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# GLENSAUGH RENEWABLE ENERGY DEVELOPMENT, NEAR LAURENCEKIRK, ABERDEENSHIRE, AB30 1HB

PLANNING, DESIGN AND ACCESS STATEMENT  
FOR A SINGLE WIND TURBINE AND  
ASSOCIATED ACCESS TRACK AND CABLE

On behalf of ITPEnergised/The James Hutton  
Institute

December 2023

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## Document history

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# 1 INTRODUCTION

## 1.1 Background

1.1.1 This Planning Statement has been prepared by Stephenson Halliday (SH) on behalf of ITP Energised/ James Hutton Institute in relation to a proposed renewable energy development at the Applicant's Glensaugh Farm sited near Laurencekirk, Aberdeenshire.

## 1.2 The Applicant

1.2.1 The Applicant for the Proposed Development is the James Hutton Institute, and the Proposed Development relates directly to one of their research farms, Glensaugh Research farm.

1.2.2 The James Hutton Institute is a globally recognised research organisation delivering fundamental and applied science to drive sustainable use of land and natural resources. The Institute's research farms have been at the forefront of innovation in agricultural practices; trialling and testing transformative ways of managing their land.

1.2.3 Glensaugh Research Farm is managed as an upland livestock farm, at just over 1,000 hectares (ha) in area and is the home of the Institute's Climate-Positive farming initiative. Innovative research into agricultural practices and environmental management has been carried out at Glensaugh for 80 years.

1.2.4 The Institute has secured funding from the Scottish Government's Just Transition Fund to design and build *HydroGlen*. HydroGlen is a green hydrogen powered farming community demonstration facility, aiming to showcase how farming and other rural communities can become self-reliant, low-carbon energy producers and exporters, generating 100%+ of their energy requirements (electricity, heating, and transport) through a combination of renewable electricity and green hydrogen production.

## 1.3 The Proposed Development

1.3.1 *HydroGlen* consists of three separate components as follows:

- A single wind turbine with an anticipated installed capacity of up to 1 MW, a proposed maximum hub height of 50 m and maximum tip height of 76 m with associated access track and cable;
- A green hydrogen production facility with electrolyser, fuel cell (expected capacity 100-200 kW, subject to final design) including a hydrogen storage facility and associated Battery Energy Storage System (BESS) facility, and hydrogen fuelling station;
- A small-scale mix of ground and roof mounted solar array with a maximum installed capacity of 210 kW;

1.3.2 There are two separate areas at the Glensaugh Estate proposed to be developed. The first development area relates to the main Glensaugh Farm building complex and surrounding

agricultural fields to the east, where the proposed hydrogen and solar development will be located.

- 1.3.3 The second development area is that for the proposed wind turbine which would be located on Loch Hill, within the Glensaugh Estate and which is approximately 2 km north of the proposed hydrogen and solar development.
- 1.3.4 Following pre-application advice from Aberdeenshire Council, it has been concluded that the most effective approach to seek permission for these components would be through the submission of two separate planning applications. **This planning statement relates to one of these components - the proposed wind turbine, including access track and cable route.** Hereafter referred to in this Planning Statement as the 'Proposed Development'.
- 1.3.5 The planning application for which this Planning Statement has been prepared will be submitted in parallel with a separate application for the solar and hydrogen components.

## 1.4 Application Documentation

- 1.4.1 This Planning Statement forms part of a suite of documents prepared in support of the application and should be read in conjunction with the following technical reports and supporting drawings.
- 1.4.2 Planning drawings submitted to Local Planning Authority (LPA) to illustrate the development for which planning permission is sought for the wind turbine are:
- Site Location Plan
  - Site Layout Plan - Wind Turbine
  - Site Location Plan - Turbine Development Area
  - Residential Receptors within 2km
- 1.4.3 Other plans provided to present these proposals in the context of the overall project are:
- Site Location Plan - Hydrogen and Solar Development Area
  - Site Layout Plan - Solar, BESS, Hydrogen, EV Chargers
  - Shadow Flicker Study Area
- 1.4.4 Reports submitted to the Local Planning Authority (LPA) to support both planning applications are:
- Noise Impact Assessment
  - Ecological Impact Assessment
  - Transport Statement and Construction Traffic Management Plan
  - Environmental Appraisal (Focusing on Cultural Heritage)

- Landscape and Visual Appraisal
- Flood Risk & Drainage Statement

## EIA Screening Request

- 1.4.5 The scheme as whole falls under Schedule 2, 3 *Energy Industry* of the Town and Country Planning (Environmental Impact Assessment) (Scotland) Regulations 2017. Schedule 2 Class 3(a) is for the production of electricity, and Class 3 (j) is specifically for installations for harnessing wind power for energy production. The proposal exceeds the threshold of Class 3(a) with the site area exceeding 0.5 ha and the threshold of Class 3 (j) with the hub height of the turbine exceeding 15 metres. Consequently, the scale and nature of the development meant it had to be 'screened' to assess whether it constituted Environmental Impact Assessment (EIA) development. If the LPA deemed the project as 'EIA development' it would need to have been the subject of an environmental impact assessment and the applications accompanied by EIA reports.
- 1.4.6 An EIA screening request was submitted to Aberdeenshire Council in February 2023. The information provided as part of the Screening Request was considered to provide sufficient information for the LPA to adopt an opinion as to whether the scheme constitutes EIA development.
- 1.4.7 On the 6<sup>th</sup> April 2023 Aberdeenshire Council adopted an EIA Screening Opinion (Ref: ENQ/2023/0425). It was concluded:
- "...As the Proposed Development will largely lie within the area covered by existing farm buildings apart from the field where the solar panels would be sited and Lochhill where the turbine will be sited, the Proposed Development is unlikely to have any significant impact upon the Local Nature Conversation Site. As such, based on the information available at the time of assessment, the Planning Service is satisfied that the proposal does not suggest significant environmental impacts would occur and therefore no formal EIA is required."*
- 1.4.8 As such the Local Planning Authority does not consider that the scheme requires an Environment Impact Assessment (EIA) and no EIA report need accompany either application.

## 1.5 Pre-application Request

- 1.5.1 Two Pre-Application Advice requests were submitted to Aberdeenshire Council to ascertain the Planning Authority's view on the likelihood of planning permission being granted for the Proposed Development. Each pre-application submission was tailored to address the specific components of the overall scheme.
- 1.5.2 On 21<sup>st</sup> December May 2022 Aberdeenshire Council responded to say that the authority was supportive of the Proposed Development in principle and that it would be in accordance with the Aberdeenshire Local Development Plan 2023 and the National Planning Framework 4, subject to the detailed scheme and supporting information addressing the key issues such as impact on landscape, built and natural heritage and the amenity of those living in the area proving to be acceptable.

## 2 THE SITE AND SURROUNDINGS

### 2.1 The Site

- 2.1.1 The application site is located within the Glensaugh Farm complex. The James Hutton Institute's Glensaugh Research Farm is managed as a 1,000 ha upland livestock farm and a Climate-Positive Farming Initiative. The nearest settlement, Auchenblae, is located approximately 3.7km east from the site and approximately 6.3km north-west of the village of Laurencekirk.
- 2.1.2 The main farm complex comprises several modern agricultural buildings including sheep and cattle buildings and a number of residential properties.
- 2.1.3 Access to the site would be gained via a new access track and junction from the unclassified road within the Glensaugh Estate.

### 2.2 Surroundings

- 2.2.1 The application site and its immediate surrounds are located within the 'LCT 29: Summits and Plateaux – Aberdeenshire Landscape Character Type (LCT) as such it is the 'host' landscape for the Proposed Development.
- 2.2.2 The application site is also located within the Braes of the Mearns Special Landscape Area; a local landscape designation placed on an area that exhibits qualities and characteristics within them that are valued locally. The landscape of the Braes of the Mearns features a juxtaposition of flat farmland and wooded areas, highlighted by a dramatic and rugged ridge to the north that indicates the presence of the Highland Boundary Fault.
- 2.2.3 There are no national landscape designations, such as National Scenic Areas (NSAs) or National Parks in the nearby area.
- 2.2.4 The River Dee Special Area of Conservation (SAC) lies within 4.2km to the north of the site (and within 2.4 km at its closest tributary).
- 2.2.5 Within the site is the Strathfinella Local Nature Conservation Site (LNCS), this is a non-statutory designation, designated for its geological and botanical interest.
- 2.2.6 There are no World Heritage Sites or Historic Battlefields located within or close to Glensaugh Farm.
- 2.2.7 There are, however, a number of nationally designated sites of high national importance in the immediate vicinity (Scheduled Monuments). These are:
- Cairn o' Mount Cairns - two burial cairns dating from the Neolithic and Bronze Age (SM4968). The Scheduled Monument is located 125m and 175m to the north-east of the summit of Cairn o'Mount (approximately 2.7 km north-west of the proposed turbine location).
  - Glensaugh Farmstead and Field System (SM4842) is located approximately 1 km north-west of the Glensaugh Farm and 1.4 km south-west of the proposed turbine location.

- 2.2.8 Further designated sites (Scheduled Monuments) of national importance are sited within 5 km of Glensaugh Farm include:
- Kincardine Deer Dyke and Settlements N of Burn of Garrol” (SM 7881 & SM 7882)
  - Arnbarrow, Farmstead and Field System 900m NW of” (SM 4960)
  - Green Castle, earthwork (SM 4264)
  - The Ring, Enclosed Cairn 750 m SE of Arnbarrow (SM 4967)
- 2.2.9 The nearest Listed Buildings are Clatterin Bridge over Devilly Burn (B-listed) (LB 10741) and Clatterin Bridge Limekiln (C-listed) (LB 10741), both are located approximately 500m west of Glensaugh Farm (2.1 km south-west of the proposed turbine location).
- 2.2.10 Numerous scattered dwellings lie within 5 km to the south and east of the site. The closest residential property outside the boundary and ownership of Glensaugh Farm is No. 2 Cottage, located on the north side of the road immediately opposite the farm entrance. The other closest property is Old Lodge west of the access road.

## 3 THE PROPOSAL

### 3.1 The Proposed Development

- 3.1.1 This Planning Statement supports is the **Proposed Wind Turbine Development**. This comprises a single wind turbine with an anticipated installed capacity of up to 1 MW, a proposed maximum hub height of 50 m and maximum tip height of 76 m with associated access track and cable. This cable connection maybe underground or an overhead line, it has been assessed as overhead as a worse case for the Landscape and Visual Appraisal.

#### **Proposed Wind Turbine Development**

- 3.1.2 The turbine is to be positioned on Loch Hill, 316 metres above sea level, approximately 2 km north of the Proposed Hydrogen and Solar Development. In common with other wind turbine developments, the planning application and this statement are based upon a ‘candidate’ turbine typology. The exact details of which turbine would be erected would be determined based upon turbine availability and procurement prior to construction. For this reason, a degree of flexibility on turbine type needs to be adopted within the planning application and its determination. In this case, for the purposes of the assessment, maximum turbine dimensions and operational attributes have been established using the Vestas V-52 as a candidate turbine model; except for the Transport Assessment where an EWT DW61, on a 50metre hub, has been selected to present the ‘worst case’ scenario.
- 3.1.3 The proposal provides for some flexibility in the precise location of the turbine, access track and cable route. The precise locations would be determined following geotechnical assessments and a 100 m micro-siting allowance is sought to allow flexibility in the precise positioning of these components. All of the assessments take account of this micro-siting allowance.
- 3.1.4 The proposed wind turbine has been designed with a tapered tubular steel tower supporting a nacelle. Within the nacelle, components such as the gearbox or direct drive, generator,



transformer, and other related equipment would be housed. Connected to the nacelle, the hub and rotor assembly, featuring three blades, completes the turbine. The design follows a standard modern configuration, with a horizontal axis and three blades, presented in a semi-matt white or light grey finish.

### **Crane Hardstanding**

- 3.1.5 A crane hardstanding area and turning area are required to enable the construction of the turbine. The specific details of this will be finalised once the specific wind turbine has been selected. The hardstanding would be constructed from crushed stone / aggregate, and it is expected that the hardstanding materials would be provided from a local quarry. The hardstanding would remain in-situ for the duration of the lifetime of the proposed turbine to facilitate maintenance work and emergency access purposes.

### **Electrical Infrastructure and Cabling**

- 3.1.6 As the whole development site (i.e. the proposed wind turbine development (this application) and the proposed hydrogen and solar development) would include multiple renewable electricity generating assets, transformers and inverters would be required in several locations. The Proposed Wind Turbine Development would require an inverter (if not provided within the wind turbine tower) and a step-up transformer and step-down transformer.
- 3.1.7 The turbine would be connected to the hydrogen plant and Battery Energy Storage System (BESS) (within the Proposed Hydrogen and Solar Development) via electrical cabling. The proposed route this cable is provided in the supporting plans.

### **Site Access**

- 3.1.8 Access to the proposed turbine would be gained from a partly-new access track and upgraded access junction (to be slightly modified for large vehicle turning) from the unclassified road within the Glensaugh Estate. The new access track would follow the line of an existing farm track where possible, would be approximately 950 metres in length and would primarily consist of locally acquired stone and have a standard width of 5 metres. Approximately 700 metres of existing track will be upgraded.

## **4 DEVELOPMENT PLAN AND MATERIAL CONSIDERATIONS**

### **4.1 Introduction**

- 4.1.1 Sections 25 and 37(2) of The Town and Country Planning (Scotland) Act 1997 require applications for planning permission to be determined in accordance with the Development Plan unless material considerations indicate otherwise.

### **4.2 The Development Plan**

- 4.2.1 The Development Plan for the application site consists of:

- National Planning Framework 4 (NPF4) adopted 2023; and

- Aberdeenshire Local Development Plan (ALDP) adopted 2023.

## National Planning Framework 4

4.2.2 NPF4 was published by the Scottish Government on 13 February 2023. It sets out spatial principles, regional policies, national developments and national planning policy. NPF4 replaces the NPF3 and Scottish Planning Policy (SPP). Unlike NPF3, NPF4 now forms part of the statutory Development Plan.

4.2.3 The NPF4 sets out in its introduction that ‘Scotland’s future places will be Net Zero.’

### Sustainable Places

4.2.4 The national spatial strategy for sustainable places states:

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

*Meeting our climate ambition will require a rapid transformation across all sectors of our economy and society. This means ensuring the right development happens in the right place.*

*Every decision on our future development must contribute to making Scotland a more sustainable place. We will encourage low and zero carbon design and energy efficiency, development that is accessible by sustainable travel, and expansion of renewable energy generation.”*

### Applying NPF4

4.2.5 In terms of applying NPF4, the Chief Planner’s letter - transitional arrangements for National Planning Framework 4 (February 2023) sets out that the NPF4 should be read as a whole and that conflicts between policies are to be expected. Factors for and against development will be weighed up in the balance of planning judgement.

4.2.6 The Chief Planner’s letter also outlines that:

*“Whether an LDP [Local Development Plan] has been adopted prior to or after the adoption and publication of NPF4, legislation states that in the event of any incompatibility between a provision of NPF and a provision of an LDP, whichever of them is the later in date is to prevail (Town and Country Planning (Scotland) Act 1997 (“the 1997 Act”); section 24(3)).”*

### NPF4 Relevant Policies

4.2.7 It is considered the following policies in the National Planning Framework 4 are relevant to the Proposed Development:

- Policy 1: Tackling the Climate and Nature Crises
- Policy 2: Climate Mitigation and Adaptation
- Policy 4: Natural Places
- Policy 7: Historic Assets and Places

- Policy 11: Energy
- Policy 22: Flood risk and water management
- Policy 23: Health and safety
- Policy 29: Rural Development

## **Aberdeenshire Local Development Plan (2023)**

4.2.8 The pre-application response identified that following policies in the Aberdeenshire Local Development Plan are relevant to the Proposed Development:

- Policy C2: Renewable Energy
- Policy C4: Flooding
- Policy P1: Layout, siting and design
- Policy R2 Development Proposals Elsewhere in the Countryside
- Policy RD1: Providing Suitable Services
- Policy E1: Natural Heritage
- Policy E2: Landscape
- Policy HE1: Protecting Listed Buildings, Scheduled Monuments and Archaeological Sites (including other historic buildings)

## **Supplementary Planning Guidance**

4.2.9 Alongside the Aberdeenshire Local Development Plan there is detailed guidance on particular issues and policies, which help inform the planning application decisions known as Supplementary Planning Documents. These have been adopted and so supplement the Development Plan. The most relevant Supplementary Planning Documents are set out below:

**Landscape Sensitivity Assessment – Onshore Wind Energy Development in Aberdeenshire Planning advice PA2023-03.**

4.2.10 The main purpose of this Planning Advice is to steer planning applicants towards the most appropriate locations for siting onshore wind energy development in relation to landscape sensitivity.

**Landscape Character Advice for Small Scale Development Planning advice PA2023-07**

4.2.11 In support of Policy E2 Landscape of the Aberdeenshire Local Development Plan (LDP) 2023 this Planning Advice describes the character of different landscape types across Aberdeenshire, explaining what makes each landscape distinctive. Although targeted at small-scale development, the guidance has relevance to all scales of development.

### **Securing positive effects for biodiversity in new development Planning advice PA2023-10**

- 4.2.12 This Planning Advice has been designed to provide stakeholders, developers, landowners and communities with details of the requirements for biodiversity enhancement as outlined in Policy P1 Layout, Siting and Design of the Aberdeenshire Local Development Plan 2023 (LDP).

### **Development in the Countryside Policies R1 and R2 including Organic Growth of Settlements Planning advice PA2023-11**

- 4.2.13 This Planning Advice has been designed to give best practice guidance in support of the delivery of developments that are appropriate to Aberdeenshire's countryside. It sets out what applicants may be expected to provide in order to support an application and demonstrate compatibility with the frequently used aspects of Policies R1 'Special Rural Areas' and R2 'Development Proposals Elsewhere in the Countryside' of the Aberdeenshire Local Development (LDP) 2023.

### **Baseline Ecological Survey Planning advice PA2023-17**

- 4.2.14 The purpose of this planning advice is to detail the requirements of a baseline ecological survey in order to allow a full assessment of the impact of a Proposed Development on both habitats and species but also the wider ecosystem services provided by the site.

### **Assessing Wind Energy Developments Planning advice PA2023-21**

- 4.2.15 This Planning Advice is designed for use by both Development Management officers and prospective applicants for all scales of new wind turbines, repowering proposals, and extensions to existing wind energy sites. It also considers ancillary development and energy (battery) storage forming part of a wind energy development. PA2023-21 reflects changes following the production of NPF4.

## **4.3 Material Considerations**

- 4.3.1 This section of the Planning Statement sets out the relevant wider material considerations for the Proposed Development.

### **Scottish Government Planning Advice**

- 4.3.2 The Scottish Government produce Planning Advice Notes (PANs) and online advice which provide advice on planning matters. The PANs and Scottish Government online advice considered relevant to the Proposed Development are:

- Flood risk: planning advice published 22 June 2015.
- Onshore wind turbines: planning advice 28 May 2014.
- Hydro schemes: planning advice Published 12 December 2013
- Energy storage: planning advice last updated 12 December 2013.
- Transport Assessment guidance published March 2012.

- PAN 2/2011: Planning and archaeology published July 2011
- PAN 1/2011: planning and noise published 3 March 2011.
- PAN 3/2010: community engagement published 31 August 2010.
- PAN 79: water and drainage published 27 September 2006.
- PAN 75: planning for transport published 15 August 2005.
- PAN 68: design statements published 18 August 2003.
- PAN 60: natural heritage published 1 January 2000.

## Climate Emergency, Carbon and Energy Legislation Policy and Targets

4.3.3 This section of the Planning Statement outlines the climate emergency declared by the Scottish Government. It sets out the legal framework for Net Zero carbon emissions within the UK and Scotland and provides a high-level review of some of the most recent publications from the UK and Scottish Governments. It is evident that the planning system has a key role in delivering Net Zero and the energy policy commitments. This is clearly evidenced in NPF4.

4.3.4 The Scottish Government Programme for Government 2023-24 published in September 2023 states on page 21 that the Scottish Government aims to:

*“Develop a Green Industrial Strategy, setting out how we will help businesses and investors to realise the enormous economic opportunities of the global transition to net zero and create good, well-paid jobs across Scotland in sectors such as offshore wind and hydrogen, and support the development of sectoral Just Transition Plans.”*

### Climate Emergency

4.3.5 In May 2019, the Scottish Government declared a climate emergency. At the same time, in Westminster, the Environment Secretary acknowledged a climate change emergency. In a speech to the Scottish Parliament the Climate Change Secretary stated:

*“The Climate Change Committee has been stark in saying that the proposed new targets will require “a fundamental change from the current piecemeal approach that focuses on specific actions in some sectors to an explicitly economy wide approach”. To deliver the transformational change that is required, we need structural changes across the board: to our planning, procurement, and financial policies, processes and assessments. And as I’ve already said, that is exactly what we will do.”*

4.3.6 The Climate Change (Scotland) Act 2009 was amended by the Climate Change (Emissions Reduction Targets) (Scotland) Act 2019, increasing the ambition of Scotland’s emissions reduction targets to net zero by 2045 and revising interim and annual reduction targets.

## Climate and Renewable Energy Framework

- 4.3.7 The Climate Change (Emissions Reduction Targets) (Scotland) Act 2019 was passed by the Scottish Parliament in 2019 and its measures were brought into force in March 2020. It amends the Climate Change (Scotland) Act 2009 and sets targets to reduce Scotland's emissions of all greenhouse gases to net zero by 2045 at the latest, with interim targets for reductions of at least 56% by 2020, 75% by 2030, 90% by 2040. The interim target of 75% by 2030 requires the current decade to be a transformative one. It also provides annual targets, which are not currently being met.
- 4.3.8 The Proposed Development is being brought forward in an environment where the need for renewable energy is critical to reach the greenhouse gas emission reduction targets set by law and the renewable energy generation targets set by the Scottish Government.
- 4.3.9 Also, the importance of energy security and affordability has been heightened by recent geopolitical events.

## Draft Energy Strategy and Just Transition Plan

- 4.3.10 One of the most recent documents is the Draft Energy Strategy and Just Transition Plan (DESJTP) which was published for consultation on 10 January 2023. Whilst this is not formal energy policy, given it has not been adopted, it still indicates the direction of future policy and reinforces the need to meet targets. The Ministerial Foreword states:

*“The evidence has never been stronger on the need for transformation of our energy system. We are publishing this draft Energy Strategy and Just Transition Plan at a time of unprecedented uncertainty and change in global and national energy systems. The imperative is clear: in this decisive decade, we must deliver an energy system that meets the challenge of becoming a net zero nation by 2045, supplies safe and secure energy for all, generates economic opportunities, and builds a just transition.”*

- 4.3.11 The Scottish Government are continuing to work through the details of the analysis and plan to publish the final version of the Energy Strategy and Just Transition Plan by Summer 2024.
- 4.3.12 The plan states that are:

*“There are tremendous opportunities ready to be seized over the coming years as our renewables capabilities and wider supply chains grow. As one of the cheapest forms of electricity, offshore wind has a vital role to play in decarbonising our energy demand and securing a just transition to net zero”.*

## Onshore Wind Policy Statement

- 4.3.13 The Onshore wind policy statement was published by the Scottish Government in December 2022 and sets out the ambitions for delivering onshore wind in Scotland.
- 4.3.14 In relation to the security of supply and storage potential and role of onshore wind, paragraph 8.4.4 of the OWPS states:

*“These include the potential of co-location with hydrogen electrolyzers. The renewable hydrogen produced from such processes can serve a number of highly valuable purposes; in addition to greatly reducing network constraint payments and costs, the renewable hydrogen*

*produced could help meet demand for zero carbon heat and transport as well as being used to generate electricity and provide vital flexibility at key strategic locations on the network.”*

4.3.15 Paragraph 8.4.6 states that:

*“The Scottish Government will continue to support the co-location of both battery storage and hydrogen production facilities with onshore wind developments to help balance electricity demand and supply, add resilience to the energy system and support the production of renewable hydrogen to meet our future demands.”*

4.3.16 The OWPS confirms the important relationship between hydrogen and wind energy and states that:

*“We see the growth of renewables and a hydrogen economy as complementary; we need a strong renewables sector to support the development of a range of small and large scale renewable hydrogen projects.”*

4.3.17 The OWPS also refers to the Hydrogen Action Plan as detailed above and confirms that:

*“The Action Plan is supported by a £100m capital funding programme, designed to accelerate and maximise the production of renewable hydrogen in Scotland to meet our target of 5 GW of renewable and low carbon hydrogen production by 2030 and 25 GW by 2045.”*

## 5 PLANNING ASSESSMENT

### Introduction

5.1.1 Planning applications are legally required to be determined in accordance with the Development Plan unless material considerations indicate otherwise.

5.1.2 This chapter of the Planning Statement outlines the principle of the Proposed Development (wind turbine and associated infrastructure) and assesses it against the relevant provisions of the Development Plan and material considerations.

5.1.3 The chapter draws upon the outcomes of the technical and environmental reports which accompany this application and therefore the following section cross references these reports to assess against the Proposed Development.

## 5.2 Principle of Development

5.2.1 The Proposed Development subject to this application is for operational development that would produce renewable energy. It is considered that the policies supporting the principle of the development in the NPF4 are:

- Policy 1: Tackling the Climate and Nature Crises
- Policy 2: Climate Mitigation and Adaptation
- Policy 11: Energy
- Policy 29: Rural Development

- 5.2.2 NPF4 Policy 1 is an overarching policy that gives significant weight to the global climate emergency to ensure that it is recognised as a priority in all plans and decisions. The NPF4 specifically states:
- “When considering all development proposals significant weight will be given to the global climate and nature crises”.*
- 5.2.3 NPF4 Policy 2 encourages development proposals that minimise emissions and adapt to the current and future impacts of climate change.
- 5.2.4 NPF4 Policy 11 supports all forms of renewable energy development.
- “To encourage, promote and facilitate all forms of renewable energy development onshore and offshore. This includes energy generation, storage, new and replacement transmission and distribution infrastructure and emerging low-carbon and zero emissions technologies including hydrogen and carbon capture utilisation and storage (CCUS).”*
- 5.2.5 The wording in NPF4 specifically states that the Local Development Plans should realise their area’s potential for electricity and heat derived from renewable, low-carbon, and zero-emission sources by exploring various opportunities for energy development.
- 5.2.6 Development for all forms of renewable energy, low-carbon and zero emissions technologies will be supported - this includes, wind farms, energy storage, such as battery storage, small scale renewable energy generation technology and solar arrays will only be supported provided where they maximise net economic impact, local and community socio-economic advantages like employment, related business opportunities, and opportunities within the supply chain.
- 5.2.7 At Policy 11(d) the NPF4 indicates that proposals for wind farms in National Parks and National Scenic Areas will not be supported. However, outwith these designations, there is general support where the effects are localised, and appropriate design mitigation has been applied and there is recognition that significant landscape and visual impacts are “to be expected”.
- 5.2.8 NPF4 Policy 29 encourages economic activity, innovation and diversification in rural setting providing that the unique character of the rural area, the functional role of small towns, natural assets, and cultural heritage are safeguarded and enhanced. Specifically, development proposals that enhance the resilience and the diversification of the working farms providing that the main business outputs are not adversely affected by the development are supported.

## **Aberdeenshire Local Development Plan**

- 5.2.9 ALDP Policy C2: Renewable Energy within the Aberdeenshire Local Development Plan provides support for proposals related to the development of renewable energy.
- 5.2.10 ALDP Policy C2.1 states that the authority will support renewable energy development including solar and wind providing that assessments are undertaken that would address significant planning considerations and assess the impact that the development may have on the surrounding landscape. These considerations include landscape and visual aspects, natural heritage, and the historic environment and the amenity of those living in the surrounding area.



- 5.2.11 ALDP Policy C2.2 states wind energy developments in appropriate locations will be supported. ALDP Policy C2.3 states that wind farms must be appropriately sited and designed and avoid unacceptable environmental effects, taking into account the cumulative effects of existing and approved wind turbines.
- 5.2.12 ALDP Policy C2.4 specifically sets out that turbines must not compromise health and safety or adversely affect aircraft or airfields (including radar and air traffic control systems, flight paths and Ministry of Defence low flying areas) and/or telecommunications. Unacceptable significant adverse effects on the amenity of dwellinghouses, such as from noise, or on tourism and recreation interests including core paths and other established routes used for public walking, riding or cycling, or to protected species should also be avoided.
- 5.2.13 ALDP Policy R2 relates to Development Proposals Elsewhere in the Countryside. Policy R2.2 states that small-scale development would be permitted where the proposals align with the requirements of the green belt development as set out in R1.2 (Policy R1 Special Rural Area). Development will be permitted only in exceptional circumstances where it can satisfy at least one of the following requirements:
- Development associated with agriculture, woodland and forestry, fishing and horticulture;
  - Development for a recreational use that is compatible with its agricultural or natural setting;
  - The development of single huts not associated with a tourist proposal under Policy B3 Tourist Facilities will be prohibited; development meeting a national requirement or established need, if no other suitable site is available;
  - Intensification of an established use subject to the new development being of a suitable scale and form;
  - Accommodation within the immediate vicinity of the place of employment required for a worker in a primary industry, where the presence of a worker is essential to the efficient operation of the enterprise, and there is no suitable alternative residential accommodation available; and
  - Essential infrastructure such as digital communications infrastructure and electricity grid connections.
- 5.2.14 In this case the Proposed Development is associated with agriculture. The Proposed Development is essential to support the existing farm to move to renewable energy use instead of fossil fuel use and would be used to demonstrate how farming and other rural communities can become self-reliant, low-carbon energy producers and exporters, generating 100%+ of their energy requirements (electricity, heating, and transport) through a combination of renewable electricity and green hydrogen production.
- 5.2.15 In summary, there is substantial support for the principle of the Proposed Development within both the NPF4 and the ALDP. Both policy documents, however, recognise that the principle of renewable energy development proposals are supported provided that a thorough evaluation of their impact on other relevant planning considerations has been assessed.

- 5.2.16 The following chapter considers the outcomes of the technical and environmental reports which accompany this application and assess the Proposed Development in relation to the other policy requirements.

## 5.3 Design

- 5.3.1 Policy P1 Layout, Siting and Design is primarily geared towards residential development. Wind turbines are functional in design and appearance and the only design considerations relate to location and size. The turbine's location has been informed by the presence of a suitable wind resource, the site's availability in terms of the delivery of turbine components, its limited ecological value and remoteness from residential properties to avoid issues of noise or shadow flicker. The size of the turbine has been dictated by the energy demand of the farm and associated households. Modelling demonstrated that the mix of wind and solar on site would provide enough energy to meet the site's demand, along with the energy stored in the BESS. Special consideration was therefore given to the proportionate sizing of the turbine for landscape capacity, capacity of local road network and the required energy needs of Glensaugh Farm and its residential properties.
- 5.3.2 Given the application of the design consideration set out above, both in relation to turbine location and size, it is concluded that the development is in accordance with ALDP Policy P1.

## 5.4 Landscape and Visual Impacts

### Introduction

- 5.4.1 The application site and its immediate surrounds are located within the LCT 29: Summits and Plateaux – Aberdeenshire Landscape Character Type (LCT) and the Braes of the Mearns Special Landscape Area (SLA). There are no National Scenic Areas (NSAs) or National Parks in the vicinity.
- 5.4.2 The Proposed Development would introduce new infrastructure into a landscape currently utilised for agricultural purposes and it is acknowledged that there would be some landscape and visual effects arising as a result.
- 5.4.3 A Landscape and Visual Impact Assessment (LVA) is submitted with the application. The assessment was undertaken by the Chartered Landscape Architects at Brindleys Associates LTD. This assessment defines the existing landscape and visual baseline environments; assesses their sensitivity to change and assesses the effects of the development arising during construction and once operational. The key findings are summarised below.

### Policy context

- 5.4.4 NPF4 Policy 11 supports renewable energy proposals recognising that development proposals may result in some landscape and visual impacts, recognising that such impacts are to be expected for some forms of renewable energy. Where impacts are localised and appropriate design mitigation has been applied, they will generally be considered to be acceptable.
- 5.4.5 ALDP Policy C2 encourages renewable energy proposals providing that they are on a scale and in a location that avoids significant landscape impacts. Specifically, ALDP policy C2.2 for wind energy states that energy developments will be approved in appropriate locations taking into account the spatial framework for wind turbine mapping. The site of the wind

turbine is sited in group 3 within this spatial framework. This is defined as an area with potential for the siting of wind turbines subject to detailed consideration.

- 5.4.6 ALDP C2.3 requires that all wind farms must be appropriately sited and designed and avoid unacceptable environmental effects, taking into account the cumulative effects of existing and approved wind turbines. All wind turbines sites must be appropriate for use in perpetuity at the scale being proposed.
- 5.4.7 ALDP Policy E2.1 states they will refuse any development that causes unacceptable effects through its scale, location or design on key characteristics, natural landscape elements, features or the composition or quality of the landscape character as defined in the Landscape Character Assessments produced by NatureScot. These impacts can be either alone or cumulatively with other recent developments.
- 5.4.8 ALDP Policy E2.2 specifically states that significant adverse impact Special Landscape Area will not be permitted unless it is adequately demonstrated that these effects are clearly outweighed by social, environmental or economic benefits of at least local importance.

## Assessment

- 5.4.9 In relation to landscape character, the application site and its immediate surrounds are located within the LCT 29: Summits and Plateaux – Aberdeenshire Landscape Character Type (LCT). The value of the landscape is high; the Proposed Development also falls within the Braes of the Mearns Special Landscape Area (SLA). A local landscape designation placed on an area that exhibits qualities and characteristics within them that are valued locally.
- 5.4.10 The LVA has concluded that the Proposed Development would change the character of the land within the application site near the submit of Loch Hill given the necessary landform modifications required to level and terrace the access road and hard standing associated with the turbine. This is because the landscape surrounding the Proposed Development is of high susceptibility to changes of the nature proposed, especially given the exposed nature and elevated position where the wind turbine would be erected.
- 5.4.11 The LVA has determined that the Proposed Development would result in some landscape and visual impacts with the most notable change being the potential additional visibility of the proposed single wind turbine. The LVA has concluded that the Proposed Development has the potential to result in some major adverse effects during the construction and operational stages on both the host landscape and the Braes of the Mearns Special Landscape Area.
- 5.4.12 Additionally, the Proposed Development would have major/moderate effects on visual receptors in the area given the location of the Proposed Development from identified key viewpoints, VP01a: Loch Saugh, VP02: Junction of Old Military Road and C-class road to Glensaugh and VP03: Cairn O Mount Viewpoint. The LVA has concluded that the turbine would appear as a standalone intervention and that recreational users are considered to be of a very high sensitivity to the Proposed Development given that value of the landscape, and key recreational routes around the application site, especially when viewed from Old Mains Military Road and Cairn O' Mount Road (B974).

## Summary

- 5.4.13 The LVA has found that the Proposed Development would result in a small number of major adverse effects that would affect the character and fabric of the landscape of the LCT 29: Summits and Plateaux – Aberdeenshire. Policy E2.1 relates to impacts on landscape character areas. The policy indicates that proposals will be refused where impacts on landscape are ‘unacceptable’. It is clear that the proposal would lead to some significant adverse effects on landscape over a limited area – the findings are summarised in tabular form in the LVA report (Tables 2-6). The determination of whether these effects are of such consequence as to be considered ‘unacceptable’ suggests that adverse effects need to be balanced against the benefits of the proposal which are discussed below.
- 5.4.14 The LVA has also concluded that Proposed Development would result in moderate effects on the Braes of the Mearns Special Landscape Area during construction and major adverse effects during its operation. The policy test set out in E2.2 is that development which has such effects will not be permitted unless it is adequately demonstrated that these effects are clearly outweighed by social, environmental or economic benefits of at least local importance.
- 5.4.15 The application of the policy tests of both E2.1 and E2.2 requires the decision maker to balance the harm to landscape against the benefits of the scheme. It is clear that the scheme would bring about demonstrable economic and sustainability benefits. It would bring about significant carbon reduction, reduced fossil fuel dependency and improved long term economic viability to support the existing farm, as well as a public-facing demonstration of the potential of renewable energy-green hydrogen to displace fossil fuel dependencies in rural areas (the funding for this facility was awarded by the Scottish Government’s Just Transition Fund). Given these benefits the proposal is not considered as being ‘unacceptable’ for the purposes of Policy E2.1 and that the limited landscape harms are clearly outweighed by these benefits in applying the tests of Policy E2.2. It follows that the proposal is in compliance with both ‘limbs’ of Policy E2.

## 5.5 Ecology and Biodiversity

### Introduction

- 5.5.1 An Ecological Impact Assessment has been undertaken by ITP Energised to identify potential ecological constraints to the proposed construction comprising a single turbine (with associated infrastructure including cabling and access road route).

### Policy Context

- 5.5.2 NPF4 outlines the duty of planning authorities to further the conservation of biodiversity as defined in the Nature Conservation (Scotland) Act 2004. It places climate and nature at the forefront of the planning system and includes a cross-cutting outcome to improve biodiversity.
- 5.5.3 NPF4 Policy 1 gives significant weight to the global climate and nature crises to ensure that they are recognised as a priority in all plans and decisions. NPF4 Policy 3 plays a critical role in ensuring that development will secure positive effects for biodiversity. It rebalances the planning system in favour of conserving, restoring and enhancing biodiversity and promotes nature-based solutions, benefiting people and nature. This policy intends to protect

biodiversity, reverse biodiversity loss, deliver positive effects from development and strengthen nature networks.

- 5.5.4 This is further supported by ALDP Policy E1 that states that new development will not be supported where it may have an unacceptable adverse effect on a nature conservation site designated for its biodiversity, species, habitat, or geodiversity.

### **Assessment**

- 5.5.5 A number of ecological surveys have been undertaken to inform this assessment and to inform the decision-making process in relation to turbine positioning and access track route, followed by targeted species-specific surveys as required.
- 5.5.6 The site of the proposed wind turbine on Loch Hill comprises a mosaic of heathland and acid grassland habitats. The access route slopes steeply downhill to the south and the surrounding land is divided into strips of relatively flat grassland used to graze sheep, cattle and deer interspersed with areas of steeply sloping banks, covered in bracken, enclosed by stock and deer fences.
- 5.5.7 The assessment has identified that most of the site comprises habitats of limited ecological value including modified grassland and developed land which are species poor and are not protected nor are identified as priority habitats.
- 5.5.8 The upland heathland and acid grassland mosaic where the turbine, associated hardstanding and access road are proposed are, however, identified as being of higher ecological value and align with Scottish Biodiversity List priorities.
- 5.5.9 The ecological assessment has determined that the Proposed Development would lead to the direct loss of a small area of Upland heathland (h1b) and acid grassland (g1) mosaic during the construction phase of the project. The construction and placement of the turbine, hardstanding, access road, and cabling route are expected to have direct effects on this specific habitat, resulting in the loss of 0.57 ha of upland heathland/acid grassland mosaic habitat. Additionally, it is anticipated that the project will impact a buffer zone extending up to 5 metres from the footprint of the access road and a 20-metre buffer around the turbine, totalling 1.06 ha.
- 5.5.10 Consequently, in total, c. 1.63 ha of upland heathland / acid grassland mosaic may be directly impacted which equates to 8.44% of the habitat recorded within the study area identified as part of the ecological assessment.
- 5.5.11 The ecological assessment has, however, concluded that due to the relatively small footprint of the development, the loss of this habitat will not impact the structural integrity or functionality of this habitat. The impact of the Proposed Development on the identified habitat overall is therefore deemed to be low.
- 5.5.12 All potential negative impacts upon the specific habitat that may arise during the construction and operational phases of the project are subject to proposed controls and mitigation measures, such as micro siting the access road and cabling route works to follow the route of the existing access track as far as possible. These measures are detailed in the ecological assessment and the submitted Construction and Environmental Management Plan (CEMP).

## Biodiversity Net Gain

- 5.5.13 There is specific wording in ALDP Policy P1 that requires all developments to identify measures that will be taken to enhance biodiversity in proportion to the potential opportunities available and the scale of the development. In circumstances when it is not practical to deliver positive effects for biodiversity within a development site, off-site contributions towards biodiversity enhancement within the settlement or near to the site will be required. In this case such measures may be secured by planning obligations or conditions.
- 5.5.14 NatureScot have produced guidance on securing positive effects for biodiversity from local development to support NPF4 policy 3(c). An outline Biodiversity Enhancement Plan (OBEP) has been prepared with reference to the above guidance.
- 5.5.15 The OBEP sets out measures to improve the biodiversity within the Site and includes heathland restoration, native tree and scrub planting, the creation of a species-rich grassland/meadow by the enhancement of existing species-poor grassland within an area of approximately 4.27ha (Brae field) which lies to the west of the Glensaugh Farm complex, and the addition of bird and bat boxes. The production of a Biodiversity Enhancement Plan (BEP) will be a condition of any approval for the Proposed Development.

### Summary

- 5.5.16 The results of the survey have concluded that the Proposed Development would result in the loss of a small area of habitat, but, due to the relatively small footprint of the Proposed Development, the loss of this habitat would not impact its structural integrity or functionality. The impact of the Proposed Development on the identified habitat overall is therefore deemed to be low. The production of a Biodiversity Enhancement Plan (BEP) would ensure biodiversity enhancements across the site .
- 5.5.17 The ecological assessment has concluded that the Proposed Development would not have an unacceptable adverse effect on nature conservation sites. Additionally, Biodiversity net gain mitigation measures are proposed in the OBEP to enhance biodiversity. These will be set out in detailed Biodiversity Enhancement Plan (BEP) for the wider Glensaugh Farmstead. As such the Proposed Development proposed would be in accordance with ALDP Policy E1 and ALDP Policy P1.

## 5.6 Archaeology and Cultural Heritage Assets

### Introduction

- 5.6.1 An Environmental Appraisal that specifically focuses on the impact of development concerning the historical environment has been undertaken by CFA Archaeology. The appraisal sought to identify archaeological features within the vicinity of the Proposed Development, assess the wider site in terms of its archaeological and cultural heritage, make an assessment on the potential of the archaeological remains to be impacted by the Proposed Development, against the context of the relevant legislation and planning policy guidelines.
- 5.6.2 The Archaeology and Cultural Heritage report has been divided into two sections. The inner study area which identifies any heritage assets, both those previously recorded on the historic environment record and on other designation lists, and those identified through the

desk-based assessment, that could be directly impacted by the Proposed Development and the outer study area, a wider study area, extending to 5 km from the proposed turbine location. The wider study area was used to identify both statutory and non-statutory heritage designations that could have their settings affected by the development proposed.

### Policy Context

5.6.3 NPF4 Policy 7 requires that the historic environment is valued, protected, and enhanced, supporting the transition to net zero and ensuring assets are resilient to current and future impacts of climate change.

5.6.4 The NPF4 7(h) states that:

*‘Development proposals affecting scheduled monuments will only be supported where:*

- i. direct impacts on the scheduled monument are avoided;*
- ii. significant adverse impacts on the integrity of the setting of a scheduled monument are avoided; or*
- iii. exceptional circumstances have been demonstrated to justify the impact on a scheduled monument and its setting and impacts on the monument or its setting have been minimised.’*

5.6.5 This is further supported by ALDP Policy HE1. The policy states:

*“We will resist development that would have an adverse impact on the character, integrity or setting of listed buildings, or scheduled monuments, or other archaeological sites. If adverse impact is unavoidable, it should be minimised and justified”.*

*“Development on nationally or locally important monuments or archaeological sites or having an adverse impact on the integrity of their setting, will only be allowed if there are exceptional circumstances, including those of a social or economic nature, and there is no alternative site.”*

### Assessment

#### *Assessment of Heritage Assets*

5.6.6 The land where the wind turbine is proposed encompasses an expanse of upland moorland and grassland along with improved pasture farmland through which the routes of the access track and cable passes.

5.6.7 The desk-based assessment and walkover survey both concluded that the heritage assets within the study area are of postmedieval date and relate to farming and livestock management and the creation of Loch Saugh reservoir and dam.

5.6.8 The report has identified that the route of the access track and cable for the proposed turbine would pass close to the area of Cleek farmstead. This is a non-designated heritage asset, of local heritage value and of low sensitivity described in the historic record as:

*“The remains of the farmstead, comprising at least one rectangular building, banks and a circular feature to the south of a lochan and two rectangular buildings to the north.”*

5.6.9 These buildings are located to the north and south of a small lochan, approximately 30 m to the east of the existing track, and beyond an existing substantial deer fence. The Proposed Development would use the existing access track and would be approximately 30 m from the recorded buildings and structures within this farmstead. It is therefore considered that any construction impact would be negligible and archaeological features would be preserved.

5.6.10 Considering the current land-use and the evidence for occupation and settlement, it is assessed that there is low to moderate potential for previously undiscovered archaeological remains to be present within the turbine area and along the proposed access track and cable route.

*Impact on the Setting of Heritage Assets*

5.6.11 A tabulated assessment of the impact of the Proposed Development in relation to the setting designated heritage assets has been provided in the desk-based assessment. This assessment has undertaken an analysis of the ZTV (Zone of Theoretical Visibility) showing the extent of visibility of the Proposed Development in relation to the setting of the designated heritage assets.

5.6.12 Two of the heritage assets of high national importance have the greatest potential to be affected by the siting of the proposed wind turbine. These are Cairn o' Mount Cairns (SM 4968) located approximately 2.8km north-east of the proposed turbine and Glensaugh, farmstead and field system located 1.4km to the south-west of the turbine.

*Cairn o' Mount Cairns*

5.6.13 Cairn o' Mount, cairns (SM 4968) comprise the remains of two burial cairns of late Neolithic or early Bronze Age date. The cairns are located in a prominent topographic position on high ground alongside the B974, Fettercairn to Banchory road. From the cairns, there are wide panoramic views over the surrounding landscape and in particular there are long-range views to the south and southeast, looking down onto the Howe of Mearns.

5.6.14 Within the wider views of the surrounding landscape, views from these cairns already encompass the Mid Hill Wind Farm, situated roughly 6.8 km to the north-east of the cairn. Additionally other wind farms can be observed from the cairn, particularly on the lower-lying terrain of the Howe of Mearns to the south.

5.6.15 In this case, as a single wind turbine located to the south-west of the Scheduled Monument, it would not affect the key views from the cairns to the south and south-east, out over the Howe of Mearns nor would it affect the views northwards from the cairns through the hills and towards the Dee valley. Furthermore, the turbine would not be located within the key views towards the cairns from the surrounding land lower ground levels.

5.6.16 In summary, the position of the Proposed Development, whilst visible, would not adversely affect the integrity of the cairns' setting and the Proposed Development would have a low magnitude of change. would not adversely affect the integrity of the cairns' setting and it would remain possible to understand, appreciate and experience the cairns and their wider setting. As such, the impact of the Proposed Development on the setting of Cairn o' Mount cairns is assessed as being one of negligible magnitude. The cultural significance of the cairns, as a prominent prehistoric funerary asset and landmark with archaeological potential to inform our understanding of the funerary and ritual activities in the Bronze Age, would not be diminished by the presence of the Proposed Development.



### *Glensaugh, farmstead and field system*

- 5.6.17 Glensaugh, farmstead and field system (SM 4842) comprises the remains of a historic farmstead and its associated field system and lies 1.4 km to the south-west of the proposed turbine. The farmstead comprises the remains of three main buildings and a corn drying kiln, as well as the turf footings of two earlier buildings and contemporary walls and enclosures, set within an area of associated field systems.
- 5.6.18 Again, in this case the turbine would be visible from part of the Scheduled Monument. The assessment has concluded that the given the position on the turbine on the hills to the northeast at a higher topographical level the Proposed Development would not adversely affect the localised setting of the farmstead on the hillside above Glen Saugh. The proposed turbine, while visible on the hills to the northeast, would not adversely affect the integrity of its localised setting and it would remain possible to understand, appreciate and experience the remains of the farmstead in its setting in its localised setting on the hillside above Glen Saugh. As such, the impact of the Proposed Development on the setting of Glensaugh farmstead is assessed as being one of low magnitude.

### **Summary**

- 5.6.19 In relation to Proposed Development and considering the current land-use and the evidence for occupation and settlement, it is assessed that there is limited potential for previously undiscovered archaeological remains to be present within the turbine area and along the proposed access track and cable route. The assessment has found that there are likely to be adverse impacts of no greater than low magnitude on the settings of designated heritage assets in the local area as a result of the proposed turbine.
- 5.6.20 Both national and local policy require justification set out where Proposed Development may have adverse impact on the integrity of their setting of Scheduled Monuments, adverse impact should be minimised and justified.
- 5.6.21 The proposed location of the turbine has been informed by a number of factors. Its position on Loch Hill serves to exploit a suitable wind resource. The site also limits difficulties with the delivery of turbine components which would be associated with other more remote locations. The proposed site has limited ecological impact in relation to other locations and is removed from residential properties avoiding issues associated with the noise generated by turbines and shadow flicker. The size of the turbine has been driven by the energy demand of the farm and associated households. The modelling carried out showed that the mix of wind and solar on site would provide enough energy to meet the site's demand, along with the energy stored in the BESS.
- 5.6.22 Therefore, it is considered that the impact on the setting of the Scheduled Monuments is low to negligible and has been minimised and justified through the selection of the site and size of turbine. The Proposed Development is therefore considered compliant with NPF4 Policy 7 and ALDP Policy HE1.

## **5.7 Noise**

### **Introduction**

- 5.7.1 This section considers the potential noise impacts associated with the operation of the Proposed Development. A Noise Impact Assessment has been carried out by ITP Energised. The Assessment has assessed the baseline noise environment by survey, predicted

operational noise levels from the Proposed Development and evaluated the predicted levels in accordance with the relevant guidance.

### **Policy Context**

- 5.7.2 NPF4 Policy 11 requires that project design and mitigation will demonstrate how impact on communities and individuals in terms of noise will be assessed.
- 5.7.3 ALDP Policy C2.3 requires that all wind farms must be appropriately sited and designed and avoid unacceptable environmental effects, taking into account the cumulative effects of existing and approved wind turbines.
- 5.7.4 ALDP Policy C2.4 states '*Unacceptable significant adverse effects on the amenity of dwellinghouses, such as from noise, or on tourism and recreation interests including core paths and other established routes used for public walking, riding or cycling, or to protected species should also be avoided.*
- 5.7.5 Additionally, Aberdeenshire Council provides supplementary planning guidance 'Assessing Wind Energy Developments – Planning advice PA2023-21 in relation to onshore wind development. This SPG reflects changes following guidance in NPF4.

### **Assessment**

#### *Study area and findings*

- 5.7.6 In the case of the wind turbine, the study area for a wind farm or individual wind turbine Generator (WTG) involves predicting the 35 dBLA90 noise contour. Locations outside this contour are presumed to already adhere to the strictest ETSU R 97 noise limit, leading to their exclusion and dismissal from further evaluation. Sites within the 35 dBLA90 noise contour are included in the scope, and their noise impacts are subsequently examined in greater detail.
- 5.7.7 In this case the adopted study area shows that there are no residential properties or other noise sensitive receptors (NSR) within the 35 dBLA90 noise contour. The closest NSRs outside the applicant ownership are NSR2 and NSR3 (No 2 Cottage, located on the north side of the road immediately opposite the farm entrance and Old Lodge to the west of the access road) and as demonstrated within the report are outside the 35 dBLA90 noise limit.
- 5.7.8 As such, given the position of the proposed wind turbine and the location of the NSRs it has been concluded that there are no NSRs that would be adversely affected by the Proposed Development in terms of noise.

#### *Cumulative effect*

- 5.7.9 There is an existing single 50 kW wind turbine within the applicant's ownership located to the south of the proposed wind turbine subject to this application. A planning condition on the 2009 application specified a noise limit of 45 dBLAeq, 5 min at the nearest house.
- 5.7.10 There are no other developments that have been identified in the nearby vicinity that would create a cumulative effect.
- 5.7.11 At the nearest noise sensitive receptors (outside the application boundary) the predicted noise levels are more than 10dB below the consented noise level for the existing wind

turbine and as such it is concluded that no cumulative effects will occur as a result of the new wind turbine.

### **Summary**

- 5.7.12 In summary, the Proposed Development would not impact on the amenity of neighbours in respect of noise impacts. The assessment has also considered the potential cumulative effects with the existing small turbine currently operated by The James Hutton Institute and has found these to be not significant.
- 5.7.13 In summary the Proposed Development has been found to be acceptable in relation to noise and would not affect the impact on communities and individuals in terms of noise. No significant adverse effects on the amenity of dwellinghouses from noise has been identified. The Proposed Development is therefore found to be acceptable in relation to ALDP Policy C2 and NPF4 11.

## **5.8 Shadow Flicker**

### **Introduction**

- 5.8.1 This section considers shadow flicker, which is an effect caused by the rotation of the turbine blades when the sun is shining, which can create a flickering or strobe like effect. It can be distracting and disturbing for people who are affected.
- 5.8.2 The pre-application advice issued by Aberdeenshire Council (21 December 2022) included a response stating that a shadow flicker assessment was required the development to consider properties at a distance of 10 x the diameter of the turbine blades.

### **Policy Context**

- 5.8.3 NPF4 Policy 11 requires impacts on communities and individual dwellings, including ... shadow flicker to be assessed.

### **Assessment**

- 5.8.4 Potential for shadow flicker impacts has been assessed at all residential receptors within the shadow flicker study area. The shadow flicker study area includes the area within a distance of 10 times the rotor diameter and 130 degrees either side of north for each turbine. As the nearest residential receptor is approximately 1.4 km south of the turbine location the Proposed Development is not expected to cause any shadow flicker impacts on residential receptors.

### **Summary**

- 5.8.5 As such no impacts are anticipated that would impact on the residential receptors. The Proposed Development is therefore considered to be acceptable in relation to residential receptors in accordance with NPF4 Policy 11.

## 5.9 Transport and Access

### Introduction

- 5.9.1 This section provides details on the Proposed Development in relation to construction and operational traffic and evaluates the impact of the Proposed Development on the local road network and outlines suggested measures to be implemented at the site. A combined Transport Statement and Construction Traffic Management Plan (CTMP) has been prepared by Pell Frischmann. The assessment presents a worst-case scenario that the turbine would be an EWT DW61 on a 50metre hub to assess the impact of the Proposed Development in relation to abnormal loads. The likely turbine would be much smaller than the model the transport assessment has considered.

### Policy Context

- 5.9.2 NPF4 Policy 11 states that development proposals for all forms of renewable, low-carbon and zero emissions technologies will be supported where project design and mitigation will demonstrate how the impacts on road traffic and on adjacent trunk roads, including during construction, will be addressed.
- 5.9.3 *ALDP Policy C2 states that the assessment of the acceptability of such developments will take account of any effects ...on road traffic.*
- 5.9.4 Use of Wind Energy in Aberdeenshire: Guidance for Developers – Supplementary Planning Guidance (2005). In relation to transportation, the supplementary guidance document states that: *“consideration should be given to potential cumulative impact on ... traffic and transport...”*

### Assessment

- 5.9.5 The wind turbine would be accessed from a separate already existing access junction (proposed to be modified slightly to assist large vehicles turning in) which is approximately 950m along the road from the farm access, to the north / north-east.
- 5.9.6 The transport assessment has concluded that the construction traffic associated with the Proposed Development would result in a temporary increase in traffic flows on the road network surrounding the Proposed Development. However, there would still be significant spare capacity within the road network. It is concluded that the traffic associated with the operational phase of the Proposed Development would have a minimal effect on the road network. It is therefore concluded that there are no transport related matters which would preclude the construction and operation of the Proposed Development site. Moreover, the assessment has considered a larger turbine than the one currently proposed. It has determined that both the site and the adjacent road infrastructure can accommodate oversized loads. The assessment has confirmed the feasibility of installing a turbine significantly larger than the one intended for purchase and installation on the site.

### Summary

- 5.9.7 The Transport Statement submitted as part of the application concludes that the Proposed Wind Turbine Development would have a negligible impact on the local road network and the existing strategic road network has sufficient capacity. In summary it is considered that there are no anticipated impacts on the traffic flows on the road. The Proposed Development is

therefore considered acceptable in relation to ALDP Policy C2 and NPF4 Policy 11 and NPF4 Policy 22.

## 5.10 Flood Risk and Drainage

### Introduction

- 5.10.1 This section assesses potential flood risk of the Proposed Development from all possible sources in accordance with best practice and in accordance with guidance presented within NPF4. A Flood Risk and Drainage Assessment (FRDA) has been prepared by Pell Frischmann.

### Policy Context

- 5.10.2 Policy 22 of NPF4 ensures that future flood risk is not exacerbated by development, and facilitates the delivery of sustainable flood risk management solution. It provides direction on the type of developments that may be supported in area at flood risk, providing certain criteria are met by the applicant.
- 5.10.3 This is further supported by ALDP Policy C4 that requires Flood Risk Assessments should be undertaken in accordance with SEPA Technical Flood Risk Guidance.

### Assessment

- 5.10.4 Due to its elevated position the wind turbine is not included within the assessment.
- 5.10.5 The report has concluded that given the location of the site in Flood Risk Zone 1, it can be reasonably concluded that the proposal will not cause or increase the risk of flooding elsewhere and therefore the Proposed Development proposed is acceptable in relation to flood risk.
- 5.10.6 Additionally, energy generation and storage uses such as the one proposed are considered to comprise 'essential infrastructure' in accordance with SEPA's Land Use Vulnerability Classification. Essential infrastructure is generally permitted within most flood risk categories.

### Summary

In summary the Proposed Development would not cause or increase the risk of flooding at the site or elsewhere as such the Proposed Development is acceptable in relation to flood risk and satisfies NPF4 Policy 22 and Policy C4 of the ALDP.

## 6 THE PLANNING BALANCE

- 6.1.1 The table below provides summary of the assessment of the Proposed Development against the relevant policies of NPF4 and ALDP.

**Table 6.1 Summary of Policy Compliance**

Policy topic and reference number	Is the development in compliance with policy?
NPF4 Policy 1	<p><b>Yes.</b> The Proposed Development is a renewable energy scheme and would be contributing towards climate change targets and providing biodiversity enhancements which would help to respond to the nature crisis. It is therefore considered the Proposed Development is in accordance with Policy 1.</p>
NPF4 Policy 2	<p><b>Yes.</b> The Proposed Development would assist in minimising emissions and so be part of the adaption to the current and future impacts of climate change. It is therefore considered the Proposed Development is in accordance with Policy 2.</p>
NPF4 Policy 4	<p><b>Yes.</b> The Proposed Development would not have an unacceptable impact on the natural environment. The Ecological Impact Assessment provided has identified. Specific measures to improve biodiversity at Glensaugh Farm are proposed. It is therefore considered the Proposed Development is in accordance with Policy 4.</p>
NPF4 Policy 7	<p><b>Yes.</b> The nature of the Proposed Development would lead to impacts of no greater than low magnitude on the settings of designated heritage assets in the local area: it is considered that the Proposed Development would not compromise the setting of any assets and it would remain possible to understand, appreciate and experience them and their settings. The policy requires that where there is some adverse impact on a Scheduled Monument, justification should be provided to explain how the impact on a Scheduled Monument and its setting have been minimised. In this case, it is considered the reasons for the siting of the Proposed Development have been justified. The Proposed Development is therefore considered acceptable in relation to NPF4 Policy 7.</p>
NPF4 Policy 11	<p><b>Yes.</b> Development proposals for all forms of renewable, low-carbon and zero emissions technologies will be supported providing project design and mitigation measures are provided.</p> <p>In this case the assessments have concluded that there would be no impact on individual dwellings, including residential amenity, visual impact, noise and shadow flicker given the position of the Proposed Development which would be located on Loch Hill, within the Glensaugh Estate.</p> <p>In terms of noise, the Noise Impact Assessment has concluded that the adopted study area shows that there are no residential properties or other noise sensitive receptors (NSR) within the 35 dBLA90 noise contour.</p> <p>In terms of shadow flicker, as the nearest residential receptor is approximately 1.4 km south of the turbine location the Proposed Development is not expected to cause any shadow flicker impacts on residential receptors.</p> <p>In terms of landscape, the policy recognises there may be some limited adverse landscape and visual impacts given the nature of the Proposed Development. However, the policy recognises that such impacts are to be expected for some forms of renewable energy. Where impacts are localised and/ or appropriate design mitigation has been applied, they will generally be considered to be acceptable.</p>

Policy topic and reference number	Is the development in compliance with policy?
	<p>In this case the impact of the Proposed Development on the landscape is localised and the justification for why the development needs to be in this location has been provided. It is therefore considered that the Proposed Development is in accordance with NPF4 Policy 11.</p>
NPF4 Policy 22	<p><b>Yes.</b> Due to its elevated position the wind turbine is not included within the flood risk assessment that has been provided. It is therefore considered that the Proposed Development is in accordance with NPF4 Policy 22.</p>
NPF4 Policy 23	<p><b>Yes.</b> The Proposed Development has been found to be acceptable in relation to noise. No significant adverse effects on the amenity of dwellinghouses from noise has been identified.</p>
NPF4 Policy 29	<p><b>Yes.</b> The principle of the Proposed Development in a rural area is acceptable and in compliance with Policy 29</p>
ALDP Policy C2	<p><b>Yes.</b> The proposed wind turbine and associated infrastructure has been appropriately sited and designed. The policy recognises that the principle of renewable energy development proposals is supported provided that a thorough evaluation of their impact on other relevant planning considerations has been assessed. These are discussed in their specific policy sections set out below. The Proposed Development is therefore considered to be acceptable in relation to Policy C2.</p>
ALDP Policy C4	<p><b>Yes.</b> Due to its elevated position the wind turbine would not cause or increase the risk of flooding at the site nor elsewhere. It is therefore considered that the Proposed Development is in compliance with Policy C4</p>
ALDP Policy P1	<p><b>Yes.</b> The proposed wind turbine is functional in its design and appearance. Its size has been driven by the energy demand of the farm and its location by wind resource, availability for delivery of turbine components, distance from residential properties and ecological considerations.</p> <p>An outline Biodiversity Enhancement Plan (OBEP) has been prepared that sets out measures to enhance biodiversity at the Glensaugh Research Farm. It is therefore considered that the Proposed Development is in accordance with Policy 1.</p>
ALDP Policy R2	<p><b>Yes.</b> The policy requirements state that Proposed Development in the countryside will be permitted only in exceptional circumstances where it can satisfy certain criteria. In this case the Proposed Development meets the exceptional circumstances and is in accordance with Policy R2.</p>
ALDP Policy RD1	<p><b>Yes.</b> The Proposed Development has the necessary infrastructure to support it. It is therefore considered that the Proposed Development is in accordance with Policy RD1.</p>
ALDP Policy E1	<p><b>Yes.</b> The Proposed Development would not have an unacceptable adverse effect on any nature conservation sites designated for their biodiversity, species, habitat,</p>

Policy topic and reference number	Is the development in compliance with policy?
	or geodiversity. It is therefore considered that the Proposed Development is in accordance with Policy E1.
ALDP POLICY E2	<p><b>Yes.</b> The LVA has concluded that Proposed Development would lead to some limited adverse effects on key characteristics, natural landscape elements, features or the composition or quality of the landscape character but in considering whether these effects are 'unacceptable', this requires balancing harms against benefits and it is concluded that the benefits are such that these effects can be considered as acceptable.</p> <p>Similarly, part E2.2 of the policy requires consideration of whether significant adverse impacts on the qualifying interests of a Special Landscape Area are clearly outweighed by benefits. Again, it has been concluded that the limited adverse landscape effects are 'clearly outweighed' by social, environmental, or economic benefits. It is therefore considered the Proposed Development is in accordance with Policy E2.1 and E2.2.</p>
ALDP POLICY HE1	<p><b>Yes.</b> The nature of the Proposed Development would not diminish how the Scheduled Monuments are understood, appreciated, and experienced. The policy requires where there are some adverse impacts on the scheduled monuments, adverse impact should be minimised and justified. In this case, it is considered the reasons for the size and location of the Proposed Development have been justified. The Proposed Development is therefore considered acceptable in relation to in relation to ALDP Policy HE1.</p>

- 6.1.2 The table above illustrates that the Proposed Development accords with the policies of the Development Plan. The assessment has concluded that there are some few adverse effects of the Proposed Development on the landscape character, and it is our view that these localised visual impacts are outweighed by social, environmental and economic benefits of the proposal and as such the proposal is compliant with landscape policies.
- 6.1.3 If the LPA takes a different view, i.e. that there is some conflict with the aims and purposes of the landscape policies, there is then a tension between the objectives of those policies and those which promote renewable energy developments. To resolve this tension, there is specific guidance in the ALDP in relation to the Vision and purpose of the plan. At paragraph 4.1 the plan states that the Vision of the Plan has *'a specific role in assisting Aberdeenshire Council in weighing up potentially conflicting objectives to achieve clearly definable outcomes that accord with those promoted by national and regional strategies. In all cases the vision of the Plan should be used to guide granting of planning permission where conflicts arise...'*
- 6.1.4 NPF4 sets out in its introduction that 'Scotland's future places will be Net Zero.' Policy 1 gives significant weight to the global climate emergency to ensure that it is recognised as a priority in all plans and decisions. There are also numerous documents as set out in Section 4.3 of this Planning Statement that support renewable energy schemes to meet Scotland's climate change targets and greenhouse gas emissions. This Proposed Development in its entirety, (i.e. the whole proposed renewable energy green hydrogen development) is being funded by the Scottish Government's Just Transition Fund in recognition of the pressing need for this type of innovative renewable energy green hydrogen demonstration facility.



- 6.1.5 Within the NPF at Policy 11e) ii) it is recognised that 'significant landscape and visual impacts, are to be expected for some forms of renewable energy. Where impacts are localised and/ or appropriate design mitigation has been applied, they will generally be considered to be acceptable.' For this reason, it is concluded that the weight attributed to the benefits of the Proposed Development in terms of its renewable energy generation attracts significant weight in the planning balancing exercise, to the extent that it clearly outweighs the limited policy conflict arising from the modest landscape harm that would result from the Proposed Development.

## **7 CONCLUSION**

- 7.1.1 The application which is the subject of this statement seeks planning permission for a single wind turbine and associated access track and electrical connection cable. The Proposed Development is part of a wider proposed renewable energy development at the Applicant's Glensaugh Farm sited near Laurencekirk, Aberdeenshire. The application has been subject to pre-application discussions with Aberdeenshire Council who are supportive of the proposal subject to receipt of a detailed scheme and assessments of the extent of effects of the Proposed Development. These have been provided as part of the planning application.
- 7.1.2 The application is accompanied by a number of documents which report the findings of the assessments on a number of substantive issues. Applying the findings of these assessments, it is concluded that the Proposed Development is compliant with all relevant policies. In case it might be deemed to have some conflict with the Aberdeenshire Local Plan (relating to the limited localised visual harm to the landscape), it has been concluded that the wider benefits of the scheme clearly outweigh this limited landscape harm. It is respectfully requested that planning permission is granted for the Proposed Development without delay.