

# PROPOSED SINGLE WIND TURBINE AND BATTERY ENERGY STORAGE SYSTEM

LUGGIES KNOWE WIND FARM,  
GREMISTA, LERWICK

SUPPORTING PLANNING  
STATEMENT

NOVEMBER 2023

## 1. **Introduction**

This Supporting Planning Statement has been prepared by Farningham Planning Ltd on behalf of the Applicant **Shetland Aerogenerators Ltd** in support of a planning application for a single wind turbine and an associated battery energy storage system.

It should be read in conjunction with the detailed findings and conclusions of the submitted Environmental Impact Assessment Report (EIAR) prepared by ITP Energised.

Section 25 of the Town and Country Planning (Scotland) Act 1997 (as amended) states that planning applications are to be determined in accordance with the Development Plan unless material considerations indicate otherwise. Following adoption of National Planning Framework 4 on 13 February 2023, the statutory Development Plan for Shetland now comprises the following documents:

- **National Planning Framework 4 (NPF4) 2023;** and
- **Shetland Local Development Plan (SLDP) 2014.**

**NPF4** forms the national element of the statutory Development Plan. It sets out the long-term vision for development and investment across Scotland and has replaced Scottish Planning Policy (SPP) and National Planning Framework 3 (NPF3). This marks a notable change from the status of the now replaced NPF3 and SPP, which did not previously form part of the statutory Development Plan.

The **Shetland Local Development Plan (SLDP)** adopted in September 2014 sets out a Vision and Spatial Strategy including key policies and proposals that provide the land use planning framework to guide development in Shetland up to 2034.

This Statement assesses the proposals against the relevant planning policies contained in NPF4 and the SLDP and refers to relevant energy legislation and policy as it specifically relates to renewable wind energy and battery energy storage systems.

## 2. **Site Description, Planning History, and the Proposed Development**

The proposed development site which extends to circa 66 hectares (ha) is located approximately 1.2 km north of Gremista, Lerwick on the Hill of Gremista. The existing land use includes an operational turbine and access track approved and implemented as part of the 2012 planning permission Ref No 2011/224/PPF which was for three turbines, 121 metres high and associated support infrastructure. Otherwise, the primary land use is occasional rough grazing by sheep.

Access to the site is via an existing junction off the Gremista to Dales Voe Road.

There is industrial infrastructure in the surrounding vicinity including a port facility at Dales Voe to the west and a waste recycling facility to the east.

There are no residential properties within the site boundary. The nearest residential properties are located at South Califf, on the opposite side of Dales Voe approximately ~1.1 km to the west.

The proposed development, which will replace two permitted turbines under the 2012 planning permission which have not been constructed due to issues with neighbouring land uses and engineering reasons, comprises one turbine with a blade tip height of up to 149.9 m with an installed capacity up to 5 MW and a battery energy storage system with up to 12 battery storage containers with an output capacity up to 14.9 MW.

With a total output of 19.9MW, this is significantly greater than the total capacity output of the partly implemented approved scheme of 6.9MW. Based on the capacity factor of the Burradale Wind Farm in Shetland, the annual indicative total power output for the site would be around 22,770 MWh per annum indicating that the proposed development would generate enough electricity to power the equivalent of 6,900 average Scottish households.

### 3. **National Planning Framework 4 (NPF4)**

There are two central themes running through NPF4, namely, addressing the climate emergency and nature crisis. These key themes are reflected in the detailed wording of many policies, as well as their stated 'Intent' and 'Outcomes'. As the Ministerial Foreword notes: -

*"Putting the twin global climate and nature crisis 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".*

The positive contribution that the proposed development can make to addressing these twin themes is set out in the following policy assessment.

#### **Policy 11 – Energy**

This policy is the most relevant to the proposed development. The overall intent of the policy is to *"encourage, promote, and facilitate all forms of renewable energy development onshore and offshore. This includes energy generation and storage".* The policy outcomes are *"expansion of renewable, low-carbon and zero emissions technologies".* (emphasis added)

To achieve these outcomes **Policy 11** states in **part (a)** that *"development proposals for all forms of renewable, low-carbon and zero emissions technologies will be supported".* (emphasis added). This includes in **part (i)** *"wind farms.....and expanding and extending the life of existing wind farms",* in **part (iii)** *"energy storage, such as battery storage"* and in **part (vii)** *"proposals including co-location of these technologies".* (emphasis added)

As highlighted in **Paragraph 5, Page 98, Part 3 Annexes of NPF4**, the proposed development can therefore draw significant support from Policy 11 as a matter of principle.

Based on a principle of £5,000 per installed MW per year, the Applicant anticipates a Community Benefit payment of approximately £25,000 per year arising from the proposed development, once operational. The Applicant is exploring options to route the Community Benefit payment into schemes such as Hjaltland Housing Association's existing Fuel Vouchers scheme, to provide a contribution to reducing fuel poverty for householders in areas known to have higher social deprivation, e.g., Lerwick North.

During the construction phase, socio-economic benefits to the local area are likely to include the following:

- Supply chain opportunities during construction with the aim of maximising local involvement.
- Local labour will be required for civil engineering activities and local contractors will be preferred.
- Specialised teams, including personnel from out with Shetland, will be required for installation of turbine components. This will require the provision of accommodation, food, machine hire, etc. for visiting contractors.
- Specialised haulage firms will be required, with local options being preferred.
- Local companies will be used for component offload, storage, and transport from base to site.

The production of wind turbine tower, blades and internal components is expected to take place within the wider UK and Europe, due to low level manufacturing capabilities within Shetland.

During the operational phase, socio-economic benefits to the local area are likely to include the following:

- Direct full-time employment of management and engineering teams by the Applicant to support the operation and maintenance of the proposed development over its lifetime.
- New job opportunities benefitting individuals through income and skills, with indirect benefits to the local area through salary spend.
- An increased number of training opportunities being made available to local people.
- Land rental payments to landowners and crofters in the affected area.
- Business rates and local engineering supply chain opportunities.

It is therefore considered that consistent with **Policy 11 (c)** and to a degree **Policy 25 – Community Wealth Building**, the Applicant has done what it can at this stage in the process of the proposed development to try and maximise the net economic impact that is likely to arise including local and community socio-economic benefits such as employment, associated business, and supply chain opportunities.

**Part (e)** of **Policy 11** sets out a list of criteria to be considered in the assessment of renewable energy proposals. As far as they relate to renewable wind energy and battery storage, as highlighted in the detailed assessments and conclusions that form an integral part of the submitted EIAR, it is considered that the proposals for the application site compare favourably as follows:

- i. Noise impacts associated with the construction and operation of the proposed development at the closest noise sensitive receptors will not be significant and no potential vibration effects have been identified.
- ii. As stated in this section of the policy, significant landscape, and visual impacts “*are to be expected for some forms of renewable energy,*” but that “*where impacts are localised....., they will generally be considered acceptable*”. Several significant effects are predicted including that on the landscape character of the site and its surroundings, and visual effects on residents at settlements and tourists including recreational walkers. The

proposed development will also be observed from approaching ships and ferries. These significant effects are however localised.

The well-defined visual compartment of Dales Voe, bound inland by several ridges and hills, and the northern parts of Bressay is considered to have attributes which are suited to wind farm development, as recognised in the Landscape Sensitivity and Capacity Study for Wind Farm Development in the Shetland Islands (Land Use Consultants, 2009). The proposed development takes advantage of the screening properties of these adjoining ridgelines that reduce detrimental effects on the adjacent National Scenic Area.

The proposed development is focused away from the scattered settlement and coastal crofting land and sited away from the more sensitive coastal edge and set back on higher ground. The proposed development will be seen in association with existing areas of development at Gremista and in local views in association with the former quarry and dismantling yard at Dales Voe. Whilst the effects will be significant at and around the site, and for some visual receptors in and around Lerwick, it is considered that these can be accommodated within this developed landscape, and that any significant effects are localised.

- iii. There will be no impacts on public access, long distance walking, cycle, and scenic routes.
- iv. There will be no impacts on aviation and defence interests.
- v. There will be no impacts on telecommunications and broadcasting installations.
- vi. Operational and construction traffic movements will be extremely low. The proposed development will be accessed from the existing access junction for the current operational turbine, off the Gremista to Dales Voe Road. To construct the proposed development, bulk materials such as concrete and rock will be imported to the site from local sources. The turbine components will arrive to Greenhead port terminal, Shetland by sea and will be transported to the site via Gremista road for approximately 1 km.

The findings of the transport assessment which accompanied the 2012 planning permission remain relevant for both the construction and operational phases of the proposed development. It found no anticipated significant effects because of the traffic associated with the construction or operation of the Gremista Wind Farm. It is assumed the levels of traffic associated with the proposed development would be the same as those predicted within the Environmental Statement for the 2012 planning permission and therefore, no significant effects would occur.

- vii. Four known heritage assets have been identified within the proposed site. The proposed development has been designed to avoid all known remains and their settings. There will be no impacts or significant effects on the historic environment.

- viii. There will be no adverse impacts on hydrology and the water environment. Flood risk is not an issue.
- ix. The existing site is made up largely of blanket mire and dry heath. There are no protected species such as otters utilising the proposed site and only a limited number of birds such as snipe and great skua use the site for breeding/nesting purposes. Through a mixture of standard mitigation measures including avoiding construction during the breeding/nesting season and reducing impacts on birds such as red-throated diver, curlew, great skua, great black-backed gull and herring gull through collision risk, predicted effects will not be significant. There are however significant opportunities for biodiversity enhancement. These are highlighted below as part of the specific NPF4 Policy 3 Biodiversity assessment.
- x. There will be no impact on trees, woods, and forests.
- xi. Given the small-scale nature of the proposal, a decommissioning and site restoration plan could be satisfactorily addressed by way of a suitably worded planning condition as per the extant planning permission (Condition 5).
- xii. Given the small-scale nature of the proposal, the detail of financial arrangements to secure any ultimate decommissioning and restoration of the site could be satisfactorily addressed by way of a suitably worded planning condition as per the extant planning permission (Condition 6).
- xiii. There are no significant cumulative impacts resulting from the addition of the proposed development.

It is hugely significant to note that at the end of the assessment criterion in **part (e)** after **part (xiii)**, **Policy 11** states that: -

*“In considering these impacts, significant weight will be placed on the contribution of the proposal to renewable energy generation targets and on greenhouse gas emission reduction targets”.* (emphasis added)

In established planning practice and law, it was previously at the discretion of individual decision makers about what weight they decided to give to a particular matter as a material planning consideration in the planning balance.

However, **Policy 11** now explicitly states that as a matter of national planning policy, they must give significant weight to the renewable energy benefits of a scheme as part of any balanced planning assessment.

#### **Policy 1 – Tackling the Climate and Nature Crises**

**Policy 1** states that *“when considering all development proposals significant weight will be given to the global climate and nature crises”.* (emphasis added) The intent of **Policy 1** is *“to encourage, promote and facilitate development that addresses the global climate emergency and nature crisis”.* The policy outcomes are *“zero carbon, nature positive places”.*

This policy applies to all forms of development and not just renewable energy proposals. The reference to the need to give *'significant weight'* to the global climate and nature crises in this overarching policy aligns with but goes further than Policy 11, which does not specifically mention the nature crisis. This overarching policy shows the seriousness with which Ministers are treating these two fundamental issues.

The language of this overarching policy is very clear. Combined with the Policy Intent and Policy Outcomes, there can be no doubt about what this policy is designed to achieve and what it requires of decision makers. While the loss of the SPP 'presumption' from NPF4 may be noted, the language used in Policy 1 makes it clear that there is no longer any discretion about what weight should be given to these matters in the planning balance, and this marks a notable and significant shift in national planning policy.

It is already evident from recent Ministerial decisions that NPF4 is a 'game changer'. In both the Clashindarroch II Wind Farm and Shepherd's Rig Wind Farm cases, original pre-NPF4 recommendations to refuse Section 36 consent for these two projects by the Reporters were amended by the same Reporters following consideration of NPF4. In both cases, Reporters referenced the need to give 'significant weight' to the aforementioned issues, which ultimately resulted in them changing their assessments of each scheme in the planning balance. In both cases, Scottish Ministers accepted the recommendation to grant consent.

The proposed development will generate around 19.9MW of renewable electricity, supported by a battery storage area, which will help meet the Scottish Government's renewable energy generation targets in the post 2020 period and the net zero legal obligations by 2045, as well as the key interim 2030 target of a 75% reduction (noting that the proposed development already has a grid connection).

In addition, a Biodiversity Enhancement Plan has been prepared which outlines a series of proposed enhancement measures, over and above those required to mitigate the effects of the proposed development, all in accordance with NPF4 Policy 3 which is discussed further below.

With respect to the nature crisis, the findings of EIA Report Chapters 6: 'Ecology' and 7: 'Ornithology' are relevant. These assessments have concluded that, assuming the proposed embedded mitigation measures are implemented effectively, and best practice measures are adhered to, there will be no residual adverse significant effects on any ornithological or ecological receptors during the construction, operation and decommissioning of the proposed development.

Overall, the proposed development is consistent with the Intent and Outcomes of Policy 1.

### **Policy 2 – Climate Mitigation and Adaption**

The intent of **Policy 2** is *"to encourage, promote and facilitate development that minimises emissions and adapts to the current and future impacts of climate change"*. The policy outcomes are that *"emissions from development are minimised and our places are more resilient to climate change impacts"*.

The proposal is consistent with the Intent and Outcomes of Policy 2 as it involves the generation and efficient management of low carbon green energy from renewable sources. Additionally, the design and siting of the proposed development has sought to ensure that risks associated with climate change (e.g. flooding) are avoided.

### **Policy 3 – Biodiversity**

The intent of **Policy 3** is “to protect biodiversity, reverse biodiversity loss, deliver positive benefits from development and strengthen nature networks”.

It sets out a range of criteria that vary depending upon the scale and type of development proposed. **Part (a)** applies to all scales of development and states that proposals will contribute to the enhancement of biodiversity including, *inter alia*, restoring degraded habitats and building and strengthening nature networks and the connections between them.

**Part (b)** which in part relates to development proposals that require an Environmental Impact Assessment, states that such proposals will only be supported where it can be demonstrated that the proposal will conserve, restore, and enhance biodiversity, including nature networks so they are in a demonstrably better state than without intervention.

Despite the small-scale nature of the proposed site and associated proposal, in compliance with **Policy 3**, there are opportunities for biodiversity enhancement which will be delivered through the implementation of a Biodiversity Enhancement Plan which accompanies the planning application, the aims of which include restoring, enhancing and managing areas of blanket bog habitats that show signs of degradation and erosion, as well as converting areas of acid grassland to blanket bog, and installing wildlife friendly features to support locally important species.

The aim is to not merely compensate for adverse impacts that the proposed development may have on habitats and species of conservation interest, but to deliver an overall gain in biodiversity in the years following construction of the proposed development.

The restoration and enhancement measures proposed align with NatureScot guidance in that the BEP aims to restore an area of priority peatland habitat more than ten times the area to be lost plus 10% for enhancement. The area of blanket bog expected to be directly lost due to the proposed development is 0.64 ha (with an additional indirect loss of 1.04 ha) giving a total of 1.68 ha. The area proposed for restoration and enhancement is up to potentially 92.71 ha, the specific spatial extent of achievable restoration within that area being subject to a more detailed future assessment. This restoration will aim to connect the areas of degraded mire by filling in the boundaries, drains and hags that separate a single contiguous area of active peat and create additional blanket bog from areas of acid grassland on deeper peat that were previously blanket bog or wet heath.

Additional biodiversity enhancement will be provided using temporary fencing for reduced grazing, scrub and bracken control and bug hotels to support bumblebees and a variety of other invertebrates.

Significantly, the extant planning permission, if fully implemented, would result in a direct loss of 0.25 ha of wet modified bog with further indirect losses and no committed restoration measures or enhancement. By comparison, the current proposal would result in a substantial biodiversity enhancement.

### **Policy 4 – Natural Places**

This policy sets out the basis for assessing applications that affect European natural heritage designations such as Special Protection Areas, as well as proposals affecting National Parks,



National Scenic Areas, Sites of Special Scientific Interest and local level natural heritage and landscape designations.

The proposal has no direct adverse impacts on a Special Area of Conservation (SAC), Special Protection Area (SPA), Ramsar Site, National Scenic Area (NSA), National Nature Reserve (NNR), a Site of Special Scientific Interest (SSSI), Local Nature Conservation Site or Local Landscape Area.

#### **Policy 5 – Soils**

**Part c) ii** of **Policy 5 supports** (emphasis added) *“the generation of energy from renewable sources that optimises the contribution of the area to greenhouse gas emissions reductions targets”*. In accordance with **parts a) and d)** of the policy, the proposal has been designed to minimise disturbance to soils in general and particularly areas of deep peat and, through the preparation of a Peat Management Plan and a Biodiversity Enhancement Plan which collectively aim to reduce the potential impacts on peat resources and restore degraded peatland habit, the residual effects on peat resources will be negligible to minor and therefore not significant.

#### **Policy 7 – Historic Assets and Places**

The proposed development will have no direct impact and no significant indirect impact on any historical assets such as Listed Buildings or Scheduled Monuments.

#### **Policy 22 – Flood Risk and Water Management**

There are no flood risk issues associated with the proposed development.

#### **Policy 29 – Rural Development**

This policy states development proposals that contribute to the viability, sustainability and diversity of rural communities and the local rural economy will be supported (emphasis added) including “Essential Infrastructure” which is defined in **NPF4’s Annex F – Glossary of Definitions** as including “all forms of renewable, low-carbon and zero emission technologies for electricity generation and distribution”.

#### **4. Shetland Local Development Plan (SLDP) 2014**

Climate change issues are embedded in all aspects of the **SLDP**. Although there is not a specific chapter covering the subject, **Policy GP1 Sustainable Development** clearly states that *“tackling climate change and associated risks is a major consideration for all development”* and emphasises *“the need to help mitigate and adapt to the causes of climate change”*.

The proposed site falls within an area of the open countryside where the physical land use principle of generating renewable wind energy is already established on account of the extant planning permission Ref No 2011/224/PPF approved in 2012 and part implemented in 2015.

It is acknowledged that the 2012 permission was determined within the context of the then statutory Development Plan which was made up of the now superseded **Shetland Structure Plan 2000** and the **Shetland Islands Local Plan 2004**.

However, a review of the Planning Officer’s Delegated Planning Report which accompanied approval of the original renewable wind energy scheme on the site, clearly demonstrates that

although some of the detail and terminology of the various planning policies that prevailed at the time may have changed, the general thrust of policy was very similar to those policies which form part of the current SLDP which advocates strong support for renewable wind energy subject to avoiding unacceptable significant environmental impacts.

**Policy RE1 Renewable Energy supports** (emphasis added) all types of renewable energy development proposals where it can be demonstrated that there will be no unacceptable impacts on people, the natural and water environment, landscape, historic environment and the built environment and cultural heritage of Shetland.

The following policies which are very similar in tone and objectives to those policies contained in NPF4, are aimed at protecting valuable environmental assets:

- **Policy NH1 International and National Designations**
- **Policy NH2 Protected Species**
- **Policy NH3 Furthering the Conservation of Biodiversity**
- **Policy NH4 Local Designations**
- **Policy NH5 Soils**
- **Policy NH6 Geodiversity**
- **Policy NH7 Water Environment**
- **Policy HE1 Historic Environment**
- **Policy HE4 Archaeology**

As highlighted above as part of the NPF4 policy assessment and as clearly demonstrated in the detailed assessments and conclusions of the various topic chapters in the submitted EIAR, the proposal will have no unacceptable impacts on areas of acknowledged planning importance and therefore, has very strong policy support.

## 5. **Other Material Considerations**

### **Energy Legislation & Policy**

The 21st session of the Conference of Parties (COP21) was held in Paris in February 2015. The Paris Agreement, as it is commonly referred to, was negotiated by representatives of 196 countries. It sets out the ambition of holding the increase of global average temperature to “*well below 2°C*” by the end of the century and pursuing efforts to limit temperature increases to 1.5°C. This ambition has been consistently reaffirmed, most recently at COP27 in Egypt in November 2022.

For more than a decade, the UN Gap Reports have compared where GHG emissions are heading against where they need to be, and highlights ways to close the gap. The latest Gap Report, ‘Broken Record – Temperatures hit new highs, yet world fails to cut emissions (again)’ was published in November 2023. It states that the world is setting alarming emissions and temperature records and is on track for a global temperature rise of between 2.5°C - 2.9°C by the end of this century. To keep global warming below 1.5°C, the aspirational goal of the Paris Agreement, the report states that the world needs to cut predicted GHG emissions in 2030 by 42%.

The Scottish Government first declared a 'climate emergency' in April 2019 and passed the Climate Change (Emissions Reduction Targets) (Scotland) Act 2019, which amends the Climate Change (Scotland) Act 2009 and sets a target for a 100% reduction in GHG (including CO<sub>2</sub>) emissions by 2045, with an interim target of a 75% reduction by 2030 (relative to 1990 levels).

The Scottish Government GHG emissions statistics for 2021 were published in June 2023 and show that for the eighth time in 12 years the annual target has been missed. Much more needs to be done if we are to meet the next key milestone of a 75% reduction in GHG emissions by 2030.

Published in December 2022, the Climate Change Committee reports entitled 'First Yearly Review & Progress in Reducing Emissions in Scotland – 2022 Report to Parliament' provide the Scottish Ministers with advice on Scottish GHG emission targets and assess progress on reducing emissions to date. There are several key messages including that *inter alia* meeting the 2030 interim target remains extremely challenging. The analysis suggests that a 65-67% reduction in emissions is feasible. Policies must therefore go further to meet the legislated 75% reduction by 2030.

The 'Onshore Wind Policy Statement' (OWPS) was published by the Scottish Government in December 2022. It quantifies the amount of new onshore wind that is needed to meet GHG reduction targets and notes in the Ministerial Foreword that there is an "*ambition of 20GW of onshore wind capacity in Scotland by 2030*" to encourage decarbonisation of the energy system.

OWPS Paragraph 3.5.6 recognises that as an "*essential part of our energy mix*", onshore wind deployment will increase in the coming years, providing further opportunities for the sector to contribute significantly to biodiversity ambitions. In the commentary on peat and carbon-rich soils, the OWPS notes that reversing degradation of peat through peatland restoration is central to mitigating and adapting to the linked climate and nature crises.

In Section 3.6, the OWPS discusses landscape and visual matters and links with NPF4. OWPS Paragraph 3.6.1 notes that to ensure climate change targets are met, taller and more efficient turbines will be required and that "*this will change the landscape*" (no emphasis added). This point is also recognised in Policy 11(e)(ii) of NPF4. Not all renewable energy projects will receive permission however, and the OPWS confirms in paragraph 3.6.1 that the aspiration is to ensure "*the right development happens in the right place.*"

In relation to the energy storage element of the proposed development, the OWPS recognises that co-location of such facilities with onshore wind helps to balance electricity demand and supply while adding resilience to the energy system. In this respect, "*on-site battery storage not only reduces pressures from the grid, but enables more locally focussed energy provision, and reduces costs to consumers*" (OWPS Paragraph 8.4.5).

Importantly, the OWPS states in paragraph 3.6.2 that "*stronger weight*" (emphasis added) is now to be given to the contribution of a development to the climate emergency in the planning balance, as well as community benefits. The OWPS does not just want developers to deliver onshore wind energy in isolation. Proposals need to maximise the economic, social and environmental benefits too, to help the just transition to a net zero society.

The 'Scottish Energy Strategy' (SES) published in December 2017 sets out the Scottish Government's strategy through to 2050, marking a 'major transition' over the next three decades in terms of energy management, demand reduction and generation.

SES Page 41 notes that renewable and low carbon energy will provide the foundation of our future energy system, offering Scotland a huge opportunity for economic and industrial growth. While the SES acknowledges that all renewable energy technologies will have a role to play in the future

energy system, the nature of the energy and climate change goals means 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”* (page 43) (emphasis added).

The Scottish Government published the ‘Draft Energy Strategy & Just Transition Plan’ (the Draft SES) for consultation purposes in January 2023.

The Ministerial Foreword describes the 2020s as a *“decisive decade”* when we must deliver an energy system that meets the challenge of becoming a net zero nation by 2045. It notes the need to reduce dependency on oil and gas, as a means of combating the climate crisis and reducing our exposure to global market volatility in the energy market, which has seen energy prices increase significantly since the start of the Ukraine war in 2022.

Draft SES Section 3.1 notes that *“increasing levels of home-grown renewable supply will make energy more affordable and ensure it is always available when we need it.”* The Draft SES is not technology specific and there are comments, aspirations and targets for different technology types. The Draft SES sees onshore wind as playing a key role in meeting the target of an additional 20GW of renewable energy capacity by 2030. In this respect, onshore wind is expected to provide 12GW of this additional capacity and the Draft SES notes at paragraph 3.1.2 that *“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. There are also substantial opportunities associated with repowering onshore wind farms as they come to the end of their lives.”*

In Section 3.2 'Reducing Our Reliance on Other Energy Sources', the Draft SES notes that the Scottish Government wishes to ensure the fastest possible transition from dependence on a fossil fuel energy system to one that maximises the value we obtain from Scotland's rich and varied renewable energy resource. This section references NPF4 and states that the Scottish Government will encourage, promote and facilitate all forms of renewable energy development, both onshore and offshore.

## **6. Conclusions**

As set out in the Scottish Government documents discussed above in Section 5 of this Statement, the production of green renewable wind energy and associated battery storage has a critical role to play in delivering Scotland's target of net zero greenhouse gas emissions by 2045.

The potential for significant environmental effects associated with the construction and operational phases of the proposed development have been fully considered including landscape and visual impacts, impacts on residential receptors; impacts on the local road network arising from construction and operational traffic generation; impacts upon ecology and ornithology; impacts arising from noise and vibration, impacts on geology, hydrology, hydrogeology and peat, impacts on aviation and telecommunication systems and impacts upon cultural heritage interests.

Apart from landscape and visual impacts which are predicted to be significant but only localised and ornithological, peat and water management impacts which are predicted not to be significant with the application of appropriate mitigation measures as proposed, there are either no predicted impacts or impacts are not significant on account of the proposed development.

Coupled with the local economic community benefits and the commitment to biodiversity enhancement arising from the proposals, these findings have allowed for a positive assessment to be made against the determining criteria set out in NPF4 Policy 11 which is the most relevant and up-to-date Development Plan policy against which to assess the proposed development.

The assessments set out above in Sections 3 and 4 in respect of other relevant planning policies in both NPF4 and the SLDP, clearly demonstrate that there are no policy conflicts that would detract from the strong support that the proposed development draws from NPF4 Policy 11 and the various energy publications set out in Section 5.

Section 25 of the Town and Country Planning (Scotland) Act 1997 (as amended) states that planning applications are to be determined in accordance with the Development Plan unless material considerations indicate otherwise. As of 13 February 2023, NPF4 now forms part of the Development Plan. Decisions on individual planning applications must therefore give NPF4 significant weight against proposals that positively contribute to reducing greenhouse gas emissions and contributing towards renewable energy generation targets.

If Scotland is to meet its challenging 2045 net zero target, the proposed development is exactly the type of project that is being encouraged by the Scottish Government through the various renewable energy publications discussed in Section 5 of this Statement and NPF4.

The production of green renewable energy is already firmly established at the proposed site on account of the extant planning permission Ref No 2011/224/PPF approved in 2012 and part implemented in 2015. This amended proposal which aims to increase the site's output from the permitted 6.9 MW per year to 19.9MW, clearly complies with the relevant provisions of the Development Plan and benefits from the extraordinarily strong planning policy support in its favour. In addition, it is hugely supported by other material considerations in the form of Scottish Government energy legislation and policy. Accordingly, it is respectfully suggested that planning permission should be granted.

**Farningham Planning Ltd**  
**Town Planning Consultants**  
**November 2023**