**PROPOSED ABERDEENSHIRE LOCAL DEVELOPMENT PLAN 2020**

This document sets out Scottish Renewables’ response to the Proposed Aberdeenshire Local Development Plan (LDP) 2020 consultation.

General Observations

The Scottish Government commitment to a 75% cut in emissions by 2030 and net-zero by 2045 requires substantial changes to current planning policy. More radical planning policy options to allow a more positive and supportive approach to the wide-scale deployment of renewable energy technologies will be needed.

Scottish Renewables believes that the Proposed LDP should be amended to reflect the Scottish Government’s climate change commitments and support for the further development of renewable energy developments, particularly at the scale required to meet our energy and climate change targets.

Our members are concerned that much of the Proposed LDP is a ‘roll forward’ of many aspects of the currently adopted LDP, while key developments and policy ambitions that have been announced by the Scottish Government since the current LDP was adopted are not reflected in the Proposed LDP. The current Proposed LDP does not set the necessary context or policy ambition required to address climate change over the lifetime of the Plan. This comment applies across the entire Proposed LDP and further specific representations are submitted in relation to individual planning policies.

The Proposed LDP does not make any mention of the Scottish Government’s declared ‘climate emergency’, nor is there any mention of the Scottish Government’s net-zero greenhouse gas emissions target by 2045. These are significant statements and legally binding commitments from the Scottish Government that must be central to planning policy and therefore reflected in the Proposed Plan.

The Proposed LDP must reflect these national commitments and provide a supportive local policy context to help achieve these objectives. Section 13 describes climate change as ‘possibly the greatest challenge facing the world today,’ however it makes no reference to the wide range of climate change legislation, policy ambitions and documents that have been published which set out key measures required to address this challenge, as discussed below.

The Proposed LDP has been published within the context of a changing planning system in Scotland, notably the Planning (Scotland) Act 2019, which received Royal Assent in July 2019. In addition, the Climate Change (Emissions Reduction Targets) (Scotland) Act 2019 has been introduced, which amends the Climate Change (Scotland) Act 2009.

In addition, a series of important energy related documents have also been published in the interim period, including the National Infrastructure Assessment (NIA) from July 2018, the Intergovernmental Panel on Climate Change (IPCC) report from October 2018, the Committee on Climate Change (CCC) Net Zero report from May 2019 (which set the net zero recommendations) and the more recent June 2020 CCC Progress Report to Parliament.

The amended Climate Change (Scotland) Act 2009, makes provision for the further reduction of greenhouse gas emissions in Scotland, as follows:

* The establishment of 2045 as a target date for reaching net zero greenhouse gas emissions.
* An interim target of a 90% reduction in emissions (compared to 1990 levels) by 2040; and
* A further interim target of a 70% reduction in emissions (compared to 1990 levels) by 2030.

These targets represent the most stringent statutory, legally binding greenhouse gas reduction targets in the world and represent a significant step in the Scottish Government’s increasing efforts to tackle climate change.

Section 3ZA (1) of the 2019 Planning Act is also of relevance to the Proposed LDP. This states that ‘The purpose of planning is to manage the development and use of land in the long-term public interest’. Section 3ZA (2) clarifies that ‘anything which contributes to sustainable development… is to be considered as being in the long-term public interest’. Furthermore, in bringing about changes to the content of the new National Planning Framework (NPF4), Section 2(4) of the 2019 Planning Act identifies ‘outcomes’ for NPF4, one of which (e) is ‘meeting any targets relating to the reduction of emissions of greenhouse gases, within the meaning of the Climate Change (Scotland) Act 2009’.

The Scottish Government’s Programme for Scotland 2019-2020 ‘Protecting Scotland’s Future’ (the Programme) which was published in September 2019 is of relevance to the Proposed LDP, and reinforces the important role that the planning system has to play in delivering greenhouse gas targets. For example, in the Ministerial Foreword, the First Minister references the ‘climate emergency’ and notes that the Programme ‘raises our ambition in light of the emergency we face. We are leading the world in setting challenging targets, but we must also redouble our efforts to meet them’.

Chapter 1 of the Programme ‘Ending Scotland’s Contribution to Climate Change’ notes that ‘adopting a net zero emissions target by 2045 underlines our ambition that Scotland will no longer contribute to global climate change’. The Scottish Government clearly sees the planning system as playing a crucial role in responding to the climate emergency and the Programme notes on page 38 that one of the major commitments in the response to the climate emergency will be the introduction of the fourth National Planning Framework (NPF4) which ‘will help to radically accelerate reduction of emissions’. The Programme notes that the climate emergency necessitates a debate on ‘more radical planning policy options’ and that planning ‘is a vital tool in leveraging the changes we need to make to achieve our goals’.

It is clear therefore that at the heart of the changes to the Scottish planning system is a recognition of the vital role the planning system must play in tackling climate change and reducing greenhouse gases.

It is crucial, therefore, that the Proposed LDP reflect these clear policy objectives and national Government announcements in its overarching regional or local vision statements. Many of the planning policies that would be of relevance to considering future renewable energy proposals are in some case duplications of current LDP policies, which do not address the ‘climate emergency’ and do not therefore represent ‘radical policy options’.

Scottish Renewables would therefore like to see greater recognition given to these issues in the LDP. This view is supported by the very recent June 2020 CCC Progress Report to Parliament, which notes that ‘delivering net zero emissions by 2050 in the UK will require a strong policy framework at all levels of government’. It continues and notes that ‘the UK cannot achieve net zero in 2050 without strong policy from its devolved partners across key areas including planning, agriculture, land use, housing regulations and local government’ (underlining added).

Scottish Renewables considers that the Regional and Local Visions of the Proposed Plan should be amended to acknowledge the climate emergency and the net-zero targets and the important role than the Aberdeenshire LDP must play in delivering these targets.

Section 7 – ‘Shaping Development in the Countryside’, various policies and associated text

**Policy R1 ‘Special Rural Areas’ and Policy R2 ‘Development Proposals Elsewhere in the Countryside’**

Given the Scottish Government’s legislative commitment to delivering net-zero greenhouse gas emissions by 2045 and the declaration of the climate emergency, it is likely that further large scale renewable energy developments will come forward for consideration during the life of the new LDP. Many of these will be large scale developments and may involve a range of technologies ranging from onshore wind to solar and potentially large-scale battery storage.

These will likely be in countryside locations and it is important this is acknowledged in the Proposed Plan. As currently worded, neither Policy R1 or Policy R2 make any provision for the possible location of such developments in the countryside and special rural areas. It is therefore unclear how prospective future applications would be considered against these policies.

The absence of any acknowledgement in the Proposed LDP that a countryside location may be required for renewable energy developments differs from the current LDP. In the ‘Shaping Development in the Countryside’ section of the current LDP, there is an acknowledgement that a countryside location is required for some forms of development. While renewables are not specifically identified in Policy R1 of the adopted LDP, it does refer to ‘essential public infrastructure,’ which could encompass renewable and other forms of energy generation or distribution.

The draft wording of policies R1 and R2 is therefore more restrictive than the current LDP policies of the same name, as there is no recognition of the requirement for a countryside location in some instances for ‘essential public infrastructure’. It is important that these policies are amended to recognise the highly likely scenario that renewable energy proposals will come forward within these locations in future years and to recognise the relationship between these policies and the mainly renewable energy policies of the LDP (such as Policy C2).

Policies R1 and R2 should be amended such that within these areas renewable energy proposals are identified as potentially acceptable land uses, subject to compliance with other detailed policy requirements (including the main renewable energy policy of relevance). In the absence of such a change, there is the risk that all renewable energy proposals will conflict with the policy criteria of these two policies, potentially leading to unnecessary (and unintended) policy conflicts.

**Policy R3 ‘Minerals’**

Clarity should be provided that this policy is not applicable to the consideration of renewable energy proposals (principally onshore wind farms and associated borrow pits). The policy requirements are clearly drafted for the purposes of considering large scale stand-alone commercial mineral extraction sites, and it is therefore important that renewable energy developers are provided with the necessary clarity that these policy requirements do not apply in cases where a renewable energy proposal may comprise a small ancillary borrow pit for aggregate requirements. This is not to say that such issues should not be considered as part of a renewable energy application but they should be considered as part of a wider range of issues to be considered e.g. as set out in paragraph 169 of Scottish Planning Policy (SPP).

In Policy R3.2 the requirement for an environmental statement to show acceptable environmental impacts of the mineral development should be amended. It is not the role of the EIA process to show ‘acceptable environmental impacts’. The Environmental Statement (now Environmental Impact Assessment Report) may identify significant environmental effects. The acceptability of those effects is a matter for the decision maker to take in the wider planning balance, considering a wide range of material factors. A significant effect in EIA terms does not make a proposal unacceptable in land use or policy terms and this element of Policy R3.2 should be amended.

**Policy R4 ‘Hill Tracks’**

For the same reasons as discussed in relation to Policy R3 above, clarity should be provided that this policy is not applicable to the consideration of renewable energy proposals. Onshore wind farms can involve extensive networks of access tracks necessary to access wind turbines for construction and maintenance purposes. These tracks are an operational necessity and should be considered as part of a wider range of policy requirements e.g. as set out in paragraph 169 of SPP. It is important that developers are provided with a sufficient degree of clarity on which policies are relevant to which types of development to avoid unnecessary policy duplication and analysis in planning submissions.

Section 10 ‘Natural Heritage and Landscape’ - various policies and associated text

Policies should be amended to ensure they are consistent with one another. Some policies are discussed in terms of the ‘acceptability’ of environmental effects, whereas others do not. This introduces inconsistency across policies and sets a higher policy bar to address in terms of some receptors. This is a common theme throughout the proposed LDP, and Scottish Renewables would seek that this is addressed.

**Policy E1.6 ‘Protected Species’**

This policy states that ‘development must seek to avoid any detrimental impact on protected species’. Unlike policies E1.1 – E1.5, this policy does not introduce ‘acceptability’ which is an important caveat that should be introduced. All species, irrespective of importance or ‘at risk’ status, are protected by policy E1.6; therefore even a minor impact (and not significant in EIA terms) upon a protected species would result in a conflict with this policy as currently worded.

The introduction of ‘unacceptable’ into the policy would allow the decision maker to exercise a greater degree of judgement in applying this policy that is reflective of the differing scale of legislative protection given to protected species, as noted by paragraph 214 of SPP. It would also bring the wording of this policy into line with other policies in this Section of the Proposed LDP, such as E1.1.

The relationship between this policy (and other general policies) and the renewable energy policies needs to be consistent. For example, Policy C2.2 ‘Wind Energy’ states that the Council will approve wind farms where they ‘avoid unacceptable environmental effects’. There is therefore the potential for a scenario whereby effects upon protected species would not give rise to a conflict with Policy C2.2 but it would conflict with Policy E1.6 because of the absence of commentary relating to acceptability in the latter policy.

Policy E1.6 should be amended to refer to acceptability, to bring it in line with other policies in Section 10 and also policies such as C2.2.

Section 11 ‘The Historic Environment’ - various policies and associated text.

Policies should be amended to ensure consistency with SPP and to ensure there is no conflict across various HE policies.

**Policy HE1 ‘Protecting Listed Buildings, Scheduled Monuments and Archaeological Sites (including other historic buildings)**

Policy HE1 applies to various forms of the historic environment as noted above.

Policy HE1.1 introduces a very strict protection measure stating that the Council ‘will not allow development that would have a negative effect’ upon the identified heritage resources. There is no scenario under which Policy HE1.1 would permit the Council to approve a development that has a negative effect (no matter how minor in EIA terms) upon identified resources. This is inconsistent with some elements of SPP.

Firstly, Policy HE1.1 is considered to be inconsistent with SPP paragraph 145 which notes, in the case of Scheduled Monuments, that where there are ‘exceptional circumstances’ permission may be granted for development where it affects a Scheduled Monument or the integrity of its setting. As currently worded, Policy HE1.1 does not cater for such a scenario.

Secondly, the prohibition on any development that has a negative effect on a listed building is also considered to be inconsistent with SPP, paragraph 141. This part of SPP makes it clear that ‘special regard’ is to be had to the importance of preserving and enhancing a listed building and its setting in the decision-making process. There may be a scenario where, on balance, works to or in the vicinity of a listed building may have a negative effect upon the special character or setting, but these works are deemed acceptable e.g. to ensure the retention of the building itself or save it from demolition or to repair following damage. The planning balance may conclude that while having ‘special regard’ to the characteristics of the listed building, it is acceptable to allow the development to proceed. This could not happen under Policy HE1.1 as currently worded.

Policy HE1.1 should therefore be amended to introduce reference to ‘exceptional circumstances’ to bring it in line with SPP paragraph 145 and amended to ensure it is consistent with SPP as regards listed buildings.

Policy HE1.1 is not considered to be consistent with SPP, paragraph 145, as it relates to Scheduled Monuments for a second reason. SPP, paragraph 145, states that where there is the potential for ‘an adverse effect on a scheduled monument or on the integrity of its setting, permission should only be granted where there are exceptional circumstances’. The underlined section is important because, as currently drafted, policy HE1.1 states that the Council will not allow a development that has a negative effect upon the character, integrity or setting of a Scheduled Monument. This is again different from SPP.

‘Setting’ and ‘integrity of setting’ are two separate matters and it is important that policy HE1.1 is amended to recognise this and reflect SPP. With regards to Scheduled Monuments, SPP states that it is the ‘integrity of its setting’ that is important. It is therefore entirely possible that a development may have an adverse effect upon the setting of a Scheduled Monument, but this impact would not affect the ‘integrity of its setting’. In such a scenario, there would be not conflict with SPP, but there would be a conflict with policy HE1.1. Policy HE1.1 therefore needs to be changed to bring it into line with SPP on Scheduled Monuments.

One option would be to possibly delete Policy HE1.1 entirely. There are stand-alone policies that deal with the historic assets protected by this policy (such as HE1.3 and HE1.5 etc) and the need for a further general policy, broader in scope, such as HE1.1 is unclear. This is particularly so given the SPP inconsistencies discussed above and the inconsistencies between policy HE1.1 and other policies, see below. Another option would be to introduce the addition of ‘unacceptable’ in front of ‘negative impact’ as per proposed phrasing under HE1.1.

**Policies HE1.5 and 1.6 ‘Scheduled Monuments and Archaeological Sites’**

These policies relate directly to Scheduled Monuments. As such both it and Policy HE1.1 are therefore relevant to the assessment of applications affecting these assets. If the Council is to retain policy HE1.1, it is imperative that it and other policies dealing with specific named assets are consistent. The main issue with Policy HE1.5 is there is no reference to ‘integrity of setting’, and as such the draft policy is inconsistent with SPP. As noted above, ‘setting’ and ‘integrity of setting’ are two different matters and Policy HE1.5 does not recognise this difference. It simply states that development that impacts on the setting of Scheduled Monuments will only be allowed if there are imperative reasons of overriding public interest.

While there are inconsistencies with SPP, this policy is more closely aligned with SPP, in terms of Scheduled Monuments, than Policy HE1.1 because it notes circumstances where development may be permitted (despite an adverse impact upon a Scheduled Monument), ‘if there are imperative reasons of overriding public interest’. This language is different from SPP, paragraph 145, but it is more closely aligned with SPP paragraph 145 than policy HE1.1. It should be noted that the test included in SPP paragraph 145 is specifically a HRA test and shouldn’t be applied to culutural heritage. This therefore means that there is an inconsistency between policies HE1.1 and HE1.5. Any development that has a negative effect ‘on the character, integrity or setting’ of a Scheduled Monument is not to be permitted under the terms of policy HE1.1. However, the same development with the same range of potentially negative effects could be permitted under the terms of policy HE1.5 if ‘there are imperative reasons of overriding public interest’.

To ensure consistency across policies, both HE1.1 and HE1.5 need to be amended (or HE1.1 deleted entirely) and to also bring them into line with SPP. This would provide much need clarity for developers, the Council and other stakeholders about which policies apply, how they are to be applied and would avoid potential confusion in planning application submissions and/or at planning appeals.

Section 12 ‘Protecting Resources’

Amendments to various polices are considered necessary to ensure policies do not introduce unnecessarily high policy hurdles and there is consistency between policies.

Comments in respect of these policies should be read in conjunction with comments on Section 13 of the Proposed Plan, particularly comments on Policy C3 ‘Carbon Sinks and Stores’

**Policy PR1 ‘Protecting Important Resources’**

Policy PR1.1 states that the Council will not approve developments that have a negative effect on important environmental resources associated with air quality, the water environment, important mineral deposits, peat and carbon rich soils etc.

While Scottish Renewables recognises that these resources do merit protection through the planning system there is a concern that as currently worded this policy is not sufficiently flexible to permit developments where only a minor, and not significant, effect is identified.

While it is recognised that the second part of this policy identifies a scenario where developments may be permitted, the requirement to demonstrate that ‘there are no reasonable alternative sites’ is excessive and unwarranted.

In development management terms, the practical implications of this policy may be that the developer of a wind farm who prepares an EIA (which identifies a minor but not significant effect upon one of these resources) will either be refused planning permission or will have to demonstrate that there are no reasonable alternative sites. Negative environmental effects (whether significant in EIA terms or not) are not always unacceptable in policy terms and in fact it is most unusual for a large-scale EIA to identify no significant effects of some degree. The acceptability of these impacts is a matter for the planning authority to consider, balancing a range of other factors. This policy as currently worded takes away from the ability of the planning authority to balance a range of factors and sets a clear course for refusing permission, unless there are no reasonable alternative sites. This is considered unnecessary and could lead to over complicated and unnecessary planning submissions in some cases.

By comparison, it is noted that Policy PR1.2 ‘Air Quality’ does refer to new developments not having ‘significant adverse impacts’. It should be noted that ‘significant adverse impacts’ can still be deemed as acceptable as part of the EIA process. The reference to ‘significant’ here is notable because it is absent from Policy PR1.1, yet both do apply to air quality. It is unclear how the Council could apply these very different policy tests to the same development. Policy PR1.2 introduces a greater degree of latitude that is absent from PR1.1. Therefore, there is a conflict between these two policies that requires to be addressed.

There is a further issue with Policy PR1.1 relating to its inconsistency with Table 1 of SPP, particularly as it relates to peat and carbon rich soils. In Table 1 of SPP these resources are a Group 2 interest. SPP states that developers must demonstrate that any significant effects on the qualities of these areas can be ‘substantially overcome by siting, design or other mitigation’. SPP therefore recognises that, as regards wind farms, some negative effects may arise upon Group 2 interests, but the key test is whether these can be substantially overcome. This is a different test from the one set by Policy PR1.1 which requires developers to avoid any negative effects whatsoever or demonstrate that no alternative sites exist. Policy PR1.1 therefore sets a much higher test than SPP, as regards wind farm development – one that is not considered to be warranted.

It is recognised that Policy PR1.1 is not a renewables specific policy and for this reason it is important than any changes made to the policy recognise that the primary point of assessment is against the renewables/wind energy policy of the LDP.

Scottish Renewables therefore recommends that Policy PR1.1 is amended to firstly remove reference to the need to demonstrate that there are no alternative sites and also to make reference to the acceptability of impacts in the policy, e.g. ‘We will not approve developments that have an unacceptable significant effect upon important environmental resources.’

**Policy PR1.10 ‘Peat and carbon rich soils’**

We would argue that this policy seems unnecessary as it simply refers to Policy C3 and notes that these resources are protected under that policy. Policy PR1.10 fails to mention that these resources are also protected under Policy PR1.1, albeit the protection afforded to these resources under that policy is subject to the above comments and suggestions for change.

We would suggest policy PR1.10 should be deleted as it unnecessary and does not provide any basis for assessing applications.

Section 13 ‘Climate Change’

Suggested changes to various policies as noted below to ensure consistency with SPP, Scottish Government renewable targets and other policies of the Proposed Plan. These comments should be read in tandem with Scottish Renewable comments on other Sections of the Proposed Plan as they are interrelated.

**Policy C2 ‘Renewable Energy’**

As an overarching comment, Scottish Renewables welcomes the statement in Policy C2.1 that the Council will support further applications for renewable energy developments where these are appropriately located and sized. However, as noted in the general comments on the overall Plan strategy and vision, Scottish Renewables is disappointed to note that the Proposed Plan makes no reference to the climate emergency or the legally binding net-zero greenhouse gas emission reduction target by 2045. There is a concern therefore that the Proposed Plan renewable energy policies do not adequately reflect the nature of the climate emergency or the important role of the planning system in helping to achieve the net-zero target.

Section 13 of the Proposed LDP should be updated to reflect these key issues and, for the reasons noted below, individual policies should be amended accordingly too.

**Policy C2.2 ‘Wind Energy’**

This is the main policy against which wind energy proposals will be assessed and Scottish Renewables welcomes the statement in the policy that the Council ‘will approve’ further wind development in appropriate locations. Scottish Renewables does however have concerns with the detailed implementation of this policy, as follows.

Firstly, this policy does not contain a set of criteria against which the Council will assess wind farm applications. There is some uncertainty about which other Proposed LDP policies would be applicable to the assessment of a wind energy application and clarity is required in Policy C2.2, to ensure there is no dubiety on this issue. SPP, paragraph 169, provides a list of assessment criteria to assess renewable energy applications. Perhaps Policy C2.2 could cross refer to SPP or be amended to include a list of assessment criteria, noting where there is, or is not, cross reference with other Proposed PLDP policies (see comments on policies PR1.1, R3 and R4 as examples of where clarification is required).

Secondly, Scottish Renewables has significant concerns over the reference to the 2014 Strategic Landscape Capacity Assessment for Wind Energy in Policy C2.2 and its potential role in the assessment of future applications. Scottish Renewables have made representations regarding the unacceptability of the use of Landscape Capacity Studies as a development management tool as part of supplementary position statements to NPF4. Scottish Renewables disagrees with the comment in the policy that this document remains relevant, even for the larger turbines now proposed. This statement does not seem to take the legislative and regulatory changes which have occurred since 2014 (as detailed previously in the General Comments section) into account.

Scottish Renewables notes that the Executive Summary of the 2014 Capacity Study states that ‘the assessment has determined that there are no areas of Aberdeenshire suitable for extensive windfarms with large turbines’. Given that the Capacity Study defines large turbines as 80m+ and very large turbines as 125m+ (Section 6.2.1), this statement gives Scottish Renewables cause for concern if this document is to be used, in some capacity, to help inform decisions on future wind farm applications. We would argue that this document cannot provide a suitably positive framework to assess future applications, if it has already determined there is no scope for large turbines. If the Study concluded in early 2014 that there was no scope for further large scale turbines at that time, this document cannot be used to help support the delivery of new wind energy proposals, particularly given that it is increasingly common for applications to now comprise turbines with tip heights in excess of 150m to blade tip.

In addition, the Capacity Study was published in March 2014, prior to publication of SPP, prior to declaration of the climate emergency and prior to the net-zero target. Renewable energy and greenhouse gas reduction targets have changed substantially in the interim period, and there is now a demonstrably greater need for further renewable energy than there was at the time the Capacity Study was produced over 6 years ago. It is a document that must now be treated with some caution given the significant change in the energy policy landscape in the intervening period, the change in the cumulative situation (there have been 184 Wind turbines which are consented or have been built since 2014) and the change in turbine technology. The continued relevance of this document for the foreseeable future is therefore questionable.

In addition, it is noted that the Capacity Study does not form part of the Development Plan. By contrast, the spatial framework (page 86) does and this follows the Spatial Framework set out in Table 1 of SPP. Policy C2.2 should be amended to remove reference to the Capacity Assessment with greater emphasis given to the Spatial Framework.

Scottish Renewables notes that the Spatial Framework Map itself (page 86), identifies ‘areas with strategic capacity for wind turbine development’, as required by paragraph 162 of SPP. This has been previously raised by Scottish Renewables as part of a supplementary position statement on this topic as part of our response to NPF4 ‘Call for Ideas’ consultation. This Framework is identical to the Spatial Framework in the current LDP and clarity on the source of this strategic capacity would be useful. There is also uncertainty to what scale of development (tip heights for example) this strategic capacity refers – clarity on this would be useful.

The identification of large areas of strategic capacity for wind turbine development in the Spatial Framework Map, while welcome in principle, does highlight the problem of Policy C2.2 referring to the 2014 Capacity Study as a basis to assess wind energy applications. As noted above, that document states that there are ‘no areas of Aberdeenshire suitable for extensive windfarms with large turbines’. This statement conflicts with the identification of large areas of strategic capacity on the Spatial Framework Map and highlights the issues all stakeholders will face when trying to reconcile these very different stances on the capacity for future wind energy development in Aberdeenshire.

**Policy C2.3**

Scottish Renewables has no concerns with the first sentence of this policy but does question the necessity and appropriateness of the rest of the text to be embedded within a policy. This text, starting with the second sentence, feels more suited to introductory commentary at the outset of this Section, as it provides advice on issues such as repowering and lifetime extensions. What the policy does not do is set out the Council’s position on repowering and lifetime extensions. Given that these types of applications are likely to be increasingly common over the lifetime of the Proposed Plan, as well as physical extensions, Policy C2.3 should be amended to clearly set out the Council’s in principle support for such applications. This would be consistent with the Onshore Wind Policy Statement (2017) and would help ensure that the Proposed Plan creates a positive policy context to help address the climate emergency and net-zero target. It should be noted that lifetime extension may simply include an extension in operating time, without any changes to infrastructure. Scottish Renewables suggests that this wording is changed, and either simplified or this eventuality included.

With reference to the sentence ‘Existing bases should be reused’ Scottish Renewables suggests that this wording should be amended to include the wording ‘where possible’ after ‘reused’. It is unreasonable to stipulate this requirement as, if turbines are to be replaced, it will not be possible to reuse existing bases in most cases. Turbine foundations are usually specific to the turbine model.

**Policy C3 ‘Carbon Sinks and Stores’**

This policy states that the Council will protect carbon sinks and stores from disturbance or destruction. As noted in other representations, these resources also benefit from protection in Policies PR1.1 and PR1.10, albeit not consistently and not in accordance with SPP. As currently worded, the Policy is not consistent with SPP, which groups carbon rich soils as a Group 2 interest in terms of the SPP Spatial Framework. SPP states that any significant effects upon these interests should be substantially overcome. This is a different and less stringent test than that set by Policy C3, which simply notes that these resources will be protected from ‘disturbance or destruction’. Policies PR1.1, PR1.10 and C3 should reviewed and where necessary amended to bring them into line with SPP, as they relate to wind farm developments, as also to ensure they are consistent with each other.