



Planning Statement

Aultmore Wind Farm Redesign

Vattenfall Wind Power Ltd.

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Basis of Report

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Executive Summary

This Planning Statement has been prepared by SLR Consulting Ltd on behalf of Vattenfall Wind Power Ltd ('the Applicant') to support an application submitted under section 36 of the Electricity Act 1989 for consent to construct and operate up to 16 wind turbines with associated infrastructure, including a Battery Energy Storage System (Aultmore Wind Farm Redesign hereafter referred to as the 'proposed development').

The proposed development would comprise of up to 16 three-bladed horizontal axis wind turbines, with a maximum blade tip height of 200metres (m) above ground level. It is anticipated that the installed nominal capacity of each wind turbine will be approximately 6.6 Megawatt (MW), giving a total installed capacity of 105.6MW. A Battery Energy Storage System with a rated capacity of 50MW is also proposed to be installed. The annual generation from the wind turbines is therefore estimated at approximately 411.7 Gigawatt hours (GWh) based on a Site derived capacity factor of 44.5%. This would supply renewable electricity equivalent to the approximate annual domestic needs of up to 117,312 UK households.

In selecting the Site and developing the layout of the proposed development, the need to maximise the full renewable energy potential has been carefully balanced against the need to ensure that it does not result in any unacceptable environmental impacts. This has involved undertaking extensive environmental surveys and assessment work over the course of the last few years, and on the basis of this work developing and amending the infrastructure layout to avoid, prevent or reduce any potentially significant adverse environmental effects as far as possible.

It is noted part of the Site has planning permission for a 13-wind turbine operation, with the planning reference number 07/02375/EIA granted in 2014, and extensions to the duration of the consent gained in 2017 and 2021. Since this original consent, significant advancement has been made in wind turbine technology. As such, the applicant has prepared this proposed development utilising the most modern wind turbine technology, to propose a more efficient development that would make a greater contribution to Scotland achieving its net zero emission targets.

This Planning Statement provides an overview of the proposed development and its associated benefits to renewable energy generation targets, carbon dioxide (CO₂) emissions off-setting and to the local community in terms of the community benefit fund and potential shared ownership scheme identified by the Applicant.

The Planning Statement then goes on to assess the proposed development against relevant national and local planning policy and supplementary guidance, energy policy and other relevant material considerations.

As the proposed development is for a generating station with capacity in excess of 50MW the application is made under section 36 of the Electricity Act 1989, rather than the Town and Country Planning (Scotland) Act 1997, as amended. This means that although important to consider, the Local Development Plan does not hold the same weight in the decision-making process. Instead, the applicant has obligations under Schedule 9 of the Electricity Act 1989 requiring regard to certain environmental matters when formulating development proposals, including the desirability of preserving natural beauty, conserving listed natural heritage interests and protecting sites, buildings and objects of architectural and historical interest. This Planning Statement alongside the submitted Environmental Impact Assessment Report demonstrate how the applicant has had regard to these relevant environmental matters.

It is clear from the National Planning Framework 4 (NPF4), adopted in February 2023, and the Onshore Wind Policy Statement 2022, that the Scottish Government now requires that greater weight be given to the climate emergency and the importance of rapidly increasing renewable energy generation capacity in the decision-making process.

The Moray Local Development Plan (2020) is already strongly supportive of new renewable energy projects, however as NPF4 now forms part of the statutory development plan, this support in the Planning Policy is further enhanced.



Significant weight should be given to this up-to-date supportive policy context and the potential contribution of the Proposed Development to renewable energy and emissions reductions targets in the determination of this application. It is concluded that the planning balance lies firmly in favour of the proposed development and consent should be granted.



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A.1 Climate Change and Renewable Energy
A.1.1 International Context
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A.1.4 Conclusion



1.0 Introduction

1.1 The Application

1. This Planning Statement has been prepared on behalf of Vattenfall Wind Power Limited to accompany an application under section 36 of the Electricity Act 1989 for the construction and operation of a wind farm (up to 16 wind turbines with a total installed capacity of approximately 105.6MW and additional Battery Energy Storage System (BESS) with 50MW installed capacity) located within Aultmore Forest, approximately 6km north of Keith in Moray and 7km south of Buckie, in north-east Scotland (herein after referred to as the 'proposed development'). The application Site (herein after referred to as 'the Site') lies wholly within the administrative boundary of Moray Council. The proposed development would be known as Aultmore Wind Farm Redesign and would be centred on National Grid Reference (NGR) (E345000, N858400), as shown on **Figure 1**.
2. In addition to the application for consent in terms of section 36 of the Electricity Act a request is also being made that a direction be issued under section 57(2) of the Town and Country Planning (Scotland) Act 1997, as amended, that planning permission be deemed to be granted.
3. The proposed development constitutes a Schedule 2 development under the Electricity Works (Environmental Impact Assessment) (Scotland) Regulations 2017. An Environmental Impact Assessment (EIA) has been carried out and the application is accompanied by an EIA Report. This Planning Statement does not form part of the EIA Report. However, reference is made to the conclusions of the EIA Report in assessing the acceptability of the proposals.

1.2 The Applicant

4. The applicant is Vattenfall Wind Power Limited ('the applicant'), which is one of Europe's largest producers and retailers of electricity and heat. The Vattenfall group has approximately 20,000 employees, and their main markets are UK, Sweden, Germany, the Netherlands and Denmark. Vattenfall have operated in the UK since 2008 and have been a key partner in enabling the UK to reach net zero. The parent company of Vattenfall Wind Power Ltd is Vattenfall AB, which is 100% owned by the Swedish State with headquarters based in Solna, Sweden.
5. Formed in 1909, Vattenfall is said to have been the world's first state-owned power producer, and in the following 100 years have electrified industries, supplied energy to people's homes and modernised their way of living through innovation and cooperation. Vattenfall is determined to make fossil-free living possible within one generation and is driving the transition to a more sustainable energy system through growth in renewable production and climate smart energy solutions for its customers.
6. Vattenfall currently operates 10 wind farms in the UK, five onshore, and five offshore, with a total generating capacity of 1069MW, which generate enough electricity to power approximately 850,000 homes. Vattenfall also have numerous projects in their pipeline, ranging from proposals to projects currently under construction, that could power more than 4 million UK homes. Vattenfall is on track to help save 8 million tonnes of CO₂ a year by 2030, the equivalent saving as taking 4 million cars off the road and continues to grow in district heating and power networks to enable the fossil freedom that drives society forward.

1.3 The Purpose of this Planning Statement

7. The purpose of this Planning Statement is to explain the legislative framework within which the proposed development requires to be considered. In doing so, material considerations that are relevant to the determination of this section 36 application are identified and then assessed. The intention of this Planning Statement is to assist the decision maker (and the



relevant planning authorities when responding to the decision maker) to reach an informed opinion regarding the planning balance and acceptability of the proposed development.

8. This Planning Statement is structured as follows:

- Section 2 identifies the location of the Site and provides an overview of the proposed development;
- Section 3 sets out the benefits of the proposed development;
- Section 4 summarises the legislative context for the determination of section 36 applications;
- Section 5 sets out the key renewable energy and climate change legislation and policies which establish the 'need case' for the proposed development.
- Section 6 identifies the relevant national planning policy, Local Development Plan policies and associated guidance and the weight it is considered should be given to these material considerations. Section 6 also provides an assessment of the proposed development against relevant planning policy; and
- Section 7 weighs up the planning case for the proposed development and provides concluding remarks on the overall acceptability of the proposed development having regard to all material factors.



2.0 The Proposed Development

2.1 The Site and Surroundings

2.1.1 The Site

9. The Site, centred on NGR (E 345000, N 858400), is located within Aultmore Forest, between the B9016 and B9018 highways, approximately 7km¹ south of Buckie and 6km south of Keith in Moray in north-east Scotland. The entire Site is located within the Moray Council administrative boundary and is managed by Forestry and Land Scotland (FLS), on behalf of Scottish Ministers, and is shown on **Figure 1**.
10. The Site consists predominantly of commercial forestry and comprises one large parcel of land, with turbines proposed to be located in the eastern and western sections. The Site contains some relatively small areas of bog/heath and a limited number of areas defined as ancient woodland (long established of plantation origin) but which have been incorporated into the commercial forestry. The forestry is of varying ages and will be felled at the appropriate time in accordance with the FLS land management plan. The central part of the Site is separated by a small strip of non-forested land. The three highest hills found across the Site are Millstone Hill (301m above ordnance datum (AOD)) in the west, Addie Hill (272m AOD) in the centre of the Site and Old Fir Hill (262m AOD) to the east.
11. There are no statutory landscape, ecological or archaeological designations within the Site.

2.1.2 The Surroundings

12. The area surrounding the Site consists primarily of pastoral and arable farmland, interspersed with small groups of residential properties and farms. The closest residential property in the surrounding area is within 50m of the Site boundary.
13. Statutory ecological designations within 10km of the Site boundary (see Figure 8.1.1 of the EIA Report) include:
 - River Spey Site of Special Scientific Interest (SSSI) and Special Area of Conservation (SAC), approximately 5.2km west from the Site;
 - Lower River Spey SSSI and SAC, approximately 5km west from the Site;
 - Moray Firth Special Protection Area (SPA), approximately 5.3km west northwest from the Site;
 - Moray and Nairn Coast SPA and Ramsar, approximately 5.3km northwest of the Site;
 - Mill Wood SSSI, approximately 4.5km south from the Site;
 - Dipple Brae SSSI, approximately 6km west from the Site;
 - Shiel Wood Pastures SSSI approximately 6.2km east-south-east from the Site;
 -
 - Cullen to Stake Ness Coast SSSI, approximately 6.8km north-north-east from the Site;
 - Dipple Brae SSSI, approximately 6km west from the Site;
 - Moss of Crombie SSSI, approximately 9.0km east-south-east from the Site;
 - Strathbogie Wildcat Priority Area, approximately 9km south from the Site;

¹ Distance to approximate centre of Site boundary



- Whitehill SSSI, approximately 9.8km south from the Site; and
 - Den of Pitlurg SSSI, approximately 9.9km south from the Site.
14. Statutory landscape designations within 15km of the Site boundary (see Figure 3.1c of the EIA Report) include:
- Portgordon to Cullen Coast Special Landscape Area (SLA), approximately 4.3km north of the Site;
 - Lossiemouth to Portgordon Coast SLA, approximately 6.3km northwest of the Site.;
 - Lower Spey and Gordon Castle SLA, approximately 7.2km northwest of the Site;
 - The Spey Valley SLA, approximately 4.3km west of the Site; and
 - Deveron Valley SLA, approximately 10.7km southeast of the Site.
15. The Cairngorms National Park (CNP) (including Wild Land and National Scenic Area designations) is located approximately 35km to the southwest of the Site.
16. There are 90 archaeological records (Canmore and HER) within the Site. There are 64 heritage assets of national importance within 20km and 53 assets of Regional Importance within 5km. Gordon Castle Garden and Designed Landscape is located approximately 4km to the northwest of the Site and Cullen House Garden and Designed Landscape is 5km northeast of the Site.

2.2 Planning History of the Site

17. Planning permission (07/02375/EIA) for the 13 turbine Aultmore Wind Farm was granted in 2014, and a section 42 application to vary condition 1, 18 and 24 of this permission was subsequently approved by Moray Council in February 2017 which brought with it a new permission (16/01657/APP). A further section 42 application to vary a condition of that permission was subsequently granted in August 2021. This brought with it a new planning permission (21/00484/APP) with a three-year timescale for the commencement of development (i.e. by August 2024).
18. The consented Aultmore Wind Farm consists of 13 wind turbines, one at 90m and the remaining twelve at a blade tip height of 110m, and includes provision for access tracks, borrow pits, substation/control building and temporary construction compounds.

2.3 Overview of the Proposed Development

19. The proposed development would comprise the following principal components:
- up to 16 three-bladed horizontal axis wind turbines with a maximum blade tip height of 200m. The proposed wind turbines would be nominally rated at 6.6 MW;
 - low to medium voltage external transformers and related switchgear at each wind turbine;
 - wind turbine foundations measuring approximately 25m diameter;
 - hardstand areas for erection cranes at each wind turbine location;
 - main crane hardstand measuring approximately 60m x 40m;
 - ancillary crane hardstandings (x3) measuring approximately 10m x 10m;
 - blade storage areas (blade fingers) measuring approximately 18m x 3m;
 - a network of Site tracks totalling 24.3km will be required, along with a new Site entrance from the public road network (B9016). The Site tracks will include:
 - 15.9km of upgraded tracks, which are currently built to Forestry and Land Scotland specifications and approximately 3.5m wide;



- Of this 15.9km, approximately 7.15km will comprise a “spine” road which runs from near the B9106 through to the crossroads between T8 and T7. The spine road will be widened to 7m to allow for two way construction traffic to operate, whilst the remaining 8.75km will be widened to 5m.
 - 8.4km of new tracks;
 - of this 8.4km, approximately 2.0km will comprise of the 7m wide “spine” road. The remaining 6.4km will comprise a 5m wide access track;
 - four new and three upgraded watercourse crossings;
 - up to four borrow pit search areas (dependent on availability of stone within the Site);
 - a substation compound containing electrical infrastructure, control buildings, welfare facilities and a communications mast – **note two options are shown to provide flexibility for the grid connection but only one will be built.** The substation compound measures 100m x 200m;
 - a BESS compound, contained within the main substation compound. The battery energy system will have an indicative storage capacity of 115MWh and a peak power delivery of up to 50MW;
 - a network of buried electrical and communication cables, running in ducts alongside the access tracks;
 - a temporary batching plant compound measuring 50m x 50m;
 - two temporary construction compounds, each measuring 100m x 50m; and
 - the felling of 158.8ha of commercial forestry to enable the construction of the proposed development.
20. The layout of the proposed development is shown on **Figure 2**. It is requested that the precise locations of the proposed wind turbines and ancillary infrastructure may be microsited within a 100m radius from the positions shown on **Figure 2**. This micrositing is requested in order to allow a degree of flexibility to take into account localised ground conditions and other environmental constraints which may be identified during post consent survey works.
21. A micrositing planning condition requiring all micrositing of infrastructure (including wind turbines) to be within a 100m radius from the positions shown on **Figure 2** is proposed.

2.4 Wind Turbines

22. A range of wind turbine models may be suitable for the Site, and the final choice of turbine model would be selected through a competitive procurement process. As there is an uncertainty relating to which wind turbine model would be used at the time of construction, this application requests a reasonable degree of flexibility for the permissible dimensions of the turbine. However, based upon a maximum blade tip height of 200m, it is anticipated that the installed nominal capacity of each wind turbine will be approximately 6.6MW.
23. There is a statutory requirement to install visible aviation lights on the wind farm because the turbines are of 150m or greater in vertical height. In order to minimise landscape and visual effects arising, it was considered appropriate to devise a reduced lighting scheme, which does not require all of the proposed turbines to be lit. This lighting scheme has been approved by the Civil Aviation Authority and is included as **EIA Report Technical Appendix 14.1**.
24. A reduced lighting scheme has been agreed with the CAA, and the details are as follows:
- Intermediate level 32 candela lights are not required to be fitted on the turbine towers;
 - Medium intensity steady red (2,000 candela) lights will only be required on the nacelles of T01, T02, T03, T05, T06, T08, T13, T15 and T16; and



- The lights on these turbines to be capable of being dimmed to 10% of peak intensity when the lowest visibility as measured at suitable points around the wind farm by visibility measuring devices exceeds 5km. Visibility sensors would be installed on turbines. Should atmospheric conditions (for example, a lack of 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.

2.5 Ancillary Infrastructure

25. Turbine foundation construction design will be finalised at the detailed design engineering stage following selection of the final wind turbine to be used for construction.
26. A crane hardstanding of approximately 60m x 40m will be required adjacent to each wind turbine, to provide a stable base for construction and crane erection activities. These crane hardstanding areas will be permanently retained for maintenance operations. Additional temporary areas of hardstanding for ancillary crane pads, blade fingers and other activities may be constructed, dependent on the final arrangement for the delivery and erection of the turbine components. These details will be confirmed following the commercial tendering and selection of the wind turbine model to be used at the Site, and following detailed design.
27. For the access route to connect to the Site infrastructure, a total of approximately 24.3km of access track will be required. This will comprise approximately 8.4km of new track, and approximately 15.9km of existing track which will require to be upgraded. This internal access track will require the formation of four new watercourse crossings and potential upgrading of three existing watercourse crossings.
28. The electricity produced by the wind turbines will be fed by underground cables, to a substation control building (located within the substation compound). Two locations are proposed for the substation compound to provide flexibility around grid connection, but only one will be constructed for the project. The proposed substation compound would be approximately 200m x 100m and contain electrical infrastructure, control buildings, welfare facilities and a communications mast.
29. The applicant has a contracted grid connection offer with the Transmission Operator. The connection date is for October 2030. The current proposals are for the proposed development to be connected to the wider grid network via existing 132kV power lines which run north-south parallel to the B9018 to the east of the Site. The connection from the onsite substation to the 132kV power lines would comprise of buried 132kV cables and/or overhead lines. The exact arrangement of this grid connection is subject to design by Scottish and Southern Energy, the Transmission Operator (TO), but is expected to be to the Blackhillock – Macduff overhead line².
30. Any final grid connection route and associated consents would be the responsibility of the TO.
31. The proposed development will also include a BESS, which will be located within the main substation compound area. The BESS infrastructure will be installed on concrete foundations and include the energy storage device, inverters, transformers and other ancillary equipment.

2.6 Construction Phase

32. It is anticipated that construction activities for the proposed development would take approximately 18 months.

² Discussions with the TO have indicated that a connection into the existing Blackhillock – MacDuff line is the current offer from SSE, but a connection to Keith is also under consideration. SSE will be responsible for a separate grid connection planning application.



33. The proposed Site access and delivery route for construction traffic is anticipated to be from the B9016 as shown on **Figure 3**.
34. In general, working hours for construction will be from 07:00 to 19:00 Monday to Friday and 07:00 to 13:00 on Saturdays. No working is proposed on Sundays or public holidays. If work is required outwith these hours, this will be agreed in advance with Moray Council.
35. Exceptions to the proposed working hours will be made for foundation pours, wind turbine delivery/erection, emergency works, dust suppression and testing of plant and equipment. Concrete pouring for an individual wind turbine foundation must take place continuously and so activity will only cease when the pour has been completed. Wind turbine erection can only occur during periods of low wind speeds so to minimise the construction programme, lifting operations may need to be scheduled outwith the above hours. In addition to this, it may be necessary to complete a particular lifting operation to ensure the structure is left safe.

2.7 Operational Phase

36. The proposed development would have an operational life of up to 35 years from final commissioning. The wind farm would largely be controlled and managed remotely, however there would be technicians on Site regularly.

2.8 Decommissioning and Site Restoration

37. At the end of its operational life, it is anticipated that the proposed development would be decommissioned in accordance with a Decommissioning and Restoration Plan (DRP) which would be submitted to Moray Council for approval. Following this, it is expected that the proposed development would then be decommissioned and the Site restored in line with the provisions agreed with Moray Council in the DRP.

3.0 Benefits of the Proposed Development

3.1 Renewable Electricity Generation

38. The proposed wind turbines would have an anticipated nominal capacity of approximately 105.6MW. The annual generation from the wind turbines is therefore estimated at approximately 411.7 Gigawatt hours (GWh) based on a Site derived capacity factor of 44.5%.
39. Based upon this predicted annual electricity generation figure and the most recent energy statistics provided by the Department of Business, Energy and Industrial Strategy (BEIS)³ which identify that average UK domestic household consumption is 3,509 kilowatt hours per annum, it is estimated that the proposed development will supply renewable electricity equivalent to the current annual domestic needs of approximately 117,312 UK households.
40. The Scottish Ministers are legally bound through the Climate Change (Scotland) Act 2009⁴ to reduce carbon emissions to net zero by 2045, with interim targets to reduce emissions by 75% by 2030 and 90% by 2040. A series of annual targets towards this net zero and interim target have also been set.
41. The proposed development would reduce greenhouse gas emissions through replacing fossil fuel generation. On the basis of anticipated renewable energy generation output presented above, it is submitted that the proposed development would make a substantial contribution towards climate change targets, in particular towards the interim target for a 70% reduction in greenhouse gas emissions by 2030.

³ Calculated using the most recent statistics from the Department of Business, Energy and Industrial Strategy (BEIS) showing that annual GB average domestic household consumption is 3,509kWh (as of December 2022, updated annually)

⁴ Scottish Government (2009). Climate Change (Scotland) Act 2009



3.2 Carbon Payback

42. The carbon payback period for a wind farm is an estimate of how long it will take the proposed development to offset the greenhouse gases emitted as a result of its manufacture and construction (the “carbon cost, or losses”) and begin displacing grid-based electricity generated from non-renewable sources (“the carbon saving, or gains”)
43. A carbon balance assessment has been undertaken for the proposed development using the latest version of the Scottish Government’s carbon calculator for wind farms (version 1.7.0). The methodology used for the carbon calculator includes a range of factors that account for carbon losses including:
- turbine lifecycle (e.g. manufacture, construction and decommissioning);
 - backup power generation when the wind turbines cannot generate energy⁵;
 - reducing carbon fixing potential from peat loss;
 - soil organic matter from peat losses; and
 - dissolved organic carbon and particulate organic carbon leaching from changes in drainage in peat.
44. The results of the annual carbon savings calculations are presented as equivalent to the tonnes of carbon dioxide per year (tCO₂ yr⁻¹) saving relative to coal fired electricity generation, fossil fuel generation, and grid mix generation (which includes some fossil fuels and low carbon electricity generation sources such as nuclear, hydro-electric and wind energy).
45. The carbon savings calculations for the proposed development are presented in **Table 3-1** for three scenarios. The first scenario is the expected scenario, which uses impact factors that are considered to be the most likely for the proposed development. Two further (minimum and maximum) scenarios are also presented that use a wide range of factors that test the sensitivity of expected predictions to input variations.

Table 3-1: Anticipated Carbon Emissions/ Payback Period

Results	Exp.	Min.	Max.
Net emissions of carbon dioxide (t CO₂ eq) (carbon losses minus carbon gains) per annum.	237,689	188,182	323,598
Carbon Payback Time			
...coal-fired electricity generation (years)	0.6	0.5	0.8
...grid-mix of electricity generation (years)	3.0	2.3	4.1
...fossil fuel – mix of electricity generation (years)	1.3	1.0	1.8
Ratio of CO₂ equivalent emissions to power generation (g/kWh) (Target ratio by 2030 (electricity generation) <50 g/kWh)	16.5	12.92	22.72

⁵ Because wind generated electricity is inherently variable, accompanying backup power is required to stabilise the supply to the consumer. The extra capacity needed for backup power generation is currently estimated to be 5% of the rated capacity of the wind plant if wind power contributes more than 20% to the national grid.



3.3 Peatland Restoration and Habitat Management

46. A Biodiversity Enhancement and Restoration Plan (BERP) will be produced for the proposed development. The overall purpose and implementation of the BERP will be to compensate for the temporary or permanent loss, or disturbance of Annex 1 habitats, at the construction and operational phases, to enhance existing habitats on Site and aid the recovery of natural habitats and populations in a wider biodiversity context.
47. There are four main aims for the BERP, which are:
 - Aim 1: Restoration of degraded peatland habitats on Site;
 - Aim 2: Restoration of heathland habitat;
 - Aim 3: Enhancement of riparian habitats; and
 - Aim 4: Enhancement and restoration of woodland habitats on Site including mature conifer plantations, broadleaved woodland and former ancient woodland sites.
48. An outline BERP is included in **EIA Report Technical Appendix 8.6** and supports **EIA Report Chapter 8: Ecology Assessment**. A total of 14.4ha of peatland restoration is needed to adhere to NatureScot's *'Advising on peatland, carbon-rich soils and priority peatland habitats in development management'*⁶.
49. Once the proposed blanket bog has established, it is considered that it would result in a net positive impact and likely net gain in biodiversity.

3.4 Socio-economic Benefits

50. The capital investment for the overall project is estimated at £169 million (in 2023 values), which would include £6.2 million for development and project management, £113.1 million for turbines and plant, £30.3 million for electricals, grid connection, battery storage and £19.3 million for civil engineering, contingency and others.
51. In terms of employment during the construction and operational stages, this investment creates a number of economic opportunities for local and national businesses. **EIA Report Chapter 13: Socio-economic, Land Use and Tourism** identifies that the construction of the proposed development will directly support an estimated 86 person-years of net additional temporary employment locally and a further 232 person-years within Scotland during the 18 month construction period. The local economy would be expected to be boosted by approximately £5.8 million of net Gross Value Added (GVA) and the Scottish economy by a further approximately £16.4 million GVA during the construction of the proposed development. The operational phase of the proposed development will directly support approximately seven full time equivalent jobs locally and indirectly support approximately 20-27 full time equivalent jobs locally.
52. It is anticipated that a wide selection of supply chain businesses could expect to benefit from the investment in the local and Scottish economies. This may include services such as ground and road maintenance, catering, building trades and plant hire. Vattenfall Wind Power Ltd is committed to employing good practice measures with regard to maximising local procurement and would implement a Local Contractor Policy, where additional weight in the tendering process is given to primary contractors that show a clear commitment to increasing local content in their supply chains. Further detail on community benefit proposals is provided in Section 3.5.

⁶ Nature Scot (2023) *Advising on peatland, carbon-rich soils and priority peatland habitats in development management*. Available online: <https://www.nature.scot/doc/advising-peatland-carbon-rich-soils-and-priority-peatland-habitats-development-management#Assessing+the+Impacts+of+Development+on+Peatland,+Carbon-Rich+Soil+and+Priority+Peatland+Habitats> [accessed October 2023].



3.5 Community Benefit and Shared Ownership

3.5.1 Shared Ownership

53. The applicant is committed to working with the community to explore the potential of shared ownership of the proposed development, which is offered by the applicant on all of their onshore wind projects. Shared ownership could allow financial capital to be directly invested into improving the local area, possibly through community enhancements or improving skills and training, which could have a lasting benefit beyond the lifespan of the proposed development.

3.5.2 Community Benefit Fund

54. In addition to the shared ownership opportunity, should the proposed development gain consent, a Community Benefit Fund would be made available. This will be offered on the basis of a payment per MW of installed capacity at the Scottish Government recommended rate at the time of commissioning the proposed development. Current Scottish Government guidance is to *'promote community benefits of the value equivalent to £5,000 per installed megawatt per annum, index linked for the operational lifetime of the project.'* Based on the 105.6 MW proposed development this could provide a community benefit fund of around £528,000 each year to the local community. This could amount to around £18.4 million over the 35-year operational life of the proposed development. Turbine numbers and technology can change, with the final figure to be confirmed when (and if) the proposed development receives consent.
55. It is expected that any proposed income streams from these community benefit payments and profit from any community investment in the project could be used to support community projects within the local area. Local communities would be empowered to choose how the money is spent.
56. Benefits would accrue from the scale and nature of the proposed income streams associated with the proposed development and could have a lasting positive effect on access to resources, improvement to local amenities and the quality of life of local residents as well as economic benefits. The long-term nature of the income 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.



4.0 Legislative Context

4.1 Section 36 of the Electricity Act 1989

57. As the proposed development is for a generating station in excess of 50MW, the application for consent is made to the Scottish Ministers under section 36 of the Electricity Act 1989. Alongside the application for consent, a request is also being made that a direction be issued under section 57(2) of the Town and Country Planning (Scotland) Act 1997, as amended, that planning permission be deemed to be granted.
58. The applicant has obligations under sub-paragraphs 3(1)(a) and 3(1)(b) of Schedule 9 of the Electricity Act 1989 which require it to have regard to certain environmental matters when formulating development proposals. It is obliged to have regard to the desirability of preserving natural beauty, conserving flora, fauna and geological or physiographical features of special interest and protecting sites, buildings and objects of architectural, historical or archaeological interest. It must also do what it reasonably can to mitigate any effects of the proposed development. Pursuant to sub-paragraph 3(3) of Schedule 9, the applicant is required to avoid, so far as is possible, causing injury to fisheries or fish stocks in any waters.
59. The EIA process undertaken for the proposed Aultmore Wind Farm Redesign has considered all of the environmental matters set out in Schedule 9, paragraph 3(1)(a). Indeed, the EIA process has a broader topic range than that contained in the aforementioned sub-paragraph. Furthermore, where significant effects are found as part of the EIA process, appropriate mitigation is proposed. This includes embedded mitigation which is integral to the design and specific mitigation measures which have been identified. The EIA Report sets out in detail how the applicant has approached the design of the scheme and how careful consideration has been given throughout that process to the matters that are listed in sub-paragraph 3(1)(a). It is therefore considered that the applicant has fulfilled the statutory requirements of Schedule 9.
60. In addition, Schedule 9 of the Electricity Act 1989 also imposes duties upon the Scottish Ministers to consider whether the applicant has provided sufficient information to enable them to address their duties under sub-paragraph 3(1)(a) of Schedule 9 to the 1989 Act. They are obliged to have regard to desirability of the matters mentioned in paragraph (a) of sub-paragraph (1) and must also have regard to the extent to which the applicant has complied with their duties to mitigate any effects on those resources. Again, the Scottish Ministers can be satisfied that the EIA process has been undertaken appropriately and addresses these matters comprehensively.
61. In terms of determinations under section 36, there are no specific statutory presumptions that apply. As identified above, there are considerations which have to be taken into account and dealt with under Schedule 9. In that context, important factors that must be taken into account include international decarbonisation obligations and commitments, United Kingdom and Scottish climate change and energy policy, the relevant provisions of the Development Plan (including NPF4) and the views of statutory consultees and interested parties. All of these matters are material and should be taken into account in the decision-making process. The ultimate weight of any particular factor in the decision-making process is a matter for the decision maker, though guidance on the weight that the applicant considers should be afforded to these considerations is provided in this Planning Statement.
62. In the case of section 36 applications, it is important to note that the role of the Development Plan is not the same as in the case of a planning application made under the Town and Country Planning (Scotland) Act 1997, as amended. The test set out in Section 25 of the Town and Country Planning (Scotland) Act 1997, as amended, which provides that development must accord with the terms of the Development Plan unless material considerations indicate otherwise, does not apply in the case of a section 36 application. Whilst the Development Plan does not have primacy in the section 36 decision-making process, it may nonetheless be a material consideration in respect of determination of the application.



5.0 Climate Change and Renewable Energy Policy Considerations

5.1 Introduction

63. The Electricity Act 1989 provisions detailed above are the primary considerations in determining applications submitted under this Act. Nonetheless, Scottish Ministers must have regard to any material UK and Scottish Government energy, climate policy and legislative provisions, in addition to national planning policy and advice, in determining a section 36 application.
64. The framework of international agreements, obligations, legally binding targets and climate change advisory reports is the foundation upon which national energy policy is based. This sets out the need case for renewable energy which provides strong support for onshore wind in principle. In addition, NPF4 (discussed in Section 6.2 below) sets out, in policy, that decision makers must give significant weight to the global climate emergency and nature crises.
65. **Appendix A** sets out a summary of the relevant historical international and national climate change and renewable energy context, as well as the current emissions reduction legislative framework. **Table 5-1** provides an overview of some of the key international and UK commitments.

Table 5-1: Key International and UK Climate Change Commitments

Commitment/Agreement	Detail
The Paris Agreement (2016)	195 countries (including the UK) adopted a universal, legally binding global climate deal, known as the Paris Agreement. The Paris Agreement sets out a global action plan towards climate neutrality, with the aims of stopping the increase in global average temperature to well below 2°C above pre-industrial levels and to pursue efforts to limit global warming to 1.5°C.
Glasgow Climate Pact (2021)	197 countries (including the UK) agree to a new climate deal called the 'Glasgow Climate Pact' which strives to keep cutting emissions until they reach net-zero by 2050. All countries also agreed to speed up the pace of climate action this decade and to revisit and strengthen their current emissions targets to 2030.
Climate Change Act 2008 (2050 Target Amendment)	<p>The UK legislated the following targets as a result of the 2019 Committee on Climate Change report: 'Net Zero: the UK's Contribution to Stopping Global Warming'.</p> <ul style="list-style-type: none"> • UK overall: a new tougher emissions target of net zero greenhouse gases by 2050, ending the UK's contribution to global warming within 30 years. This would replace the previous target of an 80% reduction by 2050 from a 1990 baseline. • Scotland: a target of net zero greenhouse gases economy by 2045, reflecting Scotland's greater relative capacity to remove emissions than the UK as whole. • A net zero greenhouse gases target for 2050 would deliver on the commitment that the UK made by signing the Paris Agreement.



66. As shown in **Table 5-1** the international and UK climate change and renewable energy context is focused on reducing emissions and achieving 'net zero' in order to limit global warming. Increasing the speed of the shift towards renewable energy (including onshore wind) remains a critical element of achieving these aims. The following sections (5.2 to 5.7) will focus on the key Scottish climate change and renewable energy policies, strategies and legislation, as well as looking at the progress towards the carbon reduction / renewable energy production targets relevant to the proposed development.

5.2 Scottish Energy Strategy 2017 (SES)

67. The SES was published in December 2017, in the context of lower greenhouse gas emissions targets set initially under the Climate Change (Scotland) Act 2009. The SES sets out the Scottish Government vision for the future energy system in Scotland for the period through to 2050. The SES identifies that Scotland's long-term climate change targets will require the near complete decarbonisation of our energy system by 2050, with renewable energy meeting a significant share of our needs.
68. The SES set a target for the equivalent of 50% of the energy for Scotland's heat, transport and electricity consumption to be supplied from renewable sources by 2030. This 50% target roughly equates to 17GW of installed capacity in 2030. In addition to setting energy targets, the SES also sets out six strategic priorities. These include, *inter alia*:
- "System security and flexibility – we should have the capacity, the connections, the flexibility and resilience necessary to maintain secure and reliable supplies of energy to all of Scotland's homes and businesses as our energy transition takes place.
 - Renewable and low carbon solutions – we 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 needs – helping to achieve our ambitious emissions reduction targets."
69. The SES advises that onshore wind energy development is essential to Scotland's transformation to a fully decarbonised energy system by 2050 and brings opportunities which underpin our vision to grow a low carbon economy and build a fairer society.

5.3 The Climate Change (Emissions Reduction Targets) (Scotland) Act 2019

70. In May 2019 the Scottish Government formally declared a climate emergency. This resulted in the Climate Change (Emissions Reduction Targets) (Scotland) Act 2019, which amends the Climate Change (Scotland) Act 2009 and commits the Scottish Ministers to a new target of net zero emissions of all greenhouse gases by 2045, with interim targets for reductions of at least 56% by 2020, 75% by 2030 and 90% by 2040. These amended greenhouse emissions targets, and the series of annual targets towards them, represent a substantial increase over the targets set in the previous Act.
71. To help ensure delivery of the long-term targets, the framework includes statutory annual targets for every year to net zero. Up to 2020 the annual percentage reduction required was 1%, increasing to 1.9% for each year between 2020 and 2030, a near doubling of the response.
72. Part 4 of the 2009 Act places climate change duties on Scottish public bodies. It states that a "public body must, in exercising its functions, act: in the way best calculated to contribute to the delivery of (Scotland's climate change) targets; in the way best calculated to help deliver any (Scottish adaptation programme); and in a way that it considers most sustainable". This means that all public sector organisations, including Scottish Ministers and local authorities, are obliged in exercising their functions to do so in a manner which is consistent with meeting the net zero climate change target.



5.4 Onshore Wind Policy Statement (OWPS) 2022

73. The Scottish Government published the OWPS in December 2022. The OWPS 2022 sets a new ambition for the deployment of onshore wind in Scotland: a minimum installed capacity of 20GW of onshore wind in Scotland by 2030. This 20GW ambition will help support the rapid decarbonisation of the energy system and the sectors which depend upon it, aligning with a just transition to net zero.
74. As a result of the policy ambition for a minimum installed capacity of 20GW by 2030, Chapter 1 of the OWPS 2022 contains specific acknowledgement of the need to further the speedy deployment of onshore wind, stating *"We must now go further and faster than before. We expect the next decade to see a substantial increase in demand for electricity to support net zero delivery across all sectors, including heat, transport, and industrial processes"*. If the policy ambition of a minimum of installed capacity of 20GW of onshore wind in Scotland by 2030 is to be achieved, consents need to be granted to allow deployment as quickly as possible. Paragraph 2.4.2 states that *"Onshore wind will play a crucial role in delivery of our legally binding climate change targets"*.
75. In paragraph 3.6.1, the OWPS also recognises that meeting the 2030 target will require *"taller and more efficient turbines. This will change the landscape"*. This statement echoes that of Policy 11(e)(ii) of NPF4 which sets an expectation for significant landscape and visual effects arising from some forms of renewable energy development.
76. In paragraph 3.6.2 of OWPS the Scottish Government's position on the construction of new wind farms and their effect on the landscape is further clarified as *"The only areas where wind energy is not supported are National Parks and National Scenic Areas. Outside of these areas, the criteria for assessing proposals have been updated, including stronger weight being afforded to the contribution of the development to the climate emergency, as well as community benefits"* in accordance with NPF4.

5.5 Onshore Wind Sector Deal for Scotland 2023

77. On 21 September 2023, The Scottish Government published 'The Onshore Wind Sector Deal'. The deal sets out the commitments from the Scottish Government and the onshore wind farm industry to deliver 20GW of onshore wind energy by 2023. The Government and the onshore wind farm industry's commitments within the deal include:
 - support the enhancement of current skills and training provisions through further higher education and training to focus on delivery of the needs of the wind industry;
 - continue to collaborate with local communities, building on good practices to enhance its existing 'good neighbour' approach through engagement at all stages of the project's lifecycle and offering impactful community benefits and practical routes to shared ownership;
 - new onshore wind projects will enhance biodiversity and optimise land use and environmental benefits;
 - reduction in time taken to determine section 36 applications for onshore wind farm projects by increasing skills and resources by streamlining approaches to scoping Environmental Impact Assessment Reports;
 - develop evidence to support a more strategic approach to delivering the investment in our electricity network and to inform a coordinated approach to the transportation of wind turbine components across Scotland's road network; and
 - deliver cooperative coexistence between onshore wind deployment and safe aviation operations.



5.6 Draft Energy Strategy and Just Transition Plan 2023

78. On 10 January 2023, the Scottish Government published the draft version of its '*Energy Strategy and Just Transition Plan - delivering a fair and secure zero carbon energy system for Scotland*'. This plan outlines the key ambitions for Scotland's energy future, with an even greater focus on renewable energy. It is predicted that these policies would result in a net jobs gain across the energy production sector and will increase renewable energy exports whilst also reducing exposure to future global energy market fluctuations.
79. The Plan outlines several of the government's targets to reach a net zero Scotland, with the main milestones and dates outlined as:
- to substantially increase Scotland's renewable electricity generation capacity from the current level of 13.4 Gigawatts (GW) with an additional 20GW resulting in an overall capacity of at least 33.4GW by 2030;
 - aim to have 8-11GW of installed offshore wind capacity, and an additional 12GW of installed onshore wind capacity by 2030;
 - for renewable and low-carbon hydrogen power to provide 5GW (the equivalent of 15% of Scotland's current energy needs) by 2030, increasing to 25GW by 2045; and
 - to phase out the necessity for new petrol and diesel cars by 2032, and to reduce total car kilometres by 2030.
80. The plan also outlines general commitments made by the Government to assist with the transition to net zero, which include the following:
- to establish a national public energy agency – 'Heat and Energy Efficiency Scotland';
 - to increase the contributions of solar, hydropower and marine energy within Scotland's energy mix;
 - to accelerate the decarbonisation of domestic industry, transport and heat in buildings;
 - to generate surplus electricity – allowing for the export of electricity and renewable hydrogen to support decarbonisation across Europe;
 - to create energy security – through the development of Scotland's resources and additional energy storage;
 - to allow for a just transition by maintaining or increasing employment in Scotland's energy production sector against a decline in North Sea production; and
 - to maximise the use of Scottish manufactured components in the energy transition, ensuring high-value technology and innovation.

5.7 Progress Towards Targets

81. **Tables 5-2 and 5-3** and **Graphs 5-1 and 5-2** set out how Scotland has made progress towards the renewable energy and greenhouse gas targets set by the Scottish Government. Since renewable energy targets are not yet being met it is considered that the proposed development would make a valuable contribution to trying to achieve these ambitious targets.



Table 5-2: Progress Against Renewable Energy Targets

Year	Target	Achieved/ Progress
2020	Equivalent of 100% of all electricity used in Scotland to come from renewable sources. ⁷	No - equivalent of 98.6% of all electricity used in Scotland came from renewable sources. ⁸
2021	Equivalent of 100% of all electricity used in Scotland to come from renewable sources. (continuation of 2020 target as target was not met)	No - equivalent of 85.2% of all electricity used in Scotland came from renewable sources. (Graph 5-1).
2030	To increase the installed onshore wind capacity in Scotland to 20GW. ⁹	Latest figures in September 2022 (most recently available) show that the installed onshore wind capacity in Scotland was 13.6GW. ¹⁰
2030	To generate 50% of Scotland’s overall energy consumption from renewables sources. ¹¹	Final figures for 2020 indicate that the equivalent of 26.7% of total Scottish energy consumption came from renewable sources; the highest level to date. It increased from 24.0% in 2019 (Graph 5-2).
2050	To have decarbonised the energy system almost completely ¹² .	Future target and difficult to gauge progress against.

⁷ Scottish Government (2011) *2020 Renewable Routemap for Renewable Energy in Scotland Update 2011*

⁸ Scottish Government (2011) *2020 Renewable Routemap for Renewable Energy in Scotland Update 2011*

⁹ Scottish Government *Onshore Wind Policy Statement 2022*

<https://www.gov.scot/publications/onshore-wind-policy-statement-2022/documents/>

¹⁰ Scottish Government Energy Statistics for Scotland – Q3 2022

<https://www.gov.scot/publications/energy-statistics-for-scotland-q3-2022/pages/renewable-electricity-capacity/>

¹¹ Scottish Government (2017). *The future of energy in Scotland: Scottish energy strategy* 20 December 2017

¹² Scottish Government (2017). *The future of energy in Scotland: Scottish energy strategy* 20 December 2017



Table 5-3: Progress Against Greenhouse Gas Emissions Targets

Year	Current Target ¹³ (% Reduction of Emissions relative to 1990)	Recommended Target ¹⁴ (% Reduction of Emissions relative to 1990)	Achieved/Progress ¹⁵
2020	56% reduction	N/A	Achieved – GHG account reduced by 59% between the baseline period and 2020. As detailed in the Scottish Emissions Targets – First Five-Yearly Review (December 2022): <i>“The fall in emissions in 2020 was largely due to the travel restrictions during the COVID-19 pandemic and it is unlikely the target would have been achieved without the impacts of the pandemic.”</i>
2021	57.9%	51.1%	Not achieved – GHG account reduced by 49.9% between baseline period and 2021.
2022	59.8%	53.8%	Most recent data available is 2021 figure.
2023	61.7%	56.4%	Most recent data available is 2021 figure.
2024	63.6%	59.1%	Most recent data available is 2021 figure.
2025	65.5%	61.7%	Most recent data available is 2021 figure.
2026	67.4%	64.4%	Most recent data available is 2021 figure.
2027	69.3%	67.0%	Most recent data available is 2021 figure.
2028	71.2%	69.7%	Most recent data available is 2021 figure.
2029	73.1%	72.3%	Most recent data available is 2021 figure.
2030	75% reduction	75% reduction	Most recent data available is 2021 figure.
2040	90% reduction	90% reduction	Most recent data available is 2021 figure.
2045	100% reduction	100% reduction	Most recent data available is 2021 figure.

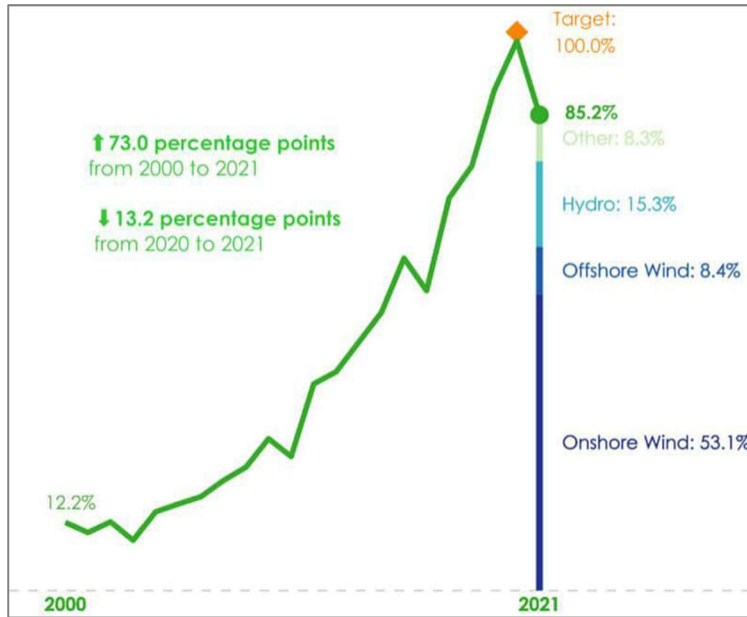
¹³ Scottish Government (2019). Climate Change (Emissions Reduction Targets) (Scotland) Act 2019

¹⁴ Independent Climate Change Committee (2022). Scottish Emissions Targets – First Five-Yearly Review

¹⁵ Scottish Government Scottish Greenhouse Gas Statistics 2021:
<https://www.gov.scot/binaries/content/documents/govscot/publications/statistics/2023/06/scottish-greenhouse-gas-statistics-2021/documents/scottish-greenhouse-gas-statistics-2021/scottish-greenhouse-gas-statistics-2021/govscot%3Adocument/scottish-greenhouse-gas-statistics-2021.pdf>

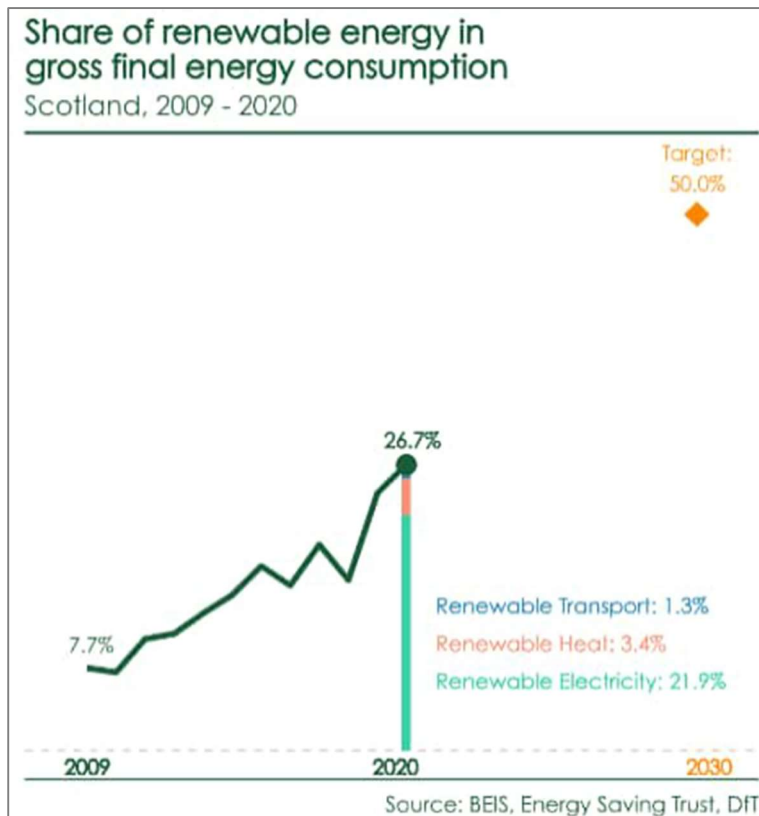


Graph 5-1: Renewable Electricity Generation in Scotland



Source: Energy Statistics for Scotland Q3 2022

Graph 5-2: Progress Against Renewable Energy Targets



Source: Scottish Energy Statistics Hub, (2022)



82. **Table 5-2** details that the target for the equivalent of 100% of all electricity used in Scotland to come from renewable sources by 2020, was not achieved. Table 5-2 and Graph 5-1 show that the target was just narrowly missed, with the equivalent of 98.6% of all electricity used in Scotland in 2020 coming from renewable sources. The target was continued into 2021, however that year saw the equivalent of only 85.2% of all electricity used in Scotland coming from renewable sources (see **Graph 5-1**). There is therefore clearly still the need for an increase in the amount of electricity generated from renewable sources to meet this target.
83. The 2030 targets detailed in **Table 5-2** require approximately a further 6.4GW of onshore wind capacity to be installed in under seven years from now. In addition to this, 50% of Scotland's overall energy consumption (not just electricity) is to come from renewable sources by 2030 (see **Graph 5-2** for most up to date progress towards this target).
84. **Table 5-3** shows the progress Scotland is making against its greenhouse gas emissions targets. The table shows that the 2020 target of a 56% reduction of greenhouse gas emissions relative to 1990 was achieved, however as detailed in the Scottish Emissions Targets – First Five-Yearly Review (December 2022), this was mainly due to travel restrictions during the COVID-19 pandemic and the target would likely not have been achieved without the impacts of the pandemic. It should be noted that the Scottish Emissions Targets – First Five-Yearly Review (December 2022), recommends that the annual targets for greenhouse gas emissions be amended to those shown in the 'Recommended Target' column of **Table 5-3**. However, as can be seen in **Table 5-3**, Scotland met neither the current or recommended emissions reduction targets for 2021, and indeed emissions increased from 2020 levels.
85. Having missed its 2021 greenhouse gas emissions targets, it can be considered that Scotland is not currently on course to achieve the 2030 target of a 75% reduction in emissions relative to 1990. This is highlighted by the CCC in their 2022 Report to Parliament¹⁶, advising that the Scottish Government urgently needs to provide a quantified plan for how policies will combine to achieve emissions reductions, and subsequently the 2030 target.

5.8 Conclusions

86. The broad strategic (targets) and policy context in Scotland (as well as the UK as a whole and internationally) is strongly supportive of the urgent need for additional renewable energy generation capacity. The drivers behind this support can be summarised as follows:
- the need to address climate change and avoid/ mitigate against the worst projected effects;
 - the growing demand for electricity and the increased need for renewable energy generation that will be required to meet this need; and
 - the need for Scotland (and the UK) to reduce its dependency on imported oil and gas and to source more of its energy domestically.
87. As mentioned above and as discussed further in **Appendix 01**, the climate change policy context (including renewable energy policy) is highly supportive of renewable energy development. This support, in principle, is advocated from international level policy through to the UK level, Scottish Government level and local government level. The highly supportive strategy and policy framework has resulted in ambitious renewable energy and climate change targets, however it is clear from Section 5.6, that Scotland is not on course to meet these targets.
88. As detailed in Section 5.6, Scotland did not meet its 2020 target for 100% of all electricity used in Scotland to come from renewable sources (it also did not meet this target in 2021). Scotland did meet its 2020 target of a 56% reduction of greenhouse gas emissions relative to 1990, however this was largely due to the impact of the COVID-19 pandemic, and evidence

¹⁶ Climate Change Committee (2022). Scottish Emission Targets – First Five-Yearly Review and Progress in reducing emissions in Scotland – 2022 Report to Parliament



shows emissions rebounded in 2021. Scotland therefore did not meet either the current or recommended 2021 target for emissions reductions.

89. Overall, it is therefore concluded that the urgency of the renewable energy and climate change targets set by the Scottish Government (and UK Government) and the associated vital role that renewable energy developments such as the proposed development can play in meeting these targets, should be afforded substantial weight in the planning balance during determination of this application.



6.0 Planning Policy

6.1 Planning Policy Considerations

90. The Scottish Government adopted the NPF4 on 13 February 2023. NPF4 has now replaced National Planning Framework 3 (NPF3) and the Scottish Planning Policy 2014 (SPP). NPF3 and SPP no longer represent Scottish Ministers' planning policy and should not form the basis for (or be taken into consideration when) determining planning applications or section 36 applications. Both have been repealed entirely.
91. Section 13(2)(1) of the Planning (Scotland) Act 2019 amended section 24 of the Town and Country Planning (Scotland) Act 1997 to state that the Development Plan for an area is to be taken as consisting of the provisions of the National Planning Framework (now NPF4) alongside any local development plan for the time being applicable to the area.
92. Section 13(2)(3) of the Planning (Scotland) Act 2019 amended section 24 of the Town and Country Planning (Scotland) Act 1997 to state, where there is any inconsistency between the local development plan and NPF4, then whichever of them is later in date will prevail. In this case, NPF4 is the more recent document, with the Moray LDP and supplementary guidance being adopted in 2020.
93. The NPF4 and the relevant LDP are to be read together as the Development Plan. But where there is an incompatibility between one document and the other, the legislation prescribes that the later document prevails. For present purposes that is NPF4.

6.2 National Planning Framework 4 (NPF4)

94. NPF4 is a step change from the NPF3 and SPP in terms of facilitating the move to a net zero economy and society. This can be understood from the ministerial foreword of NPF4 which states:

"Planning carries great responsibility – decisions about development will impact on generations to come. Putting the twin global climate and nature crises at the heart of our vision for a future Scotland will ensure the decisions we make today will be in the long-term interest of our country."
95. Overall, NPF4 can be considered to be more 'pro renewable energy development' than its predecessors NPF3 and SPP. NPF4 contains stronger and clearer policy support about the weight that should be given to addressing the climate emergency and nature crises when assessing applications.
96. NPF4 removes the spatial framework for onshore wind farms and replaces it with a strategic spatial strategy which supports onshore wind energy generation and associated grid infrastructure in Scotland.

6.2.1 The Application of NPF4

97. Annex A of NPF4 sets out the way in which the document is to be used. In terms of development management and the application of the national-level policies in the consideration of applications, NPF4 states:

"The policy sections are for use in the determination of planning applications. The policies should be read as a whole. Planning decisions must be made in accordance with the development plan, unless material considerations indicate otherwise. It is for the decision maker to determine what weight to attach to policies on a case by case basis. Where a policy states that development will be supported, it is in principle, and it is for the decision maker to take into account all other relevant policies".
98. Annex A outlines that NPF4 is required by law to contribute to six outcomes. These relate to meeting housing needs, health and wellbeing, population of rural areas, addressing equality



and, most relevant to the proposed development, *“meeting any targets relating to the reduction of emissions of greenhouses gases, and, securing positive effects for biodiversity”*.

99. NPF4 contains a spatial strategy and Scottish Government development management policies to be applied in all planning decisions. It also identifies national developments which are aligned to the strategic themes of the Government’s Infrastructure Investment Plan.
100. Consideration of the proposed development against NPF4 policies can be found in Section 6.2.4 below, however it is considered important to firstly demonstrate the proposed development’s status as a ‘national development’ within NPF4.

6.2.2 National Developments

101. Annex B of NPF4 continues the approach set out in NPF3 of identifying national developments which are described as *“significant development of national importance that will help deliver the spatial strategy.”* Eighteen national developments are identified in total, with NPF4 stating *“national development status does not grant planning permission for the development”* but does clarify that *“their designation means that the principle of the development does not need to be agreed in later consenting processes.”*
102. The Prescribed National Development which is relevant to the proposed development is National Development 3 entitled ‘Strategic Renewable Electricity Generation and Transmission Infrastructure’.
103. Page 103 of NPF4 states the following with regards National Development 3, which locationally relates to all of Scotland:
“This national development supports renewable electricity generation, repowering, and expansion of the electricity grid...A large and rapid increase in electricity generation from renewable sources will be essential for Scotland to meet its net zero emissions targets...Additional electricity generation from renewables and electricity transmission capacity of scale is fundamental to achieving a net zero economy and supports improved network resilience in rural and island areas. Island transmission connections in particular can facilitate capturing the significant renewable energy potential in those areas as well as delivering significant social and economic benefits.”
104. National Development 3 is identified as being applicable to the whole of Scotland. Further criteria for development to be classified as a National Development 3 are:
 - a) on and offshore electricity generation, including electricity storage, from renewables exceeding 50 megawatts capacity;
 - b) new and/or replacement upgraded on and offshore high voltage electricity transmission lines, cables and interconnectors of 132kv or more; and
 - c) new and/or upgraded Infrastructure directly supporting on and offshore high voltage electricity lines, cables and interconnectors including converter stations, switching stations and substations.
105. The proposed development is an onshore wind farm in Scotland with an installed capacity in excess of 50MW and therefore clearly fits under National Development 3 within NPF4.
106. The proposed development therefore has National Development status.

6.2.3 NPF4 Spatial Strategy – Part 1

107. Part 1 of NPF4 is ‘A National Spatial Strategy for Scotland 2045’. The spatial strategy is to support the delivery of:
 - ‘Sustainable Places’: *“where we reduce emissions, restore and better connect biodiversity”*;
 - ‘Liveable Places’: *“where we can all live better, healthier lives”*; and



- ‘Productive places’: “where we have a greener, fairer and more inclusive wellbeing economy”.

108. The 18 National Developments that are outlined in Annex B support the NPF spatial strategy. As already detailed, the proposed development is considered a National Development.

6.2.4 NPF4 National Planning Policy – Part 2

109. Part 2 of NPF4 sets out national planning policies by topic related to the three themes for the delivery of sustainable, liveable and productive places.

110. Page 36 of NPF4 introduces the ‘sustainable places’ policies which are the policies most applicable to the proposed development. The principal policies to consider for the proposed wind energy development are Policy 1: Tackling the Climate and Nature Crisis and Policy 11: Energy. Other relevant policies to the proposed development are:

- Policy 2: Climate Mitigation and Adaptation;
- Policy 3: Biodiversity;
- Policy 4: Natural Places;
- Policy 5: Soils;
- Policy 6: Forestry, Woodland and Trees;
- Policy 7: Historic Assets and Places;
- Policy 14: Design Quality and Place;
- Policy 23: Health and Safety;
- Policy 25 Community Wealth Building; and
- Policy 29: Rural Development.

111. Policies 1 and 11 are considered first in this section, with other relevant policies then considered in numerical order thereafter.

6.2.4.1 Policy 1: Tackling the Climate and Nature Crises

112. This policy represents a fundamental change in Scottish planning policy and prescribes the amount of weight that should be applied to the global climate and nature crises in assessing development proposals; these issues must now form priorities for the decision maker. As stated in Page 8 of NPF4, significant weight is to be given to “the global climate emergency in order to ensure that it is now recognised as a priority in all plans and decisions.”

113. Renewable energy is one of the best tools available to tackle the global climate crisis and given the nature of the proposed wind farm development and its potential contribution towards Scottish Government climate change and renewable energy targets, significant weight should be given to this policy in the overall assessment of whether the proposed development accords with the Development Plan. Refer to **Table 6-1** for an analysis of the proposed development against Policy1 of NPF4.

Table 6-1 Analysis of NPF4 Policy 1 against the Proposed Development

Relevant Policy Text	Analysis
When considering all development proposals significant weight will be given to the global climate and nature crisis.	The onshore wind element of the proposed development would produce an average of approximately 411.7 Gigawatt hours (GWh) of electricity annually (which corresponds to a capacity factor of 44.5%). This equates to the power consumed by approximately 117,312 average UK households.



Relevant Policy Text	Analysis
	<p>It is anticipated that the wind farm would be connected to the grid in 2029/30 and would therefore make a meaningful contribution to the Scottish Government target for a minimum installed capacity of 20GW of onshore wind by 2030 and net zero by 2045; key timescales for the Scottish Government.</p> <p>The carbon calculator which accompanies the EIA Report as Technical Appendix 15.1 predicts that the proposed development would displace 5.8 million tonnes of CO₂ over the lifetime of the wind farm (assumed to be 35 years). It is expected that the overall payback time of a wind farm of the scale and high level of efficiency of the proposed development would be approximately 2.1 years when compared to the current grid fuel mix of energy generation, and 0.9 years when compared to a fossil fuel grid mix.</p> <p>With regard to the ‘nature crises’ the findings of the EIA Report related to ecology and ornithology are relevant. The Ornithology assessment reported in EIA Report Chapter 9: Ornithology Assessment has concluded that subject to mitigation measures and best practice techniques being implemented on Site, there would be no significant effects upon ornithological receptors, including goshawk during the construction, operation or decommissioning of the proposed development.</p> <p>As reported in EIA Report Chapter 8: Ecology Assessment, a programme of peatland restoration has been proposed as part of a BERP in order to compensate for the habitat loss of peatland as a result of the proposed development as well as to provide for significant biodiversity enhancement.</p>

6.2.4.2 Policy 11: Energy

114. The ‘policy principle’ for Policy 11 is *“to encourage, promote and facilitate all forms of renewable energy development onshore and offshore. This includes energy generation, storage, new and replacement transmission and distribution infrastructure and emerging low-carbon and zero emissions technologies including hydrogen and carbon capture utilisation and storage (CCUS).”*
115. The proposed development is a renewable energy development for the generation and storage of electricity and as such supports the principle of Policy 11 and assists in achieving the Policy Outcome, that being *“Expansion of renewable, low-carbon and zero emissions technologies”*.
116. Policy 11, part (a), states that *“Development proposals for all forms of renewable, low-carbon and zero emissions technologies will be supported”*. Wind farms are included in the list of developments that follow in the policy text and therefore, the proposed development, being a wind farm comprising 16 wind turbines, complies with part ‘a’ of Policy 11.
117. Policy 11 part (b) goes on to state that *“Development proposals for wind farms in National Parks and National Scenic Areas will not be supported”*. The proposed development is outwith any National Park or National Scenic Area, and therefore complies with part ‘b’ of Policy 11.
118. With regards to part (c) of Policy 11, **EIA Report Chapter 13: Socio-economic, Land Use and Tourism**, details that the proposed development would result in the following:



- community benefit payments of approximately £18,400,000 over the lifetime of the wind farm;
 - £169 million of capital investment in Scotland;
 - £5.8 million of net Gross Value Added (GVA) to the Moray Council administrative area over the course of the 18-month construction period;
 - a total of 86 person-years of net additional temporary employment is predicted to be generated in the Moray economy during the construction and installation phase of the proposed development. The figure for the whole of Scotland (including the Moray Council administrative area) is 232 person-years of net additional temporary employment; and
 - a total of between 20 and 27 permanent (direct and indirect) jobs in the Moray area.
119. Therefore, the proposed development can be seen to comply with part 'c' of Policy 11, as it is predicted to have a beneficial economic impact for the Moray area (and Scotland), through community benefit payments, capital expenditure, jobs and supply chain opportunities.
120. With regards to part (d) of Policy 11, there will be no significant effects on international or national designations. As required by Policy 11(d), further consideration of designated sites is discussed in the context of Policy 4.
121. Part (e) of Policy 11 requires that the project design and proposed mitigation will demonstrate how a number of environmental impacts have been addressed. It goes on to state that in considering these impacts in the overall planning balance, significant weight will be placed on the contribution of the proposal to renewable energy generation targets and on greenhouse gas emissions reduction targets. This is a reiteration of the degree of weight that is to be afforded to contributions that the proposed development can make to renewable energy targets and greenhouse gas emissions reduction targets, both of which would be contributed to by the proposed development and have been discussed in further detail in Section 3. In respect of Policy 11(e), the EIA Report sets out a robust assessment of the likely potential impacts that will arise from the proposed development.
122. Policy 11(e)(ii) recognises that significant landscape and visual impacts are to be expected for some forms of renewable energy, and states:
- “significant landscape and visual impacts, recognising that such impacts are to be expected for some forms of renewable energy. Where impacts are localised and/ or appropriate design mitigation has been applied, they will generally be considered to be acceptable;”*
123. Given the nature of wind turbines and their visibility in the landscape, this is an important consideration in the decision-making process with regard to potential landscape and visual impacts arising from this form of energy generation. This is a significant policy shift from Scottish planning policy pre-NPF4, and provides a strong stance for commercial scale wind energy developments where landscape and visual impacts are often inevitable.
124. **EIA Report Chapter 6: Landscape and Visual Impact Assessment** concludes that there would be major/moderate adverse and significant effects on the local character type (LCT) Low Forested Hills, which includes the Site, as a result of the proximity of the turbines which will become a dominant feature, alongside the forest. There is also anticipated to be major/moderate effects to LCT 8 Upland Farmland and LCT 3 Rolling Coastal Farmland. These effects are localised, within 5km of the proposed development and have been reduced through mitigation by design. There will be moderate adverse effects on the special qualities of the Portgordon to Cullen Coast Special Landscape Area (LSA) primarily as a result of the turbines being seen in views towards the wooded policies of Cullen House and towards the landmark hill of Bin of Cullen. As Policy 11(e)(ii) recognises the potential for significant landscape and visual effects for certain types of renewable energy development, it is considered that for the purposes of Policy 11, the proposed development has strong policy support.



125. No other significant impacts are predicted on the other environmental elements assessed in relation to Policy 11 in **Table 6-2**.
126. For the reasons set out in **Table 6-2**, the proposed development is considered to be acceptable in relation to all of Policy 11's environmental and technical topic criteria.

Table 6-2: Analysis of NPF4 Policy 11 against the Proposed Development

Relevant Policy	Analysis
<p>Policy 11(a) <i>Development proposals for all forms of renewable, low-carbon and zero emissions technologies will be supported. These include:</i></p> <ul style="list-style-type: none"> i. <i>Wind farms including repowering, extending, expanding and extending the life of existing wind farms...</i> iii. <i>Energy storage, such as battery storage and pumped storage hydro</i> 	<p>The proposed development is for a wind farm and battery storage, which will enable the generation and storage of renewable energy which is supported by this policy.</p>
<p>Policy 11(b) Development proposals for wind farms in National Parks and National Scenic Areas will not be supported.</p>	<p>The proposed development is not located in a National Park or National Scenic Area.</p>
<p>Policy 11(c) Development proposals will only be supported where they maximise net economic impact, including local and community socio-economic benefits such as employment, associated business and supply chain opportunities.</p>	<p>EIA Report Chapter 13: Socio-economic, Land Use and Tourism sets out the predicted socio-economic benefits of the proposed development.</p> <p>Key points include:</p> <ul style="list-style-type: none"> • community benefit payments of approximately £18.4 million over the life-time of the wind farm; • £5.8 million of net Gross Value Added (GVA) to the Moray Council administrative area over the course of the 18-month construction period; • A total of 86 person-years of net additional temporary employment is predicted to be generated in the Moray economy during the construction period and installation phase of the proposed project. The figure for the whole of Scotland (including the Moray Council administrative area) is 232 person-years of net additional temporary employment; and • a total of between 20 and 27 permanent (direct and indirect) jobs in the Moray area.



Relevant Policy	Analysis
<p>Policy 11 (d) Development proposals that impact on international or national designations will be assessed in relation to Policy 4</p>	<p>The proposed development will not have adverse impacts on international or national designations.</p>
<p>Policy 11 (e)(i) In addition, project design and mitigation will demonstrate how the following impacts are addressed:</p> <p>I. Impacts on communities and individual dwellings, including, residential amenity, visual impact, noise and shadow flicker</p> <p>In considering these impacts, significant weight will be placed on the contribution of the proposal to renewable energy generation targets and on greenhouse gas emissions reduction targets.</p>	<p>EIA Report Technical Appendix 6.5: Residential Visual Amenity Assessment summarises the findings of an assessment of effects on residential amenity within approximately 2km of the proposed turbines. Overall, it concludes that no residential property would receive effects of the highest magnitude and do not have the potential to reach the Residential Visual Amenity threshold.</p> <p>EIA Report Chapter 12: Acoustic Assessment sets out the methodology, assessment and subsequent findings of the noise impact assessment for the proposed development. It also takes into account the cumulative wind energy developments in the study area. The assessment concludes that wind turbine noise immission levels do not exceed the ESTU-R-97 criterion and thereby, the effects would be not significant.</p> <p>Potential shadow flicker effects have been considered within EIA Report Chapter 15: Other Issues including Shadow Flicker and Telecommunications. The nearest residential receptor to the proposed development is located approximately 856m from Turbine T5. The shadow flicker assessment shows that there is potential for significant shadow flicker effects (30 hours of shadow flicker effect per annum) to occur at one (consented but not yet built) nearby property as a result of the proposed development, based on a worst-case scenario. The applicant has committed to installing shadow flicker shut down modules at each turbine in order to mitigate against any effects.</p>
<p>Policy 11(e)(ii) In addition, project design and mitigation will demonstrate how the following impacts are addressed:</p> <p>II. significant landscape and visual impacts, recognising that such impacts are to be expected for some forms of renewable energy. Where impacts are localised and/or appropriate design mitigation has been applied, they will generally be considered to be acceptable.</p>	<p>EIA Report Chapter 6: Landscape and Visual Impact Assessment sets out the visual and landscape impacts of the proposed development.</p> <p>The landscape and visual impact assessment concludes that there would be major/moderate adverse and significant effects on the local character type (LCT) Low Forested Hills, which includes the Site, as a result of the proximity of the turbines which will become a dominant feature, alongside the forest. There is also anticipated to be major/moderate effects to LCT 8 Upland Farmland and LCT 3 Rolling Coastal Farmland. These effects arise as a result of views towards the turbines within 5km.</p> <p>The Viewpoint assessment assessed 23 viewpoints, with only one viewpoint assessed as having a large visual effect as a result of the proposed development, that being Core Path KT01 – Burn of Aultmore. Core Path KT01 is a core path and is discussed further in the table below.</p> <p>Overall, the viewpoint assessment concludes that the visual effects of the proposed development would be limited by the context, particularly in relation to operational and consented wind</p>



Relevant Policy	Analysis
<p>In considering these impacts, significant weight will be placed on the contribution of the proposal to renewable energy generation targets and on greenhouse gas emissions reduction targets.</p>	<p>farms. Mitigation through design has sought to reduce the visual impacts of the proposed development where possible.</p>
<p>Policy 11(e)(iii)</p> <p>In addition, project design and mitigation will demonstrate how the following impacts are addressed:</p> <p>III. public access, including impact on long distance walking and cycling routes and scenic routes;</p> <p>In considering these impacts, significant weight will be placed on the contribution of the proposal to renewable energy generation targets and on greenhouse gas emissions reduction targets.</p>	<p>EIA Report Chapter 6: Landscape and Visual Amenity Impact Assessment includes an assessment of the visual effects that would be experienced by people when travelling along recreational / scenic routes within the study area. The routes assessed are:</p> <ul style="list-style-type: none"> • Core Path KT01 – Burn of Aultmore <p>This route runs north-south through the Site between Drybridge and Newmill and the two groups of turbines. Moray Council as part of their Core Paths Plan Review are proposing to re-route a short length of the path. Both the existing and proposed paths are partially enclosed by forest when passing between the two groups of turbines. Views from the south will be more open and often encompass both groups of turbines, while from the north is more enclosed by trees and terrain. Views along this public recreation path are large scale within 2km of the turbines between Burn of Aultmore and where the route turns eastwards around woodland close to Newton of Letterfourie. Beyond this distance changes to views will reduce to large/medium scale with more distant and restricted visibility. Overall, the effects have been assessed as major/moderate, adverse and significant. These impacts are localised, and in accordance with the NPF4, it is acknowledged that such impacts are to be expected for renewable developments such as wind farms.</p> <p>An Access Management Plan would be in place for the construction phase of the wind farm, ensuring safe access can continue to the forest for members of the public.</p>
<p>Policy 11(e)(iv)</p> <p>In addition, project design and mitigation will demonstrate how the following impacts are addressed:</p> <p>IV. impacts on aviation and defence interests including seismological recording</p> <p>In considering these impacts, significant weight will be placed on the contribution of the proposal to renewable energy generation targets and on greenhouse gas emissions reduction targets.</p>	<p>EIA Report Chapter 14: Aviation and Radar highlights the consultation that has been carried out with key aviation related stakeholders.</p> <p>EIA Report Technical Appendix 14.1: Reduced Lighting Scheme sets out a reduced lighting scheme for the proposed development that has been agreed with the CAA.</p> <p>It is considered that planning conditions relating to aviation safety and aviation lighting for the proposed development could be employed to ensure no significant effects.</p>



Relevant Policy	Analysis
<p>Policy 11(e)(v)</p> <p>In addition, project design and mitigation will demonstrate how the following impacts are addressed:</p> <p>V. impacts on telecommunications and broadcasting installations, particularly ensuring that transmission links are not compromised</p> <p>In considering these impacts, significant weight will be placed on the contribution of the proposal to renewable energy generation targets and on greenhouse gas emissions reduction targets.</p>	<p>Consultation has been undertaken with key stakeholders to identify relevant communications links in the vicinity of the Site, and is detailed in Chapter 15: Other Issues including Shadow Flicker and Telecommunications.</p> <p>During the iterative design process, turbines have been moved in order to ensure that there would be no interference to identified communications links as a result of the proposed development, or mitigation is proposed to ensure no impacts on telecommunication links are experienced.</p>
<p>Policy 11(e)(vi)</p> <p>In addition, project design and mitigation will demonstrate how the following impacts are addressed:</p> <p>VI. impacts on road traffic and on adjacent trunk roads, including during construction</p> <p>In considering these impacts, significant weight will be placed on the contribution of the proposal to renewable energy generation targets and on greenhouse gas emissions reduction targets.</p>	<p>EIA Report Chapter 11: Traffic and Transport Assessment assesses the potential effects of increased traffic flows in the study area, arising from the construction, operation and decommissioning of the proposed development. No significant effects are expected during the operation and decommissioning stages of the proposed development.</p> <p>The assessment of the traffic impacts was undertaken in accordance with the IEMA guidance (2023). Therefore, several key factors were assessed, those being: severance of communities, road vehicle driver and passenger delay, pedestrian and non-motorised user delay, non-motorised user amenity, road user and pedestrian safety and hazardous/ large loads. The effects associated with the proposed development on these factors were considered to be minor or negligible and not significant.</p> <p>Notwithstanding the considered significance of the impacts, an outline Construction Traffic Management Plan (CTMP) has been prepared and is included within EIA Report Technical Appendix 11.2.</p> <p>The outline CTMP will be supplemented with additional information as appropriate by the applicant's appointed contractor(s), prior to commencement of construction activities. Should consent be granted, the outline CTMP would be updated to a CTMP, the content of which would be agreed with Moray Council through consultation and secured via a planning condition. The CTMP would be used during the construction phase of the proposed development to ensure traffic to, from and on the Site is properly managed. It is possible that a collaborative approach with the assessed cumulative sites may be incorporated as part of the CTMP at a later date.</p>



Relevant Policy	Analysis
<p>Policy 11(e)(vii)</p> <p>In addition, project design and mitigation will demonstrate how the following impacts are addressed:</p> <p>VII. impacts on historic environment</p> <p>In considering these impacts, significant weight will be placed on the contribution of the proposal to renewable energy generation targets and on greenhouse gas emissions reduction targets.</p>	<p>The historic environment is discussed in further detail under NPF4 Policy 7 below (Table 6-3). However, in summary no significant effects are predicted as a result of the proposed development.</p>
<p>Policy 11(e)(viii)</p> <p>In addition, project design and mitigation will demonstrate how the following impacts are addressed:</p> <p>VIII. effects on hydrology, the water environment and flood risk</p> <p>In considering these impacts, significant weight will be placed on the contribution of the proposal to renewable energy generation targets and on greenhouse gas emissions reduction targets.</p>	<p>EIA Report Chapter 10: Geology, Hydrology and Hydrogeological Assessment has assessed potential effects arising from construction and operation of the proposed development within 1km of the Site boundary.</p> <p>It has been concluded that through good practice design and construction of the proposed development delivered through a skilled team of competent workers, with mitigation and compliance monitored in collaboration with Scottish Environmental Protection Agency (SEPA), Moray Council and other engaged stakeholders, will result in a risk that is considered to be not significant in terms of the EIA Regulations.</p>
<p>Policy 11(e)(ix)</p> <p>In addition, project design and mitigation will demonstrate how the following impacts are addressed:</p> <p>IX. biodiversity including impacts on birds</p> <p>In considering these impacts, significant weight will be placed on the contribution of the proposal to renewable energy generation targets and on greenhouse gas emissions reduction targets.</p>	<p>Biodiversity is discussed in further detail under Policy 3 below (Table 6-3). However, in summary no significant effects on ecology or ornithology have been predicted once proposed mitigation is applied. Proposed mitigation includes blanket bog and wet heath restoration, and a programme of post-construction bird monitoring.</p>



Relevant Policy	Analysis
<p>Policy 11(e)(x)</p> <p>In addition, project design and mitigation will demonstrate how the following impacts are addressed:</p> <p>X. impacts on trees, woods and forests</p> <p>In considering these impacts, significant weight will be placed on the contribution of the proposal to renewable energy generation targets and on greenhouse gas emissions reduction targets.</p>	<p>The proposed development would require 158.8ha of woodland to be felled in order to facilitate the construction of wind turbines and associated infrastructure. While a keyhole approach is favoured, it is anticipated that a small number of mature forestry coupes may require to be clear-felled to the nearest wind farm edge to allow for the construction of the proposed development. Replanting would then take place up to the keyhole area.</p> <p>In areas where a young crop has been recently planted, keyholing into the young crop will be possible and tree felling kept to a minimum.</p> <p>Compensatory planting would be undertaken in line with the Scottish Government’s Policy on Control of Woodland.</p>
<p>Policy 11(e)(xi)</p> <p>In addition, project design and mitigation will demonstrate how the following impacts are addressed:</p> <p>XI. proposals for the decommissioning of developments, including ancillary infrastructure, and site restoration</p> <p>In considering these impacts, significant weight will be placed on the contribution of the proposal to renewable energy generation targets and on greenhouse gas emissions reduction targets.</p>	<p>It is proposed that the proposed development would be operational for a period of 35 years, subject to planning consent. Decommissioning impacts of the wind farm are considered to be less than those experienced during construction, and so detailed assessment has not been undertaken.</p> <p>At the end of its operational life, the proposed development and ancillary infrastructure would be decommissioned unless an application is submitted and approved to extend the operational period or to repower the Site.</p> <p>The ultimate decommissioning protocol would be agreed with Moray Council and other appropriate regulatory authorities in line with best practice guidance and requirements of the time. This would be done through the preparation and agreement of a Decommissioning and Restoration Plan.</p> <p>It is anticipated that the DRP would be the subject of a planning condition and the decommissioning period would be expected to take up to one year.</p>
<p>Policy 11(e)(xii)</p> <p>In addition, project design and mitigation will demonstrate how the following impacts are addressed:</p> <p>XII. The quality of site restoration plans including the measures in place to safeguard or guarantee availability of finances to effectively implement those plans</p> <p>In considering these impacts, significant weight will be placed on the contribution of the proposal to renewable energy generation targets and on greenhouse gas emissions reduction targets.</p>	<p>Proposals for Site restoration post construction are set out in EIA Report Technical Appendix 2.1: Outline Construction Environment Management Plan (CEMP).</p> <p>It is anticipated that most of the soil resources within areas directly affected by construction activities would be able to be stored and reinstated as close as possible to where they were excavated in accordance with best practice; so that the Site would be restored with minimal movement of material from its original location.</p> <p>Site restoration at the end of the operational life of the wind farm has been discussed in relation to Policy 11(e)(xi). It is expected that a DRP would be prepared in liaison with Moray Council and regulatory authorities at the time of decommissioning and that a financial provision for decommissioning would be provided. It is expected that a planning condition would be applied to any planning consent in this regard.</p>



Relevant Policy	Analysis
<p>Policy 11(e)(xiii)</p> <p>In addition, project design and mitigation will demonstrate how the following impacts are addressed:</p> <p>XIII. Cumulative impacts</p> <p>In considering these impacts, significant weight will be placed on the contribution of the proposal to renewable energy generation targets and on greenhouse gas emissions reduction targets.</p>	<p>In accordance with the EIA Regulations, the assessment has considered 'cumulative effects' in relation to the topics of landscape and visual, noise, traffic and transport, ecology and biodiversity, ornithology, geology, hydrology and hydrogeology and cultural heritage.</p> <p>A list of cumulative developments is provided in Table 5-2 and Table 5-3 in EIA Report Chapter 5: Approach to EIA and Consultation. No significant cumulative effects have been identified arising from the proposed development along with other operational, consented and submitted developments as of the end of July 2023 as set out in Table 5-2 of the EIA Report.</p>

6.2.4.3 Other Relevant NPF4 Policies

127. The other NPF4 policies that are relevant to the proposed development are considered in turn in **Table 6-3**. As set out in Annex A of the NPF4, the weight to be attached to policies is a matter for the decision maker.

Table 6-3: Analysis of Other Relevant NPF4 Policies

Policy	Relevant Policy Text	Analysis/ Where Addressed in EIA Report
Policy 2: Climate mitigation and adaptation	<p>a) <i>Development proposals will be sited and designed to minimise lifecycle greenhouse gas emissions as far as possible.</i></p> <p>b) <i>Development proposals will be sited and designed to adapt to current and future risks from climate change.</i></p> <p>...</p>	<p>As a wind farm, the proposed development would act to reduce greenhouse gas emissions from electricity production.</p> <p>The carbon calculator which accompanies the EIA Report as Technical Appendix 15.1 predicts that the proposed development would displace 166,863 tonnes of CO₂ per annum. It is expected that the overall payback time of a wind farm of the scale and installed capacity as the proposed development would be approximately 0.9 years when compared to a fossil fuel mix of energy generation.</p> <p>Chapter 10: Hydrology, Hydrogeology and Geology of the EIA Report includes a flood risk screening assessment.</p> <p>Any watercourse crossings required for the proposed development would be designed to pass the 200-yr flood event plus an allowance for climate change and their design and construction details would be agreed with SEPA and Moray Council as part of the final CEMP.</p>
Policy 3: Biodiversity	<p>a) Development proposals will contribute to the enhancement of biodiversity, including where relevant, restoring degraded habitats and building and strengthening nature networks and</p>	<p>The Site was selected due to it being situated within a commercial forestry. Therefore, the proposed development would have minimal adverse ecological impact, due to the existing Site quality.</p> <p>EIA Report Technical Appendix 8.6:</p>



Policy	Relevant Policy Text	Analysis/ Where Addressed in EIA Report
	<p>the connections between them. Proposals should also integrate nature-based solutions, where possible.</p> <p>b) Development proposals for national or major development, or for development that requires an Environmental Impact Assessment will only be supported where it can be demonstrated that the proposal will conserve, restore and enhance biodiversity, including nature networks so they are in a demonstrably better state than without intervention. This will include future management. To inform this, best practice assessment methods should be used. Proposals within these categories will demonstrate how they have met all of the following criteria:</p> <p>I. the proposal is based on an understanding of the existing characteristics of the site and its local, regional and national ecological context prior to development, including the presence of any irreplaceable habitats;</p> <p>II. wherever feasible, nature-based solutions have been integrated and made best use of;</p> <p>III. an assessment of potential negative effects which should be fully mitigated in line with the mitigation hierarchy prior to identifying enhancements;</p> <p>IV. significant biodiversity enhancements are provided, in addition to any proposed mitigation. This should include nature networks, linking to and strengthening habitat connectivity within and beyond the development, secured within a reasonable timescale and with reasonable certainty. Management arrangements for their long-term retention and monitoring should be included, wherever appropriate; and</p>	<p>Outline Biodiversity Enhancement and Restoration Plan is provided to improve habitats on Site, through which opportunities for protected and notable species will increase. This will be achieved by increasing habitat connectivity and the condition of open habitats on Site, as well as providing enhancements such as bat, pine marten and owl boxes.</p> <p>In line with the mitigation hierarchy, the proposed development has been subject to an extensive design iteration process in response to the constraints identified as part of baseline studies undertaken on the Site. This has included revising the location of turbines and infrastructure to avoid areas of deeper peat, residential receptors and areas considered to be ecologically sensitive. Further detail is available in EIA Report Chapter 3: Design Evolution and Alternatives.</p> <p>With regard to ornithology, EIA Report Chapter 9: Ornithology Assessment concluded that, with the implementation of good practice measures, there would be no significant effects predicted on any receptors as a result of the proposed development. Good practice measures would be employed to reduce the possibility of damage and destruction (and disturbance in the case of sensitive species such as breeding raptors and waders), to occupied bird nests during the construction phase.</p> <p>A programme of post-construction bird monitoring (including collision monitoring, flight activity surveys, breeding raptor surveys and carcass searching) is proposed as a mitigation measure to analyse the impact the proposed development would have on the disturbance/displacement of bird species (including goshawk) during operation.</p> <p>An assessment of the potential cumulative effects on IOFs from the proposed development along with all other operational, consented and submitted plans or projects was undertaken. It was concluded that if wind farms within 10km of the Moray Firth SPA implement good practice pollution prevention and appropriate precautions for invasive</p>



Policy	Relevant Policy Text	Analysis/ Where Addressed in EIA Report
	<p>V. local community benefits of the biodiversity and/or nature networks have been considered.</p> <p>...</p> <p>d) Any potential adverse impacts, including cumulative impacts, of development proposals on biodiversity, nature networks and the natural environment will be minimised through careful planning and design. This will take into account the need to reverse biodiversity loss, safeguard the ecosystem services that the natural environment provides, and build resilience by enhancing nature networks and maximising the potential for restoration.</p>	<p>species, it is expected that no negative significant effect in regard to the bird habitat via hydrological means is likely to occur.</p>
<p>Policy 4 Natural Places</p>	<p>a) Development proposals which by virtue of type, location or scale will have an unacceptable impact on the natural environment, will not be supported.</p> <p>b) Development proposals that are likely to have a significant effect on an existing or proposed European site (Special Area of Conservation or Special Protection Areas) and are not directly connected with or necessary to their conservation management are required to be subject to an "appropriate assessment" of the implications for the conservation objectives.</p> <p>c) Development proposals that will affect a National Park, National Scenic Area, Site of Special Scientific Interest or a National Nature Reserve will only be supported where:</p> <p>i. The objectives of designation and the overall integrity of the areas will not be compromised; or</p> <p>ii. Any significant adverse effects on the qualities for which the area has been designated are clearly outweighed by social, environmental or economic benefits of national importance.</p>	<p>Mitigation through design has sought to reduce the impacts on the natural environment. During the design mitigation stage the following key ecological sensitivities were identified in the vicinity of the Site:</p> <ul style="list-style-type: none"> • potential effects on sensitive habitats through habitat loss, fragmentation and degradation, including peat forming habitats. • potential effects on protected species e.g. mammals, fish, etc.; • cumulative effects as arising from the addition of the proposed development in combination with other relevant projects; and • potential effects on statutory sites within 5km designated for ecological interests <p>The proposed development has been designed to reduce the potential for ecological effects by avoiding more sensitive ecological interest features including:</p> <ul style="list-style-type: none"> • avoidance of areas of deeper peat - this has reduced the habitat loss of more sensitive higher quality habitats such as blanket bog; • avoidance of areas of sensitive habitat – these areas have been buffered by 30m and turbines and infrastructure



Policy	Relevant Policy Text	Analysis/ Where Addressed in EIA Report
	<p>...</p> <p>d) Development proposals that affect a site designated as a local nature conservation site or landscape area in the LDP will only be supported where:</p> <p>I. Development will not have significant adverse effects on the integrity of the area or the qualities for which it has been identified; or</p> <p>II. Any significant adverse effects on the integrity of the area are clearly outweighed by social, environmental or economic benefits of at least local importance.</p> <p>...</p> <p>f) Development proposals that are likely to have an adverse effect on species protected by legislation will only be supported where the proposal meets the relevant statutory tests. If there is reasonable evidence to suggest that a protected species is present on a site or may be affected by a proposed development, steps must be taken to establish its presence. The level of protection required by legislation must be factored into the planning and design of development, and potential impacts must be fully considered prior to the determination of any application.</p> <p>g) Development proposals in areas identified as wild land in the Nature Scot Wild Land Areas map will only be supported where the proposal:</p> <p>I. will support meeting renewable energy targets; or,</p> <p>II. is for small scale development directly linked to a rural business or croft, or is required to support a fragile community in a rural area.</p> <p>...</p>	<p>relocated to avoid any impact on these areas.</p> <ul style="list-style-type: none"> • avoidance of watercourses – these have been buffered by 50m, apart from locations where access tracks unavoidably need to cross watercourses. • avoidance of any potential areas of GWDEs and sensitive habitats; and • Avoidance of badger setts – all setts found during the baseline surveys have been avoided by a minimum 100m buffer. <p>Further information on this is available in EIA Report Chapter 3 Site Selection and Design Evolution.</p> <p>Potential effects on SACs and SSSIs have been scoped out of assessment as the features that these sites have been designated for are not predicted to be impacted by the proposed development. Further information on this is available in EIA Report Chapter 8: Ecology Assessment and EIA Report Chapter 9: Ornithology Assessment.</p> <p>The Site is not located with a National Park, National Scenic Area or National Nature Reserve, and the study area for the proposed development does not include a National Park. The Site is not located within a NatureScot Wild Land Area. With mitigation through design, it is not anticipated that the proposed development will negatively impact surrounding ecological designated sites.</p> <p>As set out in EIA Report Chapter 8: Ecology Assessment and EIA Report Chapter 9: Ornithology Assessment, with the imposition of recommended mitigation measures, no significant adverse effects on protected species are predicted as a result of the proposed development.</p> <p>Overall, it is considered that the proposed development is in accord with Policy 4 of the NPF4.</p>



Policy	Relevant Policy Text	Analysis/ Where Addressed in EIA Report
Policy 5 Soils	<p>a) Development proposals will only be supported if they are designed and constructed:</p> <ul style="list-style-type: none"> i. In accordance with the mitigation hierarchy by first avoiding and then minimising the amount of disturbance to soils on undeveloped land; and ii. In a manner that protects soil from damage including from compaction and erosion, and that minimises soil sealing. <p>...</p> <p>c) Development proposals on peatland, carbon rich soils and priority peatland habitat will only be supported for:</p> <ul style="list-style-type: none"> i. Essential infrastructure and there is a specific locational need and no other suitable site; ii. The generation of energy from renewable sources that optimises the contribution of the area to greenhouse gas emissions reductions targets; iii. Small-scale development directly linked to a rural business, farm or croft; iv. Supporting a fragile community in a rural or island area; or v. Restoration of peatland habitats <p>d) Where development on peatland, carbon-rich soils or priority peatland habitat is proposed, a detailed site specific assessment will be required to identify:</p> <ul style="list-style-type: none"> i. the baseline depth, habitat condition, quality and stability of carbon rich soils; ii. the likely effects of the development on peatland, including on soil disturbance; and iii. the likely net effects of the development on climate emissions and loss of carbon. <p>...</p>	<p>An extensive programme of peat probing has been undertaken across the Site to assess the depth and stability of carbon rich soils. This has been supplemented by a walk-over survey and a thorough inspection of digital terrain mapping and aerial photography. An ecological assessment of peat and its associated habitats has also been completed.</p> <p>At various points during design development, fieldwork has been undertaken to provide feedback to the project team with regards to peat depth and stability at locations of proposed infrastructure which fed into the iterative design of the proposed development. This has resulted in the proposed development only impacting on 0.07ha of peatland.</p> <p>EIA Report Technical Appendix 8.6: Outline Biodiversity Enhancement and Restoration Plan has identified potentially 34 ha of land within the Site that would be suitable for restoration of degraded peatland habitat.</p> <p>An assessment of the likely impacts of the proposed development on peat is contained within EIA Report Chapter 10: Geology, Hydrology and Hydrogeological Assessment. It concludes that subject to best practice construction techniques being implemented, impacts on soils are not considered to be significant.</p> <p>Net emissions of carbon dioxide (carbon losses minus carbon gains) per annum is 237,689 CO₂ eq.</p>



Policy	Relevant Policy Text	Analysis/ Where Addressed in EIA Report
<p>Policy 6 – Forestry Woodlands and Trees</p>	<p>a) Development proposals that enhance, expand and improve woodland and tree cover will be supported.</p> <p>b) Development proposals will not be supported where they will result in</p> <ul style="list-style-type: none"> i. Any loss of ancient woodlands, ancient and veteran trees, or adverse impact on their ecological condition; ii. Adverse impacts on native woodlands, hedgerows and individual trees of high biodiversity value, or identified for protection in the Forestry and Woodland Strategy; iii. Fragmenting or severing woodland habitats, unless appropriate mitigation measures are identified and implemented in line with the mitigation hierarchy; and iv. Conflict with Restocking Direction, Remedial Notice or Registered Notice to Comply issued by Scottish Forestry. <p>c) Development proposals involving woodland removal will only be supported where they will achieve significant and clearly defined additional public benefits in accordance with relevant Scottish Government policy on woodland removal. Where woodland is removed, compensatory planting will most likely be expected to be delivered.</p> <p>d) Development proposals on sites which include an area of existing woodland or land identified in the Forestry and Woodland Strategy as being suitable for woodland creation will only be supported where the enhancement and improvement of woodlands and the planting of new trees on the site (in accordance with the Forestry and Woodland Strategy) are integrated into the design.</p>	<p>The proposed development is located in a commercial forestry. Due to the existing nature of the Site, the environmental significance of the area has been degraded. Notwithstanding the current nature of the Site, several historic areas of ancient woodland are indicated on the Site. These areas have been removed historically and are now a mix of conifer plantation and areas of young plantation. The outline BERP at EIA Report Technical Appendix 8.6 proposes that low intensity native broadleaf woodland planting is undertaken within the northwestern historical ancient woodland pocket. Restoration within this area will take advantage of the potential seedbanks already present within this areas. Consultation with Forestry and Land Scotland will confirm the species assemblage.</p> <p>The proposed development would require approximately 158.8ha of woodland to be directly felled in order to facilitate the construction of wind turbines and associated infrastructure. While a keyhole approach is favoured, it is anticipated that a small number of mature forestry coupes may require to be clear-felled to the nearest windfirm edge to allow for the construction of the proposed development. Replanting would then take place up to the keyhole area.</p> <p>In areas where a young crop has been recently planted, keyholing into the young crop will be possible and tree felling kept to a minimum.</p> <p>Following construction, the majority of felled areas will be replanted, however, a 100m radius from each turbine location within woodland will be maintained and kept clear of trees for operation and maintenance. Further details are provided in Technical Appendix 3.2: Forestry. Compensatory planting in line with the Scottish Government’s Policy on Control of Woodland Removal would take place to ensure there is no net loss of woodland.</p>



Policy	Relevant Policy Text	Analysis/ Where Addressed in EIA Report
<p>Policy 7 – Historic Assets and Places</p>	<p>a) Development proposals with a potentially significant impact on historic assets or places will be accompanied by an assessment which is based on an understanding of the cultural significance of the historic asset and/or place. The assessment should identify the likely visual or physical impact of any proposals for change, including cumulative effects and provide a sound basis for managing the impacts of change. Proposals should also be informed by national policy and guidance on managing change in the historic environment, and information held within Historic Environment Records.</p> <p>...</p> <p>d) Development proposals in or affecting conservation areas will only be supported where the character and appearance of the conservation area and its setting is preserved or enhanced. Relevant considerations include the:</p> <p>i. architectural and historic character of the area;</p> <p>ii. existing density, built form and layout; and</p> <p>iii. context and siting, quality of design and suitable materials.</p> <p>...</p> <p>h) Development proposals affecting scheduled monuments will only be supported where:</p> <p>i. direct impacts on the scheduled monument are avoided;</p> <p>ii. significant adverse impacts on the integrity of the setting of a scheduled monument are avoided; or</p> <p>iii. exceptional circumstances have been demonstrated to justify the impact on a scheduled monument and its setting and impacts on the monument or its setting have been minimised.</p>	<p>EIA Report Chapter 7: Cultural Heritage Assessment assesses the effects of construction and operation of the proposed development on the cultural heritage assets of the Site and surrounding area.</p> <p>There are no nationally or regionally important designated heritage assets within the Site or 1km of the Site. There are 65 heritage assets of national importance within 10km and there are 41 Category B Listed Buildings and 3 Conservation Areas. Through consultation with the Aberdeenshire Council Archaeology Service and Historic Environment Scotland, it was agreed that 16 of these assets were to be considered in detail within the heritage assessment.</p> <p>Mitigation through design of the development has taken place, as outlined in EIA Report Chapter 3: Design Evolution and Alternatives. Through these mitigations, no assets have presented with a Moderate or above Significance of Effect, nor to a degree that would reduce the ability to understand or appreciate those assets or that the integrity of their setting be so adversely impacted.</p> <p>There are three Conservation Areas within 5km of the Site boundary. Through correspondence with HES and ACAS, it was agreed through a heritage appraisal (Technical Appendix 7.2) that only the Berryhillock Conservation Area required further assessment. The Conservation Area is considered to be of medium (regional) importance. It is predicted that the operation of this proposed development would result in a Very low Adverse Magnitude of impact on the Conservation Area based on the contributing factors to its significance and therefore as concluded in the EIA Report Chapter 7: Cultural Heritage Assessment has an overall significance of effect as Negligible.</p> <p>There are 20 Scheduled Monuments within 10km of the Site boundary, five of which required further assessment, that being:</p> <ul style="list-style-type: none"> • Davie’s Castle (SM11042) • St John’s Church and Tower of Deskford, Deskford (SM90095) • Ha’ Hillock, motte (SM11046)



Policy	Relevant Policy Text	Analysis/ Where Addressed in EIA Report
	<p>i) Development proposals affecting nationally important Gardens and Designed Landscapes will be supported where they protect, preserve or enhance their cultural significance, character and integrity and where proposals will not significantly impact on important views to, from and within the site, or its setting.</p> <p>...</p> <p>o) Non-designated historic environment assets, places and their setting should be protected and preserved in situ wherever feasible. Where there is potential for non-designated buried archaeological remains to exist below a site, developers will provide an evaluation of the archaeological resource at an early stage so that planning authorities can assess impacts. Historic buildings may also have archaeological significance which is not understood and may require assessment.</p>	<ul style="list-style-type: none"> • Inaltry, castle 20m NNW of (SM11178) • Durn Hill (SM13748) <p>It was concluded in the EIA Report Chapter 7: Cultural Heritage Assessment that the magnitude of impact for all five scheduled monuments is anticipated to be very low adverse, and as such, the significance of effect is very slight.</p> <p>There are two nationally important Gardens and Designated Landscapes within 10km of the Site boundary, that being Gordon Castle (GDL00198) and Cullen House (GDL00121).</p> <p>The magnitude of impact upon both Gordon Castle and Cullen House would be very low adverse, resulting in a significance of effect of very slight.</p> <p>Through consultation, two non-designated heritage assets were required to undergo an assessment of potential effects, that being Meiklehill (NJ46SW0001) and Tor Sliasg (NJ45NW0001). The magnitude of impact upon the Meiklehill would be none, resulting in a significance of effect of nil. The magnitude of impact for Tor Sliasg would be Low Adverse Magnitude based on the contributing factors to the asset's significance, resulting in a significance of effect of Very Slight.</p>
<p>Policy 14: Design, Quality and Place</p>	<p>a) Development proposals will be designed to improve the quality of an area whether in urban or rural locations and regardless of scale.</p> <p>b) Development proposals will be supported where they are consistent with the six qualities of successful places:</p> <p>Healthy: Supporting the prioritisation of women's safety and improving physical and mental health.</p> <p>Pleasant: Supporting attractive natural and built spaces.</p> <p>Connected: Supporting well connected networks that make moving around easy and reduce car dependency.</p> <p>Distinctive: Supporting attention to detail of local architectural styles and natural landscapes to be interpreted,</p>	<p>The proposed development would be consistent with the highlighted qualities of successful places, primarily through facilitating the Moray area becoming a 'sustainable' place, including improving climate resilience.</p> <p>Through the proposed development Site selection and alternative designs, impacts to views from key locations have been minimised.</p> <p>The proposed development includes an annual community benefit payment of £5,000 per MW, equating to £528,000 per year or £18,400,000 over the proposed 35 year life of the wind farm. This community benefit fund could help support initiatives in the surrounding areas that would be consistent with the highlighted qualities of successful places.</p>



Policy	Relevant Policy Text	Analysis/ Where Addressed in EIA Report
	<p>literally or creatively, into designs to reinforce identity.</p> <p>Sustainable: Supporting the efficient use of resources that will allow people to live, play, work and stay in their area, ensuring climate resilience, and integrating nature positive, biodiversity solutions.</p> <p>Adaptable: Supporting commitment to investing in the long-term value of buildings, streets and spaces by allowing for flexibility so that they can be changed quickly to accommodate different uses as well as maintained over time.</p> <p>...</p>	
<p>Policy 23: Health and Safety</p>	<p>...</p> <p>e) Development proposals that are likely to raise unacceptable noise issues will not be supported. The agent of change principle applies to noise sensitive development. A Noise Impact Assessment may be required where the nature of the proposal or its location suggests that significant effects are likely.</p> <p>...</p>	<p>Commentary in relation to noise is set out against Policy 11(e) (in Table 6-2). It states that no unacceptable effects in terms of noise would be introduced by the proposed development.</p>
<p>Policy 25 Productive Places</p>	<p>a) Development proposals which contribute to local or regional community wealth building strategies and are consistent with local economic priorities will be supported. This could include for example improving community resilience and reducing inequalities; increasing spending within communities; ensuring the use of local supply chains and services; local job creation; supporting community led proposals, including creation of new local firms and enabling community led ownership of buildings and assets.</p> <p>b) Development proposals linked to community ownership and management of land will be supported.</p>	<p>EIA Report Chapter 13: Socio-economic, Land Use and Tourism sets out the predicted socio-economic benefits of the proposed development.</p> <p>Key points include:</p> <ul style="list-style-type: none"> • community benefit payments of approximately £18.4 million over the lifetime of the wind farm; • £5.8 million of net Gross Value Added (GVA) to the Moray Council administrative area over the course of the 18 month construction period; and • a total of 86 person-years of net additional temporary employment is predicted to be generated in the Moray economy during the construction period and installation phase of the proposed project. The figure for the whole of Scotland (including the Moray Council administrative area) is 232 person-years of net additional temporary employment; and a



Policy	Relevant Policy Text	Analysis/ Where Addressed in EIA Report
		<p>total of between 20 and 27 permanent (direct and indirect) jobs in the Moray area.</p> <p>Furthermore, it is anticipated that a wide selection of supply chain businesses could expect to benefit from the investment in the local and Scottish economies. This may include services such as ground and road maintenance, catering, building trades and plant hire.</p> <p>The Applicant has offered shared ownership as part of the proposed development. This potential is also identified in Chapter 13.</p>
<p>Policy 29 Rural Development</p>	<p>...</p> <p>b) Development proposals in rural areas should be suitably scaled, sited and designed to be in keeping with the character of the area. They should also consider how the development will contribute towards local living and take into account the transport needs of the development as appropriate for the rural location.</p> <p>...</p>	<p>The landscape and visual impact of the proposed development is addressed in EIA Report Chapter 6 Landscape and Visual Impact Assessment.</p> <p>The assessment concluded that:</p> <p><i>Significant effects arising from the proposed development will be localised – affecting landscape and visual receptors within 5km of the turbine locations. No nationally or regionally important receptors will be significantly affected.</i></p> <p>The localised impacts from the proposed development, are considered to be acceptable in accordance with Policy 11(e)(ii).</p> <p>Furthermore, the proposed development is a redesign/enlargement of an approved onshore wind farm. If the development as envisaged by the extant consent was to be constructed there would be 13 wind turbines at the Site. Therefore, it is considered the proposal is suitably sited and in keeping with the area.</p>

6.2.5 NPF4 Conclusions

128. Policy 11 is the key topic specific policy for the assessment of the proposed development. In principle it is supportive of a wind farm with associated BESS on this Site given it is not within a National Park or National Scenic Area.
129. It has been identified that there are localised visual impacts as a result of the proposed development. The localised visual impacts are seen on the recreation route Bore Path KT01 – Burn of Aultmore and have a major/moderate impact on the LCT Low Forested Hills and Upland Farmland and Rolling Coastal Farmland. It has been acknowledged in this Planning Statement the significant weight that the NPF4 gives to the delivery of renewable energy and to tackling the climate crisis; Scottish Ministers must balance the potential adverse impacts of renewable energy development projects and the positive contribution of these developments in assisting in tackling the climate crisis.



130. Recent planning decisions have reinforced the support NPF4 provides to renewable developments. For example, on the 21 August 2023 Scottish Ministers granted consent under section 36 of the Electricity Act 1989 for the '*Construction and Operation of Shepherds Rig Wind Farm within the Planning Authority Area of Dumfries and Galloway*' (WIN-170-2005). The application had been considered at public inquiry in late 2021 with the Reporters' Public Inquiry Report recommending refusal of section 36 consent and deemed planning permission due to several factors including the significant adverse landscape and visual effects the development would have on the special qualities of the Galloway Hills Regional Scenic Area. In November 2022, Scottish Ministers instructed the Reporters to reopen the inquiry due to the introduction of the draft NPF4. The supplementary report by the Reporters still concluded that the proposal would have adverse landscape and visual impacts and found the impacts were greater than localised. Nonetheless, due to the introduction of the NPF4, considerable weight was placed on renewable energy projects and tackling the climate crisis. Therefore, the Reporters under the NPF4 considered the weight of tackling the climate change crisis was greater than the visual and landscape impacts and recommended the application be approved. This case reinforced the weight NPF4 provides to tackling the climate crisis and should be adopted for this proposed development.
131. Overall, it is considered that the proposed development would accord with the relevant policies of NPF4, and with NPF4 when read as a whole.

6.3 The Local Development Plan

132. In addition to NPF4, the statutory Development Plan applicable to the proposed development comprises the adopted Moray Local Development Plan (MLDP) (2020) and the associated statutory Supplementary Guidance. The MLDP was formally adopted on 27 July 2020 and sets out how the Moray Council sees the MLDP area developing over the next 10 years and beyond. As provided for by section 24(3) of the Town and Country Planning (Scotland) Act 1997, as amended, where there is any inconsistency between the local development plan and NPF4, then whichever of them is later in date will prevail, therefore in this case NPF4 would prevail. Moray Council is currently developing a new Local Development Plan, which is aligned with NPF4, and is expected to be adopted in 2027.
133. The primary MLDP policy for assessment of the proposed development is Policy DP9 Renewable Energy. In addition, the MLDP includes a number of other policies relating to environmental and design consideration including:
- PP2 Sustainable Economic Growth;
 - EP1 Natural Heritage Designations;
 - EP2 Biodiversity;
 - EP3 Special Landscape Areas and Landscape Character;
 - EP7 Forestry, Woodlands and Trees;
 - EP8 Historic Environment;
 - EP9 Conservation Areas;
 - EP10 Listed Buildings;
 - EP12 Management and Enhancement of the Water Environment;
 - EP13 Foul Drainage; and
 - EP14 Pollution, Contamination & Hazards.
 - EP16: Geodiversity and Soil Resources



6.3.1 Policy DP9 Renewable Energy

134. Policy DP9 states the following:

All renewable energy proposals will be considered favourably where they meet the following criteria:

- i) They are compliant with policies to safeguard and enhance the built and natural environment;*
- ii) They do not result in the permanent loss or permanent damage of prime agricultural land;*
- iii) They avoid or address any unacceptable significant adverse impacts including:*

- *Landscape and visual impacts.*
- *Noise impacts.*
- *Air quality impacts.*
- *Electromagnetic disturbance.*
- *Impact on water environment.*
- *Impact on carbon rich soils and peat land hydrology.*
- *Impact on woodland and forestry interests.*
- *Traffic impact -mitigation during both construction and operation.*
- *Ecological Impact.*
- *Impact on tourism and recreational interests.*

In addition to the above criteria, detailed assessment of impact will include consideration of the extent to which the proposal contributes to renewable energy generation targets, its effect on greenhouse gas emissions and net economic impact, including socio-economic benefits such as employment.

b) Onshore wind turbines

In addition to the assessment of the impacts outlined in part a) above, the following considerations will apply:

i) The Spatial Framework

Areas of Significant Protection (Map 2): where the Council will apply significant protection and proposals may be appropriate in circumstances where any significant effects on the qualities of these areas can be substantially overcome by siting, design and other mitigation.

Areas with Potential (Map 1): where proposals are likely to be acceptable subject to Detailed Consideration.

ii) Detailed Consideration

The proposal will be determined through Site specific consideration of the following on which further guidance will be set out in supplementary guidance and as informed by the landscape capacity study:

Landscape and visual impact:

- *the landscape is capable of accommodating the development without unacceptable significant adverse impact on landscape character or visual amenity.*
- *the proposal is appropriate to the scale and character of its setting, respects the main features of the Site and the wider environment and addresses the potential for mitigation.*

Cumulative impact



- unacceptable significant adverse impact from two or more wind energy developments and the potential for mitigation is addressed.

Impact on local communities

- the proposal addresses unacceptable significant adverse impact on communities and local amenity including the impacts of noise, shadow flicker, visual dominance and the potential for associated mitigation.

Other

- the proposal addresses unacceptable significant adverse impacts arising from the location within an area subject to potential aviation and defence constraints including flight paths and aircraft radar.
- the proposal avoids or adequately resolves other impacts including on the natural and historic environment, cultural heritage, biodiversity, forest and woodlands and tourism and recreational interests - core paths, visitor centres, tourist trails and key scenic routes.
- the proposal addresses any physical Site constraints...”

135. The policy provides further criteria for onshore wind farms, which the proposed development is assessed against in **Table 6-4**.

Table 6-4 Moray Local Development Plan – DP9 Renewable Energy

Policy	Relevant Policy Text	Analysis/ Where Addressed in EIA Report
DP9 (b) Onshore wind turbines		
Landscape and visual impact	<p><i>the landscape is capable of accommodating the development without unacceptable significant adverse impact on landscape character or visual amenity.</i></p> <p><i>The proposal is appropriate to the scale and character of its setting, respects the main features of the site and the wider environment and addresses the potential for mitigation.</i></p>	<p>The landscape and visual impact of the proposed development is addressed in EIA Report Chapter 6 Landscape and Visual Impact Assessment.</p> <p>The assessment concluded that:</p> <p><i>Significant effects arising from the proposed development will be localised – affecting landscape and visual receptors within 5km of the turbine locations. No nationally or regionally important receptors will be significantly affected.</i></p> <p>There is inconsistency between MLDP Policy DP9(b) and NPF4 Policy 11, with the NPF4 recognising that significant landscape and visual impacts are to be expected for some forms of renewable energy onshore wind farms . In accordance with section 24(3) of the Town and Country Planning (Scotland) Act 1997, as amended, the NPF4 policy prevails. The localised significant impacts from the development are consistent with the policy test in NPF4 Policy 11(e)(ii) as described in Section 6.2.4.2.</p>
Cumulative Impact	<p><i>unacceptable significant adverse impact from two or more wind energy developments and the potential for mitigation is addressed.</i></p>	<p>No significant cumulative impacts are anticipated with the construction and operation of the proposed development.</p> <p>Each technical chapter within the EIA Report has undertaken an assessment of the potential cumulative impacts. No significant cumulative impacts were identified or anticipated once appropriate mitigations measures were adopted.</p>



Policy	Relevant Policy Text	Analysis/ Where Addressed in EIA Report
Impact on Local Communities	<p><i>the proposal addresses unacceptable significant adverse impact on communities and local amenity including the impacts of noise, shadow flicker, visual dominance and the potential for associated mitigation.</i></p>	<p>EIA Report Technical Appendix 6.5: Residential Visual Amenity Assessment summarises the findings of an assessment of visual effects on residential amenity within approximately 2km of the proposed turbines. Overall, it concludes that no residential property would receive effects of the highest magnitude and do not have the potential to reach the Residential Visual Amenity threshold.</p> <p>EIA Report Chapter 12: Acoustic Assessment sets out the methodology, assessment and subsequent findings of the noise impact assessment for the proposed development. It also takes into account the cumulative wind energy developments in the study area. The assessment concludes that wind turbine noise immission levels do not exceed the ESTU-R-97 criterion and thereby, the effects would be not significant.</p> <p>Potential shadow flicker effects have been considered within EIA Report Chapter 15: Other Issues including Shadow Flicker and Telecommunications. The nearest residential receptor to the proposed development is located approximately 856m from Turbine T5. The shadow flicker assessment shows that there is potential for significant shadow flicker effects (30 hours of shadow flicker effect per annum) to occur at one (consented but not yet built) nearby property as a result of the proposed development, based on a worst-case scenario. The applicant has committed to installing shadow flicker shut down modules at each turbine in order to mitigate against any effects.</p>
Other	<p><i>the proposal addresses unacceptable significant adverse impacts arising from the location within an area subject to potential aviation and defence constraints including flight paths and aircraft radar.</i></p>	<p>EIA Report Chapter 14 Aviation and Radar considers potential effects of the proposed development on aviation. The assessment identified the following aviation receptors that potentially would be subject to significant effects:</p> <ul style="list-style-type: none"> • the RAF Lossiemouth primary surveillance radar (PSR); • the RAF Lossiemouth precision approach radar (PAR); • the air defence PSR at Remote Radar Head (RRH) Buchan; • the Inverness Airport PSR; • the instrument flight procedures (IFPs) associated with Aberdeen Airport, Inverness Airport and RAF Lossiemouth; and • military aircraft flying at low level. <p>No significant impacts are anticipated on these aviation receptors through the adoption of mitigation measures. These mitigation measures, which are outlined in EIA Report Chapter 14: Aviation and Radar include:</p> <ul style="list-style-type: none"> • radar trials to be undertaken at RAF Lossiemouth. Should the effects of the proposed development on



Policy	Relevant Policy Text	Analysis/ Where Addressed in EIA Report
	<p><i>the proposal avoids or adequately resolves other impacts including on the natural and historic environment, cultural heritage, biodiversity, forest and woodlands and tourism and recreational interests - core paths, visitor centres, tourist trails and key scenic routes.</i></p> <p><i>the proposal addresses any physical site constraints and appropriate provision for decommissioning and restoration.</i></p>	<p>the air defence radar be determined to be unacceptable, a standard method of mitigation is available in the shape of a Non-Auto Initiation Zone (NAIZ) applied to the airspace overhead the wind farm; and</p> <ul style="list-style-type: none"> • a reduced lighting scheme that has been approved by CAA. <p>The proposed development is not considered to have significant impacts on the natural and historic environment, cultural heritage, biodiversity, forest and woodlands and tourism and recreation. It has been identified that the core path <i>Bore Path KT01-Burn of Aultmore</i> will have major/moderate visual effects as a result of the proposed development.</p> <p>There is inconsistency between MLDP Policy DP9(b) and NPF4 Policy 11, , with the NPF4 recognising that significant landscape and visual impacts are to be expected for some forms of renewable energy onshore wind farms. In accordance with section 24(3) of the Town and Country Planning (Scotland) Act 1997, as amended, the NPF4 policy prevails. These impacts are localised, and in accordance with Policy 11(e)(ii) of NPF4, it is acknowledged that such impacts are to be expected for renewable developments such as wind farms.</p> <p>The proposed development has been subject to an extensive design iteration process in response to the constraints identified as part of baseline studies undertaken on the Site. This has included revising the location of turbines and infrastructure to avoid areas of deeper peat, residential receptors and areas considered to be ecologically sensitive. Further detail is available in EIA Report Chapter 3: Design Evolution and Alternatives.</p>

136. The proposed development is aligned with the key planning policies of the Moray Local Development Plan 2020, in particular DP9 Renewable Energy. As advised previously, the MLDP was formally adopted on 27 July 2020, while the NPF4 was adopted by the Scottish Government on 13 February 2023. As provided for by section 24(3) of the Town and Country Planning (Scotland) Act 1997, as amended, where there is any inconsistency between the local development plan and NPF4, then whichever of them is later in date will prevail, therefore in this case NPF4 would prevail.

6.3.2 Moray Wind Energy Landscape Sensitivity Study 2023

137. The Moray Wind Energy Landscape Sensitivity Study 2023 (MWELSS) provides guidance on the capacity of the local landscape in Moray to accommodate wind turbines. The MWELSS supersedes the Moray Onshore Wind Energy (MOWE) Non-Statutory Guidance 2020 and the Moray Wind Energy Landscape Capacity Study (LCS) 2017 and is a material consideration in the determination of planning applications and to inform responses to section 36 consultations.
138. As made clear in the supporting text to Policy DP9 of the MLDP, the MWELCS (now MWELSS) is intended to be used as a supportive study that provides strategic level guidance. It is therefore not intended to be used to replace proposal-specific detailed assessment



contained in an individual Landscape and Visual Impact Assessment. Section 1.7 of the MWELSS states *“The assessment identifies constraints and opportunities at a strategic scale and Landscape and Visual Impact Assessment (LVIA) will provide more detailed assessment of specific wind energy developments”*.

139.

140. The Site is identified as being situated within the Low Forest Hills assessment unit, which is an area described as comprising ‘predominantly forested broader hills and upland plateaux which contain the lower lying settled bowl of the Upland Farmland which encompass the Isla Valley and its northern tributaries’. The Study assessed the sensitivity to the Low Forest Hills area for onshore wind turbines with tip height in excess of 150m and concluded that there would be a ‘high’ sensitivity in this area to these turbines.

141. The landscape susceptibility criteria for the Low Forest Hills assessment unit (AU) as outlined in the MWELSS is outlined in **Table 6-5**.

Table 6-5 Susceptibility - Low Forest Hills

Criteria	Rating from MWELSS	Comment (quotes are from MWELSS / MWELCS)
Scale	High-medium	<i>“The more expansive plateaux and broad ridges have a large-scale but this is reduced where ridges are narrower and where hills have more defined summits and are generally smaller in extent.”</i>
Landform	High-medium	<i>“smooth, gently graded slopes and subtly rounded indistinct hill tops within broader plateaux. However, more distinctive hills with steeper slopes and defined summits also occur.”</i> The host unit of this LCT is not one of the more defined hills (Lurg Hill, Meikle Balloch and Bin of Cullen are named in the MWELSS) and is considered to be of Medium susceptibility in relation to this criterion.
Land cover	Medium-low	<i>“simple land cover of extensive coniferous forestry with some small areas of moorland”</i>
Built Environment (from MWELCS)	Medium-Low	<i>“sparsely settled landscape with few prominent archaeological and historic built features”</i>
Landscape Context	High	Due to potential effects on <i>“adjacent smaller scale, settled landscapes and the coast”</i> , noting that <i>“In general, the simpler lower-lying plateaux within this AU make a lesser contribution to wider scenic character than the particularly distinctive ‘landmark’ hills of Bin of Cullen and Meikle Balloch.”</i>
Visual Amenity	High	<i>“intrusive if sited on more defined hills which are likely to be popular with walkers and also form key foci in views.”</i> The MWELSS also takes into account potential effects on visual receptors and relationships with adjacent landscapes in reaching this judgement. All of the hills within the LCT form skylines and are judged to be of High/medium susceptibility where not ‘defined’ hills, and High susceptibility otherwise.

142. **EIA Report Chapter 6 Landscape and Visual Impact Assessment** assessed the impacts the proposed development would have on the Low Forested Hills AU. The assessment concluded that there would be significant effects on the unit of 9 Low Forested Hills, as a result of the proximity of the turbines which will become a dominant feature, alongside the forestry, in this small area.



143. There will also be Major/moderate and Adverse effects on Upland Farmland AU which surrounds the forested hills of the Site. These significant effects will primarily arise from the proximity and relatively wide visibility of the turbines within 5km, though there would also be changes as a result of views towards the turbines from the rural areas around Keith.
144. There would also be Major/moderate, Adverse and significant effects on the unit of Rolling Coastal Farmland near Clochan and Drybridge AU. These significant effects will arise as a result of views towards the turbines within 2-5km, particularly from the broader and more open upland areas closer to the Site and in the eastern end of the unit.
145. Although Major/moderate impacts have been identified, they are localised, with impacts within 5km of the turbines. This localised impact is consistent with NPF4, which acknowledges localised impacts are likely to occur with renewable developments, and considers at Policy 11(e)(ii) that where impacts are localised and/or appropriate design mitigation has been applied they will generally be considered acceptable. Furthermore, the weight granted to tackling the climate crises in the NPF4 is greater than the localised visual impacts from the development and therefore the proposed development is considered to be acceptable in landscape and visual terms.

6.3.3 Planning Policy Conclusions

146. The proposed development, due to its size, would have National Development status, as outlined in NPF4. Section 6.2.4 along with **Table 6-1** and **Table 6-2** set out that the proposed development is in accordance with NPF4 Policy 11 'Energy', as well as other relevant policies within NPF4.
147. **Table 6-4** sets out that the proposed development is in accordance with the key renewable energy policy of the Moray Local Development Plan Policy DP9: Renewable Energy.



7.0 Overall Conclusions

7.1 Electricity Act 1989

148. As the proposed development will have an installed capacity of greater than 50MW, the application for consent and deemed planning permission is made to the Scottish Ministers under section 36 of the Electricity Act 1989. Alongside the application for consent, a request is also being made that a direction be issued under section 57(2) of the Town and Country Planning (Scotland) Act 1997, as amended, that planning permission be deemed to be granted
149. Paragraph 3(2) of Schedule 9 to the Electricity Act 1989 states:
- "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; and*
 - 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."*
150. Paragraph 3(1) states:
- "(1) In formulating any relevant proposals, a licence holder or a person authorised by exemption to generate, distribute, supply or participate in the transmission of 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.*
151. Paragraph 3(2) of Schedule 9 provides a specific statutory requirement on the Scottish Ministers to have regard to various matters when considering development proposals. The information that is contained within the EIA Report that accompanies this application addresses these. It is considered that the EIA Report has had regard to the Schedule 9 duties. On this basis Vattenfall Wind Power Limited has fulfilled its obligations under Schedule 9 of the Electricity Act 1989 in this regard.

7.2 Climate Change and Renewable Energy

152. There has been a strong commitment in recent times from governments across the world towards reducing the risks and impacts of climate change. However, a rapidly changing climate has driven many governments to formally declare a 'climate emergency', the UK and Scottish Governments both declaring such climate emergencies in 2019.
153. In response to the declared climate emergency, there has been a step change in policy and attitudes towards the importance of reducing greenhouse gas emissions to combat climate change as soon as possible. This has seen the Scottish Government adopting even more ambitious climate change and renewable energy targets than it had previously set. Statutory targets through the Climate Change (Emissions Reduction Targets) (Scotland) Act 2019 commit Scotland to a new target of net zero emissions of all greenhouse gases by 2045 and a series of interim and annual targets towards this.
154. The evidence clearly shows the scale of the challenge required to meet these targets. The importance of very substantial increases in renewable energy generation to reduce greenhouse gas emissions has therefore been emphatically acknowledged, with the UK Committee on Climate Change identifying that renewable energy generation "*must quadruple*" if net zero targets are to be met. With the onshore wind sector likely to play the



greatest role in achieving this substantial increase in renewable energy generation in the next decade, the Scottish Government's Onshore Wind Policy Statement 2022 has quantified this as requiring 20GW of onshore wind generation by 2030.

155. Renewable energy generation, including domestic onshore wind, also has an important part to play in the UK Government aims to reduce rapidly increasing energy bills and increase energy security, by enabling a reduction in the dependence on imported oil and gas. This is detailed within the UK Government's 'British Energy Security Strategy' (2022)¹⁷.
156. It is therefore concluded that the need case for new renewable generation and storage, in particular onshore wind, has been materially strengthened by the new net zero legislation. That being the case, the contribution the proposed development would make to these targets, by replacing fossil fuel energy generation and thereby reducing greenhouse gas emissions, is a factor in its favour to which substantial weight should be attached in the determination of this application.

7.3 National Planning Policy

157. With regard to planning policy, NPF4 represents a fundamental shift in response to climate change. This has significantly strengthened the planning policy support for renewable energy developments by virtue of a weight of significance that must now be applied to the climate and nature crises when considering development proposals.
158. Policies 1 and 11 of NPF4 provide a supportive and unambiguous basis for decision makers assessing this application. This means that significant weight must be attached to the contribution of the proposed development to meeting renewable energy generation and greenhouse gas emissions reductions targets.
159. It is considered that the proposed development can draw strong policy support from NPF4 for the role it can play in tackling the twin crises of climate emergency and nature crises. Although national development status does not grant consent as per NPF4, the fact that the proposed development holds this status demonstrates the importance of the development.

7.4 Development Plan

160. The MLDP and the MWELSS can be considered generally supportive of renewable energy development, including onshore wind.
161. The proposed development is in accordance with the policies of the MLDP, in particular policy DP9: Renewable Energy. The MWELSS identifies that turbines greater than 150m will have a significant impact on the Low Forest Hills AU. However, through assessment it has been identified that these impacts will be localised which is in accordance with the NPF4.

7.5 Final Conclusion

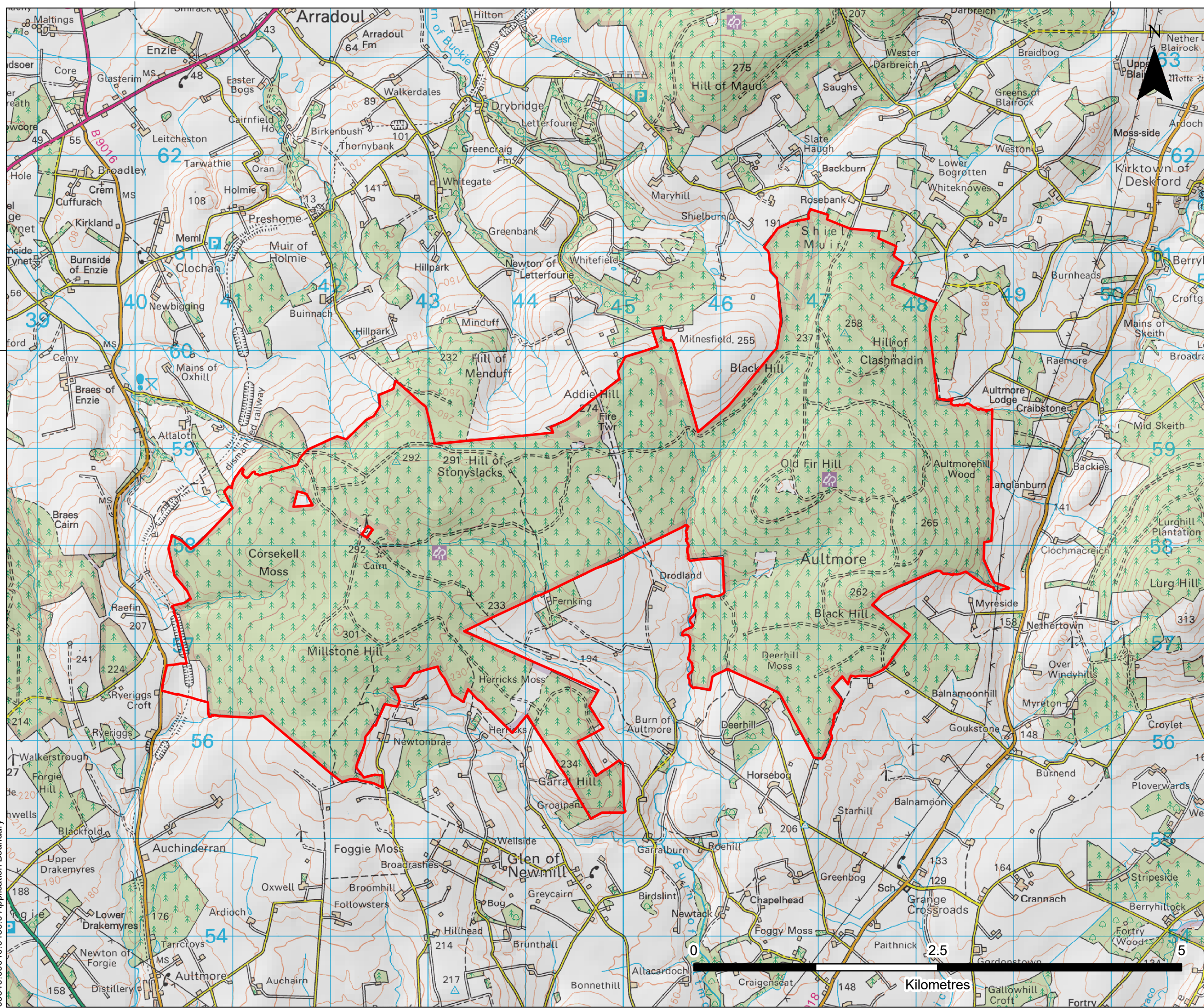
162. The UK and Scottish Government objective is clear in terms of the urgency of the need case for carbon reduction measures, including the requirement for the rapid development of renewable energy. Large schemes (> 50MW) such as the proposed development, which utilise efficient turbines, are located on sites that benefit from high wind speeds, and that have a short carbon payback period, can make significant contributions towards this objective.
163. Given this strong need case, it must surely be demonstrated in terms of the planning balance exercise that if proposals for such schemes are not to be granted consent that they must either be located on unsuitable sites and/or that their adverse environmental impacts must be out of the ordinary or exceptional. As demonstrated throughout this Planning Statement, this is clearly not the case with this proposal.

¹⁷ <https://www.gov.uk/government/publications/british-energy-security-strategy/british-energy-security-strategy>




164. Overall, it is therefore submitted that the proposed development is in accordance with the provisions of the Electricity Act 1989, NPF4 and the other elements of the Development Plan (Local Development Plan and Supplementary Guidance), and that there are no other material considerations that indicate that consent should not be granted. It is considered that any significant effects of the proposed development that have been identified in the EIA Report do not outweigh its positive climate change, renewable energy and socio-economic benefits. On this basis, it is concluded that section 36 consent and deemed planning permission should be granted for the proposed development.






LEGEND

Site Boundary

VATTENFALL 

SLR 

4/5 LOCHSIDE VIEW
EDINBURGH PARK
EDINBURGH
EH12 9DH

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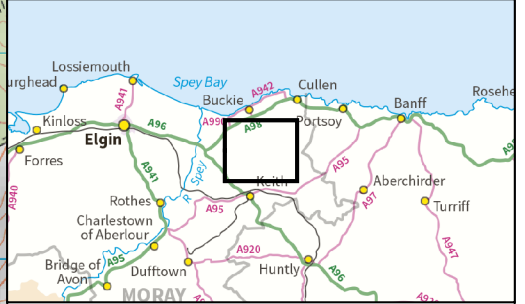
AULTMORE WIND FARM REDESIGN

PLANNING STATEMENT

APPLICATION BOUNDARY

FIGURE 1

Scale 1:36,966 @ A3 Date NOVEMBER 2023





DO NOT SCALE

- KEY**
- SITE BOUNDARY
 - UPGRADED SITE TRACKS
 - NEW SITE TRACKS
 - OVERSAIL AREAS TO BE KEPT CLEAR
 - WTG LOCATIONS
 - INDICATIVE CRANE HARDSTANDING & LAYDOWN AREAS
 - TURNING HEADS
 - INDICATIVE SUBSTATION
 - INDICATIVE TEMPORARY CONSTRUCTION COMPOUNDS
 - INDICATIVE BORROW PITS
 - INDICATIVE BATCHING PLANT

0 200m 400m 600m 800m 1000m
Scale 1:25,000 @ A3

P15	JUNCTION AT COMMS TOWER AMENDED.	PMcG	AM	SGM	05.02.24
P14	SITE BOUNDARY REVISED.	PMcG	AM	SGM	24.01.24
P13	JOB TITLE AMENDED. DRAWING NO. AMENDED TO FIGURE 2.1	PMcG	AM	SGM	26.10.23
P12	RED LINE BOUNDARY AMENDED. AMENDED.	PMcG	AM	SGM	09.10.23
P11	JUNCTION NORTH OF CCT AMENDED. OVERSAIL AT WTG'S AND JUNCTION AMENDED.	PMcG	AM	SGM	07.08.23
P10	SITE BOUNDARY AMENDED.	PMcG	AM	SGM	15.06.23
P9	ALL WTG'S RE-NUMBERED.	PMcG	AM	SGM	13.06.23
P8	T04 LOCATION AMENDED.	PMcG	AM	SGM	06.06.23
P7	MAIN ACCESS TRACK UP TO T10 & T11 WIDENED. SUBSTATION SIZE AMENDED.	PMcG	AM	SGM	31.05.23
P6	SUBSTATION NUMBERS REDUCED. BPL & BATCHING PLANT RELOCATED. SITE ACCESS AMENDED.	PMcG	AM	SGM	16.05.23
P5	T10 & T17 RELOCATED.	PMcG	AM	SGM	01.05.23
P4	EXISTING CONTOURS ADDED. VARIOUS WTG'S RE-ORIENTED TO SUIT. BATCHING PLANT ADDED.	PMcG	AM	SGM	18.04.23
P3	ACCESS TO T9 & T17 AMENDED. ACCESS TRACK AT BP1 & BP3 EXTENDED.	PMcG	AM	SGM	27.03.23
P2	TURBINE LOCATIONS AMENDED. SITE ENTRANCE LOCATION AMENDED. T01 REMOVED.	PMcG	AM	SGM	24.03.23
P1	SITE ENTRANCE RELOCATED.	PMcG	AM	SGM	10.10.22
P0	FIRST ISSUE	PMcG	AM	SGM	25.08.22
Rev	Description	By	CHK'd	App'd	Date

AULTMORE WIND FARM REDESIGN

**PLANNING STATEMENT
SITE LAYOUT**



St Vincent Plaza, 319 St Vincent Street, Glasgow, G2 5LP
tel: +44 (0) 141 227 1700 www.woodplc.com

Scale	1:25,000	Date	AUG 2022	Size	A3
Drawn	PMcG	Checked	AM	Approved	SGM

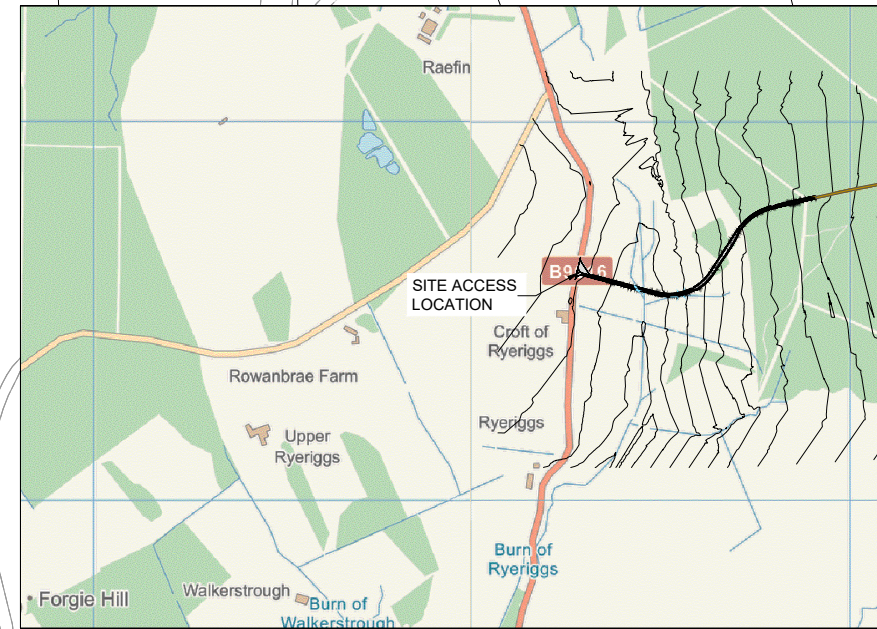
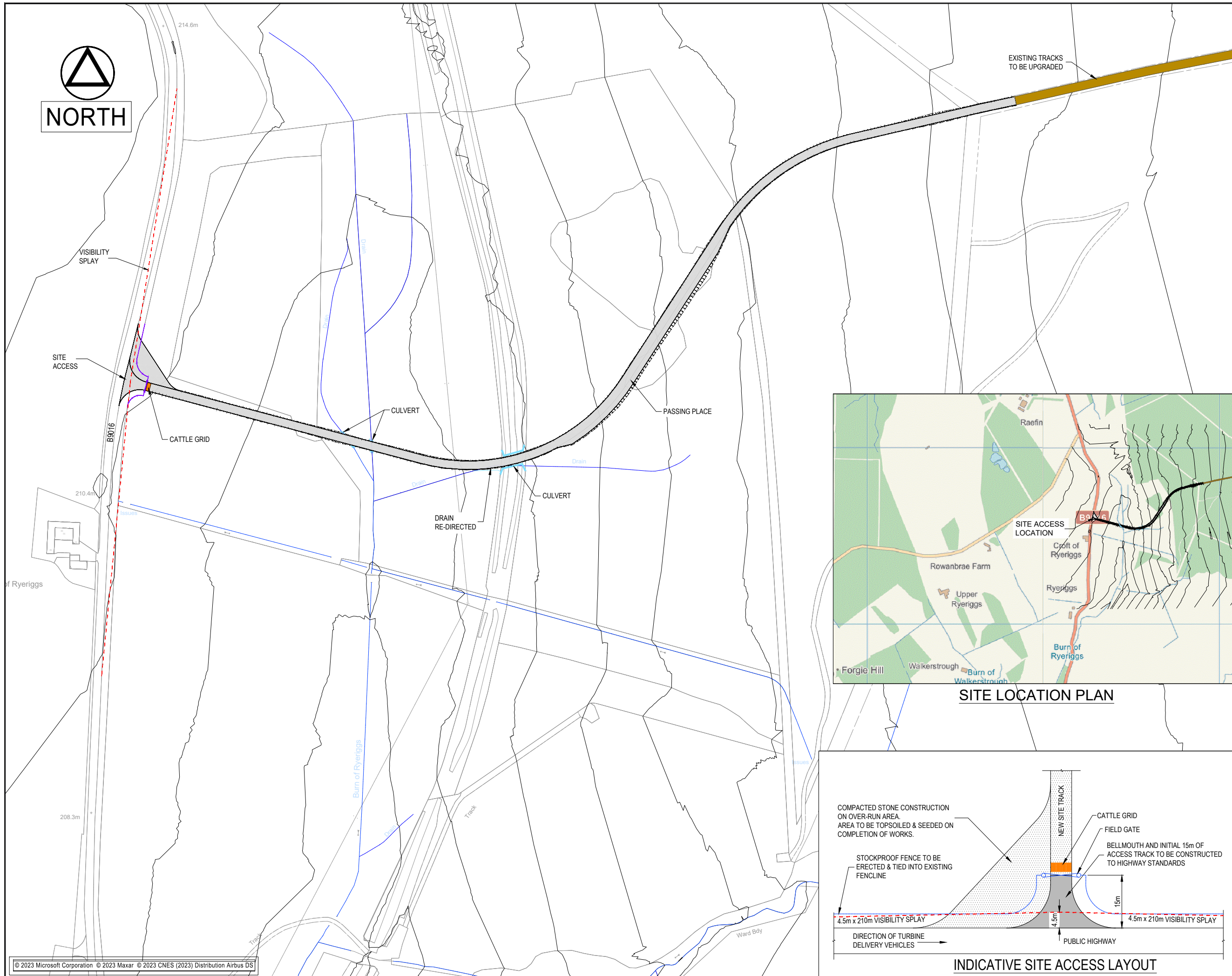
PRELIMINARY

Drawing No.	FIGURE 2	Revision	P15
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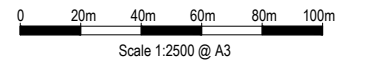
DO NOT SCALE



NORTH



SITE LOCATION PLAN



P3	JOB TITLE AMENDED: DRAWING TITLE AMENDED TO FIGURE 2.13	PMcG	SM	SM	27.10.23
P2	SITE LOCATION PLAN ADDED: IMAGE BACKGROUND REMOVED.	PMcG	SM	SM	04.08.23
P1	SITE ACCESS RELOCATED 60m FURTHER NORTH.	PMcG	SM	SM	16.05.23
P0	FIRST ISSUE	PMcG	SM	SM	02.03.23
Rev	Description	By	Chk'd	App'd	Date

AULTMORE WIND FARM REDESIGN

PLANNING STATEMENT
SITE ENTRANCE

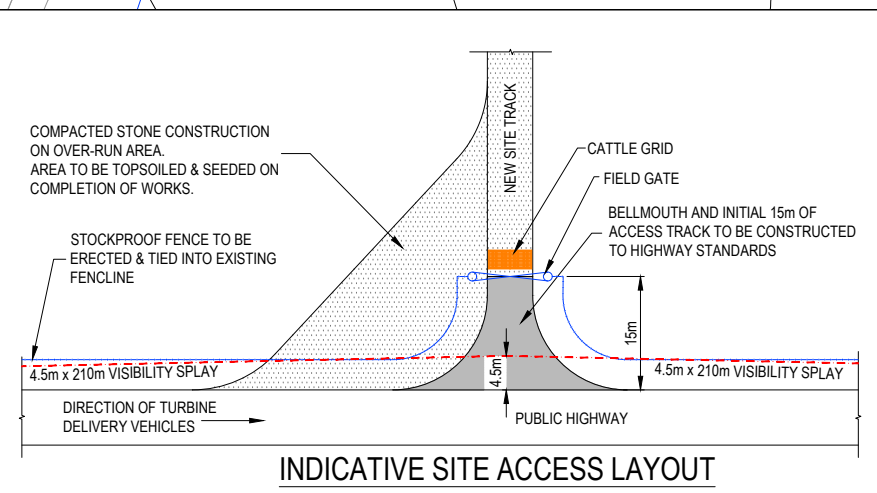


St Vincent Plaza, 319 St Vincent Street, Glasgow, G2 5LP
tel: +44 (0) 141 227 1700 www.woodplc.com

Scale	1:2500	Date	MARCH 2023	Size	A3
Drawn	PMcG	Checked	SM	Approved	SM

PRELIMINARY

Drawing No.	FIGURE 3	Revision	P3
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INDICATIVE SITE ACCESS LAYOUT



Appendix A International and National Climate Change and Renewable Energy Context

Aultmore Wind Farm

Vattenfall Wind Power Limited

SLR Project No.: 405.03640.00016

5 February 2024



A.1 Climate Change and Renewable Energy

The UK and Scottish Governments have made a number of international and domestic commitments in respect of reducing emissions of greenhouse gas to combat climate change. The key agreements in this regard are outlined below.

A.1.1 International Context

United Nations Framework Convention on Climate Change

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

Yearly Conference of the Parties (COP) meetings have taken place to discuss and agree to any new international targets and advisory reports provide regular assessments of the scientific basis of climate change, its impacts, risks and options for mitigation.

COP21 which was held in Paris in December 2015 resulted in a legally binding global climate change target agreed by all member parties with the aim of capping climate change well below 2°C of warming, the ‘2015 Paris Agreement’.

COP26 took place in Glasgow in November 2021 and all attending member parties revisited the climate pledges made under the ‘2015 Paris Agreement’. COP26 concluded with 197 countries agreeing to a new climate deal called the ‘Glasgow Climate Pact’ which strives to keep cutting emissions until they reach net-zero by 2050. All countries agreed to speeding up the pace of climate action this decade and to revisit and strengthen their current emissions targets to 2030.

COP27 took place in Egypt in November 2022 and restated the global commitment to ensuring a strong stance in tackling climate change, especially framed within the context of the current energy crisis. COP27 produced further global commitments to further tackling climate change, but not all decisions were made in a positive direction. Some countries attempted to withdraw their commitment to the targets set at the Paris Agreement, and subsequent ratchetting at COP26. These attempts were not successful, however the commitment for emissions to peak by 2025 was removed – seen by many as a step backwards in the fight against climate change.

Intergovernmental Panel on Climate Change

The most recently published advisory report of relevance to the proposed development is the Intergovernmental Panel on Climate Change (IPCC) Sixth Assessment Report (AR6) (comprising four reports: the Physical Science Basis in August 2021, Impacts, Adaptation and Vulnerability in February 2022, Mitigation of Climate Change in April 2022; and the Synthesis Report in March 2023). AR6 explains in no uncertain terms the challenge that the world faces in addressing climate change and the stark reality of needing to reach net-zero, with real and significant progress by 2030.

A.1.2 UK Context

Net Zero: The UK’s Contribution to Stopping Global Warming (2019)

At COP21, the IPCC was invited to publish a Special Report on the impacts of global warming of 1.5°C and associated greenhouse gas emissions pathways. The IPCC released this Special Report on 08 October 2018. In response to the IPCC’s Special Report, the UK Government requested advice from the Committee on Climate Change (a non-departmental public body that advises the Government on the climate) on the implications of the Paris Agreement. This included requesting advice on what further action was needed to meet the goals of the Paris Agreement.



On 02 May 2019 the Committee on Climate Change published ‘Net Zero: the UK’s Contribution to Stopping Global Warming’. The report made the following recommendations:

- UK overall: a new tougher emissions target of net zero greenhouse gases by 2050, ending the UK’s contribution to global warming within 30 years. This would replace the previous target of an 80% reduction by 2050 from a 1990 baseline.
- Scotland: a target of net zero greenhouse gases economy by 2045, reflecting Scotland’s greater relative capacity to remove emission than the UK as whole.
- A net zero greenhouse gases target for 2050 would deliver on the commitment that the UK made by signing the Paris Agreement.

The UK targets in the report have since been legislated through the Climate Change Act 2008 (2050 Target Amendment) Order 2019, which came into force on 27 June 2019. Prior to this, the UK was committed under the Climate Change Act 2008 to reducing net greenhouse gas emissions by at least 80% of their 1990 levels by 2050.

In terms of the new net-zero targets, the report makes it clear for both the UK and Scotland that *“this is only possible if clear, stable and well-designed policies to reduce emissions further are introduced across the economy without delay.”* It continues that *“current policy is insufficient for even the existing targets.”*

The Committee on Climate Change scenarios for electricity generation estimate that to keep the UK on track to meet its net-zero target, that renewable energy deployment will require a fourfold increase across the UK from current levels. It identifies that this quadrupling of renewable energy will require approximately 22 to 29 gigawatts (GW) of onshore wind capacity by 2030 and solar capacity increased to 23 to 43 GW.

The technical annex to the report specifically addresses integrating variable renewables into the UK electricity system. The annex makes it clear that variable renewable electricity such as large-scale onshore wind energy is now the cheapest form of electricity generation in the UK and can be deployed at scale to meet UK electricity demands.

As part of the 2008 Act, the Climate Change Committee (CCC) advises the UK Government on emissions targets, and reports to the UK Parliament on progress made in reducing Green House Gas emissions. The CCC has set ‘carbon budgets’ for the period from the Climate Change Act 2008 coming into force to 2037. These ‘carbon budgets’ are legally binding targets, set in order to facilitate achieving the 2050 target set out in the Climate Change Act 2008. **Table A-1** sets out all, legally binding, carbon budgets that have been set.

Table A-1: UK Carbon Budgets

Budget	Carbon Budget Level	Reduction Below 1990 Levels	Budget Met?
1 st carbon budget (2008-2012)	3,018 MtCO ₂ e	25%	Yes
2 nd carbon budget (2013-2017)	2,72 MtCO ₂ e	31%	Yes
3 rd carbon budget (2018-2022)	2,544 MtCO ₂ e	37%	On Track
4 th carbon budget (2023-2027)	1,950 MtCO ₂ e	51%	Off Track
5 th carbon budget (2028-2032)	1,725 MtCO ₂ e	57%	Off Track



Budget	Carbon Budget Level	Reduction Below 1990 Levels	Budget Met?
6 th carbon budget (2033-2037)	956 MtCO ₂ e	78%	Off Track
Net Zero Target	100%	By 2050	

The Sixth Carbon Budget

In December 2020 the Committee on Climate Change published ‘The Sixth Carbon Budget’, describing what the potential path options to net zero by 2050 look like and detailing the steps that must be taken to achieve this.

A key recommendation of the report is that the UK Government requires a reduction in UK territorial greenhouse gases of 78% by 2035 relative to 1990 level. The report advises that this can be done through the following four steps:

- Take up of low carbon solutions;
- Expansion of low carbon energy supplies including onshore wind;
- Reducing demand for carbon intensive activities; and
- Land and greenhouse gas removals.

Key benefits for the UK are seen as including the opportunity for low carbon investment, recognised at a time when it is needed to support the UK’s economic recovery from the COVID-19 health crisis.

Page 23 refers to the devolved nations and sets out that “UK climate targets cannot be met without strong policy action across Scotland, Wales and Northern Ireland” and recognises that although the main policy levers are held by the UK Government, that Scotland can take action through complementary measures at the devolved level including supporting policies such as “planning and consenting”.

Carbon Budget Delivery Plan 2023

The Carbon Budget Delivery Plan was published in March 2023 and provides detail on the current package of proposals and policies prepared by the Secretary of State (as of March 2023) to enable the delivery of Carbon Budgets 4, 5 and 6 (as detailed in **Table A-1**).

The Carbon Budget Delivery Plan highlights how crucial renewable energy development is to meeting the Carbon budgets 4, 5 and 6, stating: “Delivering deep decarbonisation of power is key both to delivering sector carbon savings and unlocking the path to net zero across transport, industry, and heating buildings. Meeting growing demand while achieving the goal of decarbonising the power system by 2035 subject to security of supply needs substantial expansion of renewable low carbon generation.”

Row 20 of Table 5 ‘Quantified proposals and policies’ in the Carbon Budget Delivery Plan has the following policy description: “Recognising that onshore wind is an efficient, cheap and widely supported technology, government has consulted on changes to planning policy in England for onshore wind to deliver a localist approach that provides local authorities more flexibility to respond to the views of their local communities. We will respond to the NPPF consultation in due course.”

British Energy Security Strategy 2022

On 07 April 2022 the UK Government released their ‘British Energy Security Strategy’ focusing on how the Government plans to provide the UK with energy security and increased independence from a volatile international market. In Scotland, such planning rules are devolved, with the current Scottish Government considering their own policy of strengthening onshore wind deployment.



Whilst not specifically pushing a boost to onshore wind, the Strategy does note: *"The growing proportion of our electricity coming from renewables reduces our exposure to volatile fossil fuel markets. Indeed, without the renewables we are putting on the grid today, and the green levies that support them, energy bills would be higher than they are now. But now we need to be bolder in removing the red tape that holds back new clean energy developments and exploit the potential of all renewable technologies"*.

The UK Energy White Paper, Powering Our Net-Zero Future

The UK Government published its Energy White Paper 'Powering our Net-Zero Future' in December 2020. The White Paper sets out the UK Government's current thinking on the way in which the UK should work towards meeting its net zero targets. It advises that although retiring capacity will need to be replaced, that modelling suggests overall that the demand for electricity could double as transport and heat switch from petrol/diesel and gas respectively to electricity. It notes that this will require a fourfold increase in low-carbon generation by 2030 if the increased demand and net-zero targets are to be met.

The various actions set out in the White Paper are described as *"a strong signal to project developers and the wider investor community about the government's commitment to deliver clean electricity"*. In the section 'Our Key Commitments', the White Paper states that *"onshore wind and solar will be the key building blocks for the future generation mix, along with offshore wind."*

Net Zero Strategy: Build Back Greener 2021

Net Zero Strategy: Build Back Greener was published on 19 October 2021 and sets out how the UK will deliver on its commitments to meet net zero carbon emissions by 2050. The document brings forward the UK government's intention to fully decarbonise the UK electricity system by 2035 and makes it clear that renewables will be a key focus, with the stated aim of 40GW of offshore wind power by 2030 and the creation of more onshore wind and solar energy supplies.

The government also commits to ending the sale of new petrol and diesel cars and vans by 2030 – declaring that by this point all new cars must be fully zero emissions capable.

Powering Up Britain (2023)

The latest UK Government's statement on 'Powering Up Britain' is to be the blueprint for the future of energy in the UK. It brings together the Energy Security Plan and Net Zero Growth Plan, and explains how the UK will diversify, decarbonise and domesticate energy production by investing in renewables and nuclear, to power Britain from Britain.

Climate Change Committee Progress Report to Parliament (2023)

The most recent Climate Change Committee's progress reports to Parliament 'Progress in reducing emissions' was published in June 2023. As with previous reports, it restates the need for renewable energy and stronger actions on reducing emissions. The report advises that *"Renewable electricity capacity increased in 2022, but not at the rate required to meet the Government's stretching targets, particularly for solar deployment. Given short lead-times, rapid deployment of onshore wind and solar could have helped to mitigate dependence on imported gas during the fossil fuel crisis."*

With regards the speed of onshore wind deployment and constraints to increasing this, the report states *"Both onshore wind and solar deployment are progressing more slowly than offshore wind, in part due to barriers in the planning system, despite being among the cheapest forms of electricity generation."*

The report also speaks positively regarding the trends seen with renewable energy and the UK's historic leadership role stating *"The UK has had an impressive history of climate leadership. However, a muted response to the energy crisis, support for new fossil fuel production and a retreat from public leadership within the COP process all pose risks to the UK's international*



reputation. These must all be addressed to reinstate the UK as a credible, impactful climate leader on the international stage."

A.1.3 Scottish Context

The Scottish Government has continually adopted more ambitious climate change and renewable energy policy and targets than that of the UK Government.

The recently adopted NPF4 (2023, the Government's Onshore Wind Policy Statement (2022), and the draft Energy and Just Transition Plan (2023) are the key drivers for renewable energy policy in Scotland at this time. Scotland's key targets, and the strategies and policies which have been delivering them over the past few years, are outlined below.

The Climate Change (Scotland) Act 2009

The Climate Change (Scotland) Act 2009 initially established long term statutory targets for Scotland of reducing greenhouse gas emissions by at least 80% by 2050, with an interim target of reducing emissions by at least 42% by 2020. The Act also placed climate change duties on Scottish public bodies and included provisions on climate change including adaptation, forestry, energy efficiency and waste reduction.

Section 44 of the 2009 Act places climate change duties on Scottish public bodies. It states that a "public body must, in exercising its functions, act: in the way best calculated to contribute to the delivery of (Scotland's climate change) targets; in the way best calculated to help deliver any (Scottish adaptation programme); and in a way that it considers most sustainable". This means that all public sector organisations, including Scottish Ministers and local authorities, are obliged in exercising their functions to do so in a manner which is consistent with meeting the net zero climate change target.

Scottish Energy Strategy (2017)

The Scottish Energy Strategy (SES) was published in December 2017, in the context of lower greenhouse gas emissions targets set initially under the Climate Change (Scotland) Act 2009. The SES sets out the Scottish Government vision for the future energy system in Scotland for the period through to 2050. The SES identifies that Scotland's long-term climate change targets will require the near complete decarbonisation of our energy system by 2050, with renewable energy meeting a significant share of our needs.

The SES set a target for the equivalent of 50% of the energy for Scotland's heat, transport and electricity consumption to be supplied from renewable sources by 2030. This 50% target roughly equates to 17GW of installed capacity in 2030. In addition to setting energy targets, the SES also sets out six strategic priorities These include:

"System security and flexibility – we should have the capacity, the connections, the flexibility and resilience necessary to maintain secure and reliable supplies of energy to all of Scotland's homes and businesses as our energy transition takes place.

Renewable and low carbon solutions – we 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 needs – helping to achieve our ambitious emissions reduction targets."

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

The Scottish Energy Strategy Position Statement was published March 2021 which reaffirms the renewable energy targets set out in the 2017 SES.



The Climate Emergency Declaration

At the SNP Conference in April 2019, Scotland's First Minister declared a climate emergency: "*As First Minister of Scotland, I am declaring that there is a climate emergency. And Scotland will live up to our responsibility to tackle it.*"

In May 2019 the Scottish Government formally declared a climate emergency. In a speech to the Scottish Parliament, the Climate Change Secretary stated: "*There is a global emergency. The evidence is irrefutable. The science is clear. And people have been clear: they expect action.*"

The Climate Change (Emissions Reduction Targets) (Scotland) Act 2019

As detailed above, in May 2019 the Scottish Government formally declared a climate emergency. This resulted in the Climate Change (Emissions Reduction Targets) (Scotland) Act 2019, which amends the Climate Change (Scotland) Act 2009 and commits the Scottish Ministers to legally binding targets for net zero emissions.

It amends the Climate Change (Scotland) Act 2009 and commits the Scottish Ministers to a new target of net zero emissions of all greenhouse gases by 2045, with interim targets for reductions of at least 56% by 2020, 75% by 2030 and 90% by 2040. These amended greenhouse emissions targets, and the series of annual targets towards them, represent a substantial increase over the targets set in the previous Act.

To help ensure delivery of the long-term targets, the framework includes statutory annual targets for every year to net zero. Up to 2020 the annual percentage reduction required is 1%, but this immediately leaps for each year between 2020 to 2030. It increases to 1.9% for each year between 2020 and 2030, a near doubling of the response.

The importance of the planning system in achieving these climate change objectives was acknowledged at the time by the First Minister who stated:

"...the next National Planning Framework and review of Scottish Planning Policy will include considerable focus on how the planning system can support our climate change goals."

Climate Change Plan Update (2020)

The Scottish Government published its most recent Climate Change Plan in December 2020 'Update to the Climate Change Plan 2018 – 2032: Securing a Green Recovery on a Path to Net Zero'. The Climate Change Plan Update responds to the declared climate emergency and considers what policies and proposals are necessarily to deliver against the new targets set under the Climate Change (Emissions Reduction) (Scotland) Act 2019.

The Climate Change Plan Update states that it is essential that a recovery from the COVID-19 pandemic "*responds to the climate emergency and "continues the rapid growth in renewables over the past 20 years, moving from a low to a zero-carbon electricity system"*.

Looking specifically at seeking to achieve Scotland's emissions targets out to 2032, the Climate Change Plan Update states that there will need to be "*a substantial increase in renewable generation, particularly through new offshore and onshore wind capacity.*" It seeks to quantify this by identifying that it expects between 11 to 16 GW of new renewable capacity will need to be developed during this period.

A stronger and more resilient Scotland: Programme for Government 2022-23 (2022)

The Programme for Government is published every year at the beginning of September and sets out the actions that the Scottish Government will take in the coming year and beyond.

The Scottish Government's '*A stronger and more resilient Scotland*' was published in September 2022. This document reaffirms the Scottish Government's commitment to targets set out in prior programmes by confirming that these commitments "*remain in place and our ambition to deliver them is undiminished: the more so since we are clear that much of the answer to the current cost*



crisis and the poverty it will cause lies in our journey to net zero, investment in a strong economy, and in building a fairer society."

Page 11 notes that *"Scotland has the potential to become a global green energy powerhouse, for Europe and beyond. Scotland's vast potential for renewable energy generation opens up opportunities for exporting electricity and green hydrogen, and attracting energy intensive industries."*

Onshore Wind Policy Statement 2022

The Scottish Onshore Wind Policy Statement (OWPS) underwent consultation following the publication of the draft OWPS in November 2021. The final OWPS 2022 was published in December 2022.

The CCC looked at four exploratory scenarios for emissions to 2050 and concluded that, in every scenario, the UK will require a total of 25-30GW of installed onshore wind capacity by 2050 to meet government targets. This would mean a doubling of the current UK installed capacity.

As a result of these findings the OWPS 2022 sets a new ambition for the deployment of onshore wind in Scotland: a minimum installed capacity of 20GW of onshore wind in Scotland by 2030. This 20GW ambition will help support the rapid decarbonisation of the energy system and the sectors which depend upon it, aligning with a just transition to net zero.

Chapter 1 of the OWPS 2022 contains specific acknowledgement of the need for further the speedy deployment of onshore wind. It states *"We must now go further and faster than before. We expect the next decade to see a substantial increase in demand for electricity to support net zero delivery across all sectors, including heat, transport, and industrial processes"*. As a result of the policy ambition set out at 1.3.2 there is a need for a minimum installed capacity of 20GW by 2030. If that ambition is to be achieved, consents need to be granted to allow deployment as quickly as possible. Paragraph 2.4.2 states that *"Onshore wind will play a crucial role in delivering our legally binding climate change targets."*

Draft Energy Strategy and Just Transition Plan 2023

On 10 January 2023, the Scottish Government published the Draft version of its *'Energy Strategy and Just Transition Plan – delivering a fair and secure zero carbon energy system for Scotland'*. This plan outlines the key ambitions for Scotland's energy future, with an even greater focus on renewable energy. It is predicted that these policies would result in a net jobs gain across the energy production sector and will increase renewable energy exports whilst also reducing exposure to future global energy market fluctuations.

The Plan outlines several of the government's targets to reach a net zero Scotland, with the main milestones and dates outlined as:

- to substantially increase Scotland's renewable electricity generation capacity from the current level of 13.4 Gigawatts (GW) with an additional 20GW resulting in an overall capacity of at least 33.4GW by 2030;
- aims to have 8-11GW of installed offshore, and an additional 12GW of installed onshore wind capacity by 2030;
- for renewable and low-carbon hydrogen power to provide 5GW (the equivalent of 15% of Scotland's current energy needs) by 2030, increasing to 25GW by 2045; and
- to phase out the necessity for new petrol and diesel cars by 2032, and to reduce total car kilometres by 2030.

The plan also outlines general commitments made by the Government to assist with the transition to net zero, which include the following

- to establish a national public energy agency – 'Heat and Energy Efficiency Scotland';



- to increase the contributions of solar, hydropower and marine energy within Scotland’s energy mix;
- to accelerate the decarbonisation of domestic industry, transport and heat in buildings;
- to generate surplus electricity – allowing for the export of electricity and renewable hydrogen to support decarbonisation across Europe.;
- to create energy security – through the development of Scotland’s resources and additional energy storage;
- to allow for a just transition by maintaining or increasing employment in Scotland’s energy production sector against a decline in North Sea production; and
- to maximise the use of Scottish manufactured components in the energy transition, ensuring high-value technology and innovation.

Page 120 of the Draft Energy Strategy highlights the UK Government’s decision not to award the Scottish Cluster, led by the Acorn Project at St Fergus, track 1 status in their carbon capture, utilisation and storage (CCUS) cluster sequencing process. The Draft Energy Strategy goes on to state that this decision from the UK Government will have a negative effect on Scotland’s ability to meet emissions reduction targets. As a result of this, it is highlighted that Scotland “will require contingency planning to identify the additional emissions reduction effort that may be needed from other sectors to meet Scotland’s 2030 target.”.

Progress Towards Targets

Tables A-2, A-3 and **Graphs A-1** and **A-2** set out how Scotland has made progress towards the renewable energy and greenhouse gas targets set by the Scottish Government.

Table A-2: Progress Against Renewable Energy Targets

Year	Target	Achieved/Progress
2020	Equivalent of 100% of all electricity used in Scotland to come from renewable sources. ¹⁸	No – equivalent of 98.6% of all electricity used in Scotland came from renewable sources. ¹⁹
2021	Equivalent of 100% of all electricity used in Scotland to come from renewable sources. (continuation of 2020 target as target was not met)	No – equivalent of 85.2% of all electricity used in Scotland came from renewable sources.
2030	To increase the installed onshore wind capacity in Scotland to 20GW. ²⁰	Latest figures in September 2022 (most recently available) show that the installed onshore wind capacity in Scotland was 13.6GW. ²¹

¹⁸ Scottish Government (2011) *2020 Renewable Routemap for Renewable Energy in Scotland Update 2011*

¹⁹ Scottish Government *Energy Statistics for Scotland – Q4 2020*

<https://www.gov.scot/binaries/content/documents/govscot/publications/statistics/2018/10/quarterly-energy-statistics-bulletins/documents/energy-statistics-summary---march-2021/energy-statistics-summary---march-2021/govscot:document/Scotland+Energy+Statistics+Q4+2020.pdf>

²⁰ Scottish Government *Onshore Wind Policy Statement 2022*

<https://www.gov.scot/publications/onshore-wind-policy-statement-2022/documents>

²¹ Scottish Government *Energy Statistics for Scotland – Q3 2022*

<https://www.gov.scot/publications/energy-statistics-for-scotland-q3-2022/pages/renewable-electricity-capacity/>



Year	Target	Achieved/Progress
2030	To generate 50% of Scotland’s overall energy consumption from renewable sources.	Final figures for 2020 indicate that the equivalent of 26.7% of total Scottish energy consumption came from renewable sources; the highest level to date. It increased from 24.0% in 2019.
2050	To have decarbonised the energy system almost completely. ²²	Future target and difficult to gauge progress against.

Table A-3: Progress Against Greenhouse Gas Emissions Target

Year	Current Target ²³ (% Reduction of Emissions relative to 1990)	Achieved/Progress ²⁴ (% Reduction of Emissions relative to 1990)	Achieved/Progress ²⁵
2020	56% reduction	N/A	Achieved – GHG account reduced by 59% between the baseline period and 2020. As detailed in the Scottish Emissions Targets – First Five-Yearly Review (December 2022): “The fall in emissions in 2020 was largely due to the travel restrictions during the COVID-19 pandemic and it is unlikely the target would have been achieved without the impacts of the pandemic.”
2021	57.9%	51.1%	Not achieved – GHG account reduced by 49.9% between baseline period and 2021.
2022	59.8%	53.8%	Most recent data available is 2021 figure.
2023	61.7%	56.4%	Most recent data available is 2021 figure.
2024	63.6%	59.1%	Most recent data available is 2021 figure.
2025	65.5%	61.7%	Most recent data available is 2021 figure.
2026	67.4%	64.4%	Most recent data available is 2021 figure.
2027	69.3%	67%	Most recent data available is 2021 figure.
2028	71.2%	69.7%	Most recent data available is 2021 figure.
2029	73.1%	72.3%	Most recent data available is 2021 figure.
2030	75% reduction		Most recent data available is 2021 figure.
2040	90% reduction		Most recent data available is 2021 figure.
2045	100% reduction		Most recent data available is 2021 figure.

²² Scottish Government (2017). *The future of energy in Scotland: Scottish energy strategy* 20 December 2017

²³ Scottish Government (2019). *Climate Change (Emissions Reduction Targets) (Scotland) Act 2019*

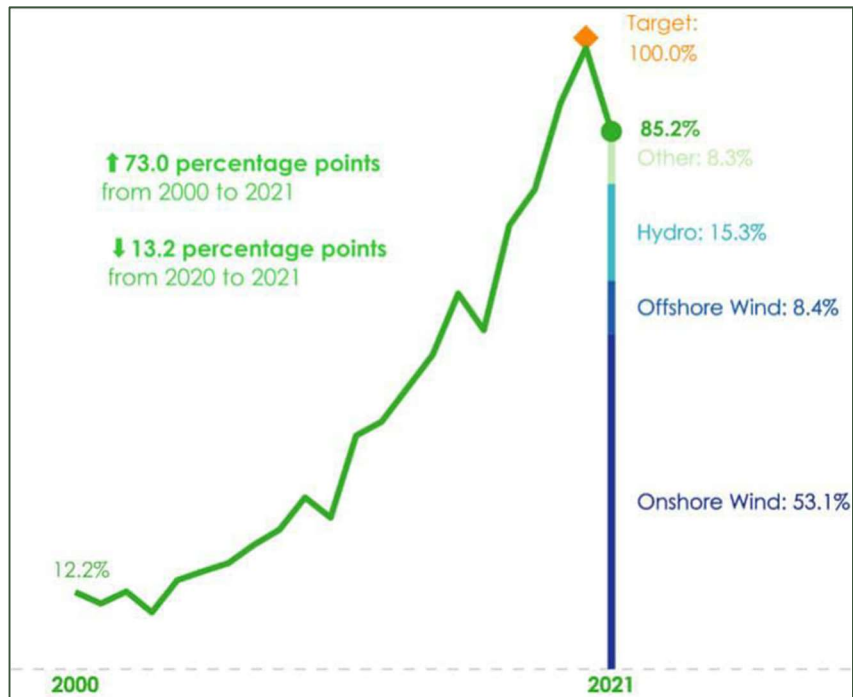
²⁴ Independent Climate Change Committee (2022). *Scottish Emissions Targets – First Five-Yearly Review*

²⁵ Scottish Government Scottish Greenhouse Gas Statistics 2021:

<https://www.gov.scot/binaries/content/documents/govscot/publications/statistics/2023/06/scottish-greenhouse-gas-statistics-2021/documents/scottish-greenhouse-gas-statistics-2021/scottish-greenhouse-gas-statistics-2021/govscot%3Adocument/scottish-greenhouse-gas-statistics-2021.pdf>

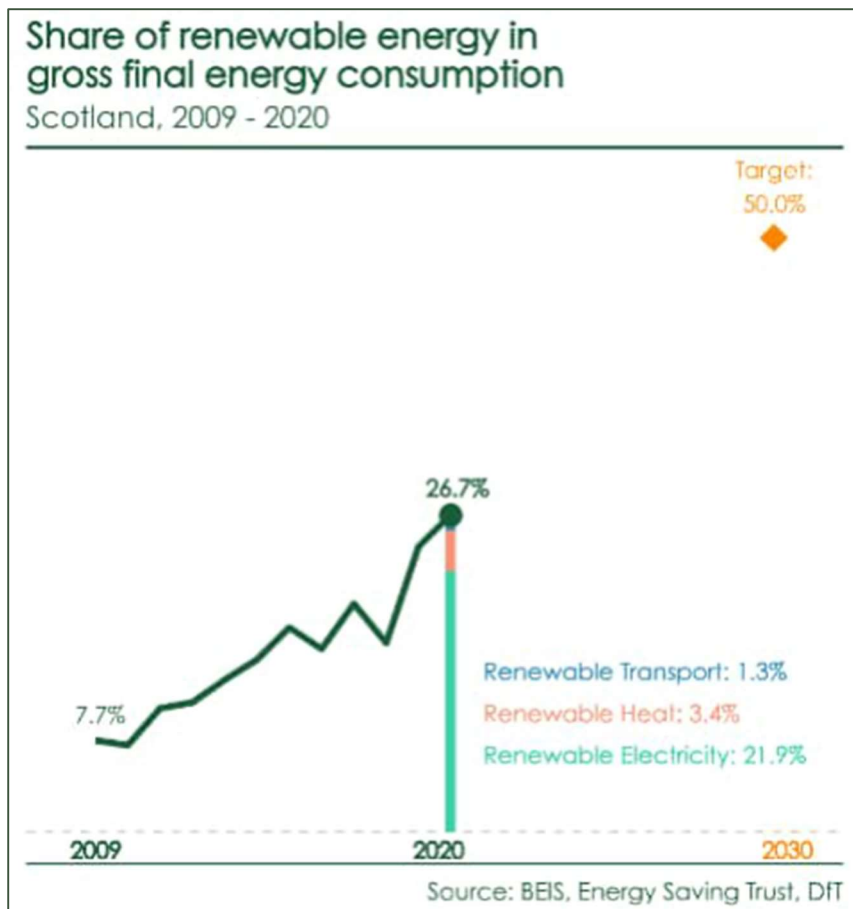


Graph A-1: Renewable Electricity Generation in Scotland



Source: Energy Statistics for Scotland Q3 2022

Graph A-2: Progress Against Renewable Energy Targets



A.1.4 Conclusion

From the various legislation, targets, policies, strategies and statements detailed in this appendix, it is clear that from international level, through UK level and at the Scottish specific level, there is strong governmental (and from non-governmental organisations) support for the urgent need of additional renewable energy generation capacity.

The IPCC has repeatedly flagged the challenge that the world faces in addressing climate change and the stark reality of needing to reach net-zero, with real and significant progress by 2030. Scotland has long considered itself at the forefront when it comes to robust targets for reducing greenhouse gas emissions and fighting climate change. However, as detailed, Scotland did not meet its 2020 target for 100% of all electricity used in Scotland to come from renewable sources (it also did not meet this target in 2021). Scotland did meet its 2020 target of a 56% reduction of greenhouse gas emissions relative to 1990, however this was largely due to the impact of the COVID-19 pandemic, and evidence shows emissions rebounded in 2021. Scotland therefore did not meet either the current or recommended 2021 target for emissions reductions.

Separate to considerations relating to climate change and greenhouse gas emissions, the ongoing war in Ukraine continues to provide a further impetus for domestically sourced energy supply, both from a security and financial perspective.

Therefore, it is concluded that the seriousness of the current climate emergency (as repeatedly stressed by the IPCC), the urgency of the renewable energy and climate change targets set by the Scottish Government (at international level and by the UK Government) and the associated vital role that renewable energy developments such as the proposed development can play in meeting these targets, should be afforded substantial weight in the planning balance during determination of this application.





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