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Beinneun 2 Wind Farm

Planning Statement

August 2025

PlanA

PlanA

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Introduction

Background

Plan A Consultancy Ltd have been appointed by Envams Ltd on behalf of Beinneun 2 Ltd ('the Applicant') to provide planning support to the proposed Beinneun 2 Wind Farm ('the Development'), on land approximately 5.4 kilometres ('km') northwest of Invergarry and approximately 11.3 km southwest of Fort Augustus, Highland.

The Development comprises up to 19 wind turbines with a maximum height to blade tip of 200 metres ('m') and a generation capacity of up to approximately 140 Mega Watts ('MW'). This would be supported by a Battery Energy Storage System ('BESS') with a maximum export capacity of up to approximately 160MW. The total export capacity of the Development will exceed 50MW.

The application is for consent under Section 36 of The Electricity Act 1989 and deemed planning consent under Section 57(2) of the Town and Country Planning (Scotland) Act 1997 (as amended) ('the TCPA'). Accordingly, the application will be decided by Scottish Ministers via the Energy Consents Unit ('ECU').

This Planning Statement outlines the key characteristics and details of the Development and summarises the relevant planning policy context before providing an appraisal of the Development against all relevant material considerations. In doing so, the Planning Statement demonstrates the need for the Development and the balance of material considerations which are required to form a reasonable judgement on the merits of the proposed development.

An Environmental Impact Assessment Report ('EIAR') has been prepared under the Electricity Act (Environmental Impact Assessment) (Scotland) Regulations 2017 ('the EIA Regulations') and has been submitted as part of this application. This Planning Statement draws from that EIAR to provide evidence in support of the application and to demonstrate the level of compliance with policies as applicable.

The Applicant

Beinneun 2 Ltd is a project company established to deliver the Beinneun 2 Wind Farm. The project is being developed by a team with extensive experience in the renewable energy sector, including the development, construction and operation of onshore wind energy projects across Scotland and the UK.

Screening and Scoping

To determine the requirement for an Environmental Impact Assessment, development proposals are screened against the EIA Regulations to ascertain whether a development would constitute EIA development. The Development is of a type described within Schedule 2 of the EIA Regulations as an installation for the

harnessing of wind power for energy productions. It is not located within a 'sensitive area' as defined by the EIA Regulations; however the project would exceed both of the applicable thresholds as it involves more than two wind turbines with hub heights of more than 15 m.

The requirement for an EIA was therefore determined by the Applicant based on whether the project would be likely to give rise to significant effects on the environment by virtue of its size, nature or location. The scale, nature and location of the Development were considered such that, in order to allow the environmental impacts of the project to be appropriately considered throughout the application process, an EIAR would be required.

Pursuant to the provisions of Regulation 12 of the EIA Regulations 2017, in November 2023 the Applicant submitted an EIA Scoping Report to accompany a request for an EIA Scoping Opinion from the Scottish Ministers. The Scottish Ministers issued their Scoping Opinion in February 2024 which set out the topics to be addressed in the EIA. This Scoping Opinion is included within the EIAR as Technical Appendix A2.1.

Scoping is a voluntary process, and the responses received as part of this process are advice associated with the methodologies put forward by the Applicant for the determination and potential for likely significant environmental effects. The EIA Scoping process therefore provides an accompanying background to the planning context for the policy analysis associated with the Development.

Pre-Application Consultation

The Applicant submitted a pre-application enquiry to The Highland Council on 2nd August 2024 (24/03327/PREMAJ). The Highland Council responded with written comments on the Development on 4th December 2024, following a virtual meeting on 6th November 2024. The comments covered all topics with the exception of Landscape and Visual considerations which haven't, at the time of writing, been received.

The comments provided highlight that The Highland Council is supportive of renewable energy developments in principle and the proposal would increase production of renewable energy. However, this commitment has to be taken in balance along with all other considerations of a particular site, and despite National Planning Framework 4's ('NPF4') strong position of 'in principle' support for such energy developments, they should still be located, sited, and designed appropriately and thus comply with the wider development plan policies.

It is also set out that the Development will be assessed against the policies contained in NPF4and the Highland-wide Local Development Plan ('HwLDP') 2012, Inner Moray Firth Local Development Plan 2 ('IMFLDP2') 2024, West Highland and Islands Local Development Plan ('WestPlan') 2019, and associated Supplementary Guidance. This Planning Statement constitutes that requested assessment. Efforts have been made to address the observations made by The Highland Council in their response.

Structure of this Document

The remainder of this Planning Statement is structured as follows:

- *The Development*: provides a summary of the main components associated with the Development, an overview of the Site and its surroundings, as well as a summary of the design evolution;
- *Renewable Energy Policy Framework*: provides a summary of the wider renewable energy policy context relevant to the Development;
- *Planning Policy Framework*: outlines and summarises the relevant statutory Development Plan and other material considerations relevant to the Development;
- *Planning Assessment*: provides a planning appraisal of the Development against the relevant provisions of the Development Plan and other material considerations including principle and acceptability of the Development; and
- *Conclusions:* presents the overall summary and conclusions.

The Development

The Development is described in full within Chapter 4: Development Description within Volume 1 of the accompanying EIAR - it is summarised here. Chapter 4 of the EIAR in turn forms the basis of Chapters 5 to 14 of the EIAR which contain the technical assessments upon which this Planning Statement relies. The description of development is also supported within Technical Appendix A4.1 where an Outline Construction Environmental Management Plan ('OCEMP') has been prepared.

This section of the Planning Statement describes the site and its surroundings and then provides an overview of the Development by each component.

Site Description and Surroundings

The Site consists of open moorland, with no existing network of tracks. The surrounding area is characterised by further rolling hills featuring open moorland and upland heath, commercial forestry and woodland, and several water bodies. The topography of the Site varies; ranging from 260 metres (m) Above Ordnance Datum (AOD) to 490m AOD in the west of the Site, to 370m AOD to 660m AOD in the east of the Site. The only named hilltop within the Site is Mullach Core Ardachaidh, at 530 AOD. There are a number of watercourses located within the Site, including Caochan Riabhach and Allt Dubh.

The nearby major roads include the A87 to the south and west of the Site, and the A887 located to the north of the Site. The Site will be accessed from the A87 in the west of the Site at approximately NGR 219586, 806801.

There are several settlements surrounding, the Site including (but not limited to):

- Invergarry, located approximately 5.4 km southeast of the Site;

- Fort Augustus, located approximately 11.3 km northwest of the Site; and
- Invermoriston, located approximately 18.2 km northeast of the Site.

There are six Core Paths within 5 km of the Site with the nearest of which being the River Garry Path, located 3.2 km southeast of the Site.

Description of the Development

The main components of the Development are:

- Up to 19 wind turbines and external transformers (if required), each with a maximum tip height of up to 200 m;
- Associated foundations and crane hardstandings at each wind turbine location;
- Access tracks totalling approximately 17.5 km in length;
- Battery Energy Storage System ('BESS') compound containing approximately 27 40-ft (or equivalent) battery containers;
- One meteorological mast;
- Underground cabling;
- A substation compound; and
- Two construction and storage compounds (one of which would be at the substation/BESS compound location).

Borrow pits are also proposed, with four areas of search included in the proposals with specific designs to follow consent, when the detail of design is known following turbine selection.

The purpose of the Development is to generate electricity from a renewable source of energy, offsetting the need for power generation from the combustion of fossil fuels. Consequently, the electricity that will be produced results in a saving in emissions of carbon dioxide ('CO_2') with associated environmental benefits. Carbon savings are set out in Chapter 10: Climate Change.

Chapter 4 of the EIAR provides Table 4.1 which outlines the key parameters of the Development, which has been replicated below. The Development and its infrastructure layout can be viewed in full within Figure 4.1 of the EIAR.

Table 1: Key Parameters of the Development

Element	Details
Turbines	Up to 19 turbines, with a maximum tip height of up to 200 m. Each turbine will require a small transformer located either inside the tower or adjacent to the turbine.
Foundations and Crane Hardstandings	Each foundation would be designed according to the geotechnical site investigations undertaken during pre-construction works to establish the nature of the subsoil condition at each turbine location. Typically, foundations are expected to have an approximate diameter of 25 m.

Element	Details
	The main working area at each hardstanding area composed of crushed stone will be approximately 115 m by 70 m (depending on the turbine manufacturer's specifications), the footprint of the main hardstanding will be up to approximately 3,600 m^2, as shown on Figure 4.4. In addition to the main hardstanding area, there will be smaller hardstanding areas for the crane assist and blade finger areas. Additional flattened areas will be used for crane assembly and turbine blade storage; however, these will be temporary and not constitute hardstanding.
Access Tracks	The Site access will be afforded via an existing entrance point off the A87, at approximately NGR 219586, 806801 (Figures 4.1 and 4.12). Taking access via the west of the Site, the length of onsite access tracks will comprise of 23.8 km of new tracks These new tracks will be constructed of a graded stone as appropriate for the ground conditions. The access tracks will require 23 new watercourse crossings. The type and design of each watercourse crossing will be dependent on the stream morphology, peak flows, local topography and ecological requirements, and will be chosen so as to avoid or minimise potential environmental effects.
BESS Compound	The BESS compound will be constructed at approximately NGR 223507, 804875. This will be made up of approximately 27 no. 40-ft (or equivalent) BESS containers and will measure approximately 100 m by 100 m. It will have an instantaneous power output of up to approximately 160 MW. The battery units will be supported by Power Control System ('PCS') units, comprising inverters and transformers, required to connect the batteries to the substation.
Meteorological Mast	One meteorological mast of height up to 149.9 m, will be installed at NGR 220250, 805734. It will be free-standing or secured with guy wires.
Electrical Cabling	Onsite cabling will be laid underground alongside or within the access tracks where possible, linking the turbine transformers to the wind farm control building, substation and the BESS. Cables will be laid at a depth of approximately 1 m below ground level.
Substation Compound	A substation compound with a control building will be located in the southeast of the Site at approximately NGR 223411, 804848, measuring approximately 100 m by 100 m with external transformer and connection equipment. The compound will also include space for any Distribution Network Operator equipment to facilitate the grid connection.
Construction Compound	Two construction compounds will be required during the construction of the Development, forming an area of hardstanding providing space for temporary construction cabins, parking and lay down areas. The first will measure approximately 130 m by 60 m and be located within the west of the Site, at approximately NGR 220551, 805946. Due to the size of the Site, a second construction compound will be required which will be located at the site of the substation and BESS compounds. The substation and BESS components will be constructed on the site of this temporary construction compound near the completion of the construction of the Development.

The Development comprises 19 three-bladed horizontal axis wind turbines, with a maximum tip height of up to 200 m. Indicative turbine dimensions are shown on Figure 4.2 within Chapter 4 of the EIAR. Table 2 details the locations of each turbine.

Table 2: Wind Turbine Co-ordinates and Elevations

Turbine No.	Easting	Northing	Maximum Turbine Tip Height (m)	Base Elevation (m) AOD
T1	220661	806534	200	399
T2	220767	805955	200	450
T3	220182	805374	200	479
T4	220196	804821	200	492
T5	220633	804335	200	448
T6	221378	804594	200	412
T7	222090	804595	200	409
T8	222736	804789	200	414
T9	222945	804299	200	352
T10	223449	805199	200	438
T11	224176	805530	200	458
T12	224483	805104	200	407
T13	224850	805801	200	478
T14	225412	805717	200	457
T15	225764	805397	200	389
T16	225607	806484	200	512
T17	226228	806492	200	490
T18	226530	806045	200	461
T19	226436	805411	200	399

Renewable Energy Policy Framework

Introduction

This section aims to introduce the key renewable energy framework that comprises key evidence upon which to determine the Development. This section sets out the primary contents of relevant documents, whilst further sections analyse the level of compliance in detail.

International and European Context

The Paris Agreement

In December 2015, 196 countries adopted the first ever legally binding global climate deal, which entered into force in November 2016. The Paris Agreement is part of the United National Framework Convention on Climate Change and provides a global plan towards climate neutrality and aims to prevent the increase in rising global temperatures to well below 2 degrees Celsius above pre-industrial levels. In turn, the Paris Agreement upon ratification by the UK Government paved the way for the UK Government's commitments in legislative provisions.

United National Intergovernmental Panel on Climate Change ('IPCC')

The IPCC's 6th Assessment Report was published in March 2023 and set out that it is likely that warming will exceed 1.5 degrees Celsius during the 21st century and make it harder to limit to 2 degrees Celsius. It states on page 12 that *"every increment of global warming will intensify multiple and concurrent hazards… Deep, rapid and sustained reductions in greenhouse gas emissions would lead to a discernible slowdown in global warming within around two decades".* It further suggests on page 24 that there is a "*rapidly closing window of opportunity to secure a sustainable and liveable future for all".*

COP26 – Glasgow

In October and November 2021, the COP26 climate summit took place in Glasgow. On the final day of the conference the world leaders 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 The Glasgow Climate Pact requires countries to revisit and strengthen their 2030 targets to align them with the Paris Agreement's temperature goals. Notably the press release accompanying 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".*

COP27 – Sharm el-Sheikh

The aim of COP27 was to reiterate the commitment to tackling the challenges of climate change, particularly in relation to the current energy crisis. During the summit the Sharm el-Sheikh Implementation Plan was agreed. Article 3 of this refers to the solution which renewable energy presents to climate change. The urgent need to rapidly produce sustainable reductions in greenhouse gas emissions and importance of "*enhancing a clean energy mix*" are stressed in Article 3.8 and 3.10 respectively.

COP28 – Dubai

The COP28 meeting took place in November and December 2023. During this conference in November and December 2023, an agreement was reached on the inaugural 'global stocktake,' urging participating parties to undertake measures to triple renewable energy capacity and double energy efficiency improvements by 2030. Simultaneously, there was an emphasis on reducing unabated coal power and eliminating inefficient fossil fuel subsidies. Developed countries were tasked with taking the lead in these efforts, reflecting their advanced economic statuses. Parties were encouraged to align with the Paris Agreement's goal of limiting global warming to 1.5°C above pre-industrial levels.

The UN Emissions Gap Report

The UN Emissions Gap Report, published in October 2024, provides an independent science-based assessment of the gap between pledged greenhouse gas reductions and the reductions required to align with the Paris Agreement. The Report states within its first page that there must be "*unprecedented cuts to greenhouse gas emissions by 2030*" to have any chance of meeting 1.5 degrees Celsius rise. Ominously, the Key Messages document accompanying the Report states that if only current pledges are implemented and no further ambition is shown, "*the best we could expect to achieve is catastrophic global warming of up to 2.6 degrees Celsius over the course of the century*". It is noted that 2024 was the first year in which a global mean temperature of more than 1.5°C above the pre-industrial average was recorded[1].

UK Energy Policy

The UK Government is legally committed to the delivery of a reduction in emissions to 'net zero' by 2050. This section identifies recent shifts in UK-wide Renewable Energy Policy to accommodate this.

In May 2019, the Committee for Climate Change ('CCC') published a landmark report entitled 'Net Zero – UK's Contribution to Stopping Global Warming'. It sets out that "(*the CCC has) reviewed the latest scientific evidence on climate change, including last year's IPCC special report on global warming of 1.5 degrees Celsius and considered the appropriate role of the UK in the global challenge to limit future*

[1] https://wmo.int/news/media-centre/wmo-confirms-2024-warmest-year-record-about-155degc-above-pre-industrial-level

temperature increases." It also states that "*Net Zero is a more fundamental aim than previous targets. By reducing emissions produced in the UK to zero, we also end our contribution to rising global temperatures*."

The report makes UK-wide recommendations including a new, more stringent emissions target of net zero greenhouse gas by 2050, therefore ending the UK's contribution to global warming within 30 years. This replaces the previous target of an 80% reduction by 2050 from a 1990 baseline and accords with the obligations under the Paris Agreement. The report highlights that at a UK level "*current policy is insufficient for even the existing targets*."

The CCC Annual Report to Parliament (2020) offered an update on the progress towards Net Zero following adoption of the Net Zero Target. The report states that in terms of building a resilient post-Covid economy, "*success requires that net zero emissions and improved climate resilience are integral*," whilst investments towards achieving net zero will "*help create jobs and stimulate economic recovery, whilst changing the course of UK emissions and improving our resilience to climate change*."

The National Audit Office offered an update report 'Achieving Net Zero' in December 2020 regarding progress on achieving Net Zero following the change to legislation in June 2019. Key points from the report include that reducing emissions to achieve net zero will require wide ranging changes to the UK economy including further investment in renewable energy, changes "*unprecedented in their overall scale*." Page 22 of the report sets out that a national increase in renewable energy capacity is needed by a scale of around 400%.

The CCC set out the sixth UK-wide carbon budget in December 2020 with recommendations covering a period between 2033 to 2037. This sets out the path the UK must follow to achieve Net Zero by 2050. A key point includes the CCC's clear statement that new demand for electricity will mean that demand will rise 50% by 2035 and perhaps doubling or trebling by 2050. This in turn states that "*UK climate targets cannot be met without strong policy action in Scotland*", and that means that the UK (and by implication, Scotland) will require more and faster deployment of renewable energy developments than has happened in the past.

The UK Government then set out the UK Energy White Paper in December 2020. This re-iterated that "*electricity is a key enabler for the transition away from fossil fuels and decarbonising the economy by 2050*" with a key policy objective to "*accelerate the deployment of clean electricity generation through the 2020s*". The White Paper states that the onshore wind sector will be a key "building block" of the future mix, with sustained growth needed in the capacity of these sectors.

The UK Government then published the UK Net Zero Strategy in October 2021 which sets out the long-term pathway to net zero by 2050, setting out the UK Government's plans to reduce emissions from each sector of the economy. It states that the Government will support sustained deployment of low carbon generation and that there is a need to continue to drive rapid deployment of renewables.

In January 2022, the third UK Government Climate Change Risk Assessment was published and outlines the risks faced by the UK Government and its devolved governments. It identifies 61 UK-wide climate risks and opportunities across multiple sectors. Of these 61 risks, 34 were assessed as 'more action needed', meaning stronger, new or different government action is needed to provide a solution to the risk. These include risks across aridity, wetness, carbon storage, water scarcity, agricultural productivity, coastal erosion and flooding.

The CCC produced a report to Parliament in July 2024 regarding the progress in reducing emissions. The report stated that the quickest, cheapest and fastest way to reduce vulnerability to global fossil fuel markets is to boost British renewable energy. The report assessed that to be on track for the UK Government's interim 2030 target of 68% of 1990 levels, that only a third of the emissions reductions required are currently covered by credible plans and therefore action is needed across all sectors The priority actions on page 9 of the report state that the UK should be in a phase of rapid investment and delivery, however all indicators for low carbon technology rollout are off track, with rates needing to significantly ramp up, with onshore wind doubling and low carbon technology needing to quickly become the default option.

The UK Government's Clean Power 2030 Action Plan was published in December 2024 and outlines the UK government's strategy to generate enough clean power to meet the UK's total annual electricity demand whilst increasing energy security. It highlights the series of complex reforms currently taking place to the grid network in 2025 to meet this demand, including planning processes to accelerate consenting for transmission and distribution infrastructure. In the UK as at Q2 2024, Clean Power 2030 states that there is a UK wide installed capacity of 14.2GW of onshore wind throughout the UK, with a further 4.4GW either committed or under construction. This leaves a gap of between 8.4GW and 10.4GW to achieve the Clean Power capacity range of between 27 and 29GW of onshore energy by 2030. It is realistic to assume that not all current applications will go ahead within this.

The CCC produced a report to Parliament in June 2025 regarding the progress in reducing emissions. The report states "*Climate change is here, now. Until the world reaches Net Zero CO2 emissions, with deep reductions in other greenhouse gases, global temperatures will continue to rise.*" The report goes on to record that the UK's target to reduce emissions by 68% on 1990 levels by 2030, the Nationally Determined Contribution to the Paris Agreement and the first UK target consistent with achieving Net Zero in 2050 is within reach '*provided the Government stays the course*.'

The report also determined that '*Progress to date has been primarily driven by decarbonisation of the electricity system, with renewables replacing both coal and, increasingly, gas.'.* Progress since 2024 was noted which included the removal of planning barriers in the onshore wind sector (amongst others). The removal of the planning barrier supported an increase in capacity in the sector. Whilst the report assessed that the operational capacity of renewables needs to more than double by 2030, the onshore wind sector is currently on track to achieve 2030 targets. The reports states that '…*total roll-out of offshore and onshore wind and solar capacity increased in 2024 by more than the increase seen in any of the previous six years.'.*

A number of priority recommendations are identified for the Scottish Government which address carbon budgets, cross-cutting plans, updates to National Policy Statements and seeking continued improvement in surface transport, agriculture and land use, industry, buildings and waste sectors.

Scottish Renewable Energy Policy

This section identifies recent shifts in Scottish Renewable Energy Policy and summarises key documents.

Scottish Renewable Policy to 2022

When it was enacted, the Climate Change (Scotland) Act 2009 set world leading greenhouse gas emissions reduction targets, including a target to reduce emissions by 80% by 2050. However, the Climate Change (Emissions Reduction Targets) (Scotland) Act 2019 amends the 2009 Act sets even more ambitious targets – which reflect the recommendations of the CCC for a net zero greenhouse gas emissions target by 2045 at the latest, with challenging interim stages – a 75% reduction target by 2030 and 90% by 2040.

The Scottish Energy Strategy 2017 sets out the Scottish Government's overarching position on many forms of energy, including onshore wind. Specifically, it states that "*onshore wind must continue to play a vital role in Scotland's future … this can be done in a way which is compatible with Scotland's magnificent landscapes*.". These reiterate the findings of the Onshore Wind Policy Statement and aim to drive Scotland towards Net Zero by 20245, with a clear focus on the delivery of 12GW of new installed capacity by 2030. The Draft Energy Strategy and Just Transition Plan (2023) then updates and supersede the 2017 document once fully adopted. The Draft states that we need to transform the way Scotland generates, transports, and uses energy, in order to realise climate change ambitions. The requirement for an additional 12GW of onshore wind is a key policy facet of this document. The document also provides discussion of the role of battery storage and the contribution towards Net Zero BESS systems can play.

The Scottish Energy Strategy Position Statement (March 2021) reinforces the consistent theme of the Scottish Government's support for a green, fair, and resilient economy. Onshore renewables are addressed within section 8 of the Statement where it is reported that "*the continued growth of Scotland's renewable energy industry is fundamental to enable us to achieve our ambition of creating sustainable jobs as we transition to net zero*". It adds that the Scottish Government "is committed to supporting the increase of onshore wind in the right places to help meet the target of net zero."

In 2024, the interim targets for 2030 and 2040 were repealed as the progress to meet these targets was deemed not achievable by the Scottish Government. However, the updated Climate Change (Scotland) Act 2009 (as amended) retains the target for a net zero greenhouse gas emissions target by 2045.

Whilst progress is being made, achieving the 2045 target requires ongoing and immediate action. The continuing development of the renewable energy sector is a key part in helping meet that net zero target.

Bute House Agreement

In August 2021, the Scottish Government and the Scottish Green Party signed the Bute House Agreement which represented a formal co-operation agreement until 2026. It states that "the climate emergency means we need to use the limited powers we have to accelerate the decarbonisation of our energy system…our plans will see a significant increase in electricity demand for heating and transport. To accommodate this, we will support the continued and accelerated deployment of renewable energy." Following the CCC Report to the Scottish Parliament in March 2024, on 25th April 2024, the Bute House Agreement ended, and the Scottish Government acknowledged that the target of cutting emissions by 75% by 2030 was out of reach. The annual and interim targets were scrapped and replaced by a carbon budget system measuring emissions every five years.

Onshore Wind Policy Statement and Sector Deal

The Onshore Wind Policy Statement ('OWPS') published in December 2022 makes it clear that seeking greater security of supply and lower cost electricity are now key policy facets alongside the need to deal with the climate emergency. It requires a minimum installed capacity of 20GW of onshore wind by 2030, with an additional 12GW installed between 2023 and 2030. The OWPS states that deployment of onshore wind is "*mission-critical for meeting our climate targets*" as an *"affordable and reliable source of electricity generation*.". It explains that Scotland's peak demand for electricity will at least double within the next twenty years which will require a substantial increase in installed capacity across all renewable technologies.

The OWPS also highlights the other contributions that the onshore wind sector should have to achieving net zero, including playing an important part in peatland protection, peatland restoration efforts, protection and enhancement of biodiversity, and the creation of new woodland. The OWPS also paved the way for a Sector Deal. The Onshore Wind Sector Deal, published in September 2023, provides a schedule of commitments between Scottish Government and the onshore wind sector to promote the rapid development and deployment of onshore wind. It includes, for example, the specific requirement to decrease consenting times as well as encouraging proportionate EIA and encouraging solutions to issues in the grid and aviation sectors.

The Onshore Wind Sector Deal sets out on page 14 that an analysis will be provided of the expected pipeline of new onshore wind projects, extensions to existing projects, life extensions and repowering projects expected in the period between 2023 and 2030. The information is to be updated at least bi-annually and to fulfil this, BVG Associates produced 'Scotland Onshore Wind Pipeline Analysis 2023-2030' in November 2023. If these are not met, then there will be negative consequences for

the onshore wind pipeline. The BVG figures added and superseded the numbers presented within the OWPS of 2022.

The BVG Report sets out that in 2023, there is 9.32GW of operational onshore wind in Scotland, with 13.09GW in the pipeline. The pipeline is subcategorised into 6.14GW awaiting construction, and 0.96GW under construction, with 6.8GW in the planning system awaiting consent.

It must be acknowledged that not all schemes in planning will get consent, and there is duplication of schemes awaiting construction where for example a tip height increase applies.

The BVG Report estimates that expected onshore capacity in 2030 would be around 18.8GW, meaning there is still some work to do, with the Report also providing actions which could be taken to increase the likelihood of reaching the 20GW target in 2030.

As stated above within the UK section, the Clean Power 2030 Action Plan also recognises a clear gap in provision and that Scotland will have to make up much of the shortfall to 27-29GW by 2030 – requiring at least an additional 8.4GW from those schemes without consent.

Committee for Climate Change

The CCC published the Scotland's Carbon Budgets, Advice for the Scottish Government report in May 2025. The Climate Change (Scotland) Act 2009 (as amended) sets an ambitious target to reach Net Zero greenhouse gas emissions by 2045. As Scotland's interim targets for 2030 and 2040 were repealed, this report by the CCC sets out advice on the level of Scotland's carbon budget for the period from 2026 to 2045.

The report recommends '…*that the Scottish Government sets its carbon budgets, including Scotland's share of international aviation and shipping emissions, at annual average levels of emissions that are:*

- 57% lower than 1990 levels for the First Carbon Budget (2026 to 2030).
- 69% lower than 1990 levels for the Second Carbon Budget (2031 to 2035).
- 80% lower than 1990 levels for the Third Carbon Budget (2036 to 2040).
- 94% lower than 1990 levels for the Fourth Carbon Budget (2041 to 2045).'

The report states that these carbon budgets are deliverable and Scotland can still achieve its 2045 Net Zero target.

With regard to renewables, the report recommends that electricity supply is fully decarbonised by 2030, with the capacity of variable renewables (which includes onshore wind) increasing to 49GW by 2035 and 66GW in 2045. Key to achieving these targets for electricity supply will include improvements in the planning system and

continued work in the area of low-carbon dispatchable generation technologies, such as gas and carbon storage.

The report also acknowledges the role that the onshore wind sector offers in supporting the transition from the oil and gas industry within Scotland, in terms of providing future opportunities for growth and employment,

Planning Policy Framework

Introduction

An application under Section 36 of the Electricity Act 1989 for consent for the construction of an electricity generating station whose capacity exceeds 50 megawatts ('MW') is significantly different from an application for planning permission for a generating station whose capacity is 50MW or less. Section 25 of the Town and Country Planning (Scotland) Act 1997 (as amended) does not apply to the determination of applications under Section 36 as confirmed in the case of *William Grant & Sons Distillers Ltd v Scottish Ministers* [2012] CSOH 98.

In accordance with paragraph 3(2) of Schedule 9 to the Electricity Act 1989, the Scottish Ministers are obliged to have regard to the desirability of the matters mentioned in paragraph 3(1)(a). The Applicant has provided sufficient information to enable the Scottish Ministers to address these duties. In considering the overall statutory and regulatory framework within which the Development should be assessed, the statutory Development Plan is a material consideration which should be given important weighting with all other relevant material considerations. It is important to note, however, that Section 25 of the TCPA is not engaged as there is no 'primacy' of the Development Plan in determining an application made under Section 36 of the Electricity Act 1989.

The remainder of this section sets out the primary planning policy considerations of the Development Plan, whilst an appraisal of the level of accordance with it is made in the context of other material considerations within the Planning Assessment section. The Development Plan comprises:

- National Planning Framework 4 (NPF4) (2023);
- Highland Wide Local Development Plan (HwLDP) (2012);
- Inner Moray Firth Development Plan (IMFLDP) (2024); and
- West Highland and Islands Local Development Plan (WestPlan) (2019).

National Planning Framework 4

Formally adopted in February 2023, NPF4 forms part of the Development Plan alongside the HwLDP.

An important new feature legislated within Section 13 of the Planning (Scotland) Act 2019 is that Section 24 of the TCPA is now amended to state that in the event of any incompatibility between a provision of NPF4 and the provision of an LDP, then whichever of them is later will prevail. Although this application is not made under the TCPA, this is still relevant as a material consideration in framing the policy situation. In this instance, NPF4 is the more up to date part of the Development Plan.

NPF4 is clear and unequivocal about the need to act. It states that the global climate emergency has resulted in the need for reductions in greenhouse gas emissions and changes required to adapt to future impacts of climate change. NPF4 further states that while significant steps have been taken towards the decarbonisation of energy and land use, choices remain on how Scotland can sustainably utilise national assets. NPF4 provides clear policy and legislative support for renewables and specifically onshore wind energy as a principle, in order to reach our Net Zero obligations by 2045 as set out in law.

The inclusion of 'Strategic Renewable Electricity Generation and Transmission Infrastructure' as a 'national development' is highlighted within Annex B of NPF4. Its Statement of Need states that "*a large and rapid increase in electricity generation from renewable sources will be essential for Scotland to meet its Net Zero emissions targets*." Wind farms in excess of 50 Megawatts (MW) generating capacity comprise national development.

The Development exceeds this threshold and therefore be classed as a national development. Page 97 of NPF4 sets out that national developments are described as "*significant developments of national importance that will help to deliver the spatial strategy*". It adds that "*their designation means that the principle for development does not need to be agreed in later consenting processes*."

There is and remains a clear support at a national level for the further development of renewable and low carbon technologies however greater emphasis has been placed on the pace at which these technologies are rolled out. It is then appropriate to examine the policy content of NPF4.

Policy 1: Tackling the climate and nature crises acts as an overarching policy which in turn filters into each individual policy detailed within NPF4, stating that when considering all development proposals, significant weight should be given to the global climate and nature crises.

Policy 1 aims to address the global climate emergency and nature crisis by encouraging, promoting and facilitating development that is able to do this. Therefore, NPF4 introduces a key, prominent policy which states that the global climate emergency is a priority, and significant weight must be attached to this.

Policy 2: Climate change and mitigation provides encouragement and the means to facilitate development that minimises emissions and adapts to the current and future impacts of climate change. Policy 2 states:

a) Development proposals will be sited and designed to minimise lifecycle greenhouse gas emissions as far as possible.
b) Development proposals will be sited and designed to adapt to current and future risks from climate change.

Policy 3: Biodiversity states "*development proposals should contribute to the enhancement of biodiversity, including where relevant restoring degraded habitats and building and strengthening nature networks*", integrating "*nature-based solutions where possible*".

Importantly, the policy states under part b) that "*development proposals for national development…will only be supported where it can be demonstrated that the proposal will conserve, restore and enhance biodiversity, including nature networks, so that they are in a demonstrably better state than without intervention*". This includes a requirement to provide "*significant biodiversity enhancements in addition to any proposed mitigation*" which "*require to be secured within a reasonable timescale and with reasonable certainty*". Potential adverse effects need to be minimised through careful planning and design.

Policy 4: Natural Places of NPF4 reinforces the need for the protection, restoration and enhancement of natural assets. Part a) of this policy states that development proposals which would have an unacceptable impact upon the natural environment by virtue of type, location or scale will not be supported.

Criteria are provided for proposals that impact upon European or national designations, such as Special Areas Conservation ('SACs'), Special Protection Areas ('SPAs'), National Parks, National Scenic Areas ('NSAs'), Sites of Special Scientific Interest ('SSSIs') or Ramsar sites. Part d) discusses impacts upon local designations and states where a site is designated as a "local nature conservation site or landscape area in the LDP, it will only be supported where development will not have significant adverse effects on the integrity of the area and qualities for which it has been identified." Part ii) of d) states the second criteria for support, which is where "any significant adverse effects on the integrity of the area are clearly outweighed by social, environmental or economic benefits or at least local importance."

- Part e) states that the precautionary principle is to be applied.
- Part f) states that development proposals that are likely to have an adverse effect upon species protected by legislation will only be supported where it meets the statutory test.

Policy 5: Soils provides guidance on the protection of carbon-rich soils, the restoration of peatlands and the minimisation of disturbance to soils from development:
Development proposals on peatland, carbon-rich soils and priority peatland habitat will only be supported for:

- Essential infrastructure and there are a specific locational need and no other suitable site;
- The generation of energy from renewable sources that optimises the contribution of the area to greenhouse gas emission reductions targets;

- Small-scale development directly linked to a rural business, farm, or croft;
- Supporting a fragile community in a rural or island area; or
- Restoration of peatland habitats.
- A detailed site-specific assessment is required should the proposed development be located on peat deposits.

Policy 6: Forestry, Woodland, and Trees states under part c) that proposals involving woodland removal will "*only be supported where they achieve significant and clearly defined additional public benefits in accordance with relevant Scottish Government policy on woodland removal*". Development proposals will not be supported when they will result in any loss of ancient woodlands, ancient and veteran trees…or adverse impacts on native woodlands. As per part c), woodland removal would only be supported when "significant and clearly defined additional public benefits" are achieved.

Policy 7: Historic Assets and Places states within part a) that "*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*". Part h) requires that the development proposals affecting scheduled monuments will only be supported "*where i) direct impacts on the scheduled monument are avoided, ii) significant adverse effects on the integrity of the setting are avoided or 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*".

Part (o) states that non-designated historic environment assets, places and their setting should be protected and preserved in site wherever feasible. Should there be potential for non-designated buried archaeological remains, developers should provide an evaluation of this at an early stage.

The primary overarching policy for energy developments is **Policy 11: Energy**, which provides direction to "*encourage, promote, and facilitate all forms of renewable energy development onshore and offshore*"'

Policy 11 a) sets out that development proposals for all forms of renewable, low-carbon and zero emissions technologies will be supported, including onshore wind.

Policy 11 reiterates support for renewable and low carbon technologies, however there is a clear and direct reference to onshore wind farms, recognising this form of energy generation as a key component to achieving the outcomes of Policy 11 as well as wider overarching climate change policy and legislation which aim to expand renewable, low-carbon and zero emissions technologies at a national level.
While repowering, extensions and expansions are also supported, the creation of new onshore wind development must be supported to ensure there is a continued pipeline of new onshore wind farm schemes, such as the Development, which can be revisited for future repowering, extension, and expansion. In addition, the policy also includes support for battery storage.

Part (c) contains provision for the maximisation of net economic benefit and states that "*development proposals will only be supported where they maximise net economic impact, including local and community socio-economic benefits such as employment, associated business and supply chain opportunities*".

Policy 11 (e) provides further information on the topics which should be addressed as part of renewable, low-carbon and zero emissions technologies. It states that:
"In addition, project design and mitigation will demonstrate how the following impacts are addressed:

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

ii) significant landscape and visual impacts, recognising that such impacts are to be expected for some forms of renewable energy. Where impacts are localised and/ or appropriate design mitigation has been applied, they will generally be considered to be acceptable;

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

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

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

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

vii) impacts on historic environment;

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

ix) biodiversity including impacts on birds;

x) impacts on trees, woods, and forests;

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

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

xiii) cumulative impacts."

Policy 11 states that "*in considering these impacts, significant weight will be placed on the contribution of the proposal to renewable energy generation targets and on greenhouse gas emission targets*".

A fundamental part of Policy 11 is that Part e) ii) recognises that where some landscape and visual impacts are to be expected, localised impacts and/ or the application of appropriate design mitigation has been employed, then effects are considered to be acceptable.

Policy 14: Design, Quality and Place aims to ensure proposals are designed to "*improve the quality of an area whether in urban or rural locations and regardless of scale*".

Policy 25: Community Wealth Building states that "*development proposals which contribute to local or regional community wealth building strategies and are consistent*

with local economic priorities will be supported". This includes the use of local supply chains and local job creation, and supporting community led proposals.

Highland Wide Local Development Plan

The HWLDP was adopted in 2012, with the Onshore Wind Energy Supplementary Guidance (2016) and Part 2b (2017) also forming part of the Plan.

It is appropriate to examine the policy content of the HWLDP.

Policy 28: Sustainable Design states that '*The Council will support developments which promote and enhance the social, economic and environmental wellbeing of the people of Highland.'*. The Policy sets out what criteria proposed developments will be assessed against and where environmental and/or socio-economic impacts of a proposed development are likely to be significant, the Council will require the preparation of appropriate impact assessments.

Developments that will have significant adverse effects will only be supported if no reasonable alternatives exist, if there is demonstrable over-riding strategic benefit or if satisfactory overall mitigating measures are incorporated.

Policy 30: Physical Constraints refers to the Physical Constraints: Supplementary Guidance, which addresses physical constraints in the Highlands and aims to ensure that proposed development does *'not adversely effect human health and safety or pose a risk to safeguard sites.'*. Developers must consider whether their development is located in an area of constraint and demonstrate either compatibility or proposed mitigation relevant to the constraint.

Policy 31 Developer Contributions confirms that the Council will seek a '*fair and reasonable contribution'* for development proposals that create a need for new or improved public services, facilities or infrastructure.

Policy 36: Development in the Wider Countryside sets out how development proposals will be assessed for the extent to which they:

- '*are acceptable in terms of siting and design;*
- *are sympathetic to existing patterns of development in the area;*
- *are compatible with landscape character and capacity;*
- *avoid incremental expansion of one particular development type within a landscape whose distinct character relies on an intrinsic mix/distribution of a range of characteristics;*
- *avoid, where possible, the loss of locally important croft land; and*
- *would address drainage constraints and can otherwise be adequately serviced, particularly in terms of foul drainage, road access and water supply, without involving undue public expenditure or infrastructure that would be out of keeping with the rural character of the area*.'

The Policy notes that renewable energy developments proposals will be assessed against the Renewable Energy Policies, the non statutory Highland Renewable Energy Strategy and where appropriate, Onshore Wind Energy: Supplementary Guidance. All proposals should still accord with the other general policies of the plan.

Policy 51: Trees and Development sets the Council's requirements for tree/hedge planting and protection. Development will be supported where it promotes the protection of existing hedges, trees and woodlands and the '*acceptable developable area of a site is influenced by tree impact, and adequate separation distances will be required between established trees and any new development.'*. The Policy references the requirement for a woodland management plan, where appropriate and to the Council's Trees, Woodland and Development Supplementary Guidance.

Additional planting within a tree planting or landscape plan will be required, to compensate for removal and to enhance any new development.

Policy 52: Principle of Development in Woodland confirms that the Council will seek to protect woodland resources and that development proposals must demonstrate a need for development and that the woodland site has capacity. All proposals will be assessed against the Scottish Government's Policy on Control of Woodland Removal, and the Highland Forest and Woodland Strategy will also be considered.

Policy 55: Peats and Soils sets out the Council's requirement to avoid unnecessary '*disturbance, degradation or erosion of peat and soils.',* including where the extraction of peat may effect the integrity of Natura site containing areas of peatland.

The unacceptable disturbance of peat will not be permitted unless it is demonstrated that the disturbance effects '…*are clearly outweighed by social, environmental or economic benefits arising from the development proposal.'*. A peatland management plan may be required by the Council.

Policy 57: Natural Built and Cultural Heritage identifies the criteria against which development proposals will be considered in terms of their effect on any heritage features and setting.

Policy 58: Protected Species provides information on the Council's requirements for protected species, including surveys, mitigation plans and how development proposals that are likely to have adverse effects will be considered.

Policy 59: Other Important Species sets out requirements relating to the presence of and any adverse effects of development proposals, either individually and/or cumulatively, on the Other Important Species listed below:

- Species listed in Annexes II and V of the EC Habitats Directive;
- Priority species listed in the UK and Local Biodiversity Action Plans;
- Species included on the Scottish Biodiversity List

Policy 60: Other Important Habitats and Article 10 Features outlines how the Council aim to safeguard the integrity of features of the landscape which are of major importance because of their linear and continuous structure or combination as habitat "stepping stones" for the movement of wild fauna and flora (Article 10 features).

The Council will have regard to the value of the following Other Important Habitats:

- Habitats listed in Annex I of the EC Habitats Directive;
- Habitats of priority and protected bird species (see Glossary); Priority habitats listed in the UK and Local Biodiversity Action Plans;
- Habitats included on the Scottish Biodiversity List.

The Council will use conditions and agreements to ensure that significant harm to Article 10 Features and Other Important Habitats is avoided. Where it is judged that the reasons in favour of a development clearly outweigh the desirability of retaining those important habitats, the Council will seek to put in place satisfactory mitigation measures, including where appropriate consideration of compensatory habitat creation.

Policy 61: Landscape notes that the Council will take account of Landscape Character Assessments, Landscape Capacity Studies and its supplementary guidance on Siting and Design and Sustainable Design, together with any other relevant design guidance in the assessment of development proposals.

New development proposals should be designed to reflect the landscape characteristics and qualities identified in the Landscape Character Assessment. Where possible development proposals should also seek to enhance the characteristics of an area, in particular in areas where there has been a loss of landscape quality or sense of place.

Development proposals shall consider *'… appropriate scale, form, pattern and construction materials, as well as the potential cumulative effect of developments where this may be an issue.'*.

Policy 63: Water Environment outlines that the Council will support development proposals that do not compromise the objective of the Water Framework Directive (2000/60/EC)('WFD'). The Council also take account of the River Basin Management Plan for the Scotland River Basin District, the associated Area Management Plans and relevant supporting information in assessing development proposals.

Policy 64: Flooding sets out that development proposals should avoid areas susceptible to flooding and where they are within or border medium to high flood risk areas, they will need to demonstrate compliance with Scottish Planning Policy in the form of a Flood Risk Assessment ('FRA'). An FRA may also be required for areas outside of medium to high flood risk areas where:

- better local flood risk information is available and suggests a higher risk;
- a sensitive land use (as specified in the risk framework of Scottish Planning Policy) is proposed, and/or;

- the development borders the coast and therefore may be at risk from climate change.

Development proposals within a flood plain should not compromise the WFD.

Where flood management measures are required, natural methods should be incorporated, or adequate justification should be provided as to why they are impracticable.

Policy 65 Wastewater Treatment addresses the requirement for connections to the public sewer system and that any private system would discharge to land rather than water.

Policy 66 Surface Water Drainage addresses surface water drainage requirements. All proposed development must be drained by Sustainable Drainage Systems ('SuDS') designed in accordance with The SuDS Manual (CIRIA C697), where appropriate, the Sewers for Scotland Manual 2nd Edition and adhere to Planning Advice Note 69: Planning and Building Standards Advice on Flooding (paragraphs 23 and 24). Each drainage scheme design must be accompanied by particulars of proposals for ensuring long-term maintenance of the scheme**.**

Policy 67: Renewable Energy Developments refers to how the Council will consider renewable energy development proposals. The proposal should be well related to the source of the primary renewable resources that are needed for their operation. The Council will also consider:

- The contribution of the proposed development towards meeting renewable energy generation targets;
- Any positive or negative effects it is likely to have on the local and national economy;
- Other policies of the development plan and the Highland Renewable Energy Strategy and Planning Guidelines; and
- The development proposal's ability to demonstrate significant benefits including by making effective use of existing and proposed infrastructure or facilities.

'*The Council will support proposals where it is satisfied that they are located, sited and designed such that they will not be significantly detrimental overall, either individually or cumulatively with other developments*….' and '*Proposals for the extension of existing renewable energy facilities will be assessed against the same criteria and material considerations as apply to proposals for new facilities*.'

The Policy makes reference to the Onshore Wind Energy Supplementary Guidance which will replace parts of the Highland Renewable Energy Strategy. This Guidance informs Developers of key constraints applicable to renewable energy developments and sets out information required for the assessment of these proposals and which shall be submitted as part of the planning application.

Policy 69: Electricity Transmission Infrastructure accounts for overground, underground or sub-sea electricity transmission infrastructure (including lines and

cables, pylons/ poles and vaults, transformers, switches and other plant). The policy recognises their strategic significance and will support proposals which are assessed '.. *as not having an unacceptable significant impact on the environment..*'. In sensitive locations, mitigation may be required to help address any concerns.

Policy 72: Pollution outlines that the Council will only approve development proposals that submit a detailed assessment where that proposal may result in pollution such as noise, air, water and light.

Major Developments and developments that are subject of Environmental Impact Assessment will be expected to follow a robust project environmental management process, following the approach set out in the Council's Guidance Note "Construction Environmental Management Process for Large Scale Projects" or a similar approach.

Policy 77 Public Access sets out requirements where development proposals affect a route included in the Core Paths Plan, an access point to water, or wider access rights. The Council will require that the existing path or access is retained whilst maintaining or enhancing its amenity value. If this cannot be achieved, an alternative access provision that is no less attractive must be provided. An Access Plan must be provided with Major Developments.

Inner Moray Firth Local Development Plan 2

The aim of the IMFLDP 2 is to set out where development should and should not occur over the next 10-20 years and supports the HwLDP and NPF4 in guiding future development in the Inner Moray Firth area.

It is relevant to consider Policy from this Plan.

Policy 1 Low and Zero Carbon Development outlines that each new build development must minimise carbon emissions. A 'Low and Zero Carbon Development Section' must be provided with the planning application. The Policy goes on to set out a number of requirements for this assessment and also addresses requirements for proposals with space heating needs located in Heat Network Zones.

Policy 2 Nature Protection, Restoration and Enhancement states that '*All developments must enhance biodiversity, including, where relevant, restoring degraded habitats and building and strengthening nature networks and the connections between them. Any potential adverse impacts of development proposals on biodiversity, nature networks and the natural environment must be minimised through careful planning and design and following the mitigation hierarchy*.' All national, major and EIA development will only be supported where it demonstrates that the proposal will conserve and enhance biodiversity. Any biodiversity enhancements will require to be delivered within an agreed timeframe, and submissions should account for future monitoring and management requirements.

Policy 9 Delivering Development and Infrastructure outlines that the Council will assess each development proposal in terms of its impact on each relevant

infrastructure network and community facility capacity. Developers will be required to demonstrate that adequate capacity to serve each proposal exists or can be created via a programmed improvement and/or by direct developer provision or funding.

Policy 14 Transport outlines that development proposals should demonstrate how they can maximise walking, wheeling, cycling and public transport as alternative travel options (to use of the private car) for people using the development. A proportionate assessment should be included as part of the Transport Assessment or Statement, where one is required.

West Highland and Islands Local Development Plan

The WestPlan was adopted in 2019 and focuses on development in the West Highlands over the next 20 years.

This Plan is focused primarily on regional and settlement strategies and is relevant in terms of informing future plans for community engagement and/or community benefit.

Planning Assessment

Introduction

Following identification of the relevant planning policies, guidance and other material considerations, this section examines how the Development should be assessed against material considerations, including the Development Plan.

The Principle of the Development

As introduced in prior sections of this Planning Statement, there is a significant and consistent body of international, UK and Scottish energy policy which clearly and unambiguously tells a prolonged message that climate change must be tackled imminently, that electricity demand will continue to increase substantially with societal decarbonisation, and that renewables must play a key role in this transition. The climate emergency declared by the Scottish Government in 2019 has not dampened, and achieving Net Zero is a legal requirement at both UK and Scottish Government Levels.

At a UK policy level there is a consistent thread that more needs to be done. The Climate Change Committee report to UK Government in 2025 assessed that the UK Government's interim 2030 target of 68% of 1990 levels is within reach *'…provided the Government stays the course.'* The report also determined that '*Progress to date has been primarily driven by decarbonisation of the electricity system, with renewables replacing both coal and, increasingly, gas.'*

The Clean Power 2030 Action Plan sets out the need to generate enough clean power to meet to UK's total annual electricity demand whilst increasing energy security. The highlighted gap of between 8.4GW and 10.4GW to achieve the Clean Power capacity range of between 27 and 29GW of onshore energy by 2030 means that a considerable amount of this will have to be generated in Scotland.

The Scottish Government are also clear that the aspirational additional capacity required in Scotland is a minimum. The aforementioned targets in the 2022 OWPS of reaching 20GW installed capacity in 2030 may not be met. In any event, the requirement for clean electricity clearly does not stop at 2030. The OWPS states that deployment of onshore wind is "*mission critical for meeting our climate targets" as an "affordable and reliable source of electricity generation*."

With regard to planning policies and the status of renewable energy within Scotland, the Development benefits from national development status as per National Development 3 "*Strategic Renewable Electricity Generation and Transmission Infrastructure*" of NPF4, by virtue of being an electricity generating station of over 50MW. The Development is hence of national importance for the delivery of the national Spatial Strategy set out within NPF4. This Spatial Strategy, as previously discussed within this document, sets out that we must make significant progress and that a large and rapid increase in electricity generation from renewable sources will be essential for Scotland to meet its zero emissions targets.

The principle of the Development in International, UK and Scottish energy policy terms, and also Scottish planning policy terms is unequivocal and therefore under a Section 36 application where Section 25 of the TCPA does not prevail, enjoys significant weight in the balance of determining factors.

The Development Plan is however a material consideration, and the Development Plan is clear that proposed developments require to be assessed in relation to their site specific effects. It is therefore pertinent to assess the acceptability of the Development with regard to the level of compliance with Development Plan policies, using the evidence prepared within the accompanying EIAR.

The Acceptability of the Development

Landscape and Visual

Landscape and visual impacts are a key focus of any wind energy development and throughout the design evolution and assessment process, potential impacts have been considered as discussed within the Design and Access Statement ('DAS') which accompanies this application, along with the discussion of design evolution within Chapter 3 of the EIAR.

The key policies are Policy 4 and Policy 11 of NPF4, along with policies 28, 30,36, 57, 61,67,69 and 72 of the HwLDP which are set out in the preceding section. An overarching facet of NPF4 Policy 11 which has been cited regularly in post-NPF4

decision making is that *"significant landscape and visual impacts are to be recognised and expected for some forms of renewable energy*", and in turn "*where impacts are localised and/or appropriate design mitigation has been applied, they will generally be considered to be acceptable*". This has been fundamental to the decision making of Scottish Ministers since the publication of NPF4.

There are considerations to address several matters in respect of landscape and visual policy compliance, namely siting, incremental expansion, designated sites, landscape effects, visual effects and cumulative effects.

Siting and Design

As stated within Chapter 3 of the EIAR, the siting of the Development has been subject to lengthy technical and feasibility studies and the fundamental principle of design is that the proposed development harnesses the power of the wind but must also take into account the environmental effects of a wind farm and result in a balance between viable wind yield and an acceptable level of adverse environmental effects. This is particularly relevant in landscape and visual terms for the most visible components, i.e. the turbines. It is also relevant to varying degrees for ancillary infrastructure required to facilitate the proposed development.

Section 5.6.2 of Chapter 5 of the EIAR sets out embedded mitigation measures used within the design in order to restrict or limit the extent and magnitude of significant effects. The design has sought to do the following:

- Reducing the extent of turbines in the western part of the Site to set turbines further back beyond the nearby hill slopes seen from the open stretch of the A87 to the west;
- Seeking to avoid, as far as practicable, turbines being placed on more prominent sections of the hillside that protrude from the smoother slopes;
- Seeking to avoid, as far as practicable, turbine bases being seen lower down on the hill's slopes seen in views from the south, albeit this aim had to be balanced against the above two aims;
- The use of aviation lights which reduce to 200 candela (from 2000 candela) in good visibility conditions (more than 5 km), a standard form of mitigation that is permitted without additional Civil Aviation Authority ('CAA') approval; and
- A reduced aviation lighting scheme has also been proposed for agreement with the CAA, to minimise the number of lights required to nine nacelle lights and no mid-tower lights. At the time of writing this had not been agreed so the assessment of aviation lighting in section 5.7.6 assumes all turbines would be lit. However, it is considered that this worst-case scenario is unlikely to be the outcome of discussions with the CAA.

Figure 5.1 provides a bare ground Zone of Theoretical Visibility ('ZTV') study for a radius of 45 km from the proposed turbines. This figure indicates that visibility of the Development would largely be confined to remote upland areas with visibility from the surrounding valleys, where areas of settlement and the main transport routes are

located, would be much more limited. Figure 5.2 shows a ZTV study including OS mapped woodlands (modelled at 15 m high) and buildings (modelled at 7 m high) which illustrates that the extensive vegetation cover within the valleys would further reduce the extent of visibility in reality, with the most notable areas of valley visibility arising from the closest parts of Glen Garry and Glen Loyne, within 5 km. It also illustrates that areas of upland visibility are frequently within or located close to existing and consented wind farms, except to the south-west. Figure 5.10 shows a cumulative ZTV study with existing and consented wind farms. This figure indicates that there would be virtually no areas where the Development would be seen in isolation, without other operational and consented wind farms also being visible.

The ZTV and viewpoint analysis for the Development noted that, beyond 10 km, the Development would not be seen as distinct from or notably alter the existing pattern of wind energy development in the area. Any large scale changes to views would only occur at close proximity to the Site, with medium and small scale changes extending up to approximately 10km, where the Development becomes an increasingly minor addition to the adjacent wind farms.

Designated Areas

As demonstrated within Figure 5.2 of the EIAR, there would be very limited visibility of the Development from the designated landscapes within the study area, most of which are at distances of greater than 10 km, and no significant effects on designated areas have been identified.

Loch Lochy and the Loch Oich Special Landscape Area ('SLA') are located approximately 6km to the south east of the Development. The Development would be seen from some, but not all, hill summits and more elevated facing slopes but would not be visible from the lower lying areas in the base of the glen. Any effects were determined to be Minor.

Where visible, the turbines would be seen in the context of existing and consented wind farms, making a very limited change to the existing pattern of development. The only notable effects on special qualities would be changes to views from some hill summits to the north of Loch Lochy, although the turbines would not be seen in the more important views looking along or across the Great Glen from these summits.

The Moidart, Morar and Glen Shiel SLA is located approximately 4.8km to the north west of the Development. Any changes to views would be limited and would have no impact on the '*distinctive west highland composition'* for which this area is designated. Any effects were determined to be range from Small/negligible to Negligible.

Any effects on designated areas beyond 10 km would experience Negligible effects. As noted above beyond 10 km, the Development would not be seen as distinct from or notably alter the existing pattern of wind energy development in the area.

Policy 61 and 67 of HwLDP seek to minimise landscape character and visual impacts and where there is landscape change within SLA's that this '*relates to the key characteristics and special qualities of the designated areas.'*

The EIAR concludes that there will be no significant effects on Designated Areas and there will be limited visibility of the Development from these sites. Therefore, it is determined that key characteristics and special qualities of the Designated Areas will be maintained and there will be no significant landscape or visual effects on the Sites or their overall integrity.

Landscape and Visual Effects

The Development would form a relatively modest extension of the existing Beinneun/Millennium wind farm cluster. In establishing the baseline for the assessment, operational developments (Beinneun and Extension, Millennium, Stronelairg, Bhlaraidh and Corrimony) and consented wind farms (Bunloinn, Tomchrasky, Bhlaraidh Extension and Cloiche) were considered as part of the baseline environment.

Chapter 5 of the EIAR concludes that there would be no significant effects on the landscape character within the two host character types. The Development would be partly situated within landscape character type ('LCT') 237 Rocky Moorland – Lochaber. There would be extensive visibility from the open upper slopes above the forestry and a sense of being closer to the turbines than the existing wind farms within 5 km. The significance of effects would be Moderate/minor and Adverse.

Part of the Development would also be situated within LCT 220 Rugged Massif – Inverness, sitting along the southern edge. This area is currently characterised by the presence of the existing Beinneun and Millennium wind farms. The addition of further turbines in this area would not notably alter this characteristic. Across the wider host unit of this LCT. The effects of the Development on the landscape character of this LCT would be Negligible.

LCT235 Broad Forested Strath is located 0.7km to the South. On the northern valley sides, there would be some locations, where there would be a strong sense of proximity to the turbines and none of the operational wind farms are currently visible. There would be Large/medium scale changes to character in this Limited extent of the LCT and effects overall would be Moderate/minor and Adverse.

Other LCTs out to and beyond 10km from the Development would experience Negligible effects.

Significant visual effects will be experienced by road users heading towards to the Great Glen on the A87. Views of the closest turbines would be experienced, particularly as the road users turn north, passing along the west of the Site. At Viewpoint 2 proposed turbines would also be seen alongside existing operational turbines. These visual effects were determined to Major/moderate and Adverse. All other visual effects were considered to be not significant.

In terms of the visual effects of nighttime lighting, the aviation lighting on the turbines would consist of steady red lights mounted on the top of the nacelles of all turbines. The turbines would also be fitted with low intensity steady red lights at the midpoint of the tower, with typically three lights fitted around the circumference to ensure visibility from all directions. The EIAR describes effects at parts of Glen Garry and on stretches of the A87. However, it was determined that there would be no significant night-time effects from lighting. Night time lighting visibility is likely to be substantially less than those assessed in Chapter 5 of the EIAR as a result of the aviation lighting proposal that is currently with the CAA for consideration.

Cumulative Effects

Policy 61 of the HwLDP notes the need to consider the potential cumulative effects of developments where this might be an issue. Chapter 5 of the EIAR describes how cumulative assessment scenarios were identified and assessed.

The assessment scenario considered the Development, operational and consented development and the Culachy Wind Farm (which is in planning). The assessment concluded that the effects from this cumulative scenario, would not result in changes to the effects recorded in the main assessment.

In areas of combined visibility that are closer to the Culachy Wind Farm, changes arising from the Development would be Negligible. For users of the Scottish National Trail, they gain close proximity to the Culahy Wind Farm near the Corrieyairack Pass. At this location the Development is a distant feature and result in Negligible changes to views. In the hills to the north of Laggan Locks, the Development would be seen as part of the existing Beinneun/Millennium cluster and the presence of the Culachy Wind Farm would not result in any change to the effects recorded in the main assessment.

At night, the Culachy Wind Farm would not be visible from the parts of Glen Garry or stretches of the A87 that would be affected by the proposed aviation lighting of the Development.

Enhancement Measures

No specific landscape enhancement measures are proposed, but changes to improve habitats will provide incidental improvements in the condition of the landscape fabric of the site. A number of additional mitigation compensation and significant enhancement measures are proposed as part of an Outline Habitat Management Plan (OHMP) which is provided in the EIAR in Technical Appendix (TA) A6.6. Habitat measures included within the OHMP include:

- Blanket bog restoration measures to offset predicted losses. The area to be restored (~131ha) is set to achieve offsetting (i.e. compensation rather than biodiversity enhancement) in the order of 1:10 (lost restored), as per Nature Scot (2023) guidance; and

- Habitat enhancement measures which include Cleuch woodland (~9.7ha) planting and low density broadleaved woodland (~133ha) planting to offset temporary and permanent loss of non-mire habitats.

A final and detailed HMP will be submitted to and approved by Highland Council and NatureScot in advance of construction.

Accordingly, the Development is not in conflict with policies 4 and 11 of NPF4 and also has no conflict with policy 61 of HwLDP.

Ecology and Ornithology

In terms of terrestrial ecology, the environmental assessment is contained within Chapter 6 of the EIAR and associated appendices.

Through sensitive design of the Development and commitment to best practice measures during construction, all potential effects on the conservation status of ecological receptors were assessed as not significant.

As detailed earlier, the delivery of the HMP would reduce adverse effects on habitats. The HMP will include provisions for the protection, maintenance, restoration and/or enhancement of bog habitats locally. Furthermore, the HMP would deliver peatland restoration of an area over approximately 131ha and this equates to approximately 9 times larger than the area of potential direct and indirect loss (14.4ha). Woodland planting is provided, which includes low density broadleaf woodland planting on the lower slopes towards Loch Loyne, around the site access point and upslope of the A87 and broadleaf woodland planting in the cleuchs on the south side of the site. This proposed woodland planting incorporates an area of approximately 141ha.

The Plan also includes measures for woodland planting and monitoring proposals for birds, bats, badger, pine marten, otter, water voles, reptiles and deer.

Trees and Woodland

There is a single area of ancient woodland partially within the Site. No woodland removal or fragmentation will occur to any ancient woodland site as a result of the Development. With standard mitigation in place, no pollution effects are anticipated. Effects on ancient woodland were considered to be negligible (not significant). Similarly coniferous plantation woodland and native broadleaf woodland will not be subject to significant ecological effects by the Development.

Ornithology

Ornithological matters are set out and assessed within Chapter 12 of the EIAR. The assessment identifies Golden Eagle, White-tailed Eagle, Osprey, Red-Throated Diver, Black-throated Diver, Common Scoter, Greenshank, Golden Plover and Black Grouse alongside the West Inverness-shire Lochs Special Protected Area (‘SPA’) and West Inverness-shire Lochs SSSI as ornithological features of interest.

A Collision Risk Model ('CRM') was completed for White-tailed Eagle, Golden Eagle, Common Snipe, Golden Plover, Osprey and Greenshank. Overall, it was considered that the integrity of designated sites and the conservation status of the six species will remain unaffected by the Development and that there will be no significant negative cumulative collision risk effects with other developments both during operation and decommissioning.

In terms of disturbance, predicted effects were identified on the West Inverness-shire Lochs SPA and Common Scoter during the construction and decommissioning phases. However, specific safeguarding measures were identified to minimise potential impacts, and these are included as part of a Bird Protection Plan (BPP) and Common Scoter Protection Plan. With the adoption of these measures, there will be no significant adverse effects associated with disturbance.

The BPP also incorporates enhancement measures which are provided in the Habitats Management Plan (low density broadleaf woodland across c. 133 ha to benefit black grouse). Together, with a commitment to best practice measures during construction and decommissioning, all potential effects on the conservation status of the ornithological receptors were assessed to be not significant.

Accordingly, the Development is not in conflict with the policies of the HwLDP, NPF4, or IMLDP 2.

Hydrology and Peat

Potential impacts upon hydrology, hydrogeology and peat are set out within Chapter 12 of the EIAR. The assessment finds that the potential effects on hydrology and hydrogeology (including peat) are not significant.

Accordingly, the Development is not in conflict with the policies of the HwLDP, NPF4, or IMLDP 2.

Drainage

A Construction Environmental Management Plan ('CEMP') will be developed in advance of the construction phase, which will accord with the Outline CEMP provided as EIAR Technical Appendix A4.1. This sets out drainage features that will be effective in minimising effects on surface and groundwater during and after construction.

An Operation Environmental Management Plan ('OEMP') will be developed in advance of the operation phase. This will provide detail on the retained drainage and new drainage design for the Development, soft engineering and measures proposed to reduce surface water run-off rates from areas of hardstanding. This is anticipated to be secured by planning condition.

The BESS and substation compounds will have a SuDS designed to a 0.5 % AEP plus 42 % climate change event to manage runoff generated from the compound. This is

also expected to be secured through a planning condition requiring the detailed design to be submitted and approved by THC prior to construction.

Accordingly, the Development is not in conflict with the policies of the HwLDP, NPF4, or IMLDP 2.

Peat

A Peat Landslide Hazard and Risk Assessment is provided in Technical Appendix A12.2 reporting depths of mostly below 0.5m. Technical Appendix A12.2 provides guidance and assessment of how any peat found on site would be treated, which would form the basis of a Peat Management Plan to be developed prior to commencement of construction. Peat has been recorded across the site with some localised areas where intermittent confined pockets of deeper peat were recorded within proximity (<150m) of proposed elements of the development. Whilst the survey at a majority of the turbine positions encountered peat within the proposed laydown / foundation areas, it is generally present in small intermittent patches and not connected. Similarly, a thin layer of peat has been encountered within each section of the track with an intermittent distribution.

The overall pre-mitigation Peat Landslide Risk for the turbine locations, access track, BESS, and Met Mast is generally classified as medium (with a smaller number being classed as low or low / medium). This was considered a conservative assessment based on the presence pockets of intermittent peat and deeper peat which are not continuous.

With mitigation as set out within Section 4 of the Technical Appendix, which generally comprises the removal of peat during construction normal to wind farm developments, all post-mitigation Peat Landslide Risk were reduced and assessed as low.

A Construction Peat Management Plan shall be developed. The Plan will be based on SEPA's good practice guidelines, and its main objective is to outline how peat will be excavated and managed to maximise the potential for re-use and reinstatement. Guidance to be included in this is set out in section 4.2 of the Technical Appendix.

Accordingly, the Development is not in conflict with the policies of the HwLDP, NPF4, or IMLDP 2.

Wastewater

The Development does not require a sewer connection.

Flooding

In terms of flood risk, the risk from fluvial, tidal, groundwater, reservoir/artificial and sewer/drainage sources was scoped out of the assessment and did not require detailed assessment. Surface water flood risk associated with a number of small

watercourses will be managed with embedded control measures set out in the OCEMP and in the SuDS for the BESS and adjacent substation.

Accordingly, the Development is not in conflict with the policies of the HwLDP, NPF4, or IMLDP 2.

Cultural Heritage

Potential impacts upon cultural heritage receptors and archaeology are set out within Chapter 8 of the EIAR. The assessment finds no significant effects during operation upon cultural heritage receptors (including the setting of Listed Buildings).

Greenfield Farm is a Category C listed barn located at Greenfield which lies c. 3.5 km south of the Site. It is of late 18th century date and is a rubble based structure with a later corrugated iron roof.

Viewpoint 15 produced for the Chapter 5 LVIA has been taken from land to the west of the Listed Building and provides an indication of likely visibility of the Development from the asset. The viewpoint shows that the existing wind farms (Beinneun and Millenium) are visible from Greenfield and that the addition of the Development would lead to further turbines being visible in this view. Whilst it is assumed that the turbines would be visible from the Listed Building, this visibility is incidental. The barn was not built with the intentionality of wide ranging northern views; instead, it was purposely constructed as an agricultural building serving the farm. It is the farm complex and its surrounding agricultural setting that contributes to the cultural significance of the Listed Building and as such the Development will therefore not result in any significant effects on the setting.

There are no known heritage assets within the Site.
The assessment considered the potential for effects on as yet unknown heritage assets. The potential for as yet unknown buried archaeological remains to be encountered within the Site was considered to be low. With the implementation of archaeological mitigation, there would be no significant effects.

Any future requirement for archaeological monitoring would be discussed post-consent and would be set out in a Written Scheme of Investigation, to be conditioned in the event of consent.

Given the lack of direct or indirect effects, Policy 7 of NPF4 does not require to be tested as the Development presents no conflict with it. The site design and siting has avoided significant effects and therefore is in accordance with Policy 11 of NPF4, and also has no conflict with 28,30,57, 67 and 69 of HwLDP.

Noise

Potential effects related to noise emissions are assessed within Chapter 9 of the EIAR. The minimum distance between any Development infrastructure and the closest noise receptor is over 1.9 km. At this distance, construction noise effects will not be

significant, as agreed with the Council. Rather than assessing the effects of construction noise in terms of noise level, the best practice mitigation measures outlined in Chapter 9 are to be adopted, as advocated in BSI 'Code of practice for noise and vibration control on construction and open sites' BS 5228-1:2009+A1:2014 ('BS 5228').

Noise produced during decommissioning of the Development is likely to be of a similar nature to that during construction, although the duration of decommissioning will be shorter than that of construction. Any legislation, guidance or good practice relevant at the time of decommissioning would be complied with. On this basis, effects of decommissioning noise are assessed as being no worse than the effects of noise during construction.

Given the large separation distances to the closest receptors, no significant vibration effects are anticipated. Construction traffic would lead to a predicted change in the level of road traffic noise during construction of the Development of less than 3 dB in all cases, with no more than a minor magnitude of impact. With specific regard to the A887, the baseline daily traffic flow was found to be less than 1,000 vehicles in total. Therefore, and as described in Section 9.3.10.1, noise levels for the A887 have been calculated in accordance with BS 5228. As shown in Appendix A9.2, a construction traffic noise level of 50.4 dB was calculated for dwellings along the A887; this is below the daytime threshold of 65 dB, LAeq, and is therefore acceptable.

In terms of operational noise effects, conclusions depend on whether one particular property becomes financially involved in the Development or not. If it does, no exceedances of noise limits are anticipated. If it does not, in the absence of mitigation, there was deemed to be minor exceedances upon one property at between 6 and 7m/s during the daytime. The noise assessment then confirms that with appropriate mitigation under certain wind speeds and directions, the Development would comply with the requirements of ETSU-R-97 Guidance and the GPG at all properties, both in isolation and cumulatively. Subject to this appropriate mitigation, the effect of operational noise is therefore not significant.

The cumulative effects of the Development in conjunction with any nearby wind energy developments either operational, consented or the subject of a current planning application were taken into consideration in the above operational assessment. The following cumulative developments were identified:

- Beinneun – operational;
- Beinneun Extension – operational;
- Bunnloin – consented;
- Millennium (including extension) – operational; and
- Tomchrasky – consented.

Accordingly, the Development is not in conflict with the policies of the HwLDP, NPF4, or IMLDP 2.

Traffic and Transport

Policy 11(e)(vi) of NPF4 requires that impacts on road traffic and adjacent trunk roads during construction are considered and addressed. Similarly, Policies 28,69,67 and 72 of the HwLDP requires the Development to avoid or address any significant impact arising upon the environment.
Chapter 11 of the EIA Report sets out the assessment of effects on traffic and transport.

The Kyle of Lochalsh has been identified as the most suitable port of entry for blade components and either Kyle of Lochalsh or Corpach (to the south of the Site) for the tower components. This is due to physical constraints at Kyle of Lochalsh. The movement of abnormal loads is not anticipated to exceed 13 trips per week over the course of five months (with no overlap during the busiest construction months). An Abnormal Loads Assessment complete with swept path plans for pinch points along both routes, to the Site access point has been undertaken.

The construction programme associated with the Development is anticipated to cover an 18-month period. The traffic and transport assessment considered a worst-case month during the construction programme.

Significant effects of the Development represent a conservative traffic approach, where 100% stone requirements were imported to the Site. These represent over 70% of the Heavy Good Vehicle ('HGV') movements during the construction phase. This would be avoided if the stone is instead sourced from the on-site borrow pits as proposed, as is expected.

Additionally, the high percentage increases in HGV volumes are mainly attributable to the low baseline levels of HGV traffic on the traffic routes. Furthermore, increased traffic levels are temporary in nature and are likely to be lower during the other construction months, with a significant decrease in construction traffic from Month 12 to 18 (completion).

A Construction Traffic Management Plan ('CTMP') will include measures to reduce traffic effects and will be conditioned as part of any consent. Owing to that, significant effects are not predicted.

Therefore, it is considered that the Development is in compliance with the Development Plan in this regard.

Socio Economic

Chapter 14 of the EIA Report sets out effects on socio-economic, tourism and recreational receptors and finds that there are no significant effects in an EIA context, although there would be beneficial impacts in terms of induced effects related to the construction phase and the establishment of a community benefit fund.

Accordingly, the Development is not in conflict with the policies of the HwLDP, NPF4, or IMLDP 2.

Recreational Routes & Tourism

The construction phase will have no direct effects on recreational routes including Core Paths, non-designated routes and the Mandally – Poulary section of the Scottish National Trail, as they are located outwith the Site. Any indirect effects during the operational phase on the recreational amenity of routes were determined to be not significant and for the majority of routes, there would be no visibility of the turbines.

In terms of tourism, there is one receptor within the site, Deer stalking. Once operational, this would continue, albeit avoiding the turbines and above ground infrastructure. Indirect effects, such as construction traffic and visual, on tourism receptors located offsite are also limited and negligible. Overall, the effects on tourism during all phases of the Development were determined to be not significant.

Accordingly, the Development is not in conflict with the policies of the HwLDP, NPF4, or IMLDP 2.

Community Benefit

Within NPF4, Policy 11c specifically states that "*Development proposals will only be supported where they maximise net economic impact, including local and community socio-economic benefits such as employment, associated business and supply chain opportunities*".

The adjacent operational Beinneun Wind Farm supports projects that benefit residents of the local community council areas, where an annual payment of approximately £500,000 is available for the operational life of the wind farm. The fund has supported a number of organisations such as the Glengarry Shinty Club, the Fort Augustus and Glenmoriston Community Company, and Glengarry Community Woodlands.

A community benefit package will be set up for the Development. With this funding, projects brought forward by the local community could provide positive benefits to the local economy, local facilities, and the general quality of life for local residents. Although the full details of the Development's community benefit package is not confirmed at this stage, it is likely to follow a similar structure to the existing Beinneun Wind Farm fund.

In addition to the above, the Developer is also exploring opportunities for local investment in the Development, where the local communities would be given the opportunity to invest in the project, enabling them to receive a share of profits.

Accordingly, the Development is not in conflict with Policy 28,30,67, 69 and 72 of HwLDP, nor Policy 11 of NPF4.

Conclusions

This document aims to demonstrates the clear and unequivocal support for onshore wind energy that remains very strong within International, UK and Scottish legislation and planning policy.

The Scottish Government are very clear about the continued need for onshore wind, with a target of 20GW before 2030, and a UK target of an additional between 8.4GW and 10.4GW to achieve the Clean Power capacity range of between 27 and 29GW of onshore energy by 2030. Scotland has a legally binding obligation to achieve Net Zero by 2045. Both documents are very clear that 2030 is not the cut off and more must be done after this date. The Scottish Government makes it abundantly clear that there is a climate emergency, and the principle of wind energy is not in doubt via the national development status of all generation from renewables above 50 MW. There is a wide range of policy as set out within this Planning Statement that sets out the urgency upon which deployment must happen to keep up with national and international emissions targets and constantly increasing demand for electricity.

The Development draws immediate support from its status as a national development. With the use of appropriate design and siting as set out within this document, the Design and Access Statement and the EIAR, the Development has mitigated significant effects as far as practicable.

The location of the Development in a relatively isolated and low-lying area, combined with the existing wind farm development in this landscape results in the environmental effects (particularly landscape and heritage) being substantially reduced compared to locating a development of the scale elsewhere. This is, in the view of the Applicant an ideal location for wind farm development of this nature.

The distances to properties are > 1.9 km, and distances to settlements are >5 km. There are no on-site designations, core paths or areas of conservation interest. It is worth noting that shadow flicker was scoped out because all turbines are more than 10 rotor diameters from the nearest property.

Overall, the Development can rely on very strong support from all material considerations as set out within this Planning Statement.

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