DAVID BELL PLANNING
CHARTERED TOWN PLANNERS

Hill of Fare Wind Farm
Section 36 Application:

Planning & Sustainable Place Statement

October 2023

power for good

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Contents

1. Introduction

1.1 Background

1.1.1 This Planning & Sustainable Place Statement has been prepared by David Bell Planning Ltd (DBP) on behalf of Renewable Energy Systems Ltd (the Applicant) in relation to the proposed Hill of Fare Wind Farm ('the Proposed Development') located in within the Aberdeenshire Council ('the Council') administrative area.

1.1.2 As the Proposed Development has a generating capacity in excess of 50 megawatts (MW), consent is required from Scottish Ministers under Section 36 of the Electricity Act 1989 ('the 1989 Act'). In addition, a request is being made by the Applicant that planning permission is deemed to be granted under Section 57(2) of the Town and Country Planning (Scotland) Act 1997, as amended ('the 1997 Act').

1.1.3 The application for consent is accompanied by an Environmental Impact Assessment Report (EIAR) which presents the findings of an EIA undertaken in accordance with the Electricity Works (Environmental Impact Assessment) (Scotland) Regulations 2017 ('the EIA Regulations'). The EIAR presents information on the identification and assessment of the likely significant environmental effects of the Proposed Development.

1.1.4 This Planning and Sustainable Place Statement makes various cross references to information contained in the EIAR and presents an assessment of the Proposed Development against relevant policy with due regard given to the provisions of the statutory Development Plan, now made up of National Planning Framework 4 and the Local Development Plan for the Aberdeenshire area, and other relevant material considerations.

1.1.5 This Planning & Sustainable Place Statement considers the potential benefits and the effects which may arise and concludes as to the overall acceptability of the Proposed Development in relation to the planning policy framework and relevant material considerations.

1.2 The Applicant

1.2.1 RES is the world's largest independent renewable energy company active in onshore and offshore wind, solar, energy storage, green hydrogen, transmission and distribution. At the forefront of the industry for over 40 years, RES has delivered more than 23 GW of renewable energy projects across the globe and supports an operational asset portfolio of 12 GW worldwide for a large client base. RES employs more than 2,500 people and is active in 14 countries.

1.2.2 From its Glasgow office RES has been developing, constructing and operating wind farms in Scotland since 1993. RES has developed and/or built twenty-one wind farms in Scotland with a total generation capacity of 597 MW. The Applicant has the necessary knowledge and experience in renewable energy to develop the Proposed Development.

1.3 Site Location and Description

1.3.1 The application site is located north of the A980, approximately 6 km[1] north of the settlement of Banchory.

1.3.2 The site covers an area of approximately 1,380 hectares (ha) and comprises predominantly moorland land cover, with small areas of commercial forestry.

[1] This distance is given to the approximate centre point of the site.

1.4 The Proposed Development

1.4.1 The Proposed Development is described in detail in Chapter 2 (Proposed Development) of the EIAR. In summary, it will comprise:

- 16 three-bladed horizontal axis wind turbines comprising:
  - 5 up to 200 m tip height
  - 11 up to 180 m tip height.

  The specific turbine model will be procured post-consent in two sizes; 180 m and 200 m blade tip height above ground level. The turbines would have a rotor diameter of approximately 155 m with, nominally, 6.6 megawatts (MW) generating capacity, providing an approximate installed capacity of 105.6 MW;
- associated low to medium voltage transformers and related switchgear at each turbine;
- turbine foundations;
- hardstand areas for erection cranes at each turbine location;
- a network of access tracks including watercourse crossings, passing places, turning heads and site entrance from the public road network;
- borrow pits (dependent on availability of stone within the site);
- a substation compound containing electrical infrastructure, control building, welfare facilities and a communications mast;
- a Battery Energy Storage System (BESS), rated at approximately 100 MW and associated compound;
- a network of buried electrical and communication cables;
- felling and replanting of forestry;
- temporary construction compounds;
- signage; and
- habitat management and biodiversity enhancement measures.

1.4.2 Battery storage is increasingly playing an important part in the UK energy network, through the provision of grid stabilisation services. When connected to a wind farm such as the Proposed Development, they will allow the wind turbines to generate electricity in periods of high wind, but low demand (when wind farms may otherwise be constrained off the system) and provide electricity when this scenario reverses (i.e. lower wind speeds but higher electricity demand). Battery storage technologies are rapidly advancing and are seen as an important and necessary component in the wider energy network in order to attain net zero targets. This is further referenced below with regard to the renewable energy policy framework.

1.4.3 A micro-siting allowance of up to 100 m in all directions is being sought in respect of each turbine and the supporting ancillary infrastructure in order to address any potential difficulties which may arise in the event that pre-construction surveys identify unsuitable ground conditions or unforeseen environmental constraints that could be avoided by relocation.

1.4.4 The Proposed Development will be accessed directly from the B977 via an upgraded site entrance to the east of the site.

1.4.5 The Proposed Development would most likely be connected at Fetteresso Substation, approximately 32 km southeast of the site.

1.4.6 Construction of the Proposed Development is estimated to last 18-24 months.

1.4.7 The Proposed Development is expected to operate for up to 50 years following which decommissioning of the wind turbines and other infrastructure would be undertaken or an application may be submitted to repower the site.

1.5 The Statutory Framework

1.5.1 An application under section 36 of the 1989 Act for consent for the construction of an electricity generating station whose capacity exceeds 50 MW is significantly different from an application for planning permission for a similar station whose capacity is less than 50 MW.

1.5.2 Section 25 of the 1997 Act does not apply to the determination of applications under section 36 of the 1989 Act as confirmed in the case of *William Grant & Sons Distillers Ltd v Scottish Ministers* [2012] CSOH 98 (paragraphs 17 and 18).

1.5.3 In addition, there are potentially certain environmental duties in relation to preservation of amenity and fisheries provisions in Schedule 9, paragraph 3 that are likely to apply.

1.5.4 The Applicant does not hold a generation licence or exemption under the 1989 Act and therefore the statutory duties set out in paragraph 3 of Schedule 9 to the 1989 Act do not currently apply to the Applicant when formulating proposals for consent under section 36 of the 1989 Act. The Applicant has however, through the EIA process, had full regard to the matters set out in paragraph 3(1)(a) of Schedule 9.

1.5.5 The EIAR identifies how various factors were taken into account in the formulation of the application. In addition, each EIA Chapter includes assessment of the likely significant effects and also, where appropriate, the identification of appropriate mitigation. This includes both embedded mitigation which is integral to the design and also additional specific measures which have been identified. The approach to design and mitigation has been explained in Chapter 3 of the EIAR “Design Evolution and Alternatives”.

1.5.6 The Scottish Ministers are obliged 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. The duty on the Ministers is to have regard to the matters specified in Schedule 9. Schedule 9 is not a development management test.

1.5.7 In considering the overall statutory and regulatory framework within which the Proposed Development should be assessed, the statutory Development Plan is a material consideration which should be taken into account in the round with all other relevant material considerations. It is important to note, however, that section 25 of the 1997 Act is not engaged as there is no ‘primacy’ of the Development Plan in an application made under the 1989 Act.

1.6 Scope & Structure of Planning & Sustainable Place Statement

1.6.1 The planning policy framework changed significantly in early 2023 when National Planning Framework 4 (NPF4) came into force and with the publication of the new Onshore Wind Policy Statement (OWPS).

1.6.2 This Planning & Sustainable Place Statement addresses these new policy documents and provides an assessment of the Proposed Development against relevant new policy provisions and the statutory Development Plan. The appraisal highlights policy differences with the former national planning policy and where there are incompatibilities between new national planning policies and those of the LDP.

1.6.3 This Statement is structured as follows:

- **Chapter 2** sets out the up-to-date position with regard to the renewable energy policy and emissions reduction legislative framework and includes reference to the new Onshore Wind Policy Statement and the Scottish Government's Draft Energy Strategy and Just Transition Plan;
- **Chapter 3** describes the benefits of the Proposed Development;
- **Chapter 4** appraises the Proposed Development against the most up to date element of the Development Plan, namely the relevant provisions of NPF4;
- **Chapter 5** appraises the Proposed Development against the relevant provisions of the Local Development Plan and related guidance; and
- **Chapter 6** examines the planning balance and presents overall conclusions.

2. The Renewable Energy Policy & Legislative Framework

2.1 Introduction

2.1.1 This Chapter refers to the renewable energy policy and emissions reduction legislative framework with reference to relevant international, UK and Scottish provisions. The framework of international agreements and obligations, legally binding targets and climate change global advisory reports is the foundation upon which national energy policy and greenhouse gas emissions (GHG) reduction law is based. This underpins what can be termed the need case for renewable energy from which the Proposed Development can draw a high level of support.

2.1.2 The Proposed Development requires to be considered against a background of material UK and Scottish Government energy and climate policy and legislative provisions, as well as national planning policy and advice. These taken together provide very strong support for onshore wind in principle.

2.1.3 It is evident that there is clear and consistent policy support at all levels, from international to local, for the deployment of renewable energy generally, and for onshore wind specifically, to combat the global climate crisis, diversify the mix of energy sources, achieve greater security of supply, and to attain legally binding emissions reduction targets.

2.1.4 The Proposed Development would make a valuable contribution to help Scotland meet its renewable energy and electricity production targets, while supporting emissions reduction to combat climate change in the current Climate Emergency.

2.1.5 UK and Scottish Government renewable energy policy and associated renewable energy and electricity targets are important considerations. It is important to be clear on the current position as it is a fast-moving topic of public policy. The context of international climate change commitments is set out. This is followed by reference to key UK level statutory and policy provisions and then a detailed description of relevant Scottish Government statutory and policy provisions is set out.

2.2 International Commitments

The Paris Agreement (2016)

2.2.1 In December 2015, 196 countries adopted the first ever universal, legally binding global climate deal at the Paris Climate Conference (COP21). The Paris Agreement within the United Nations Framework Convention on Climate Change sets out a global action plan towards climate neutrality with the aims of stopping the increase in global average temperature to well below 2^0C above pre-industrial levels and to pursue efforts to limit global warming to 1.5^0C.

2.2.2 It is clear that moving to a low carbon economy is a globally shared goal and will require absolute emission reduction targets. The UK Government's commitment under the Paris Agreement links to the Climate Change Committee's (CCC) advice to both the UK and Scottish Governments on 'net zero' targets which have now, at both the UK and Scottish levels, been translated into new legislative provisions and targets for both 2045 (Scotland) and 2050 (UK). This is referred to below.

2.2.3 The Paris Agreement does not itself represent Government policy in the UK or Scotland. However, the purpose of domestic and renewable energy and GHG reduction targets is to meet the UK's commitment in the Paris Agreement.

United Nations - Intergovernmental Panel on Climate Change

2.2.4 The Intergovernmental Panel on Climate Change (IPCC) is the United Nations Body for assessing the science related to climate change.

2.2.5 The IPCC prepares comprehensive assessment reports about the state of scientific, technical and socio-economic knowledge on climate change, its impacts and future risks and options for reducing the rate at which climate change is taking place. IPCC reports are commissioned by the worlds' Governments and are an agreed basis for COP[2] negotiations.

2.2.6 The IPCC's Special Report on Warming of 1.5°C, published in 2018, was a key piece of evidence for the CCC's recommendation to the UK Government for a 2050 net zero greenhouse gas emission target. The IPCC's reports since 2018 have provided an up-to-date estimate of how close global temperatures are to 1.5°C of warming above pre-industrial levels and the remaining volume of global cumulative carbon dioxide that could be emitted to be consistent with keeping global warming below any particular threshold (such as the 1.5°C and 2°C levels referred to in the Paris Agreement).

2.2.7 The IPCC's 6th Assessment Report was published in March 2023. The Summary for Policymakers Report (page 10) states that it is likely that warming will exceed 1.5°C during the 21st Century and make it harder to limit warming 2°C. It states (page 12):

"*Continued greenhouse gas emissions will lead to increasing global warming, with the best estimate of reaching 1.5°C in the near term in considered scenarios and modelled pathways. Every increment of global warming will intensify multiple and concurrent hazards (high confidence). Deep, rapid and sustained reductions in greenhouse gas emissions would lead to a discernible slowdown in global warming within around two decades, and also to discernible changes in atmospheric composition within a few years (high confidence)*".

2.2.8 Page 24 of the report states "*There is a rapidly closing window of opportunity to secure a liveable and sustainable future for all (very high confidence)*".

United Nations Statement, July 2023

2.2.9 The UN issued a statement on 27 July 2023 with regard to increasing global temperatures. The UN Secretary General Antonio Guterres stated that it was "*virtually certain that July 2023 will be the warmest on record*".

2.2.10 The Secretary General stated "*Climate change is here. It is terrifying. And it is just the beginning. The era of global warming has ended, and the era of global boiling has arrived*."

2.2.11 The statement refers to climate conditions in the month of July 2023 as being remarkable and unprecedented, and that there is virtual certainty that the month of July as a whole will become the warmest July on record and the warmest month on record. In addition, the statement sets out that ocean temperatures are at their highest ever level recorded for this time of year [July].

2.2.12 The statement also refers to the net zero goal and the Secretary General stated "*The need for new national emissions targets from G20 members and urged all countries to push to reach net zero emissions by mid-century*."

[2] United Nations Framework Convention on Climate Change, Conference of the Parties (COP).

2.3 UK Climate Change & Energy Legislation & Policy

The Climate Emergency

2.3.1 A critical part of the response to the challenge of climate change was the Climate Emergency which was declared by the Scottish Government in April 2019 and by the UK Parliament in May 2019. The declaration of Climate Emergency needs to be viewed in the context in which it was declared (advice from the CCC) and in response to commitments under the Paris Agreement and what followed from it as a result of the declaration (new emissions reduction law).

The Climate Change Act 2008 & Carbon Budgets

2.3.2 The Climate Change Act 2008 (the 2008 Act) provides a system of carbon budgeting. Under the 2008 Act, the UK committed to a net reduction in GHG emissions by 2050 of 80% against the 1990 baseline. In June 2019, secondary legislation was passed that extended that target to at least 100% against the 1990 baseline by 2050, with Scotland committing to net zero by 2045.

2.3.3 The 2008 Act also established the CCC which advises the UK Government on emissions targets, and reports to Parliament on progress made in reducing GHG emissions.

2.3.4 The CCC has produced six four yearly carbon budgets, covering 2008 – 2037. These carbon budgets represent a progressive limitation on the total quantity of GHG emissions to be emitted over the five-year period as summarised in **Table 2.1** below. Essentially, they are five yearly caps on emissions.

2.3.5 These legally binding 'carbon budgets' act as stepping-stones toward the 2050 target. The CCC advises on the appropriate level of each carbon budget and once accepted by Government, the respective budgets are legislated by Parliament. All six carbon budgets have been put into law and run up to 2037.

Table 2.1: Carbon Budgets and Progress[3]

Budget	Carbon budget level	Reduction below 1990 levels	Met?
1st carbon budget (2008 – 2012)	3,018 $MtCO_2e$	25%	Yes
2nd carbon budget (2013 – 2017)	2,782 $MtCO_2e$	31%	Yes
3rd carbon budget (2018 – 2022)	2,544 $MtCO_2e$	37% by 2020	Yes
4th carbon budget (2023 – 2027)	1,950 $MtCO_2e$	51% by 2025	Off Track
5th carbon budget (2028 – 2032)	1,725 $MtCO_2e$	57% by 2030	Off Track
6th carbon budget (2033 – 2037)	965 $MtCO_2e$	78% by 2035	Off Track
Net Zero Target	100%	By 2050	

2.3.6 The Sixth Carbon Budget (CB6) requires a reduction in UK greenhouse gas emissions of 78% by 2035 relative to 1990 levels. This is seen as a world leading commitment, placing the UK "*decisively on the path to net zero by 2050 at the latest, with a trajectory that is consistent with the Paris Agreement*" (CB6, page 13).

[3] Source: CCC (2022).

2.3.7 Page 23 of CB6 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. Key points from CB6 include:

> UK climate targets cannot be met without strong policy action in Scotland.

> The CCC is clear in setting out that new demand for electricity will mean that electricity demand will rise 50% to 2035 and doubling or even trebling by 2050.

> CB6 needs to be met and that will need more and faster deployment of renewable energy developments than has happened in the past.

> The related 'Methodology Report' from the CCC advice, states that in all scenarios for the carbon budget and looking ahead to 2050, the CCC sees new onshore wind generation being deployed by 2050. They set out that their modelling reflects this by almost doubling onshore wind capacity to 20-30 GW in all scenarios by 2050.

2.3.8 Following the Sixth Carbon Budget, the UK Government announced on 20 April 2021 that it would set the world's most ambitious climate change target into law (by the Carbon Budget Order 2021 (the Order)[4]) to reduce emissions by 78% by 2035 compared to 1990 levels. This effectively brings forward the UK's previous commitment of an 80% reduction by 2050 by 15 years.

The UK Energy White Paper (December 2020)

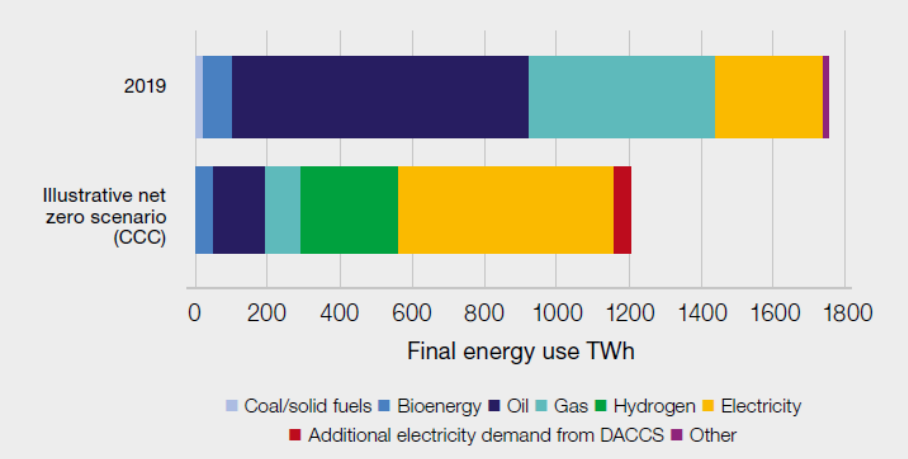
2.3.9 The Energy White Paper 'Powering our Net Zero Future' was published on 14 December 2020, represents a sea change in UK policy, and highlights the importance of renewable electricity.

2.3.10 It sets out that "*electricity is a key enabler for the transition away from fossil fuels and decarbonising the economy cost-effectively by 2050". A key objective is to "accelerate the deployment of clean electricity generation through the 2020s*" (page 38).

2.3.11 Electricity demand is forecast to double out to 2050, which will "*require a four-fold increase in clean electricity generation with the decarbonisation of electricity increasingly underpinning the delivery of our net zero target*" (page 42).

2.3.12 This anticipated growth of renewable electricity is illustrated in the graph below – **Figure 2.1**.

Figure 2.1: Illustrative UK Final Energy Use in 2050[5]



[4] The Order sets the carbon budget for the 2033-2037 budgetary period at 965 million tonnes of carbon dioxide equivalent. The net UK carbon account is defined in section 27 of the Climate Change Act 2008.

[5] Source: Energy White Paper page 9 (2020).

2.3.13 Whilst offshore renewables are expected to grow significantly, the White Paper also sets out that "*onshore wind and solar will be key building blocks of the future generation mix, along with offshore wind. We will need sustained growth in the capacity of these sectors in the next decade to ensure that we are on a pathway that allows us to meet net zero emissions in all demand scenarios*" (page 45).

The UK Net Zero Strategy (October 2021)

2.3.14 The UK Government published the Net Zero Strategy in October 2021. This set out policies and proposals for keeping the UK on track in relation to carbon budgets and the UK's nationally determined contribution (NDC)[6] and establishes the long-term pathway to net zero by 2050.

2.3.15 The Net Zero Strategy sets out the Government's plans for reducing emissions from each sector of the UK economy, related to carbon budget and to the eventual target of net zero by 2050. The Strategy has been submitted to the United Nations Framework Convention on Climate (UNFCC) as the UK's second long-term low greenhouse gas emission development strategy under the Paris Agreement.

2.3.16 Page 19 addresses the power sector and sets out that the power system will be fully decarbonised by 2035.

2.3.17 Key policies are set out including that by 2030 there will be some 40GW of offshore wind with "*more onshore, solar and other renewables*". The strategy also builds on the UK Government's 'Ten Point Plan' "*with our vision to create new jobs in net zero Industries as we meet our climate target*." (page 40).

2.3.18 It is notable that in terms of power, the Strategy references the Energy White Paper (2020) which set out the goal of a fully decarbonised and low-cost power system by 2050. It adds that CB6 represents "*a very significant increase in the pace of power sector decarbonisation, coupled with increased demand due to the accelerated action in other sectors dependent on low-carbon electricity*". (page 98). It adds:

"*although the Energy White Paper envisaged achieving an overwhelmingly decarbonised power system during the 2030s, we have since increased our ambition further. By 2035 all our electricity will need to come from low carbon sources, subject to security of supply, bringing forward the Government's commitment to a fully decarbonised power system by 15 years, whilst meeting a 40-60% increase in demand*".

2.3.19 The Strategy also sets out that the Government will be supporting sustained deployment of low-carbon generation (page 103) and will continue drive a rapid deployment of renewables.

The British Energy Security Strategy (April 2022)

2.3.20 The British Energy Security Strategy ("the Strategy") was published by the UK Government on 07 April 2022. The Strategy focuses on energy supply and states that in the future nuclear will have an expanded role and that renewables have an important role: the foreword states *inter alia*:

"*this government will reverse decades of myopia, and make the big call to lead again in a technology the UK was the first to pioneer, by investing massively in nuclear power….*

Accelerating the transition away from oil and gas then depends critically on how quickly we can roll out new renewables….

[6] Every country that signed up to the Paris Agreement (2015) set out a target known as a nationally determined contribution for reducing greenhouse gas emissions by around 2030. For the UK the target was a 68% reduction on 1990 levels by 2030.

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."

2.3.21 Reducing Scotland's and the wider UK's dependency on hydrocarbons has important security of supply, electricity cost and fuel poverty avoidance benefits. Those actions already urgently required in the fight against climate change are now required more urgently for global political stability and insulation against dependencies on rogue nation states.

Powering up Britain

2.3.22 On 30 March 2023 the UK Government (Department for Energy Security and Net Zero) published 'Power Up Britain' which comprises a series of documents including an Energy Security Plan, Carbon Budget Delivery Plan (CBDP) and Net Zero Growth Plan.

2.3.23 The CBDP is the means by which the UK Government satisfies Section 14 of the Climate Change Act 2008 to publish proposals and policies for enabling Carbon Budgets 4, 5 and 6 to be met. The CBDP was published in response to the High Court ruling[7] that the Government's 2021 Net Zero Strategy did not comply with the Climate Change Act. The Government has therefore had to provide a firmer public commitment to its plans, which has resulted in some changes in approach and ambition.

2.3.24 The Energy Security Plan sets out the steps that the UK Government is taking to ensure that the UK is more energy independent, secure and resilient. It builds upon the British Energy Security Strategy and the Net Zero Strategy. The report sets out that the Government is aiming for a doubling of Britain's electricity generation capacity by the late 2030s in line with the aim to fully decarbonise the power sector by 2035, subject to security of supply.

2.3.25 The introduction of the Net Zero Growth Plan states:

"*Energy Security and net zero are two sides of the same coin. The energy transition and net zero are among the greatest opportunities facing this country and we are committed to ensuring that the UK takes advantage of its early mover status. Global action to mitigate climate change is essential to long term prosperity…".*

CCC – Report to Parliament 2023

2.3.26 The CCC published its report to Parliament 'Progress in Reducing Emissions' in June 2023. It sets out (page 13) that despite the UK Government having issued the CBDP, "*policy development continues to be too slow and our assessment of the CBDP has raised new concerns. Despite new detail from Government, our confidence in the UK meeting its medium-term targets has decreased in the past year*".

2.3.27 The CCC adds that:

"*At COP26, the UK made stretching 2030 commitments in its Nationally Determined Contribution (NDC) – now only 7 years away. To achieve the NDC goal of at least a 68% fall in territorial emissions from 1990 levels, the rate of emissions reduction outside the power sector must almost quadruple. Continued delays in policy development and implementation mean that the NDCs achievement is increasingly challenging*".

2.3.28 Key messages include (pages 14 and 15):

[7] The High Court ruled in July 2022 (*R (Friends of the Earth & Others) v Secretary of State for Business, Energy and Industrial Strategy* [2022] EWHC 1841) that the UK Government's Net Zero Strategy unlawful as it did not meet its obligations under the Climate Change Act 2008 to clearly evaluate how the Government intended to achieve its Carbon Budgets.

- A lack of urgency – the CCC note that the net zero target was legislated in 2019 but there remains a lack of urgency over its delivery. It states, "*the net zero transition is scheduled to take around three decades, but to do so requires a sustained high intensity of action. This is required all the more, due to the slow start to policy development so far. Pace should be prioritised over perfection*".
- Planning policy needs radical reform to support net zero – the CCC state that in this regard that: "*In a range of areas, there is now a danger that the rapid deployment of infrastructure required by the Net Zero transition is stymied or delayed by restrictive planning rules. The planning system must have an overarching requirement that all planning decisions must be taken given full regard to the imperative of Net Zero*".

2.4 Climate Change & Renewable Energy Policy: Scotland

The Climate Emergency

2.4.1 The former Scottish First Minister Nicola Sturgeon declared a "Climate Emergency" in her speech to the SNP Conference in April 2019. Furthermore, Climate Change Secretary Roseanna Cunningham made a statement on 14 May 2019 to the Scottish Parliament on the 'Global Climate Emergency' and stated:

"*There is a global climate emergency. The evidence is irrefutable. The science is clear and people have been clear: they expect action. The Intergovernmental Panel on Climate Change issued a stark warning last year the world must act now or by 2030 it will be too late to limit warming to 1.5 degrees.*

We acted immediately with amendments to our Climate Change Bill to set a 2045 target for net zero emissions - as we said we'd do. If agreed by Parliament, these will be the most stringent legislative targets anywhere in the world and Scotland's contribution to climate change will end, definitively, within a generation. The CCC was clear that this will be enormously challenging...."

2.4.2 The key issue in relation to these statements is that they acknowledge the very pressing need to achieve radical change and that by 2030 it will be too late to limit warming to 1.5 degrees. The Scottish Government therefore acted on the climate emergency in 2019 by bringing in legislation.

2.4.3 Furthermore, the declaration of the climate emergency is not simply a political declaration, it is now the key priority of the Scottish Government at all levels. Indeed, defining the issue as an emergency is a reflection of both the seriousness of climate change and its potential effects and the need for urgent action to cut carbon dioxide and other GHG emissions.

2.4.4 The scale of the challenge presented by the new targets for net zero within the timescale adopted by the Scottish Government on the advice of the CCC is considerable, especially given the requirements for decarbonisation of heat and transport – this will require very substantial increases in renewable electricity generation by 2030.

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

2.4.5 Against this severe backdrop, the Scottish Government has set legal obligations to decarbonise and reduce emissions. Most notably, the Scottish Government has a statutory target to achieve "net zero" by 2045, with interim targets of 75% by 2030 and 90% by 2040, further supported by annual targets. It is clear that to have any hope of achieving the net zero target, much needs to happen by 2030.

2.4.6 When it was enacted, the Climate Change (Scotland) Act 2009 set world leading greenhouse gas emissions reduction targets, including a target to reduce emissions by 80% by 2050. However, the Climate Change (Emissions Reduction Targets) (Scotland) Act 2019 amended the 2009 Act and has set the even more ambitious targets.

2.4.7 The 75% target required to be met by 2030 is especially challenging. It was the Scottish Parliament that increased the requirement from a 70 to 75% reduction by 2030. This acts upon the declaration of the climate emergency and recognises the urgent response that is required.

2.4.8 The Scottish Government publishes an annual report that sets out whether each annual emissions reduction target has been met. **Table 2.2** below sets out the annual targets for every year to net zero. The report for the 2019 target year was published in June 2021. The report states that the 'GHG Account' reduced by only 51.5% between the baseline period and 2019. As noted, the 2019 Act specifies a 55% reduction over the same period – therefore the targets for 2018 and 2019 were not met.

2.4.9 The Scottish GHG Statistics for 2020 were released in June 2022. These show that the GHG account reduced by some 58.7% between the baseline period and 2020. However according to the report[8], the drop in emissions between 2019 and 2020 was mainly down to lower emissions from domestic transport, international flights and shipping and energy supply. All other sectors demonstrated modest reductions over this period, except the housing sector.

2.4.10 Coronavirus restrictions were responsible for the large drop in emissions from transport, while residential emissions increased by 0.1 MtCO2e as more people worked from home during the pandemic. The Scottish Cabinet Secretary for Net Zero, Energy and Transport Michael Matheson made a Statement[9] to the Scottish Parliament on 07 June 2022 on the release of the latest statistics. In the Statement he commented as follows:

"*Nonetheless, the most significant changes are in the transport sector and are associated with the temporary measures taken in response to the Covid-19 pandemic. We must be prepared for these figures to substantially rebound in 2021. There can be no satisfaction taken in emissions reductions resulting from the health, economic and social harms of the pandemic*." (emphasis added)

2.4.11 The Scottish GHG Statistics for 2021 were released in June 2023[10]. The 2009 Act (as amended) required that GHG emissions reduce by 51.1% between the baseline period and 2021[11]. GHG emission reduced by 49.9% therefore the interim target for 2021 was not achieved.

[8] Scottish Government. Official Statistics, Scottish Greenhouse Gas Statistics 2020, (June 2022).

[9] Ministerial Statement to Scottish Parliament by Cabinet Secretary for Net Zero, Energy and Transport on 07 June 2022, 'Greenhouse gas emission statistics 2020'.

[10] Scottish Government. Official Statistics, Scottish Greenhouse Gas Statistics 2021, (June 2023). The publication explains that the target figures have been revised since 2022 to incorporate methodological improvements and new data.

[11] Note this is a revised target in line with the Climate Change (Scotland) Act 2009 (Interim target) Amendment Regulations 2023. These Regulations adjust the annual target figures for 2021 to 2029. The reason for the change is based on advice from the CCC regarding international carbon reporting practice.

Table 2.2: Scotland's Annual Emission Reduction Targets to Net Zero

Year	Original % Reduction Target	New Targets (2023)	% Actual Emissions Reduction	Year	Original % Reduction Target
2018	54	-	50	2032	78
2019	55	-	51.5	2033	79.5
2020	**56**	**48.5**	**58.7**	2034	81
2021	57.9	51.1	49.9	2035	82.5
2022	59.8	53.8	-	2036	84
2023	61.7	56.4	-	2037	85.5
2024	63.6	59.1	-	2038	87
2025	65.5	61.7	-	2039	88.5
2026	67.4	64.4	-	**2040**	**90 (Interim)**
2027	69.3	67.0	-	2041	92
2028	71.2	69.7	-	2042	94
2029	73.1	72.3	-	2043	96
2030	**75**	**75**	**Interim Target**	2044	98
2031	*76.5*		-	***2045***	***100% Net Zero***

2.4.12 The targets set out in the above Table clearly illustrate the speed and scale of change that is required, essentially prior to 2030. This also demonstrates that up to 2020 the annual percentage reduction that was required was 1% but this then increases each year from 2020 to 2030. This is the level of change that is required to achieve the 2030 target.

2.4.13 This means the trajectory, in terms of the scale and pace of action to reduce carbon dioxide emissions, is steeper than before and the 2020s is a critical decade.

2.4.14 It is no exaggeration to say that there is a 'mountain to climb' to meet Scotland's 75% target for 2030. The CCC modelled five scenarios in CB6 and in none – even its most optimistic – is Scotland close to achieving a 75% emissions reduction by 2030: "*Scotland's 75% target for 2030 will be extremely challenging to meet, even if Scotland gets on track for net zero by 2045, Our balance net zero pathway for the UK would not meet Scotland's 2030 target – reaching a 64% reduction by 2030 – while our most stretching tail winds scenario reaches a 69% reduction*" (CB6, page 229).

The Scottish Energy Strategy (2017)

2.4.15 The Scottish Energy Strategy (SES) was published in December 2017. The SES preceded the important events and publications referred to above but nevertheless sets out that onshore wind is recognised as a key contributor to the delivery of renewable energy targets – specifically 50% energy from renewable sources to be attained by 2030. The SES did not and could not take account of what may be required in terms of additional renewable generation capacity to attain the new legally binding 'net zero' targets so it is out of date in that respect.

2.4.16 The SES refers to "*Renewable and Low Carbon Solutions*" as a strategic priority (page 41) and states "*we will continue to champion and explore the potential of Scotland's huge renewable energy resource, its ability to meet our local and national heat, transport and electricity needs – helping to achieve our ambitious emissions reduction targets*".

2.4.17 The SES sets out what is termed the "opportunity" for onshore wind and there is explicit recognition that onshore wind is amongst the lowest cost forms of power generation. It is also recognised as "*a vital component of the huge industrial opportunity that renewables creates for Scotland*".

2.4.18 The SES sets out the Government's clear position on onshore wind namely:

"*our energy and climate change goals mean that onshore wind must continue to play a vital role in Scotland's future – helping to decarbonise our electricity, heat and transport systems, boosting our economy, and meeting local and national demand."*

2.5 The Onshore Wind Policy Statement (2022)

2.5.1 The Scottish Government published an updated Onshore Wind Policy Statement (OWPS) on 21 December 2022. It replaces the version published in November 2017.

2.5.2 The Ministerial Foreword makes it explicitly clear that seeking greater security of supply and lower cost electricity generation are now key drivers alongside the need to deal with the climate emergency. In this regard, the Cabinet Secretary for Net Zero, Energy and Transport states (page 3):

"*that is why we must accelerate our transition towards a net zero society. Scotland already has some of the most ambitious targets in the world to meet net zero but we must go further and faster to protect future generations from the spectre of irreversible climate damage*".

"*Scotland has been a frontrunner in onshore wind and, while other renewable technologies are starting to reach commercial maturity, continued deployment of onshore wind will be key to ensuring our 2030 targets are met*".

2.5.3 The Foreword states that onshore wind has the ability to be deployed quickly, is good value for consumers and is also widely supported by the public. The Minister further states that:

"*This Statement, which is the culmination of an extensive consultative process with industry, our statutory consultees and the public, sets an overall ambition of 20 GW of installed onshore wind capacity in Scotland by 2030.*

While imperative to meet our net zero targets it is also vital that this ambition is delivered in a way that is fully aligned with, and continues to enhance, our rich natural heritage and native flora and fauna, and supports our actions to address the nature crisis and the climate crisis".

2.5.4 The OWPS is structured on the basis of eight chapters which contain a mix of policy guidance and also technical information. Key content of relevance to the Proposed Development is referenced below.

Renewable Energy Generation & Greenhouse Gas Emission Targets

2.5.5 Chapter 1 "Ambitions and Aspirations" (page 5) refers to current deployment of onshore wind in Scotland and 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*."

2.5.6 It is explained that National Grid's Future Energy Scenarios project concludes that **Scotland's peak demand for electricity will at least double within the next two decades and that this**

will require a substantial increase in installed capacity across all renewable technologies.

2.5.7 Paragraph 1.1.4 states "*our aim is to maintain the supportive policy and regulatory framework which will enable us to increase that deployment*".

2.5.8 In terms of existing deployment, paragraph 1.1.5 states that as of June 2022 the UK had 14.6 GW of installed onshore wind, with around 8.7 GW of this capacity within Scotland. Reference is made to a figure of 11.3 GW of onshore wind "*currently in the pipeline, spread over 217 potential projects*". The breakdown of capacity within the pipeline is shown below in **Table 2.3**.

Table 2.3: Onshore Wind Development Pipeline (June 2022)

Status of Onshore Wind Projects	Giga Watt (GW)	Comments
In the Planning / Consenting Process	5.53	Footnote on page 6 of OWPS applies. Not all projects will receive consent.
Awaiting Construction	4.56	The figures are subject to some duplication – e.g. where some projects have consent, are awaiting construction but are also subject to applications for tip height increases for example.
Under Construction	1.17	
Sub Total	11.26	
Operational Onshore Wind in Scotland	8.70	A number of projects will reach the end of their operational life. Not all will necessarily be repowered or life extended. A considerable proportion of the operational capacity will have passed its notional design life by 2030 and will be under consideration for decommissioning or repowering.
Total	19.96	

2.5.9 Within the table, the figure of 4.56 GW is denoted as "Awaiting Construction", however a footnote acknowledges that some of those projects with consent will need to re-apply or vary such consent to make changes to developments such as to increased tip heights, etc. It is also recognised that this will reduce the deliverable capacity.

2.5.10 There is also a figure of some 5.53 GW as representing projects that are within the planning system; but again, the footnote makes it clear that not all projects will receive consent.

2.5.11 A further point arising is that given consenting and construction timescales for onshore wind developments, projects that are not yet in the planning system are therefore unlikely to provide the "installed" capacity by the Scottish Government's key date of 2030.

2.5.12 The footnote to the figures set out on page 6 of the OWPS is therefore highly pertinent and is as follows:

"*Developments in the planning/consenting process have not yet been considered and given permission to proceed. Some of these projects will receive consent, but some may not, and it is unlikely that all of this noted capacity will be fully realised. A degree of duplication within the planning system must also be considered, where developments which have consent re-apply*

to adjust the parameters of that consent. This will also reduce the capacity which is deliverable from this overall figure".

2.5.13 Section 1.2 of the OWPS refers to the Deployment Ambition to 2030. Reference is made to the Climate Change Committee's position as set out in their exploratory scenarios for emissions to 2050 and also as referred to within the Sixth Carbon Budget.

2.5.14 Paragraph 1.2.2 of the OWPS states that: "*these estimate that, in every scenario, the UK will require a total of 25-30 GW of installed onshore wind capacity by 2050 to meet government targets - which would mean doubling the current UK installed capacity*".

2.5.15 Section 1.3 of the OWPS further refers to the new 20 GW ambition and acknowledges that the Scottish Government's Programme for Government 2022/2023 committed Government to enabling up to 12 GW of onshore wind to be developed and it is stated that:

"*It is vital to send a strong signal and set a clear expectation on what we believe onshore wind capacity will contribute in the coming years.*

In line with this commitment, and reflecting the natural life cycles of existing wind farms, this statement sets a new ambition for the deployment of onshore wind in Scotland:

A minimum installed capacity of 20 GW of onshore wind in Scotland by 2030.

This ambition will help support the rapid decarbonisation of our energy system, and the sectors which depend upon it, as well as aligning with a just transition to net zero whilst other technologies reach maturity".

2.5.16 This statement is followed by reference to the “Legislative Context”, in particular the Climate Change (Emissions Reduction Targets) (Scotland) Act 2019 and the related net zero greenhouse gas emissions targets. The OWPS states (paragraph 1.4.1) "*meeting these targets will require decisive and meaningful action across all sectors*".

2.5.17 Paragraph 2.4.2 states that "*onshore wind will play a crucial role in delivering our legally binding climate change targets*".

2.5.18 The Scottish Government has made clear that the 20 GW ambition of installed capacity is a “minimum”. In short, there is a substantial ‘hill to climb’ to attain that figure and projects that are not yet in the planning system are unlikely to provide installed capacity by 2030. This underlines the importance of the benefits that the Proposed Development can deliver – namely near-term delivery of a substantial volume of installed capacity.

2.5.19 This means that the Scottish Government’s ambition, as stated in December 2022, is to increase the installed capacity of onshore wind in Scotland by a minimum amount equivalent to about 130% of the entire installed capacity of all current operational onshore wind farms in Scotland in a period of around eight years. The Proposed Development and its contribution must be considered in the context of the sheer scale and urgency of the stated Scottish Government policy position.

Delivering the Government’s 20 Giga Watt Ambition for Onshore Wind

2.5.20 Chapter 2 of the OWPS entitled 'Delivering on our Ambition for Onshore Wind in Scotland' states that the Scottish Government is to form an Onshore Wind Strategic Leadership Group (SLG) and "*will task this SLG with taking forward the aspirations of this policy statement, and the development of an Onshore Wind Sector Deal*". This reflects the importance of the onshore wind sector.

2.5.21 Section 2.3 refers to a "Vision for Onshore Wind in Scotland" and states that Scottish Renewables, on behalf of the sector in Scotland, has produced a Vision Statement which the Government considers "*to lay the basis of a more detailed sector deal that the SLG will develop*".

2.5.22 The Onshore Wind Sector Deal was finalised and published in September 2023 and is referenced further below.

2.5.23 The **Vision Statement** is contained within Annex 5 of the OWPS (page 66). A summary of the Vision for the onshore wind industry in Scotland is a future where:

- An additional 12 GW of new onshore wind generation is constructed by 2030.
- Onshore wind continues to play a key role in decarbonising the power sector, reducing consumer costs and ensuring security of supply whilst playing a key role in the electrification of heat and transport.
- The selection of wind farm locations and technologies enables the use of the most productive modern turbines and balances the need to respect biodiversity and natural heritage.
- Land use for onshore wind is optimised and combined with other initiatives including reforestation and peatland restoration, as well as providing enhanced access to green space for recreation.
- New and repowering projects consistently receive high levels of public support.
- High skilled and sustainable jobs are created, including long term jobs in the operational phase.
- Material use is optimised, and carbon impact is minimised, through the principles of a circular economy.
- Community benefit and shared ownership provides lasting social and economic benefits; and
- Onshore wind plays a central role in ensuring a just transition for communities and people.

2.5.24 The Vision Statement states (page 67) that:

"*Onshore wind remains vital to meeting this increasing demand, providing fast deployment whilst minimising cost to the consumer. This will be achieved by deploying the most productive modern turbines that are taller than older models, by re-powering existing sites where possible and by maximising the use of our exceptional natural wind resource where environmental effects are acceptable*."

Balancing Environmental Considerations and Benefits

2.5.25 Chapter 3 of the OWPS "Environmental Considerations: Achieving Balance and Maximising Benefits" refers to matters relating to specific environmental topics as follows:

- Shared Land Use;
- Peat and Carbon-Rich Soils;
- Forestry;
- Biodiversity;
- Landscape and Visual Amenity; and
- Noise.

2.5.26 Landscape and Visual Amenity is addressed at Section 3.6 in Chapter 3 of the OWPS with direct cross references to NPF4. Paragraph 3.6.1 states (original emphasis):

"*Meeting our climate targets will require a rapid transformation across all sectors of our economy and society. This means ensuring the right development happens in the right place. Meeting the ambition of a minimum installed capacity of 20 GW of onshore wind in Scotland by 2030 will require taller and more efficient turbines. This will change the landscape."* (original emphasis)

2.5.27 As referenced below, NPF4 policy expressly recognises that significant landscape and visual impacts are to be expected and the OWPS emphasises that as a result there will be changes in Scotland's landscape.

2.5.28 Paragraph 3.6.2 of the OWPS, in cross-referencing NPF4, makes it clear that outside of National Parks and National Scenic 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*".

2.5.29 There is therefore express direction of greater weight being placed to the benefits of the development in terms of how it contributes to tackling the climate emergency. The removal of the Spatial Framework for onshore wind farms, as previously required by Scottish Planning Policy (SPP), also gives rise to fewer locational constraints.

2.5.30 Paragraph 3.6.5 makes reference to Landscape Sensitivity Studies and makes it clear that these should not be used in isolation to determine matters of acceptability but can be a useful tool in assessing specific sensitivities within an area. It should be noted that the term is now landscape sensitivity, in comparison with SPP paragraph 162 which encouraged Landscape Capacity Studies. This reflects NatureScot's 2022[12] guidance.

2.5.31 Paragraph 3.6.3 also makes reference to the NPF4 Policy 11 criteria with regard to energy development stating that "*where impacts are localised and/or appropriate design mitigation has been applied, they will generally be considered to be acceptable*".

Energy Systems & Regulation

2.5.32 Chapter 8 of the OWPS deals with 'Onshore Wind, Energy Systems and Regulation'. Section 8.2 refers to network planning and delivery and states:

"*Delivering our ambition of 20GW of onshore wind by 2030 will create demands on our electricity infrastructure. New developments will need to connect quickly to Scotland's distribution and transmission networks. Networks must be able to invest quickly and ahead of need in order to ensure swift and efficient connections for onshore wind developments*".

2.5.33 The Proposed Development could be built out within the 2030 target period. It should also be noted that NPF4 Policy 11 advises that grid capacity should not constrain renewable energy development, therefore any challenges facing developers in getting connected, including delays, are not matters for the planning decision makers to be concerned with.

2.5.34 Section 8.4 of the OWPS refers to security of supply and storage potential. Paragraph 8.4.1 recognises that onshore wind can play a greater part in helping to address the substantial challenges of maintaining security of supply and network resilience in a decarbonised electricity system.

Battery Storage

2.5.35 The OWPS makes specific reference to battery storage at Section 8.4 (Security of Supply and Storage Potential) and it states (paragraph 8.4.1) that the Scottish Government believes that:

[12] NatureScot, Landscape Sensitivity Assessment Guidance, paragraph 8 (2022).

"*Onshore wind can play a greater part in helping to address the substantial challenges of maintaining security of supply and network resilience in a decarbonised electricity system*".

2.5.36 At paragraph 8.4.5 the OWPS states that there has been an increase on onshore wind development co-located with battery storage facilities and:

"*as we continue to progress towards the decarbonisation of our energy system, battery storage will be more and more prevalent. On site battery storage not only reduces pressures from the grid, but enables more locally focused energy provision, and reduces costs to consumers.*

The Scottish Government will continue to support the co-location of both battery storage and hydrogen production facilities with onshore wind developments to help balance electricity demand and supply, add resilience to the energy system and support the production of renewable hydrogen to meet our future demands."

OWPS Conclusions

2.5.37 Page 49 of the OWPS sets out overall conclusions and these include *inter alia* the following key points:

- Deployment of onshore wind is "*mission critical for meeting our climate targets*".
- As an affordable and reliable source of electricity generation, "*we must continue to maximise our natural resource and deliver net zero in a way that is fully aligned with, and continues to protect our natural heritage and native flora and fauna*".
- A renewed commitment to this technology will ensure we keep "*leading the way in onshore wind deployment and support within the UK*".
- The Scottish Government has established "*a clear expectation of delivery with our ambition for a **minimum installed capacity of 20GW** of onshore wind in Scotland by 2030 and providing a vehicle for that delivery through the creation of* [the] *Onshore Wind Strategic Leadership Group*" (emphasis added).

2.5.38 It is stated that "*Onshore wind will remain an essential part of our energy mix and climate change mitigation efforts, but we are also in a nature crisis. Onshore wind farms must strike the right balance in how we care for and use our land*…".

2.5.39 The term "mission critical" is strong language and indicates onshore wind is crucial and extremely important to the attainment of the Government's policy and legislative objectives. This is fundamentally different policy language to that contained within National Planning Framework 3 (NPF3) and SPP.

2.6 The Draft Energy Strategy and Just Transition Plan

2.6.1 The Scottish Government published a new Draft 'Energy Strategy and Just Transition Plan' entitled 'Delivering a fair and secure zero carbon energy system for Scotland' on 10 January 2023. The new Strategy is to replace the one previously published in 2017. The consultation period ended in April 2023. As a draft document it can only be afforded limited weight. The draft document is however consistent with the adopted policy set out in the OWPS and NPF4 and the identification of the 2020s as a crucial decade for the large-scale delivery of renewable energy projects supporting urgent transition to net zero.

2.6.2 The Ministerial Foreword states:

"*The imperative is clear: in this decisive decade, we must deliver an energy system that meets the challenge of becoming a net zero nation by 2045, supplies safe and secure energy for all, generate economic opportunities, and builds a just transition*…

The delivery of this draft Energy Strategy and Just Transition Plan will reduce energy costs in the long term and reduce the likelihood of future energy cost crises….

It is also clear that as part of our response to the climate crisis we must reduce our dependence on oil and gas and that Scotland is well positioned to do so in a way that ensures we have sufficient, secure and affordable energy to meet our needs, to support economic growth and to capture sustainable export opportunities….

For all these reasons, this draft Strategy and Plan supports the fastest possible just transition for the oil and gas sector in order to secure a bright future for a revitalised North Sea energy sector focused on renewables."

2.6.3 The Foreword adds that the draft Strategy sets out key ambitions for Scotland's energy future including:

- More than 20 GW of additional renewable electricity on and offshore by 2030.
- Accelerated decarbonisation of domestic industry, transport and heat.
- Generation of surplus electricity, enabling export of electricity and renewable hydrogen to support decarbonisation across Europe.
- Energy security through development of our own resources and additional energy storage.
- A just transition by maintaining or increasing employment in Scotland's energy production sector against a decline in North Sea production.

2.6.4 The draft Strategy states (page 7, Executive Summary) that the vision for Scotland's energy system is:

"…*that by 2045 Scotland will have a flourishing, climate friendly energy system that delivers affordable, resilient and clean energy supplies for Scotland's households, communities and business. This will deliver maximum benefit for Scotland, enabling us to achieve a wider climate and environmental ambitions, drive the development of a wellbeing economy and deliver a just transition for our workers, businesses, communities and regions.*

In order to deliver that vision, this Strategy sets out clear policy positions and a route map of actions with a focus out to 2030".

2.6.5 A fundamental part of the Strategy is expanding the energy generation sector. The Executive Summary states (page 8) that Scotland's renewable resources mean that:

"….*we can not only generate enough cheap green electricity to power Scotland's economy, but also export electricity to our neighbours, supporting jobs here in Scotland and the decarbonisation ambitions of our partners.*

We are setting an ambition of more than 20 GW of additional low cost renewable electricity generation capacity by 2030, including 12 GW of onshore wind….

An additional 20 GW of renewable generation will more than double our existing renewable generation capacity by 2030……"

2.6.6 In terms of policy and onshore wind, the Strategy cross refers to NPF4 and the recently published OWPS and reiterates the new ambition for a deployment of a minimum further 12 GW of onshore wind by 2030.

2.6.7 Section 3.1.2 (page 64) states:

"*Scotland will embrace the opportunity to increase onshore wind capacity through turbine improvements. Taller and more efficient turbines can be deployed at both new developments and when considering the repowering of existing sites, providing significantly increased capacity, often without increasing the footprint of an existing site*".

Recognition of the role of Battery Storage

2.6.8 The Draft Strategy reiterates the support for energy storage set out in NPF4 (page 130). It states that:

"Batteries can be combined to provide energy storage: In a domestic setting supporting the energy efficiency of individual homes; In communities and neighbourhoods, supporting the energy efficiency of the local low energy network; In strategic locations and through aggregating a large number of fixed and vehicle batteries to support regional energy and grid balancing a high energy network".

2.6.9 Furthermore, it adds:

"Utility scale battery storage offers fast responding, dispatchable power when required. As of September 2021, only 124 MW of the total 864 MW of energy storage was provided by Battery Energy Storage Systems (BESS) capacity installed in Scotland. However, there is a further 2.1GW that has secured planning permission. Typically, these systems use lithium-ion technology, and only contain energy to dispatch full power continuously for a short number of hours. They also provide a number of ancillary services required to maintain stability within the electricity networks". (Page 130)

2.6.10 The Draft Strategy further recognises the potential contribution BESS can make to achieving Net Zero in summarising the key areas where it is considered that the UK Government needs to take action to support the delivery of the strategy with particular regard to energy system flexibility stating:

"We urge the UK Government to make ancillary markets more accessible for Battery Energy Storage Systems (BESS) and other low carbon technologies ahead of fossil fuel powered alternatives".

2.7 The Onshore Wind Sector Deal

2.7.1 The Onshore Wind Sector Deal (the 'Sector Deal') for Scotland was finalised in September 2023. It sets out a series of key measures which will support the Scottish Government in reaching its target of 20 GW of onshore wind by 2030. It describes how the Scottish Government, and the onshore wind sector will work together to deliver onshore wind farms quickly, sustainably and to the benefit of local communities and with the overall objective of attaining Scotland's net zero target.

2.7.2 The foreword sets out that:

"*The Government is committed to working with developers and stakeholders, understanding the operational barriers to delivering onshore wind projects and setting out processes to help reduce them. We also commit to speeding up consenting decisions, working with planning authorities and statutory consultees to increase skills and resources, as well as streamlining approaches.*

Jointly, we will work together on ensuring a balance is struck between onshore wind and the impacts on land use and the environment. We will collaborate to enable information to be collected and shared from monitoring and evidence purposes, and we jointly want to capitalise on the unique opportunity for Scotland to become a world leader in decommissioning, re-manufacturing and recycling of onshore wind assets."

2.7.3 It further adds that:

"*The Sector Deal is more than just a document; it is a testament to our determination, a celebration of our potential, and a promise to future generations. Let us work together to usher in an era where innovation, sustainability, and prosperity converge, as we power Scotland's greener future through the boundless energy of onshore wind*."

2.7.4 The matters within the Sector Deal to be actioned by a collaborative approach and also by specific actions from the sector and Government relate to:

- Supply chain, skills and the circular economy;
- Community and benefits;
- Land use and the environment;
- Planning;
- Legislative and regulatory actions; and
- Technical actions.

2.7.5 In terms of land use and the environment, the Sector Deal sets out that NPF4 Policy 1 makes it clear that significant weight needs to be given to the global climate and nature crisis and that "New onshore wind projects in Scotland will enhance biodiversity and optimise land use and environmental benefits" (page 11).

2.7.6 It further adds that:

"*Balancing the need for more wind farms with the safeguards defined in NPF4 will be a crucial aspect of achieving the 2030 onshore wind ambition. Scotland will continue to be a world leader in responsible onshore wind development, demonstrating how onshore wind can co-exist with a diversity of species, sensitive habitats, peatland, carbon rich soils and forestry, ensuring positive outcomes for the climate and nature*."

2.7.7 In terms of planning, a key matter is that there is an ambition to reduce the time it takes to determine Section 36 applications. The Sector Deal also states (page 13) in relation to planning that:

"*The ambition of 20 GW of installed onshore wind capacity by 2030 will require a significant number of new sites, the repowering and extension of existing sites and the realisation of unbuilt consented sites. Meeting this ambition will require the determination of applications to be made much more quickly than in recent years.*"

2.8 Conclusions on the Renewable Energy Policy & Legislative Framework

2.8.1 The Applicant's position is that the Proposed Development is strongly supported by the current renewable energy policy and legislative framework.

2.8.2 The trajectory, in terms of the scale and pace of action required to reduce emissions, grows ever steeper than before and it is essential that rapid progress is made through the 2020s. The rate of emission reductions must increase otherwise the legally binding target of an interim 75% reduction of GHG emissions by 2030 will not be met.

2.8.3 It is clear from the UK Energy White Paper and the forecasts by the CCC that electricity demand is expected to grow substantially (scenarios vary but potentially by a factor of three or four) as carbon intensive sources of energy are displaced by electrification of other industry sectors, particularly heat and transport.

2.8.4 Decisions through the planning system must be responsive to this changed position. Decision makers can do this by affording substantial weight to the energy policy objectives articulated above, in the planning balance. This is now very evident in the recent Section 36 decisions taken following adoption of NPF4. This is further referenced below in Chapter 6 where some quotations are drawn from recent decisions.

2.8.5 In the most recent renewable energy policy documents referred to, there is a consistent and what might be termed a 'green thread' which ties a number of related policy matters together: namely the urgent challenge of Net Zero and the need to substantially increase renewable capacity, notably onshore wind.

2.8.6 Overall, the Draft Energy Strategy forms part of the new policy approach alongside the new OWPS, the recent Sector Deal and the adopted NPF4. These documents confirm the Scottish Government's policy objectives and related targets, reaffirming the crucial role that onshore wind will play in response to the climate crisis which is at the heart of all these policies.

3. The Benefits of the Proposed Development

3.1 The Benefits: Summary

3.1.1 This Chapter summarises the benefits that would arise from the Proposed Development.

Renewable Energy Generation

> With an overall installed capacity in the region of **205.6 MW** (including approximately 100 MW of battery storage), the Proposed Development would make a valuable and nationally important contribution to the attainment of the UK and Scottish Government policies of encouraging renewable energy developments; and in turn contribute to the achievement of UK and Scottish Government targets. As explained, there is now a distinct shift in policy emphasis from the displacement of higher carbon electricity generation to extending the use of electricity as the critical energy response to the Climate Emergency.

> The UK legally binding target of net zero GHG emissions by 2050 and the Scottish Government target of a 75% reduction of such emissions by 2030 and net zero by the earlier date of 2045 are major challenges. The Scottish Government has made it clear that onshore wind plays a vital and indeed "*mission critical*" role in the attainment of future targets in relation to helping to combat the crisis of global heating.

> The earlier that steps towards decarbonisation are introduced, the greater their contribution to limiting climate change. The Proposed Development's delivery of renewable capacity in the near term will have a disproportionately higher benefit than the same capacity delivered later.

Emissions Savings

> Chapter 14 (Aviation and Other Issues) of the EIAR makes reference to the carbon reduction benefits of the Proposed Development. The carbon balance calculations establish that the Proposed Development could result in the saving of approximately 69,000 tonnes of carbon dioxide equivalent emissions per annum if a fossil fuel mix of electricity generation were used as the counterfactual.

3.1.2 It is expected to take 2.8 years for the carbon loss during wind farm construction (including through turbine manufacture, construction of foundations and excavation of peat) to be 'paid back' by the carbon saved through generating electricity from a renewable energy source.

Security of Supply

> The British Energy Security Strategy has been referenced. It provides an increase to the requirements for both the scale and the urgency of delivery of new low carbon generation capacity, by refocussing the requirement for low-carbon power for reasons of national security of supply and affordability, as well as for decarbonisation.

> With this context, the attractiveness of onshore wind, a proven technology which will deliver significant benefits to consumers through decarbonisation, security of supply and affordability this decade, becomes clear, especially when co-located with battery storage.

> The Proposed Development, if consented, would provide a valuable contribution to security of supply for the north-east region, Scotland and for the wider Great Britain (GB) area. Consenting the Proposed Development, would contribute to an adequate and dependable Scottish and GB generation mix, through enabling the generation of more low carbon power from indigenous and renewable resources, and would enable the proposed development to make a significant contribution to Scottish and wider UK energy security and decarbonisation needs.

Battery Storage

> In Scotland in particular, there is, as explained in the previous Chapter, very strong support for renewable generation, which is inherently intermittent. The BESS element of the Proposed Development (circa 100 MW) would therefore help to smooth over peaks and troughs in electricity supply, being able to respond at short notice to requests from National Grid to generate, such as periods when renewable sources are not generating, are constrained off, or fossil fuel plants are unexpectedly offline. There is a clear requirement to balance the peaks and troughs associated with electricity supply and demand, to manage the strain on the transmission and distribution networks.

> The Proposed Development would be able to respond at short notice to requests from National Grid to balance the network, such as periods when renewable sources are not generating, and backup sources are required to counteract the intermittency of renewable sources such as wind energy. The flexibility and support for existing renewable sources is vital to ensure further use and deployment of renewable energy sources throughout Scotland. The benefits of co-locating wind energy generation and BESS has been set out in the previous Chapter with reference to the OWPS and the Draft Energy Strategy and Just Transition Plan.

Economic & Community Socio-Economic Benefits

> The Proposed Development would support jobs during construction and during operation across the Scottish economy. Overall, the socio-economic effects of the capital investment, employment and GVA to the economy would be beneficial (short term during construction, long term during operation).

> Chapter 13 of the EIAR (Socio Economics) addresses socio economic effects. In addition a Socio-Economic Appraisal is contained at **Appendix 1** of this Statement. Key benefits would include the following:

- The Proposed Development would involve an estimated overall capital investment of approximately £140 million.
- It is estimated that around a third of investment into capital expenditure will occur within Scotland (£42.12 million) as a whole, with a third of that figure accruing to Aberdeenshire (£14.04 million).
- Approximately 604 job years are expected to be created in Scotland during the **construction phase**, with approximately 169 job years created in Aberdeenshire.
- The Proposed Development could also generate £32.5 million in GVA to Scotland, and £10.6 million to Aberdeenshire.
- A large proportion of the direct benefits associated with the Proposed Development are likely to be focused around the construction phase, as this will provide the largest increase in economic activity. The operations and maintenance phase in contrast, while over a longer period of time, will involve a different type of work and therefore does not offer as many direct economic benefits to Scotland and Aberdeenshire.

- The direct socio-economic impacts will give way to wider economic impacts. This is due to 'ripple' effects created throughout the wider supply chain of the Proposed Development and the local and national economies.
- In essence, the wider economic benefit felt in Scotland nearly doubles the direct impact. This underscores the valuable economic opportunity from the Proposed Development, both for Scotland and Aberdeenshire.
- In terms of the **operational phase**, around 37 Full-time equivalent (FTE) jobs are expected to be created annually in Scotland, with around 19 FTEs being created in Aberdeenshire.
- In the operational phase, the Proposed Development will also generate £1.90 million in GVA annually for Scotland, and £1.32 million for Aberdeenshire.

> **Local supply chain opportunities**.

- The Applicant will host 'Meet the Buyer' events and suitably qualified local firms invited to bid for different aspects of construction, such as foundation laying and electrical works. Construction materials are normally sourced locally (i.e. within Aberdeenshire) and local transport and plant hire companies used wherever possible.

> **Forming links with local businesses**.

- There are civil engineering contractors adjacent to the site in the form of Miller Plant and McIntosh Plant. There are quarries in the area including Breedon Aggregates on the Dunecht Estate which is an option for sourcing stone from if required.
- The site is on the Dunecht Estate which is a large landholding with local employment which the Proposed Development has the potential to help support through the property rental.

> **Community Investment Programme**, which could involve:

- A Hill of Fare Masterplan (Figure 13.1 in the EIAR) has been produced to showcase the developments/benefits within and outside the site associated with the Proposed Development during the operational phase. The temporary enabling works compound at the site entrance will become permanent public car parking. The upgraded and new access tracks for the Hill of Fare Wind Farm will provide improved non-vehicular public access across the site.
- In addition, the proposed Cultural Heritage Trail will improve non-vehicular access between Scheduled Monuments and to the Hill of Fare and provide improved visitor experience through information boards about the assets. Interpretation can also relate to proposed biodiversity enhancements.
- Land rental income from the Hill of Fare Wind Farm will open opportunity for Dunecht Estate to potentially renovate the shooting lodge on Site making it an off-grid shelter for visitors to rest and discover more about the Estate.
- There are locations elsewhere on the Dunecht Estate where EV Chargers could be developed through the Community Benefits Package including the abandoned fuel station in the centre of Echt.
- The Masterplan also identifies the location of known contractors local to the Site that have been recognised for potential to supply aggregates, materials, plant & machinery, storage and heavy haulage during construction.

Community Benefit Funds.

- The intended community benefit package for the Proposed Development includes a community benefit fund and an opportunity for the local community to invest in the Proposed Development once operational. Income streams from this community benefits package could provide long term revenue to support local community initiatives.
- Depending on the initiatives and projects brought forward by the local community these could provide positive benefits to the local economy, local facilities and the general quality of life for local residents.
- The Applicant commits to a community benefit fund of up £5,000 per MW per annum, index linked throughout the operational period of the Proposed Development. Based on the 105.6 MW capacity and an operational period of 50 years this is equivalent to at least £26.4M of community investment.
- As part of this offering, the Applicant is consulting on a unique Local Electricity Discount Scheme (LEDS) which offers an annual discount to the electricity bills of those properties closest to the Proposed Development.

Shared Ownership

- The Applicant is also considering the development of a model for community shared ownership, offering the community the opportunity to invest up to 10% in the Proposed Development. Feedback was sought from the public on this offer at the last round of public exhibitions in June 2023. It will be developed and details for it expected to be presented to the relevant community councils post-submission.

Biodiversity Enhancement

> Biodiversity enhancements are proposed by way of an Outline Biodiversity Enhancement and Management Plan (OBEMP[13]). It details the proposed enhancement measures and aims of prescribed habitat measures looking to significantly improve the biodiversity associated with the site from the baseline conditions.

> The OBEMP will be developed as an iterative document and implemented during the construction and operation phases that will focus on the enhancement and restoration of habitat including blanket bog. The OBEMP outlines measures to be implemented to restore an area of up to approximately 220 ha of blanket bog, seeking to achieve a significant gain in habitat condition and biodiversity across what is currently heavily degraded and modified bog.

3.1.3 In addition, in relation to benefits, feedback from the community consultation undertaken on the application is relevant. The Applicant has completed a series of community consultation events, and a Pre-Application Consultation (PAC) Report has been prepared and is submitted as part of the supporting information package for the Section 36 application. It should be referred to for its detail, but in summary, there was a considerable amount of community views raised in regard to proposals for recreational enhancements, views on local energy discount proposals and shared ownership and community investment ideas in relation to education, skills, transport and community infrastructure.

[13] Technical Appendix 8.5 of the EIAR.

4. Appraisal against NPF4

4.1 Introduction

4.1.1 NPF4 was approved by resolution of the Scottish Parliament on 11 January 2023 and came into force at 9am on 13 February 2023.

4.1.2 A Chief Planner's Letter was issued on 8 February 2023 entitled 'Transitional Arrangements for National Planning Framework 4'. It contains advice intended to support consistency in decision making ahead of new style Local Development Plans being in place.

4.1.3 The Letter confirms with regard to the Development Plan that from 13 February, NPF3 and Scottish Planning Policy (SPP) no longer represent Scottish Ministers' planning policy and should not form the basis for or be a consideration to be taken into account when determining planning applications.

4.2 Development Management

4.2.1 For the purposes of Section 36 decision making, acknowledging that Section 25 of the 1997 Act is not engaged, NPF4 in its approved form is a significant material consideration in the overall decision-making process.

4.2.2 Section 13 of the Planning (Scotland) Act 2019 Act amends Section 24 of the 1997 Act regarding the meaning of the statutory 'development plan', such that for the purposes of the 1997 Act, the Development Plan for an area is taken as consisting of the provisions of:

> The National Planning Framework; and

> Any Local Development Plan (LDP).

4.2.3 Therefore the statutory Development Plan covering the site consists of NPF4 and the Aberdeenshire Local Development Plan 2023 (adopted 13 January 2023) (the 'ALDP').

4.2.4 The publication of NPF4 coincided with the implementation of certain parts of the 2019 Act. A key provision is that in the event of any incompatibility between a provision of NPF4 and a provision of an LDP, then whichever of them is the later in date will prevail. That will include where an LDP is silent on an issue that is now provided for in NPF4.

4.2.5 Section 13 of the 2019 Act amends Section 24 of the Town and Country Planning (Scotland) Act 1997 (the 1997 Act) to provide that:

"*In the event of any incompatibility between a provision of the National Planning Framework and a provision of a local development plan, whichever of them is the later in date is to prevail*."

4.2.6 In this case, the ALDP was adopted in January 2023, one month prior to NPF4 coming into effect. The Council's adoption statement confirms that the ALDP 2023 was written to accord with the National Planning Framework 3 (now superseded), and to be consistent with the Aberdeen City and Shire Strategic Development Plan 2010 (which no longer has any legal effect). The Council has advised that the next LDP will be prepared on a timetable that will see its adoption in or before 2028.

4.2.7 In terms of emerging LDPs prepared prior to the adoption and publication of NPF4, the Chief Planner's Letter of 08 February states that it may be that there are opportunities to reconcile identified inconsistencies with NPF4 through the Examination process.

4.2.8 The Chief Planner's Letter also states with regard to Supplementary Guidance associated with LDPs which were in force before 12 February 2023 (the date on which Section 13 of the 2019 Act came into force) that they will continue to be in force and be part of the Development Plan.

4.3 How NPF4 is to be used

4.3.1 Annex A (page 94) of NPF4 explains how it is to be used. It states:

"*The purpose of planning is to manage the development and use of land in the long-term public interest … Scotland in 2045 will be different. We must embrace and deliver radical change so we can tackle and adapt to climate change, restore biodiversity loss, improve health and wellbeing, reduce inequalities, build a wellbeing economy and create great places*."

4.3.2 Annex A states that NPF4 is required by law to set out the Scottish Ministers' policies and proposals for the development and use of land. It adds:

"*It plays a key role in supporting the delivery of Scotland's national outcomes and the United Nations Sustainable Development Goals[14]. NPF4 includes a long-term spatial strategy to 2045*."

4.3.3 NPF4 contains a spatial strategy and Scottish Government development management policies to be applied in all consenting decisions, and it identifies national developments which are aligned to the strategic themes of the Government's Infrastructure Investment Plan[15] (IIP).

4.3.4 NPF4 therefore for the first time, introduces centralised development management policies which are to be applied Scotland wide. It also provides guidance to Planning Authorities with regard to the content and preparation of LDPs.

4.3.5 Annex A adds 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 discrimination and also, of particular relevance to the Proposed Development, "*meeting any targets relating to the reduction of emissions of greenhouses gases, and, securing positive effects for biodiversity*".

4.4 The National Spatial Strategy – Delivery of Sustainable Places

4.4.1 Part 1 of NPF4 sets out the Spatial Strategy for Scotland to 2045 based on six spatial principles which are to influence all plans and decisions. The introductory text to the Spatial Strategy starts by stating (page 3):

"*The world is facing unprecedented challenges. The global climate emergency means that we need to reduce greenhouse gas emissions and adapt to the future impacts of climate change*."

4.4.2 The principles are stated as playing a key role in delivering the United Nation's Sustainable Development Goals and the Scottish Government's National Performance Framework[16].

4.4.3 The Spatial Strategy is aimed at supporting 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*".

4.4.4 Page 6 of NPF4 addresses the delivery of sustainable places. Reference is made to the consequences of Scotland's changing climate, and it states, *inter alia*:

[14] The 17 UN Sustainable Development Goals are set out at page 95 of NPF4 and include *inter alia* 'affordable and clean energy' and 'climate action'.

[15] The Scottish Government's five-year Infrastructure Investment Plan (2021-22 to 2025-26) was published in February 2021. It set out a vision for Scotland's future infrastructure in order to support and enable an inclusive net zero emissions economy.

[16] The Scottish Government National Performance Framework sets out 'National Outcomes' and measures progress against a range of economic, social and environmental 'National Indicators'.

"*Scotland's Climate Change Plan, backed by legislation, has set our approach to achieving net zero emissions by 2045, and we must make significant progress towards this by 2030…Scotland's Energy Strategy will set a new agenda for the energy sector in anticipation of continuing innovation and investment*."

4.4.5 The new Energy Strategy and Just Transition Plan for Scotland (as referenced in NPF4) was published as a consultative draft on 10 January 2023 (see below).

4.4.6 The National Spatial Strategy in relation to 'sustainable places' is described (page 7) as follows:

"*Scotland's future places will be net zero, nature-positive places that are designed to reduce emissions and adapt to the impacts of climate change, whilst protecting, recovering and restoring our environment.*

Meeting our climate ambition will require a rapid transformation across all sectors of our economy and society. This means ensuring the right development happens in the right place.

Every decision on our future development must contribute to making Scotland a more sustainable place. We will encourage low and zero carbon design and energy efficiency, development that is accessible by sustainable travel, and expansion of renewable energy generation."

4.4.7 Six National Developments (NDs) support the delivery of sustainable places, one being 'Strategic Renewable Electricity Generation and Transmission Infrastructure'.

4.4.8 A summary description of this ND is provided at page 7 of NPF4 as follows:

"*Supports electricity generation and associated grid infrastructure throughout Scotland, providing employment and opportunities for community benefit, helping to reduce emissions and improve security of supply*".

4.4.9 Page 8 of NPF4 sets out 'Cross-cutting Outcome and Policy Links' with regard to reducing greenhouse gas emissions. It states:

"*The global climate emergency and the nature crisis have formed the foundations for the spatial strategy as a whole. The regional priorities share opportunities and challenges for reducing emissions and adapting to the long-term impacts of climate change, in a way which protects and enhances our natural environment*."

4.4.10 A key point in this statement is that the climate emergency and nature crisis are expressly stated as forming the foundations of the national spatial strategy. Recognising that tackling climate change and the nature crisis is an overriding imperative which is key to the outcomes of almost all policies within NPF4.

4.5 National Developments

Overview

4.5.1 Page 97 of NPF4 sets out that 18 National Developments have been identified. These are described as:

"*significant developments of national importance that will help to deliver the spatial strategy … National development status does not grant planning permission for the development and all relevant consents are required*".

4.5.2 It adds that:

"*Their designation means that the principle for development does not need to be agreed in later consenting processes, providing more certainty for communities, businesses and investors. … In addition to the statement of need at Annex B, decision makers for applications for consent for national developments should take into account all relevant policies*".

4.5.3 Annex B of NPF4 sets out the various NDs and related Statements of Need. It explains that NDs are significant developments of national importance that will help to deliver the Spatial Strategy. It states (page 99) that:

"*The statements of need set out in this annex are a requirement of the Town and Country Planning (Scotland) Act 1997 and describe the development to be considered as a national development for consent handling purposes*".

National Development 3 "Strategic Renewable Electricity Generation and Transmission Infrastructure"

4.5.4 Page 103 of NPF4 describes ND3 and it states:

"*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. Certain types of renewable electricity generation will also be required, which will include energy storage technology and capacity, to provide the vital services, including flexible response, that a zero carbon network will require. Generation is for domestic consumption as well as for export to the UK and beyond, with new capacity helping to decarbonise heat, transport and industrial energy demand. This has the potential to support jobs and business investment, with wider economic benefits.

The electricity transmission grid will need substantial reinforcement including the addition of new infrastructure to connect and transmit the output from new on and offshore capacity to consumers in Scotland, the rest of the UK and beyond. Delivery of this national development will be informed by market, policy and regulatory developments and decisions."

4.5.5 The location for ND3 is set out as being all of Scotland and in terms of need it is described as:

"*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*."

4.5.6 Reference is made to the designation and classes of development which would qualify as ND3, and it states in this regard:

"*A development contributing to 'Strategic Renewable Electricity Generation and Transmission' in the location described, within one or more of the Classes of Development described below and that is of a scale or type that would otherwise have been classified as 'major' by 'The Town and Country Planning (Hierarchy of Developments) (Scotland) Regulations 2009', is designated a national development:*

*(a**) on and off shore 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." (emphasis added)

4.5.7 As regards the Proposed Development, having an installed capacity of over 50 MW, it satisfies the minimum threshold set for a ND therefore it would have national development status. The Proposed Development is of national importance for the delivery of the national Spatial Strategy.

4.5.8 The Strategy requires a "*large and rapid increase*" in electricity generation from renewables and the National Spatial Strategy makes it clear (NPF4, page 6) that "*we must make significant progress*" by 2030.

4.5.9 The Proposed Development could make a meaningful contribution to targets within this key timescale and that is a very important consideration.

4.6 National Planning Policy

4.6.1 Part 2 of NPF4 (page 36) addresses national planning policy by topic with reference to three themes formulated with the aim of delivering sustainable, liveable and productive places.

4.6.2 In terms of planning, development management and the application of the national level policies, 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*".

4.6.3 In terms of "sustainable places" the relevant policies to the Proposed Development include the following:

- Policy 1: Tackling the Climate and Nature Crisis;
- Policy 3: Biodiversity;
- Policy 4: Natural Places;
- Policy 5: Soils;
- Policy 6: Forestry, Woodland and Trees;
- Policy 7: Historic Assets and Places;
- Policy 11: Energy;
- Policy 22: Flood Risk and Water Management; and
- Policy 33: Minerals.

4.6.4 These policies are addressed below.

4.6.5 The Chief Planner's Letter of 08 February 2023 provides advice in relation to applying NPF4 policy. It states that the application of planning judgement to the circumstances of an individual situation remains essential for all decision making, informed by principles of proportionality and reasonableness. It states:

"*It is important to bear in mind NPF4 must be read and applied as a whole. The intent of each of the 33 policies is set out in NPF4 and can be used to guide decision making. Conflicts between policies are to be expected. Factors for and against development will be weighed up in the balance of planning judgement*."

4.6.6 The Letter adds:

"*It is recognised that it may take some time for planning authorities and stakeholders to get to grips with the NPF4 policies, and in particular the interface with individual LDP policies. As outlined above, in the event of any incompatibility between the provision of NPF and the provision of an LDP, whichever of them is the later in date is to prevail. Provisions that are contradictory or in conflict would be likely to be considered incompatible*".

4.7 NPF4 Policy 1: Tackling the Climate and Nature Crisis

Policy 1 & Principles

4.7.1 The intent of Policy 1 is "*to encourage, promote and facilitate development that addresses the global climate emergency and nature crisis*".

4.7.2 **Policy 1** directs decision makers that "*when considering all development proposals significant weight will be given to the global climate and nature crises*."

4.7.3 This is a radical departure from the usual approach to policy and weight, and clearly denotes a step change in planning policy response to climate change. The matter of weight is no longer left entirely to the discretion of the decision maker. Significant weight should therefore be attributed to the Proposed Development given it would be consistent with the intent of Policy 1 and would make a positive contribution by helping to attain its outcome of net zero.

4.7.4 The Chief Planner's Letter of 08 February 2023 refers to Policy 1. It states:

"*This policy prioritises the climate and nature crises in all decisions. It should be applied together with the other policies in NPF4. It will be for the decision maker to determine whether the significant weight to be applied tips the balance in favour for, or against a proposal on the basis of its positive or negative contribution to the climate and nature crises*."

4.7.5 This statement from the Chief Planner confirms that the decision maker must apply significant weight, but it is for the decision maker to decide if it is for or against the proposal. The Proposed Development's contribution is positive and therefore the **significant weight in this case is for the Proposed Development**.

4.7.6 The term "Tackling" the respective crises in Policy 1 is also important – this means that decision makers should ensure an urgent and positive response to these issues and take positive action. Furthermore, NPF4 (page 8) refers to cross cutting outcomes and states with regard to Policy 1 that the policy gives significant weight "*to the global climate emergency in order to ensure that it is recognised as a priority in all plans and decisions*".

The Application of Policy 1

4.7.7 Given the nature of the Proposed Development it would make a valuable contribution in relation to targets. It will directly further the policy intent and outcomes of Policy 1 and should be afforded significant positive weight in terms of tackling the climate and nature crises. The specific emission and carbon saving benefits (set out in Chapter 3 above) also need to be recognised in the context of NPF4 Policy 11 (Energy) which requires the contribution that a development would make to targets to be taken into account.

4.7.8 A further important point is the need to recognise that the greatest threat to biodiversity is climate change. The principal and essential benefit of the Proposed Development is a significant contribution of renewable energy, to facilitate the earliest possible decarbonisation of the energy system and the achievement of "net zero" no later than 2045, in accordance with the objectives of the Climate Change (Scotland) Act 2009 (as amended). The purpose of net zero is to protect biodiversity and the earlier it can be achieved, the greater the benefits to biodiversity.

4.7.9 The Reporter's comments on this particular policy in the Sanquhar II Inquiry Report[17] are informative. At paragraph 2.48 of the Supplementary Report, the Reporter addresses NPF4 Policy 1 and states that:

[17] Sanquahr II Wind Farm, Section 36 Decision dated 31 August 2023, Supplementary Report of Inquiry dated 20 February 2023 (Case Reference WIN-170-2006) and Scottish Ministers' Decision dated 31 August 2023.

"*tackling the nature crisis is required to be given significant weight alongside the climate crisis. There is no indication that one strand should be given greater priority over the other. That does not necessarily mean that an individual proposal must be shown to respond to both crises in equal measure, however. The two matters are also inextricably linked, with the nature crisis being, in part, exacerbated by climate change*."

4.7.10 Furthermore, as explained below with reference to NPF4 Policy 3, biodiversity enhancement measures are proposed as part of the Proposed Development.

4.8 NPF4 Policy 11: Energy

Policy 11 & Principles

4.8.1 For the consideration of wind energy development, Policy 11 'Energy' (page 53) is the lead policy. Policy 11's intent is set out as:

"*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 emission technologies including hydrogen and carbon capture utilisation and storage.*"

4.8.2 Policy Outcomes are identified as: "*expansion of renewable, low carbon and zero emission technologies*".

4.8.3 Policy 11 is as follows:

"a) Development proposals for all forms of renewable, low-carbon and zero emissions technologies will be supported. These include:

i. wind farms including repowering, extending, expanding and extending the life of existing wind farms;

ii. enabling works, such as grid transmission and distribution infrastructure;

iii. energy storage, such as battery storage and pumped storage hydro;

iv. small scale renewable energy generation technology;

v. solar arrays;

vi. proposals associated with negative emissions technologies and carbon capture; and

vii. proposals including co-location of these technologies.

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

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.

d) Development proposals that impact on international or national designations will be assessed in relation to Policy 4.

e) In addition, project design and mitigation will demonstrate how the following impacts are addressed:

i. impacts on communities and individual dwellings, including, residential amenity, visual impact, noise and shadow flicker;

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;

iii. public access, including impact on long distance walking and cycling routes and scenic routes;

iv. impacts on aviation and defence interests including seismological recording;

v. impacts on telecommunications and broadcasting installations, particularly ensuring that transmission links are not compromised;

vi. impacts on road traffic and on adjacent trunk roads, including during construction;

vii. impacts on historic environment;

viii. effects on hydrology, the water environment and flood risk;

ix. biodiversity including impacts on birds;

x. impacts on trees, woods and forests;

xi. proposals for the decommissioning of developments, including ancillary infrastructure, and site restoration;

xii. the quality of site restoration plans including the measures in place to safeguard or guarantee availability of finances to effectively implement those plans; and

xiii. cumulative impacts.

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.

Grid capacity should not constrain renewable energy development. It is for developers to agree connections to the grid with the relevant network operator. In the case of proposals for grid infrastructure, consideration should be given to underground connections where possible.

f) Consents for development proposals may be time-limited. Areas identified for wind farms are, however, expected to be suitable for use in perpetuity".

4.8.4 The intent and desired outcome of the policy is expressly clear – the expansion of renewable energy, through encouragement, promotion and facilitation, all of which the Proposed Development will help to deliver.

4.8.5 The wording of Policy 11 Paragraph (a)(i) makes it clear that the policy supports new wind farms and paragraph (vii) provides clear support for proposals including co-location of the wind farms and energy storage technology.

Differences with Scottish Planning Policy

4.8.6 **Paragraph a) of Policy 11** states a position of express "support" for wind farm development.

4.8.7 The development management topic provisions within Policy 11 largely reflect those of the former SPP, but there are some significant differences, namely:

- the role of renewable energy generation and greenhouse gas emissions reduction targets and a specific instruction to decision makers to apply significant weight to that consideration;
- wind farms will not be supported in National Parks or National Scenic Areas but outside of these areas the policy is one, as noted, of "general support". There is no longer any 'spatial framework' approach. This is a fundamental shift in approach;

- the statement that significant landscape and visual impacts are "to be expected" i.e. they are to be treated as normal, and an understood and tolerable outcome of the policy objective;
- "generally" acceptable development in terms of landscape and visual impacts is where landscape impacts are "*localised and / or appropriate design mitigation has been applied*";
- renewed emphasis on economic benefits and the need to maximise economic impact including local and community socio-economic benefits; and
- the omission of references to tourism which is likely to be an acceptance of the lack of impact on tourism from wind farms.

The application of Policy 11

4.8.8 **Paragraph c) of Policy 11** requires socio-economic benefits to be maximised, rather than just taken into account.

4.8.9 Socio-economic effects are set out in Chapter 13 (Socio-Economics) of the EIAR and the various benefits that would arise have been summarised in Chapter 3 above and in the appended appraisal (**See Appendix 1**). Socio-economic benefits have been maximised.

4.8.10 **Paragraph d) of Policy 11** states that development proposals that impact on international and national designations "*will be assessed in relation to Policy* 4". Policy 4 also deals with impacts in relation to local landscape designations. Therefore, the matter of the impacts of the Proposed Development in relation to such national and local designations is examined further below with specific regard to the provisions of Policy 4.

4.8.11 **Paragraph e) of Policy 11** states that project design and mitigation "will demonstrate how" impacts are addressed. These are listed in the quotation of the policy above and are addressed in turn below.

Impacts on Communities and Individual Dwellings - Residential Visual Amenity

4.8.12 As set out in the EIAR Chapter 6 (Landscape and Visual Impact Assessment – 'LVIA'), careful consideration has been given to the visual effects of the Proposed Development from settlements and individual dwellings through the LVIA and by way of the Applicant's Residential Visual Amenity Assessment (RVAA).

4.8.13 The nearest settlements are Torphins, located approximately 3.4 km to the west of the site, Midmar located 3.6 km to the north, Echt located approximately 4 km to the north-east and Banchory located approximately 6 km to the south.

4.8.14 In relation to settlements, the assessment found that all of the settlements within 5 km of the proposed turbines (Torphins, Midmar, Echt, Inchmarlo and Banchory) would experience significant visual effects during daylight and dark sky hours and settlements within 5 to 10 km brought forward into detailed assessment would also experience significant visual effects during daylight and dark sky hours.

4.8.15 Appropriate offsets from all residential properties have been maintained to ensure that no property would experience an overbearing visual impact.

4.8.16 There are 28 residential properties within 2 km of the nearest proposed turbines. In terms of the effects upon these residential properties, it is set out in the RVAA that twelve of the 28 properties would experience a significant visual effect from either a part of their house, garden or principal access route.

4.8.17 It is concluded however that when the experience from each property is considered in the round, none of the residents of any of the properties would experience such an overbearing or overwhelming effect on their visual amenity that their properties would become unattractive places in which to live.

4.8.18 It is not considered that the visual effects on settlements or individual properties would be so severe to breach the residential visual amenity threshold whether considered on individual or community basis. This is confirmed in the Applicant's RVAA contained at Appendix 6.6 of the EIAR.

Noise and Shadow Flicker

4.8.19 Noise is addressed in Chapter 12 (Acoustics) of the EIAR. The acoustic impact for the operation of the Proposed Development on nearby residential properties has been assessed in accordance with the guidance on wind farm noise as issued in the DTI publication 'The Assessment and Rating of Noise from Wind Farms', otherwise known as ETSU-R-97, and Institute of Acoustics Good Practice Guide (IoA GPG), as recommended for use by relevant planning policy.

4.8.20 To establish baseline conditions, background noise surveys were carried out at nearby properties and the measured background noise levels used to determine appropriate noise limits, as specified by ETSU-R-97 and the IoA GPG.

4.8.21 Operational noise levels were predicted using the recommended noise propagation model. The predicted noise levels for the Proposed Development are within the derived noise limits at all considered wind speeds. The Proposed Development therefore complies with the relevant guidance on wind farm noise and the impact on the amenity of all nearby residential properties would be regarded as acceptable.

4.8.22 A construction noise assessment carried out in accordance with BS 5228-1:2009 'Noise control on construction and open sites - Part 1: Noise' found that construction noise levels are predicted to temporarily exceed construction noise criteria at a limited number of nearby properties although appropriate mitigation measures have been identified.

4.8.23 Shadow flicker is addressed in Chapter 14 (Aviation and Other Issues) of the EIAR. The assessment identifies that shadow flicker could affect a small number of properties; however, standard mitigation measures can be incorporated into the operation of the Proposed Development to reduce the instance of shadow flicker. Mitigation measures include planting tree belts between the affected dwelling and the responsible turbine(s) and shutting down individual turbines during periods when shadow flicker could theoretically occur.

Landscape and Visual Considerations

4.8.24 Before examining the landscape and visual effects of the Proposed Development, Part e(ii) of Policy 11 makes it clear and recognises that in terms of significant landscape and visual impacts, such impacts are to be expected for some forms of renewable energy. This is a very different starting point compared to the position in the former SPP and there is a very clear steer that significant effects are to be expected, and where localised and/or subject to appropriate design mitigation, they should generally be acceptable.

Overview of Design Approach

4.8.25 As set out in Chapter 3 (Design Evolution and Alternatives) of the EIAR, the design of the Proposed Development has progressed through various layout iterations.

4.8.26 It is explained that the overall siting and design has been to achieve a coherent and compact design for the wind farm which minimises direct and indirect adverse effects on the local and wider landscape, while balancing commercial considerations and maximising energy production.

4.8.27 As part of the iterative approach adopted by the Applicant, a number of design principles have been incorporated into the Proposed Development as standard practice, including the following:

> consideration of the underlying landscape and its scale;

- consideration of operational, consented and proposed wind turbines in the context area;
- consideration of the size and scale of the Proposed Development appropriate to the location and proximity to residential properties;
- sensitive siting of the proposed infrastructure incorporating appropriate buffer distances from environmental and archaeological receptors to avoid or reduce effects;
- maximising the re-use of existing tracks as much as possible to access proposed turbine locations;
- optimising the alignment of new access tracks and hardstands taking due consideration of the topography of the site, to minimise cut and fill, minimise the impact on sensitive peatland habitats and reduce landscape and visual effects;
- adoption of floating access tracks to minimise disturbance of peat where appropriate;
- minimising watercourse crossings and encroachment on watercourse buffers;
- identifying areas for enhancement onsite including biodiversity;
- inclusion of borrow pit search areas to minimise the volume of the stone required to be imported to the site;
- using the latest turbine technology, consisting of more efficient and larger turbines where these can be reasonably accommodated within the landscape; and
- maximising the potential energy yield of the Proposed Development through the employment of co-located technology in optimal locations (wind and BESS).

4.8.28 Therefore, overall, the design approach has been responsive to the various environmental and technical opportunities and constraints presented by the site and its immediate context. It is considered that the overall approach to the design of the project has implemented appropriate design mitigation in arriving at the final layout. This is an important requirement of NPF4 Policy 11 (Energy).

Landscape Character

4.8.29 The Proposed Development would be sited on a narrow upland plateau flanked by hillslopes and extensive forest plantation forming a notable topographical feature experienced in many views from the wider surrounding lower-lying landscape. The proposed turbines and associated infrastructure are located within LCT 22 Moorland Plateau (i) Grampian Outliers.

4.8.30 The Proposed Development would result in direct and significant effects on the part of the landscape character type within which it is located. Indirect and significant effects would extend to approximately 7 km within Landscape Character Type (LCT) 1 (ix) 'Central Wooded Estates' to the north and east, LCT 25 (ii) 'Deeside' to the south and LCT 11 (i) 'The Cromar Uplands' to the north-west and within approximately 10 km in LCT 22 (ii) 'The Mounth' to the south.

Designated Landscapes

4.8.31 There are no national landscape designations covering the site. The nearest national landscape designation is the Cairngorms National Park (CNP) situated approximately 16.8 km to the south-west.

4.8.32 The Proposed Development is not located within a locally designated landscape. The nearest locally designated landscape is the Dee Valley Special Landscape Area (SLA) located approximately 2.15 km to the south of the site.

4.8.33 As noted above, effects in relation to landscape designations is covered below in relation to NPF4 Policy 4.

Visual Effects

4.8.34 The LVIA addresses the likely visibility of the Proposed Development in detail in relation to key visual receptors, including:

> Residents, including views from isolated properties, scattered communities or defined settlements;

> Road users (including tourists); and

> Those engaged in recreational activities (e.g. walkers and cyclists).

4.8.35 In relation to visual effects, it is accepted that the Proposed Development would be visible from various nearby properties, settlements as well as parts of the surrounding road, footpath and cycle networks.

4.8.36 The LVIA includes a detailed assessment of visual effects from a series of predetermined Viewpoint locations. It has been assessed that there would be significant visual effects experienced at 16 of the 22 representative viewpoints during daylight hours and at 11 viewpoints during the hours of darkness.

4.8.37 These are as follows (daylight hours):

> Viewpoint 1 - B9119, junction with minor road to Midmar;

> Viewpoint 2 - B9119, Echt;

> Viewpoint 4 - A980, near Brockton;

> Viewpoint 5 - Torphins, Woodside Road;

> Viewpoint 6 - B993, near Hillend;

> Viewpoint 7 - Minor Road near Pitcullen;

> Viewpoint 8 - Minor Road near The Nuek;

> Viewpoint 10 - Meikle Tap;

> Viewpoint 11 - Barmekin Hill;

> Viewpoint 12 - Sauchen, Main Street;

> Viewpoint 13 – Benaquhallie;

> Viewpoint 14 - Tom's Cairn;

> Viewpoint 17 - Easter Beltie river restoration site ;

> Viewpoint 18 - Layby south of Pitmurchie House;

> Viewpoint 19 - Area of the Cowshed on A980; and

> Viewpoint 22 - Glassel Hall.

4.8.38 These are as follows (for hours of darkness):

> Viewpoint 2 - B9119, Echt;

> Viewpoint 5 - Torphins, Woodside Road;

> Viewpoint 6 - B993, near Hillend;

> Viewpoint 10 - Meikle Tap;

> Viewpoint 11 - Barmekin Hill;

- Viewpoint 12 - Sauchen, Main Street;
- Viewpoint 13 – Benaquhallie;
- Viewpoint 14 - Tom's Cairn;
- Viewpoint 17 - Easter Beltie river restoration site ;
- Viewpoint 18 - Layby south of Pitmurchie House; and
- Viewpoint 19 - Area of the Cowshed on A980.

4.8.39 The assessment of recreational routes found that receptors would experience significant effects from parts of: Core Path 616.01 – Torphins Wood Circular; Core Path 616.02 - Torphins: Cemetery Walk; Core Paths 405.02 - Myriewell Circular & Core Path 405.01 - Echt to North Kirkton Woods; Core Path 417.01 - Sauchen Farm to A944; Core Path 614.02 – Scolty Hill Path and Aberdeenshire Cycle Route - Midmar – Dunecht.

4.8.40 The assessment of roads found that receptors would experience significant effects from parts of: the A980; the B993; the B9119; and the B977.

The Effects of Aviation Lighting

4.8.41 The Civil Aviation Authority (CAA) requires that 'en-route obstacles' at or above 150 m above ground level are lit with visible lighting to assist their detection by aircraft.

4.8.42 Chapter 14 (Aviation & Other Issues) of the EIAR provides details of a reduced lighting scheme proposed for the turbines which was agreed with the CAA on 18 September 2023.

4.8.43 In addition, mitigation has been designed into the proposed aviation lighting to reduce the intensity of the 2,000 candela (cd) steady state lights in certain atmospheric conditions by reducing their intensity and attenuating the amount of vertical downwards lighting in order to reduce the visual impact experienced by receptors below the lights.

Cumulative Effects

4.8.44 Regarding cumulative effects, it is acknowledged in the LVIA that wherever more than one wind farm is visible at any given location in the landscape, there will be a greater overall or cumulative effect on landscape character than if just one wind farm was visible in the landscape. Likewise, it is acknowledged that the more wind turbines that are constructed in any given landscape, the greater the magnitude of overall (or combined) change to the landscape character.

4.8.45 In the first cumulative scenario considered (where other consented wind farms are also considered to be operational), there would be two additional onshore wind schemes, Fetteresso and Craigneill. It is not considered that the inclusion of these schemes within the baseline would result in any cumulative landscape or visual effects that would lead to a change to the effects in relation to the Proposed Development which are already set out in the LVIA.

4.8.46 With regard to the ‘Totality of the Combined Effects’ of all schemes, it is explained in the LVIA that the existing Mid Hill and Meikle Carewe onshore wind schemes are also both situated over 15 km from the site. Several other smaller scale schemes are already located in the landscape closer to the site and provide some existing views of wind energy in the landscape, albeit none of the schemes are of a scale such as the Proposed Development. Collectively therefore, it is set out in the assessment that the overall effects of all the schemes together would be no more than a minor degree greater than those identified in relation to the Proposed Development which are already set out in the main assessment.

4.8.47 It is important to acknowledge that localised significant effects on landscape character and visual amenity are inevitable as a result of commercial wind energy development and indeed Policy 11 makes this clear. Whilst the LVIA identified some significant landscape and visual effects it is considered that these are generally localised and that the landscape has the capacity to accommodate the effects identified, particularly when the consented but as yet unbuilt wind farms are taken into account.

Public Access

4.8.48 The LVIA has addressed visual amenity considerations in relation to public access and recreation. Whilst there would therefore be some visibility of the Proposed Development from some walking and recreational routes, these are not considered to be unacceptable.

4.8.49 Furthermore, no issues would arise in terms of any access route being obstructed either in the construction or operational period of the Proposed Development. The access tracks would be open for non-vehicular public access during the operational phase.

Aviation, Defence Interests and Telecommunications

4.8.50 Chapter 14 (Aviation and Other Issues) of the EIAR addresses aviation and radar matters. The assessment was undertaken in relation to the potential effects of the Proposed Development on existing and planned military and civil aviation activities, including those resulting from impacts to radar.

4.8.51 The assessment of potential effects on aviation, radar and defence considers technical acceptability, based on air navigation safety. The assessment states that the Proposed Development will potentially impact the Nats en Route Ltd (NERL) radar at Perwinnes. It has however been agreed with National Air Traffic Services (NATS) that the impact can be mitigated with a suitable mitigation scheme, and this could be secured through an appropriately worded suspensive planning condition.

4.8.52 Infrared lighting will be agreed with the Defence Infrastructure Organisation (DIO) for the Ministry of Defence (MOD) low flying requirements and a visible lighting scheme has been agreed with the CAA.

4.8.53 Through design mitigation, the Proposed Development has evolved to remove potential impacts upon NERL Allanshill radar and upon the Aberdeen Airport's 3,200 ft Surveillance Minimum Altitude Area (SMAA).

4.8.54 Prior to mitigation, it is considered that the Proposed Development would affect the operation of the NERL Perwinnes radar, low flying activities and Aberdeen Airport's Instrument Flight Procedure (IFP) for 2,800ft SMAA (the Proposed Development lies within the lateral buffer of the 2,800ft SMAA). The Proposed Development is within 50 km of Aberdeen Airport and has the potential to impact upon its Instrument Flight Procedures (IFP) and radar.

4.8.55 The Applicant has consulted Aberdeen Airport regarding the impact upon the 2800 ft SMAA. An increase to the IFP would mitigate this impact which requires agreement from Aberdeen Airport who would manage the change.

4.8.56 Whilst a working solution to the Aberdeen Airport's 2800ft SMAA is outstanding, consultation is ongoing and subject to agreement, a mitigation scheme could be secured through an appropriately worded suspensive planning condition.

4.8.57 The Proposed Development is not anticipated to have any effects on telecommunications infrastructure.

Impacts on Road Traffic and Trunk Roads

4.8.58 Chapter 11 (Traffic and Transport Assessment) of the EIAR addresses access, traffic and transport. As set out in the assessment, there are no significant impacts predicted and the Proposed Development is considered to be satisfactory in relation to this topic.

4.8.59 Whilst the Proposed Development would lead to a temporary increase in traffic volumes on the study area road network during the construction phase, traffic volumes would decrease considerably outside peak periods of construction. Overall, the construction period would be transitory in nature and all impacts would be short lived and temporary. Appropriate mitigation can be secured by way of a Construction Traffic Management Plan (CTMP).

Historic Environment

4.8.60 Chapter 7 (Cultural Heritage) of the EIAR considers the archaeological and historic environment value of the site and assesses the potential both for direct and setting effects on archaeological features and heritage assets resulting from the construction and operation of the Proposed Development.

4.8.61 The assessment deals with the potential for direct impact on heritage assets and, in particular, examines the potential effects in relation to the setting of heritage assets. Effects in relation to the historic environment are further examined below in terms of NPF4 Policy 7 (Historic Assets and Places).

Hydrology, the Water Environment and Flood Risk

4.8.62 Chapter 10 (Geology, Hydrology and Hydrogeology) of the EIAR assesses the potential impacts of the Proposed Development on geology, hydrogeology and peat. This includes potential impacts on surface watercourses, groundwater, water abstractions, designated receptors and flood risk within the local area. Potential impacts to peat, including peat slide risk, are also assessed.

4.8.63 The assessment sets out that a number of mitigation measures have been committed to in order to ensure the protection of peatland and watercourses. No significant potential effects on hydrological, geological and peat receptors have been predicted when taking account of mitigation by design and also embedded mitigation. As such, all residual effects on hydrological, geological and peat receptors are assessed as being not significant in EIA terms.

4.8.64 Mitigation measures will also be included within a Construction Environment Management Plan (CEMP) prior to the commencement of construction activities. These mitigation measures are considered to be robust and implementable and will reduce the potential impacts on peat resources, watercourses and groundwater. A Peat Management Plan (PMP) is also proposed. The CEMP and PMP would be secured by way of a planning condition.

Biodiversity

Ornithology

4.8.65 Chapter 9 (Ornithology) of the EIAR assesses the potential significant effects on important bird species associated with the construction, operation and decommissioning of the Proposed Development.

4.8.66 Overall, no significant adverse effects to the bird community associated with the site are expected during the construction, operational and decommissioning stages.

Ecology

4.8.67 Chapter 8 (Ecology) of the EIAR addresses ecology and the potential significant effects on important ecological interests associated with the construction, operation and decommissioning of the Proposed Development.

4.8.68 The assessment explains that following good practice and taking account of embedded mitigation, it is not predicted that there will be any significant adverse effects as a result of the construction phase of the Proposed Development. The CEMP would detail mitigation measures to be followed during construction. In addition, the presence of an Ecological Clerk of Works (ECoW) will ensure the necessary advice is given to ensure that the predicted effects would not worsen, resulting in any unexpected significant impact.

4.8.69 Overall, in terms of ecology, there is not expected to be any significant impacts to habitats or protected species as a result of the Proposed Development, providing that best practice and embedded mitigation is followed.

4.8.70 Proposed biodiversity enhancement measures are described below with regard to NPF4 Policy 3 (Biodiversity).

Balancing the Contribution of a Development and Conclusions on Policy 11

4.8.71 Part e(ii) of Policy 11 makes it clear and recognises that in terms of significant landscape and visual impacts, such impacts are to be expected for some forms of renewable energy. This is a very different starting point compared to the position in SPP and there is a very clear steer that significant effects are to be expected, and where localised and/or subject to design mitigation, they should generally be acceptable.

4.8.72 The Proposed Development is considered to be acceptable in relation to all of Policy 11's environmental and technical topic criteria.

4.8.73 The second last paragraph **of Paragraph e) of Policy 11** is expressly clear that in considering any identified impacts of developments, significant weight must be placed on the contribution of the proposal to renewable energy generation targets and greenhouse gas emissions reduction targets. In particular, the Policy recognises that landscape and visual impacts are to be expected but provided they are localised and / or appropriate design mitigation has been applied, they are likely to be considered acceptable.

4.8.74 The "contributions" are inextricably related to the scale of a proposed development and policy recognises that any identified impacts must be assessed in the context of these contributions.

4.8.75 In terms of contribution to targets, as a national development, the proposal's contributions have been set out in Chapter 3 above. The scale of the energy output and emissions savings are of national importance.

4.9 NPF4 Policy 3: Biodiversity

Policy 3 & Principles

4.9.1 In summary, there are no unacceptable effects arising in relation to biodiversity matters, nor in relation to nature conservation designations which NPF4 **Policies 3 and 4** (the latter in terms of designations – see below) respectively address.

4.9.2 **Policy 3** requires developments to, wherever feasible, provide nature-based solutions that have been integrated and made best use of and for significant biodiversity enhancements to be provided.

4.9.3 It should be noted that Policy 3 does not provide any guidance on how 'significant enhancements' will be measured and assessed, simply referring to "*best practice assessment methods*". In addition, in relation to the relevant wording in Policy 3, the Explanatory Report (as noted, issued alongside NPF4) states:

"*The Scottish Government have commissioned research to explore options for developing a biodiversity metric or other tool, specifically for use in Scotland. This work is at early stages, we will work with NatureScot on a programme of engagement with stakeholders as this work progresses*.

4.9.4 Therefore, exactly how enhancement is to be measured in the longer-term is to be the subject of further guidance, but a timescale for the production of this is at present unclear.

4.9.5 As per the Chief Planner Letter of 30 June 2023 this continues to be the position. The Scottish Government also issued a draft Biodiversity Strategy in December 2022 and a final draft in September 2023. However, it does not contain national biodiversity targets.

4.9.6 The letter from the Chief Planner issued on 08 February 2023 provides guidance on the application of new policy where specific supporting guidance / parameters for assessment are not yet available to aid assessments.

4.9.7 NPF4 Policy 3 Biodiversity is specifically recognised as one such policy area where final guidance is not yet available. The Chief Planner letter of February 2023 states:

"recognising that currently there is not single accepted methodology for calculating and / or measuring biodiversity 'enhancement' – we have commissioned research to explore options for development a biodiversity metric or other tool, specifically for use in Scotland. There will be some proposals which will not give rise for opportunities to contribute to the enhancement of biodiversity, and it will be for the decision maker to take into account the policies in NPF4 as a whole, together with material considerations in each case". (underlining added)

4.9.8 NatureScot Guidance was issued in Summer 2023 in support of NPF4 Policy 3 c). This states that the selection and design of enhancement measures will be a matter of judgment based on the circumstances of the individual case but should take into account a number of considerations. These considerations include:

- The location of the development site and the opportunities for enhancing biodiversity;
- The character and scale of development;
- The requirements and cost of maintenance and future management of the measures proposed;
- The distinctiveness and scale of the biodiversity damaged or lost; and
- The time required to deliver biodiversity benefits and any risks or uncertainty in achieving this.

The application of Policy 3

4.9.9 Notwithstanding the lack of policy guidance at the present time, in terms of environmental benefit, there will also be a permanent enhancement delivered through the Applicant's proposed enhancements to the natural habitat.

4.9.10 Technical Appendix 8.5 of the EIAR contains an Outline Biodiversity Enhancement and Management Plan (OBEMP). It details the proposed enhancement measures and aims of prescribed habitat measures looking to significantly improve the biodiversity associated with the site from the baseline conditions.

4.9.11 The OBEMP will be developed as an iterative document and would be implemented during the construction and operation phases that will focus on the enhancement and restoration of habitats including blanket bog within areas showing more severe signs of erosion and within reasonable distance of Proposed Development infrastructure.

4.9.12 The OBEMP outlines measures to be implemented to restore an area of up to approximately 51.03 ha of blanket bog, seeking to achieve a significant gain in habitat condition and biodiversity across what is currently heavily degraded and modified bog.

4.9.13 The approach to restoring areas of severe erosion and degraded conditions found within the site will involve actions such as blocking gullies and channels (using peat and/or heather dams), peat bunds and the facilitation of revegetation.

4.9.14 The proposed approaches have been proven to improve the quality of bog habitats and have been used by the NatureScot Peatland Action project on peat restoration programmes throughout Scotland, as well as being endorsed by the International Union for the Conservation of Nature (IUCN) as the publishers of the Conserving Bogs handbook.

4.9.15 The areas to be restored will be located adjacent to Proposed Development infrastructure to lessen the need for transportation of excavated peat across the site. The aims of the OBEMP are summarised as:

> Restoration methods that would encourage the abundance of bog-moss on areas of deeper peat (i.e. >0.5 m deep);

> Planting regimes, increase in deer management practices/cull rates and species lists for the purpose of tree planting to improve riparian habitats and slope stability;

> Timing schedules and target species for the manual removal and management of bracken and conifer self-seeded trees across the Site; and

> Detailing areas to implement heathland management practices, including heather swiping, and promotion of varied heathland age classes and structure.

4.9.16 Monitoring will also be implemented, to establish whether the objectives of the OBEMP are being achieved. The management of the site proposed is expected to have a positive impact on the overall condition of the site's habitats.

4.9.17 The proposals would therefore result in the site, from a biodiversity perspective, being in a "*demonstrably better state*" than without intervention, consistent with the provisions of Policy 3.

4.9.18 It is important to keep in mind that the greatest threat to biodiversity is climate change. The principal and essential benefit of the Proposed Development is a significant contribution of renewable energy, to facilitate the earliest possible decarbonisation of the energy system and the achievement of "net zero" no later than 2045, in accordance with the objectives of the Climate Change (Scotland) Act 2009 (as amended). The purpose of net zero is to protect biodiversity and the earlier it can be achieved, the greater the benefits to biodiversity.

4.10 NPF4 Policy 4: Natural Places

Policy 4 & Principles

4.10.1 **Policy 4**, **Paragraph c)** deals with national landscape designations and has a similar approach in relation to the former SPP in terms of how a proposal that affects a National Park or National Scenic Area (NSA) should be addressed.

4.10.2 Policy 4, Part c) states that:

"*Development proposals that will affect the National Park or National Scenic Area…will only be supported where:*

> *the objectives of designation and the overall integrity of the areas will not be compromised; or*

> *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*."

4.10.3 There would be no significant effects arising in relation to the CNP.

4.10.4 **Policy 4**, **Paragraph d)** deals with local landscape designations and contains a different policy approach to that which was contained within the former SPP. Policy 4, Paragraph d) is as follows:

"*Development proposals that affect a site designated as …a local landscape area in the LDP will only be supported where:*

> *i Development will not have significant adverse effects on the integrity of the area or the qualities for which it has been identified; or*

> *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*".

4.10.5 The policy now follows a similar construct to that which deals with national level designations. The first limb of the policy refers to significant effects on the "*integrity*" of the area or "*the qualities for which it has been identified*".

4.10.6 The policy set out in the second limb of NPF4 Policy 4, Paragraph d) provides that development proposals that affect a site designated as a local landscape area will only be supported where any significant adverse effects on the integrity of the area are clearly outweighed by social, environmental or economic benefits of at least local importance. It must be noted that:

> this is a new policy provision, reflecting the wider NPF4 policy that adverse effects (including adverse landscape and visual effects outside of a National Park or NSA) must be balanced against the benefits of a proposed development;

> the second limb is independent of the first ("or") and is to be applied where a decision-maker concludes that a proposed development will have significant adverse effects on the integrity of a local designation;

> NPF4, Policy 4, Paragraph d) now expressly includes a balancing mechanism ("*clearly outweighed by social, environmental or economic benefits*") and sets out the threshold to be used ("*of at least local importance*").

4.10.7 In considering this policy it is informative to note the Reporter's position in the Sanquhar II Supplementary Inquiry Report. In that case (paragraph 2.70 of the Report) the Reporter made reference to the impact of the proposed development in relation to a Local Landscape Area, which in that case was a Regional Scenic Area (RSA). The Reporter had concluded that the proposed development would not affect the integrity of the designation but would result and some significant adverse effects. The Reporter stated:

"*even if the opposite conclusion was reached and the integrity of the RSA was considered to be significantly adversely affected by this proposal, I consider part (d)(ii) of the policy would continue to give support to the development. This is because, in my view, a national development which by definition supports the delivery of the national spatial strategy, must offer benefits of more than local importance. Having regard to the benefits of the development in the round, as outlined in chapter six of my original Report, I am firmly of the view that this proposal is capable of support under policy 4(d)(ii).*"

4.10.8 The Dee Valley SLA is situated approximately 2.5 km to the south of the Proposed Development and covers an extensive swathe of the southern part of the detailed 20 km LVIA study area.

4.10.9 In terms of effects on the Dee Valley SLA, the assessment found that indirect significant effects on views north from the SLA would extend to approximately 7 km, but the addition of the Proposed Development would not undermine the understanding or appreciation of the underlying landscape of the SLA or its special qualities and there would not be an adverse effect on its integrity.

4.10.10 Policy 4 Paragraph g) also deals with Wild Land Areas and states that the effects of development outwith WLAs "*will not be a significant consideration*". There are no issues arising with regard to impacts on any Wild Land Areas.

The application of Policy 4

4.10.11 Given the above position in relation to landscape designations and Wild Land, it is considered that the Proposed Development is in accordance with Policy 4.

4.11 NPF4 Policy 5: Soils

Policy 5 & Principles

4.11.1 In terms of soils, **Policy 5** states that where development on peatland or carbon rich soils or priority peatland habitat is proposed, a detailed site-specific assessment is required to identify baseline, likely effects and net effects. The policy intent is to protect carbon rich soils, restore peatlands and minimise disturbance to soils from development. This is very similar to the policy position that was in SPP; however, a key difference is that renewable energy proposals are one of the types of development expressly envisaged to be acceptable in principle on peatlands (Paragraph c) reflecting the net benefits in carbon emissions and peatland restoration potential which can be gained.

The application of Policy 5

4.11.2 Chapter 10 (Geology, Hydrology, Hydrogeology) of the EIAR assesses the potential impacts of the Proposed Development on geology, hydrogeology and peat.

4.11.3 As explained above with regard to NPF4 Policy 11, the Applicant has proposed an appropriate approach to peatland resources going beyond mitigation and restoration and incorporating significant enhancement of peatland. Appropriate planning conditions can be attached to a grant of consent in relation to peatland and carbon rich soil matters. The Proposed Development is considered to be in accordance with Policy 5.

4.12 NPF4 Policy 6: Forestry, Woodland and Trees

Policy 6 & Principles

4.12.1 The policy intent is to protect and expand forests, woodland and trees. It states that development proposals that enhance, expand and improve woodland and tree cover will be supported.

4.12.2 **Policy 6 Paragraph b)** states that "*development proposals will not be supported where they will result in*:

"*i. Any loss of ancient woodlands, ancient and veteran trees, or adverse impact on their ecological condition;*

ii. Adverse impacts on native woodlands, hedgerow 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;

Iv. Conflict with Restocking Direction, Remedial Notice or Registered Notice to Comply issued by Scottish Forestry."

4.12.3 **Policy 6 Paragraph c)** states that:

"*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*".

The application of Policy 6

4.12.4 Chapter 14 (Aviation and Other Issues) of the EIAR address forestry matters.

4.12.5 The proposed turbines are sited on the Hill of Fare, an open heather moorland with sporadic self-seeded trees. The OBEMP, as referred to above, also includes proposals to control the spread of self-seeding trees to maintain the open heather moorland.

4.12.6 Surrounding the Hill of Fare are areas of commercial forestry however most of the site is unforested. The eastern section of the site, by the site entrance and central southern section at the Howe of Corrichie, are the only forestry areas within the site boundary.

4.12.7 It should be noted that the assessment identified that the eastern section of the site forms part of Midmar Forest and carries with it a designation of Ancient Woodland though has been managed for commercial forestry. However, since Storm Arwen tracked through the UK in November 2021, significant portions of forestry were blown down in Aberdeenshire including this eastern area within the site designated as Ancient Woodland.

4.12.8 The infrastructure proposed here is widening the existing tracks, upgrading the existing watercourse crossing, developing temporary BP, and temporary batching plant and the enabling works compound which will be kept permanently to improve public car parking.

4.12.9 The actual area of felling required overall is calculated to be 12.56 ha. The majority of felling is within the central southern section of the site where the BESS is proposed.

4.12.10 The Proposed Development has sought to minimise potential impact upon existing forestry on site. In order to comply with the criteria of the Scottish Government's Control of Woodland Removal Policy, compensatory planting will be required. The Applicant is committed to providing appropriate compensatory replanting.

4.12.11 A construction footprint of 27.02 ha is identified within areas assigned for forestry on the site. The OBEMP proposes 15.79 hectares of riparian planting within the site and an area up to 27.02 ha has been identified on Brown Hill for planting within the site. This can be used to plant the remaining deficit of 11.23 ha or, if required, planted further up to 27.02 ha. The total replanting of forestry is proposed up to 42.81 ha.

4.12.12 The extent, location and composition of such planting will be agreed with Dunecht Estates and Scottish Forestry and secured through a planning condition prior to the commencement of operation of the Proposed Development.

4.12.13 The Proposed Development is considered to be in accordance with Policy 6.

4.13 NPF4 Policy 7: Historic Assets and Places

Policy 7 & Principles

4.13.1 Finally, in terms of **Policy 7** which deals with Historic Assets and Places, the policy is very similar to that which was in SPP (paragraph 145).

4.13.2 The intent of the policy is to protect and enhance the historic environment, assets and places and to enable positive change. Key parts of the policy include the following:

- **Paragraph c)** states that "*development proposals affecting the setting of a Listed building should preserve its character, and its special architectural or historic interest*".
- **Paragraph d)** states that "*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*".
- **Paragraph h)** states that "*development proposals affecting Scheduled Monuments will only be supported where:*

  i) direct impact on the Scheduled Monument are avoided;
  ii) significant adverse impacts on the integrity of the setting of the Scheduled Monument are avoided; or
  iii) exceptional circumstances have been demonstrated to justify the impact on a Scheduled Monument and its setting and impact on the monument or its setting have been minimised.

- **Paragraph i)** states that "*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*".
- **Paragraph o)** states that "*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 impact*".

The application of Policy 7

4.13.3 The assessment set out in Chapter 7 (Cultural Heritage) of the EIAR has considered the presence of cultural heritage assets which may be affected by the Proposed Development. The potential effects on the identified assets, mitigation measures for protecting known heritage assets during construction, and the residual effect of the Proposed Development have all been considered.

4.13.4 The assessment identifies that the Proposed Development would have a moderate and significant effect on the setting of two Schedule Monuments: Barmekin of Echt Fort (SM57) and Sunhoney Stone Circle (SM44). These impacts are not considered to be of such significance that they would reduce the ability to understand or appreciate those assets, and the integrity of their settings would therefore not be adversely affected. As the integrity of both assets settings would be preserved, the Proposed Development is considered be in accordance with Paragraph h) of NPF4 Policy 7.

4.13.5 Alongside the embedded measures which have primarily focussed on diminishing the impact upon settings as far as possible which were incorporated into the design of the Proposed Development, it is also proposed to install a series of public enhancement measures in relation to both Monuments.

4.13.6 One of these measures would be the installation of an information board adjacent to the eastern entrance of Sunhoney to raise its profile and enhance public understanding and appreciation. Beyond this, it is also proposed to install a Cultural Heritage Trail in the area. At Sunhoney it is proposed to have signage at the entrance to Sunhoney Farm on the B9119 with parking availability and access via a trackway is also proposed; at present, there is little to indicate the presence of the asset to road users or local groups, and those who are aware of it will typically have only a narrow window of opportunity to view and appreciate it. It is envisaged that the entrance to the access track would include space for parking alongside a bespoke signage board that describes the asset in relatable terms, and places it within its broader landscape context.

4.13.7 In terms of Barmekin of Echt, Hill Fort, the installation of an information board adjacent to the eastern entrance to raise its profile and enhance public understanding and appreciation is proposed. At Barmekin of Echt it is proposed to have signage at the entrance to Upper Mains Farm on the B977 with parking availability and access via a trackway. At present there is little to indicate the presence of the asset to road users or local groups. Again, it is envisaged that the entrance to the access track would include space for parking alongside a bespoke signage board that describes the asset in relatable terms, and places it within its broader landscape context.

4.13.8 Alongside public access, it is explained in Chapter 7 of the EIAR that recent guidance from the Association of Local Government Archaeological Offices (ALGAO) encourages pathways into the archaeological profession. As such, an offsite erosion survey and mitigation strategy is proposed for the asset. This will monitor and mitigate erosion associated with an informal pathway noted to be eroding the southern slopes of the asset. This will be done utilising local University students and would therefore encourage experience within the profession.

4.13.9 It is set out in the EIAR that it is acknowledged that this approach in relation to both of these Scheduled Monuments would be considered an off-setting measure. These measures, in line with mitigation, have been used to reduce and minimise impact on the heritage assets.

4.13.10 It is explained in the EIAR that other potential measures include:

- Outreach to local communities in the form of presentation by industry leaders for furthering understanding of the history in the area.
- Excavation and publication of results of a potential longhouse on the site with local groups/Student Summer Schools in conjunction with Local Universities or Colleges. This would be subject to agreement with the Council.
- Renovation of the currently derelict 18th century lodge house on the site for visitor shelter and information.

4.13.11 It is considered that the measures set out for the Scheduled Monuments are an enhancement, addressing the lack of access to the Monuments including the ability to understand and appreciate their contributors to significance as well as a form of mitigation from the Proposed Development.

4.13.12 In summary, the Proposed Development would not unacceptably affect the fabric or setting of any Listed Buildings, or the integrity of the setting of any Scheduled Monuments. The Proposed Development is considered to be in accordance with Policy 7.

4.14 NPF4 Policy 33: Minerals

4.14.1 The intent of Policy 33 is to support the sustainable management of resources and minimise the impacts of extraction of minerals on communities and the environment.

4.14.2 Paragraph e) of the policy states "*Development proposals for borrow pits will only be supported where*:

i. *The proposal is tied to a specific project and is time limited;*
ii. *The proposal complies with the above mineral extraction criteria taking into account the temporary nature of the development; and*
iii. *Appropriate restoration proposals are enforceable*."

4.14.3 The mineral extraction criteria within the policy states that proposals for the sustainable extraction of minerals will only be supported where they will not result in significant adverse impacts on biodiversity, geodiversity and the natural environment with reference to sensitive habitats and the historic environment, as well as landscape and visual impacts.

4.14.4 It is considered that the Proposed Development would not result in any unacceptable effects arising in terms of the relevant extraction criteria and appropriate safeguards for the environment have been put forward which can be secured by way of suitable planning conditions.

4.15 Other NPF4 Policies

4.15.1 In relation to other NPF4 policies such as Policy 13 (Sustainable Transport), Policy 23 (Health & Safety) and Policy 25 (Community Wealth Benefits), it is considered that these policies are of very limited relevance and there would be no conflict with their provisions.

4.15.2 In relation to Policy 22 (Flood risk and water management) the intent of policy 22 is to strengthen resilience to flood risk and reducing the vulnerability of existing and proposed development to flooding. It is considered that there are no flood risk issues arising.

4.16 Conclusions on NPF4 Appraisal

4.16.1 The Proposed Development is considered to be acceptable in relation to all of Policy 11's environmental and technical topic criteria.

4.16.2 A key point within Policy 11 (Energy) is that any identified impacts have to be weighed against a development's specific contribution to meeting targets – which attracts significant positive weight in this case.

4.16.3 Significant weight is also afforded in relation to Policy 1 (Tackling the climate and nature crisis). This policy direction fundamentally alters the planning balance compared to the position that was set out in NPF3 and SPP.

4.16.4 The term "tackling" the respective crises in Policy 1 is also important – this means that decision makers should ensure an urgent and positive response to these issues and take positive action.

4.16.5 Overall, the Proposed Development, as a National Development, is considered to be one that would make a valuable contribution to the NPF4 Spatial Strategy and would help deliver a 'sustainable place'. Overall, it is considered that Proposed Development would accord with relevant policies of NPF4, and with NPF4 when read as a whole.

5. Appraisal against the Local Development Plan

5.1 Introduction

5.1.1 The other element of the statutory Development Plan covering the development site comprises the Aberdeenshire LDP (ALDP) adopted in January 2023.

5.1.2 The ADLP was prepared and adopted prior to NPF4 coming into force and reflects the provisions of NPF3 and SPP, both now superseded. Where conflicts or contradictions exists between the LDP and NPF4, or where LDP is silent, NPF4 takes precedence.

5.1.3 Relevant policies from the ALDP are referenced below. This Chapter does not present a detailed assessment of the Proposed Development as that has been covered in Chapter 4 above against the policy provisions of NPF4. An appraisal of key policy and consideration of areas of conflict or contradictions with NPF4 is provided.

5.2 The Lead ALDP Policy

5.2.1 Policy C2 'Renewable Energy' is the key or 'lead' ALDP policy for the assessment of the Proposed Development. The policy states:

"We will support renewable energy developments, including solar, wind, biomass (energy from biological material derived from living, or recently living organisms) and hydro-electricity projects, as well as energy storage projects, which are in appropriate sites and of the appropriate design. Assessment of the acceptability of such developments will take account of any effects on: socio-economic aspects; renewable energy targets; greenhouse gas emissions; communities, landscape and visual aspects; natural heritage; carbon rich soils; the historic environment; tourism and recreation; aviation, defence, telecommunications and broadcasting interests; road traffic; hydrology; and opportunities for energy storage. We treat biomass as industrial processes suitable for business land. These may be hazardous developments through their impact on air quality. This support is not at the expense of other policies regarding Natural Heritage, the Historic Environment and Protecting Resources".

5.2.2 The policy continues by providing more specific guidance on renewable energy technology types.

5.2.3 C2.9 provides that in all cases conditions, bonds or other Legal Agreements may be imposed to remove structures whenever the planning permission expires or the project ceases to operate for an agreed period of time.

5.2.4 The criteria in Policy C2 are all matters that are contained within NPF4 Policy 11 (Energy) (with the exception of tourism matters). These matters have all been addressed in the previous Chapter against NPF4 Policy 11.

5.3 Other relevant ALDP Policies

5.3.1 A summary of other relevant ALDP policies is provided in **Table 5.1**.

Table 5.1: Summary of LDP2 Policy relevant to the Proposed Development

ALDP Policy	Policy Summary	Comment re NPF4
Policy E1 Natural Heritage	Provides against development where it may have an unacceptable adverse effect on a nature conservation site designated for its biodiversity, species, habitat or geodiversity importance, except in specific circumstances as listed for applicable designations. In general terms impact must be clearly outweighed by the benefits of the proposals to the public. In all cases impacts should be minimised through careful design and mitigation measures. There is a strong presumption against removing ancient semi-nature woodland or Plantations or Ancient Woodland Sites (PAWS). Protected Species – development must seek to avoid any unacceptable detrimental impact on protected species. A protected species survey to inform the assessment of impacts will be required where there is a reason to believe protected species may exist on or adjacent to the site. Submission of Protected Species Protection Plans detailing appropriate avoidance and mitigation measures may be required. Development affecting protected species will only be permitted where it can be justified in accordance with the relevant protected species. Wider Biodiversity and Geodiversity A baseline ecological or geological survey for all developments where there is evidence to suggest that a habitat, geological feature or species of importance may exist on or adjacent to the site will be required. Proposals will only be approved when a baseline ecological survey has been carried out, when the development has been designed to avoid impacts where possible, where impacts cannot be avoided the public benefits clearly outweigh the ecological or geological value of the site, and, where ecological or geological management plan is provided that includes necessary mitigation and compensation measures to result in ecological net gain.	No conflict or contradiction.
Policy P1 Layout, Siting and Design (regarding biodiversity)	Provides guidance on the layout, siting and design of development, largely relating to built urban development and design review processes, masterplans and the application of design approaches that demonstrate the six qualities of successful place.	No conflict or contradiction.

ALDP Policy	Policy Summary	Comment re NPF4
	As regards biodiversity, the policy is relevant to all development and states that: All developments should identify measures that will be taken to enhance biodiversity (including woodlands) in proportion to the potential opportunities available and the scale of the development. In circumstances when it is not practical to deliver positive effects for biodiversity within a development site, it may be that off-site contributions towards biodiversity enhancement. Such measure may be secured by planning obligations or conditions.	
Policy E2 Landscape	Applications which cause unacceptable effects through scale, location or design on key characteristics, natural landscape elements, features or the composition or quality of the landscape character as defined in Landscape Character Assessments will not be supported. These impacts can be either alone or cumulatively with other recent developments. Appropriate mitigation should be identified, and a Landscape and Visual Impact Assessment (LVIA) may be required to assess the effects of change in some cases. Developments which have a significant adverse impact on the qualifying interests of a Special Landscape Area (SLA) will not be permitted unless it is adequately demonstrated that these effects are clearly outweighed by social, environmental or economic benefits of at least local importance.	The policy is largely consistent with NPF4 Policy 4 (Natural Places) however NPF4 provides explicit guidance on proposals that affect sites designated as a local landscape areas and stresses that impacts arising from a proposal would also need to be considered in the context of significant weight being placed on the contribution of the proposal, as per NPF4 Policy 11.
Policy E3 Forestry and Woodland	Protects forests and native and semi-natural woodland areas, and, where appropriate, they should be enhanced to safeguard the environment, habitats, species and local culture, whilst benefitting and supporting the local and national economy.	No conflict or contradiction.
Policy HE1 Protecting Listed Buildings, Scheduled Monuments and Archaeological Sites	Development which would have an adverse impact on the character, integrity or setting of listed buildings, or scheduled monuments, or other archaeological sites will be resisted. If adverse impact is unavoidable, it should be minimised and justified. Development which adversely effects these features will only be allowed if there are exceptional circumstances, including those of a social, or economic nature, and there is no alternative site.	The policy is broadly consistent with the provisions of NPF4, however, the policy approach set out within NPF4 Policy 7 (Historic Assets and Places) sets more specific development management tests.

ALDP Policy	Policy Summary	Comment re NPF4
Policy PR1 Protecting Important Resources	Development that has a negative effect on important environmental resources associated with air quality, the water environment, important mineral deposits, prime agricultural land, peat and other carbon rich soils, open space an important trees and woodland will not be approved. In all cases development which impacts on any of these features will only be permitted when public, economic or social benefits clearly outweigh any negative effects on the protected resource, and there are no reasonable alternative sites. Assessments may be required to demonstrate that the development has no significant adverse impact – e.g., Air Quality Assessments. Prime Agricultural Land is defined as class 1, 2 and 3.1 of the Land Capability survey. Land falling within this classification should not be developed unless it is essential, allocated in the LDP or an independent assessment of the site confirms a lesser quality of land. For clarity, time-limited proposals for renewable energy generation or mineral extraction may be acceptable on prime land providing the site will be restored and returned to its original status. Further guidance on issues such as peat and carbon rich soils, minerals, trees and woodland and open space is referenced within the Policy but is not relevant to the current proposals.	No conflict or contradiction.
Policy C4 Flooding	Flood Risk Assessments should be undertaken in accordance with SEPA Technical Flood Risk Guidance and will be required for development in the indicative medium to high category of flood risk of 0.5% or greater annual probability (1 in 200 years or more frequent). Approval will not be given for development that may contribute to flooding issues elsewhere. Sustainable Urban Drainage principles apply to all sites.	No conflict or contradiction.

5.3.2 It is considered that the Proposed Development would be in accordance with all of the other relevant policies in the ALDP as set out in **Table 5.1** above.

5.4 Conclusions on the LDP

5.4.1 The environmental and topic considerations within the ALDP policies are encompassed within the broad remit of NPF4 Policy 11 Part e). Each of the relevant development management considerations have been addressed above (Chapter 4) in the context of NPF4 Policy 11 and are not repeated.

5.4.2 It is considered that the effects arising from the Proposed Development would be acceptable in terms of the matters identified by Policy C2 and there is no conflict with any other relevant policies within the ALDP. It is therefore considered that the Proposed Development accords with the ALDP when it is read as whole.

5.4.3 The policy provisions of the ALDP are based on those of NPF3 and the former SPP. This means, as per the amendments made to the 1997 Act, that where there are any incompatibilities, the provisions of NPF4 will prevail.

5.4.4 Insofar as there are other relevant policies within the ALDP, these are considered to be generally consistent with those of NPF4 and given the appraisal set out above in Chapter 4, there would be no conflict with their terms.

6. Conclusions

6.1 The Electricity Act 1989

6.1.1 Paragraph 3 of Schedule 9 to the 1989 Act provides a specific statutory requirement on the Scottish Ministers to have regard to various matters when considering development proposals for consent under section 36 of the 1989 Act.

6.1.2 The information that is contained within the individual topic sections of the EIAR therefore enables Scottish Ministers to be satisfied that the obligations under Schedule 9 are met and that suitable mitigation has been identified. It is also considered that the detailed work undertaken in the formulation of the EIA overall has confirmed and provides confidence that the Proposed Development would be undertaken in an environmentally acceptable manner.

6.2 The Climate Crisis & Renewable Energy Policy Framework

6.2.1 The urgent need for onshore wind has been set out: a large increase in the deployment of this renewable energy technology is supported through a number of policy documents and by Scottish Government commitments – most recently expressed in the new OWPS and in NPF4.

6.2.2 Onshore wind was already viewed and described as "vital" to the attainment of targets in 2017. This imperative has only increased since a 'climate emergency' was declared by the Scottish First Minister in April 2019, in line with the recommendations made by the CCC (2019) 'net zero' publication[18]. Furthermore, the drive to attain net zero emissions is now legally binding at the UK and Scottish Government levels by way of amendments to the Climate Change Act 2008 and in Scotland through the provisions of the Climate Change (Scotland) Act 2009 and the Climate Change (Emissions Reduction Targets) (Scotland) Act 2019.

6.2.3 Achieving net zero is a legal requirement, and the Scottish Government has recognised, most recently in the new OWPS, that a very substantial quantity of new onshore wind is required to meet the legal emissions reduction requirement by 2030 – namely a minimum of 20 GW of operational capacity. Deployment of more onshore wind is described as being "*mission critical for meeting our climate targets*" in the OWPS.

6.2.4 The nationally important benefits of the Proposed Development have been set out in the context of the current climate emergency and they would help address the issue of global warming and very challenging 'net zero' targets and contribute to improving security of supply.

6.3 The Planning Balance

6.3.1 In NPF4 there is a clear recognition that climate change must become a primary guiding principle for all plans and decisions. Significant weight is to be given to the climate emergency and the contribution of individual developments to tackling climate change.

6.3.2 The revised OWPS was published in December 2022. NPF4 came into force on 13 February 2023. Both are up to date statements of Scottish Government policy, directly applicable to determination of this application. Both should be afforded very considerable weight in decision-making.

6.3.3 NPF4 and the OWPS are unambiguous as regards the policy imperative to combat climate change, the crucial role of further onshore wind in doing so, and the scale and urgency of onshore wind deployment required. As described in this Statement:

[18] CCC, Net Zero, The UK's contribution to stopping global warming (May, 2019).

- The global climate emergency and the nature crisis are the foundations for the NPF4 Spatial Strategy as a whole. The twin global climate and nature crises are "*at the heart of our vision for a future Scotland*" so that "*the decisions we make today will be in the long-term interest of our country*"[19]. The policy position, and the priority afforded to combatting the climate emergency, is different to that which was set out in NPF3 and SPP;
- NPF4 Policy 1 (Tackling the climate and nature crises) directs decision-makers to give significant weight to the global climate emergency in all decisions. This is a radical departure from the usual approach to policy and weight, and clearly denotes a step change in planning policy response to climate change. The matter of weight is no longer left entirely to the discretion of the decision maker; and
- Both NPF4 and the OWPS are clear that further onshore wind development, of scale and utilising modern, larger turbines, has a crucial role in combatting climate change, transitioning to a net zero Scotland and ensuring security of energy supply. NPF4 Policy 11 (Energy) strongly supports proposals for all forms of renewable, low-carbon and zero emissions technologies, including onshore wind farms.

6.3.4 It is important to fully recognise both the scale and urgency of the challenge set out in these documents, and the required response from decision-makers. NPF4 is clear that significant progress must be made by 2030 requiring, as set out in the OWPS, that "*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*"[20].

6.3.5 Publication of the OWPS followed and cross-refers to NPF4 and, for the first time, sets an onshore wind target: a Scottish Government ambition for a minimum of 20 GW of installed onshore wind capacity by 2030. New policy therefore supports an increase in the installed capacity of onshore wind in Scotland by a minimum amount equivalent to about 130% of the entire installed capacity of all current operational onshore wind farms in Scotland in a period of around 8 years. This is also embedded in the Scottish Government's consultative draft Energy Strategy and Just Transition Plan, together with the commitment to "***place the climate and nature at the centre of our planning system***"[21] (original emphasis) in line with the NPF4.

6.3.6 By any measure, the identified need for delivery of this additional capacity is a massive challenge requiring an urgent and positive response. As noted above, unless projects are in the planning system now, there is a high likelihood that they will not contribute to this ambition before 2030. The 'window' until the key date of 2030 for Scottish Government targets is also getting narrower.

6.3.7 This change in policy is also seen in the designation of individual renewable development applications as National Developments. National Developments are significant developments of national importance that will help to deliver the spatial strategy. As the Statement of Need for Strategic Renewable Electricity Generation and Transmission Infrastructure explains[22] "*A large and rapid increase in electricity generation from renewable sources will be essential for Scotland to meet its net zero emissions targets*."

[19] NPF4, page 2.
[20] OWPS 2022, paragraph 1.1.2.
[21] Energy Strategy and Just Transition Plan, page 55
[22] NPF4, page 103.

6.3.8 The recognition of National Development status relates to the attainment of Government renewable generation and emission reduction targets. Moreover, it relates to the importance of developing electricity supplies which are not dependent on volatile international markets and are located within the UK's national boundaries. The urgency for an electricity system which is self-reliant and not reliant on fossil fuels is now enormous, in order to protect consumers from high and volatile energy prices. Moreover, such a system would reduce opportunities for destructive geopolitical intrusion into national electricity supplies and this matter has grown in importance in recent months.

6.3.9 Other policy support for development of large-scale wind farms and the deployment of larger turbines is found in NPF4 and the OWPS:

> In addition to the cross-cutting NPF4 Policy 1, NPF Policy 11 (Energy) directs that in considering the identified impacts of an onshore wind proposal significant weight will be placed on the contribution of the proposal to renewable energy generation targets and on greenhouse gas emissions reduction targets;

> The OWPS expressly recognises that meeting the ambition of a minimum installed capacity of 20GW of onshore wind in Scotland by 2030 will require taller and more efficient turbines and that "*this will change the landscape*;

On this specific point it is relevant to take into account the Reporter's position on the target as referenced in the OWPS in the Meall Buidhe Appeal Decision Notice. The Reporter set out with regard to the OWPS at paragraph 87 of the Decision that:

"*It also provides some further supporting detail on increasing the installed capacity of onshore wind in Scotland by a minimum amount equivalent to about 130% of the entire installed capacity of all current operational wind farms in Scotland in the period of around 8 years. This is clearly a challenging target and there is an acceptance in the Policy Statement of the consequent change in the landscape. I find this further supports my conclusion above in terms of consistency with relevant provisions of NPF4. This policy statement does not form part of the Development Plan but is a material consideration in this case*."

> NPF4 Policy 11 confirms that significant landscape and visual impacts are to be expected for some forms of renewable energy. Scottish Government policy, which forms part of the Development Plan, is that where such impacts are localised and / or appropriate design mitigation has been applied, they will generally be considered to be acceptable. Notably, policy recognises that significant landscape and visual effects are inevitable and generally acceptable;

> NPF4 Policy 4 provides in principle support for wind farm development in all locations with the exception of National Parks and NSAs, unless the conditions in NPF4 Policy 4 c) are met;

> NPF4, Policy 4, Part d) specifically relates to a proposed development that may adversely affect the integrity of a local landscape designation. It provides that development will be supported where significant adverse effects on the integrity of the area are clearly outweighed by social, environmental or economic benefits of at least local importance.

6.3.10 The Applicant has gone to considerable lengths to ensure a satisfactory layout, design and composition for the Proposed Development. In short, appropriate design mitigation has been applied. Potentially significant adverse landscape and visual effects resulting from the proposal have been addressed through an iterative design process (i.e. 'mitigation by design') in which the number of turbines has reduced from first stage layouts and various other considerations have been taken into account.

6.3.11 NPF4 and the OWPS require that the decision-maker must also identify and weigh the adverse effects of a proposed development. The way that decision makers can recognise the strengthening policy imperative, and the increased weight given to the benefits of the proposed development, is by giving stronger weight in the planning balance to the seriousness and importance of energy policy related considerations and the contribution of the Proposed Development in meeting green energy targets.

6.3.12 It is considered that this approach is very clearly reflected and articulated in NPF4 and the OWPS (subject to Scottish Government policy now expressly stating that significant weight will be given to the global climate and nature crises and a proposed development's contribution towards meeting targets). Moreover, Section 3.6 of the OWPS states that the criteria for assessing proposals (in NPF4) have been updated "*including **stronger weight** being afforded to the contribution of the development to the climate emergency*".

6.3.13 In considering the change to policy which has been introduced by NPF4, the conclusions of the Reporter in his supplementary Inquiry Report in relation to the Sanquhar II development are informative. At paragraph 4.5 of the Report (Overall Conclusions) the Reporter stated:

"*in paragraph 8.50 of my original report I found that, at the time of writing "…I do not consider that at this present time there has been a tangible shift in policy of a scale or nature which would be capable of being pivotal…" having reviewed the terms of NPF and the OWPS, I now consider that a tangible shift in planning policy has been made at the national level. In my view it is likely that this shift may be sufficient to result in some wind farm proposals, which would previously have been refused under the former policy regime, to potentially now be granted consent*." (underlining added)

6.3.14 In the Clashindarroch II[23] Section 36 decision, the Reporter in the Supplementary IR with reference to the new policy position and with specific regard to 'changes to the balancing exercise' (paragraph 2.45) with reference to the OWPS stated that:

"*The new policy approach is clearly guiding decision makers towards supporting wind farm proposals that would make a meaningful contribution to the onshore wind target, unless those adverse effects were of such significance that they would override the imperative for more onshore wind capacity. The natural consequence of this approach must lead to changes in the scale or extent of adverse effects that the decision maker might now deem to be acceptable*." (underlining added)

6.3.15 In addition, the Reporter stated at paragraph 2.51:

"*The balancing exercise is integral to the OWPS, NPF4 and the draft Scottish Energy Strategy and Just Transition Plan 2023 but the heightened priority of tackling climate change as expressed in the national and UK energy policy context must inevitably increase the weight given to those matters. Particularly now when NPF4 directs the decision maker to give significant weight to these matters within Policies 1 and 11*." (underlining added)

6.3.16 Furthermore, the Reporter added at paragraph 2.90 that "*The new policy expects me to give less importance to such [landscape and visual] effects in unprotected areas*." (underlining added)

[23] Clashindarroch II, Section 36 Decision dated 26 June 2023, Supplementary Report of Inquiry dated 3 March 2023 (Case Reference WIN-110-2).

6.3.17 In the Shepherds Rig[24] Section 36 case, the Reporters in their original Inquiry Report considered that the adverse effects of that development were such that it was contrary to national planning policy and the Development Plan, and a position of objection was recommended to the Scottish Ministers. However, in the Supplementary Report of Inquiry which considered the implications of NPF4 and the OWPS, the Reporters changed their position. At paragraph 3.14 of the Supplementary Report the Reporters stated:

"*Taking into account all of the above, we recognise the urgent policy imperative in the OWPS and NPF to deliver additional installed wind farm capacity. These recently published policy statements demonstrate a significant strengthening of policy support for renewable energy development, to which the proposal would make an obvious contribution. In our original report, we found that the significant effects on the area's recreational resources should be given significant weight, to the extent that they outweighed the aims of delivering renewable energy. In the updated policy context, we find that the proposal's obvious contribution to renewable energy targets causes the benefits as a whole to now clearly outweigh the significant landscape and visual effects*."

6.3.18 The Reporter added at paragraph 3.4:

"*National policy has a clear expectation that more renewable proposals may be granted consent, focusing down on a tighter set of circumstances under which proposals would not be supported*."

6.3.19 It is accepted that each individual application needs to be considered on its respective merits, however it is evident from these recent Section 36 decisions, that the Reporters have recognised that there has been a material and tangible shift in planning policy support for onshore wind development and that this has clear implications for the planning balance and changes the calculus regarding the scale and extent of adverse effects which may now be found acceptable.

6.3.20 In this case, the Proposed Development is one of national importance that will help to deliver the National Spatial Strategy set out in NPF4. The Proposed Development would make a valuable and near-term contribution to help Scotland and the UK attain Net Zero, security of supply and related socio-economic objectives. It is submitted that very substantial weight should be given to this contribution when weighing the need for the Proposed Development and its identified effects within the planning balance.

6.3.21 The effects of the Proposed Development, including how relevant effects listed in NPF4 Policy 11 Paragraph (e) have been addressed, are detailed in the supporting information to the application. In terms of Policy 11, in considering the identified impacts of the proposal, significant weight must be placed on its nationally important contribution to renewable energy generation and greenhouse gas emissions reduction targets.

[24] Shepherd's Rig, Section 36 Decision dated 21 August 2023, Supplementary Report of Inquiry dated 2 March 2023 (Case Reference WIN-170-2005).

6.4 Overall Conclusion

6.4.1 The policy set out in NPF4 and the OWPS requires a rebalancing of the consenting of onshore wind developments in response to the challenges of tackling the climate and nature crises. Having regard to the weight to be ascribed to the important benefits of the Proposed Development, it is considered that the benefits that would result clearly outweigh its adverse effects.

6.4.2 The up-to-date policy set out in NPF4 and the OWPS and the policy being consulted upon in the draft Energy Strategy provide strong and increased support for the grant of consent.

6.4.3 The Proposed Development is an opportunity to deliver a nationally important renewable energy contribution, whilst additionally helping to balance electricity demand and supply and adding resilience to the wider energy system through the incorporation of co-located battery storage capability.

6.4.4 The conclusion is that the Proposed Development would be consistent with all relevant policies of the Development Plan, and with the Development Plan when read as a whole insofar as that is a relevant matter in a Section 36 application.

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Hill of Fare Wind Farm

Appendix

Socio-Economic Appraisal

Author	MKA Economics
Date	31st October 2023
Ref	Socio-economic Appraisal

Contents

Executive Summary

MKA Economics was commissioned by RES to assess the potential socio-economic impacts from the construction and operation of the Hill of Wind Farm (the Proposed Development).

The Proposed Development is located north of the A980 and approximately 6 km north of Banchory in Aberdeenshire. The site is within the administrative boundary of Aberdeenshire Council.

The Proposed Development will comprise sixteen turbines, and each turbine will have a generating capacity of approximately 6.6 MW, resulting in a total generating capacity of 105.6 MW.

Based on the average UK household electrical consumption of 3.5 MWh and a capacity factor of 38.59%[i], the Proposed Development could power around 101,000 homes.

In addition to directly contributing towards the net zero targets of the Scottish Government, the Proposed Development will diversify the economic base of Banchory and Mid Deeside. The creation of high skilled jobs, as those from onshore wind developments, remains key to offset the continued, and expected, fall in the working age population of Aberdeenshire.

The Proposed Development will generate a number of direct economic benefits through its construction and operation. It is estimated that the Proposed Development would generate up to:

- **237 construction jobs** and GVA of **£15.4 million in GVA** in Aberdeenshire; and
- **1,087 construction jobs** and GVA of **£61.7 million in GVA** in Scotland.

During its 50-year operational period the Proposed Development would generate up to:

- **25 operation and maintenance jobs** and **GVA of £1.7 million** in Aberdeenshire; and
- **63 operation and maintenance jobs** and **GVA of £2.9 million** in Scotland.

As a developer RES will maximise local economic impacts through its procurement and, where possible, will seek to favour local contractors, and will achieve this through 'Meet the Buyer' events.

Throughout the operation of the Proposed Development, RES is committed to providing a package of community benefits. RES is committed to offering **£5,000 per MW** per year of maximum useable capacity in a community investment fund. The annual funding of around **£528k** (**£26.4 million over the lifetime of the Proposed Development**) will be used to maximise the aspirations and needs of those communities located close to the Proposed Development.

In addition, RES will offer the local communities the opportunity to take up to **10% shared ownership** in the Proposed Development. RES has also developed a community estate masterplan with Dunecht Estates, which sets out a wide range of recreational and community enhancement for the local area as a direct result of the Proposed Development.

The Proposed Development will also contribute towards public finances through the payment of **£1 million in non-domestic rates each year**. These will support the provision of public services across Aberdeenshire.

On this basis, it can be concluded that the Proposed Development maximises net economic impact.

Introduction

1.1 Introduction

MKA Economics was commissioned by RES to assess the potential socio-economic impacts from the construction and operation of the Hill of Wind Farm (the Proposed Development).

1.2 Proposed Development

The Proposed Development is located north of the A980 and approximately 6 km north of Banchory in Aberdeenshire. The site is within the administrative boundary of Aberdeenshire Council.

The Proposed Development will comprise sixteen turbines, with varying heights to blade tip as follows:

- eleven turbines up to 180 m in height to blade tip; and
- five turbines up to 200 m in height to blade tip.

Each turbine will have a generating capacity of approximately 6.6 MW, resulting in a total generating capacity of 105.6 MW.

Based on the average UK household electrical consumption of 3.5 MWh and a load factor of 38.39%[ii], the Proposed Development could power around 101,000 homes.

RES

RES is the world's largest independent renewable energy company active in onshore and offshore wind, solar, energy storage, green hydrogen, transmission and distribution. At the forefront of the industry for over 40 years, RES has delivered more than 23 GW of renewable energy projects across the globe and supports an operational asset portfolio of 12 GW worldwide for a large client base. RES employs more than 2,500 people and is active in 14 countries.

From its Glasgow office RES has been developing, constructing and operating wind farms in Scotland since 1993.

RES has developed and/or built twenty-one wind farms in Scotland with a total generation capacity of 597 MW. The Applicant has the necessary knowledge and experience in renewable energy to develop the Proposed Development.

1.3 Report structure

The remainder of the report is structured as follows:

- section 2 places the Proposed Development in the context of national, regional, and local economic strategies and policies;
- section 3 considers the socio-economic baseline where the Proposed Development is located;
- section 4 considers the economic impact from the construction and operation of the Proposed Development;
- section 5 outlines the wider economic effects and community investments effects, associated with the Proposed Development on the regional economy; and
- section 6 considers the net economic benefits from the Proposed Development.

Strategic Economic Context

1.4 Introduction

This section considers national, regional, and local strategies and how the Proposed Development supports their delivery. It should be noted that this strategic context focuses on the economic development aspects of planning and economic policies, and in part is covered by the Planning Statement. More detail on the strategic fit is presented in the EIAR Chapter.

1.5 National Strategic Context

National Performance Framework

The Proposed Development will support the decarbonisation of the Scottish economy, while creating high-skilled jobs and supporting the ambitions of local communities. Through these channels, the Proposed Development will make positive contributions towards the economy and communities in achieving the National Performance national outcomes.

National Planning Framework 4 (NPF4)

NPF4 is founded on sustainable economic growth principles and is guided by the National Strategy for Economic Transformation which confirms that the planning system should proactively support development that contributes to sustainable economic growth and to create sustainable places.

In the context of energy generation, Policy 11 is relevant to the socio-economic impact of the Proposed Development. Paragraph (c) states that:

"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."

Scotland's National Strategy for Economic Transformation

Overall, it can be clearly demonstrated that the purpose of the Proposed Development reflects the vision and strategic approach of Scotland's National Strategy for Economic Transformation.

The NSET also considers evidence collected by engaging with the country's Regional Economic Partnerships. It notes that the North East region presents opportunities in the renewables sector and to create a globally integrated energy hub focused on net zero. The Proposed Development will contribute towards the delivery of this ambition.

Onshore Wind Policy Statement 2022

The Proposed Development directly supports the Onshore Wind Policy Statement, and can play an important role in achieving or surpassing the targets for installed onshore wind capacity by 2030 and beyond.

Quantifying the Economic Benefits of Onshore Wind to the UK

The Proposed Development will have a range of economic impacts, in terms of jobs and resultant GVA effects, at construction and operation stages and will support the significant economic opportunities afforded by onshore wind.

Onshore Wind Vision and Sector Deal for Scotland

The timing of the new sector deal can assist the delivery of the Proposed Development, by showing how it can support the new NPF4, and also benefit from a streamlined planning process.

Just Transition

Specifically related to renewable energy, the vision for a fairer, greener 2045 includes all energy needs being met by renewable sources and the Proposed Development squarely supports this policy directive.

Scottish Government Good Practice Principles for Community Benefit of Onshore Renewable Development

In accordance with the Good Practice Principles for Community Benefits, the Applicant will contribute £5,000 per MW of installed capacity of the wind turbines to a 'Community of Interest for Community Benefit', i.e., those Community Council areas defined following consultation which will receive community benefit funding from the Proposed Development.

These areas will generally be either directly affected by the Proposed Development (the Site lies within the area) or are immediately adjacent to such areas and may be indirectly affected by the Proposed Development, particularly during construction.

Aberdeen City and Shire Economic Strategy

The construction and operation of the Proposed Development will support the Plan by increasing investment in the region, providing high-skilled jobs with the potential to retain activity locally and contributing to the transition to net-zero.

1.6 Summary

The Proposed Development will have various socio-economic benefits in line with national, regional, and local strategic policy documents. Through its generation of renewable energy, the project will contribute to the decarbonisation of the Scottish economy and towards Scotland's net-zero target. The Proposed Development will also deliver on some of the issues covered by Scotland's NPF, including the economy, communities, and the environment.

At regional and local level, the project will play a role in supporting employment. It will improve employment opportunities and facilitate retention of people of working age within Aberdeenshire. The Proposed Development will also contribute to the diversification of economic activity within Aberdeenshire and make its business base more resilient to future shocks. In the short-term, RES's investment in the local community will fund local needs and aspirations.

This includes the importance of the sustainable tourism sector working with the renewable energy sector, as two key sectors in Scotland, and for tourism to play a role in supporting the transition to net zero.

Local Economic Baseline

1.7 Introduction

This section considers the socio-economic context for the Proposed Development. A desk-based review of publicly available information has been undertaken to identify the key characteristics of the local economy.

1.8 Population

The Aberdeenshire Council area has a population of over 262,700 residents and witnessed an increase of 3.5% over the period 2011 to 2021 – compared to 3.4% increase at the Scottish level and an 5.9% rise at the national (Great Britain) level. The area has witnessed a population increasing at a similar rate to the Scottish level, and slower than the Great Britan (GB) increases. Aberdeenshire population is projected to grow by 2.4% over the period to 2043, compared to 2.5% across Scotland.

Table 3.1: Population (2021)

	Aberdeenshire (Numbers)	Scotland (Numbers)	Great Britain (Numbers)
All People	262,700	5,479,900	65,121,700
Males	130,500	2,672,600	31,874,600
Females	132,200	2,807,300	33,247,100

Source: ONS Population Estimates

In terms of the working age population, 61.1% of the regional population is of working age, compared to 63.8% and 62.9% at the Scottish and GB levels respectively. This indicates that the area has a lower proportion of people of working age, which can be seen to be an economic challenge in terms of securing future economic prosperity. In terms of working age population projections, Aberdeenshire is projected to see a decreased of 1.7% over the period to 2043, compared to 0.2% nationally.

Table 3.2: Employment and Unemployment (2021)

	Aberdeenshire (Numbers)	Aberdeenshire (%)	Scotland (%)	Great Britain (%)
All People Aged 16-64	160,500	61.1	63.8	62.9
Males Aged 16-64	80,500	61.7	64.4	63.3
Females Aged 16-64	80,000	60.5	63.2	62.6

Source: ONS Population Estimates

1.9 Economic Activity

Table 3.3 below highlights that Aberdeenshire has a higher proportion of working age people who are economically active, when compared to the Scottish and GB levels. The regional area also has a higher proportion of self-employed people than recorded at the Scottish level.

Table 3.3: Population aged 16 – 64 (April 2022 – March 2023)

	Aberdeenshire (Numbers)	Aberdeenshire (%)	Scotland (%)	Great Britain (%)
All People				
Economically Active	151,200	84.1	77.4	78.4
In Employment	146,200	81.2	74.7	75.5
Employees	127,500	71.8	67.3	66.0
Self Employed	17,700	8.9	7.1	9.2
Unemployed (Model-Based)	3,500	2.4	3.5	3.6

Source: ONS Annual Population Survey

This suggests that although the region has fewer people of working age, those who are of working age are more economically active than recorded nationally and at the GB level. This is an economic strength and one which can help secure future economic wealth. A more detailed assessment of unemployment is set out later in this section.

1.10 Economic Inactivity

Corollary to higher economic activity rates Aberdeenshire has a lower rate of economic inactivity, as shown below.

Table 3.4: Economic Inactivity (April 2022 – March 2023)

	Aberdeenshire (Level)	Aberdeenshire (%)	Scotland (%)	Great Britain (%)
All People				
Total	27,300	15.9	22.6	21.6
Student	N/A	N/A	24.2	26.3
Looking After Family/Home	5,300	19.6	16.8	19.7
Temporary Sick	N/A	N/A	3.1	2.3
Long-Term Sick	6,900	25.1	31.1	26.5
Discouraged	N/A	N/A	N/A	0.3
Retired	7,800	28.7	14.2	13.3
Other	N/A	N/A	10.3	11.6
Wants A Job	6,600	24.1	19.9	18.0
Does Not Want A Job	20,700	75.9	80.1	82.0

Source: ONS Annual Population Survey

It is worth noting that of those economically inactive, the region has a higher proportion of people who 'want a job' (24.1%) compared to the Scottish (19.9%) and GB (18.0%) levels. This suggests there is more of a desire to find work in Aberdeenshire than recorded nationally.

Workless Households

In terms of worklessness, there are fewer households in the region, compared to the Scottish level, that are workless households. However, the rate is slightly higher than the GB rate.

Table 3.5: Workless Households (January 2021 – December 2021)

	Aberdeenshire	Scotland	Great Britain
Number Of Workless Households	9,800	329,200	2,866,800
Percentage Of Households That Are Workless	12.8	18.6	14.0
Number Of Children In Workless Households	N/A	102,400	1,249,200
% Of Children Who Are In Households That Are Workless	N/A	12.0	10.2

Source: ONS Annual Population Survey

1.11 Claimant Count Unemployment

The latest claimant count unemployment rate highlights that the region has a lower rate than the Scottish and GB rates.

Table 3.6: Claimant Count by Sex (August 2023)

	Aberdeenshire (Numbers)	Aberdeenshire (%)	Scotland (%)	Great Britain (%)
All People	2,970	1.9	3.2	3.7
Males	1,660	2.1	3.8	4.2
Females	1,315	1.6	2.5	3.2

Source: Claimant Count

Although regional unemployment is below the national unemployment rate, regional unemployment has remained stable at 1.9% since July 2022, following a period of falling unemployment from around 4% at the height of the pandemic. This mirrors the Scottish and GB position, where unemployment has fallen to historically low levels, however, there have been no further falls, and a view that unemployment may now start to rise as a result of the ongoing cost of living crisis.

At a more local level, Banchory and Mid Deeside, the unemployment rate is even lower at 1.4% (August 2023), with only 90 people out of work and claiming benefits. This figure has fallen from a high of 3.2% in August and 200 claimants in August 2020, at the height of the Covid-19 pandemic.

In terms of unemployment by age range, the regional position is better than the Scottish situations across all age ranges.

Table 3.7: Claimant Count by Age (August 2023)

	Aberdeenshire (Level)	Aberdeenshire (%)	Scotland (%)	Great Britain (%)
Aged 16+	2,970	1.9	3.2	3.7
Aged 16 To 17	20	0.3	0.6	0.2
Aged 18 To 24	560	3.3	4.5	4.9
Aged 18 To 21	330	3.4	4.9	5.0
Aged 25 To 49	1,630	2.0	3.6	4.2
Aged 50+	755	1.3	2.1	2.7

Source: Claimant Count

In terms of benefit claimants by type, the area has a lower rate of claimants across all types of economic inactivity claimants.

Table 3.8: Economic Inactivity (2016)

	Aberdeenshire (Numbers)	Aberdeenshire (%)	Scotland (%)	Great Britain (%)
Total Claimants	12,850	7.8	13.0	11.0
By Statistical Group				
Job Seekers	1,700	1.0	1.4	1.1
ESA And Incapacity Benefits	7,040	4.3	7.8	6.1
Lone Parents	780	0.5	0.9	1.0
Carers	1,590	1.0	1.7	1.7
Others On Income Related Benefits	160	0.1	0.2	0.2
Disabled	1,200	0.7	0.9	0.8
Bereaved	370	0.2	0.2	0.2
Main Out-Of-Work Benefits†	9,680	5.8	10.2	8.4

Source: DWP benefit claimants - working age client group

Overall, in terms of 'main out of work benefits' Aberdeenshire has a lower proportion of claimant than recorded at the Scottish and GB levels.

Employment by Occupation

Table 3.9 highlights the type of employment at the Aberdeenshire, Scottish and GB levels. It indicates that the region has a higher proportion of managerial, administrative, skilled trades and plant and machine operative occupations than the Scottish and GB levels.

Table 3.9: Employment by Occupation

	Aberdeenshire (Numbers)	Aberdeenshire (%)	Scotland (%)	Great Britain (%)
Soc 2020 Major Group 1-3	62,700	43.1	49.1	51.5
1 Managers, Directors And Senior Officials	12,500	8.5	8.2	10.8
2 Professional Occupations	32,400	22.2	25.6	26.3
3 Associate Professional Occupations	17,800	12.2	15.1	14.2
Soc 2020 Major Group 4-5	39,000	26.8	18.7	18.6
4 Administrative & Secretarial Occupations	17,800	12.2	9.1	9.6
5 Skilled Trades Occupations	21,100	14.4	9.5	9.0
Soc 2020 Major Group 6-7	21,700	14.9	16.0	14.4
6 Caring, Leisure And Other Service Occupations	11,400	7.8	8.5	8.1
7 Sales And Customer Service Occs	10,300	7.1	7.5	6.3
Soc 2020 Major Group 8-9	22,000	15.2	16.1	15.4
8 Process Plant & Machine Operatives	9,200	6.3	5.1	5.8
9 Elementary Occupations	12,800	8.8	10.9	9.6

Source: ONS Annual Population Survey

Regionally there are fewer people employed in professional, associate professional, technical, care, leisure and service occupations and elementary occupations.

1.12 Jobs

The region has a lower proportion of full-time jobs and more part-time jobs than the GB level.

In terms of industry of employment, Aberdeenshire has higher rates of mining, manufacturing, construction, wholesale and retail trade, professional and scientific and education jobs than recorded at the national levels.

The construction sector is well represented at the Aberdeenshire level, suggesting the local area is well positioned to benefit from aspects of the Proposed Development, as shown in Table 3.10 below.

Table 3.10: Employee Jobs (2021)

	Aberdeenshire (Employee Jobs)	Aberdeenshire (%)	Scotland (%)	Great Britain (%)
Total Employee Jobs	100,000	-	-	-
Full-Time	66,000	66.0	66.4	68.1
Part-Time	33,000	33.0	33.6	31.9
Employee Jobs By Industry				
B : Mining And Quarrying	3,500	3.5	1.0	0.1
C : Manufacturing	13,000	13.0	7.1	7.6
D : Electricity, Gas, Steam And Air Conditioning Supply	600	0.6	0.7	0.4
E : Water Supply; Sewerage, Waste Management And Remediation Activities	800	0.8	0.8	0.7
F : Construction	9,000	9.0	6.1	4.9
G : Wholesale And Retail Trade; Repair Of Motor Vehicles And Motorcycles	15,000	15.0	14.4	14.4
H : Transportation And Storage	4,000	4.0	4.2	5.1
I : Accommodation And Food Service Activities	6,000	6.0	7.6	7.5
J : Information And Communication	1,500	1.5	3.1	4.5
K : Financial And Insurance Activities	600	0.6	3.1	3.6
L : Real Estate Activities	1,000	1.0	1.5	1.8
M : Professional, Scientific And Technical Activities	10,000	10.0	6.5	8.9
N : Administrative And Support Service Activities	5,000	5.0	8.0	8.9
O : Public Administration And Defence; Compulsory Social Security	3,500	3.5	6.6	4.6
P : Education	9,000	9.0	8.7	8.8
Q : Human Health And Social Work Activities	10,000	10.0	15.9	13.7
R : Arts, Entertainment And Recreation	2,250	2.2	2.5	2.3
S : Other Service Activities	1,500	1.5	1.8	1.9

Source: ONS Business Register and Employment Survey

The region has a lower proportion of transportation, accommodation and food service, Information and Communications Technology, financial services, real estate, administrative, health, arts and entertainment and other service sector jobs than the national level. The manufacturing sector is well represented which may support the region's ability to benefit from the Proposed Development.

1.13 Businesses

In terms of the business base, Aberdeenshire has a higher proportion of micro enterprise and smaller business units (in terms of employment numbers) than witnessed at the national (Scottish) level. The incidence of larger businesses is lower at the regional level than recorded nationally as shown in Table 3.11.

Table 3.11: Business Count (2022)

	Aberdeenshire (Numbers)	Aberdeenshire (%)	Scotland (Numbers)	Scotland (%)
Enterprises				
Micro (0 To 9)	11,895	90.8	152,470	87.8
Small (10 To 49)	1,035	7.9	17,775	10.2
Medium (50 To 249)	140	1.1	2,730	1.6
Large (250+)	25	0.2	675	0.4
Total	13,100	-	173,655	-
Local Units				
Micro (0 To 9)	12,910	86.4	177,455	81.2
Small (10 To 49)	1,740	11.6	33,375	15.3
Medium (50 To 249)	270	1.8	6,580	3.0
Large (250+)	30	0.2	1,060	0.5
Total	14,950	-	218,470	-

Source: Inter Departmental Business Register

1.14 Earnings

In terms of earnings, both weekly wages and hourly pay, the region has higher rates than those achieved at the Scottish and GB levels as presented in Table 3.12.

Table 3.12: Earnings (2022)

	Aberdeenshire (Pounds)	Scotland (Pounds)	Great Britain (Pounds)
Gross Weekly Pay			
Full-Time Workers	709.4	640.3	642.2
Male Full-Time Workers	744.8	675.1	687.5
Female Full-Time Workers	652.8	604.7	584.5
Hourly Pay - Excluding Overtime			
Full-Time Workers	16.71	16.59	16.37
Male Full-Time Workers	16.28	16.91	16.97
Female Full-Time Workers	16.71	16.29	15.49

Source: ONS Annual Survey of Hours and Earnings - Resident Analysis

1.15 Deprivation

The Scottish Index of Multiple Deprivation (SIMD)[iii] is a standard tool for identifying areas with relatively high levels of deprivation across Scotland. SIMD 2020 is the Scottish Government's sixth edition since 2004.

There are 340 data zones in Aberdeenshire, representing 4.9% of the 6,976 data zones in Scotland. Within the context of the 32 Scottish Local Authorities Aberdeenshire has no data zones ranked within the 5% most deprived.

The lowest ranking Aberdeenshire data zone is ranked at position 569, within the 10% most deprived in Scotland, and is found in Fraserburgh (Fraserburgh Harbour and Broadsea). Aberdeenshire has nine data zones within the 20% most deprived in Scotland, representing just 0.6% of the national share. All nine of these zones can be found in Fraserburgh and Peterhead.

29% of Aberdeenshire's datazones fall into the 20% least deprived in Scotland. These can be found across several of Aberdeenshire's settlements however also including Fraserburgh and Peterhead. This highlights that while areas within settlements can be considered deprived it does not mean the entire settlement is. Twenty-two of these data zones are considered in the 5% least deprived in Scotland.

Aberdeenshire's highest ranking data zone can be found in Stonehaven and is ranked at position 6,959 out of 6,976. In a local setting, there are no deprived wards in the vicinity of the Proposed Development and the area is on of relatively least deprived, and more affluent, areas of Scotland.

1.16 Summary

Aberdeenshire is a prosperous regional economy, however, it has not witnessed the population increases that have been achieved at the national level. Similarly, it has a lower proportion of working age residents, and an ageing population. The local area is expected to witness a reduction in the proportion of working age residents over the period to 2043, which is a further challenge to securing the future economic prosperity of the area. It also has more people who want a job than the same figures at the Scottish and national levels. The transition from fossil fuels to renewable energy is a regional priority and this can help younger people find work in this growth sector.

While Banchory and Mid Deeside has lower unemployment levels and is less deprived than Scotland as a whole, economic activity is concentrated in a few sectors, including manufacturing and mining/quarrying, which employs a lot more locally than the national levels. These are areas which will benefit from the Proposed Development, and there are a number of local contractors in these areas which are likely to benefit from the Proposed Development. The wider local authority is also reliant, though to a lesser extent, on businesses associated with the tourism industry, as accommodation and food services accounts for 6% of all employment.

Expansion of the onshore wind sector in the area could provide an opportunity for a diversification of its economic base. In addition, the sector could contribute to the retention of working aged, and young people in the area and partly offset existing depopulation trends by supporting high skilled and high paying jobs.

Aberdeenshire, and wider Grampian, is a popular tourism destination, but Aberdeenshire is not one of Scotland's key destinations. Secondary research provides evidence that tourists are not dissuaded from an area, or revisiting an areas, with wind farms. The area does have some popular attraction, notably Crathes Castle and Castle Fraser, however these are both more than 10 miles from the Proposed Development.

In addition to considering any potential implications on tourism and recreation from the Proposed Development, RES is committed to enhance existing conditions. As part of the planning submission, RES has developed a community investment masterplan. Among other issues, this document considers ideas for recreational investments on site that could be used by visitors and local people. This has been completed in line with responses obtained as part of the consultation programme.

Economic Impacts

1.17 Introduction

This section estimates the economic impact from the construction and operation of the Proposed Development.

This section is split into two subsections: Construction and Operational and effects.

The analysis of the potential economic benefits from the construction and development of the Proposed Development was based on an industry best-practice approach. In particular, it drew on the evidence from two studies conducted RenewableUK in 2012[iv] and 2015[v], which assessed the local, regional, and national economic benefits from wind farms developed across the UK.

1.18 Construction Effects

Each turbine will have a generating capacity of approximately 6.6 MW, resulting in a total generating capacity of 105.6 MW.

Table 4.1 below shows the geographical and contract type distributions of investment into capital expenditure (CAPEX) during the construction phase. In total, it is estimated that approximately £117 million could be invested into the Proposed Development in CAPEX by the Applicant.

This conservative figure has been supplied by the Applicant. However, research completed by RenewableUK into the economic benefits of onshore wind, assumed £1.32m per MW constructed, assuming the total installed capacity is 105.6 MW, which provides a figure of £140 million. For the purposes of this assessment, the assessment has utilised the figure supplied by the Applicant as a worst case scenario (£117 million). Other proxies in regard to the spatial location of impacts and the breakdown of this expenditure are based on the RenewableUK evidence.

The construction period is expected to last 24 months, and as such impacts are measured across this time period.

Table 4.1: Construction Phase – Estimated Capital Expenditure (CAPEX)

Geographical Distributions		
	%	£million
Aberdeenshire	12.0%	14.04
Scotland	36.0%	42.12
Non-Scotland	52.0%	60.84
Total	100%	117.00
Contract Type Distributions		
	%	£million
Turbine Purchase	64.4%	75.35
Balance of Plant	28.6%	33.46
Grid Connection	7.0%	8.19
Total	100.00%	117.00

It is estimated that around a third of investment into capital expenditure will occur within Scotland (£42.12 million) as a whole, with a third of that figure accruing to Aberdeenshire (£14.04 million).

The main expenditure during the construction phase is expected to be turbine purchase, with balance of plant (construction works) and grid connection making up a smaller proportion. Each of these are considered in the economic assessment, although it is noted that the grid connection will be a separate consent.

Combining these two different measures of distribution of CAPEX, it can be expected that a smaller level of investment overall will accrue to Aberdeenshire and Scotland. This exact amount however cannot be calculated. The rest of the CAPEX will accrue to the UK and international levels.

The CAPEX will produce direct socio-economic benefits to the Aberdeenshire local authority area and Scotland in terms of employment and GVA. Table 4.2 shows the predicted direct impacts for both regions. It must be noted that these two amounts cannot be summed, as the direct impacts within Aberdeenshire will form a part of the direct impacts within the whole of Scotland.

Employment impacts are shown in job years during the construction phase so as to better illustrate the impact during the relatively short phase of construction relative to operations and maintenance. One job year equals one year of continuous employment.

The contract values potentially awarded in each area would represent an increase in turnover in businesses in these areas. The Gross Value Added (GVA) impact, a measure of economic activity, was estimated using industry-specific data from the Scottish Annual Business Survey[vi], which gives the turnover to GVA ratio for each of the industries involved.

Similarly, the contract values potentially awarded in each area would support employment. Turnover per employee for each of the industries involved is also given by the Scottish Annual Business Survey, which can be used to estimate the employment impact from any increase in turnover.

These impacts do not measure the effects created throughout the entirety of the supply chain associated with the Proposed Development, just the impacts arising from work directly associated with the Proposed Development itself.

Table 4.2: Construction Phase Direct Impacts

	Aberdeenshire	Scotland
Job Years	168.9	603.9
GVA (£ million)	10.6	32.5

As set out in Table 4.2, around 604 job years are expected to be created in Scotland during the construction phase, with approximately 169 job years created in Aberdeenshire itself.

The Proposed Development could also generate £32.5 million in GVA to Scotland, and £10.6 million to Aberdeenshire.

A large proportion of the direct benefits associated with the Proposed Development are likely to be focused around the construction phase, as this will provide the largest increase in economic activity. The operations and maintenance phase in contrast, while over a longer period of time, will involve a different type of work and therefore does not offer as many direct economic benefits to Scotland and Aberdeenshire.

These direct benefits during the construction phase will offer a **significant economic opportunity** for local workers, businesses, and supply chains. The extent to which these benefits are captured locally will depend on the suitability of local infrastructure and supply chains to take advantage of the construction work necessary for the Proposed Development.

The direct socio-economic impacts will give way to wider economic impacts. This is due to 'ripple' effects created throughout the wider supply chain of the Proposed Development and the local and national economies.

There are two separate and distinct measures of wider economic impact used, which are economic multipliers and estimates of employee spend. Both these approaches are separate, and their results should not be combined to give an impression of total impact, as there will be overlap between each measure of impact.

Nevertheless, each provides a unique perspective on the wider economic benefits on offer from the Proposed Development.

Taking first economic multipliers, they are, in a broad sense, an economic factor which when changed, causes changes in many other related economic variables. This allows for the measurement of the change in final income from any new injection of spending. For example, if a multiplier value is set at 1.5, then £100 of spending will generate £150 in the economy as a whole.

There are two different types of multipliers used. Type I multipliers are a sum of the direct and indirect effects arising from a change in output in a particular industry. The indirect effect measures the effects felt throughout the supply chain resulting from the direct effects of a change in output.

Type II multipliers are, in turn, the sum of the direct, indirect, and induced effects. The induced effect is the effect of the proportion of income re-spent on final products arising from the change in household expenditure from the direct and indirect effects. Together, these two multipliers provide a comprehensive picture of the total wider economic impact from the Proposed Development.

There are sperate multipliers available for employment and GVA impacts. The Scottish Government Input-Output Tables[vii] are used for the construction stage with reference to SIC codes 41-43 (construction) to represent the types of activities likely to be carried out during this phase. Table 4.3 below shows the predicted wider economic impact from the construction phase using these multipliers. Multipliers are only produced at the Scottish national level, and there are no sub-national figures given for regions such as local authorities. Therefore, all discussion of wider economic impact using this method will be restricted to the Scottish national level.

Table 4.3: Construction Phase Scotland Multiplier Impact

	Type I	Type II	Total
Job Years	301.9	181.2	483.1
GVA (£ million)	19.5	9.7	29.2

The construction phase is predicted to generate roughly 483 job years and £29.2 million in GVA resulting from the multipliers' effects. In relation to the direct impact, the employment multipliers represent an 80% increase on the original figure, and the GVA multipliers represent a 90% increase.

In essence, the wider economic benefit felt in Scotland nearly doubles the direct impact. This underscores the valuable economic opportunity from the Proposed Development, both for Scotland and Aberdeenshire.

This will provide valuable support to household incomes, businesses, and local supply chains. It is important to note, that the largest individual channel of impact provided will be through the Type I multiplier effect, effects felt down the supply chain. This reinforces the importance of ensuring that local business and supply chains are well poised to capture the wider economic benefits on offer from the Proposed Development.

Although the multipliers published by the Scottish Government are only representative of Scotland as a whole, it can be estimated through that half of the multiplier impact within Scotland during the construction phase will be felt within Aberdeenshire.

This assumption is in line with economic development impact best practice, and in line with HIE's own impact guidance, in the absence of local economic multipliers in Scotland. As such, this proportion is represented in Table 4.4.

Table 4.4: Construction Phase Aberdeenshire Multiplier Impact

	Type I	Type II	Total
Job Years	42.2	25.3	67.5
GVA (£ million)	3.2	1.6	4.8

As set out in Table 4.4, assuming 50% of the multiplier impact during the construction phase, this is expected to generate a further 68 job years for Aberdeenshire, and £4.8 million in additional GVA.

Bringing together the direct, indirect and induced impacts, it was estimated that the construction phase of the Proposed Development could generate:

- 237 construction jobs and GVA of £15.4 million in Aberdeenshire; and
- 1,087 construction jobs and GVA of £61.7 million in Scotland.

Operational Effects

Table 4.5 shows the anticipated investment in operational expenditure (OPEX) during the operation and maintenance phase of the Proposed Development. All impacts at this phase are represented annually.

The levels of OPEX have been estimated using data from the RenewableUK 2015 study, which details the average costs of onshore wind farm development in the UK. It is estimated that for every MW, £59,867 is spent annually during this phase.

Therefore, based on the 105.6 MW capacity of the Proposed Development, the overall figure of £6.32 million can be estimated (Table 4.5). The geographical distribution is also provided through this study.

Table 4.5: Annual Operation and Maintenance Phase Expenditure (OPEX)

	Aberdeenshire	Scotland	Total
%	42	58	100
£ million	2.65	3.67	6.32

Unlike the construction phase, the Operations and Maintenance investment breakdown is not as detailed. This is partly due to less intensive economic activity which will take place annually compared to the construction phase and that this information is not available for the economic modelling. It is anticipated that 58% of annual OPEX will occur within Scotland and 42% with Aberdeenshire, with £3.67 million accruing to Scotland, of which £2.65 million accruing at the Aberdeenshire level.

The annual OPEX will produce direct economic benefit to Scotland and Aberdeenshire, in terms of employment and GVA creation.

As with the development and construction impacts, the contract values awarded in each of the study areas would represent an increase in turnover in those areas. The economic impact of this increase in turnover was estimated by applying turnover to GVA and turnover per employee ratios for the relevant industries.

Table 4.6: Annual Operation and Maintenance Phase Direct Impacts

	Aberdeenshire	Scotland
FTEs	18.7	37.0
GVA (£ million)	1.32	1.90

As set out in Table 4.6, around 37 Full-time equivalent (FTE) jobs are expected to be created annually in Scotland during the operation and maintenance phase, with around 19 FTEs being created in Aberdeenshire.

The Proposed Development will also generate £1.90 million in GVA annually for Scotland, and £1.32 million for Aberdeenshire. The measure of FTE jobs is used here in contrast to job years during the construction phase, as the operation and maintenance phase will occur over a much longer period of time, therefore the type of employment provided is more akin to full-time, permanent jobs.

As mentioned previously, these figures are lower than those expected during the construction phase. This is mostly due to operation and maintenance work being much less economically intensive than the construction phase. Modern onshore wind farms operate with a significant degree of automation, managed through remote control centres. The Proposed Development will be managed in Scotland, at the RES control centre in Glasgow and these effects are included in the Scottish level effects.

Therefore, this impact will mainly come from any maintenance works required, which may be sporadic, unlike construction where there is a predefined volume of economic activity which is assured to happen.

There will be scope for local resources to be deployed for a range of activities, such as, path, fencing, landscaping and ground work contracts.

There may, however, be local opportunities in respect of site maintenance; including routine tasks such as maintaining site access tracks and bridges, maintaining drainage ditches and repairing gates and fences, habitat management/enhancement works which could be carried out by local contractors and businesses.

Some servicing works is assumed to be undertaken with locally based staff and also through the original equipment manufacturers (OEMs). The level of local economic opportunities would depend on the works required and the selected turbine supplier. Some of the turbine suppliers have locally based staff to do servicing works. It is worth clarifying that not all servicing and maintenance is brought into Aberdeenshire but there are locally based skilled staff to do such works.

As with the construction phase, there will also be wider economic impact arising from the Proposed Development, again measured by using the two separate multiplier and employee spend methods.

Different to the construction phase however, the SIC code 33 (repair and maintenance) is used to better reflect the nature of the wider economic impact arising from these types of activities. Table 4.7 demonstrates the annual wider economic impact through multipliers for the operation and maintenance phase.

Table 4.7: Annual Operation and Maintenance Phase Scotland Multiplier Impact

	Type I	Type II	Total
FTEs	14.79	11.10	25.89
GVA (£ million)	0.57	0.38	0.95

The operation and maintenance phase is predicted to annually generate approximately 25 FTE jobs and £0.95 million in GVA resulting from the multipliers' effects at the Scottish level.

In relation to the direct impact, the employment multipliers represent a 70% increase on the original figure, and the GVA multipliers represent a 50% increase. This underscores the valuable economic opportunity anticipated from the Proposed Development, both for Scotland and Aberdeenshire.

This will provide valuable support to household incomes, businesses, and local supply chains. The largest individual channel of impact provided will be through the Type I multiplier effect, effects felt down the supply chain.

Although the economic activity, annually, at the operation and maintenance phase is less than that of the construction phase, there are tangible local opportunities.

For example, if contracted operation and maintenance staff are required to stay within the local area for work, local goods and services such as food and drink and accommodation will be utilised. Additionally, if there is site maintenance work being carried out, local businesses and supply chains could have opportunities in relation to that type of work.

Although the multipliers published by the Scottish Government are only representative of Scotland as a whole, it can be estimated that half of the multiplier impact within Scotland during the operation and maintenance phase will be felt within Aberdeenshire. As such, this proportion is represented in Table 4.8.

Table 4.8: Annual Operation and Maintenance Phase Aberdeenshire Multiplier Impact

	Type I	Type II	Total
FTEs	3.73	2.80	6.53
GVA (£ million)	0.20	0.13	0.33

As shown in Table 4.8, assuming 50% of the multiplier impact during the operation and maintenance phase, this is expected to generate, in total, an additional 7 FTE jobs for Aberdeenshire, and £0.33 million in additional GVA.

Bringing together the direct, indirect and induced impacts, it was estimated that the operation phase of the Proposed Development could generate:

- 25 operation and maintenance jobs and GVA of £1.7 million in Aberdeenshire; and
- 63 operation and maintenance jobs and GVA of £2.9 million in Scotland.

1.19 Summary

It is estimated that around a third of the total construction investment (£117 million) will occur within Scotland (£42.1 million) as a whole, with a third of that figure accruing to Aberdeenshire (£14.0 million).

Bringing together the direct, indirect and induced impacts, it was estimated that the construction phase of the Proposed Development could generate:

- **237 construction jobs** and **GVA of £15.4 million** in Aberdeenshire; and
- **1,087 construction jobs** and **GVA of £61.7 million** in Scotland.

Based on the 105.6MW capacity of the Proposed Development, the overall annual operational and maintenance expenditure of £6.3 million has been estimated. It is anticipated that 58% of annual OPEX will occur within Scotland and 42% with Aberdeenshire, with £3.7 million accruing to Scotland, of which £2.7 million accruing at the Aberdeenshire level.

Bringing together the direct, indirect and induced impacts, it was estimated that the operation phase of the Proposed Development could generate:

- **25 operation and maintenance jobs** and **GVA of £1.7 million** in Aberdeenshire; and
- **63 operation and maintenance jobs** and **GVA of £2.9 million** in Scotland.

Overall, the secondary research completed to date confirms that the tourism sector is not adversely affected by onshore wind farms. In fact, the tourism sector has continued to grow across Scotland as more wind farms have been developed.

Some of the accommodation providers, and food and drink outlets, will also experience a positive impact from hosting contractors during the construction and ongoing maintenance of the Proposed Development.

Wider Economic Effects

1.20 Introduction

This section sets out some of the wider, longer term, and strategic economic effects associated with the Proposed Development.

1.21 Wider Economic Effects

It is anticipated that the Proposed Development will have wider beneficial effects that are more difficult to quantify at this stage. Nevertheless, these would be expected to have positive effects on the local and national economies including:

- **Local supply chain opportunities:** economic multiplier effects have not been included in the economic assessment due to the difficulty in accurately ascertaining their nature at the local and regional levels. The Applicant will host 'Meet the Buyer' events and suitably qualified local firms invited to bid for different aspects of construction, such as foundation laying and electrical works. Construction materials are normally sourced locally (i.e. within Aberdeenshire) and local transport and plant hire companies used wherever possible.

- **Forming links with local businesses:** There are civil engineering contractors adjacent to the site in the form of Miller Plant and McIntosh Plant. The latter has experience and capability in heavy haulage. Its yard might also be large enough to store equipment/parts. The southern approach to site presented as an option in the Transport chapter has been included in case the contractor can transport the turbine components and wins the work. There are quarries in the area including Breedon Aggregates on the Dunecht Estate which is an option for sourcing stone from if required. The site is on the Dunecht Estate which is a large landholding with local employment which the Proposed Development has the potential to help support through the property rental.

- **Worker expenditure:** It is worth noting Renewable UK research[viii] which estimated that the expenditure of workers who visit the local area benefit the accommodation and food service sector to the value of around £7,500 per MW constructed. This would suggest, based on a 105.6 MW Proposed Development, that further financial benefits of **£792k** would accrue at the regional level, largely benefiting regional tourism businesses. The wider 'knock-on' impacts can in turn support the supply chain of other activities such as the spending habits of retail operations and accommodation providers.

- **Pre-development benefits:** as the development of the Proposed Development is underway in a planning sense, there have already been notable financial and economic effects. To date there has been almost **£900k** in development expenditure, all UK and predominately Scotland, and this is forecast to increase to £950k to submission, which includes for example, almost £25k spent by the Applicant in Aberdeenshire on accommodation, subsistence, local newspapers/publishers to date.

- **Income effects:** the economic analysis has focused on the GVA effects of generated employment as this is the 'real' impact on the economy. However, it is worth noting that new employment will generate additional wages and salaries, much of which will be spent in the UK;

- **Exchequer effects:** the analysis has not attempted to estimate the additional exchequer effects as result of taxes borne (Corporation Tax, Employer National Insurance and Irrecoverable VAT) and taxes collected (Income Tax, Employee National Insurance and non-domestic business rates). These are additional financial benefits which will support the regional and national economies. It is estimated that local **Business Rates alone will be greater than £1 million per annum.**

- **Effects on land owners:** there will be a financial transaction to the land owner (Dunecht Estates) which may support diversification and/or other spending in the local, regional and national economy.

- **Community benefit funds:** The intended community benefit package for the Proposed Development includes a community benefit fund and an opportunity for the local community to invest in the Proposed Development once operational. Income streams from this community benefits package could provide long term revenue to support local community initiatives. Depending on the initiatives and projects brought forward by the local community these could provide positive benefits to the local economy, local facilities and the general quality of life for local residents. The Applicant commits to a community benefit fund of up £5,000 per MW per annum, index linked throughout the operational period of the Proposed Development. Based on the 105.6 MW capacity and an operational period of 50 years this is equivalent to at least **£26.4M of community investment**. As part of this offering, the Applicant is consulting on an unique Local Electricity Discount Scheme (LEDS) which offers an annual discount to the electricity bills of those properties closest to the Proposed Development.

- **Shared ownership:** The Applicant is also considering the development of a model for community shared ownership, offering the community the opportunity to invest up to **10% in the Proposed Development**. Feedback was sought from the public on this offer at the last round of public exhibitions in June 2023. It will be developed and details for it expected to be presented to the relevant community councils post-submission.

- **Community investment programme:** A Hill of Fare Masterplan, as outlined in Annex D, has been produced to showcase the developments/benefits within and outside the Site associated with the Proposed Development during operation. The temporary enabling works compound at the site entrance will become permanent public car parking. The upgraded and new access tracks for the Hill of Fare Wind Farm will provide improved non-vehicular public access across the site. The Cultural Heritage Trail will improve non-vehicular access between the Scheduled Monuments and to the Hill of Fare and provide improved visitor experience through information boards about local assets. The Masterplan highlights the areas of habitat enhancement and forestry replanting envisaged. Land rental income from the Hill of Fare Wind Farm will open opportunity for Dunecht Estate to potentially renovate the shooting lodge on Site making it an off-grid shelter for visitors to rest and discover more about the Estate. There are locations elsewhere on the Dunecht Estate where EV Chargers could be developed through the Community Benefits Package including the abandoned fuel station in the centre of Echt. The Masterplan identifies the location of known contractors local to the Site that have been recognised for potential to supply aggregates, materials, plant & machinery, storage and heavy haulage during construction.

- **Addressing feedback from the community consultation:** The Applicant has completed a series of community consultation events, and a Pre-Application Consultation (PAC) Report has been developed. There were a considerable amount of community views raised in regards to proposals for recreational enhancements, views on local energy discount (LEDs) and shared ownership and community investment ideas in relation to education, skills, transport and community infrastructure. These views are presented in the PAC, and they will add considerable weight to the quantifiable effects presented in this assessment.

1.22 Summary

RES has ambitious plans to transform the local economy and community which goes beyond the construction and operation of the Proposed Development. The aim is to help the area to address long term issues such as demographic decline and connectivity. Through community engagement, it has identified several opportunities to invest in the area, including:

- Local supply chain opportunities
- Forming links with local businesses
- Worker expenditure
- Pre-development benefits
- Income effects
- Exchequer effects
- Effects on land owners
- Community benefit funds
- Shared ownership
- Community investment programme
- Addressing feedback from the community consultation

Net Economic Benefits

1.23 Introduction

This section summarises the net economic benefits set out in this report.

Net Economic Benefits

The Proposed Development delivers a wide range of economic and wider benefits and, in this way, maximises net economic benefits for the local community. This is consistent with the latest planning policy (NPF4) in Scotland.

NPF4 establishes as a requirement for renewable energy proposals that:

"they maximise net economic impact, including local and community socio-economic benefits such as employment, associated business, and supply chain opportunities."

RES bring a demonstrable track record in delivering economic and wider benefits to the communities hosting its developments. This experience, including from onshore wind developments such as, Kintradwell, Glenchamber and Freasdail wind farms and has been used to develop a comprehensive package of benefits for the Proposed Development. More details on these wind farms and their community benefits are presented in Annexes A – C.

Through the delivery of the Proposed Development, it is estimated that:

- **237 construction jobs** and **GVA of £15.4 million** in Aberdeenshire will be generated;
- **25 operation and maintenance jobs** and GVA of **£1.7 million** in Aberdeenshire will be created;
- To date there has been almost **£900k in development expenditure**, all UK and predominately Scotland, and this is forecast to increase to £950k to submission; and
- Spending by construction workers will generate further financial benefits of **£792k at the regional level**.

In addition, RES has committed to:

- deliver a community benefit package worth £5,000 per MW per year of usable capacity, totalling **£26.4 million** over the lifetime of the Proposed Development;
- generate in the region of **£1 million per annum in Non-Domestic Rates**;
- offer of up **10% in shared ownership** of the Proposed Development;
- use, where commercially feasible, **local contractors** and encourage their involvement through a 'Meet the Buyer' event; and
- prepare a **community investment masterplan** with Dunecht Estates.

The benefits associated with the Proposed Development will go beyond supporting economic activity and employment during the wind farm's construction and its operation. In particular, community benefits, the Initial Investment Fund and shared ownership will provide a stream of income for the local community to be reinvested and deliver against its priorities and ambitions.

On this basis, it can be concluded that the Proposed Development maximises net economic impact.

Annex A: Kintradwell Wind Farm Case Study

Local Benefits

RES seeks to be a power for good in the communities that neighbour its projects by working openly and constructively to ensure tangible local benefits.

Some of the most direct and meaningful benefits that can be delivered from a project like Kintradwell are jobs and employment for local businesses and contractors, in addition to the use of local services and amenities, all of which can generate a significant amount of inward investment within the area.

Kintradwell is expected to deliver approximately £4 million of inward investment into the local area in the form of jobs, employment, and use of local services, and more information on this is provided below.

RES partners with local Brora firm to support local jobs

In December 2020, RES announced that it had signed an agreement with local firm Edward Mackay Contractor which gave them right of first offer on the civil construction work for the proposed scheme – helping to secure valuable local jobs and employment opportunities for local people should the project receive consent. Edward Mackay Contractor employs around 100 local staff from areas such as Brora, Golspie and Helmsdale, and has extensive wind farm experience.

Liam Mackay, Director, Edward Mackay Contractor said “All credit to RES for engaging with local businesses and for giving us the opportunity to get stuck into a project on our doorstep, should it proceed. The work that we are looking at is significant and could be a real boost for not only our business but the whole area, so we’re hoping that the community will get behind the project once it’s been submitted into planning.”

RES has also committed to support a local apprentice at Edward Mackay Contractor, with a view to the apprenticeship being completed in time for site construction work starting at Kintradwell.

Involving the local supply-chain

RES is committed to ensuring that, wherever reasonably practicable, local contractors and employees are used in all aspects of wind farm development. The major opportunities arise during the construction phase when suitably qualified local firms are invited to bid for different aspects of construction, such as foundation laying and electrical works. Construction materials are normally sourced locally (i.e. within the county) and local transport and plant hire companies used wherever possible.

Sutherland, and the north Highlands in general, have a fantastic variety of businesses that have extensive experience and skills in wind farm development including local quarries, engineering firms, plant and crane hire, etc. As such, RES is keen to hear from local businesses who may be able to offer skills and services during the construction of Kintradwell Wind Farm. Please contact us if you are a local business and would like to know more about opportunities for the local supply chain.

Annex B: Glenchamber Wind Farm Case Study

Community Benefits

We seek to be a power for good in the communities that neighbour our projects, by working openly and constructively to ensure sensitive design and create tangible local benefits. Local communities benefit from having the Glenchamber Wind Farm in their area in a number of ways.

Local Electricity Discount Scheme (LEDS)

The Local Electricity Discount Scheme (LEDS) is an initiative which seeks to deliver direct and tangible benefits to people living and working closest to Glenchamber Wind Farm.

Under the scheme, LEDS offers a £200 (index linked) annual discount, to the electricity bills of those properties closest to Glenchamber Wind Farm. The scheme is open to all residential, business and community buildings (including schools, places of worship and village halls). Participation in the scheme is voluntary and does not require any change of electricity supplier or tariff. As a fixed amount (index linked), rather than a percentage of electricity bills, LEDS does not reward higher electricity users over lower users or encourage energy profligacy.

For more information please visit https://leds.res-group.com/

Investment in the Community

We believe that local communities should benefit directly from hosting wind farms in their area. A Community Benefit Fund of £55,000 (index linked) per year has been established. The community fund is designed to support social, environmental and educational projects for communities living within, but not limited, to the community council areas of Old Luce, New Luce and Kirkcowan.

Community Fund Case Studies

Arts Inc CIC

Arts Inc is a charitable organisation that uses art to engage with Primary School pupils, and adults with dementia/learning needs. They were awarded a grant to deliver Phase 1 of the 'Roon the Toon' project to Kirkcowan pupils linking in to the Schools Wider Experiences Programme. The project will produce a bespoke board game highlighting historic sites and important buildings in and around Kirkcowan. Arts Inc have already produced eight versions of the game for communities including Wigtown.

New Luce Gardening Group

The New Luce Gardening Group is a band of enthusiastic volunteer gardeners who work to enhance the appearance of the village by planting & maintaining flowerbeds and planters in the village, weeding and clearing neglected areas, mowing and strimming grass areas and clearing rubbish. The Group encourages community involvement and there is participation from many members of the community from pre and school age children through to more senior community members. The hard work and commitment of the Group saw them awarded a Silver Gilt Award by the judges of Scotland in Bloom. A grant from the Glenchamber community fund enabled them to purchase a Drystone Dyking raised bed and other gardening equipment.

Furniture Project (Stranraer) Ltd

The Furniture Project in Stranraer collects unwanted furniture and electrical goods and repairs or restores items to sell or donate to individuals and groups. They also offer work experience placements to young people and adults facing long term unemployment, and have been awarded The Queen's Award for Voluntary Service. A grant from the community fund supported the delivery and collection of furniture and electrical items for members of the public in the Old Luce area. Between September 2017 to August 2018 there were 5130 purchases from the Furniture Project's 2 shops, 828 items delivered and 912 items collected. This equates to 118.8 tons diverted from landfill and 80.2 tons of carbon saved.

Annex C: Freasdail Wind Farm Case Study

Community Benefits

RES is the UK's largest independent renewable energy developer with interests in onshore wind, offshore wind, solar, and energy storage. A wholly owned UK company at the forefront of innovation and design around the world, RES now employs over 1,000 people and has built over 1,000MW of wind energy assets in the UK – around 10% of the UK's total installed capacity.

Throughout the construction of Freasdail (October 2015 - March 2017) RES endeavoured to work with as many local businesses as possible in order to maximise local economic spend. To this end RES held a meet- the-buyer event which encouraged local contractors to come and register their interest in the project ahead of the main construction works taking place. This event resulted in a range of local contractors, services, materials and accommodation providers all having a critical input into the successful construction of Freasdail Wind Farm.

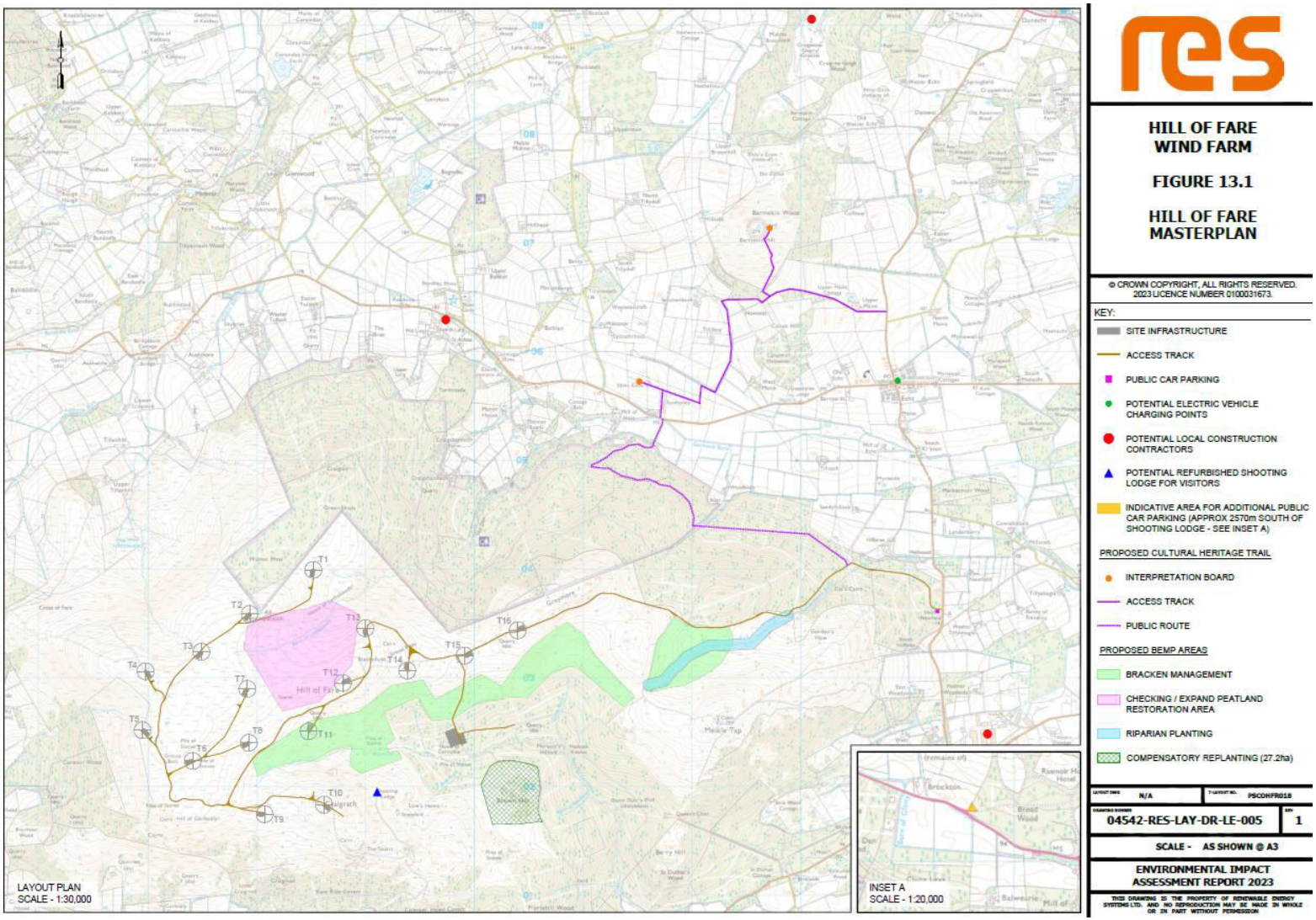
At its peak, over 85 people (during August 2016) were employed on-site in the construction of Freasdail Wind Farm and the associated grid onnection. The balance of the workforce at Freasdail lived locally during the working week, creating significant revenue for local accommodation providers, particularly in Tarbert. The vast majority of the stone and concrete supplies used during the construction were sourced from Furnace Quarry and local drivers were utilised to deliver materials to the site. RES also contracted with local firm A & L McCrae to construct the main site access track and used AMAC Harvesting, another Kintyre business, for forestry works on-site. During August and September 2016 the recently upgraded Campbeltown Harbour was also used by Senvion to bring our turbine components onto the peninsula.

The total sum of local expenditure at Freasdail reached £6.35m once the wind farm was energised in early2017 and can be broken down as follows:

- Local Contractors: £4.21m
- Local Materials: £1.56m
- Supplies / Services: £0.36m
- Local Accommodation: £0.21m
- TOTAL: £6.35m

The example of Freasdail's local construction spend demonstrates that despite the relatively remote location of the Kintyre Peninsula to large contractors, local economic impact can still be significant for a range of smaller local businesses within close proximity of the wind farm.

Annex D: Hill of Fare Masterplan


LAYOUT PLAN
SCALE - 1:30,000
INSET A
SCALE - 1:20,000
HILL OF FARE
WIND FARM
FIGURE 13.1
HILL OF FARE
MASTERPLAN
© CROWN COPYRIGHT, ALL RIGHTS RESERVED.
2023 LICENCE NUMBER 0100031673.
KEY:
SITE INFRASTRUCTURE
ACCESS TRACK
PUBLIC CAR PARKING
POTENTIAL ELECTRIC VEHICLE CHARGING POINTS
POTENTIAL LOCAL CONSTRUCTION CONTRACTORS
POTENTIAL REFURBISHED SHOOTING LODGE FOR VISITORS
INDICATIVE AREA FOR ADDITIONAL PUBLIC CAR PARKING (APPROX 2570m SOUTH OF SHOOTING LODGE - SEE INSET A)
PROPOSED CULTURAL HERITAGE TRAIL
INTERPRETATION BOARD
ACCESS TRACK
PUBLIC ROUTE
PROPOSED BEMP AREAS
BRACKEN MANAGEMENT
CHECKING / EXPAND PEATLAND RESTORATION AREA
RIPARIAN PLANTING
COMPENSATORY REPLANTING (27.2ha)
N/A
PSCOHFR018
04542-RES-LAY-DR-LE-005
1
SCALE - AS SHOWN @ A3
ENVIRONMENTAL IMPACT ASSESSMENT REPORT 2023
THIS DRAWING IS THE PROPERTY OF RENEWABLE ENERGY SYSTEMS LTD. AND NO REPRODUCTION MAY BE MADE IN WHOLE OR IN PART WITHOUT PERMISSION

[i] Calculated by multiplying the installed capacity in MW by the number of hours in a year (8760) and then multiplying this by DESNZ's long-term average load factor for (onshore + offshore) wind (32.08%) expressed as a fraction of 1 (e.g. 0.3208). Source for capacity factors is Digest of United Kingdom Energy Statistics (DUKES) published annually by DESNZ (Department for Energy Security and Net Zero). Calculated using the most recent statistics from DESNZ showing that annual GB average domestic household consumption is 3,509kWh (as of December 2022, updated annually).

[ii] Ibid

[iii] https://www.gov.scot/collections/scottish-index-of-multiple-deprivation-2020/

[iv] https://www.gov.uk/government/publications/onshore-wind-direct-and-wider-economic-impacts

[v] https://cdn.ymaws.com/www.renewableuk.com/resource/resmgr/publications/reports/onshore_economic_benefits_re.pdf#:~:text=Our%20analysis%20of%20economic%20impact%20of%20onshore%20wind,economy%20increased%20by%2065%25%20from%20%C2%A3548m%20to%20%C2%A3906m

[vi] https://www.gov.scot/publications/scottish-annual-business-statistics-2021/

[vii] https://www.gov.scot/publications/input-output-latest/

[viii] https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/48359/5229-onshore-wind-direct--wider-economic-impacts.pdf