

Environmental Impact Assessment

Sandy Knowe Wind Farm Extension

Chapter 4: Planning and Energy Policy

ERG UK Holding Ltd



July 2022



Chapter Contents

4	Planning and Energy Policy	2
4.1	Introduction	2
4.2	The Electricity Act 1989	2
4.3	The Town and Country Planning (Scotland) Act 1997	3
4.4	National Planning Policy	3
4.4.1	National Planning Framework 3	3
4.4.2	The Fourth National Planning Framework (NPF4) Draft	4
4.4.3	Scottish Planning Policy	5
4.4.4	Planning Advice Notes	6
4.5	Local Planning Policy	6
4.5.1	Dumfries and Galloway Local Development Plan (LDP2) 2019	7
4.5.2	Supplementary Guidance: Wind Energy Development: Development Management Considerations	8
4.5.3	Supplementary guidance: Part 1 Wind Energy Development: Development Management Considerations Appendix 'C' The Dumfries and Galloway Wind Farm Landscape Capacity Study (DGWFLCS)	9
4.6	Climate Change and Energy Policy	9
4.6.1	Introduction	9
4.6.2	The Climate Emergency	9
4.6.3	International Climate Change Agreements	10
4.6.4	UK Climate Change Programme	11
4.6.5	Scotland Climate Change Programme	12
4.7	References	15

Figures

None

List of Technical Appendices

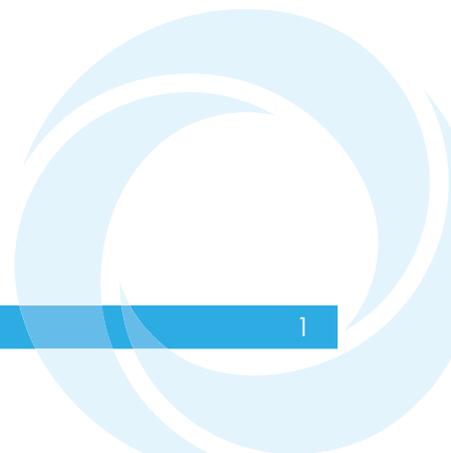
Appendix 2-1: ECU Gatecheck 1 Report

Glossary of Terms

Term	Definition
The Applicant	ERG UK Holding Limited
The Agent	Atmos Consulting Limited
Environmental Impact Assessment	Environmental Impact Assessment (EIA) is a means of carrying out, in a systematic way, an assessment of the likely significant environmental effects from a development
Environmental Impact Assessment Regulations	The Electricity Works (Environmental Impact Assessment) (Scotland) Regulations 2017 (EIA Regulations)
Environmental Impact Assessment Report	A document reporting the findings of the EIA and produced in accordance with the EIA Regulations
The Proposed Development	The Sandy Knowe Wind Farm Extension
The Proposed Development Footprint	The area within which the Proposed Development will be located
The Proposed Development Site	The full application boundary including Sandy Knowe Wind Farm and Sandy Knowe Wind Farm Extension
The Planning Act	The Town and Country Planning (Scotland) Act 1997
Electricity Act	The Electricity Act 1989 (as amended)

List of Abbreviations

Abbreviation	Description
DGG	Dumfries and Galloway Council
DGCLDP2	Dumfries and Galloway Council Local Development Plan 2
EIA	Environmental Impact Assessment
EIAR	Environmental Impact Assessment Report
ECU	Energy Consents Unit
LDP	Local Development Plan
NPF	National Planning Framework
SPP	Scottish Planning Policy



4 Planning and Energy Policy

4.1 Introduction

This chapter provides an overview of planning and energy policy and other guidance relevant to the Proposed Development, in particular those that have informed the evolution of the design. Topic specific policy detailed in the relevant topic chapters (Chapters 5-13).

It is not the purpose of this chapter to provide a planning assessment of the Proposed Development against these policies. Detailed analysis of the Proposed Development is contained within a separate Planning Statement, which is submitted with the application. That document contains a brief description of the Proposed Development, the rationale for the proposal, a summary of the findings of the EIAR and consideration of the application against the Development Plan and key planning and other policy requirements.

4.2 The Electricity Act 1989

Although the output of the Proposed Development will be less than 50MW, the Proposed Development will require consent and deemed planning permission by Scottish Ministers under Section 36 of the Electricity Act 1989 (as amended) (The Electricity Act) given it is an extension to the Sandy Knowe Wind Farm which was granted consent and deemed planning permission under the Electricity Act in July 2019.

The 'person operating the station' will be the same entity for both the Sandy Knowe Wind Farm and the Proposed Development. Furthermore, the Proposed Development will share infrastructure components with the Sandy Knowe Wind Farm including access tracks and substation.

The ownership and operator will be the same entity for both the Sandy Knowe Wind Farm and the Proposed Development, which has been designed as an extension of the Sandy Knowe Wind Farm. Furthermore, the Proposed Development will share infrastructure components with the Sandy Knowe Wind Farm including access tracks and substation.

A decision on the Section 36 application under the Electricity Act is the principal decision to be made in this case. Although the consenting authority in this instance is the Scottish Ministers, Schedule 8 of the Electricity Act 1989 requires the relevant local planning authorities are consulted on planning matters; in this case Dumfries & Galloway Council.

In accordance with Schedule 9, the Applicant shall have regard to the desirability of preserving natural beauty, conserving flora and fauna and geological or physiographical features of special interest and of protecting sites, buildings and objects of architectural, historical or archaeological interest. The Applicant shall, within reason, do what they reasonably can to mitigate any effect the Proposed Development might have on these features.

These matters have been considered during the design process for the Proposed Development and are addressed in this EIA Report. Assessments of these features have

been undertaken and are described along with a summary of the proposed mitigation measures in the relevant chapters of the EIA Report to mitigate potential environmental effects upon these assets. A tabulated summary of mitigation is also found in Chapter 14 Schedule of Mitigation.

4.3 The Town and Country Planning (Scotland) Act 1997

The principle statutory development consent is an electricity consent granted under Section 36 of the Electricity Act.

Section 57 of the Town and Country Planning (Scotland) Act 1997 (the 'Planning Act') addresses development with Government authorisation. Section 57(2) states that:

“On granting or varying a consent under section 36 or 37 of the Electricity Act 1989, the Scottish Ministers may give a direction for planning permission to be deemed to be granted, subject to such conditions (if any) as may be specified in the direction, for – (a) so much of the operation or change of use to which the consent relates as constitutes development; (b) any development ancillary to the operational change of use to which the consent relates”.

The duty under Section 25 of the Planning Act, to determine the application in accordance with the provisions of the development plan unless material considerations indicate otherwise, does not apply as the application is made under the Electricity Act. The development plan is however a relevant and important consideration. The policies within the development plan have therefore informed the design evolution of the Proposed Development.

As part of the planning reform, the Planning (Scotland) Act 2019 received Royal Assent on 25 July 2019.

The Act aspired to strengthen “*inclusive growth, housing and infrastructure delivery and empowering communities*” (Scottish Government 2018) and it is anticipated that local authorities will have more scope for local planning to influence regional and national plans.

The Planning etc. (Scotland) Act 2006 introduced additional processes in relation to the scale of development proposals. Although not required as a Section 36 application, given the scale of the Proposed Development, the Applicant has followed good practice in submitting a Design and Access Statement and a Pre-Application Consultation Report.

4.4 National Planning Policy

4.4.1 National Planning Framework 3

The Third National Planning Framework (NPF3) is a long-term plan for Scotland that sets out where development and infrastructure is needed. Together with the Scottish Planning Policy, NPF3 provides a clear national vision of what is expected of the planning system and the outcomes that it must deliver for the people of Scotland.

Work to produce the fourth National Planning Framework (NPF4) to replace NPF3 commenced in 2020 and a draft NPF4 was laid before the Scottish Parliament in November 2021. Ahead of NPF4 being adopted (anticipated in late summer 2022), NPF3 (and Scottish Planning Policy), both adopted in 2014 remain in place. The NPF3

identifies national developments and other strategically important development opportunities in Scotland and is accompanied by an Action Programme.

The Scottish Government's central purpose is to create a more successful country, with opportunities for all of Scotland to flourish, through increasing sustainable economic growth.

To achieve this, The Scottish Government Economic Strategy aims to share the benefits of growth by encouraging economic activity and investment across all of Scotland's communities, whilst protecting natural and cultural assets.

Scotland's Economic Strategy (March 2015) focuses on the two mutually supportive goals of increasing competitiveness and tackling inequality and is based on a set of priorities which include; *"Investing in our people and our infrastructure in a sustainable way; and Fostering a culture of innovation and research and development"*.

The creation of a low carbon place is a key element of the vision for Scotland, part of which is the ambition to be a world leader in low carbon energy generation, both onshore and offshore. Alongside this sits the aim to create a natural, resilient place where natural and cultural assets are respected, improving in condition and representing a sustainable economic, environmental and social resource for the nation.

Whilst good progress is being made in diversifying Scotland's energy generation capacity and lowering the carbon emissions associated with it, the NPF3 acknowledges that more action is needed. Maintaining security of supplies and addressing fuel poverty remain key objectives.

NPF3 is clear that the Scottish Government wants to continue to capitalise on Scotland's wind resource with a growing focus on marine energy. That said, policy is clear that onshore wind must continue to make a significant contribution to diversification of energy supplies.

4.4.2 The Fourth National Planning Framework (NPF4) Draft

The Draft NPF4 was published in November 2021. It is intended as a long-term plan, that will guide spatial development, set out national planning policies, designate national developments and highlight regional spatial priorities. NPF4 will be different to NPF3. Once approved, it will have increased status and will become part of the statutory Development Plan meaning that its policies will have a stronger role in day-to-day planning decision making. It is a policy consideration which is relevant to the Proposed Development as it informs to delivery of the 'net zero agenda' through four key themes; sustainable places, liveable places, productive places and distinctive places.

NPF4 will incorporate updated Scottish Planning Policy into one document and Part 3 of the draft NPF4 contains proposed new 'National Planning Policy'. For the first time, spatial and thematic planning policies will be addressed in one place. In terms of policy for sustainable places it sets out that

"To achieve a net zero, nature positive Scotland, we must rebalance our planning system so that climate change and nature recovery are the primary guiding principles for all our plans and all our decisions. That includes emissions reduction and the adaptations we need to make in order to be resilient to the risks created by a warmer climate."

In terms of renewable energy generation, the framework acknowledges the need to;

“diversify and expand renewable energy generation”

and specifies that;

“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”

and

“National development supports renewable electricity generation, repowering, and expansion of the electricity grid”

noting that;

“a large increase in electricity generation will be essential for Scotland to meet its net zero emissions targets”.

Policy 2 ‘Climate Emergency’, states that

“when considering all development proposals significant weight should be given to the Global Climate Emergency”.

This indicates that climate change should be a guiding principle for decision making and that substantial policy support is given to any proposed development which makes a substantial contribution towards climate change targets.

Policy 19: ‘Green Energy’ states that Local Development Plans should seek to support renewable energy developments. This policy also states wind development in National Parks and National Scenic areas should not be supported but that development outwith these areas should be supported, unless impacts (including cumulative effects) are unacceptable. The introduction to Policy 19 states;

“Scotland’s energy sector has a significant role to play in reducing carbon emissions and contributing to a green, fair and resilient economic recovery. A wide range of renewable technologies are capable of delivering these benefits, although it is likely that the onshore wind sector will play the greatest role in the coming years. The planning system should support all forms of renewable energy development and energy storage, together with new and replacement transmission and distribution infrastructure.”

It is important to note that whilst NPF4 is currently being finalised by the Scottish Government, NPF3 will remain in place.

4.4.3 Scottish Planning Policy

Scottish Planning Policy (SPP) is Scottish Government policy on how nationally important land use planning matters should be addressed across the country. The latest SPP was published in June 2014.

This Policy sets out national planning policies which reflect the Scottish Ministers’ priorities for operation of the planning system and for land use and development. It aims to promote a sustainable place; supporting economic growth, regeneration and appropriately designed development.

In particular its principal policies include consideration of sustainable economic development, rural development, historic environment, landscape and natural

heritage, open space and physical activity and health, transport, renewable energy, flooding and drainage and waste management.

SPP articulates the four desired planning outcomes. Of particular relevance to the Proposed Development are:

- Outcome 1: A successful, sustainable place;
- Outcome 2: A low carbon place; and
- Outcome 3: A natural, resilient place.

The SPP Policy Principles states that the planning system should; *“support the transformational change to a low carbon economy, consistent with national objectives and targets...”* and *“support the development of a diverse range of electricity generation from renewable energy technologies – including the expansion of renewable energy generation capacity...”*.

SPP sets out that proposals for energy infrastructure developments should always take account of spatial frameworks for wind farms where these are relevant and sets out key considerations for proposals. These include net economic impact; the scale of contribution to renewable energy generation targets; effect on greenhouse gas emissions; cumulative effects; impacts on communities and individual dwellings and landscape and visual impacts.

4.4.4 Planning Advice Notes

The Scottish Government has published a number of Planning Advice Notes (PANs) covering a variety of subjects. The following are considered of relevance to this application as they have informed the EIAR;

- Circular 1/2017: Environmental Impact Assessment Regulations;
- Circular 2/2011: Planning and Archaeology;
- Circular 3/2010: Community Engagement;
- PAN 51: Planning, Environmental Protection and Regulation;
- PAN 60: Natural Heritage;
- PAN 62: Radio Telecommunications;
- PAN 73: Rural Diversification; and
- PAN 75: Planning for Transport.

4.5 Local Planning Policy

The Local Development Plan for the Proposed Development comprises:

- Dumfries and Galloway Council Local Development Plan 2 (DGC LDP2) (October 2019);
- Supplementary guidance: Wind Energy Development: Development Management Considerations (February 2020a); and
- Supplementary guidance: Part 1 Wind Energy Development: Development Management Considerations Appendix 'C' DGWFLCS (February 2020b).

4.5.1 Dumfries and Galloway Local Development Plan (LDP2) 2019

The DGC LDP2 was adopted in October 2019 and it provides the planning framework and guides the future use and development of land in towns, villages and the rural area. It also indicates where development, including regeneration, should and should not happen.

The overarching principle of the LDP2 is that:

“all development proposals should support sustainable development, including the reduction of carbon and other greenhouse gas emissions”.

The LDP recognises that climate change is a pressing issue globally and outlines policies specific to renewable energy developments. The LDP provides a spatial framework for development of wind energy, in line with the requirements of SPP. All turbines of the Proposed Development are located within the Group 3 area with potential for wind farm development. There is an area of ground within the Proposed Development Footprint that is identified as a Group 1 - area of significant protection. In line with the principles of the design process (See Chapter 3 – Description of Development) the Proposed Development has avoided this area.

Policies directly relevant to the Proposed Development include Policies IN1: Renewable Energy and IN2: Wind Energy.

Policy IN1 states that the Council will support development proposals for all renewable energy generation and/or storage which are located, sited and designed appropriately. The acceptability of the Proposed Development;

“will be determined through an assessment of the details of the proposal including its benefits and the extent to which its environmental and cumulative impacts can be satisfactorily addressed”.

In line with SPP, considerations for acceptability will consider the following:

- Landscape and visual impact (Chapter 5 Landscape and Visual Impact Assessment);
- Cumulative impact (through the EIA from Chapter 5-12);
- Impact on local communities and individual dwellings, including visual impact and residential amenity (Chapter 5 Landscape and Visual Impact Assessment);
- Impact on local communities and individual dwellings including Noise (Chapter 11 Noise);
- Impact on local communities and individual dwellings including shadow flicker (Chapter 13 Other Considerations);
- Impact on the historic environment (Chapter 10 Cultural Heritage);
- Impact on the natural environment including biodiversity (Chapter 6 Ecology; Chapter 7 Ornithology; and Chapter 8 Hydrology, Hydrogeology and Soils);
- Impact on forestry and woodlands (Chapter 6 Ecology); and
- Impact on tourism, recreational interests and public access (Chapter 12 Socio-economics, Tourism, Recreation and Land Use).

Policy IN2 indicates support for development where it can be accommodated without unacceptable adverse significant effects and cross references other relevant policies. The acceptability of the Proposed Development is determined in the same way as IN1. However, the following *additional* criteria should be considered:

- Socio-economic benefits (Chapter 12 Socio-economics, Tourism, Recreation and Land Use);
- Impact on infrastructure (Chapter 9 - Transport and Access; and Chapter 13 Other Considerations); and
- Impact on aviation and defence interests (Chapter 13 Other Considerations).

The LDP2 contains other policies relevant to the Proposed Development which have the overarching aim to encourage prosperous and sustainable communities and businesses, balanced with protecting and improving the quality of the environment. These are:

- Policy OP1: Development Considerations;
- Policy OP2: Design Quality and Placemaking;
- Policy ED9: Tourism;
- Policy ED11: Dark Skies;
- Policy HE1: Listed Buildings;
- Policy HE2: Conservation Areas;
- Policy HE3: Archaeology;
- Policy HE4: Archaeologically Sensitive Areas;
- Policy HE6: Gardens and Designated Landscapes;
- Policy NE2: Regional Scenic Areas;
- Policy NE3: Areas of Wild Land;
- Policy NE4: Sites of international importance for biodiversity;
- Policy NE5: Species of international importance;
- Policy NE6: Sites of national importance for biodiversity and geodiversity;
- Policy NE7: Forestry and Woodland;
- Policy NE8: Trees and Development;
- Policy NE11: Supporting the Water Environment;
- Policy NE12: Supporting the Water Environment;
- Policy NE15: Protection and Restoration of Peat Deposits as Carbon Sinks;
- Policy IN11: Telecommunications; and
- Policy T1: Transport Infrastructure.

4.5.2 Supplementary Guidance: Wind Energy Development: Development Management Considerations

The 'Wind Energy Development: Development Management Considerations' Supplementary Guidance (February 2020) provides further detail in support of the development management considerations in Policy IN2 'Wind Energy'.

It sets out a statement on the main factors that are to be taken into account in reaching planning decisions and details the criteria contained in the policy.

4.5.3 Supplementary guidance: Part 1 Wind Energy Development: Development Management Considerations Appendix 'C' The Dumfries and Galloway Wind Farm Landscape Capacity Study (DGWFLCS)

The Dumfries and Galloway Wind Farm Landscape Capacity Study (DGWFLCS) is used to inform decision making. The document seeks to set out the key characteristic and sensitivities to wind farm development within the Dumfries and Galloway administrative area.

The potential landscape and visual effects of the Proposed Development are assessed in EIAR Chapter 5: Landscape and Visual Impact Assessment.

4.6 Climate Change and Energy Policy

4.6.1 Introduction

Climate change has been described as the greatest environmental challenge facing the world today, with the declaration of the global climate emergency in April 2019 and continued publicity around increasing devastating global climate events linked to climate change to date.

The burning of fossil fuels to produce electricity is a major contributor to climate change through the release of atmospheric carbon dioxide (CO₂) and other harmful gases known collectively as greenhouse gases. As part of the response to climate change, the UK and Scottish Governments have entered into binding international agreements, committing to reducing greenhouse gas emissions.

Furthermore, there is a clear national focus, during the current COVID-19 crisis, to ensure a 'green recovery' for Scotland.

The generation of electricity from renewable energy sources is one of the principal ways in which the Government targets to reduce greenhouse gas emissions are to be met within the current policy framework.

The following sections set out key UK and Scottish Policies that are central to the requirement for the Proposed Development.

4.6.2 The Climate Emergency

Both the UK and Scottish Government have declared a Climate Emergency (BBC, 2019). While there is no formal obligation to act associated with this status it does emphasise a public and political desire to increase the effort to combat climate change and may result in climate change targets being brought forward.

Dumfries and Galloway Council also declared a climate emergency on 19 June 2019 and noted the urgency to respond to climate change and transition to a carbon neutral region. In doing so, Dumfries and Galloway Council created a 12-point action plan to reinstate the pursuit of net zero carbon emissions in the region, protect fragile biodiversity and natural environment.

Some of those action plan points are:

"... 2. We recognise the challenges ahead to tackle climate change and, whilst we have already made significant strides towards achievement of a regional net zero carbon status, we will seek to achieve this outcome by the year 2025 and, wherever possible embrace opportunities to accelerate our target date;

...

5. We will embed climate change considerations into all policy and practice risk assessments to ensure a continuous focus on the implications our actions may have on our environment, and ensure that measures to reduce or eliminate carbon emissions are acted on;

...

8. We will embrace innovative measures and respond as a priority to technological advances which can reduce our region's impact on climate change. This will enable opportunities to contribute to the economic development and diversity of our region by supporting businesses and communities which can benefit from schemes and projects which support our priority to tackle climate change;

...

11. We will commit to working closely with other local authorities, statutory agencies, public and private sector organisations and our communities to achieve carbon reduction outcomes and will seek to identify and share best practice;"

4.6.3 International Climate Change Agreements

COP26 – The Glasgow Climate Pact

On 31 October 2021, the long-awaited COP26 climate summit begun in Glasgow. Once again, world leaders and delegates from almost 200 countries were in attendance, alongside tens of thousands of negotiators, government representatives, businesses and members of the public for 13 days of discussions and negotiations.

On the final day of the conference (13 November 2021) the parties agreed to the Glasgow Climate Pact, a global agreement with the aim of accelerating action on climate change to 2030 and limiting the rise of global temperature to 1.5 degrees, in line with the Paris Agreement (2015).

The Glasgow Climate Pact calls on countries to revisit and strengthen their 2030 targets by the end of 2022 to align them with the Paris Agreement's temperature goals. Countries also agreed to return in 2022 with a new UN climate programme on mitigation ambition and that they finalised the Paris Rulebook.

It should be noted the Pact states that:

"The Glasgow Climate Pact only keeps 1.5C in sight if countries take concerted and immediate action to deliver on their commitments. This means phasing down coal power, halting and reversing deforestation, speeding up the switch to electric vehicles and reducing methane emissions."

4.6.4 UK Climate Change Programme

Sixth Carbon Budget 2020

Following on from the Climate Change Committee's (CCC) Net Zero - The UK's Contribution to Stopping Global Warming 2019, the CCC (CCC, 2020) published its recommendations for the UK's Sixth Carbon Budget which will run from 2033 to 2037 with the aim of achieving a fully decarbonised UK economy.

The principal recommendation from the CCC is that the UK sets a Sixth Carbon Budget to require a reduction in UK greenhouse gas emissions of 78% by 2035 relative to 1990, or a 63% reduction from 2019.

The sixth budget, imposed by the Carbon Budget Order 2021 on 24 June, covers the years 2033-2037. The UK Government set the budget at 965 million tonnes of carbon dioxide equivalent. This is in line with the CCC's recommendation.

Net Zero Strategy: Build Back Greener

In October 2021, the UK Government's Net Zero Strategy was presented to the UK Parliament in accordance with Section 14 of the Climate Change Act 2008. It acknowledges the devastating impact that the increase of global temperatures has already had on the UK through flooding and disruption to major services.

In line with the Paris Agreement, reference is made to potentially catastrophic events that will unfold should global warming increase above 1.5 degrees. It is recognised that in order to meet the Paris Agreement, urgent global action is needed hence why the UK called for ending coal fired power generation, retiring petrol and diesel engines from all cars, and halting deforestation at COP26.

The strategy sets out clear policies and proposals for keeping the UK on track for forthcoming carbon budgets, ambitious Nationally Determined Contribution (NDC), and the UK Government's vision for a decarbonised economy in 2050.

The strategy has a number of commitments for reducing emissions across the economy in relation to power generation. For instance, the target that the UK government will take action so that by 2035, all electricity will come from low carbon sources, bringing forward the government's commitment to a fully decarbonised power system by 15 years.

In 2019, net UK GHG emissions from the power sector totalled 58 tonnes of CO₂ and accounted for 11% of total net UK GHG emissions. This is a reduction of 72% between 1990 and 2019. In 1990, the power sector accounted for 23% of UK GHG emissions. This has largely been achieved through renewables and natural gas generation displacing coal.

The UK Government's vision is that low carbon forms of energy generation will be the paradigm shift away from the use of unabated oil and gas. Low carbon energy is expected to account for a 50% or higher share of final energy consumption. This shift to low carbon energy is expected to account for up to 76% reduction in emissions by 2030; up to 85% by 2035 and 98% by 2050, when compared with 2019 emissions.

In delivering this strategy of decarbonising the power sector, significant public and private investment is needed and will see new employment opportunities across the UK.

The UK Government estimate that policies and proposals to reduce emissions in the sector could support up to 59,000 jobs by 2024 and up to 120,000 jobs by 2030.

UK Climate Change Risk Assessment 2022

The third UK Climate Change Risk Assessment (CCRA3) report was presented to Parliament on 17 January 2022 and outlines the UK government and devolved administrations' position on the key climate change risks and opportunities that the UK faces.

The Technical Report for the CCRA3 identified 61 UK-wide climate risks and opportunities across multiple sectors such as energy; agriculture; people; transport and biodiversity if there is a 2- and 4-degree global warming scenario.

Of the 61 climate risks and opportunities 34 risks are assessed as 'more action needed' at a UK-wide level. This means that new, stronger, or different government action is required in the next five years over and above those already planned.

Some of the risks include:

- Risk to soils from changing climatic conditions, including seasonal aridity and wetness;
- Risks and opportunities for natural carbon stores, carbon sequestration and GHG emissions from changing climatic conditions, including temperature change and water scarcity;
- Risks to and opportunities for agricultural productivity from extreme events and changing climatic conditions (including temperature change, water scarcity, wildfire, flooding, coastal erosion, wind and saline intrusion);
- Risks to infrastructure services from river, surface water and groundwater flooding;
- Risks to public water supplies from reduced water availability;
- Risks to health and wellbeing from high temperatures;
- Risks to people, communities and buildings from river and surface flooding; and
- Risks to UK food availability, safety, and quality from climate change overseas.

4.6.5 Scotland Climate Change Programme

Climate Change (Emission Reduction Targets) (Scotland) Act 2019

Amending the 2009 Climate Change (Scotland) Act, this Act emphasises the need to deliver renewable energy targets and focuses on giving considerable weighting to the determination of renewable energy proposals including wind farm applications in areas where the principle of development has already been established.

The Act strengthens Scotland's climate change targets for the reduction of emission levels from an 80% reduction by 2050 (as set out in the Climate Change (Scotland) Act 2009), to 100% by 2045. Renewable energy projects, such as the Proposed Development, play a key role in supporting the decarbonisation of the energy sector.

Scotland's Climate Assembly: Recommendations for Action (2021)

As required by the Climate Change (Emissions Reduction Targets) (Scotland) Act 2019 the Assembly on climate change was established. The Assembly comprises a group of over 100 people selected to be representative of Scotland's adult population. The

Assembly published their Recommendations for Action in June 2021. The Recommendations for Action outlined several goals and recommendations across a variety of sectors aimed at addressing the climate emergency in an effective and fair way. The report identified eradicating fossil fuels as a priority through the maximisation of the amount of energy produced by renewables.

The Scottish Government issued their Response to Scotland's Climate Assembly (Scottish Government, 2021) in December 2021. The Scottish Government set out their intention to publish an Energy Strategy Just Transition Plan for which a draft document will be available for consultation in Autumn 2022.

[Towards a Robust, Resilient Wellbeing Economy for Scotland, a report of the Advisory Group on Economic Recovery \(June 2020\)](#)

Established by the Scottish Government in April 2020, the advisory group focusses on the economic recovery following the Covid pandemic. It recognises that the pandemic provides the opportunity to reevaluate Scotland's economic ambition.

In particular, there is a renewed emphasis on the need to accelerate a low carbon economy and support renewable technology with the aspiration of tackling climate change and developing a resilient economy.

[Update to the Climate Change Plan 2018-2032: Securing a Green Recovery on a Path to Net Zero](#)

The Scottish Government published its updated Climate Change Plan in December 2020. This update to the 2018-2032 Climate Change Plan, along with the Scottish Government's Energy Strategy Update (2021) provides the strategic framework for the transition to a low carbon Scotland.

The Update sets ambitious new targets to end Scotland's contribution to climate change by 2045 and sets out the commitment to reduce emissions by 75% by 2030 (compared with 1990) and to net zero by 2045. It states that COVID-19 does not change Scotland's ambitions and indeed, gives Scotland the opportunity to lead the way in meeting climate change targets.

[Scottish Energy Strategy \(2017\)](#)

The Scottish Energy Strategy (SES): The Future of Energy in Scotland was published in December 2017 and set out the Scottish Government's vision for the future energy system in Scotland. It articulates six energy priorities for a whole-system approach that considers both the use and the supply of energy for heat, power and transport.

Sitting alongside the Climate Change Plan, SES is intended to strengthen the development of local energy, protect and empower consumers, and support Scotland's climate change ambitions while tackling poor energy provision.

Built around a series of six energy priorities, the SES will guide the decisions that the Scottish Government, working with partner organisations, needs to make over the coming decades.

Specifically in relation to renewable energy generation, this includes the commitment to;

“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 sets two new targets for the Scottish energy system by 2030:

- The equivalent of 50% of the energy for Scotland's heat, transport and electricity consumption to be supplied from renewable sources; and
- An increase by 30% in the productivity of energy use across the Scottish economy.

For the longer term the SES states 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”.

It is important to note that this commitment has been brought forward to 2045 following the Climate Change (Emission Reduction Targets) (Scotland) Act 2019 and the noted in Scotland's Energy Position Statement (2021).

In setting out this target, the Scottish Government analysis that sits behind it is described as indicating that renewable electricity – which has already outperformed an;

“interim 2015 target of 50% – could rise to over 140% of Scottish electricity consumption, ensuring its contribution to the wider renewable energy target for 2030.”; and

“This assumes a considerably higher market penetration of renewable electricity than today – requiring in the region of 17 GW of installed capacity in 2030 (compared to 9.5 GW in June 2017) – with greater interconnection with parts of continental Europe providing an expanded market for our electricity”.

In championing the potential of Scotland's huge renewable energy resource, the SES recognises that renewable and low carbon energy will provide the foundation of the envisaged future energy system and considers onshore wind to be amongst the lowest cost forms of renewable power generation.

The SES is clear that onshore wind should continue to play a vital role in decarbonising Scotland's energy systems and confirms the importance of supporting onshore wind development, including the extension and replacement of existing sites with larger turbines, in the right places.

Identifying and providing a route to market for onshore wind energy is recognised in the SES as key to achieving the objectives and vision of the strategy and refers to further detail provided in the Scottish Government Onshore Wind Policy Statement which was published alongside the SES.

Scotland's Energy Position Statement (2021)

Published in March 2021 the Position Statement emphasises that Scotland has the most ambitious legislative framework for emissions reduction in the world and a particularly challenging interim target for 2030, underpinned by a legal commitment to deliver a just transition. It recognises that Scotland is making progress towards its target and in 2019 Scotland 90% of its gross electricity consumption from renewables.

The Statement set out to provide a clear overview of policies in relation to energy ahead of COP26 in November 2021. It reinforces Scotland's commitment to *"supporting the increase of onshore wind in the right places to help meet the target of Net Zero."* whilst ensuring a green, fair and resilient recovery for the Scottish economy.

Onshore Wind Policy Statement

The Onshore Wind Policy Statement (OWPS) published in December 2017 sets out the Scottish Government's policy position on Onshore Wind and re-affirmed the SES in setting out an important role for onshore wind in achieving Scotland's renewable energy targets.

It also recognises the wider economic and industrial opportunity that growing the onshore wind sector represents. In doing so it also acknowledges the uncertain route to market that faces new development proposals and recognises the role that a *"supportive and well-resourced planning system"* will play in addressing that. Similarly, the need for continued innovation and cost reduction is clear.

The ongoing technological development in the sector and the availability of larger wind turbines with greater output is recognised in the OWPS which states Scottish Government support for development of larger (taller) wind turbines in appropriately sited locations where the landscape is judged to be capable of supporting them.

Larger scale developments, capable of exploiting better wind resource are more likely to achieve a cost-effective route to market and therefore make the continued contribution to targets.

The Onshore Wind Policy Statement Refresh 2021: Consultative Draft, published in October 2021, revisits the OWPS and seeks responses on the Scottish Government's ambitions to secure an additional 8-12 GW of installed onshore wind capacity by 2030. The Statement notes Scotland's current installed onshore capacity of 8.4GW and Scotland's aim to maintain supportive policy and regulatory framework to enable an increase in renewable energy deployment and meet this considerable challenge.

4.7 References

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