

Scotland's Fourth National Planning Framework Position Statement

This Policy Briefing provides summary information on the Scottish Government report, **Scotland's Fourth National Planning Framework Position Statement**¹. This report sets out the Scottish Government's current thinking on the content of the National Planning Framework 4 (NPF4). The document aims to support further discussions and is not intended to set out policies. The draft NPF4 is expected to be published in autumn 2021. This brief focuses on the three topics mentioned in the document that are of interest for Scottish Renewables. The first topic addresses potential policy changes across sectors for achieving net-zero. The second and third topics outline potential policy changes for renewables, energy storage and co-location of renewable technologies.

KEY POTENTIAL POLICY CHANGES

NET-ZERO AND CLIMATE EMERGENCY

- The long-term strategy will be driven by the overarching goal of addressing climate change.
- Rebalancing the planning system so that climate change is a guiding principle for all plans and decisions.
- Commitment to build on the Climate Change Plan and take forward advice provided by the UK Climate Change Committee. The recommendations of the Just Transition Commission will also inform Scottish Government's actions.
- Promoting nature-based solutions to climate change, including woodland creation and peatland protection and restoration.
- Strengthening support for retaining and reusing buildings to maximise the embodied energy of the building stock as well as supporting the use of materials with low embodied emissions.
- Embedding of the National Transport Strategy 2 Sustainable Travel and Investment Hierarchies into the appraisal and assessment of development proposals as well as the proposals themselves.
- Facilitating development that is highly energy efficient and which meets greenhouse gas emissions standards, including making provision for zero carbon energy generation.
- Integrating development with natural infrastructure, including blue-green networks, to deliver multiple benefits including carbon sequestration, community resilience and health improvement.
- The Scottish National Investment Bank has the opportunity to use its investments to be part of the drive towards a just transition to net-zero emissions.

RENEWABLES

- Prioritising the types and locations of development that will help meet Scotland's emission reduction targets.
- Strengthening the support for re-powering and expanding existing wind farms.
- Updating the current spatial framework for onshore wind to continue to protect National Parks and National Scenic Areas, whilst allowing development outwith these areas where they are demonstrated to be acceptable on the basis of site-specific assessments.
- Supporting development and infrastructure needed to realise the potential of the blue economy and coastal communities, including opportunities to enhance natural infrastructure.
- Revisiting the interface between terrestrial and marine planning to ensure the policy properly reflects more recent developments in marine planning and associated research and evidence.
- Setting out a more practical and outcome-focused approach to accelerating a transition to renewable and zero emissions heating in buildings, including by linking with wider policies for green and blue infrastructure and vacant and derelict land and properties.

ENERGY STORAGE AND CO-LOCATION OF RENEWABLE TECHNOLOGIES

- Introducing new policies that address a wider range of energy generation technologies for example for electrical and thermal storage, and hydrogen.

¹Scotland's Fourth National Planning Framework Position Statement, November 2020. Available at: [Scotland's Fourth National Planning Framework Position Statement \(www.gov.scot\)](http://www.gov.scot)

1 Net-zero and the Climate Emergency

The Scottish Government has the commitment to meet the interim emissions reductions targets of 75% by 2030 and 90 % by 2040 and agree to take forward proposals and policies to support it. The Position Statement highlights key opportunities for; promoting the use of sustainable and recycled materials in new developments; for strengthening policies for securing low carbon heating solutions; supporting renewables; and restricting peat extraction and development on peatland.

Some potential policy changes are:

- Strengthening support for retaining and reusing existing buildings to maximise the use of the embodied energy of the building stock. The Government will consider how carbon assessments can ensure that the carbon stored in buildings is accounted for in decision making.
- Making it more difficult for new developments that generate significant emissions, across the lifecycle of a development as a whole, to gain planning permission.
- Supporting the use of materials with low embodied emissions, that can act as an emissions store and where the materials can be re-used with minimal re-processing at end of life of the building to avoid release of the embodied emissions.
- Embedding of the National Transport Strategy 2 Sustainable Travel and Investment Hierarchies into the appraisal and assessment of development proposals as well as the proposals themselves. This will also be achieved through an infrastructure-first approach to future development.
- Actively planning future development in a way that helps Scotland to achieve zero carbon living that minimises the need to travel by unsustainable modes, for example by helping to create 20-minute neighbourhoods where achievable.
- Facilitating development that is highly energy efficient and which meets greenhouse gas emissions standards, including making provision for zero carbon energy generation.
- Setting out a consistent policy for meeting Section 3F of the Town and Country Planning (Scotland) Act 1997 in relation to emissions policies.
- Clarifying where net-zero building approaches may allow development to proceed by offsetting emissions.
- Promoting nature-based solutions to climate change, including woodland creation and peatland protection and restoration.
- Integrating development with natural infrastructure, including blue-green networks, to deliver multiple benefits including carbon sequestration, community resilience and health improvement.
- In line with the Bank's primary mission, the Scottish National Investment Bank has the opportunity to use its investments to be part of the drive towards a just transition to net zero emissions.

2 Renewables

The Position Statement states that a key opportunity to achieve net-zero is supporting renewable energy developments. This includes the repowering and extensions of existing wind farms and new and replacement grid infrastructure.

• Onshore wind

Some potential policy changes suggested for onshore wind include:

- Strengthening the support for re-powering and expanding existing wind farms.
- Updating the current spatial framework for onshore wind to continue to protect National Parks and National Scenic Areas, whilst allowing development outwith these areas where they are demonstrated to be acceptable on the basis of site-specific assessments

Transversal policy changes that could affect onshore wind

- Aligning the NPF4 with the Land Use Strategy² and identifying opportunities to align emerging Regional Spatial Strategies³ with future Regional Land Use Partnership Frameworks⁴.
- Strengthening the consideration given to the likely effects of development on carbon dioxide (CO₂) emissions where peat and other carbon rich soils are present.

- **Offshore wind**

The report considers aspects for adapting the coastline to the impacts of climate change. The Scottish Government states that the NPF4 will align with Scotland's National Marine Plan as well as sectoral plans for offshore wind and aquaculture, emerging regional marine plans, plans for ports and harbours and the Blue Economy Action Plan. They also mention that The Scottish Crown Estate Act 2019 will also provide opportunities for coastal communities to benefit from their own assets, opening up new opportunities for strengthening their future.

Transversal policy changes that could affect offshore wind:

- Supporting development and infrastructure needed to realise the potential of the blue economy and coastal communities, including opportunities to enhance natural infrastructure. It will also take into account factors in long-term coastal vulnerability and resilience in order to future-proof development decisions.
- Revisiting the interface between terrestrial and marine planning to ensure the policy properly reflects more recent developments in marine planning and associated research and evidence.

- **Renewable Heat**

One of the priorities of the Scottish Government strategy is to facilitate the roll-out of renewable electricity and renewable and zero emissions heat technologies. In the report it is recognised that there is a need to switch to low and zero carbon fuel sources and support the delivery of associated infrastructure such as grid networks and gas pipelines. For this, it will be ensured that the NPF4 helps to deliver on the wider energy strategies including the Scottish Energy Strategy (including any updates), the Energy Efficient Scotland route map, the forthcoming Heat in Buildings Strategy, the vision to 2030 for Scotland's electricity and gas network and the Infrastructure Investment Plan.

Potential policy changes:

- Setting out a more practical and outcome-focused approach to accelerating a transition to renewable and zero emissions heating in buildings, including by linking with wider policies for green and blue infrastructure and vacant and derelict land and properties.

² The land use strategy sets out the vision for achieving sustainable land use in Scotland, the objectives and the policies and actions that will help deliver it. This will be used to guide long-term land use change in a way that helps to reverse patterns of behaviour that are already contributing to emissions.

³ Regional spatial strategies are long-term spatial strategies in respect of strategic development of an area/s which must specify the area/s to which they relate, and identify: 1. The need for strategic development 2. The outcomes to which strategic development will contribute 3. Priorities for the delivery of strategic development 4. Proposed locations, shown in the form of a map or diagram. <https://www.transformingplanning.scot/media/1292/rss-factsheet-for-web-final.pdf>

⁴ The Land Use Strategy identifies such partnerships as the way to better integrate land uses and to consider how land use can support climate change and other environmental and economic ambitions. The government has now committed to enable Regional Partnerships to emerge by 2021 with each Partnership creating a Regional Land Use Framework (RLUF) by 2023. <https://www.gov.scot/publications/first-annual-progress-report-getting-best-land-land-use-strategy-scotland-2016-2021/pages/3/>

3 Energy storage and co-location of Renewable Technologies

The Scottish government recognises that carbon capture and storage and hydrogen present an opportunity to achieve net zero emissions by 2045.

Potential policy changes are:

- Introducing new policies that address a wider range of energy generation technologies for example for electrical and thermal storage, and hydrogen