

RWE

Clachaig Glen Wind Farm

Environmental Impact Assessment Report

Volume 2a

Main Report

Chapter 6: Planning and Energy Policy Context

6. Planning and Energy Policy Context

6.1 Introduction

- 6.1.1 This chapter of the Environmental Impact Assessment Report (EIAR) provides a summary of the overarching planning policies and advice that are regarded as relevant to the Clachaig Glen Wind Farm ('the Proposed Development'), as described in Chapter 3 of this EIAR: Project Description. Where considered necessary, policies relating to individual disciplines are examined in more detail within the relevant EIAR technical chapters.
- 6.1.2 The Clachaig Glen Wind Farm Planning Statement provides an overall assessment of the Proposed Development against relevant national and local policy. As the Planning Statement has been prepared for a Section 36 Application under the Electricity Act 1989, the Development Plan forms a relevant consideration but does not have primacy as it would if Section 25(1) of the Town and Country Planning (Scotland) Act 1997 (as amended) was engaged.
- 6.1.3 The planning system plays a key role in promoting sustainable development, facilitating climate change mitigation and adaptation, and in protecting and improving the natural and built environments, amenity, and public health and safety. This chapter aims to summarise the national guidance and advice and local development plan policies (including adopted and emerging development plan policies) that are relevant to the Proposed Development.
- 6.1.4 The reviewed policy documents make continued reference to the issues surrounding climate change and greenhouse gas emissions – one of the biggest drivers for renewable energy projects worldwide. This can be traced through a series of conventions, directives and policy statements over many decades going back to and including the Kyoto Earth Summit, EU directives on renewable energy targets and the UK-specific Stern Review. However, more recent policy statements, including the Scottish Government's and UK Parliament's 'climate emergency' declarations, confirm the need for action is now urgent. The requirement for cleaner energy generation, for a secure energy supply, and to positively impact on climate change is both urgent and central to the need for renewable energy in Scotland and the UK.

6.2 Methodology

- 6.2.1 This chapter identifies and summarises relevant policies which provide a useful context for the Environmental Impact Assessment (EIA). For example, it identifies planning policies which help to determine the sensitivity of the environment and receptors.
- 6.2.2 National and local planning policies and strategies applicable to the Proposed Development have been identified via a review of documents and consultations with Argyll and Bute Council and other statutory consultees.

6.2.3 The policies and plans which will be considered as part of the assessment are outlined below. These policies and plans reflect the current direction of the government objectives for accommodating wind turbine development.

6.3 National Targets

6.3.1 A summary of the key Scottish and UK policy is provided in Table 6-1.

6.3.2 Key targets support goals set out in the Climate Change (Scotland) Act 2009, as amended by the Climate Change (Emissions Reduction Targets) (Scotland) Act 2019. This sets targets to reduce Scotland's emissions of all greenhouse gases from all sources to net zero by 2045 at the latest, with interim targets for reductions of at least 56% by 2020, 75% by 2030, and 90% by 2040. There must now be a 100% reduction of greenhouse gases emissions in Scotland below 1990 levels by 2045 to adhere with Climate Change (Scotland) Act 2009.

6.3.3 As a result, the Scottish Government published an updated Climate Change Plan (CCP) in December 2020 (Scottish Government, 2020a) to reflect the increased ambition of the new targets. This emphasises the need to move from a low to zero carbon electricity system and highlights planning as a “critical enabler of rapid renewables deployment in Scotland.” A number of renewable technologies are referenced in the CCP, including the continuing support for onshore wind.

Table 6-1 Key UK and Scotland Climate Change and Energy Policy

Policy	Year	Summary and Targets
Reducing emissions in Scotland – 2020 Progress Report to Parliament	2020	This annual Progress Report to the Scottish Parliament, required under the Climate Change (Scotland) Act 2009, assesses Scotland’s overall progress in achieving its legislated targets to reduce greenhouse gas emissions. The report shows that Scotland’s greenhouse gas emissions fell by 31% from 2008 to 2018. This was primarily due to action to reduce emissions in the power sector, where Scottish renewable electricity generation has tripled and fossil-fuelled generation has fallen by more than 70% in the last decade. However, greenhouse gas emissions increased by 2% in 2018, compared to a reduction of 3% in 2017. The report outlines a number of priority areas for the Scottish Government, including the delivery of an updated CCP to facilitate Scotland’s transition to a ‘Net Zero economy’ by 2045. One of the key policy priority areas: ‘Embedding Net Zero and adaptation as core Scottish Government objectives’, makes direct reference to onshore wind: <i>“Align the National Planning Framework (NPF4) to a net-zero energy system – enforcing a favourable planning and consenting scheme for onshore wind and other renewables in manner that is consistent with other policies on land use, supporting repowering and life extension of existing wind power in Scotland”.</i>
Net Zero: The UK’s Contribution to Stopping Global Warming	2019	The Committee on Climate Change (CCC) commissioned by the Governments of the UK, Scotland and Wales published this report which concluded that achieving net zero greenhouse gas emissions across the UK (as opposed to the previous 80% reduction) by 2050 is “ <i>necessary, feasible and cost-effective</i> ”. It recommended that the UK should legislate as soon as possible for net zero emissions and recommended that Scotland should set a net zero target for 2045.

Policy	Year	Summary and Targets
The Scottish Government's Programme for Scotland 2019-2020 'Protecting Scotland's Future'	2019	<p><i>Protecting Scotland's Future: the Government's Programme for Scotland 2019-2020</i> is the legislative programme of the Scottish Government which establishes key actions for the following year. Following the First Minister's April 2019 declaration of a 'Climate Emergency' in Scotland, this programme was produced to establish immediate steps on the route to net zero emissions.</p> <p>In responding to a request from the Climate Emergency Response Group, the programme confirms that the Scottish Government's next Energy Statement will set out the extent to which renewable and low carbon energy generation will need to be combined in order to achieve net zero. It was intended that this would ultimately form part of a wider review of targets and policies to inform the updated CCP, which was ultimately published in 2020. The CCP is discussed below.</p>
The Scottish Climate Change Plan	2020	<p>The current CCP is its fourth iteration and establishes a vision for 2045 that aligns with the increased ambition of the new targets established by the Climate Change (Emissions Reduction Targets) (Scotland) Act 2019. The CCP vision adds detail to the 2045 net zero target, stating: "<i>Crucially, we will have reached net zero in a way that is fair and just to all and involves people and communities... Scotland will continue to be seen as a world leader in climate change mitigation and our low carbon technologies, processes and services mean we'll have been able to attract skills and investment from all over the globe</i>". The CCP retains the commitment of the previous plan to have reached a point where 50% of all Scotland's energy needs will be generated from renewable sources by 2030. It states that during this period the development of between 11 and 16 gigawatts of renewable capacity is expected.</p> <p>The role of onshore wind in this is addressed directly, with the CCP anticipating a "<i>substantial increase in renewable generation, particularly through new offshore and onshore wind capacity.</i>"</p>
The Scottish Energy Strategy: The Future of Energy in Scotland	2017	<p>The Scottish Energy Strategy sets out the Scottish Government's vision for the future energy system in Scotland until 2050: "<i>a flourishing, competitive local and national energy sector, delivering secure, affordable, clean energy for Scotland's households, communities and businesses.</i>"</p> <p>The Strategy sets two new targets for the Scottish energy system by 2030:</p> <ul style="list-style-type: none"> • The equivalent of 50% of the energy for Scotland's heat, transport and electricity consumption to be supplied from renewable sources, and • An increase by 30% in the productivity of energy use across the Scottish economy. <p>Onshore wind is recognised as a key opportunity: "<i>Onshore wind is now amongst the lowest cost forms of power generation of any kind, and is a vital component of the huge industrial opportunity that renewables create for Scotland. The sector supports an estimated 7,500 jobs in Scotland, and generated more than £3 billion in turnover in 2015</i>".</p> <p>The latest figures issued by the Scottish Government show that 21.3% of total energy (heat, transport and electricity) in 2018 was provided through renewable sources (Scottish Government 2020b).</p>
Scotland's Energy Strategy Position Statement	2021	<p>In March 2021, the Scottish Government published Scotland's Energy Strategy Position Statement to provide an overview of its key priorities for the short to medium-term. The 2017 Energy Strategy remains in place, however the statement provides an overview of the approach towards economic recovery from the COVID-19 pandemic in the context</p>

Policy	Year	Summary and Targets
		<p>of national net zero ambitions in the lead up to the UN Climate Change Conference (COP26) in November 2021.</p> <p>With regard to onshore wind, the statement identifies the update of the Onshore Wind Policy Statement (2017) as a priority and affirms that the Scottish Government is “committed to supporting the increase of onshore wind in the right places to help meet the target of Net Zero”.</p>
Onshore Wind Policy Statement	2017	<p>The Onshore Wind Policy Statement was published alongside the Scottish Energy Strategy and further emphasises the role of the onshore wind sector in contributing to the Scottish Economy, and to the national targets for the generation of energy from low carbon technologies.</p> <p>The Ministerial Foreword sets out that “<i>There is no question that onshore wind is a vital component of the huge industrial opportunity that renewables more generally create for Scotland... Our energy and climate change goals mean that onshore wind will continue to play a vital role in Scotland’s future... This important role means we must support development in the right places, and – increasingly – the extension and replacement of existing sites, where acceptable, with new and larger turbines, based on an appropriate, case by case assessment of their effects and impacts</i>”.</p>

6.4 National Planning Policy Context

Overview

6.4.1 In the case of relevant material considerations, there are legal, policy and advice documents including:

- National Planning Framework 3 (NPF3),
- Scottish Planning Policy (SPP),
- Draft National Planning Framework 4 (NPF4),
- Planning Advice Notes (PANs),
- Specific Advice Sheets including “Onshore wind turbines” (updated May 2014), and
- Planning, Energy and Climate Change Acts and Bills.

National Planning Framework 3

6.4.2 The NPF3, published in June 2014, provides a framework for Scotland’s long-term spatial development. It sets out the Scottish Government’s spatial development priorities for 20 to 30 years following publication and represents a clear vision of what is expected of the planning system and outcomes that it must deliver for the people of Scotland. Planning authorities must have regard to NPF3 when preparing development plans. Whilst it is not prescriptive, NPF3 forms a material consideration when determining the applications for new wind energy developments.

- 6.4.3 The NPF3 vision divides the framework into four outcomes that NPF3 seeks to achieve. Within each outcome the current status is outlined, and the vision for the future and the priorities for achieving the outcome are provided. The outcomes are as follows:
- A successful sustainable place,
 - A low carbon place,
 - A natural resilient place, and
 - A connected place.
- 6.4.4 Specific reference is given to the energy sector as one of seven sectors to accelerate economic recovery. Support is also given for emerging technologies in renewable energy. It is also noted that development will need to facilitate adaptation to climate change, reduce resource consumption, and lower greenhouse gas emissions.
- 6.4.5 NPF3 recognised that (at the time of publication) the Scottish Government had set a target of at least an 80% reduction in greenhouse gas emissions by 2050. It is expected that strategic and local development plans will take into account the strategy, actions and developments set out in NPF3.
- 6.4.6 Reference to onshore wind is included within the 'A Low Carbon Place' outcome within the policy document. Key points emerging from NPF3 include:
- Paragraphs 3.1 to 3.6, which discuss how planning will play a key role in delivering on the commitments set out in Low Carbon Scotland. The priorities identified in this spatial strategy set a clear direction, consistent with the climate change legislation. Currently the energy sector accounts for a significant share of greenhouse gas emissions. To address this issue, the Scottish Government will encourage electricity generation from renewable energy sources, including onshore wind,
 - Paragraph 3.7, which confirms support for onshore wind energy but notes that development should avoid internationally and nationally protected areas. It is also recognised that there is strong public support for wind energy but opinions about onshore wind in particular areas can vary. In some places concern is expressed about the scale, proximity and impacts of proposed wind developments. In other places they are recognised as an opportunity to improve the long-term resilience of rural communities,
 - Paragraph 3.8, which sets out targets for renewable energy generation. It was the aim of the Scottish Government to reduce total energy demand by 12% by 2020. In order to do this NPF3 recognised the energy supply would need to diversify. It was also an aim to meet at least 30% of overall energy demand from renewable energy by 2020, which included generating at least 100% of gross electricity consumption from renewables, with an interim target of 50% by 2015. It should be noted that since publication of NPF3, the Scottish Government has revised its aim to meet at least 50% of overall energy demand from renewables by 2030 as discussed previously in the context of the Scottish Climate Change Plan (2020). Progress towards electricity consumption targets has been made and is referenced in Table 6-1 above,

- Paragraph 3.9, which clarifies that Scotland will continue to capitalise on wind resources as part of the push to diversify Scotland's energy generation capacity. In particular, it is desired that Scotland becomes a world leader in offshore renewable energy. In time, it is expected that the pace of onshore wind energy development will be overtaken by marine energy opportunities, and
- Paragraph 3.23, which reiterates that onshore wind will continue to make a significant contribution to diversification of energy supplies, although wind development is not desirable in National Parks or National Scenic Areas. It also points to spatial frameworks which are to be prepared in line with the SPP to guide new wind energy developments to appropriate locations.

6.4.7 Thirty key actions are identified, which are meant to ensure the delivery of the framework and help the Scottish Government achieve its targets. Relevant key actions include:

- Continuing to take action to help generate the equivalent of 100% of Scotland's gross annual electricity consumption from renewable energy sources by 2020, with an interim target of 50% by 2015, and
- Taking forward the actions in the Climate Change Adaptation programme.

6.4.8 Electricity generated by renewables was estimated to be the equivalent to approximately 98.6% of Scotland's gross electricity consumption in 2020 (Scottish Government, 2021b), with wind generating 60.2% of this. While this falls short of the 100% 2020 target, the Scottish Government describe the current progress as important groundwork towards realising the more ambitious target of net zero by 2045 (Scottish Government, 2021b).

Scottish Planning Policy (SPP)

6.4.9 SPP was published in June 2014; its purpose is to set out national planning policies that reflect priorities of the Scottish Ministers for operation of the planning system and the development and use of land through sustainable economic growth. The SPP aims to promote a planning process that is consistent across Scotland but flexible enough to accommodate local circumstances. It demonstrates a commitment to sustainable growth through a balance of development in the appropriate places.

6.4.10 In particular the SPP relates to:

- The preparation of development plans,
- The design of development, from initial concept through to delivery, and
- The determination of planning applications and appeals.

6.4.11 NPF3 and the SPP share a single vision for the planning system in Scotland. A key overarching policy of both the NPF3 and SPP is that a presumption in favour of development that contributes to sustainable development will be given when considering planning applications. This vision is supported by four planning outcomes that are consistent between NPF3 and SPP (see Paragraph 6.4.3 of this EIAR). The Subject Planning Policies each fall under one of the four planning outcomes.

Development plans and new development need to contribute to achieving these outcomes for planning to make a positive difference.

6.4.12 Onshore Wind is referred to specifically in paragraphs 161 to 166 (development planning considerations) and paragraphs 169 to 174 (development management considerations) of the SPP within the 'A Low Carbon Place' outcome. Development planning guidance for onshore wind includes reference to the need for planning authorities to set out in their development plans a spatial framework identifying those areas that are likely to be most appropriate for onshore wind farms. Table 1 in SPP provides guidance on how spatial frameworks should be set out. They should identify three types of areas including:

- Group 1: Areas where wind farms will not be acceptable (i.e. National Parks and National Scenic Areas),
- Group 2: Areas of significant protection (e.g. national and international designations, nationally important environmental interests, community separation for considering visual impact), and
- Group 3: Areas with potential for wind farm development (where wind farms are likely to be acceptable subject to consideration of details).

6.4.13 Beyond the spatial framework for wind farms, the following considerations should be taken into account (where applicable) when determining development proposals:

- Net economic impact,
- Scale of contribution to renewable energy generation targets,
- Effect on greenhouse gas emissions,
- Cumulative impacts,
- Impact on communities and dwellings (visual impact, residential amenity, noise and shadow flicker),
- Landscape and visual impacts (including wild land),
- Effect on natural heritage (including birds),
- Impacts on carbon rich soils (using carbon calculator),
- Impact on public access (long distance walking and cycling routes, scenic routes),
- Impacts on the historic environment (scheduled monuments, listed buildings and their setting),
- Impacts on tourism and recreation,
- Impacts on aviation and defence interests and seismological recording,
- Impacts on telecommunications and broadcasting installations,
- Impacts on transportation (road traffic and adjacent trunk roads),
- Effects on hydrology (water environment and flood risk),
- Opportunities for energy storage, and

- Conditions relating to decommissioning of development, including ancillary infrastructure and site restoration.

6.4.14 SPP also states that moratoria on onshore wind development are not appropriate.

Draft National Planning Framework 4

6.4.15 The preparation of NPF4 has begun, with a draft published in November 2021 and final version expected for adoption in 2022 following Scottish Ministers approval. On adoption, it will replace NPF3 and SPP.

6.4.16 The Ministerial Foreword of the draft identifies that the central purpose of NPF4 is to align with and ensure planning policy is oriented towards the delivery of Scotland's national emissions targets: "*our fourth National Planning Framework, sets out how our approach to planning and development will help to achieve a net zero, sustainable Scotland by 2045*" (Scottish Government, 2021c, p. 2). NPF4 will be part of a wider package to deliver the reform envisaged by the Planning (Scotland) Act 2019.

6.4.17 Part 1 of the draft identifies 'action areas' as part of the overarching spatial strategy of NPF4, with priorities established for each area. The western coastline of Kintyre falls within the 'north and west coast innovation' area. The draft NPF4 explains the importance of the area: "*Scotland's north and west coast and islands will be at the forefront of our efforts to reach net zero emissions by 2045... as one of the most renewable energy rich localities in Europe with significant natural resources, there is a real opportunity for this part of Scotland to support our shared national outcomes.*" (p. 12). The role of renewables in the 'north and west coastal innovation' area is further emphasised through the 'Support the Blue and Wellbeing Economies' action: "*To significantly reduce greenhouse gas emissions more renewable energy generation will be needed, bringing unprecedented opportunities to strengthen local economies, build community wealth and secure long-term sustainability.*" (p. 16).

6.4.18 Part 2 of the draft details the proposed 'national developments' that will support the delivery of the wider NPF4 spatial strategy. National development 12, 'Strategic Renewable Electricity Generation and Transmission Infrastructure', confers national development status on all renewable electricity generating stations with a capacity of 50MW or more. Page 59 explains that a "*large increase in electricity generation from renewable sources will be essential for Scotland to meet its net zero emissions targets.*". The 'need' for national development 12 is explicitly stated:

"Need - Additional electricity generation from renewables and electricity transmission capacity of scale is fundamental to achieving a net zero economy and supports improved network resilience in rural and island areas." (p. 59).

6.4.19 Part 3 of the draft NPF4 sets out policies for the development and use of land, to be used by planning authorities in development plan production and in development management decisions. The proposed 'Policy 2: Climate Emergency' states that when considering all development proposals, significant weight should be given to the Global Climate Emergency.

- 6.4.20 Policy 2 (c) notes that *“In decision making the scale of the contribution of development proposals to emissions in relation to emissions reduction targets should be taken into account”*. (p. 69).
- 6.4.21 The introductory text of the proposed ‘Policy 19: Green Energy’ identifies the significance of the energy sector in contributing towards emissions reduction, and in the delivery of a *“green, fair and resilient economic recovery”* (p. 90). While the policy expresses support for renewable energy development generally in delivering these benefits, onshore wind in particular is placed in a unique position: *“it is likely that the onshore wind sector will play the greatest role in the coming years. The planning system should support all forms of renewable energy development and energy storage...”* (p. 90). The use of energy storage is introduced here and forms part of proposed Policy 19 (b) which provides support in principle for renewable energy development proposals together with *“energy storage such as battery storage”* (p. 90).
- 6.4.22 The proposed Policy 19 (a) directs planning authorities to prepare local development plans that *“seek to ensure that an area’s full potential for electricity and heat from renewable sources is achieved.”* (p. 90). The proposed Policy 19 (a) then states opportunities for repowering and extending existing renewables, alongside new development, should be supported. Support for repowering, extending, and expanding existing wind farms is also the direct focus of proposed Policy 19 (e).
- 6.4.23 The proposed Policy 19 (g) refers to those sites with extant wind farm consents: *“Areas identified for wind farms should be suitable for use in perpetuity. Consents may be time-limited but wind farms should nevertheless be sited and designed to ensure impacts are minimised and to protect an acceptable level of amenity for adjacent communities”* (p. 90).

Planning Advice Notes and Specific Advice Sheets

- 6.4.24 Planning Advice Notes (PANs) and Specific Advice Sheets set out detailed advice from the Scottish Government in relation to a number of planning issues. Relevant PANs and Specific Advice Sheets relevant to the Proposed Development are summarised in Table 6-2.

Table 6-2 Relevant PANs and Specific Advice Notes

Title	Summary of Document
PAN 1/2013 Environmental Impact Assessment	Provides information on the legislative background, details regarding the EIA process, and how Environmental Statements (now ‘EIARs’) are evaluated by relevant bodies for a planning decision.
PAN 68 Design Statements (2008)	This PAN recognises the importance of providing and promoting effective links between planning and design. It encourages developers to consider and set out the design principles which determine the design and layout of the development proposal.
PAN 51 Planning, Environmental Protection and Regulation (Revised 2006)	Details the role of the planning system in relation to the environmental protection regimes.
Online Planning Advice on Flood Risk (June 2015)	Provides advice on the role of the planning system and the assessment and management of flood risk.

Title	Summary of Document
PAN 60 Planning for Natural Heritage (2008)	Advises developers on the importance of discussing their proposals with the planning authority and Scottish Natural Heritage (SNH) and use of the EIA process to identify the environmental effects of development proposals and seek to prevent, reduce and offset any adverse effects in ecology and biodiversity.
PAN 75 Planning for Transport (2005)	The objective of PAN 75 is to integrate development plans and transport strategies to optimise opportunities for sustainable development and create successful transport outcomes.
PAN 3/2010 Community Engagement	This document provides advice on how to engage with local communities through the planning process.
PAN 1/2011 Planning and Noise	This PAN provides advice on the role of the planning system in helping to prevent and/ or mitigate any potential adverse effects of noise. It promotes the principles of good acoustic design and promotes a sensitive approach to the location of new development.
PAN 2/2011 Planning and Archaeology	The PAN is intended to inform local authorities and other organisations of how to process any archaeological scope of works within the planning process.
Online Renewables Planning Advice - On Shore Wind Turbines (Updated May 2014)	This Specific Advice Sheet outlines opportunities within the planning process to consider onshore wind, including its incorporation in relevant planning policies. The advice includes monitoring the location of wind farms / turbines in the localised area and any localised impacts they may have. The document also includes technical information on wind turbines and advises local authorities on what to consider when determining a planning application.
Online Renewables Planning Advice - Wind Farm Developments on Peat Land (2013)	This Specific Advice Sheet provides an overview of the use of the carbon calculator in estimating the carbon savings resulting from wind farm developments.

The Scottish Forestry Strategy 2019-2029

- 6.4.25 This document sets out a framework for taking forestry forward in a sustainable manner. The framework comprises core principles based on sustainable development and social inclusion with the overall aim of delivering well managed forests which integrate with other land uses, businesses and local communities.
- 6.4.26 The Strategy is clear in outlining the business development economic potential of the National Forest Estate. This includes the role of woodlands as locations for a broad range of appropriate renewable energy projects, as part of the forestry sector's contribution to addressing climate change.
- 6.4.27 In relation to forestry the Strategy aims to increase the woodland cover in Scotland from 18% to 21% by 2032.

Policy on Control of Woodland Removal

- 6.4.28 This policy sets out the strategic framework for appropriate woodland removal in Scotland, with the objectives of supporting and expanding forest cover in Scotland whilst mitigating and adapting to climate change.
- 6.4.29 Further guidance was published in 2019 to aid Scottish Forestry staff in achieving the objectives of this policy. The guidance provides in depth details of what Scottish Forestry expects to see within an EIAR and also more information on compensatory planting.

6.5 Local Planning Policy Context

Argyll and Bute Local Development Plan

- 6.5.1 The Argyll and Bute Local Development Plan (LDP) comprises a Written Statement and a Proposals Map. The LDP was formally adopted on 26 March 2015 and includes eleven overarching policies.
- 6.5.2 Policies relevant to the Proposed Development within the Local Development Plan are outlined in Table 6-3 below.
- 6.5.3 Argyll and Bute Council has also prepared Supplementary Guidance which sets out additional detailed policies against which development proposals will be assessed in relation to their environmental impacts. The Argyll and Bute Local Development Plan Supplementary Guidance was published in March 2016. Supplementary Guidance 2, which covers coastal development, piers and harbours, aquaculture and renewable energy, was adopted in December 2016. Relevant policies in relation to the Proposed Development are set out within Table 6-3 and each technical chapter of the EIAR.

Argyll and Bute Proposed Local Development Plan 2

- 6.5.4 Argyll and Bute Council is currently in the process of preparing their new Local Development Plan (LDP2). Consultation on this has ended and the next stage will be examination. The LDP2 was planned to be adopted in January 2022, based on an examination period spanning April to October 2021. However, it is understood that as examination has yet to commence, adoption of LDP2 will likely be delayed to January 2023. As LDP2 is still to be examined, the adopted LDP remains the primary policy consideration. A comparison of the key policies from the LDP and LDP2 has been provided in Table 6-4.

Argyll and Bute Indicative Regional Spatial Strategy

- 6.5.5 To support the preparation of NPF4, Argyll and Bute Council has prepared a draft Indicative Regional Spatial Strategy (IRSS) (September 2020) at the request of the Scottish Government. Regional Spatial Strategies (RSS) have been introduced as a requirement under the Planning (Scotland) Act

2019 and will represent long-term spatial strategies identifying strategic development need, priorities, locations and outcomes within a region.

- 6.5.6 RSS will not form part of the statutory development plan but planning authorities must have regard to them when preparing their local development plan. It should be noted that the IRSS such as that produced by Argyll and Bute Council are being prepared on a voluntary basis to inform NPF4 only and do not constitute formal RSS under the Planning (Scotland) Act 2019.
- 6.5.7 The draft IRSS sets out the Council's ideas for how the region can grow and prosper in the period up to 2050, whilst also supporting the delivery of national priorities and outcomes. The importance and continuing delivery of renewable energy development within the area is a recurrent theme throughout the IRSS.
- 6.5.8 The IRSS recognises climate change mitigation and adaptation as one of the key contextual factors in delivering the Council's vision. The vision *"to 2030 and beyond is that Argyll and Bute is an economically diverse and successful area based on sustainable and low carbon development."* (p.4).
- 6.5.9 The IRSS recognises three major areas of growth potential within Argyll and Bute. The Development Site falls within the Western Seaboard area, where renewable energy is identified as a *"priority sector"*.

Argyll and Bute Council Woodland and Forestry Strategy

- 6.5.10 This policy document sets out the strategy of how the forestry can contribute to the economy, communities and the environment of the Argyll and Bute area and the role that Argyll and Bute can play in helping to achieve the Scottish Government's target of 25% woodland cover by 2050.

Argyll and Bute Landscape Wind Energy Capacity Study

- 6.5.11 The Argyll and Bute Landscape Wind Energy Capacity Study *"aims to inform both strategic planning for wind energy development and to provide guidance on the appraisal of individual wind farm and wind turbine proposals."* The study was first published in 2012 and then updated in 2017.

Argyll and Bute Renewable Energy Action Plan

- 6.5.12 Argyll and Bute has developed a Renewable Energy Action Plan to assist the authority in realising its vision for the development of renewable energy: *"Argyll and the Islands will be at the heart of renewable energy development in Scotland by taking full advantage of its unique and significant mix of indigenous renewable resources and maximising the opportunities for sustainable economic growth for the benefits of its communities and Scotland"*.

Table 6-3 Argyll and Bute Local Development Plan Policies Relevant to the Proposed Development

Policy Title	Summary of Policy
Policy LDP 6 – Supporting the Sustainable Growth of Renewables	<p>The Council will support renewable energy developments where these are consistent with the principles of sustainable development and it can be adequately demonstrated that there would be no unacceptable significant adverse effects, whether individual or cumulative, including on local communities, natural and historic environments, landscape character and visual amenity, and that the proposals would be compatible with adjacent land uses. A spatial framework for wind farms and wind turbine developments over 50 m high in line with Scottish Planning Policy has been prepared as Supplementary Guidance.</p> <p>This has identified:</p> <ul style="list-style-type: none"> • Areas where wind farms [with turbines over 50m] will not be acceptable [Group 1]. • Areas of significant protection [Group 2]. • Areas which may have potential for wind farm development [Group 3]. <p>All applications for wind turbine developments will be assessed against the following criteria:</p> <ul style="list-style-type: none"> • Net economic impact, including local and community socio-economic benefits such as employment, associated business and supply chain opportunities. • The scale of contribution to renewable energy generation targets. • Effect on greenhouse gas emissions. • Cumulative impacts arising from all of the considerations below. • Impacts on communities and individual dwellings, including visual impact, residential amenity, noise and shadow flicker. • Landscape and visual impacts, including effects on wild land. • Effects on the natural heritage, including birds. • Impacts on carbon rich soils, using the carbon calculator. • Public access, including impact on long distance walking and cycling routes and those scenic routes identified in the NPF. • Impacts on the historic environment, including scheduled monuments, listed buildings and their settings. • Impacts on tourism and recreation. • Impacts on aviation and defence interests and seismological recording. • Impacts on telecommunications and broadcasting installations, particularly ensuring that transmission links are not compromised. • Impacts on road traffic. • Impacts on adjacent trunk roads. • Effects on hydrology, the water environment and flood risk. • The need for conditions relating to the decommissioning of developments, including ancillary infrastructure, and site restoration. • Opportunities for energy storage.

Policy Title	Summary of Policy
	<ul style="list-style-type: none"> The need for a robust planning obligation to ensure that operators achieve site restoration. <p>Further information and detail on matters relating to the growth of renewables is provided within a spatial framework for onshore wind energy developments that has been provided in the Supplementary Guidance 2 (December 2016).</p>
Policy LDP STRAT1 – Sustainable Development	<p>In preparing new development proposals, developers should seek to demonstrate the following sustainable development principles, which the planning authority will also use in deciding whether or not to grant planning permission:</p> <ul style="list-style-type: none"> (a) Maximise the opportunity for local community benefit; (b) Make efficient use of vacant and/or derelict land including appropriate buildings; (c) Support existing communities and maximise the use of existing infrastructure and services; (d) Maximise the opportunities for sustainable forms of design including minimising waste, reducing our carbon footprint and increasing energy efficiency; (e) Avoid the use of locally important good quality agricultural land; (f) Utilise public transport corridors and active travel networks; (g) Avoid the loss of important recreational and amenity open space; (h) Conserve and enhance the natural and built environment and avoid significant adverse impacts on biodiversity, natural and built heritage resources; (i) Respect the landscape character of an area and the setting and character of settlements; (j) Avoid places with significant risk of flooding, tidal inundation, coastal erosion or ground instability; and (k) Avoid having significant adverse impacts on land, air and water environment.
Policy LDP DM1– Development within the Development Management Zones	<p>Encouragement shall be given to sustainable forms of development as follows:</p> <ul style="list-style-type: none"> (a) Within the Main Towns and Key Settlements up to and including large scale on appropriate sites. (b) Within the Key Rural Settlements up to and including medium scale on appropriate sites. (c) Within the Villages and Minor Settlements up to small scale on appropriate sites. (d) Within the Rural Opportunity Areas up to small scale on appropriate sites including the open countryside as well as small scale infill, rounding-off, redevelopment and change of use of existing buildings. In exceptional cases, up to and including large scale may be supported if this accords with an Area Capacity Evaluation (ACE). (e) Within the Countryside Zone up to small scale on appropriate infill, rounding off and redevelopment sites and changes of use of existing buildings. In exceptional cases development in the open countryside up to and including large scale may be supported on appropriate sites if this accords with an ACE. There is a presumption against development that seeks to extend an existing settlement into the Countryside Zone. (f) Within Very Sensitive Countryside encouragement will only be given to specific categories of development on appropriate sites. These comprise: <ul style="list-style-type: none"> (i) Renewable energy related development (ii) Telecommunication related development. (iii) Development directly supporting agricultural, aquaculture, nature conservation or other established activity.

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	<p>(iv) Small scale development.</p> <p>(g) Within the Greenbelt encouragement will only be given to very limited and specific categories of countryside based development. These comprise:</p> <p>(i) Agricultural-related development.</p> <p>(ii) Farm diversification – tourism and rural business related development (excluding dwelling houses) (iii) Outdoor sport and recreational development.</p> <p>(iv) Development required to manage and sustain the natural heritage and access resources of the Greenbelt.</p> <p>(v) Demolition and replacement of buildings and alterations or extensions of such buildings, including dwelling- houses, subject to no change of use occurring.</p> <p>(vi) Change of use of buildings to residential institutional use.</p>
<p>Policy LDP 3 – Supporting the Protection, Conservation and Enhancement of our Environment</p>	<p>In all development management zones, Argyll and Bute Council will assess applications for planning permission with the aim of protecting conserving and where possible enhancing the built, human and natural environment. A development proposal will not be supported when it:</p> <p>(a) Does not protect, conserve or where possible enhance biodiversity, geodiversity, soils and peat, woodland, green networks, wild land, water environment and the marine environment.</p> <p>(b) Does not protect, conserve or where possible enhance:</p> <p>(i) The established character and local distinctiveness of the landscape and seascape in terms of its location, scale, form and design; and</p> <p>(ii) The “Dark Skies” status of the Isle of Coll.</p> <p>(c) Does not protect, conserve or where possible enhance the established character of the built environment in terms of its location, scale, form and design.</p> <p>(d) Has not been ascertained that it will avoid adverse effects, including cumulative effects, on the integrity or special qualities of international or nationally designated natural and built environment sites. Further information and detail on matters relating to the natural environment, landscape, and the historic environment is provided in the Supplementary Guidance.</p> <p>(e) Has significant adverse effects, including cumulative effects, on the special qualities or integrity of locally designated natural and built environment sites.</p> <p>Where there is significant uncertainty concerning the potential impact of a proposed development on the built, human or natural environment, consideration will be given to the appropriate application of the precautionary principle, consistent with Scottish Planning Policy.</p> <p>Development proposals are also expected to be consistent with all other LDP policies and Supplementary Guidance where relevant. In particular, the following Supplementary Guidance provides details of the mechanisms for delivery of this policy.</p> <p><u>Natural Environment</u></p> <ul style="list-style-type: none"> • Supplementary Guidance LDP ENV 1 – Development Impact on Habitats, Species and Biodiversity (i.e. biological diversity). • Supplementary Guidance- Local Biodiversity Action Plan (LBAP). • Supplementary Guidance LDP ENV 2 – Development Impact on European Sites (see Proposals Maps).

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- Supplementary Guidance LDP ENV 3 – Management of European Sites (see Proposals Maps).
- Supplementary Guidance LDP ENV 4 – Development Impact on Sites of Special Scientific Interest (SSSIs) (see Proposals Maps).
- Supplementary Guidance LDP ENV 5 – Development Impact on Local Nature Conservation Sites (see Proposals Maps).
- Supplementary Guidance LDP ENV 6 – Development Impact on Trees/Woodland.
- Supplementary Guidance LDP ENV 7 – Water Quality and the Environment.
- Supplementary Guidance LDP ENV 8 – Protection and Enhancement of Green Networks (see Supplementary Guidance).
- Supplementary Guidance LDP ENV 9 – Development Impact on Areas of Wild Land (see Proposals Maps).
- Supplementary Guidance LDP ENV 10 – Geodiversity.
- Supplementary Guidance LDP ENV 11 – Protection of Soil and Peat Resources.

Landscape and Design

- Supplementary Guidance LDP ENV 12 – Development Impact on National Scenic Areas (NSAs) (see Proposals Maps).
- Supplementary Guidance LDP ENV 13 – Development Impact on Areas of Panoramic Quality (APQs) (see Proposals Maps).
- Supplementary Guidance LDP ENV 14 – Landscape.
- Supplementary Guidance LDP ACE 1 – Area Capacity Evaluation.

Historic Built Environment and Archaeology

- Supplementary Guidance LDP ENV 15 – Development Impact on Historic Gardens and Designed Landscapes (see Proposals Maps).
- Supplementary Guidance LDP ENV 16(a) – Development Impact on Listed Buildings.
- Supplementary Guidance LDP ENV 19 – Development Impact on Scheduled Ancient Monuments.
- Supplementary Guidance LDP ENV 20 – Development Impact on Sites of Archaeological Importance.
- A number of other heritage policies (Supplementary Guidance LDB ENV 16(b), Supplementary Guidance LDB ENV 17, Supplementary Guidance LDB ENV 18 and Supplementary Guidance LDB ENV 21) are included within the supplementary guidance but these policies are not relevant to the Proposed Development.

Policy LDP 5 –
Supporting the
Sustainable Growth
of our Economy

Argyll and Bute Council will support the development of new industry and business which helps deliver sustainable economic growth throughout our area by:

- Taking full account of the economic benefits of any proposed development;
- Ensuring that the different spatial needs and locational requirements of the various sectors and scales of business are able to be met within the context of the settlement and spatial strategy;
- Focussing regeneration activity and promoting environmental enhancement; and by

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Policy Title	Summary of Policy
Policy LDP 10 – Maximising our Resources and Reducing our Consumption	<ul style="list-style-type: none"> • Safeguarding existing industrial and business areas for employment uses. • Argyll and Bute Council will give particular priority to new business and industry development in our business allocations, established business and industry areas and economically fragile areas. <p>Further information and detail is provided in the Supplementary Guidance in relation to support for business and industry, including the main potential growth sectors of marine and coastal, tourism, renewables and forestry developments.</p> <hr/> <p>The Council will support all development proposals that seek to maximise our resources and reduce consumption and where these accord with the following:</p> <ul style="list-style-type: none"> • The settlement strategy; • Sustainable design principles; • Minimising waste and/or contributing to recycling; • Minimising the impact on the water environment both in terms of pollution and abstraction; • Avoiding areas subject to flood risk or erosion; • Minimising the impact on biodiversity and the natural environment; • Safeguarding our mineral resources and minimising the need for extraction; • Avoiding the loss of trees and woodland • Contributing to renewable energy generation; • Avoiding the disturbance of carbon rich soils; • Safeguarding our best agricultural land. <p>Further information and detail is provided in the Supplementary Guidance in relation to the following matters: resources and consumption; addressing climate change; minerals; renewable energy; and sustainable design.</p> <ul style="list-style-type: none"> • Policy LDP 10 is supported by the following relevant policies included in the Supplementary Guidance: <ul style="list-style-type: none"> – Supplementary Guidance LDP SERV 2 – Incorporation of Natural Features/Sustainable Drainage Systems (SuDS) – Supplementary Guidance LDP SERV 3 – Drainage Impact Assessment (DIA) – Supplementary Guidance LDP SERV 7 – Flooding and Land Erosion – The Risk Framework for Development – Supplementary Guidance LDP CC1 – Climate Change – Supplementary Guidance LDP MIN 2 – Mineral Extraction

6.5.13 A comparison of the key policies from the LDP and LDP2 has been provided in Table 6-4.

Table 6-4 Comparison of Relevant Policies within Adopted LDP and Proposed LDP2

Adopted LDP (2015)	Proposed LDP2 (2019)	Policy Transformation
Policy LDP STRAT 1 – Sustainable Development	Policy 04 – Sustainable Development	No policy change, wording remains the same.
Policy LDP DM 1 – Development within the Development Management Zones	Policy 02 – Outwith Settlement Areas	LDP2 identifies land outside of settlements as either ‘A – Countryside Areas’, or ‘B-Remote Countryside Areas’. Although more detailed, this is very similar to the ‘Rural Opportunity Areas’, the ‘Countryside Zone’ and ‘Very Sensitive Countryside’ areas identified within Policy LDP DM1.
Policy LDP 3 – Supporting the Protection, Conservation and Enhancement of our Environment	Policy 15 – Supporting the Protection, Conservation and Enhancement of Our Historic Built Environment; Policy 59 – Water Quality and The Environment Policy 73 – Development Impact on Habitats, Species and Biodiversity; Policy 74 – Development Impact on Sites of International Importance; Policy 75 – Development Impact on Sites of Special Scientific Interest (SSSIs) and National Nature Reserves; Policy 77 – Forestry, Woodland and Trees Policy 78 – Woodland Removal	LDP 3 and the Supplementary Guidance documents associated with it have been replaced by a large number of more specific policies within the proposed LDP, of which the key policies are listed here.
Policy LDP 4 – Supporting the Sustainable Development of our Coastal Zone	Policy 28 – Supporting Sustainable Aquatic and Coastal Development	Policy 28 provides a greater level of detail than Policy LDP 4.
Policy LDP 5 – Supporting the Sustainable Growth of our Economy	Policy 22 – Economic Development	Policy 22 serves the same function as LDP 5, however provides a detailed spatial framework which is intended to guide economic development to key locations.
Policy LDP 6 – Supporting the Sustainable Growth of Renewables	Policy 30 – The Sustainable Growth of Renewables	Although there are slight differences in the wording of the two policies, the relevance with regard to the Proposed Development remains unchanged.
Policy LDP 9 – Development Setting, Layout and Design	Policy 05 – Design and Placemaking	Policy 05 differs from LDP 9; however, the points of relevance to the Proposed Development remain similar.
Policy LDP 10 – Maximising our Resources and	N/A	N/A

Adopted LDP (2015)	Proposed LDP2 (2019)	Policy Transformation
Reducing our Consumption		
Policy LDP 11 – Improving our Connectivity and Infrastructure	Policy 32 – Active Travel Policies 35 – 39: Roads and Access Policy 44 – Telecommunications	Policy LDP 11 relates to a range of considerations linked by the theme of connectivity. This has been split into separate topic areas within LDP2.
SG LDP ENV 11 - Protection of Soil and Peat Resources	Policy 79 – Protection of Soil and Peat Resources	No policy change, wording remains the same.
SG LDP ENV 14 – Landscape	N/A	N/A
SG LDP TRAN 7 – Safeguarding of Airports	Policy 43 – Safeguarding of Aerodromes	Whilst the wording of these policies differs, they both relate to safeguarding issues on the same sites.

6.6 References

- Argyll and Bute Council (2011). Argyll and Bute Council Woodland and Forestry Strategy. [Online] Available: <http://www.argyll-bute.gov.uk/sites/default/files/planning-and-environment/woodland%20and%20forestry%20strategy%20april%202011.pdf>
- Argyll and Bute Council (2015). Local Development Plan Written Statement, Adopted March 2015. [Online]. Available: <http://www.argyll-bute.gov.uk/sites/default/files/ldp/adopted/Written%20Statement/Argyll%20and%20Bute%20Adopted%20Local%20Development%20Plan%20Written%20Statement%20Final%20with%20Cover.pdf>
- Argyll and Bute Council (2017). Argyll and Bute Landscape Wind Energy Capacity Study [Online]. Available: <https://www.argyll-bute.gov.uk/planning-and-environment/landscape-wind-energy-capacity-study>
- Argyll and Bute Council (2018). Renewable Energy Action Plan. [Online]. Available: <https://www.argyll-bute.gov.uk/planning-and-environment/renewable-energy-action-plan>
- Argyll and Bute Council (2019). Local Development Plan 2 Written Statement. [Online]. Available: https://www.argyll-bute.gov.uk/sites/default/files/finalpldp2writtenstatementdepositv2_ac.pdf
- Argyll and Bute Council (2020). Argyll and Bute Indicative Regional Spatial Strategy. [Online]. Available: <https://www.argyll-bute.gov.uk/moderngov/documents/s166821/Draft%20FULL%20Indicative%20RSS%20v7.pdf>
- Committee on Climate Change (2019) Net Zero: The UK's Contribution to Stopping Global Warming. [Online]. Available: <https://www.theccc.org.uk/publication/net-zero-the-uks-contribution-to-stopping-global-warming/>

- Committee on Climate Change (2020) Reducing emissions in Scotland – 2020 Progress Report to Parliament. [Online]. Available: <https://www.theccc.org.uk/publication/reducing-emissions-in-scotland-2020-progress-report-to-parliament/>
- Forestry Commission Scotland (2009) Policy on Control of Woodland Removal [Online]. Available: <https://forestry.gov.scot/publications/285-the-scottish-government-s-policy-on-control-of-woodland-removal>
- Scottish Executive, (2000). Planning Advice Note (PAN) 60: natural heritage. [Online]. Available: <https://www.gov.scot/publications/pan-60-natural-heritage/>
- Scottish Executive, (2005). Planning Advice Note (PAN) 75: Planning for Transport. [Online]. Available: <https://www.gov.scot/publications/planning-advice-note-pan-75-planning-transport/>
- Scottish Executive, (2006a). Planning Advice Note (PAN) 68: Design Statements. [Online]. Available: <https://www.gov.scot/publications/planning-advice-note-68-design-statements/#:~:text=Explains%20what%20a%20design%20statement,should%20be%20prepared%20and%20presented>
- Scottish Executive (2006b). Planning Advice Note (PAN) Planning, Environmental Protection and Regulation [Online]. Available: <https://www.gov.scot/publications/planning-advice-note-pan-51-revised-2006-planning-environmental-protection/>
- Scottish Government, (2010). Planning Advice Note (PAN) 3/2010: Community Engagement. [Online]. Available: <https://www.gov.scot/publications/planning-advice-note-3-2010-community-engagement/>
- Scottish Government, (2011). Planning Advice Note (PAN) 1/2011: Planning and Noise. [Online]. Available: <https://www.gov.scot/publications/planning-advice-note-1-2011-planning-noise/>
- Scottish Government, (2011). Planning Advice Note (PAN) 2/2011: Planning and Archaeology. [Online]. Available: <https://www.gov.scot/publications/pan-2-2011-planning-archaeology/>
- Scottish Government (2013a). Planning Advice Note (PAN) 1/2013: Environmental Impact Assessment. [Online]. Available: <http://www.gov.scot/Resource/0043/00432581.pdf>
- Scottish Government (2013b). Online Renewables Planning Advice - Wind Farm Developments on Peat Land. [Online]. Available: https://www.gov.scot/binaries/content/documents/govscot/publications/advice-and-guidance/2013/05/wind-farm-developments-on-peat-land-planning-advice/documents/wind-farm-developments-peat-land_online-renewables-advice-pdf/wind-farm-developments-peat-land_online-renewables-advice-pdf/govscot%3Adocument/Wind%2BFarm%2BDevelopments%2BOn%2BPeat%2BLand_online%2Brenewables%2Badvice.pdf
- Scottish Government (2014a). Scotland's Third National Planning Framework. [Online]. Available: <http://www.gov.scot/Resource/0045/00453683.pdf>

- Scottish Government (2014b). Scottish Planning Policy. [Online]. Available: <http://www.gov.scot/Resource/0045/00453827.pdf>
- Scottish Government (2014c). Online Renewables Planning Advice: Onshore Wind Turbines. [Online] Available: <https://www.gov.scot/publications/onshore-wind-turbines-planning-advice/>
- Scottish Government (2017a) The Scottish Energy Strategy: The Future of Energy in Scotland. [Online] Available: <https://www.gov.scot/publications/scottish-energy-strategy-future-energy-scotland-9781788515276/>
- Scottish Government (2017b) Onshore Wind Policy Statement. [Online]. Available: <https://www.gov.scot/publications/onshore-wind-policy-statement-9781788515283/>
- Scottish Government (2019a) The Scottish Government's Programme for Scotland 2019-2020 'Protecting Scotland's Future'. [Online]. Available: <https://www.gov.scot/publications/protecting-scotlands-future-governments-programme-scotland-2019-20/>
- Scottish Government (2019b). The Scottish Forestry Strategy 2019. [Online]. Available: <https://forestry.gov.scot/forestry-strategy>
- Scottish Government (2020a) Update to the Climate Change Plan 2018 – 2032: Securing a Green Recovery on a Path to Net Zero. [Online]. Available: <https://www.gov.scot/publications/securing-green-recovery-path-net-zero-update-climate-change-plan-20182032/>
- Scottish Government (2020b) Renewable heat target and action: 2020 update. [Online]. Available: <https://www.gov.scot/publications/update-renewable-heat-target-action-2020/#:~:text=The%20Energy%20Strategy%20set%20the,total%20energy%20through%20renewable%20sources>
- Scottish Government (2021a) Scotland's Energy Strategy Position Statement [Online]. Available: <https://www.gov.scot/publications/scotlands-energy-strategy-position-statement/>
- Scottish Government (2021b) Annual Energy Statement & Quarterly Statistics Bulletin. [Online]. Available: <https://www.gov.scot/binaries/content/documents/govscot/publications/statistics/2018/10/quarterly-energy-statistics-bulletins/documents/energy-statistics-summary---december-2021/energy-statistics-summary---december-2021/govscot%3Adocument/Scotland%2BEnergy%2BStats%2BQ3%2B2021.pdf>
- Scottish Government (2021c) Scotland's Fourth National Planning Framework (Draft). [Online]. Available: <https://www.gov.scot/publications/scotland-2045-fourth-national-planning-framework-draft/documents/>

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