policy Statement 2013 sets out how these targets will be met.

134. Paragraph 3.9 makes it clear that the Scottish Government wants to continue to capitalise on the wind resource of Scotland. By presenting an application that maximises the potential of the Site to generate electricity whilst respecting environmental considerations it is submitted that the proposed development is seeking to capitalise on the wind resource within Aberdeenshire.

135. NPF3 advises that, whilst Scotland is making good progress in diversifying the energy generation capacity and lowering carbon emissions, more action is required by way of continuing to capitalise on the wind resource to ensure security of supply. Paragraph 3.22 makes it clear that onshore wind development will continue to make a significant contribution to the diversification of energy supplies.

4.3.2 Scottish Planning Policy 2014 (SPP)

136. SPP provides the planning policy of the Scottish Government relating to nationally important land use matters. It is an important material consideration as it reflects the Scottish Ministers' priorities for the operation of the planning system and for the development and use of land.

SPP Vision

137. The introduction of SPP sets out planning outcomes which are designed to explain how planning should support the vision of the SPP. Three of the four are considered to be relevant to the consideration of the proposed development. These are:

- Outcome 1: A successful sustainable place;
- Outcome 2: A low carbon place; and
- Outcome 3: A natural resilient place.

138. The proposed development would assist in achieving all three of these outcomes because it is considered

to be a sustainable development which would assist in meeting targets for carbon reduction; the proposed development would assist in creating a more sustainable energy mix and it would assist in ensuring a resilient place which seeks to facilitate the sustainable use of Scotland's natural assets.

139. Outcome 2 is perhaps the most relevant and it explains that NPF3 will facilitate the transition to a low carbon economy, particularly by supporting diversification in the energy sector. Paragraph 18 refers to the 2009 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 more recent publications.

140. In the cases of Corlic Hill Wind Farm (Reference PPA-280-2022, May 2016) and Windy Edge Wind Farm (Reference PPA-140-2055, June 2016) the Reporters placed significant weight on the benefits of the potential energy generation of those schemes to generate substantially less than the proposed development. In the case of Corlic Hill, the Reporter found that the output of the proposed wind farm represented:

> *"a valuable contribution to Scottish, UK and international targets for greenhouse gas emissions reduction and the use of renewable energy". He went on to conclude that "it would also potentially assist in providing greater security of supply in the Scottish energy market by potentially displacing imported energy."*

141. The Reporter gave this benefit of the scheme significant weight.

SPP Principle Policies

142. SPP sets out two Principal Policies – Sustainability and Place Making. In the context of sustainability paragraph 24 states that:

> *"The Scottish Government's central purpose is to focus government and public services on creating a more successful country, with opportunities for all of Scotland to flourish, through increasing sustainable economic growth." Where sustainable economic growth is defined as: "building a dynamic and growing economy that will provide prosperity and opportunities for all, while ensuring that future generations can enjoy a better quality of life too."*

SPP Presumption in Favour of Development

143. SPP 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."*

144. The proposed development is a form of development which by its nature is inherently sustainable, and as such should gain support from paragraph 28 of the SPP. The Aberdeenshire Development Plan is up to date and contains policies relevant to the proposed development and so although the presumption is a material consideration, it is not considered to be a significant material consideration.

145. 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.

SPP Development Management

146. Under the heading Development Management, Paragraph 32 states:

"the presumption in favour of sustainable development does not change the statutory status of the Development Plan as the starting point for decision-making. Proposals that accord with up-to-date plans should be considered acceptable in principle and consideration should focus on the detailed matters arising."

147. In the case of Lochend, The Highland-wide Local Development Plan was up to date and the Appeal decision (Reference PPA-270-2018 December 2014) advises:

"The SPP also states that there should be a presumption in favour of development that contributes to sustainable development, listing at paragraph 29 a number of principles to guide decisions. Included amongst these are supporting the delivery of infrastructure (including energy) and supporting climate change mitigation, both of which the appeal proposal would assist with. Having assessed the detailed impacts of the proposal, I find that it would not be in significant conflict with any of the other principles of sustainable development listed in the SPP. I am satisfied that this proposal is for a development which would contribute to sustainable development".

148. In the case of Windy Edge (Reference PPA-140-2055, June 2016), the Reporter, in the context of the Scottish Borders Local Development Plan, wrote:

"I also note that one of the policy principles is that there should be a presumption in favour of development that contributes to sustainable development. I consider that a proposed wind farm with acceptable environmental impacts is a development that the Scottish Government would consider as development that contributes to sustainable development".

149. For the reasons stated in Section 9 of this Planning Statement the proposed development is considered to be in accordance with the Development Plan. It is considered that the presumption in favour of sustainable development is an important consideration which should attract significant weight in favour of this application in the determination process.

SPP Scheduled Monuments

150. SPP paragraph 145 relates to Scheduled Monuments (SMs) and is applied only to such designated sites. The SPP Glossary definition of SMs advises that they are:

"Archaeological sites, buildings or structures of national or international importance. The purpose of scheduling is to secure the long term legal protection of the monument in the national interest, in-situ and as far as possible in its existing state and within an appropriate setting".

151. Paragraph 145 of SPP states:

"Where there is potential for a proposed development to have an adverse effect on a scheduled monument or on the integrity of its setting, permission should only be granted where there are exceptional circumstances. Where a proposal would have a direct impact on a scheduled monument, the written consent of Scottish Ministers, via a separate process is required in addition to any other

consents required for the development."

152. It is understood from paragraph 145 of SPP, and the definition of SMs, that SMs should be preserved within an 'appropriate setting'; and, that the proposed Development should avoid adverse effects on the 'integrity' of those settings. The EIA Report **Chapter 10, Archaeology and Cultural Heritage** advises that there are no predicted significant effects on heritage assets or their settings resulting from the proposed development. This test is therefore not considered further in this Planning Statement.

SPP A Low Carbon Place

153. SPP contains a number of subject policies; one of these is A Low Carbon Place. The importance that the role of NPF3 places on the transition to a low carbon economy is highlighted in paragraph 152 of SPP. Paragraph 153 advises that terrestrial planning facilitates the development of renewable energy technologies, links generation with consumers and guides new infrastructure to appropriate locations. It advises that efficient supply of low carbon and low cost generation of electricity from renewable resources are vital to reducing greenhouse gases. It also advises that renewable energy presents a significant opportunity for associated development, investment and growth in the supply chain.

154. In Paragraph 154 the SPP states (inter alia) that:

"The planning system should:

- *support the transformational change to a low carbon economy, consistent with national objectives and targets, including deriving:*
- *30% of overall energy demand from renewable sources by 2020*;*
- *11% of heat demand from renewable sources by 2020; and*
- *the equivalent of 100% of electricity demand from renewable sources by 2020;*
- *support the development of a diverse range of electricity generation from renewable energy technologies - including the expansion of renewable energy generation capacity - and the development of heat networks;*
- *guide development to appropriate locations and advise on the issues that will be taken into account when specific proposals are being assessed;"*

*It should be noted that the Scottish Government now have a target of 50% of overall energy demand to be met from renewable sources by 2030. This is addressed at Section 4.2 of this Planning Statement.

155. It is considered that the proposed development would be consistent with the outcome of A Low Carbon Place and would provide a valuable contribution towards these targets.

SPP Onshore Wind Spatial Strategy

156. 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 below in Table 4-2:

Table 4-2
Table 1 of 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 2 km 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>

157. The Site is located predominantly within a Group 3 Area with potential for wind development. There is a small area of the Site which is in Area 2 Area of Significant Protection, due to the area of carbon rich soils, deep peat and priority peatland habitat. The presence of peat on the Site is a matter which has been carefully considered throughout the design evolution process. This has included peat probing work and consideration of peat depth, peat quality and peat slide risk. Further information is contained in Chapter 11 of the EIA Report. No turbines or infrastructure are located in the mapped carbon rich/ priority peatland area. In any event the mapping which is used in the SNH Carbon and Peatland Map 2016 is high level mapping which should not be used to rule out wind farm developments. SNH 'Spatial Planning for Onshore Wind Turbines – natural heritage considerations' guidance document makes this clear. It states that the national level map information:

> *"cannot (and should not) be used in isolation to determine the impacts of a specific development proposal on peat. This should be based on a detailed, site specific survey of peatland habitats and peat depths across the site using existing methods. ……. The location of a proposal in the mapped area does not, in itself, mean that the proposal is unacceptable, or that carbon rich soils, deep peat and priority peatland habitat will be adversely affected. The quality of peatland tends to be highly variable across an application site and a detailed assessment is required to identify the actual effects of the proposal, and to inform the location of site infrastructure…"*

158. The Draft Peatland and Energy Policy Statement issued by the Scottish Government provides a common basis from which it and its agencies act in developing and implementing policies in relation to peatland and energy. It contains clear advice and reiterates that the map is not to be used as a development management tool but is to assist in the preparation of spatial frameworks for onshore wind

developments.

159. It is concluded that the proposed development should therefore be seen as being located in a Group 3 location under the terms of SPP Table 1.

SPP Assessment of Criteria Set Out in Paragraph 169

160. The SPP states that local development plans should set out the criteria that will be considered in deciding all applications for wind farms of different scales - including extensions and re-powering. It is noted, at paragraph 169, that considerations will vary, relative to the scale of the proposal and area characteristics, but are likely to include:

- net economic impact, including local and community socio-economic benefits such as employment, associated business and supply chain opportunities;
- the scale of contribution to renewable energy generation targets;
- effect on greenhouse gas emissions;
- cumulative impacts - planning authorities should be clear about likely cumulative impacts arising from all of the considerations below, recognising that in some areas the cumulative impact of existing and consented energy development may limit the capacity for further development;
- impacts on communities and individual dwellings, including visual impact, residential amenity, noise and shadow flicker;
- landscape and visual impacts, including effects on wild land;
- effects on the natural heritage, including birds;
- impacts on carbon rich soils, using the carbon calculator;
- public access, including impact on long distance walking and cycling routes and scenic routes identified in the NPF;
- impacts on the historic environment, including schedules monuments, listed buildings and their settings;
- impacts on tourism and recreation;
- impacts on aviation and defence interests and seismological recording;
- impacts on telecommunications and broadcasting installations, particularly ensuring that transmission links are not compromised;
- impacts on road traffic;
- impacts on adjacent trunk roads;
- effects on hydrology, the water environment and flood risk;
- the need for conditions relating to the decommissioning of developments, including ancillary infrastructure, and site restoration;
- opportunities for energy storage; and
- the need for a robust planning obligation to ensure that operators achieve site restoration.

161. These criteria cover and go beyond the matters which are identified in Schedule 9 for consideration in S36 applications.

162. The following text of the Planning Statement summarises the key findings of the environmental effects of the proposed development which are presented in the EIA Report in the context of the test set out in SPP. This draws on the EIA Report submitted as part of the application. This demonstrates that the matters referred in Schedule 9 of the 1989 Act have been considered by the Applicant. This Section of the Planning Statement considers the technical tests for the proposed development and for ease of reference they are ordered as per the criteria set out in SPP Table 1 and paragraph 169.

Net Economic Impact (Criterion 1 of paragraph 169 of SPP)

163. The Applicant has a clear track record of delivering economic benefit as a result of their developments across Scotland. The BVG Report (September 2017) 'Economic Benefits from Onshore Wind' (BVG Associates, 2017), sets out some of the economic befits that have been realised as a result of the investments that a wind farm developer has made in south west Scotland. From this it is evident from recent experience, eight wind farms in south west Scotland subject of the BVG report, that suppliers of a wide range of goods and services within Aberdeenshire and Scotland as a whole would obtain benefit from the proposed development.

164. The eight wind farms recently constructed will result in a £1.6 billion lifetime investment with 66% of this within the UK. The study showed that, for these wind farms alone, investment in the local area amounted to £257 million, in addition to which the schemes generated £297 million GVA and created 7,768 local full time equivalent (FTE) jobs. Other economic benefits include direct payment to community benefit schemes amounting to over £59 million over the 25 year lifetime of the wind farms.

165. Chapter 16 of the EIA Report anticipates that the proposed development could total approximately £52.64 million, including turbines, civil engineering works, electrical plant and grid connection. It is expected that construction phase expenditure of approximately £2.84 million would be spent in the Aberdeenshire and Moray administrative areas. An estimated £12 million would be expected to be spent in Scotland as a whole.

166. During the 18 months' construction phase, the proposed development is expected to support 84 FTE jobs. During the operational phase the proposed development is expected to require between 1 and 2 new full time employees (engineers and technicians) locally and a further 2-3 posts would be created elsewhere in Scotland. The effect on employment during the operational phase is considered to be positive.

167. The Scottish economy would be expected to be boosted by a total of £14.4 million of net gross value added (GVA) during the construction period. During the operational phase, the proposed development would contribute some £3.04 million in GVA to the local economy through direct, indirect and multiplier effects. This is considered to be a positive benefit of the proposed development.

168. Should the proposed development gain consent the Applicant is committed to offering a package of community benefits to local communities that would include the opportunity for the community to invest in the operational wind farm. The Applicant has already shared initial information with the community about their opportunity to invest. The Applicant would discuss with local stakeholders and Forestry and Land Scotland which communities would be the appropriate 'Community Organisations' to participate.

169. The Community Benefit Strategy for the proposed development advises that over the 30 year lifetime of the wind farm, the scale and nature of impacts across the Clashindarroch 2 may extend to:

- Support 38-55 employment opportunities;
- Delivery of 740-1,080m^2 floorspace:

- c. 290-430m^2 managed office space;
- c. 205-300m^2 general-purpose community hall to host community functions and events;
- c. 240-350m^2 tourism space to celebrate local heritage and culture;

- Purchase of c. 10-14 acres which could accommodate some 100 houses;
- Connecting c. 190-280 households or businesses to broadband;
- Building 870-1,260m of new rural road;
- Rehabilitation of 60-196m^2 residential properties;
- Delivery of c. 7,300-10,700m^2 of public realm improvements (i.e. new planting & paving);
- Purchase of 2-3 minibuses to provide additional mobility options;
- Support 1-1.6 Social Worker/Carer per annum to address issues of social isolation;

170. It is clear that the proposed community investment measures could offer real socio-economic benefits to the local community and do have the potential to be significant.

Contribution to Renewable Energy Generation Targets (Criterion 2 of paragraph 169 of SPP)

171. The proposed development would assist with the achievement of the UK and Scottish Government policies which set targets for renewable electricity generation. The proposed development would make a valuable contribution to the current targets. Governments at Westminster and Holyrood have made clear their ongoing commitment to the decarbonisation of electricity generation and the proposal would contribute to this policy objective.

172. The proposed development would have a total installed capacity of between 56 and 80 MW and (based on currently available turbines and assuming the same supplier for all turbine positions). This means that the proposed development would produce between 183 and 262 GWh of electricity annually (based on site derived capacity factors of 37.5%). This equates to the power consumed by between approximately 48,664 and 69,558 homes.

173. The use of the proposed turbines could produce in the region of 2.5 Gwh than using turbines of a similar size and specification as the existing Clashindarroch Wind Farm turbines on the Site.

174. The scale of the proposed turbines means that potential of the Site is being maximised to its full generation potential while carefully balancing the environmental impacts to ensure that the proposed development is environmentally acceptable.

175. It is concluded that the proposed development would make a valuable and meaningful contribution to government targets. This view is in keeping with Reporters and Scottish Ministers decisions on other renewable energy projects.

Effect on Greenhouse Gas Emissions (Criterion 3 of paragraph 169 of SPP)

176. The proposed development would make a valuable and significant contribution towards UK national generation targets and the reduction in emissions of greenhouse gases, principally Carbon Dioxide (CO_2) in becoming carbon neutral in less than one year.

177. The proposed development would make Scotland, and therefore the UK, less reliant on imported and price-volatile fossil fuels by generating energy to supply domestic needs of households.

178. The potential savings in CO_2 emissions due to the proposed development replacing other electricity sources over the lifetime of the wind farm (assumed to be 30 years and turbines of 5.5 MW for the purpose of the carbon calculator) are approximately:

- 232,709 tonnes of CO_2 per year over coal-fired electricity (6,981 million tonnes assuming a 30 year lifetime);
- 64,142 tonnes of CO_2 per year over grid-mix of electricity (1,924 million tonnes assuming a 30 year lifetime); or
- 113,825 tonnes of CO_2 per year over a fossil fuel mix of electricity (3,414 million tonnes assuming a 30 year lifetime).

179. It is concluded that the proposed development would make a valuable and meaningful contribution to the reduction of Greenhouse gas emissions.

Cumulative Impacts (Criterion 4 of paragraph 169 of SPP)

180. The cumulative impact of the proposed development has been considered in the EIA process. In particular it has been considered in the context of landscape, ornithology, ecology, cultural heritage and noise and is addressed in Chapters 7, 8, 9,10 and 14 respectively.

Landscape

181. The potential for cumulative impacts as a result of the proposed development is carefully considered in the EIA Report at Chapter 7.

182. It is acknowledged that the proposed development turbines would be larger than the existing turbines of Clashindarroch Wind Farm. In the case of the Pines Burn Wind Farm (Reference PPA-140-2069) which was consented Aug 2018 following a planning appeal cumulative design fit was a key issue. On this matter the Reporter concluded that:

'It is not unusual for wind farms, especially if extended, to comprise different turbines, and I am not aware that when built that aspect has been particularly contentious, nor has anyone brought such cases to my attention."

183. Chapter 7 of the EIA Report considers landscape and visual cumulative effects of the proposed development. It advises that the proposed development would represent a minor addition to the current visibility of wind farm development due to its limited ZTV and position directly adjacent to Clashindarroch Wind Farm. With the exception of some areas within the immediate surroundings, the proposed development would not create any new areas of wind farm visibility within the LVIA study area.

184. The main potential for cumulative effects therefore relates to the proposed development in addition to the Clashindarroch Wind Farm, and Dorenell Wind Farm. The main combined effects of the proposed development with the Clashindarroch and Dorenell Wind Farms relate to areas where they are potentially seen as one large wind farm or within the same portion of the view, which would be from a very limited number of locations within the LVIA study area, but particularly from the edge of the Correen Hills, south east of the Site.

185. Proposed wind farms within the study area are largely grouped in the north west part of the study area. These include Clash Gour, Pauls Hill II and Rothes III. These sites would essentially combine with the

operational and consented wind farms in this part of the study area to form very large groups of turbines. However, these proposed additions to the existing wind farms in this area would be sufficiently separated from the proposed Clashindarroch II Wind Farm by a combination of distance, direction and landform to avoid significant effects being identified in this assessment. The other proposed development within the study area is the Meikleton of Ardonald single turbine. This is located close to, and would essentially be seen grouped with the Cairnborrow Wind Farm. This limits the potential cumulative change in relation the baseline context and therefore the potential cumulative interaction, and effects, in combination with the proposed development.

186. The limited ZTV of the proposed development limits the potential for any significant sequential cumulative effects from any of the main roads or footpaths within the study area.

Ecology and Ornithology

187. The potential for cumulative impacts as a result of the proposed development on ecology and ornithology are considered in the EIA Report at Chapters 8 and 9 respectively. In the case of both no significant cumulative impacts are predicted as a result of the proposed development. Chapter 8 of the EIA Report considers the matter for Habitat Regulations Assessment in the context of the Tor Mor and Tip of Corsemaul SPA. Consideration of the potential implications of the proposed development, alone and in combination with other plans and projects, for the Tor Mor and Tip of Corsemaul SPA is provided in Technical Appendix 8.3 of the EIA Report. It is concluded that the proposed development, alone or in combination with current plans and projects, would not result in an adverse effect on the integrity of the Tor Mor and Tips of Corsemaul SPA..

Cultural Heritage

188. Chapter 10 of the EIA Report considers cultural heritage. No significant cumulative effects are predicted on cultural heritage or archaeology as a result of the proposed development.

Noise

189. The potential for noise to cause an unacceptable impact cumulatively has been carefully considered as part of the design process. The potential for unacceptable cumulative noise effects, as a result of the proposed development, were a key design factor. As a result of the design iteration process and the embedded mitigation no significant cumulative noise or vibration impacts are predicted as a result of the proposed development.

Summary of Cumulative Impacts

190. It is concluded that although there would be some significant landscape and visual cumulative effects, when considered in the round the cumulative effects, of the proposed development, are considered to be acceptable.

Impacts on Communities and Individual Dwellings (Criterion 5 of paragraph 169 of SPP)

Economic Impact

191. The proposed development offers to the opportunity for economic benefit to the local community. The local area currently benefits from the Clashindarroch Community Fund (CCF), which supports projects located within or directly benefiting one or more of the community council areas of Huntly, Strathbogie and Tap O'Noth and the area of the Cabrach Trust/Community Association. The Clashindarroch

Community Fund provides £5,000 per MW installed index linked for the operational life of the project resulting in over £180k annually towards community group projects in the form of grants from £500 to over £25,000.

192. Since 2015, more than £550,000 has been contributed to the CCF. Grants have been awarded to 65 projects including:

- 21 contemporary culture, events and recreational activity projects;
- 21 for improvements to community services and facilities;
- 17 to promote rural regeneration;
- 3 for cultural, historic and archaeological heritage projects; and
- 3 to preserve/ enhance the natural environment for residents and visitors.

193. Benefits would accrue from the scale and nature of the proposed income streams, which would include the proposed development, and, depending on the choices made, could have a positive effect on the physical and mental well-being of local residents as well as economic benefits. The long term nature of the income, arising from community benefit, would allow the community to plan ahead, to draw in other sources of match funding to maximise the benefits and investment projects could be designed to match local priorities.

Landscape

194. The impact of the proposed development, in landscape terms, on communities, is considered in the EIA Report at Chapter 7. The settlements, and property clusters, which have been considered include: Tillathrowie, Huntly, Rhynie, Haugh of Glass, Brdgend and Cabrach,.

195. The conclusions of the EIA Report LVIA, presented in Chapter 7, advise that significant visual effects upon local residents would be very limited, restricted to a few houses to the north east of the Site at Tillathrowie where the turbines would be beyond 2km at its closest point and within a relatively narrow horizontal extent of the available views. There would be no visibility from any of the larger villages within the study area.

196. Visibility from the main roads within the study area has been considered in the LVIA. Chapter 7 of the EIA Report concludes that visibility would be limited due to the landform and no significant effects were assessed for main road users. Localised significant effects upon road users of the minor roads providing access to Tillathrowie and Coynachie due to the proximity of the proposed development, and a short stretch of a local road south west of Rhynie, were assessed on the basis of framed views of the proposed turbines and Tap o' Noth.

Residential Visual Amenity

197. Some significant landscape and visual effects, as a result of any proposed commercial wind farm, are unavoidable. Any wind farm proposed within 2km of residential properties has the potential to cause significant visual effects on properties. This, however, is not necessarily unacceptable as there is a long held planning principle that there is no right to a view from a private property and each development needs to be considered on its respective merits. With residential amenity the issue is therefore not simply that there is a significant effect on a property, but rather is that effect such that the property would become an unacceptable place to live because its amenity is so degraded by the presence of the wind farm.

198. This approach, which is often referred to as the Lavender Test, after the Inspector who formulated it, has been applied in a number of decisions relating to English cases and is articulated in a number of Scottish Reporters' and Ministers' decisions relating to wind farms. In the case of the Windy Edge Appeal Decision (Reference PPA-140-2055, June 2016) the Reporter stated:

> *"I think it is important to differentiate between the general landscape and visual impacts which local residents would experience and the particular impacts on any individual property. A significant change to a view is not necessarily harmful in planning terms. …. It is more than a significant change to a view or that any individual resident would prefer not to live near a wind farm. The visual impact would have to be excessively dominant."*

199. In their Report on the proposed Fauch Hill/Harburnhead Wind Farms (Reference PPA-400-2084 and EC00003190 respectively, July 2014) the Reporters stated that "*the generally agreed guidance on the level of visual impact is known as the Lavender Test which assesses whether a property would become an unacceptable place to live because of the development*."

200. In their decision in relation to the proposed Afton Wind Farm (Reference EC00003134, October 2014) the Scottish Ministers advised that they considered that *"the development would not result in any over bearing visual effects on residential amenity to a degree that any property might be considered an unattractive place in which to live."*

201. The EIA Report includes a Residential Visual Amenity Assessment (RVAA) at Technical Appendix 7.3. This has been carried out in accordance with the approach set out in the Landscape Institutes Technical Guidance Note 2/19 Residential Visual Amenity Assessment. This has considered the impact of night time lighting as well as the daytime effects.

202. The RVAA, in Technical Appendix 7.3, advises that fifteen residential properties and eight groups of residential properties were identified as having potential views of the proposed development, within the ZTV of the 5km RVAA study area from the nearest proposed turbine. These properties were visited from the nearest publicly accessible location to assess the predicted magnitude of change and the nature of the view which is likely to be obtained. Views of existing, consented and proposed wind farms were also considered from each of the property groups and individual properties.

203. No properties lie within 1km of the proposed turbines, which contributes to reducing the potential for overbearing or overwhelming effects in the so-called Lavender test. In addition, no properties within 2km have any visibility of the proposed development. Major effects were predicted for three properties at between 2.94km and 3.91km. At these properties, it was considered that although the proposed turbines visible would potentially be noticeable features, distance and intervening landform as well as the relationship of the proposed turbines to the adjacent landform, would avoid the potential for overbearing or overwhelming effects.

204. The effects of the proposed development on residential visual amenity is considered to be acceptable.

Noise

205. The potential for noise to impact on the local community and individual properties has been carefully considered as part of the design iteration process. As a result of this process no significant noise or vibration impacts are predicted on local communities and individual dwellings as a result of the proposed development. It is anticipated that there would be a condition relating to noise should deemed planning permission be forthcoming.

Shadow Flicker

206. The potential for the proposed development to result in shadow flicker has been considered in the EIA Report. EIA Report Figure 17.1 shows the 1,450m study area and illustrates that no residential properties would lie within 10 rotor diameters of the proposed turbine locations or the turbines of the Clashindarroch II Wind Farm. Consequently, no unacceptable shadow flicker effects are predicted.

Private Water Supplies

207. The potential for private water supplies to be impacted by the proposed development has been considered in the hydrological assessment and the findings of the work undertaken is presented in Chapter 11 of the EIA Report. Figure 11.2 and Table 11-11 of the EIA Report confirm that all of the confirmed private water supply sources are more than 500m from the proposed development infrastructure and therefore more than the 100m and 250m separation buffers specified in SEPA guidance. It is therefore concluded that there would be no significant impacts on private water supplies as a result of the proposed development.

Traffic

208. Chapter 13 of the EIA Report considers the impact of the proposed development on the local community. It is understood that nearby residents maybe concerned over traffic movements in this area during the construction period. It is understood that there were no issues raised in respect of the construction of the existing Clashindarroch Wind Farm during the construction period. In order to address these concerns a Construction Traffic Management Plan (CTMP) which would be prepared prior to the commencement of the proposed development. The principal mitigation measures that the CTMP will cover are summarised as follows:

- methods for accessing the Site;
- site access Improvements;
- contractor responsibilities;
- abnormal load management;
- onsite management;
- adverse weather conditions; and
- driving and speed restrictions.

209. This TMP would be agreed with Aberdeenshire Council.

210. The impact on the traffic and transport network is considered to be acceptable.

Summary on Cumulative Impacts

211. No significant effects have been identified through the EIA process in respect of potential impacts on communities and individual dwellings. It is concluded that there are no effects on local communities and individual dwellings that mean that the proposed development is unacceptable.

Landscape and Visual Impacts

212. An assessment of the landscape and visual impacts (LVIA) of the proposed development has been

undertaken as part of the EIA process. The assessment is included in the EIA Report at Chapter 7.

Visual Effects

213. The EIA Report Chapter 7 advises that the visual receptors that would experience the greatest magnitude of change are those using the Clashindarroch Forest for recreational purposes, walkers using the immediately adjacent hillsides and nearby residents, for whom the proposed development would become a defining feature, extending the presence of turbines from the Clashindarroch Wind Farm to the north east.

214. The EIA Report, Chapter 7, advises that the viewpoint analysis showed that open clear views of the proposed development would mostly occur from specific viewpoints on the summits of the distinctive outcrops within the study area, such as Tap o' Noth, The Buck, Clashmach Hill, The Knock, Bennachie, Ben Rinnes and Ben Aigan. The views available from these summits are panoramic and expansive showing a contrast from the settled, agricultural and wind farm landscape to the north east, to the remote and upland landscape to the south west. The location of the proposed development largely retains these characteristics of the views and due to its layout and position next to Clashindarroch Wind Farm, it would be a relatively limited addition to the proportion of the view affected by wind turbines.

Impact on Landscape Character

215. The LVIA contained in Chapter 7 of the EIA Report advises that the Site is particularly enclosed as due to the ridgeline of high ground to the west and south, combined with the generally undulating landform of the Grampian Outliers Landscape Character Area (LCA). This, combined with the close presence of the Clashindarroch Wind Farm, which has more turbines and is on higher ground, than the proposed turbines, means that the proposed development would not result in a fundamental change to the immediate landscape character. No significant effects were assessed on the landscape character areas beyond the immediate character area of the Grampian Outliers unit in which the proposed development would be located.

Impact on Landscape Designations

216. Chapter 7 of the EIA Report advises that no significant effects were assessed on any local or national landscape designation within the LVIA study area. Effects upon the special qualities of the Cairngorms National Park and also the Cairngorms Wild Land Area were not assessed as significant due to the limited predicted visibility, and orientation of the views towards the Site, in which the proposed development would mostly be seen behind the Clashindarroch Wind Farm. This reduces the additional horizontal extent of turbines visible, and combined with distance from these designations, the proposed development would be a minor to very minor addition to the views.

217. No significant effects on landscape designations are identified in the EIA Report. The impact of the proposed development on landscape designations is considered to be acceptable.

Landscape Capacity

218. The Strategic Landscape Capacity Assessment for Wind Turbines' (SLCAWEA) (2014) was produced by Ironside Farrar for Aberdeenshire Council. It assesses the landscape sensitivity, the capacity of landscape units to accommodate change and provides advice on how the scale, siting and design of development should be informed by local landscape character.

219. In brief, the SLCAWEA concludes that there is no underlying capacity for wind turbine development in the

Moorland Plateaux LCAs in which the proposed development would be located, primarily due *"to their importance to the Aberdeenshire landscape, high visual prominence, high relative wildness and recreational value."*

220. It is concluded that the extent and scale of landscape and visual effects of the proposed development mean that there is landscape capacity for the proposed development.

Night Time Assessment

221. It is clear that the height of the proposed turbines means aviation lighting is required in accordance with the policy set out by the Civil Aviation Authority. This is set out in Chapter 3 of this Planning Statement and in the EIA Report in Chapter 3.

222. The LVIA, EIA report Chapter 7, advises that these lights would contrast with the generally dark rural context of the site. They would not introduce a new or unique feature into the night time context, as there are several existing sources of artificial light in the LVIA study area, including settlements, dispersed properties and farms, industrial premises (particularly distilleries) and existing wind turbines. The way in which the lights would be seen differs from most of these baseline sources of light. The aviation lights would typically be seen as a series of red lights towards or above the horizon and increasing their relative prominence.

223. The LVIA has identified significant adverse effects in relation to lighting on landscape character and visual amenity for the limited parts of the study area within approximately 20 km from where the lighting would be visible. However, this should be considered in the context of there being few viewpoint locations suitable for the assessment of the aviation lighting of the proposed development. This is partly because such viewpoints need to have visibility of the turbine hubs, not just the blades and also the general need to select viewpoints from which the proposed development is typically likely to be seen, i.e. residential locations and roads. The ZTV in Figure 7.6, of the EIA Report, clearly demonstrates the relatively limited visibility of the turbine hubs from the more settled parts of the study area. This, in turn, would limit the extent of the effects resulting from the proposed aviation lighting.

224. The lighting of the proposed turbines is considered to be acceptable.

Summary

225. On balance, the significant effects of the proposed development are considered to be relatively limited for a wind farm of its size and scale. Aside from the unavoidable substantial changes within the Site and its immediate surrounds, the main significant effects relate to the relationship of the proposed development with Tap o' Noth which lies 5km to the south east of the Site. The majority of landscape and visual receptors within the study area would not have any effects from the proposed development and where effects were assessed, these would not be significant.

226. As shown in Table 7-15, of the 20 viewpoints assessed, significant cumulative effects on visual amenity were assessed for five locations, four of which are specific viewpoints i.e. hill summits or identified viewpoints, and one which was representative of a local residential area. It should be noted that specific viewpoints do not necessarily represent the wider area. Significant cumulative effects on landscape character were assessed for three of these locations. Table 7-15 also shows there are only significant cumulative effects on one landscape character area, two residential areas, three local roads, and local recreational routes within 5km of the Site. There would be no significant cumulative effects on the nationally designated CNP and related NSA and WLAs, as well as no significant cumulative effects on any local landscape designations.

227. It is acknowledged that there would be significant impacts on landscape and visual amenity as a result of the proposed development. The design has been subject to a comprehensive review process, to ensure that as far as reasonable landscape and visual impacts of the proposed development have been mitigated and avoided.

228. The final design for the proposed development has minimised effects within the wider landscape resource and ensured that the proposed development has an appropriate landscape fit within the scale of the host landscape types and wider surrounding landscape context. It is considered that there is capacity for the proposed development in this part of Aberdeenshire. For the reasons that are set out in the DAS, the EIA Report and this Planning Statement the proposed development is considered to be, acceptable in landscape terms.

Effects on the Natural Heritage, Including Birds (Criterion 6 of paragraph 169 of SPP)

229. The Site is not located within any international, national or local ecology or ornithological designations.

230. Chapter 8 of the EIA Report advises that the designated sites for birds for nature conservation, of importance at an international or national context, within 10 km of the proposed development are shown in the EIA Report at Figure 9.2. No such designated sites are located within or adjacent to the proposed development area.

231. The closest statutory site designated for its ornithological interest is the Tips of Corsemaul and Tom Tor SSSI, SPA and RSPB Important Bird Area (IBA). The closest part of the SPA (which consists of two separate locations), is approximately 6km north-west of the nearest proposed wind turbine. The IBA designation covers three separate areas to the north-west of the survey area; these are located at Gallow Hill, Tips of Corsemaul, and Ben Main. The ornithological interest of the site is related to breeding colonies of common gull.

232. There are a number of other biological SSSIs present within the wider area (for example, Craigs of Succoth SSSI and Hill of Towanreef SSSI). These sites are designated primarily for their botanical interest and the relative rarity of the grassland and heathland habitats associated with serpentine rock outcrops, an uncommon feature in Scotland.

233. Chapter 9 of the EIA Report identifies the ecology designated sites in the vicinity of the proposed development. Sites designated for nature conservation, of importance at an international or national context, within 10 km of the proposed development are shown in the EIA Report at Figure 9.2. No such designated sites are located within the Site boundary. Brief details of sites within 10 km, excluding sites designated solely for their ornithological interest) and sites designated solely for their geological interest, are provided in Table 4.3

Table 4-3
Statutory Ecology Designated Sites Within 10 km

Site Name	Designation	Distance/Direction from Proposed Development
Craigs of Succoth	SSSI	2.5 km north of the nearest wind turbine. The site application boundary is adjacent to this site, the main access track is c. 450 m from the SSSI boundary at its closest point.
Hill of Towanreef	SAC / SSSI	4.2 km South of the nearest wind turbine and 4.0 km from the application boundary.
Moss of Kirkhill	SSSI	9.3 km east-south-east of the nearest wind turbine and 8.2 km from the application boundary.
River Spey	SAC / SSSI	9.4 km west-north-west of the nearest wind turbine and 8.7 km from the application boundary.

234. A number of ornithology and ecology surveys have been undertaken and the results of these have been provided in the EIA Report at Chapters 8 and 9 respectively. The presence of ecological features, in particular wildcat, have been carefully considered as part of the design iteration process for the proposed development This has been done through the use of constraints mapping and design discussion workshops. Further information is contained in the EIA Report Chapter 2.

235. In the case of ornithology, the EIA Report advises that following consideration of a range of best practice and mitigation measures for the construction, operational and decommissioning phases of the development, the residual (mitigated) effects for all receptors combined would be not greater than minor/negligible and would therefore not be significant. It advises that the proposed development, in combination with other plans or projects considered in the cumulative assessment, would not result in any material adverse effect on any bird populations associated with SPAs in the region or adversely affect, directly or indirectly, any other statutory or non-statutory site designated for its ornithological importance.

236. In the case of ecology, the assessment of effects on key ecological receptors arising from the proposed development has identified the potential for unmitigated significant effects to occur from felling and construction activities. In particular, associated with the risk of pollution to watercourses with resulting effects on sensitive watercourses and fish populations downstream of the site. The unmitigated effects of disturbance associated with felling and construction of the wind farm could result in potentially significant effects on wildcat, red squirrel and pine marten. The unmitigated effects of the operation of the wind farm could also result in potentially significant effects on watercourses, fish, wildcat and bat populations.

237. The implementation of appropriate monitoring, site environmental supervision and good practice methods to avoid, minimise and control aquatic pollution during felling and construction will minimise the risk of effects on fish populations and aquatic habitats. As a result of this no significant residual effects are predicted on these receptors.

238. The mitigation proposed would include a number of measures including the following:

- Pre-felling and pre-construction surveys for the relevant protected species (i.e. badger, bats, otter, pine marten, red squirrel and wildcat) would be completed. The results would inform detailed protection plans that would be developed prior to works commencing. The protection plans would include appropriate best practice measures to ensure that the potential adverse effects on the species during felling and construction are avoided and that the works proceed lawfully; and

- A suitably experienced Ecological Clerk of Works (ECoW) or, in the case of felling, possibly a Forestry Ranger, would be appointed to supervise the implementation of, and adherence to, the agreed environmental protection measures for the duration of the pre-works, construction and site restoration phases of the project. The ECoW would have authority to immediately halt any works that have the potential to affect protected species or that would contravene the ecological / environmental commitments.

239. An outline Habitat Management Plan (HMP) has been developed, in consultation with SNH and FLS, which is principally intended to address the uncertain and potential long-term effects of the proposed wind farm on the wildcat population associated with Clashindarroch Forest (the implementation of the HMP would also have wider biodiversity benefits). The HMP proposals would be developed into fully detailed plans and prescriptions prior to commencement of the Project and as soon as possible following application determination. The HMP would include a commitment to measures to improve habitat connectivity for wildcat between Clashindarroch Forest and the large woodland blocks within the Strathbogie Wildcat Protection Area. There are also measures proposed in the outline HMP to protect and enhance important wildcat habitats within Clashindarroch Forest to ensure that there is no loss of denning opportunities and so that potential habitat fragmentation effects are avoided or minimised. The Applicant is also committed to assisting wildcat conservation action within the WPA through the financial support of a Wildcat Project Officer and to assist ongoing efforts to address wildcat hybridisation through a TNVR (trapping, neutering, vaccinating and release) programme for feral cats.

240. An outline HMP has been prepared and is submitted as Technical Appendix 9.5. If deemed planning permission is forthcoming it is expected that there would be a condition requiring the development and agreement of an HMP prior to the commencement of development.

241. The assessment of the proposed development has concluded, assuming that the proposed mitigation measures are implemented effectively, that all potentially significant adverse effects are avoidable for all sensitive ecological receptors. In relation to the HMP proposals, there is the potential to result in a net positive contribution to local biodiversity and national nature conservation policy objectives in the long-term.

242. The no significant effects which have been predicted on natural heritage, including birds but excluding landscape, are considered to be acceptable.

Impacts on Carbon Rich Soils, Using the Carbon Calculator (Criterion 7 of paragraph 169 of SPP)

243. The Site includes a small area of priority peatland. this is in the west of the Site. The areas of priority peat have been avoided by the proposed development. Further information on the areas of peat within and around the site is provided in Technical Appendix 11.1 of the EIA Report.

244. Each unit of wind generated electricity would displace a unit of conventionally generated electricity, therefore, saving power station emissions. Chapter 12 of the EIA Report provides a breakdown of the estimated emissions displaced per annum and over the assumed 30 year lifespan for the proposed development. The reference for the online Carbon Calculator Tool is UIX6-MDEN-BRYX.

245. The calculations of total carbon dioxide emission savings and payback time for the proposed development indicates the overall payback period of the proposed development, over a 30 year period, assuming 5.5 MW turbines, would be approximately 1.2-1.4 years, when compared to the fossil fuel mix of electricity generation.

246. This means that the proposed development is anticipated to take around 1.2-1.4 years to repay the

carbon exchange to the atmosphere (the CO2 debt) through construction of a wind farm; the Site would in effect be in a net gain situation following this time period and can then claim to contribute to national objectives.

247. The impacts of the proposed development on carbon rich soils has been carefully considered and is considered to be acceptable. The carbon calculator has been used to calculate the carbon payback which is considered to be acceptable.

Public Access (Criterion 8 of paragraph 169 of SPP)

248. The Land Reform (Scotland) Act 2003 conferred general access rights over much of rural Scotland. The lack of any designated or recorded paths within the site, does not necessarily preclude the right of the public to use the area for recreational purposes including for walking, cycling and horse riding.

249. It is expected that members of the public may use parts of the site for walking and cycling and horse riding informally. The EIA Report Chapter 16 advises that the provision of new tracks within the Site as a result of the proposed development would have a beneficial effect for users, although within the context of being managed as a commercial forest. There is not expected to be any change from the baseline position whereby the level of recreational use is relatively low key and not formally promoted. Given the temporary nature of the construction works, the measures that would be put in place and the low sensitivity of the receptors, the EIA Report concludes that the effect on such users would be negligible and not significant.

250. Walking is a popular activity within the study area with many upland tracks and paths being in evidence. Long Distance Recreational Routes which have been identified within the 40km study area and which are considered for assessment include:

- the Gordon Way is an 18km/11mile route which lies on the old peat extraction routes across Bennachie to Suie, approximately 15km to the south east of the Site at its closest point. Parts of the route are shown to have predicted visibility of the proposed development;
- the Speyside Way Long Distance Route lies within the study area from Buckie to Grantown-on-Spey. The ZTV illustrates that no part of the route would have any visibility of the proposed development due to its largely enclosed valley route and therefore it is not included in the assessment; and
- the Moray Coast Trail extends along the coast from Cullen in the east to Forres in the west. Predicted visibility for a short stretch south of Lossiemouth is shown on the ZTV, although at over 35km from the proposed development it is unlikely that there would be any significant effects upon users of this route.

251. The impact of the proposed development on public access is considered to be acceptable.

Impacts on the Historic Environment (Criterion 9 of paragraph 169 of SPP)

252. Chapter 10 of the EIA Report considers archaeology and cultural heritage. There are no World Heritage Sites or inventoried Battlefields within 5 km of the proposed turbines. There are no designated heritage assets within the proposed development area. The Site contains a range of post-medieval and modern agricultural heritage assets, set within a modern conifer plantation.

253. This EIA Report, Chapter 10, has considered data from a diverse range of sources in order to determine the presence of cultural heritage assets which may be affected by the proposed development. The potential effects on the identified assets, mitigation measures for protecting known assets during construction, and the recording of currently unknown features which could be lost, and the residual effect

of the proposed development have all been considered and no significant effects have been identified.

254. The EIA Report, Chapter 10, further advises that it is apparent that the Site lies within a landscape which has been farmed and settled over a long period, with assets dating from the later prehistoric to the present day. The potential for unknown assets dating from these periods to be found within the proposed development location is considered to be low, and the potential indirect impacts through development within the setting of designated heritage assets within the Outer Study Area has been found to be not significant in EIA terms, and the integrity of the scheduled monuments would remain intact.

Impacts on Tourism and Recreation (Criterion 10 of paragraph 169 of SPP)

255. The impacts of the proposed development on tourism and recreation are considered in Chapter 16 of the EIA Report. It undertakes a review of published reports which consistently find that there is no conflict between visitors and the development of onshore wind farms. These documents include:

- Visit Scotland (2014) Scotland Key facts on tourism 2014;
- Visit Scotland (2015) Scotland Visitor Survey;
- Glasgow Caledonian University, Moffat Centre, Cogentsi (2008) The Economic impact of Wind Farms on Scottish tourism. A Report for Scottish Government;
- Economy Energy and Tourism Committee 7th Report, 2012 Report on the achievability of the Scottish Governments renewable energy targets; and
- BiGGAR Economics (2016) Windfarms and Tourism Trends In Scotland– A Research Report.

256. The report by BiGGAR Economics on Wind Farms and Tourism Trends in Scotland, published in July 2016 (BiGGAR Economics, 2016), at which time installed onshore capacity had risen from 2.0 gigawatts (GW) in 2009 to 4.9GW in 2014. During this time employment in the tourism sector also rose by over 10% in Scotland as a whole.

257. The BiGGAR study specifically addressed the expectation that any impacts associated with a wind farm development are most likely to be felt strongest in the immediate vicinity of the proposed development. An analysis of the levels of employment in the sustainable tourism sector in the immediate vicinity of onshore wind farm developments did not find any evidence of these areas being adversely affected. On the contrary it was found that the tourism sector in the majority of areas surrounding wind farms grew faster than in the local authorities where they were situated.

258. This evidence was drawn out specifically in relation a number of sample study areas selected by the BiGGAR report for more detailed assessment, of which one (Hill of Towie) was located relatively close to the proposed development in Moray. The report shows that in Moray as a whole, tourism-related employment grew by 3.9% in the period 2009 – 2013. In relation to the specific study area around the Hill of Towie wind farm, the study found that tourism-related employment grew by 18.1% during the same period.

259. The overall conclusion of this review is that published national statistics on employment in sustainable tourism demonstrate that there is no relationship between the development of onshore wind farms and tourism employment at the level of the Scottish economy, either at local authority level or in the areas immediately surrounding wind farm development. Therefore, the likely effect of the proposed development when operational on the tourism and visitor economy is assessed as negligible and not significant.

260. The impact on public access, which includes recreation, has already been considered and this is not repeated. No impact on recreation in the Site is predicted.

261. The impact of the proposed development on tourism and recreation are considered to be minimal and therefore acceptable.

Impacts on Aviation and Defence Interests and Seismological Recording (Criterion 11 of paragraph 169 of SPP) (Criterion 11 of paragraph 169 of SPP)

262. The EIA Report considers the potential for the proposed development to impact upon aviation and defence interests in Chapter 15.

263. The proposed development is within the operational range of a number of aviation stakeholder radar systems. At a maximum blade tip height of 180 m, the proposed development is considered to be theoretically detectable by the NATS Allanshill PSR and the MOD Buchan ADR and be in an area that would have an operational significance to radar based air traffic and air defence services.

264. The Applicant acknowledges that the proposed development would be likely to have an effect on the Allanshill PSR and the Buchan ADR systems. Agreement on the use of identified mitigation options would conclude in the proposed development having an insignificant residual effect on NATS and MOD infrastructure and operations.

265. The EIA Report advises that it is highly likely that technical mitigation solutions could be implemented to resolve any predicted significant effects of the proposed development on the Allanshill PSR and the Buchan ADR. Following the implementation of the mitigation measures there would be no significant effects in EIA terms. It is anticipated that this mitigation would be the subject of a planning condition should consent be forthcoming.

266. No seismological effects are predicted as a result of the proposed development.

Impacts on Telecommunications and Broadcasting Installations (Criterion 12 of paragraph 169 of SPP)

267. The potential impact of the proposed development on telecommunications and broadcasting installations has been considered as part of the EIA Report. There is no indication that the proposed development would interfere with telecommunications links. There is no predicted impact on these facilities. This is considered to be acceptable.

268. If a problem with interference occurs that is linked to the operational phase of the proposed development, this would be dealt with using reasonable measures such as an onsite survey and/or installation of satellite television or upgrades of the current antennae system.

Impacts on Road Traffic (Criterion 13 of paragraph 169 of SPP)

269. The proposed turbines would be delivered to sit from Aberdeen docks, northwards along the A96 to the A920 Site access road. The EIA Report Chapter 13 considers the potential for the proposed development to have a significant impact on road traffic. The proposed development would not result in significant adverse effects with regards to Site access, traffic and transportation. The assessment has been based on the worst case scenario, with all rock material sourced from external site locations. Onsite borrow pits have been identified and it is anticipated that they would supply the Site with the majority of material required to construct the access tracks which would further reduce the amount of HGV movements required to build the proposed development. In summary, the proposed development would create an

increase to HGV traffic levels within the study area, but these levels would remain well within the design capacity of the local road network.

270. As stated in the context of impacts on communities and individuals a Construction Traffic Management Plan (CTMP) would be prepared should consent be forthcoming. It is anticipated that this would be the subject of a condition.

271. The impact of the construction phase on each of the identified environmental criteria has been categorised as 'not significant'. The impacts of the proposed development are considered to be acceptable.

Impacts on Adjacent Trunk Roads (Criterion 14 of paragraph 169 of SPP)

272. In order for the proposed turbines to be delivered to the Site they would need to travel along some trunk roads. Abnormal loads would be transported from Aberdeen docks along the A96 to the site access.

273. No significant impacts on the trunk road network are predicted as a result of the proposed development. This is therefore considered to be acceptable.

Effects on Hydrology, the Water Environment and Flood Risk (Criterion 16 of paragraph 169 of SPP)

274. The potential for significant impacts on soils, geology and the water environment as a result of the proposed development are considered in the EIA Report at Chapter 11. Good practice measures would be applied in relation to pollution risk, sediment management, peat management and management of surface runoff rates and volumes. This would form part of the Construction Environment Management Plan (CEMP) to be implemented for the proposed development and would be agreed prior to construction, an outline of which is provided in Technical Appendix 3.1: Outline Construction Environmental Management Plan.

275. The potential for the proposed development to effect fisheries has been carefully considered and there have been a number of meetings with representatives of the The Deveron, Bogie & Isla Rivers Charitable Trust & River Deveron District Salmon Fishery Board. It is understood that the mitigation put in place for the construction of Clashindarroch Wind Farm was successful. If consent is forthcoming it is anticipated that there would be a condition requiring similar construction mitigation which would be covered in the CEMP.

276. The EIA Report finds no significant effects on hydrology or the water environment. It finds no significant risk of flooding. These findings are subject to the implementation of mitigation measures which would be covered by a planning condition should consent be granted. The proposed development is therefore considered to be acceptable in terms of its effects on hydrology, the water environment and flood risk.

The Need for Conditions Relating to the Decommissioning of Developments (Criterion 17 of paragraph 169 of SPP)

277. It is anticipated that, should consent be forthcoming, the deemed planning permission would include a condition requiring the submission of a decommissioning method statement at a set time in advance of the decommissioning. The detailed method statement would:

- be implemented such that it "provides the most benefit or least damage to the environment as a whole, at acceptable cost, in the long term as well as in the short term" (RCEP, 1988). Results of the Best Practicable Environmental Option (BPEO) evaluation will inform whether the most benefit or least

damage will be achieved by completely removing all infrastructure or retaining some elements of some infrastructure. This would be agreed with Aberdeenshire prior to decommissioning;

- be consistent the final agreed HMP. This would serve to maintain the biodiversity and geodiversity of the Site. Furthermore, it would be consistent with any conditions required for flood relief or other nature conservation objectives;
- include full details of pollution prevention and control measures, and silt control measures that would be implemented during the decommissioning and reinstatement period to prevent impact on the water courses to avoiding adverse impacts to water quality;
- be in accordance with the National Planning Policy Framework and local planning policies in place at the time of writing; and
- aim to minimise the generation of waste and seek to re-use and recycle materials as much as possible, adhering to waste management licencing principles in place at the time of writing. Any waste that is generated during the decommissioning and restoration process would be removed from the Site and dealt with appropriately in line with best practice at the time of writing.

278. It is anticipated that pre-decommissioning surveys would be required to provide new baseline data on any potential environmental receptors such as protected species, other identified ecological receptors, hydrology, peatland, which may be potentially impacted during decommissioning. Prior to the planned commencement of decommissioning, consultation would be undertaken with statutory consultees, including SEPA and SNH regarding the requirements for the scope of pre-decommissioning surveys.

Opportunities for Energy Storage (Criterion 18 of paragraph 169 of SPP)

279. The proposed development does not include any opportunity for energy storage although consent may be applied for such a facility at a future time.

The Need for a Robust Planning Obligation to Ensure that Operators Achieve Site Restoration (Criterion 19 of paragraph 169 of SPP)

280. It is anticipated that should consent be forthcoming a condition requiring this would form part of the deemed planning permission.

SPP Conclusion

281. The proposed development would meet the principles set out in SPP (paragraph 29). They would assist in the delivery of the outcomes which are identified in SPP and are considered to be consistent with sustainable development. The proposed development is considered to satisfy the criteria which are set out at paragraph 169 of SPP. The proposed development is in an area which has the potential for wind farm development subject to the satisfaction of the relevant criteria. The relevant criteria have been considered and addressed through the EIA process. It has been concluded that, although there are a number of significant landscape and visual impacts as a result of the proposed development, these are considered acceptable when the proposed development is considered as a whole.

282. SPP also sets out a clear presumption in favour of development that contributes to sustainable development. Reference has been made to the application of the presumption in various Appeal cases and these are set out in this Planning Statement. It is submitted that weight should be attached to the meaningful contributions the proposed development would make to meeting sustainability targets.

283. The proposed development has been considered against the criteria set out in paragraph 169 of SPP. No

significant effects have been found as a result of the proposed development in respect of any of the criteria with the exception of landscape and visual. The significant landscape and visual effects have been found to be limited to approximately 7 km of the Site. These impacts are considered to be contained and localised. It is concluded in the LVIA that the landscape is capable of accommodating the proposed development.

284. It is concluded that, when the proposed development, the significant impacts which it would have and the benefits it would bring, are considered in the whole, is acceptable and should gain consent.

4.4 The Development Plan

285. In considering the context in which the proposed development should be assessed under S36 of the 1989 Act, the statutory Development Plan should be taken into account as a material consideration. It is important to note however, that Section 25 of the 1997 Act as amended, requiring that planning determinations are made in accordance with the Development Plan unless material considerations indicate otherwise, is not engaged in the case of S36 applications.

286. Section 24 of the 1997 Act, as amended, defines the Development Plan as a Strategic Development Plan (SDP), a Local Development Plan (LDP) and any supplementary guidance issued in connection with those plans.

287. The development plan for the site comprises:

- Aberdeen City and Shire Strategic Development Plan (SDP) 2014; and
- Aberdeenshire Local Development Plan (LDP) 2017.

288. In addition, there are number of supplementary guidance documents which are relevant to the proposed development as part of the emerging development plan. They are not part of the Development Plan and are considered later in this Section of this Planning Statement.

4.5 Aberdeen City and Shire Strategic Development Plan

289. The Aberdeen City and Shire Strategic Development Plan was adopted in March 2014. The following objectives are considered to be relevant to the proposed development:

- Economic Growth
- Sustainable Development and Climate Change
- Quality of Environment

290. The main objective outlined under the heading of Economic Growth is as follows:

> *"To provide opportunities which encourage economic development and create new employment in a range of areas that are both appropriate for and attractive to the needs of different industries, while at the same time improving the essential strategic infrastructure necessary to allow the economy to grow over the long term."*

291. This objective can be seen to be being furthered by the proposed development through direct and indirect employment opportunities, both during construction and whilst operational. Also, through the purchasing of local materials and services, as well as diversification of the region's energy infrastructure.

During construction the proposed development would require expenditure on site preparation, materials, components and labour. There would be approximately 84 people working onsite during an 18-month construction phase.

292. The main objective outlined under the heading of Sustainable Development and Climate Change is as follows:

> *"To be a city region which takes the lead in reducing the amount of carbon dioxide released into the air, adapts to the effects of climate change and limits the amount of non-renewable resources it uses."*

293. This is the objective in the Aberdeen City and Shire SDP which is most relevant to the proposed development. The proposal inherently furthers this objective as its entire purpose is to produce energy in a manner which produces no C02 emissions. It is expected that each wind turbine would be rated to between 4.0 and 6 MW giving a total installed capacity of between 56 MW and 80 MW. The proposed development would produce an average of between 183 GWh and 262 GWH of electricity annually (based on an average capacity factor of 37.5%). This equates to the power consumed by between 48,664 and 69,558 typical UK homes.

294. The main objective outlined under the heading of Quality of Environment is as follows:

> *"To make sure new development maintains and improves the region's important built, natural and cultural assets."*

295. The proposed development can further this objective through mitigating the negative effects of climate change on the region's natural environment. The proposed development is part of the move away from a fossil fuel orientated energy system to a renewable energy system, which is essential for sustainability and quality of the regions natural environment.

296. The layout of the proposed development is the outcome of an iterative design process which took into account important built, natural and cultural assets with the aim of avoiding significant impacts on all of these as far as possible.

4.6 Aberdeenshire Local Development Plan

297. The Aberdeenshire Local Development Plan (ALDP) was approved in April 2017. It is considered to be a relevant and up to date ALDP to which significant weight should be attached in the decision making process. The following policies are considered to be relevant to the proposed development:

- Policy P1 Layout, Siting and Design
- Policy P4 Hazardous and Potentially Polluting Developments and Contaminated Land
- Policy E1 Natural Heritage
- Policy E2 Landscape
- Policy HE1 Protecting Historic Buildings, Sites and Monuments
- Policy PR1 Protecting Important Resources
- Policy C2 Renewable Energy

298. This Section of the Planning Statement first considers the overarching spatial strategy and policy, then Policy C2 which is the main policy test for the proposed development and finally the remaining policies

relevant to the proposed development.

4.6.1 Vision and Spatial Strategy

299. Section 3 of the LDP sets out the following overarching Vision for the LDP area:

> *"an Aberdeenshire that is even more attractive, prosperous and sustainable, and which is an excellent place to live, visit and do business. The plan balances economic growth with the urgent challenges of sustainable development and climate change."*

300. The proposed development has the potential, through the net economic benefits set out in Section 2 of this Planning Statement and in the Technical report on Socio-economic Benefits, to work with the local community to help to make the area around Huntly a desirable place in which to live, work invest and visit over the lifetime of the proposed development and after the proposed development is decommissioned. It could result in a sustainable economy that has varied and plentiful employment opportunities in Huntly. It is a low carbon development which maximises the potential for renewable energy at the Site.

301. Section 3 of the LDP highlights:

> *"We have introduced new policies to encourage the development of renewable energy resources in a sensitive way." The proposed development would help in achieving the Plan vision with regards to subtle but effective harnessing of Aberdeenshire's renewable energy resources."*

302. Sustainable development is defined in Scottish Planning Policy (SPP) as being *"Development that meets the needs of the present without compromising the ability of future generations to meet their own needs."* The proposed development has the potential to provide sustainable development with the potential to help sustain the Huntly economy. It assists in meeting the current renewable energy targets (set out in Section 4.3.2 of this Planning Statement) and would not compromise the ability of the future generations to meet their own needs.

303. Section 2 of this Planning Statement and the Technical Report on Socio-economic Benefits sets out the ways in which net economic benefit could assist current and future generations. For the reasons provided in respect of Section 4.3.2 it is submitted that the proposed development is considered to be suitable for renewable energy and has due regard to relevant environmental, community and cumulative impacts.

304. In terms of the Spatial Strategy required to achieve the vision above, Section 4.0 of the LDP sets out the following:

> *"The Aberdeen City and Shire Strategic Development Plan defines two broad policy areas which we are taking forward in this plan. These are strategic growth areas and local growth and diversification areas. The strategic growth areas are centred on Aberdeen and the main public transport routes and are those areas where 75% of the anticipated growth in the city region will take place. Local growth and diversification areas are those areas where growth will be matched to local needs. We also identify the boundary between the accessible and less accessible area around the city (this is an "intermediate" area in the definitions contained in Scottish Planning Policy), the Energetica area, and regeneration priority areas where positive steps are needed to help these areas meet their full potential."*

305. The proposed development is considered to be sustainable as a set out in SPP. The Site is located in an area which has already been effected by commercial wind farm development and is not considered to be the most sensitive landscape in Aberdeenshire. The proposed development is considered to be high

quality and the net economic benefits could stimulate investment as set out in the objectives of the Community Partnership Strategy.

4.6.2 ALDP Policies

306. The ALDP contains a policy in respect of renewable energy development (C2), which contains reference to wind energy. This part of the Planning Statement first considers Policy C2 and then considers the other ALDP policies that are relevant to the proposed development and its location.

Policy C2: Renewable Energy

307. The most relevant policy to the proposed development is Policy C2: Renewable Energy, which states:

"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 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."

"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."

308. The proposed development is considered to be appropriately sited and the prosed design is considered to be right for the site.

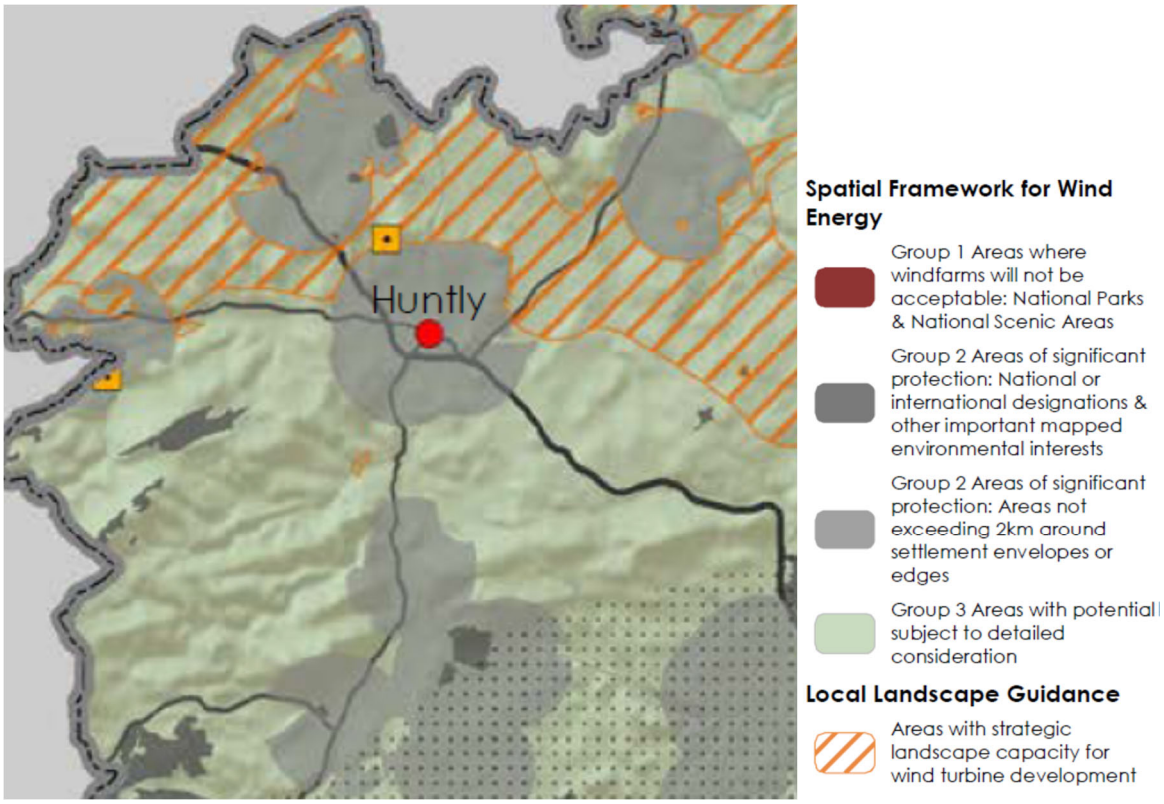
309. The spatial location is considered earlier in this Planning Statement in the context of SPP, table 1 and is not repeated here.

310. The matters which are raised in the final part of the policy are all covered in the context of paragraph 169 of SPP and are not repeated here. The proposed development is considered to be appropriately sited and has been designed to avoid unacceptable environmental effects, taking into account cumulative effects of existing and proposed turbines.

311. The proposed turbines would not compromise health and safety and subject to mitigation would not adversely affect aircraft or airfields or telecommunications. The proposed development would not have an unacceptable significant adverse effect on the amenity of dwellings or tourism and recreation interests.

312. The proposed development is considered to be in accordance with policy C2 of the ALDP.

313. The Climate Change plan, an extract pf which is provided shows that the Site is largely located within a Group 3 Area which has the potential for wind energy subject to detailed consideration.



Extract Climate Change Map

314. The issues that are raised in the other polices of the ALDP are all covered in the context of SPP paragraph 169 and are not repeated here.

315. It is concluded that the for the reasons set out in this section and in section 4.3.2 that the proposed development is in accordance with the ALDP.

4.6.3 Proposed Local Development Plan 2021

316. Preparation of a new Local Development Plan for Aberdeenshire is currently underway. A Main Issues Report was published on the 14th of January 2019 and a proposed Local Development Plan is currently being prepared. The Local Development Plan is expected to be adopted in 2021. No weight should be attached to this document at the current time.

4.6.4 Supplementary Guidance

317. There is no statutory supplementary guidance which is considered to be part of the adopted development plan which is relevant to the proposed development.

4.6.5 Planning Advice

318. The ALDP contains what are termed 'Planning Advice' documents. These documents do not have the same weight as Supplementary Guidance when it comes to the planning process, however are required to be given cognisance where relevant. The Planning Advice relevant to the proposed development is as follows:

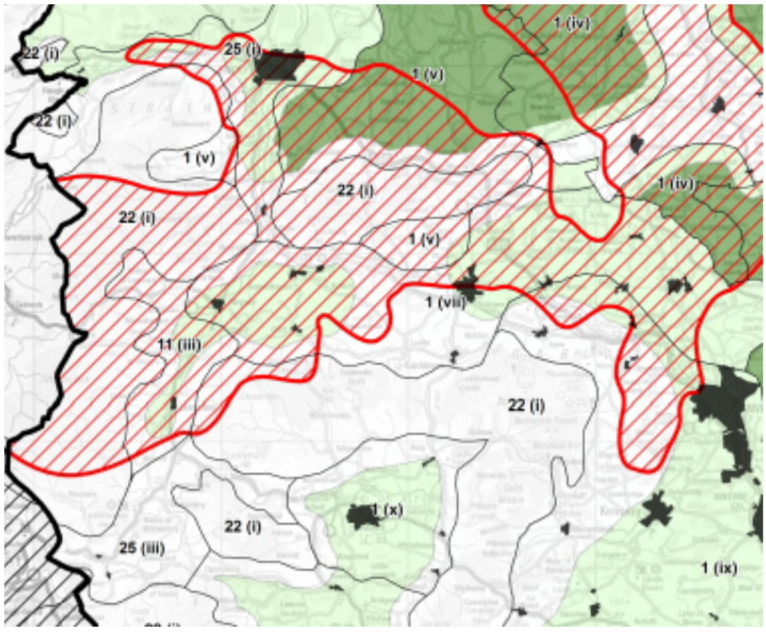
- Strategic Landscape Capacity for Wind Energy in Aberdeenshire (2014);
- Wind Turbine Development: Submission Guidance Note on the Information required for an Assessment of the Noise Impact of Proposed Wind Turbine Developments to be undertaken in Connection with a Planning Application; and
- Use of Wind Energy in Aberdeenshire: Part 1 - Guidance for Developers (2005).

The Strategic Landscape Capacity Assessment (SLCA) 2014

319. SLCA outlines the following four categories:

- Areas with significant underlying landscape capacity
- Areas with limited underlying landscape capacity
- Areas with no underlying landscape capacity
- Areas where capacity is limited by cumulative development

320. Figure A in the Strategic Landscape Capacity Assessment (SLCA) for wind turbines shows that the proposed development sits in an area identified as having limits on development, due to the cumulative impacts of wind farms.



Extract Figure A Wind Turbine Development Opportunities and Constraints SLCA

321. The SLCA states the following for areas where cumulative impacts limit further development:

> *"As described above, a number of landscape types and areas in Aberdeenshire have the underlying capacity to accommodate wind energy development. However, existing and consented development in or nearby some of these areas means that further significant development may exceed the acceptable cumulative capacity of the landscape. It is recommended that no further turbine development beyond a domestic scale (less than 15m in height) occurs in these areas.*

The areas where current cumulative impact limits capacity for further development are shown as hatched areas in Figure A. They are defined by:

1) The developed areas of windfarms and turbines (operational and consented) and the cumulative extent of their impacts on the surrounding landscape;

2) The underlying landscape capacity within the landscape areas and for those surrounding them;

3) The extent of area within which further significant development should be limited to avoid extending significant adverse cumulative landscape and visual impacts between the groups of turbines within the cumulative area and other turbines outside the area."

322. The SLCA advises that for areas where current cumulative impacts limit capacity for further development, there will be overlap with areas categorised as having 'significant underlying landscape capacity' and areas categorised as having 'limited underlying landscape capacity'. The following outlines the detail of these categories:

"Areas with Highest Underlying Capacity

These areas have the capacity to accommodate larger sizes of turbine and/or greater numbers and concentrations relative to other areas of landscape in Aberdeenshire. This is based on a combination of one or more factors including suitable landscape character, lower visual sensitivity or lower value. Not all of these factors are present in every area identified and the analysis and guidance in Chapter 6 should be followed.

Wind turbines are already located in many of these areas, utilising some of the underlying capacity and therefore reducing residual capacity. The limitations resulting from this are discussed below.

Areas with Limited Underlying Capacity

Most of the remaining lowland and coastal areas of Aberdeenshire have some underlying capacity for wind energy development but are generally not suited to larger turbines, large groupings or extensive concentrations of wind turbine development. Capacity varies from the ability to accommodate only very occasional small or small/medium wind turbines in some of the Coastal LCTs to more frequent medium turbines across some of the Straths and River Valley LCTs. Wind turbines are already located in some of these areas, utilising some of the available capacity and limiting development. The limitations resulting from this are discussed below. Guidance in Chapter 6 is intended to steer any future development in these areas to an acceptable level."

323. Landscape Capacity Studies are strategic in nature and should not be used to determine applications without regard to the individual assessment of the proposal. This has been made clear in several appeal and Section 36 decisions including Dersalloch Windfarm (Reference EC00003172) Larbrax Windfarm (Reference PPA-170-2105 October 2016), Sorbie Windfarm (Reference AIR-NAY-001 September 2015) and Kirk Hill Wind Farm (Reference PPA-370-2052, February 2017).

324. In the case of Dersalloch Wind Farm (Reference EC00003172) in South Ayrshire, the site partly borders East Ayrshire. The site is within an area identified in the South Ayrshire Landscape Wind Capacity Study as an area having no capacity for turbines of greater than 70m in height. Despite submissions from East Ayrshire Council that the proposal should be refused because there was no capacity for turbines of greater than 70m, the Scottish Ministers granted consent for 16 turbines of 125m to tip and 7 turbines of 115m to tip.

325. In the decision on Larbrax Windfarm (Reference PPA-170-2015 October 2016) the Reporter was clear, at paragraph 26, that although the relevant landscape capacity study (for Dumfries & Galloway and which formed part of the adopted Supplementary Guidance) indicated there was no capacity for a wind farm development on the scale proposed at the Site, it did not oblige the decision maker to refuse planning permission. Indeed, in that case the Reporter went on to uphold the appeal and grant planning permission.

326. In the case of Kirk Hill Wind Farm Reference PPA-370-2052, February 2017), the Reporter allowed the appeal despite the fact that the South Ayrshire Landscape Capacity Study did not consider there to be capacity for the proposed development.

327. In the Report to Scottish Ministers in relation to Sorbie Wind Farm, North Ayrshire (ReferenceAIR-NAY-001; September 2015), the Reporter states that "Landscape capacity studies can be useful tools in understanding the nature of impacts caused by wind turbines. However, I do not consider that it is appropriate to give them the attributes of detailed zonings of land for a particular number of turbines of a particular size." (paragraph 6.47) and that "it would be impossible for any landscape capacity study to be able to properly anticipate all the multiple impacts of the many factors that influence the design of a wind farm. I therefore consider that the Local Review Body were correct to attach more weight to a proposal specific landscape and visual impact assessment compared to the general conclusions contained in the Landscape Capacity Study" (paragraph 6.49).

328. Similar conclusions are reached regarding a consented site adjacent to the proposed Development by the Reporter at paragraph 8 in the Eascairt Windfarm Decision Notice (Ref PPA-130-2059) The Reporter advises that 'The Argyll and Bute Landscape Wind Energy Capacity Study of 2012 (LWECS) does not include more recent wind farm development. This document provides a strategic assessment, but must, in my view, be subject to an assessment of the actual impacts on the ground. I do not therefore consider that the study counts against the development proposed.'

329. It is clear from these decisions by Reporters and the Scottish Ministers that Landscape Capacity Studies should not be used as a basis for decisions on individual wind farm proposals. Rather the detailed site specific assessment should be used, and an assessment made of the relevant environmental and economic factors as part of the decision making process.

330. Whilst the proposed development is located in an area where current cumulative impacts limit capacity for further development, this does not mean that the development should be classed as unacceptable. Further considerations should be taken in to account.

331. This issue of landscape capacity has been covered in 4.3.2 in the context of SPP. It is concluded that the landscape has capacity for the proposed development.

Wind Turbine Development: Submission Guidance Note on the Information required for an Assessment of the Noise Impact of Proposed Wind Turbine Developments to be undertaken in Connection with a Planning Application

332. Chapter 14 of the EIA assess the potential operational noise levels associated with the proposed development, in line with this Planning Advice.

333. The assessments carried out in the EIA show that, for all receptors, noise levels due to the operation of the proposed development are predicted to be below 35dB LA90 across all assessed wind speeds. It is also shown that the calculated cumulative noise levels do not result in a significant increase of the consented daytime and night-time noise limits across the assessed wind speeds for both properties. The

calculated increase is 0.5dB or less in all cases and is therefore not considered to be significant in acoustic terms.

Use of Wind Energy in Aberdeenshire: Part 1 - Guidance for Developers (2005)

334. This guidance sets out how Aberdeenshire Council will assess the magnitude of effect as well as the sensitivity of the area in order to determine if the impact is significant.

335. The assessments carried out as part of the EIA take a similar approach to that outlined in this supplementary guidance. Chapters 7 to 18 of the EIA Report provide a determination on the significance of the impact that the proposed development would have on each specific environmental area of concern. The EIA Report for the proposed development highlights that no impacts have been assessed as being of high significance.

4.7 Development Plan Conclusion

336. The proposed development would have some limited significant landscape and visual and effects. The landscape impacts are to be expected as all commercial scale wind farms in Scotland have a significant impact in landscape terms. This is not a reason to refuse consent for commercial wind farms.

337. For the reasons provided in 4.3.2 of this Planning Statement it is considered that the proposed development is in accordance with the main policy test of the LDP, Policy C2. The other relevant policies have been considered and the proposed development is considered to be in accordance with those policies.

338. The proposed development is considered to be in accordance with the aims and objectives of the Development Plan. The proposed development is in accordance with the Development Plan when it is considered as a whole.

4.8 The Scottish Government Online Renewables Advice – Onshore Wind Turbines

339. Web based renewables planning advice was launched in February 2011 by the Scottish Government which replaced previous renewable energy advice provided in PAN 45. Online advice covers a range of renewable energy technologies and is intended to be updated on a regular basis.

340. Specific Advice Sheet: Onshore Wind Turbines was most recently updated in May 2014 and provides a checklist for planning authorities to ensure that they secure sufficient information to determine planning applications through the preparation of supplementary guidance.

341. The online advice also provides technical information relating to the component parts of a wind farm development and typical planning considerations in determining applications for onshore wind turbines. The issues raised in the online advice are addressed in the responses to policy set out above. They are not repeated here.

342. It is submitted that the online advice in respect of renewable technologies, and wind energy in particular, supports the principle of wind farm development and is therefore supportive of the proposed development subject to environmental considerations.

4.9 Historic Environment Scotland Policy Statement 2019 (HESPS)

343. The HESPS contains Scottish Ministers' policies and provides direction for Historic Environment Scotland and policy frameworks. HESPS is a policy statement directing decision-making that affects the historic environment. It is non-statutory, which means that it is not required to be followed as a matter of law or statute. It is relevant to a wide range of decision-making at national and local levels. It is a material consideration for planning proposals that might affect the historic environment.

344. HESPS sets out a number of policies and core principles which set out Historic Environment Scotland's understanding of how the historic environment should be managed and how to apply these principles. The principles contained in the document are the fundamental ideas that underpin desirable and positive outcomes for the historic environment. The principles are the basis for the policies outlined in the document and the policies describe how the principles should be implemented

345. The EIA Report Chapter 10 has been prepared with reference to HESPS and concludes that there are no direct effects and limited effects on the settings of any cultural heritage assets arising from the construction and operation of the proposed Development.

4.10 SNH - Spatial Planning for Onshore Wind Turbines – natural heritage considerations 2015

346. In June 2015, SNH published Spatial Planning for Onshore Wind Turbines – natural heritage considerations. This guidance document focuses on providing advice in developing spatial frameworks for wind energy developments. The guidance is aimed at planning authorities and, whilst the document does not set out any new policy positions or technical requirements for applicants, it does highlight the importance of natural heritage considerations and provides links to existing policy and guidance documents.

347. The design evolution process has had appropriate regard to natural heritage considerations. The proposed development is in an area which, in the context of SPP Table 1, and in the LDP has potential for wind farm development.

4.11 The Balance of Issues

348. When the issues set out in Section 4.2.3 are considered in the context of National Energy and Planning Policy and Local Planning Policy it becomes clear that the focus for any decision becomes a balance between the Landscape and Visual impacts of the proposed Development as the only significant unmitigable environmental effects against the potential benefits of the project. The proposed development is not located within a National Park or National Scenic Area and is, therefore, not in an area where wind turbines or other forms of renewable energy are unacceptable under the terms of SPP.

349. The Site is not nationally or internationally designated, nor is it within a nationally important mapped area for wild land. The proposed wind turbines would be beyond 2 km from the nearest settlement. The closest settlement is Huntly 6km away.

350. Significant landscape and visual effects are an expected part of any renewable energy development featuring wind turbines. The manner in which the proposed Development has been designed has sought to avoid significant effects on the most sensitive landscapes and viewpoints. The residual significant landscape and visual effects are commensurate with the scale and nature of the proposed Development and are considered to be acceptable.

351. It is considered likely that the proposed Development would generate in the region of between 183 – 262GWh per annum (annual energy production). The promotion of renewable energy, and its supply to the national grid, would contribute towards the aim of a low carbon economy set out clearly in National Policy.

352. The scale of the proposed turbines, at 180 m to tip w means that potential of the Site is being maximised to its full generation potential while carefully balancing the environmental impacts.

353. A project of this scale would create local economic benefits, particularly during construction where local businesses, trades, suppliers, construction firms and hoteliers would see increased trade. The Applicant is committed to offering the community the opportunity to invest in the proposed development. The potential economic benefits, associated with the proposed development as a result of the shared ownership process, offer valuable financial support to the community over and above the community benefits which would be made. The offer provides the community with the opportunity to invest in the future of the local area. The benefits could be used for long term investment in the local community.

354. Overall the proposed development would have beneficial economic impacts, which include local and community socio-economic benefits such as employment and associated business and supply chain opportunities. The potential economic benefits are considered to be substantial sums of money which are demonstrable and clearly linked to the proposed development.

355. It is submitted that the identified economic benefits would support the outcomes of National Policy on shared ownership. They have the potential to help the community become a successful, sustainable, naturally resilient and low carbon place.

356. SPP sets out a clear presumption in favour of development that contributes to sustainable economic development. Given the level of environmental effects expected from the development which have been carefully considered following design and mitigation, set against the positive outcomes which the proposed Development would demonstrably have, it is considered that the proposed Development would contribute significantly to sustainable economic development.

357. It is concluded that the proposed development gains considerable support from both planning and renewable energy policy.

5.0 Conclusions

358. This Planning Statement has considered renewable energy policy and has identified the renewable energy targets which have been set in Appendix 2. Appendix 2 identifies where Scotland is positioned in respect of meeting existing renewable energy targets. Global climate change is widely recognised as one of the greatest environmental, social and political challenges facing the world today and has been recently declared as a climate 'crisis' or 'emergency'. The proposed Development would make a meaningful contribution to the Scottish Government's uncapped target of generating the equivalent of 100% of electricity demand from renewable sources beyond 2020. While the UK Government is clear that they expect the generation of renewable energy to become more self-sufficient, Scotland continues to support the existing framework to meet ambitious targets. The viability of sites is critical to the ability to meet targets. The design process has sought to maximise the viability of the proposed Development. It has carefully considered the scale of the turbines in order to maximise the generating capacity of the proposed Development within the technical and environmental constraints that exist on the site and in the surrounding area.

359. There is a clear need to intensify the drive for renewable development production and onshore renewable energy plays an important part of meeting the renewable energy targets. Developments such as the proposed development, which are considered to be environmentally acceptable and maximise the potential opportunity of a site, need to be consented.

360. The UK Government's objective to cut carbon emissions (at a low cost) combined with the Scottish Government's ambitious targets mean that large onshore wind sites with good wind resource, which are well located in terms of infrastructure, including grid connection, along with limited significant environmental impacts, should be developed. The proposed Development fulfils these requirements with an estimated carbon saving of as follows:

- 7,757 tonnes of CO_2 per year over coal-fired electricity (232,709 million tonnes assuming a 30 year lifetime for the purposes of the carbon calculator);
- 2,138 tonnes of CO_2 per year over grid-mix of electricity (64,142 million tonnes assuming a 30 year lifetime for the purposes of the carbon calculator); or
- 3, 794 tonnes of CO_2 per year over a fossil fuel mix of electricity (113,825 million tonnes assuming a 30 year lifetime for the purposes of the carbon calculator).

361. The proposed Development is located in a site which is considered to be suitable for windfarm development in the context of Table 1 of SPP.

5.1 Benefits of the Proposed Development

362. The benefits of the proposed Development can be summarised as follows:

5.1.1 Energy Policy and Relevant Targets

363. The benefits of the proposed development in respect of its contribution to Energy Policy and relevant targets, as well as the expected energy generation potential of the Site are set out in Chapter 3 of this Planning Statement.

364. It is anticipated that the proposed development would provide a valuable contribution to renewable

energy and decarbonisation targets with a total installed capacity of around 134 MW and (based on currently available technologies and assuming the same supplier for all turbine positions). This means that the proposed development would produce between 360-380 GWh of electricity annually (based on site derived capacity factors of 35.8 %). This equates to the power consumed by approximately 99,200 homes.

5.1.2 Economic Impacts

365. The total economic value of the renewables industry within Abderdeenshire is not known, but some data are available for the southwest Scotland region. One of the most recent studies, which was undertaken in 2018 by independent renewable energy analysts, BVG Associates looked at economic benefits created by eight ScottishPower Renewables onshore windfarms in south west Scotland commissioned between 2016 and 2017. The windfarms have a combined capacity of 474MW and would have a £1.6 billion lifetime investment, 66% of this would be in the UK. The study showed that, for these windfarms alone, investment in the local area amounted to £257 million, in addition to which the schemes generated £297 million GVA and created 7,768 local full time equivalent (FTE) jobs. Other economic benefits include direct payment to community benefit schemes amounting to over £59 million over the 25 year lifetime of the windfarms.

366. Chapter 16 of the EIA Report advises that proposed development expenditure during the construction phase is estimated to be approximately £52.64 million and there is expected to be a peak workforce of 84. The Scottish economy would benefit by some £12 million net GVA during construction. During the operational phase, based on a 25-30 year period, the proposed development would contribute some £3.04 million in GVA to the Aberdeenshire and Moray economy through direct, indirect and multiplier effects, and over £14.40 million to the economy of Scotland as a whole. This is considered to be a positive benefit of the proposed development.

5.1.3 Community Shared Ownership Impacts

367. As stated in Chapter 2 of this Planning Statement, as an integral part of the proposed development the Applicant is offering the community the opportunity to invest in the proposed development.

368. Given recognised economic uncertainty associated with onshore wind, Scottish Energy Strategy 2017 and OWPS (See Appendix 2) it is difficult to predict the net economic impact of the shared ownership offering from the proposed development. However, it is recognised that it has the potential to make a valuable contribution to the local economy generally.

5.1.4 Community Benefit Impact

369. If consented, a Community Benefit Fund would be made available to communities in the region of the Site in addition to the community benefit funding to Aberdeenshire communities that Clashindarroch Wind Farm Limited has contributed to date through existing windfarm projects. The potential that this could create in the form of investment and match funding should be recognised and considered as valuable.

5.1.5 Other Benefits

370. In addition to the economic benefits of the proposed development set out above the proposals include for:

- a carbon payback period of 1.2-1.4 years for the proposed development; (assumes 5,.5 MW turbines and

a 30 year life time;

- 7,757 tonnes of CO_2 per year over coal-fired electricity (232,709 million tonnes assuming a 30 year lifetime for the purposes of the carbon calculator);
- the project makes efficient use of existing land and infrastructure such as tracks which limits the amount of new track required to facilitate the proposed development; and
- improves access tracks which could be used under the right to roam.

5.2 Residual Environmental Effects

371. This Section is supported by Section 4.3.2. which sets out a detailed consideration of the environmental effects of the proposed development on a topic by topic basis, based on the criteria set out in Paragraph 169 of SPP 2014.

372. The scoping and consultation effort alongside further survey work highlighted some key issues which would require careful consideration including:

- the positioning of turbines with respect to ecological constraints;
- the positioning of turbines with respect to peat deposits onsite;
- the positioning of turbines with respect to the closest properties to the Site;
- the potential for cumulative effects;
- the composition of turbines in views from key viewpoints; and
- the manner in which the turbines would be accommodated in and respect the landscape into which they would be placed.

373. These issues have been carefully considered alongside technical and economic matters including:

- spacing turbines appropriate to the swept rotor area so they would capture the wind efficiently as an array,
- the size of turbines and energy generation potential to make an economic Site;
- the need to create cost efficient road access to turbine positions; and
- the manner in which to treat forestry onsite to minimise felling requirements for the proposed development.

374. Environmental and technical factors as well as advice from consultees and members of the public continually fed into the design process. Taking all these main issues into account a final design for the proposed development was agreed which could be subject to final EIA.

375. The EIA considered the effects of the proposed development on a topic by topic basis. Its purpose was designed to expose the potential for significant environmental effects from the proposed development and thereby understand the need for mitigation, where required or possible, concluding with an understanding of what residual effects would be. The conclusions of the EIA are presented by independent consultants in the EIA Report which accompanies the application. The findings in the EIA Report identify the required mitigation as integral to the proposed development. The findings of the EIA Report are set out in brief in Table 5.1 which summarises the findings of the EIA Report.

Table 5-1
Summary of Environmental Effects

Topic	Summary of Mitigation	Residual Environmental Effect
Landscape	• Design	Limited significant effects
Visual	• Design	Limited significant effects
Ecology	• Design • Pre-Construction Surveys • Construction Environmental Management Plan • Species Protection Plan • Habitat Management Plan	Not significant
Ornithology	• Design • Pre-Construction Surveys • Construction Environmental Management Plan •	Not significant
Soils, Geology and the Water Environment	• Design • Water quality monitoring • Construction Environmental Management Plan • Construction Methodology Statement (CMS) • Pollution Prevention Plan (PPP) (including monitoring, as appropriate); • Site Waste Management Plan (SWMP); and • Water Management Plan (WMP).	Not significant
Forestry	• Compensatory Planting	Not significant
Cultural Heritage and Archaeology	• Design •	Not significant
Noise and Vibration	• Design • Construction Environmental Management Plan • Conditions covering operational noise	Not significant
Site Access, Traffic and Transport	• Construction Environmental Management Plan • Construction Traffic Management Plan	Not significant
Socio-economic, Tourism and Recreation	• None	Not significant
Aviation	• Use of aviation lighting for CAA • Technical radar solutions	Not significant
Other Environmental Issues	• Design • Construction Environmental Management Plan	Not significant

376. The EIA Report sets out a number of mitigation measures, including embedded mitigation as part of the design process and the inclusion of a CEMP, should consent be forthcoming. As a result, the proposed development would not result in any significant adverse effects on biodiversity, traffic and transportation, aviation and defence, noise and residential amenity. In addition to this there is the potential for economic benefits to arise as a result of the proposed development.

377. The proposed development has the potential to make a valuable contribution to the targets that have been set by the Scottish Government for the production of renewable energy and reduction of carbon emissions. The proposed development would also make valuable community and socio-economic benefits which are described in this Planning Statement.

378. The national planning policy is supportive of the proposed development. The proposed development is considered to be acceptable when assessed against the criteria set out in SPP at paragraph 169. In the context of the ALDP it is concluded that the proposed development is acceptable. In reaching this conclusion regard has been had to the potential for significant effects on the identified criteria. The proposed development is considered to be in accordance with the Development Plan.

379. The proposed development has addressed the criteria set out in Schedule 9 of the 1989 Act taking into account other policy considerations including the relevant Development Plan. On this basis, it is requested that the S.36 consent is granted and deemed planning permission is forthcoming in order that the benefits identified in this Planning Statement can be delivered.

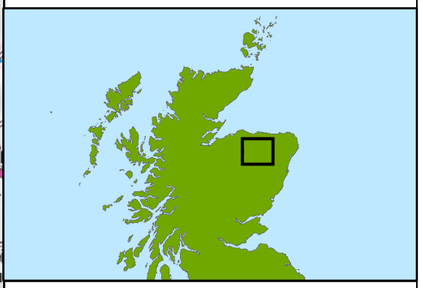
FIGURES

330000 340000 350000 360000 370000

850000 840000 830000 820000

Legend

Site Boundary



VATTENFALL

SLR

4/5 LOCHSIDE VIEW
EDINBURGH PARK
EDINBURGH
EH12 9DH

T: +44 (0)131 335 6830
www.slrconsulting.com

1:150,000 @ A3

0 1.25 2.5 5 Km

N

Clashindarroch II Wind Farm

Planning Statement

Location Plan

Figure 1

Date November 2019	Prepared By: WR
Ref: CLON_1_Location_Plan_191119wr	

342000 345000 348000 351000

840000 837000 834000 831000

Legend

Planning Application Boundary

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1:40,000 @ A3

0 0.25 0.5 1 Km

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Clashindarroch II Wind Farm

Planning Statement

Application Boundary

Figure 2

Date: November 2019 | Prepared By: WR

Ref: CLON_2_Application Boundary_191119wr

342000 345000 348000 351000

840000

837000

834000

831000

Service Layer Credits: Source: Esri, DigitalGlobe, GeoEye, Earthstar Geographics, CNES/Airbus DS, USDA, USGS, AeroGRID, IGN, and the GIS User Community

342000 345000 348000 351000

Legend

Site Boundary

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0 0.25 0.5 1 Km

Clashindarroch II Wind Farm

Planning Statement

Site Aerial Photography

Figure 3

Date: November 2019 | Prepared By: WR

Ref: CLON_3_Site Aerial Photography_191119wr

342000 344000 346000 348000 350000

838000 836000 834000 832000

Legend

- Site Boundary
- Proposed Turbine Locations
- Proposed Met Mast Location
- Proposed Access Track
- Alternative Access Track
- Existing Access Track
- Existing Substation
- Proposed Substation
- Proposed Laydown Area
- Temporary Construction Compound
- Existing Borrow Pit
- Proposed Borrow Pit Search Area
- Proposed Crane Hardstanding
- Existing Water Crossing
- Existing Water Crossing with Additional Works
- New Water Crossing
- Watercourse
- 50m Buffer from Watercourse

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0 0.25 0.5 1 Km

N

Clashindarroch II Wind Farm

Planning Statement

Site Layout

Figure 4

Date: November 2019 | Prepared By: WR

Ref: CLON_4_Site Layout_191119wr

APPENDIX 1

Schedule 9 of the Electricity Act 1989

Appendix 1: Schedule 9 of the Electricity Act 1989

1. In the consideration of the application the Scottish Ministers have a duty to fulfil the requirements of Schedule 9 (paragraph 3) of the 1989 Act. Schedule 9 considers the preservation of amenity and sets out a number of environmental matters which must be considered by the decision maker. Schedule 9 states:

(1) "In formulating any relevant proposals, a licence holder or a person authorised by exemption to generate, transmit, distribute or supply electricity

(a) shall have regard to 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; and

(b) shall 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.

(2) In considering any relevant proposals for which his consent is required under section 36 or 37 of this Act, the Secretary of State shall have regard to—

(a) the desirability of the matters mentioned in paragraph (a) of sub-paragraph (1) above;

(b) the extent to which the person by whom the proposals were formulated has complied with his duty under paragraph (b) of that sub-paragraph.

(3) Without prejudice to sub-paragraphs (1) and (2) above, in exercising any relevant functions each of the following, namely, a licence holder, a person authorised by an exemption to generate or supply electricity and the Secretary of State shall avoid, so far as possible, causing injuries to fisheries or to the stock of fish in any waters."

2. In the Fauch Hill / Harburnhead S36 decision (Reference EC00003184 and EC00003190 respectively, July 2014), the Reporters considered Schedule 9 of the 1989 Act and advised that:

"The provisions of Schedule 9 of the Electricity Act 1989 apply to the assessment of wind farms with an installed capacity of over 50MW. The Scottish Government's position is that whether an applicant is licensed or not, Ministers will have regard to the Schedule 9 provisions and expect them to be addressed through the Environmental Statement."

3. The High Court (England and Wales), in 2012, made clear in the decision of R (on the application of Samuel Smith Old Brewery) v Secretary of State for Energy & Climate Change that the provisions of section 38(6) (of the Planning and Compulsory Purchase Act 2004)[6] which requires that planning determinations should be made in accordance with the Development Plan unless material considerations indicate otherwise, does not apply in respect of a direction under section 90 (of the Town & Country Planning Act 1990)[7]. This decision related to a 'direction' in connection with an application for section 37 consent under the 1989 Act.

[6] Section.38(6) of the Planning and Compulsory Purchase Act 2004 is equivalent of section 25 of the 1997 Act in Scotland.
[7] Section 90 of the Town & Country Planning Act 1990 is equivalent to section 57 (2) of the 1997 Act

4. The judgement advised that a *"direction"* that planning permission shall be deemed to be granted was not a *"determination"* under the Planning Acts. The Court stated (para 75) that *"as a matter of construction I consider that it is a direction that such a determination is not required".* It was therefore judged that there was no duty on the decision maker in making a direction under section 90 (of the Town & Country Planning Act 1990) to comply with the requirement in section 38(6) (of the Planning and Compulsory Purchase Act 2004) that determinations must be made in accordance with the Development Plan unless material considerations indicate otherwise.

5. In Scotland the matter was considered in the William Grant / Dorenell s.36 Wind Farm Judicial Review case (2012). In this case Lord Malcolm ruled that s.25 of the 1997 Act did not apply to a 1989 Act case. He advised that his decision was broadly in line with the Samuel Smith old Brewery Case In respect of Schedule 9 of the 1989 Act Lord Malcom stated:

"I consider that Parliament intended that the relevant provisions of the 1989 Act would provide a self-contained code…….Schedule 9 narrates the relevant considerations, dealing with, amongst other things, the preservation of amenity……By contrast, section 25 [s.38(6) in England] applies to decisions under the planning acts when it is a requirement that regard is to be had to the development plan".

6. It is therefore considered that there is no 'primacy' of the Development Plan in the case of application made under section 36 of the 1989 Act. This was made clear in the Reporter's Report in respect of Harestanes Windfarm (Reference IEC/3/77 May 2007). The findings of fact stated:

"Schedule 9 of the Electricity Act 1989 identifies a number of matters – concerning natural and built heritage and fisheries – to which regard must be had in considering an application under section 36 of the Electricity Act. However these are not the only relevant matters in this case. Others include: energy policy; the development plan and other planning policy guidance; the environmental effects of the proposal; and the views of consultees and other parties."

7. In the Fauch Hill/Harburn Head S36 Decision (Reference EC00003184 and EC00003190 respectively July 2014) the Reporters found that:

"There was general agreement that section 25 of the Town and Country Planning (Scotland) Act 1997 was not engaged in a section 36 Electricity Act application. Nonetheless, there was also agreement that this did not mean that the development plan was irrelevant, not least because it contained policies relating to many of the environmental features listed in Schedule 9. There was also general agreement that the Scottish Government energy policy is a further important consideration."

"We consider the basis of our decision is the consideration of the impact on the environmental features listed in Schedule 9, the policies of the development plan and other relevant practical considerations (such as the impact on aviation radar) bearing in mind the context set by the Scottish Government energy policy."

APPENDIX 2

Renewable Energy Policy

Appendix 2: Renewable Energy Policy

Introduction

In order to understand the context within which the proposed development is being promoted, it is considered important that international, national (UK) and Scottish Government commitments to the development of renewable energy technology and approach to climate change are understood. Renewable energy policy and associated targets are important material considerations to the determination of the planning application. The Renewable energy policy in respect of the proposed development is set out in Appendix 2 of this document.

International Context

In order to understand the need for renewable energy generation in the 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. The international context is well understood and is summarised here.

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 194 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 was obliged to secure an 8% reduction in greenhouse gas emissions from 1990 levels by 2012.

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

The twenty-first session of the Conference of the Parties (COP 21), 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.

The twenty-second session of the Conference of the Parties (COP 22), the twelfth session of the Conference of the Parties (serving as the meeting of the Parties to the Kyoto Protocol (CMP 12)), and the first session of the Conference of the Parties serving as the meeting of the Parties to the Paris Agreement (CMA 1) were held in Morocco in November 2016. The Conference successfully demonstrated to the world that the implementation of the Paris Agreement is underway and the constructive spirit of multilateral cooperation on climate change continues. The 23rd Conference of the Parties to the United Nations Framework Convention on Climate Change (COP 23) took place in Bonn from 6 to 17 November 2017. The Conference produced new climate action initiatives, commitments and partnerships, the announced actions cover many of the areas covered by the Sustainable Development Goals including energy, water, agriculture, oceans and coastal areas, human settlements, transportation, industry, and forests. Climate finance and climate resilience were also at the centre of the discussions at the conference.

European Context

In January 2008 the European Commission published a package of 20-20-20 targets. This included proposals to:

- reduce the EU's greenhouse gas emissions to at least 20% below 1990 levels;

- increase the proportion of final EU energy consumption from renewable sources to 20%; and
- a reduction in primary energy use by 20% compared with projected levels, which is to be achieved by improving energy efficiency.

These targets are set out in the EU Renewable Energy Directive (March 2009) and are to be achieved by 2020. The 20% target is split between Member States. For the UK, the EC's obligations include a 16% reduction in UK greenhouse gas emissions by 2020, against 1990 levels, and for 15% of all energy consumed in the UK to be produced by renewable sources by 2020.

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.

In January 2014 the European Commission presented 'A 2030 Framework for Climate and Energy Policies' 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

The main responsibilities for policy development in relation to energy production and regulation in Scotland are reserved by Westminster. The following summarises 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.

The Climate Change Act 2008

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

Two key aims underpin the 2008 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.

The 2008 Act introduced for the first time a legally binding framework to tackle the challenges of climate change. The 2008 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 for meeting the challenge of reducing carbon emissions and the fight against climate change.

The UK Renewable Energy Strategy 2009

The requirement for delivery and monitoring, contained in the EU Directive March 2009, is reflected in the Executive Summary at paragraph 2.3 of the UK Renewable Energy Strategy (published in July 2009) (UKRES). It advises that the Commission has set indicative interim targets for the delivery of renewable energy to 2020. The summary advises that the first interim target, for the years 2011-2012, will be most challenging to meet, due to the time required to plan, finance and build renewable energy infrastructure. This interim target was to achieve

4% share for renewables in the energy mix.

National Renewable Energy Action Plan

The National Renewable Energy Action Plan for the UK was published in July 2010 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

The 2050 Pathways Analysis (published July 2010 by Business Energy Infrastructure and Strategy Department) presents a framework through which to consider some of the trade-offs and choices that 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.

The UK Renewable Energy Roadmap (UKRER)

The UK Renewable Energy Roadmap (published July 2011) 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.

The UK Renewable Energy Roadmap Update 2013 (published November 2013) advised that, since the first UK Roadmap, the UK was at that time 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 noted that the UK Government projections of energy consumption in 2020 had 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) had also been revised downwards in line with this projection of energy consumption.

UK Carbon Plan

The UK Carbon Plan (published December 2011) sets out how the UK Government proposes to tackle climate change and build a green economy through specific, practical action across government, with clear targets and milestones. 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. The Plan set a target to generate 31% of final electricity demand from renewables by the end of 2011.

The Fifth Carbon Budget

In November 2015, the Committee on Climate Change (CCC) advised the UK Government to set the fifth carbon budget (as required by the 2008 Act) to reduce UK greenhouse gas emissions in 2030 by 57% relative to 1990 levels; that advice was accepted in June 2016. At that time provisional figures showed that in 2015 UK emissions were 38% below 1990 levels (Source CCC).

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

At the UK level there remains a clear commitment to reducing carbon emissions and seeking to address the impacts of climate change alongside support for renewable energy.

Reducing Emissions and Preparing for Climate Change 2017 Progress Report to Parliament

Reducing Emissions and preparing for Climate Change 2017 Progress Report to Parliament (June 2017) is the most recent report to Parliament on progress in reducing emissions to meet carbon targets, as required under the 2008 Act.

The foreword to the Summary and Recommendations section of the report advises that this is an important moment for action to tackle climate change. Since the passage of the Climate Change Act in 2008, the UK has reduced energy bills and delivered more than a three-fold increase in renewable electricity generation. UK Greenhouse gas emissions have fallen by 42% since 1990, whilst the UK economy has still managed to grow its Gross Domestic Product (GDP) by over 65%. However, the UK's progress in meeting the UK commitments on climate change is at risk of stalling, just when UK businesses and households are poised to see a growing benefit, such as cleaner air and improved health, from climate change action.

The report states that Climate Change is happening, not waiting, and that it is neither justifiable nor wise to delay action to address it further. Strong steps and clear signposts are needed to keep the UK on track and to support international action, including the creation of two new parliamentary plans. These two plans are now overdue but are in fact required by law (the 2008 Act): one plan to further reduce the UK's greenhouse gas emissions; and one to improve the UK's resilience to climate change.

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

Net Zero: The UKs Contribution to stopping global warning was published by the Committee on Climate Change (CCC) in May 2019. It was prepared at the request of the devolved governments of Scotland and Wales and also the UK Government, to reassess the UK's long-term emissions targets.

The advice to the Scottish Government from the CCC, as highlighted in Section 4.2, relates to this report: Net Zero – The UK's contribution to stopping global warming (2019). The recommendations of this report, relating to Scotland, have been taken forward in the amendments to the Climate Change Bill and are summarised as follows:

- The UK should legislate as soon as possible to reach net-zero greenhouse gas emissions by 2050. The target can be legislated as a 100% reduction in greenhouse gases (GHGs) from 1990 and should cover all sectors of the economy, including international aviation and shipping;
- The aim should be to meet the target through UK domestic effort, without relying on international carbon units (or 'credits');
- This target is only credible if policy to reduce emissions ramps up significantly;
- HM Treasury should undertake a review of how the transition will be funded and where the costs will fall. It should develop a strategy to ensure this is, and is perceived to be, fair; and
- Scotland has proportionately greater potential for emissions removal than the UK overall and can credibly adopt a more ambitious target. It should aim for net-zero GHGs by 2045. Interim targets should be set for Scottish emissions reductions (relative to 1990) of 70% by 2030 and 90% by 2040.

The Net Zero report also has a number of related documents which go into detail on how the targets of the Next Zero report can be met. One such related document is the 'Green Finance Strategy'.

Green Finance Strategy

The Green Finance Strategy (GFS) was published in July 2019 by HM Treasury and provides detail on how the way the UK invest needs to change so that all countries within the UK and all industry sectors can deliver emissions reductions.

The GFS refers to the promotion of low carbon growth, at home and abroad, through various means. It also highlights that the transition from the present situation to a resilient and environmentally sustainable economy will necessitate "the reallocation of tens of trillions of pounds of capital, presenting significant opportunities for the UK's financial sector". The GFS also acknowledges the key role that the UK's financial regulators (The Bank of England, The Financial Conduct Authority, The Financial Reporting Council and The Pensions Regulator) play in facilitating this transition.

The GFS details that the decarbonisation of the UK economy requires substantial levels of investment in resilient low carbon infrastructure. Creating huge opportunities for UK business and financial institutions.

The key approaches put forward by the GFS in order to increase the flow of green finance are as follows:

- Establish robust, long-term policy frameworks;
- Improve access to finance for green investment;
- Address market barriers and build capability; and
- Develop innovative approaches and new ways of working.

The GFS details that the government is carrying out an Infrastructure Finance Review to explores how it can ensure that good infrastructure projects can raise the finance they need, in the light of such things as technological change.

The report reiterates that the government will look to move forward with the approaches outlined in in this section and will work closely with the private sector to deliver the Green Finance Strategy.

Scottish Renewable Energy Context

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. As of May 2011, the target was 100% of gross annual electricity consumption by 2020.

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 following text identifies key Scottish Government renewable energy targets and policy that are relevant at the current time.

The Climate Change (Scotland) Act 2009

The Climate Change (Scotland) Act 2009 (the 2009 Act) received Royal Assent on August 4, 2009, the Bill having

been passed unanimously by members of the Scottish Parliament. The 2009 Act is a key commitment of the Scottish Government and was defined as the most far-reaching environmental legislation considered by the Parliament during the first ten years of devolution. There were a number of parts to the 2009 Act which set the context for the setting of targets and the monitoring of deliverables to achieve those targets. These are described as follows:

- Part 1 created the statutory framework for greenhouse gas emissions reductions in Scotland by setting an interim 42% reduction target for 2020, with the power for this to be varied based on expert advice, and an 80% reduction target for 2050. To help ensure the delivery of these targets, the 2009 Act required the Scottish Ministers to set annual targets, in secondary legislation, for Scottish emissions between 2010 and 2050;
- Part 2 contained provisions to allow the Scottish Ministers to establish a Scottish Committee on Climate Change;
- Part 3 placed a duty on the Scottish Ministers requiring that they report regularly to the Scottish Parliament on Scotland's emissions and on the progress being made towards meeting the emissions reduction targets set in the 2009 Act; and
- Part 4 contained the ability to impose further duties on public bodies in relation to climate change.

Climate Change Delivery Plan: Meeting Scotland's Statutory Climate Change Targets 2009

In the Climate Change Delivery Plan: Meeting Scotland's Statutory Climate Change Targets 2009 the Scottish Government set 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 been steadily increased since it was first introduced and is now 100%. There is currently a substantial shortfall against this target, further information is provided in Section 8 of this Planning Statement. It is acknowledged that the proposed development would not directly assist in meeting the 2020 targets owing to the timescales for its development. However, given that, if consented, it could achieve grid connection in 2023 it would start commercial operation in the first quarter of 2023 and would contribute to the anticipated shortfall in achieving the 2020 target.

The 2020 Renewable Routemap for Scotland Update 2011

The 2020 Routemap for Renewable Energy was published in June 2011 and updates and extends the Scottish Renewable Action Plan 2009. This document sets out a Scottish Government target to meet an equivalent of 100% demand for electricity from renewable energy by 2020. The 2020 Routemap also makes a commitment to achieve at least 30% overall energy demand (heat and transport as well as electricity) from renewable sources by 2020.

Section 2.3.4 of the 2020 Routemap identifies that in order to meet the 2020 target for 100% of electricity demand from renewables, a further increase in consenting and deployment rates will be required.

Given the proven status of the technology, and the known and anticipated quantity of applications in the system, the Routemap notes that onshore wind is expected to provide the majority of capacity in the timeframe of the 2020 renewable electricity targets. Key actions relate to providing a supportive planning system which provides clear spatial and policy direction, continues to engage local communities, and balances the need to protect the environment alongside the need to continue to make progress to renewable energy targets (page 72).

Electricity Generation Policy Statement (EGPS) 2013

The Scottish Government published the Electricity Generation Policy Statement (EGPS) in 2013. 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.

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".

The 2020 Renewable Routemap for Scotland Update 2013

The 2020 Renewable Routemap for Scotland Update 2013 was issued in December 2013. This document advises on the progress that has been made to date in the renewable energy sector and identifies what requires to be progressed and the ways in which the requirements are being addressed.

The Ministerial Forward states that:

"Renewable energy is a central element of a strategy for a successful Scotland. Scotland's vast renewable energy resources create major job and investment opportunities and – as part of wider common balanced energy mix – will deliver secure, low carbon and cost effective energy supplies" (page 3)

Reducing Emissions in Scotland 2015 (2015 Report)

The fourth 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 March 2015 by the Committee on Climate Change. The 2015 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.

The 2015 Report suggests that the Scottish Government should continue to investigate additional opportunities to reduce emissions that go beyond current policies. The 2015 Report advises that the Climate Change Committee proposes to agree a process and timeline with the Scottish Government to advise on the implications of improved inventory data that is expected later in 2015 and again in 2017.

The 2020 Renewable Routemap for Scotland Update 2015

In September 2015, the Scottish Government published the 2020 Routemap for Renewable Energy in Scotland Update 2015. The foreword of this document advises that provisional figures show that renewable sources generated 49.8% of gross electricity consumption in 2014. While this suggests that Scotland was on target to meet the interim target of 50% by 2015 it is clear that Scotland should not underestimate the challenge of meeting the 2020 target of 100% renewable generation.

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.

The document identified the potential for energy storage to enable the integration of renewables into the grid,

and balance supply and demand thus enhancing the security of supply.

The Chief Planner Letter to All Heads of Planning (November 2015)

A letter from the Scottish Government Planning and Architecture Division to all Heads of Planning entitled 'Energy Targets and Scottish Planning Policy' was published on 11 November 2015.

It sets out that despite changes to UK renewable energy policy, the Scottish Government's policy remained unchanged and that it *"supports new onshore renewable energy developments, including onshore wind farms and particularly community owned and shared ownership schemes". It also made it clear that "this policy support continues in the situation where renewable energy targets have been reached".*

The letter reminded the Heads of Planning that the target of 100% of gross electricity consumption from renewables by 2020 is a statement of intent and that it is known that Scotland has the potential resource to deliver and exceed the target. It clearly states that there is not a cap on the support for renewable energy developments, including onshore wind, once the target has been reached.

Energy in Scotland 2016

Energy in Scotland 2016 has in many respects been updated by Energy in Scotland 2017. However, it considers the matter of storage which is not repeated in the 2017 document. Page 27 of the document states:

"With the increased deployment of renewables and the decarbonisation of heat and transport, energy storage technologies- alongside other flexibility options such as demand side response, active network management and interconnectors – could greatly improve the flexibility, security, sustainability, and affordability of Scotland's energy system."

It goes on to advise that the role at all scales of energy storage will be an important consideration in the Scottish Government's strategy to support the next stage in the energy transition for Scotland.

Consultation on Proposals for a New Climate Change Bill (Scotland) June 2017

The Scottish Government intends to introduce a new Climate Change Bill 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.

Proposals for a new Bill were outlined by the Cabinet Secretary for Environment, Climate Change and Land Reform, Roseanna Cunningham, in a statement to Parliament in June 2017. A consultation on these proposals ended in September 2017.

Reducing Emissions in Scotland 2017

The sixth 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 2017 by the Committee on Climate Change. The 2017 Report assessed latest emission targets and 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.

The report concluded that Scotland has performed well and that the annual legislated target for 2015 was met, the second annual target to be achieved. The 2015 target for net emissions is 45.928 MtCO2e. Net Scottish emissions were 45.5 MtCO2e in 2015, i.e. below the annual target. Emissions on the net basis in 2015 were 41% below 1990 levels. The report anticipates Scotland is on track to meet the interim target for at least a 42% reduction in net emissions by 2020.

The report suggests that in order to meet Scotland's ambitious target, more needs to be done in sectors other than power, especially in sectors such as transport, agriculture and heat for non-residential buildings in which little progress is currently being made. Otherwise, Scotland's ambitious targets will be at risk. There have not been significant emission reductions in most sectors outside electricity generation in recent years.

Energy in Scotland 2017

Energy in Scotland 2017 provides a summary of the energy statistics for Scotland across the range of technologies. It provides information on where matters stand with regards to meeting the energy generation targets and this is covered in Section 8 of this Planning Statement.

Climate Change Plan The Third report on Proposals and Policies 2018-2032

The Climate Change Plan (CCP 2018), 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.

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 2017 envisages that by 2030 Scotland's electricity system will be wholly decarbonised and with electricity supplying a growing share of Scotland's energy needs.

Current Scottish Government Energy Policy

In December 2017 the Scottish Government published two energy policy documents, comprising the following:

- the Scottish Energy Strategy 'The Future of Energy in Scotland'; and
- the Onshore Wind Policy Statement.

Together, these policy documents represent the Scottish Government's intended energy and climate change strategy for the period to 2050. Further information in respect of these documents is contained in Section 8.2 of this Planning Statement.

Scottish Energy Strategy 2017

The Scottish Government published its Scottish Energy Strategy (SES 2017) in December 2017. The SES 2017 sets out a vision for a strong and sustainable low carbon economy. SES 2017 describes the Scottish Government's vision for the future energy system in Scotland beyond 2020 looking forward until 2050.

The SES is designed to provide a long term vision to guide detailed energy policy decisions over the coming decades. It sets out the priorities for an integrated system-wide approach that considers both the use and the supply of energy for heat, power and transport. It contains six energy priorities including increasing renewable energy production and increasing flexibility, efficiency and resilience of the energy system.

The main document was published alongside the OWPS. This document provides focus for onshore wind.

The SES 2017 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. It advises that it has a vision for:

"a flourishing, competitive local and national energy sector, delivering secure, affordable, clean energy for Scotland's households, communities and businesses."

The SES 2017 sets two new targets for the Scottish energy system by 2030. These are:

- *"The equivalent of 50% of the energy for Scotland's heat, transport and electricity consumption to be supplied from renewable sources; and*
- *An increase by 30% in the productivity of energy use across the Scottish economy."*

Reaching 50 % in the 13 years from the publication of the SES 2017 will be challenging, despite the good progress being made with the equivalent of 17.8% being met by renewable sources in 2015, and the SES 2017 acknowledges this.

Renewable and low carbon solutions are identified as one of six energy priorities around which the 2050 vision is built. The document advises that the Scottish Government:

"will continue to champion and explore the potential of Scotland's huge renewable energy resource, and its ability to meet our local and national heat, transport and electricity."

Under the heading of Renewable Energy SES 2017 is clear that the Scottish long term climate change targets will require the near complete decarbonisation *"of the Scottish energy system by 2050 and that renewable energy is anticipated to meet a significant share of this".*

In the section on Onshore Wind, SES 2017 advises that "onshore wind is now amongst the lowest cost forms of power generation of any kind and is a vital component of the huge industrial opportunity that renewables create for Scotland". Onshore wind is identified as being required to play a vital role in the future of Scotland, helping to decarbonise electricity, boosting the economy and meeting demand. The SES 2017 notes that in order to achieve the targets it means developers and communities working together and striking the right balance between environmental impacts, local support, benefit and where possible economic benefits deriving from community ownership.

Onshore Wind Policy Statement

The Onshore Wind Policy Statement (OWPS 2017) reaffirms the existing Scottish Government's onshore wind policy set out in previous publications. The Ministerial Foreword is clear that there is no question that onshore wind has played a dominant and hugely successful role in contributing to the targets. It notes that onshore wind plays a valuable role in the empowerment and reward of local communities which are located near developments. The document focuses on the need to support development in the right places including, where acceptable, the inclusion or larger turbines, with effects and impacts of proposed developments being considered on their merits. The need to strike the right balance between environmental effects and impacts, local support and economic benefits is highlighted. It includes separate sections on the following key priority areas:

- route to market;

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

The section on Route to Market makes is clear that the Scottish Government expect *"onshore wind to remain at the heart of a clean, reliable and low carbon energy future in Scotland." Onshore wind is to remain "crucial in terms of meeting the goals for a decarbonised energy system." The Scottish Government is clear that the approach taken in the OWPS 2017 means that "Scotland will continue to need more onshore wind development and capacity, in locations across landscapes where it can be accommodated."*

The OWPS 2017 is clear that the Scottish Government believe that *"new onshore wind projects can and must be developed with no additional subsidy cost to consumers."* The OWPS invites "applicants to explain clearly how environmental impacts have been balanced against energy yield during design iteration and reported as part of the information provided in support of applications." Chapter 2 of the EIA Report sets out the design evolution process and sets out the expected yield associated with the turbines for the proposed development.

The OWPS is clear that innovative solutions such as the integration of energy storage within onshore wind farm proposals not only help improve the ability of variable generators, such as onshore wind, to manage generation and demand but can also help grow the supply chain. The OWPS (2017) states: continuing support for innovation – for example, the development of smarter networks, active management and storage technology – can have a positive effect on the integration and economics of onshore wind generation. Innovation in the onshore wind sector can help the Scottish supply chain to grow, creating jobs and opportunities, and securing Scotland's position as a hub for innovation and investment.

In the Chapter on Community Benefits the OWPS 2017 advises that *"As of November 2017 over £12 million [in community benefit payments] has been paid out over the preceding 12 month period".* The community benefit being offered by the proposed development is set out in Section 2.3.4 of this Planning Statement and is considered to be a valuable contribution to the community.

The OWPS 2017 is clear that the Scottish Government is keen to see a significant increase in shared ownership of renewable energy projects delivering long lasting economic assets to communities across the country.

The progress to the renewable energy targets is considered to be an important material consideration.

Climate Change Plan, The Third Report on Proposals and Policies 2018-2032

The Scottish Government published the Climate Change Plan, The Third Report on Proposals and Policies 2018-2032 (CCP 2018) in February 2018 which sets out Scotland's decarbonisation plans to 2032. The Executive Summary advises that the CCP 2018 sets out how Scotland can deliver its target of 66 % emissions reductions, relative to the baseline for the period 2018-2032.

APPENDIX 3

LDP Policies

Appendix 3: LDP Policies

The policies of the LDP have not been set out in full in the main body of the Planning Statement. For ease of reference they are provided here.

Policy P1 Layout, Siting and Design

We will support major developments (more than 50 homes, or more than 2 hectares of employment, retail or mixed use development), or new development on sites we have identified within the settlement statements as requiring a development framework or masterplan, if they keep to a previously agreed statement(s) on the proposed design for the site. We will assess all development, whether on sites we have allocated or elsewhere, using a process that includes appropriate public consultation. We will only approve development designs that demonstrate the six qualities of successful places, which are to be:

- distinctive with a sense of local identity through creation of a sense of place and the aesthetics of the design features and elements;
- safe and pleasant, encouraging both activity and privacy, providing security and protecting amenity;
- welcoming through visual appeal, style and the creation of a welcoming environment;
- adaptable to future needs through the balance of land uses, building types, density, sizes and tenures (including housing for people on modest incomes), and the flexibility to adapt to the changing circumstances of occupants;
- efficient in terms of resources used in terms of waste management, water use, heating and electricity, the use of recycled materials and materials with low embodied energy, and responding to local climatic factors associated with cold winds, rain, snow and solar gain; and
- well connected to create well connected places that promote intermodal shifts and active travel.

Measures require to be identified to enhance biodiversity or geodiversity in proportion to the opportunities available and the scale of the development opportunity and to accord with the Zero Waste Plan, a Site Waste Management Plan will be submitted to demonstrate that developers have minimised the generation of waste during the construction and operational phases of new development. These obligations may be controlled by conditions.

Policy P4 Hazardous and Potentially Polluting Developments and Contaminated Land

We will refuse development if there is a risk that it could cause significant pollution, create a significant nuisance, or present an unacceptable danger to the public or the environment. This includes developments we are told by the Health and Safety Executive to be near facilities they have identified as hazardous. Pipelines, agricultural buildings, wastewater treatment plants, waste disposal/ treatment facilities and heavy industrial uses are all examples of development which could create a nuisance, pollution or hazard. In any circumstances where development of this kind is, on balance, considered acceptable by the appropriate authorities, satisfactory steps must be taken to mitigate any residual negative development impacts.

In determining planning applications for development within the consultation zones for hazardous installations (including oil and gas pipelines) we will consult with, and take full account of advice from, the Health and Safety Executive (HSE) and the facility's owners and operators and will seek to ensure that any risk to public safety is not increased. Prospective applicants should check whether their proposed development is within the

consultation zone of a major hazard site or a major accident hazard pipeline and should seek further advice if this is the case. This confirmation and advice can be obtained from the HSE Planning Advice Web App at www.hse.gov.uk/landuseplanning/developers.htm or from the Council's Development Management Team. Planning permission may be refused for potentially hazardous developments, or for other forms of development in close proximity to existing hazardous developments, in the event that insufficient information has been submitted to demonstrate the impacts or where the impacts are unclear or unknown.

We will not allow development on land that is known or suspected to be contaminated unless appropriate site investigations have been undertaken to identify any actual or possible risk to public health or the environment (including possible pollution of the water environment), and effective remedial actions are proposed to ensure the site is made suitable for its new use. Where site conditions are appropriate, consideration should be given to both radioactive and non-radioactive sources of contamination. Both the site investigations and any remedial actions should be proportionate to the scale and nature of the proposed development and be in accordance with Planning Advice Note 33: Development of Contaminated Land and the advice of the Council's Infrastructure Services (Contaminated Land) section.

Any proposed development which could have a significant detrimental impact on air quality, including the exacerbation of existing air quality issues, must provide appropriate mitigation measures.

Policy E1 Natural Heritage

Nature Conservation Sites

We will not allow new development where it may have an adverse effect on a nature conservation site designated for its biodiversity or geodiversity importance, except where the following circumstances apply. In the case of an internationally designated nature conservation site, we will not allow development which may have an adverse effect on its integrity, except where there are imperative reasons of overriding public importance and there is no alternative solution. In all cases, suitable compensatory measures must be implemented.

For nationally designated sites a thorough assessment must demonstrate that the objectives of designation and the overall integrity of the site will not be compromised, or that any significant adverse effects on the qualities for which the site has been designated are clearly outweighed by social, environmental or economic benefits of national importance. In all cases, any impacts must be suitably mitigated.

For other recognised nature conservation sites (such as Local Nature Conservation Sites, nature reserves, designated wetlands, woodland in the Scottish Natural Heritage Ancient Woodland Inventory and the

Native Woodland Survey of Scotland) the proposal's public benefits must clearly outweigh the nature conservation value of the site. In all cases, impacts must be suitably mitigated and, for any proposals involving the removal of woodland, the Scottish Government Control of Woodland Removal Policy will apply. We, along with others with an interest, including Scottish Natural Heritage, Royal Society for the Protection of Birds, Scottish Wildlife Trust and Aberdeen University, have identified about 100 Local Nature Conservation Sites which are introduced by this plan. These replace a previous local designation of Sites of Interest to Natural Science and are also shown on the proposals map and in detail in supplementary guidance "Local Nature Conservation Sites".

Protected Species

Development should seek to avoid any detrimental impact on protected species through the carrying out of surveys and submission of protection plans describing appropriate mitigation where necessary. Development likely to have a detrimental impact on protected species will not be approved unless: for European Protected

Species, a thorough assessment of the site has demonstrated that the development is required for imperative reasons of overriding public interest and that the population will be maintained at a favourable conservation status in its natural range; or, for non-bird species protected under the Wildlife and Countryside Act 1981 (as amended) or the Protection of Badgers Act 1992, there will be significant social, economic or environmental benefits. In either case there must be no other satisfactory solution.

Lists of species protected by legislation are available from Scottish Natural Heritage at http://www.snh.gov.uk/.

Wider Biodiversity and Geodiversity

A baseline ecological survey should be prepared for all major developments and for smaller proposals where there is evidence to suggest that a habitat, geological feature or species of importance may exist on the site. If development may affect undesignated habitats listed in Annex I of the EC Habitats

Directive, species listed in Annex II of the EC Habitats Directive, species listed in Annexes I and II of the EC Birds Directive, habitats or species on the Scottish Biodiversity List, Local Biodiversity Action Plan priority habitats/species, other species of importance to biodiversity, areas of importance to geodiversity, or semi-natural habitats, we will only approve it when a baseline ecological survey has been carried out; the development has been designed to avoid impacts where possible; and, where impacts cannot reasonably be avoided, an ecological or geological management plan demonstrates public benefits that outweigh the ecological or geological value of the site. Development will not be allowed if it fragments habitats or is not designed to minimise any adverse impact on the sites environmental quality, ecological status or viability.

Policy P1 also says that all developments should identify measures that will be taken to improve biodiversity and geodiversity in proportion to the potential opportunities available and the scale of the development.

Policy E2 Landscape

We will refuse development that causes unacceptable effects through its scale, location or design on key natural landscape elements, historic features or the composition or quality of the landscape character. These impacts can be either alone or cumulatively with other recent developments. Development should not otherwise significantly erode the characteristics of landscapes as defined in the Landscape Character Assessments produced by Scottish Natural Heritage (see www.snh.gov.uk/protecting-scotlandsnature/looking-after-landscapes/lca/) or have been identified as Special Landscape Areas of local importance.

Boundaries and qualifying criteria for Special Landscape Areas are identified in the supplementary guidance Aberdeenshire Special Landscape Areas. Developments located within Special Landscape Areas will only be permitted if the qualifying interests are not being adversely affected or effects of the development are clearly outweighed by social, environmental or economic benefits of at least local importance.

Policy HE1 Protecting Historic Buildings, Sites and Monuments

We will protect all listed buildings contained on the statutory list of Buildings of Special Architectural or Historic Interest for Aberdeenshire, archaeological sites and scheduled monuments. We will encourage their protection, maintenance, enhancement, appropriate active use and conservation.

We will not allow development that would have a negative effect on the character, integrity or setting of listed buildings, or scheduled monuments, or other archaeological sites.

Alterations to listed buildings will only be permitted if they are of the highest quality, and respect the original structure in terms of setting, scale, design and materials.

Development on nationally or locally important monuments or archaeological sites, or on their setting, will only be allowed if there are imperative reasons of overriding public interest, including those of a social or economic nature, and there is no alternative site. It is the developer's responsibility to provide information on the nature and location of the archaeological features prior to determination of the planning application and either mitigate impacts or, where preservation of the site in its original location is not possible, arrange for the full excavation and recording of the site in advance of development.

Policy PR1 Protecting Important Resources

We will not approve developments that have a negative effect on important environmental resources associated with the water environment, important mineral deposits, prime agricultural land, peat and other carbon rich soils, open space, and important trees and woodland. In all cases development which impacts on any of these features will only be permitted when public economic or social benefits clearly outweigh the value of the site to the local community, and there are no reasonable alternative sites.

New development, including aquatic engineering works, which will generate discharges or other impacts on existing water bodies, or which could affect the water quality, quantity, flow rate, ecological status, riparian habitat, protected species or flood plains of water bodies (including their catchment area) must not prejudice water quality or flow rates, or their ability to achieve or maintain good ecological status. Any such developments must contribute to the objectives set against the relevant water bodies through the river basin management process as well as the relevant freshwater objectives and targets within the North East Local Biodiversity Action Plan. Opportunities for the creation, enhancement and management of habitats should be embraced so as to contribute to the improvement of the ecological status of the water body. Any aquatic engineering works must be capable of being consented under Controlled Activities Regulations. Adequate buffer strips should be provided to allow for maintenance all year round.

Groundwater dependent terrestrial ecosystems (GWDTE), which are types of wetland, are specifically protected under the Water Framework Directive. Phase 1 Habitat surveys should be used to identify if wetlands are present. If present, then the more detailed National Vegetation Classification survey should be completed to identify if GWDTE are present. If GWDTE are present, the developer should avoid them (with a buffer), or further assessment and appropriate mitigation will be required.

Prime agricultural land, as defined as classes 1, 2 and 3.1 of the Soil Survey for Scotland, Land Capability for Agriculture series, should not normally be developed unless it is allocated in the local development plan. For clarity, time-limited proposals for renewable energy generation or mineral extraction may be acceptable on prime agricultural land providing the site will be restored and returned to its original status. In addition, small-scale development proposals that are directly linked to a rural business may be permissible where they are located on prime agricultural land.

Development will not normally be permitted on areas of open space, including outdoor sports facilities, unless the new use is ancillary to the use as open space. Important areas of open space are identified as "protected land" within the settlement statements. Exceptionally, the development of essential community infrastructure may be allowed if it will not result in a deficit of open space of the type affected within the settlement, as evidenced by the Open Space Audit, or prejudice the continuity of a green network. Where loss of open space occurs as the result of a new development then replacement must be made of an appropriate type, quantity, accessibility and quality within the settlement.

Development resulting in the loss of, or serious damage to, trees and woodlands of significant ecological, recreational, historical, landscape or shelter value will not normally be permitted. In order to determine whether there are significant public benefits that would outweigh any loss or damage to trees and woodlands, the developer must submit an evaluation of the biodiversity and amenity value of the woodland and habitat,

including both its current and potential future benefits. Where development is considered appropriate, damage to existing trees must be minimised and there must be no unnecessary fragmentation of existing or potential woodlands networks. Compensatory planting must also be undertaken to an agreed standard in order to mitigate the impact of the removal on landscape, sequestered carbon, character, amenity and ecological diversity.

We will support opportunities for new woodland creation and/ or enhancement, in line with the Aberdeenshire Forest and Woodland Strategy to be published as supplementary guidance to provide a focus for new planting, restocking, enhancement and management of woodlands.

We identify important mineral safeguarded sites where other types of development should not generally be allowed, and wider areas of search where mineral resources should not be sterilised by inappropriate developments. Major non-minerals developments will be permitted in the areas of search if an opportunity is given for the extraction of mineral resources before the development commences. On safeguarded sites non-mineral developments will be refused unless they are small-scale and ancillary to existing uses, or of a temporary nature. Safeguarded sites and areas of search are identified on the proposals map and detailed in supplementary guidance Areas safeguarded or identified as areas of search for minerals development.

Policy C2 Renewable Energy

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.

We will approve applications for solar panel arrays greater than 50kW if their cumulative impact with other arrays has been assessed and can be dismissed, account has been taken of glint and glare issues and it has been demonstrated that any significant impacts will have a duration of less than five minutes in any one day, there are no objections from the Ministry of Defence, the National Air Traffic Services or civil airport operators, and boundary treatments limit vehicular access to the site through means designed to make any security fencing unobtrusive and screen the development.

We will approve hydro-electric schemes if they are located, sited and designed to have no individual or cumulative adverse impact on the water environment. This may be relaxed for larger schemes (annual output equal to or greater than 0.35 gigawatt hours) if the deterioration can be justified on the basis of wider social or economic benefits, or impacts on other users of the water environment. In all cases mitigation will be required to protect river flow, river continuity for fish and provide for sediment transfer, and otherwise comply with the “Guidance for developers of runoff- river hydro-power schemes” published by SEPA.

Other renewable energy developments are required to relate well to the source of the renewable energy

required for operation and satisfactory steps must be taken to mitigate any negative impacts on occupiers of nearby properties.

In all cases, conditions, bonds, or other legal agreements may be imposed to remove visible renewable energy structures whenever the consent expires or the project ceases to operate for a specified period.

APPENDIX 4

Shared Ownership and Economic Benefit

Appendix 4: Shared Ownership and Economic Benefit

Net Economic Benefit

The Scottish Government has set a target of 1 GW of community owned renewable energy projects by 2020 and 2 GW by 2030. In addition, by 2020, the Scottish Government want at least 50 % of newly consented renewable electricity projects to have an element of shared ownership.

The Draft Advice on Net Economic Benefit and Planning (Scottish Government 2016) sets out advice on calculating net economic benefit. It advises that a development should be valued and the net economic benefit calculated over the lifetime of the proposed development. It advises that *"the key criterion in assessing the economic impact of a proposed development is to estimate the economic position where the development proceed, and then compare it with the estimated economic position if the proposal does not go ahead. The difference between these two estimates is the net economic benefit."*

Shared Ownership

The principle of shared ownership is supported within the planning framework in NPF3 and SPP. 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."*

SPP advises that:

"Net economic benefits are considered to be a material planning consideration."

In addition, the Scottish Government supports the principle of shared ownership as part of renewable energy developments. Good Practice Principles for Shared Ownership from Onshore Renewable Energy Developments was recently updated in 2019. This document provides guidance on the process of a renewable energy business making an offer, and a community accepting that offer. The aim of the review was to ensure that Scottish communities continue to benefit from local projects in a manner that is appropriate for the current and future context in which renewable energy projects are developed, and advises on how local communities, renewable energy companies and local authorities can work together to achieve this. The document is clear that in order for a development to receive planning permission it should be acceptable without taking into consideration the shared ownership element.

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".*

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."*

Appendix 5: Community Partnership Strategy

now part of

Clashindarroch II Wind Farm

Clashindarroch II Community Partnership Strategy

for

Project Ref: 42084/001 | Rev: AA | Date: December 2019

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For and on behalf of Peter Brett Associates LLP				

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Contents

1 Introduction 1
1.1 Overview 1
2 Context 2
2.1 Overview 2
2.2 Shared Ownership of Clashindarroch II 2
2.3 Socio-economic Profile 3
2.4 Clashindarroch Community Fund 4
3 Policy 6
3.1 Relevant Policy 6
4 Strategic Objectives 10
4.1 Overview 10
4.2 Strategic Objectives 10
4.3 Actions 13
4.4 Governance Structure 23
4.5 Net Economic Benefit 23
4.6 Summary 29
4.7 Next Steps 29

Figures

Figure 2.1: Clashindarroch II Area Map 3

Tables

Table 4.1 Strategic Objectives Summary, Justification Relevance & Linked Policy Document 10
Table 4.2 Strategic Priorities 13
Table 4.3 Estimated Community Benefit Generation 24
Table 4.4 Employment Supported (5-years) 26
Table 4.5 Employment Supported (30-years) 26
Table 4.6 5-Year Possibilities 27
Table 4.7 30-Year Possibilities 28

Appendices

Appendix A Community Action Plans

1 Introduction

1.1 Overview

1.1.1 Vattenfall plans to develop the Clashindarroch II wind farm near Huntly, Aberdeenshire. The proposed development, Clashindarroch II, consists of up to 14 turbines with a maximum tip height of 180m.

1.1.2 The Clashindarroch II wind farm will provide an additional community benefit package from its operation to the established Clashindarroch I Community Fund in the area. In line with Scottish Government recommendations[1], the proposed level of community benefit package for Clashindarroch II is up to £5,000 per MW per annum, index linked for the operational life of the windfarm (up to 30 years) or an equivalent value benefits package.

1.1.3 In addition to the provision of a community benefit package, Vattenfall has also approached local community partnerships to discuss the potential for participation in a shared ownership venture. Vattenfall is offering up to 5% of the anticipated shared revenue generated at Clashindarroch II from participation in a shared ownership proposition.

1.1.4 This strategy describes the agreed objectives and actions developed in consultation with the interested community councils in close proximity to the Clashindarroch II Wind Farm. It is intended to be used by the community vehicle who will participate in the shared ownership proposition to guide fund expenditure.

Coverage

1.1.5 The area of coverage adopted for this strategy combines four Aberdeenshire Community Council areas (Huntly, Strathbogie, Tap o' Noth & Donside). The area was identified based on its proximity to the proposed Clashindarroch wind farm and the potential for its communities to financially benefit from its operation. A description of the area covered by the Strategy is provided in **Section 2**.

Process

1.1.6 Peter Brett Associates (now part of Stantec) was appointed by Vattenfall to develop an outline Community Strategy and establish its net economic benefit.

1.1.7 Preparation of this strategy has involved a number of stages, including:

- A desk-based analysis of issues across the wider area;
- A review of the relevant community action plans and consultation events with interested local community groups between 2017- 2019; and
- Meetings, public events and workshops which are discussed further in **Section 2**.

1.1.8 The report is presented under the following headings:

- **Section 2**: Context;
- **Section 3:** Relevant Policy;
- **Section 4:** Strategic Objectives; and
- **Section 5:** Next Steps.

[1] Scottish Government Good Practice Principles for Community Benefits from Onshore Renewable Energy Developments (2019)

2 Context

2.1 Overview

2.1.1 Clashindarroch Wind Farm is located near Huntly, Aberdeenshire. It has been operational since mid-2015 and has a capacity of 36.9MW, generating 114,469MWh every year. The Clashindarroch Community Fund provides around £185,000 annually for projects in Huntly, Strathbogie and Tap o' Noth and the area of the Cabrach Community Association.

2.1.2 In developing the proposed Clashindarroch II wind farm, PBA was appointed by Vattenfall to develop a Clashindarroch Community Partnership Strategy. Community Action Plans (CAPs) were reviewed to understand the local context and to identify strategic objectives to frame actions to address local issues (see **Appendix A**).

2.1.3 A number of public exhibitions, meetings and workshops were hosted by PBA and Vattenfall between 2017 and 2019. All interested local Community Councils (Huntly, Tap o' Noth, Strathbogie and Cabrach Association) and partnerships (Huntly and District Development Trust, Marr Area Partnership) were invited to attend, as were key stakeholders such as Local Energy Scotland and Aberdeenshire Council.

2.1.4 These sessions aimed to capture the issues faced by local communities and discuss and agree strategic objectives to address them.

2.1.5 These issues were then confirmed at a Shared Ownership Workshop held in Aberdeen on the 4th March 2019. The attendees at the workshop included representatives from Vattenfall, Peter Brett Associates, Local Energy Scotland, Huntly & District Development Trust, Marr Area Partnership, Aberdeenshire Council and Abundance.

2.2 Shared Ownership of Clashindarroch II

2.2.1 Following communication of the shared ownership opportunity, Marr Area Partnership (MAP) and Huntly & District Development Trust (HDDT) ('Community Bodies') have agreed to enter a joint partnership to explore a shared ownership proposition.

2.2.2 HDDT operates in the AB54 postcode of Aberdeenshire. It includes Cabrach and is bounded by Aberchirder to the North and Lumsden to the South. Its largest settlement is Huntly, with supporting settlements Aberchirder, Cabrach, Gartly, Insch, Lumsden, Rhynie and Torry.

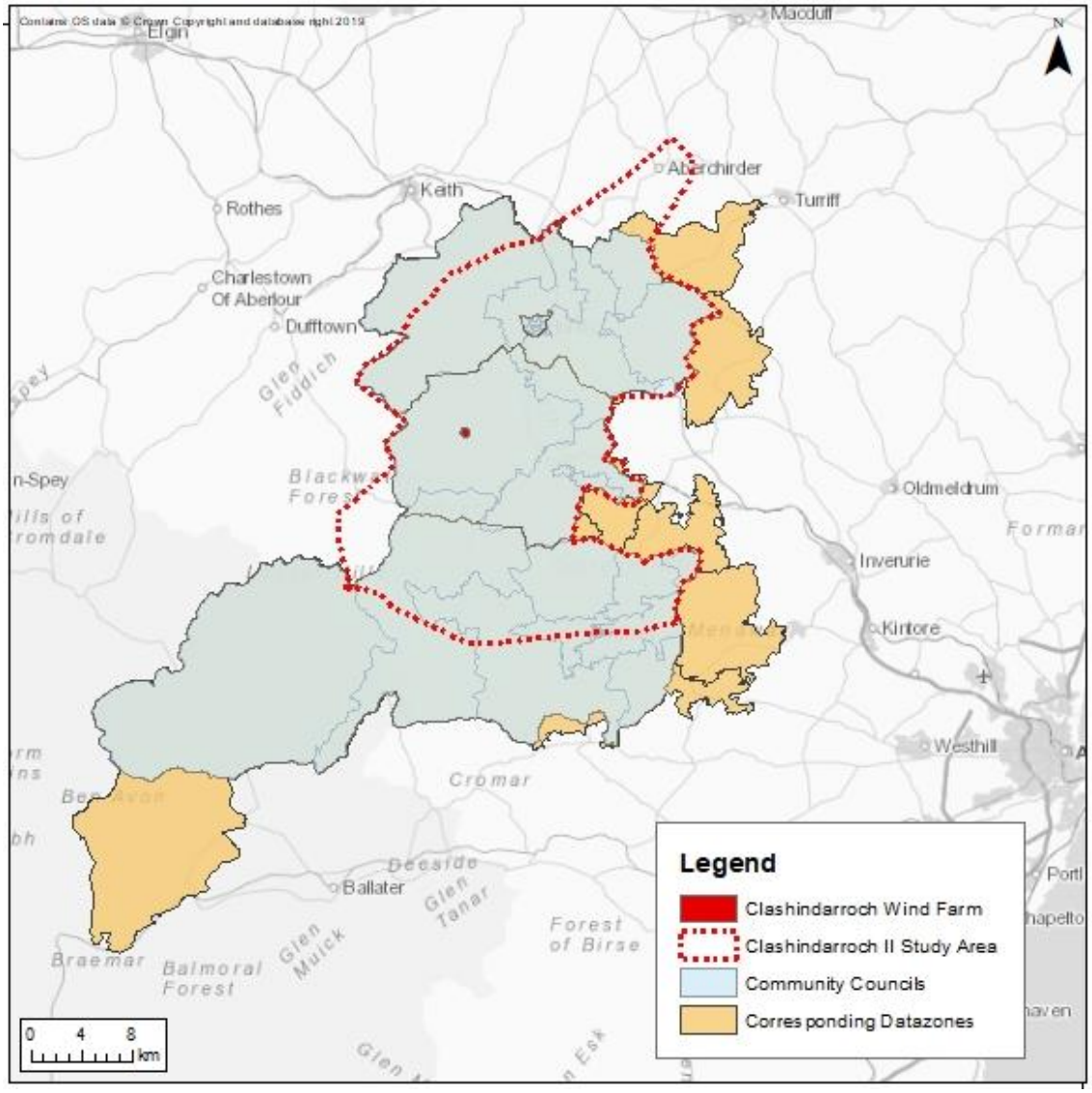
2.2.3 MAP (covering Marr Aberdeenshire Council Administrative Area) overlaps with the area covered by HDDT and stretches from Huntly in the North, to Banchory in the South East and across to Braemar to the West. Settlements in this area include Huntly, Aboyne, Banchory, Braemar, Donside, Howe of Alford, Lumphanan, Mid-Deeside, Upper Deeside, Strathbogie, Tarland and Torphins.

2.2.4 While MAP and HDDT both cover an extensive area, the area of benefit for the scheme ('the Clashindarroch II Area') shall be similar to the original area of benefit that was adopted for Clashindarroch Wind Farm, i.e. the Strathbogie, Huntly and Tap o' Noth Community Councils and the area covered by The Cabrach Trust. Following representation from MAP, it will also now incorporate a small proportion of the North Marr area within the Donside Community Council area.

2.2.5 While the community bodies have yet to formally agree the boundary for the area of benefit, discussions with MAP and HDDT indicate the boundary will extend southward into the Donside Community Council area, ending at the Howe of Alford, with the village of Alford at its centre close to the River Don.

2.2.6 A map of the community council areas and data zones covering the Clashindarroch II Area is provided in **Figure 2.1**. The area shown below was used to complete the socio-economic assessment in **Section 2.3.**

Figure 2.1: Clashindarroch II Area Map



2.3 Socio-economic Profile

2.3.1 A socioeconomic profile of the Clashindarroch II area was prepared based on the four community council boundaries (Huntly, Strathbogie, Tap o' Noth and Donside). The community council areas shown in **Figure 2.1** contain the vast majority of the Clashindarroch II Area identified by this strategy, with the exception of The Cabrach which straddles the Tap o' Noth, Donside and Dufftown & District Community Council areas. The socioeconomic figures presented in this section are derived entirely from the Community Council areas and associated data zones[2] shown in Figure 2.1.

[2] Scottish Government Statistics and National Records of Scotland

Population

2.3.2 While it covers 47% of Aberdeenshire, Marr is the least densely populated administrative area in Aberdeenshire with 12.8 persons per km^2. Its estimated population is 37,609 (over 15% of Aberdeenshire's population in 2016).

2.3.3 Population estimates show the Clashindarroch II Area has 18,130 residents. Huntly is the largest settlement in the area with a population of some 4,800[3].

Economic Activity

2.3.4 The Clashindarroch II Area has a significantly higher population of residents aged 65+ (c. 21.4%) than across Aberdeenshire (c.16.6%)[4]. Of the population living in Marr, approximately 60.86% are working age compared to 64.5% across Aberdeenshire. This indicates a lower than average working age population. For people aged 0-15, Marr (17.7%) has slightly less than Aberdeenshire (18.9%). In comparison to Aberdeenshire as a whole, there is a significant shortfall of working age residents remaining in the area.

Industry

2.3.5 The most common industry sectors throughout the Clashindarroch II Area[5] are Health (15.2%), Retail (12.1%), Education (10.7%) and Manufacturing (10%). The area also has significant proportions of the population working in Construction (9.7%), Professional, Scientific and Technical (8.1%) and Accommodation & Food Services (6.5%). The low proportion of jobs in the Clashindarroch II Area (5,515) compared to the number of working age residents (11,034) suggests a low job density in the area, with many commuting elsewhere to go to work.

Housing

2.3.6 The Aberdeen City and Shire Housing Need and Demand Assessment (HNDA)[6] provides an evidence base for both Aberdeen City and Aberdeenshire Council to plan for housing requirements, including the availability of housing land over the next 5 years. It identifies two housing market areas (Aberdeen HMA and the Rural HMA), of which the Clashindarroch II area falls entirely within the Rural HMA. The population of the Rural HMA has increased by 9.7% between 2001-2016, less than the increase in the Aberdeen HMA at 13.1% over the same period.

2.3.7 The HNDA operates on the assumption that a household can afford to buy a house if the price is no more than four times annual income. The HNDA identifies a shortage of affordable housing in the Rural HMA for people on a lower quartile income (£16,037) with prices at an average of 7 times their annual income. For those in the Rural HMA, lower quartile housing is affordable only for those on the median income (£31,413) where houses are on average 3.6 times the annual income. Overall, lower quartile house prices in the Rural HMA have increased by 20% since 2010[7]. The HNDA identifies a supply of 1,066 affordable housing units in the Rural HMA to 2022.

2.4 Clashindarroch Community Fund

2.4.1 The Clashindarroch II Area currently benefits from Vattenfall's Clashindarroch Community Fund (CCF), which supports projects located within or directly benefiting one or more of the

[3] National Records of Scotland Population Estimates- Huntly (2016)

[4] National Records for Scotland- Population Estimates 2018

[5] Scottish Government www.statistics.gov.scot

[6] Aberdeen City and Shire Housing Need and Demand Assessment (2017)

[7] Lower quartile house price data is the average price in the lowest quarter of all house prices.

community council areas of Huntly, Strathbogie and Tap o' Noth and the area of the Cabrach Trust/Community Association. The Clashindarroch Community Fund provides up to £5,000 per MW installed index linked for the operational life of the project resulting in around £185k annually towards community group projects in the form of grants from £500 to over £25,000.

2.4.2 Since 2015, more than £550,000 has been contributed to the VCCF. Grants have been awarded to 65 projects:

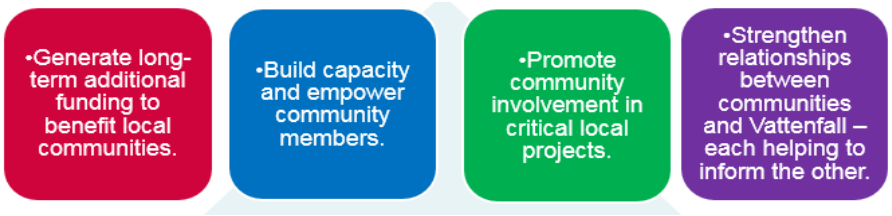
- 21 contemporary culture, events and recreational activity projects;
- 21 for improvements to community services and facilities;
- 17 to promote rural regeneration;
- 3 for cultural, historic and archaeological heritage projects; and
- 3 to preserve/ enhance the natural environment for residents and visitors.

2.4.3 The Scottish Government's 2019 Good Practice Principles for Community Benefits from Onshore Renewable Energy Developments document recognises that many communities and developers would like to see a move away from cash benefits to a more flexible system. There is potential here for developers to help communities realise some of their ambitions and priorities by delivering items on their behalf as part of an overall package of community benefits up to the value of 5K per installed MW per annum.

2.4.4 While the CCF provides valuable financial benefit to the surrounding communities of Clashindarroch, shared ownership, working alongside community benefit and indeed other funding which may be available, does provide an opportunity for a strategic approach to addressing community issues in the Clashindarroch II Area, several of which are of long standing.

2.4.5 A review of historic funding applications to the CCF identified the limited scale of grant applications to date. This document provides a strategic outlook, identifying investment opportunities and associated actions for the community bodies to address long-standing local issues. Described in detail in **Section 4.5**, participation in shared ownership, alongside the community benefit package will have positive local economic impact.

2.4.6 Overall, shared ownership can provide an opportunity to address key local issues, including the potential to:



3 Policy

3.1 Relevant Policy

3.1.1 This section describes the policy context for the Clashindarroch Community Partnership Strategy and related objectives which it could address.

National

3.1.2 **National Planning Framework 3 (2014)** describes the long term-vision for development and investment across Scotland over the next 20 to 30 years. It is the spatial expression of the Scottish Government's Economic Strategy and highlights opportunities for rural development in renewable energies. It aims to reduce social and spatial inequalities for rural communities via shared ownership, with a target of at least 500MW of renewable energy in community and local ownership by 2020. It also recognises the lasting impact of community ownership of renewable energy development, identifying the potential benefits of community energy projects as "*nationally significant*".

3.1.3 **Scottish Planning Policy (2014)** sets out national planning policies which reflect the Scottish Ministers priorities for the operation of the planning system, and for the development and use of land. The document aims to contribute to the Scottish Governments goal of achieving sustainable economic growth. Of relevance to this strategy, Paragraph 169 identifies criteria to be taken account of when considering the viability of renewable energy proposals:

- Net economic impact, including local and community socio-economic benefits such as employment, associated business and supply chain opportunities;
- The scale of contribution to renewable energy generation targets;
- Cumulative impacts;
- Impacts on communities and individual dwellings, including visual impact, residential amenity, noise and shadow flicker;
- Effects on the natural heritage, including birds;
- Public access, including impact on long distance walking and cycling routes and scenic routes identified in the NPF;
- Impacts on the historic environment, including scheduled monuments, listed buildings and their settings; and
- Impacts on tourism and recreation.

3.1.4 Paragraph 175 states "*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*".

3.1.5 **Protecting Scotland's Future: The Government's Programme for Scotland 2019-2020** identifies the actions that the Scottish Government will take over the next 12 months. It sets out the next steps to achieve the target of net zero emissions and the economic opportunity which the transition away from a carbon-based energy sector can offer. It includes several commitments to address Scotland's climate emergency:

- Unlock additional resource for emissions-reducing investment through a Green Growth Accelerator – referred to by the Climate Emergency Response Group (CERG) as a 'Green City Deal' – combining public and private investment to transform cities and regions;

- Bring to market a £3 billion portfolio of projects, including renewables, waste and construction, ready for green finance investment; and

- Ensure that from 2024, all new homes must use renewable or low carbon heat. This will be achieved through a fundamental overhaul in building regulations that will increase energy efficiency and the efficiency of construction from 2021, and will be accompanied by a £30 million investment in renewable heat projects

3.1.6 It recognises the key role that renewable energy sources will play in reducing emissions and meeting the target of net-zero emissions by 2045. The report precedes the next Energy Statement which will set out how renewable and low carbon energy generation in Scotland will achieve national outcomes.

3.1.7 **Scotland's Economic Strategy (2015)** provides the approach for achieving sustainable economic growth, increasing competitiveness and tackling inequality. The strategy seeks to strengthen the success and resilience of local communities to ensure they can benefit from economic growth and investment in their local area. It also voices support for informal or formal community partnerships across Scotland. Overall, the strategy sets out a commitment to empower communities to drive change within their local area and deliver growth in the shared interest of Scotland's population. The strategy also recognises the importance of strategic investment in infrastructure, including onshore wind to achieve economic targets.

3.1.8 The **Scottish Government Good Practice Principles of Shared Ownership of Onshore Renewable Energy Developments (2019)** guidance document presents the Scottish Governments ambition for shared ownership and how it fits with the Scottish Energy Strategy. It outlines the rationale for participation in shared ownership and sets out key principles of engagement for local communities. It provides details of key milestones and sets out clear roles and responsibilities for those involved.

3.1.9 The **Scottish Government's Good Practice Principles for Community Benefits from Onshore Renewable Energy Developments (2019)** sets out guidance for communities for the development of action plans and long-term priorities to create a lasting legacy with the income.

Regional and Local

3.1.10 The **Regional Economic Strategy 2018-2023 (2018)** was published by Aberdeenshire Council, Aberdeen City Council and Opportunity North East to set out the shared vision for the region to maximise the benefits from economic investment. It seeks to achieve long term economic prosperity for its communities and people. The **Aberdeenshire Council Community Benefit Guidance** sets out the steps and processes to be taken into consideration when seeking local economic benefit from the development of wind farms in your local area including community benefit funding and types of ownership.

3.1.11 The **Aberdeenshire's Local Outcomes Improvement Plan (LOIP) 2017-2027** sets out the vision to achieve the aspirations of local communities in Aberdeenshire, particularly *"Connected and Cohesive Communities".* This priority encourages communities to become stronger, build their own capacity for change and promote partnership working.

3.1.12 The **Aberdeenshire Council Plan 2017-2022** provides an overview of the strategic direction of the local authority and a commitment to the creation of opportunities for groups and individuals to play a greater role in their own community. It sets out a number of priorities of relevance to this strategy:

- Support a strong, sustainable, diverse and successful economy;
- Have the best possible transport and digital links across our communities;
- Provide the best life chances for all our children and young people by raising levels of attainment and achievement;
- Have the right mix of housing across all of Aberdeenshire;
- Work to reduce poverty and inequalities within our communities; and
- Protect our special environment including tackling climate change by reducing greenhouse gas emissions.

Economic Outcomes

3.1.13 Achieving the objectives identified in this strategy will contribute to national and local economic policy outcomes in the following ways:

- Provide an opportunity for residents to benefit from economic growth and investment in their local area;
- Provide financial support for local community partnerships to achieve the aims of the strategy;
- Provide suitable/affordable accommodation for families to encourage more people to stay in the area;
- Create learning, employment and training opportunities for all residents, especially children and young people;
- Stimulate the economy, with higher spend on local services and products by tourists and residents locally and across the region;
- Empower the local community to drive change; and
- Formalise a partnership working approach between MAP and HDDT to address local issues.

3.1.14 This strategy has been developed in line with the Good Practice Principles published by the Scottish Government, with all local community councils and partnerships invited to be part of the process. The formalisation of the commitment to create a community vehicle between MAP and HDDT, will take place after a Section 36 and deemed planning permission has been granted for the scheme. Similarly, the actions identified in this strategy may be amended at a later date by the Clashindarroch II Area communities to meet their needs.

Community Action Plans

3.1.15 A desk-based search was undertaken to check the availability of community development documents across the Clashindarroch II Area (see **Appendix A**). Relevant Community Action Plans (CAPs) were then reviewed to identify common socioeconomic issues, including those prepared within the Clashindarroch II Area, by MAP. Plans for the following communities were reviewed:

- Aberchirder (2015);
- The Cabrach;

- Gartly (2016);
- Glenkindie & Towie (2019);
- Howe of Alford (2018);
- Huntly (2019);
- Marr Local Community Plan (2016-2019); and
- Strathdon (2016);

3.1.16 The CAP review highlighted local issues common across to the areas, including:

- **Restricted economic opportunities for young people**; There is a restricted number of local jobs and training opportunities for young people. Many young people seeking further education must also travel long distances to attend courses;
- **Poor quality community infrastructure**; Many communities have inadequate facilities, while others have none at all. Members of the community without a car are restricted by poor public transport links between communities to access services and employment opportunities;
- **Inadequate public transport provision**; Infrequent or non-existent bus services between communities' force many to rely on private transport. This can isolate older or more vulnerable members of the local community without this option;
- **Paths and cycle networks in poor condition**; Inadequate and at times, unsafe walking and cycle paths linking communities;
- **Limited internet connectivity**; Poor broadband and mobile connections in rural communities. This can reinforce perceptions of community remoteness and impact on those working or studying from home;
- **Limited road capacity and poor condition**; Requirements for road safety improvement measures such as traffic management, speed restrictions and poor signage impacts upon feelings of safety, especially for walkers and cyclists; and
- **Limited housing available**; There is a lack of affordable housing to attract and keep residents. Many houses also require modernisation (e.g. insulation).

3.1.17 To address these common issues, a number of strategic objectives have been identified with HDDT & MAP which recognise and work towards the core strategic functions presented in the relevant CAPs. These are presented in **Section 4**.

4 Strategic Objectives

4.1 Overview

4.1.1 This strategy aims to tackle the issues summarised at the end of the last chapter for the benefit of communities in the Clashindarroch II Area. Strategic objectives (**Section 4.2-4)** have been developed to provide a framework for subsequent actions in the Clashindarroch II Area.

4.1.2 There are a range of settlements and location specific issues across the Clashindarroch II Area. The strategic objectives have been developed to address these, although the relevance of some of the objectives may differ depending on a settlement's size or requirements:

- Market Town: Huntly;
- Supporting Town/Village Centres, including: Aberchirder, Alford, Cabrach, Gartly, Glenkindie, Haugh of Glass, Lumsden, Rhynie, Torry and Towie; and
- Parishes: All other areas without a designated retail or service centre.

4.2 Strategic Objectives

4.2.1 The strategic objectives proposed are discussed below:

Table 4.1 Strategic Objectives Summary, Justification Relevance & Linked Policy Document

1. Regeneration of town/village centres.			
Summary: Measures to encourage diversity of use and growth through regeneration. This will support the existing business population while broadening cultural activities, supporting local services and creating new economic opportunities.	**Justification:** Huntly is suffering from a declining centre, including vacancy. Public realm improvements, town centre events and flexible spaces have been identified by the community as a priority to encourage increased footfall, use and investment.	**Centres:** Huntly/ Supporting Town/Village Centres	**Linked Document:** Aberdeenshire Council Local Development Plan (2017), Proposed Aberdeenshire Local Development Plan (expected 2021).
2. **Community based action for a reduction in social isolation, impacts on wellbeing and gaps in health and social care provision.**			
Summary: Measures to address social isolation through support for social care enterprise. In addition, regular support for vulnerable members of the community. Empowerment of communities to address local issues.	**Justification:** Many of the settlements are geographically dispersed with little or no public centre, with some communities identifying requirements for more energy efficient housing and enhanced community infrastructure including community care initiatives.	**Centres:** Supporting Town/Village Centres/Parishes	**Linked Document:** Aberdeenshire Council Local Development Plan (2017), Proposed Aberdeenshire Local Development Plan (expected 2021).

3. **Adequate provision of affordable/suitable housing.**			
Summary: Measures to address shortage of suitable and affordable housing. Potentially including partnership working with Aberdeenshire Council to address local housing needs, development of a local housing trust, self-build initiatives and employment/upskilling opportunities for local communities.	**Justification:** Many communities have a shortage of affordable housing, which in turn limits their potential to retain and grow their population.	**Centres:** All Centres	**Linked Document:** Aberdeenshire Council Local Development Plan (2017), Proposed Aberdeenshire Local Development Plan (expected 2021).
4. **Access to economic opportunities for all.**			
Summary: Solutions to address the shortfall in local employment and training opportunities area, including building. This potentially extends to partnerships with local enterprises for training schemes, work experiences and apprenticeships during windfarm construction. Funding initiatives, local volunteering and CV workshops and funded placements are also suggested.	**Justification:** The community has indicated that there is a lack of local employment opportunities for local people, particularly for the younger working population.	**Centres**: All Centres	**Linked Document:** Aberdeenshire Council Local Development Plan (2017), Proposed Aberdeenshire Local Development Plan (expected 2021). Regional Economic Strategy 2018-2023, Scotland's Economic Strategy.
5. **Thriving community infrastructure.**			
Summary: Identification of opportunities to meet local needs for community facilities including physical upgrades to current facilities, and increased capacity. The development of a regular events programme will also have local economic benefits.	**Justification:** There is a shortfall in maintenance of existing community facilities and the provision of new accessible, bookable sports and community facilities capable of hosting regular events.	**Centres:** All Centres	**Linked Document:** Aberdeenshire Council Local Development Plan (2017), Proposed Aberdeenshire Local Development Plan (expected 2021). Aberdeenshire Local Outcomes Improvement Plan 2017-2027

6. **Accessible and frequent community transport.**			
Summary: Measures to provide locally run public transport between villages and outside of working hours. Community transport services will generate local economic benefit.	**Justification:** There is a lack of frequent, reliable public transport services for communities. impacting local residents, particularly vulnerable people.	**Centres:** Supporting Town/Village Centres/Parishes	**Linked Document:** Aberdeenshire Council Local Development Plan (2017), Proposed Aberdeenshire Local Development Plan (expected 2021).
7. **Improved broadband/phone coverage.**			
Summary: Measures to address poor coverage, including community private networks. This will facilitate greater reliability for those working and studying from home and improve reliability of information sharing between communities.	**Justification:** Patchy/Poor coverage in areas across the plan area.	**Centres:** Supporting Town/Village Centres/Parishes	**Linked Document:** Aberdeenshire Council Local Development Plan (2017), Proposed Aberdeenshire Local Development Plan (expected 2021).
8. Safer roads and active communities.			
Summary: Road safety measures including assessment of areas in greatest need of improvement, small scale works (lighting, signage, painting) to existing routes and works to ensure safety of walkers/cyclists.	**Justification:** The communities have identified a requirement for road/footpath/cycle path safety improvements and a shortfall in maintenance or provision of existing walking or cycling routes.	**Centres:** All Centres	**Linked Document**: Aberdeenshire Council Local Development Plan (2017), Proposed Aberdeenshire Local Development Plan (expected 2021). Nestrans Regional Transport Strategy (2013), Aberdeenshire Active Travel Action Plan.
9. Robust local tourism industry.			
Summary: Identification of tourism opportunities including the development of a tourism strategy, promotion of heritage and natural assets for tourists and the use of technology to create virtual attractions for	**Justification:** Falling visitor numbers and the closure of VisitScotland premises in Huntly. Improved promotion and development of cultural or natural heritage assets for rural communities will help address decline and extend links to wider Cairngorms markets	**Centres:** All Centres	**Linked Document:** Aberdeenshire Council Local Development Plan (2017), Proposed Aberdeenshire Local Development Plan (expected 2021).

tourists (e.g. digital heritage trail).	throughout the Clashindarroch II Area.		
10. Adaption and mitigation of the effects of climate change.			
Summary: Approaches to mitigate the impact of climate change, including home insulation, renewable energy schemes, micro hydro schemes and waste reduction. This also includes measures to prepare for the impacts of climate change with the creation of a Local Energy Action Plan.	**Justification:** There is a requirement to anticipate and address the impacts of climate change across Scotland in line with Scottish Government targets. Local actions are needed to help reduce climate impacts	**Centres:** All Centres	**Linked Document:** Aberdeenshire Council Local Development Plan (2017), Proposed Aberdeenshire Local Development Plan (expected 2021) Climate Change Plan: third report on proposals and policies 2018-2032) Scottish Government.

4.3 Actions

4.3.1 Consistent with the proposed strategic objectives, indicative accompanying community partnership actions are set out below:

Table 4.2 Strategic Priorities

Strategic Objective	Action	Indicative Timing	Economic Outcomes	Key Partners
1. Regeneration of town/village centres.	1. Identify town/ village centres suffering the greatest decline. Audit town centres to develop a programme of works to address shortfalls (i.e. road improvements, traffic management plans, public transport availability). 2. Identify centre vacancy rates. Approach owners re potential for temporary uses (e.g. flexible business space) and town events. Identify vacant land which could be repurposed for the community benefit (e.g. community allotment). 3. Undertake 'quick win' landscape & public realm improvements in centres earmarked for	Short Term (0-5 years)	- Temporary use of vacant space for start-up businesses may generate economic investment in physical business space. - Public realm improvements may encourage greater visitor numbers as part of wider regeneration works and increase length of stay/visitor spend. - Long term economic benefits via regeneration works to enhance vitality and viability of retail centre, attracting greater footfall. - Parking improvements may have implications for length of stay and visitor spend.	Aberdeenshire Council, Opportunity North East, Scotland's Towns Partnership.

Strategic Objective	Action	Indicative Timing	Economic Outcomes	Key Partners
	improvement (i.e. painting of street furniture).		- Opportunities to periodically identify and assess opportunities for local economic growth (e.g. advertisement of new business opportunities).	
	4. Landscape & public realm work as identified in programme of works. 5. Building improvements as identified in the programme of works. 6. Transport improvements e.g. collaboration with Aberdeenshire Council to undertake review of parking rules to encourage length of stay.	Medium Term (5-10 years)		
	7. Undertake town centre audits and improvements for places in greatest need and repeat periodically.	Long Term (15-20+ years)		
2. Community based action for a reduction in social isolation, impacts on wellbeing and gaps in health and social care provision.	1. Work with partners to identify areas with households experiencing isolation from services. 2. Undertake an evaluation of funding requirements to support rural communities with no centre. This may include community infrastructure needs. Use funds from SO for relevant funding applications.	Short Term (0-5 years)	- The use of funds to facilitate applications by staff/volunteers to external funding bodies. - Provision of employment opportunities within the social care enterprise. - Potential economic benefit in supplementing public services, enabling people to return to work or generate improvements to wellbeing.	Aberdeenshire Council, Aberdeenshire Health and Social Care Partnership
	3. Support existing or new social care enterprise to tackle social isolation with funding to facilitate health visits, transport to appointments or travelling mental health services. The social care enterprise may also supplement additional health care services which are not able to be taken up locally (e.g. difficulties	Medium Term (5-10 years)	- Funding used to provide volunteer placements at local businesses may provide training opportunities and enhance career prospects for local residents. It may also provide upskilling opportunities to fill local vacancies.	

Strategic Objective	Action	Indicative Timing	Economic Outcomes	Key Partners
	in reaching services due to poor public transport provision). 4. Empower local communities to volunteer and address the contributors to social isolation (e.g. private transport/car sharing to attend appointments).			
	5. Regular programme of support identified to support the most vulnerable communities.	Long Term (15-20+ years)		
3. Adequate provision of affordable/suitable housing* ***All actions should be undertaken in partnership with Aberdeenshire Council and all relevant local Housing Associations to ensure actions are in line with local and regional strategy.**	1. Identify areas of greatest housing need in collaboration with Aberdeenshire Council. Set up meetings with Aberdeenshire Council & registered social landlords to discuss proposals in line with local strategies (e.g. Aberdeen City and Shire Housing Need and Demand Assessment) to identify areas of greatest need e.g. accessible, affordable, family homes. 2. Identify examples of community developed affordable housing initiatives undertaken across Scotland (e.g. Highlands Small Communities Housing Trust). Contact them to learn from their strategy. 3. Review and ringfence funds for potential funding of improvements to existing housing where required (e.g. small grants).	Short Term (0-5 years)	- Funding for local housing upgrades (e.g. local heating systems) may encourage residents to remain and work in the area (retaining local spend) or encourage the inward migration of new residents (generate new local spend). - The development of a Housing Trust (or similar, working with local HAs and other providers) to enable strategic purchase of land with the aim of providing community led affordable housing. - The actions of the Trust will assist in retaining and attracting local residents (e.g. sustaining/increasing local spend). - The trust will also provide employment and educational placement opportunities for local	Aberdeenshire Council, Registered Social Landlords, Local Community Housing Trusts, Forestry Commission Scotland.

Strategic Objective	Action	Indicative Timing	Economic Outcomes	Key Partners
	4. Identify potential for local housing mechanism (trust or similar, working with or as an extension to local Housing Associations/Council): ○ Working closely with partners across Aberdeen City and Aberdeenshire. ○ Liaison with landowners to identify potential affordable housing opportunities; ○ Related funding applications; ○ Identify mechanisms to make land accessible at low cost; ○ Address areas of under occupancy; ○ Support self-build initiatives and empower local communities; ○ Support use of local skills and local building materials; ○ Promote employment opportunities for apprenticeships in management, construction etc.	Medium Term (5-10 years) Long Term (15-20+ years)	residents (e.g. business, marketing or construction). This could be carried out in conjunction with Aberdeenshire Council or local colleges	
4. Access to economic opportunities for all.	**All Ages** 1. Provide Opportunities for training schemes, work experience and apprenticeships during the construction of the wind farm and other associated works. 2. Identify local businesses willing to provide employment opportunities, upskilling and adult education for all. 3. Identify funding to launch training and learning opportunities digitally for those in more distant areas. 4. Establish local volunteering opportunities and CV workshops for those looking for work. 5. Identify funding stream in partnership with Aberdeenshire Council	Short Term (0-5 years) & ongoing	- Facilitation of education, training, employment or volunteering opportunities. - Opportunity to build local brand with frequent advertising of local economic opportunities with the aim of offering new or enhancing existing business opportunities. This may include partnership working with Aberdeen & Grampian Chamber of Commerce or local advertising of vacancies or properties via a bespoke website. - Match funding of placements in local businesses (potential to turn into long term employment contract).	Vattenfall, Aberdeenshire Council, Aberdeen & Grampian Chamber of Commerce, Local Businesses, Colleges & Universities.

Strategic Objective	Action	Indicative Timing	Economic Outcomes	Key Partners
	to enable funding for digital education opportunities for later life career changes. **Young People** 6. Provide Opportunities for training schemes, work experience and apprenticeships during the construction of the wind farm and other associated works. 7. Identify local businesses willing to provide training or work placement opportunities for young people on a temporary basis. 8. Identify funding to launch training and learning opportunities digitally for those in more distant areas. 9. Establish local volunteering opportunities and CV workshops for those looking for work. 10. Identify funding stream in partnership with Aberdeenshire Council to enable placement of young people in local businesses (e.g. full or partial payment of salary for placement). SO returns may also help to fund additional placements.		- Launch of digital learning and training opportunities for rural populations in partnership with educational institutions.	
	11. Identify opportunities for community funded transport/car sharing for regular access to training and employment opportunities.	Medium Term (5-10 years) & ongoing	- Enhanced journey reliability and time. Higher levels of productivity.	
5. Thriving community infrastructure.	1. Audit of community facilities (e.g. Village hall, school buildings & sports facilities) to develop scope of works required and the scale of need for each facility (i.e. structural	Short Term (0-5 years)	- The enhancement or creation of bookable community facilities may generate local employment opportunities and	Aberdeenshire Council

Strategic Objective	Action	Indicative Timing	Economic Outcomes	Key Partners
	improvements, kitchen facilities, sports facilities, IT equipment). 2. Identify sites with the greatest requirements and develop a programme of works. Identify planning requirements.		generate additional local income. - Improvements to community infrastructure may provide the necessary services not currently provided; this may attract new residents. - Frequent events can result in an uplift in local spend by residents, generate advertising revenue from local businesses, create employment/volunteering opportunities and attract visitors.	
	3. Building improvements carried out in order of greatest need. 4. Local events programme- building upon existing community events and identifying additional opportunities made possible by new facilities. Funding may be used to meet staffing, advertise for volunteer needs for local events or to facilitate regular funding applications to external funds.	Medium Term (5-10 years)		
	5. Ongoing maintenance and updating the programme of works for new and existing community facilities. 6. Ongoing programme of community events.	Long Term (15-20+ years)		
6. Accessible and frequent community transport.	1. Undertake a survey of community transport requirements including frequency, reliability and accessibility. Explore possibility of expansion of existing A2B dial-a-bus services with key partners. 2. In line with the Aberdeenshire Council Local Transport Strategy, work with key partners to identify opportunities to improve access to existing and new passenger transport, including	Short Term (0-5 years)	- Close the gap in the current provision of local transport, enabling reliable access to education and employment opportunities. - Creation of employment opportunities for drivers. Purchase and maintenance of vehicle/s will generate local spend.	Local transport companies, Aberdeenshire Council, Sustrans, Local Community Partnership

Strategic Objective	Action	Indicative Timing	Economic Outcomes	Key Partners
	private community transport. 3. Approach local transport companies to determine shortfalls in demand. 4. Identify funding requirements for employment opportunities for drivers, licensing requirements and develop funding plan to enable the sustainable provision of private transport. 5. Begin a local campaign to encourage greener modes of travel (e.g. car sharing). This may be achieved by the creation of a ride sharing app.		- Climate change mitigation outcomes (see objective 10).	
	5. Purchase an accessible vehicle. 6. Improvements to bus stops (e.g. shelters or signage) in conjunction with Aberdeenshire Council. 7. Create long term plan and identify funding requirements for the provision of private transport.	Medium Term (5-10 years)		
	8. Manage ongoing funding requirements for the provision of private community transport (e.g. addition of more routes, purchase of new vehicle if necessary).	Long Term (15-20+ years)		
7. Improved broadband/phone coverage.	1. Review ongoing programme of national/regional broadband upgrades including the Scottish Government Reaching 100% (R100) Programme launched in August 2019. Identify actions in line with the R100 and associated documents to support planned upgrades. 2. In areas with requirements for physical line upgrades,	Short Term (0-5 years)	- New opportunities for access to reliable digital education and online employment opportunities. - Access to reliable connection may increase productivity/output of those already working at home. - Upskilling opportunity from participation in private cable works.	Aberdeenshire Council, Private Network Developers, Scottish Rural Network

Strategic Objective	Action	Indicative Timing	Economic Outcomes	Key Partners
	review suitability for existing support schemes e.g. Rural Gigabit and the Better Broadband Voucher Schemes. Meet with key partners to discuss the potential opportunities for shared funding to install signal boosting equipment. This will link communities with faster, higher data allowance internet services and can enable supporting features (i.e. voice calling over Wi-Fi) to boost signal in rural areas. 3. Empower the local community by providing opportunities for upskilling to prepare to undertake private works (e.g. local cable network).			
	4. Undertake programme of works to install private network equipment where necessary.	Medium Term (5-10 years) Long Term (15-20+ years)		
8. Safer roads and active communities.	1. Undertake an assessment of the existing roads/paths in the area and identify any routes in greatest need of improvement. 2. Work with local partners (i.e. Aberdeenshire Council) to identify costings for improvement to elements along road and active travel routes including safety measures for existing cycling and walking routes (e.g. widening of roads & bridges and	Short Term (0-5 years)	- Improvements to safety of roads will contribute to overall resident and visitor experience. Likewise, improvements to signage on locally important walking or cycling routes may encourage repeat tourism visits. - Improvements to road, walk or cycle safety will improve quality of life for residents and facilitate access to education,	Aberdeenshire Council, Sustrans, Transport Scotland

Strategic Objective	Action	Indicative Timing	Economic Outcomes	Key Partners
	traffic calming measures). 3. Identify funding to implement small scale works to existing roads/routes (e.g. lighting, signage, painting). This may include local walking trails to encourage use of the land.		employment or training opportunities. - A reduction in road accidents due to safety enhancements to local road network, reducing personal costs and public service budgets (e.g. Police, NHS).	
	4. Work with local partners and identify funding to reinforce existing or establish a new local active travel hub (i.e. Active Travel Hub Ayr). This may offer free community bike rides, tutorials on bike repair and cycling proficiency.	Medium Term (5-10 years)		
	5. Ongoing improvements and creation of local active travel routes where required in alignment with scheduled road works by the authority.	Long Term (15-20+ years)		
9. Robust local tourism industry.	**Marketing** 1. Identify local tourism partners and arrange meeting to determine key brand points. 2. Initiate design of tourism strategy including the identification of key tourism assets and current shortfalls in the provision of tourism information (e.g. social media advertising). 3. Initial launch of campaign in the local press.	Short Term (0-5 years) & ongoing	- Creation of a tourism strategy in conjunction with Aberdeenshire Council and Visit Scotland could result in increased visitor numbers, spend and length of stay. - Publication and promotion of the strategy will enhance the profile of the area, including spend on media advertising across the region and Scotland. - Wider economic benefit from increased tourism numbers including spend on transport and accommodation.	Aberdeenshire Council, Opportunity North East, Visit Scotland, Local Businesses
	Tourism 1. Undertake an audit of local tourism businesses (i.e. activity centres, museums, accommodation providers, heritage,	Short Term (0-5 years)		

Strategic Objective	Action	Indicative Timing	Economic Outcomes	Key Partners
	shops and other visitor attractions to identify the level of investment required to improve the tourism offering and increase visitor numbers. 2. Creation of a new tourism website to highlight the tourism offering within the area using funds for launches in the press, social media advertising and local advertising. 3. Empower communities to take pride in their local area to develop better local facilities for locals and subsequently increase the areas attraction to tourists (e.g. enhancements to signage, maintenance of key viewpoints and development of local walking/music festivals).			
	4. Identify ways to supplement the existing tourism offering including physical or digital heritage or nature trails. This may take the physical or digital form including apps for phones and demonstrate the unique heritage of the local area.	Medium Term (5-10 years) & ongoing		
10. Adaption and mitigation of the effects of Climate Change.	1. Identify key partners to address expected impacts from climate change (i.e. building damage from bad weather, transport impacts) and initiate formation of objectives to include in a local strategy. 2. Identify immediate local actions to reduce	Short Term (0-5 years)	- Using resources for the mitigation and adaptation to climate change may result in a reduction in spend by public services in response to weather events and local economic impact (e.g. flooding damage, agricultural productivity and occupational health spend etc).	All partners

Strategic Objective	Action	Indicative Timing	Economic Outcomes	Key Partners
	impacts on the environment (e.g. use of existing materials like waste wood). 3. Explore climate change mitigation methods (e.g. insulation, use of home renewables, expansion of existing micro hydro schemes in the area).		- Wider environmental benefits for local biodiversity.	
	4. Ringfence funding for a social enterprise (e.g. community heating scheme utilising left over materials from Forestry Commission Scotland and private foresters) 5. Creation and Publication of Local Energy Action Plan. 6. Implement actions from Local Energy Action Plan.	Medium term (5-10 years)		
	7. Review and update Local Energy Action Plan in response to new challenges.	Long Term (15-20+ years)		

4.4 Governance Structure

4.4.1 Initial discussions indicate Shared Ownership at Clashindarroch II will be progressed through collaboration of Huntly District & Development Trust (HDDT) and Marr Area Partnership (MAP).

4.4.2 Any shared ownership agreement will be formalised following wind farm construction. MAP and HDDT have agreed that the funds will be geographically ringfenced over the agreed Clashindarroch II Area. MAP have also outlined a commitment to target their proportion of the funds to areas of significant need with access to no other revenue streams.

4.5 Net Economic Benefit

4.5.1 The development of Clashindarroch II will enhance the existing 36MW Clashindarroch I wind farm, which is comprised of 18 turbines. The proposed development will add up to a further 14 turbines, with a maximum tip height of 180m.

4.5.2 This section examines the potential net economic impact generated by the proposed development. Communities will benefit through both community benefit funding and revenue generated from shared ownership. These are discussed in turn:

Community Benefit Funding

4.5.3 The Clashindarroch Community Fund is provided by Vattenfall and generates around £185,000 per annum. This was calculated using Scottish Government recommendations[8] (2013) for community benefit funding up to £5,000/MW per annum, index linked for the operational lifetime of the project.

4.5.4 On 8th May 2019, the guidance was reviewed and published by the Scottish Government[9], retaining the recommendation of community benefit package up to the value of £5,000 per installed per MW per annum, again index linked for the operational lifetime of the project. However, the guidance also outlines flexibility for renewable energy businesses to consider a variety of options or community benefits packages they may be able to offer, including scope for direct funding of projects identified by the community.

4.5.5 For the purposes of this calculation of net economic benefit throughout this section, a community benefit package to the rate of £5,000 per MW per annum has been assumed. The community benefits package will be confirmed post planning.

4.5.6 Clashindarroch II is estimated to generate between 55-85 MW per annum. An indication of related potential community benefit value is provided in **Table 4.3**.

Table 4.3 Estimated Community Benefit Generation

MW Estimation	55 MW	60 MW	65 MW	70 MW	75 MW	80 MW	85MW
Annual Community Benefit value generated per annum index linked for the expected life of the windfarm	£275,000	£300,000	£325,000	£350,000	£375,000	£400,000	£425,000

Shared Ownership

4.5.7 In addition to community benefit funding, a shared ownership proposition has been developed by Vattenfall. At present Vattenfall have offered a shared revenue model, whereby community bodies purchase a defined percentage of revenues or net revenues (after development, operating costs and, if relevant, any acquisition premium). The revenue will potentially provide a strategic opportunity for sustainable community development.

4.5.8 The amount payable will be calculated post-commercial operation of Clashindarroch II. For the purposes of this report, it is assumed that up to 5% of annual revenue will be offered to the community. This will be in addition to the proposed community benefit package and will provide a strategic opportunity to achieve the objectives in **Section 4.2-4.3.**

4.5.9 The structure of the community vehicle and terms associated with community acquisition of a project interest have yet to be agreed. Potential sources of community funding for related equity include private fund raising, use of the existing Clashindarroch I, potential Clashindarroch II Community Fund and other sources.

[8] Scottish Government Good Practice Principles for Community Benefits from Onshore Renewable Energy Developments (2013) https://www2.gov.scot/resource/0043/00438782.pdf

[9] Scottish Government Good Practice Principles for Community Benefits from Onshore Renewable Energy Developments (2019) https://www.gov.scot/publications/scottish-government-good-practice-principles-community-benefits-onshore-renewable-energy-developments/

Summary of Wider Socio-economic Benefits

4.5.10 Access to both the revenue and the community benefit funds will have a number of local and wider socio-economic benefits for communities in the Clashindarroch II Area, including:

- Funds used to purchase local products or services can increase business revenue and facilitate business growth; including the creation of new employment opportunities. This may also result in the creation of educational, training or volunteer opportunities;
- Enable partnerships to be built with key local stakeholders to achieve strategic objectives by enabling the community bodies to participate in schemes such as match funding;
- Bridge gaps in local or national funds to meet the specific requirements of rural communities in Aberdeenshire;
- Generate wider socioeconomic benefits across the region for transport and tourism accommodation providers and local businesses including the construction or renovation of housing;
- Improvements in wellbeing achieved by addressing issues (e.g. social isolation caused by a lack of community transport to reach employment or educational opportunities); and
- Provide funds to capture strategic opportunities for growth to meet local needs over the next 20-30 years.

4.5.11 To calculate Clashindarroch II's wider economic benefit project, forecast Clashindarroch II Community Funds have been allocated to each strategic objective. The proportion of funding allocated is informed by a review of the grant applications for the Clashindarroch Community Fund since 2015 and following the community consultation in development of this strategy. Tables 4.4-4.7 below identifies the potential wider economic impact, calculated using the Scottish Governments recommendation of £5,000 per MW per annum.

4.5.12 Four scenarios have been modelled for the Community Benefit Funding:

- 55MW – Yielding £275,000 per annum;
- 65MW – Yielding £325,000 per annum;
- 75MW – Yielding £375,000 per annum; and
- 85MW – Yielding £425,000 per annum.

4.5.13 The increases in related outputs from the strategy's implementation is estimated to range between 22% to 46% above the wider economic impact of the Community Benefits Funding. The 22% additional benefit is a result of the shared ownership yielding 4% of revenues to the community, and the 46% increase in benefit equates to the community's shared ownership of 5% of the windfarm revenues. These are noted in the tables as SO + 22% and SO + 46%. **Table 4.4** and **Table 4.5** indicate the potential economic benefits from the Community Benefit Funding, and the +22% and +46% uplift from the shared ownership of revenues.

4.5.14 In the absence of detailed information regarding the level of finance available to community organisations, it is difficult to establish potential net revenues available to HDDT and other community organisations flowing from shared ownership, i.e. the balance of investing between existing reserves and borrowings needed to purchase shared ownership equity, and the timing and scale of revenue flows from shared ownership. We have assumed a high proportion of revenues flowing from shared ownership will be available to support the community strategy (rather than fund borrowing).

4.5.15 A number of additionality assumptions[10] have been used to calculate the wider economic benefit, including:

- **Leakage**: This refers to the proportion of the outputs that benefit those outside of the Clashindarroch II Area (i.e. people working in construction which live outside of the area). Overall leakage is expected to be low, as the activities will be focused locally. Construction employment is likely to be the most affected by leakage, as the baseline demonstrates a relatively small construction labour force in the area. Large or specialised works may also require sourcing labour or equipment from outside the Clashindarroch II Area;

- **Displacement:** This refers to the economic benefit which is available as a result of the reduction in benefits in other parts of the local area. Displacement is not considered likely because the existing community benefit funding from Clashindarroch is committed over the lifetime of the project, and the development of Clashindarroch II will provide additional funding; and

- **Deadweight:** This is a measure of the economic activity which would take place regardless of the additional community benefit funding. As Clashindarroch currently provides around £185,000 per year, this represents funding which will still be available should Clashindarroch II not receive consent, and therefore the wider economic benefits which could be achieved by leveraging this funding would be the deadweight.

4.5.16 Expenditure from the Clashindarroch II Community Fund will support employment across the area. A calculation of employment potential can be developed from this expenditure using sector average £ per employee figures. Using this method, the estimate of jobs supported (gross and net[11]) over a 5-year period is shown in **Table 4.4.**

Table 4.4 Employment Supported (5-years)

	55MW			65MW			75MW			85MW		
	CB	SO + 22%	SO + 46%	CB	SO + 22%	SO + 46%	CB	SO + 22%	SO + 46%	CB	SO + 22%	SO + 46%
Gross	17.6	18.5	20.2	20.8	21.8	23.9	24.0	25.2	27.6	27.2	28.5	31.2
Net	5.8	6.1	6.7	8.4	8.8	9.6	10.9	11.4	12.5	12.3	12.9	14.2

4.5.17 Again, using the income method, anticipated employment effects over the 30-year operational period are shown below in **Table 4.5**.

Table 4.5 Employment Supported (30-years)

	55MW			65MW			75MW			85MW		
	CB	SO + 22%	SO + 46%	CB	SO + 22%	SO + 46%	CB	SO + 22%	SO + 46%	CB	SO + 22%	SO + 46%
Gross	105.5	110.7	121.3	124.6	130.9	143.3	143.8	151.0	165.4	163.0	171.1	187.4
Net	34.8	36.5	40.0	50.3	52.8	57.9	65.2	68.4	75.0	73.9	77.6	84.9

[10] The additionality assumptions are as follows: Leakage (15%) Displacement (0%) and Deadweight (60%, 51% and 45% based on the level of community benefit funding).

[11] Gross jobs are the total jobs supported by expenditure of the Community Benefit Funding. Net jobs are adjusted for additionality.

4.5.18 It should be noted that expenditure from the Clashindarroch II Community Benefit Fund is unlikely to be invested exclusively on employment creating activities, and therefore the estimates are likely to overestimate the employment benefits.

4.5.19 A capacity-based approach examines the potential deliverables achievable through the Clashindarroch II Community Benefit Fund and revenues from shared ownership. The deliverables have been informed by the Strategy Objectives and are necessarily indicative, pending development of an agreed programme.

4.5.20 The potential deliverable benefits for communities in the Clashindarroch II Area over a 5-year operational period are shown in the table below.

Table 4.6 5-Year Possibilities

5-Year Possibilities													
		55MW			65MW			75MW			85MW		
		CB	SO + 22%	SO + 46%	CB	SO + 22%	SO + 46%	CB	SO + 22%	SO + 46%	CB	SO + 22%	SO + 46%
Access to Economic Opportunities	Office Space (m2)	90	110	131	105	128	153	120	147	176	130	158	189
	Units	4	5	7	5	6	8	6	7	9	6	8	9
	Employment Capacity	2.0	2.5	3.0	2.9	3.6	4.3	3.8	4.6	5.5	4.0	4.9	5.9
Thriving Community Infrastructure	General Purpose Hall (m2)	52	64	77	61	75	90	70	86	103	76	92	110
	Employment Capacity	0.6	0.7	0.9	0.9	1.0	1.2	1.1	1.3	1.6	1.2	1.4	1.7
Robust Local Tourism Industry	Tourism Facility (m2)	62	76	91	73	89	106	83	102	122	90	109	131
	Employment Capacity	0.7	0.9	1.0	1.0	1.2	1.5	1.3	1.6	1.9	1.4	1.7	2.0
Safer Roads and Communities	Rural road (m)	222	271	324	260	317	379	297	363	434	320	391	468
	Guardrails (km)	3.8	4.7	5.6	4.5	5.5	6.6	5.1	6.2	7.5	5.5	6.7	8.1
Purchase of Land for housing	Acres	2.44	2.98	3.57	2.86	3.49	4.17	3.27	3.99	4.78	3.52	4.30	5.14
	Hectares	1.0	1.2	1.4	1.2	1.4	1.7	1.3	1.6	1.9	1.4	1.7	2.1
	Potential Units	18	22	26	21	25	30	24	29	35	26	31	37
Public Realm Improvements	General Sports Field (hectares)	4.6	5.6	6.7	5.4	6.5	7.8	6.1	7.5	9.0	6.6	8.1	9.7
	Shrubbed Planting (m2)	1886	2301	2754	2206	2692	3221	2526	3082	3688	2721	3319	3972
	Slab Paving (m2)	1861	2270	2717	2176	2655	3178	2492	3040	3639	2684	3274	3918
Improved Broadband/Phone Coverage	Premises Connected	50	61	73	59	72	86	67	82	98	72	88	106
Adaptation/Mitigation of Climate Change	Rehab/Conversion - flats	17	21	25	20	24	29	23	27	33	24	30	35
	Rehab/Conversion - det. Homes	11	13	15	12	15	18	14	17	21	15	19	22
	Rehab/Conversion - semi det. Homes	21	25	30	24	30	36	28	34	41	30	37	44
Accessible and Frequent Transport	Buses (units)	2	2	2	2	2	3	3	4	4	3	4	4

5-Year Possibilities													
		55MW			65MW			75MW			85MW		
		CB	SO + 22%	SO + 46%	CB	SO + 22%	SO + 46%	CB	SO + 22%	SO + 46%	CB	SO + 22%	SO + 46%
Community Based Action for reduction in social isolation	Carer/Social Worker (FTE/annum)	1.0	1.2	1.5	1.1	1.4	1.6	1.3	1.6	1.9	1.5	1.8	2.1
Total Floorspace		204	249	299	239	292	349	274	334	400	295	360	431
Total Employment		7	8	8	8	10	12	10	13	15	11	14	16

4.5.21 Similarly, the wider economic benefit for communities in the Clashindarroch II Area over the operational life of the wind farm has been calculated and is shown in **Table 4.7** below.

Table 4.7 30-Year Possibilities

30-Year Possibilities													
		55MW			65MW			75MW			85MW		
		CB	SO + 22%	SO + 46%	CB	SO + 22%	SO + 46%	CB	SO + 22%	SO + 46%	CB	SO + 22%	SO + 46%
Access to Economic Opportunities	Office Space (m2)	371	456	513	433	532	603	495	608	694	528	648	770
	Units	19	23	26	22	27	30	25	30	35	26	32	39
	Employment Capacity	8.4	8.4	12.7	16.0	9.8	14.8	18.8	11.2	16.9	21.6	12.0	18.0
Thriving Community Infrastructure	General Purpose Hall (m2)	217	266	299	253	311	352	289	355	405	308	378	450
	Employment Capacity	2.5	2.5	3.7	4.7	2.9	4.3	5.5	3.3	4.9	6.3	3.5	5.3
Robust Local Tourism Industry	Tourism Facility (m2)	257	316	355	300	368	418	343	421	480	365	449	533
	Employment Capacity	2.9	4.4	5.5	3.4	5.1	6.5	3.9	5.8	7.5	4.1	6.2	8.3
Safer Roads and Communities	Rural road (m)	917	1127	1267	1071	1315	1491	1224	1504	1715	1305	1602	1904
	Guardrails (km)	15.8	19.4	21.8	18.4	22.7	25.7	21.1	25.9	29.5	22.5	27.6	32.8
Purchase of Land for housing	Acres	10.1	12.4	13.9	11.8	14.5	16.4	13.5	16.5	18.9	14.4	17.6	20.9
	Hectares	4.1	5.0	5.6	4.8	5.9	6.6	5.4	6.7	7.6	5.8	7.1	8.5
	Potential Units	73	90	102	86	105	119	98	121	137	105	128	153
Public Realm Improvements	General Sports Field (hectares)	19.0	23.3	26.2	22.1	27.2	30.8	25.3	31.1	35.4	27.0	33.1	39.3
	Shrubbed Planting (m2)	7789	9570	10762	9092	11171	12664	10396	12772	14567	11082	13607	16170
	Slab Paving (m2)	7683	9441	10617	8970	11020	12493	10256	12599	14370	10933	13423	15951
Improved Broadband/Phone Coverage	Premises Connected	207	254	286	242	297	337	276	339	387	295	362	430
Adaptation/Mitigation of Climate Change	Rehab/Conversion - flats	69	85	96	81	100	113	93	114	130	99	121	144
	Rehab/Conversion - det. Homes	43	53	60	51	62	71	58	71	81	62	76	90
	Rehab/Conversion - semi det. Homes	86	106	119	100	123	140	115	141	161	122	150	179

30-Year Possibilities													
		55MW			65MW			75MW			85MW		
		CB	SO + 22%	SO + 46%	CB	SO + 22%	SO + 46%	CB	SO + 22%	SO + 46%	CB	SO + 22%	SO + 46%
Accessible and Frequent Transport	Buses (units)	2	2	2	2	2	2	3	3	3	3	3	3
Community Based Action for reduction in social isolation	Carer/Social Worker (FTE/annum)	0.9	1.2	1.4	1.1	1.4	1.7	1.3	1.6	1.9	1.4	1.8	2.1
Total Floorspace		844	1038	1167	986	1211	1373	1127	1385	1579	1201	1475	1753
Total Employment		17	24	30	19	28	34	23	32	40	24	34	44

4.6 Summary

4.6.1 The assumptions above allow an estimate of the scale of net economic benefit achieved by Community Benefit/Shared Ownership investment.

4.6.2 Over the lifetime of the windfarm, the scale and nature of impacts across the Clashindarroch II may extend to:

- Support 24-44 employment opportunities;
- Delivery of 1040-1750m^2 floorspace:
  - c. 460-770m^2 managed office space;
  - c. 270-450m^2 general-purpose community hall to host community functions and events;
  - c. 320-530m^2 tourism space to celebrate local heritage and culture;
- Purchase of c. 12-21 acres which could accommodate some 150 houses;
- Connecting c. 250-430 households or businesses to broadband;
- Building 1130-1900m of new rural road;
- Rehabilitation of 50-180m^2 residential properties;
- Delivery of c. 9,500-16,000m^2 of public realm improvements (i.e. new planting & paving);
- Purchase of 2-3 minibuses to provide additional mobility options; and
- Support 1-2 Social Worker/Carer per annum to address issues of social isolation;

4.7 Next Steps

4.7.1 Vattenfall wants to help communities to benefit from Clashindarroch II by offering an opportunity for shared ownership.

4.7.2 For Clashindarroch communities, shared ownership can provide a strategic opportunity to address the issues discussed throughout this strategy. The economic benefit of the community benefit investment made possible by the Clashindarroch II may be measured by the following indicators:

- A reduction in vacancy and physical improvements to the vitality of town centres which meet the needs of the local population;
- A measurable reduction in local poverty and social isolation in rural settlements via community enterprise;
- Enhancement and creation of housing suitable for local needs;
- Higher levels of youth employment within the area and more opportunities for later life career change;
- Reduction in distance/journey times for business or leisure due to the provision of private community transport;
- Economic growth attributable to the provision of better broadband/phone coverage;
- A reduction in road accidents due to enhancements to local road network;
- Enhanced tourism spend, visitor numbers and length of stay; and
- Potential cost saving and environmental benefits from the update of climate change mitigation methods.

4.7.3 The Clashindarroch II Community Partnership Strategy provides strategic objectives to tackle long standing issues and how they can be addressed by the revenue provided from the development of Clashindarroch II. The combination of the Clashindarroch II Community Fund and the revenue generated from shared ownership will provide a means to implement the actions identified in this strategy over the lifetime of the windfarm (20+ years), bringing significant investment to the area. The Strategy represents an opportunity to help address long-standing local issues and take a strategic approach to encourage the sustainable economic and population growth of the communities in the Clashindarroch II Area.

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Appendix A Community Action Plans

A.1 Community Action Plans (CAP)

A.1.1 This section will set out the issues identified in the CAP review which informed this strategy. Each CAP is accompanied by a table, identifying the issues within the local community and setting out how the objectives within the Clashindarroch II Area Strategy can respond to local issues.

A.1.2 The strategic objectives are numbered as follows:

1. Regeneration of Town/Village Centres;
2. Community based action for a reduction in social isolation, impacts on wellbeing and gaps in health and social care provision;
3. Adequate provision of affordable/suitable housing;
4. Access to economic opportunities for all;
5. Thriving Community Infrastructure;
6. Accessible and frequent community transport;
7. Improved Broadband/Phone Coverage throughout the rural area;
8. Safer roads and active communities;
9. Robust local tourism industry; and
10. Adaption and mitigation of the effects of Climate Change.

A.1.3 The following section will provide an overview of each relevant CAP reviewed to inform this strategy. The CAPs which have been reviewed are within the Clashindarroch II Area, described in **Section 2.2**. The Clashindarroch II Area Strategy provides an opportunity to address the issues identified in the action plan and adopts a strategic approach for the use of the community benefit funding and the revenue generated.

Aberchirder (2015)

A.1.4 The Aberchirder CAP was developed by Banffshire Partnership Ltd following a programme of community engagement. Aberchirder is located in the north of the HDDT area, approximately 12 miles north east of Huntly.

Theme	Summary	How it is addressed in the Clashindarroch Community Partnership Strategy (Strategic Objective number)
Buildings & the Physical Environment	Renovate run down/derelict buildings. Create community energy efficiency scheme and community allotments. Publicise local heritage of the town. Modernise waste collection facilities.	1, 5,9,10
Community Activities	The community are in need of a sports/community hall. Other community facilities in demand are the expansion of the library, development of vacant land for the community, establishment of play facilities and the creation of a community museum/centre with storage facilities. Recreational opportunities for all. Create a village website/map.	1,4,5
Roads, Paths & Transportation	Establish cycle paths and a rural paths network to promote health. Improvements to road and footpath/ cycle path safety. Establish a community transport service.	2,6,8
Crime & Safety	Traffic calming measures including speed restrictions and parking. Improvements to safety for school children and parents.	5,8
Health & Housing	Promotion of active travel. Cleanliness of community spaces. Provision of housing for pensioners and first-time buyers.	1,3, 8,10
Jobs & the Economy	Encourage businesses of all sizes to the area, including niche stores. Establish a community shop/coffee shop/ health shop Relocate existing Co-op to larger premises.	1,2,4,5,7,9

The Cabrach

A.1.5 The Cabrach Trust covers the area of the Cabrach comprising Inverharroch Farm and 170 acres of land. The Cabrach is adjacent to the border of Tap o' Noth and Donside Community Council but lies within Dufftown & District Community Council in the Moray Council area. In partnership with The Cabrach Community Association, the Trust also acquired the Old School and Hall in The Lower Cabrach.

A.1.6 The Cabrach has been included because it is within the area of benefit for the current Clashindarroch Community Fund and is in a position to benefit from the expansion of the wind farm. There is no community action plan available for The Cabrach. However, The Cabrach Trust have identified a number of issues, including:

- **Falling population**: There are only around 70 people left living in the Cabrach. This has impacted local services dramatically, with the primary school at risk of closure;
- **Regeneration**: The Trust seeks to establish a new £6.5m Cabrach Distillery and Heritage Centre to attract and engage visitors, and to revitalise The Cabrach community. It will create jobs, increase visitor numbers and protect the cultural heritage of the area. A programme of events has been planned for the area for community consultation, launch events and beyond; and
- **Economic Growth**: The area is suffering from declining local population and associated spend. The Trust will use the regeneration of The Cabrach to reinvest profits to encourage future economic growth for the area.

A.1.7 The Clashindarroch Community Partnership Strategy identifies actions to address the issues found in the Cabrach. The Partnership working approach to provide economic opportunity for people of all ages can address the falling local population. Improvements to broadband and mobile connections may also enable more people to work and study from home. The strategy also identifies a number of opportunities to boost visitor numbers and spend, while also reinforcing community infrastructure in the area.

Gartly (2016)

A.1.8 The Gartly CAP was prepared in partnership between Aberdeenshire Community Planning Partnership and Marr Area Partnership. Gartly is approx. 5 miles south of Huntly and in close proximity to the Clashindarroch Wind Farm.

Theme	Summary	How it is addressed in the Clashindarroch Community Partnership Strategy (Strategic Objective number)
Recreation, Cultural and Social Life	Develop and support an annual events programme. Support community groups and projects, including the creation of 'pop up' community facilities. Generate volunteer opportunities.	2,5,9
Assets and Facilities	Update or provide community infrastructure fit for local needs. Investment in community revenue raising opportunities e.g. renewable energies. Enhancement of natural heritage assets for use by the community.	1,10
Local Communication	Improved information sharing between community groups and for visitors. Information gathering from out with the community.	5,7
Telecommunication	Improved broadband provision from upgrades to infrastructure.	7
Transport and Infrastructure	Road safety improvements to main and surrounding roads required including safety upgrades, upgrades to bus stop facilities and signage and the development of foot and cycle paths.	1,6,8

Theme	Summary	How it is addressed in the Clashindarroch Community Partnership Strategy (Strategic Objective number)
Environment	Visual improvements to local environment e.g. litter picking. Management and protection of biodiversity assets. Promotion of local natural heritage assets for tourists.	1,9,10
Housing, Health and Education	Meet local housing needs with sufficient housing for rent or sale to match demand. Energy efficient housing. Provision of retirement housing. Establish group to meet local healthcare needs. Adult education opportunities.	1,2,3,4

Glenkindie & Towie (2019)

A.1.9 The Glenkindie & Towie CAP was prepared by a Steering Group comprised of full members of the Glenkindie & Towie Community Group. Both settlements are located in the parish of Towie, adjacent to a large meander in the River Don.

Theme	Summary	How it is addressed in the Clashindarroch Community Partnership Strategy
Getting Around	Address current lack of public transport. No public transport serving the community. Requirement for younger population to access transport outside of term time for extracurricular activities. Lack of dedicated walking/cycling paths (one linking the two main settlements would be desired). Existing paths in poor condition or provide inadequate access. Improvements to road maintenance schedule and works.	6,8,10
Getting Connected	Improvements to Broadband and mobile service provision Improvements to consultations between communities including a community notice board.	5,7
Activities & Facilities	Provision/upgrade of community facilities to meet demand including the creation of volunteering opportunities to support this. The lack of local facilities has contributed to social isolation.	2,5

Howe of Alford (2018)

A.1.10 The Howe of Alford CAP was developed by a Steering Group supported by Donside Community Council and comprises the village of Alford and the communities of Tough, and Keig to the East, Montgarrie and Tullynessle to the North and, to the South, Cushnie, Muir of Fowlis and Craigievar. The communities covered by the CAP are located in the most southern portion of the Clashindarroch II Area.

Theme	Summary	How it is addressed in the Clashindarroch Community Partnership Strategy (Strategic Objective number)
Alford Community Campus	Strong demand for bookable sports facilities and improvements to access issues. Improvement to transport links to the campus from Alford & surrounding area. Make the facilities accessible to all.	5,6,7,8
Transport Recreation and Leisure	High vehicle ownerships paired with poor road conditions and speeding is an issue on the roads surrounding the area. A number of improvements are proposed, including Traffic control with speed restrictions, improved public transport within the Howe and links to other areas and safety of road users.	6,8
Community Health, Well-being and Social Care	Lack of expansion of crucial services in line with population growth. Requirement for a health and social care policy. Community Care initiatives such as sheltered housing, day centre and a befriending service. Road safety improvements including speeding restrictions.	2,4,8
Sports and Recreation Facilities	Improvements and ongoing maintenance required for existing facilities inc. paths, tracks and facilities in Haughton Park including delivery of ongoing community projects.	5,8,9
Alford Village Amenities	Declining shops, banks and businesses in the Alford Area with poor signage and publicity and facilities such as parking. Key actions include aesthetic improvements, car parking facilities and to re-develop Haughton Park.	1,5,9,10
Housing, Domestic Services and Telecommunications	Improvements to waste management facilities and telecommunications facilities specifically broadband	1,3

Theme	Summary	How it is addressed in the Clashindarroch Community Partnership Strategy (Strategic Objective number)
	speeds and public access wi-fi at the Alford Community Campus. Publication of new housing strategy to respond to local pressures.	

Huntly (2019)

A.1.11 The Huntly Room to Thrive Strategy was published by the 'Huntly Town Team' made up of a number of key local stakeholders. It is the key market town within the Clashindarroch II Area, with approx. 4,800 residents and 7,100 people living nearby[12].

Theme	Summary	How it is addressed in the Clashindarroch Community Partnership Strategy (Strategic Objective number)
A town centre that belongs to us	Community control of town centre buildings to enable community and business uses. Modernisation of town centre, making it easy to get around. Enhance vitality of town centre by bringing new activity and purpose to Huntly. Partnership working to achieve Huntly's goals.	1, 2,5,6,8,9,10
A campus for learning and play	Unlock the potential of north Huntly (extending north from the Square to the boundaries of the Deveron and Bogie rivers) by creating a town centre campus for learning and leisure facilities. Income generating facility for use by both the local community and visitors.	1,2,3,4,5,9
A rural place with transport that works for us	Improvements in the range, quantity and quality of active travel routes. Issues with public transport provision that meets the needs of residents and visitors. Ensure as much local benefit as possible from the new A96.	6,8

[12] Huntly Room to Thrive Strategy (2019)

Theme	Summary	How it is addressed in the Clashindarroch Community Partnership Strategy (Strategic Objective number)
The focus is people, environment and culture	Make use of local tools to market Huntly as a place to work and live. Empower the local community to use their resources to host local social events to encourage social inclusion. Provide start up space for new enterprises. Manage and mitigate potential impacts from climate change.	2,4,5,10
Where real opportunities exist for enterprise	Ensure existing and new enterprises complement each other to sustain footfall. Generate local brand. Provide upskilling opportunities, temporary start up spaces, and support for new enterprises. Develop lifelong learning opportunities within existing organisations, services and local businesses to increase the towns collective skills base and capacity to apply these to enterprises.	1,2,4

Marr Local Community Plan 2016-2019 (2016)

A.1.12 The Marr Local Community Plan was developed in partnership with the Marr Area Committee, community planning partners (including Marr Area Partnership) and other community representatives. It describes five priorities developed to guide the development of the area over the next three years.

Theme	Summary	How it is addressed in the Clashindarroch Community Partnership Strategy (Strategic Objective number)
Empowered and Confident Communities.	Increase youth engagement and involvement in the community planning process. A commitment to work with community groups to improve representation and involvement in the community planning process. Provide upskilling opportunities and support to communities and community councils.	1,2,4

Theme	Summary	How it is addressed in the Clashindarroch Community Partnership Strategy (Strategic Objective number)
	Empower local communities to develop and deliver a vision for their local area, and to understand and participate in opportunities to take advantage of legislative changes.	
Economically Vibrant Communities	Regeneration/revitalisation of town or village centres assisted by partnership working with communities. Involve communities in the assessment of need for local affordable housing/ delivery of community-based housing opportunities. Provide support for small scale tourism infrastructure across Marr. Empower and support communities to develop community-based enterprises and to develop/enhance their facilities. Support for communities for funding advice as well as providing funding for inclusive/sustainable projects.	1,2,3,4,5,9
Healthy, Safe and Thriving Communities	Support people to be actively engaged in local communities. Empower local people to reduce social isolation and improve health and wellbeing. Support for initiatives which promote healthy choices such as the reduction of alcohol consumption. Work with communities to identify gaps in local health & social care provision. Support for development of partnership led solutions. Support for initiatives for the safety and security residents of Marr including partnership working to resolve rural road safety issues.	2,5,8
Connected Communities	Work with communities to improve and expand local active travel routes. Assistance in developing locally led solutions to address gaps in public transport provision. Partnership working for the promotion of walking and cycling. Work with communities to assess areas requiring improvements to broadband and phone coverage.	6,7,8,10

Theme	Summary	How it is addressed in the Clashindarroch Community Partnership Strategy (Strategic Objective number)
Natural Heritage and Environment	Support for local communities to develop flooding and resilience plans Support for community projects incorporating climate change adaptation and mitigation. Work with communities to understand and benefit from the natural heritage and environmental assets in their area, supporting them to engage in discussions around its management. Support and encouragement for communities to engage more broadly in the management of natural assets.	10

Strathdon (2016)

A.1.13 The Strathdon Community Action Plan was developed in collaboration with Marr Area Partnership, Aberdeenshire Community Planning Partnership and the Strathdon Area Community. Strathdon is located to the south-west of the Clashindarroch II Area, adjacent to the River Don.

Theme	Summary	How it is addressed in the Clashindarroch Community Partnership Strategy (Strategic Objective number)
Recreation and Social Life	Support established and emerging groups to expand activities to meet local needs. Greater support for the establishment or improvement of youth groups including all-access facilities. Support for village halls and other community facilities, for both established and new activities.	2,5
Assets and Facilities	Protection and expansion of community facilities. Protection of local assets from closure or decline. Feasibility studies for new community facilities, particularly sport. Promotion of local heritage assets.	1,2,4,5,9,10

Theme	Summary	How it is addressed in the Clashindarroch Community Partnership Strategy (Strategic Objective number)
	Participation in community revenue raising; including social enterprise, tourism or small-scale renewables project.	
Local attractions and tourism	Promote Upper Donside as a visitor's destination. Develop and support heritage projects. Enhancement/promotion of pathways currently underused by visitors and residents. Ensure the sustainability and quality of local service industry. Support emerging attractions.	4,8,9
Employment, business training and education	Greater employment and business opportunities to retain young people in the area. Improvements to broadband and business infrastructure including tacking availability of business premises. Support for established, emerging and new businesses Concern about impact of land reform and other legislation on established land industries (e.g. farming and sporting estates).	1,4,7
Access, Infrastructure and Transport	Lack of public transport options throughout the area. What is there is very limited. No access to larger settlements in the evening or during working hours for those without cars. Improvements to footpaths and cycle paths, especially those linking settlements. Improvements to signage, access to fuel and road closure signage/approach. Poor bus links for those wishing to visit the area.	6,8
Telecommunication	Poor broadband provision (low speed in villages, inadequate service from service providers and no access to some areas). Mobile phone signal also poor.	7
Local Communication	Improved sharing of information for business, tourist's groups and activities.	1,2

Theme	Summary	How it is addressed in the Clashindarroch Community Partnership Strategy (Strategic Objective number)
	Improved assimilation of information from out with the community, including available support and services. Initiate actions from CAP.	
Environment	Protection, management and promotion of environmental assets, including biodiversity, fishing and forestry. Litter picking done on a volunteer basis and unsupported. Sensitive relationships around land use issues between land industries and other residents in some areas. Work with management to develop and sign paths.	10
Housing and resident support	Ensure there is efficient housing for rent or sale at affordable prices to match demand. Upgrades to existing private renting stock are required to ensure they are in an appropriate condition, including energy efficiency and related fuel costs. Consider alternative solutions. Health and social care initiatives at home and in the community. Help to ensure people can stay in their home.	2,3,5

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