

Euchanhead Renewable Energy Development

Additional Environmental Information
Chapter 4: Renewable Energy and
Planning Policy

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Abbreviations

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| Additional Environmental Information | AEI |
| Conference of Parties | COP |
| Environmental Impact Assessment | EIA |
| National Planning Framework 4 | NPF4 |
| Onshore Wind Policy Statement 2022 | OWPS 22 |
| Section 36 (of the Electricity Act 1989) | S36 |

4. Renewable Energy and Planning Policy

4.1. Introduction

Chapter 4: Renewable Energy and Planning Policy, of the Environmental Impact Assessment (EIA) Report outlines the main policies of relevance to the determination of the application for Section 36 (S36) consent. It sets out a summary of the planning and regulatory context in relation to the key topics covered in the EIA Report, and also looks at the wider policy context in relation to climate change and renewable energy and other material considerations. The Chapter does not form a judgement on the proposed development's compliance with the policy framework at the time of submission, as this was addressed in the Planning Statement accompanying the application.

This Additional Environmental Information (AEI) Chapter sets out the key relevant changes to renewable energy and planning policy, since the 2020 Euchanhead Renewable Energy Development S36 application. All the information contained in **Chapter 4** of the EIA Report remains valid unless stated otherwise in this Additional Environmental Information (AEI) Chapter.

4.2. International and EU Context

Since the 2020 Euchanhead Renewable Energy Development S36 application, there have been a further four United Nations Climate Change 'Conference of Parties' (COP) which have taken place. A summary of some of these subsequent COP events and their outcomes are as follows.

4.2.1. COP26 Glasgow

COP26 was held in Glasgow in November 2021. There was worldwide consensus on the severity of the current climate emergency, in particular recognition of the loss and damage that the current impacts of climate change are already having. Following two weeks of intense talks, nearly 200 countries agreed to the Glasgow Climate Pact to continue to pursue efforts to limit global average temperature increases to 1.5°C in accordance with the Paris Agreement. All countries also agreed to speeding up the pace of climate action this decade and to revisit and strengthen their current emissions targets to 2030.

4.2.2. COP27 Sharm El Sheikh

COP27 was held in Sharm El Sheikh in November 2022. Some of the key takeaways from the event included a renewed commitment to the keep to the 1.5°C warming target stipulated in the Paris Climate Agreement, and also the establishment of a fund to provide support to vulnerable countries experiencing climate related disasters e.g. flooding, droughts etc.

4.2.3. COP28 Dubai

COP28 was held in Dubai at the end of 2023 and concluded with an agreement that signals the "*beginning of the end*" of the fossil fuel era. Agreement was reached on the world's first



“*global stocktake*” which recognises that science indicates that global greenhouse gas emissions need to be cut by 43% by 2030 (compared to 2019 levels) in order to limit global warming to 1.5°C. The “*global stocktake*” recognises that Parties are off track when it comes to meeting their Paris Agreement goals and calls on Parties to take actions towards achieving, at a global scale, a tripling of renewable energy capacity.

4.2.4. COP29 Baku

The most recent COP, COP29 took place in November 2024, in Baku, Azerbaijan. COP29 worked on enabling the pledges made during COP28 (including a tripling of global renewable energy capacity by 2030) through climate finance agreements.

4.3. UK Context

4.3.1. The Sixth Carbon Budget

In December 2020 the Committee on Climate Change published ‘The Sixth Carbon Budget’ report, describing what the potential path options to net zero by 2050 look like and detailing the steps that must be taken to achieve this.

A critical recommendation of the report is that the UK Government requires a reduction in UK territorial greenhouse gases of 78% by 2035, relative to 1990 levels. The report advises that this can be done through the following four steps:

- Take up of low carbon solutions;
- Expansion of low carbon energy supplies including onshore wind;
- Reducing demand for carbon intensive activities; and
- Land and greenhouse gas removals.

Page 23 of the report refers to the devolved nations and sets out that “*UK climate targets cannot be met without strong policy action across Scotland, Wales and Northern Ireland*”, recognising that although the main policy levers are held by the UK Government, Scotland can take action through complementary measures at the devolved level, including supporting policies such as “*planning and consenting*”.

4.3.2. British Energy Security Strategy (2022)

The British Energy Security Strategy policy paper was published in April 2022. The strategy identifies that if the UK is to reduce rapidly increasing energy bills and keep them down for the long term, a reduction in dependence on imported oil and gas is required, alongside sourcing more energy domestically.

Whilst primarily focusing on offshore wind rather than onshore wind, the strategy highlights that onshore wind is one of the cheapest forms of renewable power and advises that improvements will be made to associated UK infrastructure, in order to facilitate more onshore wind development. The strategy seeks to increase deployment of wind and solar energy and identifies that it expects the measures detailed in the strategy to result in an electricity generation mix that is 95% low carbon electricity by 2030.

4.3.3. Energy Act 2023

The Energy Act 2023 received Royal Assent on 26 October 2023. The 2023 Act, which was originally introduced as the Energy Security Bill in 2022, seeks to build on the commitment set out in the April 2022 British Energy Security Strategy to reduce the UK's dependence on fossil fuel markets, by improving domestic energy production and making the UK more self-sufficient with regards energy.

Following the introduction of the 2023 Act into law, the Energy Security Secretary Claire Coutinho commented that the *"Energy Act is the largest piece of energy legislation in a generation. It will boost investment in clean energy technologies and support thousands of skilled jobs across the country. It lays the foundations for greater UK energy independence, making us more secure against tyrants like Putin, and helps us to power Britain from Britain"*.

4.3.4. Climate Change Committee Progress Report to Parliament (2024)

The most recent Climate Change Committee's progress report to Parliament 'Progress in reducing emissions' was published in July 2024. As with previous reports, it restates the need for renewable energy and stronger actions on reducing emissions. The report advises that *"The UK has a successful track record of emissions reductions, having met all its targets so far. Territorial emissions have now fallen by over half. We should celebrate this, and the Committee applauds the efforts of successive governments to achieve it. However last year, despite some progress, the previous Government signalled a slowing of pace and reversed or delayed key policies. The new Government will have to act fast to hit the country's commitments."* The report goes on to state *"The cost of key low-carbon technologies is falling, creating an opportunity for the UK to boost investment, reclaim global climate leadership and enhance energy security by accelerating take-up. British-based renewable energy is the cheapest and fastest way to reduce vulnerability to volatile global fossil fuel markets. The faster we get off fossil fuels, the more secure we become."*

4.3.5. UK Government: Clean Power 2030 Action Plan (2024)

The Clean Power 2030 Action Plan was issued by the Department for Energy Security and Net Zero (DESNZ) in December 2024. It sets out that the UK needs to install *"clean sources of power at a pace never previously achieved"*, and that *"clean power by 2030 will herald a new era of clean energy independence and tackle three major challenges: the need for secure and affordable energy supply, the creation of essential new energy industries supported by skilled workers in their thousands, the need to reduce greenhouse gas emissions and limit our contribution to the damaging effects of climate change. Clean power by 2030 is a sprint towards these essential goals"*.

The 2030 Action Plan indicates that there should be 27-29 GW of onshore wind operational within the UK by 2030. At present, there is approximately 14.2 GW of installed onshore wind capacity in the UK.

4.4. Scotland Context

4.4.1. Climate Change Plan Update (2020)

In December 2020, the Scottish Government published its most recent Climate Change Plan. The Climate Change Plan Update responds to the declared climate emergency and



considers what policies and proposals are necessary to deliver against the new targets set under the Climate Change (Emissions Reduction Targets) (Scotland) Act 2019.

The Climate Change Plan Update states that it is essential that a recovery from the COVID-19 pandemic “*responds to the climate emergency*” and “*continues the rapid growth in renewables over the past 20 years, moving from a low to a zero-carbon electricity system*”.

Looking specifically at seeking to achieve Scotland’s emissions targets out to 2032, the Climate Change Plan Update states that there will need to be “*a substantial increase in renewable generation, particularly through new offshore and onshore wind capacity*.”. The Plan seeks to quantify this by identifying that it expects between 11 to 16 GW of new renewable capacity will need to be developed during this period.

4.4.2. Onshore Wind Policy Statement 2022

The Scottish Government’s ‘Onshore Wind Policy Statement 22’ (OWPS 22) was published in December 2022. The OWPS 22 focuses on the following areas:

- main ambitions and aspirations;
- delivering on their ambitions in Scotland;
- environmental considerations: how to achieve a good balance and maximise benefits;
- benefits to local communities and financial mechanisms;
- benefits to Scotland;
- aviation considerations;
- technical considerations; and
- energy systems and regulation.

The OWPS 22 has been published with a purpose of restating the importance of onshore wind as a tool to accelerate Scotland’s transition towards a net zero society. The OWPS 22 cites the Russian invasion of Ukraine, and subsequent global energy crisis as an additional reason for the further development of onshore wind in Scotland. The statement emphasises the importance of onshore wind in Scotland as a cheap and reliable source of zero carbon electricity. Within the statement, the Scottish Government commits to an overall ambition of 20GW of total installed onshore wind capacity by 2030 (which remains in place despite the Scottish Government abandoning, in April 2024, the target of a 75% reduction in greenhouse gas emissions by 2030, compared to 1990 levels), increasing the current installed capacity by 11.3GW. Referring to the projection that Scotland’s peak demand for electricity will at least double within the next two decades, the report states that “*This will require a substantial increase in installed capacity across all renewable technologies*.”.

The necessity for taller turbines has been reaffirmed in section 3.4.6 “*...What would previously have been considered ‘taller’ turbines are now more common and must continue to be deployed in appropriate locations...*” whilst in section 3.4.7 it reiterates why these turbines are a necessity “*Taller turbines have a higher installed capacity which results in the need for fewer turbines per site*.”.



The OWPS 22 clarifies the Scottish Government's position on the construction of new wind farms and their effect on the landscape further in section 3.6.2 *"The only areas where wind energy is not supported are National Parks and National Scenic Areas. Outside of these areas, the criteria for assessing proposals have been updated, including stronger weight being afforded to the contribution of the development to the climate emergency, as well as community benefits"* in accordance with NPF4.

The OWPS 22 promotes community benefits, and the Scottish Government continues to encourage community benefits from all renewable energy businesses, as outlined in section 4.2. Along with community benefits, the OWPS 22 advocates for an increase in shared ownership of renewables developments.

4.4.3. Onshore Wind Sector Deal 2023

On 21 September 2023, the Scottish Government published 'The Onshore Wind Sector Deal'. The document sets out the commitments from the Scottish Government and the onshore wind farm industry, in order to deliver 20GW of onshore wind energy by 2030. The Government and the onshore wind farm industry's commitments within the deal include:

- support the enhancement of current skills and training provisions through further higher education and training to focus on delivery of the needs of the wind industry;
- continue to collaborate with local communities, building on good practices to enhance its existing 'good neighbour' approach through engagement at all stages of the project's lifecycle and offering impactful community benefits and practical routes to shared ownership;
- new onshore wind projects will enhance biodiversity and optimise land use and environmental benefits;
- reduction in time taken to determine section 36 applications for onshore wind farm projects by increasing skills and resources by streamlining approaches to scoping EIA Reports;
- develop evidence to support a more strategic approach to delivering the investment in our electricity network and to inform a coordinated approach to the transportation of wind turbine components across Scotland's road network; and
- deliver cooperative coexistence between onshore wind deployment and safe aviation operations.

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

Scotland's emissions reduction targets have been amended, as set out in the Climate Change (Emissions Reduction Targets) (Scotland) Act 2024, which came into force on 23 November 2024. The 2024 Act amends the Climate Change (Scotland) Act 2009 and replaces the Climate Change (Emissions Reduction Targets) (Scotland) Act 2019. This is as a result of the Scottish Government accepting in April that the emissions goal set within the 2019 Act (a reduction in emissions of at least 75%, against baseline levels, by 2030) was *"out of reach"*. This 2024 Act replaces the system of annual and interim emissions reduction targets (75% reduction by 2030 and 90% by 2040), which are focussed on Scottish emissions



of greenhouse gases in a given year, with a new system of periodic carbon budgets that are focussed on emissions over a five year period.

The Scottish carbon budget target is a target for the aggregate emissions reduction over a number of years, not a target for a single year. As a result, the Scottish Government is required to set budgets for five-year periods, not including the final budget, which may be shorter. This is because the final budget will run until the net-zero emissions target year, which might be less than five years after the previous budget period. The Scottish Government are currently preparing the carbon budget which will establish target emissions for the next five years.

4.5. Development Plan

4.5.1. East Ayrshire Local Development Plan 2

The East Ayrshire Local Development Plan 2 was adopted by East Ayrshire Council on 08 April 2024.

Policy RE1: Renewable Energy is key policy with regards onshore wind projects, such as the proposed Development. Other relevant policies include:

- Policy DES1: Development and Design;
- Policy OS1: Green and Blue Infrastructure;
- Policy HE1: Listed Buildings;
- Policy HE2: Conservation Areas;
- Policy HES: Scheduled Monuments, Historic Battlefields and Other Archaeological and Historic Environments Assets;
- Policy HE4: Gardens and Designed Landscapes;
- Policy NE1: Protecting and Enhancing Landscape and Features;
- Policy NE4: Nature Crisis;
- Policy NE6: Vulnerable, Threatened and Protected Species;
- Policy NE8: Trees, Woodland, Forestry, and Hedgerows;
- Policy NE9: Woodland Creation;
- Policy NE11: Soils;
- Policy NE12: Water, Air, Light and Noise Pollution;
- Policy T4: Development and Protection of Core Paths and Other Routes; and
- Policy MIN7: Borrow Pits.

Supplementary Guidance of relevance to the proposed Development (that was not already in force when the Euchanhead Renewable Energy Development application was made in 2020) includes:

- Design Supplementary Guidance (2025);



- Dark Sky Park Lighting Supplementary Guidance (2024);
- Local Landscape Areas Supplementary Guidance (2024); and
- Listed Buildings and Conservation Areas Supplementary Guidance (2024).

4.5.2. National Planning Framework 4

Scotland's National Planning Framework 4 (NPF4) was approved in January 2023 and was formally adopted on 13 February 2023. The NPF4 sets out an overarching spatial strategy for Scotland until 2045. As expected, (following multiple rounds of consultation) the urgency of the need to tackle climate change and the fundamental role of the planning system in delivering the radical change required to tackle and adapt to climate change is a central focus for much of the NPF4. This is highlighted through the following text within NPF4: *"The world is facing unprecedented challenges. The global climate emergency means that we need to reduce greenhouse gas emissions and adapt to the future impacts of climate change."*

Considering Scotland as a whole, the NPF4 in section 3 of Annex B, states that *"A large and rapid increase in electricity generation from renewable sources will be essential for Scotland to meet its net zero emissions targets"*. Further to this, on the 'need' for strategic renewable electricity generation and transmission infrastructure, section 3 of Annex B notes *"Additional electricity generation from renewables and electricity transmission capacity of scale is fundamental to achieving a net zero economy and supports improved network resilience in rural and island areas"*.

Further to the above, 'National Developments' of which the proposed Development is classed, are prescribed as such by the Scottish Government under s3A(4)(b) of the Town and Country Planning (Scotland) Act 1997, and the Town and Country Planning (Hierarchy of Developments) (Scotland) Regulations 2009. The need case for 'National Developments' is therefore already established.

In terms of national planning policy, the main policies that are most relevant to the proposed Development are:

- Policy 1: Tackling the Climate and Nature Crisis;
- Policy 3: Biodiversity;
- Policy 5: Soils; and
- Policy 11: Energy.

Other policies of NPF4 that are of relevance include:

- Policy 2: Climate mitigation and adaptation;
- Policy 4: Natural Places;
- Policy 6: Forestry, woodland and trees;
- Policy 7: Historic assets and places;
- Policy 12: Zero Waste;
- Policy 13: Sustainable transport;



- Policy 14: Design, quality and place;
- Policy 18: Infrastructure First;
- Policy 19: Heating and cooling;
- Policy 20: Blue and green infrastructure;
- Policy 22: Flood risk and water management;
- Policy 23: Health and safety;
- Policy 25: Community wealth building;
- Policy 26: Business and industry;
- Policy 29: Rural development;
- Policy 30: Tourism; and
- Policy 33: Minerals.



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