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CHARTERED TOWN PLANNERS

Glenburnie Wind Farm
Section 36 Application:

Planning Statement Update

May 2025

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Contents

1. Introduction

1.1 Background

1.1.1 This Planning Statement Update has been prepared by David Bell Planning Ltd ('DBP') on behalf of Renewable Energy Systems Ltd ('the applicant') in relation to the proposed Glenburnie Wind Farm ('the revised proposed development') located north-east of the A697, approximately 9.9 km north-north-east of Lauder, within the administrative boundaries of the Scottish Borders Council ('the Council' or 'SBC') administrative area.

1.1.2 As the revised proposed development has a generating capacity in excess of 50 megawatts ('MW'), consent is required from Scottish Ministers under Section 36 of the Electricity Act 1989 ('the 1989 Act'). In addition, a request is being made by the applicant that planning permission is deemed to be granted under Section 57(2) of the Town and Country Planning (Scotland) Act 1997, as amended ('the 1997 Act').

1.1.3 The application for consent submitted in October 2023 was accompanied by an Environmental Impact Assessment Report ('EIA Report October 2023') which presents the findings of an EIA undertaken in accordance with the Electricity Works (Environmental Impact Assessment) (Scotland) Regulations 2017 ('the EIA Regulations'). The EIA Report October 2023 presents information on the identification and assessment of the likely significant environmental effects of the original proposed development.

1.1.4 Since the submission of the application for consent of the original proposed development, consultation responses have been received from stakeholders and discussions have been held with the Energy Consents Unit ('ECU'), Historic Environment Scotland ('HES'), NatureScot, among others, regarding technical aspects of the original proposed development.

1.1.5 Further to the consultation responses and subsequent discussions, the applicant proposes some design changes to alter the original proposed development. The layout of the original proposed development has been re-designed reducing it from a 19-wind turbine development to a 12-wind turbine development (the 'revised proposed development'), with a subsequent reduction in the site boundary. In summary, wind turbines numbered T1-T4 and T17-T19 have been deleted.

1.1.6 The applicant has therefore prepared Additional Environmental Information ('AEI') as set out in an AEI Report. This includes information relating to the likely significant effects of the revised proposed development. The AEI Report considers and assesses the difference between the environmental effects assessed in the EIA Report October 2023 and describes the changes to likely significant effects of the revised proposed development.

1.1.7 This Planning Statement Update considers the revised proposed development against the energy, climate change and planning policy framework. In addition, given the time that has elapsed since the Section 36 application was submitted, an update is provided in relation to the energy and planning policy matters which have emerged over this approximate 18-month period.

1.1.8 This Planning Statement Update also considers the balance between the potential benefits and the effects which may arise and concludes as to the overall acceptability of the revised proposed development in relation to the energy and planning policy framework and relevant material considerations.

1.2 Changes to the Original Proposed Development

1.2.1 The application for consent under Section 36 of the Electricity Act 1989 ('the 1989 Act and deemed planning permission under section 57(2) of the Town and Country Planning (Scotland) Act 1997 ('the 1997 Act') was submitted by the applicant in October 2023 and was supported by an Environmental Impact Assessment Report ('EIA Report October 2023') undertaken in accordance with the Electricity Works (Environmental Impact Assessment) (Scotland) Regulations 2017 ('the EIA Regulations'). The EIA Report October 2023 presents information on the identification and assessment of the likely significant positive and negative environmental effects of the original proposed development.

1.2.2 The application sought consent in relation to the construction and operation of a wind farm, comprising 19 turbines and associated infrastructure.

1.2.3 The revised proposed development comprises the following infrastructure:

- up to 12 three-bladed horizontal axis wind turbines of up to 220m tip height with an installed capacity of 79.2 MW. The wind turbines would be nominally rated at 6.6 MW.
- at each wind turbine, associated low to medium voltage transformers and related switchgear;
- wind turbine foundations;
- hardstand areas for erection cranes at each wind turbine location;
- a network of access tracks including watercourse crossings, passing places, turning heads and site entrance from the D124;
- borrow pits (dependent on availability of stone within the site);
- a substation compound containing electrical infrastructure, control building, welfare facilities and a communications mast;
- a battery energy storage system ('BESS'), rated at 50 MW and associated compound;
- a transfer station;
- public road widening along sections of the D124;
- a network of buried electrical and communication cables;
- temporary construction compounds;
- signage; and
- habitat management and biodiversity enhancement and restoration (this information is set out in detail in **AEI Chapter 8: Terrestrial Ecology** and **AEI Technical Appendix 8.6: Outline Biodiversity Enhancement and Restoration Plan**).

1.2.4 The changes to the original proposed development are as follows:

- Deletion of wind turbines T1-T4 and T17-T19;
- Deletion of the access track sections leading to T1-T4 and T17-19;
- Addition of a abnormal indivisible load ('AIL') turning head at T16.

1.2.5 The revised proposed development is expected to operate for up to 50 years following which decommissioning of the wind turbines and other infrastructure would be undertaken or an application may be submitted to repower the revised proposed development.

1.3 Structure of Statement

1.3.1 This Planning Statement Update is structured as follows:

- **Chapter 2** sets out the up-to-date position with regard to the renewable energy policy and emissions reduction legislative framework, highlighting principal changes which have emerged since October 2023;
- **Chapter 3** summarises the benefits that would arise from the revised proposed development;
- **Chapter 4** sets out a policy appraisal update in relation to National Planning Framework 4 ('NPF4') – this is very much a summary position given a comprehensive appraisal was presented in the original Planning Statement, submittedin October 2023 as part of the Section 36 application.
- **Chapter 5** provides an updated in relation to the Local Development Plan ('LDP') for SBC. Since the Section 36 application was submitted the SBC has adopted a new LDP which alongside NPF4, forms part of the statutory Development Plan.
- **Chapter 6** presents overall conclusions and consideration of the planning balance with reference to the conclusions set out in the AEI Report and the updates to the planning and energy policy framework.

2. The Renewable Energy Policy & Legislative Framework: Update

2.1 Introduction

2.1.1 This chapter refers to the renewable energy policy and emissions reduction legislative framework with reference to relevant international, UK and Scottish provisions. The framework of international agreements and obligations, legally binding targets and climate change global advisory reports is the foundation upon which national energy policy and greenhouse gas emissions ('GHG') reduction law is based. This underpins what can be termed the need case for renewable energy from which the revised proposed development can draw a high level of support.

2.1.2 It is evident that there is clear and consistent policy support at all levels, from international to local, for the deployment of renewable energy generally, to combat the global climate crisis, diversify the mix of energy sources, achieve greater security of supply, and to attain legally binding emissions reduction targets.

2.1.3 UK and Scottish Government renewable energy policy and associated renewable energy and electricity targets are important considerations. It is important to be clear on the current position as it is a fast-moving topic of public policy. The context of international climate change commitments is set out. This is followed by reference to key UK level statutory and policy provisions and then a description of relevant Scottish Government statutory and policy provisions.

2.1.4 The original Planning Statement (October 2023) that was submitted with the application addressed the renewable energy policy and legislative framework (Chapter 2) and addressed international climate change obligations. This chapter provides an update to that policy framework, with an emphasis on new policy and legislative provisions which have emerged over the last 18 months. Key updates include the following which are referred to below:

> At the UK Government level:

- Carbon Budget 7 (2025);
- The UK Battery Strategy (2023);
- The Climate Change Committee ('CCC') Report to UK Parliament (2024);
- The Labour Government & commitment to renewables (2024); and
- The Clean Power 2030 Action Plan (2024).

> At the Scottish Government level:

- CCC Report to Scottish Parliament – Progress in reducing emissions in Scotland (March 2024);
- Statement to the Scottish Parliament on climate change matters (18 April 2024);
- The Climate Change (Emission Reduction Targets) (Scotland) Act (2024);
- The Scottish Government's Green Industrial Strategy (2024).

2.1.5 In addition, reference is made to the Onshore Wind Policy Statement (2022) (OWPS) in order to provide ease of reference to its key provisions as it is a key policy document. The OWPS, as referenced in the original Planning Statement, referred to Scotland's onshore wind deployment figures as of December 2022. However, this is brought up to date in this Planning Statement Update by reference to the BVG Associates monitoring report of November 2024

which provides more recent onshore wind deployment figures and also statistics in relation to onshore wind at different stages within the planning system.

2.2 UK Climate Change & Energy Legislation & Policy

The Climate Change Act 2008 & Carbon Budgets

2.2.1 The Climate Change Act 2008 ('the 2008 Act') provides a system of carbon budgeting. Under the 2008 Act, the UK committed to a net reduction in GHG emissions by 2050 of 80% against the 1990 baseline. In June 2019, secondary legislation was passed that extended that target to at least 100% against the 1990 baseline by 2050, with Scotland committing to net zero by 2045.

2.2.2 The 2008 Act also established the Climate Change Committee ('CCC') which advises the UK Government on emissions targets, and reports to Parliament on progress made in reducing GHG emissions.

2.2.3 The CCC has produced seven, four yearly carbon budgets, covering 2008 – 2042. These carbon budgets represent a progressive limitation on the total quantity of GHG emissions to be emitted over the five-year period as summarised in **Table 2.1** below. Essentially, they are five yearly caps on emissions.

2.2.4 These legally binding 'carbon budgets' act as stepping-stones toward the 2050 target. The CCC advises on the appropriate level of each carbon budget and once accepted by Government, the respective budgets are legislated by Parliament.

Table 2.1: Carbon Budgets and Progress[1]

Budget	Carbon budget level	Target Reduction below 1990 levels	Progress on Budgetary Period (reduction amount v Target)
1st carbon budget (2008 – 2012)	3,018 $MtCO_2e$	26%	-27%
2nd carbon budget (2013 – 2017)	2,782 $MtCO_2e$	32%	-42%
3rd carbon budget (2018 – 2022)	2,544 $MtCO_2e$	38% by 2020	-50%[2]
4th carbon budget (2023 – 2027)	1,950 $MtCO_2e$	52% by 2025	n/a
5th carbon budget (2028 – 2032)	1,725 $MtCO_2e$	57% by 2030	n/a
6th carbon budget (2033 – 2037)	965 $MtCO_2e$	78% by 2035	n/a
7th carbon budget (2038 – 2042)	535 $MtCO_2e$	87% by 2042	n/a
Net Zero Target	100%	By 2050	

2.2.5 The Sixth Carbon Budget ('CB6') requires a reduction in UK greenhouse gas emissions of 78% by 2035 relative to 1990 levels. This is seen as a world leading commitment, placing the UK "*decisively on the path to net zero by 2050 at the latest, with a trajectory that is consistent with the Paris Agreement*" (CB6, page 13).

[1] Source: Climate Change Committee (CCC).

[2] Confirmed by CCC in 'Final Statement for the Third Carbon Budget' May 2024. By the end of the period in 2022, UK net GHG emissions were 50% lower than the base year emissions.

2.2.6 Page 23 of CB6 refers to the devolved nations and sets out that UK climate targets cannot be met without strong policy action across Scotland, Wales and Northern Ireland. Key points from CB6 include:

- UK climate targets cannot be met without strong policy action in Scotland.
- The CCC is clear in setting out that new demand for electricity will mean that electricity demand will rise 50% to 2035 and doubling or even trebling by 2050.
- CB6 needs to be met and that will need more and faster deployment of renewable energy developments than has happened in the past.
- The related 'Methodology Report' from the CCC advice, states that in all scenarios for the carbon budget and looking ahead to 2050, the CCC sees new onshore wind generation being deployed by 2050. They set out that their modelling reflects this by almost doubling onshore wind capacity to 20-30 GW in all scenarios by 2050.

2.2.7 Following the CB6, the UK Government announced on 20 April 2021 that it would set the world's most ambitious climate change target into law (by the Carbon Budget Order 2021 (the Order)[3]) to reduce emissions by 78% by 2035 compared to 1990 levels. This effectively brings forward the UK's previous commitment of an 80% reduction by 2050 by 15 years.

2.2.8 The Seventh Carbon Budget ('CB7') was published by the CCC in February 2025. The CCC's recommended level for CB7, namely a limit on the UK's GHG emissions over the five-year period 2038 to 2042 is 535 $MtCO_2e$ including emissions from international aviation and shipping.

2.2.9 Page 12 of the CB7 states:

"*By the middle of the Seventh Carbon Budget on our pathway, emissions in the UK will be only a quarter of the level they are today, and 80% lower than levels in 1990 (90% lower excluding emissions from international aviation and shipping.) Achieving this will require a significant reduction in emissions across sectors including surface transport, buildings, industry and agriculture*."

2.2.10 It sets out (page 12) that achieving CB7 will mean that UK based renewable energy provides the bulk of generation and this will replace oil and gas across most of the economy. It adds that "*this requires twice as much electricity as today by 2040*".

2.2.11 It further states that low carbon supply by 2040 will see offshore wind grow sixfold from 15 GW of capacity in 2023 to 88 GW by 2040. It adds that "*onshore wind capacity doubles to 32 GW by 2040 and solar capacity increases to 82 GW*" (page 13).

2.2.12 In relation to the increase in onshore wind capacity, CB7 sets out (page 106) that "*this will require recent annual installation rates to treble this decade, requiring installation rates comparable to the annual rollout rates previously sustained during the mid 2010s*".

The UK Battery Strategy (2023)

2.2.13 The UK Government published the UK Battery Strategy on 26 November 2023. The Strategy brings together Government activity to achieve a globally competitive battery supply chain by 2030 that supports economic prosperity and the Net Zero transition in the UK.

2.2.14 In summary, the Government's vision is for the UK to continue to grow a thriving battery innovation system and to become a world leader in sustainable design, manufacture and use.

2.2.15 The Strategy was developed with the UK Battery Strategy Task Force, drawing upon a call for evidence and engagement with business and stakeholders. The Strategy is based around the

[3] The Order sets the carbon budget for the 2033-2037 budgetary period at 965 million tonnes of carbon dioxide equivalent. The net UK carbon account is defined in section 27 of the Climate Change Act 2008.

'design, build, sustain' approach and through the strategy sets the key objectives that the UK will:

- Design and develop batteries for the future;
- Strengthen the resilience of UK manufacturing supply chains; and
- Enable the development of a sustainable battery industry.

2.2.16 In the foreword to the document, the Minister of State for Industry and Economic Security at the Department of Business and Trade states that (page 3):

"Batteries will play an essential role in our energy transition and our ability to successfully achieve Net Zero by 2050."

2.2.17 Batteries are seen as key to the Net Zero transition as they enable more flexible use of energy such as maximising use of intermittent low carbon generation.

Climate Change Committee Report to UK Parliament (2024)

2.2.18 The CCC published the report 'Progress in Reducing Emissions 2024 Report to Parliament' in July 2024 (the "CCC Report"). The Executive Summary (page 8) states:

"*The previous Government signalled the slowing of pace and reversed or delayed key policies. The new Government will have to act fast to hit the country's commitments.*

The cost of key low-carbon technologies is falling, creating an opportunity for the UK to boost investment, reclaim global climate leadership and enhance energy security by accelerating take-up. British-based renewable energy is the cheapest and fastest way to reduce vulnerability to volatile global fossil fuel markets. The faster we get off fossil fuels, the more secure we become."

2.2.19 The CCC Report makes it clear that urgent action is needed to get on track for the UK's 2030 emissions reduction target. In this regard it states:

"*The UK has committed to reduce emissions in 2030 by 68% compared to 1990 levels, as its Nationally Determined Contribution (NDC) to the Paris Agreement. It is the first UK target set in line with Net Zero. Now only six years away, the country is not on track to hit this target despite a significant reduction in emissions in 2023. Much of the progress to date has come from phasing out coal generated electricity, with the last coal-fired power station closing later this year. We now need to rapidly reduce oil and gas use as well.*

Our assessment is that only a third of the emissions reductions required to achieve the 2030 target are currently covered by credible plans. Action is needed across all sectors of the economy, with low carbon technologies becoming the norm."

2.2.20 The CCC Report sets out priority actions (page 9) and it states that the UK should now be in a phase of rapid investment and delivery, however CCC note that all indicators for low carbon technology roll out are "*off track, with rates needing to significantly ramp up*." In this regard in terms of renewable technologies it states onshore wind installations will need to double.

2.2.21 Chapter 2 of the CCC Report confirms that the third Carbon Budget was met (covering the period 2018 to 2022), however "*future carbon budgets will require an increase in the pace and breadth of decarbonisation. It is imperative that an ambitious path of emissions reduction is maintained towards Net Zero*." (Page 33).

2.2.22 Section 2.3 of the CCC Report addresses emissions reductions required for future Carbon Budgets. Paragraph 2.3.1 states that:

"*emissions reductions across most sectors will need to significantly speed up to be on track to meet the UK's climate targets in the 2030s, and therefore the long term target of Net Zero by 2050. Emissions reductions will need to outperform the legislated Fourth Carbon Budget for the UK to be on a sensible path to achieve its 2030 NDC, the Sixth Carbon Budget and Net Zero*."

2.2.23 Chapter 3 of the CCC Report examines indicators of current delivery progress and it references a number of key points (page 50) including *inter alia*:

"*Required pace – substantial progress is needed on a range of key indicators over the rest of this decade, to get the UK on track to meet its 2030 emissions targets. Low carbon technologies need to quickly become the default options in many areas…*

Renewable energy capacity has been growing steadily. However, roll-out rates will need to increase, compared to those since the start of this decade, to deliver the capacity needed by the end of the decade. Annual installations of offshore wind will need to more than treble, onshore wind more than double and solar increase by a factor of five."

2.2.24 Reference is made to electricity supply (page 56). With regard to onshore wind it states that only 0.5 GW of new onshore wind was installed in 2023 and "*this is considerably below the peak of 1.8 GW in 2017. Onshore wind installation rates will need to more than double compared to the average pace of deployment over the past three years*."

2.2.25 Chapter 2 of the CCC Report addresses the risks to the UK in achieving its emissions reduction targets.

2.2.26 With regard to the Fourth Carbon Budget (2023-2027) it states that although credible plans cover almost all of the emissions reductions required to meet it "*this budget was set before the UK's Net Zero target was legislated. The UK will need to reduce emissions by double the amount implied by the target to be on a sensible path to Net Zero*…."

2.2.27 With regard to the 2030 NDC and Sixth Carbon Budget (for the period 2023 to 2037) the CCC Report states that credible plans cover only around a third of emissions reductions needed to meet the UK's 2030 NDC and a quarter of those needed to meet the Sixth Carbon Budget. It adds "*that 2030 NDC is now only six years away. While our assessment of the policies and plans to deliver it has improved slightly, there remains significant risks to achieving these goals*."

Labour Government & Commitment to Renewables (2024)

2.2.28 The UK Government change at Westminster in 2024 and a Labour administration for the UK is of relevance in terms of the new UK Government policy approach to Net Zero.

2.2.29 Energy policy is reserved to Westminster and although the Scottish Government has progressed its own energy policy in parallel with its full devolved authority over the planning system in Scotland, UK Government policy is an important material consideration.

2.2.30 The Department for Energy Security and Net Zero ('DESNZ') issued a Statement on 8 July 2024 which included references to double UK onshore wind capacity from its current level of approximately 15 GW to a planned capacity of 30 GW by 2030.

UK Government: Clean Power 2030 Action Plan (2024)

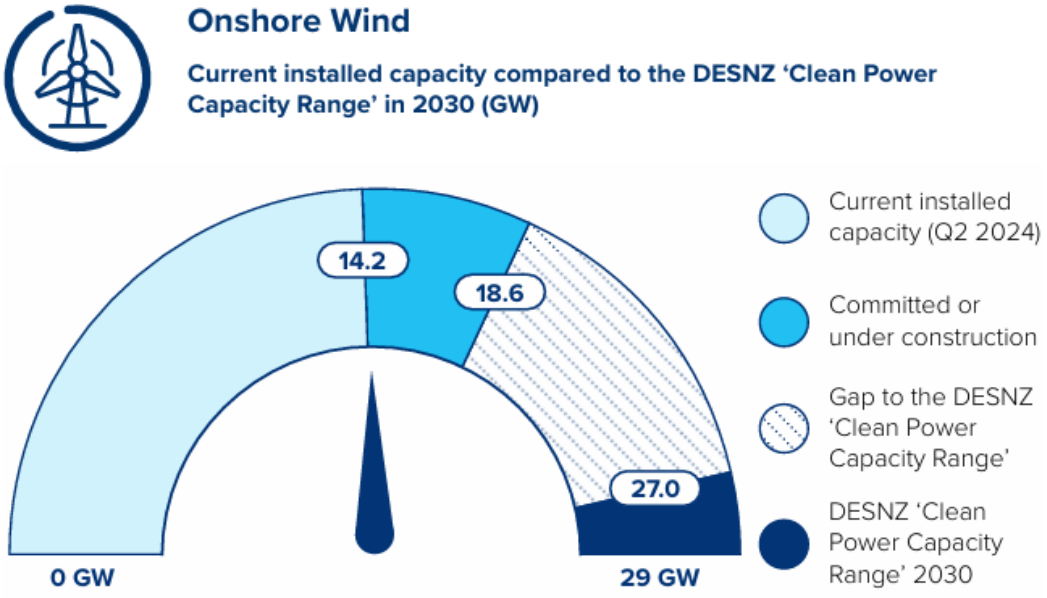
2.2.31 In addition, a key new material consideration is the Clean Power 2030 Action Plan, issued by DESNZ in December 2024. It sets out (page 9) that Britain needs to install "*clean sources of power at a pace never previously achieved*".

2.2.32 It further adds (page 10):

"*clean power by 2030 will herald a new era of clean energy independence and tackle three major challenges: the need for secure and affordable energy supply, the creation of essential new energy industries supported by skilled workers in their thousands, the need to reduce greenhouse gas emissions and limit our contribution to the damaging effects of climate change. Clean power by 2030 is a sprint towards these essential goals*".

2.2.33 Within the Action Plan, it sets out that by 2030 there should be 27-29 GW of onshore wind operational within the UK. At present, there is only some 14.2 GW of installed onshore wind capacity in the UK.

Figure 2.1: Onshore Wind & 'Gap' to reach 2030 UK Target



2.2.34 The document adds that "*Meeting the clean power 2030 goal is key to accelerating to net zero, not only in eliminating emissions that currently come from electricity generation, but also by way of the application of clean power in the buildings, transport and industry sectors… The shift to a clean power system by 2030 forms the backbone of the transition to net zero, as we move to an economy much more reliant on electricity*".

2.2.35 There is therefore a significant gap between the target onshore wind capacity for 2030 compared to what is currently installed. The gap is some 14.8 GW of required new capacity and the bulk of that is expected to be delivered in Scotland. As noted above, the CCC has recommended that the UK achieve a higher figure of 32 GW of onshore wind in its projections for the Seventh Carbon Budget.

2.2.36 Page 74 of the Action Plan states that "Meeting the renewable capacity set out in the DESNZ 'clean power capacity range' is achievable but will require deployment at a sharply accelerated scale and pace".

2.3 Climate Change & Renewable Energy Policy: Scotland

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

2.3.1 The Scottish Government has set legal obligations to decarbonise and reduce emissions and has a statutory target to achieve Net Zero by 2045. It is clear that to have any hope of achieving this target, significant expansion of renewable generation capacity is required as confirmed in the most recent advice from the CCC.

2.3.2 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. The Climate Change (Emissions Reduction Targets) (Scotland) Act 2019 amended the 2009 Act and set more ambitious targets.

CCC Report to Scottish Parliament – Progress in reducing emissions in Scotland (2024)

2.3.3 The CCC produced a report to the Scottish Parliament entitled 'Progress in reducing emissions in Scotland' in March 2024. The related press release of the same date states that Scotland's 2030 climate goals are no longer credible. It states:

"*Continued delays to the updated Climate Change Plan and further slippage in promised climate policies mean that the Climate Change Committee no longer believes that the Scottish Government will meet its statutory 2030 goal to reduce emissions by 75%. There is no comprehensive strategy for Scotland to decarbonise towards Net Zero.*

The Scottish Government delayed its draft Climate Change Plan last year despite the 2030 target being only six years away. This has left a significant period without sufficient actions or policies to reach the target; the required acceleration in emissions reduction in Scotland is now beyond what is credible."

2.3.4 The related press release stated that there is a path to Scotland's post-2030 targets, but stronger action is needed to reduce emissions across the economy.

2.3.5 The main report (page 10) states that "*The Scottish Government should build on its high ambition and implement policies that enable the 75% emissions reduction target to be achieved at the earliest date possible*."

2.3.6 Page 18 of the report addresses electricity supply, and it states that there has been some progress in delivering renewable electricity generation in Scotland. Reference is made to the Government's aim to develop 8-11 GW of offshore wind and 20 GW on onshore wind capacity, both by 2030. The report notes that "*The growth in onshore wind capacity has slowed, however, and is slightly off track to deliver its 2030 target, which will require operational capacity to more than double*."

2.3.7 Page 40 states that in terms of onshore wind, Scotland must increase the deployment rate by more than a factor of 4 to an average annual rate of 1.4 GW.

Statement to the Scottish Parliament (2024)

2.3.8 In light of the CCC Report, the Cabinet Secretary made a statement to the Scottish Parliament on 18 April 2024 entitled 'Climate Change Committee Scotland Report – Next Steps: Net Zero Secretary Statement'.

2.3.9 The key points in the statement include:

- The Scottish Government has an "*unwavering commitment to ending our contribution to global emissions by 2045 at the latest, as agreed by Parliament on a cross-party basis*".
- The Cabinet Secretary states that she is "*announcing a new package of climate action measures which we will deliver with partners to support Scotland's transition to net zero*".
- The statement sets out that in terms of the policies for these measures, "*they sit alongside extensive ongoing work that will be built upon through our next Climate Change Plan and Green Industrial Strategy*."
- The Cabinet Secretary states that, "*The Climate Change Committee is clear that the 'UK is already substantially off track for 2030' and achieving future UK carbon budgets 'will require a sustained increase in the pace and breadth of decarbonisation across most major sectors'.. Indeed, we do see climate backtracking at the UK level*."

2.3.10 The Cabinet Secretary added:

"*And with this in mind, I can today confirm that, working with Parliament on a timetable, the Scottish Government will bring forward expedited legislation to address matters raised by the CCC and ensure our legislative framework better reflects the reality of long-term climate policy making*."

2.3.11 The Scottish Government has reiterated its commitment to achieving net zero by 2045 and has now brought forward the new legislation referred to. The approach to dealing with the position set out by the CCC in relation to the 2030 target being unachievable, has been to move to a multi-year carbon budget approach to measuring emissions reduction (instead of annual targets) which has now brought the Scottish Parliament in line with the Welsh and UK approaches.

The Climate Change (Emissions Reduction Targets) (Scotland) Act 2024

2.3.12 On 5 September 2024 the Scottish Government introduced the Climate Change (Emission Reduction Targets) (Scotland) Bill to the Scottish Parliament. The Bill was passed on 5 November 2024 and became an Act on 22 November 2024. The Act repeals the annual and interim emissions reduction target framework that was established under the 2009 Act and establishes a carbon budget approach to target setting, with budgets to be set through secondary legislation using the latest advice from the CCC, once available, to replace the concept of statutory annual and interim targets. The Act also makes provision for a new Climate Change Plan to be published that reflects the carbon budgets.

2.3.13 As explained, the Act followed advice from the CCC that Scotland's interim emissions reduction target for 2030 could not be achieved. The Act does not change the existing statutory target of Net Zero emissions by 2045.

2.4 The Onshore Wind Policy Statement

2.4.1 The Scottish Government published an updated Onshore Wind Policy Statement ('OWPS') on 21 December 2022. It replaced the version published in November 2017.

2.4.2 The Ministerial Foreword makes it clear that seeking greater security of supply and lower cost electricity generation are now key drivers alongside the need to deal with the climate emergency. In this regard, the Cabinet Secretary for Net Zero, Energy and Transport states (page 3):

"*that is why we must accelerate our transition towards a net zero society. Scotland already has some of the most ambitious targets in the world to meet net zero but we must go further and faster to protect future generations from the spectre of irreversible climate damage*".

"*Scotland has been a frontrunner in onshore wind and, while other renewable technologies are starting to reach commercial maturity, continued deployment of onshore wind will be key to ensuring our 2030 targets are met*".

2.4.3 The Foreword states that onshore wind has the ability to be deployed quickly, is good value for consumers and is also widely supported by the public. The Minister further states that:

"*This Statement, which is the culmination of an extensive consultative process with industry, our statutory consultees and the public, sets an overall ambition of 20 GW of installed onshore wind capacity in Scotland by 2030.*

While imperative to meet our net zero targets it is also vital that this ambition is delivered in a way that is fully aligned with, and continues to enhance, our rich natural heritage and native flora and fauna, and supports our actions to address the nature crisis and the climate crisis".

2.4.4 The OWPS is structured on the basis of eight chapters which contain a mix of policy guidance and also technical information. Key content of relevance to the Proposed Development is referenced below.

Increasing the Rate of Deployment & Forecast Increase in Electricity Demand

2.4.5 Chapter 1 "Ambitions and Aspirations" (page 5) refers to current deployment of onshore wind in Scotland and states:

"*We must now go further and faster than before. We expect the next decade to see a substantial increase in demand for electricity to support net zero delivery across all sectors, including heat, transport and industrial processes*."

2.4.6 It is explained that National Grid's Future Energy Scenarios[4] project concludes that Scotland's peak demand for electricity will at least double within the next two decades and that this will require a substantial increase in installed capacity across all renewable technologies.

Onshore Wind Target & Development Pipeline

2.4.7 In terms of existing deployment, paragraph 1.1.5 of the OWPS states that as of June 2022 the UK had 14.6 GW of installed onshore wind, with around 8.7 GW of this capacity within Scotland. Reference is made to a figure of 11.3 GW of onshore wind "*currently in the pipeline, spread over 217 potential projects*".

2.4.8 There are more recent figures available in relation to onshore wind deployment. The figures are reviewed regularly by BVG Associates as part of the Onshore Wind sector Deal arrangements. An update report entitled 'Scotland Onshore Wind Pipeline Analysis 2024-2030' was published by BVG Associates in November 2024 ('the BVG Report').

2.4.9 The report presents a database and pipeline analysis, providing insights into different scenarios under which Scotland could achieve its ambition of 20 GW of onshore wind by 2030. It examines various sensitivities to assumptions on key parameters including matters such as the duration of the planning process for applications, repowering and also project viability. The assumptions in relation to the planning process reflect the aims of the Onshore Wind Sector Deal. If these are not met, then there will be negative consequences for the onshore wind pipeline.

2.4.10 **Table 2.2** below shows the onshore wind pipeline figures as contained in the OWPS alongside the summary of the updated analysis from the BVG Report, allowing a comparison of the various pipeline category figures between those in the OWPS (June 2022) and the BVG Report figures of November 2024. The relative differences between the various categories are also shown.

[4] National Grid has set out a range of different, credible ways to decarbonise the energy system with regard to attaining Net Zero for the UK by 2050.

Table 2.2: Onshore Wind Development Pipeline (OWPS 2022 & BVG Report 2024)

Status of Onshore Wind Projects	OWPS (GW)	BVG Report (April 2024) (GW)	Difference 2022 v 2024 (GW)	Comments
In the Planning / Process	5.53	6.70	+ 1.17	Footnote on page 6 of OWPS applies. Not all projects will receive consent.
Awaiting Construction (i.e. consented)	4.56	6.47	+ 1.91	The figures are subject to some duplication – e.g. where some projects have consent but are also subject say to applications for tip height increases. Not all consented developments will proceed to construction.
Under Construction	1.17	0.97	- 0.2	
Sub Total (less in planning category)	**5.73**	**7.44**	**+ 2.88**	
Operational Onshore Wind in Scotland	**8.70**	**10.02**	**+ 1.32**	A number of projects will reach the end of their operational life. Not all will necessarily be repowered or life extended. A proportion of the operational capacity will have passed its notional design life by 2030 and will be under consideration for decommissioning or repowering.
Total (less in planning category)	14.43	17.46	+ 3.03	

2.4.11 The footnote to the figures set out on page 6 of the OWPS is pertinent and is as follows:

"*Developments in the planning/consenting process have not yet been considered and given permission to proceed. Some of these projects will receive consent, but some may not, and it is unlikely that all of this noted capacity will be fully realised. A degree of duplication within the planning system must also be considered, where developments which have consent re-apply to adjust the parameters of that consent. This will also reduce the capacity which is deliverable from this overall figure*".

2.4.12 The analysis of the pipeline in the BVG Report is based upon a model which applies several 'filters' which result in projects being removed from the pipeline and these include matters such as:

- Projects which remain in the same development status for too long which is a reasonable indication that they are likely to be dormant and therefore are not likely to proceed;
- Projects with turbine attributes which today would likely put that project at a commercial disadvantage such as relatively low blade tip height, such as 150 m or less; and
- Application of an attrition rate in relation to applications being refused consent.

2.4.13 Although the BVG Report sets out some suggested actions which could increase the likelihood of reaching 20 GW in 2030, these have various limitations. For example, the suggested actions include:

- An action is suggested to reduce the default planning determination duration times to shorter ones; however, this would be very much dependent upon the allocation of additional resources in the planning system and there is no evidence of that happening at the present time; and
- A further action is to assume repowering of all onshore wind developments at the end of their life and assume an uplift on original capacity of 100%. Again, this assumption has its limitations and there is also no evidence that widespread repowering is going to be undertaken on such a basis. However, extensions of operational life are likely to remain an attractive option in many cases.

2.4.14 The BVG Report cautions (page 22) that the ability to deliver 20GW by 2030 is likely to be restricted by current resource constraints. Their analysis predicts that these constraints include that the number of current consent decisions from the ECU (Scottish Government) will need to at least double for at least three of the next five years.

2.4.15 The BVG Report (page 15) also states that "*it remains clear that a significant increase in consent decisions made each year at the ECU level will be required to reach the 20 GW by 2030 target, and that the reduced development times promised by the [Onshore Wind Sector Deal] ….will be essential if Scotland is to achieve the 20 GW operational onshore wind by 2030*."

2.4.16 The BVG Report also highlights that the continued issue of Eskdalemuir (Seismic Array constraint), a potential Galloway National Park, and the recent designation of the Flow Country World Heritage Site is likely to result in a loss of some 1.9 GW and 3 GW of operational capacity in 2030 in the deployment scenarios considered.

2.4.17 There are therefore a number of factors which indicate that there is likely to be a significant shortfall in the minimum (ie not capped) 20 GW 2030 onshore wind target.

Delivering the Government's 20 GW Ambition for Onshore Wind

2.4.18 Chapter 2 of the OWPS entitled 'Delivering on our Ambition for Onshore Wind in Scotland' states that the Scottish Government is to form an Onshore Wind Strategic Leadership Group (SLG) and "*will task this SLG with taking forward the aspirations of this policy statement, and the development of an Onshore Wind Sector Deal*". This reflects the importance of the onshore wind sector.

2.4.19 Section 2.3 refers to a "Vision for Onshore Wind in Scotland" and states that Scottish Renewables, on behalf of the sector in Scotland, has produced a Vision Statement which the Government considers "*to lay the basis of a more detailed sector deal that the SLG will develop*".

2.4.20 The Onshore Wind Sector Deal was finalised and published in September 2023 and is referenced further below.

2.4.21 The Vision Statement is contained within Annex 5 of the OWPS (page 66). A summary of the Vision for the onshore wind industry in Scotland is a future where:

- An additional 12 GW of new onshore wind generation is constructed by 2030.
- Onshore wind continues to play a key role in decarbonising the power sector, reducing consumer costs and ensuring security of supply whilst playing a key role in the electrification of heat and transport.
- The selection of wind farm locations and technologies enables the use of the most productive modern turbines and balances the need to respect biodiversity and natural heritage.

- Land use for onshore wind is optimised and combined with other initiatives including reforestation and peatland restoration, as well as providing enhanced access to green space for recreation.
- New and repowering projects consistently receive high levels of public support.
- High skilled and sustainable jobs are created, including long term jobs in the operational phase.
- Material use is optimised, and carbon impact is minimised, through the principles of a circular economy.
- Community benefit and shared ownership provides lasting social and economic benefits; and
- Onshore wind plays a central role in ensuring a just transition for communities and people.

2.4.22 The Vision Statement states (page 67) that:

"*Onshore wind remains vital to meeting this increasing demand, providing fast deployment whilst minimising cost to the consumer. This will be achieved by deploying the most productive modern turbines that are taller than older models, by re-powering existing sites where possible and by maximising the use of our exceptional natural wind resource where environmental effects are acceptable*."

Balancing Environmental Considerations and Benefits

2.4.23 Chapter 3 of the OWPS "Environmental Considerations: Achieving Balance and Maximising Benefits" refers to matters relating to specific environmental topics as follows:

- Shared Land Use;
- Peat and Carbon-Rich Soils;
- Forestry;
- Biodiversity;
- Landscape and Visual Amenity; and
- Noise.

2.4.24 Landscape and Visual Amenity is addressed at Section 3.6 in Chapter 3 of the OWPS with direct cross references to NPF4. Paragraph 3.6.1 states (original emphasis):

"*Meeting our climate targets will require a rapid transformation across all sectors of our economy and society. This means ensuring the right development happens in the right place. Meeting the ambition of a minimum installed capacity of 20 GW of onshore wind in Scotland by 2030 will require taller and more efficient turbines. This will change the landscape."*

2.4.25 As referenced below, NPF4 policy expressly recognises that significant landscape and visual impacts are to be expected and the OWPS emphasises that as a result there will be changes in Scotland's landscape.

2.4.26 Paragraph 3.6.2 of the OWPS, in cross-referencing NPF4, makes it clear that outside of National Parks and National Scenic 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*".

2.4.27 There is therefore express direction of greater weight attaching to the benefits of the development in terms of how it contributes to tackling the climate emergency. The removal of the Spatial Framework for onshore wind farms, as previously required by Scottish Planning Policy (SPP), also gives rise to fewer locational constraints.

2.4.28 Paragraph 3.6.5 makes reference to Landscape Sensitivity Studies and makes it clear that these should not be used in isolation to determine matters of acceptability but can be a useful tool in assessing specific sensitivities within an area. It should be noted that the term is now landscape sensitivity, in comparison with SPP paragraph 162 which encouraged Landscape Capacity Studies. This reflects NatureScot's 2022[5] guidance.

2.4.29 Paragraph 3.6.3 also makes reference to the NPF4 Policy 11 criteria with regard to energy development stating that "*where impacts are localised and/or appropriate design mitigation has been applied, they will generally be considered to be acceptable*".

OWPS Conclusions

2.4.30 Page 49 of the OWPS sets out overall conclusions and these include *inter alia* the following key points:

- Deployment of onshore wind is "*mission critical for meeting our climate targets*".
- As an affordable and reliable source of electricity generation, "*we must continue to maximise our natural resource and deliver net zero in a way that is fully aligned with, and continues to protect our natural heritage and native flora and fauna*".
- A renewed commitment to this technology will ensure we keep "*leading the way in onshore wind deployment and support within the UK*".
- The Scottish Government has established "*a clear expectation of delivery with our ambition for a **minimum installed capacity of 20GW** of onshore wind in Scotland by 2030 and providing a vehicle for that delivery through the creation of* [the] *Onshore Wind Strategic Leadership Group*" (emphasis added).

2.4.31 It is stated that "*Onshore wind will remain an essential part of our energy mix and climate change mitigation efforts, but we are also in a nature crisis. Onshore wind farms must strike the right balance in how we care for and use our land*…".

2.4.32 The term "mission critical" is strong language and indicates onshore wind is crucial and extremely important to the attainment of the Government's policy and legislative objectives. This is fundamentally different policy language to that contained within National Planning Framework 3 (NPF3) and SPP.

2.5 The Draft Energy Strategy and Just Transition Plan

2.5.1 The Scottish Government published a Draft 'Energy Strategy and Just Transition Plan' entitled 'Delivering a fair and secure zero carbon energy system for Scotland' on 10 January 2023. It is referenced in detail at section 2.3 of the original Planning Statement.

2.5.2 The draft Strategy sets out key ambitions for Scotland's energy future including more than 20 GW of additional renewable electricity on and offshore by 2030.

2.6 The Green Industrial Strategy

2.6.1 The Scottish Government published a Green Industrial Strategy ('GIS') in September 2024. The Executive Summary sets out the mission of the GIS, namely:

"*This Green Industrial Strategy's mission is to ensure that Scotland realises the maximum possible economic benefit from the opportunities created by the global transition to net zero*".

[5] NatureScot, Landscape Sensitivity Assessment Guidance, paragraph 8 (2022).

2.6.2 The GIS sets out five opportunity areas for Scotland where identified strengths are most likely to lead to growth and the potential to grow Scotland's exports. These areas relate to Scotland's wind economy, carbon capture and storage, supporting the green economy by way of professional and financial services, growing the hydrogen sector and establishing Scotland as a competitive centre for clean energy intensive industries of the future.

2.6.3 Page 6 sets out that GIS forms a key part of the Government's broader National Strategy for Economic Transformation. It states that "*It also links explicitly to our Just Transition Plans which describe how the transition to net zero in the most emitting sectors will be achieved in a way that delivers economic, social and community benefits, including fair work, environmental preservation and reduced poverty and inequality*."

2.6.4 The first of the five opportunity areas is in relation to 'maximising Scotland's wind economy'. It states that this:

"*is about making the most of our natural resources, established onshore and offshore wind sectors and first-mover advantage in floating offshore wind to generate clean electricity; participating in global supply chains as well as expanding our domestic supply chain capacity and seizing opportunities across the offshore wind supply chain, from infrastructure to manufacturing; positioning Scotland as a leader in material circularity of wind turbines and components.*"

2.6.5 Actions include *inter alia*:

- Supporting investment to improve essential infrastructure, expanding supply chains and secure manufacturing opportunities;
- Developing and maintaining a pipeline of investment propositions backed by clear information about the timing and nature of renewable energy opportunities;
- Delivering planning and consenting systems which enable Scotland's net zero development pipeline; and
- Exploring the circularity opportunity in onshore wind.
- Page 13 states clearly that the single goal of the GIS is to help Scotland realise economic growth opportunities from the global transition to net zero.

2.6.6 Onshore wind is referred to in some detail at page 21 where the GIS states:

"*Onshore wind is the biggest single technology in Scotland's current mix of renewable electricity generation, comprising 62% of installed capacity.*

A thriving onshore wind sector is therefore critical to the decarbonisation in Scotland and the UK. As set out in our 2022 Onshore Wind Policy Statement, Government and industry are focused on delivering at least 20 GW of onshore wind by 2030 (doubling current capacity) and recent pipeline analysis shows that we should be on track to deliver this.

This trajectory is underpinned by the Onshore Wind Sector Deal which sets out a set of specific collaborative actions which include commitments by both the Scottish Government and the onshore wind industry to help deliver the 20 GW ambition.

A supportive policy environment and successful industry collaboration via the Onshore Wind Strategic Leadership Group confirms the shared commitment of Government and industry to achieve this successful and responsible growth.

The onshore wind workforce is highly skilled and opportunities in installation, consulting, operations and maintenance are anticipated to rise in response to growth ambitions. Specialised engineering consultancy services such as wind farm design and financial due diligence related to onshore developments are expected to grow and offer additional export potential. There is commercial opportunity in circular supply chains related to the UK wind industry. Scotland's established, and now ageing onshore wind assets may also offer

opportunities for innovative solutions in remanufacturing, recycling, and decommissioning end of life assets."

2.6.7 It is clear therefore that to progress the Government's objectives with regard to wind energy, there needs to be clear support for new investment and growth in onshore wind development. Realising the economic and social opportunities will only be achieved through the development and consenting of additional wind energy developments. Such deployment will not only be critical towards achieving the net zero target, given the important contribution that wind energy will make in that regard, but will also help deliver the Government's clear green infrastructure mission.

2.7 Conclusions on the Renewable Energy Policy & Legislative Framework

2.7.1 It is considered that the revised proposed development is very strongly supported by the climate change and renewable energy policy and legislative framework.

2.7.2 The trajectory, in terms of the scale and pace of action required to reduce emissions, grows ever steeper and it is essential that rapid progress is made otherwise the legally binding target in Scotland of Net Zero by 2045 will not be met.

2.7.3 The change from annual Scottish emission reduction targets to a system of carbon budgets has served to show that Scotland is not on track to attain Net Zero, and it strengthens the case for rapidly approving schemes that can contribute to this goal. The overall target of Net Zero remains unchanged.

2.7.4 Decisions through the planning and wider consenting system must be responsive to this position. Decision makers can do this by affording substantial weight to the energy policy objectives articulated above, in the planning balance in a given case.

2.7.5 In terms of the energy policy considerations, it is helpful to reference the most recent position of the Scottish Ministers with regard to a Section 36 wind farm decision. Section 36 consent was granted by the Scottish Ministers on 08 November 2024 for the Clachaig Glen Wind Farm within Argyll and Bute. From paragraph 109 *et seq* of the Decision Letter, the Scottish Ministers in commenting on the acceptability of the development stated:

"*As set out above, the seriousness of climate change, its potential effects and the need to cut carbon dioxide emissions, remain a priority for the Scottish Ministers. Scotland's renewable energy targets and climate change ambitions, energy policies and planning policies are all material considerations when weighing up this proposed development. NPF4, the Energy Strategy and the OWPS make it clear that renewable energy deployment remains a priority of the Scottish Government. The OWPS in particular reaffirms the vital role for onshore wind in meeting Scotland's energy generation targets and net zero emissions ambitions. This is a matter which should be afforded significant weight in favour of the proposed development.*

The transition to a low carbon economy is an opportunity for Scotland to take advantage of our natural resources to grow low carbon industries and create jobs.

The Scottish Ministers are satisfied that the proposed development will provide a contribution to renewable energy targets and carbon savings. The Scottish Ministers are also satisfied that it is entirely consistent with the Scottish Government's policy on the promotion of renewable energy and its net zero emissions ambitions."

2.7.6 In the most recent renewable energy policy documents referred to, there is a consistent and what might be termed a 'green thread' which ties a number of related policy matters together: namely the urgent challenge and imperative of attaining and sustaining net zero and the need to substantially increase renewable capacity, notably onshore wind.

2.7.7 The Draft Energy Strategy for Scotland forms part of the new policy approach alongside NPF4. These documents confirm the Scottish Government's policy objectives and related targets, reaffirming the important role that onshore wind will play in response to the climate crisis which is at the heart of all these policies.

2.7.8 It must follow that the need case for the revised proposed development is to be afforded substantial weight in the planning balance. The way that decision makers can do that is by properly recognising the seriousness and importance of energy policy related considerations in the planning balance. It is the cumulative effect of a large number of individual projects which will move Scotland towards where it needs to be in order to attain net zero.

3. The Benefits of the Revised Proposed Development

3.1 The Benefits: Summary

3.1.1 This chapter summarises the benefits that would arise from the revised proposed development.

Renewable Energy Generation

> With an installed capacity of up to 129.2 MW (79.2 MW onshore wind and 50 MW battery storage) the revised proposed development would make a valuable and important contribution to the attainment of the UK and Scottish Government policies of encouraging renewable energy developments; and in turn contribute to the achievement of UK and Scottish Government renewable energy and net zero targets. As explained, there is now a distinct shift in policy emphasis from the displacement of higher carbon electricity generation to extending the use of electricity as the critical energy response to the climate emergency.

> The UK legally binding target of net zero GHG emissions by 2050 and the Scottish Government target of net zero by the earlier date of 2045 are major challenges, as explained in the previous chapter. The Scottish Government has made it clear that onshore wind plays a vital and indeed "*mission critical*" role in the attainment of future targets in relation to helping to combat the crisis of global heating.

Emissions Savings

> The earlier that steps towards decarbonisation are introduced, the greater their contribution to limiting climate change. The revised proposed development's delivery of renewable capacity in the near term will have a disproportionately higher benefit than the same capacity delivered later.

> The carbon balance calculations establish that the revised proposed development could result in the saving of approximately 121,429 tonnes of CO_2 equivalent emissions per annum (or 6,071,450 tonnes over the anticipated 50-year lifespan of the revised proposed development) if a fossil fuel mix of electricity generation were used as the counterfactual position.

Security of Supply & Battery Storage

> The national energy policy position seeks an increase to the requirements for both the scale and the urgency of delivery of new low carbon generation capacity, by refocussing the requirement for low-carbon power for reasons of national security of supply and affordability, as well as for decarbonisation.

> With this context, the attractiveness of onshore wind, as a proven technology which will deliver significant benefits to consumers through decarbonisation, security of supply and affordability this decade, becomes clear.

> The revised proposed development, if consented, would provide a valuable contribution to security of supply for the wider region, Scotland and for the wider Great Britain ('GB') area. Consenting the revised proposed development, would contribute to an adequate and dependable Scottish and GB generation mix, through enabling the generation of more low carbon power from indigenous and renewable resources, and would enable the revised proposed development to make a significant contribution to Scottish and wider UK energy security and decarbonisation needs.

> BESS will play a vital role in ensuring the full potential capacity of existing and future renewable energy generation is exploited and the successful transition to a net-zero future. BESS imports renewable energy when supply is typically at its highest and in excess of demand, storing it, and then exporting it back to the grid when demand is high, but supply is low (e.g. still, cloudy days).

> Furthermore, the BESS also has the potential to supply the grid with essential energy security functions including:

- **Voltage support services:** Batteries can supply the network with quickly dischargeable energy during low voltage periods or blackouts; to date these scenarios have typically been managed by reliance on quickly dispatchable fossil fuel energy generators (typically gas peaking plants); and
- **Grid stabilisation services (inertia):** Inertia is incredibly important for the stable operation of the electricity system; it is a by-product of coal and gas-fired generators, however renewables like wind and solar are not able to provide inertia. As older coal and gas plants come off the system and renewable energy generation becomes the dominant source of energy nationally, we need to find new ways to provide grid stability. BESS are able to provide these stability services.

Socio-Economic Benefits

> **AEI Chapter 13: Socio-economics, Tourism & Recreation** provides an update in relation to the socio-economic effects of the revised proposed development. In summary, the revised proposed development would support jobs during construction and during operation across the Scottish economy. Overall, the socio-economic effects of the capital investment, employment and GVA to the economy would be beneficial (short term during construction, long term during operation). Key benefits would include the following:

> During the construction phase, the revised proposed development is expected to support, in net terms, approximately:

- 104 person years net employment and provide £9.7 million Gross Value Added (GVA) benefiting the Scottish Borders,
- 401 person years net employment and provide £37.0 million GVA benefitting Scotland; and
- 841 person years net employment provide £77.9 million GVA benefitting the UK (including Scotland);

> For the course of the operational phase, the assessment states that in relation to job creation from the combined direct and supply chain effects, the overall total number of gross full-time equivalent jobs that could be created in the Scottish Borders local authority area is estimated to amount to between 24 and 33 gross permanent jobs (i.e., between 5 and 9 direct jobs, plus between 19 and 24 indirect jobs). The assessment further explains that when the various additionality factors are taken into account, the effect would be expected to lie in the range 21-29 net additional jobs.

> The main contractor is likely to be Scotland-based, but it is assumed that whoever is appointed as the main contractor, that a significant proportion of the work will be carried out by sub-contractors and labour resident in the Scottish Borders and Central Scotland. The applicant is committed to giving local businesses every possible opportunity to share in the financial and employment benefits of the construction and operation of the revised proposed development. If consented and constructed, the revised proposed development will offer opportunities for local businesses such as accommodation providers, hire companies, fencing contractors, tradesmen etc.

Community Benefits

- As set out in the original Planning Statement, a community benefit package would be established to support the communities who host and are closest to the revised proposed development. The applicant takes a tailored approach and consults with the local community to get an understanding of local priorities and to seek suggestions for projects that could help to secure long term economic social and environmental benefits for the area.
- The Applicant is committed to the provision of community benefits and will provide £5,000 per MW per year during the operational life of the revised proposed development, reflective of current Scottish Government best practice guidelines. Based upon a candidate wind turbine nominally rated at 6.6 MW, the total installed capacity of the revised proposed development would be 79.2 MW. This would equate to up to £396,000 annually or £19.8 million over the operational life of the revised proposed development
- The benefits package could also include the applicant's Local Electricity Discount Scheme ('LEDS') or provide funding for projects that sit outside the parameters of a traditional application-based fund. As set out in the original Planning Statement, should the revised proposed development receive consent, the area of benefit would be determined in consultation with locally elected representatives from the closest communities.
- It is acknowledged that community benefit payments are not a material planning consideration.

Biodiversity Enhancement

- Significant biodiversity enhancements are proposed as set out in an Outline Biodiversity Enhancement and Restoration Plan ('OBERP') (AEI Technical Appendix 8.6 (AEI Report Volume 3).

4. Development Plan Policy Appraisal

4.1 Introduction

4.1.1 As set out in Chapter 1, a Planning Statement was prepared in October 2023 which appraised the original proposed development against the provisions of NPF4. The appraisal addressed the following key policies of NPF4:

- Policy 1: Tackling the Climate and Nature Crises;
- Policy 3: Biodiversity;
- Policy 4: Natural Places;
- Policy 5: Soils;
- Policy 7: Historic Assets and Places; and
- Policy 11: Energy.

4.1.2 The conclusion of the NPF4 policy appraisal was that overall, the original proposed development as a National Development was considered to be one that would make a valuable contribution to the NPF4 Spatial Strategy and would help deliver a sustainable place. Overall, it was considered that the original proposed development would accord with the relevant policies of NPF4 and with NPF4 when read as a whole. Following a review of the additional environmental information containment within the AEI Report, this conclusion is maintained in relation to the revised proposed development.

4.2 The Additional Environmental Information

4.2.1 As set out in Chapter 2 of the AEI Report, in February 2024, Historic Environment Scotland ('HES') objected to the original proposed development on the grounds of adverse impact on the integrity of the setting of four scheduled monuments, namely: Addinston, Fort (SM362), Longcroft, Fort (SM372), Glenburnie, Fort (SM4473) and Longcroft Hill, Homestead (SM4480). HES considered that the original proposed development would affect the understanding, appreciation and experience of these scheduled monuments, which would amount to significant adverse impacts on the integrity of the setting of each asset such that there would be a conflict with NPF4 Policy 7. Whilst HES considered that a number of assets would be impacted by the original proposed development, they considered the greatest impact would be on the assets identified above.

4.2.2 As explained in the introduction to this Planning Statement Update, the applicant subsequently reviewed the comments raised by HES and, as part of a post-submission design review process, the decision was taken to modify the layout, reducing it from a 19-wind turbine development to a 12-wind turbine development. The proposed wind turbine deletions comprise wind turbines T1 - T4 and T17 - T19, which were identified by HES as being of key concern.

4.2.3 **AEI Chapter 7: Cultural Heritage & Archaeology** provides a summary of assessment of the original proposed development, a summary of HES's comments and an assessment of the revised proposed development for each of the assets listed above.

4.2.4 The four assets specified above have been reassessed by the applicant in respect to the revised proposed development. It has been established that whilst adverse impacts remain, the integrity of the setting of the scheduled monuments would not experience significant adverse impacts. It is considered that the revised proposed development accords with NPF4 Policy 7.

4.2.5 The AEI Report sets out the findings in relation to other EIA topics and does not report any additional significant effects as a result of the revised proposed development when compared to the original proposed development. Given the reduction in scale of the revised proposed development there are inevitably reduced impacts arising in respect of a number of topics, in particular in relation to landscape and visual effects.

4.3 The adopted Scottish Borders LDP

4.3.1 The original Planning Statement addressed the relevant policies of the Scottish Borders LDP which was adopted in 2016. As noted in Chapter 1, a new LDP was adopted in August 2024.

4.3.2 In a Report by the Director of Infrastructure and Environment of SBC dated 28 September 2023 (post the adoption of NPF4) it is set out that planning officers of SBC were content with the conclusions and recommendations contained within the Examination Report for the new LDP and SBC was recommended by officers to agree the Reporter's modifications in full and to proceed towards formal adoption of the new LDP.

4.3.3 The Report sets out that a number of modifications were made to the LDP and most of these were minor and sought to align the policies with NPF4.

4.3.4 The Report specifically references the then proposed policy ED9 'Renewable Energy Developments' and it states (page 6 of the Report):

"*Modification to the policy and its supporting text to align with NPF4. The Reporter concluded that in the interest of consistency and to reflect national commitments to address the climate and nature crisis, Policy ED9 has been modified to indicate that development proposals for all forms of renewable, low-carbon and zero emissions technologies will be assessed in accordance with Policy NPF4 11. The Reporter also concludes that the existing Supplementary Guidance and studies may still provide useful tools in helping to identify landscape characteristics and sensitivities, albeit in a different policy context. Therefore, reference to these has been included within the introductory text before the policy itself*."

4.3.5 The Report also states that Chapter 8 of the new LDP has been "*updated to align with current legislation and national policy, in respect of sustainability and climate change*."

4.3.6 It is considered that the new LDP is now sufficiently aligned with NPF4 such that there are not any incompatibilities with it and NPF4.

4.3.7 A further important modification to Policy ED9 is the modification referring to NPF4 Policy 11 (Energy) namely:

"*Development proposals will be assessed in accordance with NPF4 Policy 11 paragraphs b) to f) and other relevant provisions of NPF4*."

4.4 LDP Policies

4.4.1 Relevant policies from the LDP are referenced in **Table 4.1**.

Table 4.1: Relevant LDP (2024) Policies

Policy	Policy Summary	Comments re NPF4
PMD1 Sustainability	The preamble to the policy sets outs that SBC will encourage sustainable development. The policy states that SBC will have regard to various sustainability principles in determining planning applications. They relate to matters including sustainable use of land, water quality, protection of natural resources including landscape, habitats and species, built and cultural heritage, efficient use of energy, minimisation of waste, encouragement of walking and cycling, minimising light pollution, protection of public health and safety and the provision of new jobs and support to the local economy.	No conflicts with NPF4.
PMD2 Quality Standards	The policy aims to ensure all new development is of a high quality. It states all development should fit with Scottish Border's townscapes and integrate with its landscape surroundings. It references matters such as layout, orientation, digital connectivity, water usage, hard and soft landscaping works. The policy also covers placemaking and design considerations with reference to matters such as scale, massing and height, materials and various other site planning and urban design considerations.	No conflicts with NPF4.
ED9 Renewable Energy Development	The policy sets out SBC's overall approach to proposals for all forms of renewable energy development, including wind energy proposals, grid transmission, solar arrays and energy storage. The policy states that: "*development proposals will be assessed in accordance with NPF4 Policy 11 paragraphs b) to f) and other relevant provisions of NPF4*."	No conflicts with NPF4.
ED10 Protection of Prime Quality Agricultural Land & Carbon Rich Soil	The policy states that it applies to all development except proposals for renewable energy development. With regard to renewable energy development, it sets out that such proposals will be permitted if they accord with the objectives and requirements of Policy ED9.	No conflicts with NPF4.
HD3 Protection of Residential Amenity	The policy states that development judged to have an adverse impact on the amenity of existing or proposed residential areas will not be permitted. Assessment criteria include matters such as open space considerations, scale, form and type of development as well as matters such as overlooking, loss of privacy and daylight standards.	No conflicts with NPF4.
EP1 International Nature Conservation Sites and Protected Species	The aim of the policy is to give designated or proposed Natura sites, Ramsar sites and sites where there is likely to be the presence of European Protected Species, protection from potentially adverse development. The policy sets out development management tests in relation to proposals which are likely to have a significant effect on such designations.	No conflicts with NPF4.
EP2 National Nature Conservation	The aim of policy is to protect nationally important nature conservation sites and protected species. These include designation such as Sites of Special Scientific Interest (SSSI) and National Nature Reserves (NNR). As with policy EP1, this policy sets	No conflicts with NPF4.

Policy	Policy Summary	Comments re NPF4
and Protected Species	out development management tests in relation to development proposals that are likely to have a significant adverse effect, either directly or indirectly on such designations.	
EP3 Local Biodiversity	The purpose of the policy is to safeguard and enhance local biodiversity. The policy sets out development management tests in relation to development that would have an unacceptable adverse effect on Border's Notable Species and Habitat of Conservation Concern. The policy states that any development that could have such impact should avoid fragmentation of habitats and be sited and designed to minimise adverse impact.	No conflicts with NPF4.
EP4 National Scenic Areas	The aim of the policy is to protect and enhance the scenic qualities of the two National Scenic Areas (NSA) at Eildon and Leaderfoot and Upper Tweeddale. The policy sets out that development that may affect NSAs will only be permitted where (a) the objectives of designation on the overall landscape value of the site and its surrounds will not be compromised or (b) any significant adverse effects on the qualities for the site or its surrounds have been designated are clearly outweighed by social or economic benefits of national importance.	No conflicts with NPF4.
EP5 Special Landscape Areas	The aim of the policy is to ensure that local areas of identified landscape quality - Special Landscape Areas (SLA) are afforded protection against inappropriate development. The policy sets out that SBC, in assessing proposals for development that may affect SLAs, will seek to safeguard landscape quality and have particular regard to landscape impact of development including visual impact. It adds that proposals that have a significant adverse impact will only be permitted where the landscape impact is clearly outweighed by social or economic benefits of national or local importance.	NPF4 Policy 4 (Natural Places) states that development that has a significant adverse impact on the integrity of a local landscape designation can be supported if the benefits would be of more than local importance.
EP7 Listed Buildings	The aim of the policy is to protect Listed Buildings from development that would spoil their historic and architectural interest. The policy sets out that SBC will support development that conserves, protects and enhances the character, integrity and setting of Listed Buildings. Other aspects of policy relate to internal or external alterations and extensions to Listed Buildings or new developments within the curtilage of such buildings.	No conflicts with NPF4.
EP8 Historic Environment Assets and Scheduled Monuments	The aim of the policy is to give Scheduled Monuments and other archaeological or historic assets, including Battlefields, strong protection from potentially damaging development. In terms of Scheduled Monuments, the policy sets out the same provisions as contained in NPF4 Policy 7 (Historic assets and places). In terms of regional or local archaeological assets, the policy states that proposals that would adversely affect such assets would only be permitted if it can be demonstrated that the benefits of the proposal would clearly outweigh the heritage value of the asset.	No conflicts with NPF4.

Policy	Policy Summary	Comments re NPF4
EP9 Conservation Areas	The aim of the policy is to preserve or enhance the character or appearance of Conservation Areas. The focus of the policy is in relation to development proposals within or adjacent to a Conservation Area.	No conflicts with NPF4.
EP10 Gardens and Designed Landscapes	The aim of the policy is to protect the character of Gardens and Designed Landscapes (GDL) from development that would adversely affect their special character. The policy states that the Council will support development that safeguards or enhances the landscape features, character or setting of sites listed in the Inventory of GDL or sites included in historic gardens and designed landscape records. It adds that all development should be carefully sited and be of the highest standards of design, using appropriate finishing and materials. It adds that proposals that result in an unacceptable adverse impact will be refused.	No conflicts with NPF4.
EP13 Trees, Woodlands & Hedgerows	The aim of the policy is to give protection to the woodland resource of the Scottish Borders. The policy sets out that the SBC will refuse development that would cause the loss or serious damage to the woodland resource unless the public benefits of development clearly outweigh the loss of landscape, ecological, recreational, historical or shelter value. The policy adds that where there is unavoidable loss of woodland then there should be replacement planting where possible.	No conflicts with NPF4.
EP15 Development Affecting the Water Environment	The policy is aimed at ensuring development does not adversely affect the water environment. It states that decision making will be guided by assessment of various considerations including potential pollution of surface or underground water, flood risk and compliance with current best practice on Sustainable Urban Drainage.	No conflicts with NPF4.
IS5 Protection of Access Routes	The policy states that development that would have an adverse impact upon an access route available to the public will not be permitted unless a suitable diversion or appropriate alternative route can be provided.	No conflicts with NPF4.

4.4.2 Although there is a difference in wording between the LDP Policy EP5 (Special Landscape Areas) and NPF4 Policy 4 (Natural places) it is not considered to be an incompatibility.

Supplementary Guidance

4.4.3 The 'Renewable Energy' Supplementary Guidance ('SG') gives further advice and guidance relating to policy ED9 - Renewable Energy Developments as contained within the former LDP (2016). It covers a wide range of renewable energy types and references the former Scottish Planning Policy ('SPP') and Scottish Government advice setting out the need to accommodate renewable energy proposals where appropriate, whilst also taking cognisance of economic and other benefits a proposal may offer. It sets out a Spatial Framework for wind energy as contained in the former SPP.

4.4.4 The SG includes the 2016 Ironside Farrar Landscape Capacity and Cumulative Impact Study as Appendix C. ('The Scottish Borders Council Wind Energy Consultancy – Update of Wind Energy Landscape Capacity and Cumulative Impact Study') (the 'WELCS').

4.4.5 The WELCS aims to identify landscape and visual sensitivities relative to the consideration and determination of proposals for wind farm developments across the region.

4.4.6 The SG sets out that if turbines are proposed which exceed the turbine heights identified within the WELCS, the applicant will be required to demonstrate how the impacts of the proposal on the key constraints and any significant adverse effects can be mitigated.

4.4.7 The LVIA presented in the EIA Report and AEI Report addresses all relevant landscape and visual considerations and explains the design and siting approach followed and demonstrate that the revised proposed development can be satisfactorily accommodated in the landscape.

4.5 Development Plan: Conclusions

4.5.1 The environmental and topic considerations within the LDP (2024) policies are encompassed within the broad remit of NPF4 Policy 11 (Energy) Part e). Each of the relevant development management considerations have been addressed in the original Planning Statement and are not repeated.

4.5.2 Given the information set out in the AEI Report, and in particular the reduced landscape and visual impact of the revised proposed development, the conclusion remains that the proposal is in accordance with the relevant policies of NPF4 and when NPF4 is read as a whole.

4.5.3 Furthermore, the effects arising from the revised proposed development as updated in the AEI Report are considered to be acceptable in terms of the relevant policy provisions of the LDP and therefore the Development Plan overall.

5. Conclusions

5.1 The Climate Emergency & the Renewable Energy Policy Framework

5.1.1 The urgent need for onshore wind has been set out: a large increase in the deployment of this renewable energy technology is supported through a number of policy documents and by Scottish Government commitments – most recently expressed in the OWPS and in NPF4.

5.1.2 Onshore wind was already viewed and described as "*vital*" to the attainment of targets in 2017. This imperative has only increased since a "*climate emergency*" was declared by the Scottish First Minister in April 2019, in line with the recommendations made by the CCC (2019) 'net zero' publication[6]. Furthermore, the drive to attain net zero emissions is now legally binding at the UK and Scottish Government levels by way of amendments to the 2008 Act and in Scotland through the provisions of the Climate Change (Scotland) Act 2009 and the Climate Change (Emissions Reduction Targets) (Scotland) Act 2019 as amended.

5.1.3 Achieving net zero is a legal requirement, and the Scottish Government has recognised, in the OWPS, that a very substantial quantity of new onshore wind is required to meet the onshore wind target requirement by 2030 – namely a minimum of 20 GW of operational capacity. Deployment of more onshore wind is described as being "*mission critical for meeting our climate targets*" in the OWPS.

5.1.4 As explained in Chapter 2, the CCC has stated (June 2024) that the deployment of low carbon technology needs to significantly ramp up. In this regard in terms of renewable technologies the CCC has stated that onshore wind installations will need to double by 2030, and a higher figure is estimated in relation to renewable deployment capacity needed to achieve the Seventh Carbon Budget published in May 2025. The new Labour Government has accepted the advice of the CCC and has committed to a 30 GW onshore wind target for the UK as set out in the recently published Clean Power Action Plan.

5.1.5 The important benefits of the revised proposed development have been set out in the context of the current climate emergency, and they would help address the issue of climate change and very challenging net zero targets and contribute to improving security of supply.

5.2 The Planning Balance

5.2.1 In NPF4 there is a clear recognition that climate change must become a primary guiding principle for all plans and decisions. Significant weight is to be given to the climate emergency and the contribution of individual developments to tackling climate change.

5.2.2 The revised OWPS was published in December 2022. NPF4 came into force on 13 February 2023. Both are up to date statements of Scottish Government policy, directly applicable to determination of this application. Both should be afforded very considerable weight in decision-making.

5.2.3 NPF4 and the OWPS are unambiguous as regards the policy imperative to combat climate change, the crucial role of further onshore wind in doing so, and the scale and urgency of onshore wind deployment required. As described in this Statement:

> The global climate emergency and the nature crisis are the foundations for the NPF4 Spatial Strategy as a whole. The twin global climate and nature crises are "*at the heart of our vision for a future Scotland*" so that "*the decisions we make today will be in the long-term interest of our country*"[7]. The policy position, and the priority afforded to combatting the climate emergency, is different to that which was set out in the former NPF3 and SPP;

[6] CCC, Net Zero, The UK's contribution to stopping global warming (May, 2019).
[7] NPF4, page 2.

- NPF4 Policy 1 (Tackling the climate and nature crises) directs decision-makers to give significant weight to the global climate emergency in all decisions. This is a radical departure from the usual approach to policy and weight and clearly denotes a step change in planning policy response to climate change. The matter of weight is no longer left entirely to the discretion of the decision maker; and
- Both NPF4 and the OWPS are clear that further onshore wind development, of scale and utilising modern, larger turbines, has a crucial role in combatting climate change, transitioning to a net zero Scotland and ensuring security of energy supply. NPF4 Policy 11 (Energy) strongly supports proposals for all forms of renewable, low-carbon and zero emissions technologies, including onshore wind farms.

5.2.4 It is important to fully recognise both the scale and urgency of the challenge set out in these documents, and the required response from decision-makers. NPF4 is clear that significant progress must be made by 2030 requiring, as set out in the OWPS, that "*we must now go further and faster than before. We expect the next decade to see a substantial increase in demand for electricity to support net zero delivery across all sectors, including heat, transport and industrial processes*"[8].

5.2.5 Publication of the OWPS followed and cross-refers to NPF4 and, for the first time, sets an onshore wind target: a Scottish Government ambition for a minimum of 20 GW of installed onshore wind capacity by 2030. New policy therefore supports an increase in the installed capacity of onshore wind in Scotland by a minimum amount equivalent to about 130% of the entire installed capacity of all current operational onshore wind farms in Scotland in a period of around five years. This is also embedded in the Scottish Government's consultative draft Energy Strategy and Just Transition Plan, together with the commitment to "*place the climate and nature at the centre of our planning system*"[9] (original emphasis) in line with the NPF4.

5.2.6 As the Statement of Need for Strategic Renewable Electricity Generation and Transmission Infrastructure explains[10] "*A large and rapid increase in electricity generation from renewable sources will be essential for Scotland to meet its net zero emissions targets*."

5.2.7 Other policy support for development of wind farms is found in NPF4 and the OWPS:

- In addition to the cross-cutting NPF4 Policy 1, NPF Policy 11 (Energy) directs that in considering the identified impacts of an onshore wind proposal significant weight will be placed on the contribution of the proposal to renewable energy generation targets and on greenhouse gas emissions reduction targets.
- The OWPS expressly recognises that meeting the ambition of a minimum installed capacity of 20 GW of onshore wind in Scotland by 2030 will require taller and more efficient turbines and that "*this will change the landscape".*
- NPF4 Policy 11 confirms that significant landscape and visual impacts are to be expected for some forms of renewable energy. Scottish Government policy, which forms part of the Development Plan, is that where such impacts are localised and / or appropriate design mitigation has been applied, they will generally be considered to be acceptable. Notably, policy recognises that significant landscape and visual effects are inevitable and generally acceptable. The changes made to the layout further demonstrate that appropriate design mitigation has been applied.
- NPF4 Policy 4 provides in principle support for wind farm development in all locations with the exception of National Parks and NSAs, unless the conditions in NPF4 Policy 4 c) are met.

[8] OWPS 2022, paragraph 1.1.2.
[9] Energy Strategy and Just Transition Plan, page 55
[10] NPF4, page 103.

- NPF4, Policy 4, Part d) specifically relates to a proposed development that may adversely affect the integrity of a local landscape designation. It provides that development will be supported where significant adverse effects on the integrity of the area are clearly outweighed by social, environmental or economic benefits of at least local importance. There would be no adverse impacts on the integrity of a local landscape designation – LLAs in this case.

5.2.8 The applicant has gone to considerable lengths to ensure a satisfactory layout, design and composition for the revised proposed development through substantial design changes. In short, appropriate design mitigation has been applied. Potentially significant adverse landscape and visual effects, and effects in relation to heritage assets resulting from the original proposed development, have been addressed through an iterative design process (i.e. 'mitigation by design') and a well-considered revised proposed development has been established, which has acceptable effects.

5.2.9 NPF4 and the OWPS require that the decision-maker must also identify and weigh the adverse effects of a proposed development. However, increased weight is to be given to the benefits of a proposed development in the planning balance owing to the seriousness and importance of energy policy related considerations and the contribution of the revised proposeddevelopment in meeting climate change targets.

5.2.10 It is considered that this approach is very clearly reflected and articulated in NPF4 and the OWPS (subject to Scottish Government policy now expressly stating that significant weight will be given to the global climate and nature crises and a proposed development's contribution towards meeting targets). Moreover, Section 3.6 of the OWPS states that the criteria for assessing proposals (in NPF4) have been updated "*including* ***stronger weight*** *being afforded to the contribution of the development to the climate emergency*".

5.2.11 NPF4 has not altered the requirement to undertake a balancing exercise and to consider the adverse impacts of a development proposal; but the relative weight to be ascribed to the benefits of a renewable development and its residual adverse effects has changed with NPF4.

5.2.12 It is considered that there is nothing unusual about the visual effects which would arise from the revised proposed development. The overall design approach involves balancing many environmental, technical, planning, and economic constraints and opportunities. Some constraints cannot be reconciled and must give way to others. In the real world the layout of a wind farm must strike an always difficult but essential balance. Good design encompasses functionality and viability as well as appearance. In this case the applicant has responded to specific issues raised by consultees, in particular HES, and had amended the original proposed development to address the specific issues raised.

5.2.13 Furthermore, the effects that would arise on landscape character and in relation to other visual receptors would be largely localised. This position is reinforced by calibration of how the term localised has been applied in other decisions, including those of the Scottish Ministers. The term "*generally acceptable*" in NPF4 does not mean acceptable in every case. However, it is not considered that there are receptors affected by the revised proposed development are such that it should be deemed unacceptable.

5.2.14 In this case, the revised proposed development has a capacity over 50 MW and is a development of national importance that will help to deliver the national Spatial Strategy set out in NPF4. The revised proposed development would make a substantial and valuable contribution to help Scotland, and the UK attain Net Zero, security of supply and related socio-economic objectives. It is submitted that very substantial weight should be given to this contribution when weighing the need for the revised proposed development and its identified effects within the planning balance.

5.2.15 The revised proposed development is considered to be in accordance with the relevant policies of the NPF4, the new LDP and the related Supplementary Guidance.

5.2.16 The limited effects of the revised proposed development, including how relevant effects listed in NPF4 Policy 11(e) have been addressed, is detailed in the supporting information to the application. In terms of Policy 11, in considering the identified impacts of the revised proposed development, significant weight must be placed on its nationally important contribution to renewable energy generation and greenhouse gas emissions reduction targets.

5.3 Overall Conclusion

5.3.1 The policy set out in NPF4 and the OWPS requires a rebalancing of the consenting of onshore wind developments in response to the challenges of tackling the climate and nature crises. Having regard to the weight to be ascribed to the nationally important benefits of the revised proposed development, it is considered that the benefits of the revised proposed development clearly outweigh its adverse effects.

5.3.2 The up-to-date policy set out in NPF4 and the OWPS and the policy being consulted upon in the draft Energy Strategy provide strong and increased support for the grant of consent for the revised proposed development.

5.3.3 The conclusion is that the revised proposed development would be consistent with all relevant policies of NPF4, and with the Development Plan when read as a whole insofar as that is a relevant matter in a Section 36 application.

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