

# PLANNING STATEMENT

**Uisenis Wind Farm**

Prepared for: Uisenis Power Limited

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## Executive Summary

### Introduction

Uisenis Power Limited ('the applicant') proposes to construct and operate a 25 wind turbine wind farm, ('the proposed development') at a location within the Eisgein (Eishken) Estate on the Isle of Lewis (the Site). The proposed development would be known as Uisenis Wind Farm. This Planning Statement has been prepared on behalf of the applicant to accompany an application under Section 36 of the Electricity Act 1989 for the construction and operation of the proposed development.

The proposed development would comprise of 25 wind turbines with blade tip heights of up to 200m and associated ancillary infrastructure. Based upon the proposed turbine tip heights (22 turbines at 200m, 3 turbines at 180m) it is anticipated that the installed nominal capacity of each wind turbine will be approximately 6.6MW, giving a total installed capacity of 165MW. Assuming a capacity factor of 40%, the annual generation from the proposed wind turbines is estimated at approximately 578,160 Megawatt hours (MWh). This would supply renewable electricity equivalent to the approximate annual domestic needs of up to 164,764 UK households<sup>1</sup>.

### Site Selection and Proposed Layout

The location for Uisenis Wind Farm has been selected for a number of reasons. It benefits from high wind speeds, is located entirely outwith any statutory designations, is located (turbine area) in excess of 2km from the nearest settlements, and the appropriateness of the Site for wind farm development has been established through the consented Muaitheabhal Wind Farm (and extensions). Key environmental effects as assessed in the Environmental Impact Assessment (EIA) Report are predominantly in relation to landscape and visual matters, specifically the location of the proposed development in a sensitive area (with Wild Land Areas and a National Scenic Area located nearby); and effects on birds, primarily Golden and White-Tailed eagle. The iterative design process of the proposed development, which takes into account the findings of the EIA, has considered these landscape and visual, and ornithological challenges (as well as many other environmental considerations), and attempted to reduce potential negative effects where possible. As a result, the layout of the proposed development has sought to locate turbines away from ridges and high points, and also keep turbines away from known bird nesting sites. Further to this, in comparison to the consented Muaitheabhal Wind Farm (and extensions), the number of wind turbines proposed has reduced from 45 to 25, which has allowed design effort to reduce effects on peat and soils, and allow for a layout that appears more balanced (less turbine stacking) from key viewpoints. Despite there being 20 fewer turbines than the consented Muaitheabhal Wind Farm (and extensions), the installed capacity of the proposed development would be approximately 3MW larger, at 165MW compared to 162MW. This is due to the turbine tip heights of the proposed development being between 30m and 70m taller (130m/145m/150m v 180m/200m). Further to this, due to the proposed development having larger, more efficient turbines and a higher site specific capacity factor, the discrepancy in output would likely be even greater when considering the MWh produced by both schemes. The final layout of the proposed development is therefore considered to make best use of the Site and its wind resources and is considered to be appropriate for this location.

### Policy and Targets

Both UK and Scottish Government legislation and energy policy have for some considerable time provided a strong commitment to renewable energy and a reduction in greenhouse gas emissions in order to seek to tackle climate change. However, there is now growing consensus on the severity of climate change, including the impacts that climate change is already having here in the UK and Scotland and across the world. Amendments to the Climate Change (Scotland) Act 2009 have been made by the Scottish Government as a result, which recognise the urgent response that is required. These amendments commit Scotland to a target of net zero

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<sup>1</sup> Calculated using the most recent statistics from the Department of Business, Energy and Industrial Strategy (BEIS) showing that annual UK average domestic household consumption in 2022 was 3,509kWh

emissions of all greenhouse gases by 2045, with interim targets for reductions of at least 56% by 2020, 75% by 2030 and 90% by 2040. To help ensure the delivery of the long term targets, statutory annual targets for every year to net zero have also been set. For each year up to and including 2020, the annual percentage reduction required was 1%. Scottish Government statistics show that this target was missed for three consecutive years for the years 2017, 2018 and 2019. Whilst this target was hit for 2020, this was primarily due to the reduction in emissions as a result of the lockdowns imposed for the COVID-19 pandemic and is only likely to be transitory. For each year between 2020 and 2030, the annual percentage reduction increases to 1.9%, a near doubling of the response. If the early targets to 2020 are not being met, the scale of change required over the next decade to meet the more challenging targets is therefore starkly clear.

In addition to these new legislative targets, there has also been a step change in UK and Scottish energy policy of the need for rapidly increased deployment of renewable electricity over the next decade to reduce greenhouse gas emissions if the worst consequences of climate change are to be avoided. Furthermore, recent events with the war in Ukraine and rapidly rising energy prices have shed a spotlight once again on the importance of having greater security over future energy supplies and the importance of generating more energy domestically.

### *Consenting Regime*

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

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

The Outer Hebrides Local Development Plan (2018) is already strongly supportive of new renewable energy projects, however as NPF4 now forms part of the local development plan, this support in the Planning Policy is further enhanced.

### *Summary of Benefits*

In terms of the benefits of the proposed development there are several, ranging from contributing to renewable energy targets to providing economic benefits for the local community, Scotland and the UK.

If consented, the proposed development is predicted, during the construction phase, to generate approximately £3.19 million of Gross Value Added (GVA) for the Western Isles and a further £15.92 million GVA to the wider Scottish economy. The construction phase of the proposed development is predicted to support (directly and indirectly) approximately 49.7 full time equivalent jobs locally (across the Western Isles), and a further 231.8 full time equivalent jobs across Scotland. The operational phase of the proposed development is predicted to support (directly and indirectly) approximately 30 full time equivalent jobs locally (across the Western Isles).

The Scottish Government's latest carbon calculator indicates that the proposed development will pay back the carbon emissions associated with its construction, operation and decommissioning in approximately 1.5 years (assuming replacement of a fossil fuel mix of electricity generation).

The proposed development also includes proposals for habitat restoration and biodiversity enhancements through blanket bog restoration which are committed to via an outline Habitat Management Plan (HMP). This restoration and enhancement would see an area of 50ha fenced off and managed as blanket bog habitat –

considerably more than would be lost through proposed infrastructure and also more than committed to in the as part of the existing consent.

### *Conclusion*

This Site already has consent for a large-scale commercial wind farm(s) and as such the principle of a wind farm being acceptable in this location has already been established. Utilising new turbine technologies, the proposed development would provide a greater scale of energy production, with fewer turbines and on a smaller Site footprint than the currently consented scheme.

It is submitted that the proposed development would provide significant climate change and renewable energy benefits as well as positive socio-economic benefits at a local and national level. Significant weight should also be given to the legally binding targets in the Climate Change (Scotland) Act 2009 (as amended by the Climate Change (Emissions Reductions Targets) (Scotland) Act 2019) and net zero related pronouncement when determining applications, with the need case for renewable energy development made abundantly clear through local and national policy, targets and law. The associated urgency of the need for carbon reduction measures including renewable energy development has also been brought to the fore through the recent adoption of NPF4 and the Onshore Wind Policy Statement 2022 – without a step change in the number and speed of renewable energy consents in Scotland, the targets for renewable energy production by 2030, or our overall net zero target for 2045 will not be met.

The proposal for which consent is being sought is therefore considered, on balance, to be acceptable in relation to Schedule 9 of the Electricity Act 1989 and other key material considerations, when the likely residual significant effects (landscape and visual amenity only) are weighed against the anticipated positive benefits of the proposed development. It is therefore concluded that the planning balance lies firmly in favour of the proposed development.

## 1.0 Introduction

### 1.1 The Application

1. This Planning Statement has been prepared on behalf of Uisenis Power Limited to accompany an application under Section 36 of the Electricity Act 1989 for the construction and operation of a wind farm (25 wind turbines with a total installed capacity of 165MW) located within the Eisgein (Eishken) Estate, approximately 20km south west of Stornoway, Isle of Lewis (herein after referred to as the 'proposed development'). The application site (herein after referred to as 'the Site') lies wholly within the administrative boundary of Comhairle nan Eilean Siar (CnES), Western Isles Council. The proposed development would be known as Uisenis Wind Farm and would be centred on National Grid Reference (NGR) NB 31366 12772, as shown on **Figure 1**.
2. In addition to the application for consent in terms of section 36 of the Electricity Act a request is also being made that a direction be issued under section 57(2) of the Town and Country Planning (Scotland) Act 1997 that planning permission be deemed to be granted.
3. The proposed development constitutes a Schedule 2 development under the Electricity Works (Environmental Impact Assessment) (Scotland) Regulations 2017. An EIA has been carried out and the application is accompanied by an Environmental Impact Assessment (EIA) Report. This Planning Statement does not form part of the EIA Report. However, reference is made to the conclusions of the EIA Report in assessing the acceptability of the proposals.

### 1.2 The Applicant

4. The applicant is Uisenis Power Limited ('the applicant'), which is a wholly owned subsidiary of Eurowind Energy A/S.
5. Eurowind Energy A/S was established in 2006 and is one of Europe's leading renewable energy companies. With a head office in Hobro Denmark, EWE employs approximately 400 staff across 14 countries. EWE is 50% owned by Holdings Aps and 50% by Norlys. Norlys is Denmark's largest integrated energy and telecom group with more than 700,000 shareholders and 2,500 employees.
6. EWE develop, construct, and operate wind, solar photovoltaic and 'Power to X' assets across Europe and in the USA. As of November 2021, EWE owned 758MW of operational renewable assets and held under asset management a portfolio of 1,518MW. The Company has a growing development pipeline of 19,370MW which is anticipated to deliver 300MW per year into ownership and 550MW into asset management over the next few years. Currently the business is adding one new Country per year to its development business and is on target to meet a 2025 target of 2,000 operational MW in ownership and 4,000MW in asset management. EWE employs an experienced UK team based in Glasgow that was established in 2021. EWE UK has one constructed, soon to be operational, windfarm at Howpark in The Scottish Borders and has a growing development portfolio of around 500MW in addition to the Uisenis Wind Farm.

### 1.3 Purpose of this Planning Statement

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

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

8. This Planning Statement is structured as follows:

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

## 2.0 The Proposed Development

### 2.1 The Site and Surroundings

#### 2.1.1 The Site

9. The Site, centred on NGR NB 31366 12772, is located within the Eishken Estate on the Isle of Lewis and is entirely within the administrative boundary of CnES (**Figure 1**). The Site is located in the north of the Pairc peninsula. The peninsula is defined by two long and narrow sea lochs, Loch Erisort (Eireasort) to the north, and Loch Seaforth (Shiophoirt) to the south, the latter forming part of the boundary between Lewis and Harris.
10. The area within the Site, which measures approximately 1,429.4ha, is currently utilised recreationally for hunting, fishing and deer stalking for residents of, and visitors to, the Eishken Estate Lodge (also located within the application boundary). The lodge is available for hire as luxury sporting accommodation. Predominant land cover within the Site is heather grassland interspersed with freshwater lochans and a network of tributaries. The Site boundary also encompasses a number of small lochs with a number of rivers and streams crossing the Site feeding into the lochs.
11. The Site is characterised by gently rolling open moorland with some areas of steep slopes and rocky outcrops, particularly in the west of the Site. There are numerous lochans and watercourses across the Site, draining to Loch Seaforth to the north and west and Loch Sealg to the south. The Site comprises numerous ridges and elevated landform, including the summits of Creag na Beirighe (236m AOD) and Cleit Catriona (139m AOD) in the south of the Site. Topography rises from sea level in the south, reaching a high point of approximately 270m AOD in the north west. The summits of Feiriosbhal (327m AOD), Cleit na Cerdaich (168m AOD) and Beinn Mheadhanach (288m AOD) are located outside of the Site boundary but are within close proximity to the north western Site boundary.
12. The Site boundary encompasses the Eishken Road which runs from the Eishken Lodge to the A859. The entirety of this road is included in the Site boundary in order to allow for widening and other improvements which would facilitate abnormal loads and other HGV's using it to access the main part of the Site.
13. There are no statutory designated sites located within the Site boundary.

#### 2.1.2 The Surroundings

14. The following are the closest (within 10km) statutory environmental designated sites to the Site boundary:
  - South Lewis, Harris and North Uist National Scenic Area (NSA) – approximately 2.6km to the south of the Site at its nearest point;
  - Wild Land Area 31: Eisgein – directly abuts the south western boundary of the Site;
  - Loch Seaforth Marine Conservation Area – approximately 60m to the west of the Site at its nearest point;
  - Wild Land Area 30: Harris-Uig Hills – approximately 1.2km to the west of the Site at its nearest point;
  - Lewis Peatlands Special Protection Area (SPA) – approximately 954m to the north west of the Site at its nearest point;
  - Lewis Peatlands RAMSAR site – approximately 954m to the north west of the Site at its nearest point;

- Lewis Peatlands Special Area of Conservation (SAC) – approximately 3.6km to the north west of the Site at its nearest point;
  - Inner Hebrides and the Minches SAC – approximately 5.5km to the south east of the Site at its nearest point;
  - Loch nan Eilean Valley Bog Site of Special Scientific Interest (SSSI) – approximately 4.2km to the north west of the Site at its nearest point; and
  - Achmore Bog SSSI – Approximately 8.3km to the north of the Site at its nearest point.
15. The immediate surrounding area is remote, and residential dwellings are restricted to the Eishken Lodge and inner estate. Beyond this there are only isolated residential properties, typically isolated crofts, located within the adjacent estate to the north and east (Pairc Estate).
16. The nearest settlements are to the north and east of the Site, where the Park (Pairc) peninsula adjoins the rest of the island: Arivruch (Airidh a Bhruaich) and Balallan (Baile Ailein) on the A859 road, as well as small crofting townships along the B8060 road to the north and east (between Habost and Orinsay). There are no core paths or Public Rights of Way (PRoW) for a significant distance, the closest located is approximately 9.7km west of the Site.
17. Stornoway is located approximately 20km north east of the Site, and Tarbert located approximately 17.9km south west of the Site.
18. The only large operational (or consented) wind turbine within 10km of the Site boundary is the Lemreway Wind Turbine, which is located approximately 3.54km from the Site and consists of a single turbine at 42m tip height.

## 2.2 Planning History of the Site

19. Consent has previously been granted by Scottish Ministers (under Section 36 of the Electricity Act 1989) for the development of Muaitheabhal Wind Farm on the Site in 2010 (ECU Reference: EC00005222). Consent was granted in 2011 for Muaitheabhal East Extension Wind Farm (ECU Reference: EC00005223) and in 2015, Muaitheabhal South Extension was also consented (ECU Reference: EC00002096) on land to the south and west of Loch Sealg, also within the Eishken Estate. In total the three Section 36 consents comprise 45 turbines (see **Project Comparison Report** for more detail). All 45 turbines, bar two turbines from the Muaitheabhal South Extension, are located within the Site boundary as shown in **Figure 2** and listed below:
- Muaitheabhal Wind Farm Main Consent (33 turbines up to 145m to tip consented in January 2010);
  - Muaitheabhal East Extension (6 turbines up to 150m to tip consented in December 2011); and
  - Muaitheabhal South Extension (6 turbines up to 150m to tip and 1 turbine up to 130m to tip consented in September 2015).
20. The consents have been implemented through development of a bell mouth junction for the main/original consent and east extension, and via other limited ongoing infrastructure works for the south extension.

## 2.3 Overview of the Proposed Development

21. The proposed development would comprise the following principal components:
- 25 wind turbines, with a maximum blade tip height of up to 200m (three turbines have a blade tip height of 180m);



- 25 turbine foundations;
  - hard standings adjacent to each wind turbine, including crane pads;
  - underground electrical cabling;
  - a substation control building and compound;
  - new internal tracks and upgrading of existing tracks, including watercourse crossings where necessary;
  - two permanent meteorological (met) masts;
  - search areas for up to five borrow pits; and
  - two temporary construction compounds.
22. The layout of the proposed development is shown on **Figure 3**. It is requested that the precise locations of the proposed wind turbines and ancillary infrastructure may be microsited within a 75m radius from the positions shown on **Figure 3**. This micrositing is requested in order to allow a degree of flexibility to take into account localised ground conditions and other environmental constraints which may be identified during post consent survey works. A micrositing planning condition requiring all micrositing of infrastructure (including wind turbines) to be within a 75m radius from the positions shown on **Figure 3** is proposed.

## 2.4 Wind Turbines

23. A range of wind turbine models may be suitable for the Site, and the final choice of turbine model would be selected through a competitive procurement process. As there is an uncertainty relating to which wind turbine model would be used at the time of construction, this application requests a reasonable degree of flexibility for the permissible dimensions of the turbine. However, based upon a maximum blade tip height of between 180m and 200m, it is anticipated that the installed nominal capacity of each wind turbine will be approximately 6.6MW.
24. There is a statutory requirement to install visible aviation lights on the wind farm because the turbines are of 150m or greater in vertical height. In order to minimise landscape and visual effects arising, it was considered appropriate to devise a reduced lighting scheme, which does not require all of the proposed turbines to be lit. This can be acceptable where the night time use of the airspace is only very rarely low flying Visual Flight Rules (VFR) traffic with no Night Vision Goggles (NVGs).
25. The proposed reduced lighting scheme is for seven (of the cardinal) turbines to have nacelle mounted, medium intensity, visible spectrum, steady red obstacle lights. The seven turbines proposed to have this lighting applied are turbines T1, T3, T7, T12, T18, T22 and T25. The lights would operate from dusk until dawn.

## 2.5 Ancillary Infrastructure

26. Turbine foundation construction design will be finalised at the detailed design engineering stage following selection of the final wind turbine to be used for construction.
27. A crane hardstanding of approximately 50m x 20m x 1m will be required adjacent to each wind turbine, to provide a stable base for construction and crane erection activities. These crane hardstanding areas will be permanently retained for maintenance operations. The crane hardstanding would also include a



number of smaller, temporary, crane boom support pads alongside the access track, going back potentially a further 117m from the edge of the main crane hardstanding area.

28. For the access route to connect to the Site infrastructure, a total of approximately 28.6km of access track will be required. This will comprise approximately 16.5km of new track (of which approximately 2.2km would be floated track), and approximately 12.1km of existing track which will require to be upgraded. This internal access track will require the formation of 21 new watercourse crossings and upgrading of 33 existing watercourse crossings.
29. The electricity produced by the wind turbines will be fed by underground cables, to a substation control building (located within the substation compound) at NGR NB 32509 14230. The proposed substation compound would be approximately 75m x 100m and the proposed substation control building would measure approximately 16m(w) x 30m(l) x 8m(h).

## 2.6 Construction Phase

30. It is anticipated that construction activities for the proposed development would take approximately 36 months.
31. The proposed Site access and delivery route for construction traffic is anticipated to be from the A859 as shown in **Figure 4**. This route may also be used for the delivery of turbine components; however, consideration is being given to the use of a berthing facility on the north shore of Loch Sealg, in order to bring large components, e.g. turbine blades, to Site. This would avoid the need to transport abnormal loads via the road network (A859) from the Port of Arnish. A separate planning application for the berthing facility is being considered and if deemed appropriate, a planning application may be submitted in late 2023 or early 2024.

## 2.7 Operational Phase

32. Although it is increasingly considered that there is no operational need to limit the lifetime of a renewable energy development, consent in this instance is being sought for a period of 30 years.

## 2.8 Decommissioning and Site Restoration

33. At the end of its operational life, it is anticipated that the proposed development would be decommissioned in accordance with a Decommissioning and Restoration Plan (DRP) which would be submitted to the CnES for approval no later than 12 months prior to the start of decommissioning. Alternatively, a new application could be made to extend its operational life. Following this, providing there has been no approval to extend the life, it is expected that the Uisenis Wind Farm would then be decommissioned.

## 3.0 Benefits of the Proposed Development

### 3.1 Renewable Electricity Generation

34. The proposed wind turbines would have an anticipated nominal capacity of approximately 165MW. The annual generation from the wind turbines is therefore estimated at approximately 578,160 Megawatt hours (MWh) based on a site derived capacity factor of 40%.
35. Based upon this predicted annual electricity generation figure and the most recent energy statistics provided by the Department of Business, Energy and Industrial Strategy (BEIS)<sup>2</sup> which identify that average UK domestic household consumption is 3,509 kilowatt hours per annum, it is estimated that the proposed development will supply renewable electricity equivalent to the current annual domestic needs of approximately 164,764 UK households.
36. The Scottish Ministers are legally bound through the Climate Change (Scotland) Act 2009<sup>3</sup> to reduce carbon emissions to net zero by 2045, with interim targets to reduce emissions by 75% by 2030 and 90% by 2040. A series of annual targets towards this net zero and interim target have also been set.
37. The proposed development would reduce greenhouse gas emissions through replacing fossil fuel generation. On the basis of anticipated renewable energy generation output presented above, it is submitted that the proposed development would make a substantial contribution towards climate change targets, in particular towards the interim target for a 70% reduction in greenhouse gas emissions by 2030.

### 3.2 Carbon Payback

38. The length of time a wind turbine needs to be in operation before it has, by displacing fossil fuel energy generation, avoided as much carbon dioxide as was released in its lifecycle is known as the carbon payback period.
39. A carbon balance assessment has been undertaken for the proposed development using the latest version of the Scottish Government's carbon calculator for wind farms (version 1.6.1). The methodology used for the carbon calculator includes a range of factors that account for carbon losses including:
  - turbine lifecycle (e.g. manufacture, construction and decommissioning);
  - backup power generation when the wind turbines cannot generate energy;
  - reducing carbon fixing potential from peat loss;
  - soil organic matter from peat losses; and
  - dissolved organic carbon and particulate organic carbon leaching from changes in drainage in peat.
40. The methodology also includes the following range of factors that account for carbon savings including:
  - improvement of degraded bogs;
  - restoration of peat from excavations; and
  - removal of drainage from foundations and hardstanding.

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<sup>2</sup> Calculated using the most recent statistics from the Department of Business, Energy and Industrial Strategy (BEIS) showing that annual UK average domestic household consumption in 2022 was 3,509kWh

<sup>3</sup> Scottish Government (2009). Climate Change (Scotland) Act 2009

41. The results of the annual carbon savings calculations are presented as equivalent to the tonnes of carbon dioxide per year (tCO<sub>2</sub> yr<sup>-1</sup>) saving relative to coal fired electricity generation, fossil fuel generation, and grid mix generation (which includes some fossil fuels and low carbon electricity generation sources such as nuclear, hydro-electric and wind energy).
42. The carbon savings calculations for the proposed development are presented in **Table 3-1** for three scenarios. The first scenario is the expected scenario, which uses impact factors that are considered to be the most likely for the proposed development. Two further (minimum and maximum) scenarios are also presented that use a wide range of factors that test the sensitivity of expected predictions to input variations.

**Table 3-1: Anticipated Carbon Emissions / Payback Period**

Results	Exp.	Min.	Max.
Net emissions of carbon dioxide (t CO <sub>2</sub> eq.)	367,651	215,668	635,462
<b>Carbon Payback Time</b>			
Coal-fired electricity generation (years)	0.6	0.4	1.1
Grid-mix of electricity generation (years)	3.3	1.9	5.8
Fossil fuel - mix of electricity generation (years)	1.5	0.8	2.6
Ratio of CO <sub>2</sub> eq. emissions to power generation (g / kWh) (TARGET ratio by 2030 (electricity generation) < 50g /kWh)	21.2	11.74	38.87

43. As identified in the table, the estimated carbon payback period for the proposed development under the expected scenario would be approximately 1.5 years, which would lead to substantial net carbon savings over the operational lifespan of the development. This positive aspect of the development is augmented by the layout of the proposed development largely avoiding deposits of deep peat and by the proposed peatland restoration that will be undertaken.

### 3.3 Socio-Economic Benefits

44. The capital investment for the overall project is estimated at £165 million, which would include £6.6 million for development and project management, £120.2 million for turbines and plant, £17.7 million for electricals and grid connection and £20.6 million for civil engineering, contingency and others.
45. In terms of employment during the construction and operational stages, this investment creates a number of economic opportunities for local and national businesses. The Socio-economics, Tourism, Recreation and Land Use Chapter of the EIA Report identifies that the construction of the proposed development will directly support an estimated 39.6 person-years of net additional temporary employment locally and a further 322.3 person-years within Scotland during the 36 month construction period. The local economy would be expected to be boosted by approximately £2.54 million of net Gross Value Added (GVA) and the Scottish economy by a further approximately £22.03 million GVA during the construction of the proposed development. The operational phase of the proposed development will directly support approximately seven full time equivalent jobs locally and indirectly support approximately 23 full time equivalent jobs locally.

46. It is anticipated that a wide selection of supply chain businesses could expect to benefit from the investment in the local and Scottish economies. This may include services such as ground and road maintenance, catering, building trades and plant hire. Uisenis Power Limited is committed to employing good practice measures with regard to maximising local procurement and would adopt established good practice measures such as 'Meet the Developer/Contractor Days' prior to construction, aimed specifically at small to medium enterprises, to discuss the types of contracts being let during construction and operation. It is also considered likely that the proposed development would operate in combination with other renewable energy projects in the area to encourage the development of relevant skills and longer term business opportunities as the Western Isles continue to capitalise on their natural energy resources as part of its commitment to economic recovery and response to climate change. Uisenis Power Limited aim to procure 75% of the value of construction contracts, for the proposed development, from the Outer Hebrides area. There is a Section 75<sup>4</sup> agreement in place as part of the Muaitheabhal Wind Farm (and extensions) consent, and the applicant is willing to enter into a similar obligation for the proposed development should it be granted consented. Further detail on community benefit proposals is provided in Section 3.5.

### 3.4 Peatland Restoration and Habitat Management

47. A Habitat Management Plan (HMP) will be produced for the proposed development. The overall purpose of the HMP will be to implement positive land management for the benefit of landscape and nature conservation which will mitigate any adverse impacts that the proposed development may have. In addition to purely mitigating any adverse impacts, the applicant is committed to enhancing the nature conservation and landscape value of the site.
48. At the centre of the HMP for the proposed development will be proposals for blanket bog and wet heath restoration. An outline HMP is included in **Technical Appendix 8.5** of the EIA Report, which outlines the proposals for approximately 50ha of blanket bog restoration (compared to 40ha lost as a result of the proposed development), and 537ha of wet heath restoration (compared to the 34ha lost as a result of the proposed development).
49. Once the proposed blanket bog and wet heath restoration has succeeded, it is considered that it would result in a net positive impact and likely net gain in biodiversity.

### 3.5 Community Benefit and Shared Ownership

50. The applicant is committed to offering a package of benefits to communities local to the proposed development. In addition, the applicant is also proposing to offer local communities the option to invest in the proposed development.

#### 3.5.1 Shared Ownership

51. The proposed development is being progressed with a shared ownership opportunity for communities in the local area, which are being offered the opportunity to acquire up to a 20% share of the proposed development. This would be explored in depth with CnES and the existing local development trusts should the proposed development receive consent. A variety of community share ownership structures, in line with the Scottish Government's Good Practice Principles, will be explored and discussed over the next few months. If community shared ownership is not progressed (not the desired route for local communities in

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<sup>4</sup> A voluntary agreement between the landowner and the Council, made under Section 75 of the Town and Country Planning (Scotland) Act 1997.

proximity to the proposed development), a contribution agreement of up to 1.5% of annual revenue would be agreed with the relevant local development trusts.

### 3.5.2 Community Benefit Fund

52. In addition to the shared ownership opportunity, should the proposed development gain consent, a Community Benefit Fund would be made available. This will be offered on the basis of a payment per MW of installed capacity at the Scottish Government recommended rate at the time of commissioning the proposed development. At present the recommended rate is £5,000 per MW. Based on a capacity of 165MW, the proposed 25 wind turbines would contribute approximately £825,000 to the community benefit funds per annum; and £24,750,000 over the 30 year life of the proposed development.
53. It is expected that any proposed income streams from these community benefit payments and profit from any community investment in the project could be used to support community projects within the local area. Local communities would be empowered to choose how the money is spent.
54. Benefits would accrue from the scale and nature of the proposed income streams associated with the proposed development and could have a lasting positive effect on access to resources, improvement to local amenities and the quality of life of local residents as well as economic benefits. The long-term nature of the income would allow the community to plan ahead, to draw in other sources of match funding to maximise the benefits and investment projects could be designed to match local priorities.

### 3.5.3 Other Community Benefit Proposals

55. In addition to the shared ownership opportunity and the Community Benefit Fund, the applicant has committed to a number of other community benefit proposals.
56. Uisenis Power Limited aim to procure 75% of the value of construction contracts, for the proposed development, from the Outer Hebrides area. There is a Section 75 agreement in place as part of the Muaitheabhal Wind Farm (and extensions) consent, and the applicant is willing to enter into a similar obligation for the proposed development should the it be granted consented.
57. Uisenis Power Limited has also made a commitment to establishing a paid apprenticeship scheme during the construction of the proposed development.
58. A £750,000 footpath improvement fund would be set up in order to facilitate improvements to footpaths within the vicinity of the proposed development and across the Island of Lewis.
59. A commitment is also made to contribute £150,000 per annum to a local Eagle Conservation Programme over the lifetime of the proposed development.

### 3.5.4 Comparison of Community Benefit Proposals

60. **Table 3-2** provides a comparison of the community benefit proposals offered by the proposed development and the consented Muaitheabhal Wind Farm(s).

**Table 3-2: Comparison of Community Benefit Proposals**

Proposed Development	Muaitheabhal Wind Farm(s)
Aim to procure 75% of the value of construction contracts, for the proposed development, from the Outer Hebrides area on terms and conditions as to price, quality, timing and performance guarantees equivalent to alternative satisfactory suppliers.	Aim to procure 75% of the value of construction contracts, for the proposed development, from the Outer Hebrides area on terms and conditions as to price, quality, timing and performance guarantees equivalent to alternative satisfactory suppliers.
Shared ownership opportunity for communities in the local area, which are being offered the opportunity to acquire up to a 20% share of the proposed development. If community shared ownership is not progressed (not the desired route for local communities in proximity to the proposed development), a contribution agreement of up to 1.5% of annual revenue would be agreed with the relevant local development trusts.	Contribution agreement of 1% revenue to Muaitheabhal Community Wind Farm Trust. Contribution agreement of 0.5% to Western Isles Development Trust.
Community Benefit Fund - Scottish Government recommended rate at present is £5,000 per MW. Based on a capacity of 165MW, the proposed 25 wind turbines would contribute approximately £825,000 to the community benefit funds per annum; and £24,750,000 over the 30 year life of the proposed development.	Community Benefit Fund - Scottish Government recommended rate at time of consent was £1,250 per MW. Based on a capacity of 162MW, the proposed 45 wind turbines would contribute approximately £202,500 to the community benefit funds per annum; and £5,062,500 over the 25 year life of the proposed development.
A £750,000 footpath improvement fund.	A £750,000 footpath improvement fund.
£150,000 per annum to a local Eagle Conservation Programme for lifetime of proposed development.	£150,000 per annum to a local Eagle Conservation Programme for lifetime of consented scheme.
Establish a paid apprenticeship scheme during the construction of the proposed development.	-

## 4.0 Legislative Context

### 4.1 Section 36 of the Electricity Act 1989

61. As the proposed development is for a generating station in excess of 50MW, the application for consent and deemed planning permission is made to the Scottish Ministers under section 36 of the Electricity Act 1989.
62. The applicant has obligations under sub-paragraphs 3(1)(a) and 3(1)(b) of Schedule 9 of the Electricity Act 1989 which requires it to have regard to certain environmental matters when formulating development proposals. It is obliged to have regard to the desirability of preserving natural beauty, conserving listed natural heritage interests and to protecting sites, buildings and objects of architectural and historical interest. It must also do what it reasonably can to mitigate any effects of the proposed development and it must not impact fisheries or fish stocks in any waters.
63. The EIA process undertaken for the proposed Uisenis wind farm has considered all of the environmental matters set out in Schedule 9, paragraph 3(1)(a). Indeed, the EIA process has a broader topic range than that contained in the aforementioned sub-paragraph. Furthermore, where significant effects are found as part of the EIA process, appropriate mitigation is proposed. This includes embedded mitigation which is integral to the design and specific mitigation measures which have been identified. The EIA Report sets out in detail how the applicant has approached the design of the scheme and how careful consideration has been given throughout that process to the matters that are listed in sub-paragraph 3(1)(a). It is therefore considered that the applicant has fulfilled the statutory requirements of Schedule 9.
64. In addition, Schedule 9 of the Electricity Act 1989 also imposes duties upon the Scottish Ministers to consider whether the applicant has provided sufficient information to enable them to address their duties under sub-paragraph 3(1)(a) of Schedule 9 to the 1989 Act. They are obliged to have regard to desirability of the matters mentioned in paragraph (a) of sub-paragraph (1) and must also have regard to the extent to which the applicant has complied with their duties to mitigate any effects on those resources. Again, the Scottish Ministers can be satisfied that the EIA process has been undertaken appropriately and addresses these matters comprehensively.
65. In terms of determinations under section 36, there are no specific statutory presumptions that apply. As identified above, there are considerations which have to be taken into account and dealt with under Schedule 9. In that context, important factors that must be taken into account include international decarbonisation obligations and commitments, United Kingdom and Scottish climate change and energy policy, the relevant provisions of the Development Plan (including National Planning Framework 4) and the views of statutory consultees and interested parties. All of these matters are material and should be taken into account in the decision-making process. The ultimate weight of any particular factor in the decision-making process is a matter for the decision maker, though guidance on the weight that the applicant considers should be afforded to these considerations is provided in this Planning Statement.
66. In the case of section 36 applications, it is important to note that the role of the Development Plan is not the same as in the case of a planning application made under the Town and Country Planning (Scotland) Act 1997. The test set out in Section 25 of the Town and Country Planning (Scotland) Act 1997, which provides that development must accord with the terms of the Development Plan, is not engaged in the case of a section 36 application. Whilst for such an application the Development Plan does not have primacy in the decision-making process, it may nonetheless be a material consideration in respect of determination of the application.



## 5.0 Climate Change and Renewable Energy

### 5.1 Introduction

67. The Electricity Act 1989 provisions detailed above are the primary considerations in determining applications submitted under this Act. Nonetheless, Scottish Ministers must have regard to any material UK and Scottish Government energy, climate policy and legislative provisions, in addition to national planning policy and advice, in determining a section 36 application.
68. The framework of international agreements, obligations, legally binding targets and climate change advisory reports is the foundation upon which national energy policy is based. This sets out the need case for renewable energy which provides strong support for onshore wind in principle. In addition, NPF4 (discussed in Section 6.2 below) sets out, in policy, that decision makers must give significant weight to the global climate emergency and nature crises.
69. **Appendix 01** sets out a summary of the relevant historical international and national climate change and renewable energy context, as well as the current emissions reduction legislative framework. **Table 5-1** provides an overview of the some of the key international and UK commitments.

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

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

70. As shown in **Table 5-1** and **Appendix 01** the international and UK climate change and renewable energy context is focused on reducing emissions and achieving ‘net zero’ in order to limit global warming. Increasing the speed of the shift towards renewable energy (including onshore wind) remains a critical element of achieving these aims. The following sections (5.2 to 5.7) will focus on the key Scottish climate change and renewable energy policies, strategies and legislation, as well as looking at the progress towards the carbon reduction / renewable energy production targets relevant to the proposed development.



## 5.2 Scottish Energy Strategy 2017 (SES)

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

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

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

## 5.4 Onshore Wind Policy Statement (OWPS) 2022

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

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

## 5.5 Draft Energy Strategy and Just Transition Plan 2023

81. On 10 January 2023, the Scottish Government published the Draft version of its ‘Energy Strategy and Just Transition Plan - delivering a fair and secure zero carbon energy system for Scotland’. This plan outlines the key ambitions for Scotland’s energy future, with an even greater focus on renewable energy. It is predicted that these policies would result in a net jobs gain across the energy production sector and will increase renewable energy exports whilst also reducing exposure to future global energy market fluctuations.
82. The Plan outlines several of the government’s targets to reach a net zero Scotland, with the main milestones and dates outlined as:
- to substantially increase Scotland’s renewable electricity generation capacity from the current level of 13.4 Gigawatts (GW) with an additional 20GW resulting in an overall capacity of at least 33.4GW by 2030;
  - aims to have 8-11GW of installed offshore, and an additional 12GW<sup>5</sup> of installed onshore wind capacity by 2030;
  - for renewable and low-carbon hydrogen power to provide 5GW (the equivalent of 15% of Scotland’s current energy needs) by 2030, increasing to 25GW by 2045; and
  - to phase out the necessity for new petrol and diesel cars by 2032, and to reduce total car kilometres by 2030.
83. The plan also outlines general commitments made by the Government to assist with the transition to net zero, which include the following:
- to establish a national public energy agency – ‘Heat and Energy Efficiency Scotland’;

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<sup>5</sup> It is acknowledged that in the Draft Energy Strategy and Just Transition Plan, the indicative breakdown of the 12GW figure and how it could be reached, will include the MW’s from the consented Muaitheabhal Wind Farm (and extensions) as ‘awaiting construction’.

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

## 5.6 Progress Towards Targets

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

**Table 5-2: Progress Against Renewable Energy Targets**

Year	Target	Achieved/Progress
2020	Equivalent of 100% of all electricity used in Scotland to come from renewable sources. <sup>6</sup>	No - equivalent of 98.6% of all electricity used in Scotland came from renewable sources. <sup>6</sup>
2021	Equivalent of 100% of all electricity used in Scotland to come from renewable sources. (continuation of 2020 target as target was not met)	No - equivalent of 85.2% of all electricity used in Scotland came from renewable sources. ( <b>Graph 5-1</b> ).
2030	To increase the installed onshore wind capacity in Scotland to 20GW. <sup>7</sup>	Latest figures in September 2022 (most recently available) show that the installed onshore wind capacity in Scotland was 13.6GW. <sup>8</sup>
2030	To generate 50% of Scotland’s overall energy consumption from renewable sources. <sup>9</sup>	Final figures for 2020 indicate that the equivalent of 26.7% of total Scottish energy consumption came from renewable sources; the highest level to date. It increased from 24.0% in 2019 ( <b>Graph 5-2</b> ).
2050	To have decarbonised the energy system almost completely. <sup>9</sup>	Future target and difficult to gauge progress against.

<sup>6</sup> Scottish Government (2011) *2020 Renewable Routemap for Renewable Energy in Scotland Update 2011*

<sup>7</sup> Scottish Government *Onshore Wind Policy Statement 2022*

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

<sup>8</sup> Scottish Government *Energy Statistics for Scotland – Q3 2022*

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

<sup>9</sup> Scottish Government (2017). *The future of energy in Scotland: Scottish energy strategy* 20 December 2017

**Table 5-3: Progress Against Greenhouse Gas Emissions Targets**

Year	Current Target <sup>10</sup> (% Reduction of Emissions relative to 1990)	Recommended Target <sup>11</sup> (% Reduction of Emissions relative to 1990)	Achieved/Progress <sup>12</sup>
<b>2020</b>	56% reduction.	N/A	Achieved – GHG account reduced by 59% between the baseline period and 2020. As detailed in the Scottish Emissions Targets – First Five-Yearly Review (December 2022): <i>“The fall in emissions in 2020 was largely due to the travel restrictions during the COVID-19 pandemic and it is unlikely the target would have been achieved without the impacts of the pandemic.”</i>
<b>2021</b>	57.9%	51.1%	Not achieved – GHG account reduced by 49.9% between baseline period and 2021.
<b>2022</b>	59.8%	53.8%	Most recent data available is 2021 figure.
<b>2023</b>	61.7%	56.4%	Most recent data available is 2021 figure.
<b>2024</b>	63.6%	59.1%	Most recent data available is 2021 figure.
<b>2025</b>	65.5%	61.7%	Most recent data available is 2021 figure.
<b>2026</b>	67.4%	64.4%	Most recent data available is 2021 figure.
<b>2027</b>	69.3%	67.0%	Most recent data available is 2021 figure.
<b>2028</b>	71.2%	69.7%	Most recent data available is 2021 figure.
<b>2029</b>	73.1%	72.3%	Most recent data available is 2021 figure.
<b>2030</b>	75% reduction.	75% reduction.	Most recent data available is 2021 figure.
<b>2040</b>	90% reduction.	90% reduction.	Most recent data available is 2021 figure.
<b>2045</b>	100% reduction.	100% reduction.	Most recent data available is 2021 figure.

<sup>10</sup> Scottish Government (2019). Climate Change (Emissions Reduction Targets) (Scotland) Act 2019

<sup>11</sup> Independent Climate Change Committee (2022). Scottish Emissions Targets – First Five-Yearly Review

<sup>12</sup> Scottish Government *Scottish Greenhouse Gas Statistics 2021*:

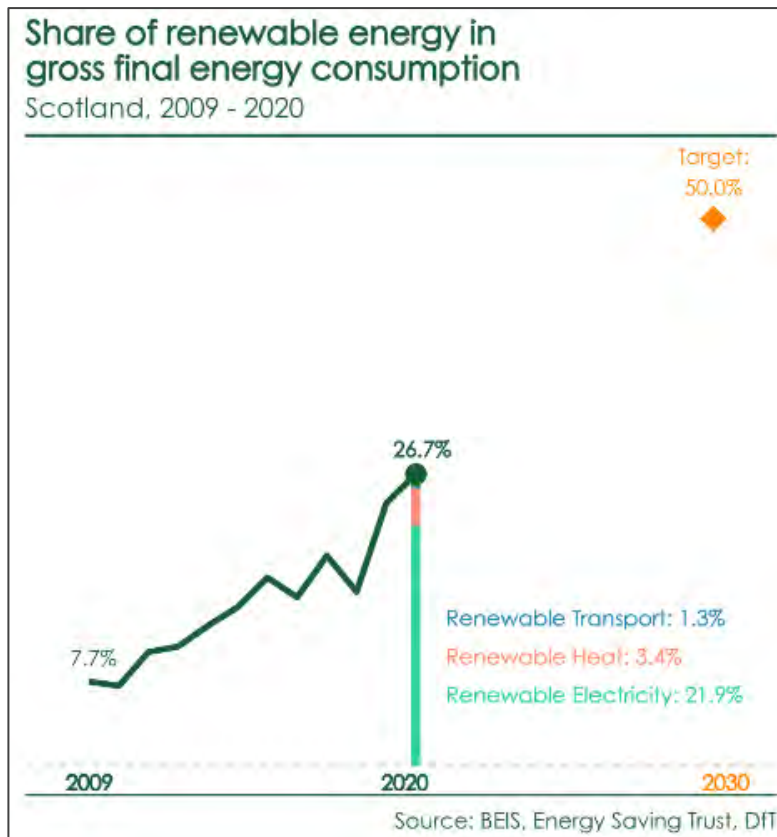
<https://www.gov.scot/binaries/content/documents/govscot/publications/statistics/2023/06/scottish-greenhouse-gas-statistics-2021/documents/scottish-greenhouse-gas-statistics-2021/scottish-greenhouse-gas-statistics-2021/govscot%3Adocument/scottish-greenhouse-gas-statistics-2021.pdf>

**Graph 5-1: Renewable Electricity Generation in Scotland**



Source: Energy Statistics for Scotland Q3 2022

**Graph 5-2: Progress Against Renewable Energy Targets**



(Scottish Energy Statistics Hub, 2022)

85. **Table 5-2** details that the target for the equivalent of 100% of all electricity used in Scotland to come from renewable sources by 2020, was not achieved. **Table 5-2** and **Graph 5-1** show that the target was just narrowly missed, with the equivalent of 98.6% of all electricity used in Scotland in 2020 coming from renewable sources. The target was continued into 2021, however that year saw the equivalent of only 85.2% of all electricity used in Scotland coming from renewable sources (see **Graph 5-1**). There is therefore clearly still the need for an increase in the amount of electricity generated from renewable sources.
86. The 2030 targets detailed in **Table 5-2** require approximately a further 6.4GW of onshore wind capacity to be installed in under seven years from now. In addition to this 50% of Scotland's overall energy consumption (not just electricity) is to come from renewable sources by 2030 (see **Graph 5-2** for most up to date progress towards this target).
87. **Table 5-3** shows the progress Scotland is making against its greenhouse gas emissions targets. The Table shows that the 2020 target of a 56% reduction of green house gas emissions relative to 1990 was achieved, however as detailed in the Scottish Emissions Targets – First Five-Yearly Review (December 2022), this was mainly due to travel restrictions during the COVID-19 pandemic and the target would likely not have been achieved without the impacts of the pandemic. It should be noted that the Scottish Emissions Targets – First Five-Yearly Review (December 2022), recommends that the annual targets for green house gas emissions be amended to those shown in the 'Recommended Target' column of **Table 5-3**. However, as can be seen in **Table 5-3**, Scotland met neither the current or recommended emissions reduction targets for 2021, and indeed emissions increased from 2020 levels.
88. Having missed its 2021 green house gas emissions targets, it can be considered that Scotland is not currently on course to achieve the 2030 target of a 75% reduction in emissions relative to 1990. This is highlighted by the CCC in their 2022 Report to Parliament<sup>13</sup>, advising that the Scottish Government urgently needs to provide a quantified plan for how polices will combine to achieve emissions reductions, and subsequently the 2030 target.

## 5.7 Conclusions

89. The broad strategic (targets) and policy context in Scotland (as well as the UK as whole and internationally) is strongly supportive of the urgent need for additional renewable energy generation capacity. The drivers behind this support can be summarised as follows:
- the need to address climate change and avoid / mitigate against the worst projected effects;
  - the growing demand for electricity and the increased need for renewable energy generation that will be required to meet this need;
  - the need for Scotland (and the UK) to reduce its dependency on imported oil and gas and to source more of its energy domestically.
90. As mentioned above and as discussed further in **Appendix 01**, the climate change policy context (including renewable energy policy) is highly supportive of renewable energy development. This support, in principle, is advocated from international level policy through to the UK level, Scottish Government level and local government level. The highly supportive strategy and policy framework has resulted in ambitious renewable energy and climate change targets, however it is clear from Section 5.6, that Scotland is not on course to meet these targets.

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<sup>13</sup> Climate Change Committee (2022). Scottish Emission Targets – First Five-Yearly Review and Progress in reducing emissions in Scotland – 2022 Report to Parliament.

91. As detailed in Section 5.6, Scotland did not meet its 2020 target for 100% of all electricity used in Scotland to come from renewable sources (it also did not meet this target in 2021). Scotland did meet its 2020 target of a 56% reduction of green house gas emissions relative to 1990, however this was largely due to the impact of the COVID-19 pandemic, and evidence shows emissions rebounded in 2021. Scotland therefore did not meet either the current or recommended 2021 target for emissions reductions.
92. Overall, it is therefore concluded that the urgency of the renewable energy and climate change targets set by the Scottish Government (and UK Government) and the associated vital role that renewable energy developments such as the proposed development can play in meeting these targets, should be afforded substantial weight in the planning balance during determination of this application.



## 6.0 Planning Policy

### 6.1 Planning Policy Considerations

93. The Scottish Government adopted the National Planning Framework 4 (NPF4) on 13 February 2023. NPF4 has now replaced National Planning Framework 3 (NPF3) and the Scottish Planning Policy 2014 (SPP). NPF3 and SPP no longer represent Scottish Ministers' planning policy and should not form the basis for (or be taken into consideration when) determining planning applications or Section 36 applications. Both have been repealed entirely.
94. Section 13(2)(1) of the Planning (Scotland) Act 2019 amended Section 24 of the Town and Country Planning (Scotland) Act 1997 states that the Development Plan for an area is to be taken as consisting of the provisions of the National Planning Framework (now NPF4) alongside any local development plan for the time being applicable to the area.
95. Under Section 13(2)(3) of the Planning (Scotland) Act 2019, where there is any inconsistency between the local development plan and NPF4, then whichever of them is later in date will prevail. In this case, NPF4 is the more recent document, with the Outer Hebrides LDP and supplementary guidance being adopted in 2018.
96. The NPF4 and the relevant LDP are to be read together as the Development Plan. But where there is an incompatibility between one document and the other, the legislation prescribes that the later document prevails. For present purposes that is NPF4.

### 6.2 National Planning Framework 4 (NPF4)

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

*"Planning carries great responsibility – decisions about development will impact on generations to come. Putting the twin global climate and nature crises at the heart of our vision for a future Scotland will ensure the decisions we make today will be in the long-term interest of our country."*

98. Overall, NPF4 can be considered to be more 'pro renewable energy development' than its predecessors NPF3 and SPP. NPF4 contains stronger and clearer policy support about the weight that should be given to the addressing the climate emergency and nature crises when assessing applications.
99. NPF4 removes the spatial framework for Onshore Wind Farms and replaces it with a strategic spatial strategy which supports onshore wind energy generation and associated grid infrastructure in Scotland.

#### 6.2.1 The Application of NPF4

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

*"The policy sections are for use in the determination of planning applications. The policies should be read as a whole. Planning decisions must be made in accordance with the development plan, unless material considerations indicate otherwise. It is for the decision maker to determine what weight to attach to policies on a case by case basis. Where a policy states that development will be supported, it is in principle, and it is for the decision maker to take into account all other relevant policies".*



101. Annex A outlines that NPF4 is required by law to contribute to six outcomes. These relate to meeting housing needs, health and wellbeing, population of rural areas, addressing equality and, most relevant to the proposed development, "*meeting any targets relating to the reduction of emissions of greenhouses gases, and, securing positive effects for biodiversity*".
102. NPF4 contains a spatial strategy and Scottish Government development management policies to be applied in all planning decisions and it identifies national developments which are aligned to the strategic themes of the Government's Infrastructure Investment Plan<sup>14</sup>
103. Consideration of the proposed development against NPF4 policies can be found in Section 6.2.4 below, however it is considered important to firstly demonstrate the proposed development's status as a 'National Development' within NPF4.

### 6.2.2 National Developments

104. Annex B of NPF4 continues the approach set out in NPF3 of identifying national developments which are described as "*significant developments of national importance that will help to deliver the spatial strategy.*"
105. Prescribed National Developments which are relevant to the proposed development are National Development 1, entitled 'Energy Innovation Development on the Islands' and National Development 3 entitled 'Strategic Renewable Electricity Generation and Transmission Infrastructure'.
106. Page 100 of NPF4 states the following with regards National Development 1:

*"This national development supports proposed developments in the Outer Hebrides, Shetland and Orkney island groups, for renewable energy generation...and associated opportunities in the supply chain for fabrication, research and development....These classes of development support the potential of the three island authorities to exemplify a transition to a net zero society. This will support delivery of our spatial strategy by helping to sustain communities in rural and island areas by stimulating employment and innovation."*

107. With regards to designation and classes of development, the following is stated in relation to the Outer Hebrides:

*"Supporting the Arnish Renewables Base and Outer Hebrides Energy Hub*

*The classes below apply to development that is for delivery of the Arnish Renewables Base and Outer Hebrides Energy Hub:*

- a) New or updated on and/or off shore infrastructure for energy generation from renewables exceeding 50 megawatts capacity;*
- b) Electricity transmission cables and converter stations on and/or off shore of 132 kilovolts (kv) and above;*
- c) Infrastructure for the production, storage and transportation of low and zero-carbon fuels (that are not electricity or heat) including renewable hydrogen; and hydrogen production related chemicals including*

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<sup>14</sup><https://www.gov.scot/publications/national-mission-local-impact-infrastructure-investment-plan-scotland-2021-22-2025-26/documents/>. Feb, 2021

*ammonia with appropriate carbon capture linked to transport and storage infrastructure;*

*d) Improved oil storage infrastructure for Stornoway, with appropriate emissions abatement; and*

*e) Quay to service renewable energy, energy transportation, energy decommissioning, fabrication or freight handling, including new or enhanced associated laydown or operational area at Arnish.”*

108. The proposed development, being an onshore wind farm on the Isle of Lewis, with an installed capacity in excess of 50MW, therefore clearly fits with class a) detailed above, and also facilities/supports classes b) and e). The proposed development therefore clearly fits under National Development 1 within NPF4.

109. Page 103 of NPF4 states the following with regards National Development 3, which locationally relates to all of Scotland:

*“This national development supports renewable electricity generation, repowering, and expansion of the electricity grid...A large and rapid increase in electricity generation from renewable sources will be essential for Scotland to meet its net zero emissions targets....Additional electricity generation from renewables and electricity transmission capacity of scale is fundamental to achieving a net zero economy and supports improved network resilience in rural and island areas. Island transmission connections in particular can facilitate capturing the significant renewable energy potential in those areas as well as delivering significant social and economic benefits.”*

110. The statement of need for National Development 3 goes on to set out classes of development that will support the strategic renewable electricity generation and transmission infrastructure. The relevant class for the proposed development is:

*“a) On and off shore electricity generation, including electricity storage, from renewables exceeding 50 megawatts capacity;”*

111. The proposed development is an onshore wind farm in Scotland with an installed capacity in excess of 50MW and therefore clearly fits under National Development 3 within NPF4.

112. The proposed development therefore has National Development status.

### **6.2.3 NPF4 Spatial Strategy - Part 1**

113. Part 1 of NPF4 is ‘A National Spatial Strategy for Scotland 2045’. The spatial strategy is to support the delivery of:

- ‘Sustainable Places’: *“where we reduce emissions, restore and better connect biodiversity”*;
- ‘Liveable Places’: *“where we can all live better, healthier lives”*; and
- ‘Productive places’: *“where we have a greener, fairer and more inclusive wellbeing economy”*.

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

### **6.2.4 NPF4 National Planning Policy – Part 2**

115. Part 2 of NPF4 sets out national planning policies by topic related to the three themes for the delivery of sustainable, liveable and productive places. In terms of development management and the application of national level policies, NPF4 states:

*"The policy sections are for use in the determination of planning applications. The policies should be read as a whole. Planning decisions must be made in accordance with the development plan, unless material considerations indicate otherwise. It is for the decision maker to determine what weight to attach to policies on a case by case basis. Where a policy states that development will be supported, it is in principle, and it is for the decision maker to take into account all other relevant policies".*

116. Page 36 of NPF4 introduces the 'sustainable places' policies which are the policies most applicable to the proposed development. The principal policy to consider for the proposed wind energy development is Policy 11: Energy. Other relevant policies to the proposed development are:

- Policy 1: Tackling the Climate and Nature Crisis;
- Policy 2: Climate Mitigation and Adaptation;
- Policy 3: Biodiversity;
- Policy 4: Natural Places;
- Policy 5: Soils;
- Policy 7: Historic Assets and Places; and
- Policy 10: Coastal Development.

117. Other national planning policies that do not fall under 'sustainable places' but are still relevant to the proposed development include:

- Policy 14: Liveable Places;
- Policy 22: Flood Risk and Water Management; and
- Policy 23: Health and Safety.

### **Policy 11: Energy**

118. For the consideration of onshore wind energy development, Policy 11 is the principal policy against which the proposed development should be considered.

119. The 'policy principle' for Policy 11: Energy, is as follows:

*"To encourage, promote and facilitate all forms of renewable energy development onshore and offshore. This includes energy generation, storage, new and replacement transmission and distribution infrastructure and emerging low-carbon and zero emissions technologies including hydrogen and carbon capture utilisation and storage (CCUS)."*

120. The proposed development is a renewable energy development for the generation of electricity and as such supports the principle of Policy 11: Energy.

121. The 'policy outcome' i.e. the desired outcome that Policy 11: Energy, is designed to facilitate is the *"expansion of renewable, low-carbon and zero emissions technologies."*

122. The proposed development being a renewable energy development contributes to the desired policy outcome of Policy 11: Energy.

123. Policy 11, part 'a', states that *"Development proposals for all forms of renewable, low-carbon and zero emissions technologies will be supported"*. Wind farms are included in the list of developments that follow in the policy text and therefore, the proposed development, being a wind farm comprising 25 wind turbines, complies with part 'a' of Policy 11.

124. Policy 11, part 'b' goes on to state that *"Development proposals for wind farms in National Parks and National Scenic Areas will not be supported"*. The proposed development is outwith any National Park or National Scenic Area, and therefore complies with part 'b' of Policy 11.
125. With regards to part 'c' of Policy 11, **Chapter 14: Socio-economics, Tourism, Recreation and Land Use** of the EIA Report, details that the proposed development would result in the following:
- community benefit payments of approximately £24,750,000 over the life time of the wind farm;
  - £165 million of capital investment in Scotland;
  - £2.54 million of net Gross Value Added (GVA) to the Western Isles over the course of the three year construction period;
  - a total of 39.6 person-years of net additional temporary employment is predicted to be generated in the Western Isles economy during the construction and installation phase of the proposed project. The figure for the whole of Scotland (including the Western Isles) is 361.9 person-years of net additional temporary employment; and
  - a total of 30 permanent (direct and indirect) jobs in the Western isles.
126. Therefore the proposed development can be seen to comply with part 'c' of Policy 11, as it is predicted to have a beneficial economic impact for the Western Isles (and Scotland), through community benefit payments, capital expenditure, jobs and supply chain opportunities.
127. With regards to part d of Policy 11, the landscape and visual assessment within the EIA Report concludes that there would be moderate significant effects on one of the Special Landscape Qualities of the South Lewis, Harris and North Uist National Scenic Area, but that the objectives of designation and the overall integrity of the area will not be compromised. However, when a proposed development would impact upon a national designation, the proposals are to be assessed in relation to Policy 4: Natural Places. Policy 4, allows for support of developments that affect National Scenic Areas where *"The objectives of designation and the overall integrity of the areas will not be compromised; or Any significant adverse effects on the qualities for which the area has been designated are clearly outweighed by social, environmental or economic benefits of national importance."* It is considered that both of these tests are complied with in relation to the proposed development.
128. Part 'e' of Policy 11 requires that a proposed development demonstrates how various environmental impacts have been addressed via design and mitigation. **Table 6-1** sets out the way in which the proposed development has addressed these potential impacts. **Table 6-1** provides a summary of the significance of effects as assessed in the EIA Report as relevant, and cross references to where the relevant information can be found in the EIA Report.
129. Part 'e' of Policy 11 also states the following on the impacts assessed in **Table 6-1**:
- "In considering these impacts, significant weight will be placed on the contribution of the proposal to renewable energy generation targets and on greenhouse gas emissions reduction targets."*
130. The proposed development is of a large scale, with an anticipated capacity of 165MW. As detailed in Section 6.2.2 of this Planning Statement the proposed development therefore has national development status. As a result, the proposed development would provide a considerable contribution to renewable energy generation targets and on greenhouse gas emissions reduction targets.

**Table 6-1: Analysis of NPF4 Policy 11 Part ‘e’ against the Proposed Development**

Relevant Policy Text (Policy 11 ‘e’)	Analysis / Where Addressed in EIA Report
<p><i>Policy 11 ‘e’ ‘i’</i></p> <p><i>In addition, project design and mitigation will demonstrate how the following impacts are addressed:</i></p> <p><i>i. impacts on communities and individual dwellings, including, residential amenity, visual impact, noise and shadow flicker;</i></p>	<p><b>Technical Appendix 7.5</b> of the EIA Report assess the impact of visible aviation lighting, applied to the proposed turbines, on nearby receptors. Overall, it concludes that significant visual effects are predicted to result from the introduction of 2,000 candela visible aviation lighting for three (VP2: B8060, east of the Site, VP5: B8060 near Tabost (Habost) Church, and VP11: Liurbost) of the four representative assessment viewpoints. However, there would be a potential reduction in light intensity which may be perceived in relation to the relevant vertical elevation angle and distance at which the turbines are viewed.</p> <p>Visual impact is addressed in relation to Policy 11(e)(ii) below.</p> <p><b>Chapter 13: Noise</b> of the EIA Report sets out the methodology, assessment and subsequent findings of the noise impact assessment for the proposed development. The assessment concludes that wind turbine noise immission levels do not exceed the ESTU-R-97 criterion and thereby, the effects would be not significant.</p> <p>Potential shadow flicker effects have been considered within <b>Chapter 16: Other Issues</b> of the EIA Report. The nearest residential receptor to the proposed development is located approximately 869m from Turbine T16. The shadow flicker assessment shows that there is potential for significant shadow flicker effects to occur at seven nearby properties (all associated with Eishken Lodge and financially involved in the project) as a result of the proposed development, based on a worst-case scenario. However, the likely hours of shadow flicker predicted at these seven properties reduced to under a significant level when modelled using average sunshine hours per year at this location. Despite this, the applicant has committed to installing shadow flicker control modules on the turbines with the potential to cause shadow flicker on nearby receptors.</p>
<p><i>ii. significant landscape and visual impacts, recognising that such impacts are to be expected for some forms of renewable energy. Where impacts are localised and/or appropriate design mitigation has been applied, they will generally be considered to be acceptable;</i></p>	<p><b>Chapter 7: Landscape and Visual Amenity</b> of the EIA Report sets out the Viewpoint Assessment of the proposed development.</p> <p>Of the 18 viewpoints assessed in <b>Chapter 7: Landscape and Visual Amenity</b> of the EIA Report, significant effects are identified at twelve viewpoints (VPs 1,2,3,4,5,7,9,10,11,13,14,15) within the 45km study area.</p>

Relevant Policy Text (Policy 11 'e')	Analysis / Where Addressed in EIA Report
	<p>In views from these 12 locations, the proposed turbines would appear as evident features, sometimes seen against the skyline. Turbines would appear most evident in views from elevated locations within approximately 5km of the Site (VP3, VP7), and from relatively elevated extents of the minor road to the east of the Site (VP2) within 5km of the Site. Intervening landform would partially screen turbines from lower-lying locations within approximately 5km of the Site, though the hubs and blades of turbines would form evident features against the skyline in views from these locations (VP1, VP4, VP5). From other lower-lying (VP9, VP11, VP13, VP14) and elevated (VP10, VP15) locations within 15km, turbines form evident features, albeit in more distant views.</p> <p>The proposed development is not sited within a designated landscape. The following nationally designated landscapes were identified within the 45km Landscape and Visual Impact (LVIA) study area:</p> <ul style="list-style-type: none"> <li>• South Lewis, Harris and North Uist National Scenic Area (NSA);</li> <li>• Trotternish NSA; and</li> <li>• Wester Ross NSA.</li> </ul> <p>The assessment of effects on the Special Landscape Qualities (SLQs) of the South Lewis, Harris and North Uist NSA (<b>Technical Appendix 7.3</b>) concludes that one of the SLQs considered in the assessment would experience significant effects within localised extents of the NSA. However, extensive areas of the NSA within which this SLQ is strongly expressed will not be significantly affected by the proposed development. The proposed development would not compromise the objective of designation and the overall integrity of the South Lewis, Harris and North Uist NSA.</p> <p>There are no locally designated landscapes found across the Western Isles, whilst the closest locally designated Special Landscape Area (SLA) within the Highland region is located approximately 27km from the Site and was not included in the assessment.</p> <p>Overall, it is concluded that the visual effects of the proposed development would be limited by the design embedded mitigation and local topography, with significant effects being restricted to certain specific areas within 15km of proposed turbines.</p>

Relevant Policy Text (Policy 11 'e')	Analysis / Where Addressed in EIA Report
<p><i>iii. public access, including impact on long distance walking and cycling routes and scenic routes;</i></p>	<p><b>Chapter 7: Landscape and Visual Amenity</b> of the EIA Report includes an assessment of the visual effects that would be experienced by people when travelling along recreational / scenic routes within the study area. The routes assessed are:</p> <ul style="list-style-type: none"> <li>• Hebridean Way Walking and Cycling Routes/ NCN Route 780; and</li> <li>• Pairc Trust Steimreway Path.</li> </ul> <p>The Hebridean Way Walking and Cycling Routes/ NCN Route 780, would have intermittent visibility from approximately 14.6km of the route within 10km to the north west and north of the nearest turbine of the proposed development. The overall magnitude of change as a result of the proposed development is judged to be medium for localised sections of the road near Laxay/Lacasaigh and Acha Mor, resulting in a moderate (adverse) and significant visual effect. The magnitude of change would reduce to low for the routes as a whole and taking account of the medium sensitivity would result in a minor (adverse) and not significant visual effect for the routes as a whole.</p> <p>The Pairc Trust Steimreway Path would have sequential visibility from approximately 1.6km of the route within 2.1km to the south east of the nearest turbine of the proposed development. The magnitude of change as a result of the proposed development is judged to be large for approximately half of the route, resulting in a major (adverse) and significant visual effect.</p> <p>Public access is also considered in <b>Chapter 12: Site Access, Traffic and Transport</b> and <b>Chapter 14: Socio-economics, Tourism, Recreation and Land Use</b> of the EIA Report. There would be temporary effects on public access in and around the Site during construction (e.g. road widening and junction improvements), however once the proposed development is operation there would be no effects on public access (beyond directly accessing wind farm infrastructure such as turbines and substation compound).</p>
<p><i>iv. impacts on aviation and defence interests including seismological recording;</i></p>	<p><b>Chapter 15 Aviation</b> of the EIA Report highlights the consultation that has been carried out with key aviation related stakeholders.</p> <p><b>Technical Appendix 15.1</b> of the EIA Report sets out a proposed reduced lighting scheme for the proposed development.</p>

Relevant Policy Text (Policy 11 'e')	Analysis / Where Addressed in EIA Report
	It is considered that planning conditions relating to aviation safety and aviation lighting for the proposed development could be employed to ensure no significant effects.
<i>v. impacts on telecommunications and broadcasting installations, particularly ensuring that transmission links are not compromised;</i>	<p>Consultation has been undertaken with key stakeholders to identify relevant communications links in the vicinity of the Site.</p> <p>During the iterative design process, turbines have been moved in order to ensure that there would be no interference to identified communications links as a result of the proposed development.</p>
<i>vi. impacts on road traffic and on adjacent trunk roads, including during construction;</i>	<p><b>Chapter 12: Site Access, Traffic and Transport</b> of the EIA Report assesses the potential effects of increased traffic flows in the study area, arising from the construction and operation of the proposed development.</p> <p>No significant effects are predicted related to site access, traffic and transport as a result of construction or operation of the proposed development. An outline Construction Traffic Management Plan (CTMP) has been prepared and is included within <b>Technical Appendix 12.1</b> of the EIA Report which outlines mitigation measures recommended to be implemented during the construction phase.</p> <p>The outline CTMP will be supplemented with additional information as appropriate by the applicant's appointed contractor(s), prior to commencement of construction activities. Should consent be granted, the outline CTMP would be updated to a CTMP, the content of which would be agreed with CnES through consultation and enforced via a planning condition. The CTMP would be used during the construction phase of the proposed development to ensure traffic to, from and on the site is properly managed. It is possible that a collaborative approach with the assessed cumulative sites may be incorporated as part of the CTMP at a later date.</p>
<i>vii. impacts on historic environment;</i>	The historic environment is discussed in further detail under NPF4 Policy 7 below ( <b>Table 6-2</b> ). However, in summary No significant effects are predicted as a result of the proposed development.
<i>viii. effects on hydrology, the water environment and flood risk;</i>	<p><b>Chapter 10: Hydrology, Hydrogeology and Geology</b> of the EIA Report has assessed potential effects arising from construction and operation of the proposed development within 1km of the Site boundary.</p> <p>It has been concluded that following the imposition of good practice measures and as a result of iterative design, that the proposed development is not likely to have any significant effects on the study area's hydrological or hydrogeological receptors.</p>



Relevant Policy Text (Policy 11 'e')	Analysis / Where Addressed in EIA Report
<p><i>ix. biodiversity including impacts on birds;</i></p>	<p>Biodiversity is discussed in further detail under Policy 3 below (<b>Table 6-2</b>). However, in summary no significant effects on ecology or ornithology have been predicted once proposed mitigation is applied. Proposed mitigation includes blanket bog and wet heath restoration, and a programme of post-construction bird monitoring.</p>
<p><i>x. impacts on trees, woods and forests;</i></p>	<p>No trees are proposed to be felled as part of the proposed development.</p>
<p><i>xi. proposals for the decommissioning of developments, including ancillary infrastructure, and site restoration;</i></p>	<p>It is proposed that Uisenis Wind Farm would be operational for a period of up to 30 years, subject to receiving consent.</p> <p>At the end of its operational life, the proposed development and ancillary infrastructure would be decommissioned unless an application is submitted and approved to extend the operational period or to repower the wind farm.</p> <p>The ultimate decommissioning protocol would be agreed with CnES and other appropriate regulatory authorities in line with best practice guidance and requirements of the time. This would be done through the preparation and agreement of a Decommissioning and Restoration Plan (DRP).</p>
<p><i>xii. the quality of site restoration plans including the measures in place to safeguard or guarantee availability of finances to effectively implement those plans;</i></p>	<p>Proposals for site restoration post construction are set out in <b>Technical Appendix 3.1 (CEMP)</b> of the EIA Report.</p> <p>It is anticipated that most of the soil resources within areas directly affected by construction activities would be able to be stored and reinstated as close as possible to where they were excavated in accordance with best practice; so that the Site would be restored with minimal movement of material from its original location.</p> <p>Site restoration at the end of the operational life of the wind farm has been discussed in relation to Policy 11(e)(xi). It is expected that a DRP would be prepared in liaison with CnES and regulatory authorities at the time of decommissioning and that a financial provision for decommissioning would be provided. It is expected that a planning condition would be applied to any consent in this regard.</p>

Relevant Policy Text (Policy 11 'e')	Analysis / Where Addressed in EIA Report
<p><i>xiii. cumulative impacts.</i></p>	<p>In accordance with the EIA Regulations, the assessment has considered 'cumulative effects' in relation to the topics of landscape and visual, noise, traffic and transport, ornithology and cultural heritage.</p> <p>A list of cumulative developments is provided in paragraph 5.41 in <b>Chapter 5: Environmental Impact Assessment</b> of the EIA Report. No significant cumulative effects have been identified arising from the proposed development along with other operational, consented and submitted developments.</p>

**Other Relevant NPF4 Policies**

131. The other NPF4 policies that are relevant to the proposed development are considered in turn in **Table 6-2** below. As set out in Annex A of NPF4, the weight to be attached to policies is a matter for the decision maker.

**Table 6-2: Analysis of Other Relevant OHLDP Policies Against the Proposed Development**

Policy	Relevant Policy Text (summarised where necessary)	Analysis / Where Addressed in EIA Report
<p><b>Policy 1: Tackling the climate and nature crises</b></p>	<p><i>When considering all development proposals significant weight will be given to the global climate and nature crises.</i></p>	<p>The proposed development would produce an average of approximately 578,160 Mega Watt hours (MWh) of electricity annually (which corresponds to a capacity factor of 40%). This equates to the power consumed by approximately 164,764 average UK households.</p> <p>It is anticipated that the proposed development would be connected to the grid in 2030 and would therefore make a meaningful contribution to the Scottish Government target for a minimum installed capacity of 20GW of onshore wind by 2030 and net zero by 2045, key timescales for the Scottish Government.</p> <p>The carbon calculator which accompanies the EIA Report as <b>Technical Appendix 16.1</b> predicts that the proposed development would displace 7.49 million tonnes of CO<sub>2</sub> over the lifetime of the wind farm (assumed to be 30 years). It is expected that the overall payback time of a wind farm of the scale and installed capacity as the proposed development would be approximately 1.5 years when compared to a fossil fuel mix of energy generation.</p> <p>With regard to the ‘nature crises’ the findings of the EIA Report related to Ecology and Ornithology are relevant. The Ornithology assessment has concluded that subject to mitigation measures and best practice techniques being implemented on Site, there would be no significant effects upon important ornithological features during the construction, operation or decommissioning of the proposed development.</p> <p>With regard to ecology, a programme of peatland restoration has been proposed as part of an outline HMP in order to compensate for the habitat loss of peatland and heathland habitat as a result of the proposed development.</p>

Policy	Relevant Policy Text (summarised where necessary)	Analysis / Where Addressed in EIA Report
<p><b>Policy 2: Climate mitigation and adaptation</b></p>	<p><i>a) Development proposals will be sited and designed to minimise lifecycle greenhouse gas emissions as far as possible.</i></p> <p><i>b) Development proposals will be sited and designed to adapt to current and future risks from climate change.</i></p>	<p>As a wind farm, the proposed development would act to reduce greenhouse gas emissions from electricity production.</p> <p>The carbon calculator which accompanies the EIA Report as <b>Technical Appendix 15.1</b> predicts that the proposed development would displace 7.49 million tonnes of CO<sub>2</sub> over the lifetime of the wind farm (assumed to be 30 years). It is expected that the overall payback time of a wind farm of the scale and installed capacity as the proposed development would be approximately 1.5 years when compared to a fossil fuel mix of energy generation.</p> <p>As a wind farm, the proposed development would act to reduce future risks to the Western Isles and the UK as a whole, from climate change.</p>
<p><b>Policy 3: Biodiversity</b></p>	<p><i>a) Development proposals will contribute to the enhancement of biodiversity, including where relevant, restoring degraded habitats and building and strengthening nature networks and the connections between them. Proposals should also integrate nature-based solutions, where possible.</i></p> <p><i>b) Development proposals for national or major development, or for development that requires an Environmental Impact Assessment will only be supported where it can be demonstrated that the proposal will conserve, restore and enhance biodiversity, including nature networks so they are in a demonstrably better state than without intervention. This will include future management. To inform this, best practice assessment methods should be used. Proposals within these categories will demonstrate how they have met all of the following criteria:</i></p> <p><i>i) the proposal is based on an understanding of the existing characteristics of the site and its local, regional and national ecological context prior to development, including the presence of any irreplaceable habitats;</i></p>	<p>Due to the majority of the Site comprising Annex 1 habitat, it was not possible to avoid these areas during the design of the proposed development however, flush habitats, watercourses, areas of deepest peat and sensitive bog pool habitat have been avoided as far as possible and track length was minimised as far as possible to minimise land take.</p> <p>Nevertheless, a significant negative effect (prior to mitigation and restoration proposals) has been predicted from construction of the proposed development related to the permanent loss of up to 41ha of Annex 1 blanket bog habitat and up to 34ha of Annex 1 heathland habitat. In order to compensate for the habitat loss, approximately 50ha would be targeted for blanket bog restoration, and 34ha targeted for wet heath restoration as part of an HMP.</p> <p>An outline HMP (<b>Technical Appendix 8.5</b>) outlines aims and objectives in relation to the proposed peatland restoration. The effectiveness of the restoration would be monitored to establish if any remedial action is required. This would ensure that the adopted habitat enhancement actions are measurable against biodiversity gain.</p>

Policy	Relevant Policy Text (summarised where necessary)	Analysis / Where Addressed in EIA Report
	<p>ii) <i>wherever feasible, nature-based solutions have been integrated and made best use of;</i></p> <p>iii) <i>an assessment of potential negative effects which should be fully mitigated in line with the mitigation hierarchy prior to identifying enhancements;</i></p> <p>iv) <i>significant biodiversity enhancements are provided, in addition to any proposed mitigation. This should include nature networks, linking to and strengthening habitat connectivity within and beyond the development, secured within a reasonable timescale and with reasonable certainty. Management arrangements for their long-term retention and monitoring should be included, wherever appropriate; and</i></p> <p>v) <i>local community benefits of the biodiversity and/or nature networks have been considered.</i></p> <p>d) <i>Any potential adverse impacts, including cumulative impacts, of development proposals on biodiversity, nature networks and the natural environment will be minimised through careful planning and design. This will take into account the need to reverse biodiversity loss, safeguard the ecosystem services that the natural environment provides, and build resilience by enhancing nature networks and maximising the potential for restoration.</i></p>	<p>With regard to ornithology, the assessment of effects concluded that, with the implementation of good practice measures, there would be no significant effects predicted on Important Ornithological Features as a result of the proposed development. Good practice measures would be employed to reduce the possibility of damage and destruction (and disturbance in the case of sensitive species such as breeding raptors and waders), to occupied bird nests during the construction phase.</p> <p>A programme of post-construction bird monitoring (including collision monitoring, flight activity surveys, breeding raptor surveys and carcass searching) is proposed in liaison with the adjacent consented wind farms to gather valuable data.</p>

Policy	Relevant Policy Text (summarised where necessary)	Analysis / Where Addressed in EIA Report
<p><b>Policy 4: Natural Places</b></p>	<p><i>a) Development proposals which by virtue of type, location or scale will have an unacceptable impact on the natural environment, will not be supported.</i></p> <p><i>b) Development proposals that are likely to have a significant effect on an existing or proposed European site (Special Area of Conservation or Special Protection Areas) and are not directly connected with or necessary to their conservation management are required to be subject to an “appropriate assessment” of the implications for the conservation objectives.</i></p> <p><i>c) Development proposals that will affect a National Park, National Scenic Area, Site of Special Scientific Interest or a National Nature Reserve will only be supported where:</i></p> <p><i>i) The objectives of designation and the overall integrity of the areas will not be compromised; or</i></p> <p><i>ii) Any significant adverse effects on the qualities for which the area has been designated are clearly outweighed by social, environmental or economic benefits of national importance.</i></p> <p><i>d) Development proposals that affect a site designated as a local nature conservation site or landscape area in the LDP will only be supported where:</i></p> <p><i>i) Development will not have significant adverse effects on the integrity of the area or the qualities for which it has been identified; or</i></p>	<p>Potential effects on SACs and SSSIs have been scoped out of assessment as the features that these sites have been designated for are not predicted to be impacted by the proposed development. Further information on this is available in <b>Chapter 8: Ecology</b> and <b>Chapter 9: Ornithology</b> of the EIA Report.</p> <p>The Site is not located with a National Park and the study area for the Proposed development does not include a National Park.</p> <p>No non-statutory designated sites for nature conservation have been identified within a 5km radius of the site and were scoped out of assessment as they are considered unlikely to be affected by the proposed development.</p> <p>As set out in <b>Chapter 8: Ecology</b> and <b>Chapter 9: Ornithology</b>, with the imposition of recommended mitigation measures, no significant adverse effects on protected species are predicted as a result of the proposed development.</p> <p>The proposed development is not sited within a designated landscape. The following nationally designated landscapes were identified within the 45km Landscape and Visual Impact (LVIA) study area:</p> <ul style="list-style-type: none"> <li>• South Lewis, Harris and North Uist NSA;</li> <li>• Trotternish NSA; and</li> <li>• Wester Ross NSA.</li> </ul> <p>Effects on the Special Landscape Qualities (SLQs) of the South Lewis, Harris and North Uist NSA were assessed in accordance with draft NatureScot guidance, as detailed within <b>Technical Appendix 7.3: Assessment of Effects on Special Landscape Qualities</b>. One of the SLQs considered in the assessment was judged to experience significant effects within localised extents of the NSA. However, extensive areas of the NSA within which this SLQ is strongly expressed will not be significantly affected by the proposed development. The proposed development would not compromise the objective of designation or the overall integrity of the South Lewis, Harris and North Uist NSA.</p>

Policy	Relevant Policy Text (summarised where necessary)	Analysis / Where Addressed in EIA Report
	<p>ii) <i>Any significant adverse effects on the integrity of the area are clearly outweighed by social, environmental or economic benefits of at least local importance.</i></p> <p><i>“f) Development proposals that are likely to have an adverse effect on species protected by legislation will only be supported where the proposal meets the relevant statutory tests. If there is reasonable evidence to suggest that a protected species is present on a site or may be affected by a proposed development, steps must be taken to establish its presence. The level of protection required by legislation must be factored into the planning and design of development, and potential impacts must be fully considered prior to the determination of any application.</i></p> <p><i>g) Development proposals in areas identified as wild land in the Nature Scot Wild Land Areas map will only be supported where the proposal:</i></p> <p><i>i) will support meeting renewable energy targets; or,</i></p> <p><i>ii) is for small scale development directly linked to a rural business or croft, or is required to support a fragile community in a rural area.</i></p>	<p>There are no locally designated landscapes found across the Western Isles, whilst the closest locally designated Special Landscape Area (SLA) within the Highland region is approximately 27km from the Site and was not included in the assessment.</p> <p>The Site is not located within a NatureScot Wild Land Area (WLA). Eisgein WLA (31) is located less than 0.5km south west of the proposed development. <b>Technical Appendix 7.4</b> assesses the impact of the proposed development on the wild land qualities of the Eisgein WLA (31). Due to the proximity to this WLA, <b>Technical Appendix 7.4</b> judges that there would be Significant effects on two of the wild land qualities of the WLA within a localised extent of the WLA. It is considered that these effects would not affect the overall integrity of the WLA and would not undermine the objectives for its protection. However, NPF4 makes clear that buffer zones around wild land areas will not be applied, and effects of developments that are outwith WLAs will not be a significant consideration.</p>



Policy	Relevant Policy Text (summarised where necessary)	Analysis / Where Addressed in EIA Report
	<p><i>All such proposals must be accompanied by a wild land impact assessment which sets out how design, siting, or other mitigation measures have been and will be used to minimise significant impacts on the qualities of the wild land, as well as any management and monitoring arrangements where appropriate. Buffer zones around wild land will not be applied, and effects of development outwith wild land areas will not be a significant consideration.</i></p>	
<p><b>Policy 5: Soils</b></p>	<p><i>a) Development proposals will only be supported if they are designed and constructed:</i></p> <p><i>i) In accordance with the mitigation hierarchy by first avoiding and then minimising the amount of disturbance to soils on undeveloped land; and</i></p> <p><i>ii) In a manner that protects soil from damage including from compaction and erosion, and that minimises soil sealing.</i></p> <p><i>c) Development proposals on peatland, carbon-rich soils and priority peatland habitat will only be supported for:</i></p> <p><i>i) Essential infrastructure and there is a specific locational need and no other suitable site;</i></p> <p><i>ii) The generation of energy from renewable sources that optimises the contribution of the area to greenhouse gas emissions reductions targets;</i></p> <p><i>iii) Small-scale development directly linked to a rural business, farm or croft;</i></p> <p><i>iv) Supporting a fragile community in a rural or island area; or</i></p> <p><i>v) Restoration of peatland habitats.</i></p>	<p>The entire Site can be considered to be extensively covered in peat particularly on the flatter areas. Peat presence, thickness and stability has formed a key consideration in the design of the proposed development.</p> <p>An extensive programme of peat probing has been undertaken across the Site to assess the depth and stability of carbon rich soils. This has been supplemented by a walk-over survey and a thorough inspection of digital terrain mapping and aerial photography. An ecological assessment of peat and its associated habitats has also been completed.</p> <p>At various points during design development, fieldwork has been undertaken to provide feedback to the project team with regards to peat depth and stability at locations of proposed infrastructure which fed into the iterative design of the proposed development.</p> <p>In accordance with the mitigation hierarchy and the inability to totally avoid peat, the design principle followed for the proposed development has been to try to avoid locating infrastructure in areas of peat greater than 1m. Where this has not been possible (mainly in siting onsite tracks), mitigation has been proposed e.g. floated tracks where applicable. The depth of peat at the proposed turbine locations varies from 0.1m to 0.9m.</p>

Policy	Relevant Policy Text (summarised where necessary)	Analysis / Where Addressed in EIA Report
	<p><i>d) Where development on peatland, carbon-rich soils or priority peatland habitat is proposed, a detailed site specific assessment will be required to identify:</i></p> <p><i>i) the baseline depth, habitat condition, quality and stability of carbon rich soils;</i></p> <p><i>ii) the likely effects of the development on peatland, including on soil disturbance; and</i></p> <p><i>iii) the likely net effects of the development on climate emissions and loss of carbon.</i></p> <p><i>This assessment should inform careful project design and ensure, in accordance with relevant guidance and the mitigation hierarchy, that adverse impacts are first avoided and then minimised through best practice. A peat management plan will be required to demonstrate that this approach has been followed, alongside other appropriate plans required for restoring and/ or enhancing the site into a functioning peatland system capable of achieving carbon sequestration.</i></p>	<p>In addition, all turbine locations, access tracks, the substation compound, the construction compounds and borrow pits have been designed to avoid any areas which may be subject to peat slide risk. Or where not possible, appropriate mitigation is proposed. This is discussed in <b>Technical Appendix 10.1: Peat Stability Assessment</b> of the EIA Report and shown on <b>Figures 10.1.6 and 10.1.7 of Technical Appendix 10.1.</b></p> <p>An assessment of the likely impacts of the proposed development on peat is contained within <b>Chapter 10: Hydrology, Hydrogeology and Geology</b> of the EIA Report. It concludes that subject to best practice construction techniques being implemented, impacts on soils are not considered to be significant.</p> <p>Measures have been proposed to ensure the stability of peat and carbon rich soils and that peat and soils that would be disturbed by the proposed development can be safeguarded and beneficially re-used on site. These measures are set out in <b>Technical Appendix 10.1 (PLHRA)</b> and <b>10.2 (PMP)</b> of the EIA Report.</p> <p>The results of the carbon calculator conclude that the proposed development is expected to have an overall net positive impact over its 30 year lifespan and is expected to generate 28.5 years of carbon-free energy which would result in 7.49 million tonnes of CO<sub>2</sub> emissions savings compared to a fossil fuel mix of electricity generation.</p> <p>In addition, restoration of peatland habitats is proposed as part of the proposed development. Habitat restoration proposals involve the restoration of approximately 40ha of blanket bog habitat.</p>

Policy	Relevant Policy Text (summarised where necessary)	Analysis / Where Addressed in EIA Report
<p><b>Policy 7: Historic Assets and Places</b></p>	<p><i>a) Development proposals with a potentially significant impact on historic assets or places will be accompanied by an assessment which is based on an understanding of the cultural significance of the historic asset and/or place. The assessment should identify the likely visual or physical impact of any proposals for change, including cumulative effects and provide a sound basis for managing the impacts of change.</i></p> <p><i>Proposals should also be informed by national policy and guidance on managing change in the historic environment, and information held within Historic Environment Records.</i></p> <p><i>h) Development proposals affecting scheduled monuments will only be supported where:</i></p> <p><i>i) direct impacts on the scheduled monument are avoided;</i></p> <p><i>ii) significant adverse impacts on the integrity of the setting of a scheduled monument are avoided; or</i></p> <p><i>iii) exceptional circumstances have been demonstrated to justify the impact on a scheduled monument and its setting and impacts on the monument or its setting have been minimised.</i></p>	<p><b>Chapter 11: Cultural Heritage and Archaeology</b> of the EIA Report assesses the effects of construction and operation of the proposed development on the cultural heritage assets of the Site and surrounding area. This assessment has determined that there would be no direct impacts on Scheduled Monuments and that the changes in setting would not have a significant adverse effect on the integrity of the setting of any Scheduled Monuments.</p> <p>Due to distance, an assessment on the effects on nationally important Gardens and Designed Landscapes have not been undertaken for the proposed development.</p> <p>There are no Historic Battlefields within the study area for the proposed development. They have been scoped out of assessment on this basis.</p> <p>There is potential for a direct impact on two non-designated cultural heritage assets within the Site boundary although these have been avoided through careful design. It should be noted that these assets are considered to be of low cultural significance.</p> <p>As a result, there is not predicted to be significant effects as a result of proposed development on non-designated historic environment assets within the Site.</p> <p>Mitigation measures have been proposed including fencing off and avoidance of the three known assets to reduce the potential of accidental damage during construction and a targeted watching brief during groundworks adjacent to four of the known assets.</p> <p>The archaeological mitigation measures proposed would minimise the potential loss of the archaeological resource that could occur as a result of the construction of the proposed development. Any harm caused to buried remains would be offset by the gain in knowledge resulting from investigation and reporting.</p>

Policy	Relevant Policy Text (summarised where necessary)	Analysis / Where Addressed in EIA Report
	<p><i>i) Development proposals affecting nationally important Gardens and Designed Landscapes will be supported where they protect, preserve or enhance their cultural significance, character and integrity and where proposals will not significantly impact on important views to, from and within the site, or its setting.</i></p> <p><i>j) Development proposals affecting nationally important Historic Battlefields will only be supported where they protect and, where appropriate, enhance their cultural significance, key landscape characteristics, physical remains and special qualities.</i></p> <p><i>o) Non-designated historic environment assets, places and their setting should be protected and preserved in situ wherever feasible. Where there is potential for non-designated buried archaeological remains to exist below a site, developers will provide an evaluation of the archaeological resource at an early stage so that planning authorities can assess impacts. Historic buildings may also have archaeological significance which is not understood and may require assessment.</i></p>	

Policy	Relevant Policy Text (summarised where necessary)	Analysis / Where Addressed in EIA Report
<p><b>Policy 10: Coastal Development</b></p>	<p><i>a) Development proposals in developed coastal areas will only be supported where the proposal:</i></p> <ul style="list-style-type: none"> <li><i>i. does not result in the need for further coastal protection measures taking into account future sea level change; or increase the risk to people of coastal flooding or coastal erosion, including through the loss of natural coastal defences including dune systems; and</i></li> <li><i>ii. is anticipated to be supportable in the long-term, taking into account projected climate change.</i></li> </ul> <p><i>b) Development proposals in undeveloped coastal areas will only be supported where they:</i></p> <ul style="list-style-type: none"> <li><i>i. are necessary to support the blue economy, net zero emissions or to contribute to the economy or wellbeing of communities whose livelihood depend on marine or coastal activities, or is for essential infrastructure, where there is a specific locational need and no other suitable site;</i></li> <li><i>ii. do not result in the need for further coastal protection measures taking into account future sea level change; or increase the risk to people of coastal flooding or coastal erosion, including through the loss of natural coastal defences including dune systems; and</i></li> <li><i>iii. are anticipated to be supportable in the long-term, taking into account projected climate change; or</i></li> <li><i>iv. are designed to have a very short lifespan.</i></li> </ul> <p><i>d) Where a design statement is submitted with any planning application that may impact on the coast it will take into account, as appropriate, long-term coastal vulnerability and resilience.</i></p>	<p><b>Chapter 10: Hydrology, Hydrogeology and Geology</b> considers the hydrology and flood risk at the Site as a result of the proposed development.</p> <p>The Site for the proposed development is considered to be at minor risk from fluvial and surface water flooding. With the exception of proposed watercourse crossings no development is proposed in the published floodplain identified by SEPA in relation to fluvial flooding. SEPA have identified several areas of surface water flood risk across in the study area, however flood extents are localised, never forming large, linked areas or flow paths, and therefore surface water is not considered a development constraint.</p> <p>The proposed development would not result in the need for further coastal protection measures as a result of climate change or an increased risk to people from coastal flooding or coastal erosion.</p> <p>The proposed development would operate for a period of 30 years, during which time it would produce clean, renewable electricity. This would help in the decarbonisation of Scotland’s energy sector and in turn be beneficial in reducing the effects of climate change.</p> <p>The proposed development would support the Scottish Government aim of ‘net zero’ by 2045.</p>

Policy	Relevant Policy Text (summarised where necessary)	Analysis / Where Addressed in EIA Report
<p><b>Policy 14: Design, Quality and Place</b></p>	<p>a) <i>Development proposals will be designed to improve the quality of an area whether in urban or rural locations and regardless of scale.</i></p> <p>b) <i>Development proposals will be supported where they are consistent with the six qualities of successful places:</i>  <b>Healthy:</b> <i>Supporting the prioritisation of women’s safety and improving physical and mental health.</i>  <b>Pleasant:</b> <i>Supporting attractive natural and built spaces.</i>  <b>Connected:</b> <i>Supporting well connected networks that make moving around easy and reduce car dependency</i>  <b>Distinctive:</b> <i>Supporting attention to detail of local architectural styles and natural landscapes to be interpreted, literally or creatively, into designs to reinforce identity.</i>  <b>Sustainable:</b> <i>Supporting the efficient use of resources that will allow people to live, play, work and stay in their area, ensuring climate resilience, and integrating nature positive, biodiversity solutions.</i>  <b>Adaptable:</b> <i>Supporting commitment to investing in the long-term value of buildings, streets and spaces by allowing for flexibility so that they can be changed quickly to accommodate different uses as well as maintained over time.</i>  <i>Further details on delivering the six qualities of successful places are set out in Annex D.</i></p> <p>c) <i>Development proposals that are poorly designed, detrimental to the amenity of the surrounding area or inconsistent with the six qualities of successful places, will not be supported.</i></p>	<p>The proposed development would be consistent with the highlighted qualities of successful places, primarily through facilitating the Isle of Lewis becoming a ‘sustainable’ place, including improving climate resilience.</p> <p>The proposed development has been designed in order to minimise views from key locations e.g. Calanais Stones and settlements such as Lacasaigh and Balallan. The design of the proposed development therefore retains the pleasant and distinctive qualities from these key viewpoints.</p> <p>The proposed development includes an annual community benefit payment of £5,000 per MW, equating to £825,000 per year or £24,750,000 over the proposed 30 year life of the wind farm. This community benefit fund could help support initiatives in the surrounding areas that would be consistent with the highlighted qualities of successful places.</p>

<p><b>Policy 22: Flood Risk and Water Management</b></p>	<p>a) Development proposals at risk of flooding or in a flood risk area will only be supported if they are for:</p> <ul style="list-style-type: none"><li>i. essential infrastructure where the location is required for operational reasons;</li><li>ii. water compatible uses;</li><li>iii. redevelopment of an existing building or site for an equal or less vulnerable use; or.</li><li>iv. redevelopment of previously used sites in built up areas where the LDP has identified a need to bring these into positive use and where proposals demonstrate that longterm safety and resilience can be secured in accordance with relevant SEPA advice.</li></ul> <p>The protection offered by an existing formal flood protection scheme or one under construction can be taken into account when determining flood risk. In such cases, it will be demonstrated by the applicant that:</p> <ul style="list-style-type: none"><li>• all risks of flooding are understood and addressed;</li><li>• there is no reduction in floodplain capacity, increased risk for others, or a need for future flood protection schemes;</li><li>• the development remains safe and operational during floods;</li><li>• flood resistant and resilient materials and construction methods are used; and</li><li>• future adaptations can be made to accommodate the effects of climate change.</li></ul> <p>Additionally, for development proposals meeting criteria part iv), where flood risk is managed at the site rather than avoided these will also require:</p> <ul style="list-style-type: none"><li>• the first occupied/utilised floor, and the underside of the development if relevant, to be above the flood risk</li></ul>	<p><b>Chapter 10: Hydrology, Hydrogeology and Geology</b> considers the hydrology and flood risk at the Site as a result of the proposed development.</p> <p>The Site for the proposed development is considered to be at minor risk from fluvial and surface water flooding. With the exception of proposed watercourse crossings no development is proposed in the published floodplain identified by SEPA in relation to fluvial flooding. SEPA have identified several areas of surface water flood risk across in the study area, however flood extents are localised, never forming large, linked areas or flow paths, and therefore surface water is not considered a development constraint.</p>
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	<p>level and have an additional allowance for freeboard; and</p> <ul style="list-style-type: none"><li>• that the proposal does not create an island of development and that safe access/egress can be achieved.</li></ul> <p><i>“c) Development proposals will:</i></p> <p><i>i. not increase the risk of surface water flooding to others, or itself be at risk.</i></p> <p><i>ii. manage all rain and surface water through sustainable urban drainage systems (SUDS), which should form part of and integrate with proposed and existing blue-green infrastructure. All proposals should presume no surface water connection to the combined sewer;</i></p> <p><i>iii. seek to minimise the area of impermeable surface.”</i></p>	
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Policy	Relevant Policy Text (summarised where necessary)	Analysis / Where Addressed in EIA Report
<b>Policy 23: Health and Safety</b>	<i>e) Development proposals that are likely to raise unacceptable noise issues will not be supported. The agent of change principle applies to noise sensitive development. A Noise Impact Assessment may be required where the nature of the proposal or its location suggests that significant effects are likely.</i>	Commentary in relation to noise is set out against Policy 11(e) (in <b>Table 6-1</b> ). It states that no unacceptable effects in terms of noise would be introduced by the proposed development.

## 6.3 Outer Hebrides Local Development Plan & Supplementary Guidance

132. The statutory presumption in favour of development that complies with the terms of the Development Plan under the Town and Country Planning (Scotland) Act 1997 does not apply either to the Section 36 determination or the grant of any deemed planning permission. As such, there is no requirement for the determination to be made in accordance with the Local Development Plan unless material considerations indicate otherwise. However, it is acknowledged that the relevant provisions of the Local Development Plan are a consideration in relation to the Section 36 determination process, with the decision maker determining the weight to be attached to each of the relevant considerations.
133. The Local Development Plan for the proposed development comprises the adopted Outer Hebrides Local Development Plan (OHLDP) (2018) and relevant supplementary guidance, including the Supplementary Guidance for Wind Energy Development.
134. The primary OHLDP policy for assessment of the proposed development is Policy E18: Energy and Heat Resources. In addition, the OHLDP includes a number of other policies relating to environmental and design considerations including:
- DS1: Development Strategy;
  - PD2: Car Parking and Roads Layout;
  - PD5: Open Space and Outdoor Sports Facilities;
  - PD6: Compatibility of Neighbouring Uses;
  - ED5: Minerals;
  - EI1: Flooding;
  - EI2: Water and Waste Water;
  - EI3: Water Environment;
  - EI5: Soils;
  - EI7: Countryside and Coastal Access;
  - EI9: Transport Infrastructure;
  - EI11: Safeguarding;
  - EI12: Developer Contributions;
  - NBH1: Landscape;
  - NBH2: Natural Heritage;
  - NBH3: Trees and Woodland;
  - NBH4: Built Heritage;
  - NBH5: Archaeology; and
  - NBH6: Historic Areas.

### 6.3.1 Policy E18: Energy and Heat Resources

135. Policy E18 states the following:

*“The Comhairle will support proposals that contribute to meeting the targets and objectives of the National Planning Framework 3, the Climate Change Act, and the National Renewables Infrastructure Plan in relation to electricity grid reinforcement, infrastructure and renewable energy generation.”*

136. The proposed development is located in an ‘Area of Constraint’ according to Map 1 of the Supplementary Guidance for Wind Energy Development. The majority of the northern half of the Isle of Lewis is mapped as an ‘Area of Constraint’ (with Harris and the southern half of Lewis mapped as ‘Areas unacceptable for Wind Farms’). Despite the proposed development being located in an ‘Area of Constraint’, this does not make it unacceptable for wind farm development, with Policy EI8 stating:

*“The Comhairle will also consider wind farm development in Areas of Constraint, with potential in certain circumstances (Map 1) subject to a satisfactory assessment against other policies in this plan and the Supplementary Guidance.”*

137. Policy EI8 states:

*“Development proposals for all scales of onshore wind energy development will be assessed against the Supplementary Guidance for Wind Energy Development.”*

### 6.3.2 Supplementary Guidance for Wind Energy Development

138. The Supplementary Guidance for Wind Energy Development was adopted in November 2021. The Introduction section of this supplementary guidance states the following:

*“The decarbonisation of Scotland’s electricity sector has been driven by our rich natural resources, a supportive approach to planning, a drive to involve local communities in decisions that affect them, supportive market frameworks, and rapidly declining prices of renewable technology globally - with wind and solar now the lowest cost forms of new generation.*

*The Outer Hebrides can be at the forefront of the transition to low carbon energy and will play their part in the Scottish Government’s Climate Change Plan to reduce Scotland’s emissions. The first National Islands Plan Plana Nàiseanta nan Eilean (2019) contains a number of Strategic Objectives, the ninth Objective includes the following commitments:*

- *create net zero emission islands and provide global climate change leadership;*
- *unleash the potential of renewable energy as both a way to mitigate climate change and as a driver of sustainable and inclusive economic growth.”*

139. **Table 6-3** sets out an assessment of the proposed development against the Supplementary Guidance for Wind Energy Development Policies.

**Table 6-3: Analysis of the Proposed Development against the Supplementary Guidance for Wind Energy Development**

Policy	Assessment Summary and Where Addressed in EIA Report
<p><b>Economic Impacts and Benefits</b></p>	<p>Addressed in <b>Chapter 14: Socio-economics, Tourism, Recreation and Land Use</b> of the EIA Report.</p> <p>Section 3.3 of this Planning Statement summarises the key economic impacts and benefits associated with the proposed development.</p> <p>The assessment in the EIA Report concludes, in terms of net economic effects as a result of the proposed development, the following:</p> <p>The additional boost to net local employment is expected to average 13.2 workforce jobs annually (during construction) if the project is permitted and delivered as intended by the developer. It is estimated that there is likely to be between five and nine permanent direct local jobs created by the project during its operational phase, and it is expected that there is likely to be between 20 and 25 overall indirect local jobs created by operational and maintenance supply chain effects associated with the proposed project.</p> <p>A net additional total of £2.54 million of Gross Value Added is predicted to be generated by the project in the local economy during the development, construction, and commissioning phase. The average annual net increment is expected to amount to £0.85 million for the local economy. As of 2020, the estimated annual value of output generated within the local economy was approximately £580 million (ONS, 2020). The temporary augmentation of the local economy by around £0.85 million p.a. would increase the size of the local economy by around 0.15%.</p> <p>Construction Phase Effects:</p> <ul style="list-style-type: none"> <li>• Local Economy – Minor (Beneficial) Effect;</li> <li>• Labour Market – Minor (Beneficial) Effect;</li> <li>• Tourist Economy – Minor (Beneficial) Effect;</li> <li>• Land Use – Minor (Adverse) Effect;</li> <li>• Loss of Amenity to Formal Recreational Assets – Minor (Adverse) Effect, once mitigation applied;</li> <li>• Footpaths – Minor (Adverse) Effect;</li> <li>• Long Distance Routes – Negligible Effect;</li> <li>• National Cycle Network – Negligible Effect;</li> <li>• Accommodation – Minor (Adverse) Effect, once mitigation applied; and</li> <li>• Bird Watching – Minor (Adverse) Effect.</li> </ul>

Policy	Assessment Summary and Where Addressed in EIA Report
	<p>Operational Phase Effects:</p> <ul style="list-style-type: none"> <li>• Labour Market – Minor (Beneficial) Effect;</li> <li>• Footpaths – Minor (Adverse) Effect;</li> <li>• Accommodation – Minor (Adverse) Effect; and</li> <li>• Loss of Amenity to Formal Recreational Assets – Minor (Adverse) Effect.</li> </ul>
<p><b>Landscape and Visual Impact</b></p>	<p>Addressed in <b>Chapter 7: Landscape and Visual Amenity</b> of the EIA Report.</p> <p>The proposed development is not located within an NSA or a Wild Land Area. Proposed turbines are not located within 2km of any settlements (nearest properties are Eishken Lodge and associated properties, all of which are financially involved in the project).</p> <p>The assessment in the EIA Report concluded the following:                      No significant adverse effects, as a result of the proposed development were predicted for any of the landscape character types (whereby each was assessed as a whole), however significant landscape effects are predicted for localised extents of five of the LCTS (LCTs 326, 323, 322, 319, 318) and the Low Rocky Island Coasts CCT.</p> <p>Of the 18 viewpoints assessed in <b>Chapter 7: Landscape and Visual Amenity</b> of the EIA Report, significant effects are identified at twelve viewpoints within the 45km study area.</p> <p>Due to the proposed reduced lighting scheme, which includes medium intensity ‘steady’ red (2,000 candela) lights on the nacelles of seven turbines only, significant landscape and visual effects associated with aviation lighting (assessment included in <b>Technical Appendix 7.5</b>) are judged to be limited. Significant visual effects are predicted to result from the introduction of 2,000 candela visible aviation lighting for three (VP2: B8060, east of the Site, VP5: B8060 near Tabost (Habost) Church, VP11: Liurbost) of the four representative assessment viewpoints. However, effects may be reduced when considering the potential reduction in light intensity which may be perceived in relation to the relevant vertical elevation angle and distance at which they are viewed, and also weather conditions.</p>

Policy	Assessment Summary and Where Addressed in EIA Report
<p><b>Aviation and Defence</b></p>	<p>Addressed in <b>Chapter 15: Aviation</b> of the EIA Report.</p> <p>The assessment in the EIA Report concludes: The proposed development will not impact any military radar facilities, or impact on the infrastructure and operation of Stornoway Airport. No mitigation is required for these elements. A visible spectrum aviation lighting scheme has been designed to comply with statutory requirements under The ANO (2016) to assist with air safety.</p>
<p><b>Noise</b></p>	<p>Addressed in <b>Chapter 13: Noise</b> of the EIA Report.</p> <p>The assessment in the EIA Report concludes: The effect of construction and decommissioning noise, including construction traffic, is predicted to be not significant and no specific mitigation measures are considered necessary. The effect of operational noise is also predicted to be not significant and no specific mitigation measures are considered necessary.</p>
<p><b>Community Amenity</b></p>	<p>Addressed in <b>Chapter 7: Landscape and Visual Amenity, Chapter 13: Noise, Chapter 14: Socio-economics, Tourism, Recreation and Land Use, and Chapter 16: Other Issues</b> of the EIA Report.</p> <p>The assessment in <b>Chapter 7</b> of the EIA Report assesses views of the proposed development from nearby settlements (all outwith 2km). Seven settlements were assessed as having moderate (adverse) and significant visual effects for the settlements as a whole, with significant effects identified for localised extents of two additional settlements.</p> <p>The assessment in <b>Chapter 13</b> of the EIA Report concluded that the effect of construction and decommissioning noise, including construction traffic, is predicted to be not significant and no specific mitigation measures are considered necessary. Further to this, the effect of operational noise is also predicted to be not significant and no specific mitigation measures are considered necessary. The cumulative noise from the other consented or proposed wind turbines in proximity to the proposed development would not cause an increase to the operational or construction noise levels predicted through the assessment, and therefore would not lead to significant effects.</p>



Policy	Assessment Summary and Where Addressed in EIA Report
	<p>The assessment in <b>Chapter 14</b> of the EIA Report concluded that, with regard to recreation and tourism assets, no bird watching activity pertaining to the Site itself was found from desk-based research and the islands themselves have ample alternative facilities and sites for bird-watching which are already popular with visitors. No significant effects are expected due to the construction of the proposed development subject to appropriate good practice management of construction traffic effects along access roads to the Site, and within the Site through the implementation of a Construction Traffic Management Plan (CTMP). Beneficial effects (also not significant) may be experienced by some businesses, such as accommodation businesses and shops, that supply goods and services to construction workers. The impact of the proposed development on Eishken Lodge would be due to access leading to the Lodge being heavily restricted during the construction period. However, the landowner is directly involved with the proposed development, benefiting from its construction, coupled with the construction being a temporary impact, resulting in no significant effects.</p> <p>The shadow flicker assessment in <b>Chapter 16</b> of the EIA Report concluded that some of the properties assessed could potentially experience over 30 hours of shadow flicker per annum (all of these properties are financially involved in the project). Based on the assessment criteria, the effects on these properties would be significant without mitigation. It is however more likely in practice that actual hours of shadow flicker would be considerably less than this due to the wind not always blowing and the sun not always shining at the assessed locations. Given adjustments for likely sunshine hours, annual hours of shadow flicker anticipated at all properties is calculated significantly under 30 hours.</p> <p>The applicant is committed to promptly investigating any complaints of shadow flicker and taking appropriate action as required. This would comprise an investigation which considers the weather conditions at the time of the alleged shadow flicker, to determine which turbines were, or were not, creating the effect and the extent of the shadow flicker created. If the investigation confirms a loss of residential amenity at any location, the technical mitigation measures built into relevant turbines would be activated. The shadow flicker control module consists of bespoke software, a clock, a timer, a switch, a wind direction sensor and a light sensor. The module can control a specific turbine (or turbines) which would be programmed to shut down on specific dates at specific times when the sun is bright enough, there is sufficient wind to rotate the blades and the wind direction is such that nuisance shadow flicker could occur. Following implementation of this mitigation, no significant effects would result for shadow flicker.</p>

Policy	Assessment Summary and Where Addressed in EIA Report
<b>Neighbouring Developments</b>	<p>Addressed in <b>Chapter 5: Environmental Impact Assessment</b> and <b>Chapter 7: Landscape and Visual Amenity</b> of the EIA Report.</p> <p>A list of cumulative developments is provided in paragraph 5.41 in <b>Chapter 5: Environmental Impact Assessment</b> of the EIA Report. No significant cumulative effects have been identified arising from the proposed development along with other operational, consented and submitted developments.</p>
<b>Historic Resources</b>	<p>Addressed in <b>Chapter 11: Cultural Heritage and Archaeology</b> of the EIA Report.</p> <p>The assessment in the EIA Report concludes: The proposed development would result in a Minor adverse significance of effect for the Calanais Complex, with all other assets assessed as experiencing no or negligible effect. The EIA Report concludes that there are no significant effects on cultural heritage assets from the proposed development that would be significant in EIA terms.</p>
<b>Natural Heritage</b>	<p>Addressed in <b>Chapter 8: Ecology</b> of the EIA Report.</p> <p>The assessment in the EIA Report concluded that following the implementation of mitigation measures during construction and also restoration proposals to be implemented via a HMP, there would be no significant effects on Ecology.</p>
<b>Peat and Soil Resources</b>	<p>Addressed in <b>Chapter 10: Hydrology, Hydrogeology and Geology</b> of the EIA Report.</p> <p>The assessment in the EIA Report concludes with the following: a programme of peat probing has been completed and this has been used to inform the Site design. The proposed turbines have been located in areas of shallow peat, avoiding siting any turbines on peat depth greater than 1m. A hazard impact assessment concluded that, subject to the employment of appropriate mitigation measures, the presence of peat and potential peat slide instability are not development constraints. The proposed development has subsequently undergone design iterations and evolution in response to the geological, hydrological and hydrogeological constraints identified as part of the baseline studies and field studies so to avoid and/or minimise likely effects on receptors where possible. This has included areas of deep peat or potential peat instability.</p>
<b>Water Resources</b>	<p>Addressed in <b>Chapter 10: Hydrology, Hydrogeology and Geology</b> of the EIA Report.</p> <p>The assessment in the EIA Report concludes: An assessment of the potential effects of the proposed development on soils, geology, hydrology, hydrogeology within a defined study area (comprising land within 1km of the Site boundary) has been undertaken and no significant impacts in terms of the EIA Regulations have been identified.</p>

Policy	Assessment Summary and Where Addressed in EIA Report
<p><b>Borrow Pits</b></p>	<p>Addressed in <b>Technical Appendix 10.3: Borrow Pit Appraisal</b> of the EIA Report.</p> <p>Five borrow pits have been assessed as being capable of supplying all the aggregate required for the Site, excluding the concrete for the turbine bases and a surface road dressing. The locations and methods of working would be managed to cause minimal impact to the ground conditions and water environment.</p> <p>Prior to the construction of the proposed development, design and best practices, and any required mitigation measures, would be set out in full within a Construction Environmental Management Plan (CEMP) and agreed with the statutory bodies.</p>
<p><b>Repowering</b></p>	<p>As detailed in <b>Chapter 2: Site Description and Design Evolution</b> of the EIA Report, the Site where the proposed development is located currently has consent for 45 wind turbines across three consents (Muaitheabhal Wind Farm (ECU ref. EC00005222), Muaitheabhal Wind Farm Southern Extension (ECU ref. EC00002096) and Muaitheabhal Wind Farm Eastern Extension (ECU ref. EC00005223)). These consents have been implemented and as such are in a position to commence construction work, however the proposed development is considered an improvement on the consented scheme(s) as a result of generating a greater MW output from a smaller footprint and fewer turbines, by utilising larger and more modern turbines.</p>
<p><b>Planning Obligations</b></p>	<p>It is understood by the applicant that wind farm developments will be subject to a requirement for the completion of an agreement under section 75 of the Town and Country Planning (Scotland) Act 1997, covering such things as land restoration, off site road works, and safeguarding / remediation works.</p>
<p><b>Decommissioning</b></p>	<p>Decommissioning phase detail is provided in <b>Chapter 3: Description of Development</b> of the EIA Report.</p>
<p><b>Cumulative Impacts</b></p>	<p>Addressed in <b>Chapter 5: Environmental Impact Assessment</b> of the EIA Report, as well as technical <b>Chapters 7 to 16</b> of the EIA Report.</p> <p>A list of cumulative developments is provided in paragraph 5.41 in <b>Chapter 5: Environmental Impact Assessment</b> of the EIA Report. No significant cumulative effects have been identified arising from the proposed development along with other operational, consented and submitted developments.</p>

Policy	Assessment Summary and Where Addressed in EIA Report
<b>Radar Impact</b>	Addressed in <b>Chapter 15: Aviation</b> of the EIA Report.  The assessment in the EIA Report concludes that: The proposed development will not impact any military radar facilities, or impact on the infrastructure and operation of Stornoway Airport. No mitigation is required for these elements. A visible spectrum aviation lighting scheme has been designed to comply with statutory requirements under The Air Navigation Order (2016) to assist with air safety.

## 6.4 Planning Policy Conclusions

140. The proposed development, due to its size and location, would have National Development status, as outlined in NPF4. **Section 6.2.4** along with **Table 6-1** and **Table 6-2** set out that the proposed development is in accordance with NPF4 Policy 11 'Energy', as well as other relevant policies within NPF4.
141. **Table 6-3** sets out that the proposed development is in accordance with the policies of the Supplementary Guidance for Wind Energy Development Policies, and as a result, in accordance with Policy EI8: Energy and Heat Resources of the OHLDP. The proposed development is also considered to be in accordance with the other relevant OHLDP policies detailed in paragraph 134.

## 7.0 Overall Conclusions

### 7.1 Electricity Act 1989

142. As the proposed development will have an installed capacity of greater than 50MW, the application for consent and deemed planning permission is made to Scottish Ministers under section 36 of the Electricity Act 1989.
143. Paragraph 3(2) of Schedule 9 to the Electricity Act 1989 Act provides a specific statutory requirement on the Scottish Ministers to have regard to various matters when considering development proposals. The information that is contained within the EIA Report that accompanies this application addresses these. It is considered that the EIA Report confirms that the proposed development is environmentally acceptable. On this basis Uisenis Power Limited has fulfilled its obligations under Schedule 9 of the Electricity Act 1989 in this regard.

### 7.2 Climate Change and Renewable Energy

144. There has been a strong commitment in recent times from government across the world towards reducing the risks and impacts of climate change. However, a rapidly changing climate has driven many governments to formally declare a 'climate emergency', the UK and Scottish Governments both declaring such climate emergencies in 2019.
145. In response to the declared climate emergency, there has been a step change in policy and attitudes towards the importance of reducing greenhouse gas emissions to combat climate change as soon as possible. This has seen the Scottish Government adopting even more ambitious climate change and renewable and targets than it had previously set, in particular setting statutory targets through the Climate Change (Emissions Reductions Targets) (Scotland) 2019 which now commit Scotland to a new target of net zero emissions of all greenhouse gases by 2045 and a series of interim and annual targets towards this. The evidence clearly shows the scale of the challenge required to meet these targets. The importance of very substantial increases in renewable energy generation to reduce greenhouse gas emissions has therefore been emphatically acknowledged, with the UK Committee on Climate Change identifying that renewable energy generation "must quadruple" if net zero targets are to be met. With the onshore wind sector likely to play the greatest role in achieving this substantial increase in renewable energy generation in the next decade, the Scottish Government's Onshore Wind Policy Statement 2022 has quantified this as requiring 20GW of onshore wind generation by 2030, a target enshrined through the Bute House Agreement.
146. Renewable energy generation, including domestic onshore wind, also has an important part to play in the UK Government aims to reduce rapidly increasing energy bills and increase energy security, by enabling a reduction in the dependence on imported oil and gas. This is detailed within the British Government's 'British Energy Security Strategy' (2022).
147. It is therefore concluded that the need case for the new renewable generation, and in particular onshore wind, has been materially strengthened by this new net zero legislation. That being the case, the contribution the proposed development would make to these targets by replacing fossil fuel energy generation and thereby reducing greenhouse gas emissions is a factor in its favour to which substantial weight should be attached in the determination of this application.

## 7.3 National Planning Policy & Guidance

148. With regard to planning policy, NPF4 represents a fundamental shift in response to climate change. This has significantly strengthened the planning policy support for renewable energy developments by virtue of a weight of significance that must now be applied to the climate and nature crises when considering development proposals.
149. Policies 1 and 11 of NPF4 provide a supportive and unambiguous basis for decision makers assessing this planning application. This means that significant weight must be attached to the contribution of the proposed development to meeting renewable energy generation and greenhouse gas emissions reductions targets.
150. Policy 11 of NPF4 clearly sets out support for onshore wind development and the proposed development is considered to accord with this Policy Outcome which is the *“expansion of renewable, low-carbon and zero emissions technologies.”*. It is also important to note that there is a recognition in this policy of the potential for significant landscape and visual effects arising from certain types of renewable energy development. It is accepted that a development of a commercial wind farm of this nature will inevitably give rise to landscape and visual effects.
151. It is considered that the proposed development can draw strong policy support from NPF4 for the role it can play in tackling the twin crises of climate emergency and nature crises.

## 7.4 Development Plan

152. The Outer Hebrides Local Development Plan and its associated Supplementary Guidance for Wind Energy Development can be considered generally supportive of renewable energy development, including onshore wind. This is made clear in the Supplementary Guidance which states the desire for the Outer Hebrides to be at the forefront of the transition to low carbon energy and siting commitments to creating a ‘net zero emission island’ and ‘unleash the potential of renewable energy’.
153. The proposed development is in accordance with the policies of the Supplementary Guidance for Wind Energy Development Policies, and as a result, in accordance with Policy EI8: Energy and Heat Resources of the OHLDP.

## 7.5 Proposed Development v Consented Scheme(s)

154. The Site where the proposed development is located currently has consent for 45 wind turbines across three consents (Muaitheabhal Wind Farm (ECU ref. EC00005222), Muaitheabhal Wind Farm Southern Extension (ECU ref. EC00002096) and Muaitheabhal Wind Farm Eastern Extension (ECU ref. EC00005223)). Eurowind Energy Limited have implemented these consents and as such are in a position to commence construction work. However, the applicant is of the belief that the proposed Uisenis Wind Farm is, overall, an improved and enhanced scheme (see **Project Comparison Report** for more detail), utilising larger wind turbines in order to provide approximately 3MW more generating capacity with a total net reduction in infrastructure required, and reduced embedded carbon. The smaller number of turbines that make up the proposed development have allowed more flexibility with the design and layout of proposed infrastructure. In addition to this, fewer turbines have led to a reduction in the amount of new access track required, and a reduction in the amount of peat that would be disturbed.
155. The community benefit on offer as part of the proposed development is considerably larger than that of the consented Muaitheabhal Wind Farm scheme(s). The proposed development would contribute



£24,750,000 to local communities over the lifetime of the wind farm, compared to £5,062,500 that would be contributed over the lifetime of the consented Muaitheabhal Wind Farm scheme(s).

## 7.6 Final Conclusion

156. The UK and Scottish Government objective is clear in terms of the urgency of the need case for carbon reduction measures, including the requirement for the rapid development of renewable energy. Large schemes (> 50MW) such as the proposed development, which utilise efficient turbines, are located on sites that benefit from high wind speeds, and that have a short carbon payback period, can make significant contributions towards this objective.
157. Given this strong need case, it must surely be demonstrated in terms of the planning balance exercise that if proposals for such schemes are not to be granted consent that they must either be located on unsuitable sites and/or that their adverse environmental impacts must be out of the ordinary or exceptional. As demonstrated throughout this Planning Statement, this is clearly not the case with this proposal.
158. Overall, it is therefore submitted that the proposed development is in accordance with the provisions of the Electricity Act 1989, NPF4 and the other elements of the Development Plan (Local Development Plan and Supplementary Guidance), and that there are no other material considerations that indicate that consent should not be granted. It is considered that any significant effects of the proposed development that have been identified in the EIA Report do not outweigh its positive climate change, renewable energy and socio-economic benefits. On this basis, it is concluded that Section 36 consent and deemed planning permission should be granted for the proposed development.

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## FIGURES



120000

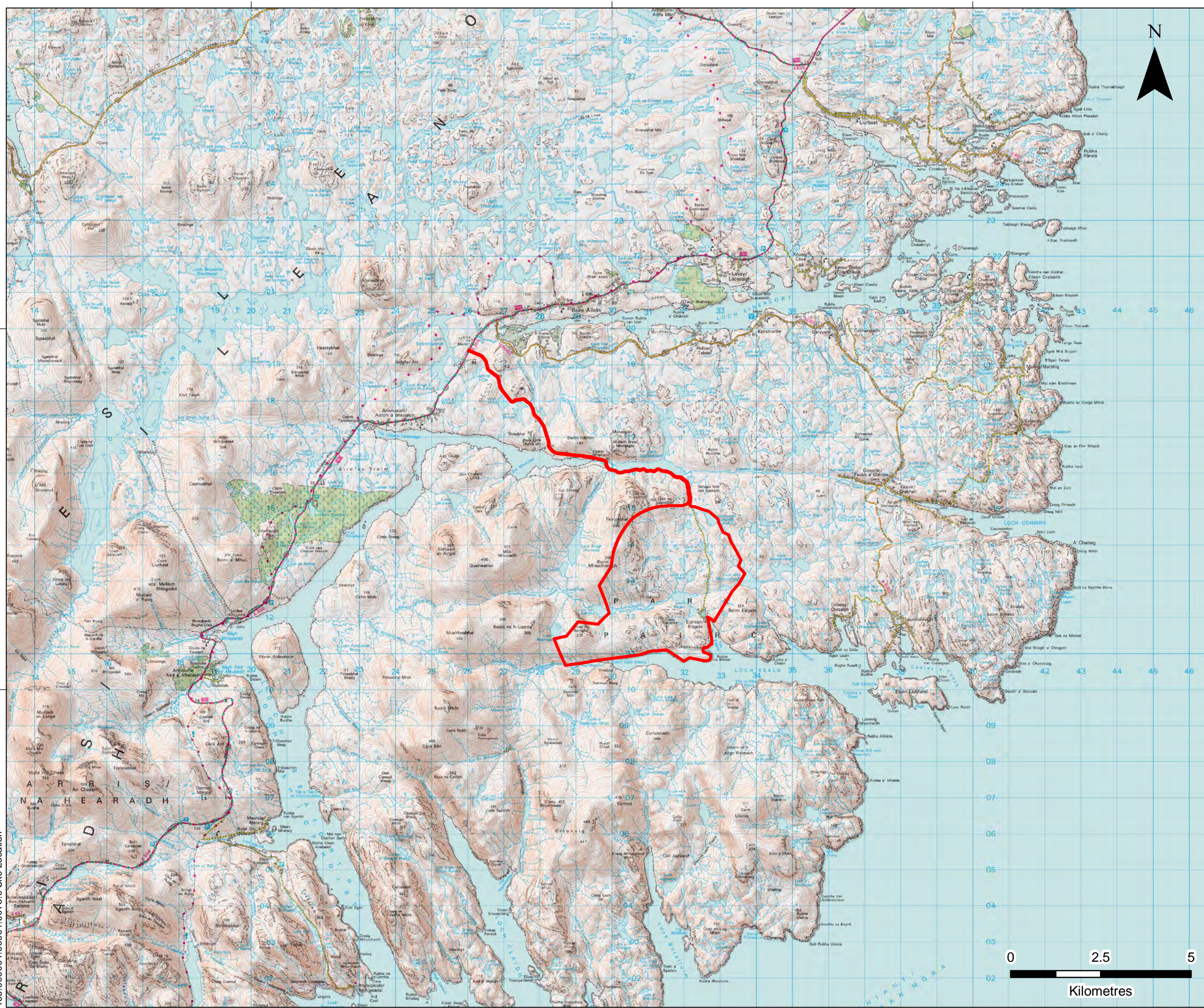
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406.00004.00001.0078.0 Site Location



**LEGEND**

Application Boundary



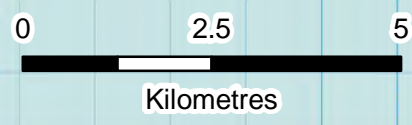
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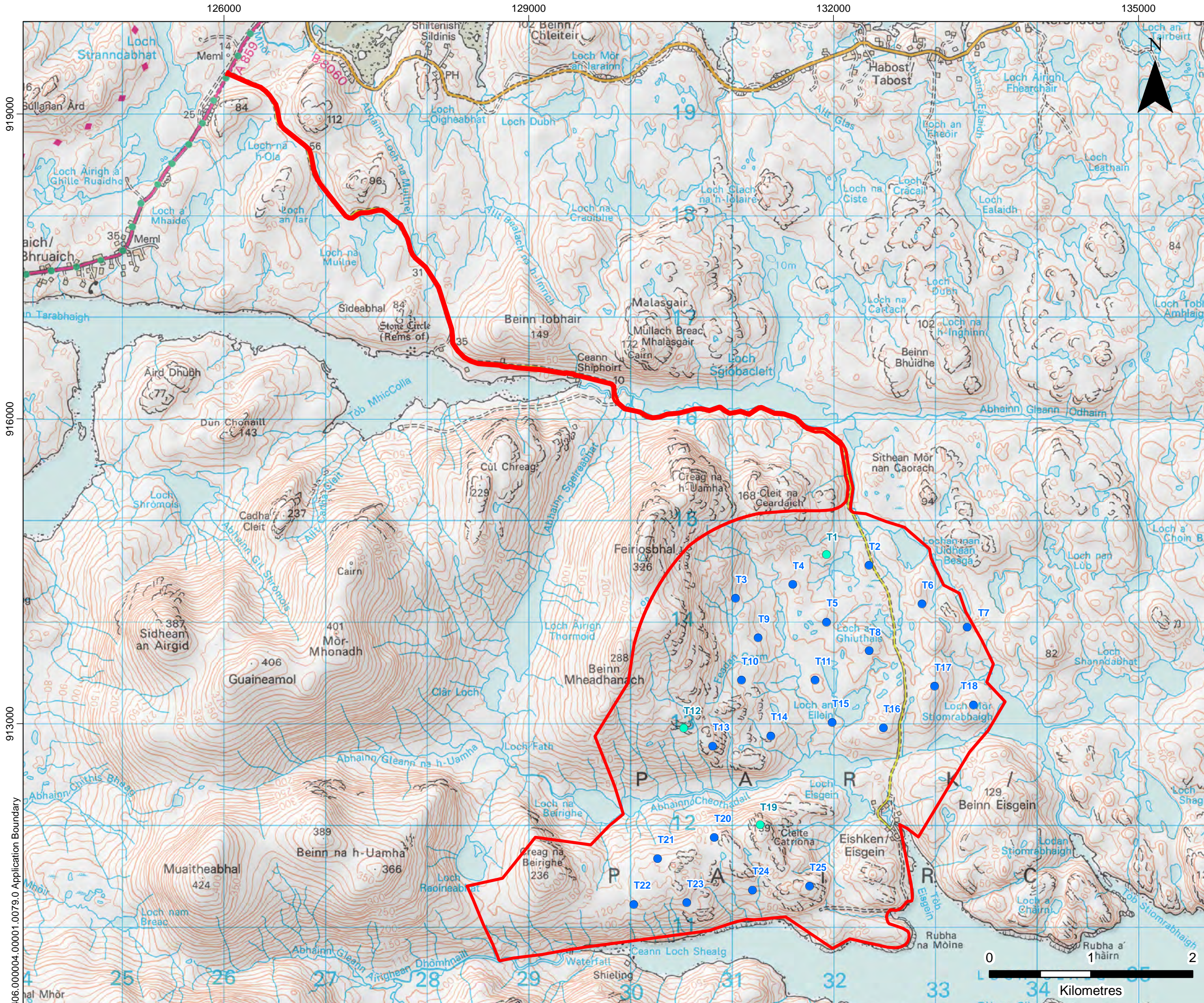
**UISENIS WIND FARM - EIA**  
**PLANNING STATEMENT**  
**SITE LOCATION**

**FIGURE 1**



Scale 1:100,000 @ A3 Date AUGUST 2023





**LEGEND**

- Application Boundary
- Proposed Turbine Location (180 m Blade Tip Height)
- Proposed Turbine Location (200 m Blade Tip Height)



**Eurowind Energy**

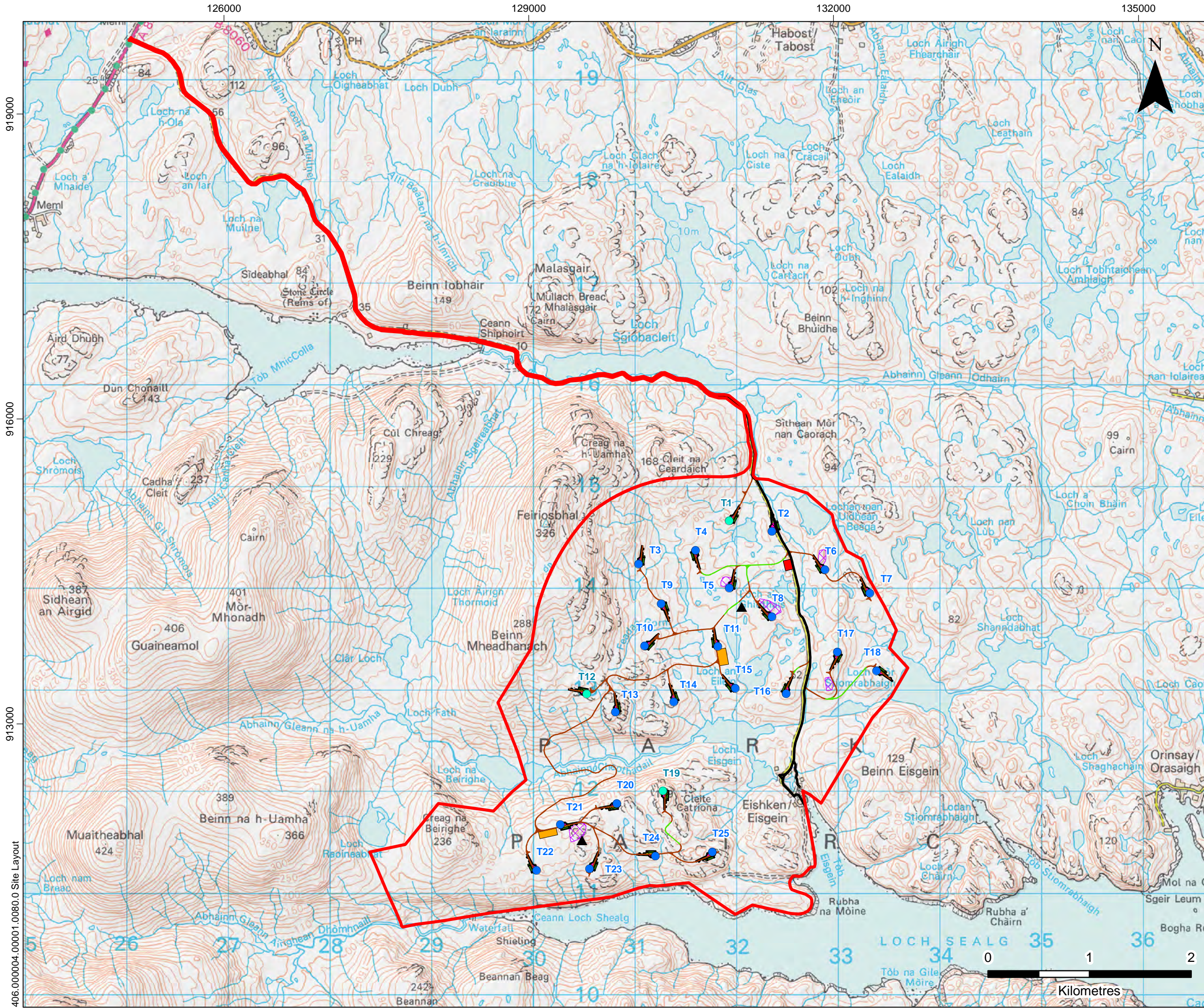
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**UISENIS WIND FARM - EIA  
PLANNING STATEMENT  
APPLICATION BOUNDARY**

**FIGURE 2**

Scale 1:35,000 @ A3 Date AUGUST 2023





**LEGEND**

- Application Boundary
- Proposed Turbine Location (180 m Blade Tip Height)
- Proposed Turbine Location (200 m Blade Tip Height)
- ▲ Proposed Permanent Met Mast
- Proposed Bespoke Hardstanding Envelope
- Proposed Permanent Substation
- Proposed Permanent Hardstanding
- Proposed Temporary Hardstanding
- Proposed Temporary Bridge Alignment
- Proposed Temporary Construction Compound
- Proposed Clearance Area
- Potential Borrow Pit
- Proposed Access Track / Turning Head
- Proposed Floating Access Track
- Existing Road (To Be Upgraded)



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UISENIS WIND FARM - EIA  
PLANNING STATEMENT  
SITE LAYOUT

**FIGURE 3a**

Scale 1:35,000 @ A3      Date AUGUST 2023



125600

126000

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406.000004.00001.0080.0 Site Layout

# Cnoc Mór nan Annscothan

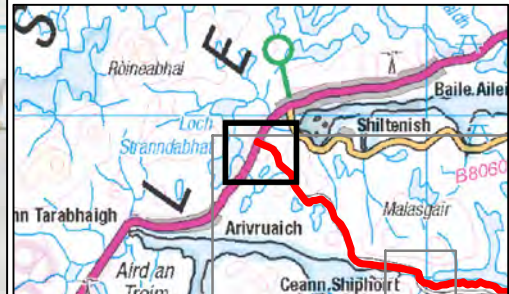
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### Loch na h-Ola

### Allt Goidamol



- LEGEND**
- Application
  - Existing Road (To Be Upgraded)



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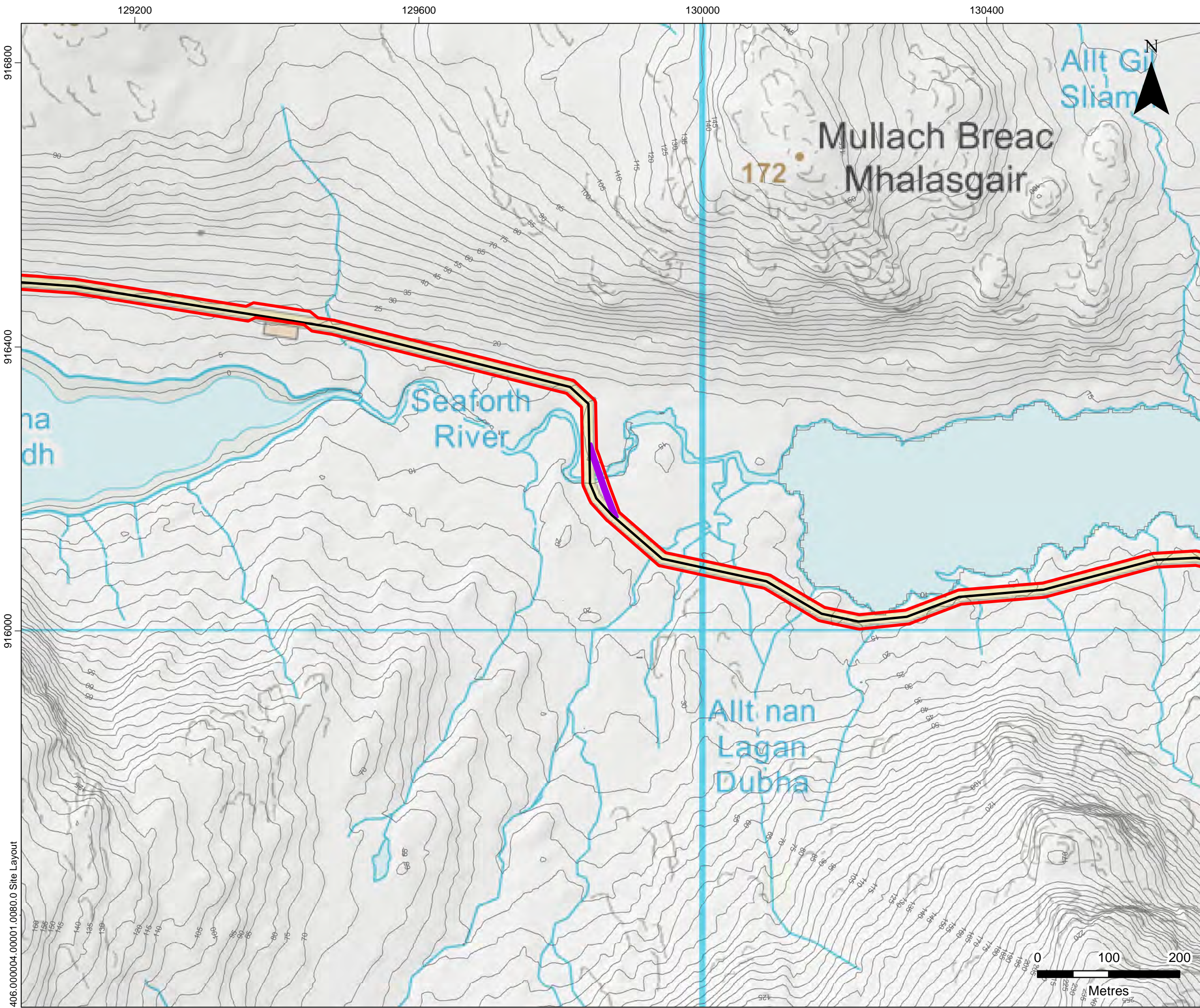
SITE LAYOUT

**FIGURE 3b**



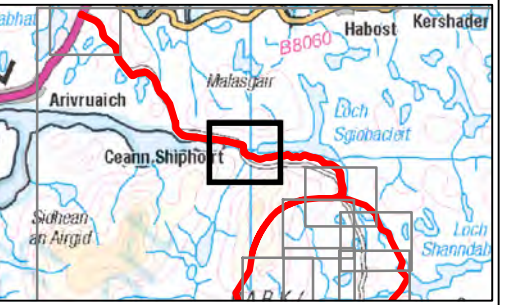
Scale 1:5,000 @ A3 Date AUGUST 2023





**LEGEND**

- Application Boundary
- Proposed Temporary Bridge Alignment
- Existing Road (To Be Upgraded)



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UISENIS WIND FARM - EIA  
PLANNING STATEMENT  
SITE LAYOUT

**FIGURE 3c**

Scale 1:5,000 @ A3      Date AUGUST 2023



131600

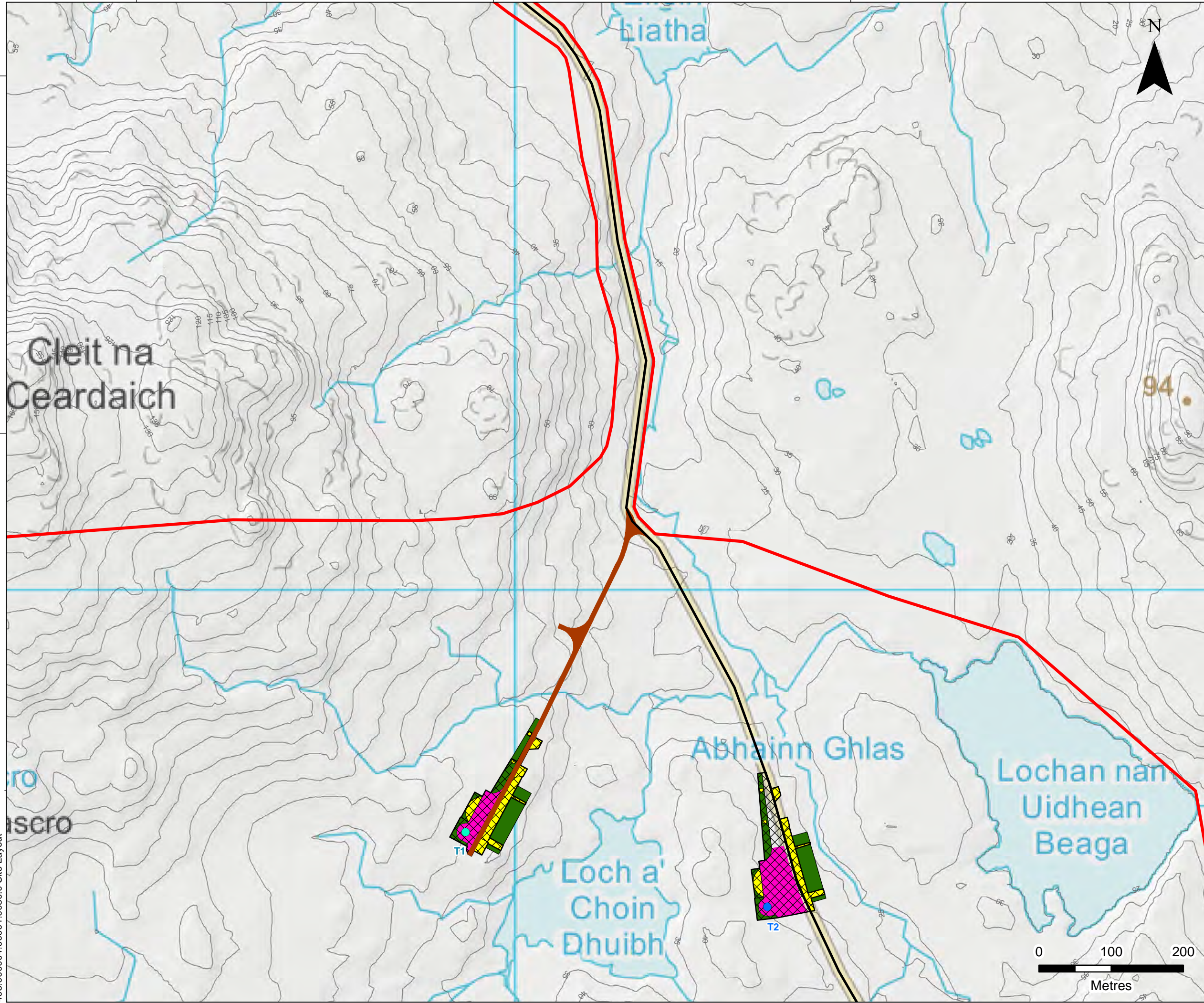
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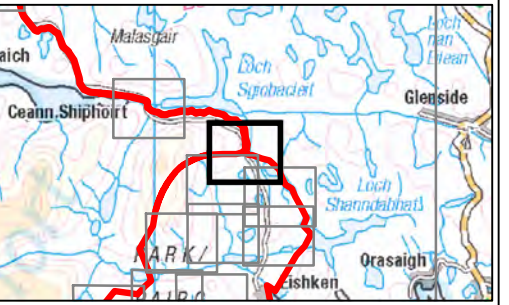
915200

406.00004.00001.0080.0 Site Layout



**LEGEND**

- Application Boundary
- Proposed Turbine Location (180 m Blade Tip Height)
- Proposed Turbine Location (200 m Blade Tip Height)
- Proposed Bespoke Hardstanding Envelope
- Proposed Permanent Hardstanding
- Proposed Temporary Hardstanding
- Proposed Clearance Area
- Proposed Access Track / Turning Head
- Existing Road (To Be Upgraded)



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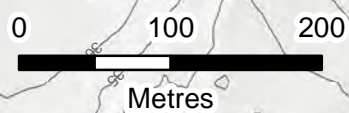
UISENIS WIND FARM - EIA  
PLANNING STATEMENT  
SITE LAYOUT

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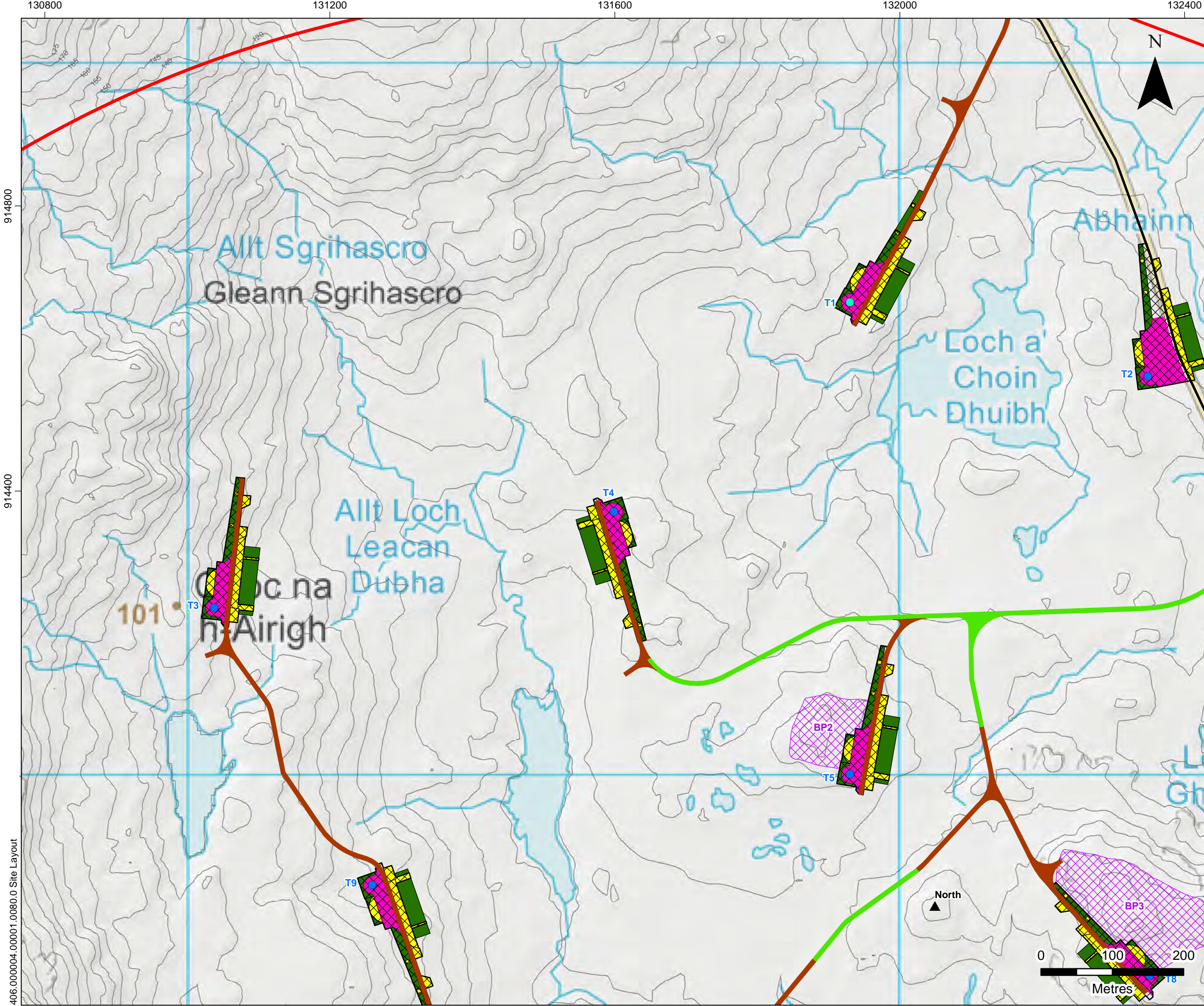
**FIGURE 3d**

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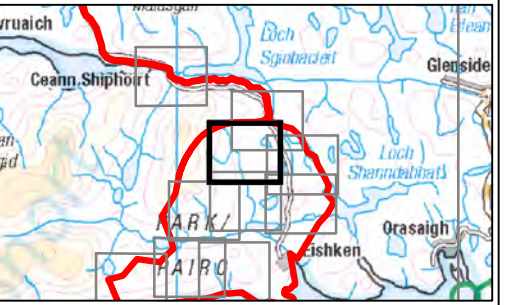






**LEGEND**

- Application Boundary
- Proposed Turbine Location (180 m Blade Tip Height)
- Proposed Turbine Location (200 m Blade Tip Height)
- ▲ Proposed Permanent Met Mast
- Proposed Bespoke Hardstanding Envelope
- Proposed Permanent Hardstanding
- Proposed Temporary Hardstanding
- Proposed Clearance Area
- Potential Borrow Pit
- Proposed Access Track / Turning Head
- Proposed Floating Access Track
- Existing Road (To Be Upgraded)



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UISENIS WIND FARM - EIA  
PLANNING STATEMENT  
SITE LAYOUT

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**FIGURE 3e**

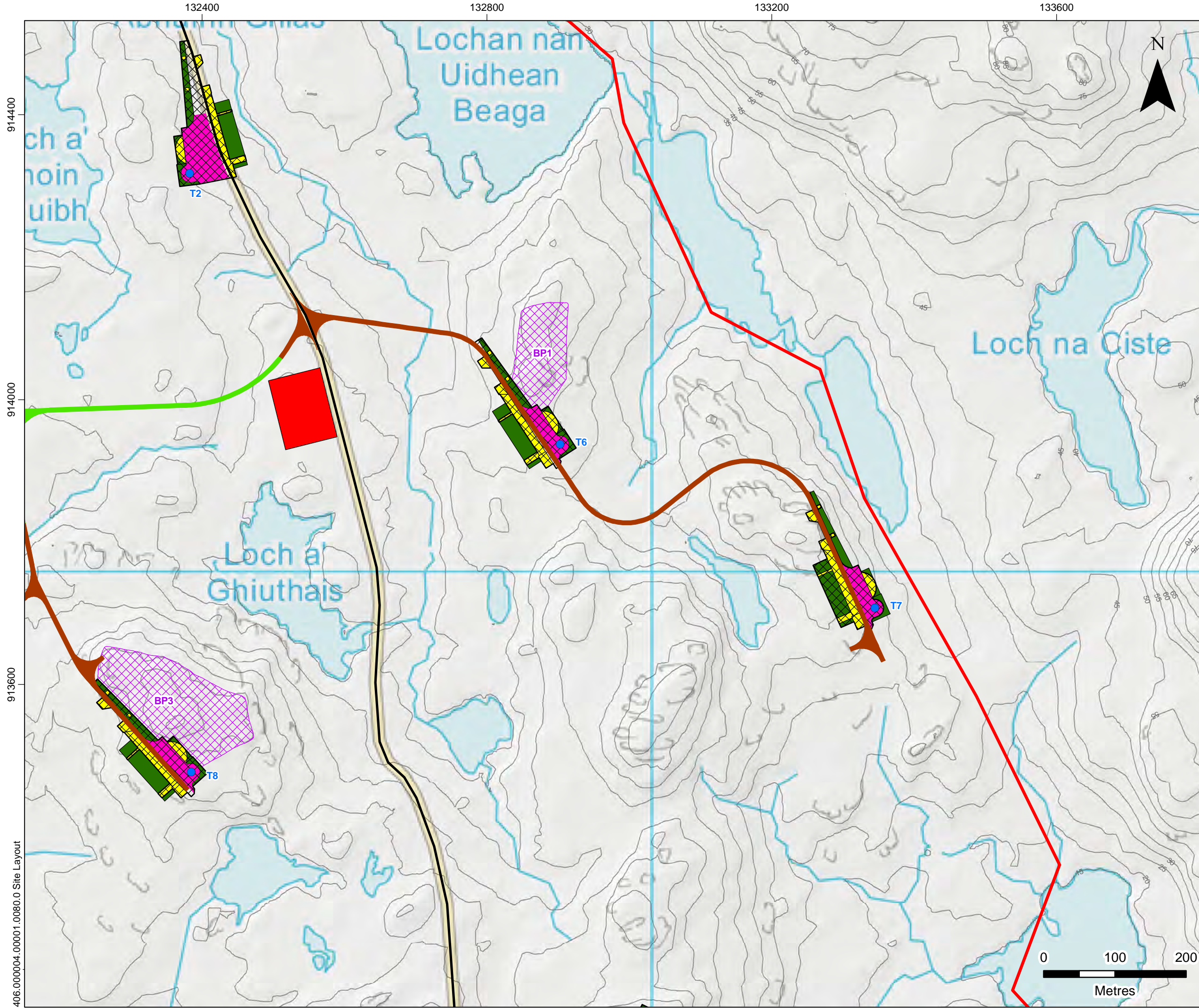
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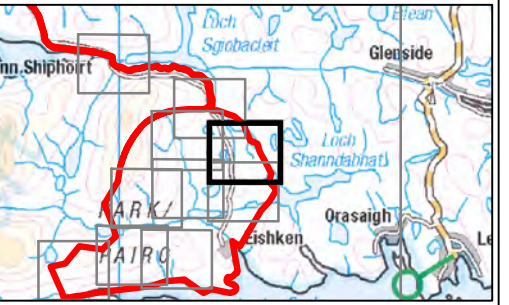
Date AUGUST 2023

406.000004.00001.0080.0 Site Layout





- LEGEND**
- Application Boundary
  - Proposed Turbine Location (200 m Blade Tip Height)
  - Proposed Bespoke Hardstanding Envelope
  - Proposed Permanent Substation
  - Proposed Permanent Hardstanding
  - Proposed Temporary Hardstanding
  - Proposed Clearance Area
  - Potential Borrow Pit
  - Proposed Access Track / Turning Head
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  - Existing Road (To Be Upgraded)



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UISENIS WIND FARM - EIA

PLANNING STATEMENT

SITE LAYOUT

**FIGURE 3f**



Scale 1:5,000 @ A3 Date AUGUST 2023

406.00004.00001.0080.0 Site Layout



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131200

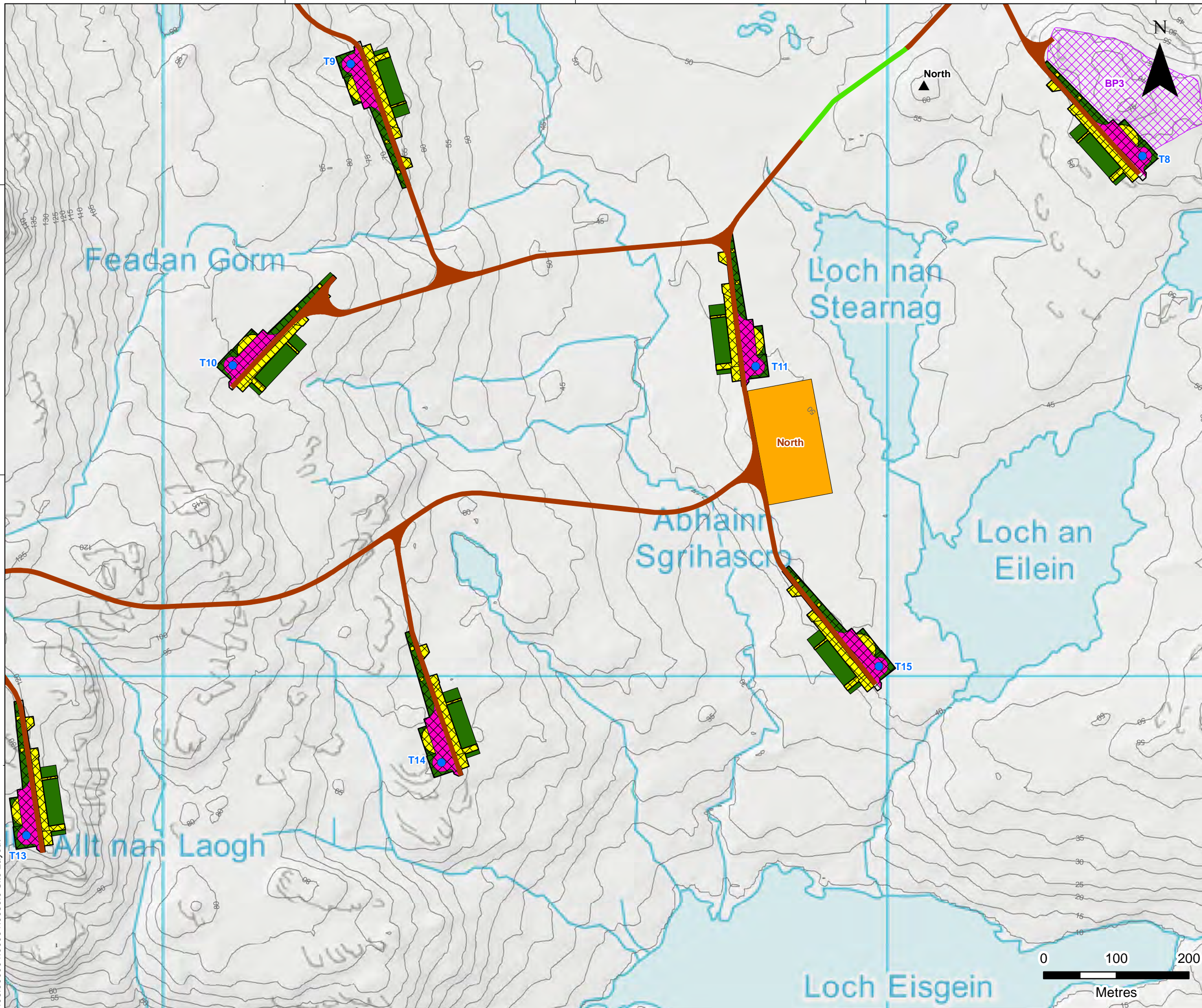
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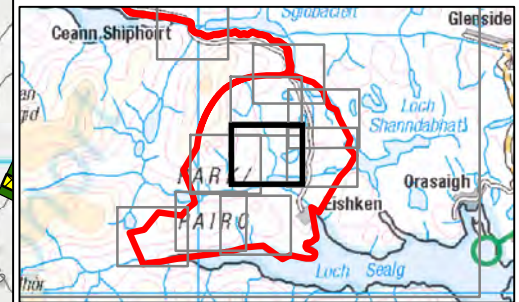
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406.000004.00001.0080.0 Site Layout



**LEGEND**

- Application Boundary
- Proposed Turbine Location (200 m Blade Tip Height)
- ▲ Proposed Permanent Met Mast
- Proposed Bespoke Hardstanding Envelope
- Proposed Permanent Hardstanding
- Proposed Temporary Hardstanding
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PLANNING STATEMENT

SITE LAYOUT

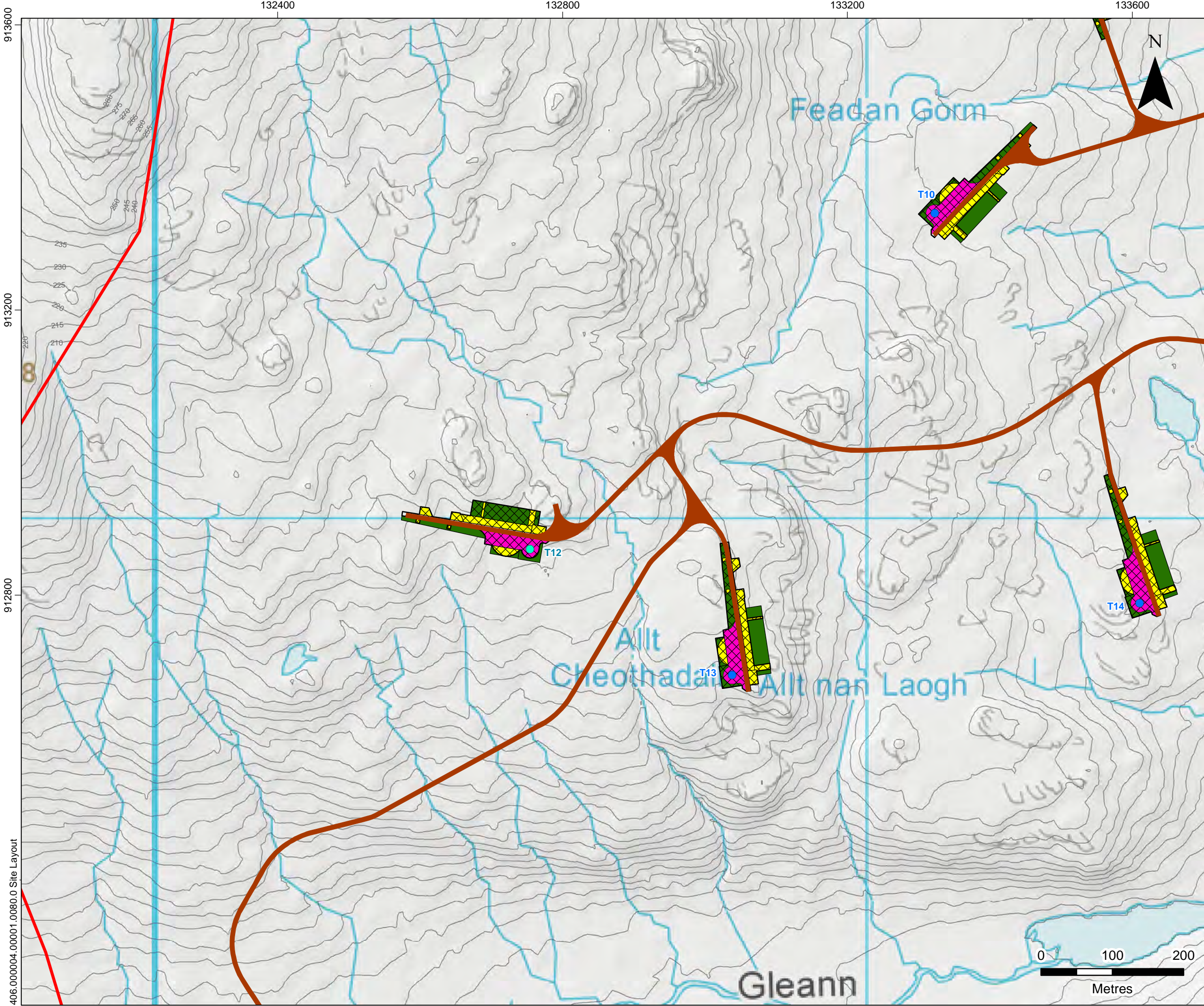
**FIGURE 3g**



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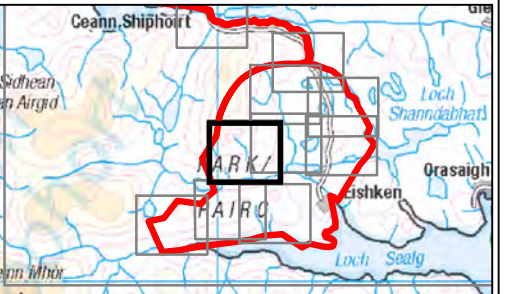
Date AUGUST 2023





**LEGEND**

- Application Boundary
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- Proposed Bespoke Hardstanding Envelope
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- Proposed Access Track / Turning Head



**Eurowind Energy.**

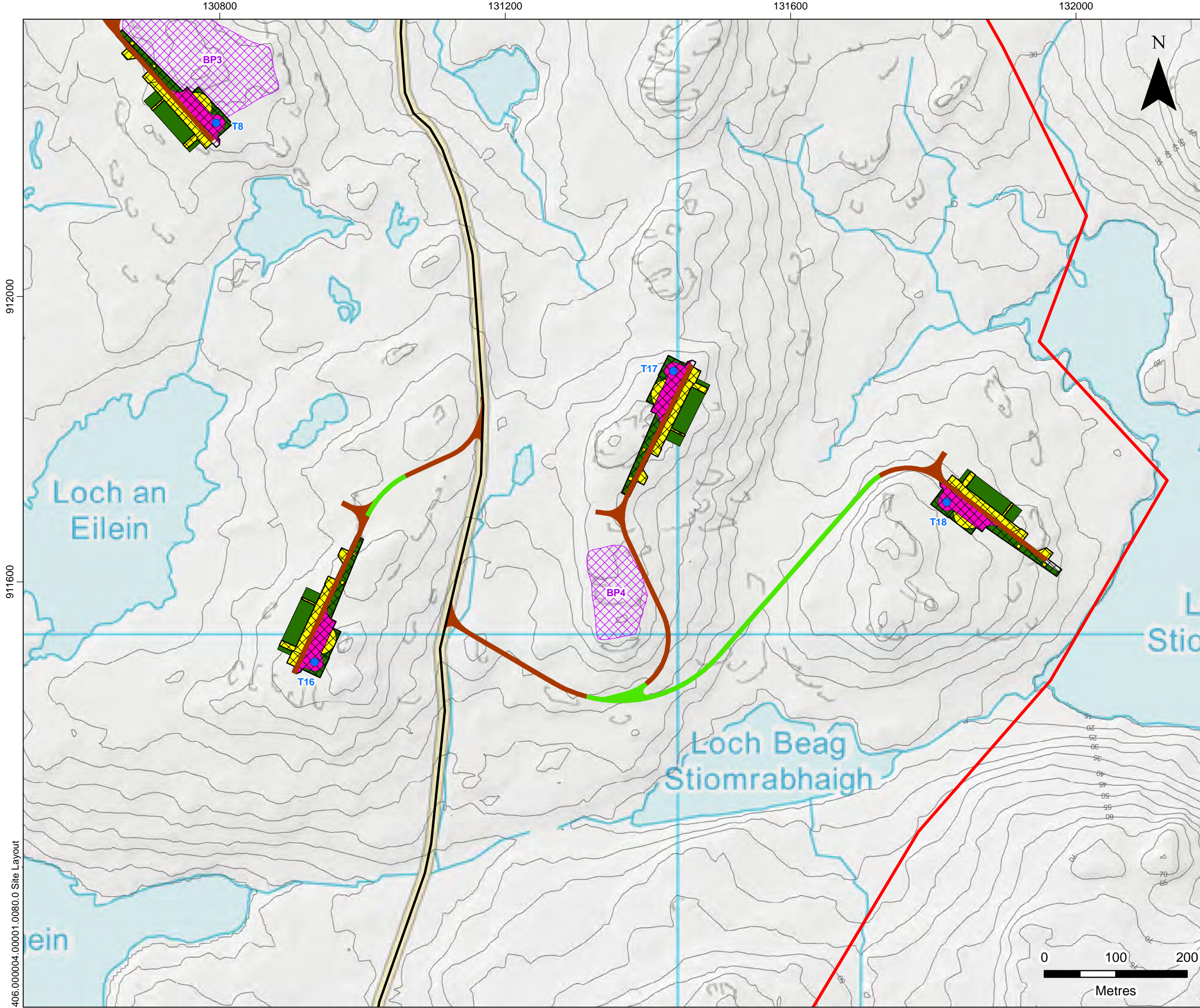
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PLANNING STATEMENT  
SITE LAYOUT  
**FIGURE 3h**

Scale 1:5,000 @ A3      Date AUGUST 2023





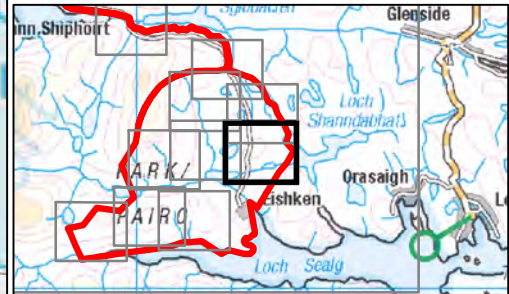
- LEGEND**
- Application Boundary
  - Proposed Turbine Location (200 m Blade Tip Height)
  - Proposed Bespoke Hardstanding Envelope
  - Proposed Permanent Hardstanding
  - Proposed Temporary Hardstanding
  - Proposed Clearance Area
  - Potential Borrow Pit
  - Proposed Access Track / Turning Head
  - Proposed Floating Access Track
  - Existing Road (To Be Upgraded)



912000

911600

406.000004.00001.0080.0 Site Layout



**Eurowind Energy**



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UISENIS WIND FARM - EIA

PLANNING STATEMENT

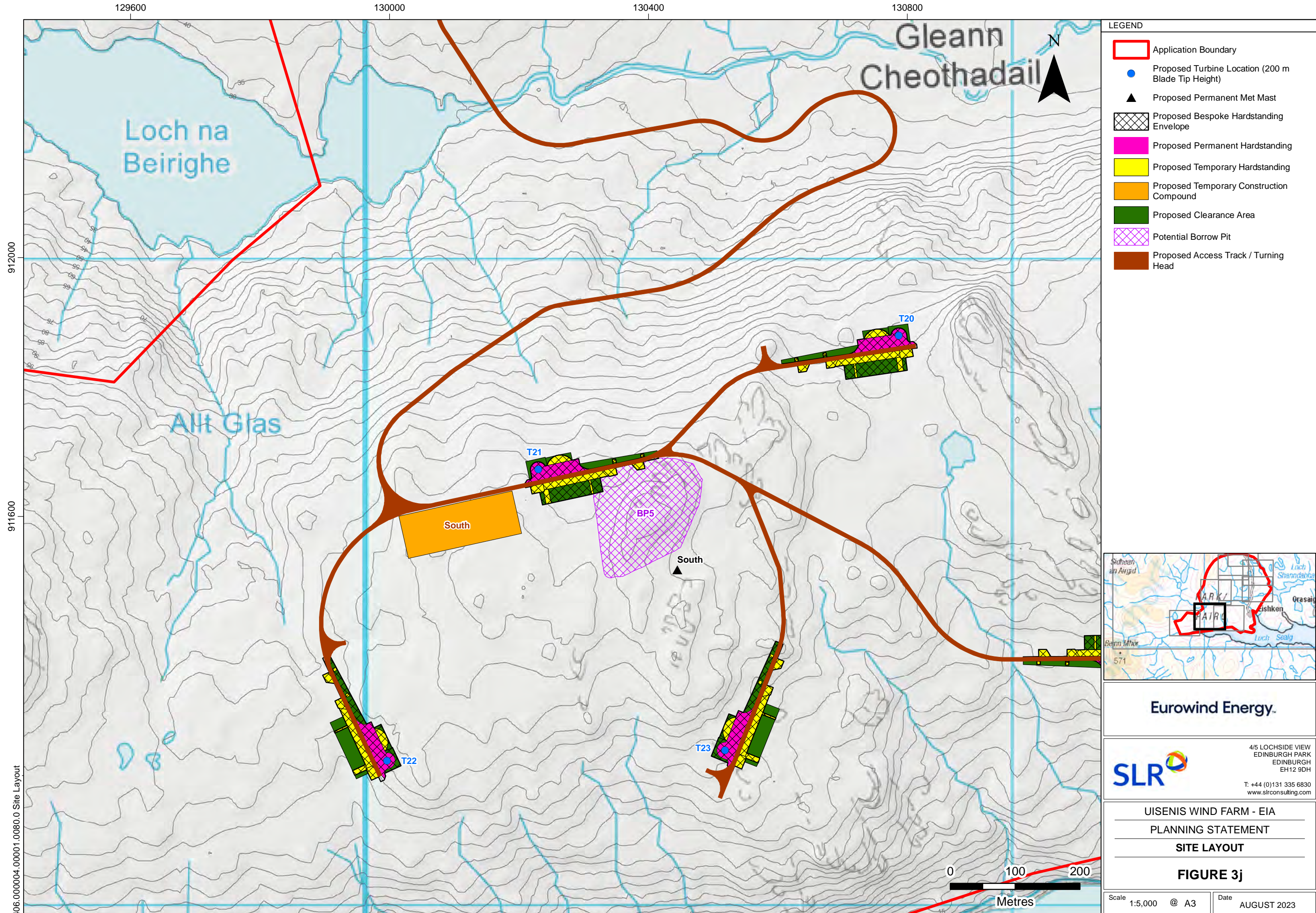
SITE LAYOUT

**FIGURE 3i**

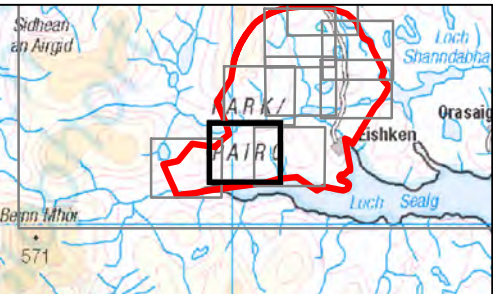


Scale 1:5,000 @ A3 Date AUGUST 2023





- LEGEND**
- Application Boundary
  - Proposed Turbine Location (200 m Blade Tip Height)
  - ▲ Proposed Permanent Met Mast
  - Proposed Bespoke Hardstanding Envelope
  - Proposed Permanent Hardstanding
  - Proposed Temporary Hardstanding
  - Proposed Temporary Construction Compound
  - Proposed Clearance Area
  - Potential Borrow Pit
  - Proposed Access Track / Turning Head



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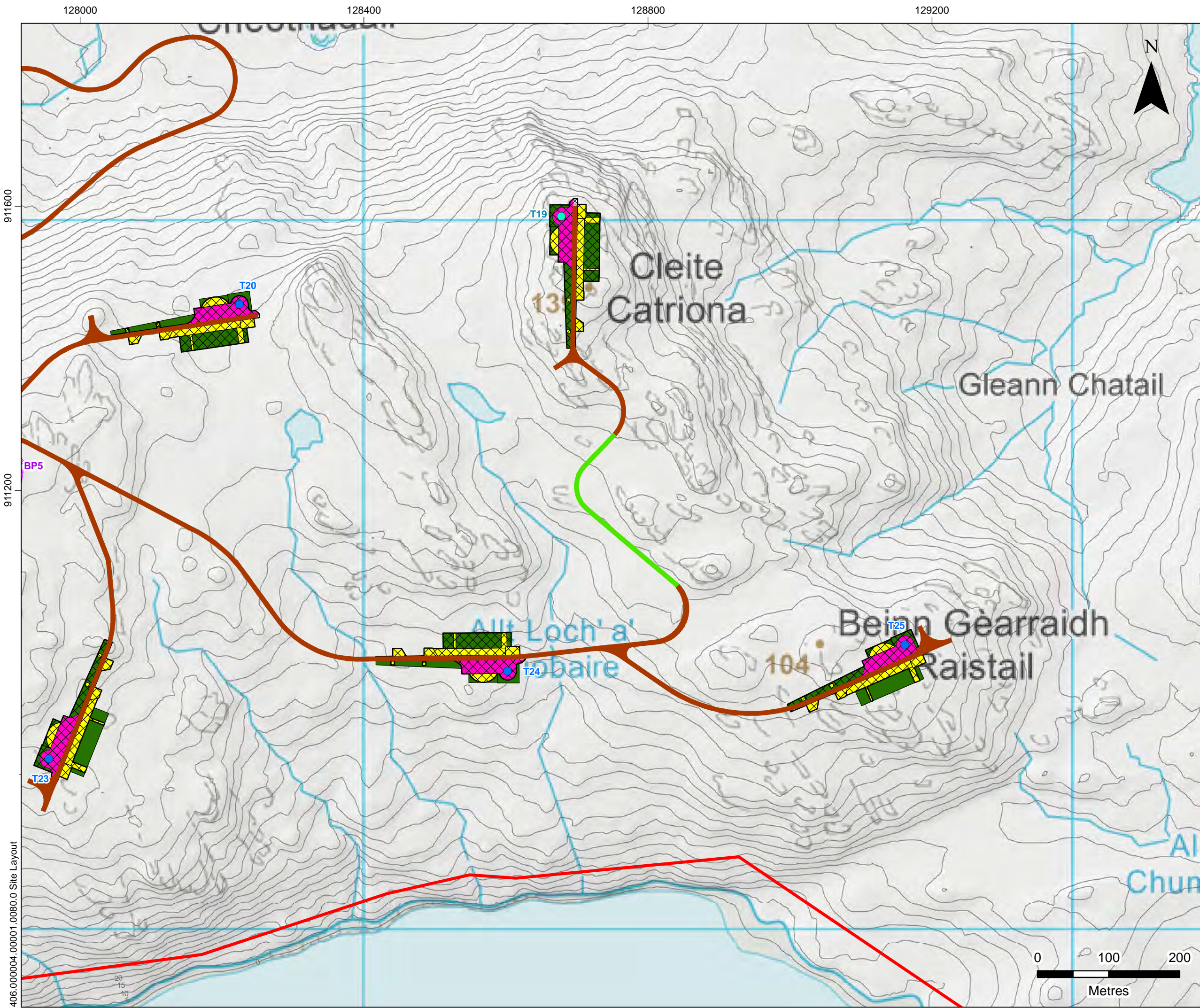
**SLR**

UISENIS WIND FARM - EIA  
PLANNING STATEMENT  
SITE LAYOUT  
**FIGURE 3j**

Scale 1:5,000 @ A3      Date AUGUST 2023

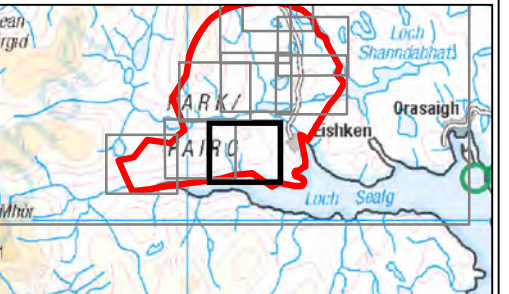
406.00004.00001.0080.0 Site Layout





**LEGEND**

- Application Boundary
- Proposed Turbine Location (180 m Blade Tip Height)
- Proposed Turbine Location (200 m Blade Tip Height)
- Proposed Bespoke Hardstanding Envelope
- Proposed Permanent Hardstanding
- Proposed Temporary Hardstanding
- Proposed Clearance Area
- Potential Borrow Pit
- Proposed Access Track / Turning Head
- Proposed Floating Access Track



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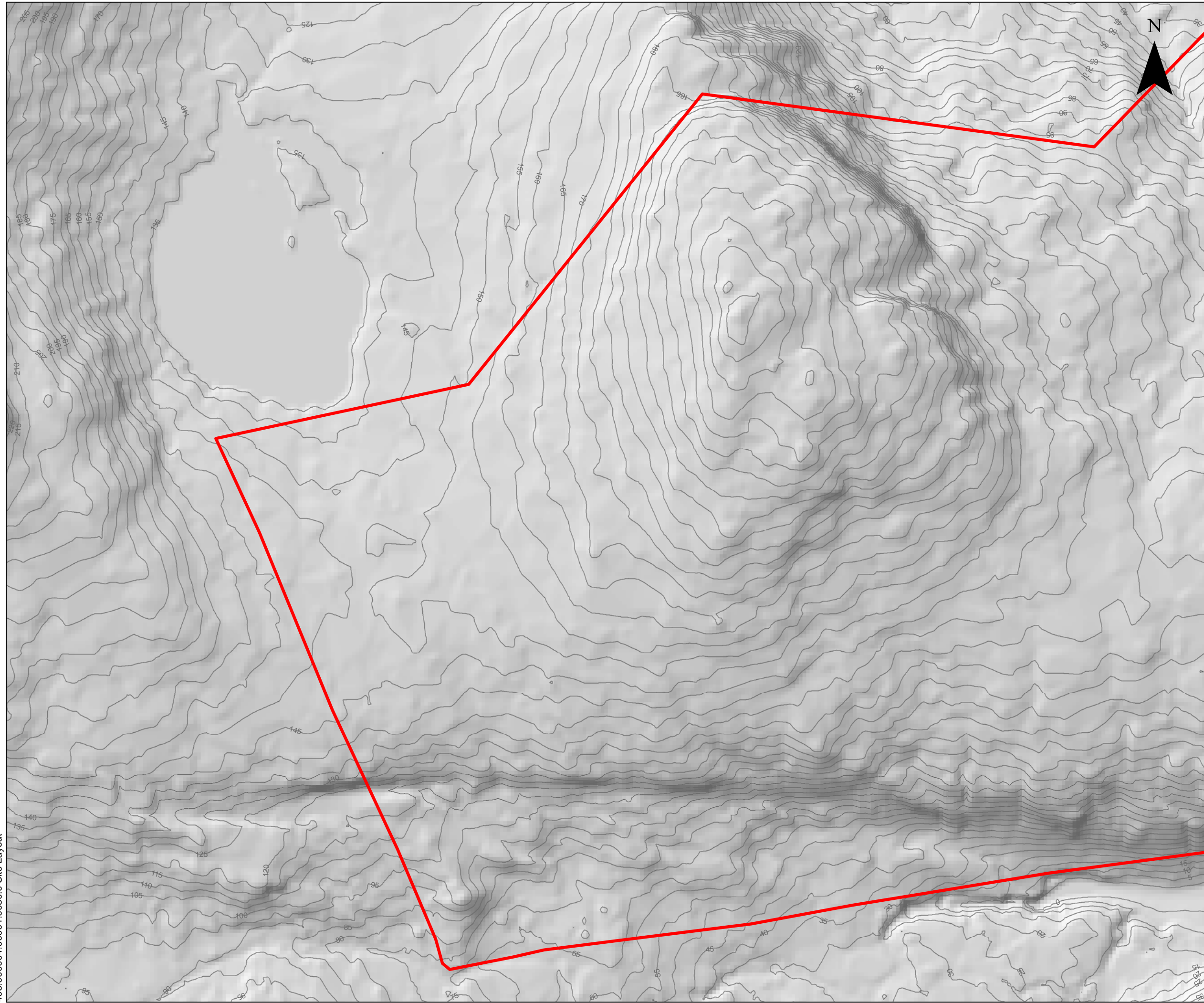
**SLR**

UISENIS WIND FARM - EIA  
 PLANNING STATEMENT  
 SITE LAYOUT  
**FIGURE 3k**

Scale 1:5,000 @ A3      Date AUGUST 2023

406.00004.00001.0080.0 Site Layout






**LEGEND**

Application

406.00004.00001.0080.0 Site Layout

**Eurowind Energy**



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**UISENIS WIND FARM - EIA**

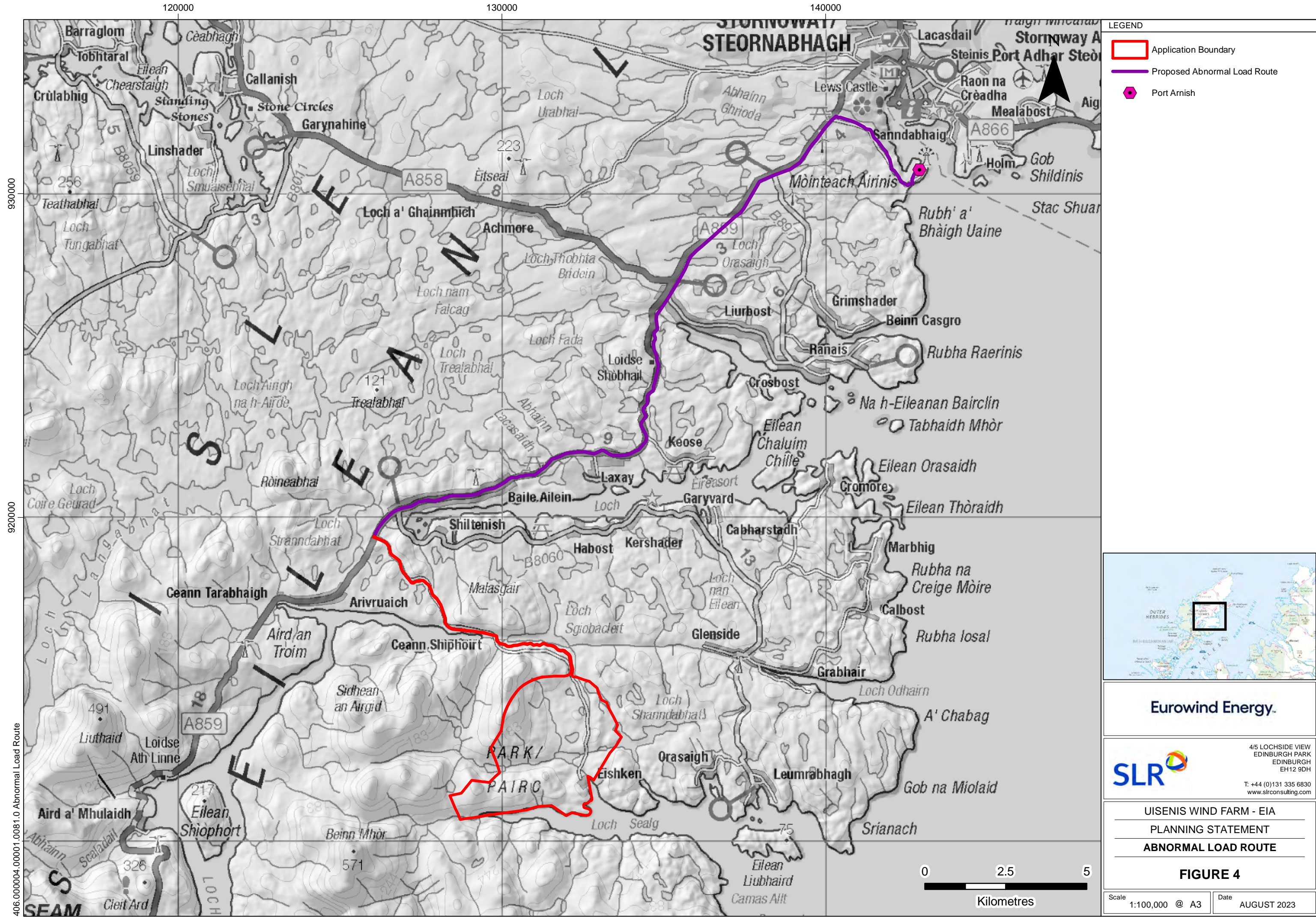
**PLANNING STATEMENT**

**SITE LAYOUT**

**FIGURE 3I**

Scale 1:5,000 @ A3	Date AUGUST 2023
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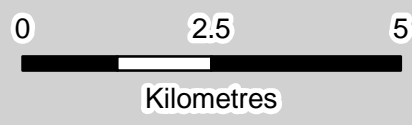


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**UISENIS WIND FARM - EIA  
 PLANNING STATEMENT  
 ABNORMAL LOAD ROUTE**

**FIGURE 4**  
 Scale 1:100,000 @ A3 Date AUGUST 2023



406.00004.00001.0081.0 Abnormal Load Route



# APPENDIX 01: INTERNATIONAL AND NATIONAL CLIMATE CHANGE AND RENEWABLE ENERGY CONTEXT

**Uisenis Wind Farm**  
Prepared for: Uisenis Power Limited

SLR Ref: 405.V64341.00001  
Version No: 1  
August 2023



## BASIS OF REPORT

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## 1.0 Climate Change and Renewable Energy

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

### 1.1 International Context

#### 1.1.1 United Nations Framework Convention on Climate Change

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

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

COP26 concluded with 197 countries agreeing to a new climate deal called the ‘Glasgow Climate Pact’ which strives to keep cutting emissions until they reach net-zero by 2050.

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

COP26 took place in Glasgow in November 2021 and all attending member parties revisited the climate pledges made under the ‘2015 Paris Agreement’. COP26 concluded with 197 countries agreeing to a new climate deal called the ‘Glasgow Climate Pact’ which strives to keep cutting emissions until they reach net-zero by 2050.

All countries agreed to speeding up the pace of climate action this decade and to revisit and strengthen their current emissions targets to 2030.

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

#### 1.1.2 Intergovernmental Panel on Climate Change

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

## 1.2 UK Context

### 1.2.1 Net Zero: The UK's Contribution to Stopping Global Warming (2019)

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

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

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

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

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

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

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

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

**Table 1-1: UK Carbon Budgets**

Budget	Carbon Budget Level	Reduction Below 1990 Levels	Budget Met?
1 <sup>st</sup> carbon budget (2008 – 2012)	3,018 MtCO <sub>2</sub> e	25%	Yes
2 <sup>nd</sup> carbon budget (2013 – 2017)	2,782 MtCO <sub>2</sub> e	31%	Yes
3 <sup>rd</sup> carbon budget (2018 – 2022)	2,544 MtCO <sub>2</sub> e	37%	On Track
4 <sup>th</sup> carbon budget (2023 – 2027)	1,950 MtCO <sub>2</sub> e	51%	Off Track
5 <sup>th</sup> carbon budget (2028 – 2032)	1,725 MtCO <sub>2</sub> e	57%	Off Track
6 <sup>th</sup> carbon budget (2033 – 2037)	965 MtCO <sub>2</sub> e	78%	Off Track
Net Zero Target	100%	By 2050	

### 1.2.2 The Sixth Carbon Budget

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

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

- take up of low carbon solutions;
- expansion of low carbon energy supplies including onshore wind;
- reducing demand for carbon intensive activities; and
- land and greenhouse gas removals.

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

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

### 1.2.3 Carbon Budget Delivery Plan 2023

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

The Carbon Budget Delivery Plan highlights how crucial renewable energy development is to meeting the Carbon budgets 4, 5 and 6, stating: “Delivering deep decarbonisation of power is key both to delivering sector carbon

*savings and unlocking the path to net zero across transport, industry, and heating buildings. Meeting growing demand while achieving the goal of decarbonising the power system by 2035 subject to security of supply needs substantial expansion of renewable low carbon generation.”.*

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

#### **1.2.4 British Energy Security Strategy 2022**

On 07 April 2022 the UK Government released their ‘British Energy Security Strategy’ focusing on how the Government plans to provide the UK with energy security and increased independence from a volatile international market. In Scotland, such planning rules are devolved, with the current Scottish Government considering their own policy of strengthening onshore wind deployment. Whilst not specifically pushing a boost to onshore wind, the Strategy does note: *“The growing proportion of our electricity coming from renewables reduces our exposure to volatile fossil fuel markets. Indeed, without the renewables we are putting on the grid today, and the green levies that support them, energy bills would be higher than they are now. But now we need to be bolder in removing the red tape that holds back new clean energy developments and exploit the potential of all renewable technologies”.*

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

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

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

#### **1.2.6 Net Zero Strategy: Build Back Greener 2021**

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

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

#### **1.2.7 Powering Up Britain (2023)**

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



### 1.2.8 Climate Change Committee Progress Report to Parliament (2023)

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

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

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

## 1.3 Scottish Context

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

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

### 1.3.1 The Climate Change (Scotland) Act 2009

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

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

### 1.3.2 Scottish Energy Strategy (2017)

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

The SES set a target for the equivalent of 50% of the energy for Scotland's heat, transport and electricity consumption to be supplied from renewable sources by 2030. This 50% target roughly equates to of 17GW of

installed capacity in 2030. In addition to setting energy targets, the SES also sets out six strategic priorities These include:

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

*Renewable and low carbon solutions – we will continue to champion and explore the potential of Scotland’s huge renewable energy resource, and its ability to meet our local and national heat, transport and electricity needs – helping to achieve our ambitious emissions reduction targets.”.*

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

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

### 1.3.3 The Climate Emergency Declaration

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

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

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

As detailed in Section 1.3.3, in May 2019 the Scottish Government formally declared a climate emergency. This resulted in the Climate Change (Emissions Reduction Targets) (Scotland) Act 2019, which amends the Climate Change (Scotland) Act 2009 and commits the Scottish Ministers to legally binding targets for net zero emissions. It amends the Climate Change (Scotland) Act 2009 and commits the Scottish Ministers to a new target of net zero emissions of all greenhouse gases by 2045, with interim targets for reductions of at least 56% by 2020, 75% by 2030 and 90% by 2040. These amended greenhouse emissions targets, and the series of annual targets towards them, represent a substantial increase over the targets set in the previous Act.

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

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

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

### 1.3.5 Climate Change Plan Update (2020)

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

The Climate Change Plan Update states that it is essential that a recovery from the COVID-19 pandemic *“responds*

*to the climate emergency” and “continues the rapid growth in renewables over the past 20 years, moving from a low to a zero-carbon electricity system”.*

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

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

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

The Scottish Government’s ‘*A stronger and more resilient Scotland*’ was published in September 2022. This document reaffirms the Scottish Government’s commitment to targets set out in prior programmes by confirming that these commitments *“remain in place and our ambition to deliver them is undiminished: the more so since we are clear that much of the answer to the current cost crisis and the poverty it will cause lies in our journey to net zero, investment in a strong economy, and in building a fairer society.”*

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

### **1.3.7 Onshore Wind Policy Statement 2022**

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

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

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

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

### **1.3.8 Draft Energy Strategy and Just Transition Plan 2023**

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

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

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

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

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

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

### 1.3.9 Progress Towards Targets

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

**Table 1-2: Progress Against Renewable Energy Targets**

Year	Target	Achieved/Progress
2020	Equivalent of 100% of all electricity used in Scotland to come from renewable sources. <sup>1</sup>	No – equivalent of 98.6% of all electricity used in Scotland came from renewable sources. <sup>2</sup>

<sup>1</sup> Scottish Government (2011) *2020 Renewable Routemap for Renewable Energy in Scotland Update 2011*

<sup>2</sup> Scottish Government Energy Statistics for Scotland – Q4 2020

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

Year	Target	Achieved/Progress
2021	Equivalent of 100% of all electricity used in Scotland to come from renewable sources. (continuation of 2020 target as target was not met)	No – equivalent of 85.2% of all electricity used in Scotland came from renewable sources ( <b>Graph 4-1</b> ).
2030	To increase the installed onshore wind capacity in Scotland to 20GW. <sup>3</sup>	Latest figures in September 2022 (most recently available) show that the installed onshore wind capacity in Scotland was 13.6GW. <sup>4</sup>
2030	To generate 50% of Scotland’s overall energy consumption from renewable sources. <sup>5</sup>	Final figures for 2020 indicate that the equivalent of 26.7% of total Scottish energy consumption came from renewable sources; the highest level to date. It increased from 24.0% in 2019 ( <b>Graph 4-2</b> ).
2050	To have decarbonised the energy system almost completely. <sup>5</sup>	Future target and difficult to gauge progress against.

**Table 1-3: Progress Against Greenhouse Gas Emissions Targets**

Year	Current Target <sup>6</sup> (% Reduction of Emissions relative to 1990)	Recommended Target <sup>7</sup> (% Reduction of Emissions relative to 1990)	Achieved/Progress <sup>8</sup>
2020	56% reduction.	N/A	Achieved – GHG account reduced by 59% between the baseline period and 2020. As detailed in the Scottish Emissions Targets – First Five-Yearly Review (December 2022): “The fall in emissions in 2020 was largely due to the travel restrictions during the COVID-19 pandemic and it is unlikely the target would have been achieved without the impacts of the pandemic.”.
2021	57.9%	51.1%	Not achieved – GHG account reduced by 49.9% between baseline period and 2021.
2022	59.8%	53.8%	Most recent data available is 2021 figure.
2023	61.7%	56.4%	Most recent data available is 2021 figure.
2024	63.6%	59.1%	Most recent data available is 2021 figure.
2025	65.5%	61.7%	Most recent data available is 2021 figure.
2026	67.4%	64.4%	Most recent data available is 2021 figure.

<sup>3</sup> Scottish Government *Onshore Wind Policy Statement 2022*

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

<sup>4</sup> Scottish Government *Energy Statistics for Scotland – Q3 2022*

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

<sup>5</sup> Scottish Government (2017). *The future of energy in Scotland: Scottish energy strategy* 20 December 2017

<sup>6</sup> Scottish Government (2019). Climate Change (Emissions Reduction Targets) (Scotland) Act 2019

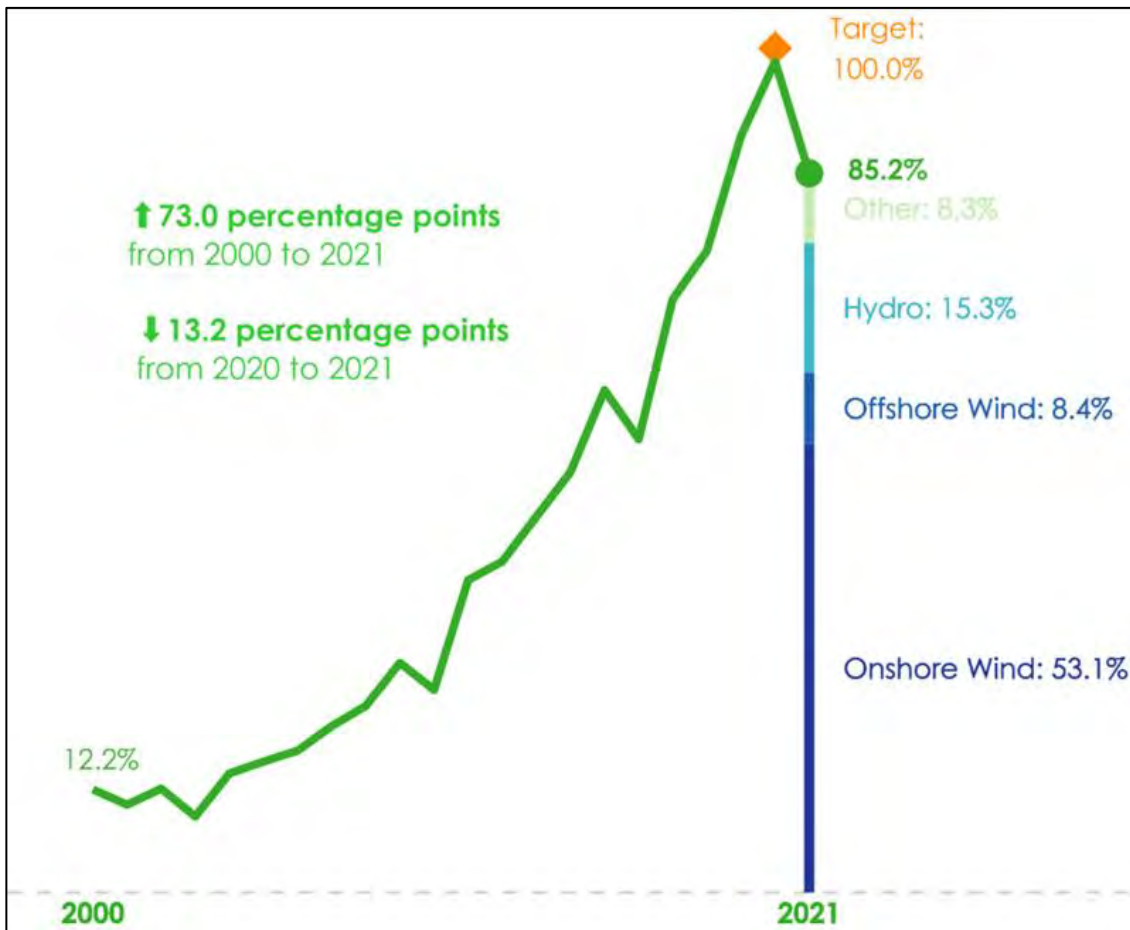
<sup>7</sup> Independent Climate Change Committee (2022). *Scottish Emissions Targets – First Five-Yearly Review*

<sup>8</sup> Scottish Government *Scottish Greenhouse Gas Statistics 2021*:

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

Year	Current Target <sup>6</sup> (% Reduction of Emissions relative to 1990)	Recommended Target <sup>7</sup> (% Reduction of Emissions relative to 1990)	Achieved/Progress <sup>8</sup>
2027	69.3%	67.0%	Most recent data available is 2021 figure.
2028	71.2%	69.7%	Most recent data available is 2021 figure.
2029	73.1%	72.3%	Most recent data available is 2021 figure.
2030	75% reduction.		Most recent data available is 2021 figure.
2040	90% reduction.		Most recent data available is 2021 figure.
2045	100% reduction.		Most recent data available is 2021 figure.

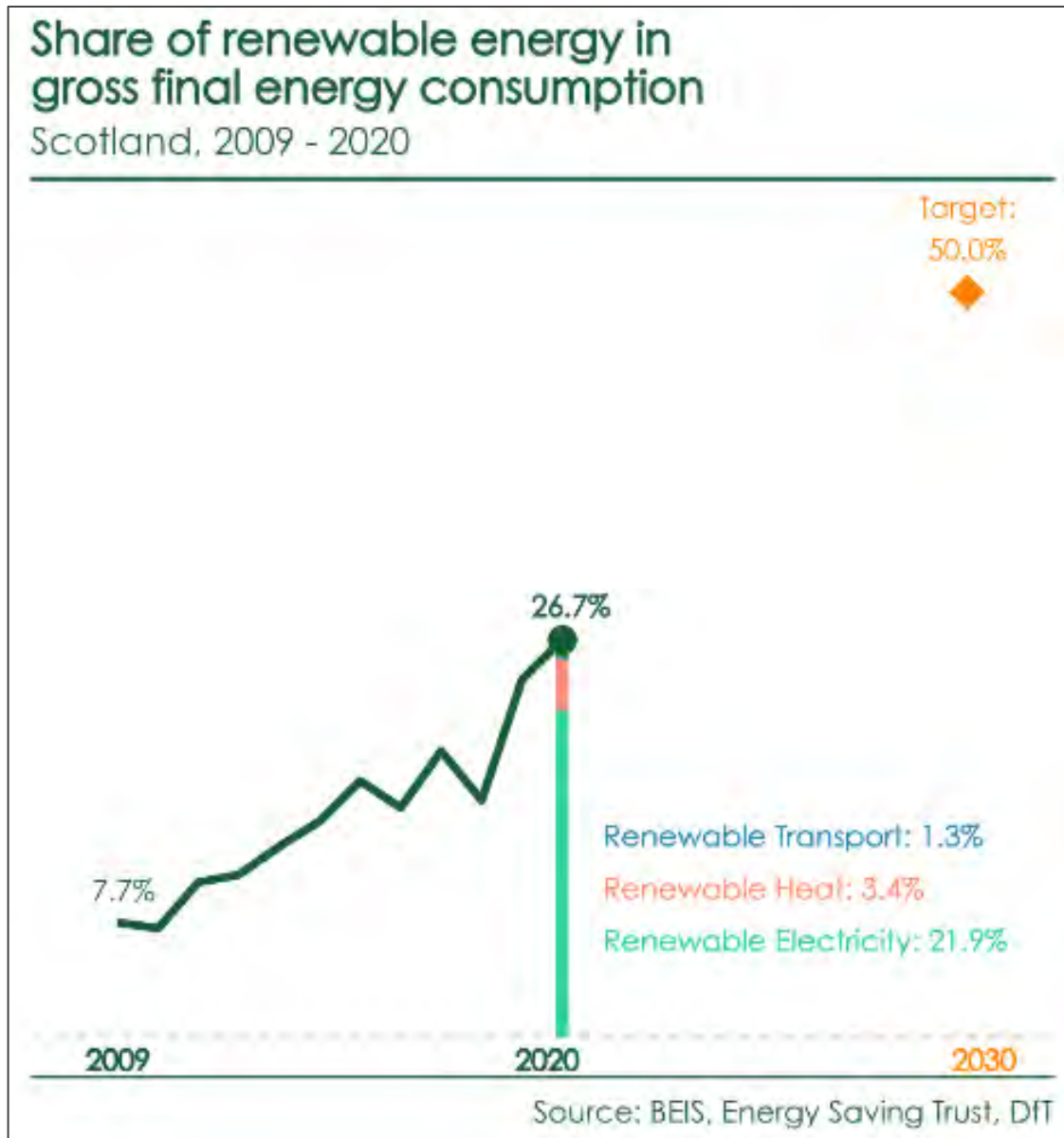
**Graph 1-1: Renewable Electricity Generation in Scotland**



Source: Energy Statistics for Scotland Q3 2022



Graph 1-2: Progress Against Renewable Energy Targets



(Scottish Energy Statistics Hub, 2022)

## 1.4 Conclusions

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

The IPCC has repeatedly flagged the challenge that the world faces in addressing climate change and the stark reality of needing to reach net-zero, with real and significant progress by 2030. Scotland has long considered itself at the forefront when it comes to robust targets for reducing green house gas emissions and fighting climate change. However, as detailed in Section 1.3.9, Scotland did not meet its 2020 target for 100% of all electricity used in Scotland to come from renewable sources (it also did not meet this target in 2021). Scotland did meet its 2020 target of a 56% reduction of green house gas emissions relative to 1990, however this was largely due to

the impact of the COVID-19 pandemic, and evidence shows emissions rebounded in 2021. Scotland therefore did not meet either the current or recommended 2021 target for emissions reductions.

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

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



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