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19 February 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 priority 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:

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- 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 restricting development on peatland and 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

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Consultation Questions

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

Scottish Renewables is fully aligned with the Scottish Government's assertion that "We cannot afford to compromise on climate change" and agree that "if we are to meet our targets, some significant choices will have to be made."

We welcome the Scottish Government's vision that "climate change will be the overarching priority for [its] spatial strategy" and agree that "to achieve a net zero Scotland by 2045 and meet the interim emissions reduction targets of 75% by 2030 and 90% by 2040, an urgent and radical shift in our spatial plan and policies is required."

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
- Facilitating decarbonised heating and electricity generation and distribution
- 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 policy and action plans for achieving these objectives.

While we understand the need to balance various considerations in the planning process, we are concerned that simply stating that the Climate Emergency is a material consideration and attaching caveats 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.

To say the Climate Emergency is a material consideration does no more than recognise that the Climate Emergency is a planning consideration, which would not signal a radical shift and would not treat climate change as an overriding priority. Significant attention should now be given to

ensuring the planning process is future-proofed to address the growing Climate Emergency and giving it significant weight and importance in all plans, policies and decisions.

Central to the efficacy of this objective is the need to ensure the planning system enables local authorities to gather the tools and expertise necessary to consider planning applications within the wider national and global context of the Climate Emergency. Historically, their consideration has been weighted towards local impacts such as landscape and visual impact.

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 the context 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. We agree with the principle that resilient communities should form an important part in the decision-making process. Communities are key stakeholders in the consultation and determination of applications and importance should be placed on the principle within Part 3ZA of The Planning (Scotland) Act 2019, which defines the purpose of planning as "to manage the development and use of land in the long-term public interest".

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 Scottish Government's Position Statement of encouraging repopulation of rural areas. We would add that these objectives are well-aligned with the potential to utilise vacant and derelict land as promoted by the Scottish Land Commission.

Increased certainty in the form of clear planning and policy support for green infrastructure can drive support towards potential investment into Scotland, thereby underpinning greater resilience within the local job market and wider economy.

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 and encourage the certainty and flexibility to encourage investment. Renewable energy development can make a significant contribution to a wellbeing economy. 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, storage, energy from waste, biomass and district heating can contribute to reducing Scotland’s emissions. Developing vacant land with renewables close to settlements may also provide benefits from proximity to end users.

We are, however, concerned that this wording could have unintended consequences for the development of new onshore wind, hydro and solar sites. Due to the limited scale of most brownfield sites and their general proximity to towns and cities, the potential for large-scale onshore wind development on these sites is restrictive. Onshore wind and other renewable energy development on greenfield sites will be required to meet net zero targets and we would therefore ask that this be clarified in the NPF4.

It is also important to point out that a “greenfield” site is not necessarily of pristine quality. In many cases “greenfield sites” may have become degraded by previous land uses and their subsequent uses as renewable energy sites have contributed to the restoration of degraded habitats.

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, 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. Onshore wind farm developers are working to restore eroded peatland. 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 country¹.

¹ <https://www.scottishrenewables.com/publications/739-wind-power-and-peatland-enhancing-unique-habitats>

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 as a 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, either through the addition of a significant material consideration or a test of special regard, and supporting guidance for all decision makers to recognise this.
- 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 economy².

² <https://www.scottishrenewables.com/publications/645-gva-and-jobs-created-by-deployment-of-renewable-electricity-projects-in-scotland>

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 that facilitate and encourage the increased deployment of renewable energy which is essential to meet our climate objectives.