Agenda Item	10
Report No	ECI/6/2022

HIGHLAND COUNCIL

Committee: **Economy and Infrastructure**

Date: **12 February 2022**

Report Title: **Onshore Wind Policy Statement Refresh 2021**

Report By: **Executive Chief Officer Infrastructure, Environment & Economy**

1. Purpose/Executive Summary

1.1 This report provides some background and introduction to the Scottish Government's Draft Onshore Wind Policy Statement Refresh, which was published in October 2021, and presents the headline issues and the Council's response to the consultation that closed on 31 January 2021.

2. Recommendations

2.1 Members are asked to homologate the response contained in **Appendix 1**.

3. Implications

3.1 **Resource** – The refreshed Policy Statement, if accepted, will have significant implications for resourcing the Council's response to meeting the Government's ambition set out within it for the remainder of this decade. This will be in relation to the direct response to planning for onshore wind, determining planning applications and/or responding to consultation requests from Government and defending the Council's position at Public Local Inquiry. This is currently met by existing resource that is already at capacity to deal with these complex issues.

3.2 **Legal** – The predicted increase in applications/consultation responses will result in increased risk of legal challenge and most likely an increase in the number and frequency of Public Local Inquiries.

3.3 **Community (Equality, Poverty, Rural and Island)** – There is a desire from Scottish Government for communities to continue to benefit from onshore wind proposals through community benefit payments and shared ownership.

3.4 **Climate Change / Carbon Clever –** The ambition set out within the Draft Statement would see the installed onshore wind capacity more than double by the end of this decade. This would make a significant contribution to meeting net zero by 2045 and assist with the next challenge that is the decarbonisation of heat, transport and industry.

3.5 **Risk** – No implications.

3.6 **Gaelic** – No implications.

4. Background and introduction

4.1 The Scottish Government's Onshore Wind Policy Statement was first published in December 2017. The purpose of this was to set out how onshore wind could be supported to achieve the Government's target for 100% of all Scotland's electricity demand to be generated from renewables by 2020 and help grow the industry to meet the greater challenge of decarbonising the heat and transport sectors into the future. In doing so the aim was to secure potential economic benefits for the country and at the same time ensure that communities impacted by development benefitted.

4.2 While supportive of increased deployment of larger turbines the Policy Statement also recognises the challenge in identifying landscapes with the capacity to accommodate them, supporting development in locations where it can best be accommodated. This reflects the Government's current planning policy position set out in Scottish Planning Policy (SPP) of achieving the right development in the right place.

4.3 During the consultation on the Policy Statement options for taking a more strategic approach to wind farm development were considered including the identification of new sites where the greatest capacity could be achieved within appropriate landscapes. This was not however taken forward with the preference of continuing with the status quo where developments are considered on their own merits as and when submitted.

4.4 The Policy Statement confirms the expectation that developers should offer community benefits in line with the Good Practice Principles for Community Benefits from Onshore Renewable Energy Developments (2014) with a commitment to that being reviewed. It also set an ambition for at least half of all newly consented renewable energy projects to have an element of shared ownership.

4.5 Scotland now has 8.4GW of installed onshore wind capacity. 97% of Scotland's electricity consumption is now produced from renewable sources; 71% of which is from onshore wind. Highland has made a significant contribution towards this, with 1.85GW installed capacity and a further 900MW either in construction or consented but not yet built, and as one of the windiest parts of the country it is no surprise that there is sustained interest in developing more. Nationally there is around a further 5GW consented and not yet built with a similar capacity in the planning process;1.1GW of which is in Highland alone.

4.6 The commitment to achieve net zero greenhouse gas emissions by 2045 enshrined within The Climate Change (Emissions Reduction Targets) (Scotland) Act 2019 has prompted the Government to review its Onshore Wind Policy Statement taking into account the extent of current deployment and in recognition of the challenge involved in moving forward with decarbonising the heat, transport and industry sectors.

5. Headline issues

5.1 This Policy Statement update is in many ways not significantly different to the current 2017 Statement. The update considers the financial mechanisms available to aid deployment, the barriers to deployment, the need to secure the economic benefits while also enabling community benefit payments and the growth in shared ownership.

5.2 The barriers to deployment specifically referenced are the Eskdalemuir Seismic Array, Aviation, Aviation Lighting, Transmission Charges, and Environmental factors including Noise, Land Use, Biodiversity as well as Landscape and Visual.

5.3 Notable differences are references to Scottish Government's recently published Local Energy Policy Statement which recognise the need to deliver more localised energy solutions and provide support for community led activity at this scale and the Hydrogen Policy Statement that sets the vision for Scotland to become a leading hydrogen nation. Allied to this the draft Statement considers the economic opportunities arising from onshore wind for Scotland's renewables supply chain that can further assist in the transition away from oil and gas.

5.4 The most significant difference in this draft Statement however is the stated ambition to significantly increase onshore wind capacity in Scotland with its consequential effects on the economy, land use, landscape and our communities.

Ambition

5.5 The headline issue is the ambition for Scotland to support an additional 8-12GW of onshore wind capacity. It is not entirely clear from the consultation document on what basis this figure has been calculated but it relates to the work of the Climate Change Committee (CCC), who act as advisor to the UK Government and devolved administrations. The CCC has developed four explanatory scenarios for emissions to 2050. These estimate that, in every scenario, the UK will require between 25-30GW of installed onshore wind capacity to meet government targets.

5.6 The UK currently has 14.1GW of installed capacity of which 8.4GW is already within Scotland. The recommendation of the CCC is to effectively double the current UK capacity with the stated ambition leading to a substantially greater increase in onshore wind deployment in Scotland than the rest of the UK. Of course, Scotland's wind resource is greater and more reliable than in other parts of the UK so this makes some sense, but it does beg the question as to where will it go?

5.7 While repowering and extending the life of schemes can help make development more viable or extend their life, they are not necessarily going to significantly increase capacity. It is therefore highly doubtful that the majority of this 'new' capacity would come from developments that we are already aware of. Given the contribution that Highland makes to the Scottish installed capacity (around ¼) it is anticipated that the Council will continue to come under pressure to accommodate yet more capacity.

Environment

5.8 The fact that Highland has 1.85GW of installed onshore wind and a further 900MW consented and/or in construction is testament to the work that this planning authority has done to ensure, by and large, that development can be accommodated without significant adverse impacts on our landscape, land use, protected habitats and our communities.

5.9 It is noted that the draft Statement dispenses with a requirement for development to be in the most suitable places or protect our landscapes (other than those most cherished) and instead identifies that the need for action on climate will change how Scotland looks. This is disappointing although not surprising in that it mirrors the position in National Planning Framework 4 (NPF4). While there may be scope for further limited development in Highland without substantial conflict, the concern is that much of the mitigation that we have already secured to protect our landscape and amenity already could be undone.

5.10 There is also a high likelihood that a substantial increase in onshore wind deployment will lead to conflict with other existing land uses and resource, such as farming, forestry and peatland. This might have a negative impact on our stored carbon but could also result in some positive benefits arising from peatland restoration, new woodland creation and enhanced biodiversity.

5.11 It is also likely that development will be located closer to our communities with inherent risk of additional visual and noise impacts.

Economy

5.12 On a positive note, there is potential for wider economic benefit. While the manufacturing of turbine components is well established outwith Scotland there may still be opportunities in retrofitting and/or new manufacturing if this can be linked to the offshore market. Highland does already have an established supply chain for onshore wind and an emerging one in respect of offshore wind and hydrogen. It also has some of the best suited ports to meet the needs of the renewables sector.

5.13 One of the biggest sectors in Highland is tourism. There have been a number of studies, surveys and reports produced over the years, commissioned for various purposes, in respect of the impact of wind farms on tourism but there is no single definitive, and importantly, impartial study that can be relied upon. The main impact of development on tourism relates to the landscape and visual amenity effects. Highland remains a popular tourist destination that does not appear to have been impacted significantly by our existing wind farm development but there may come a point where this balance will change.

Community Benefit/Ownership

5.14 The Scottish Government revised its Good Practice Principles for Community Benefits from Onshore Renewable Energy Developments in May 2019 and while the benchmark figure remains at £5000/MW per annum we are aware of benefit payment negotiation figures of around £3000/MW for some of the more recent schemes. However, it is clear that host communities are still benefitting. Communities impacted by the increased scale of transmission infrastructure do not benefit in the same way and it is considered that this is an area that Scottish Government may wish to consider further.

5.15 What has been less successful, particularly with larger schemes, has been the ambition for more shared ownership. While we are aware of developments that operate share schemes the opportunity of true community ownership is elusive and will largely be due to inherent risks. It is suggested that Scottish Government look at how they could support communities more in this regard.

5.16 The impact of high transmission charging is not only a barrier to the deployment of renewable energy schemes but does lead directly to higher bills for our community. While there is already a separate action to write to Ofgem in relation to the impact that transmission charges are having on consumers in Highland and to Scottish Government to ask that it lobby for fair tariffs for the Highlands it was included within the response to this consultation as it was also relevant.

6. Conclusion

6.1 There will continue to be pressure to develop onshore wind in Highland for the foreseeable future and at least the remainder of this decade until sufficient offshore wind capacity comes on stream. Inevitably this is likely to lead to conflict.

6.2 New development, while being appropriately designed and located, also needs to consider its role in supporting a distributed energy system and community aspiration, which may include employment, financial incentive and/or ownership, in order to be accepted. It would need to be seen as a direct benefit to its location. This suggests that there is a need for a plan led approach to future onshore wind, one that better reflects local circumstances albeit with an eye on national priorities. By doing so, the limited development opportunity that remains may be more likely to result in becoming installed capacity.

6.3 While the draft Statement hints at the need for some form of spatial plan – or sectoral plan – as has been advanced in the recent ScotWind offshore wind leasing exercise there is no detail on what that may look like. Again, while hinted, NPF4 does not explicitly refer to a spatial framework or provide an opportunity or procedure for preparing such a framework. This is considered a significant omission.

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Date:	20 January 2022
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Background Papers:	Consultative Draft Onshore Wind Policy Statement Refresh 2021 Scottish Government; October 2021

Appendix 1

Onshore Wind Policy Statement Refresh 2021: Consultative Draft
Response of The Highland Council - January 2022

	Chapter 1 – Current Position
1.	**Does this chapter provide a fair reflection of the current situation faced by Scotland's onshore wind industry?**
	The Council considers that this is a fair reflection of the current position in terms of legislative context and the deployment of onshore wind to date. The Highland Council area currently hosts an installed capacity of 1.85GW of onshore wind energy with another 200MW currently under construction and a further 700MW of generation consented but not yet built. There is around 1.1GW currently in the planning process. National Planning Framework 4 (NPF4) is now out to consultation. The intention is that NPF4 will become part of the Development Plan. Policy 2a states that when considering all development proposals "significant weight should be given to the Global Climate Emergency". The Council shares the commitment of the Scottish Government to addressing climate change and the parallel biodiversity crisis. However, it would seem that the justification for the proposed delivery target is less clear that it could be, and places Scotland with a substantially greater increase in onshore wind deployment than the rest of the UK. In part, of course, this can be explained by available wind resource however there must also be recognition of the need to balance the different interests of climate action, nature and economy with landscape, visual, residential and other environmental impacts in the planning of wind farm developments. In Highland, most wind energy development has, to date, been successfully integrated into the area. However, as the scale of development and the need for renewable energy development increases, this becomes more difficult to achieve. In short, the "easy" sites where there were little to no environmental constraints and which are well contained within the landform have been utilised. What is left are sites which present more technical challenges and are more difficult to accommodate without unacceptable effects. While the draft Statement continues to recognise this balance, there is less focus in this draft Statement on the need to protect our landscapes and we consider that this 'need to protect' should be strengthened within the final document. While the intention of NPF4 is to incorporate Scottish Planning Policy (SPP) it is noted that very few of the policy 'tests' relating to onshore wind contained within SPP appear within the draft NPF4. More worryingly neither does the explicit requirement for development plans to develop spatial frameworks.

	This in our view is the best way to identify those areas that are likely to be most appropriate for onshore wind farms, particularly if it can also consider landscape capacity. The Council's opinion is that the current statement within SPP that 'Planning should direct the right development to the right place' must remain a key guiding principle in Government policy. The 2019 Act defines the purpose of planning as management of development and use of land in the long-term public interest. While onshore wind development will contribute to sustainable development and meet a range of the national outcomes, it is clear that there is a need for a holistic and planned approach to onshore wind energy, and energy more generally, and therefore policy and strategy must be clearly articulated and aligned in both the Statement and NPF4. Failure to take a planned approach will inevitably lead to development proposals taking longer to progress to decision and create increased uncertainty for developers and communities. It is considered that a planned approach is most likely to deliver the ambition and benefits sought and facilitate the management of use of our natural resources (whether that be peat, landscape or hydrology) in the long-term public interest.
2.	**How can the maximum number of developments be enabled to build-out without finance acting as a barrier?**
	It is agreed that a wide range of financial mechanisms should be investigated to support the development of renewable technologies including onshore wind in Scotland. There are a significant number of schemes that have been through the planning process and received consents but are yet to be built and indeed may never be. These may give a false position in terms of their contribution to the overall ambition. Worse they may be preventing delivery of competing but viable nearby development. Further financial options might help unlock this. The financing of a development is influenced by risk. The market is most likely to respond more effectively where there is greater certainty. Planning can help to provide greater certainty for development proposals. In order to achieve any significant additional capacity, it needs to be properly planned, through national, regional and local spatial planning, that takes into consideration the views and aspirations of our communities. This is not only relevant to wind energy development but the transmission network also. This is particularly relevant where host communities are not directly benefitting from development. As mentioned in response to Q1, a more holistic plan led approach to how we deliver an increase of our renewable energy capacity is required. The draft NPF4 does not currently set that out as an intention and with regard to onshore wind no longer includes specific reference to the need for spatial frameworks, which in our view is a missed opportunity. This omission will be highlighted within our response to the consultation on NPF4, but we believe that the Onshore Wind Policy Statement Refresh should adopt this approach and for this to influence the outcomes of NPF4.

	Collaborative working between the industry and local authorities can facilitate the delivery of better-quality proposals and address the constraints to development allowing appropriate levels of development in the right place. Relationship building is also critical to ensure understanding of matters from both sides and to foster a mutual understanding of the challenges faced in delivery and management of development.
3.	**Can more be done to support the use of PPAs/Private Sector Finance? Is there a need for more policy signals from SG, and/or UKG, to provide investment security/surety?**
	This is more a question for industry and therefore The Highland Council offers no comment.
4.	**This section also underlines the Scottish Government's strong commitment to the role of community energy, and to community benefit and shared ownership. In what ways can we maximise the benefits of these policies as onshore wind development and repowering increases over the coming decade?**
	The Council welcomes the work that Scottish Government has undertaken to revise the good practice principles for community benefits and shared ownership. However, we are seeing a trend towards reduced community benefit payments to as low as £3000/MW as opposed to the expected £5000/MW. In addition, the Scottish Government's ambition for half of all newly consented renewable schemes to have an element of shared ownership does not appear to being met within Highland. Key reasons for this are not only related to gaps in the knowledge and skills of individuals/communities to take advantage of these opportunities but most likely the capacity to secure financial support and take on that risk. One way to de-risk this process and make it easier for communities might be for the community to have a share of the profits of a turbine or turbines while the operator continues to own and maintain the asset. Policy could simply require new development to provide a level of community benefit and shared ownership if they are to be accepted. Indeed, a firmer stance and expectation from Scottish Government could help. However, this is unlikely to be sufficient in itself. There is a need for Scottish Government to prioritise the resourcing of delivering community benefits and shared benefits at the local level. Financial and professional support to community groups is essential to enable them to participate in this process. Local authorities or other institutions could play a supporting role in the development of community benefit, although the distinction between regulator and facilitator would need to be very clearly defined. A number of communities in Highland have had significant benefit from onshore wind development; where this has been well managed, facilities and projects of long-term benefit have been delivered. However, the benefits being based on a financial model only can, at times, have limited benefit in limited areas. Wider community benefits such as provision of training programmes, education, apprenticeships can have wider economic benefits and there should be clear and strong encouragement.

5.	**What more can be done to ensure that financial mechanisms are available to support development at differing scales?**
	This is more a question for industry and therefore The Highland Council offers no comment.
	Chapter 2 – Future Position and Net Zero
6.	**What are your views on the installed onshore wind capacity that will be necessary over the coming decade, recognising the ambition Scottish Government have proposed for 8-12GW? Please share any evidence.**
	The draft Statement sets out the numerical ambition (or target?) early within the document and while there are embedded links to support the figure, the Statement would benefit from providing an up-front one-page information sheet of working/scenarios that support the figure to help give a balanced overall picture of how that figure was arrived at. As mentioned in response to Q1, Scotland would appear to be disproportionately increasing its onshore wind deployment when compared to the rest of the UK. There is no clear justification to understand why that should be. Nevertheless, the ambition seems very ambitious. The Council is already under significant pressure to process and/or comment on what is either in planning and/or will be submitted imminently and this is only likely to relate to a fraction of the additional 12GW ambition. While the Council welcomes the relatively recent introduction of fee increases for Electricity Act applications, and the proposed fee increases for planning applications, the current challenge is the impact that this has on already limited staffing resource. Even where it might be possible to recruit officers to process planning applications there is likely to be a considerable period of time delay in them acquiring the necessary skills and experience. What is clear is that any significant increase in onshore wind capacity will not be achieved by repowering. Not all sites will be suitable or capable of being repowered and repowering, when acceptable, will only provide for a small increment in capacity over an existing scheme when considered in the wider context. However, the fact that these sites are currently considered in policy terms to be suitable sites in perpetuity and that this is a strong material consideration means that they should be considered first before the promotion and development of new sites. It is our experience that all existing sites are looking to sweat the asset rather than progress with plans for true repowering. While important to maintain the current level of generation it is likely that, given the age of some of the turbines, in the next 10 years a number of these will require to be decommissioned and we will therefore lose that capacity.

	The reality is that a large number of turbines of greater output (and size) will be needed to fulfil the ambition. These will have a potentially significant impact on our landscapes, their qualities and our communities. The fact that Highland has 1.85GW of installed onshore wind and a further 900MW consented and/or in construction is testament to the work that this planning authority has done to ensure, by and large, that development can be accommodated without significant adverse impacts on species, our landscape and our communities. Achieving the new ambition is likely to be extremely challenging. With an expectation that Highland will continue to be under pressure to accommodate yet more capacity this is likely to undo much of the mitigation that we have already secured and will inevitably lead to greater conflict with the wishes and aspirations of our communities and our environment. It is more important than ever that the principle of the right development in the right place should continue to apply and the Statement, along with NPF4, should be reflecting that within policy wording. Priority should be given to enabling those developments that have already been through public scrutiny and detailed evaluation over the provision of extensive new sites. As part of the green transition, other generating technologies must also be given an opportunity in order to avoid an over-reliance on wind power. This includes solar, tidal and hydrogen (accepting that wind has a significant role here). Offshore wind presents the greatest opportunity. While it is acknowledged that much of that will not be operational until after 2030, and will contribute to the later targets, an active acceleration of the offshore programme would help reduce the need for such extensive onshore provision. The ability of existing consented sites (or sites in the planning process) to connect to the grid network will have a major influence on meeting the ambition. Aligned to that will be the need to take an infrastructure first approach to maximise the potential of existing established networks and avoid the need for new infrastructure and therefore impacts on new communities, while at the same time recognising the impacts already made and those likely to be faced by the host communities of this infrastructure. Furthermore, all types of energy storage need to be considered and deployed at significant scale nationally to ensure that the energy potential for existing and proposed schemes is fully utilised. This all supports the need for a coordinated plan led approach.
7.	**What more can be done to capture the potential and value of hydrogen production from onshore wind and how best can we support the optimal integration of these technologies?**
	The Council welcomes the reference to hydrogen in the document and feels that there is great potential to develop hydrogen production in association with wind farms whether onshore or offshore.

	A suggestion is that the Statement should set out a requirement for new windfarm developments to be developed as one component of an energy hub where hydrogen production, potentially combined with other energy generation or storage, can assist with delivering a more decentralised/distributed energy system that can help deliver a routemap for the decarbonisation of heat and transport. However, to date, while we have seen a number of projects brought forward to planning, we understand from the industry that the market conditions are not favourable for delivering such developments on the ground. Until a critical mass is reached it is unclear what role it will play. Again, this should link into an energy planning requirement through NPF4, Regional Spatial Strategies and Local Development Plans.
8.	**In what way(s) can we maximise the benefits of repowering over the coming decade?**
	While repowering is unlikely to significantly contribute to the stated ambition, it is a useful place to start. Much of the infrastructure within existing sites can be reused. As indicated in the response to Q6 our experience is that operators will in the main, only consider extending the life of an existing scheme and/or developing an entirely new scheme within a similar and/or extended site boundary. There is a missed opportunity for an intermediate solution that utilises the entirety of the existing scheme with only the blades, rotors and nacelle requiring to be changed/uprated. It is technically feasible. This would be particularly useful where the introduction of larger wind turbines would significantly impact on landscape/visual considerations and it would avoid having to address obstacles with regard to access/egress with larger components. This could also support a domestic industry engaged with refurbishing/retrofitting. In the same way that the expectation for community benefit/shared ownership applies to new development it should apply to proposals for repowering. There may have been no or limited benefits flowing to communities from the early schemes, and this would provide an opportunity for these to be renegotiated. This is equally true of those communities who may not directly benefit from onshore wind schemes but are impacted by their transmission infrastructure i.e., upscaled substation infrastructure. In addition, there is equally an opportunity to explore net biodiversity gain that could have positive impacts on communities through wellbeing improvement and the potential wider economic benefits.
	Chapter 3 – Barrier to Deployment and Reserved Matters
9.	**We would be grateful for comments on the issue of aviation lighting and suggestions for the focus and outputs of the Aviation Lighting Working Group – what are your views on the assessment of aviation lighting and how should this be undertaken?**

	As most new developments are likely to trigger the need for aviation lighting, the provision of guidance from the working group at the earliest opportunity is critical. The work that NatureScot has done to date has been useful and has improved the quality of assessments. However, feedback received on assessments is that a number of matters are not given the attention required. These include:- • the impact of the movement of the blades in particular wind directions i.e., the perceived flickering effect; • understanding of likely illumination levels and how this relates to context i.e., intensity of other lights you'd see in the night sky or car brake lights; and • the need for clear guidance as to what types of mitigation might be possible and acceptable i.e., is radar activated lighting more or less intrusive than lights being on all the time and people getting used to it? Whatever the mitigation, all options need to be fully considered. In many of the proposals for turbines of 150m + that have been considered in Highland, the default position of the applicant has been that visible lighting is required. However, this is not always appropriate, particularly where it may have an impact on the special qualities of a landscape designation, wild land area or area which generally enjoys expansive dark skies. Low candela aviation lighting is a feature on a number of turbines in Highland but since the advent of 2000 candela lighting on larger turbines, there have been long drawn-out discussions to reduce the impact of these on our landscapes and communities. 90% of the time this has been achieved. It is expected that the Aviation Lighting Working Group will develop a solution, or solutions, to aviation lighting that minimises landscape and visual impacts (and impacts on wildlife) and brings these proposals forward as a matter of urgency for them to become embedded into all schemes.
10.	**We would also be grateful for your views on network charging and any of the other aspects set out under section 3.4.**
	There is a need to ensure that connection costs are fair and proportionate and do not form a barrier to development and investment or indeed to the consumer. The ambition will not be met (even if sufficient planning permissions are granted) unless there are means to connect to the grid effectively and affordably. Some pressure may be able to be taken off the transmission/distribution constraint through combining wind energy production with other renewable energy if co-located within an energy hub arrangement.

	There is a need to consider networks, in a planned way, alongside additional onshore wind capacity at the national, regional and local scale. While it is recognised that network policy and regulation is reserved, planning policy is not. There may be an opportunity, through NPF4, for the Scottish Government to secure greater collaboration between stakeholders to ensure that there is a better fit between renewable energy capacity and infrastructure investment, particularly considering the move towards an infrastructure first approach. The Highland Council area is now a net exporter of electricity to the national grid. Due to the historic method of calculating transmission charges, households and business customers in the north pay some of highest rates for electricity. Based on the standard tariffs and average daily use, this costs each household an extra £60/year compared with central Scotland. While the Council recognises that Ofgem are undertaking a review of transmission charges it is understood that they are not expecting to make any immediate changes. The Council asks that the Scottish Government lobby for fair tariffs for the Highlands, in particular to require that:- 1) transmission charges for the north of Scotland are immediately brought into line with the south of Scotland; and 2) future charges are lowered further to reflect that the Highlands are a net exporter of green energy.
	Chapter 4 – Barrier to Deployment: Environmental Factors
11.	**What are your views on the integration of taller turbines in forested areas?**
	Our experience is that while keyholing is often explored through the initial planning of a development it rarely follows through to deployment. In most cases, development results in clear felling. With the need to retain and restock existing forestry as well as create entirely new woodland there is potential for onshore wind to be competing/conflicting with other such land uses. In addition, many developments are now delivering peatland restoration instead of re-foresting a site. This is welcomed, and accords with the provisions of the Control of Woodland Removal Policy but still adds to the conflict between land uses. While modern turbines, at substantially increased height, are likely to be more efficient on account of the potential for reduced turbulence, the retention of trees needs to be balanced against the increased landscape impacts of taller turbines. The retention of trees, as an understood scale reference, may actually accentuate the height of turbines in a view so may appear to have greater landscape and visual impacts than if there were none.
12.	**Can you provide best practice examples for effective peatland restoration (with carbon benefits) alongside the development of onshore wind?**

	The Council has experience of a few schemes where peatland restoration has taken place on wind farm sites, however, would not necessarily highlight these for best practice examples. What we have seen more of is good construction methods employed on site to avoid peat becoming degraded.
13.	**What, if anything, is not currently reflected in the good practice guidance for constructing windfarms, in relation to building on peat and other carbon-rich soils?**
	We would wish to see an agreed definition of what would be considered deep peat.
14.	**From your own experience what can wind farm developments offer in terms of protecting and enhancing the natural environment, in particular through the planting of trees to compensate for those lost during windfarm development and through peatland restoration?**
	It is considered that windfarm development can deliver positive effects for biodiversity. This is most witnessed where development provides an opportunity to restore degraded peatland and/or other habitats within and/or adjacent to the site. Habitat Management Plans and legal agreements are often employed to secure both on and offsite delivery. On the other hand, wind energy can have adverse impacts on some species, including direct impacts to birds and bats from turbine collisions, and the loss and fragmentation of species' habitat. More could be done to understand such impacts on nature. We need to ensure that proposals are the right development in the right place, not only from a landscape perspective but also from the perspective of biodiversity. In this regard the Council supports the policy requirement set out within draft NPF4 for all development to contribute to the enhancement of biodiversity. On a pedantic point it is questionable whether compensatory planting can be considered an example of protecting and enhancing the natural environment. The natural environment, including trees, should be safeguarded from development unless development results in net environmental benefit. There are clear benefits where crop timber is to be removed and peatland restored providing this is done correctly. Woodland creation in areas that are most suited to this land use would be considered as further enhancement. On this point there may be benefit in considering strategic opportunities for offsetting and/or biodiversity enhancement where a pulling of resource may result in additional benefits to biodiversity and potentially to the wellbeing and the economy of a place and its community. We are aware that SSE Transmission is currently looking to adopt this approach within Highland, having done so already in Argyll, and we will be working with them to deliver this.

15.	**Can you provide best practice examples of encouraging biodiversity protection and enhancement, including connectivity between natural areas in wind farm sites?**
	The Highland Council offers no comment.
16.	**What is your organisation doing to go above and beyond when it comes to biodiversity protection, conservation and enhancement in wind energy development sites?**
	The Council is now requiring additional tree planting, securing contribution to delivery of nature enhancing initiatives (such as the Regional Golden Eagle conservation management plan), early adopter of biodiversity enhancements and securing this via condition.
17.	**How can habitat management plans better balance protection of the environment with connectivity and the operation requirements of a site?**
	As indicated in our response to Q14 Habitat Management Plans and offsite delivery (where appropriate) are an ideal means of achieving enhanced biodiversity. Offsite delivery can assist with easing the operational requirements of a site.
18.	**What support do Scottish companies need from Scottish Government and agencies in order to successfully bid for and win contracts?**
	This is more a question for industry and therefore The Highland Council offers no comment.
19.	**Should government consider options for introducing a sector deal similar to that of the offshore wind sector and if not, why is that your view?**
	As indicated in our response so far, the Council considers that the future deployment of onshore wind relies on a strategic and plan led approach. Doing so gives certainty to communities and developers. In a practical sense this strategic requirement would need to be included within NPF4, not just the Onshore Wind Policy Statement, in order to ensure that it did not simply consider schemes over 50MW and that a more holistic approach to deployment can be considered.
20.	**How can individual organisations (including onshore wind developers, tier 1 suppliers, and the domestic supply chain) work collaboratively to ensure that key manufacturing projects for Scottish onshore wind stays in Scotland?**
	This is more a question for industry and therefore The Highland Council offers no specific comment but would support the aim.

21.	**Circular economy and zero-waste are core principles that the Scottish Government are promoting. Where do you see the economic opportunities in relation to these policy issues lying with onshore wind? And are there any practical issues you think need to be addressed in order to maximise the benefits?**
	As there are many similarities between the technologies deployed onshore and offshore there is an opportunity for components used in the former to be recycled for use in the latter and potentially support the manufacture of new components. For components that can't be easily recycled, such as blades, there is potential for an industry to be established around its use as a raw material in other structures i.e., roads/concrete etc. This suggests that there is potential for our energy ports to take advantage of not only the potential of offshore wind and hydrogen in the future but also to look at the synergies with other industry including onshore wind.
22.	**How can the Scottish Government best support skills for the future of the onshore wind sector? Specifically, we would be interested in oil and gas transition, apprenticeships and entry-level position for young people, as well as any other experiences you can share.**
	There is an opportunity for R&D around retrofitting/repowering existing schemes. Otherwise, given many of the similarities in skills, there are opportunities to link with the existing supply chain skills development programmes as well as those of the emerging supply chain to support offshore wind i.e., Nigg Skills Academy and North Highland College UHI etc.
23.	**Do you have any views on the impact of wind farms on tourism?**
	The Council is aware of a number of studies, surveys and reports that have been produced over the years, commissioned for various purposes, but there is no single definitive, and importantly, impartial study that can be relied upon. It would therefore be helpful for there to be a definitive study into this issue or at the very least further guidance and/or a methodology for considering how this issue should be assessed. The Council considers that it is wrong to conclude that there is no impact on tourism, but we recognise the difficulty in quantifying what the effects are, nonetheless. By and large these will relate to the siting and design and the acceptability of a proposal in relation to landscape, visual and residential amenity impacts. There will also likely be short term impacts as a result of the construction of wind farms due to congestion within the road network.

	It is therefore disappointing that the draft Statement does not consider landscape and visual matters in any great depth and in particular reinforce that, while we all recognise that climate change and net zero ambitions require decisive action, this should not mean that we accept significantly detrimental impacts on our landscape and the amenity of our communities. The Council does not consider that we should only be protecting the most valuable landscape designations; rather that we should secure the right development in the right place. Coming back to the point made regarding a plan led approach, most local planning authorities that host wind farm development will have produced landscape sensitivity and/or capacity studies of one sort or another over recent years. These will remain relevant and useful to determining the scope for development plans and regional strategies to support the national ambition.
24.	**What is your organisation doing specifically to promote diversity and inclusion in the onshore wind sector?**
	This is more a question for industry and therefore The Highland Council offers no comment.
25.	**Given the significant contribution onshore wind is expected to make to our net-zero ambitions, and the structure of the ScotWind process for offshore development, should Supply Chain Development Plans be introduced for onshore wind developments in Scotland?**
	This is more a question for industry and Highlands and Islands Enterprise; however, the Highland supply chain has benefitted from the deployment of onshore wind energy to date albeit not at the scale that we could have hoped for or might see in the future with the development of offshore wind. With established experience and the need to further transition from oil and gas Highland is well placed to use our current knowledge and infrastructure to support renewable energy development. Establishing frameworks that support the Highland supply chain further would be advantageous.
	Annex 1 – Eskdalemuir working group and policy proposal
26.	**Does the above accurately reflect the current position in relation to the Eskdalemuir Seismic Array and the barrier it presents to deployment in Scotland?**
	The Highland Council offers no comment.
27.	**Acknowledging that the Scottish Government require further evidence before taking a policy decision, at this point and reflecting the options outlines above for you/your organisation have any thoughts?**
	The Highland Council offers no comment.

28.	**If Option 2 or Option 3 were to be selected, how could we best achieve or calculate an acceptable level of impact? (One example being an agreement of a standard noise budget to MW generated proportional allocation i.e., for X MW generated = X amount of budget allocated).**
	The Highland Council offers no comment.
29.	**Do you/your organisation have any thoughts on how the EWG might be restructured to ensure continued engagement for interested parties whilst maintaining the core purpose of the group?**
	The Highland Council offers no comment.
30.	**We are clear on the value and importance of strategic and productive collaboration between the aviation and wind energy sectors. What are your thoughts on our proposed restructuring of the current effort and activity in this area, and the proposed Aviation and Renewables Collaboration Board?**
	The Highland Council offers no comment.
31.	**The work of the Aviation and Renewables Collaboration Board may identify and agree the need technical or strategic investment to achieve specific goals or outcomes. What are your views on how work of this kind might be financed?**
	The Highland Council offers no comment.