Balmeanach Wind Farm

Planning Statement

August 2023

Balmeanach Wind Farm Limited

PLANNING STATEMENT

Balmeanach Wind Farm

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This Planning Statement has been prepared by SLR Consulting Ltd on behalf of Balmeanach Wind Farm Limited ('the Applicant') to support a planning application under the Town and Country Planning (Scotland) Act 1997 (as amended) for permission to construct and operate up to 10 wind turbines with associated infrastructure (the Balmeanach Wind Farm hereafter referred to as the 'Proposed Development').

The site is located in the north west of the Isle of Skye, approximately 3km to the south of the settlement of Edinbane, approximately 8km to the east of Dunvegan and approximately 7km to the north of Struan (**Figure 2**). Access to the site would be via the existing Ben Aketil Wind Farm access track from the A850, and then south east via the consented Ben Sca Wind Farm access track onto the hillside.

In selecting the site and developing the layout of the Proposed Development, the need to maximise the full renewable energy potential has been carefully balanced against the need to ensure that it does not result in any unacceptable environmental impacts. This has involved undertaking extensive environmental surveys and assessment work over the course of the last few years, and on the basis of this work developing and amending the infrastructure layout to avoid, prevent or reduce any potentially significant adverse environmental effects as far as possible. Full consideration has also been given to feedback from the Highland Council and other consultees involved in the pre-application stages on their views on the acceptability of predicted environmental impacts, as well as from those members of the local community who attended and responded to the extensive programme of public consultation activities that have been undertaken.

The Proposed Development would have a capacity of approximately 45MW. The annual generation from the wind turbines is estimated at approximately 167,140 Megawatt hours (MWh) of electricity (which corresponds to a capacity factor of 42.4%). Based upon this predicted annual electricity generation and the most recent energy statistics provided by the Department for Energy Security and Net Zero (DESNZ) which identify that the average GB domestic household consumption is 3,509kWh per annum, it is estimated that the Proposed Development would supply renewable electricity equivalent to the current annual domestic needs of approximately 47,630 households.

This Planning Statement provides an overview of the Proposed Development and its associated benefits to renewable energy generation targets, carbon dioxide (CO_2) emissions off-setting and to the local community in terms of the community benefit fund and shared ownership scheme that is being committed to by the Applicant.

The Planning Statement then goes on to assess the Proposed Development against relevant national and local planning policy and supplementary guidance, energy policy and other relevant material considerations.

For the purposes of this application, the Development Plan for the Proposed Development comprises NPF4, the Highland Wide Local Development Plan (HwLDP) (2012), the adopted West Highlands and Islands Local Development Plan (WestPlan) (2019) and relevant supplementary guidance including the Onshore Wind Energy Supplementary Guidance (OWESG) 2016. NPF4, adopted in February 2023, provides an up-to-date and supportive planning policy position within which to consider the Proposed Development. A priority for decision makers, as set out in NPF4, is the global climate emergency and it recognises that a rapid increase in electricity generation from renewable sources is essential for Scotland to meet its net zero emissions targets.

An assessment of the Proposed Development against the relevant policies of NPF4 has been undertaken as it provides the most up-to-date policy position followed by consideration of the relevant policies from the HwLDP. Other material considerations are then assessed in light of the Proposed Development including an assessment of Scotland's progress towards renewable energy generation and greenhouse gas emissions reduction targets.

Significant weight should be given to this up-to-date supportive policy context and the potential contribution of the Proposed Development to renewable energy and emissions reductions targets in the determination of this planning application. It is concluded that the planning balance lies firmly in favour of the Proposed Development and planning permission should be granted.

1.0 Introduction

1.1 The Application

1. The Proposed Development would be known as Balmeanach Wind Farm and would be centred on NGR 133900, 846750[1], as shown on **Figures 1 and 2**. The application boundary covers the area shown on **Figure 3**.

2. This Planning Statement has been prepared on behalf of Balmeanach Wind Farm Limited ('the Applicant') to support a planning application under the Town and Country Planning (Scotland) Act 1997 (as amended) for permission to construct and operate a wind farm comprising of up to 10 turbines and associated infrastructure ('the Proposed Development') on land ('the site') located approximately 3km to the south of Edinbane, approximately 8km to the east of Dunvegan and approximately 7km to the north of Struan on the Isle of Skye (**Figure 2**)[2].

3. The planning application is supported by an Environmental Impact Assessment ('EIA') Report which sets out the findings of the EIA undertaken for the Proposed Development. This Planning Statement does not form part of the EIA Report. However, reference is made to the conclusions of the EIA Report in assessing the Proposed Development against the provisions of the Development Plan and other relevant material considerations.

4. The Proposed Development is classified as a 'major' development under the Town and County Planning (Hierarchy of Development) (Scotland) Regulations 2009 as the combined installed capacity of the wind farm would be over 20MW but under 50MW. The planning application is therefore accompanied by a Pre-Application Consultation ('PAC') Report which details the community consultation that was undertaken, the comments made, and how these comments have influenced the layout and design of the Proposed Development.

5. The application is also accompanied by a Design and Access Statement. The purpose of the Design and Access Statement is to explain the design principles and concepts that have been applied to the Proposed Development.

1.2 The Applicant

6. The Applicant is Balmeanach Wind Farm Limited, a subsidiary of EDPR. Balmeanach Wind Farm is being developed by Wind2 on behalf of EDPR.

7. Wind2 is a specialist onshore wind farm developer founded in 2016. The company has staff based in the Highlands, Perth, Edinburgh, as well as Wales and in various locations throughout England, with significant expertise in renewable energy and a track record of successfully developing onshore wind farms throughout the UK. Wind2 is working on the development of a number of renewable energy projects and is committed to investing in the Highlands and Islands of Scotland. Wind2 was the developer for the adjacent consented Ben Sca Wind Farm. Further information on Wind2 can be found on its corporate website at https://wind2.co.uk.

[1] Centre point of proposed turbine array
[2] Measurements taken from main development area including turbine array

8. EDPR is a global leader in the renewable energy sector and the world's fourth-largest renewable energy producer. EDPR is currently present in the UK and internationally in another 28 markets. EDPR has personnel based in Edinburgh and through its joint venture with ENGIE (Ocean Winds), recently completed construction on the 950MW Moray East Offshore Wind Farm, which has the capability of supplying 40% of Scotland's electricity demand. Further information on EDPR can be found on its corporate website at https://www.edpr.com/en.

1.3 The Purpose of this Planning Statement

9. The primary purpose of this Planning Statement is to provide an assessment of the Proposed Development against Development Plan policy and other relevant material considerations. **Section 2** provides an overview of the project description. **Section 3** provides the planning policy assessment. **Section 4** weighs up the planning case for the Proposed Development and provides concluding remarks on the acceptability of the scheme.

2.0 Project Overview

2.1 Introduction

10. This section introduces the site of the Proposed Development and provides an overview of the project description.

11. A detailed description of the site and surrounding area can be found in **Chapter 2: Site Description and Design Evolution** in Volume 2 of the EIA Report. A detailed project description can be found in **Chapter 3: Description of the Development** in Volume 2 of the EIA Report.

2.2 Site Location and Description

12. The site, which measures approximately 476 hectares (ha), centred on NGR 133900, 846750 is located on moorland approximately 3km to the south of the settlement of Edinbane, approximately 8km to the east of Dunvegan and approximately 7km to the north of Struan on the north west of the Isle of Skye (**Figure 1**). The proposed turbines would be located across two landownerships – primarily on the Bracadale Estate, on ground which forms part of the Balmeanach and Caroy Common Grazings, and partly on the Coishletter Estate. Access to the site would be via the existing Ben Aketil Wind Farm access track from the A850, and then south east via the consented Ben Sca Wind Farm site access track onto the hillside.

13. The site lies within an upland landscape that is characterised by a series of smooth moorland slopes incised by small watercourses. The land is grazed by sheep and deer. To the south, an area of forestry covers the lower slopes of Beinn a' Chleirich, to the east of the crofting township of Balmeanach.

14. For the main development area of the site, the topography slopes to the south east from 283m above ordnance datum (AOD) at the summit of Ben Sca down to the lower slopes at approximately 160m AOD.

15. There are no environmental or landscape designations identified within the site. The closest environmentally designated site is the An Cleireach Site of Special Scientific Interest (SSSI) located approximately 1km to the south cited due to its geological importance.

16. On 03 March 2018, parts of the site were damaged due to a wild fire which spread from moorland to the south east of the site in the Glen Vic Askill area, aided by easterly winds. Much of the open ground and heathland habitat within the site was fire damaged but the fire did not burn into the peat, given that the ground was near frozen at the time. Approximately 9.9ha of Sitka spruce/lodgepole pine plantation to the north were affected.

17. Located in the west of the site is a commercial forested area of approximately 78ha, which was planted in 1990. The quality of the planted trees is considered to be poor to very poor, due to the soil being unsuitable for tree growth (further information is provided in **Technical Appendix 3.3: Assessment of Potential Areas for Woodland Removal for Peatland Restoration** in Volume 4a of the EIA Report).

18. The surrounding area is rural in nature, with land predominantly used for grazing and forestry. There is coniferous plantation to the north and west of the site. There are several residential properties and crofts located to the south and south west of the site which extend down to the A863 and Loch Caroy; the closest being approximately 2.1km from the nearest proposed turbine (Turbine 8).

19. Directly to the east of the site is the operational Edinbane Wind Farm (**Figure 5**) which comprises 18 turbines (100m tip height) extending in a north to south direction between Airgh Neil and Glen Vic Askill at approximately 150m to 160m AOD. These turbines are located between the lower slopes of Beinn a' Chearcaill and Cruachan-Glen Vic Askill (295m AOD) to the east.

20. To the south west of the site lies the operational Ben Aketil Wind Farm and its extension (**Figure 5**) which comprises 12 turbines (100.5m tip height). Ben Aketil Wind Farm extends in a north west to south east orientation and is located to the north west of the summit of Ben Aketil (266m AOD). The southern extent of Ben Aketil Wind Farm is located at 200m AOD, and reduces in elevation to 90m AOD to the north west.

21. The closest environmentally designated sites are the North West Skye Special Landscape Area (SLA) and Greshornish SLA, located approximately 4km south west and 5km north of the site respectively. Dunvegan Garden and Design Landscape (GDL) is located approximately 9km to the west of the site.

2.3 The Proposed Development

22. The Proposed Development would comprise the following principal components as shown on **Figures 4ai-ii/4bi-ii**:

- 10 variable pitch (three bladed) wind turbines, each with a maximum blade tip height of up to 149.9m;
- turbine foundations and a crane hardstanding area which includes areas for blade, tower and nacelle storage at each wind turbine;
- a lattice met mast up to 83.5m height, including foundation and hardstanding area;
- up to 9.4km of new onsite access track and associated drainage with a typical 5m running width (wider on bends) and nine turning heads;
- underground cabling and electrical infrastructure along access tracks to connect the turbine locations, and the onsite electrical substation;
- one onsite substation which would accommodate 33KV Switchgear to collect electricity from different parts of the site. The substation compound would include a control and metering building;
- search area for up to four temporary borrow pits;
- a construction compound which would be retained for the lifetime of the project; and
- clearance of up to 77.75ha of conifer forest for Habitat Management purposes as described in **Technical Appendix 8.5** of Volume 4a.

2.3.1 Micrositing

23. During the construction process there may be a requirement to microsite elements of the Proposed Development infrastructure. This is an important measure which allows for further minimisation of environmental effects, under the supervision of the Environmental Clerk of Works (EnvCoW) who is responsible for overseeing and managing the implementation of environmental policies and procedures on a construction site, and for ensuring that the construction activities comply with relevant environmental legislation, regulations, and best practices. The EnvCoW would be onsite during construction in certain areas / months to be agreed with the Highland Council (THC) and NatureScot and in line with proposals set out in the Outline Construction Environmental Management Plan (CEMP) (**Technical Appendix 3.1**).

24. It is proposed that a 50m micrositing tolerance of turbines and all other infrastructure would be applied to the Proposed Development (so long as infrastructure does not move into the watercourse or heritage buffers) The location of Turbine 8 should not move any closer to the telecommunication link to the south as the clearance distance is limited. The 50m micrositing allowance for Turbine 8 would therefore be limited to the west, north and east. Within this distance any changes from the consented locations would be subject to approval of the EnvCoW as required and in consideration of other known constraints. It is anticipated that the agreed micrositing distance would form a planning condition accompanying consent for the Proposed Development.

2.3.2 Wind Turbines

25. A range of wind turbine models may be suitable for the Proposed Development, and the final choice of turbine model would be selected through a competitive procurement process and would be dependent upon technology available at the time. As there is an uncertainty relating to which wind turbine model would be used at the time of construction, this application requests a reasonable degree of flexibility for the permissible dimensions of the turbine. It is considered appropriate for a planning condition to be included in any grant of permission that requires details of the final turbine dimensions to be submitted and approved by the Planning Authority prior to the commencement of the development. However, based upon a maximum blade tip height of 149.9m, it is anticipated that the installed nominal capacity of each wind turbine would be approximately 4.5MW.

26. In accordance with the Ministry of Defences low flying requirements, it is confirmed that the wind turbine hubs would be fitted with infra-red lighting which would not be visible to the human eye. No visible aviation lighting will be required to be installed on the proposed turbines by the Civil Aviation Authority (CAA) due to them being under the 150m height threshold for lighting requirement.

2.3.3 Ancillary Infrastructure

27. Turbine foundations would be designed to accommodate the final choice of turbines and to suit site specific ground conditions. The final design specification for each foundation would depend on the findings of detailed ground investigation of the land on which each turbine would be located.

28. A crane hardstanding of approximately 36m by 22m would be required adjacent to each wind turbine with additional blade (74m x 15m), nacelle (22m x 6m) and tower storage areas (36m x 20m) adjacent to and opposite the access track. The hardstanding would provide a stable base for construction and crane erection activities. These hardstanding areas would be permanently retained.

29. The site would be accessed from the A850 via the existing Ben Aketil access track, and consented Ben Sca access track. Up to 9.4km of new track would be constructed.

30. The electricity produced by the wind turbines would be fed to a substation control building to be located within a compound area in the north west of the site at NGR 133350, 847485.

31. A construction compound (opposite the substation compound at NGR 133405, 847515) would be required for the duration of the construction phase and would be retained for the lifetime of the project. Future use of this area for other technologies is being considered e.g. battery storage; but does not form part of this planning application. The construction compound would have a footprint of up to 100m x 80m (8,000m^2) and would be likely to contain the following during construction: modular building(s) to be used as a site office; welfare facilities; parking for construction staff and visitors; a reception area; a fuelling point or a mobile fuel bowser; secure storage areas for tools; and waste storage facilities.

32. It is proposed to source aggregate for the construction of the Proposed Development from up to four onsite borrow pits. Quarrying all of these borrow pits could provide a greater volume of rock than would be needed for the construction of the Proposed Development but would allow for the current uncertainty of the quality of the rock at these locations. It is the aim of the Applicant to source as much of the rock as possible from onsite, subject to confirming that it is of suitable quality from geotechnical investigation, as this would minimise the need to transport large quantities of aggregate across the Isle of Skye. The transport assessment presented in **Chapter 14** of the EIA Report presents two scenarios of a large proportion of aggregate sourced onsite versus all aggregate being imported to site from external quarries.

2.3.4 Grid Connection

33. Grid connection is dependent on the transmission network reinforcement, which is being progressed by Scottish & Southern Electricity Networks, and the connection point will be the new Edinbane Grid Supply Point (GSP), to the south east of the site, which is proposed to be delivered as part of the grid reinforcement. Significant upgrades to the electricity grid from Fort Augustus to the Isle of Skye (known as the Skye Reinforcement Project, Energy Consents Unit Application Ref: ECU00003395) are expected to be completed by the end of 2025, allowing the Proposed Development to be connected to the grid in 2026/2027.

34. The grid connection is likely to require consent under Section 37 of the Electricity Act 1989 which is the subject of a separate consenting process to the planning application for the Proposed Development. The grid connection application would be made by Scottish and Southern Electricity Networks who are responsible for the National Grid in the area of the Proposed Development and who would own assets beyond the site substation.

2.3.5 Construction Phase

35. It is anticipated that construction activities for the Proposed Development would last up to 18 months.

36. It is anticipated that the Port of Kyle of Lochalsh would be used as the port of entry for the wind turbine components. Abnormal loads transporting these components would then route on the existing public road network via the A87, then along the A850 to site. The site would be accessed from the A850 on a track which was built for the Ben Aketil Wind Farm; and then via the consented spur track which will be created for the Ben Sca Wind Farm.

2.3.6 Operational Phase

37. Planning permission is being sought for an operational period of up to 40 years from the date of final commissioning. Once operational, the Proposed Development would largely be controlled and managed remotely, however there would be technicians on site regularly and it would be maintained throughout its operational life via servicing at regular intervals. It is anticipated that there would be approximately four annual service visits per turbine by a service team of up to three people. Inspections of high-voltage equipment and general site safety are expected to be carried out monthly. Faults would be responded to as required, most likely by a team of two technicians.

2.3.7 Decommissioning Phase

38. At the end of the operational life, the Proposed Development would be decommissioned. Alternatively, a new planning application may be submitted to repower the site.

39. The ultimate decommissioning approach would be agreed with the Planning Authority and other appropriate regulatory authorities in line with best practice guidance and requirements of the time. This would be done through the preparation and agreement of a Decommission and Restoration Plan (DRP). Financial provision for the decommissioning would be provided for. A period of up to two years is being sought for decommissioning and site restoration.

2.4 Benefits of the Proposed Development

2.4.1 Renewable Electricity Generation

40. The Proposed Development would have a capacity of approximately 45MW. The annual generation from the wind turbines is therefore estimated at approximately 167,140 Megawatt hours (MWh) of electricity annually (which corresponds to a capacity factor of 42.4%).

41. Based upon this predicted annual electricity generation and the most recent energy statistics provided by the Department of Business, Energy and Industrial Strategy (BEIS) which identify that the average GB domestic household consumption is 3,509kWh per annum[3], it is estimated that the Proposed Development would supply renewable electricity equivalent to the current annual domestic needs of approximately 47,630 households.

42. On the basis of anticipated renewable energy generation output presented above, it is submitted that the Proposed Development would make a substantial contribution towards climate change targets, in particular towards the Scottish Government's target for a minimum installed capacity of 20GW of onshore wind by 2030. This is particularly relevant given that it is anticipated that this project would connect into the grid before 2030 and can therefore make a valuable contribution towards this target.

2.4.2 Carbon Payback

43. The Proposed Development would reduce greenhouse gas emissions through replacing fossil fuel generation. The calculations of total CO_2 emission savings and payback time for the Proposed Development indicates the overall payback period of a wind farm with 10 turbines with an installed capacity of 45MW would be approximately 2 years, when compared to the fossil fuel mix of electricity generation. The site would in effect be in a net gain situation following this time period contributing directly to the Scottish Government's target for a minimum installed capacity of 20GW of onshore wind by 2030.

44. The potential savings in CO_2 emissions due to the Proposed Development replacing other electricity sources over the lifetime of the wind farm (assumed to be 40 years for the purpose of the carbon calculator) are approximately:

- 167,475 tonnes of CO_2 per year over coal-fired electricity (6.7 million tonnes assuming a 40 year lifetime for the purposes of the carbon calculator);
- 32,322 tonnes of CO_2 per year over grid-mix of electricity (1.3 million tonnes assuming a 40 year lifetime for the purposes of the carbon calculator); or
- 72,205 tonnes of CO_2 per year over a fossil fuel mix of electricity (2.9 million tonnes assuming a 40 year lifetime for the purposes of the carbon calculator).

[3] Department for Energy Security and Net Zero (DESNZ)) - Subnational Electricity and Gas Consumption Statistics – December 2022

2.4.3 Peatland Restoration and Habitat Management Benefits

45. An Outline Habitat Management Plan (OHMP) has been produced for the Proposed Development (**Technical Appendix 8.5**). The OHMP sets out the proposed habitat restoration and management measures in relation to the Proposed Development, which would remain in place for the lifetime of the scheme. These measures are required to provide compensation for potential negative effects on important ecological features, notably blanket bog, and to provide significant biodiversity enhancements, in accordance with Scotland's National Planning Framework 4 (NPF4), Policy 3: Biodiversity.

46. The OHMP sets out the following objectives for the Habitat Management Area (HMA):

- fell trees within a 77.75ha area of conifer plantation within the HMA;
- treat the ground surface post-felling to increase its suitability for bog regeneration, e.g. through surface smoothing;
- increase the water table across the HMA, and create bog pools through ditch blocking;
- address species composition and integration into the wider ecosystem network by seeding or encouraging self-setting of species representative of refence ecosystems and of local genetic origin;
- to maintain the HMA free of trees, particularly non-native conifer regeneration;
- to control threats to regenerating bog habitats such as grazing and fire;
- to monitor bog regeneration to assess if the necessary conditions have been created that should, in time, increase the abundance and distribution of bog plants, particularly peat forming Sphagnum mosses, and facilitate its recovery back to active peatland habitat; and
- to facilitate the monitoring and evaluation process by identifying areas of reference habitats within/ adjacent to the HMA against which regeneration progress can be measured and collecting baseline data within these and the proposed restoration locations.

47. The area proposed for peatland restoration is considered to be a degraded habitat due to inappropriate tree planting in the past. Restoration of this peatland habitat would present an opportunity to compensate for the predicted loss of habitat as well as providing additional biodiversity enhancement, whilst also sustaining nature networks.

48. It is also considered that the peatland restoration would provide the opportunity to extend the restoration areas proposed for the consented Ben Sca Wind Farm and its Extension, thereby enhancing habitat connectivity.

2.4.4 Socio-economic Benefits

49. During the 18 months construction phase, the Proposed Development is expected to support 26 employment person years during the wider construction phase. During the operational phase the Proposed Development is expected to create between 8 and 10 indirect jobs created in the operational and maintenance supply chain for the project locally, and a total of between 11 and 14 jobs created in THC area. The effect on employment during the operational phase is judged in the EIA Report to be negligible (positive) but not significant.

50. The Applicant acknowledges the importance of employing good practice measures in maximizing local procurement, taking into consideration resources such as the Renewables UK Good Practice Guidance 2014: 'Local Supply Chain Opportunities in Onshore Wind' (RenewablesUK, 2014). The Applicant also recognises the value of building upon recent UK best practices in innovative local procurement, which

may include implementing a Local Contractor Policy. In this regard, primary contractors that demonstrate a clear commitment to increasing local content in their supply chains may receive additional consideration in the tendering process.

51. With the intention of fostering strong relationships with local suppliers and promoting transparency, the Applicant plans to establish a presence on Skye well in advance of the construction commencement. To ensure local businesses are informed about contracting opportunities, the Applicant will organise a series of 'Meet the Supplier' events prior to the main tender process.

52. The Scottish economy would be expected to be boosted by a total of £1.8 million of net GVA during the development, construction and commissioning period. This is considered to be a positive benefit of the Proposed Development.

53. At this stage in the development process, it is not possible to quantify economic benefits in respect of individual supply chain companies, as contracts would not be let until consent is granted. However, it is evident from recent wind farm construction experience in Scotland (including BVGA report on economic benefits (BVG Associates, 2017) that suppliers of a wide range of goods and services within the Highland region and Scotland as a whole would obtain benefit from the Proposed Development. The 2023 annual Supply Chain Impact Statement by Scottish Renewables has revealed that 89% of Scotland's renewable energy supply chain believe renewable energy is the biggest economic opportunity for Scotland and 83% having recruited new employees as a result of opportunities in the renewable energy industry.

2.4.5 Public Access and Outdoor Recreation Benefits

54. To improve access within the site a number of strategic routes have been proposed. The enhancement of paths and trails within the site would be achieved through the presence of up to 9.4km of new wind farm tracks that would open up the area for informal recreational opportunities e.g. cyclists, mountain bikers, equestrian users, cross country skiing and walking. There is potential for linkages to be formed between the proposed tracks and other access tracks in the area through the agreement of the Applicant and other wind farm developers. This agreement could facilitate the implementation of longer recreational routes, including a proposed additional footpath link to adjoin with the existing Edinbane Wind Farm access tracks, which could result in a circular route to and from Edinbane (as shown on **Figure 14.2.1** of **Technical Appendix 14.2: Preliminary Access Management Plan** (Volume 4b of the EIA Report).).

55. The potential new routes would also enhance the opportunity for all types of users to link with the existing, consented and proposed wind farm sites, opening up new areas that might enhance a person's experience of the wider area. It is considered likely that with the formal designation of paths and trails for recreational use, the level of use within the area would increase and new visitors would be attracted to the area, whether for walking, running, cycling (including mountain biking) and / or horse riding.

56. Additionally, in order to supplement these new enhancements, the Applicant would be willing to discuss the provision of signage and interpretation boards with the relevant access stakeholders.

2.4.6 Community Benefit and Shared Ownership

57. The Applicant is committed to offering a package of community benefits to local communities that would include a community benefit payment based on a fixed annual sum per MW of installed capacity, and the opportunity to share in the profits of the Proposed Development through community investment in the project.

58. Assuming a project scale of 45MW, the Applicant is proposing a community benefit package of up to £225,000 per annum over the 40 year life of the Proposed Development, based on a figure of £5,000 per annum per MW. This would be index linked over the 40 years using the Retail Price Index (RPI). Of this £5,000 per MW it is proposed that a Near Neighbours Electricity Contribution scheme be created. Two options are potentially available with option 1 providing £400 per property per annum be paid direct to the properties within an agreed distance of the Proposed Development. Option 2 could see residents within the same catchment area, capitalise the electricity bill contribution, converting this to a single lump sum of £4,500 to fund or part fund measures to improve the energy efficiency and decarbonisation of their home. This is in recognition of community consultation feedback and in an effort to deliver a direct benefit to those within closest proximity as well as helping to combat fuel poverty.

59. The proposed opportunity for the local community to invest in the wind farm, and hence share the profits resulting from its operation, supports the Scottish Government's ambition to deliver lasting economic and social benefits to communities from renewable energy development in Scotland. The Applicant has already shared initial information with the community about their opportunity to invest.

60. An Agreement of Intent has been prepared and issued by the Applicant in conjunction with Local Energy Scotland (LES) that sets out the basis for the proposed ownership model, the likely structure of the community vehicle and the role of LES. The Ben Sca Wind Farm and Extension is being developed by the same company as the Proposed Development; and it is anticipated that the agreement and proposed ownership model which is being progressed for the consented scheme would be extended to include Balmeanach Wind Farm. In the event that the planning application for the wind farm is approved, both the Community Trusts and the Company will progress negotiations to include the Balmeanach Wind Farm in the model and, assuming the Trusts find the final investment case to their satisfaction, the parties will negotiate binding agreements.

61. Income derived from both the community benefit scheme and shared ownership could, depending on the choices made, have a positive effect on the physical and mental well-being of local residents as well as economic benefits. The long term nature of the income would allow the community to plan ahead, to draw in other sources of match funding to maximise the benefits, and investment projects could be designed to match local priorities.

62. The choice of investment priorities for the Community Trusts is not yet known, although they are likely to be based on existing community priorities such as those identified in 'An Atlas of Edinbane', the Struan Action Plan and the 'Skye Local Area Action Plan 2017'.

63. Whilst the effects cannot be precisely quantified at this stage due to uncertainty as to the quantum of funding that would be available to the community vehicle and its choice of investment priorities, it is clear that the proposed community investment measures could offer real social and economic benefits to the local community and do have the potential to be significant.

64. It is acknowledged that community benefits are not a material consideration in the assessment of the Proposed Development and are therefore not discussed in any further detail in this Planning Statement.

3.0 Planning Policy Assessment

3.1 Introduction

65. The primacy of the Development Plan in determining planning applications is established by Sections 25 and 37 of the Town and Country Planning (Scotland) Act 1997 (as amended). These provisions require decision makers to determine planning applications in accordance with the Development Plan unless material considerations indicate otherwise.

66. This section of the Planning Statement assesses the Proposed Development against the relevant provisions of the Development Plan and other relevant material considerations.

67. Section 13(2)(1) of the Planning (Scotland) Act 2019 amended Section 24 of the Town and Country Planning (Scotland) Act 1997 to state that the Development Plan for an area is to be taken as consisting of the provisions of the National Planning Framework (NPF) alongside any local development plan for the time being applicable to the area. For the purposes of this application, the Development Plan for the Proposed Development therefore comprises NPF4, the Highland Wide Local Development Plan (HwLDP) (2012), the adopted West Highlands and Islands Local Development Plan (WestPlan) (2019) and relevant supplementary guidance including the Onshore Wind Energy Supplementary Guidance (OWESG) 2016.

68. Section 24 of the 1997 Planning Act as amended by Section 13 of the Planning (Scotland) Act 2019 provides that in the event of any incompatibility between the provision of the National Planning Framework and a provision of the Local Development Plan, whichever of them is the later in date is to prevail. That includes where a Local Development Plan is silent on an issue that is now provided for in NPF4.

3.2 Development Plan Policy

3.2.1 National Planning Framework 4 (NPF4)

69. National Planning Framework 4 (NPF4) was adopted by the Scottish Government on 13 February 2023 and now forms part of the statutory Development Plan for planning applications made under the Town and Country Planning (Scotland) Act 1997.

70. Annex A of NPF4 details how it is to be used in decision making and makes clear that it is read as a whole. This was reiterated in a letter issued by the Chief Planner and Planning Minister on 08 February 2023, which recognised that conflicts between individual policies are to be expected, and that factors for and against development will be weighed up in the balance of planning judgement.

71. Eighteen national developments are identified in total in NPF4. These are defined as "*significant developments of national importance that will help to deliver our spatial strategy*". NPF4 identifies that "*national development status does not grant planning permission for the development*" but does clarify that "*their designation means that the principle of the development does not need to be agreed in later consenting processes*."

72. Annex B of NPF4 provides further details and Statements of Need for each of the 18 national developments. National Development 3 is for Strategic Renewable Electricity Generation and Transmission Infrastructure, for which NPF4 states that:

"*This national development supports renewable electricity generation, repowering, and expansion of*

the electricity grid.

A large and rapid increase in electricity generation from renewable sources will be essential for Scotland to meet its net zero emissions targets. Certain types of renewable electricity generation will also be required, which will include energy storage technology and capacity, to provide the vital services, including flexible response, that a zero carbon network will require. Generation is for domestic consumption as well as for export to the UK and beyond, with new capacity helping to decarbonise heat, transport and industrial energy demand. This has the potential to support jobs and business investment, with wider economic benefits."

73. National Development 3 is identified as being applicable to the whole of Scotland, including the North and West Coast and Islands within which the Proposed Development is located. Although Appendix B clarifies that only onshore wind farms with a capacity exceeding 50MW would qualify as being classified as of national development status under National Development 3, it is considered that the inclusion of renewable energy projects as national development, together with the more specific policies detailed below, establishes a clear needs case for the development of renewable energy projects at any scale.

NPF4 Spatial Strategy - Part 1

74. Part 1 of NPF4 is 'A National Spatial Strategy for Scotland 2045', removing the previously adopted spatial framework for Onshore Wind Farms and replacing it with a strategic spatial strategy which supports onshore wind energy generation and associated grid infrastructure in Scotland. The spatial strategy is to support the delivery of:

- 'Sustainable Places': "where we reduce emissions, restore and better connect biodiversity";
- 'Liveable Places': "where we can all live better, healthier lives"; and
- 'Productive places': "where we have a greener, fairer and more inclusive wellbeing economy".

75. The delivery of 'Sustainable Places' is considered most relevant to the Proposed Development. The commentary on Page 6 of NPF4 notes that "*every decision on our future development must contribute to make Scotland a more sustainable place*" whilst also encouraging the "*expansion of renewable energy*" in order to meet greenhouse gas emissions targets.

76. NPF4 also recognises that "*nature recovery must be at the heart of future places*" and that positive biodiversity effects must be secured for future development.

77. A key point to note is the foundation role that the climate emergency and nature recovery have in the National Planning Framework. Tackling both issues are crucial to the outcome of many of the NPF4 policies. As echoed by Policy 1 of NPF 4 (discussed in further details in **Table 3-1**), the climate emergency and nature recovery are to be given significant weight when determining proposals. This represents a fundamental shift in planning policy response to climate change. It provides clarity to decision makers on the amount of weight that should be applied to these crucial topics when determining planning applications and this policy also recognises the inter-related nature of these twin issues.

NPF4 National Planning Policy – Part 2

78. Part 2 of NPF4 sets out national planning policies by topic related to the three themes of sustainable, liveable and productive places. In terms of development management and the application of national level policies, NPF4 states:

"The policy sections are for use in the determination of planning applications. The policies should be read as a whole. Planning decisions must be made in accordance with the development plan, unless

material considerations indicate otherwise. It is for the decision maker to determine what weight to attach to policies on a case by case basis. Where a policy states that development will be supported, it is in principle, and it is for the decision maker to take into account all other relevant policies".

79. Page 36 of NPF4 introduces the 'sustainable places' policies which are the policies most applicable to the Proposed Development. The principal policies to consider for the proposed wind energy development are **Policy 1: Tackling the Climate and Nature Crises** and **Policy 11: Energy**.

80. Policies 1 and 11 are considered first in this section, with other relevant policies then considered in numerical order thereafter.

Policy 1: Tackling the Climate and Nature Crises

81. This policy represents a fundamental change in Scottish planning policy and prescribes the amount of weight that should be applied to the global climate and nature crises in assessing development proposals; these issues must now form priorities for the decision maker. As stated in Page 8 of NPF4, significant weight is to be given to "*the global climate emergency in order to ensure that it is now recognised as a priority in all plans and decisions*."

82. Renewable energy is one of the best tools available to tackle the global climate crisis and given the nature of the Proposed Development and its potential contribution towards Scottish Government targets, significant weight should be given to this policy in the overall assessment of whether the Proposed Development accords with the Development Plan.

83. The natural environment on which the Proposed Development is to be located has been a key consideration in the design of the proposed wind farm and the final design has sought to balance competing environmental and technical considerations. Given the extent of peatland habitat on site, it has not been possible to avoid this habitat however, informed by a comprehensive peat probing exercise and iterative design process, the development has sought to position turbines and infrastructure on areas of shallower peat, avoid flush habitats and sensitive bog habitats as far as possible.

84. To compensate for the loss of peatland and associated heathland habitat, an OHMP has been proposed which aims to restore an area of degraded habitat, increase habitat connectivity with adjoining habitat management areas of adjacent Wind Farms and adjacent bog/heath habitats.

85. On this basis, it is considered that Proposed Development can draw strong policy support from NPF4 Policy 1.

Table 3-1: Analysis of NPF4 Policy 1 against the Proposed Development

Relevant Policy Text	Analysis
"When considering all development proposals significant weight will be given to the global climate and nature crises."	The Proposed Development would produce an average of approximately 167,140 Mega Watt hours (MWh) of electricity annually (which corresponds to a capacity factor of 42.4%). This equates to the power consumed by approximately 47,600 average UK households. It is anticipated that the wind farm would be connected to the grid in 2026/2027 and would therefore make a meaningful contribution to the Scottish Government target for a minimum installed capacity of 20GW of onshore wind by 2030 and net zero by 2045, key timescales for the Scottish Government. The carbon calculator which accompanies the EIA Report as **Technical Appendix 15.1** predicts that the Proposed Development would displace 2.9 million tonnes of CO_2 over the lifetime of the wind farm (assumed to be 40 years). It is expected that the overall payback time of a wind farm of the scale and high level of efficiency of the Proposed Development would be approximately 2 years when compared to a fossil fuel mix of energy generation. With regard to the 'nature crises' the findings of the EIA Report related to Ecology and Ornithology are relevant. The Ornithology assessment has concluded that subject to mitigation measures and best practice techniques being implemented on site, there would be no significant effects upon ornithological receptors during the construction, operation or decommissioning of the Proposed Development. With regard to ecology, a programme of peatland restoration has been proposed as part of an OHMP in order to compensate for the habitat loss of peatland and heathland habitat as a result of the Proposed Development as well as to provide for significant biodiversity enhancement. The habitat management area is proposed on an area considered to be degraded habitat (due to inappropriate tree planting on peatland) and would be adjacent to the consented Ben Sca Wind Farm and Ben Sca Wind Farm Extension habitat management areas. In this way, its location would increase the size of restored bog in the area and increase the habitat connectivity with other bog/ heath habitats.

Policy 11: Energy

86. The 'policy principle' for Policy 11 is *"to encourage, promote and facilitate all forms of renewable energy development onshore and offshore. This includes energy generation, storage, new and replacement transmission and distribution infrastructure and emerging low-carbon and zero emissions technologies including hydrogen and carbon capture utilisation and storage (CCUS)."*

87. The Proposed Development is a renewable energy development for the generation of electricity and as such supports the principle of Policy 11.

88. The 'policy outcome' i.e. the desired outcome that Policy 11 is the "*expansion of renewable, low-carbon and zero emissions technologies*."

89. Policy 11(a) provides in principle support for all forms of renewable development proposals, including wind farms. The Proposed Development, being a renewable energy development, therefore has in principle support in terms of policy 11(a).

90. Part (e) of Policy 11 sets out that the project design and proposed mitigation will address how a number of environmental impacts have been addressed. It goes on to state that in considering these impacts in the overall planning balance, significant weight will be placed on the contribution of the proposal to renewable energy generation targets and on greenhouse gas emissions reduction targets. This is a reiteration of the degree of weight that is to be afforded to contributions that the Proposed Development can make to renewable energy targets and greenhouse gas emissions reduction targets, both of which would be contributed to by the Proposed Development and have been discussed in further detail in **Section 2.4**. In respect of Policy 11(e), the EIA Report sets out a robust assessment of the likely potential impacts that will arise from the proposed development.

91. Policy 11(e)(ii) recognises that significant landscape and visual impacts are to be expected for some forms of renewable energy. Given the nature of wind turbines and their visibility in the landscape, this is an important consideration in the decision-making process with regard to potential landscape and visual impacts arising from this form of energy generation. The policy goes on to state that "w*here impacts are localised and/ or appropriate design mitigation has been applied, they will generally be considered to be acceptable."* This is a significant policy departure from Scottish planning policy pre-NPF4 and provides a strong stance for commercial scale wind energy developments where landscape and visual impacts are often inevitable.

92. Significant impacts are predicted on four viewpoints within the Landscape and Visual Assessment. As Policy 11(e)(ii) recognises the potential for significant landscape and visual effects for certain types of renewable energy development, it is considered that for the purposes of Policy 11, the Proposed Development has strong policy support. No other significant impacts are predicted on the other environmental elements assessed in relation to Policy 11 in **Table 3-2**.

93. For the reasons set out in **Table 3-2**, the Proposed Development is considered to be acceptable in relation to all of Policy 11's environmental and technical topic criteria.

Table 3-2: Analysis of NPF4 Policy 11 against the Proposed Development

Relevant Policy Text (summarised where necessary)	Analysis
Policy 11(a) *Development proposals for all forms of renewable, low-carbon and zero emissions technologies will be supported. These include:* *i) wind farms including repowering, extending, expanding and extending the life of existing wind farms;*	The principle of the Proposed Development, a wind farm which generates renewable energy from a low carbon and zero emission technology, is supported by this policy.
Policy 11(b) *Development proposals for wind farms in National Parks and National Scenic Areas will not be supported.*	The Proposed Development is not located in a National Park or National Scenic Area.
Policy 11(c) *Development proposals will only be supported where they maximise net economic impact, including local and community socio-economic benefits such as employment, associated business and supply chain opportunities.*	**Chapter 14: Socio-economics and Land Use** of the EIA Report sets out the predicted socio-economic benefits of the Proposed Development. Key points include: • The Proposed Development is being brought forward with the opportunity for community shared ownership. The preferred model for shared ownership in the project is through revenue (profit) sharing. • It is estimated that, depending on the type of investment selected, the Community Benefit Fund alone would accrue benefits to the local economy of approximately £9 million over the 40 year life of the wind farm. • Gross Value Added (GVA) with a gross total of £1.8 million is predicted to be generated by the project in the economy of the wider study area (WSA) (The Highland Council area of administration) during the development, construction, and commissioning phase. This is equivalent to £1.2 million per annum over the construction period. • With respect to employment, a total of 26 person-years of net additional temporary employment is predicted to be generated in the WSA economy during the construction phase of the proposed project (averaging 17 p.a.). • The Applicant is committed to employing good practice measures with regard to maximising local procurement such as those set out in the Renewables UK Good Practice Guidance 2014: 'Local Supply Chain Opportunities in Onshore Wind' (RenewablesUK, 2014).

Relevant Policy Text (summarised where necessary)	Analysis
Policy 11(e)(i) *In addition, project design and mitigation will demonstrate how the following impacts are addressed:* *i. impacts on communities and individual dwellings, including, residential amenity, visual impact, noise and shadow flicker;*	**Technical Appendix 7.4** of the EIA Report summarises the findings of an assessment of effects on residential amenity within approximately 3km of the proposed turbines. Overall, it concludes that no visual effects would arise which would result in any dominant or overwhelming effects on residential visual amenity. Visual impact is addressed in relation to Policy 11(e)(ii) below. **Chapter 13: Noise** of the EIA Report sets out the methodology, assessment and subsequent findings of the noise impact assessment for the Proposed Development. It also takes into account the cumulative wind energy developments in the study area. The assessment concludes that wind turbine noise immission levels do not exceed the ESTU-R-97 criterion and thereby, the effects would be not significant. Potential shadow flicker effects have been considered within **Chapter 15: Other Considerations** of the EIA Report. The nearest residential receptor to the Proposed Development is located approximately 2.1km from Turbine 8, a distance of more than 11 times the rotor diameter of the proposed turbines (which is a minimum distance of setback from residential properties as advised by THC). Given the distance, it is considered that no shadow flicker effects from the Proposed Development would be experienced by residential receptors.
Policy 11(e)(ii) *In addition, project design and mitigation will demonstrate how the following impacts are addressed:* *ii. significant landscape and visual impacts, recognising that such impacts are to be expected for some forms of renewable energy. Where impacts are localised and/or appropriate design mitigation has been applied, they will generally be considered to be acceptable;*	**Technical Appendix 7.3** of the EIA Report sets out the Viewpoint Assessment of the Proposed Development. Significant adverse effects have been identified at four viewpoints: Viewpoint 2 (Edinbane Top Road); Viewpoint 4 (residents at Roag); Viewpoint 6 (Lonmore); and Viewpoint 12 (Greshornish), all of which lie within 7.5km of the Proposed Development. The landscape and visual assessment acknowledges that there would be some adverse effects experienced within parts of the two closer SLAs (North West Skye and Greshornish), including significant visual effects at particular viewpoints. However, given its location and the presence of existing operational wind farms, it concludes that views of the Proposed Development would not overall fundamentally conflict with the key characteristics of either designation. Overall, the viewpoint assessment concludes that the visual effects of the Proposed Development would be limited by the context, particularly in relation to operational and consented wind farms. The local landform of the surrounding undulating moorland would help to restrict views of the Proposed Development. There would also be a relationship with the operational Ben Aketil and Edinbane Wind Farms meaning the Proposed Development would be located within the space between them and would be seen in the same part of the view, rather than increasing the overall extent occupied by wind farms.

Relevant Policy Text (summarised where necessary)	Analysis
Policy 11(e)(iii) *In addition, project design and mitigation will demonstrate how the following impacts are addressed:* *iii. public access, including impact on long distance walking and cycling routes and scenic routes;*	**Chapter 7: Landscape and Visual** of the EIA Report includes an assessment of the visual effects that would be experienced by people when travelling along roads within the area and undertaking recreation within the study area. With the aid of representative viewpoints, the assessment looks at potential views from core paths within the study area, from hill walking within the Duirinish Peninsula, walking within the Trotternish Peninsula and along Skye Trail and within the Cuillins. The assessment also considered boat users within the Lochs of Dunvegan, Bracadale, Greshornish and Snizort Beag. With the exception of boat users within Loch Greshornish, no significant impacts are predicted on recreational users of the site and study area. With regard to boat users within Loch Greshornish, potential impacts would vary with location, with potential for significant effects towards the southern end of the Loch. Potential effects on users of the Uig – Lochmaddy/ Tarbet Ferry Route was also undertaken and concluded that potential effects would be minor and not significant. A potential link path from the proposed tracks to the nearby existing Edinbane Wind Farm access tracks would provide an accessible circular route from the settlement of Edinbane and help improve local public access facilities.
Policy 11(e)(iv) *In addition, project design and mitigation will demonstrate how the following impacts are addressed:* *iv. impacts on aviation and defence interests including seismological recording*	The topic of aviation is dealt with in **Chapter 15: Other Considerations** of the EIA Report. Consultation with aviation operators has been undertaken over the course of the project's development. Benbecula Airport have confirmed that the final design layout would not conflict with their safeguarding criteria. Consultation has identified that the Proposed Development may be visible on NATS radar at Tiree. An agreement is being entered into between NATS and the Applicant for the design and implementation of an identified and defined mitigation solution in relation to the Proposed Development. To address the issue raised by the MOD in response to Scoping, Aviation safety lighting (infrared, non-visible) is proposed to be attached to the turbines to ensure that no effects would result in low flying aircraft. It is considered that planning conditions relating to aviation and infra-red lighting for the Proposed Development could be employed to ensure no significant effects.

Relevant Policy Text (summarised where necessary)	Analysis
	Given the location of the Proposed Development, there is no impact on the Eskdalemuir seismological array.
Policy 11(e)(v) *In addition, project design and mitigation will demonstrate how the following impacts are addressed:* *v. impacts on telecommunications and broadcasting installations, particularly ensuring that transmission links are not compromised;*	Consultation has been undertaken with key stakeholders to identify relevant microwave links and Ultra High Frequency (UHF) telemetry links in the vicinity of the site. During the iterative design process, turbines have been moved in order to ensure that there would be no interference to identified transmission links as a result of the Proposed Development.
Policy 11(e)(vi) *In addition, project design and mitigation will demonstrate how the following impacts are addressed:* *vi. impacts on road traffic and on adjacent trunk roads, including during construction;*	**Chapter 12: Site Access, Traffic and Transport** of the EIA Report assesses the potential effects of the Proposed Development as a result of increased traffic flows in the study area arising from the construction of the Proposed Development. A cumulative assessment with three other wind farm sites in the study area has also been undertaken, as agreed with THC. No significant impacts are predicted related to site access, traffic and transport as a result of construction of the Proposed Development. A Framework Construction Traffic Management Plan (CTMP) has been prepared as **Technical Appendix 12.2** of the EIA Report which outlines mitigation measures recommended to be implemented during the construction phase. The Framework CTMP will be supplemented with additional information as appropriate by the Applicant's appointed contractor(s), prior to commencement of construction activities. Should consent be granted, the Framework CTMP would be updated to a CTMP, the content of which would be agreed with THC through consultation and enforced via a planning condition. The CTMP would be used during the construction phase of the Proposed Development to ensure traffic to, from and on the site is properly managed. It is possible that a collaborative approach with the assessed cumulative sites, and the projects which are understood will be submitted over the next year may be incorporated as part of the CTMP at a later date.
Policy 11(e)(vii) *In addition, project design and mitigation will demonstrate how the following impacts are addressed:* *vii. impacts on historic environment;*	The historic environment is discussed in further detail under Policy 7 below (**Table 3-7**).

Relevant Policy Text (summarised where necessary)	Analysis
Policy 11(e)(viii) *In addition, project design and mitigation will demonstrate how the following impacts are addressed:* *viii. effects on hydrology, the water environment and flood risk;*	**Chapter 10: Hydrology, Hydrogeology and Soils** of the EIA Report has assessed potential effects arising from construction and operation of the Proposed Development within 1km of the site boundary. It has been concluded that following the imposition of good practice measures and as a result of iterative design, that the Proposed Development is not likely to have any significant effects on the study area's hydrological or hydrogeological receptors. Published mapping confirms that most of the site is not located in an area identified as being at flood risk. A simple screening of potential flooding sources (fluvial, coastal, groundwater, infrastructure etc.) is presented in the EIA Report (**Table 10-9** within **Chapter 10**) and measures that would be used to control the rate and quality of runoff have been specified and would be included in the Construction and Environmental Management Plan (CEMP) at the detailed design stage of the project
Policy 11(e)(ix) *In addition, project design and mitigation will demonstrate how the following impacts are addressed:* *ix. biodiversity including impacts on birds;*	Biodiversity is discussed in further detail under Policy 3 below (**Table 3-3**).
Policy 11(e)(x) *In addition, project design and mitigation will demonstrate how the following impacts are addressed:* *x. impacts on trees, woods and forests;*	Trees, woods and forests are discussed in further detail under Policy 6 below (**Table 3-6**).
Policy 11(e)(xi) *In addition, project design and mitigation will demonstrate how the following impacts are addressed:*	It is proposed that the Balmeanach Wind Farm would be operational for a period of 40 years, subject to planning consent. At the end of its operational life, the Proposed Development and ancillary infrastructure would be decommissioned unless an application is submitted and approved to extend the operational period or to repower the site.

Relevant Policy Text (summarised where necessary)	Analysis
xi. proposals for the decommissioning of developments, including ancillary infrastructure, and site restoration;	The ultimate decommissioning protocol would be agreed with THC and other appropriate regulatory authorities in line with best practice guidance and requirements of the time. This would be done through the preparation and agreement of a Decommissioning and Restoration Plan (DRP). Financial provision for the decommissioning would be provided. It is anticipated that the DRP would be the subject of a planning condition and the decommissioning period would be expected to take up to one year.
Policy 11(e)(xii) *In addition, project design and mitigation will demonstrate how the following impacts are addressed:* *xii. the quality of site restoration plans including the measures in place to safeguard or guarantee availability of finances to effectively implement those plans;*	Proposals for site restoration post construction are set out in **Technical Appendix 3.1 (CEMP)**. It is anticipated that most of the soil resources within areas directly affected by construction activities would be able to be stored and reinstated as close as possible to where they were excavated in accordance with best practice; so that the site would be restored with minimal movement of material from its original location. Site restoration at the end of the operational life of the wind farm has been discussed in relation to Policy 11(e)(xi). It is expected that a DRP would be prepared in liaison with THC and regulatory authorities at the time of decommissioning and that a financial provision for decommissioning would be provided. It is expected that a planning condition would be applied to any planning consent in this regard.
Policy 11(e)(xiii) *In addition, project design and mitigation will demonstrate how the following impacts are addressed:* *xiii. cumulative impacts.*	In accordance with the EIA Regulations, the assessment has considered 'cumulative effects' in relation to the topics of landscape and visual, noise, traffic and transport, ornithology and cultural heritage. A list of cumulative developments is provided in **Table 5-2** in **Chapter 5: Environmental Impact Assessment** of the EIA Report. No significant cumulative effects have been identified arising from the Proposed Development along with other operational, consented and submitted developments as of the end of May 2023 as set out in **Table 5-2** of the EIA Report.

Policy 3: Biodiversity

94. Policy 3 plays an important role in ensuring that development will secure positive effects on biodiversity. It seeks to rebalance the planning system in favour of conserving, restoring and enhancing biodiversity and promotes investment in nature-based solutions, benefiting people and nature.

95. Policy 3(a) states that:

"*Development proposals will contribute to the enhancement of biodiversity, including where relevant, restoring degraded habitats and building and strengthening nature networks and the connections between them. Proposals should also integrate nature-based solutions, where possible*."

96. Policy 3(b) states that:

"*Development proposals for national, major or Environmental Impact Assessment (EIA) development will only be supported where it can be demonstrated that the proposal will conserve, restore and enhance biodiversity, including nature networks, so they are in a demonstrably better state than without intervention*."

97. Pat (b) continues and sets five criteria that development proposals for such development proposals will be required to meet. These criteria are considered in **Table 3-3**.

98. In consideration of the Proposed Development against Policy 3(b), it should be noted that at the time of writing, no guidance is available on how "*significant biodiversity enhancements*" are to be measured and assessed in terms of policy 3(b). In the Chief Planner letter dated February 2023, it states that "*currently there is no single accepted methodology for calculating and / or measuring biodiversity 'enhancement' – we have commissioned research to explore options for developing a biodiversity metric or other tool, specifically for use in Scotland."* Timescales for the release of this methodology are unclear.

99. The ecological and ornithological assessment of the Proposed Development has been based on a suite of desk-based research and field based surveys, the latter undertaken over a period of years to understand the site's ecological characteristics and context. Assessment of the Proposed Development on ecological receptors has been based on information gleaned from this comprehensive desk-based and field-based research and survey.

100. The EIA Report states that following mitigation, there would be no significant residual effects upon ecological or ornithological receptors. In line with the mitigation hierarchy, the Proposed Development has been subject to a number of design iterations in response to the constraints identified as part of the baseline studies, further detail of which is available in **Chapter 2: Site Description and Design Evolution** of the EIA Report. Where effects were unavoidable, the next stages in the EIA process involved minimising identified effects and restoring damaged habitats before looking to offset any adverse residual effects.

101. **Chapter 8: Ecology** of the EIA Report predicts that up to 35.45ha of peatland habitat (blanket bog, wet heath and dry heath) would be permanently or temporarily lost as result of the Proposed Development. As there is limited opportunity for enhancement within the site, the outline Habitat Management Plan (HMP) for the Proposed Development seeks to restore approximately 77.75ha of peatland habitat within the afforested area to the north west of the site, providing connectivity to the adjacent consented Habitat Management Areas (HMAs) for Ben Sca Wind Farm and Ben Sca Wind Farm Extension. The area proposed for peatland restoration is considered to be a degraded habitat due to

inappropriate tree planting in the past. This level of peatland restoration is considered to be sufficient to compensate for the loss of peatland habitat as a result of the Proposed Development. It is also considered to provide a sufficient level of additional biodiversity enhancement (i.e. over and above offsetting) to satisfy the requirements of NPF4 Policy 3.

102. It is also considered that the proposed peatland restoration would provide the opportunity to 'bolt on' to the restoration areas proposed for the consented Ben Sca Wind Farm and its Extension, enhancing priority habitats and their habitat connectivity.

103. It is proposed that further details of this peatland restoration and enhancement would be provided in a detailed HMP which would be produced and agreed post consent with the THC, in consultation with NatureScot, prior to the commencement of development. The agreement of this detailed HMP by planning condition can ensure that a suitable biodiversity compensation and enhancement is provided by the Applicant.

104. It should also be noted that as a renewable energy development, the Proposed Development would principally make a contribution to reducing climate change by facilitating the move away from fossil-fuel based energy generation. By its very nature, the Proposed Development would therefore make a contribution to net zero which would in turn benefit biodiversity, the focus of this policy.

105. Overall, it is therefore considered that the Proposed Development would bring about biodiversity enhancement through the HMP that would leave the environment in a demonstrably better state than without intervention and is therefore in accordance with Policy 3.

Table 3-3: Analysis of NPF4 Policy 3 against the Proposed Development

Relevant Policy Text (summarised where necessary)	Analysis
a) Development proposals will contribute to the enhancement of biodiversity, including where relevant, restoring degraded habitats and building and strengthening nature networks and the connections between them. Proposals should also integrate nature-based solutions, where possible. *b) Development proposals for national or major development, or for development that requires an Environmental Impact Assessment will only be supported where it can be demonstrated that the proposal will conserve, restore and enhance biodiversity, including nature networks so they are in a demonstrably better state than without intervention. This will include future management. To inform this, best practice assessment methods should be used. Proposals within these categories will demonstrate how they have met all of the following criteria:* *i) the proposal is based on an understanding of the existing characteristics of the site and its local, regional and national ecological context prior to development, including the presence of any irreplaceable habitats;* *ii) wherever feasible, nature-based solutions have been integrated and made best use of;* *iii) an assessment of potential negative effects which should be fully mitigated in line with the mitigation hierarchy prior to identifying enhancements;*	**Chapter 8: Ecology** and **Chapter 9: Ornithology** of the EIA Report have been compiled following a desk based and field-based survey of the Proposed Development site. The desk-based assessment provided information on the local, regional and national ecological context which was further supplemented by field-based surveys and consultation. Ecological field-based surveys undertaken include: ○ UK Habitat Classification Survey ○ National Vegetation Classification (NVC) Survey ○ Fish Habitat Assessment ○ Mammal Survey ○ Bat Survey Ornithological field-based surveys undertaken include: ○ Flight activity surveys ○ Breeding wader surveys ○ Breeding raptor surveys ○ Lochan surveys for breeding divers This suite of surveys, undertaken over several years and in accordance with consultee requirements has led to an in-depth understanding of the site, its characteristics and ecological context. In line with the mitigation hierarchy, the Proposed Development has been subject to an extensive design iteration process in response to the constraints identified as part of baseline studies undertaken on the site. This has included revising the location of turbines and infrastructure to avoid areas of deeper peat and areas considered to be ecologically sensitive. Further detail is available in **Chapter 2: Site Description and Design Evolution** of the EIA Report.

Relevant Policy Text (summarised where necessary)	Analysis
iv) significant biodiversity enhancements are provided, in addition to any proposed mitigation. This should include nature networks, linking to and strengthening habitat connectivity within and beyond the development, secured within a reasonable timescale and with reasonable certainty. Management arrangements for their long-term retention and monitoring should be included, wherever appropriate; and *v) local community benefits of the biodiversity and/or nature networks have been considered.* *d) Any potential adverse impacts, including cumulative impacts, of development proposals on biodiversity, nature networks and the natural environment will be minimised through careful planning and design. This will take into account the need to reverse biodiversity loss, safeguard the ecosystem services that the natural environment provides, and build resilience by enhancing nature networks and maximising the potential for restoration.*	Due to the majority of the site comprising Annex 1 habitat, it was not possible to avoid these areas during the design of the Proposed Development however, flush habitats, watercourses, areas of deepest peat and sensitive bog pool habitat have been avoided as far as possible and track length was minimised as far as possible to minimise land take. Nevertheless, a significant negative effect has been predicted from construction of the Proposed Development related to the permanent loss of up to 35.45ha of peatland habitat. The outline HMP (Technical Appendix 8.5) includes for up to 77.75ha of peatland habitat which would offset (compensate) for this habitat loss as well as providing additional significant biodiversity enhancement alongside the HMAs for Ben Sca and Extension Wind Farms, to satisfy the requirements of this policy. The effectiveness of the restoration (to achieve both offsetting and enhancement) would be monitored to establish if any remedial action is required. This would ensure that the adopted habitat enhancement actions are measurable against biodiversity gain. With regard to ornithology, the assessment of effects concluded that, with the implementation of good practice measures, there would be no significant effects predicted on Important Ornithological Features (IOFs) as a result of the Proposed Development. Good practice measures would be employed to reduce the possibility of damage and destruction (and disturbance in the case of sensitive species such as breeding raptors and waders), to occupied bird nests during the construction phase. A programme of post-construction bird monitoring (including collision monitoring, flight activity surveys, breeding raptor surveys and carcass searching) is proposed in liaison with the adjacent consented wind farms to gather valuable data. It is also proposed that a close collaboration with the Highland Raptor Study Group is established in order to facilitate a research programme aimed at furthering understanding of white-tailed eagle and golden eagle population prospects in the light of an increasing number of renewable energy projects on the Isle of Skye.

Policy 4: Natural Places

106. This policy provides the basis for assessing developments against the natural environment, including European designations, national designations such as national parks and local designations.

107. Through a review of this policy against the Proposed Development (**Table 3-4**), it can be considered that the Proposed Development accords with this policy. No significant impacts are predicted as a result of the Proposed Development on the 'natural places' referred to in this policy.

Table 3-4: Analysis of NPF4 Policy 4 against the Proposed Development

Relevant Policy Text (summarised where necessary)	Analysis / Where Addressed in EIA Report
"a) Development proposals which by virtue of type, location or scale will have an unacceptable impact on the natural environment, will not be supported." *"b) Development proposals that are likely to have a significant effect on an existing or proposed European site (Special Area of Conservation or Special Protection Areas) and are not directly connected with or necessary to their conservation management are required to be subject to an "appropriate assessment" of the implications for the conservation objectives."* *"c) Development proposals that will affect a National Park, National Scenic Area, Site of Special Scientific Interest or a National Nature Reserve will only be supported where:* *i) The objectives of designation and the overall integrity of the areas will not be compromised; or* *ii) Any significant adverse effects on the qualities for which the area has been designated are clearly outweighed by social, environmental or economic benefits of national importance."* *"d) Development proposals that affect a site designated as a local nature conservation site or landscape area in the LDP will only be supported where:* *i) Development will not have significant adverse effects on the integrity of the area or the qualities for which it has been identified; or* *ii) Any significant adverse effects on the integrity of the area are clearly outweighed by social, environmental or economic benefits of at least local importance."*	Potential effects on SACs and SSSIs have been scoped out of assessment as the features that these sites have been designated for are not predicted to be impacted by the Proposed Development. Further information on this is available in **Chapter 8: Ecology** and **Chapter 9: Ornithology** of the EIA Report. The site is not located with a National Park and the study area for the Proposed Development does not include a National Park. Trotternish NSA lies approximately 18km north east of the site and Cuillin Hills NSA lies approximately 22km south east of the site. **Figure 7.7** of the EIA Report sets out a Zone of Theoretical Visibility of the Proposed Development from each of the NSAs and identifies that there would be very limited visibility of the Proposed Development from both of the NSAs. It was considered that there would be minor to negligible landscape and visual effects on the Trotternish and Cuillin Hills NSA and the Proposed Development would not compromise its key characteristics. An Cleireach SSSI which has been designated for its geological features (Tertiary Igneous) is adjacent to the site. There will however be no impacts on this SSSI. No non-statutory designated sites for nature conservation have been identified within a 5km radius of the site and were scoped out of assessment as they are considered unlikely to be affected by the Proposed Development. Northwest Skye Special Landscape Area (SLA) sits approximately 4.7km to the west of the site. **Figure 7.7** of the EIA Report identifies that the Proposed Development would be screened from the majority of the SLA, with much of the ZTV coverage occurring on the sea and not land. Following assessment, it was concluded that that there would be minor to moderate landscape and visual effects on the Northwest Skye Special Landscape Area (SLA) and the Proposed Development would not compromise its key characteristics.

Relevant Policy Text (summarised where necessary)	Analysis / Where Addressed in EIA Report
"f) Development proposals that are likely to have an adverse effect on species protected by legislation will only be supported where the proposal meets the relevant statutory tests. If there is reasonable evidence to suggest that a protected species is present on a site or may be affected by a proposed development, steps must be taken to establish its presence. The level of protection required by legislation must be factored into the planning and design of development, and potential impacts must be fully considered prior to the determination of any application. *g) Development proposals in areas identified as wild land in the Nature Scot Wild Land Areas map will only be supported where the proposal:* *i) will support meeting renewable energy targets; or,* *ii) is for small scale development directly linked to a rural business or croft, or is required to support a fragile community in a rural area.* *All such proposals must be accompanied by a wild land impact assessment which sets out how design, siting, or other mitigation measures have been and will be used to minimise significant impacts on the qualities of the wild land, as well as any management and monitoring arrangements where appropriate. Buffer zones around wild land will not be applied, and effects of development outwith wild land areas will not be a significant consideration."*	Greshornish SLA sits approximately 5km to the north of the site and **Figure 7.7** of the EIA Report identifies that there would be theoretical visibility of the Proposed Development from much of the Greshornish SLA although a key attribute of the designation relates to the landform sloping towards the sea, away from the site. The assessment as set out in **Chapter 7: Landscape and Visual** of the EIA Report concludes that there would be potential for a significant adverse effect on this SLA. It is important to note however that the assessment concludes that neither the special qualities nor integrity of the SLA designation would be affected. As set out in **Chapter 8: Ecology** and **Chapter 9: Ornithology**, with the imposition of recommended mitigation measures, no significant adverse effects on protected species are predicted as a result of the Proposed Development. The site is not located within a NatureScot Wild Land Area (WLA). The two WLAs within the wider study area, Duirinish and Cuillin, are assessed in **Chapter 7: Landscape and Visual** with the conclusion that the Proposed Development would not have a significant effect on either of the WLA's and their associated key qualities and attributes.

Policy 5: Soils

108. The policy intent of Policy 5 is to "p*rotect carbon-rich soils, restore peatlands and minimise disturbance to soils from development*."

109. Policy 5(c) introduces a list of developments which will be supported on carbon-rich and priority peatland habitat of which renewable energy generation sources are included. It is therefore considered that the principle of the Proposed Development on peatland habitat, which extensively covers the Proposed Development site, is supported and the development is in compliance with Policy 5(c)(ii).

110. Through an iterative design process informed by a comprehensive suite of peat probing data, peat depth and peat stability have formed a key consideration for the positioning and layout of turbines and associated infrastructure. This has resulted in a proposed layout that has sought to minimise the amount of disturbance to areas of deep peat or areas at risk of peat slide.

111. Notwithstanding the above, the Proposed Development would lead to the direct and indirect loss of up to 27.01ha of blanket bog. The restoration of approximately 77.75ha of peatland habitats (see **Technical Appendix 8.5: OHMP of the EIA report**) is proposed to provide offsetting (compensation) for this habitat loss as well to provide for significant biodiversity enhancement.

112. Through the application of the mitigation hierarchy to the design of the Proposed Development around peat and soils and the proposals for compensation and enhancement related to peatland including best practice measures during construction, not to mention the contribution of the Proposed Development to carbon-emissions reductions, the Proposed Development is considered to be in compliance with Policy 5 as set out in **Table 3-5**.

Table 3-5: Analysis of NPF4 Policy 5 against the Proposed Development

Relevant Policy Text (summarised where necessary)	Analysis / Where Addressed in EIA Report
"a) Development proposals will only be supported if they are designed and constructed: *i) In accordance with the mitigation hierarchy by first avoiding and then minimising the amount of disturbance to soils on undeveloped land; and* *ii) In a manner that protects soil from damage including from compaction and erosion, and that minimises soil sealing."* *"c) Development proposals on peatland, carbon-rich soils and priority peatland habitat will only be supported for:* *i) Essential infrastructure and there is a specific locational need and no other suitable site;* *ii) The generation of energy from renewable sources that optimises the contribution of the area to greenhouse gas emissions reductions targets;* *iii) Small-scale development directly linked to a rural business, farm or croft;* *iv) Supporting a fragile community in a rural or island area; or* *v) Restoration of peatland habitats.* *d) Where development on peatland, carbon-rich soils or priority peatland habitat is proposed, a detailed site specific assessment will be required to identify:* *i) the baseline depth, habitat condition, quality and stability of carbon rich soils;* *ii) the likely effects of the development on peatland, including on soil disturbance; and* *iii) the likely net effects of the development on climate emissions and loss of carbon.*	The entire site can be considered to be extensively covered in peat with a maximum recorded thickness of 4.7m on the flatter areas and peat presence, thickness and stability has formed a key consideration in the design of the Proposed Development. An extensive programme of peat probing has been undertaken across the site to assess the depth and stability of carbon rich soils. This has been supplemented by a walk-over survey and a thorough inspection of digital terrain mapping and aerial photography. An ecological assessment of peat and its associated habitats has also been completed. At various points during design development, fieldwork has been undertaken to provide feedback to the project team with regards to peat depth and stability at locations of proposed infrastructure which fed into the iterative design of the Proposed Development. In accordance with the mitigation hierarchy and the inability to totally avoid peat, the design principle followed for the Proposed Development has been to try to avoid any areas of peat greater than 1m (with no infrastructure proposed within areas of 1.5m peat depth or greater) with the aim to position the majority of the infrastructure within areas less than 0.5m depth. The depth of peat at the proposed turbine locations varies from 0.3m to 1.2m. In addition, all turbine locations, access tracks, the substation compound, the construction compound and borrow pits have been designed to avoid any areas which may be subject to peat slide risk. This is discussed in **Technical Appendix 10.1: Peat Stability Assessment of the EIA Report** and shown on **Figures 10.1.6** and **10.1.7** of **Technical Appendix 10.1**. An assessment of the likely impacts of the Proposed Development on peat is contained within **Chapter 10: Hydrology, Hydrogeology and Soils** of the EIA Report. It concludes that subject to best practice construction techniques being implemented, impacts on soils are not considered to be significant.

Relevant Policy Text (summarised where necessary)	Analysis / Where Addressed in EIA Report
This assessment should inform careful project design and ensure, in accordance with relevant guidance and the mitigation hierarchy, that adverse impacts are first avoided and then minimised through best practice. A peat management plan will be required to demonstrate that this approach has been followed, alongside other appropriate plans required for restoring and/ or enhancing the site into a functioning peatland system capable of achieving carbon sequestration.	Measures have been proposed to ensure the stability of peat and carbon rich soils and that peat and soils that would be disturbed by the Proposed Development can be safeguarded and beneficially re-used on site. These measures are set out in **Technical Appendix 10.1 (PLHRA)** and **10.2 (PMP)** of the EIA Report. The results of the carbon calculator conclude that the Proposed Development is expected to have an overall net positive impact over its 40 year lifespan and is expected to generate 38 years of carbon-free energy which would result in 2.9 million tonnes of CO_2 emissions savings compared to a fossil fuel mix of electricity generation. In addition, restoration and enhancement of peatland habitats is proposed as part of the Proposed Development. Habitat restoration proposals involve the restoration of c. 77.75ha of peatland habitat, through conifer plantation felling and peatland restoration and management activities (details are provided within **Technical Appendix 8.5: Outline HMP** of the EIA Report).

Policy 6: Forestry, Woodland and Trees

113. The policy intent of Policy 6 is to *"protect and expand forests, woodland and trees."*

114. As part of the Proposed Development, it is intended to remove up to 77.75ha of woodland to allow for restoration to peatland habitat. **Technical Appendix 3.3** of the EIA Report has assessed the suitability of woodland within the site for conversion from forest to bog as part of the proposed OHMP for the Proposed Development and concluded that due to the low yield, poor growth rates and the presence of a large number of dead trees, that the site is deemed unsuitable for productive forestry.

115. In addition, in assessing the woodland removal against the requirements of the Scottish Governments Control of Woodland Removal Policy (2009) (CoWRP) and Forestry Commission guidance 'Deciding future management options for afforested deep peatland' (2015), it was considered that restoration (enhancing priority habitats, in this case blanket bog and its connectivity to surrounding priority habitats), indicate that the proposal to fell without the need for restocking is appropriate at this site.

116. It is considered that the ecological benefits of woodland removal to facilitate peatland restoration and provide associated biodiversity mitigation and enhancement measures for the site are an important consideration, particularly on sites that are deemed as "*less suitable for second rotation forestry.*" (Forestry Commission, 2015). On this basis, it is considered that these benefits justify the loss of woodland and thereby the Proposed Development is considered to comply with Policy 6 as set out in **Table 3-6**.

Table 3-6: Analysis of NPF4 Policy 6 against the Proposed Development

Relevant Policy Text (summarised where necessary)	Analysis / Where Addressed in EIA Report
a) Development proposals that enhance, expand and improve woodland and tree cover will be supported. *b) Development proposals will not be supported where they will result in:* *i) Any loss of ancient woodlands, ancient and veteran trees, or adverse impact on their ecological condition;* *ii) Adverse impacts on native woodlands, hedgerows and individual trees of high biodiversity value, or identified for protection in the Forestry and Woodland Strategy;* *iii) Fragmenting or severing woodland habitats, unless appropriate mitigation measures are identified and implemented in line with the mitigation hierarchy;* *iv) Conflict with Restocking Direction, Remedial Notice or Registered Notice to Comply issued by Scottish Forestry.* *c) Development proposals involving woodland removal will only be supported where they will achieve significant and clearly defined additional public benefits in accordance with relevant Scottish Government policy on woodland removal. Where woodland is removed, compensatory planting will most likely be expected to be delivered.* *d) Development proposals on sites which include an area of existing woodland or land identified in the Forestry and Woodland Strategy as being suitable for woodland creation will only be supported where the enhancement and improvement of woodlands and the planting of new trees on the site (in accordance with the Forestry and Woodland Strategy) are integrated into the design.*	There are no areas of ancient woodland, ancient or veteran trees within the Proposed Development site. There are no native woodlands, hedgerows and individual trees of high biodiversity value, or identified for protection in the Forestry and Woodland Strategy within the Proposed Development site. It is proposed that up to 77.75ha of woodland could be removed from the site to allow for restoration to peatland habitat. **Technical Appendix 3.3** of the EIA Report has looked at the suitability of woodlands within the site for conversion from forest to bog as part of the proposed Outline Habitat Management Plan for the Proposed Development. It was identified that the compartments proposed for restoration have particularly low Yield Class for their species due to the high exposure and the fact that they are mostly located on nutrient poor unflushed blanket bog where peat depths regularly exceed 0.5m and in many areas are more than 1m. Approximately 20.5ha of the 77.75ha of woodland to be removed comprises dead trees most likely caused by the fire which occurred on the site in 2018. In assessing the proposed woodland removal against the requirements of the Scottish Governments Control of Woodland Removal Policy (2009) (CoWRP) and Forestry Commission guidance 'Deciding future management options for afforested deep peatland' (2015), it was considered that the very low yield class of the trees, the depth of peat on site and the clear benefits of restoration (enhancing priority habitats, in this case blanket bog and its connectivity to surrounding priority habitats), indicate that the proposal to fell without the need for restocking is appropriate at this site. In addition, the CoWRP sets out a list of woodlands that there is a strong presumption against removal, none of which are applicable to the woodland to be removed from the development site.

Policy 7: Historic Assets and Places

117. The policy intent of Policy 7 is to protect and enhance historic environment assets and places, and to enable positive change as a catalyst for the regeneration of places.

118. **Chapter 7: Landscape and Visual** and **Chapter 11: Cultural Heritage and Archaeology** of the EIA Report have assessed the potential impact of the Proposed Development on historic environment assets and places within the study area of the Proposed Development.

119. It has been concluded that all effects identified are consistent with the lowest level of effect identified within the SNH (NatureScot) and HES EIA Handbook 2018. There are no predicted significant effects on cultural heritage assets resulting from the construction or operation of the Proposed Development. It is considered that the Proposed Development is compliant with Policy 7 as set out in **Table 3-7**.

Table 3-7: Analysis of NPF4 Policy 7 against the Proposed Development

Relevant Policy Text (summarised where necessary)	Analysis / Where Addressed in EIA Report
"a) Development proposals with a potentially significant impact on historic assets or places will be accompanied by an assessment which is based on an understanding of the cultural significance of the historic asset and/or place. The assessment should identify the likely visual or physical impact of any proposals for change, including cumulative effects and provide a sound basis for managing the impacts of change." *Proposals should also be informed by national policy and guidance on managing change in the historic environment, and information held within Historic Environment Records.* h) Development proposals affecting scheduled monuments will only be supported where: *i) direct impacts on the scheduled monument are avoided;* *ii) significant adverse impacts on the integrity of the setting of a scheduled monument are avoided; or* *iii) exceptional circumstances have been demonstrated to justify the impact on a scheduled monument and its setting and impacts on the monument or its setting have been minimised.* *i) Development proposals affecting nationally important Gardens and Designed Landscapes will be supported where they protect, preserve or enhance their cultural significance, character and integrity and where proposals will not significantly impact on important views to, from and within the site, or its setting.* *j) Development proposals affecting nationally important Historic Battlefields will only be supported where they protect and, where appropriate, enhance their cultural significance, key landscape characteristics, physical remains and special qualities.*	**Chapter 11: Cultural Heritage and Archaeology** of the EIA Report assesses the effects of construction and operation of the Proposed Development on the cultural heritage assets of the site and surrounding area. This assessment has determined that there would be no direct impacts on Scheduled Monuments and that the changes in setting affecting the monument would not have a significant adverse effect on the integrity of the setting of any Scheduled Monuments. Effects on nationally important Gardens and Designed Landscapes have not been undertaken for the Proposed Development. Dunvegan Castle and Garden fall outwith the ZTV and the Proposed Development is not anticipated to be visible from this asset. There are no Historic Battlefields within the study area for the Proposed Development. They have been scoped out of assessment on this basis. There is potential for a direct impact on five non-designated cultural heritage assets within the site boundary although these have been avoided through careful design. **Figure 11.1a-b** of the EIA Report provides an illustration of the location of the assets in relation to proposed infrastructure. It should be noted that these assets are considered to be of low/negligible cultural significance. As a result, there is not predicted to be significant effects as a result of Proposed Development on non-designated historic environment assets within the site. Mitigation measures have been proposed including fencing off and avoidance of the five known assets to reduce the potential of accidental damage during construction and a targeted watching brief during groundworks adjacent to four of the known assets.

Relevant Policy Text (summarised where necessary)	Analysis / Where Addressed in EIA Report
o) Non-designated historic environment assets, places and their setting should be protected and preserved in situ wherever feasible. Where there is potential for non-designated buried archaeological remains to exist below a site, developers will provide an evaluation of the archaeological resource at an early stage so that planning authorities can assess impacts. Historic buildings may also have archaeological significance which is not understood and may require assessment.	The archaeological mitigation measures proposed would minimise the potential loss of the archaeological resource that could occur as a result of the construction of the Proposed Development. Any harm caused to buried remains would be offset by the gain in knowledge resulting from investigation and reporting.

Policy 14: Design, Quality and Place

120. Policy 14 sits within the 'Liveable Places' section of NPF4 with the policy intent of encouraging, promoting and facilitating "*well designed development that makes successful places by taking a design-led approach and applying the Place Principle.*"

121. The Proposed Development has been designed to make best use of the available wind resource on the site and to take important environmental considerations into account. Other criteria listed under Policy 14 are not considered to be relevant. Overall, it is concluded that the Proposed Development is in accordance with this policy in so far as it is relevant (**Table 3-8**).

Table 3-8: Analysis of NPF4 Policy 14 against the Proposed Development

Relevant Policy Text (summarised where necessary)	Analysis / Where Addressed in EIA Report
a) Development proposals will be designed to improve the quality of an area whether in urban or rural locations and regardless of scale. *b) Development proposals will be supported where they are consistent with the six qualities of successful places:* ***Healthy:** Supporting the prioritisation of women's safety and improving physical and mental health.* ***Pleasant:** Supporting attractive natural and built spaces.* ***Connected:** Supporting well connected networks that make moving around easy and reduce car dependency* ***Distinctive:** Supporting attention to detail of local architectural styles and natural landscapes to be interpreted, literally or creatively, into designs to reinforce identity.* ***Sustainable**: Supporting the efficient use of resources that will allow people to live, play, work and stay in their area, ensuring climate resilience, and integrating nature positive, biodiversity solutions.* ***Adaptable:** Supporting commitment to investing in the long-term value of buildings, streets and spaces by allowing for flexibility so that they can be changed quickly to accommodate different uses as well as maintained over time.* *Further details on delivering the six qualities of successful places are set out in Annex D.* *c) Development proposals that are poorly designed, detrimental to the amenity of the surrounding area or inconsistent with the six qualities of successful places, will not be supported*	A Preliminary Access Management Plan (PAMP) has been developed for the Proposed Development and accompanies the EIA Report as **Technical Appendix 14.2**. Whilst the primary purpose of the PAMP is to outline how the Applicant would manage public access during the construction, operation and decommissioning of the Proposed Development, it is envisaged that the PAMP would provide a means for discussion with landowners and consultees in order to create opportunities for informal recreational use of the site by local communities whilst also providing opportunities to appreciate the natural environment in which the Proposed Development is located. Outline examples are provided within the PAMP of proposals to facilitate public access to the wind farm site including use of interpretation boards, potential new routes of access within the area and management of access. It is envisaged that the PAMP would be finalised into the form of an Access Management Plan (AMP) following consultation with landowners and stakeholders, should the Proposed Development be consented.

Policy 23: Health and Safety

122. The policy intent of Policy 23 is to "*protect people and places from environmental harm, mitigate risks arising from safety hazards and encourage, promote and facilitate development that improves health and wellbeing*." It also sits within the 'Liveable Places' section of NPF4.

123. The considerations of this policy which are considered relevant to the Proposed Development relate to positive health effects arising from opportunities for enhanced informal recreation on the wind farm site. It is also considered that noise is a relevant consideration of this policy.

124. The analysis set out in **Table 3-9** is considered to demonstrate the Proposed Development complies with the relevant sections of Policy 23.

Table 3-9: Analysis of NPF4 Policy 23 against the Proposed Development

Relevant Policy Text (summarised where necessary)	Analysis / Where Addressed in EIA Report
a) Development proposals that will have positive effects on health will be supported. This could include, for example, proposals that incorporate opportunities for exercise, community food growing or allotments. *e) Development proposals that are likely to raise unacceptable noise issues will not be supported. The agent of change principle applies to noise sensitive development. A Noise Impact Assessment may be required where the nature of the proposal or its location suggests that significant effects are likely.*	As set out in **Table 3-8**, a PAMP has been developed for the Proposed Development. It is therefore considered that the Proposed Development, subject to agreement of the PAMP, would facilitate positive effects on health by incorporating access tracks that provide opportunities for exercise. Commentary in relation to noise is set out against Policy 11(e) (in **Table 3-2**). It states that no unacceptable effects in terms of noise would be introduced by the Proposed Development.

NPF4 Conclusions

125. Policy 11 is the key topic specific policy for the assessment of the Proposed Development. In principle it is supportive of a wind farm on this site given it is not with a National Park or National Scenic Area. The identified significant landscape and visual impacts are localised and contained whilst the design of the project has sought to minimise the impacts of a wind farm in this location as far as possible. It is therefore considered that these impacts fall with the parameters of part (e) section (ii) of Policy 11. The Proposed Development is also considered to be in compliance in relation to all of Policy 11's other environmental and technical topic criteria, with the contribution of the Proposed Development towards renewable energy generation targets and on greenhouse gas emissions targets drawing significant support from this policy. These benefits are also of particular relevance in drawing support from Policy 1, which gives significant weight to the global climate crisis. The intent of Policy 1 is to encourage, promote and facilitate development that addresses the global climate crisis, and this proposal would contribute to that objective.

126. Overall, it is considered that Proposed Development would accord with relevant policies of NPF4, and with NPF4 when read as a whole.

3.2.2 The Local Development Plan

127. The Local Development Plan for the Proposed Development comprises the adopted Highland Wide Local Development Plan (HwLDP) (2012), the adopted West Highlands and Islands Local Development Plan (WestPlan) and relevant supplementary guidance, including the Onshore Wind Energy Supplementary Guidance (OWESG) (2016).

128. While the OWESG still forms part of the Development Plan, NPF4 has now removed the previously adopted spatial framework for Onshore Wind Farms and replaced it with a strategic spatial strategy which supports onshore wind energy generation and associated grid infrastructure in Scotland.

129. Although the OWESG does not provide any new or separate policy tests to those in the HwLDP, it does provide a clear indication of the approach of THC towards the assessment of onshore wind energy proposals. In particular, it provides a methodology for judgement to be made on the likely impact of a development on assessed "thresholds" in order to assist in the application of HwLDP Policy 67. An appraisal of how the Proposed Development meets with the thresholds set out in the criteria is included in **Table 7-17** of **Chapter 7: Landscape and Visual** of the EIA Report.

130. As NPF4 has now been adopted and forms part of the Development Plan, it is noted by THC that this will likely reduce the number and range of policies that they require in their new Local Development Plan. THC contributed into the preparation of NPF4 and now expect to take forward review of the HwLDP under the new arrangements for Local Development Plans (LDPs) with a focus on land allocation through the spatial strategy and interpreting national policy in a local context, with formal work starting in Spring 2023.

131. Currently therefore, the adopted HwLDP is considered to be the relevant LDP, however, NPF4 is clear that where there is any incompatibility between the National Planning Framework and a provision of the LDP that whichever of them is the later in date is to prevail.

132. There are no site-specific policies relating to the site in WestPlan, the plan only being relevant to the Proposed Development from a broad policy perspective. Consequently, the primary Development Plan policy for assessment of the Proposed Development is Policy 67 of the HwLDP which specifically relates to renewable energy. This policy is therefore considered first in this assessment followed by a consideration of other relevant policies in the HwLDP.

3.2.3 HwLDP Policy 67

133. HwLDP Policy 67 requires consideration to be given to the contribution of the development towards renewable energy targets; positive and negative effects on the local and national economy; and other material considerations, including proposals able to demonstrate significant benefits by making effective use of existing and proposed infrastructure and facilities. Within this framework the policy states that the Planning Authority will support proposals where it is satisfied that they are located, sited, and designed in such a way as to ensure that they will not be significantly detrimental overall, either individually or cumulatively with other developments. It states that in this regard specific consideration is to be given to the following criteria:

- Natural, Built and Cultural Heritage;
- Species and Habitats;
- Landscape and Visual Impact;
- Amenity at Sensitive Locations;

- Safety and Amenity of Individuals and Individual Properties;
- The Water Environment;
- Safety of Airport, Defence and Emergency Service Operations;
- The Operational Efficiency of Other Communications;
- Public Access;
- Other Tourism and Recreation Interests; and
- Traffic and Transport.

134. The wording of HwLDP Policy 67 provides that if THC is satisfied that there will be no significant detrimental impact overall, then the application will accord with the Development Plan.

135. It is however considered that Policy 67 is incompatible with the provisions of NPF4 particularly with regard to landscape and visual impact as NPF4 states that "w*here* (landscape and visual) *impacts are localised and/ or appropriate design mitigation has been applied, they will generally be considered to be acceptable".* Policy 11(e)(ii) now makes it clear that there is an expectation for landscape and visual impacts arising from certain forms of renewable energy development, of which this development is considered to apply. Rather than making a judgement call on the acceptability of impacts arising from a Proposed Development (from a landscape and visual perspective), should landscape and visual impacts be considered localised and / or deemed to have incorporated appropriate mitigation, the scheme should be considered acceptable. This conclusion is in accordance with recent appeal decisions, for example for Meall Buidhe Wind Farm (PPA-270-2277).

136. The contribution of the Proposed Development towards meeting renewable energy generation targets and the positive effects that the Proposed Development would have on the local and national economy are set out in **Section 2.4** of this Planning Statement. Other ecological, public access and socioeconomic benefits that the Proposed Development would have, are also summarised in **Section 2.4**. As identified in **Section 2.2** of this Planning Statement, the Proposed Development would make effective use of the existing Ben Aketil access tracks, and consented Ben Sca access tracks.

137. As NPF4 represents the most up-to-date policy position, an assessment against each of the topics set out in HwLDP Policy 67 has been undertaken as part of an assessment of the Proposed Development against NPF4 and indication of where these assessments have been set out in this document are set out in **Table 3-10**. A review of the other relevant policies of the HwLDP and where they are assessed in this Planning Statement are set out in **Table 3-11**.

Table 3-10: Location of Assessment Topics related to HwLDP Policy 67

HwLDP Policy 67	
Criteria	**Location of Analysis**
Natural, Built and Cultural Heritage	Ecology & Ornithology: **Tables 3-2 & 3-3** Natural Places: **Tables 3-2 & 3-4** Soils: **Tables 3-2 & 3-5** Forestry, woodland & trees: **Table 3-6** Archaeology & Cultural Heritage: **Table 3-7**
Species and Habitats	Ecology & Ornithology: **Tables 3-2 & 3-3** Natural Places: **Tables 3-2 & 3-4**

HwLDP Policy 67	
	Soils: **Tables 3-2 & 3-5** Forestry, woodland & trees: **Tables 3-2 & 3-6**
Landscape and Visual Impact	**Tables 3-2, 3-4 & 3-7**
Amenity at Sensitive Locations	**Table 3-2**
Safety and Amenity of Individuals and Individual Properties	**Table 3-2**
The Water Environment	**Table 3-2**
Safety of Airport, Defence and Emergency Service Operations	**Table 3-2**
The Operational Efficiency of Other Communications	**Table 3-2**
Public Access	**Tables 3-8 & 3-9**
Other Tourism and Recreation Interests	**Tables 3-2, 3-8 & 3-9**
Traffic and Transport	**Table 3-2**

Table 3-11: Assessment of the Proposed Development Against Other HwLDP Policies

Policy Principle	Policy Summary and Assessment
Policy 28: Sustainable Design	Policy 28 sets out the requirement for all development to be designed in the context of sustainable development and climate change. The policy sets out criteria which development proposals are to be assessed against. The position with regard to these is as follows: • The Proposed Development would make the most of the site's excellent wind resource and utilise existing infrastructure wherever possible and is therefore considered to be in accordance with criterion 3 which requires that developments maximise energy efficiency in terms of location, layout and design. • Impacts upon residential amenity have been assessed in relation to NPF 4 Policy 11 and are considered to be acceptable (**Table 3-2** of this Planning Statement refers). The Proposed Development would therefore be in accordance with criterion 7. • The impact of the Proposed Development upon the resources listed in criterion 9 has been assessed in relation to NPF Policy 3 and 11 and is considered to be acceptable (**Table 3-2** and **Table 3-3** of this Planning Statement refer). The Proposed Development would therefore be in accordance with this criterion. This is considered with regard to proposed compensation and enhancement measures as set out for peatland restoration related to NPF Policy 3. • Criterion 10 requires sensitive siting and high-quality design. As set out in the assessment of Policies 4, 7, 11 and 14 of NPF 4, the Proposed Development has been sensitively sited and its design would not result in any significantly detrimental effects overall upon local character, the historic environment or the natural environment.

Policy Principle	Policy Summary and Assessment
	• The Proposed Development would contribute positively to the local and wider economy and is therefore considered to be in accordance with criterion 10. Other criteria listed under Policy 28 are not considered to be relevant. Overall, it is concluded that the Proposed Development is in accordance with this policy in so far as it is relevant.
Policy 51: Trees and Development	Trees and development have been assessed under Policy 6 of NPF4. It is considered that the ecological benefits of woodland removal to facilitate peatland restoration and provide associated biodiversity mitigation and enhancement measures for the site are an important consideration. It is considered that these benefits justify the loss of woodland and thereby the Proposed Development is considered in compliance with Policy 51.
Policy 55: Peat and Soils	Peatland habitats and peat have been addressed in detail with reference to NPF 4 Policy 5 (**Table 3-5**). The Proposed Development is considered to be in accordance with this policy as it would avoid unnecessary disturbance, degradation and erosion of peat and soils, and a Peat Management Plan would be put in place to establish how peat during the construction of the development would be managed to allow the valid re-use of peat and to avoid, or minimise, the generation of waste peat. Furthermore, peat restoration is proposed as part of the OHMP. The Proposed Development is therefore considered to be in accordance with this policy.
Policy 56: Travel	Policy 56 seeks to ensure that development is sustainable in terms of travel and requires that development proposals must consider likely on and off-site transport implications. The Proposed Development is considered to be in accordance with Policy 56 as mitigation measures would be put in place to ensure that it would not result in any significant adverse effects on the transport network, local road users or road safety during construction or operation.
Policy 57: Natural, Built & Cultural Heritage	Impacts of the Proposed Development upon the features of the natural, built and cultural heritage identified have been assessed in detail with reference to Policy 7 of NPF 4 (**Table 3-7**) The Proposed Development is therefore considered to be in accordance with this policy.
Policy 58: Protected Species	Policy 58 is a multi-criterion-based policy which applies to development proposals that may affect protected species. Impacts upon protected species have been addressed in relation to NPF 4 Policy 3 (**Table 3-3**) With the implementation of the proposed mitigation measures which can be secured via planning conditions, no unacceptable impacts upon any protected species are predicted. The Proposed Development is therefore considered to be in accordance with this policy.
Policy 59: Other Important Species	Policy 59 identifies other important species which THC will generally seek to protect. No detrimental effects on any such species are predicted to occur and therefore the Proposed Development is considered to be in accordance with this policy.
Policy 60: Other Important Habitats	Policy 60 identifies other important habitats which THC will generally seek to protect. A programme of peatland restoration is proposed which will provide compensation for the loss of blanket bog and heathland habitat. The area proposed for peatland restoration is considered to be a degraded habitat due to inappropriate tree planting in the past. Restoration of this peatland habitat would present an opportunity to compensate for the predicted loss of habitat as well as

Policy Principle	Policy Summary and Assessment
	provide additional biodiversity enhancement, whilst also sustaining nature networks.
Policy 61: Landscape	Policy 61 seeks to ensure that new development is compatible with landscape characteristics and that relevant Landscape Character Assessments have been taken into account in development design. Overall, it is concluded that the landscape has the capacity to accommodate the Proposed Development successfully. The Proposed Development is therefore considered to be in accordance with this policy.
Policy 66: Surface Water Drainage	The Proposed Development incorporates good practice drainage design during construction and operation, using a sustainable drainage system (SUDS) approach to control the rate, volume and quality of run-off. The Proposed Development is therefore considered to be in accordance with this policy.
Policy 68: "Community" Renewable Energy Developments	Policy 68 provides that where a community wishes to take a share in a larger project, and where it is the only community significantly impacted by the proposal, that this policy is to be a material consideration. This is the case for the Proposed Development, where an element of community shared ownership has been offered and as demonstrated in the EIA Report and this Planning Statement the Proposed Development would not have a significant impact beyond the community it is situated within. Whilst the same tests of acceptability apply for community renewable energy projects as those under Policy 67 for commercial proposals, Policy 68 provides that when this policy is engaged that THC may grant consent for renewable energy development with greater impacts upon the amenity of that community's area as a place in which people reside or work than would normally be the case. In other words, a higher threshold of effect upon that community may be acceptable. Other than some localised landscape and visual impacts which are to be expected for a commercial wind farm development (as now set out in Policy 11 of NPF4), there are no other residual significant effects. It is therefore considered that the Proposed Development draws additional support from this policy.

3.3 Climate Change and Renewable Energy Policy Considerations

138. The UK and Scottish Governments have made multiple international and domestic commitments in respect of reducing emissions of greenhouses gas to combat climate change and commitments to renewable energy generation.

139. The framework of international agreements, obligations, legally binding targets and climate change advisory reports is the foundation upon which national energy policy is based. This sets out the need case for renewable energy which provides strong support for onshore wind in principle. In addition, NPF4 (discussed in **Section 3.2.1** of this Planning Statement) sets out in policy that decision makers must give significant weight to the global climate emergency and nature crises.

3.3.1 Scottish Energy Strategy 2017 (SES)

140. The SES was published in December 2017, in the context of lower greenhouse gas emissions targets set initially under the Climate Change (Scotland) Act 2009. The SES sets out the Scottish Government vision for the future energy system in Scotland for the period through to 2050. The SES identifies that Scotland's long-term climate change targets will require the near complete decarbonisation of our energy system by 2050, with renewable energy meeting a significant share of our needs.

141. The SES set a target for the equivalent of 50% of the energy for Scotland's heat, transport and electricity consumption to be supplied from renewable sources by 2030. This 50% target roughly equates to of 17GW of installed capacity in 2030. In addition to setting energy targets, the SES also sets out six strategic priorities These include:

- *"System security and flexibility – we should have the capacity, the connections, the flexibility and resilience necessary to maintain secure and reliable supplies of energy to all of Scotland's homes and businesses as our energy transition takes place.*
- *Renewable and low carbon solutions – we will continue to champion and explore the potential of Scotland's huge renewable energy resource, and its ability to meet our local and national heat, transport and electricity needs – helping to achieve our ambitious emissions reduction targets."*

142. The SES advises that onshore wind energy development is essential to Scotland's transformation to a fully decarbonised energy system by 2050 and brings opportunities which underpin our vision to grow a low carbon economy and build a fairer society.

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

143. In May 2019 the Scottish Government formally declared a climate emergency. This resulted in the Climate Change (Emissions Reduction Targets) (Scotland) Act 2019, which amends the Climate Change (Scotland) Act 2009 and commits the Scottish Ministers to a new target of net zero emissions of all greenhouse gases by 2045, with interim targets for reductions of at least 56% by 2020, 75% by 2030 and 90% by 2040. These amended greenhouse emissions targets, and the series of annual targets towards them, represent a substantial increase over the targets set in the previous Act.

144. To help ensure delivery of the long-term targets, the framework includes statutory annual targets for every year to net zero. Up to 2020 the annual percentage reduction required is 1%, but this immediately leaps for each year between 2020 to 2030. It increases to 1.9% for each year between 2020 and 2030, a near doubling of the response.

145. Part 4 of the 2009 Act places climate change duties on Scottish public bodies. It states that a *"public body must, in exercising its functions, act: in the way best calculated to contribute to the delivery of*

(Scotland's climate change) targets; in the way best calculated to help deliver any (Scottish adaption programme); and in a way that it considers most sustainable". This means that all public sector organisations, including Scottish Ministers and local authorities, are obliged in exercising their functions to do so in a manner which is consistent with meeting the net zero climate change target.

3.3.3 Onshore Wind Policy Statement (OWPS) 2022

146. The Scottish Government published the OWPS in December 2022.The OWPS 2022 set a new ambition for the deployment of onshore wind in Scotland: a minimum installed capacity of 20GW of onshore wind in Scotland by 2030. This 20GW ambition will help support the rapid decarbonisation of the energy system and the sectors which depend upon it, aligning with a just transition to net zero.

147. Chapter 1 of the OWPS 2022 contains specific acknowledgement of the need to further the speedy deployment of onshore wind. It 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"*. As a result of the policy ambition for a minimum installed capacity of 20GW by 2030. If the policy ambition of a minimum of installed capacity of 20GW of onshore wind in Scotland by 2030 is to be achieved, consents need to be granted to allow deployment as quickly as possible. Paragraph 2.4.2 states that *"Onshore wind will play a crucial role in delivering our legally binding climate change targets."*

148. In paragraph 3.6.1, the OWPS also recognises that meeting the 2030 target will require "*taller and more efficient turbines. This will change the landscape".* This statement echoes that of Policy 11(e)(ii) of NPF4 which sets an expectation for significant landscape and visual effects arising for some forms of renewable energy developments.

149. In paragraph 3.6.2 of OWPS the Scottish Government's position on the construction of new wind farms and their effect on the landscape further is further clarified as "T*he only areas where wind energy is not supported are National Parks and National Scenic Areas. Outside of these areas, the criteria for assessing proposals have been updated, including stronger weight being afforded to the contribution of the development to the climate emergency, as well as community benefits*" in accordance with NPF4.

3.3.4 Draft Energy Strategy and Just Transition Plan 2023

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

151. The Plan outlines several of the government's targets to reach a net zero Scotland, with the main milestones and dates outlined as:

- to substantially increase Scotland's renewable electricity generation capacity from the current level of 13.4 Gigawatts (GW) with an additional 20GW resulting in an overall capacity of at least 33.4GW by 2030;
- aims to have 8-11GW of installed offshore, and an additional 12GW of installed onshore wind capacity by 2030;
- for renewable and low-carbon hydrogen power to provide 5GW (the equivalent of 15% of Scotland's current energy needs) by 2030, increasing to 25GW by 2045; and

- to phase out the necessity for new petrol and diesel cars by 2032, and to reduce total car kilometres by 2030.

152. The plan also outlines general commitments made by the Government to assist with the transition to net zero, which include the following:

- to establish a national public energy agency – 'Heat and Energy Efficiency Scotland';
- to increase the contributions of solar, hydropower and marine energy within Scotland's energy mix;
- to accelerate the decarbonisation of domestic industry, transport and heat in buildings;
- to generate surplus electricity – allowing for the export of electricity and renewable hydrogen to support decarbonisation across Europe.;
- to create energy security – through the development of Scotland's resources and additional energy storage;
- to allow for a just transition by maintaining or increasing employment in Scotland's energy production sector against a decline in North Sea production; and
- to maximise the use of Scottish manufactured components in the energy transition, ensuring high-value technology and innovation.

3.3.5 Progress Towards Targets

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

Table 4-1: Progress Against Renewable Energy Targets

Year	Target	Achieved/Progress
2020	Equivalent of 100% of all electricity used in Scotland to come from renewable sources. [4]	No - equivalent of 98.6% of all electricity used in Scotland came from renewable sources.[4]
2021	Equivalent of 100% of all electricity used in Scotland to come from renewable sources. (continuation of 2020 target as target was not met).	No - equivalent of 85.2% of all electricity used in Scotland came from renewable sources (**Graph 4-1**).
2030	To increase the installed onshore wind capacity in Scotland to 20GW.[5]	Latest figures in September 2022 (most recently available) show that the installed onshore wind capacity in Scotland was 13.6GW. [6]
2030	To generate 50% of Scotland's overall energy consumption from renewable sources.[7]	Final figures for 2020 indicate that the equivalent of 26.7% of total Scottish energy consumption came from renewable sources; the highest level to date. It increased from 24.0% in 2019 (**Graph 4-2**).
2050	To have decarbonised the energy system almost completely.[7]	Future target and difficult to gauge progress against.

[4] Scottish Government (2011) *2020 Renewable Routemap for Renewable Energy in Scotland Update 2011*
[5] Scottish Government *Onshore Wind Policy Statement 2022*
https://www.gov.scot/publications/onshore-wind-policy-statement-2022/documents/
[6] Scottish Government *Energy Statistics for Scotland – Q3 2022*
https://www.gov.scot/publications/energy-statistics-for-scotland-q3-2022/pages/renewable-electricity-capacity/
[7] Scottish Government (2017). *The future of energy in Scotland: Scottish energy strategy* 20 December 2017

Table 4-2: Progress Against Greenhouse Gas Emissions Targets

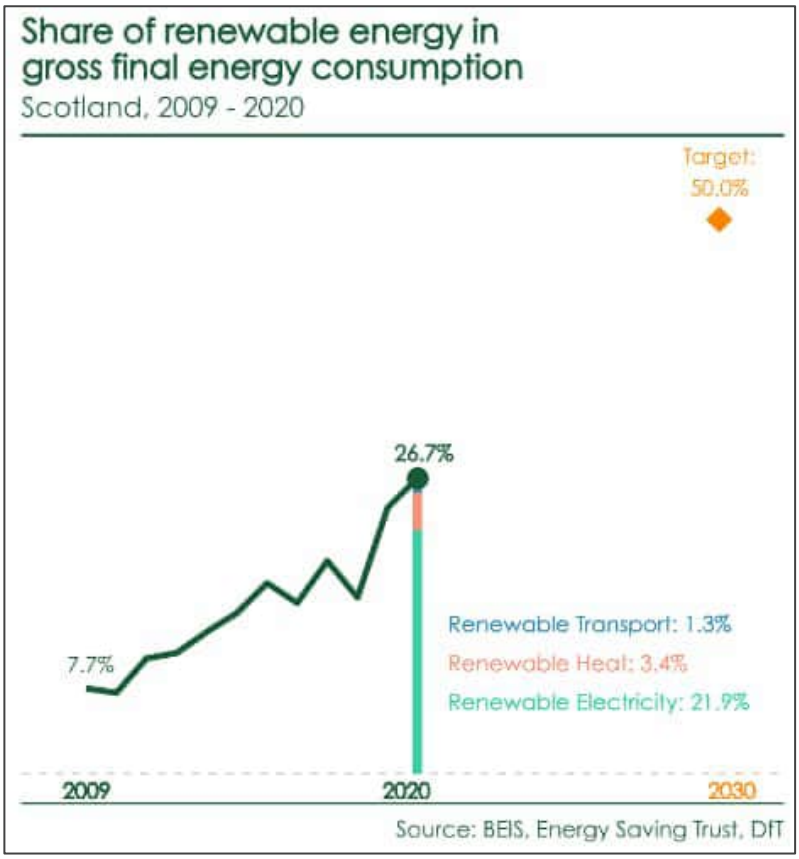
Year	Current Target[8] (% Reduction of Emissions relative to 1990)	Recommended Revised Target[9] (% Reduction of Emissions relative to 1990)	Achieved/Progress
2020	56%	n/a	Achieved – GHG account reduced by 59% between the baseline period and 2020.[9] As detailed in the Scottish Emissions Targets – First Five-Yearly Review (December 2022): *"The fall in emissions in 2020 was largely due to the travel restrictions during the COVID-19 pandemic and it is unlikely the target would have been achieved without the impacts of the pandemic."*.
2021	57.9%	51.1%	Not achieved – GHG account reduced by 49.9%[10] between baseline period and 2021.
2022	59.8%	53.8%	Most recent data available is 2021 figure.
2023	61.7%	56.4%	Most recent data available is 2021 figure.
2024	63.6%	59.1%	Most recent data available is 2021 figure.
2025	65.5%	61.7%	Most recent data available is 2021 figure.
2026	67.4%	64.4%	Most recent data available is 2021 figure.
2027	69.3%	67.0%	Most recent data available is 2021 figure.
2028	71.2%	69.7%	Most recent data available is 2021 figure.
2029	73.1%	72.3%	Most recent data available is 2021 figure.
2030	75%	75%	Most recent data available is 2020 figure.
2040	90%	90%	Most recent data available is 2020 figure.
2045	100%	100%	Most recent data available is 2020 figure.

[8] Scottish Government (2019). Climate Change (Emissions Reduction Targets) (Scotland) Act 2019
[9] Independent Climate Change Committee (2022). Scottish Emissions Targets – First Five-Yearly Review
[10] Scottish Government (2021). Scottish Greenhouse Gas Statistics 2021

Graph 4-1: Renewable Electricity Generation in Scotland

Source: Energy Statistics for Scotland Q3 2022

Graph 4-2: Progress Against Renewable Energy Targets



(Scottish Energy Statistics Hub, 2022)

4.0 Conclusions

154. The broad policy context is strongly supportive of the urgent need for additional renewable energy generation capacity. The drivers behind this support can be summarised as follows:

- the need to address climate change and avoid / mitigate against the worst projected effects;
- the growing demand for electricity and the increased need for renewable energy generation that will be required to meet this need;
- the need for Scotland (and the UK) to reduce its dependency on imported oil and gas and to source more of its energy domestically.

155. As mentioned in the preceding sections and as discussed further in **Chapter 4** (Volume 2) and **Technical Appendix 4.1** (Volume 4a) of the EIA Report, the policy context (including renewable energy policy) is highly supportive of renewable energy development.

156. The highly supportive policy and planning framework has resulted in ambitious renewable energy and climate change targets, however it is clear, as set out in **Section 3.4.5** of this Planning Statement, that Scotland are not on course to meet these targets.

157. Overall, given the urgency of the renewable energy and climate change targets set by the Scottish Government (and UK Government) and the associated vital role that renewable energy developments such as the Proposed Development can play in meeting these targets, should be afforded substantial weight in the planning balance during determination of this application.

158. With regard to planning policy, NPF4 represents a fundamental shift in response to climate change. This has significantly strengthened the planning policy support for renewable energy developments by virtue of a weight of significance that must now be applied to the climate and nature crises when considering development proposals.

159. Policies 1 and 11 of NPF4 provide a supportive and unambiguous basis for decision makers assessing this planning application. This means that significant weight must be attached to the contribution of the Proposed Development to meeting renewable energy generation and greenhouse gas emissions reductions targets.

160. Policy 11 of NPF4 clearly sets out support for onshore wind development and the Proposed Development is considered to accord with this Policy Outcome which is the "*expansion of renewable, low-carbon and zero emissions technologies.*" It is also important to note that there is a recognition in this policy of the potential for significant landscape and visual effects arising from certain types of renewable energy development. It is accepted that a development of a commercial wind farm of this nature will inevitably give rise to landscape and visual effects. The Proposed Development, which for the most part would be read in conjunction with other wind farms, would give rise to localised landscape and visual effects.

161. An OHMP has been prepared and as previously discussed, it sets out a number of measures for restoration of peatland habitat. These measures on what are considered to be a degraded habitat would enhance priority habitats on the site (peatland and heathland) and would provide further beneficial effects by improving habitat connectivity with the habitat management areas linked to the consented Ben Sca Wind Farm and its extension. It is considered that the peatland restoration proposed is sufficient to both compensate for the loss of peatland habitat that would occur as a result of the Proposed Development as well as providing for a sufficient level of additional biodiversity enhancement

to satisfy the requirements of NPF4 Policy 3. Overall, it is therefore considered that the Proposed Development would bring about biodiversity enhancement through the HMP that would leave the environment in a demonstrably better state than without intervention in accordance with NPF4 Policy 3.

162. It is considered that the Proposed Development can draw strong policy support from NPF4 for the role it can play in tackling the twin crises of climate emergency and nature crises.

163. The identified significant environmental effects arising from the Proposed Development relate to landscape and visual effects. Given all other material factors related to the application and the localised nature of effects, particularly with regard to Policy 11(e)(ii) of NPF4, these potential adverse effects can be considered acceptable.

164. The Proposed Development accords with the provisions of the development plan, made up of NPF4 and the LDP. There are no material considerations which would outweigh the Proposed Development's compliance with the development plan and, in fact, there are material considerations that provide significant weight in favour of the Proposed Development. Planning permission should be granted for the Proposed Development.

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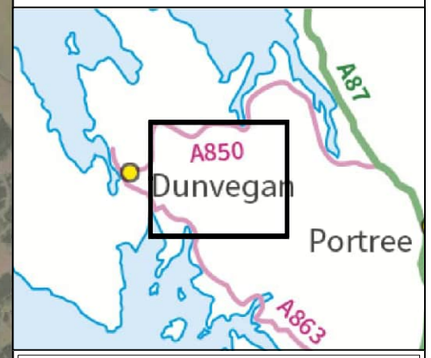
LEGEND

Application Site Boundary



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Kilometres

BALMEANACH WIND FARM LIMITED

SLR

4/5 LOCHSIDE VIEW
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EH12 9DH

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PLANNING STATEMENT

AERIAL PHOTOGRAPH

FIGURE 1

Scale: 1:30,000 @ A3

Date: JULY 2023

11223.00001.0270.0 Figure 1 Aerial Photograph

120000 130000 140000

860000 850000 840000

LEGEND

Application Site Boundary

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Kilometres

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PLANNING STATEMENT

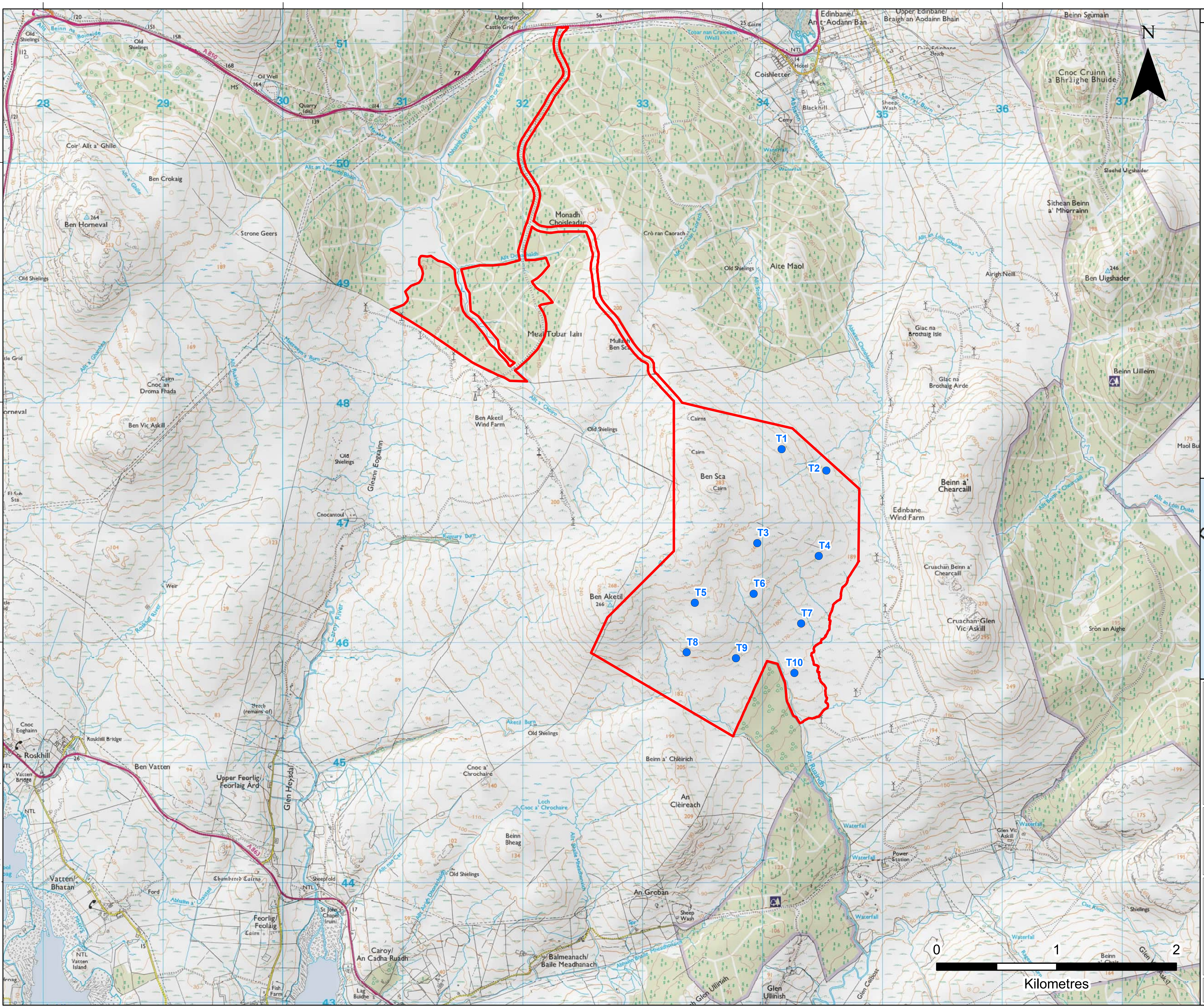
SITE LOCATION

FIGURE 2

Scale 1:100,000 @ A3

Date JULY 2023

11223.00001.0271.0 Figure 2 Site Location



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T10
Edinbane/
Ant-Aodann Ban
Upper Edinbane/
Braigh an Aodainn Bhain
Beinn Sgumain
Coishletter
Blackhill
A850
Ben Crokaig
Ben Horneval
Strone Geers
Monadh
Choisleadar
Aite Maol
Meall Tobar Iain
Ben Aketil
Wind Farm
Ben Sca
Ben Aketil
Beinn a' Chearcaill
Edinbane
Wind Farm
Cruachan Beinn a' Chearcaill
Cruachan-Glen
Vic Askill
Sithean Beinn
a' Mhorrainn
Ben Uigshader
Beinn Uilleim
Cnoc Cruinn
a' Bhràighe Bhuide
Ben Vic Askill
Cnoc an
Droma Fhada
Roskhill
Ben Vatten
Upper Feorlig/
Feorlaig Àrd
Glen Heysdal
Cnoc a'
Chrochaire
Beinn a' Chlèirich
An
Clèireach
Beinn
Bheag
An Groban
Caroy/
An Cadha Ruadh
Balmeanach/
Baile Meadhanach
Vatten/
Bhatan
Feorlig/
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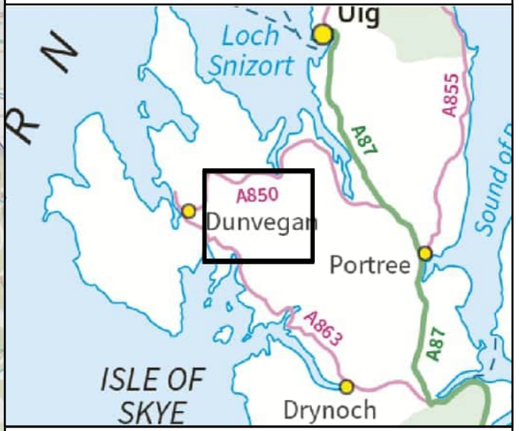
LEGEND

- Application Site Boundary
- Proposed Turbine Location



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PLANNING STATEMENT

APPLICATION BOUNDARY

FIGURE 3

Scale	Date
1:30,000 @ A3	JULY 2023

11223.00001.0272.0 Figure 3 Application Boundary

LEGEND

▭	Application Site Boundary
●	Proposed Turbine Location
★	Proposed Permanent Met Mast
🟨	Proposed Crane Hardstanding
🟧	Proposed Construction Compound
🟥	Proposed Substation
🟫	Proposed Turning Head
▨	Potential Borrow Pit
▨	Proposed Habitat Management Area
—	Existing Access Track
- - -	Consented Access Track

Proposed Track Alignment

—	Proposed
—	Proposed Option A
—	Proposed Option A1
—	Proposed Option A2
—	Proposed Option B

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PLANNING STATEMENT

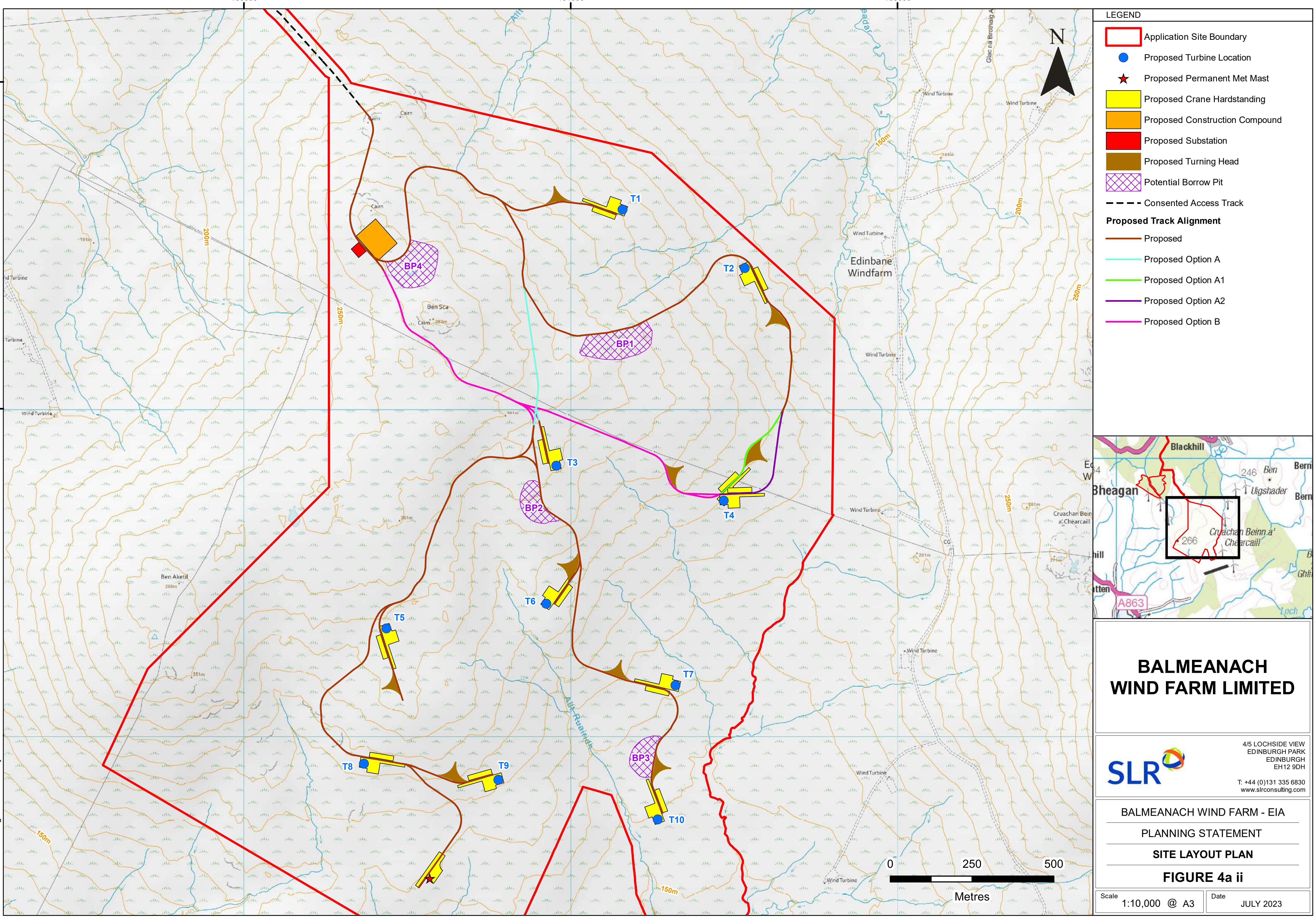
SITE LAYOUT PLAN

FIGURE 4a i

Scale 1:30,000 @ A3

Date JULY 2023

11223.00001.0274.0 Figure 4a Site Layout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BP1
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BP3
BP4
Edinbane
Windfarm
Ben Sca
Ben Aketil
LEGEND
Application Site Boundary
Proposed Turbine Location
Proposed Permanent Met Mast
Proposed Crane Hardstanding
Proposed Construction Compound
Proposed Substation
Proposed Turning Head
Potential Borrow Pit
Consented Access Track
Proposed Track Alignment
Proposed
Proposed Option A
Proposed Option A1
Proposed Option A2
Proposed Option B
N
0
250
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Metres
A863

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PLANNING STATEMENT

SITE LAYOUT PLAN

FIGURE 4a ii

Scale 1:10,000 @ A3

Date JULY 2023

11223.00001.0274.0 Figure 4a Site Layout

128000 129000 130000 131000 132000 133000 134000 135000 136000 137000

851000 850000 849000 848000 847000 846000 845000

N

T1 T2 T3 T4 T5 T6 T7 T8 T9 T10

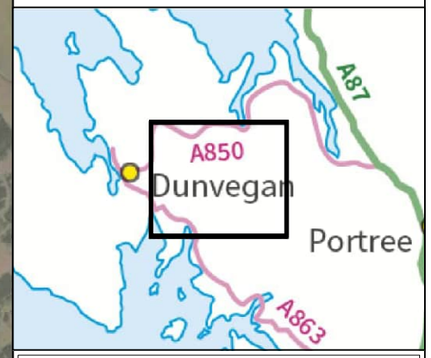
0 1 2
Kilometres

LEGEND

- Application Site Boundary
- Proposed Turbine Location
- Proposed Permanent Met Mast
- Proposed Crane Hardstanding
- Proposed Construction Compound
- Proposed Substation
- Proposed Turning Head
- Potential Borrow Pit
- Proposed Habitat Management Area
- Existing Access Track
- Consented Access Track

Proposed Track Alignment

- Proposed
- Proposed Option A
- Proposed Option A1
- Proposed Option A2
- Proposed Option B



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BALMEANACH WIND FARM - EIA

PLANNING STATEMENT

SITE LAYOUT PLAN

FIGURE 4b i

Scale	Date
1:30,000 @ A3	JULY 2023

11223.00001.0275.0 Figure 4b Site Layout

133000
134000
135000
848000
847000

N

T1
T2
T3
T4
T5
T6
T7
T8
T9
T10
BP1
BP2
BP3
BP4

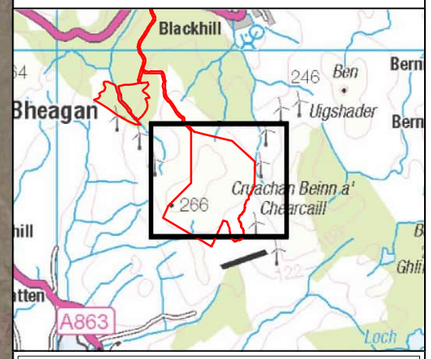
0
250
500
Metres

LEGEND

- Application Site Boundary
- Proposed Turbine Location
- Proposed Permanent Met Mast
- Proposed Crane Hardstanding
- Proposed Construction Compound
- Proposed Substation
- Proposed Turning Head
- Potential Borrow Pit
- Consented Access Track

Proposed Track Alignment

- Proposed
- Proposed Option A
- Proposed Option A1
- Proposed Option A2
- Proposed Option B



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PLANNING STATEMENT

SITE LAYOUT PLAN

FIGURE 4b ii

Scale 1:10,000 @ A3

Date JULY 2023

11223.00001.0275.0 Figure 4b Site Layout

120000 130000 140000

850000

10km

5km

Ben Sca and Extension

Ben Aketil and Extension

Ben Aketil Repowering

Edinbane

Glen Ullinish

Beinn Mheadhonach

Sumardale Croft

Meadale Farm

0 2 4

Kilometres

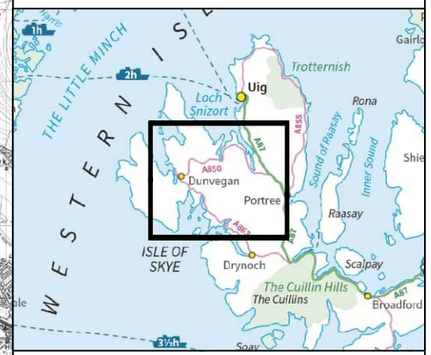
N

LEGEND

- Application Site Boundary
- Proposed Turbine Location
- Proposed Turbine Location 5 and 10 km Buffers

Status of Cumulative Developments

- Consented
- Operational



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BALMEANACH WIND FARM - EIA

PLANNING STATEMENT

CUMULATIVE DEVELOPMENTS WITHIN 10KM

FIGURE 5

Scale: 1:85,000 @ A3

Date: JULY 2023

11223.00001.0361.0 Figure 5 Cumulative Wind Farms

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