

Scottish Renewables written evidence to The Scottish Parliament's call for views on the draft National Planning Framework 4.

About Scottish Renewables

Scottish Renewables (SR) is the voice of Scotland's renewable energy industry, working to grow the sector and sustain its position at the forefront of the global clean energy transition. We represent around 270 organisations across the full range of renewable energy technologies in Scotland and around the world, ranging from energy suppliers, operators and manufacturers to small developers, installers, and community groups, as well as companies throughout the supply chain.

Scottish Renewables welcomes the opportunity to provide written evidence to the Scottish Parliament's Local Government, House and Planning Committee call for views on the draft NPF4, asking how space, land and environments in Scotland should be designed and planned.

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

Call for Views Questions

Consultation and development of the draft NPF4

1. Please provide your views on the consultation and development of NPF4 and how this has contributed to the draft.

While the high-level principles of the draft NPF4 reflect key asks SR included in our February 2020 Call for Ideas consultation response to The Scottish Government and reflect commitments made by The Scottish Government in their November 2021 Position Statement, these are not reflected in the detailed text of the draft NPF4.

In addition to the draft NPF4 in its current form is not reflecting the detail of our consultation response or the Position Statement, it does not reflect the detail of other key government policies; not limited to tackling the climate emergency, achieving a net-zero Scotland, delivering a Scottish green recovery, delivering a clean energy system and decarbonising Scotland's homes and buildings.

The Scottish Government is currently consulting on their proposed update to the Onshore Wind Policy Statement (OWPS). This consultation seeks views on an additional 8-12GW of onshore wind to be installed by 2030. This is in line with the deployment levels indicated by the Climate Change Committee's 6th Carbon Budgets and would support the achievement of The Scottish Government's statutory binding 2045 net-zero target.

The Onshore Wind Policy Statement and NPF4 are intrinsically interlinked but appear to have been developed and drafted in isolation. The NPF4 should be an enabling tool for the ambitions set by the Energy and Climate Change Directorate within The Scottish Government, but in its current form it fails to give decision makes the clear direction needed to achieve these ambitions.

If the NPF4 fails to rebalance the planning system and does not contain a clear mechanism for making climate change and nature recovery the primary guiding principles for all plans and decisions, it will not be possible to achieve the target set out in the OWPS.

2. Please provide your views on the structure of the National Planning Framework 4 document.

We welcome The Scottish Government's commitment within NPF4 that "*To achieve a net zero, nature-positive Scotland, we must rebalance our planning system so that climate change and nature recovery are the primary guiding principles for all our plans and all our decisions.*"

The proposed draft NPF4 in its current form falls short of these ambitions as there is no clear guidance on how the planning balance should change to ensure addressing climate change and supporting nature recovery are the primary guiding principles in all plans and all decisions.

We welcome the numerous assertions within the draft NPF4 of the need to expand renewable energy generation as a key enabler of achieving net-zero. However, the current proposed draft NPF4 overall as a roadmap does not support the shared ambition of The Scottish Government and renewable energy industry for an expansion of clean energy deployment.

The structure and text regarding renewable energy is disjointed and at times contradictory with many of the changes proposed actively undermining the renewables consenting process. Combined, these will create confusion and uncertainty in policy and decision making at a local level (including but not limited to Local Authorities) and as a result will not deliver the change required to meet the overarching objectives of the NPF.

Within the structure and text there is no indication of, nor guidance on, a hierarchy of priorities that places addressing climate change and nature recovery as the primary principles. Throughout the structure of the document there is also persistent ambiguity that leaves the prioritisation of different priorities open to interpretation. This ambiguity and lack of clarity around prioritisation fundamentally undermines the ambition for NPF4 to create a planning system that supports our legally binding target of reaching net-zero by 2045.

3. Please provide your views on the incorporation of the Scottish Planning Policy and coherence of the NPF4 document overall as a roadmap.

We welcome the incorporation of the Scottish Planning Policy (SPP) into the NPF4 document but do not consider that the current draft provides a coherent road map for achieving our net-zero obligations by 2045.

We have outlined in point 3 the challenges with the structure and text.

Within this consultation response we highlight specific problems with the current draft. However, due to the significant redrafting required to ensure NPF4 does not fundamentally undermine the continued expansion of low carbon and net-zero energy technologies as a key contributor to net-

zero emissions by 2045, we would welcome the opportunity to discuss our recommendations on redrafting with the Committee.

Part 1 – A National Spatial Strategy for Scotland 2045

What is your view on each of the following elements of the strategy? To what extent do they:

- meet housing needs, particularly those of older people and disabled people
- support efforts to meet greenhouse gas emissions targets
- improve health and wellbeing
- repopulate rural areas
- improve equality
- secure “positive effects for biodiversity”
- Interact with other Scottish Government strategies
- Conflict with other outcomes and state how these conflicts will be managed

1. What is your view on the Sustainable Places section?

SR **broadly agrees** with this approach as one that will deliver our future net-zero places, build resilience to climate change, and support the recovery of our natural places. However, there is a fundamental omission within this priority as it only focuses on how places will build their resilience to the impacts of climate change. It does not include the role places will need to play in addressing the climate emergency by proactively reducing emissions to meet our climate change targets. If the ambition of this priority is to be realised, it should be amended to:

“Our future net zero places will *support the achievement of our emission reductions targets*, be more resilient to the impacts of climate change and support recovery of our natural environment.”

SR welcomes that ‘sustainable places’ is one of the four overarching spatial principles of the national spatial strategy for Scotland. We also welcome The Scottish Government’s commitment to expanding renewable energy generation as a key component of creating sustainable places.

However, the ‘presumption in favour of sustainable development’ test has been removed from the draft NPF4 and a stronger statement needs to be made to replace it. We acknowledge that, under NPF3, the presumption in favour of sustainable development was open to interpretation and there was a lack of clarity on how it should be considered in the planning balance. It is essential that, in making a replacement statement, there is no ambiguity and there is clarity on how the replacement statement should be applied.

We recommend that a test based on the UN Sustainable Development Goals should be introduced and should act as a ‘golden thread’ running through the document. Such a test would support The Scottish Government’s commitment to expanding renewables energy generation as a key component of creating sustainable places.

While SR supports the overarching principle of ‘sustainable places’, the draft NPF4 will not deliver our net-zero target without significant redrafting of the detailed policies to remove contradictions, uncertainty and deliver the real change required to meet the aims of the NPF.

2. What is your view on the Liveable Places section?

SR **broadly agrees** with what is included in this approach however the significant impacts on health caused by climate change are not included. Furthermore, there is no mention that climate change disproportionately impacts impoverished, excluded and minority communities.

Our members highlight that a permanent shift away from our reliance on fossil fuels and use of low carbon heating reduces fuel poverty and improves air quality; both impacting positively on health. Community owned renewable energy projects or shared community ownership of projects empower communities whilst large-scale projects provide economic activity and jobs.

As currently written, the 'liveable places' section treats the wellbeing of humans and nature as being separate from our collective action on climate change when they are unquestionably and intrinsically entwined.

We recommend that this priority should be amended to include a commitment to provide the infrastructure required to deliver more sustainable ways of heating our homes and buildings, and decarbonising transport.

3. What is your view on the Productive Places section?

SR **broadly agrees** with this approach. We would highlight that while productive places currently encompasses onshore renewable developments, it is important that it is strategically aligned with policy development that enables our offshore renewable sector, such as the upcoming review of the National Marine Plan and the evolution of the relevant Sectoral Marine Plans.

A key component of creating productive places will be attracting inward investment to deliver the significant infrastructure required to meet our net-zero target, especially the key emissions reductions set for 2030. Currently, there are multiple contradictions within the draft NPF4 that undermine investor confidence. It is essential that these contradictions are addressed to ensure the NPF4 provides clear and unambiguous priorities for investment in low carbon infrastructure.

With regards to infrastructure investment, we welcome the inclusion of 'Strategic Renewable Electricity Generation and Transmission Infrastructure' as a National Development. It will be essential for the onshore grid capacity upgrades required to deliver our offshore wind ambition of 11GW by 2030 to be given the highest possible priority as enabling development for net-zero.

The current Offshore Transmission Network Review proposals demand a more strategic and efficient approach to large scale offshore development, which will need to be reflected in the onshore planning framework.

The Scottish Offshore Wind Energy Council has produced a range of reports over the last year exploring how to maximise the socio-economic benefits of offshore wind deployment in Scotland. Key recommendations, such as the establishment of a Scottish Floating Offshore Wind Port Cluster, should be specially recognised within the NPF4. Scottish ports around our coastline stand to benefit from the significant expansion of offshore wind (and integration of larger onshore wind turbines) and will be an area of renewed industrial activity which can underpin a Scottish green recovery creating the jobs to underpin our net-zero economy.

4. What is your view on the Distinctive Places section?

SR **broadly agrees** with this approach; however, it is predominantly focused on urban areas and does not acknowledge the key role renewable energy developments can play in delivering distinctive places for Scottish communities.

The current urban focus risks creating a 'one size fits all' approach to planning which ignores the infrastructure required to deliver transitional change in rural areas.

Renewable energy developments such as Whitelee, in South Lanarkshire demonstrate how energy generation, energy storage, biodiversity enhancement, outdoor recreation and education can be combined to create a distinctive, safe, and pleasant, easy to move around, welcoming, nature-positive and resource efficient place. Renewable energy developments have also been delivering peatland restoration and biodiversity management for many years as outlined in the SR publication 'Wind power and peatland – Enhancing unique habitats'.

NPF4 provides the opportunity to create a framework that unlocks all these benefits, but this is not reflected in the current text. Significant redrafting of the detailed policies is needed to ensure we move away from the mindset of either/or with regards to the benefits planning seeks to deliver and moves to a mindset focused on delivering multiple benefits on a single site.

5. What is your view on the 'Spatial principles for Scotland 2045' section?

SR **does not agree** that the 'Spatial principles for Scotland 2045' section will enable the right choices to be made about where development should be located.

The principles are so broad that it is unclear how they will deliver tangible results through the planning system, and we are unclear on what role they are expected to play.

The principles are also disconnected from the overarching ambitions of the spatial plan and contain no reference to climate change and nature recovery as the primary guiding principles for all plans and decisions.

We welcome the inclusion of a Just Transition in the principles; however, a clear hierarchy of how the various ambitions and principles should be addressed within the planning balance is required.

We are also concerned that the principles are almost entirely focused on domestic and non-domestic buildings and the transport infrastructure around them. There is no acknowledgement of the key infrastructure that will be needed to achieve the energy transition net-zero requires such as renewable energy generation, energy storage and grid reinforcements.

6. Do you have any other comments on the National Spatial Strategy outlined in NPF4?

SR **does not agree** that the National Spatial Strategy outlined in NPF4 will deliver future places that overall are sustainable, liveable, productive, and distinctive.

SR supports the overarching ambition of the spatial strategy which states:

“We must embrace and deliver radical change so we can tackle and adapt to climate change, restore biodiversity loss, improve health and wellbeing, build a wellbeing economy and create great places.”

However, we are concerned about the lack of clarity within the text as to how the different elements should be treated in the planning balance. The overarching headings of sustainable places, liveable places, productive places, and distinctive places are disconnected from the ‘Spatial principles for Scotland 2045’ and the relationship between them is not clear.

Part 3 – National Planning Policy states:

“To achieve a net zero, nature-positive Scotland, we must rebalance our planning system so that climate change and nature recovery are the primary guiding principles for all our plans and all our decisions.”

But this statement is not reflected anywhere in the opening sections of the document. Given that Scotland also has a legally binding target to reach net-zero by 2045, it is deeply concerning that this is not reflected anywhere in the ‘Spatial principles for Scotland 2045’.

We are also concerned that the spatial strategy does not include a recognition of the importance of location for specific renewable technologies required to achieve net-zero.

Examples of these locations include but are not limited to:

- Onshore wind in non-designated areas.
- Green hydrogen plants near hydrogen hubs.
- Energy balancing technologies near grid supply points.

SR recommends that The Scottish Government review the need for the inclusion of the need to achieve net-zero as a guiding principle for locational requirements which are to be considered in the whole as part of the draft NPF4.

7. What is your view on the ‘Action areas for Scotland 2045’ section?

SR **does not agree** that the ‘Action areas for Scotland 2045’ section provides a strong basis to take forward regional priority actions.

The statements in this and the subsequent sections are very high level, and it is unclear what role they are expected to play in the planning system. We are also unclear on what these action areas are supposed to achieve over and above the principles set out elsewhere in the draft NPF4.

Furthermore, the draft document makes no reference to the fact that the landscape of a net-zero Scotland will look different from today if we are to achieve the ambitions set by The Scottish Government.

8. Do you have any other comments on the Action areas for Scotland 2045 outlined in NPF4?

Please see our answers to Q5, Q6 and Q7 regarding our concerns about the lack of a prioritisation hierarchy, the disconnected nature of the ambitions and principles, and our questions over the role of the principles and action areas.

We would reiterate our point made in answer to Question 1 that the current draft of the NPF4 is disconnected from the work of the Energy Directorate. Considering the fundamental role our energy transition will play in the achievement of net-zero and the significant role planning will need to play in facilitating the expansion of renewable energy generation, this disconnect needs to be urgently addressed.

No reference is made to the 8-10GW of offshore wind that will be consented in January 2022 through the ScotWind leasing round run by Crown Estate Scotland. There is also no reference to the 4.5GW of offshore renewables in the recently announced Innovation and Targeted Oil and Gas Decarbonisation (INTOG) leasing round. All of which will be constructed off the north and east coasts of Scotland delivering much needed economic opportunities to communities impacted by our shift away from fossil fuel extraction. This will likely become Scotland's largest series of infrastructure projects in the next decade, and we are concerned by their omission.

Part 2 – National Developments

Please provide your view on the developments listed as National Developments in the NPF4. Are these the right priorities? To what extent do they:

- **meet housing needs, particularly those of older people and disabled people**
- **support efforts to meet greenhouse gas emissions targets**
- **improve health and wellbeing**
- **repopulate rural areas**
- **improve equality**
- **secure “positive effects for biodiversity”**
- **interact with other Scottish Government strategies**
- **conflict with other outcomes and state how these conflicts will be managed**

Please provide your views on each of the National Developments

1. Central Scotland Green Network

2. National Walking, Cycling and Wheeling Network

SR welcomes the emphasis put on walking, cycling and wheeling as a key part of achieving Scotland's net-zero obligations.

We agree that Scotland requires much more walking, cycling and wheeling infrastructure but would highlight that onshore wind projects provide greater access to green spaces for walking and cycling. Publicly available data from sites such as Strava show that many wind farm tracks in Scotland are used to some degree for recreation including dog walkers, bikers, and runners.

Specific wind farms have also become tourist attractions, providing access to green spaces for walking and cycling, as well as education, as has been demonstrated at Whitelee¹ and as is

¹ https://bvgassociates.com/wp-content/uploads/2019/06/BVGA_SPR-Whitelee_10_year_anniversary-r1.pdf

being explored in the Hagshaw Hill cluster project. There is also potential for wind farm tracks to be used to help establish new long-distance routes as has happened with the Griffin Wind Farm providing an essential link in the River Tay Way.

3. Urban Mass/Rapid Transit Networks (Aberdeen, Edinburgh, Glasgow)

4. Urban, Sustainable Blue and Green drainage solutions

5. Circular Economy Material Management Facilities

6. Digital Fibre Network

7. Island Hub for Net Zero

We are supportive of the ambition of this National Development, but we are concerned that no guidance is provided within the current text of the draft NPF4 on how the aspirations of this National Development should be treated in the planning balance.

8. Industrial Green Transition Zones

We are supportive of the ambition of this National Development, but we have the same concern about planning balance as set out in our answer to Question 7.

9. Pumped Hydro Storage

While SR is supportive of the inclusion of Pumped Storage Hydro (PSH) as National Development 9 as recognition of the key importance of long duration storage in supporting renewable energy generation to achieve our legally binding net-zero target, we question how helpful this status will be in achieving the levels of deployment net-zero requires.

Development practice indicates that the designation as a national development provides negligible benefits within the planning system. The fact that several national developments from NPF3 have been rolled forward into NPF4 is further evidence that it does not work as a planning mechanism.

Unless the classification of national development is given an enhanced status in decision making and recognised in the planning balance there is little benefit in this classification.

10. Hunterston Strategic Asset

Our views on this National Development are the same as for Questions 7 & 8 and we reiterate our concern regarding the 50mw limit set out in detail in our answer to Question 12.

11. Chapelcross Power Station Redevelopment

SR highlights that renewable energy outside of Chapelcross is not mentioned in the Southern sustainability section of the document.

12. Strategic Renewable Electricity Generation and Transmission Infrastructure

While SR is supportive of the inclusion of Strategic Renewable Electricity Generation and Transmission Infrastructure as National development 12 as recognition of the key importance of renewable energy to achieving our legally binding net-zero target, we question how helpful this status will be in achieving the levels of deployment net-zero requires.

Development practice indicates that the designation as a national development provides negligible benefits within the planning system. The fact that several national developments from NPF3 have been rolled forward into NPF4 is further evidence that it does not work as a planning mechanism.

The levels of renewable energy deployment needed to achieve net-zero are substantial and all renewable energy deployment that can be brought forward will be needed. Designating only projects of 50MW or greater as nationally significant ignores this reality.

Likewise designating grid infrastructure or 132kv or more nationally significant, ignores the complexity of our grid infrastructure particularly with regards to how electricity from offshore wind farms is brought onshore.

As it stands there is a significant risk that decision makers will place diminished importance on <50MW and <132kv projects and infrastructure despite their importance to achieving net-zero.

Unless the classification of national development is given an enhanced status in decision making and recognised in the planning balance over matters which are local in nature then we see little benefit in this classification and significant risks that it could undermine necessary renewables deployment and grid reinforcements that fall outside of the current classes.

13. High Speed Rail

14. Clyde Mission

We are supportive of the ambition of this National Development, but we are concerned that it makes no mention of the renewable energy or low carbon heat potential of the area. This is despite the Queen's Quay district heat network, powered by the River Clyde at Clydebank demonstrating the potential of this area to provide low carbon heating.

15. Aberdeen Harbour

We are supportive of the ambition of this National Development, but we are concerned that point c uses the ambiguous term 'green infrastructure'. This term is open to interpretation and should be reworded to ensure it clearly encompasses offshore renewable energy as set out in the introductory text of this section.

16. Dundee Waterfront

We are supportive of the ambition of this National Development, but we are concerned that it makes no mention of the potential of offshore wind developments and their likely need for port infrastructure. There is also no mention of low carbon heat infrastructure despite the V&A Dundee using a ground source heat pump, demonstrating the potential in this area.

17. Edinburgh Waterfront

We are supportive of the ambition of this National Development, but we are concerned that point d uses the ambiguous term 'green and infrastructure'. This term is open to interpretation and should be reworded to ensure it clearly encompasses offshore renewable energy as set out in the introductory text of this section.

18. Stranraer Gateway

19. Please provide any other comments on the National Developments section of the NPF4?

Our members agree that local issues can cause further issues, but there is consensus that there is a need for national developments but that the wording within the National Developments section must be strengthened.

The level of information provided does not provide a meaningful statement of need that can usefully be used within the planning process. The implications of the statement of need are so high level, they provide no clear guidance to communities, applicants, and planning authorities as to how a proposal should be handled.

Green Energy, as a national development arguably runs through all the spatial strategies as it is noted on the plans. However, with no location identified (and we do not consider the NPF should go into such detail) then there is a risk that there will be continued use of 'wrong project in the wrong place' which will hinder the level of development required to achieve Scotland's net-zero obligations.

We are concerned that Cromarty Firth has not been considered for national development status. Cromarty Firth is expected to become a key location for the development of Scotland's offshore wind industry and has been highlighted by both industry and The Scottish Government as the most logical location for an offshore wind hub.

It is also the location of a green hydrogen hub and plans are in place to have the largest electrolyser in the U.K. in production by 2024.

In light of its significance to our energy transition, the Cromarty Firth should have national development status. However, unless the classification of national development is given an enhanced status in decision making and recognised in the planning balance over matters which are local in nature then we see little benefit in this designation.

Part 3 – National Planning Policy

Are these the right priorities? To what extent do they:

- meet housing needs, particularly those of older people and disabled people
- support efforts to meet greenhouse gas emissions targets
- improve health and wellbeing
- repopulate rural areas
- improve equality
- secure "positive effects for biodiversity"
- interact with other Scottish Government strategies
- conflict with other outcomes and state how these conflicts will be managed

Please provide your views on each of the National Planning Policies

1. Policy 1: Plan-led approach to sustainable development

SR **broadly agrees** with the plan-led approach of Policy 1 to sustainable development. Planning should be consistent at a national level and must take account of The Scottish Government's energy policy and the key role renewable energy plays in achieving net-zero.

We highlight the need for Policy 1 to be made much more explicit. At present this policy is too conceptual, will be interpreted in different ways by different people and is unlikely to deliver the radical change which NPF4 is intended to deliver.

There is already evidence in the form of responses to NPF4 in appeals and Public Local Inquiries that Local Planning Authorities already see NPF4 as supporting the status quo and not the radical change envisaged by The Scottish Government.

2. Policy 2: Climate emergency

SR welcomes and supports Policy 2 relating to the global climate emergency in the decision-making process.

Whilst the statement in itself is clear, it is not strong enough and does not provide clarity as to how decision makers should deal with this provision in striking a planning balance. We would reiterate the points regarding rebalancing planning and it is essential that clarity is also provided on what 'significant weight should be given to the global climate emergency' means in practice.

When considering developments that address the global climate emergency, the weight afforded to temporary and reversible effects, or effects that are entirely local in nature, should be minimal.

It is unclear how this policy would relate to the application and interpretation of Policy 19: Green Energy as it contains a test that relates solely to a decision maker deciding whether the effects arising from any given proposal are acceptable or not. Clarity is needed on the relationship between Policy 1 and Policy 19.

We highlight that Policy 2 does not include the crucial need for infrastructure that reduces our national emissions.

We agree with clauses (a)-(d) but recommend an additional clause is added which supports developments that reduce our national emissions, for example by generating renewable or low carbon energy.

3. Policy 3: Nature crisis

SR **partially agrees** with the approach of Policy 3 and welcomes the recognition that development plans should facilitate biodiversity enhancement to help address the nature crisis.

We support the intention that Environmental Impact Assessments (EIA) and subsequent Habitat Management Plans and/or Land Management Plans should shift from a 'do no harm' approach to a 'make things better' approach.

If such an approach is to be successful, much more work is needed to identify and agree how this will be measured and evaluated. Without a robust approach to measurement and evaluation, there is a significant risk that the intention of this policy will be undermined by contention over how it should be applied and implemented.

We support clauses (a) and (b) but recommend the subsequent clauses require redrafting as it is unclear how the requirements within these clauses relate to existing requirements in the EIA and Appropriate Assessment process.

If this is not clarified there is a risk of creating a more complex and onerous system rather than establishing a streamlined system focused on a 'make things better' approach. It must be a key principle that only one Environmental Impact Assessment (EIA) is required throughout the planning process to facilitate this streamlined approach.

4. Policy 4: Human rights and equality

SR fully supports all actions that ensure Human rights and equality, but we are unclear why this policy is included in NPF4. The aspirations set out in the two clauses are comprehensively covered by equalities law and statutory guidance.

This policy says nothing other than that planning should comply with law and statutory policy. We appreciate that this policy has been included to signal the importance of human rights and equality but do not see how this policy does anything additional to promote them.

We would suggest that this policy could better strengthen the planning process by being refocused on providing guidance on how concerns expressed on matters material to planning should be considered particularly with regards to how representative those views are and whether they can be supported by scientific evidence.

5. Policy 5: Community wealth building

SR **mostly agrees** with the aspirations of Policy 5 relating to community wealth building. Our members question what Policy 5 means in practice and recommend that further clarity is required to avoid this approach becoming open to wide interpretation.

6. Policy 6: Design, quality and place

SR interprets the intention of Policy 6: Design, quality and place as being to advise on housing, business parks and small dwellings, such as sheds, where they are the primary development.

As this is open to interpretation, we are concerned that criteria aimed at the built environment will be applied in ways never intended to other developments such as renewable energy. To prevent such misinterpretation, this policy should be amended to clarify the development types to which this policy should and should not be applied.

Such clarification will prevent development types for which Policy 6 is clearly of limited relevance being held up due to this policy being applied without due consideration. Clarity on exceptions is also needed for infrastructure projects in rural areas where the majority of Policy 6 is not relevant.

7. Policy 7: Local living

SR **agrees** that Policy 7 relating to local living sufficiently addresses the need to support local living and the principles of creating 20-minute neighbourhoods across Scotland.

To deliver on the potential opportunities local living can provide to communities Policy 7 must enable low-carbon transport and low-carbon heat opportunities.

We recommend that an additional point is added to Policy 7 that plans should support the emergence of local energy cooperatives. Such support should be focused on enabling local groups to meet their energy needs and strengthen their community through owning and operating renewable energy generation such as rooftop solar PV.

8. Policy 8: Infrastructure First

SR **does not agree** that Policy 8 ensures that we make best use of existing infrastructure and take an infrastructure approach to planning.

We are deeply concerned that NPF4 fails to recognise that infrastructure is a necessary form of development in its own right and needs a supportive policy framework if it is to be delivered. Within the draft NPF4 infrastructure is regarded only as something which is included in housing or other built forms as enabling development.

We highlight that there is a significant risk, particularly with grid investment being development led, the infrastructure first requirement cannot be delivered for renewable energy generation.

9. Policy 9: Quality homes

SR **agrees** with the approach of Policy 9 relating to quality homes and the principle of high-quality affordable homes that contribute to a Just Transition for Scotland. Quality homes must be low-carbon future proofed and include low carbon heating, solar solutions and energy efficiency measure that meet the needs of people throughout their lives.

10. Policy 10: Sustainable transport

SR **agrees** with the approach of Policy 10 relating to Sustainable transport. Our members note that our travel infrastructure must incorporate renewable energy generation to support low emissions and electric vehicles, for example solar panels on public buildings and car park roofs.

11. Policy 11: Heat and cooling

SR **mostly agrees** that Policy 11 will help us achieve zero emissions from heating and cooling our buildings and adapt to changing temperatures.

We are concerned that the current wording of this policy lacks clarity and risks creating uncertainties and loopholes. We recommend that Policy 11 is redrafted to apply a clearer sequential approach to the allocating of land and planning applications within Local Development Plans. Redrafting is also needed to avoid overlap between sub-paragraphs which should be moved into the supporting text rather than being included in the policy.

We recommend the rewording of this policy should be as follows to set out a clear hierarchical and logical approach:

- *Development proposals, including retrofit, should be designed and constructed to connect to existing heat networks.*
- *Where there is no existing heat network but one is planned, development should be designed to allow connection at a later date.*
- In all other cases, the development should provide a low or zero emissions heating system.

12. Policy 12: Blue and green infrastructure, play and sport

13. Policy 13: Sustainable flood risk and water management

14. Policies 14: Health and Wellbeing

15. Policies 15: Safety

16. Policy 16: Land and premises for business and employment

SR **do not agree** with the approach of Policy 16 relating to land and premises for business and employment.

We highlight that renewables is entirely omitted from this policy, all contributors that can help Scotland to achieve the net-zero targets set by The Scottish Government should also be incorporated into Policy 16.

17. Policy 17: Sustainable tourism

Our members highlight that Policy 17 must ensure Tourism becomes more sustainable in its own right and not simply be used as a constraint against other development.

18. Policy 18: Culture and creativity

19. Policy 19: Green energy

SR **does not agree** that this policy will ensure our places support continued expansion of low carbon and net-zero energy technologies as a key contributor to net-zero emissions by 2045.

As stated throughout our response, there is a fundamental mismatch between The Scottish Government's energy policy, particularly the draft OWPS, and NPF4. Policy 19 requires significant redrafting and should be renamed 'Renewable Energy' rather than using the misnomer title 'Green Energy'.

In terms of development planning, we welcome the spatial approach that Local Planning Authorities would be required to ensure that an area's full potential for renewable electricity and low carbon heat is achieved through new developments, extensions or repowering of assets. Additionally, it appears that Group 2 areas have been removed as per the approach in the Scottish Planning Policy, but this is watered down by the language used in Policy 19 (d).

Policy 19 (e) appears to be a directive for the support of repowering, extending, or expanding existing wind farms but again this is watered down due to the development management test. This section is stating that these types of development proposals will be acceptable unless they are deemed unacceptable. This is convoluted and does not provide the language required to rebalance our planning system to achieve net-zero.

Policy 19 (j) is overly restrictive with the construction methods proposed. This type of detail should be left to a condition of any consent as opposed to a direction from natural policy and we advocate this final sentence be deleted.

Policy 19 goes on to list various considerations (19 (k)) and states that these will vary relative to the scale of a proposal and area characteristics. The considerations largely replicate those within the current SPP at paragraph 169.

The policy fundamentally lacks a development management test which goes beyond a simple judgement of acceptability of effects. Unless the policy is expanded to include such a test, recognising the status of the global climate emergency and indeed the national importance of renewable energy developments, then it would simply function in a similar way to the current SPP and would represent in many ways an unacceptable 'business as usual' approach.

Due to the significant redrafting required to ensure Policy 19 supports continued expansion of low carbon and net-zero energy technologies as a key contributor to net-zero emissions by 2045.

20. Policy 20: Zero waste

21. Policy 21: Aquaculture

22. Policy 22: Minerals

In response to Policy 22, SR highlights clause (e) that deals with borrow pits and could therefore be used in the assessment and control of particular wind farms which require onsite borrow pits. The policy on borrow pits requires compliance with clause (d) of the same policy, a lot of which is not applicable in the case of borrow pits.

The requirement for borrow pits to be subject to their own restoration bonds is of particular concern to the renewable energy industry. Policy 22 could usefully distinguish between borrow pits used in forestry for example which stay open over long periods of time and those which are only temporary for construction purposes. The latter should be exempt from Policy 22.

We have no further comment to make here as our interest is in Scotland's renewable energy industry.

23. Policy 23: Digital infrastructure

24. Policies 24 to 27: Distinctive places

SR could only agree with Policies 24 to 27 if they were supported by sufficient renewable energy generation.

25. Policy 28: Historic assets and places

SR acknowledges that Policy 28 will protect the historic environment but in doing so will render any development which impacts on it almost impossible.

As mentioned in our response to Policy 34 (Trees, woodland and forestry), this policy goes too far in the protection of assets, and visibly further than SPP. The proposed guidance surrounding Cultural Heritage is overly restrictive, causes issues and is more difficult to satisfy than that in SPP, this applies to Scheduled Monuments, GDLs and undesignated assets.

We note that Policy 28 in relation to scheduled monuments suggests in clause (h):

“development proposals which affect a scheduled monument should only be supported where they avoid direct impact on scheduled monuments and any adverse impacts upon their setting, unless exceptional circumstances can be demonstrated...Where it has been satisfactorily demonstrated that there are acceptable circumstances, impact on the monument or its setting should be minimised and mitigated as far as possible...”

We highlight that this proposed policy contrasts with the current SPP at paragraph 45 which addresses scheduled monuments and states:

“Where there is potential for a proposed development to have an adverse effect on a scheduled monument or on the integrity of its setting, permission should only be granted where there are exceptional circumstances”.

Therefore, the current SPP policy draws a distinction between the circumstances of having an adverse effect that would go to the integrity of the setting of a scheduled monument, and an adverse effect but not such that it would undermine the integrity of a particular setting. This draft policy does not provide any guidance on the matter of integrity and only refers to *“any adverse impact”*.

We highlight that the “exceptional circumstances” test is unquestionably difficult to satisfy and is a fundamentally problematic policy change. It is difficult to foresee any circumstances in which a wind farm development could be justified on an exceptional basis. If exceptional circumstances need to be engaged in relation to any adverse effects, then it would be an approach whereby probably most renewable energy developments would fail and indeed many other types of development within Scotland.

The current level of protection afforded to cultural heritage from indirect effects is too great and is limiting to development. Indirect effects on setting are temporary and when considered in relation to the global climate emergency should be given little weight when it comes to renewable energy generation.

Due to the significant redrafting required to ensure Policy 28 does not fundamentally undermine the continued expansion of low carbon and net-zero energy technologies as a key contributor to net-zero emissions by 2045.

26. Policy 29: Urban edges and the green belt

We acknowledge that Policy 29 relating to urban edges and the green belt are mostly not relevant to the renewables sector. However, in response to clause (b) it is unclear if development plans will retain Areas of Search given the lack of requirement for spatial strategies. In response to clause (c) there will always be other sites across Scotland where a wind farm development could be located, this therefore effectively prohibits renewable energy in the green belt.

We highlight that although renewable energy is mentioned as a possible exemption within Policy 29 it is subject to being in an identified search area. Given that there is no requirement to have search areas elsewhere in the draft NPF4, this is a significant oversight.

If wrongly applied this policy would prevent the development of necessary renewable energy infrastructure on the edge of settlements where it can be used efficiently and benefit local communities. We recommend that the wording within the brackets relating in Policy 29 should be deleted.

27. Policy 30: Vacant and derelict land

SR **mostly agrees** that Policy 30 will help to proactively enable the reuse of vacant and derelict land and buildings.

However, we note that the policy does not include specific mention of renewable energy and low carbon heat as routes to bring vacant and derelict land back into use. This is at odds with the Recommendations from the Vacant and Derelict Land Task Force made in September 2020.

We recommend that Policy 30 is redrafted to reflect the recommendations made in the Task Force's report Transforming Scotland's Approach to Vacant and Derelict Land and specifically includes renewable energy and low carbon heat in the policy text.

28. Policy 31: Rural places

SR **mostly disagrees** that Policy 31 will ensure that rural places can be vibrant and sustainable. We are concerned that the introduction of this policy encourages development whilst safeguarding and does not indicate a balancing exercise. Only clause (h) of this policy considers energy generation from renewable sources.

This policy should recognise that onshore wind and other renewable energy generation will be required throughout Scotland and will inevitably change some aspects of rural places. It is our recommendation that this should be considered acceptable in principle.

29. Policy 32: Natural places

SR **does not agree** that Policy 32: Natural Places will protect and restore natural places.

Planning records show that the majority of wind farm developments fail to achieve planning permission based on visual impact alone. The collective impact onshore wind deployment has on the global climate emergency, carbon rich soils, peatland, and biodiversity, are all positive impacts. However, these positive impacts have, to date, not changed the planning balance.

If The Scottish Government's commitment that "we must rebalance our planning system so that climate change and nature recovery are the primary guiding principles for all our plans and all our decisions" is to have meaningful impact, the current approach to determining onshore wind planning consents must change substantially.

Independent surveys commissioned by industry of people who live within a five-mile radius of a wind farm found that the majority, consistently within 70-80%, strongly support onshore wind. These findings are consistent with both industry and government commissioned surveys into attitudes to onshore wind that consistently show levels of support of 70% and above. A small vocal minority of our population, focused on visual impacts, are dominating the decision process. We acknowledge that the opinions of all stakeholders should be considered but need for collective action on the global climate emergency and the widespread support for onshore wind must unquestionably prevail.

We highlight that clause (i) sets out the development proposals for areas identified as Wild Land (per NatureScot's Wild Land Areas Map 2014). The policy wording is a fundamental change from the policy approach in the current SPP and rather than addressing issues with the SPP, the proposed new policy exacerbates the existing issues.

Clause (i) states that support should only given where:

- *"the proposed development cannot be reasonably located outside of the wild land area; or*
- *it is for small scale development directly linked to a rural business, or required to support a fragile population in a rural area; and*
- *a site based assessment of any significant effects on the quality of the area is undertaken, and use of siting, design or other mitigation minimises adverse impacts".*

With regards to the first bullet point, this test is not possible to meet. In effect, a developer would be required to undertake a sequential appraisal showing that there was no other available site within Scotland in which a proposed development could be reasonably located. As noted, this would be impossible to satisfy.

There are currently several SR members that have onshore wind schemes wholly located within Wild Land Areas and are therefore facing a very difficult new policy provision as a result of the draft NPF4.

This is a fundamental policy issue, as Policy 32 currently undermines the objectives of Policy 19 and The Scottish Government's wider energy policy, particularly the proposed Onshore Wind Policy Statement. If the significant issues with Policy 32 are not addressed and no development whatsoever can be accommodated within Wild Land Areas, The Scottish Government's target of an additional 8-12GW of onshore wind by 2030 is unlikely to be attained.

Due to the significant redrafting required to ensure Policy 32 does not fundamentally undermine the continued expansion of low carbon and net-zero energy technologies as a key contributor to net-zero emissions by 2045.

30. Policy 33: Peat and carbon rich soils

SR **partially agrees** that Policy 33 will protect carbon rich soils and supports the preservation and restoration of peatlands.

As an industry we are fully supportive of The Scottish Government's ambitions to protect our carbon rich soils and restore our peatlands back into an active state due to the vast carbon sink opportunities that they provide and their role in supporting nature recovery.

Within the planning system peat, peatland and carbon rich soils are often erroneously treated as synonymous. There is also no consistency in how peat, peatlands and carbon rich soils are defined and treated by different stakeholders within the planning system.

These issues are detailed in the report Carbon-rich soils, deep peat, and priority peatland habitat - Expert views on project level assessment, commissioned by Natural Power and endorsed by SR. We recommend that this report is used to clarify how peat, peatlands and carbon rich soils are defined within the NPF4 to prevent the perpetuation of the existing issues and ensure each of these unique attributes is addressed appropriately.

In collaboration with our members and NatureScot we have reviewed how onshore wind developed on peat, peatlands and carbon rich soil results in industry paying for protection, restoration, and management on the sites. We have clear evidence as highlighted above in outlined in the SR publication 'Wind power and peatland – Enhancing unique habitats', that the development of a wind farm on such sites is an effective mechanism for leveraging private finance into the improvement of our peat, peatlands, and carbon rich soils.

We highlight that as part of the test the draft NPF4 suggests that it must be demonstrated that no other sites are available across the whole of Scotland before developing on a carbon rich soil or peatland area. This excludes vast areas of Scotland, particularly remote rural areas, and removes potential job opportunities.

Where peatland / peatland vegetation is displaced this must be reintegrated into a functional peatland system, in accordance with the mitigation hierarchy and relevant biodiversity policies.

We observe the point above (p.109) does not provide clear guidance as to what is required to achieve this outcome. Furthermore, we note that reference to the Carbon Calculator has been removed.

SR welcomes the exception made for developments under Policy 33 whereby the following is allowed to be supported:

the generation of energy from a renewable source, where the proposal supports a zero carbon electricity system and will maximise the function of the peatland during its operational life and in decommissioning.

Due to the redrafting required to ensure Policy 33 does not undermine the restoration of our peat and peatlands by cutting off private finance for their restoration or undermine continued expansion of low carbon and net-zero energy technologies as a key contributor to net-zero emissions by 2045.

31. Policy 34: Trees, woodland and forestry

SR **mostly disagrees** with the approach Policy 34. As with Policy 28: Historic Assets, this policy goes too far and will over-protect trees, woodland, and forestry at the expense of critical development needed to deliver net-zero.

For example, the advice that development will not be supported if it has any adverse impact on hedgerows and trees of high biodiversity value is too stringent and will not allow for a needs case with mitigation proposals.

SR recommends that Policy 34 is redrafted to recognise that there will be cases where the best environmental option may not be to plant or replant trees, expand woodland cover, and protect existing woodland.

32. Policy 35: Coasts

SR **agrees** that developments near the coastline should take into account the potential for coastal flooding and erosion impacts and should be assessed in relation to their contribution to the blue economy reduction.

We highlight that offshore wind farm transmission cable landfall is considered in depth through the project consenting regime.

Part 4 – Delivering Our Spatial Strategy

To what extent do they:

- **meet housing needs, particularly those of older people and disabled people;**
- **support efforts to meet greenhouse gas emissions targets;**
- **improve health and wellbeing;**
- **repopulate rural areas;**
- **improve equality; and**
- **secure "positive effects for biodiversity"**

- **Interact with other Scottish Government strategies**
- **Conflict with other outcomes and state how these conflicts will be managed**

Please provide your views on each of the key delivery mechanisms

1. Aligning Resources

2. Infrastructure First

See response to Policy 8: Infrastructure First.

3. Delivery of National Developments

See response to questions 9 and 12 on National Developments.

4. Development Plan Policy and Regional Spatial Strategies

5. Monitoring

Part 5 – Annexes

1. Please provide your views on Annex A.

In response to Annex A we draw attention to our detailed response to Policy 19: Green Energy.

Our members are interested in the outcomes identified in clauses (e) and (f). In response to clause (e), we do not agree since the development management policies effectively prevent the majority of the development required to address the global climate emergency. Furthermore, these policies will prevent The Scottish Government being compliant with the net-zero targets set. In response to clause (f), the policies directly addressing the nature crisis are too overbearing, since the opportunities to secure positive effects via renewables development are negated by Policy 19: Green Energy for example.

2. Please provide your views on Annex B.

Any other comments on the NPF4 Draft

1. Do you have anything else to add in relation to the draft of the National Planning Framework (NPF4)?

Scotland has rightly recognised the emergency facing our climate, and we now have an ambitious net-zero target. To protect our environment and help it flourish for future generations we need to ensure that all levers of government are focused to establish how we can collectively achieve net-zero.

Renewable energy is Scotland's main source of electricity meeting 97.4% of. Scotland's gross consumption and playing a leading role in tackling climate change.

Scotland currently has 11.9GW of installed capacity with onshore wind accounting for 71% of this. Our industry already supports 22,660 Scottish jobs and an economic output of £5.2 billion a year.

The Climate Change Committee (CCC) calculates that the UK will need to quadruple the amount of renewable electricity deployed by 2050 in order to meet net-zero climate change targets.

Scotland has 25% of Europe's renewable energy capacity from wind and tidal power sources, with a further 10% of the continent's wave energy capacity and 85% of the UK's hydroelectric energy capacity.

Our abundant renewable energy resources mean we are not only more than able to meet our own energy needs, we also have the potential to export renewable energy to the rest of the UK and Europe.

Scotland's planning system determines how much renewable energy generation technology can be deployed and is critical to determining whether enough energy can be generated to meet net-zero.

Currently planning decisions can take years, with outdated policies requiring renewable energy schemes to prove that they are needed. The climate emergency means that there is no longer any question that we need more renewable energy developments, and a well-resourced planning system which can deliver a proportionate and timely consenting process is key to the delivery of net-zero.

Powering Scotland through renewable energy is in our long-term national interest and our planning system needs to provide explicit support for further deployment, and for the repowering of sites nearing the end of their operational consent. This must be considered by The Scottish Government during the National Planning Framework 4. As advocated in our Scottish Parliament 2021 manifesto 'A brighter future – priorities for next Scottish Government.

Improving our planning and processes can ensure that more companies want to do business in Scotland helping to create the jobs and prosperity our economy needs. As we build back from the pandemic harnessing our abundant natural resources – our winds, waves, tides, longer daylight hours and high rainfall – to strengthen Scotland's economy has never mattered more

To keep Scotland on track for achieving net-zero, we will require an additional 11GW of offshore wind and at least 12GW of onshore wind by 2030 to provide the electricity to decarbonise heat and transport. We need to ensure that our planning system is focused on meeting these ambitions as advanced in our recent campaign 'Beyond COP26 – next steps for Scotland's clean energy revolution.' This will ensure that we can deliver on our ambitions for onshore and offshore wind, providing opportunities for Scottish supply chain and ports, the creation of new green jobs and skills, and the ability to export clean energy beyond our borders. Achieving an additional 12GW of onshore wind will for example create £27.8 billion in GVA and 17,000 jobs across Scotland.

Renewable energy, unlike other energy sources, is homegrown, and therefore less susceptible to economic shocks and market volatility, protecting energy consumers. Putting renewable energy at the centre of our economy can help to future-proof our energy needs, ensuring our economy is more stable and resilient.

Renewables can also improve our wellbeing. No other energy source but renewables provides the opportunity for the improvement of health: by reducing reliance on gas boilers, petrol and diesel vehicles and fossil power stations which are enormously polluting, we can reduce the direct harms to our health.

Planning powers can also be used to support the pace of decarbonising Scottish homes and buildings. Scottish Renewables has recently called for 45% of our homes, and 25% of our commercial, industrial and public buildings from renewable sources by 2030. Despite the heating of buildings making up 42% of Scotland's energy use, only 11% of our heat comes from renewable sources or electricity.

The technologies needed to decarbonise heat are readily available, and with the right planning powers can be utilised to ensure that the heating of new buildings and homes are fully powered by renewable heat solutions. Doing so will build healthier communities by removing dirty fossil fuels from our heating systems, create green jobs and manufacturing opportunities, whilst helping to protect Scottish households against fossil fuel price volatility which is a key driver of fuel poverty.

As Scotland transitions away from fossil fuels, the growth of renewable energy provides the opportunity, if done correctly, to ensure every region and community across our nation benefits from a clean, sustainable and home-grown energy supply, with the economic, environmental and health benefits that brings.

Our industry agrees that climate change and nature recovery should be the primary guiding principles for all plans and decisions within the planning system. However, as we state throughout our response, this is not reflected in the text of the draft NPF4.

Our recommendation is that this should become the 'golden thread' running through the entire NPF4. In practice this means a fundamental rebalancing of planning towards net-zero and nature crisis objectives in the determination of all relevant applications, both in terms of the planning balance and for the timing of decisions. If the phrase 'primary guiding principles for all plans and decisions' is to have a meaningful impact, The Scottish Government must direct all decision makers, including themselves, to radically reform their approach to the planning balance.

A change of approach not seen since the 1940s Planning Acts is required, and quickly, if the word emergency is to have any meaning. We cannot have a repeat of the current situation where the presumption in favour of sustainable development in the SPP is continually challenged and/or overlooked in local policy and decision making.

While SR is fully supportive of the principles set out in the draft NPF4, significant redrafting of the text is needed to ensure NPF4 brings the consistency, certainty and speed of decision making needed in our planning system to respond to the climate change and nature recovery agendas.

Due to the significant redrafting required to ensure NPF4 does not fundamentally undermine the continued expansion of low carbon and net-zero energy technologies as a key contributor to net-zero emissions by 2045, **we would welcome the opportunity to discuss our recommendations on redrafting with the Committee.**

January 2022