BAILLIE GREENER GRID PARK

LAND WITHIN BAILLIE WIND FARM, WEST OF THURSO

PLANNING STATEMENT

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TABLE OF CONTENTS

EXECUTIVE SUMMARY

This Planning Statement is produced in support of an application requesting planning permission for a Greener Grid Park at land within Baillie Wind Farm, West of Thurso. The Application is made by Statkraft UK LTD to the Highland Council, with this Planning Statement being produced on behalf of the Statkraft UK LTD by Arcus Consultancy Services Ltd.

This Statement and the accompanying reports are considered to provide all the relevant information required for the Council to make a positive determination of the Application. This Statement sets out the requirement for the Development and the benefit of synchronous compensators providing grid stability and energy storage for the purpose of balancing the supply and demand of energy and contributing to the efficient operating of a renewable energy-based system.

As per the Town and Country Planning (Scotland) Act 1997 (as amended), the determination of a planning application should be based on its accordance with the local development plan, unless material considerations indicate otherwise. This Statement addresses, in detail, all relevant policies from the Highland-wide Local Development Plan and determines that the Development fully accords with all policies contained therein.

Beyond compliance with the Highland-wide Local Development Plan, consideration must be given to the role that energy management and storage can provide in the renewable energy industry. Renewable energy is dependent upon weather conditions and the ability to manage supply and demand of energy in the instances when conditions impact supply is integral to the efficiency of the industry, and the ability to achieve national and European goals of decarbonisation and climate change action.

The climate emergency has accelerated the need to decarbonise the energy supply and the outcomes of the recent COP26 conference, and the October 2021 Net Zero Strategy, means that even more aggressive action needs to be taken. This needs to be reflected in positive local determinations for developments that can contribute to the overall national and international Net Zero commitments.

Taking into account all policies relevant to the proposed Development and material considerations, the Development is considered to comply with policy and legislative aims at local, national and European levels. It is therefore requested that planning permission for the Development is granted.

1 INTRODUCTION

1.1 Background

This Planning Statement ('the Statement') has been prepared to accompany a planning application ('the Application'), submitted to the Highland Council ('the Council') by Arcus Consultancy Services Ltd ('Arcus'), on behalf of Statkraft UK LTD ('the Applicant') for the development of a greener grid park ('the Development'), to support the flexible operation of National Grid and decarbonisation of electricity supply by balancing electricity supply and demand.

This Site comprises an area of approximately 1.99 hectares (ha) and is located at land within Baillie Wind Farm, west of Thurso ('the Site'). The site is located approximately 1 kilometre (km) northeast of Shebster, 3.6 km southeast of Lower Dounreay and 8.6 km southwest of Thurso. The location of the Site and layout of the Development are shown on Planning Drawings 1 and 2, respectively.

The Application for the Development is made under the Town and Country Planning (Scotland) Act 1997[1], as amended by the Planning etc. (Scotland) Act 2006[2] ('the Planning Act').

The purpose of this Statement is to outline the Development, the framework for determination, and to provide an assessment of the Development against the context of planning policy and energy targets.

1.2 The Applicant

The Applicant is Statkraft UK LTD. Statkraft is 100% owned by the Norwegian state and is Europe's largest generator of renewable energy. In the UK Statkraft develop, own and operate wind, solar, hydro and Greener Grid Park projects. Since 2006 Statkraft has invested over £1.4 billion in the UK's renewable energy infrastructure and is a leading provider of Power Purchase Agreements (PPAs), having facilitated over 6 GW of new-build renewable energy generation through PPAs. Statkraft is contracted to deliver grid stability services to National Grid ESO, supporting their target to deliver a zero-carbon electricity system by 2025. The first two projects in Moray and Liverpool are currently in construction.

1.3 Need for the Development

Renewable technologies are intermittent as the amount of energy generated is dependent on weather conditions. It is therefore necessary to balance demand and supply in order to prevent shortages and blackouts, such as those experienced in the South East of England in August 2019, and interconnector failures, such as those experienced in France in 2021.

In September 2021, the National Grid released clarifications[3] on the role that interconnectors and stabilising technology plays in the wider renewable energy industry, acknowledging that they would:

- Play a vital role in helping us to reach Net Zero;
- Help to reduce energy costs;
- Play a critical role in sharing clean energy between the UK and the EU; and

[1] Scottish Government (1997) Town and Country Planning (Scotland) Act 1997 [Online] Available at: https://www.legislation.gov.uk/ukpga/1997/8/contents (Accessed 17/09/2021)
[2] Scottish Government (2006) The Planning etc. (Scotland) Act 2006 [Online] Available at: https://www.legislation.gov.uk/asp/2006/17/contents (Accessed 17/09/2021)
[3] National Grid (2021) *Interconnectors – separating the myths from the facts* [Online] Available at: https://www.nationalgrid.com/stories/engineering-innovation-stories/interconnectors-separating-myths-facts (Accessed 14/10/2021)

- Help the UK to reduce our carbon emissions.

Renewable energy and the ability to successfully manage its supply is critical to stabilising fluctuating fuel prices[4]. As fossil fuel generating stations are constrained by resources there is an inevitable price fluctuation. Whereas a system that prioritised well-balanced, renewably sourced electricity would not be affected by the same market-related volatility.

As such, there is a growing demand by network operators for a broad range of services such as providing stability, storage and management. The Development is designed to support the flexible operation of the National Grid and the decarbonisation of the electricity supply.

As there continues to be a transition away from fossil fuels for powering vehicles, strengthening the reliability of cleanly-sourced energy for powering electric cars is a necessity. Developments that balance and stabilise this supply will be invaluable in responding to market evolution.

The Atkins Report – Engineering Net Zero – The Race to Net Zero 2020[5] dispels the myth that the UK can achieve Net Zero without further concerted action in relation to how we generate and distribute electricity.

This Report quantifies the minimum requirement for new generation of energy to meet Net Zero by 2050 at 250 GW, with the UK system needing between 15 and 30 GW of new storage, during this time.

To put this into perspective, "*the UK currently has 3.1GW of capacity in pumped storage plus about 1GW in batteries. We may need up to ten times this to achieve net zero.*"

The proposed Greener Grid Park would provide rapid-response electrical back-up to the National Grid and would represent an early deployment within the UK of a high-tech grid balancing facility. This is required for a number of reasons:

- Electricity Market Reform;
- The Capacity Market; and
- Balancing the Network.

1.3.1 *National Grid Pathfinder*

National Grid are committed, through the Network Option Assessment Stability Pathfinder, to meet a 2025 zero carbon operation target for grid stability services[6].

Statkraft's planning application is not only for a Battery Energy Storage System (BESS) but predominately for the installation of Synchronous Compensator(s) to provide Stability to National Grid Energy System Operator (NGESO). This project is called a Greener Grid Park to highlight its function of decarbonising the grid system and enabling greater use of the increasingly abundant transmission connected sources of renewable.

Baillie is in an area identified by NGESO with as an area with need, which has led to the Stability Phase 2 service as shown in Figure 1.1. A grid without inertia is one that is unstable, suffers from issues of power quality and is susceptible to blackouts. Energy sourced from renewable generators such as wind and solar connect to the grid

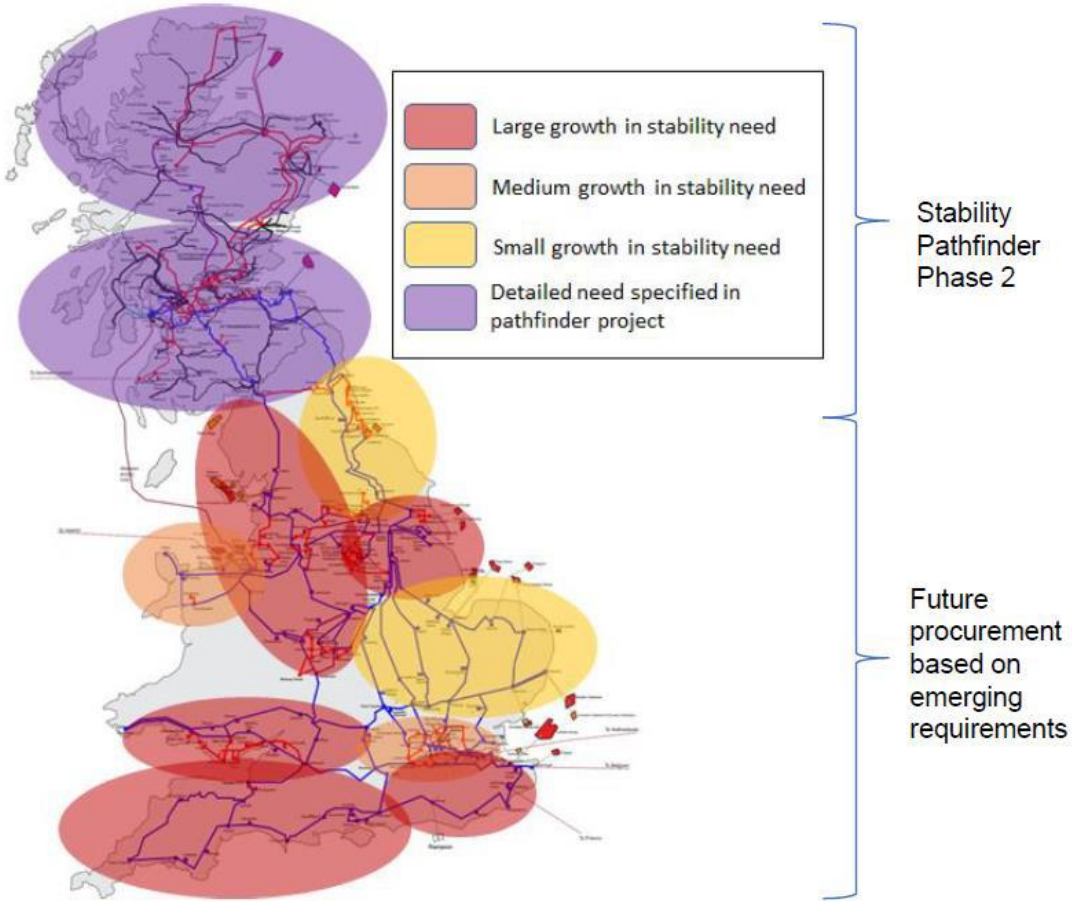
[4] The Guardian (2021) *Government should have moved earlier to low-carbon, say industry experts* [Online] Available at: https://www.theguardian.com/business/2021/sep/21/government-should-have-moved-earlier-to-low-carbon-say-industry-experts (Accessed 14/10/2021)

[5] Atkins & SNC Lavalin (2020) *Engineering Net Zero: The Race to Net Zero* [Online] Available at: https://www.snclavalin.com/~/media/Files/S/SNC-Lavalin/download-centre/en/report/the-race-to-net-zero.pdf (Accessed 17/09/2021)

[6] National Grid (2020) *How our new spin on grid stability is a boost for renewable generation* [Online] Available at: https://www.nationalgrideso.com/news/how-our-new-spin-grid-stability-boost-renewable-generation (14/10/2021)

infrastructure in a different way than fossil fuels, and fit for purpose stability infrastructure needs to be developed.

Figure 1.1: Areas of Stability Requirement



In January 2020, Statkraft was successful in NGESO's Stability Phase 1 Tender. NGESO stated that this would save consumers £128 million in the contract period up to 2025/26. Statkraft are constructing two of these projects (one at Keith in Moray, Scotland and one at Lister Drive in Liverpool, England) as reported in Machinery Magazine[7]. The Baillie Greener Grid Park will host similar technology to these developments.

1.3.2 *Decarbonisation and Climate Change*

Rapid decarbonisation before 2030 is important and valuable in a Climate Emergency. Highland Council has declared a climate emergency and are committed to achieving Net Zero carbon emissions in line with national targets. Statkraft's Greener Grid Park is contributing to the Scotland and the UK's commitment to carbon emissions reductions and combatting climate change, in line with the policy context set out in Section 5 of this Statement.

As a global energy company, strategically focused on scaling renewable energy solutions, Statkraft believes that it can be instrumental in driving progress toward achieving the UN Sustainable Development Goals (SDGs) by 2030. Statkraft have numerous initiatives that can be linked to different SDGs, these positive impacts are naturally concentrated around

[7] Machinery (2021) *Machinery March 2021* [Online] Available at: https://my.mydigitalpublication.co.uk/publication/?m=65921&i=696681&p=10&ver=html5 (Accessed 14/10/2021)

the goals for Climate Action (SDG 13). Statkraft contribute directly to climate change mitigation by displacing fossil fuels whilst meeting growing energy demand.

This information has been provided to demonstrate the need for the Baillie Greener Grid Park and to differentiate Statkraft's project from other planning applications which are only for BESS. Whilst these technologies are important for the energy transition and decarbonisation, they are not as effective as Statkraft's proposal in decarbonising the grid and meeting the climate targets set out in Section 5 of this Statement.

1.3.3 *Electricity Market Reform*

Given the reduction in centralised coal-fired power, increasingly cheap but intermittent renewable energy supply and the transition to electric vehicles, it is increasingly likely there will be peaks and troughs in the UK energy supply and demand.

It is estimated that over the next decade, the UK will require approximately £100 billion investment in electricity infrastructure to accommodate projected future increases in electricity demand, replace ageing power stations and prevent electricity blackouts. The Development is proposed in response to the requirement for continuity of supply and storage of electricity, particularly during periods of peak demand and over-supply.

Electricity Market Reform ('EMR')[8] is a UK government policy designed to:

- Incentivise investment in secure, low-carbon electricity;
- Improve the security of the UK's electricity supply; and
- Improve affordability for consumers.

The UK's electricity grid has historically relied on large centralised power plants. However, old coal power plants are in the process of reducing capacity and closing as they no longer meet the required environmental and performance standards and existing nuclear power plants are reaching the end of their design lives, while the delivery of new nuclear plants has been beset by delays. In parallel, there is the requirement to deliver a greater amount of renewable energy but these technologies (e.g. wind and solar generation) are intermittent, only generating when the wind blows or sun shines. These different factors mean that demand and supply are more challenging to match.

1.3.4 *The Capacity Market*

Through the Energy Act 2013[9], the Capacity Market mechanism was introduced to ensure security of electricity supply at the least cost to the consumer.

To deliver a supply of secure, sustainable and affordable electricity, the UK needs not only investment in new generation projects and innovative technologies but to get the best out of existing assets on the network. The Capacity Market aims to deal with both these issues by bringing forward new investment while maximising current generation capabilities.

The Capacity Market aims to balance the difference between demand and supply and to bring forward investment in new generation projects and innovative technologies, in parallel with maximising the utilisation of the existing generation capacity. The Capacity Market operates alongside the electricity market, which is where most participants will continue to earn the majority of their revenues. The Development is anticipated to participate in the Capacity Market in addition to providing other balancing services to the National Grid.

[8] UK Government (2012) Electricity Market Reform: Policy Overview [Online] Available at: https://www.gov.uk/government/publications/electricity-market-reform-policy-overview--2 (Accessed 17/09/2021)
[9] UK Government (2013) Energy Act 2013 [Online] Available at: http://www.legislation.gov.uk/ukpga/2013/32/contents/enacted (Accessed 17/09/2021)

1.3.5 *Balancing the Network*

Balancing the system to ensure demand is met by supply is a key requirement of the National Grid, and it is becoming more challenging as intermittent generation – such as wind and solar power – becomes a bigger proportion of the overall energy mix.

The National Grid has a constant supply of 'extra power' available for use when the power required by customers is not equal to the power generated and a reserve supply. The Balancing Mechanism is used to ensure that the network is in balance and reserve power is then used when the network comes under 'stress'.

When unforeseen demand is put on the network, such as when a large power station suddenly comes offline, then the National Grid control room need an alternative source of power. This is achieved with rapid responding facilities such as the proposed Development which can absorb energy from the grid as instructed.

As an innovative technology, the Development will provide a flexible and rapid release of electricity to allow the National Grid to regulate electricity supply and demand without any greenhouse gas emissions. Conversely, the Development will also have the capacity to absorb electricity quickly which will allow for the oversupply of the grid to be managed.

1.4 Site Selection Criteria

The Site comprises land associated with the existing Baillie Wind Farm. The land is open field within the consented wind farm red line application area, with some rough grazing for livestock. Following a review of the Scotland's Soils: Soils Map[10] which details the national scale land capability for agriculture, the Site is located within land classified as Class 4.2 (land capable of producing a wide range of crops, primarily on grassland with short arable breaks of forage crops).

The Site is located at approximately 101 m to 108 m above ordnance datum (AOD) with a gentle incline from the east to the west of the Site.

The Site is bound on all sites by land associated with the Baillie Wind Farm and the established wind farm tracks adjoin the entrance on the eastern boundary.

The Development is located within the existing Baillie Wind Farm, which allows for a harmonious relationship between a site of energy generation and energy storage and redistribution. The close proximity will allow for the placement of appropriate infrastructure close by, to work together in balancing the supply and demand of renewable electricity.

The Development will focus on delivering stability but will also include BESS to allow the project to provide energy storage. BESS can be sited at any location on the transmission or distribution electricity networks, although there are additional locational price signals which encourage projects to locate in areas beneficial to the grid system and electricity market. However, when co-locating stability and BESS technologies, developing anywhere is not possible and Statkraft have to be more selective about the location of the development.

The other key criteria which have led to the Site being selected for energy management development include:

- The Site is one of the locations preferred and targeted by National Grid ESO;
- There is a 275kV connection option at an existing tower on the 275kV double circuit overhead line;
- The Site is located in the most northern part of the GB transmission network;
- The site is within an area of high wind generation and export;
- The character of the Site and surrounding area;

[10] Scotland's Soils (2017) Land Capability for Agriculture in Scotland [Online] Available at: (Accessed 05/11/2021)

- Separation from residential properties;
- Topography;
- Ease of access to the site for construction; and
- Lack of environmental constraints (e.g., ecological/landscape designations, flood risk, etc.).

Following consideration of the above factors and the existing infrastructure within the wider area, the selected site was identified as having excellent potential for development with minimal environmental impacts.

1.5 The Planning Application Submission

After pre-application consultation with the Council, the following agreed upon environmental and technical reports are appended to this Planning Statement:

- Appendix 1 – Design and Access Statement
- Appendix 2 – Landscape and Visual Appraisal;
- Appendix 3 – Outline Sustainable Drainage Strategy;
- Appendix 4 – Preliminary Ecological Appraisal;
- Appendix 5 – Landscape Planting Plan;
- Appendix 6 – Noise Impact Assessment;
- Appendix 7 – Heritage Impact Assessment;
- Appendix 8 – Transport Statement; and
- Appendix 9 – Framework Traffic Management Plan.

The following plans and drawings are submitted alongside the planning application:

- Planning Drawing 1 – Location Plan;
- Planning Drawing 2 – Proposed Site Layout Plan;
- Planning Drawing 3 – Indicative Palisade Fence Detail;
- Planning Drawing 4 – Indicative Palisade Gate Detail;
- Planning Drawing 5 – Indicative Battery Container;
- Planning Drawing 6 – Indicative 275kV Transformer;
- Planning Drawing 7 – Indicative Inverter Cabinets;
- Planning Drawing 8 – Indicative Synchronous Compensator Building;
- Planning Drawing 9 – Indicative Communications Room;
- Planning Drawing 10 – Indicative Cooler;
- Planning Drawing 11 – Indicative Security Column
- Planning Drawing 12 – Indicative Emergency Diesel Generator;
- Planning Drawing 13 – Indicative LV Electrical House;
- Planning Drawing 14 – Indicative Welfare Facility Container;
- Planning Drawing 15 – Indicative SHETL Distribution Container;
- Planning Drawing 16 – Indicative Statkraft Distribution Container;
- Planning Drawing 17 – Indicative Water Cooler Pump Skid;
- Planning Drawing 18 – Indicative Lube Oil Pump Skid;
- Planning Drawing 19 – Indicative 2500 kVA/690V Transformer;
- Planning Drawing 20 – Indicative 1000 kVA/400V Transformer;
- Planning Drawing 21 – Indicative Noise Attenuation Fencing;
- Planning Drawing 22 – Indicative Synchronous Compensator HV control and Protection; and
- Planning Drawing 23 – Indicative Switchgear Container

2 THE DEVELOPMENT

2.1 Overview

The Applicant is seeking planning permission for the construction and operation of a Greener Grid Park.

The Development is designed to support the flexible operation of the National Grid and decarbonisation of electricity supply. The Development will store, import and export electricity but will not generate any additional electricity nor have any direct on-site emissions of CO_2.

2.2 Development Infrastructure

The Development will consist of the following components, as shown on the Site Layout Plan (Planning Drawing 2):

- 60 no. battery units (each 12.9m x 2.44m x 2.59m)
- 2 no. Synchronous Compensator building (each 38.6m x 20.7m x 10.0m envelope)
- 2 no. water cooler pump skid (each 6.35m x 2.05m x 2.6m)
- 6 no. switchgear containers (each 12.2m x 2.44m x 3.0m)
- 6 no. inverter units (each 6.1m x 2.44m x 2.59m)
- 1 no. welfare facility (12.9m x 3.45m x 2.59m)
- 1 no. SHETL Distribution Container (12.19m x 3.45m x 2.59m)
- 1 no. Statkraft Distribution Container (12.19m x 3.45m x 2.59m)
- 2 no. Synchronous compensator HV control and protection (12.19m x 3.45m x 2.59m)
- 2 no. LV electrical house (each 12.19m x 3.45m x 2.59m)
- 1 no. Synchronous Compensator Comms House (12.19m x 2.44m x 2.59m)
- 1 no. BESS Comms House (12.19m x 2.44m x 2.59m)
- 1 no. 275kV AIS & Transformer (36.8 m x 18.6 m x 7.05 m)
- 2 no. 2500kVA 690V Transformers (each 4.0m x 4.0m x 2.9m)
- 6 no. 1000kVA 400V BoP Auxiliary Transformers (each 3.0m x 3.0m x 2.14m)
- 2 no. lube oil pump skid (each 2.15m x 1.1m x 1.1m)
- 6 no. air blast coolers (each 9.6m x 2.4m x 2.5m)
- 1 no. emergency diesel generator (6.1m x 3.6m x 2.9m)
- 5 no. security columns of 6 m in height with CCTV cameras located at various points around the site boundary;
- Internal roads;
- 4.0 m high noise attenuation fencing; and
- 3.4 m high palisade gate and electric security palisade fencing.

Most components of the development will be housed in steel container-style units, while the palisade fencing and electric fence will provide security. The approach to design included ensuring that the aesthetic of the units was as low-impact on the receiving landscape as possible.

2.3 Access

The Development will be accessed from the existing roads infrastructure associated with the Baillie Wind Farm. The location of the access point has been demonstrated to the Council throughout the pre-application process.

Vehicle movements to the Site during the operation of the Development will comprise activities associated with inspection, monitoring and general site up-keep. It is anticipated that such visits will occur up to once per week on average and be via van or other similar sized vehicles. The Site will not be manned.

Vehicle movements will make use of the existing internal wind farm tracks for access.

Further details are provided in the accompanying Design and Access Statement and Transport Statement.

2.4 Construction

The Development is expected to be constructed over a 12-month period.

Further details are provided in the accompanying Transport Statement and Framework Traffic Management Plan.

3 PLANNING HISTORY

3.1 Previous Applications

The historic planning application within the Site boundary relate to the existing wind farm and associated infrastructure. There are also EIA Screening Opinion request submissions, which are detailed further at section 3.3 of this Statement.

Table 3.1: Previous Planning Applications

Application	Description of Development	Application Date	Status	Determination Date
04/00178/FULCA	Erection of 60 metre high anemometer mast (retrospective)	10/05/2004	Application Permitted	02/09/2004
04/00342/S36CA	Erection of 21 wind turbines 70 metres to hub and associated infrastructure	13/07/2004	Approved by Scottish Ministers	14/01/2010
06/00185/FULCA	Renewal of planning consent for the erection of 60 metre high anemometer mast and ancillary equipment	22/03/2006	Application Permitted	19/05/2006
21/01186/SCRE	Greener Grid Park energy management facility for the purposes of balancing supply and demand of electricity	10/03/2021	Screening Application EIA not required	15/04/2021
21/04401/SCRE	Greener Grid Park energy management facility for the purposes of balancing supply and demand of electricity	10/09/2021	Screening Application EIA not required	01/10/2021

3.2 Pre-Application Advice

On 10th March 2021, Arcus submitted a Pre-Application Advice request to the Council for preliminary advice on the Development. Due to the Council's procedures relating to local applications, no formal meeting could be held; however, a written Pre-Application Advice response was provided by the Council on 25th May 2021.

The advice contained within this response has influenced the scope of assessment provided in support of the Application.

3.3 EIA Criteria and Screening

Regulation 2 (1) of the Town and Country Planning (Environmental Impact Assessment) (Scotland) Regulations (2017)[11] ('the EIA Regulations') defines EIA development as either:

- Schedule 1 Development - development of a type listed in Schedule 1 always requires EIA; or
- Schedule 2 Development - development of a type listed in Schedule 2 requires EIA if it is likely to have significant effects on the environment by virtue of factors such as its nature, size or location.

Energy management developments are not listed within Schedule 1 of the EIA Regulations. Within Schedule 2, a development area threshold in excess of 0.5 hectares is applied to Category 10 (a): *"Industrial estate development projects"*, and Category 3 (a): "*Industrial installations for the production of electricity, steam and hot water (unless included in Schedule 1)*".

Given that the Site area exceeds this threshold, the requirement for an EIA is determined by considering the selection criteria detailed within Schedule 3 of the EIA regulations. The Selection Criteria in Schedule 3 includes an assessment of the following:

- Characteristics of the Development;
- Location of the Development; and
- Characteristics of the Potential Impact.

On 10th March 2021, a request for an EIA Screening Opinion was submitted to the Council (Reference: 21/0003/EIASCR). A Screening Response was issued on 26th April 2021, confirming that following an assessment, the proposal is considered unlikely to result in significant environmental effects and therefore an EIA is not required for the development.

Following a revision to the site boundary and location of the site infrastructure, a new screening request (Reference: 21/04401/SCRE) was submitted to the Council. A Screening Response was issued on 1st October 2021, confirming again that the proposal is considered unlikely to result in significant environmental effects and therefore an EIA is not required for the development.

[11] Scottish Government (2017) the Town and Country Planning (EIA) (Scotland) Regulations 2017 [Online] Available at: http://www.legislation.gov.uk/ssi/2017/102/contents/made (Accessed 17/09/2021)

4 KEY LEGISLATION

4.1 Town and Country Planning (Scotland) Act 1997

Section 25 of the Town and Country Planning (Scotland) Act 1997 (as amended) states:

"Where, in making any determination under the Planning Acts, regard is to be had to the development plan, the determination is, unless material considerations indicate otherwise– a) to be made in accordance with that plan."

Section 37(2) of the Town and Country Planning (Scotland) Act 1997 (as amended) states:

"In dealing with such an application the authority shall have regard to the provisions of the development plan, so far as material to the application, and to any other material considerations".

Based on the above, the process for determining a planning application made under the Town and Country Planning (Scotland) Act 1997 (as amended) can therefore be defined as:

- Identification and consideration of the key provisions within the Development Plan;
- Clarification of whether the Development is in accordance with the Development Plan;
- Identification and consideration of relevant material considerations; and
- Conclusions on whether planning consent is justified.

4.2 Climate Change Scotland Act 2009

The Climate Change (Scotland) Act 2009[12] (the 2009 Climate Change Act) creates a long-term framework for the current and successive administrations in Scotland to ensure a reduction in Scottish greenhouse gas emissions by 80% by 2050 with an interim milestone of 42% by 2020.

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

The Scottish Government introduced the new Climate Change (Emissions Reduction Targets) (Scotland) Bill (the Climate Change Bill) to Parliament on 23rd May 2018, and was passed on 25th September 2019, and received Royal Assent on 31st October 2019, becoming the Climate Change (Emissions Reduction Targets) (Scotland) Act 2019[13] (the 2019 Climate Change Act).

The 2019 Climate Change Act amends the 2009 Climate Change Act and originally increased the 2050 target to 90%. In line with advice from the Committee on Climate Change (CCC) on 2nd May 2019, the Scottish Government amended the Climate Change Bill to set a target date of 2045 for reaching net-zero emissions[14], as per the resultant 2019 Climate Change Act.

Setting a 'carbon neutral', net-zero target of 2045 is ambitious and ahead of the rest of the United Kingdom's target of 2050. The Government has set ambitious targets for reduction of carbon emissions. Renewable energy projects, such as the Development, play a key role in aiding the decarbonisation of the energy sector.

[12] Scottish Parliament (2009) *The Climate Change (Scotland) Act 2009* [Online] Available at: http://www.legislation.gov.uk/asp/2009/12/contents (Accessed 17/09/2021)

[13] Scottish Parliament (2019) *Climate Change (Emissions Reduction Targets) (Scotland) Act 2019* [Online] Available at: https://www.legislation.gov.uk/asp/2019/15/enacted (Accessed 17/09/2021)

[14] Scottish Government (2019) *Climate Change (Emissions Reduction Targets) (Scotland) Bill Marshalled List of Amendments for Stage 2* [Online] Available at https://www.parliament.scot/S5_Bills/Climate%20Change%20(Emissions%20Reduction%20Targets)%20(Scotland)%20Bill/SPBill30MLS052019.pdf (Accessed 17/09/2021)

5 ENERGY POLICY: THE NEED TO ADDRESS CLIMATE CHANGE

This section of the Statement sets out the international, UK, and Scottish energy policy. It provides the framework of international agreement and binding targets upon which national energy policy is based. The international and national policy described and summarised below demonstrates the need for renewable energy from which the Development can draw a high level of support, due its value in stabilising the supply and demand of renewable energy sources.

All of these sections demonstrate the clear and consistent policy support at all levels for the supply of sustainable renewable energy. Renewable energy developments are dependent upon weather conditions and therefore, the synchronous compensators and the sustainable storage of energy for the purpose of stabilising the grid and balancing supply and demand, is an integral component of a successful renewable energy industry. As such this Development should be viewed in the context of supporting the achievement of energy policy and legislation.

The Development would provide valuable infrastructure to help Scotland meet its renewable energy production targets, while supporting CO_2 reduction to combat climate change and increasing the security of supply of electricity.

5.1 International, European and UK Policy Context

5.1.1 *COP26*

In November 2021, the United Nations Climate Change Conference (COP26) was convened in Glasgow. The outcomes from COP26 have been clear and prescriptive in the need to address carbon emissions and climate change. Whilst information and initiatives are still being finalised from COP26, one of the first decisive outcomes was the Green Grids Initiative[15] which states that it is the intention of the UN to provide a common framework for efforts on *"developing and deploying cutting edge techniques and technologies to modernise power systems and support green grids which can integrate billions of rooftop solar panels, wind turbines and storage systems".*

5.1.2 *COP 21 Paris Agreement*

On 12 December 2015, 196 Parties to the UN Framework Convention on Climate Change (UNFCCC) adopted the Paris Agreement[16], a legally-binding framework for an internationally coordinated effort to tackle climate change. The Paris Agreement's key aim is to strengthen the global response to climate change by keeping a global temperature rise this century below 2 degrees Celsius above pre-industrial levels and to pursue efforts to limit the temperature increase even further to 1.5 degrees Celsius[17]. The UK is legally bound through commitment to the Paris Agreement.

5.1.3 *Committee on Climate Change Net Zero Report May 2019*

In May 2019, the Committee on Climate Change published Net Zero – The UK's Contribution to Stopping Global Warming[18]. This report responds to a request from the Governments of the UK, Wales and Scotland, asking the Committee to reassess the UK's long-term emissions targets. The report recommends a new emissions target for the UK: net zero

[15] UN Climate Change Conference UK 2021 (2021) *Green Grids Initiative – One Sun One World One Grid* [Online] Available at: https://ukcop26.org/one-sun-declaration-green-grids-initiative-one-sun-one-world-one-grid/ (Accessed 11/11/2021)

[16] United Nations Climate Change - The Paris Agreement (2015) [Online] Available at: https://unfccc.int/process-and-meetings/the-paris-agreement/the-paris-agreement (Accessed 17/09/2021)

[17] UNFCCC 2018 Paris Agreement Overview [online] Available at: https://unfccc.int/process-and-meetings/the-paris-agreement/what-is-the-paris-agreement (Accessed 17/09/2021)

[18] Committee on Climate Change (2019) *Net Zero – The UKs contribution to stopping global warming* [Online] Available at: https://www.theccc.org.uk/publication/net-zero-the-uks-contribution-to-stopping-global-warming/ (Accessed 17/09/2021)

gases by 2050, and recommends a 2045 net-zero target for Scotland to reflect Scotland's greater relative capacity to remove emissions than the UK as a whole. The Report highlights the falling cost of key renewable technologies, which are now generally comparable or lower in cost than power from fossil fuels, whilst bringing significant co-benefits such as reduced air pollution.

5.1.4 *Net Zero Strategy: Build Back Greener*

In October 2021, prior to COP26, the BEIS launched a net zero strategy called Net Zero: Build Back Greener[19]. It is stated how, since 1990, the UK's greenhouse gas emissions have reduced by 44% notwithstanding the economy expanding by over 75%. The strategy sets out the UK Government's vision, policies and proposals for furthering this trend, ending the UK's domestic contribution to man-made climate change, therefore transitioning to a net zero economy by 2050.

Specifically, emphasis is placed on the potential of the power sector to contribute to achieving the ambitious 2050 targets. Policies and proposals for power in the strategy outline the importance of British-made, cheap and clean electricity for the productivity of the net zero economy. The UK government project the power system will be "fully decarbonised" by 2035 with the transformation heavily relying on the use of renewables and flexible storage. One of the Key Power Policies outlines the necessity for "new flexibility measures including storage to help smooth out future price spikes" and thus improve the sector's efficiency.

5.1.5 *The Climate Change Act 2008 (2050 Target Amendment) Order 2019*

On 27 June 2019, the Climate Change Act 2008[20] was amended to introduce a target for at least a 100% reduction in greenhouse gas emissions (compared to 1990 levels) in the UK[21] by 2050. This 'net zero' target is likely to affect and increase future Government renewable and low carbon energy targets and create a more positive policy environment for renewable energy.

5.1.6 *Progress in Reducing Emissions – 2021 Committee on Climate Change Progress Report to Parliament*

The 2021 Committee on Climate Change (CCC) Progress Report to Parliament[22] was published in June 2021 and provides a review of Government efforts over the previous 12 months with regards to Climate Change. While UK emissions fell by 13% in 2020, much of this decline was likely a result of the Covid-19 pandemic and as such, lasting changes are far from certain. The CCC report recommends taking action to transition to a fully decarbonised electricity system. Furthermore, it sets a target to phase out gas-fired electricity generation in the UK by 2035, subject to ensuring security of supply.

There has been significant progress in the transition to renewables, with emissions from electricity having decreased by 65% from 2009 to 2019. However, the CCC report notes that generation shares from renewable resources will need to increase to support the transition to electric vehicles. The International Energy Agency has identified solar power as producing some of the cheapest electricity in history and forecasts that if there is a rapid

[19] HM Government (2021) *Net Zero: Build Back Greener*. [Online] Available at: https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/1028157/net-zero-strategy.pdf (Accessed 10/11/2021)

[20] UK Government (2008) *Climate Change Act 2008* [Online] Available at: https://www.legislation.gov.uk/ukpga/2008/27/contents (Accessed 17/09/2021)

[21] UK Government (2019) *The Climate Change Act 2008* (2050 Target Amendment) Order 2019 (2019 No. 1056) [Online] Available at: http://www.legislation.gov.uk/uksi/2019/1056/made (Accessed 17/09/2021)

[22] Committee on Climate Change (2021) *Progress in Reducing Emissions – 2021 Report to Parliament* [Online] Available at: https://www.theccc.org.uk/publication/2021-progress-report-to-parliament/ (Accessed 17/09/2021)

built-out of renewables (particularly solar and wind), net zero emissions for the power sector can be achieved by 2035 in advanced economies.

5.1.7 *The Sixth Carbon Budget: The UK's path to Net Zero*

On 9 December 2020, the CCC released The Sixth Carbon Budget[23] which updates intermediary targets for the UK's progress to net zero.

"Our recommended pathway requires a 78% reduction in UK territorial emissions between 1990 and 2035. In effect, it brings forward the UK's previous 80% target by nearly 15 years. There is no clearer indication of the increased ambition implied by the Net Zero target than this."

In establishing intermediary targets towards net zero, the context exists for Local Authorities to recognise the action that must be taken sooner rather than later. As concluded in the Sixth Carbon Budget:

"The implication of this path is clear: the utmost focus is required from government over the next ten years. If policy is not scaled up across every sector; if business is not encouraged to invest; if the people of the UK are not engaged in this challenge – the UK will not deliver Net Zero by 2050."

5.1.8 *National Audit Office – Achieving Net Zero*

Published on 2 December 2020, the National Audit Office report[24] to the UK Government examines the main risks to achieving net zero effectively and efficiently. The report is forthright that most of the UK reductions in emissions has come about from the switch away from coal in electricity generation. Whilst reducing emissions further will require wider changes to the UK economy, further investment in renewable electricity generation will be required.

BEIS (The Department for Business, Energy and Industrial Strategy) projects that the UK will not meet its targets for emissions reduction unless action is taken to reduce the shortfall in achieving the targets set in the fourth and fifth carbon budgets. At paragraph 6 of the summary the report states that:

"Achieving net zero is a colossal challenge and significantly more challenging than the Government's previous target to reduce emissions by 80% by 2050."

At paragraph 13 of the Summary, the report confirms that BEIS will launch a net zero strategy prior to COP26 in November 2021. The strategy will set out the government's vision for transitioning to a net zero economy by 2050, encompassing all sectors that need to decarbonise, and closing the gap that currently exists in meeting the targets in the fourth and fifth carbon budgets. The strategy will set the level for the sixth carbon budget, review the cost of net zero and how it should be paid for and establishing meeting net zero as part of the wider economic response to Covid-19.

5.1.9 *HM Government Energy White Paper – Powering our Net Zero Future December 2020*

On 14 December 2020, Alok Sharma MO, then Secretary of State for Business, Energy and Industrial Strategy announced the launch of the Energy White Paper[25]. The White Paper

[23] The CCC (2020) *The Sixth Carbon Budget: The UK's path to Net Zero* [Online] Available at: https://www.theccc.org.uk/wp-content/uploads/2020/12/The-Sixth-Carbon-Budget-The-UKs-path-to-Net-Zero.pdf (Accessed 17/09/2021)

[24] National Audit Office (2020) *Achieving Net Zero* [Online] Available at: https://www.nao.org.uk/wp-content/uploads/2020/12/Achieving-net-zero.pdf (Accessed 17/09/2021)

[25] HM Government (2020) *Energy White Paper – Powering our Net Zero Future* [Online] Available at: https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/943807/201214_BEIS_EWP_Command_Paper_LR.pdf (Accessed 17/09/2021)

set out the UK Governments strategy to put net zero into practice and for fighting climate change, following the Prime Ministers Ten Point Plan for a Green Industrial Revolution[26].

The White Paper reiterates the compelling case to urgently address climate change and avert the dangerous consequences of that will arise if global temperatures increase is not kept at well below 2% as per the Paris Agreement, if possible, not above 1.5%. The White Paper sets out the measures that need to be put in place to achieve the carbon emission targets for the UK. These entail a major shift in energy use from fossil fuels to electricity and hydrogen. Clean electricity is to become the predominant form of energy, with a consequent doubling of demand. This transition must be secured whilst retaining reliability, resilience and affordability. Delivering this will require billions of pounds of investment in clean energy infrastructure.

5.1.10 *Overall Climate Change and Energy Policy Conclusion*

Given the overview of the relevant international policy on climate change and renewable energy, and the context of continued need for renewable energy development, it is clear that projects such as the Development would be encouraged due to their environmental, social and economic benefits.

If consented, the Development would work to maximise the potential of renewable energy generation developments and contribute to meeting the CO_2 emissions reduction targets.

The recently published Energy White Paper is both a stark reminder of the urgency with which climate change must be addressed at UK, European and International levels, but also the economic benefits which can flow from the transition to a low carbon economy. The events and outcomes prior to and as a result of the COP26 conference further expedite the need to address climate change and carbon emissions. The proposed Development is fully in accord with these objectives.

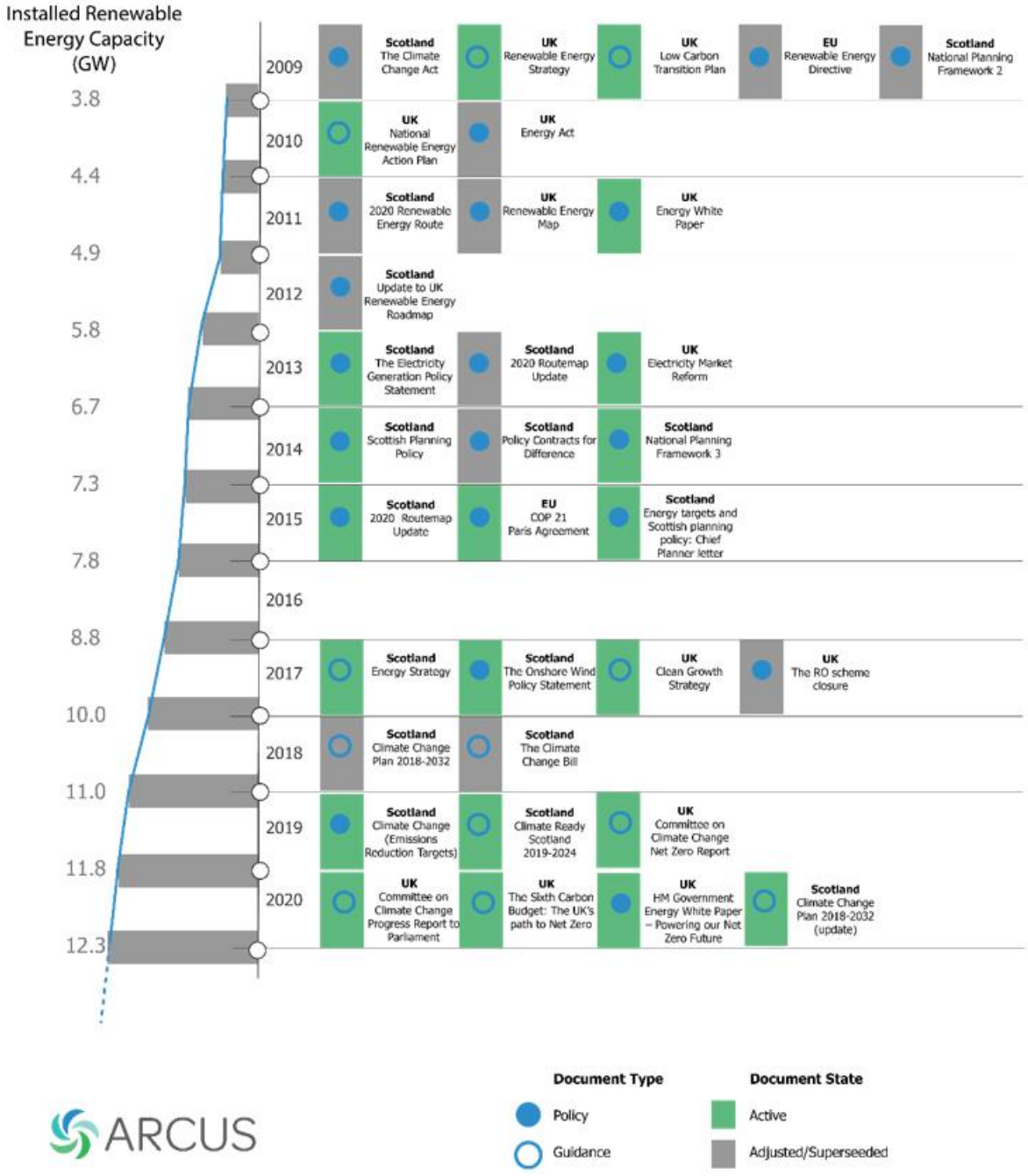
5.2 Scottish Climate Change and Energy Policy

Scotland is in a position of national climate emergency and action is required to combat the situation and achieve the target of net zero carbon emissions by 2045. There is a direct need to consent viable renewable energy developments in order to reach this goal.

The following Figure 5.1 shows the main legislative and policy developments between 2009 and at Scotland, UK and EU level and also the growth in Scotland's renewable energy capacity. As this capacity grows, so does the requirement for facilities to balance and support the grid.

[26] *Prime Minister Boris Johnson outlines his Ten Point Plan for a Green Industrial Revolution for 250,000 jobs*.18 November 2018 [Online] Available at https://www.gov.uk/government/news/pm-outlines-his-ten-point-plan-for-a-green-industrial-revolution-for-250000-jobs (Accessed 17/09/2021)

Figure 5.1: Main Legislative and Policy Developments



The following documents set out the Scottish Government's commitment to cut carbon emissions through the deployment of renewable energy, and sets out the national energy strategy alongside with energy planning statistics.

As noted in Section 1.3 of this Statement, the need to balance the grid and increase the reliability of weather dependant energy sources is imperative to the successful transition towards carbon net-zero objectives.

5.2.1 *Routemap for Renewable Energy in Scotland*

Securing low carbon energy supplies is a key element in achieving the target of reducing emissions by 80% by 2050 with an interim milestone of 42% by 2020. In recognition of this the Scottish Government set targets which include producing 100% of the country's demand for electricity from renewable sources by 2020, first detailed within the 2020

Routemap for Renewable Energy in Scotland[27]. Although now superseded, the Development therefore draws significant support as a contributor to these and successive targets.

5.2.2 *Scottish Energy Strategy*

The Scottish Energy Strategy 2017: The Future of Energy in Scotland[28] sets out the Scottish Government's vision for the future energy system in Scotland, to 2050. It articulates the priorities for an integrated system-wide approach that considers both the use and supply of energy for heat, power and transport. The Energy Strategy is designed to strengthen the development of local energy, protect and empower consumers, and support Scotland's climate change ambitions while tackling poor energy provision.

In March 2021, the Scottish Government published 'Scotland's Energy Strategy Position Statement'[29] (2021 SES) which builds on the 2017 SES. The 2021 SES notes an objective to:

"Introduce a new framework of support for energy technology innovation, delivering a step change in emerging technologies funding to support the innovation and commercialisation of renewable energy generation, storage and supply"

5.2.3 *Low Carbon Scotland: Climate Change Plan – Third Report on Proposals and Policies 2018-2032*[30]

This document was published in September 2018 and provides an overview of the Scottish Government's Climate Change Plan 2018-2032. The document contains what at the time were the most up-to-date renewable electricity generation data available from Digest of UK Energy Statistics (DUKES). In the summary document[31], progress so far is addressed in the following terms:

"In 2015, Scotland had reduced its emission by 41% from the 1990 baseline, and in 2017 Scotland generated 68.1% of its electricity requirements from renewables. Scotland's success in decarbonising electricity paves the way for transformational change across all sectors of the economy and society, particularly as electricity will be increasingly important as a power source for heat and transport."

The plan envisages that by 2032 Scotland will have reduced its emissions by 66% relative to the baseline, while growing the economy, increasing the wellbeing of the people of Scotland, and protecting and enhancing the natural environment. Further, the plan proposes that by 2032 Scotland's electricity system will be largely decarbonised and increasingly important as a power source for heat and transport.

The Development is in keeping with the Climate Change Plan, as it will contribute to the reduction of CO_2 emissions, and have positive effect on the local and national economy, whilst leaving a minimal footprint on the environment.

[27] Scottish Government (2011) *2020 Routemap for Renewable Energy in Scotland – Update* [Online] Available at: http://www.gov.scot/Resource/0048/00485407.pdf (Accessed 17/09/2021)
[28] Scottish Government (2017) *Scottish Energy Strategy* [Online] Available at: https://www.gov.scot/energystrategy (Accessed 17/09/2021)
[29] Scottish Government (2021) *Scotland's Energy Strategy Position Statement* [Online] Available at: https://www.gov.scot/publications/scotlands-energy-strategy-position-statement/ (Accessed 17/09/2021)
[30] Scottish Government (2018) *Climate Change Plan: Third Report on Proposals and Policies 2018-2032* [Online] Available at: https://www.gov.scot/publications/scottish-governments-climate-change-plan-third-report-proposals-policies-2018/ (Accessed 17/09/2021)
[31] Scottish Government (2018) *Climate Change Plan: Third Report on Proposals and Policies 2018-2032 (RPP3) - Summary* [Online] Available at: https://www.gov.scot/publications/scottish-governments-climate-change-plan-third-report-proposals-policies-2018-9781788516488/ (Accessed 17/09/2021)

5.2.4 *A Fairer, Greener Scotland: Programme for Government 2021-2022*[32]

In light of the climate emergency, announced in April 2019, Scotland has already committed to some of the toughest statutory emissions reductions in the world. Adopting a net zero emissions target by 2045 underlines the ambition that Scotland will no longer contribute to global climate change.

The 2021-22 Programme for Government maintains the national focus on the transition to net zero and the opportunity it creates. Even in the unusual circumstances of the COVID-19 pandemic, the 2021-22 Programme contains robust recommendations relating to achieving net zero and reducing CO_2 emissions including actively exploring *"opportunities for developing new and emerging net zero technologies and sectors"*.

5.2.5 *Reducing emissions in Scotland – 2020 Progress Report to Parliament*[33]

The Climate Change Committees 9th annual progress Report to the Scottish Parliament advises that Scotland's greenhouse gas emissions fell by 31% from 2008 to 2018. This was primarily due to action to reduce emissions in the power sector, where Scottish renewable electricity generation has tripled and fossil-fuelled generation has fallen by more than 70% in the last decade. However, greenhouse gas emissions increased by 2% in 2018, compared to a reduction of 3% in 2017.

The report identifies a number of clear priorities for the Scottish Government. Central to these are producing a new Climate Change Plan before the year end, creating the pathway to deliver Net Zero by 2045, and putting in place a UK Emissions Trading system. Amongst the more detailed recommendations is that the next National Planning Framework should be aligned closely with achieving Net Zero 2045 – providing a favourable planning framework to provide a low carbon and efficient energy system and climate resilient infrastructure.

5.2.6 *Update to the Climate Change Plan 2018 – 2032 – Securing a Green Recovery on a Path to Net Zero*

On 16th December 2020 the Scottish Government published a draft update to the 2018 Climate Change Plan[34]. The plan sets out the approach to delivering a green recovery, and a pathway to meeting world leading climate change targets for the period to 2032. By then, amongst other things Scotland's electricity system will be transformed, with over 100% of electricity demand being met from renewable sources.

There will have been a substantial increase in renewable generation, particularly through offshore and onshore wind capacity. As these are weather dependent energy sources, ensuring that the infrastructure is in place to store and distribute energy at a balanced rate and as is necessary, should be a priority.

Planning is a key delivery mechanism for many of the policies within the Climate Change Plan update, across all sectors. By making the right choices about where and what development should take place in the future, planning can help to reduce emissions whilst improving the wellbeing of communities and the quality and resilience of places across Scotland. Draft National Planning Framework 4 (NPF4) will be laid before Parliament in

[32] Scottish Government (2021) *A Fairer, Greener Scotland: Programme for Government 2021-2022* [Online] Available at: https://www.gov.scot/publications/fairer-greener-scotland-programme-government-2021-22/documents/ (Accessed 17/09/2021)

[33] Committee on Climate Change (2020) *Reducing emissions in Scotland Progress Report to Parliament* [Online] Available at: https://www.theccc.org.uk/publication/reducing-emissions-in-scotland-2020-progress-report-to-parliament/ (Accessed 17/09/2021)

[34] Scottish Government (2020) Securing a green recovery on a path to net zero: climate change plan 2018–2032 – update [Online] Available at: https://www.gov.scot/publications/securing-green-recovery-path-net-zero-update-climate-change-plan-20182032/ (Accessed 17/09/2021)

September 2021 with addressing climate change as a guiding principle for all plans and decisions.

5.2.7 *Scottish Climate Change and Energy Policy Conclusion*

Overall, the Development draws significant support from the national policy on energy and climate change. It has been designed in a way to minimise environmental effects whilst maintaining economic viability.

The Application has to be viewed in the context of national climate emergency and net-zero emissions targets. The Development serves a necessary purpose to maximise the capabilities of existing and forthcoming infrastructure in the transition to a more renewable energy supply.

As such, the Development accords with the national policy objectives for clean energy and climate change.

6 PLANNING POLICY

6.1 National Planning Framework 3 (NPF3)

On the 23rd of June 2014, the National Planning Framework 3 (NPF3)[35] was laid in the Scottish Parliament as required by statute alongside associated documentation. It is the Scottish Government's third NPF and spatial expression of the Government's Economic Strategy.

NPF3 sets the context for development planning in Scotland and a framework for the spatial development of Scotland as a whole. It outlines the Scottish Government's development priorities over the next 20-30 years and focuses on supporting sustainable economic growth and the transition to a low carbon economy. Together NPF3 and the Scottish Planning Policy (SPP) applied at the national, strategic and local level, will help the planning system to deliver the vision and outcomes for Scotland for sustainable and low carbon economy. NPF3 reiterates the ambition to achieve at least an 80% reduction in greenhouse gas emissions by 2050, where planning plays a key role in delivery of this target.

Although NPF3 does not specifically address Greener Grid Parks, the Scottish Government *"aims to ensure that all parts of Scotland make best use of their assets to build a sustainable future",* as stated in paragraph 2.6, while paragraph 2.7 supports *"emerging technologies for renewable energy"*. NPF3 establishes Scotland as a leader for renewable energy development and advises that onshore wind will continue to make a significant contribution to the diversification of the energy mix.

It is important to recognise that energy management and storage plays an invaluable role in the success of renewable energy. Being able to store and distribute energy as efficiently as possible is a key component to the ongoing success of the renewable energy industry.

Greener Grid Parks support the flexible operation of decarbonisation through balancing electricity supply and demand disparities currently experienced by the National Grid. These are due to the existing and likely increased levels of renewable energy generation already approved within Scotland. This will build on the momentum generated by the extensive national and international energy, climate change and low carbon initiatives, as outlined in Section 6 of this Statement, and will benefit consumers, communities and businesses throughout the country.

6.2 Scottish Planning Policy (SPP)

SPP (2014, updated in 2020)[36] is a non-statutory statement of Scottish Government policy on how nationally important land use planning matters should be addressed across the country. SPP sets out the Scottish Government's policy on land use planning and therefore should be afforded significant weight in the determination process for planning applications; however, paragraph (iii) of SPP acknowledges that *"it is for the decision-maker to determine the appropriate weight in each case"*.

Outcome 2: a low carbon place states its aim as *"reducing our carbon emissions and adapting to climate change"*. As stated previously, the Development is designed to support the flexible operation of the National Grid and decarbonisation of electricity supply.

SPP states in paragraph 93 that the planning system should:

- Promote business and industrial development that increases economic activity while safeguarding and enhancing the natural and built environments as national assets;

[35] Scottish Government (2014) National Planning Framework 3 [Online] Available at: https://www.gov.scot/publications/national-planning-framework-3/ (Accessed 17/09/2021)

[36] Scottish Government (2020) Scottish Planning Policy [Online] Available at: https://www.gov.scot/publications/scottish-planning-policy/ (Accessed 17/09/2021)

- Allocate sites that meet the diverse needs of the different sectors and sizes of business which are important to the plan area in a way which is flexible enough to accommodate changing circumstances and allow the realisation of new opportunities; and
- Give due weight to net economic benefit of proposed development.

The Development will make use of an allocated site, diversify the local economy and safeguard the natural and built environment.

The Development is considered to be an intrinsic aspect of a successful, clean energy system. Being able to manage the supply and demand of energy output aids renewable energy developments which, by their nature, fluctuate. It will also have a positive effect on carbon savings and a significant positive effect when considered cumulatively with UK-wide renewable energy deployment.

SPP paragraph 154 states that the planning system should:

- *"Support the transformational change to a low carbon economy, consistent with national objections and targets including delivering 30% of overall energy demand from renewable sources by 2020, 11% of heat demand from renewable sources by 2020, and the equivalent of 100% of electricity demand from renewable sources by 2020."*

The Development is in line with the principles set out in Paragraph 154, as, while it will not contribute to energy generation, it will make a direct contribution to the renewable energy targets by improving energy efficiency and security of supply. As such it draws significant support from SPP.

6.3 The Development Plan

As stated within Section 37(2) of the Planning Act 1997, the Development Plan is the primary consideration when determining planning applications, and forms the basis for the assessment of the Development in this Statement.

The Highland Council is the local planning authority; therefore, the LDP comprises of the following:

- The Highland-wide Local Development Plan 2012 (the HwLDP)[37]; and
- The Caithness and Sutherland Local Development Plan 2018 (CaSPlan)[38].

In addition to the statutory development plans listed above, key Supplementary Guidance (SG) relevant to the Development include:

- Physical Constraints Supplementary Guidance[39]

6.3.1 *The Highland-wide Local Development Plan (2012)*

6.3.1.1 Introduction

The Planning Act states that decisions on planning applications must be made in accordance with the Development Plan, unless material considerations indicate otherwise.

[37] The Highland Council (2012) *The Highland-wide Local Development Plan* [Online] Available at: https://www.highland.gov.uk/info/178/local_and_statutory_development_plans/199/highland-wide_local_development_plan (Accessed 17/09/2021)
[38] The Highland Council (2018) *The Caithness and Sutherland Local Development Plan* [Online] Available at: https://www.highland.gov.uk/downloads/file/19712/casplan_adopted (Accessed 17/09/2021)
[39] The Highland Council (2013) *Physical Constraints Supplementary Guidance* [Online] Available at: https://www.highland.gov.uk/downloads/file/2899/physical_constraints_supplementary_guidance (Accessed 17/09/2021)

The HwLDP was adopted by the Council in April 2012 and represents the view of the Council, setting out the development that the Council wants to see over the next 20 years.

The policies assessed within this section reflect the guidance provided by the Council in regards to policies considered relevant to the Development within the pre-application advice provided.

It is considered that the most significant policy within the HwLDP for the determination of the Proposed Development, is Policy 67 - Renewable Energy Development; and an assessment of the Proposed Development's compliance with this Policy is of significant importance when determining this Application.

The following summary of HwLDP policies are considered to be of relevance to the Application, however complete policy wording is not necessarily included. Fully worded policies can be found in the HwLDP. The summary of the relevant policy aspects is followed by an assessment of the Development compliance with the requirements therein.

6.3.1.2 Policy 28 – Sustainable Design

Policy 28 states that the Council will support development proposals that promote and enhance social, economic and environmental wellbeing.

By contributing to reliability and flexibility of the supply of renewable energy in the Highlands and delivering economic and employment benefits that arise from the construction of sustainable energy infrastructure, the Development demonstrates the promotion of social, economic and environmental wellbeing and receives in-principle support from Policy 28 and the overall guiding vision of the HwLDP.

Beyond this, Policy 28 includes criteria against which the Development should be assessed. In determining compliance with Policy 28, each of these criteria are addressed in turn. It is noted that some criteria are not relevant due to the nature of the Development.

The Application is supported by a Transport Statement and Drainage Impact Assessment, demonstrating the acceptability and compatibility of the existing and proposed infrastructure.

As stated, due to the nature of the Development as electricity infrastructure on private land associated with an existing wind farm, matters of public access and sustainable travel are not relevant to the consideration of the proposal. Furthermore, the reuse of brownfield land and existing buildings is not of material consideration due to the locational requirements of the infrastructure.

The Development will be predominantly unmanned (other than routine maintenance) during operation and will not contribute any waste on Site. The Development will be supported by a Construction Management Plan, which it is anticipated to be finalised and approved via an appropriately worded planning condition.

Impact on residential amenity is considered in the accompanying Landscape and Visual Appraisal and Noise Impact Assessment, and is determined to be acceptable and not significant.

Impact upon archaeological and cultural heritage receptors is assessed in the accompanying Archaeological Impact Assessment as acceptable and not significant.

The Development is appropriately designed with security fencing, columns with motion sensor lighting and operational CCTV cameras.

This Application is accompanied by a Design and Access Statement and the placement of infrastructure and materials used is considered throughout. Whilst, the nature of the Development dictates that some component infrastructure be housed in containers, every measure has been taken throughout the design evolution of the Development to minimise

the impact upon local character and environment. This is reflected in the conclusions of the accompanying assessment, mentioned above.

The information provided above and in the supporting documentation accompanying the Application demonstrates the extensive consideration that has been given to the design of the Development. When taken in combination with the absence of significant environmental impacts associated with the Development and the overall, in-principle support for proposals that strengthen social and economic wellbeing, the Development fully accords with the relevant requirements of Policy 28.

6.3.1.3 Policy 30 – Physical Constraints

Policy 30 states that:

"Developers must consider whether their proposals would be located within areas of constraints as set out in Physical Constraints: Supplementary Guidance. The main principles of the guidance are:

- *To provide developers with up to date information regarding physical constraints to development in Highland; and*
- *To ensure proposed developments do not adversely affect human health and safety or pose a risk to safeguarded sites."*

Notable amongst the physical constraints listed in the Supplementary Guidance, of relevance to the Development, is the placement of component infrastructure within 1000m of a wind turbine, noting that:

"Proposed developments should take into consideration the potential impact that they may have on the operational efficiency of existing and proposed wind turbines."

The Application is for Greener Grid Park, which will be harmonious with the existing use of the wind farm development. As such, the potential impact of the Development is considered to be positive and therefore in-principle support is given to the nature and location of the Development under Policy 30.

Furthermore, by granting consent to the existing wind farm development, which has been successfully operated to date, there is evidence to establish that the Site, which falls within the red line planning boundary for the existing wind farm, is not physically constrained.

As such, the Development fully complies with and gains support from Policy 30.

6.3.1.4 Policy 31 – Developer Contributions

Under Policy 31, development proposals that create the need for new or improved public services, facilities or infrastructure will be required to make contributions.

Due to the nature of the Development as not generating permanent on-Site staffing, there is no anticipated strain on services and facilities in the area. The Applicant has assessed the road network capacity as acceptable to carry the required construction vehicles, as it has done for the existing wind farm.

As such, the Development complies with Policy 31, insofar as it will not generate any requirement for additional contributions. However, should the Council wish to discuss this further through the application process, the Applicant is agreeable to entering into these discussions.

6.3.1.5 Policy 36 – Development in the Wider Countryside

Under Policy 36 the extent to which the development proposal meets following criteria is used to determine whether it is an acceptable use in the wider countryside:

- *Are acceptable in terms of siting and design;*

- *Are sympathetic to existing patterns of development in the area;*
- *Are compatible with landscape character and capacity;*
- *Avoid incremental expansion of one particular development type within a landscape whose character relies on an intrinsic mix/distribution of a range of characteristics;*
- *Avoid, where possible, the loss of locally important croft land; and*
- *Would address drainage constraints and can be otherwise adequately serviced, particularly in terms of foul drainage, road access and water supply, without involving undue public expenditure or infrastructure that would be out of keeping with the rural character of the area.*

Policy 36 goes on to state that development proposals may be supported if they are judged to be not significantly detrimental under the terms of this policy.

Taking each of these criteria in turn, it is noted through compliance with Policy 30, that the Development is not physically constrained in terms of its locational siting. The accompanying suite of technical documents assess the impact of the Development as acceptable in line with the assessment required by the Council within its pre-application advice.

The Application is accompanied by a Design and Access Statement that demonstrates the design evolution of the Development and the placement of the infrastructure on site has been assessed as acceptable in terms of impact on a variety of factors, including landscape, noise and safety.

The low height of the component infrastructure and the planting of boundary screening is sympathetic to the existing development within the area. The Council's Landscape Capacity Studies apply specifically to the provision of wind turbines and would not apply to the Development; however, landscape receptors and impact have been assessed as acceptable and not significant in the accompanying Landscape and Visual Appraisal.

Due to the small-scale nature of the Development and the infrastructure being the first of its kind in the Highlands, there is perception of the proposal creating an expansion of any existing development type.

The Development would be within the existing boundary of the operational Baillie Wind Farm and would not represent the loss of important croft or agricultural land.

The accompanying Drainage Impact Assessment and Transport Statement conclude that the Development would be adequately addressed and serviced without undue public expenditure.

Overall, whilst the Development would place container units in the wider countryside, appropriate measures have been taken to mitigate any impact to an acceptable level. Furthermore, the Development is of a low-grade nature and is not serviced by daily vehicle generation once operational. The Development must further be viewed in the context of the benefits that it provides to the renewable energy industry and the transition away from fossil fuels.

As such, the Development accords with the requirements of Policy 36 and provides substantial benefits locally and nationally.

6.3.1.6 Policy 51 – Trees and Development

Policy 51 states that:

"The Council will support development which promotes significant protection to existing hedges, trees on and around development sites."

And:

"The Council will secure additional tree/hedge planting within a tree planting o landscape plan to compensate removal and to enhance the setting of any new development."

The Development would not result in the felling or removal of any trees on site and is supported by the provision of a landscape planting plan, demonstrating new boundary planting to screen the Development. Overall, this represents a positive measure of planting on the Site and should receive supportive consideration by the Council under Policy 51.

6.3.1.7 Policy 52 – Principle of Development in Woodland

Policy 52 requires the Applicant to demonstrate the need to develop on a wooded site. It is noted that no forestry or woodland is currently within the planning boundary for the Development and as such, the Development complies with Policy 52.

6.3.1.8 Policy 55 – Peat and Soils

Policy 55 states that:

"Development proposals should demonstrate how they have avoided unnecessary disturbance, degradation or erosion of peat and soils.

Unacceptable disturbance of peat will not be permitted unless it is shown that the adverse effects of such disturbance are clearly outweighed by social, environmental or economic benefits arising from the development proposal."

The Site does not fall within Class 1 or 2 areas of carbon rich soil, deep peat or priority peatland[40]. As such, the requirements of this policy should not carry determinative weight upon the Development and the Development complies in-principle with the requirements of Policy 55.

6.3.1.9 Policy 56 - Travel

Policy 56 requires that development proposals that involve travel generation must include sufficient information regarding transport implications.

As noted throughout the Application, the Development will be predominantly unmanned beyond the construction phase and is a small developable area of approximately 1.99 ha. As such, there are no perceived tangible travel generation implications beyond the construction phase of the Development.

However, the Council requested during the pre-application stage that the Application be supported by a Transport Statement, which is provided and demonstrates the traffic generation associated with construction and assesses the impact upon the roads network as acceptable and not significant.

6.3.1.10 Policy 57 – Natural, Built and Cultural Heritage.

Policy 57 states that:

"All development proposals will be assessed taking into account the level of importance and type of heritage feature, the form and scale of the development, and any impact on the feature and its setting."

Policy 57 contains criteria against which development proposals should be assessed regarding their impact upon feature of local/regional importance, national importance and international importance.

[40] Scottish Government (2021) *Scotland's Soils* [Online] Available at: https://map.environment.gov.scot/Soil_maps/ (Accessed 17/09/2021)

In determining the compliance with Policy 57, this Statement relies on the evidence contained within the accompanying Archaeological Appraisal and Preliminary Ecological Appraisal (PEA).

The context of the Development must be noted as relevant for the requisite assessment, insofar as the Site is relatively small with a developable area of approximately 1.99 ha and is within the land consented for the development of the existing wind farm. Development of single-story container units will have much less of a bearing upon the designation of heritage assets than the existing turbines.

Due to the small nature of the Development, no significant impacts upon designated sites are anticipated, and this is reflected in the determination by the Council that the Development would not require an Environmental Impact Assessment.

Based on the determinations contained within the accompanying PEA and Archaeological Appraisal that the impact of the Development upon designated heritage assets are not significant, the Development fully complies with the requirements of Policy 57.

6.3.1.11 Policy 58 – Protected Species

Policy 58 states that where there is good reason to believe that a protected species may be present on the site or affected by the development, a survey will be required to assess as much.

This Statement relies on the determinations and recommendations within the PEA to determine appropriate compliance with Policy 58. The PEA concludes that the habitats present on Site during the survey were limited to common and widespread heath, grassland and heath/grassland mosaic habitats, as well as areas of bare ground associated with the overhead line transmission tower. It is noted that although these habitats are broadly of low ecological value, they have potential to support ground nesting bird species and protected species. As such enhancement measures are recommended, alongside good practise control measures, within the PEA.

Based on the conclusion of the PEA and the recommendations contained therein, the Development complies with the requirements of Policy 58.

6.3.1.12 Policy 59 – Other Important Species

Policy 59 requires that development proposals not have unacceptable levels of adverse effect upon other important species.

As with Policy 58, this Statement relies on the conclusion of the PEA and the context of the nature and location of the Development in concluding that no such adverse impact would arise.

6.3.1.13 Policy 60 – Other Important Habitats and Article 10 Features

Policy 60 states that:

"The Council will seek to safeguard the integrity of features of the landscape which are of major importance because of their linear and continuous structure or combination as habitat 'stepping stones' for the movement of wild fauna and flora."

There are no features on Site that are considered to be important for habitat purposes, as reflected in the PEA. The Development includes the provision of boundary landscape planting for the purposes of screening and increasing biodiversity.

As such, it is considered that the Development fully accords with the requirements of Policy 60.

6.3.1.14 Policy 61 - Landscape

Policy 61 states that:

"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 will include consideration of the appropriate scale, form, pattern and construction materials, as well as the potential cumulative effect of developments where this may be an issue. The Council would wish to encourage those undertaking development to include measures to enhance the landscape characteristics of the area. This will apply particularly where the condition of the landscape characteristics has deteriorated to such an extent that there has been a loss of landscape quality or distinctive sense of place."

The Application is supported by a DAS that details the design evolution of the Development, reflecting the landscape character of the Site and its surroundings.

This Statement relies on the accompanying Landscape and Visual Appraisal ('LVA') to determine the overall impact associated with the Development on landscape receptors and characteristics.

The LVA states that the visual effects of the Development from the surrounding areas would be negligible to minor.

In determining predicted landscape effects, the LVA concludes:

> *"The Development is situated within the Farmed Lowland Plain LCT within an operational wind farm, and neighbouring pylons and overhead lines. As such the Development is well sited within the landscape, set with a backdrop of the rising topography to the north, tree cover to the west, south and east, which help 'absorb' the proposed Greener Grid Park within the landscape. The Development is located within an enclosed location, but within an open, working rural landscape."*

And:

> *"Therefore, it is considered that within the context of the operational Baillie Wind Farm, the characteristics of the undesignated farmland landscape, and medium to large scale of the receiving landscape, with a high capacity to accommodate a Greener Grid Park development, the landscape would have the capacity to accommodate the Development."*

It is clear from the determinations of the LVA that the Development would not cause any significant adverse landscape or visual impacts. Furthermore, it is evident that these determinations and the design, location and scale of the Development (as well as proposed mitigation) has taken account of the principles of Policy 61.

As noted in Policy 61, applicants are actively encouraged to undertake measures to enhance landscape characteristics. The Development is accompanied by the provision of a Landscape Planting Plan showing the proposed enhancement measures. There is an absence of planting mix on the Site at the moment and this would represent not only an enhancement from a biodiversity perspective, but increased landscape screening, as mitigation for visual impact.

Based on the determinations within the accompanying LVA and the enhancements within the Landscape Planting Plan, the Development fully accords with Policy 61.

6.3.1.15 Policy 63 – Water Environment

Policy 63 states that:

"The Council will support proposals for development that do not compromise the objectives of the Water Framework Directive (2000/60/EC), aimed at the protection and improvement of Scotland's water environment. In assessing proposals, the Council will take into account

the River Basin Management Plan for the Scotland River Basin District and associated Area Management Plans and supporting information on opportunities for improvement and constraints."

Policy 63 is supported by Figure 8 on page 117 of the HwLDP detailing the River Basin Management Plan areas.

The Development is low-grade infrastructure on a 1.99 hectare Site with no rivers or water bodies within the developable area. The Development does not discharge waste water or water pollution.

The Development is supported by a DIA and PEA, assessing the hydrological and ecological impacts of the Development as acceptable and not significant, when the appropriate mitigation is put in place. As such, the Development fully accords with the relevant requirements of Policy 63.

6.3.1.16 Policy 64 – Flood Risk

Policy 64 requires development proposals to avoid areas susceptible to flooding and promote sustainable flood management.

As per the SEPA Flood Maps[41], there is no designation of likely flood risk from rivers, surface water or coastal flooding within the Site. This, considered in combination with the determination contained within the accompanying DIA, determines that the Development would fully comply with Policy 64.

6.3.1.17 Policy 65 – Waste Water Treatment

Policy 65 states that:

"Connection to the public sewer as defined in the Sewerage (Scotland) Act 1968 is required for all new development proposals:

- *either in settlements identified in the plan with a population equivalent of more than 2000; or*
- *wherever single developments of 25 or more dwellings (or equivalent) are proposed.*

In all other cases a connection to the public sewer will be required, unless the applicant can demonstrate that:

- *the development is unable to connect to a public sewer for technical or economic reasons; and*
- *that the proposal is not likely to result in or add to significant environmental or health problems."*

The Development is not within a settlement and is not for the construction of dwellings. As such, would not meet either of the first two criteria.

The Development is a predominantly unmanned, small collection of industrial containers and associated electrical infrastructure. It will not generate waste water during operation and is not required to connect to the public sewer.

The Development has been assessed through the EIA Screening process and the accompanying technical documents as not likely to have any significant environmental impacts.

[41] SEPA (2021) *SEPA Flood Maps* [Online] Available at: https://scottishepa.maps.arcgis.com/apps/webappviewer/index.html?id=b3cfd390efa44e3b8a72a07cf5767663&showLayers=FloodMapsBasic_5265;FloodMapsBasic_5265_0;FloodMapsBasic_5265_1;FloodMapsBasic_5265_2;FloodMapsBasic_5265_3;FloodMapsBasic_5265_4;FloodMapsBasic_5265_5;FloodMapsBasic_5265_6;FloodMapsBasic_5265_7;FloodMapsBasic_5265_8;FloodMapsBasic_5265_9;FloodMapsBasic_5265_10;FloodMapsBasic_5265_11 (Accessed 17/09/2021)

As such, the Development complies with the requirements of Policy 65.

6.3.1.18 Policy 66 – Surface Water Drainage

Policy 66 states that all development proposals *"must be drained by Sustainable Drainage Systems (SuDS) designed in accordance with The SuDS Manual (CIRIA C697) and, where appropriate, the Sewers for Scotland Manual 2nd Edition".*

The Application is supported by a Drainage Impact Assessment, which demonstrates the design and location of the SuDS features for the Development.

This has been produced in line with all appropriate and up-to-date guidance and with pre-application correspondence with the Council.

As such, through the appropriate placement of SuDS provisions, the Development fully complies with Policy 66.

6.3.1.19 Policy 67 – Renewable Energy Development

Policy 67 states that:

"Renewable energy development proposals should be well related to the source of the primary renewable resources that are need for their operation. The Council will also consider:

- *The contribution of the proposed development towards meeting renewable energy generation targets; and*
- *Any positive or negative effects it is likely to have on the local and national economy;*

And will assess proposals against other policies of the development plan, the Highland Renewable Energy Strategy and Planning Guidelines and have regard to any other material considerations, including proposals able to demonstrate significant benefits including by making effective use of existing and proposed infrastructure or facilities.

Subject to balancing with these considerations and taking into account any mitigation measures to be included, the Council will support proposals where it is satisfied that they are located, sited and designed such that they will not be significantly detrimental overall, either individually or cumulatively with other developments, having regard in particular to any significant effects on the following:

- *Natural, built and cultural heritage features;*
- *Species and habitats;*
- *Visual impact and impact on the landscape character of the surrounding area (the design and location of the proposal should reflect the scale and character of the landscape and seek to minimise landscape and visual impact, subject to any other considerations);*
- *Amenity at sensitive locations, including residential properties, work places and recognised visitor sites (in or outwith a settlement boundary);*
- *The safety and amenity of any regularly occupied buildings and the ground that they occupy – having regard to visual intrusion or the likely effect of noise generation and, in the case of wind energy proposals, ice throw in winter conditions, shadow flicker or shadow throw;*
- *Ground water, surface water (including water supply), aquatic ecosystems and fisheries;*
- *The safe use of airport, defence and emergency service operations, including flight activity, navigation and surveillance systems and associated infrastructure, or on aircraft flight paths or MoD low-flying areas;*

- *Other communications installations or quality of radio or TV reception*
- *The amenity of users of any Core Path or other established public access for walking, cycling or horse riding;*
- *Tourism and recreation interests;*
- *Land and water based traffic and transport interests."*

Whilst the Development does not generate renewable energy, it serves an important function within the wider industry and should be considered with the same manner of in-principle support as developments for the generation of renewable electricity.

Fundamentally it is noted that the placement of the infrastructure adjacent to and on the land relating to the existing wind farm demonstrates that the Development is appropriately related to the existing resource required for it to serve its function.

The Development will provide additional employment during construction and GVA during operation, which is of material consideration in relation to the positive economic effects associated with the Development.

There is an in-principle support under Policy 67, subject to the Development's compliance with other relevant policies, which is demonstrated throughout this Statement, and ensuring that there are no significant detrimental effects on a variety of factors, listed above.

It is noted within the determined compliance with Policy 57, Policy 58, Policy 59 and Policy 60 and the accompanying PEA and Archaeological Appraisal, that the Development would not result in any significant adverse impacts upon natural, built or cultural heritage designations, receptors and settings nor on important species or habitats.

As noted in the determined compliance with Policy 61 and the accompanying Landscape and Visual Appraisal, the Development would not result in significant adverse impacts on the landscape or visual receptors, and is supported by the landscape screening and enhancement proposed in the accompanying Landscape Planting Plan.

The Site is not located on publicly accessible land and does not contain any Core Paths, recreation routes or tourism receptors within its boundary or surrounding area.

Many of the criteria for receptor factors on surrounding properties and interaction with flight paths, navigation, and communications relate to the development of larger wind turbines and are not applicable for low-grade development. However, the Development has been assessed for potential noise impact within the accompanying Noise Impact Assessment ('NIA'), which determines that noise generation will be at an acceptable and not significant level.

There are no aquatic ecosystems or water based traffic and transport within the Site or effected by the Development.

The Development has been assessed for its impact upon traffic and transport interests in the accompanying Transport Statement and it is considered that the effects are acceptable and not significant.

As such, the Development fully accords with all relevant criteria under Policy 67 and gains in-principle support within the HwLDP, given the nature of the Development.

6.3.1.20 Policy 69 – Electricity Transmission Infrastructure

Policy 69 states:

"Proposals for overground, underground or sub-sea electricity transmission infrastructure (including lines and cables, pylons/ poles and vaults, transformers, switches and other plant) will be considered having regard to their level of strategic significance in transmitting

electricity from areas of generation to areas of consumption. Subject to balancing with this consideration, and taking into account any proposed mitigation measures, the Council will support proposals which are assessed as not having an unacceptable significant impact on the environment, including natural, built and cultural heritage features."

The Development is of strategic significance as it provides stability and redistribution to an area with renewably generated electricity. The component infrastructure would optimise the distribution of the wind power generated in the surrounding area. By placing the Development on the land associated with Baillie Wind Farm which has an existing intermediate tower on a 275kV double circuit overhead line, the efficiency of the project can be optimised. In addition, there is no need for lengthy transmission cables and therefore minimal environmental impact, demonstrating a locational benefit to consenting the Development, in addition to its role in the required transition away from fossil fuels.

The Development has been screened as unlikely to have significant environmental effects due to its size and location. The Application is supported by landscape, archaeological and ecological assessments that further the conclusion that the Development would be acceptable and have no significant effects. As such, the Development fully accords with the requirements of Policy 69.

6.3.1.21 Policy 72 – Pollution

Policy 72 states that development proposals that may result in significant pollution such as noise, air, water and light will only be approved if a detailed assessment is provided including appropriate levels if mitigation, if necessary.

The operation of the Development will not produce any air or water pollution, due to the nature of the operations on Site.

The Development proposes the provision of security columns with motion sensor lights and CCTV cameras. This is included for health and safety and security purposes. The Applicant is happy to enter into discussions regarding any specifics about the lighting of these columns (i.e., time of operation and direction of columns) to ensure that they do not cause undue impact. It is considered that this can be discussed and enforced via an appropriately-worded planning condition, if required.

The Application is supported by a NIA, the locations considered within which were chosen through discussions with the Council's Environmental Health Department.

This Statement relies on the conclusions within the accompanying NIA to determine the significance of the noise impact associated within the Development, and therefore, the overall compliance with Policy 72. The NIA includes mitigation measures and determines the acceptability of the Development after the inclusion of this mitigations, concluding:

"An assessment of noise impact has been undertaken in accordance with BS 4142. It has been found that, subject to the implementation of the mitigation specified in Section 7.3, Rating levels do not exceed more than 5 dB above the background sound levels during the day at the nearest receptors.

As stated in BS 4142, given the very low background levels during night-time, an NR assessment to absolute internal levels was undertaken. The assessment shows all receptors to meet NR 30 and NR20 during daytime and night-time respectively.

As such, the Development meets the applicable criteria and is considered acceptable in terms of noise."

The evidence provided in the NIA demonstrates that the level of impact associated with the Development, from a noise perspective, is acceptable. As such, the Development accords with the requirements of Policy 72.

6.3.1.22 Policy 77 – Public Access

Policy 77 states that:

"Where a proposal affects a route included in a Core Paths Plan or an access point to water, or significantly affects wider access right, then The Council will require it to either:

- *Retain the existing path or water access point while maintaining or enhancing its amenity value; or*
- *Ensure alternative access provision that is no less attractive, is safe and convenient for public use, and does not damage or disturb species or habitats."*

Firstly, it is again noted that for reasons of public health and safety access, public access on to the site will not be provided. The placement of electrical infrastructure prevents the safe passage of non-working people from accessing the Site.

The Site is contained within the land for the consented and operational Baillie Wind Farm and no Core Paths cross either the Site or the wider wind farm[42], and no impact upon access to any Core Paths within the Highland Council area would arise as a result of the Development.

Hydrology and drainage impacts have been assessed in the accompanying DIA and are concluded to be acceptable and not significant.

As such, the Development fully accords with the requirements of Policy 77.

6.3.2 *The Caithness and Sutherland Local Development Plan*

Adopted in August 2018, CaSPlan has a vision for *"a strong, diverse and sustainable economy characterised as being an internationally renowned centre for renewable energy…"*.

Page 3 of CaSPlan contains the strategy map for the region and allocates the area within which the Site falls as an *"Area for Energy Business Expansion"*. Amongst other possible uses, CaSPlan recognises the potential of these areas for *"employment-generating uses to service the sector"* and *"a flexible approach to considering the needs of emergent sectors"*.

As noted throughout, the development of synchronous compensators and flywheel technology represents a pivotal advancement in the management and redistribution of renewable technologies. As such, the Development evidently fits within the strategic vision of CaSPlan for the placement of this infrastructure.

Whilst the policies contained within CaSplan are not as extensive or determinative, in relation to the Development, the overall vision and strategy emphasise the importance of renewable energy developments and display an in-principle support for the industry. Paragraph 53 on page 17 of CaSPlan states:

> *"Investment in renewable energy generation in North Highland is not only helping to meet Council and national climate change targets but it has also delivered economic benefits for the area."*

The Development represents advancements in renewable energy technology as well as supplying employment benefits throughout the construction phase and further economic benefits during operation.

[42] The Highland Council (2021) *Core Paths in Highland Council area* [Online] Available at: https://highland.maps.arcgis.com/apps/webappviewer/index.html?id=2fd3fc9c72d545f7bcf1b43bf5c8445f (Accessed 17/09/2021)

6.3.3 *Summary*

As demonstrated above, the Development complies with the following relevant HwLDP policies:

- Policy 28 – Sustainable Design;
- Policy 30 – Physical Constraints;
- Policy 31 – Developer Contributions;
- Policy 36 – Development in the Wider Countryside
- Policy 51 – Trees and Development;
- Policy 52 – Principle of Development in Woodland;
- Policy 55 – Peat and Soils;
- Policy 56 – Travel;
- Policy 57 – Natural, Built and Cultural Heritage;
- Policy 58 – Protected Species;
- Policy 59 – Other Important Species;
- Policy 60 – Other Important Habitats and Article 10 Features;
- Policy 61 – Landscape;
- Policy 63 – Water Environment;
- Policy 64 – Flood Risk;
- Policy 65 – Waste Water Treatment;
- Policy 66 – Surface Water Drainage;
- Policy 67 – Renewable Energy Development;
- Policy 69 – Electricity Transmission Infrastructure;
- Policy 72 – Pollution;
- Policy 77 – Public Access;

Due to the nature and location of the Development it also gains in-principle support under several HwLDP policies as well as the CaSPlan Strategy Map, due to its role within the renewable energy industry and decarbonisation objectives.

7 RELEVANT MATERIAL CONSIDERATIONS

The Planning Act states that a decision on a planning application must be made in accordance with the Development Plan unless material considerations indicate otherwise. This Section assesses the Development against material considerations.

7.1 Energy Storage and Management Drivers

There is a focus at International, European and national level on how the UK can deliver secure, clean and affordable electricity to consumers. The country is legally bound through the Climate Change (Scotland) Act (2009) to reduce carbon emissions and through Renewable Energy Directive 2009/28/EC to increase electricity consumption from renewable resources.

Developments to manage supply and demand of grid services will play an important role in achieving this. A report by the National Infrastructure Commission (2016)[43] estimates that smart power systems in the UK, which include energy storage and management *"could save consumers up to £8 billion a year by 2030, help the UK meet its 2050 carbon targets and secure the UK's energy supply for generations."*

The Development is designed to support the flexible operation of the National Grid and decarbonisation of electricity supply. The Development will import and export electricity however, will not generate any additional electricity nor have any on-site emissions of CO_2. As such, the Development will contribute to the legal obligations of the Climate Change Act 2008, as amended in 2019 to incorporate the 2050 Net Zero target.

As noted in Section 1.4 of this Report, there is an assessed need for the UK to contribute 15 and 30 GW of new storage by 2050.

7.2 Climate Emergency

The Highland Council declared a climate and ecological emergency in 2019. The Council has made a commitment to reduce carbon emissions and stop catastrophic climate change.

7.3 UK Renewable Energy Roadmap

The UK Renewable Energy Roadmap (2011)[44] ('the Roadmap') set out the UK Government's commitment to increasing the use of renewable energy up to 2020. The Roadmap identified the National Policy Statements as a potential means of improving the delivery of renewable energy development through their advice on need, mitigation and delivery in a sustainable manner.

The UK Renewable Energy Roadmap Update (2013)[45] ('the Roadmap Update') reports on the progress that has been made in the renewable energy sector since the publication of the Roadmap. The Roadmap Update re-iterates Central Government's commitment to renewable energy (Paragraph 1):

"The Government strongly supports renewable energy as part of a diverse, low carbon and secure energy mix. Alongside gas, low-carbon transport fuels, nuclear power and carbon capture and storage, renewable energy offers the UK a wide range of benefits from economic growth, energy security and climate change perspective."

[43] UK Government (2016) Smart Power: A National Infrastructure Commission Report [Online] Available at: https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/505218/IC_Energy_Report_web.pdf (Accessed 17/09/2021)

[44] Department of Energy and Climate Change (2011) *The UK Renewable Energy Roadmap* [Online] Available at: https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/48128/2167-uk-renewable-energy roadmap.pdf (Accessed 17/09/2021)

[45] Department for Energy and Climate Change (2013) *UK Renewable Energy Roadmap Update 2013* [Online] Available at: https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/255182/UK_Renewable_Energy_Roadmap_-_5_November_-_FINAL_DOCUMENT_FOR_PUBLICATIO___.pdf (Accessed 17/09/2021)

The Roadmap Update indicates that tools to help balance the supply and demand of electricity, including energy storage and management, are required to remove constraints on the level of renewable energy which the grid can support.

The Roadmap Update also recognises that a number of barriers continue to present challenges to delivery, including pre-consent delays.

7.4 Socio-Economic Benefit

The Development will result in at least 5 full time equivalent jobs during operation. The Development will result in economic opportunities for local and regional contractors both for construction activities themselves and throughout the supply chain. The investment in the Development has the potential to generate a range of economic opportunities for local businesses, most notably employment opportunities and local spending.

Construction contracts will be placed for services and materials and local sourcing will be preferred where possible, however this is subject to competitive tendering and constrained by the specialist nature of the equipment. If the Development is consented, the Applicant will include a local suppliers list to its website and would welcome local business to add themselves to this list.

During the operational phase much of the maintenance will be undertaken remotely, although specialist jobs will be retained for the maintenance of the Development and other similar plants.

7.5 Emerging Planning Policy

7.5.1 *NPF4*

The Scottish Government have started work to prepare NPF4, which will replace NPF3 and incorporate SPP. It is anticipated that NPF4 will be produced with a focus on green energy and will "*provide a spatial planning response to the Global climate emergency*"[46]. This is indicative of the growing national investment in renewable energy, which must filter through to local level and consent suitable and sustainable renewable energy developments such as this one.

The revised NPF4 will also allow for the national planning framework and policies to reflect the up-to-date renewable energy guidance and climate change targets.

7.6 Summary

The material considerations cited in Section 7 provide weight in favour of the Development. The effects from the Development are modest and are outweighed by the benefits of the Development, particularly the Development's contribution to providing energy management and grid flexibility services in the Highlands. The Development will support the flexible operation of the National Grid and decarbonisation of electricity supply and has many synergies with the existing Baillie Wind Farm currently in operation.

[46] The Scottish Government (2019) Planning and Architecture Blog: National Planning Framework 4 – The Essentials! [Online] Available at: https://blogs.gov.scot/planning-architecture/2019/10/08/national-planning-framework-4-the-essentials/ (Accessed 17/09/2021)

8 CONCLUSION

This statement has been prepared in order to accompany an application made under the Town and Country Planning (Scotland) Act 1997, as amended, for the development of the Baillie Greener Grid Park, located on land within Baillie Wind Farm, West of Thurso, Highlands.

In accordance with the Planning Act, the Development should be determined in accordance with the Development Plan unless material considerations indicate otherwise. This Statement demonstrates that the Development complies with the relevant policies of the HwLDP. There is clear in-principle support for both the nature and location of the Development within the adopted HwLDP. The location of the Development within the existing Baillie Wind Farm allows for a number of project synergies and will avoid any significant infrastructure works that could directly affect the surrounding the environment. The application is supported by a comprehensive and necessary suite of technical and environmental documents, demonstrating that there would be no unacceptable adverse impacts as a result of the Development.

The Application must also be considered in the wider context of energy requirements and decarbonisation objectives at a local, national and global level. The Development fits an agenda of addressing the climate emergency at all levels. Balancing the supply and demand of energy is valuable to ensuring the efficiency of the renewable energy industry.

The policy compliance and energy context must be regarded as comprehensive evidence in support of consenting the Proposed Development.

In summary, the key benefits of the Development are as follows:

- The Development complies with Development Plan and can draw support from material considerations;
- The Development is designed to support the flexible operation of the National Grid and decarbonisation of electricity supply in support of EU targets and national planning policy;
- The Development is located in close proximity to Bailie Wind Farm which will avoid the need for lengthy transmission cables, ensure efficient connection to the National Grid and minimising disturbance to the community;
- The technical information, provided in the appendices to this Statement, was done so with consultation with the Council;
- The Development Site is not sensitive in regards to environmental considerations such as; cultural heritage, noise, air, hydrology and flood risk and ecology;
- A palisade and electric security fence provides security for the Development;
- As a new, innovative technology, the Development will diversify the economic mix in the Highlands in line with the CaSPlan strategy;
- As the existing road network was capable of accommodating the larger infrastructure of the Baillie wind farm, it is anticipated that the Development construction traffic will not create any significant effects nor require major upgrades; and
- As agreed with the Council, appropriate environmental reports have been produced.

The Proposed Development complies with the HwLDP in its entirety and as the primary consideration in determination, it is respectfully requested that the Application is approved.