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## INTRODUCTION

- 4.1 **Chapter 4: Renewable Energy and Planning Policy**, of the Environmental Impact Assessment (EIA) Report outlines the main policies of relevance to the determination of the application for Section 36 consent. It sets out a summary of the planning and regulatory context in relation to the key topics covered in the EIA Report, and also looks at the wider policy context in relation to climate change and renewable energy and other material considerations. The Chapter does not form a judgement on the proposed development's compliance with the policy framework at the time of submission, as this is addressed in the Planning Statement accompanying the application.
- 4.2 All the information contained in Chapter 4 of the EIA Report remains valid unless stated otherwise in this Supplementary Environmental Information (SEI) Chapter.
- 4.3 The following Technical Appendices associated with Chapter 4 of the EIA Report remain valid:
- **Technical Appendix 4.1: Legislation, Policy and Guidance.**
- 4.4 Since the submission of the Kirkton Energy Park application in November 2022 there has been some notable development in national policy relevant to the determination of the application. There has also been updates to the progress on Scotland and the United Kingdom meeting renewable energy targets. This SEI Chapter provides a summary of these updates.

## CLIMATE CHANGE AND RENEWABLE ENERGY POLICY

### Scotland Context

#### *Onshore Wind Policy Statement 2022*

- 4.5 The Scottish Government's 'Onshore Wind Policy Statement 22' (OWPS 22) was published in December 2022, focusing on the following areas:
- main ambitions and aspirations;
  - delivering on their ambitions in Scotland;
  - environmental considerations: how to achieve a good balance and maximise benefits;
  - benefits to local communities and financial mechanisms;
  - benefits to Scotland;
  - aviation considerations;
  - technical considerations; and
  - energy systems and regulation.

- 4.6 The OWPS '22 has been published with a purpose of restating the importance of onshore wind as a tool to accelerate Scotland's transition towards a net zero society. The policy cites the Russian invasion of Ukraine, and subsequent global energy crisis as an additional reason for the further development of onshore wind in Scotland. The statement emphasises the importance of onshore wind in Scotland as a cheap and reliable source of zero carbon electricity. Within the statement, the Scottish Government commits to an overall ambition of 20GW of total installed onshore wind capacity by 2030, increasing the current installed capacity by 11.3GW. Referring to the projection that Scotland's peak demand for electricity will at least double within the next two decades, the report states that *"This will require a substantial increase in installed capacity across all renewable technologies."*
- 4.7 The statement highlights the relative inexpensiveness to develop, and increasing profitability of onshore wind, showing that the cost of onshore wind has continued to fall over the contract for difference allocation rounds – showing costs of around 45% lower than in 2015.
- 4.8 The necessity for taller turbines has been reaffirmed in section 3.4.6 *"...What would previously have been considered 'taller' turbines are now more common and must continue to be deployed in appropriate locations..."* whilst in section 3.4.7 it reiterates why these turbines are a necessity *"Taller turbines have a higher installed capacity which results in the need for fewer turbines per site."*
- 4.9 With regards to landscape and visual amenity, the statement details the following in section 3.6.1 *"Meeting the ambition of a minimum installed capacity of 20GW of onshore wind in Scotland by 2030 will require taller and more efficient turbines. This will change the landscape."*
- 4.10 The statement clarifies the Scottish Government's position on the construction of new wind farms and their effect on the landscape further in section 3.6.2 *"The only areas where wind energy is not supported are National Parks and National Scenic Areas. Outside of these areas, the criteria for assessing proposals have been updated, including stronger weight being afforded to the contribution of the development to the climate emergency, as well as community benefits"* in accordance with National Planning Framework 4 (NPF4).
- 4.11 The OWPS '22 promotes community benefits, and the Scottish Government continues to encourage community benefits from all renewable energy businesses, as outlined in section 4.2. Along with community benefits, the statement advocates for an increase in shared ownership of renewables developments. The Scottish Government has set a target of 2GW of community and locally owned energy by 2030 as a minimum and encourages developers to consider shared ownership opportunities in all projects.

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

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

- 4.13 The Plan outlines several of the government’s targets to reach a net zero Scotland, with the main milestones and dates outlined as:
- to substantially increase Scotland’s renewable electricity generation capacity from the current level of 13.4 Gigawatts (GW) with an additional 20GW resulting in an overall capacity of at least 33.4GW by 2030;
  - aims to have 8-11GW of installed offshore, and an additional 12GW of installed onshore wind capacity by 2030;
  - for renewable and low-carbon hydrogen power to provide 5GW (the equivalent of 15% of Scotland’s current energy needs) by 2030, increasing to 25GW by 2045; and
  - to phase out the necessity for new petrol and diesel cars by 2032, and to reduce total car kilometres by 2030.
- 4.14 The plan also outlines general commitments made by the Government to assist with the transition to net zero, which include the following:
- to establish a national public energy agency – ‘Heat and Energy Efficiency Scotland’;
  - to increase the contributions of solar, hydropower and marine energy within Scotland’s energy mix;
  - to accelerate the decarbonisation of domestic industry, transport and heat in buildings;
  - to generate surplus electricity – allowing for the export of electricity and renewable hydrogen to support decarbonisation across Europe.;
  - to create energy security – through the development of Scotland’s resources and additional energy storage;
  - to allow for a just transition by maintaining or increasing employment in Scotland’s energy production sector against a decline in North Sea production; and
  - to maximise the use of Scottish manufactured components in the energy transition, ensuring high-value technology and innovation.

### *Onshore Wind Sector Deal for Scotland (2023)*

- 4.15 The Scottish Government’s ‘Onshore Wind Sector Deal for Scotland’ was signed and published in September 2023. The Sector Deal reaffirms the commitment outlined in the OWPS ‘22 to achieve 20GW of installed onshore wind capacity by 2030, and acknowledges that this will require a significant number of new sites to come forward and a speeding up of the determination process.

## PROGRESS TOWARDS TARGETS

### UK Context

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

- 4.16 The most recent Climate Change Committee’s progress reports to Parliament ‘Progress in reducing emissions’ was published in June 2023. As with previous reports, it restates the need for renewable energy and stronger actions on reducing emissions. The report advises that *“Renewable electricity capacity increased in 2022, but not at the rate required to meet the Government’s stretching targets, particularly for solar deployment. Given short lead-times, rapid deployment of onshore wind and solar could have helped to mitigate dependence on imported gas during the fossil fuel crisis.”*
- 4.17 With regards the speed of onshore wind deployment and constraints to increasing this, the report states *“Both onshore wind and solar deployment are progressing more slowly than offshore wind, in part due to barriers in the planning system, despite being among the cheapest forms of electricity generation.”*
- 4.18 The report also speaks positively regarding the trends seen with renewable energy and the UK’s historic leadership role stating *“The UK has had an impressive history of climate leadership. However, a muted response to the energy crisis, support for new fossil fuel production and a retreat from public leadership within the COP process all pose risks to the UK’s international reputation. These must all be addressed to reinstate the UK as a credible, impactful climate leader on the international stage.”*

### Scotland Context

- 4.19 **Tables 4-1** and **4-2** and **Graphs 4-1** and **4-2** set out how Scotland has made progress towards the renewable energy and greenhouse gas targets set by the Scottish Government. Since renewable energy targets are not yet being met, it is considered that the proposed development would make a valuable contribution to trying to achieve these ambitious targets.

**Table 4-1: Progress Against Renewable Energy Targets**

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

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

<sup>2</sup> Scottish Government Energy Statistics for Scotland – Q4 2020 <https://www.gov.scot/binaries/content/documents/govscot/publications/statistics/2018/10/quarterly-energy-statistics-bulletins/documents/energy-statistics-summary---march-2021/energy-statistics-summary---march-2021/govscot:document/Scotland+Energy+Statistics+Q4+2020.pdf>

## SEI RENEWABLE ENERGY AND PLANNING POLICY 4

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

**Table 4-2: Progress Against Greenhouse Gas Emissions Targets**

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

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

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

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

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

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

<sup>6</sup> Climate Change (Scotland) Act 2009, as amended by the Climate Change (Emissions Reduction Targets) (Scotland) Act 2019

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

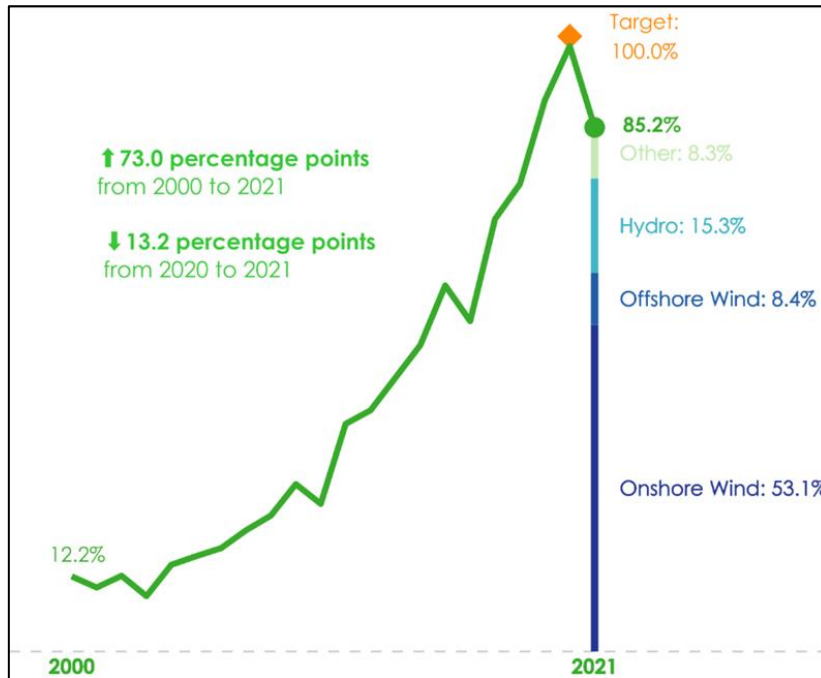
<sup>8</sup> Scottish Government Scottish Greenhouse Gas Statistics 2021: <https://www.gov.scot/binaries/content/documents/govscot/publications/statistics/2023/06/scottish-greenhouse-gas-statistics-2021/documents/scottish-greenhouse-gas-statistics-2021/scottish-greenhouse-gas-statistics-2021/govscot%3Adocument/scottish-greenhouse-gas-statistics-2021.pdf>

## SEI RENEWABLE ENERGY AND PLANNING POLICY 4

Year	Current Target <sup>6</sup> (% Reduction of Emissions relative to 1990)	Recommended Target <sup>7</sup> (% Reduction of Emissions relative to 1990)	Achieved / Progress <sup>8</sup>
2022	59.8%	53.8%	Most recent data available is 2021 figure.
2023	61.7%	56.4%	Most recent data available is 2021 figure.
2024	63.6%	59.1%	Most recent data available is 2021 figure.
2025	65.5%	61.7%	Most recent data available is 2021 figure.
2026	67.4%	64.4%	Most recent data available is 2021 figure.
2027	69.3%	67.0%	Most recent data available is 2021 figure.
2028	71.2%	69.7%	Most recent data available is 2021 figure.
2029	73.1%	72.3%	Most recent data available is 2021 figure.
2030	75% reduction.		Most recent data available is 2021 figure.
2040	90% reduction.		Most recent data available is 2021 figure.
2045	100% reduction.		Most recent data available is 2021 figure.

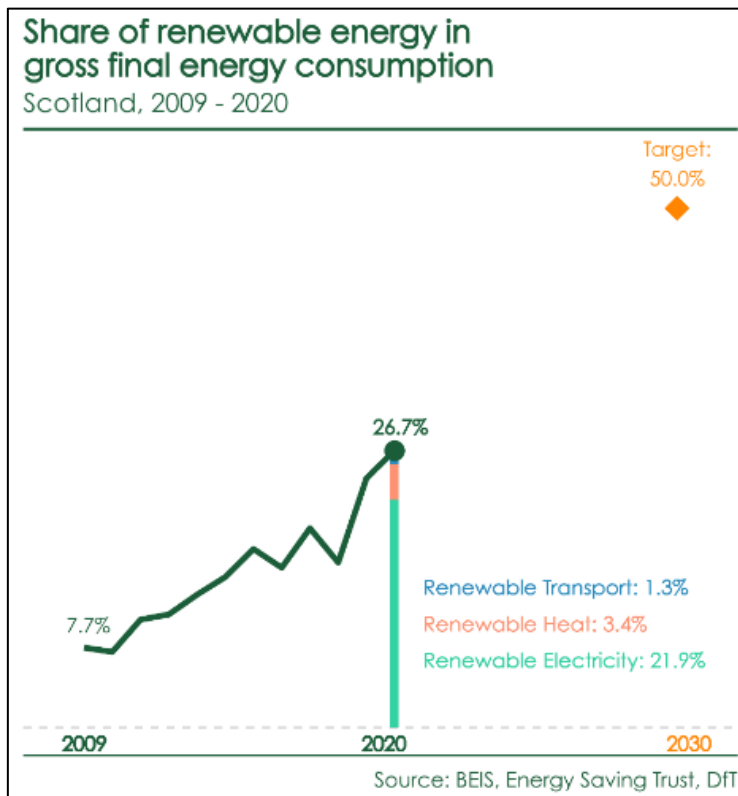
# SEI RENEWABLE ENERGY AND PLANNING POLICY 4

**Graph 4-1: Renewable Electricity Generation in Scotland**



Source: Energy Statistics for Scotland Q3 2022

**Graph 4-2: Progress against Renewable Energy Targets**



Source: Scottish Energy Statistics Hub, 2022



## PLANNING CONTEXT

### Local Context

#### *The Flow Country Candidate World Heritage Site Planning Position Statement*

4.20 On 04 May 2023, committee members of the Highland Council Economy and Infrastructure Committee approved the Highland Councils Flow Country Candidate World Heritage Site Planning Position Statement.

4.21 With regards to new development within and outwith the candidate World Heritage Site, the Position Statement refers to the National Planning Framework 4, stating:

*“Once [the candidate World Heritage Site is] inscribed, Policy 71 of NPF4 will be directly applicable: Policy 71: Development proposals affecting a World Heritage Site, or its setting will only be supported where their Outstanding Universal Value is protected and preserved.*

*Whilst this is not directly applicable until inscribed, it is recommended that its principle should be followed whilst the area is a candidate Site. In order to address this policy, any Development must therefore consider if the actions involved would result in any aspect of the OUV being impacted, notably the attributes and integrity.”.*

4.22 In line with the Position Statement and as a result of a request from THC (see SEI Chapter 1 for further detail), an Outstanding Universal Values (OUV) Assessment has been completed for the proposed Kirkton Energy Park.

### Scotland Context

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

4.23 The Scottish Government adopted the National Planning Framework 4 (NPF4) on 13 February 2023. NPF4 has now replaced National Planning Framework 3 (NPF3) and the Scottish Planning Policy 2014 (SPP). NPF3 and SPP no longer represent Scottish Ministers’ planning policy and should not form the basis for (or be taken into consideration when) determining planning applications or Section 36 applications.

4.24 NPF4 is now also part of the statutory Development Plan alongside Local Development Plans (LDPs) and their associated Supplementary Guidance, in this case The Highland-Wide Local Development Plan and the Caithness and Sutherland Local Development Plan.

4.25 Where there is an incompatibility between a provision of NPF4 and an LDP, the Town and Country Planning (Scotland) Act 1997 prescribes that the later document will prevail. For present purposes that is NPF4. Planning policy within the Development Plan constitutes a material consideration in the determination of Section 36 applications, although the Development Plan does not have an elevated status for the purposes of this application.

4.26 Within the national spatial strategy, the NPF4 identifies that there will be significant climate challenges for the North and West Coast and Islands Area (which includes the proposed site),

stating that the “.....coastal ecosystems, and the communities they support, are naturally more vulnerable to the effects of climate change, sea level rise and extreme events”. If action is not taken, it concludes that these “.... coastal communities could suffer disproportionately from the impacts of climate change”.

- 4.27 Whilst these areas are considered more vulnerable to climate change, the NPF4 identifies that there are significant opportunities to capitalise on the natural assets of the area to significantly reduce greenhouse gas emissions through increased renewable energy generation. In addition to tackling climate change, the NPF4 identifies that such development also has the potential to bring opportunities to strengthen local communities, build community wealth and secure long-term sustainability in the region.
- 4.28 The NPF4 states that a priority for these areas will be to “*maximise the benefits of renewable energy whilst enhancing blue and green infrastructure*”. Considering Scotland as a whole, the NPF4 in section 3 of Annex B, 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*”. Further to this, on the ‘need’ for strategic renewable electricity generation and transmission infrastructure, section 3 of Annex B notes “*Additional electricity generation from renewables and electricity transmission capacity of scale is fundamental to achieving a net zero economy and supports improved network resilience in rural and island areas*”.
- 4.29 Further to the above, ‘National Developments’ of which the proposed development is classed, are prescribed as such by the Scottish Government under s3A(4)(b) of the Town and Country Planning (Scotland) Act 1997, and the Town and Country Planning (Hierarchy of Developments) (Scotland) Regulations 2009. The need case for ‘National Developments’ is therefore already established.
- 4.30 In terms of national planning policy, the main policies that are most relevant to the proposed development are Policies 1, 3, 5 and 11 of NPF4. The following will look at the relevant aspects of these policies in more detail.

### Policy 1: Tackling the Climate and Nature Crisis

- 4.31 A key new policy is Policy 1: Tackling the climate and nature crises. This policy requires that “*significant weight will be given to the global climate and nature crises*” when considering all development proposals. The addition of this policy is reflective of the increased prominence and weight which the Scottish Government now expect to be given to the climate emergency in all planning decisions.

### Policy 3: Biodiversity

- 4.32 Policy 3: Biodiversity is another policy which will impact the decision-making process for the proposed development. This policy intends to: “*protect biodiversity, reverse biodiversity loss, deliver positive effects from development and strengthen nature networks*”.
- 4.33 Policy 3 (a) states: “*Development proposals will contribute to the enhancement of biodiversity, including where relevant, restoring degraded habitats and building and strengthening nature networks and the connections between them. Proposals should also integrate nature-based solutions, where possible.*”.

- 4.34 For applications that require an EIA such as the proposed development, Policy 3 (b) states that applications *“will only be supported where it can be demonstrated that the proposal will conserve, restore and enhance biodiversity, including nature networks so they are in a demonstrably better state than without intervention.”*.
- 4.35 Policy 3 (d) states: *“Any potential adverse impacts, including cumulative impacts, of development proposals on biodiversity, nature networks and the natural environment will be minimised through careful planning and design. This will take into account the need to reverse biodiversity loss, safeguard the ecosystem services that the natural environment provides, and build resilience by enhancing nature networks and maximising the potential for restoration.”*.

### Policy 4: Natural Places

- 4.36 Policy 4: Natural Places intends *“to protect, restore and enhance natural assets making best use of nature-based solutions.”* and is relevant to the proposed development due to the proximity to Special Areas of Conservation, Special Protection Areas, Sites of Special Scientific Interest, and also the candidate Flow Country World Heritage Site.
- 4.37 Policy 4 (b) states the following: *“Development proposals that are likely to have a significant effect on an existing or proposed European site (Special Area of Conservation or Special Protection Areas) and are not directly connected with or necessary to their conservation management are required to be subject to an “appropriate assessment” of the implications for the conservation objectives.”*.
- 4.38 Policy 4 (c) states the following: *“Development proposals that will affect a National Park, National Scenic Area, Site of Special Scientific Interest or a National Nature Reserve will only be supported where:*
- i. The objectives of designation and the overall integrity of the areas will not be compromised; or*
  - ii. Any significant adverse effects on the qualities for which the area has been designated are clearly outweighed by social, environmental or economic benefits of national importance.*
- All Ramsar sites are also European sites and/or Sites of Special Scientific Interest and are extended protection under the relevant statutory regimes.”*.
- 4.39 Policy 4 (e) states the following: *“The precautionary principle will be applied in accordance with relevant legislation and Scottish Government guidance.”*.

### Policy 5: Soils

- 4.40 Policy 5: Soils intends to *“protect carbon-rich soils, restore peatlands and minimise disturbance to soils from development.”* and is especially relevant to this proposed development due to the relative prevalence of peatland on the Site, and the amount of peatland present within the region as a whole. Policy 5 (a) goes on to say that:
- “Development proposals will only be supported if they are designed and constructed:*
- i. In accordance with the mitigation hierarchy by first avoiding and then minimising the amount of disturbance to soils on undeveloped land”*.

4.41 Policy 5 (c) states the following with regards to when development on peatland habitat will be considered acceptable:

*“Development proposals on peatland, carbon rich soils and priority peatland habitat will only be supported for:*

*i. Essential infrastructure and there is a specific locational need and no other suitable site;*

*ii. The generation of energy from renewable sources that optimises the contribution of the area to greenhouse gas emissions reductions targets;.....”.*

4.42 Policy 5 (d) goes into further detail regarding what is required of developments that are proposed on peatland, carbon rich soils, or priority peatland habitat. It states that in these instances:

*“a detailed site-specific assessment will be required to identify:*

*i. the baseline depth, habitat condition, quality, and stability of carbon rich soils;*

*ii. the likely effects of the development on peatland, including on soil disturbance; and*

*iii. the likely net effects of the development on climate emissions and loss of carbon.*

*This assessment should inform careful project design and ensure, in accordance with relevant guidance and the mitigation hierarchy, that adverse impacts are first avoided and then minimised through best practice. A peat management plan will be required to demonstrate that this approach has been followed, alongside other appropriate plans required for restoring and/ or enhancing the site into a functioning peatland system capable of achieving carbon sequestration.”.*

### Policy 7: Historic Assets and Places

4.43 Policy 7 intends *“to protect and enhance historic environment assets and places, and to enable positive change as a catalyst for the regeneration of places.”* and is relevant to the proposed development due to nearby cultural heritage assets, including scheduled monuments.

4.44 Policy 7 (a) states: *“Development proposals with a potentially significant impact on historic assets or places will be accompanied by an assessment which is based on an understanding of the cultural significance of the historic asset and/or place. The assessment should identify the likely visual or physical impact of any proposals for change, including cumulative effects and provide a sound basis for managing the impacts of change.”.*

4.45 Policy 7 (h) states: *“Development proposals affecting scheduled monuments will only be supported where:*

*i. direct impacts on the scheduled monument are avoided;*

*ii. significant adverse impacts on the integrity of the setting of a scheduled monument 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.”.*

## Policy 11: Energy

4.46 Policy 11: Energy, intends to “encourage, promote and facilitate all forms of renewable energy development onshore and offshore.” Policy outcomes are identified as: “expansion of renewable, low carbon and zero emission technologies”. The policy states that development proposals for wind farms outwith National Parks and National Scenic Areas will be supported, whilst also considering the impacts that have been identified. It is recognised that “significant landscape and visual 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”. In terms of the impacts, the policy goes on to state 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 emissions reduction targets”.

4.47 Policy 11: Energy, is as follows:

*“a) Development proposals for all forms of renewable, low-carbon and zero emissions technologies will be supported. These include:*

- i. wind farms including repowering, extending, expanding and extending the life of existing wind farms;*
- ii. enabling works, such as grid transmission and distribution infrastructure;*
- iii. energy storage, such as battery storage and pumped storage hydro;*
- iv. small scale renewable energy generation technology;*
- v. solar arrays;*
- vi. proposals associated with negative emissions technologies and carbon capture; and*
- vii. proposals including co-location of these technologies.*

*b) Development proposals for wind farms in National Parks and National Scenic Areas will not be supported.*

*c) 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.*

*d) Development proposals that impact on international or national designations will be assessed in relation to Policy 4.*

*e) 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.*

*In considering these impacts, significant weight will be placed on the contribution of the proposal to renewable energy generation targets and on greenhouse gas emissions reduction targets.*

*Grid capacity should not constrain renewable energy development. It is for developers to agree connections to the grid with the relevant network operator. In the case of proposals for grid infrastructure, consideration should be given to underground connections where possible.*

*f) Consents for development proposals may be time-limited. Areas identified for wind farms are, however, expected to be suitable for use in perpetuity.”*

### Other Relevant NPF4 Policies

- 4.48 In addition to the above NPF4 policies, the following are also considered applicable to the proposed development: 2) Climate mitigation and adaptation , 12) Zero Waste, , 18) Infrastructure First, , 20) Blue and green infrastructure, , 22) Flood risk and water management, 23) Health and safety, 25) Community wealth building, 29) Rural development, 30) Tourism, and 33) Minerals.

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