Planning and Architecture

Scottish Government

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29 January 2021

To whom it may concern,

**Consultation response: Scotland’s Fourth National Planning Framework Position Statement**

Scottish Renewables is the voice of Scotland’s renewable energy industry. Our vision is for Scotland leading the world in renewable energy. We work to grow Scotland’s renewable energy sector and sustain its position at the forefront of the global clean energy industry. We represent over 260 organisations that deliver investment, jobs, social benefits and reduce the carbon emissions which cause climate change.

Our members work across all renewable energy technologies, in Scotland, the UK, Europe and around the world. In representing them, we aim to lead and inform the debate on how the growth of renewable energy can help sustainably heat and power Scotland’s homes and businesses.

Scottish Renewables welcomes the opportunity to provide our views on the Scottish Government’s current thinking on the upcoming National Planning Framework 4 (NPF4) as set out in its Position Statement. In responding, we would like to highlight the following points:

Overall, we welcome the Scottish Government’s objectives, particularly the vision for a long-term strategy for 2050 driven by the overarching goal of addressing climate change and the recognition that the planning system will have to be rebalanced to ensure that addressing the Climate Emergency is central to all plans and decisions. We look forward to working collaboratively with Government to develop strategies for achieving these objectives.

We appreciate that Government will extensively consult on the detail of the NPF4 in Autumn 2021, however we would like to highlight the following points at this stage:

* We are concerned that continuing to use terms such as “appropriately located renewable energy developments” is counter to the objective of rebalancing of the planning system to give due weight to the Climate Emergency and net-zero.
* Some of the objectives, such as prioritising brownfield development and restricting peat extraction and development on peatland, may have unintended consequences for the development of new onshore wind sites.
* Given the delay to NPF4, we would like to see some interim measures ahead of the legislation being laid to enable industry to work towards meeting Scotland’s ambitious net-zero commitments.

Scottish Renewables would be keen to engage further with this agenda and would be happy to discuss our response in more detail.

Yours sincerely

Stephanie Conesa  
**Policy Manager - Development, Planning & Onshore Wind**

**Scottish Renewables**

**Consultation Questions**

**1. Do you agree with our current thinking on planning for net-zero emissions?**

Scottish Renewables shares the Scottish Government’s vision of a “long-term strategy… driven by the overarching goal of addressing climate change” and we welcome Kevin Stewart’s Ministerial Forward stating that “We will have to rebalance the planning system so that climate change is a guiding principle for all plans and decisions.”

We are pleased to see key points from Scottish Renewables’ submissions to the Scottish Government’s Call for Ideas reflected in the Position Statement, including the objectives of:

* Supporting renewable energy developments, including strengthening support for the repowering and extension of existing wind farms and new and replacement grid infrastructure
* Prioritising the types of development that will help meet our emission reduction targets
* The need for flexibility to ensure policies keep pace with future technological change
* Considering whether policies on wild land need to change

We also support the statement that “Significant further investment will be needed to support new technologies for carbon capture and storage; hydrogen; sustainable and active travel; electricity grid capacity (including subsea links to the islands); and decarbonisation of heating, our transport networks and vehicle fleets.”

We look forward to working with Government to develop strategies for achieving these objectives.

While we understand the need to balance various considerations in the planning process, we are concerned that terms such as “appropriately located renewable energy developments” do not provide the clear direction to planning authorities and other decision makers that is necessary to rebalance the planning system. The planning process is not currently set up to focus on the Climate Emergency and net-zero and significant attention should be given to refocussing the planning process to address these. It is our position that the need to address the Climate Emergency and achieve net-zero should be given substantial weight over subjective matters such as landscape capacity and landscape accommodation in the planning process.

**2. Do you agree with our current thinking on planning for resilient communities?**

This is outside of Scottish Renewables’ remit and area of expertise, but we are broadly supportive of the Scottish Government’s objectives.

**3. Do you agree with our current thinking on planning for a wellbeing economy?**

We are broadly supportive of the Scottish Government’s objectives and would particularly welcome a new spatial strategy that will support a sustainable and green economic recovery.

**4. Do you agree with our current thinking on planning for better, greener places?**

The Position Statement sets out that “shifting future development away from greenfield land including by actively enabling the redevelopment of vacant and derelict land” is a key opportunity for stimulating the green economy. We agree that redeveloping vacant and derelict land with renewables such as solar and heat can contribute to reducing Scotland’s emissions, however we are concerned that this wording could have unintended consequences for the development of new onshore wind sites. We would therefore ask that this be clarified in the NPF4.

Scottish Renewables and its members support the need to carefully manage Scotland’s carbon-rich soils and extensive peatlands as a key part of our response to the Climate Emergency. However, we are concerned that “restricting peat extraction and development on peatland” is presented as an option for reducing emissions.

The renewable energy industry has demonstrated that responsible development can contribute to addressing climate change and delivering a sustainable economy. Onshore wind farm developers are working to restore damaged peatland, enhancing its value as a carbon store and protecting important habitats for future generations. Renewables are also a valuable source of private investment for peatland restoration. Scottish Renewables has recently published a document showcasing the work of three renewable energy businesses whose contributions alone represent £2.5 million of peatland restoration work at sites across the country[[1]](#footnote-2).

**5. Do you have further suggestions on how we can deliver our strategy?**

We broadly agree with the objectives set out in the Scottish Government’s Position Statement and would welcome the opportunity to work collaboratively on developing strategies for achieving these objectives.

Given the delay to NPF4, industry would like to see some interim measures ahead of the legislation being laid, including:

* Expediating policy proposals to make the Climate Emergency a material consideration in planning.
* Introducing an immediate presumption in favour of repowering with supporting guidance on how it should be applied.
* Commissioning an urgent review of the improvements to the consenting process to deliver timely consents.

**6. Do you have any comments on the Integrated Impact Assessment Update Report, published alongside this position statement?**

This is outside of Scottish Renewables’ remit and area of expertise, but we are broadly supportive of the Scottish Government’s objectives.

**7. Do you have any other comments on the content of the Position Statement?**

1. <https://www.scottishrenewables.com/publications/739-wind-power-and-peatland-enhancing-unique-habitats> [↑](#footnote-ref-2)