Section 4
RENEWABLES, PLANNING AND POLICY

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Figure 1	CCC's Emissions Target Adjustment Recommendations to the Scottish Government

Abbreviations

Abbreviation	Description
AI	Additional Information
AR6	Sixth Assessment Report
CCC	The Climate Change Committee
CCPu	Update to the Climate Change Plan
EIAR	Environmental Impact Assessment Report
ESJTP	Energy Strategy and Just Transition Plan
GW	Gigawatt
IPCC	Intergovernmental Panel on Climate Change
LDP2	Local Development Plan 2
LDP3	Local Development Plan 3
MW	Megawatt
NPF3	National Planning Framework 3
NPF4	National Planning Framework 4
OWPS	Onshore Wind Policy Statement
SPP	Scottish Planning Policy
SYR	Synthesis Report

Section 4: Renewables, Planning and Policy

4.1 Introduction

4.1.1 This section provides an update to the previously submitted Section 4 'Planning Policy' in the November 2020 Environmental Impact Assessment Report (EIAR), detailing the renewable energy policy framework. It is the primary aim of this chapter to set out the context in which the Proposed Development will be considered, and this chapter focuses on policy developments since November 2020.

4.1.2 A detailed assessment of both international and national planning policy is provided in both Section 4 of the EIAR and the original Planning Statement which accompanies and supports the original application to the Scottish Government under Section 36 of the Electricity Act 1989. This updated policy review should be read in conjunction with the original Section 4 'Planning Policy', the 2020 Planning Statement and the updated Planning Statement submitted with the Additional Information (AI) submission. The accompanying AI Planning Statement will contain a more detailed assessment of the Proposed Development against these climate change, renewable energy, and planning policy considerations.

4.2 National Planning Framework 4

4.2.1 NPF4 was approved by Scottish Ministers by 88 votes to 30 in January 2023, following the publication of a Revised Draft in November 2022 and the publication of the draft fourth National Planning Framework in November 2021. Having been approved, it is now part of the statutory development plan, replacing National Planning Framework 3 (NPF3) and Scottish Planning Policy (SPP), and forms the foundation of planning policy in Scotland.

4.2.2 Underpinning the Scottish Government's approach to planning policy is the assertion that we are facing a dual global climate emergency, one which should spur us on to pursue the legally binding emissions targets legislated under the Climate Change (Emissions Reductions Targets) (Scotland) Act 2019, which requires net zero emissions by 2045. In the Ministerial Foreword to NPF4, the Minister for Public Finance, Planning and Community Wealth, states that "*putting the twin global climate and nature crises at the heart of our vision for a future Scotland will ensure the decisions we make today will be in the long-term interest of our country*". This NPF4 aims to promote collaboration, inclusivity, and fairness, which will help Scotland reach net zero by 2045 through a Just Transition.

4.2.3 Part 1 details the National Spatial Strategy for Scotland 2045. With the world facing "*unprecedented challenges*", planning can deliver the changes which will be necessary to secure a prosperous future for Scotland, both economically and environmentally. Part 1 states that "*we also need to be clear about the types of infrastructure we will need to build, and the assets that should be protected to ensure they continue to benefit future generations*". Included in this section are 6 overarching Spatial Principles which will help guide and deliver the Scottish Government's future plans.

4.2.4 The six overarching spatial principles guiding this NPF4 are:

- Just transition
- Conserving and recycling assets
- Local living
- Compact urban growth
- Rebalanced development
- Rural revitalisation.

4.2.5 Underpinning these spatial principles are three further categories of 'places':

- Sustainable places
- Liveable places
- Productive places.

4.2.6 Scotland's national spatial strategy for 'sustainable places' begins by arguing that significant progress must be made, by 2030, to be able to achieve net zero emissions by 2045; tackling the climate emergency will require a multi-sector approach, and it must "*involve, and be fair to, everyone*". The Scottish Government's ambition to improve the security of Scotland's electricity supply is supported directly by the national developments that underpin the future 'sustainable places', most notably the Strategic Renewable Electricity Generation and Transmission Infrastructure national development.

4.2.7 There is a Statement of Need relating to this national development, Strategic Renewable Electricity Generation and Transmission Infrastructure, in Annex B of NPF4. The Statement of Need reiterates that a "*large and rapid increase in electricity generation from renewable sources will be essential for Scotland to meet its net zero emissions targets*" with "*new capacity helping to decarbonise heat, transport and industrial energy demand*". Overall, these additional projects will "*likely have an overall net positive impact on achieving national greenhouse gas emissions reductions targets*".

4.2.8 Part 2, National Planning Policy, elaborates on the sustainable, liveable, and productive themes which are included in this NPF4. Firstly, by listing the policy principles, policy intent, and policy outcomes, the Scottish Government aims to foster a supportive policy environment for the creation of sustainable places. The policies which are relevant to the proposed development are:

- Policy 1: Tackling the climate and nature crises;
- Policy 2: Climate mitigation and adaptation
- Policy 3: Biodiversity;
- Policy 4: Natural places;
- Policy 5: Soils;
- Policy 6: Forestry, woodlands and trees;
- Policy 7: Historic assets and places;
- Policy 11: Energy.

4.2.9 Connected to "*all other policies*", Policy 1 ('Tackling the climate and nature crises') states that "*when considering all development proposals significant weight will be given to the global climate and nature crises*". This command, that decision makers must pay heed to the weight of the climate crisis, is a significant

progression from previous planning policy. This policy is thus of particular relevance to the proposed development and represents a fundamental change in the planning balance compared to the policy position of the now replaced NPF3 and SPP.

4.2.10 Policy 2 ('Climate mitigation and adaptation') is also connected to all other NPF4 policies, and encourages that new developments minimise emissions as much as possible. Part a) states that *"development proposals will be sited and designed to minimise lifecycle greenhouse gas emissions as far as possible".* Centrally, Policy 2 contributes to the six overarching principles which guide NPF4.

4.2.11 Policy 3 ('Biodiversity') is also applicable and of particular relevance to the proposed development, particularly when taking into account the content of Scotland's Biodiversity Strategy to 2045. NPF4 sits alongside other relevant policy documents which reiterate the need for Scotland to reverse its biodiversity loss and deliver nature positivity. Policy 3 aims to enhance biodiversity and deliver nature-based solutions to Scotland's biodiversity issues. NPF4 urges developments to restore and enhance biodiversity, for example through extensive mitigation and subsequent habitat restoration and habitat connectivity. Policy 3, in part b, recommends that "*local community benefits of the biodiversity and/or nature networks*" should be taken into consideration for national or major developments; this will bolster nature education and enjoyment in the host communities around these developments.

4.2.12 Policy 4 ('Natural places') intends to "*protect, restore and enhance natural assets*" whilst also growing their "*essential benefits*". Part d) states that "*development proposals that affect a site designated as… a local landscape area in the LDP 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*". The introduction of this balance, where significant effects can be clearly outweighed, is crucial. Furthermore, in part g), it states that "*development proposals in areas identified as wild land… will only be supported where the proposal… will support meeting renewable energy targets*".

4.2.13 Policy 5 ('Soils') promotes minimal disruption to carbon-rich soils and peatlands. This policy aims to ensure that Scotland's "*soils are healthy and provide essential ecosystem services for nature, people and our economy*". Part c) expressly supports the construction of development proposals relating to the generation of energy from renewable sources on peatland, carbon-rich soils and priority peatland habitat that optimise the contribution of the area greenhouse gas emissions reduction targets. Alongside this declaration of support, part d) details the site-specific assessments which are required for development on peatland is proposed; baseline depth, habitat quality, and stability of the soil will all be taken into account.

4.2.14 Policy 6 (Forestry, woodland and trees) intends to protect and expand Scotland's forests, woodland and trees through expansion and sustainable management. In tandem with Local Development Plans, NPF4 policy 6 states that development proposals will be supported if they *"enhance, expand and improve woodland and tree cover".* If a development proposal would result in loss or damage to ancient woodland, trees of high biodiversity value, or areas protected under the Forestry and Woodland Strategy, then it will not be supported. If a development proposal involves woodland removal, it will only be supported *"where they will achieve significant and clearly defined additional public benefits".*

4.2.15 Policy 7 ('Historic assets and places') aims to facilitate the protection, enhancement, and regeneration of historic environment assets and places. Development proposals should assess their impact on the cultural significance of a historic asset or place, especially if it is suspected that the proposed development will have a significant impact. Furthermore, in part c), Policy 7 states that *"development proposals affecting the setting of a listed building should preserve its character, and its special architectural or historic interest",* followed by part d) which states that development proposals should consider the *"architectural and historic character of the area".* Part h) promotes the avoidance of "*direct impacts on the scheduled monument"* and *"significant adverse impacts on the integrity of the setting of a scheduled monument"*.

4.2.16 Policy 11 ('Energy') is a fundamental policy relating to the promotion and acceleration of renewable energy generation in Scotland, as Scotland seeks to achieve net zero by 2045. In conjunction with a myriad of NPF4 policies (such as Policy 1, Policy 2, Policy 3, Policy 4, Policy 5 and Policy 7), Policy 11 includes parameters to facilitate the acceleration of onshore and offshore renewables, both in terms of established (wind) and nascent (hydrogen, carbon capture, energy storage) technologies. The policy outcome is the "*expansion of renewable, low-carbon and zero emissions technologies*".

4.2.17 Part a) of Policy 11 states that "*development proposals for all forms of renewable, low-carbon and zero emissions technologies will be supported*". These development proposals include:

- Wind farms including repowering, extending, expanding and extending the life of existing wind farms;
- Enabling works, such as grid transmission and distribution infrastructure;
- Energy storage, such as battery storage and pumped storage hydro;
- Small scale renewable energy generation technology;
- Solar arrays;
- Proposals associated with negative emissions technologies and carbon capture;
- Proposals including co-location of these technologies.

4.2.18 This support for renewable energy is explicit and unequivocal. In part c) of Policy 11, it states that proposals will be supported where they "*maximise net economic impact, including local and community socio-economic benefits such as employment, associated business and supply chain opportunities*". This policy therefore is deeply joined with the wider aim of the Scottish Government to facilitate a 'Just Transition' to net zero, where everyone across Scotland is treated fairly and reaps the benefits of the decarbonisation of the energy networks and the wider Scottish economy and industry.

4.2.19 In terms of the wider impacts of the proposed development or renewable energy project, part e) of Policy 11 includes a list of impacts which must be addressed through project design and mitigation, such as:

- Impacts on communities and individual dwellings, such as visual amenity, noise, and shadow flicker;
- Significant landscape and visual impacts;
- Impacts on aviation and defence interests;
- Impacts on telecommunications and radio;
- Effects on hydrology;
- Biodiversity and ornithology impacts.

4.2.20 In considering these impacts, it is important to note that in detailing the significant landscape and visual impacts in part e), there is a recognition that "*such impacts are to be expected for some forms of renewable energy… where appropriate design mitigation has been applied, they will generally be considered to be*

acceptable". Furthermore, following part e), it is stated that "*significant weight will be placed on the contribution of the proposal to renewable energy generation targets and on greenhouse gas emissions reduction targets*". This is a crucial inclusion and links Policy 11 deeply to Policy 1, which attaches significant weight in planning policy to the global climate change emergency which is recognised as a priority in all plans and decisions.

4.3 The Onshore Wind Policy Statement

4.3.1 The Draft Onshore Wind Policy Statement was published in October 2021, and in December 2022, the Scottish Government officially adopted the document, thus replacing the 2017 Onshore Wind Policy Statement. The Onshore Wind Policy Statement 2022 (OWPS) is a statement of Scottish Government policy in relation to onshore wind developments and is a significant material consideration in the determination of applications for onshore wind developments. The OWPS covers a myriad of areas, including:

- The Scottish Government's ambitions and aspirations for onshore wind, and how they aim to achieve them;
- How the benefits onshore wind can be maximised, yet balanced alongside environmental and other considerations;
- The community benefits associated with onshore wind;
- Technical considerations.

4.3.2 In the Ministerial Foreword from Cabinet Secretary for Net Zero, Energy and Transport, Michael Matheson, it is stated that the world is facing dual emergencies: the damaging climate emergency, and a cost crisis relating to the price of fossil fuels. It is for these reasons that he advocates for a whole-hearted and accelerated transition to a low-carbon energy system, achieving a 'Just Transition to Net Zero' by 2045.

4.3.3 It is also stated that Scotland is a "*frontrunner in onshore wind*", with almost 9 gigawatts (GW) in operational onshore capacity. It is a technology that is "*reliable*" and one that can be "*deployed quickly*", placing it in a much more favourable position to nascent technologies, such as nuclear fission, which are not yet cheap nor commercially viable. The Cabinet Secretary sets out the Scottish Government's ambition to work alongside industry representatives, communities, and non-governmental organisations to deliver a rapid roll-out of onshore wind, as the Scottish Government seeks to meet their legally binding climate targets.

4.3.4 Chapter 1 details the current status of onshore wind deployment in Scotland. Paragraph 1.1.4 first sets out the Scottish Government's ambition to "*increase*" the deployment of onshore wind through the maintenance and protection of the supportive policy framework. Paragraph 1.1.5 sets out that "*the UK has 14.6 GW of installed onshore wind, with 8.7 GW of this in Scotland*", and a further "*11.3 GW*" in Scotland's planning pipeline.

4.3.5 Section 1.2 details the Scottish Government's 'Deployment Ambition to 2030'; to reach net zero by 2045, and to deliver interim targets, of a 75% reduction in carbon emissions by 2030. Scotland will need to deploy an additional 12 GW of installed onshore wind by 2030, taking the total installed onshore wind capacity to over 20 GW. Paragraph 1.3.2 set a concrete ambition of "*a minimum installed capacity of 20 GW of onshore wind in Scotland by 2030*". This is a significant target, one that will lead to a rapid decarbonisation of Scotland's energy system.

4.3.6 Section 1.4, specifically paragraph 1.4.1, establishes the existing legislative context with which the OWPS has been published. In September 2019, the Climate Change (Emissions Reduction Targets) (Scotland) Act 2019 was passed by Scottish Parliament. Crucially, the 2019 Act is legally binding, committing Scotland to achieving net zero emissions by 2045 at the latest. Four years on, the Scottish Government hope that the publication of the OWPS will encourage collaboration between a myriad of sectors in the transition to a net zero economy and energy system.

4.3.7 The Scottish Government's onshore wind deployment ambitions are admirable. The proposed Scoop Hill Community Wind Farm development, with an estimated 432 megawatt (MW) generating capacity, represents a valuable portion of the 'in planning' figure included in paragraph 1.1.5. Of the desired 12 GW of further deployment by 2030, the proposed Scoop Hill development, if consented, would contribute around 3.6% of this target. This is a valuable contribution as the Scottish Government seeks to accelerate the deployment of this cheap and trusted renewable technology.

4.3.8 Chapter 2 of the OWPS details how Scotland will deliver their onshore wind ambition. To begin, it is stated, in paragraph 2.1.1, that the Scottish Government will seek to maximise the economic and social benefits of a just transition, through a collaborative approach across industry, government, and communities. In paragraph 2.1.2 it is signalled that an Onshore Wind Strategic Leadership Group (SLG) will be established, and an Onshore Wind Sector Deal will be developed, following appropriate discussion and consultation.

4.3.9 The Onshore Wind Sector Deal, in a similar vein to existing deals of this manner, such as the UK Government's Offshore Wind Sector Deal and the Artificial Intelligence Sector Deal, will help deliver government ambitions and grow this key sector. As it is stated in paragraph 2.4.2, "*onshore wind will play a crucial role in delivering our legally binding climate change targets*", and that there are significant economic opportunities here that can be maximised upon. Driving GVA, enhancing local benefits, and providing well-paid skilled jobs for a diverse range of people are key focuses highlighted for the future Onshore Wind Sector Deal.

4.3.10 In Chapter 3, 'Environmental Considerations: Achieving Balance and Maximising Benefits', achieving net zero emissions by 2045 remains a principal concern. In this chapter, issues of shared land use, peat and carbon-rich soils, forestry, biodiversity, landscape and visual amenity and NPF4, and noise are discussed. Paragraph 3.1.2. states that a balance must be struck between accelerating the deployment of renewable energy and maximising economic and environmental benefits available for Scotland.

4.3.11 Paragraphs 3.3.6 and 3.3.7 detail the balance between peat protection and accelerated onshore wind deployment across Scotland. Both will play "*vital roles in delivering Scotland's emissions reductions targets*", however the "*need for additional onshore wind turbines to tackle climate change*" means it may be "*necessary to construct onshore wind farms on areas of peat*". It is recognised here that onshore wind farm developers have made significant advances in the restoration of peat and mitigation of effects on peatlands, and paragraph 3.3.9 details that "*Scotland's onshore wind sector can bring many and considerable benefits to rural areas*".

4.3.12 In section 3.4, 'Forestry', paragraphs 3.4.2 to 3.4.4 detail the Scottish Government's ambitions for woodland creation and forestry protection in the coming years. In a similar vein as to why peatlands are protected, woodland creation targets will achieve carbon reductions and existing forestry is protected by preservation goals. Onshore wind developers have incorporated forestry considerations into environmental assessments for "*more than a decade*", and paragraph 3.4.4 states that "*this proves that the protection of forestry and the promotion of onshore wind already co-exist*".

4.3.13 Paragraphs 3.4.5, 3.4.6, and 3.4.7 elaborate on how onshore wind farms can be accommodated in forested areas, particularly developments with taller turbines which are now considered to be "*more common and must continue to be deployed in appropriate locations".* Keyhole felling, as opposed to clear-felling, where

entire areas of forest are felled, allows taller turbines to be integrated into forested areas, unleashing opportunities for onshore developments with a smaller number of higher-capacity turbines. Paragraph 3.4.7 states that these taller turbines "*allow the Scottish Government commitments to both onshore wind development and re-forestation to continue to complement one another*".

4.3.14 Section 3.5, 'Biodiversity', details the centrality of biodiversity and nature positivity in Scottish Government planning and energy policy. Scotland's 'Biodiversity Strategy to 2045' has been assessed separately within this AI chapter, in section 4.6. Biodiversity positivity, characterised by wildlife protection, conservation and enhancement, are tenets of NPF4 and, as such, have been included in the OWPS to ensure policy continuity. Crucially, the Scottish Government are calling for proactive management of habitats and species and restoration of degraded areas; paragraph 3.5.7 states that "*evidence shows that significant positive effects for biodiversity from wind farm developments can be achieved*". Developers will be expected to adhere to this OWPS and "*demonstrate a clear commitment to protecting and restoring habitats*".

4.3.15 Section 3.6, 'Landscape & Visual Amenity and National Planning Framework 4', again reiterates the necessity for Scotland to reach the legislated emissions reductions targets, with particular and concrete mention to the accelerated deployment of onshore wind which must occur before 2030. Paragraph 3.6.1 states that taller, more efficient turbines are required to make the 20 GW target attainable, and that this will "*change the landscape*".

4.3.16 In paragraph 3.6.2, details of the now-published NPF4 are included, stating how assessment criteria for renewable energy developments have been updated. Crucially, in the face of the global climate emergency, greater weight will now be placed on the contribution of the development in tackling the climate emergency with an acknowledgement that the only areas where wind farms will not be supported is in National Parks and National Scenic Areas. The OWPS also asserts that "*significant landscape and visual impacts are to be expected for some forms of renewable energy*". Thus, landscape and visual sensitivities will be assessed alongside the carbon-saving benefits which a development may deliver to Scotland and the wider renewable energy framework in the UK.

4.3.17 Chapter 4, 'Benefits to Local Communities and Financial Mechanisms', seeks to establish the key methods in which economic and social benefits can be maximised during the transition to a net zero economy. This means maximising benefits in every sector, for the whole of Scotland. Chapter 4 considers community benefits and supply chain plans, and how onshore wind can continue to contribute to these. Communities and businesses remain at the centre of Scotland's Just Transition.

4.3.18 The benchmark for community benefits (£5,000 per installed MW per annum) remains the same. As communities remain at the heart of the transition to net zero, it is therefore important that economic provisions are made for local communities which host onshore wind developments. Paragraph 4.2.8 states that "*it is vital that communities are strongly engaged and involved in agreeing the best approach for their area*".

4.3.19 Leading on to Chapter 5, 'Onshore Wind and Benefits to Scotland', the web of benefits which onshore wind developments bring to Scotland (and will continue to bring as the path to net zero is progressed) is established. The chapter covers the benefits and opportunities provided by onshore wind in delivering supply chain support, skills and jobs, and increased tourism.

4.3.20 The OWPS includes significant detail on how the acceleration of onshore wind deployment in Scotland will bolster Scotland's economy and jobs market. Paragraph 5.1.5 states that "*onshore wind already provides significant support to local economies across Scotland",* whilst paragraph 5.2.1 details Scotland's well-established energy supply chain and skilled jobs market, which the onshore wind sector can continue to support whilst the Scottish Government devises new manufacturing supply chain opportunities. Paragraph 5.2.2 details the 2021 Onshore Wind Prospectus, published by RenewableUK, which suggests that "*approximately 17,000 jobs and the equivalent of £27.8bn in GVA could be achieved in Scotland if we are able to deploy an additional 12 GW by 2030*".

4.3.21 Section 5.6 focuses on the role of tourism in Scotland's economy, and how onshore wind plays a part in that. The OWPS reassuringly states that, despite some "*discreet*" impacts of onshore wind on Scotland's tourism sector, it is "*not the general rule*" that onshore wind deployment has a negative effect on tourism. In fact, as stated in paragraph 5.6.6, the Scottish Government are eager to cultivate a "*people and place approach*" by further embedding onshore wind with tourism, thus promoting the development of significant economic opportunities already afforded to Scotland's communities and sectors. In paragraph 5.6.7, it is stated that many wind farm developments already boost tourism, through the promotion of outdoor recreation and education in and around the development sites.

4.3.22 Chapter 6, 'Onshore Wind and Aviation Considerations', details the balance which must be struck between achieving the *"pace of deployment [of onshore wind] necessitated by the climate emergency*" and achieving timely solutions to the impact of wind turbines on aviation radar and seismological operations. The OWPS reiterates that partnerships with a focus on delivering net zero by 2045, between the renewable energy industry and the Scottish Government, will be crucial to achieving tangible progress on these issues.

4.3.23 Chapter 7 is 'Onshore Wind and Technical Considerations'. Section 7.2, and the paragraphs therein, detail the Eskdalemuir Seismic Array in the Scottish Borders. As the MoD's policy for seismic noise budget allocation is due for review, paragraph 7.2.8 details that the Scottish Government "*remains engaged*" with the MoD, and paragraph 7.2.10 details the Scottish Government's desire for the MoD to adjust the "*calculation for budget utilisation*" and importantly, works remain ongoing.

4.3.24 Chapter 8, 'Onshore Wind, Energy Systems and Regulation', includes multiple paragraphs relating to the security of electricity supply in Scotland and the potentiality of energy storage technologies. In paragraphs 8.4.3, 8.4.4 and 8.4.5, it is contended that energy co-location and the construction of on-site battery storage facilities will help onshore wind reach its full potential and assist with the operation of the electrical grid system. The OWPS states that, as the inclusion of battery storage facilities alongside renewable energy developments becomes "*more prevalent*", these co-location proposals will continue to be supported by the Scottish Government which will *"add resilience to the energy system"*.

4.4 Draft Energy Strategy and Just Transition Plan

4.4.1 In March 2021, the Scottish Government published their Energy Strategy Position Statement, a 30-page document which sets out the Scottish Government's ambitions for economic recovery following the Covid-19 pandemic, ensuring a swift and Just Transition to net zero by 2045. The report focused on Scottish energy policy, beginning by setting out the *"legal commitment*" to deliver the transition to net zero, as Scotland is bound by the Climate Change (Scotland) Act of 2009.

4.4.2 Scotland has some of the most ambitious climate legislation in the world. To support the requirements of the Paris Agreement, Scotland enacted the Climate Change (Emissions Reductions Targets) (Scotland) Act in 2019, which amended the 2009 Climate Change (Scotland) Act by making the target much more stringent. Under the 2019 Act, there is a new legally binding target which requires greenhouse gas emissions to be reduced by 100% by 2045, compared to 1990 levels.

4.4.3 In January 2023, the Cabinet Secretary for Net Zero, Energy and Transport, Michael Matheson MSP, and the Minister for Just Transition, Fair Work and Employment, Richard Lochhead MSP, published the Draft Energy Strategy and Just Transition Plan (ESJTP) for consultation. The ESJTP aims to facilitate the delivery of a resilient net zero energy system, one powered by clean energy. In a statement to the Scottish Parliament on the 10th of January 2023, Michael Matheson stated that Scotland's energy sector is "*one of Scotland's most important industries*" and it is at a "*pivotal point*" in the transition to net zero.

4.4.4 The Foreword states that "*Scotland is at the forefront of the clean energy transition and Scotland's green jobs revolution is underway*". The ESJTP sets out the key ambitions held by the Scottish Government for Scotland's energy future, particularly around their ambitions for additional renewable energy generation capacity – from wind, solar, and hydro – and additional energy storage capacity to boost Scotland's energy security. The ESJTP also highlights the need for cooperation and dialogue between the Scottish Government and the UK Government, to maximise the delivery of "*tangible action*" in the transition to net zero.

4.4.5 The ESJTP sets out the Scottish Government's ambition to deploy more than "*20 GW of additional renewable electricity on and offshore by 2030*". This is a significant target, one which shapes the rest of the Strategy's vision for the 2020s, 2030s, and up to 2045.

4.4.6 For Scotland to be a "*renewable powerhouse*", the Scottish Government will "*significantly scale up renewable energy production, including on and offshore wind power, renewable hydrogen, marine energy, solar and hydro*", whilst also maximising the "*community and economic benefits*" for Scotland's businesses, workers, and citizens. A complete net zero energy system will make Scotland more robust and able to cope with global energy shocks or energy crises.

4.4.7 The ESJTP proffers that, to achieve change, the UK Government must act too, including in the realms of energy affordability, electricity market reform, supporting Scottish sectors, and introducing new market mechanisms. With the support of the UK Government, Scotland will be ready for a whole-system Just Transition to net zero.

4.4.8 Within the ESJTP, the delivery of a Just Transition for Scotland's communities revolves centrally around maximising the economic benefits which they can receive from a transition to renewable energy technologies, such as community benefits and green jobs or further employment opportunities. A Just Transition will also aim to drive investment across the whole of Scotland, so that "*the people of Scotland*" can "*reap the economic benefit of the energy transition*".

4.4.9 A salient target at the centre of the ESJTP, is the deployment of more than 20 GW of additional on and offshore wind capacity, which includes a specific ambition to deliver 12 GW of onshore wind by 2030. Alongside this, the Scottish Government want to work with the renewable energy and wind industry to deliver an Onshore Wind Sector Deal in 2023, with dialogue and consultations currently ongoing. Prioritising home-grown wind energy is a central aspect of the ESJTP.

4.4.10 Scotland leads the way in onshore wind development. With almost 9 GW of onshore wind currently installed in Scotland, delivering a further 12 GW of onshore wind capacity by 2030 is more than a 122% increase. To elaborate on how this increase will be delivered, the ESJTP points to the recently published Onshore Wind Policy Statement, a document which was assessed in Section 4.3 of this AI chapter.

4.4.11 To bolster Scotland's energy security and resilience, the ESJTP outlines utility scale battery storage as a key facilitator to this. Utility scale batteries use lithium-ion technology to store a few hours' worth of dispatchable electricity, which can be dispatched to the grid as soon as it is required. By deploying Battery Energy Storage System (BESS) sites across Scotland, and by co-locating battery technologies alongside operational renewable energy developments, Scotland's electrical grid will remain balanced.

4.4.12 Published alongside the ESJTP is a partial Business and Regulatory Impact Assessment (BRIA), which helps estimate the costs and benefits of the proposed legislation. The partial BRIA, published in December 2022, states that Scotland is an "*energy rich nation*" with extensive ambitions to accelerate the roll-out of additional low carbon and renewable energy capacity with maximised economic benefits. Where the ESJTP provides a strategic direction for the future of energy in Scotland, the BRIA urges sensible coordination between government and stakeholders to ensure the best transition possible.

4.4.13 The BRIA assesses that updating the ESJTP will produce an adequate energy roadmap to 2045, covering the evolution of Scotland (by 2030) into a renewable powerhouse that will allow Scotland to "*continue to benefit from exporting electricity and open up the huge opportunities of vast renewable hydrogen production for use in Scotland and for export*". This transition will have significant effects, including: the growth in number of supply chain businesses, significant levels of increased investment in electricity networks, increased opportunities for employment and economic activity within Scotland's communities, and a huge increase in low carbon jobs. It is estimated that low carbon jobs could grow by 70,000 by 2045, with a growth of 17,000 by 2030 in the onshore wind sector alone.

4.5 British Energy Security Strategy

4.5.1 The British Energy Security Strategy was published on 7th April 2022 and outlines a roadmap for Britain to reach energy autonomy in the face of extreme threats to our secure energy supply. This policy paper represents a long-term vision held by the British government, one in which wind power takes a central standing.

4.5.2 In the foreword, then-UK Prime Minister Boris Johnson states:

"…we need a flow of energy that is affordable, clean and above all, secure… we're going to take advantage of Britain's inexhaustible resources of wind…"

4.5.3 The Energy Security Strategy outlines four ways in which we can take advantage of our onshore wind resource:

- Develop partnerships for a number of onshore wind projects
- Include onshore wind technologies in future Contracts for Difference auctions
- Repowering existing sites and promoting the use of advancing wind technologies
- Co-location of multiple forms of renewable energy within one development site

4.5.4 Co-location is the practice of developing sites with a form of electrical generation, and a form of energy storage. Thus, excess energy that is generated on the site, for example by wind turbines or solar panels, is then stored in the batteries and can be released at a later date to support the electrical grid supply. The British Energy Security Strategy places emphasis on the need for battery storage developments in the future to balance supply and demand, particularly co-located on onshore wind sites.

4.5.5 The proposed Scoop Hill Community Wind Farm will consist of a 200 MW of battery storage which will store electricity generated by the turbines on-site. A key focus of this Strategy is the prioritisation of "*hyper-*

flexibility in matching supply and demand so that minimal energy is wasted". Furthermore, in the 'key measures' section relating to wind power, the British Energy Security Strategy outlines an ambition for the UK Government to "*develop appropriate policy to enable investment in long-duration energy storage*". The battery storage system which is co-located alongside the proposed Scoop Hill Community Wind Farm will therefore act as an energy balancing mechanism, bolstering the flexibility of Scotland's energy system.

4.6 Scotland's Biodiversity Strategy to 2045

4.6.1 In December 2022, the Scottish Government published their 'Biodiversity Strategy to 2045: tackling the nature emergency'. The strategy promotes the regeneration of biodiversity across the whole of Scotland. In the Ministerial Foreword, the Minister for Green Skills, Circular Economy and Biodiversity, Lorna Slater, reiterates the Scottish Government's dedication to collaborating on biodiversity issues; discussions with "*large corporate players, small businesses, land managers, non-governmental organisations and Scotland's communities*" will ensure delivery of progress in biodiversity protection.

4.6.2 The strategy contains 26 Priority Actions to help Scotland stay on track as they endeavour to become nature positive by 2030. Nature positivity is characterised by restoration, regeneration, and protection of Scotland's biodiversity, habitats, and land and sea ecosystems. The strategy states that a monitoring and reporting framework will be established to track the halting of biodiversity loss in Scotland by 2030. It corresponds closely to mentions of biodiversity and nature positivity in NPF4, which was assessed in detail earlier in this AI chapter.

4.6.3 Underpinning the Biodiversity Strategy is the assertion that Scotland is facing "*twin reinforcing crises: a decline in biodiversity will exacerbate the climate crisis – and a changing climate will accelerate the rate of biodiversity loss*". The Scottish Government therefore aims to promote collaboration between developers and nature organisations to slow the changes currently affecting biodiversity levels. Under the broader ambition of net zero emissions by 2045, a careful balance must be struck between transitioning the energy network to low-carbon sources, whilst also ensuring the protection of habitats and ecosystems.

4.6.4 The strategy highlights the barriers which are hampering efforts to address the biodiversity crisis, including peoples' lack of knowledge surrounding nature and animal species. By 2045, the Scottish Government desire that biodiversity and nature education are embedded into the national curriculums. There has been progress in some sectors, such as in the farming landscape, where small-scale restoration of ponds or hedgerows has improved biodiversity levels.

4.6.5 In Chapter 3 of the strategy, Strategic Vision and Outcomes, an illustration of 2045 (including placement of wind farms) is included. By 2030, the Scottish Government seek to ensure that development proposals will contribute to the enhancement of biodiversity, degraded habitats, and nature networks. By doing this, the strategy argues that Scotland will be seen as a global leader in fulfilling its international obligations and Convention on Biological Diversity (CBD) goals.

4.7 The Climate Change Committee's Reports

4.7.1 Since November 2020, the Climate Change Committee (CCC) has published multiple reports. In December 2020, the Scottish Government published their Update to the Climate Change Plan [2018-2032] (CCPu), titled 'Securing a Green Recovery on a Path to Net Zero'. The CCPu presents that over 90% of Scotland's electricity comes from renewables, however this achievement must be scaled up to further prioritise renewables as the country makes a wider move towards decarbonisation of other sectors.

4.7.2 A pathway to 2032 is set out by the Scottish Government. As they hope to achieve a 75% reduction in emissions by 2030, there is a focus on prioritising new onshore wind capacity and reviewing the energy consenting process to ensure a smooth transition to renewables for all energy needs.

4.7.3 In December 2021, the CCC published their 10th annual Progress Report to the Scottish Parliament. The report argued that "*promises have not yet turned into action*", as Scotland's climate targets for 2030 and 2045 (a 75% reduction in emissions and an 100% reduction respectively) will be unachievable without significant effort and political transparency. The report urges that, to achieve a minimum of 75% emissions reduction by 2030, there is a huge need for "*rapid progress*" in the form of decarbonisation. The CCC outlines the "*major delivery risks*" in places where ambition is very high; they recommend that there should be greater policy support in order to prioritise renewable energy, decarbonisation, and emissions reductions.

4.7.4 In December 2022, the CCC published the 2022 Report to Scottish Parliament, titled 'Progress in reducing emissions in Scotland', which assessed Scotland's latest progress in emissions reductions. In light of the challenging emissions reductions targets which Scotland faces to reach net zero, the CCC have been closely monitoring their progress against the targets, in terms of policy cooperation, governance, and implementation.

4.7.5 The December 2022 report assesses Scotland's 2022/23 Programme for Government and, in terms of climate policy, presents the fact that there is an aim of 12 GW of onshore wind by 2030 in Scotland. Guided also by the UK Energy Security Strategy, which prioritises onshore wind as a key driver towards energy autonomy, the CCC recommend increased cooperation between the two governments to reach this ambitious 2030 target and the additional targets beyond.

4.7.6 Without onshore wind, and without significant changes to policy and government engagement, the CCC believe that is unlikely that the emissions reductions targets will be achieved. The report states: "*In order to deliver the UK and Scottish Governments' shared interest in delivering ambitious emissions reductions, better coordination and alignment of approaches are needed*". The CCC thus argues that a lack of coordination has undermined, and will continue to undermine, the progress made thus far in reducing domestic emissions and decarbonising the electricity network.

4.7.7 Additionally, the CCC urges stronger cooperation between the Scottish Government and local authorities, so that the local authorities who have declared a 'Climate Emergency' can receive the help they require to combat the consequences of climate change. They urge cooperation in policy and planning matters, particularly in the implementation of NPF4, a document which was assessed in great detail earlier in this AI chapter.

4.7.8 Crucially, the CCC recommends several adjustments to the ambitious climate targets Scotland hopes to achieve, in the hope of reinforcing the integrity of Scotland's climate framework. Slightly adjusting the targets, the CCC claims, will make them significantly more achievable, in line with a new calculating methodology to be introduced in 2023: "*Should the annual targets in the 2020s not be corrected, there is a real risk that the targets being missed every year would undermine the credibility and strength of the Scottish framework for emissions reductions*".

4.7.9 The advisory adjusted targets are not based on the old methodology nor the 2020 target for a 56% reduction in emissions of the 1990 levels. The 2030 target for a 75% reduction in the 1990 level of emissions remains the same. The table below (Figure 1) shows a comparison between the current legislated targets, and the advisory adjusted targets recommended by the CCC in December 2022.

Figure 1 – CCC's Emissions Target Adjustment Recommendations to the Scottish Government

Year	Current Target	Recommended Target
2021	57.9%	51.1%
2022	59.8%	53.8%
2023	61.7%	56.4%
2024	63.6%	59.1%
2025	65.5%	61.7%
2026	67.4%	64.4%
2027	69.3%	67.0%
2028	71.2%	69.7%
2029	73.1%	72.3%

Source: CCC analysis, Scottish Government.

4.8 The AR6 Synthesis Report: Climate Change 2023

4.8.1 In March 2023, the Intergovernmental Panel on Climate Change (IPCC) published the final instalment of their sixth assessment report (AR6), entitled the Synthesis Report (SYR). Throughout its 'sixth assessment cycle', the IPCC have outlined the state of human knowledge on the science of climate change and the progress which has been made against the legal stipulations of the 2015 Paris Agreement. The SYR primarily states that "*human activities, principally through emissions of greenhouse gases, have unequivocally caused global warming*"; in 2019, atmospheric CO_2 concentrations were higher than at any time in the last 2 million years, and concentrations of methane were higher than at any time in the last 800,000 years.

4.8.2 Summarised succinctly for policymakers, the SYR warns of climate overshoot (where global warming increases past the 1.5^{o}C mark before stabilising) if nations and governments around the world do not implement meaningful, whole-system changes. The IPCC outline "*multiple opportunities for scaling up climate action*", and they balance cost with effectiveness and feasibility. In terms of scaling up climate action in the field of global energy supply, wind and solar technologies are highlighted as high-confidence mitigation options, alongside methane reductions from coal and gas. The IPCC strongly urges the scaling-up and harnessing of clean energy in order to substantially reduce our fossil fuel use; this will facilitate our transition to a global net zero CO_2 energy system.

4.8.3 The IPCC warn that, without the scaling-up of these mitigation options, multiple global warming scenarios will have a higher chance of occurring, bringing with it extreme changes in weather patterns, food insecurity, and rising sea levels. The ultimate goal of the IPCC and their assessment reports is to assist governments with achieving "*deep and sustained emissions reductions" and "secure a liveable and sustainable future for all*".

4.9 The Dumfries and Galloway Local Development Plan 2 (2019)

4.9.1 The Dumfries and Galloway Local Development Plan 2 (DGLDP2) was adopted on 3rd October 2019. The Local Plan covers the whole Dumfries and Galloway Council administrative area and is a key material consideration in the determination of applications at this time. The key policies in the DGLDP2 include Policy IN1 ('Renewable Energy'), IN2 ('Wind Energy'), and Map 8 ('Wind Energy Spatial Framework') which identifies the proposed development site as an "*area with potential for wind farm development*".

4.9.2 Policy IN1 ('Renewable Energy') states that the Dumfries and Galloway Council "*will support development proposals for all renewable energy generation and/or storage which are located, sited, and designed appropriately*". This will be determined through an "*assessment of the details of the proposal including its benefits and the extent to which its environmental and cumulative impacts can be satisfactorily addressed*". The acceptability of the proposals will be assessed against a myriad of considerations, including:

- Landscape and visual impact;
- Cumulative impact;
- Impact on local communities and individual dwellings, including visual impact, residential amenity, noise and shadow flicker;
- The impact on natural and historic environment (including cultural heritage and biodiversity;
- The impact on forestry and woodlands;
- The impact on tourism, recreational interests and public access.

4.9.3 Policy IN1 states that, to quantify the acceptability of the proposal, sufficient detail on the scale and nature of the proposal should be submitted, regarding:

- Any associated infrastructure requirements including road and grid connections;
- Environmental and other impacts associated with construction and operational phases of the development;
- Provisions for the restoration of the site;
- Effect on greenhouse gas emissions.

4.9.4 And, crucially:

- The scale of contribution to renewable energy targets;
- Net economic impact, including local and community socio-economic benefits in the form of jobs and business or supply chain opportunities.

4.9.5 Policy IN2 ('Wind Energy') is understandably of particular relevance. Paragraph 4.108 states that policy IN2 sets out "*the issues that will be taken into account for all specific proposals*". Furthermore, paragraph 4.109 details the capacity of different landscapes to accommodate wind energy proposals. Policy IN2 primarily recognises that the Council will support wind energy proposals that are located, sited and designed appropriately. In assessing the acceptability of wind energy proposals, the development proposals will be assessed against the following criteria:

- Renewable energy benefits e.g. the scale of contribution to renewable energy generation targets and opportunities for energy storage;

- Socio-economic benefits e.g. local and community benefits in the form of jobs, employment, and supply chain opportunities;
- Landscape and visual impacts in relation to the capacity of the landscape to accommodate wind energy, and that the design and scale of the proposal is appropriate to its setting;
- Cumulative impact;
- Impact on local communities and residential dwellings, e.g. impacts on residents and local amenity, noise, shadow flicker, and the mitigation proposals associated with these impacts;
- Impact on infrastructure;
- Impact on aviation and defence constraints;
- And a myriad of other considerations e.g. impacts on biodiversity, heritage, tourism, forests and woodland, carbon-rich soils, and hydrology.

4.9.6 The policies in the DGLDP2 which are relevant to this proposal include:

- Policy OP1: Development Considerations;
- Policy OP2: Design Quality of New Development;
- Policy OP3: Developer Contributions;
- Policy ED2: Business Development & Diversification of Rural Areas;
- Policy ED9: Tourism;
- Policy ED11: Dark Skies;
- Policy HE1: Listed Buildings;
- Policy HE2: Conservation Areas;
- Policy HE3: Archaeology;
- Policy HE4: Archaeologically Sensitive Areas;
- Policy HE6: Gardens and Designated Landscapes;
- Policy NE1: National Scenic Areas;
- Policy NE2: Regional Scenic Areas;
- Policy NE3: Wild Land Areas;
- Policy NE5: Species of International Importance;
- Policy NE6: Sites of National Importance for Biodiversity and Geodiversity;
- Policy NE7: Forestry and Woodland;
- Policy NE8: Trees and Development;
- Policy NE11: Supporting the Water Environment;
- Policy NE12: Protection of Water Margins;
- Policy NE14: Carbon Rich Soil;
- Policy NE15: Protection and Restoration of Peat Deposits as Carbon Sinks
- Policy CF4: Access Routes;
- Policy IN1: Renewable Energy;
- Policy IN2: Wind Energy;
- Policy IN8: Surface Water Drainage and Sustainable Drainage Systems (SuDS);
- Policy T1: Transport Infrastructure;
- Policy T2: Location of Development / Accessibility;
- Map 8: Wind Energy Spatial Framework;
- Dumfries and Galloway Council Local Development Plan Supplementary Guidance – Historic Built Environment;
- Dumfries and Galloway Council Local Development Plan 2 Supplementary Guidance – Part 1 Wind Energy Development: Development Management Considerations Appendix 'C' Dumfries and Galloway Wind Farm Landscape Capacity Study.

4.9.7 In November 2022, Dumfries and Galloway Council published their 14th Development Plan Scheme. This document sets out programme and agenda for preparing the next Dumfries and Galloway Local Development Plan (LDP3). The future LDP3 will look ahead to the upcoming decades for Dumfries and Galloway and will be implemented alongside the long-term spatial strategies included in the now-adopted National Planning Framework 4. As NPF4 is now adopted, Dumfries and Galloway Council have 5 years to adopt LDP3.

4.10 Conclusion

4.10.1 To conclude, the Applicant submits that the above policy documents and reports include crucial national planning policy positions in support of the proposed development. Many of these documents were introduced or formally published since the original EIAR application was submitted in November 2020.

4.10.2 Some key points which can be drawn from the documents in support of the proposed Scoop Hill Community Wind Farm development include:

- The centrality of net zero to the Scottish Government's planning policy, and the role which renewable energy will play in achieving Scotland's legally binding emissions targets;
- It is recognised, in the now adopted NPF4 and OWPS, that significant weight is to be placed on the climate emergency, and that the pace of deployment of onshore wind must accelerate to mitigate this emergency;
- The firm ambitions of the Scottish Government in relation to the deployment of onshore wind in Scotland have been formally published, detailing their ambition to reach 20 GW of installed onshore wind by 2030;
- Explicit policy support is given to the co-location of energy storage alongside wind energy developments in Scotland, and the beneficial role that batteries can play in bolstering the flexibility of Scotland's energy supply;

4.10.3 There have been some key developments in Scotland's energy policy in recent years. Amongst others, the positive amendments made in NPF4 and the OWPS serve to provide a firm and supportive foundation for the expansion of renewable energy in Scotland. These policy documents set the direction to 2030, 2045, and beyond, setting the planning balance very much in favour of the established technology of onshore wind, and other nascent renewable energy technologies. Some key positive amendments include:

- The pre-eminence of the climate emergency within NPF4, which is a stark departure from previous planning policy. As Policy 1 of NPF4, 'Tackling the Climate and Nature Crisis', is connected to all other NPF4 policies, this denotes a step change in planning policy in response to the climate change. The matter of weight is no longer left entirely to the discretion of the decision maker;
- The explicit assertion of support for wind farm development in Policy 11, 'Energy', of the approved NPF4 that *"development proposals for all forms of renewable, low-carbon and zero emissions technologies will be supported",* which is a stronger indication of support than the Draft NPF4 which stated that these developments *"should be supported in principle";*
- The minimum target of 20 GW of installed onshore wind capacity in Scotland by 2030, in the adopted Onshore Wind Policy Statement, to guide the overarching ambition of a rapid acceleration of onshore wind as Scotland aims to reach net zero by 2045;
- The assertion throughout NPF4 and OWPS that, despite the impacts of onshore wind, these must be balanced between the clear environmental and economic benefits which onshore wind brings, in terms of job creation, supply chain opportunities, providing green energy for homes, and displacing millions of tonnes of CO_2 from the atmosphere.

4.10.4 Despite these targets and ambitions, key climate bodies such as the CCC, who are tasked with advising the UK Government and devolved governments and parliaments on climate change, claim that not enough has been done. If Scotland hopes to achieve net zero emissions by 2045, the CCC have recommended that the yearly interim targets must be reined in to avoid further target failures. Furthermore, greater action and cooperation is required, particularly in delivering the Scottish Government's ambition of an additional 12 GW of onshore wind by 2030.

4.10.5 The proposed Scoop Hill Community Wind Farm development would contribute 3.6% of the additional 12 GW of onshore wind by 2030 which is desired by the Scottish Government. This contribution could be delivered swiftly, as an adequate grid connection has been secured for the proposed development. The applicant has an agreed grid connection date of August 2025 with a capacity of 500MW. It is listed consistently throughout the now adopted NPF4, and the Dumfries and Galloway LDP2, that the benefits of a development and its contribution to emission reductions targets are crucial in the assessment of its acceptability as a development proposal; Scoop Hill Community Wind Farm would undeniably be a significant step towards the achievement of a 75% reduction in Scotland's emissions by 2030, and ultimately net zero emissions by 2045.

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