

WHAT THE RENEWABLE ENERGY INDUSTRY NEEDS FROM NPF4

For the Scottish Government to realise its commitments to reduce emissions and achieve net-zero by 2045, substantial changes are required to current planning policy.

The National Planning Framework 4, **NPF4**, currently being developed by government provides this opportunity. If designed correctly, NPF4 can deliver a more supportive approach to allow the level of deployment of renewable energy technologies needed to tackle the climate emergency.

To achieve this Scottish Renewables advocates that NPF4 should be guided by these values:

- Net-zero and the climate emergency should be the guiding principle for all plans and decisions with special regard given to applications for renewable energy developments.
- Renewable energy is sustainable development and in the long-term public interest, and there should be explicit planning support for its development.
- Planning policy must be designed to evolve to accommodate current and future climate and energy policy over NPF4's ten-year time span.
- Deployment at scale must be achieved on a zero-subsidy basis, which requires barriers to deployment to be addressed through policy, both in national and local decision-making.
- Delivering consents swiftly and consistently, will create investor confidence for both large projects, and larger numbers of smaller-scale projects.
- More efficient and proportionate Environmental Impact Assessments (EIAs) are required if deployment at scale is to be achieved on a zero-subsidy basis.

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To address anomalies in the planning system that have previously hindered deployment of renewables, the following require attention:

- Under NPF4, onshore wind should be treated in the same manner as other industries and granted consent in perpetuity.
- Landscape Sensitivity Studies should replace Landscape Capacity Studies and offer high-level information to assist decision-makers with identifying relative sensitivities within the landscape.
- Landscape capacity and landscape accommodation are subjective matters which should be weighed in the planning balance against more certain matters such as climate change and affordable, low-carbon energy.

NPF4 should provide a supportive policy framework to deliver the use of the most efficient, modern turbines and have the flexibility to accommodate the speed of technological change in turbine design;

- Repowering and life extension of onshore wind farms, as well as the extension of existing farms, offers significant opportunity to increase clean energy generation, and consents should reflect this.
- To unlock the capacity of onshore windfarms which have consent but are unbuilt, projects may need to be re-consented to allow for the use of modern turbines.
- A proportionate and consistent approach to consenting energy storage solutions and the co-location of storage technology will be required, and should deliver, consistent and predictable results.
- As Scotland's offshore wind ambitions increase, national planning policy needs to provide a supportive framework to facilitate the development of the onshore aspects of these schemes.

To support the deployment of a range of renewable technologies and the grid operation benefits that these bring, NPF4 should address the following;

- Solar deployment in Scotland can be increased where the planning and policy environment can help reduce cost burdens.
- A supportive policy framework for the development of further small-scale hydroelectric schemes, particularly in rural areas is required.
- Scotland's pumped storage hydro schemes are nationally important due to their benefits to the energy system and should be supported with an appropriate framework, both for new and existing schemes.
- All proposals for new development should provide their primary heating requirements with renewable sources, with connection to suitable renewable heat networks mandatory, if available.



Scottish Renewables

6th Floor, Tara House
46 Bath Street, Glasgow
G2 1HG

t. 0141 353 4980

e. info@scottishrenewables.com

w. www.scottishrenewables.com