Environmental Impact Assessment Report

Swarclett Wind Farm

Chapter 4: Planning and Energy Policy

Swarclett Wind Energy Limited

June 2024

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Glossary of Terms

Term	Definition
The Applicant	Swarclett Wind Limited
Environmental Advisors and Planning Consultants	Atmos Consulting Limited
Environmental Impact Assessment	Environmental Impact Assessment (EIA) is a means of carrying out, in a systematic way, an assessment of the likely significant environmental effects from a development.
Environmental Impact Assessment Regulations	The Town and Country Planning (Environmental Impact Assessment) (Scotland) Regulations 2017 (EIA Regulations)
Environmental Impact Assessment Report	A document reporting the findings of the EIA and produced in accordance with the EIA Regulations
The Proposed Development	The Swarclett Wind Farm
The Proposed Development Footprint	The area within which the Proposed Development will be located
The Proposed Development Site	The full application boundary, i.e. the red line boundary (Figure 1-1 Site Location).
The Planning Act	The Town and Country Planning (Scotland) Act 1997 (as amended)

List of Abbreviations

Abbreviation	Description
CCC	Climate Change Committee
CCRA	Climate Change Risk Assessment
COP	Conference of the Parties
CO_2	Carbon dioxide
EIA	Environmental Impact Assessment
EIAR	Environmental Impact Assessment Report
ESJTP	Energy Strategy and Just Transition Plan
GHG	Greenhouse Gas
HWLDP	Highland Wide Local Development Plan
LDP	Local Development Plan
NDC	Nationally Determined Contribution
NPF4	National Planning Framework 4
PAN	Planning Advice Note
OnWPS	Onshore Wind Policy Statement
SES	Scottish Energy Strategy

4 Planning and Energy Policy

4.1 Introduction

This Chapter of the EIA Report identifies the main Development Plan policies and other material considerations applicable to this planning application for the Proposed Development. Detail on policy and other material considerations relating specifically to the topics within the EIA are is included in the relevant topic chapters (Chapters 5-14) and not included in this Chapter.

A detailed assessment of the Proposed Development against planning policy is contained within a separate Planning Statement, which accompanies the planning application.

4.2 Statutory Development Plan

The Statutory Development Plan consists of the National Planning Policy Framework 4 (NPF4, Scottish Government 2023a) Highland-wide Local Development Plan (HwLDP, THC, 2012) and the Caithness and Sutherland Local Development Plan (CasPlan, THC 2018). When determining planning applications, The Highland Council (THC) is legally required to have regard to the Statutory Development Plan.

The Chief Planner's Letter on transitional arrangements for NPF4 published on 8 February 2023 provides advice on *"NPF4 becoming part of the statutory 'development plan' alongside local development plans (LDPs)"* (Scottish Government, 2023b).

The nature of the transitional period between the adoption of NPF4 and its translation to local development plans within each local authority in Scotland is acknowledged, with the approach to conflicts which are expected to arise between existing LDP planning policy and NPF4 clarified as;

> *"It is recognised that it may take some time for planning authorities and stakeholders to get to grips with the NPF4 policies, and in particular the interface with individual LDP policies. … in the event of any incompatibility between a provision of NPF and a provision of an LDP, whichever of them is the later in date is to prevail. Provisions that are contradictory or in conflict would be likely to be considered incompatible."*

4.3 National Planning Framework 4 (NPF4)

NPF4 was adopted by the Scottish Government (2023a) on 13th February 2023. NPF4 is the national spatial strategy for Scotland and also incorporates Scottish Planning Policy. It sets out the principles for spatial development, defines national developments and regional priorities and sets out national planning policy.

NPF4 sets out significant and increased emphasis on the climate change and net zero agenda to bring together cross-cutting priorities and achieve sustainable development through three key themes: sustainable places, liveable places and productive places.

Part 1 of NPF4, the National Spatial Strategy for Scotland 2045 will be supported by the planning and delivery of sustainable places, "*where we reduce emissions, restore and better connect biodiversity*". *It is set out that:*

> *"Scotland's future places will be net zero, nature-positive places that are designed to reduce emissions and adapt to the impacts of climate change, whilst protecting, recovering and restoring our environment."*

In terms of renewable energy generation, NPF4 acknowledges that:

> *"A large and rapid increase in electricity generation from renewable sources will be essential for Scotland to meet its net zero emissions targets"*: noting that:
>
> *"Additional electricity generation from renewables and electricity transmission capacity of scale is fundamental to achieving a net zero economy and supports improved network resilience in rural and island areas".*

National Planning Policy 1 in Part 2 of NPF4: 'Tackling the climate and nature crises', states the approach to development proposals:

> *"When considering all development proposals significant weight will be given to the global climate and nature crises".*

Policy 2 'Climate mitigation and adaptation' seeks to:

> *"… encourage, promote and facilitate development that minimises emissions and adapts to the current and future impacts of climate change."*

This indicates that climate change should be a guiding principle for decision making and that substantial policy support is given to any proposed development which contributes towards climate change targets.

The intent of Policy 11: Energy is stated as:

> *"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)."*

Paragraph a) of Policy 11 states that:

> *"Development proposals for all forms of renewable, low-carbon and zero emissions technologies will be supported. These include: wind farms including repowering, extending, expanding and extending the life of existing wind farms".*

Paragraph e) of Policy 11 states that:

> *"In addition, project design and mitigation will demonstrate how the following impacts are addressed"*; including
>
> *"…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"*

It is clear within NPF4 that the generation of renewable energy is recognised as being of national importance as:

"significant weight will be placed on the contribution of the proposal to renewable energy generation targets and on greenhouse gas emissions reduction targets."

NPF4 recognises that renewable energy generation through onshore wind farm development is a key part of the way in which the emissions reduction statutory outcome and the attainment of the legally binding net zero will be fulfilled. This can be afforded significant weight.

4.4 Planning Advice Notes

The Scottish Government has published a number of Planning Advice Notes (PANs) providing advice on good practice on a variety of subjects. Since the adoption of NPF4, references in planning advice to 'spatial framework', 'spatial planning' and 'areas of search', in relation to onshore turbines have been superseded and therefore not relevant.

The following are considered of relevance to this application as they have informed the EIAR;

- Circular 1/2017: Environmental Impact Assessment Regulations;
- PAN 2/2011: Planning and Archaeology;
- PAN 3/2010: Community Engagement;
- PAN 1/2011: Planning and Noise;
- PAN 51: Planning, Environmental Protection and Regulation;
- PAN 60: Natural Heritage;
- PAN 62: Radio Telecommunications;
- PAN 68: Design Statements;
- Onshore wind turbines: planning advice;
- PAN 73: Rural Diversification;
- PAN 75: Planning for Transport
- PAN 79: Water and Drainage;
- Flood risk: planning advice;
- Wind farm developments on peat land: planning advice; and
- Planning and waste management advice.

4.5 Material Considerations

4.5.1 Onshore Wind Policy Statement

The Onshore Wind Policy Statement (OnWPS) 2022 (Scottish Government, 2022) was published on 21 December 2022 and outlines the Scottish Government's ambitions for the Onshore Wind Sector, highlighting how these can be delivered. The urgency and relevance of the need to meet Net Zero targets has been stressed through the following statement: "*We must now go further and faster than before*".

The Statement notes Scotland's current installed onshore capacity is 8.7GW, as of June 2022, and Scotland's aim is to maintain a supportive policy and regulatory framework. It

is stated that in achieving this will enable an increase in renewable energy deployment and meet the overall ambition of 20 GW of installed onshore wind capacity in Scotland by 2030.

The OnWPS reiterates the Scottish Government's commitment to tackling the climate and nature crises in tandem. It notes that nature-based solutions, like peatland restoration, can target investment in the right types of natural capital in the right places. In good condition peatlands provide multiple benefits, including capturing and storing carbon but when degraded peat can become a net emitter of greenhouse gases.

Reversing degradation through peatland restoration is therefore central to mitigating and adapting to the linked climate and nature crises and the OnWPS identifies the opportunity for wind energy development to contribute significantly to improving biodiversity.

It cites evidence that significant positive effects for biodiversity from wind farm developments can be achieved and provides examples of best practice in biodiversity enhancement on wind energy development. Through this there is an expectation that new onshore wind development will demonstrate commitment to protecting and restoring habitats.

The criteria through which proposals will be evaluated has been updated to focus a stronger emphasis on the role which wind energy developments can play both in the response to the joint climate and nature crises as well as the resulting socioeconomic and community benefits.

4.5.2 Draft Energy Strategy and Just Transition Plan (2023)

The Draft Energy Strategy and Just Transition Plan was published on 10 January 2023 (Scottish Government, 2023c). The Scottish Government's key ambitions for Scotland's energy future are detailed, as well as; "*proposing a vision for a just energy transition*" which provides socioeconomic benefits whilst protecting the environment and providing energy security.

Expanding the energy generation sector is identified as a key ambition with offshore wind, onshore wind, solar and hydrogen listed as just some of the sources which should have the potential to make up the energy mix.

The draft Just Transition Plan emphasises the Scottish Government's focus on; "*…collaboration between people from all parts of Scotland and all walks of life…*", ensuring that workers, businesses, communities and consumers have all played a key part in forming the draft through early codesign.

4.5.3 Progress Towards Energy Targets

The Scottish Government's Energy Statistics for Scotland Q1 2023 (Scottish Government, 2023c) published in June 2023 shows a decrease in renewable electricity generation of 9% from the same period in 2022 and an increase in renewable electricity capacity of 2.2% from 13.9GW in December 2022 to 14.2GW in March 2023.

The Scottish Government previously had a target that by 2020 the equivalent of 100% of Scotland's electricity demand would be generated from renewable sources. Although the target year has passed and the target itself missed, the Scottish Government are continuing to monitor progress against the target of 100% of electricity from renewable sources.

The latest Scottish Energy Statistics (Scottish Government 2023d) indicated that in the 12 months leading up to March 2023, 83.6% of gross electricity consumption was from renewable sources, down from 85.8% in the same period ending March 2022.

This decrease of 2.2% compared to 2022 has been attributed by the Scottish Government to milder weather in 2022 and illustrates that Scotland is not on track to meet its renewable energy targets.

4.6 Local Planning Policy

Local Planning Policy applicable to the Proposed Development comprises:

- The Highland-wide Local Development Plan (HwLDP) (as continued in force, April 2012);
- The Caithness and Sutherland Local Development Plan (CaSPlan) (August 2018); and
- Relevant supplementary guidance, including the Onshore Wind Energy Supplementary Guidance (2016), and its addendum, 'Part 2b' (THC, 2017).

4.6.1 The Highland-wide Local Development Plan (HwLDP)

The HwLDP is currently being reviewed under the revised framework for Local Development Plans stated in NPF4, with formal activities scheduled to commence in 2023.

The HwLDP was adopted in April 2012 and sets out the positive stance of THC towards renewable energy development. The HwDLP is the vision statement and spatial strategy for the area however, since the adoption of NPF4 (Section 4.2.1 of this chapter), the policies and spatial strategy within NPF4 take precedence.

It is stated within the Planning Act (section 24(3)) that;

> *"In the event of any incompatibility between a provision of the National Planning Framework and a provision of a local development plan, whichever of them is the later in date is to prevail".*

In the case of any conflict, therefore, NPF4 will take precedence over the policies detailed within HwLDP.

Overall, the HwLDP is generally consistent with the overarching intention of NPF4. Significant adverse effects to sensitive receptors should be avoided and adequate mitigation provide, and where significant adverse effects to receptors remain, developments will only be permitted where there are reasons of overriding public interest, such as social or economic.

NPF4, however, does take this further, providing further direction that the contribution to climate change targets may be an overriding determining factor.

The following key policies have informed the design of the Proposed Development on the assumption that these will be the policies against which the proposals will be reviewed where there is consistency with NPF4:

- **Policy 67 Renewable Energy Development**: considers the contribution of the development towards meeting renewable energy targets and the potential impact of the development in terms of social, economic and environmental impact. It also assesses the proposal against other polices of the development plan and relevant

guidance. This is consistent with NPF4 Policy 1, which specifically states that significant weight will be given to the global climate and nature crises with development proposals encouraged to mitigate, minimise emissions and adapt to climate change;

- **Policy 57 Natural, Built and Cultural Heritage**: proposals will be assessed taking into account the level of importance and type of heritage features (international, national or local/regional), the form and scale of the proposed development and any impact on the feature and its setting.
  For features of national importance, the HWLDP will allow developments that can be shown not to compromise the natural environment, amenity and heritage resource. Secondly, where there may be any significant adverse effects, these must be clearly outweighed by social or economic benefits of national importance.
  NPF4 Policy 7 partially echoes this approach by stipulating that developments with the potential to significantly affect historical assets or locations must include an evaluation grounded in an appreciation of the cultural importance of these historical assets or locations. In terms of nationally important monuments, this policy provides that development proposals will only be supported where direct impacts and significant adverse impacts on the integrity of the setting are avoided or where exceptional circumstances have been demonstrated to justify the impact and impacts have been minimised;
- **Policy 55 Peat and Soils**: proposals should demonstrate how they have avoided unnecessary disturbance, degradation or erosion of peat and soils and provide a peat management plan if necessary to demonstrate how impacts have been minimised and mitigated.
  Similarly, NPF4 Policy 5 sets out that support will be given where disturbance to soils is minimised. However, if located on peatland and/or carbon rich soils, support will be given if the development contributes to reduction targets for GHG emissions by the generation of energy from renewable sources following a site-specific assessment and peat management plan (PMP);

  Policy 61 Landscape: takes account of particular landscape characteristics. New developments should be designed to reflect the landscape characteristics and special qualities identified in the Landscape Character Assessment of the area in which they are proposed. This includes consideration of appropriate scale, form, pattern and construction materials, as well as the potential cumulative effect of developments where this may be an issue. Measures of enhancement are encouraged.
  This is consistent with NPF4 Policy 4, which details that development proposals that affect a landscape will only be supported where development will not have significant adverse effects on the integrity of the area or the qualities for which it has been identified. The policy also outlines that in the circumstances there are any significant adverse effects on the integrity of the area, these are clearly outweighed by social, environmental or economic benefits of at least local importance. This allowance for renewable development is also reflected within NPF4 Policy 11 which provides that effects on landscape and visual amenity are to be expected for some forms of renewable energy and that in the event that impacts are localised and/or appropriate design mitigation has been applied, they will generally be considered to be acceptable.

Other HwLDP policies that have been considered include:

- **Policy 28 Sustainable Design**: proposed developments will be assessed in relation to the promotion of social, economic and environmental wellbeing. This is consistent with NPF4 Policy 25, which outlines support for development proposals which contribute to local or regional community wealth building strategies and are consistent with local economic priorities. Additionally, this is consistent with NPF4 Policy 2 which supports development which minimises emissions and adapts to the current and future impacts of climate change;
- **Policy 30 Physical Constraints**: sets out areas of constraint which developers must consider when siting their proposals as set out in Physical Constraints: Supplementary Guidance (THC, 2012) NPF4 Policy 11 also recognises this, detailing that development proposals for all forms of renewable, low-carbon and zero emissions technologies will be supported, however, project design and mitigation must demonstrate how the impacts of physical constraints are addressed;
- **Policy 36 Development in the Wider Countryside**: sets out how proposed developments will be assessed in relation to areas out with settlement development. It provides that Renewable energy development proposals will be assessed against the non statutory Highland Renewable Energy Strategy, and where appropriate, Onshore Wind Energy: Supplementary Guidance.(HwLDP,2012). This Guidance recognises the need to cleaner forms of energy and for the Highland area to be part of a wider regional sustainable development strategy. This is in line with NPF4 Policy 1, which in any assessment of proposed development, gives significant weight to the global climate emergency;
- **Policy 51 Trees and Development**: sets out that proposed developments will be supported where they promote significant protection to existing hedges, trees and woodlands on and around development sites. This policy is consistent with NPF4 Policy 6, which also details that proposals that enhance, expand and improve woodland and tree cover will be supported. Further, that in circumstances where woodland is removed, compensatory planting will most likely be expected to be delivered where appropriate;
- **Policy 52 Principle of Development in Woodland**: sets out THC's favour for protecting woodland resources and details how proposals should be assessed against conformity with the Scottish Government's Policy on Control of Woodland Removal (Forestry Commission Scotland, 2009) and The Highland Forest and Woodland Strategy (THC, 2018) which reference removal of woodland in the public interest. This policy is in line with NPF4 Policy 6 which generally does not support developments which result in loss of woodland unless they will achieve significant and clearly defined additional public benefits in accordance with relevant Scottish Government policy on woodland removal;
- **Policy 58 Protected Species**: whereby there is a possibility that protected species may be present on site or affected by a proposal survey works and assessment are required and if necessary a mitigation plan to avoid or minimise any impacts on the species, before determining the application. This is in line with NPF4 Policy 4 which provides that 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;

- **Policy 59 Other Important Species**: sets out other legislation and nature conservation site designations which could be affected by a proposal. This is in line with NPF4 Policy 4 which outlines that 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;
- **Policy 60 Other Important Habitats and Article 10 Features**: sets out other Important Habitats and Article 10 Features to ensure their protection by any development proposals.NPF4 Policy 3 is more rigorous within this area, as it provides that proposals for national or major development, or those necessitating an Environmental Impact Assessment, will only receive support if they show a clear improvement in biodiversity and nature networks compared to the state without intervention, including future management;
- **Policy 63 Water Environment**: proposals should not compromise the Water Framework Directive (2000/60/EC) in line with the River Basin Management Plan for the Scotland River Basin District (SEPA, 2021) and associated Area Management Plans. This is consistent with NPF4, however with the qualification that significant weight will be put on the contribution of a development to renewable energy generation;
- **Policy 64 Flood Risk**: development proposals should avoid areas susceptible to flood and promote sustainable flood management. NPF4 Policy 22 states that development proposals at risk of flooding will be supported where it can be demonstrated that all flood risks are understood, and future adaptations can be made to accommodate climate change related effects;
- **Policy 66 Surface Water Drainage**: proposals must be drained by Sustainable Drainage Systems in accordance with The SuDs Manual (CIRCA C697), the Sewers for Scotland Manual 2nd Edition and Planning Advice note 69: Planning and Building Standards Advice on Flooding. NPF4 Policy 22 replicates this policy in providing development proposals will manage all rain and surface water through sustainable urban drainage systems (SUDS);
- **Policy 72 Pollution**: proposals that may result in significant pollution such as noise, air, water, and light will only be approved where a detailed assessment report is provided to show how pollution can be appropriately avoided and if necessary mitigated. Major Developments and developments that are subject of Environmental Impact Assessment will be expected to follow a robust project environmental management process. This is in line with NPF4 Policy 23 which protects health and wellbeing, including by ensuring that air and noise pollution are taken into account, and by planning and managing development to take hazards into account. NPF4 Policy 11 is also relevant here as support for all development proposals for all forms of renewables technologies is provided, where project design and mitigation demonstrate how impacts on the water environment are minimised.

4.6.2 The Caithness and Sutherland Local Development Plan (CaSPlan)

The Caithness and Sutherland LDP (CaSPlan), adopted in 2018, seeks to provide policies and proposals to for delivering outcomes related to economic growth, environment and heritage, and connectivity and transport (HwLDP, 2018).

It focuses on the above areas while also encouraging the area's transition to a low carbon economy. CaSPlan highlights the Castletown Growth area which the Proposed Development is located approximately 5km to the south of Castletown. The long- term vision for the entire area is to create:

> *"A network of thriving, inclusive communities where people desire to reside, offering convenient access to vital services, training, employment, and serving as the main hubs for inward investment".*

4.6.3 Onshore Wind Energy Supplementary Guidance, November 2016 (with addendum, December 2017)

The Onshore Wind Energy Supplementary Guidance (THC, 2016) and its addendum, 'Part 2b' (THC, 2017) has been adopted as part of the LDP for the Highlands. This guidance was developed to guide the Development Management process for renewable energy applications and provides additional detail and guidance to relevant policies within HwLDP.

In general, the guidance notes that THC is supportive of renewable energy development subject to careful balancing with their wider strategic environmental and economic objectives, including sustainable growth in Highland, and their contribution to renewable energy targets and climate change.

The guidance also makes reference to additional strategic considerations of the landscape capacity of the Highlands and states that any remaining capacity should be focussed around existing clusters. There are specific pressure areas for wind energy development in the Highlands that are addressed in section 5 "Highland Strategic Capacity" .

In accordance with THC's Scoping Opinion (Reference 22/00790/SCOP) particular attention has been made to the provisions of this guidance including the provisions in relation to landscape sensitivity. This is discussed in greater detailed in Volume 2 Chapter 5: Landscape and Visual of this EIAR.

The guidance also sets out the spatial framework as required by Scottish Planning Policy (SPP) as published in 2014 (Scottish Government, 2014). The SPP has now been superseded with the adoption of NPF4, accordingly the spatial approach set out within this Supplementary Guidance no longer applies.

The Supplementary Guidance is therefore considered to provide an indication of the approach to wind energy development within the Highland Council area as opposed to a policy on the spatial approach to wind energy development.

Consistencies with NPF4 within the guidance such as the role of community benefits, and the positive effect onshore wind proposals can have in the region are also recognised, with further guidance available in the Scottish Government: Good Practice Principles Community Benefits Onshore Renewable Energy Developments (Scottish Government, 2019a).

4.7 Climate Change and Energy Policy

4.7.1 Introduction

Climate change has been described as the greatest environmental challenge facing the world today, with the declaration of the global climate emergency in April 2019 and continued publicity around increasing devastating global climate events linked to climate change to date.

The burning of fossil fuels to produce electricity is a major contributor to climate change through the release of atmospheric carbon dioxide (CO_2) and other harmful gases known collectively as greenhouse gases. As part of the response to climate change, the UK Government has entered into binding international agreements and the Scottish Government has made national commitments to reducing greenhouse gas emissions.

Furthermore, there is a clear national focus, following the COVID-19 crisis, to ensure a 'green recovery' for Scotland.

The generation of electricity from renewable energy sources is one of the principal ways in which the Scottish Government targets to reduce greenhouse gas emissions are to be met within the current policy framework.

The following sections set out key UK and Scottish policies and commitments that are central to the requirement for the Proposed Development.

4.7.2 The Climate Emergency

Both the UK and Scottish Government have declared a Climate Emergency (UK Government, 2019; Scottish Government, 2019c). While there is no formal obligation to act associated with this status it does emphasise a public and political desire to increase the effort to combat climate change and may result in climate change targets being brought forward.

THC also declared a climate emergency on 9 May 2019, recognising the serious and accelerating changes to the world caused by climate change.

The declaration from THC committed the Highland Council area to achieving the target of being carbon-neutral by 2025.

4.7.3 International Climate Change Agreements

COP26 – The Glasgow Climate Pact

The COP26 climate summit held in Glasgow began on 31st October 2021. World leaders and delegates from almost 200 countries were in attendance, alongside tens of thousands of negotiators, government representatives, businesses and members of the public for 13 days of discussions and negotiations.

On the final day of the conference (13 November 2021) the world leaders agreed to the Glasgow Climate Pact (UNFCCC, 2021), a global agreement with the aim of accelerating action on climate change to 2030 and limiting the rise of global temperature to 1.5 degrees, in line with the Paris Agreement (UNFCCC, 2015).

The Glasgow Climate Pact calls on countries to revisit and strengthen their 2030 targets by the end of 2022 to align them with the Paris Agreement's temperature goals.

Counties also agreed to return in 2022 with a new UN climate programme on mitigation ambition and that they finalised the Paris "Rulebook".

Notably the Pact states that:

> *"The Glasgow Climate Pact only keeps 1.5C in sight if countries take concerted and immediate action to deliver on their commitments. This means phasing down coal power, halting and reversing deforestation, speeding up the switch to electric vehicles and reducing methane emissions."*

COP27 – The Sharm el-Sheikh Implementation Plan

The COP27 climate summit took place in Sharm el-Sheikh, Egypt from 6th to 18th November 2022. The aim of COP27 was to reiterate the global commitment to tackling the challenges of climate change, particularly in the face of the current energy crisis, as highlighted in the Presidency Vision (UNFCCC, 2022a) target to;

> *"Avoid backsliding on commitments and pledges despite the multiple challenges and crises in particular the energy crisis. We all must show leadership, where pledges and commitments are confirmed…"*

During the summit the parties agreed to the "Sharm el-Sheikh Implementation Plan" which emphasises the *"common but differentiated responsibilities and respective capabilities"* of the nations (UNFCCC, 2022b). Article 3 of Decision-/CP.27 of UNFCCC (2022b) refers to the solution which low-emission, renewable energy presents to climate change and to the energy crisis. The urgent need to rapidly produce sustainable reductions in greenhouse gas emissions and importance of "*enhancing a clean energy mix*" are stressed in Article 3.8 and 3.10 respectively.

Countries agreed to return in 2023 to attend COP28 in the United Arab Emirates to review and strengthen these goals.

4.7.4 UK Climate Change Programme

Sixth Carbon Budget 2020

Following on from the Climate Change Committee's (CCC) Net Zero - The UK's Contribution to Stopping Global Warming 2019, the CCC (2019; 2020) published its recommendations for the UK's Sixth Carbon Budget which will run from 2033 to 2037 with the aim of achieving a fully decarbonised UK economy.

The principal recommendation from the CCC is that the UK sets a Sixth Carbon Budget to require a reduction in UK greenhouse gas emissions of 78% by 2035 relative to 1990, or a 63% reduction from 2019.

The sixth budget, imposed by the Carbon Budget Order 2021 on 24 June, covers the years 2033-2037 (UK Government, 2021a). The UK Government set the budget at 965 million tonnes of carbon dioxide equivalent. This is in line with the CCC's recommendation (CCC, 2021).

Net Zero Strategy: Build Back Greener

In October 2021, the UK Government's (2021b) Net Zero Strategy was presented to the UK Parliament In accordance with Section 14 of the Climate Change Act 2008 (UK Government, 2008). It acknowledges the devastating impact that the increase of

global temperatures has already had on the UK through flooding and disruption to major services.

In line with the Paris Agreement (UNFCCC, 2015), reference is made to potentially catastrophic events that will unfold should global warming increase above 1.5 degrees. It is recognised that in order to meet the Paris Agreement, urgent global action is needed hence why the UK called for ending coal fired power generation, retiring petrol and diesel engines from all cars, and halting deforestation at COP26.

The strategy sets out clear policies and proposals for keeping the UK on track for forthcoming carbon budgets, ambitious Nationally Determined Contribution (NDC), and the UK Government's vision for a decarbonised economy in 2050.

The strategy has a number of commitments for reducing emissions across the economy in relation to power generation. For instance, the target that the UK government will take action so that by 2035, all electricity will come from low carbon sources, bringing forward the government's commitment to a fully decarbonised power system by 15 years.

In 2019, net UK GHG emissions from the power sector totalled 58 tonnes of CO_2 and accounted for 11% of total net UK GHG emissions. This is a reduction of 72% between 1990 and 2019. In 1990, the power sector accounted for 23% of UK GHG emissions. This has largely been achieved through renewables and natural gas generation displacing coal.

The UK Government's vision is that low carbon forms of energy generation will be the paradigm shift away from the use of unabated oil and gas. Low carbon energy is expected to account for a 50% or higher share of final energy consumption. This shift to low carbon energy is expected to account for up to 76% reduction in emissions by 2030; up to 85% by 2035 and 98% by 2050, when compared with 2019 emissions.

In delivering this strategy of decarbonising the power sector, significant public and private investment is needed and will see new employment opportunities across the UK. The UK Government estimate that policies and proposals to reduce emissions in the sector could support up to 59,000 jobs by 2024 and up to 120,000 jobs by 2030.

UK Climate Change Risk Assessment 2022

The third UK Government (2022) Climate Change Risk Assessment (CCRA3) report was presented to Parliament on 17 January 2022 and outlines the UK Government and devolved administrations' position on the key climate change risks and opportunities that the UK faces.

The Technical Report for the CCRA3 identified 61 UK-wide climate risks and opportunities across multiple sectors such as energy; agriculture; people; transport and biodiversity if there is a 2-degree and 4-degree global warming scenario (Betts and Brown, 2021).

Of the 61 climate risks and opportunities 34 risks are assessed as 'more action needed' at a UK-wide level. This means that new, stronger, or different government action is required in the next five years over and above those already planned.

Some of the risks include:

- Risk to soils from changing climatic conditions, including seasonal aridity and wetness;

- Risks and opportunities for natural carbon stores, carbon sequestration and GHG emissions from changing climatic conditions, including temperature change and water scarcity;
- Risks to and opportunities for agricultural productivity from extreme events and changing climatic conditions (including temperature change, water scarcity, wildfire, flooding, coastal erosion, wind and saline intrusion);
- Risks to infrastructure services from river, surface water and groundwater flooding;
- Risks to public water supplies from reduced water availability;
- Risks to health and wellbeing from high temperatures;
- Risks to people, communities and buildings from river and surface flooding; and
- Risks to UK food availability, safety, and quality from climate change overseas.

4.7.5 Scotland Climate Change Programme

Climate Change (Emission Reduction Targets) (Scotland) Act 2019

Amending the Climate Change (Scotland) Act 2009, the Climate Change (Emission Reduction Targets) (Scotland) Act 2019, emphasises the need to deliver renewable energy targets and focuses on giving considerable weighting to the determination of renewable energy proposals (Scottish Government, 2009; 2019b).

These include wind farm applications in areas where the principle of development has already been established.

The Act strengthens Scotland's climate change targets for the reduction of emission levels from an 80% reduction by 2050 (as set out in the Scottish Government (2009) Climate Change (Scotland) Act), to 100% by 2045. Renewable energy projects, such as the Proposed Development, play a key role in supporting the decarbonisation of the energy sector.

Scotland's Climate Assembly: Recommendations for Action (2021)

As required by the Climate Change (Emissions Reduction Targets) (Scotland) Act 2019 (Scottish Government 2019b) the Assembly on climate change was established. The Assembly comprises a group of over 100 people selected to be representative of Scotland's adult population. The Assembly published their Recommendations for Action in June 2021.

The Recommendations for Action outlined several goals and recommendations across a variety of sectors aimed at addressing the climate emergency in an effective and fair way. The report identified eradicating fossil fuels as a priority through the maximisation of energy generation via renewables.

The Scottish Government (2021a) issued their Response to Scotland's Climate Assembly in December 2021. The Scottish Government set out their intention to publish an Energy Strategy Just Transition Plan (ESJTP), a consultative draft of which was published on 10 January 2023 (Scottish Government, 2023b).

Towards a Robust, Resilient Wellbeing Economy for Scotland, a report of the Advisory Group on Economic Recovery (June 2020)

Established by the Scottish Government (2020a) in April 2020, the advisory group focusses on the economic recovery following the Covid pandemic. It recognises that the pandemic provides the opportunity to revaluate Scotland's economic ambition.

In particular, there is a renewed emphasis on the need to accelerate transition to a low carbon economy and support renewable technology with the aspiration of tackling climate change and developing a resilient economy.

Update to the Climate Change Plan 2018-2032: Securing a Green Recovery on a Path to Net Zero

The Scottish Government (2020b) published its updated Climate Change Plan in December 2020. This update to the 2018-2032 Climate Change Plan, along with the Scottish Government (2021b) Energy Strategy: Position Statement (2021) provides the strategic framework for the transition to a low carbon Scotland.

The Update sets ambitious new targets to end Scotland's contribution to climate change by 2045 and sets out the commitment to reduce emissions by 75% by 2030 (compared with 1990) and to net zero by 2045. It states that COVID-19 does not change Scotland's ambitions and indeed, gives Scotland the opportunity to lead the way in meeting climate change targets.

4.7.6 Scottish Energy Strategy (2017)

The Scottish Energy Strategy (SES): The Future of Energy in Scotland was published in December 2017 and set out the Scottish Government (2017b) vision for the future energy system in Scotland. It articulates six energy priorities for a whole-system approach that considers both the use and the supply of energy for heat, power and transport.

Sitting alongside the Climate Change Plan, SES is intended to strengthen the development of local energy, protect and empower consumers, and support Scotland's climate change ambitions while tackling poor energy provision.

Built around a series of six energy priorities, the SES will guide the decisions that the Scottish Government, working with partner organisations, needs to make over the coming decades.

Specifically in relation to renewable energy generation, this includes the commitment to;

> "*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*".

The SES sets two new targets for the Scottish energy system by 2030:

- The equivalent of 50% of the energy for Scotland's heat, transport and electricity consumption to be supplied from renewable sources; and
- An increase by 30% in the productivity of energy use across the Scottish economy.

For the longer term the SES states 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*"

It is important to note that this commitment has been brought forward to 2045 following the Climate Change (Emission Reduction Targets) (Scotland) Act 2019 and noted in the Scottish Government (2021b) Energy Position Statement.

In setting out this target, the Scottish Government analysis that sits behind it is described as indicating that renewable electricity has already outperformed targets, stating that;

> "the *interim 2015 target of 50% – could rise to over 140% of Scottish electricity consumption, ensuring its contribution to the wider renewable energy target for 2030*."; and

> "*This assumes a considerably higher market penetration of renewable electricity than today – requiring in the region of 17 GW of installed capacity in 2030 (compared to 9.5 GW in June 2017) – with greater interconnection with parts of continental Europe providing an expanded market for our electricity*".

In championing the potential of Scotland's huge renewable energy resource, the SES recognises that renewable and low carbon energy will provide the foundation of the envisaged future energy system and considers onshore wind to be amongst the lowest cost forms of renewable power generation.

The SES is clear that onshore wind should continue to play a vital role in decarbonising Scotland's energy systems and confirms the importance of supporting onshore wind development, including the extension and replacement of existing sites with larger turbines, in the right places.

Identifying and providing a route to market for onshore wind energy is recognised in the SES as key to achieving the objectives and vision of the strategy and refers to further detail provided in the Scottish Government Onshore Wind Policy Statement 2017 (Scottish Government, 2017a) which was published alongside the SES.

4.7.7 Scotland's Energy Strategy Position Statement (2021)

Published in March 2021, the Scottish Government (2021b) Position Statement provides an overview of key priorities for the short to medium-term in ensuring a green economic recovery and emphasises that Scotland has the most ambitious legislative framework for emissions reduction in the world and a particularly challenging interim target for 2030, underpinned by a legal commitment to deliver a just transition.

It recognises that Scotland is making progress towards its target and in 2019, Scotland's renewable electricity generation was able to meet the equivalent of 90% of its gross electricity consumption.

The need for the continued development of the renewable energy sector in Scotland is emphasised within the Position Statement (Scottish Government, 2021b), where is noted that:

> *"The continued growth of Scotland's renewable energy industry is fundamental to enabling us to achieve our ambition of creating sustainable jobs as we transition to net zero."*

This point is further illustrated by recent statistics from Scottish Renewables (2023) and the Scottish Energy Statistics Hub (2023c) which show that:

> *"renewable electricity generation is now equivalent to approximately 97% of Scotland's gross electricity consumption."*

The Statement was published to set out a clear overview of policies in relation to energy ahead of COP26 in November 2021. It reinforces Scotland's commitment to;"*…supporting the increase of onshore wind in the right places to help meet the target of Net Zero",* whilst ensuring *a "green, fair and resilient recovery"* for the Scottish economy.

It is clear in its position that: "*The potential remains for much more renewable capacity and development across Scotland*".

In a recent report by the Climate Change Committee (CCC, 2023), Scotland's emissions in 2021 were 2% higher than in 2020 levels but remaining 10 % below pre-pandemic (2019) levels and 49.2 % below 1990 levels.

Scotland therefore did not meet its 2021 annual target of a 51.1% reduction compared to 1990 levels (CCC,2023). The necessity to achieve national emissions targets underscores the requirement for increased deployment of renewable energy sources.

4.7.8 Draft Energy Strategy and Just Transition Plan (2023)

The Draft Energy Strategy and Just Transition Plan was published on 10 January 2023 (Scottish Government, 2023b). The Scottish Government's key ambitions for Scotland's energy future are detailed, as well as; "*…proposing a vision for a just energy transition…*" which provides socioeconomic benefits whilst protecting the environment and providing energy security.

Expanding the energy generation sector is identified as a key ambition with offshore wind, onshore wind, solar and hydrogen listed as just some of the sources which should have the potential to make up the energy mix.

The draft Just Transition Plan emphasises the Scottish Government's focus on; "*…collaboration between people from all parts of Scotland and all walks of life…*", ensuring that workers, businesses, communities and consumers have all played a key part in forming the draft through early codesign.

This is a consultative draft, with responses invited until 9 May 2023, after which they will be used in combination with continuing engagement to further develop the Strategy and Plan. The final version is expected to be published in summer 2024.

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