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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 action plans 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:

* Given the delay to NPF4, we would like to see some interim measures initiated urgently ahead of the next stage of the NPF4 being progressed to enable industry, communities, and the supply chain to invest now in meeting Scotland’s ambitious net-zero commitments.
* We are concerned that continuing to use terms such as “appropriately located renewable energy developments” could undermine the Scottish Government’s intention to rebalance the planning system to give due weight to the Climate Emergency and net-zero in decision making.
* Some of the objectives, such as prioritising brownfield development, may have unintended consequences for the development of new renewable energy sites.

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 action plans 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 meaningfully in favour of climate mitigation. Significant attention should now be given to ensure the planning process is future proofed to address the growing Climate Emergency.

We recommend that NPF4 should provide a supportive policy context for the installation of modern turbines and have the flexibility to accommodate the speed of technological change in turbine design, as well as ensuring that the need case for renewables is properly acknowledged in the planning balance. NPF4 should recognise that addressing the Climate Emergency will have some development impact on landscapes and the acceptability, or otherwise, of any significant landscape effects must be considered in light of the Climate Emergency and Scotland’s net-zero target.

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

We are broadly supportive of the Scottish Government’s objectives in this regard. Renewable energy development has the potential to provide significant sustainable economic development and stimulus in communities. Given that renewable technologies and resources (particularly wind, solar and hydro) tend to be located in more rural areas, there is a significant opportunity to use renewable energy development to create resilient, long-term economic opportunities in rural communities. There is also a great opportunity to align this with the objective set out in the Position Statement of encouraging repopulation of rural areas.

**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 policy framework and proportionate, appropriate spatial strategy that will support a sustainable and green economic recovery. Low-carbon, renewable energy is central to wellbeing in many respects, and therefore ensuring that the NPF4 delivers an investment environment for renewable energy development is critical.

**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 district heating 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. Due to the limited scale of brownfield sites and proximity to towns and cities, the potential for large-scale renewable energy development on these sites is restrictive. Renewable development on greenfield sites will be required to meet net-zero targets and 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…development on peatland” could be interpreted as a blanket ban on any development, without recognising the opportunity for appropriate development where carbon benefits can be demonstrated.

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 eroded peatland, with very rapid payback times for any short-term carbon effects of development. 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 vision and strategy for 2050 set out in the Scottish Government’s Position Statement and would welcome the opportunity to work collaboratively on developing strategies, plans and policies for achieving these objectives.

Given the lifespan of the NPF4 before it is due to be reviewed, as well as the need for urgent climate action over the next decade, we would add that actions between now and 2030/2032 should be a clear objective for the planning framework.

Additionally, given the delay out to 2022, industry would like to see interim measures ahead of the NPF4 being further progressed, including as a first priority:

* Clear direction from Ministers, by advice and through s36 and planning appeal decisions, that the planning balance has tilted in favour of the Climate Emergency and net zero and that all decision makers must recognise this.

Industry has also called for consideration of the following:

* 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 needed 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?**

Scottish Renewables research has demonstrated that every gigawatt of renewable power installed in Scotland creates 1,500 jobs and adds £133 million of GVA to our economy[[2]](#footnote-3).

Renewable energy developments have great potential to create healthier, more prosperous places, particularly in rural areas, and to contribute to the Scottish Government’s objectives of a “green, sustainable, and inclusive economic recovery.”

As we work toward a planning framework that addresses the Climate Emergency and net zero, we have a great opportunity to develop strategies than enable the deployment of renewable energy which is essential to meet our climate objectives.

1. <https://www.scottishrenewables.com/publications/739-wind-power-and-peatland-enhancing-unique-habitats> [↑](#footnote-ref-2)
2. <https://www.scottishrenewables.com/publications/645-gva-and-jobs-created-by-deployment-of-renewable-electricity-projects-in-scotland> [↑](#footnote-ref-3)