



# PLANNING CONFERENCE 2025

27 MAY | GLASGOW

SESSION SPONSOR



TOUR SPONSOR



EVENT SUPPORTER



OFFICIAL MEDIA PARTNER



# WITH THANKS TO OUR SPONSORS AND SUPPORTERS

SESSION SPONSOR



TOUR SPONSOR



EVENT SUPPORTER



OFFICIAL MEDIA PARTNER



# **Mr Tom Arthur MSP**

**Minister for Employment and Investment  
Scottish Government**



# Achieving clean power by 2030 – a planning challenge

Chaired by Claire Mack, Chief Executive,  
Scottish Renewables



#SRPLANNING25

# Melanie MacRae

Deputy Director Clean Power 2030 Unit  
Department for Energy Security  
& Net Zero



#SRPLANNING25

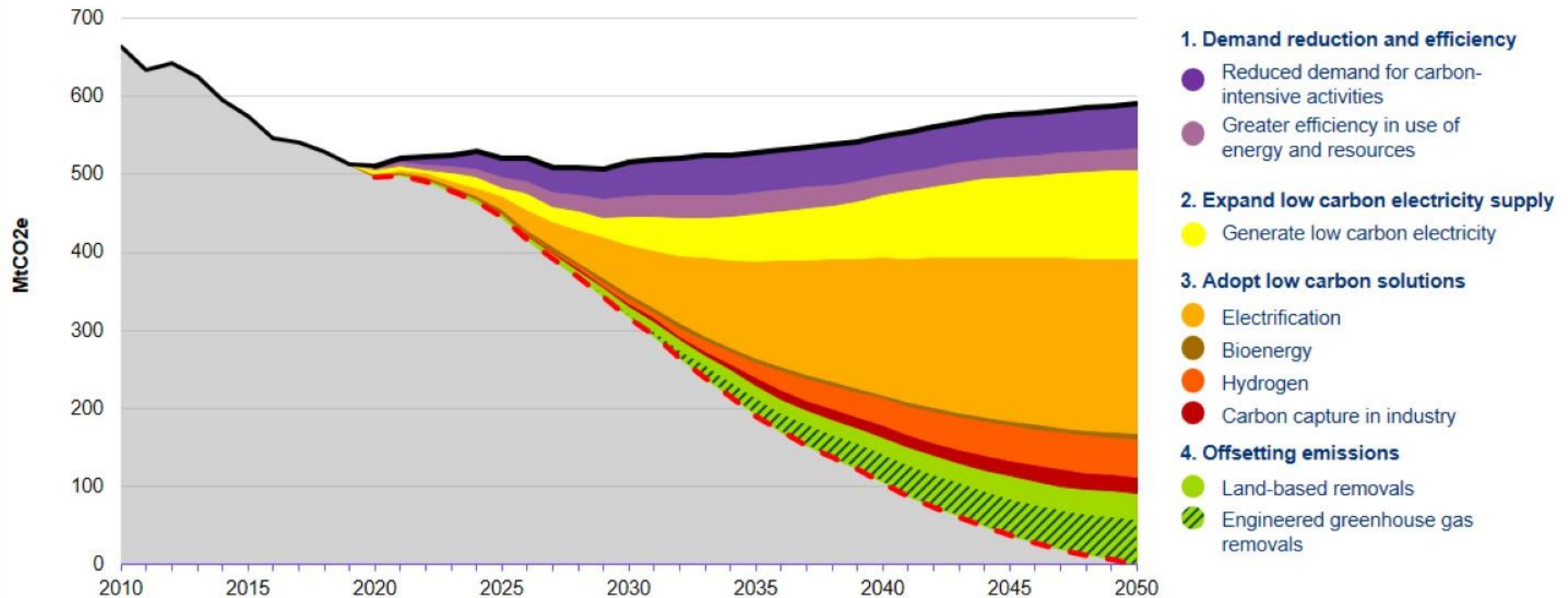
May 25

# Clean Power 2030

A new era of clean electricity

## Why Clean Power?

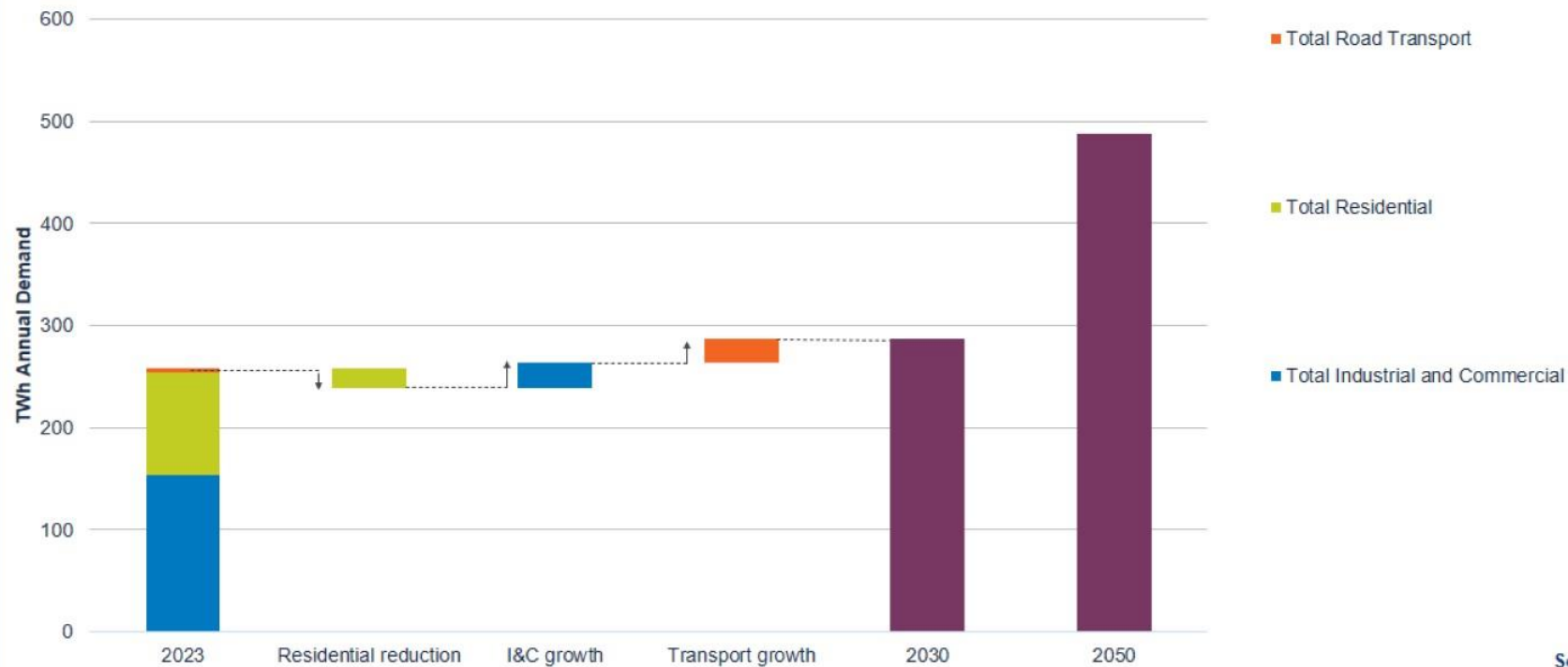
### Cross-economy abatement



Source  
CCC Analysis 2020

## Clean Power 2030

### Change in consumer demand by 2030



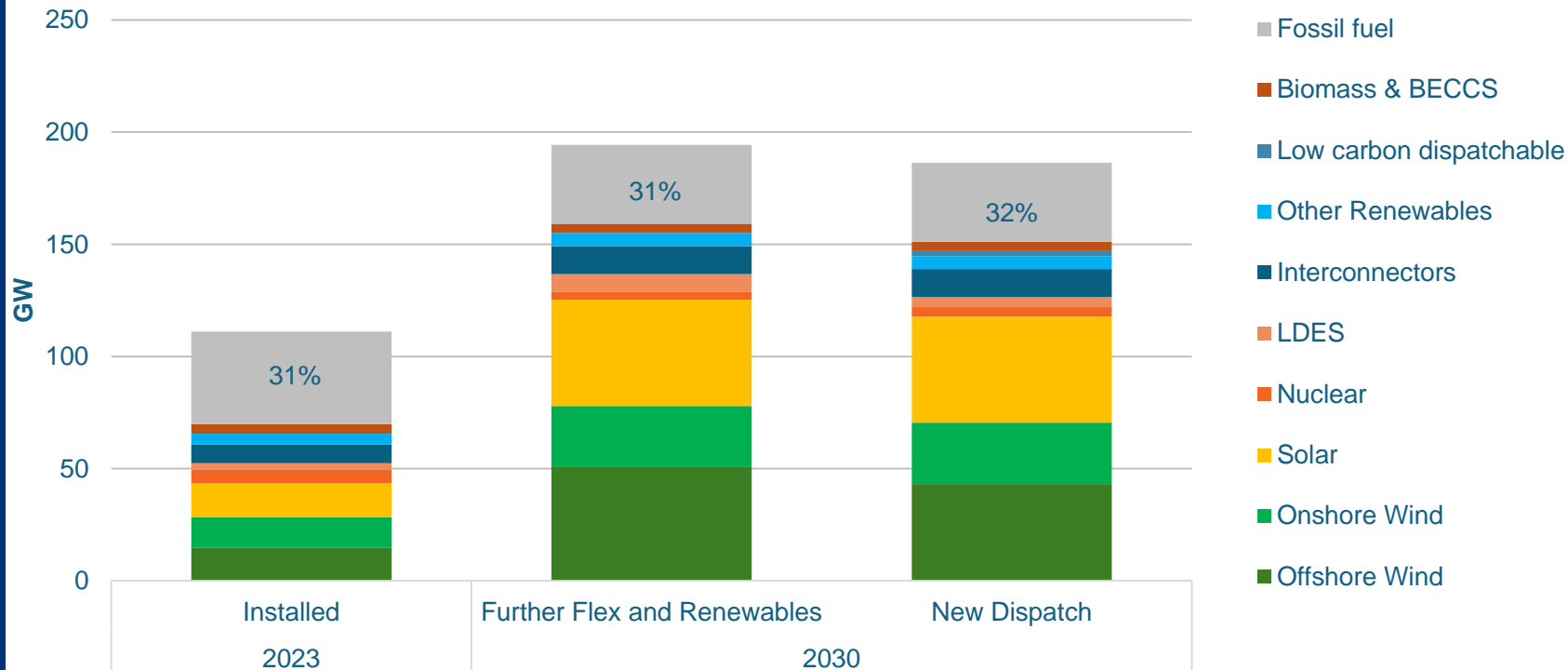
Source

NESO "Clean Power 2030: Advice on achieving clean power for Great Britain by 2030"



## Clean Power 2030

### Capacity mixes for 2023 and 2030



Source

NESO "Clean Power 2030: Advice on achieving clean power for Great Britain by 2030"

## Clean Power 2030

### Capacity range for 2030 (GW)

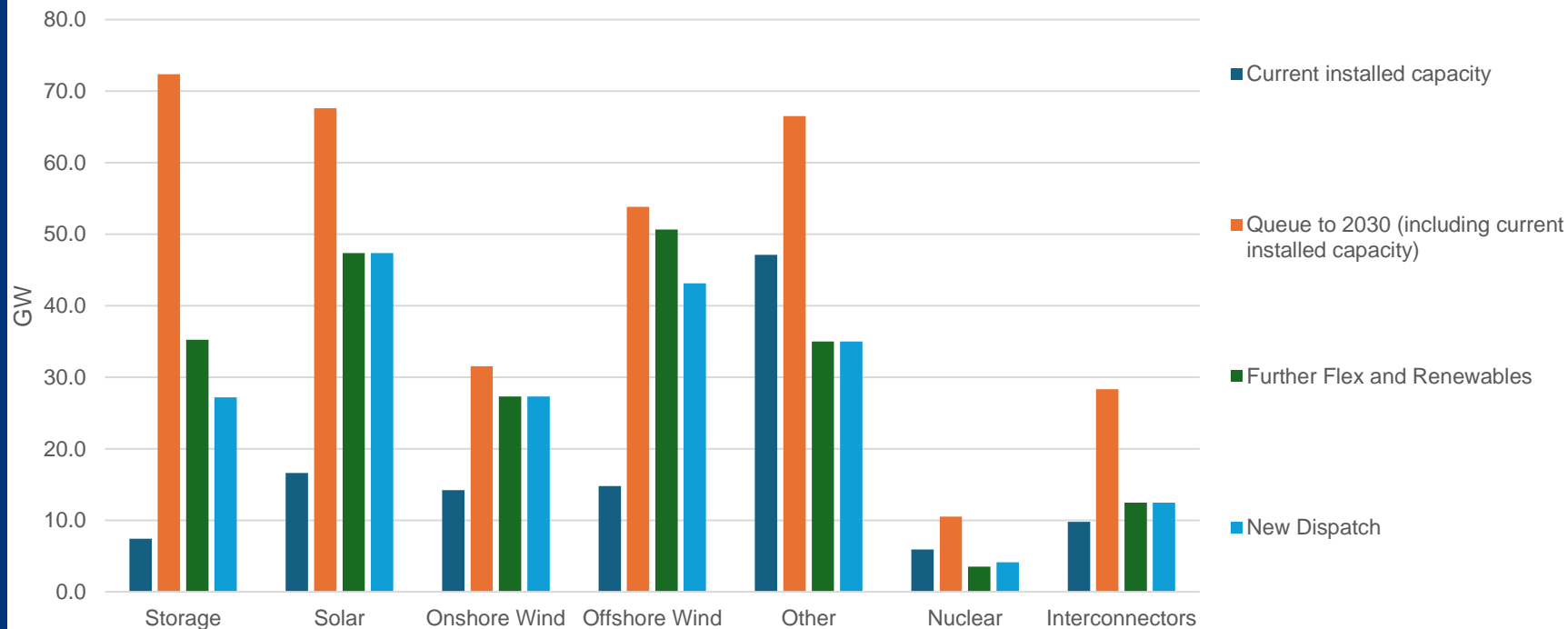
Technology	Current installed capacity GB	NESO 'Further Flex and Renewables'	NESO 'New Dispatch'	DESNZ 'Clean Power Capacity Range'	Scotland's regional capacity by 2030	Current operational Scotland	Planning pipeline Scotland
<b>Variable</b>							
Offshore wind	14.8	51	43	43 – 50	N/A	4.3	16.4
Onshore wind	14.2	27	27	27 – 29	20.5	10.3	14.9
Solar	16.6	47	47	45 – 47	2.9	0.7	2.3
<b>Firm</b>							
Nuclear	5.9	4	4	3 – 4	N/A		-
<b>Dispatchable</b>							
Low Carbon Dispatchable Power	4.3	4	7	2 – 7	N/A		
Unabated gas	35.6	35	35	35	N/A		
<b>Flexible</b>							
LDES	2.9	8	5	4 – 6	N/A		6.9
Batteries	4.5	27	23	23 – 27	7.5		21
Interconnectors	9.8	12	12	12 – 14	N/A		
Consumer-led flexibility	2.5	12	10	10 – 12	N/A		

Source

Clean Power 2030 Action Plan

## Clean Power 2030

### Current connections queue against GB clean power scenarios by technology



Source

Clean Power 2030 Action Plan

## Clean Power 2030

### 80+ transmission works by 2030

**88 wider works to bring benefits to the whole transmission system**  
 For meeting clean power target and reducing constraint costs

**80 works**  
 Must be delivered by 2030 to meet clean power

**8 works**  
 Acceleration  
 beneficial

**9 works**  
 Already built

**68 works**  
 On track

**3 works**  
 Must be  
 accelerated

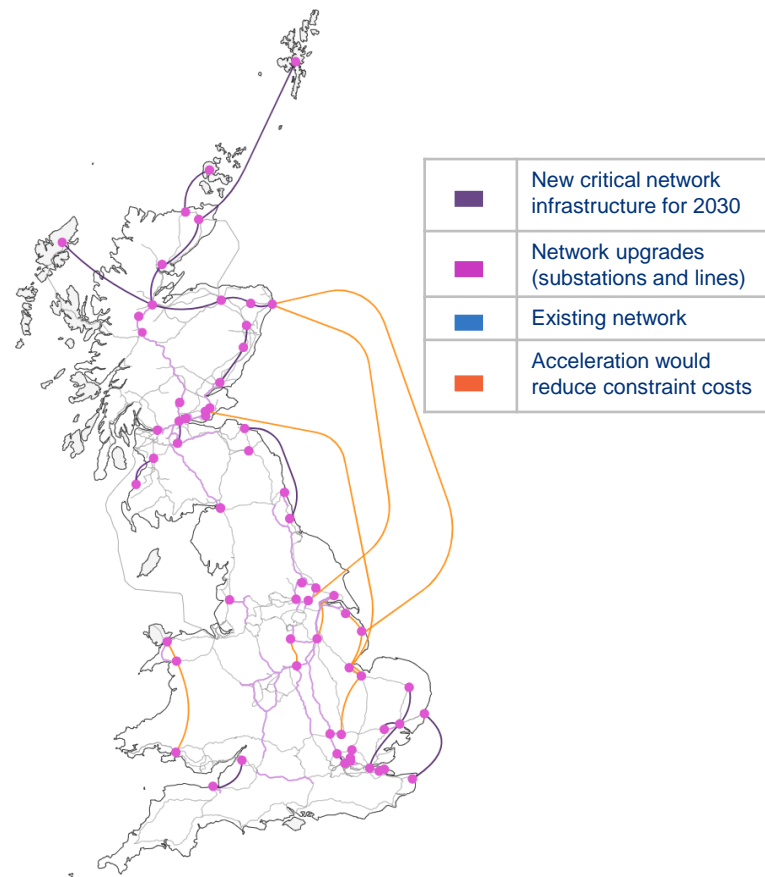
**4 works**  
 Stage 1 -  
 Scoping

**24 works**  
 Stage 2 -  
 Strategic  
 Optioneering

**16 works**  
 Stage 3 -  
 Design /  
 development  
 and consenting

**10 works**  
 Stage 4 -  
 Planning /  
 consenting

**17 works**  
 Stage 5 -  
 Construction



Source

Clean Power 2030 Action Plan

## Clean Power 2030

### GB wide planning reforms: Unlocking Clean Power by 2030

#### Key Planning Reforms



**Reforms to the electricity infrastructure consenting process in Scotland** – S36 and S37 Electricity Act (1989) - continue close joint working on the reforms being taken in the PIB and subsequent regulations



**Flexible Consenting Routes**  
NSIP Projects can be directed to alternate consenting routes if more suitable.



**Streamlined Consultation**  
Simplified NSIP consultation to support complex projects and reduce delays.



**Judicial Review Reform**  
Faster decisions by removing permission stages for meritless legal challenges for NPS and DCOs.

#### Recent Progress



**Onshore Wind Ban Lifted**  
De facto ban in England removed to enable more local renewable projects.



**NPS Consultation Underway**  
2025 NPS updates in consultation to speed up major energy infrastructure.



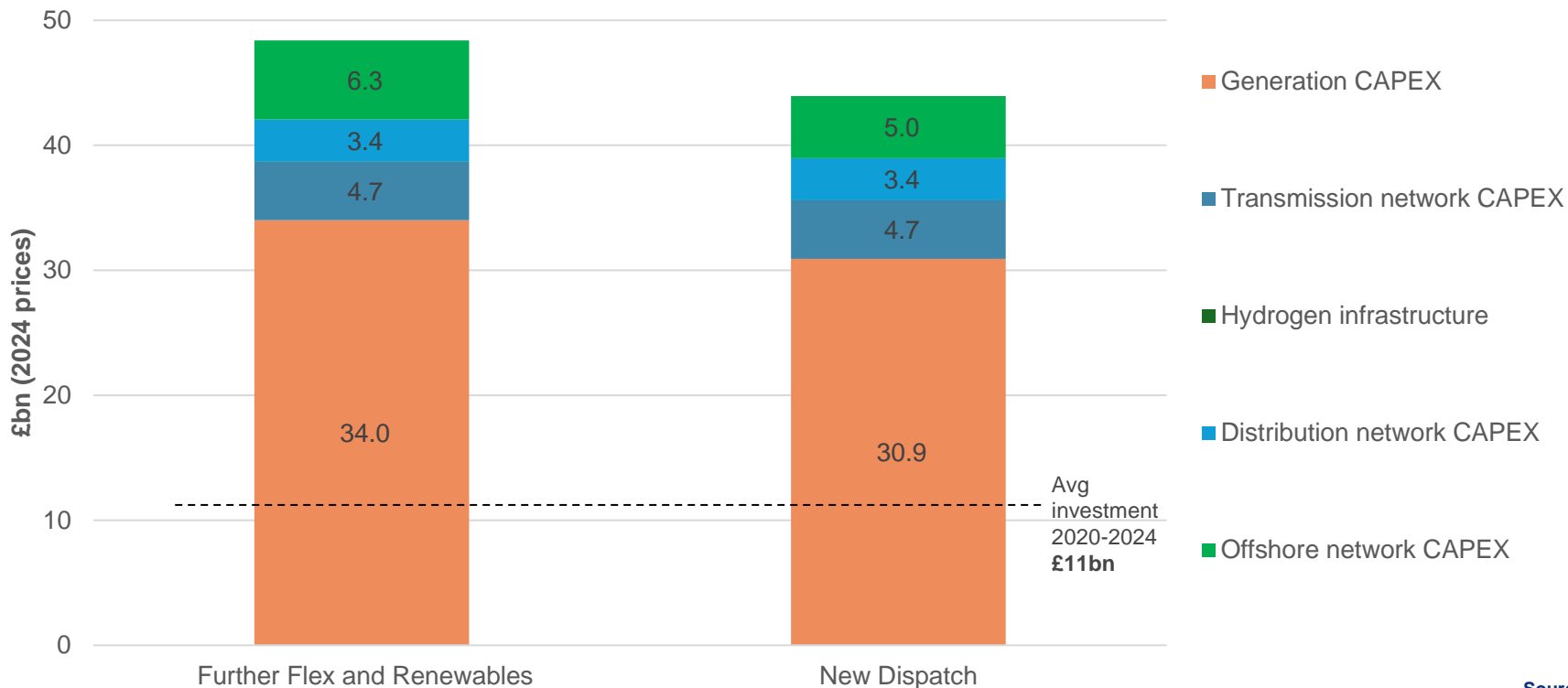
**NPPF Updates for Renewables**  
Dec 2024 changes mean more support for local renewable approvals.



**Clean Power Action Plan**  
Sets our ambitious package of reforms to our planning system.

## Clean Power 2030

### Average annual investment system costs in clean power pathways 2025-2030



Source

NESO "Clean Power 2030: Advice on achieving clean power for Great Britain by 2030"

## Clean Power 2030

A target, a plan and a mission

CP2030

- 95% of generation in 2030 from clean sources
- More clean power generated than total power consumed
- Less than 50g/kWh carbon intensity

Technology  
breakdown

- GW ranges for all major technology groups
- Split regionally for onshore wind, solar and batteries
- Hardwired into connections and planning reform

Clean Power  
Action Plan

- Public statement of intent
- Over 100 specific new policy actions



Technology	Current installed capacity <sup>(1)</sup>	NEO 'Further Flex and Renewables' Scenario	NEO 'New Dispatch' Scenario	DSNZ 'Clean Power Capacity Range' <sup>(2)</sup>
<b>Variable</b>				
Offshore wind	14.8	51	43	43 – 50
Onshore wind	14.2	27	27	27 – 29
Solar	16.6	47	47	45 – 47
<b>Firm</b>				
Nuclear	5.9	4	4	3 – 4
<b>Dispatchable</b>				
Low Carbon Dispatchable Power <sup>(3)</sup>	4.3	4	7	2 <sup>(4)</sup> – 7
Unabated gas	35.6	35	35	35 <sup>(4)</sup>
<b>Flexible</b>				
LDES	2.9	8	5	4 – 6
Batteries	4.5	27	23	23 – 27
Interconnectors	9.8	12	12	12 – 14
Consumer-led flexibility <sup>(5)</sup>	2.5	12	10	10 – 12







# Catherine Williams

Deputy Director, Directorate for Energy  
& Climate Change  
Scottish Government



#SRPLANNING25

## Deputy Director, Onshore Electricity Policy and Energy Consenting

## Deputy Director, Onshore Electricity Policy and Energy Consenting





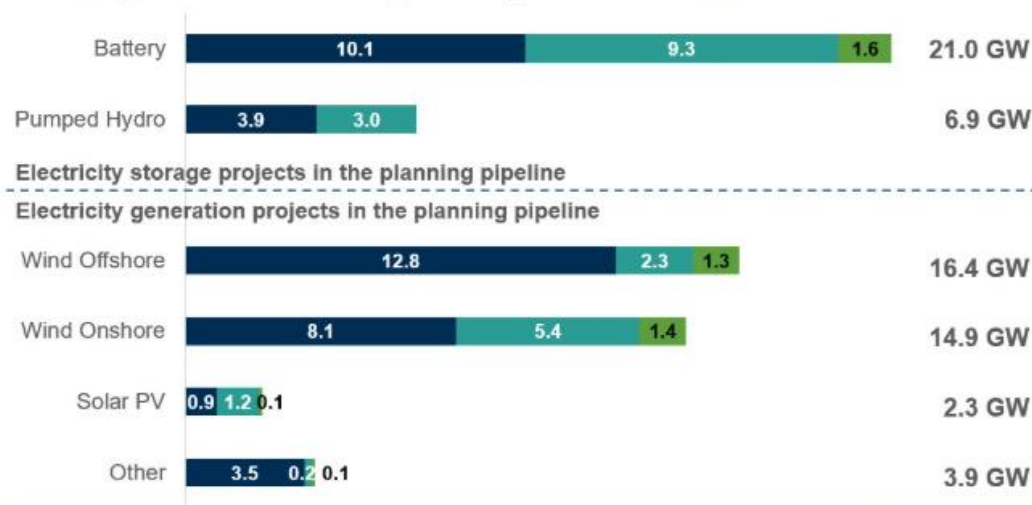
# Progress to date – pipeline

904 projects with estimated capacity of 65.4 GW

## Estimated capacity (GW) by technology and planning stage for renewable electricity projects in the planning pipeline

As of end December 2024

■ Application Submitted ■ Awaiting Construction ■ Under Construction



Source: DESNZ



Scottish Government  
Riaghaltas na h-Alba  
gov.scot

# Delivering the ambition

Improvements to planning system



Government ambitions



Grid investment



Costs



REMA , TNUOS etc



Public acceptance



Grid queue reform



Scottish Government  
Riaghaltas na h-Alba  
gov.scot

# John Boyce

## Development Director – Wind RES



#SRPLANNING25

# Alison Hall

Director of Project Development  
SSEN Transmission

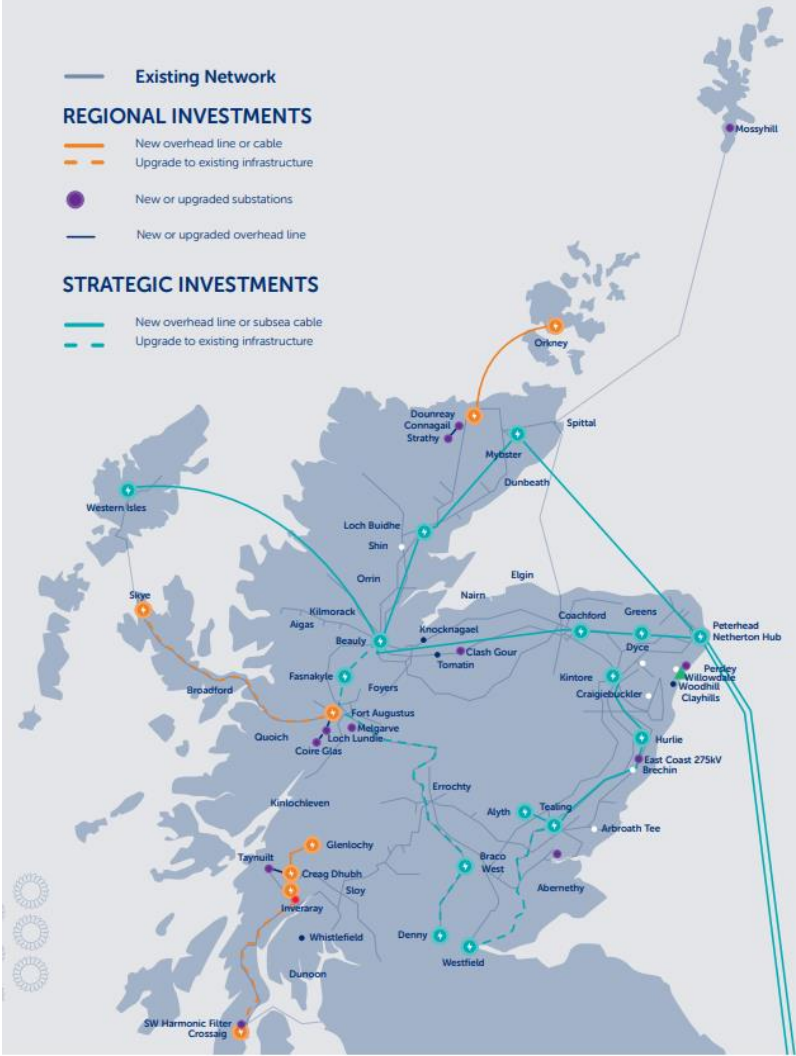
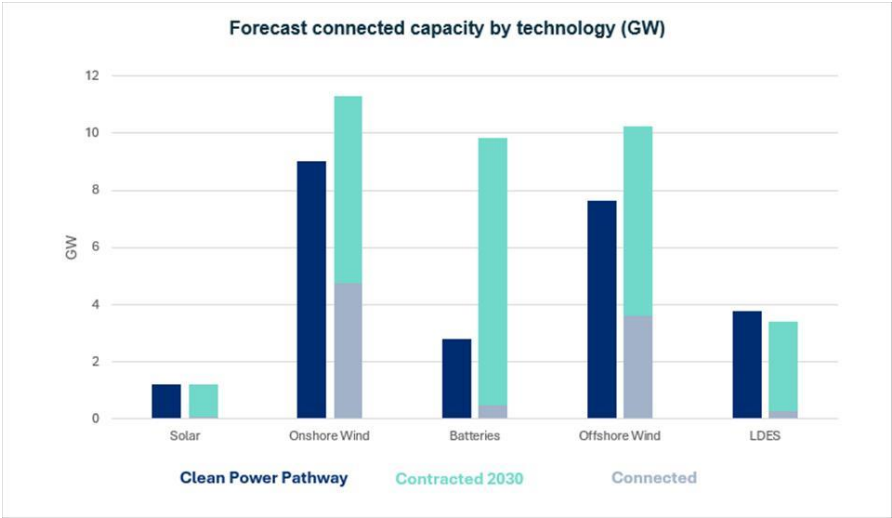


#SRPLANNING25

# SSEN Transmission

## OUR PATHWAY TO 2030

Clean Power 2030 Pathways:  
Targets by Technology





# OUR 2030 AMBITIONS



## Reliable Energy

**Zero** interruptions in electricity supply to homes and business due to our network

Our ambition is "to keep the lights on" for electricity consumers across the north of Scotland and beyond. We measure our success using the nationally agreed metric: incentivised loss of supply. Even when taking all cost-effective steps to prevent interruptions, rare events will occur.

The top priority of energy consumers and customer groups is safe, reliable and resilient electricity supplies



## Clean Power

Our network will have the capability to meet **20%** of the GB demand for clean power

National clean power pathways forecast that low and zero carbon generation in the north of Scotland will contribute around one-fifth of clean power by 2030. Our goal is to deliver the necessary transmission infrastructure to make that happen.

The UK Government has set targets for zero carbon electricity, and new renewable generators and flexibility providers expect timely connection

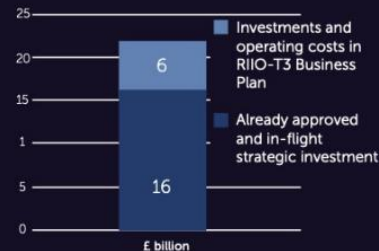


## Our Legacy

Drive investment in the energy transition that delivers **transformative lasting benefits** for local communities, our economy and nature

A just energy transition will be inclusive and equitable with people's needs at the centre. Based on an objective materiality assessment, we have set specific targets for the Pathway to 2030.

Communities, investors and other stakeholders expect us to act in a just and sustainable way; this is supported by Government and Ofgem



Clear and evidence-based case for total expenditure of **over £22 billion** during the RIIO-T3 period

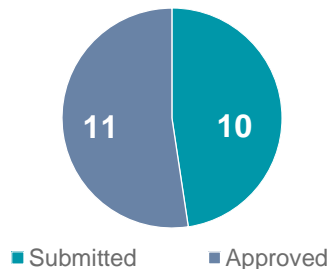
This cost will be paid through electricity bills spread out over the next four decades.

Our Plan identifies the potential for an additional £9 billion of expenditure, which could bring the total expenditure over the RIIO-T3 period to over £31 billion.

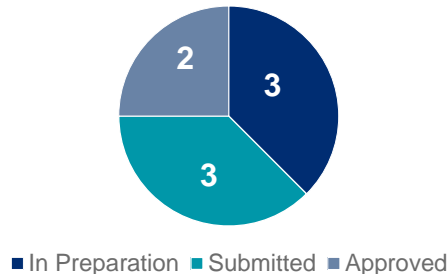
Our modelling shows that overall energy costs for the average consumer could fall by over a third during the energy transition

# OUR 2030 CONSENTING PROGRAMME

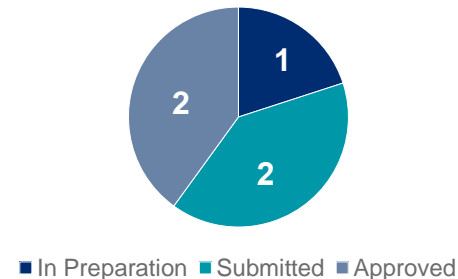
## Substation Consent



## Overhead Line Consents



## Marine Consents



Outstanding Substation Consents	Submission Date	Est Determination Date
Netherton Hub	Oct 2024	Jul 2025
Banniskirk Hub	Nov 2024	Aug 2025
Carnaig Substation	Nov 2024	Aug 2025
Emmock Substation	Nov 2024	Aug 2025
Hurlie Substation	Nov 2024	Aug 2025
Greens Substation	Dec 2024	Sep 2025
Bingally Substation	Feb 2025	Nov 2025
Fanellan Hub	Mar 2025	Dec 2025
Lewis Hub	Feb 2025	Nov 2025
Cambushinie Substation	Apr 2025	Jan 2026

Outstanding Overhead Line Consents	Submission Date	Est Determination Date
Beaully-Peterhead 400kV OHL	Summer 2025	Summer 2026
Tealing-Kintore 400kV OHL (TKUP)	Summer 2025	Summer 2026
Spittal-Beaully 400kV OHL	Summer 2025	Summer 2026
Alyth-Tealing Reconductoring	Nov 2024	Nov 2025
Tealing-Westfield Reconductoring	Nov 2024	Nov 2025
Skye OHL	Sep 2022	TBC

Outstanding Marine Consents	Submission Date	Est Determination Date
Spittal-Peterhead Marine Cable	Jan 2025	Nov 2025
Western Isles Marine Cable	Feb 2025	Aug 2025
EGL 3 Marine Cable	Aug 2025	Aug 2026

# NAVIGATING THE CHANGING POLICY LANDSCAPE

## Priority Applications for Transmission Infrastructure

### Guidance

### Section 37 of the Electricity Act 1989

February 2025



**10% Net Gain in Biodiversity  
and no net loss of woodland  
on all new projects**

**Investing at least £100m in  
nature restoration**

## Planning and Infrastructure Bill

### EXPLANATORY NOTES

Explanatory note to the Bill, prepared by the Ministry of Housing, Communities and Local Government, are published separately as Bill 196—EN.

### EUROPEAN CONVENTION ON HUMAN RIGHTS

Secretary Angela Rayner has made the following statement under section 19(1)(a) of the Human Rights Act 1998:  
In my view the provisions of the Planning and Infrastructure Bill are compatible with the Convention rights.

### ENVIRONMENTAL STATEMENTS

Secretary Angela Rayner has made the following statements under section 20(2)(a) and (3) of the Environment Act 2021:

In my view—

- (a) the Planning and Infrastructure Bill contains provision which, if enacted, would be environmental law; and
- (b) the Bill will not have the effect of reducing the level of environmental protection provided for by any existing environmental law.



**Peat cells being formed and receiving peat from substation  
platform**

**Claire Mack**

Chief Executive, Scottish Renewables

**Melanie MacRae**

Deputy Director Clean Power 2030 Unit, Department for Energy Security  
& Net Zero

**Catherine Williams**

Deputy Director, Directorate for Energy & Climate Change,  
Scottish Government

**John Boyce**

Development Director – Wind, RES

**Alison Hall**

Director of Project Development,  
SSEN Transmission



#SRPLANNING25

# Accelerating progress – shortening consenting timelines

Chaired by Megan Amundson,  
Head of Onshore Wind & Consenting,  
Scottish Renewables



Network: TIC Conferences | WiFi Password: PollokPark

#SRPLANNING25

# **Finley Becks-Phelps**

## **UK Head of Development**

### **Nadara**



#SRPLANNING25

# Grant Douglas

## Head of Planning and Environmental Policy

### ScottishPower Renewables



#SRPLANNING25



# Barry Stalker

Head of National Planning Hub  
Planning, Architecture &  
Regeneration Directorate  
Scottish Government



#SRPLANNING25



# NATIONAL PLANNING HUB

**Barry Stalker**

HEAD OF NATIONAL PLANNING HUB

# NATIONAL PLANNING HUB

## Talk about

- Why is Scottish Government investing?
- What is the Hub?
- How can we help you?

# WHY SG INVESTING?

Launch

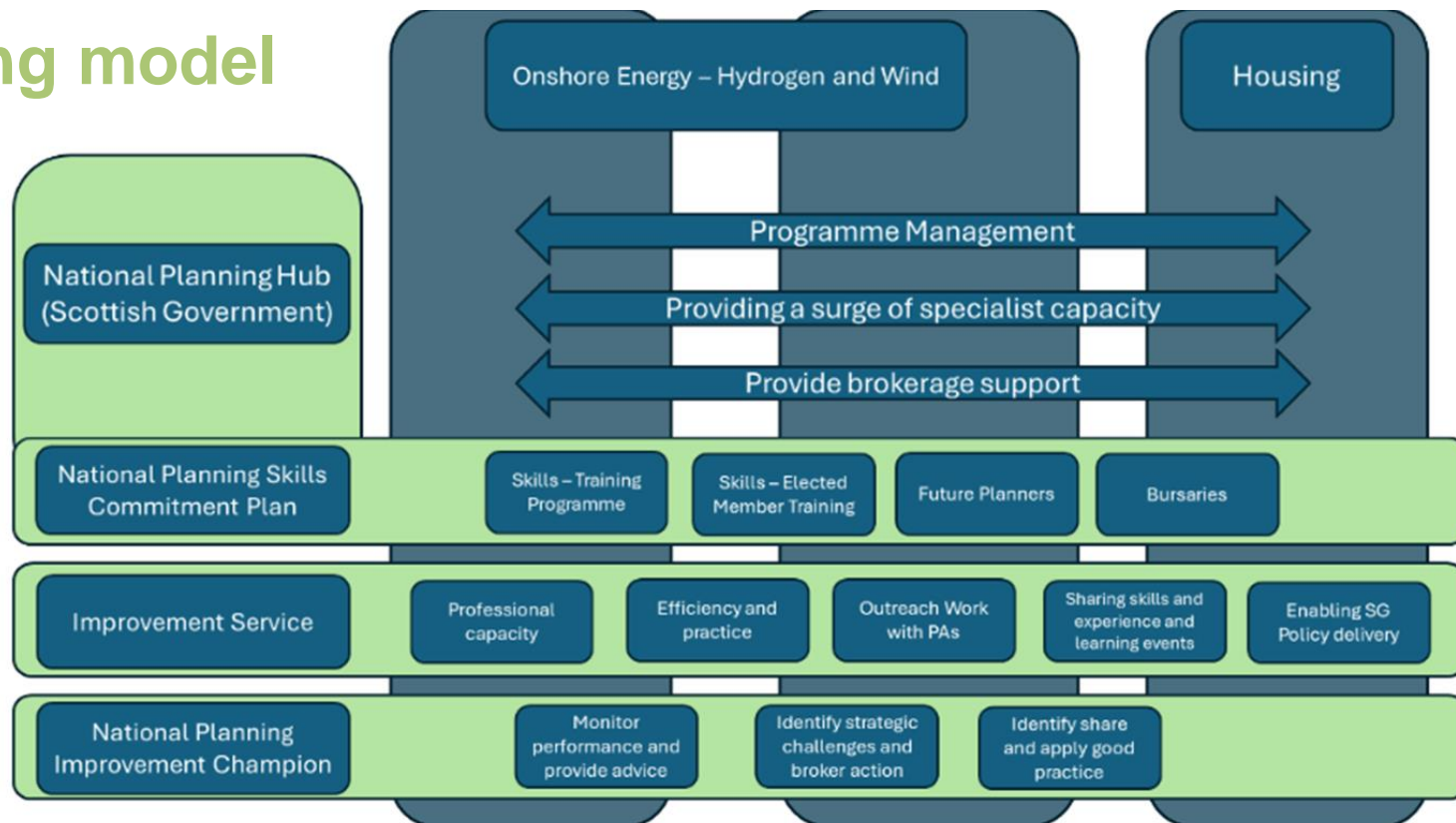


# WHAT IS THE HUB?

Here-and-Now



# Operating model



## recruitment inspo day

build  
connections

Thank you

# Neil Collar

Partner & Head of Planning Law  
Brodies LLP



#SRPLANNING25



# SHORTENING CONSENTING TIMELINES

NEIL COLLAR

MAY 2025

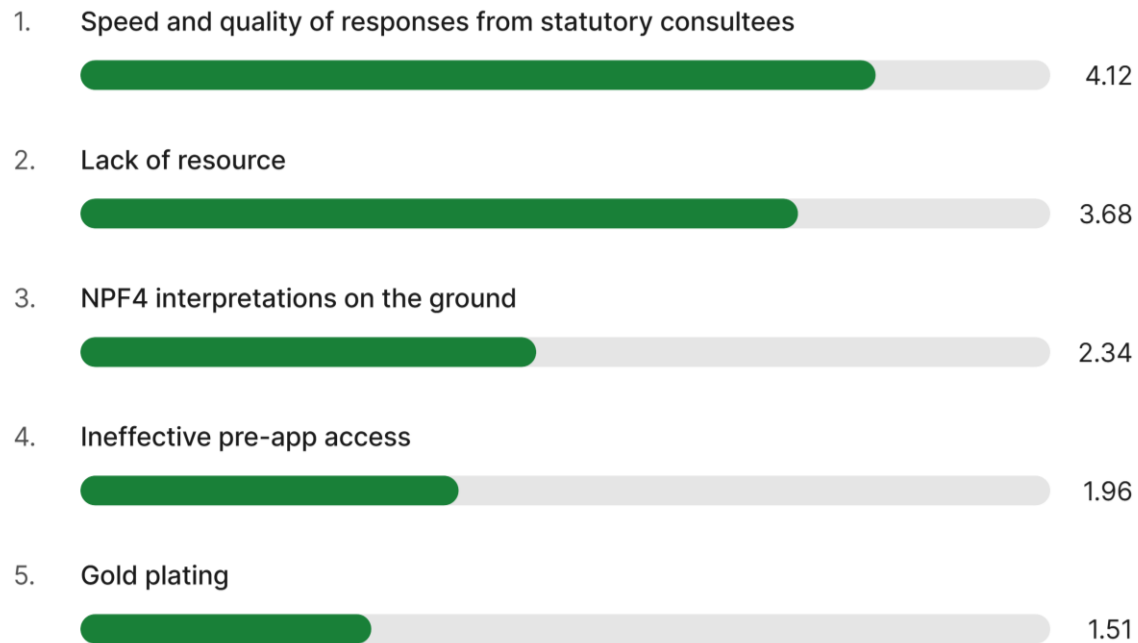


ENLIGHTENED THINKING

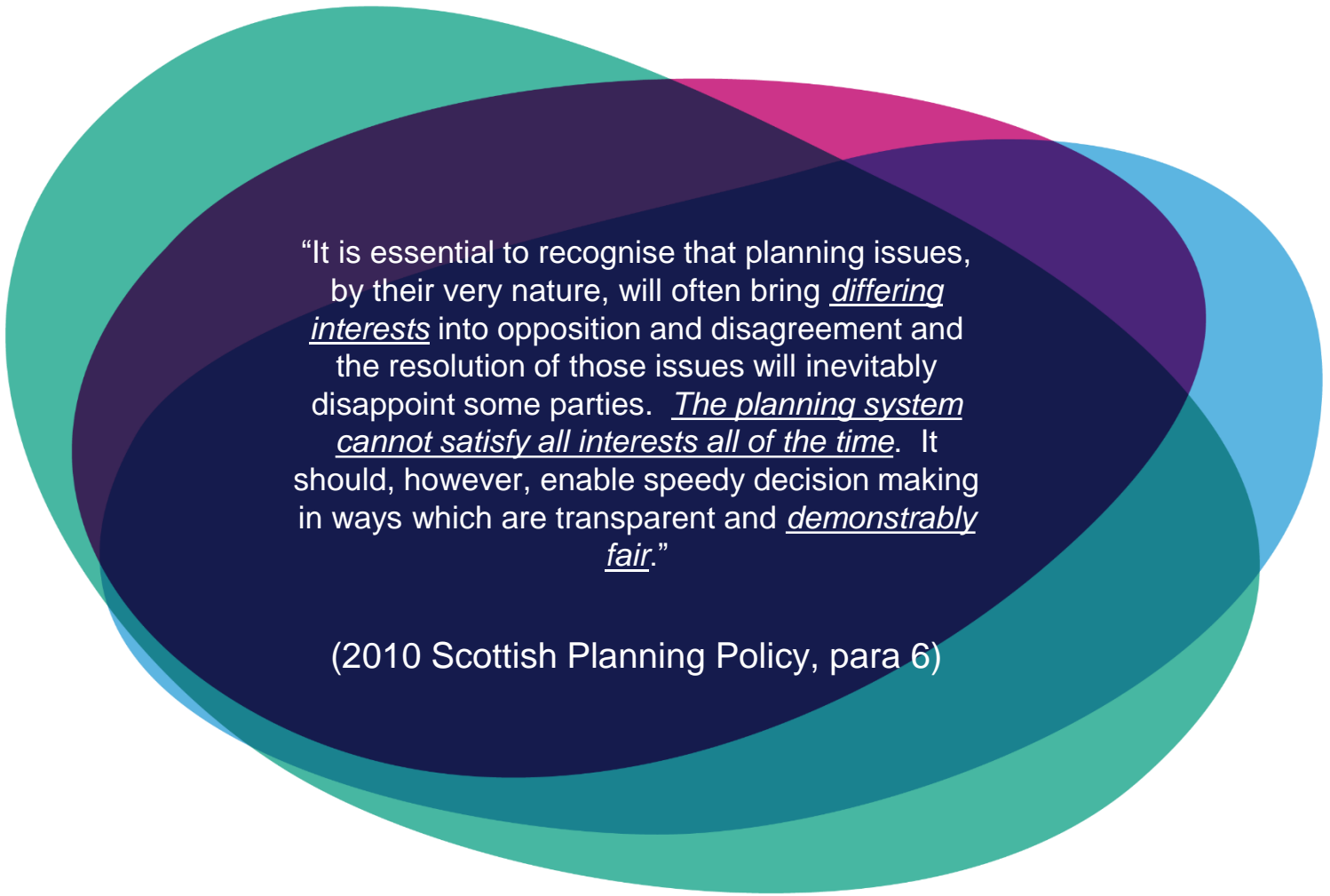


## Rank the following consenting delay factors in order of significance

Ranking Poll  68 votes  68 participants



slido



“It is essential to recognise that planning issues, by their very nature, will often bring differing interests into opposition and disagreement and the resolution of those issues will inevitably disappoint some parties. The planning system cannot satisfy all interests all of the time. It should, however, enable speedy decision making in ways which are transparent and demonstrably fair.”

(2010 Scottish Planning Policy, para 6)

- Staff recruited
- Standard section 36 consent conditions
- Priority Applications for Transmission Infrastructure
- Accelerating referring applications to DPEA, even if proposals for SEI
- Prioritising approvals????
  - only 1 refusal in 2025; 2 in 2024

**Megan Amundson**

Head of Onshore Wind & Consenting,  
Scottish Renewables

**Finley Becks-Phelps**

UK Head of Development, Nadara

**Grant Douglas**

Head of Planning and Environmental Policy, ScottishPower Renewables

**Barry Stalker**

Head of the National Planning Hub, Planning, Architecture & Regeneration  
Directorate, Scottish Government

**Neil Collar**

Partner & Head of Planning Law, Brodies LLP

Network: TIC Conferences | WiFi Password: PollokPark



#SRPLANNING25



# PLANNING CONFERENCE 2025

27 MAY | GLASGOW

SESSION SPONSOR



**Fred. Olsen Renewables**

# NPF4 – how policy is playing out on the ground

Sponsored by Fred. Olsen Renewables

Chaired by Megan Amundson,  
Head of Onshore Wind & Consenting,  
Scottish Renewables



#SRPLANNING25

# Jo Wotton

Associate Director, Environmental Planning  
LUC



#SRPLANNING25



**Scottish Renewables: Planning  
Conference**

**27<sup>th</sup> May 2025**

**Onshore Wind Sector Deal:  
EIA Task and Finish Group  
Update**

Prepared by LUC

Jo Wotton

Associate Director, Environmental Planning



# Onshore Wind Sector Deal for Scotland and Planning Objective



## Onshore Wind Sector Deal for Scotland

September 2023



*“The onshore wind sector deal sets out commitments from the Scottish Government and the onshore wind industry to deliver upon our collective ambition of 20 GW of onshore wind in Scotland by 2030 whilst delivering maximum benefit to Scotland.”*

### Planning Objective:

*“We will reduce the time it takes to determine Section 36 applications for onshore wind projects by increasing skills and resources and by **streamlining approaches to scoping Environmental Impact Assessment Reports (EIARs) by using template formats and associated guidance.**”*

# OWSD EIA TFG Members and Focus Groups

## Consultees:

- SEPA
- HES
- NatureScot

## Developers:

- SPR
- RES

## Legal experts:

- Marcus Trinick, KC
- Eversheds

## Consultants and EIA Practitioners:

- LUC
- Ramboll
- RSK
- Savills

## Focus groups (TFG, consultees, DPEA, practitioners):

- LVIA
- Historic Environment
- Ecology and Ornithology
- Hydrology and Peat
- Noise
- Traffic and Transport
- Planning and EIA Report Presentation / Format etc.

# OWSD EIA TFG Outputs

Guidelines on Streamlining  
Environmental Impact  
Assessment

May 2025

DRAFT



Scottish Government  
Riaghaltas na h-Alba

- Guidance on ‘overarching principles’ on ‘streamlined EIA’, along with notes on regulatory compliance and recommendations regarding the overall EIA process.
- Recommendations on the standardisation of approach to scoping and scoping to support a proportionate EIA Report.
- Recommendations on the standardisation and streamlining of the EIA Report.
- Topic specific ‘evidence notes’ which can be used to support the basis for streamlining both the scoping process and the EIA report.
- Recommendations for consultees and determining authorities.

# What happens next?

Scottish Government sign off

Publication, consultation, promotion and use of guidance

Industry buy in and commitment required to effect positive change

Proportionate EIA, reduce the burden on consultees and speed up determination to help meet the target of deploying 20 GW of onshore wind by 2030

# Simon Cleary

## Energy Transition Director BiGGAR Economics



# Socio-economic Impact Assessments of Energy Developments

Introduction to new guidance

---

**May 2025**

Simon Cleary





# Scotland's Fourth National Planning Framework

## Question 1

*Who thinks that their projects, or the projects that they support, are maximising the local socio-economic benefit?*







# New Guidance Covers 4 Themes



**Supply Chain**



**Skills**



**Community  
Empowerment**



**Environmental  
Protection &  
Enhancement**



# Assessment Criteria

The new guidance outlines the criteria to determine whether the benefits of a project are likely to be maximised

## Is it Place based?

- Every project and every community is slightly different so packages of benefits that are tailored around the needs and capacity of the community in question are likely to generate greater benefits than standardised approach.





# Assessment Criteria

The new guidance outlines the criteria to determine whether the benefits of a project are likely to be maximised

## Is it Innovative?

- Many of the benefits that have been realised by energy developments to date have happened because of innovation at the project level. To maintain this culture of continuous improvement it is important that developers to continue to innovate.





# Assessment Criteria

The new guidance outlines the criteria to determine whether the benefits of a project are likely to be maximised

## Is it Collaborative?

- Many of the benefits of energy developments are not directly within the gift of developers. They will require input and support of others in the public, private and third sector to realise, making a collaborative approach essential.





# Assessment Criteria

The new guidance outlines the criteria to determine whether the benefits of a project are likely to be maximised

## Is it Transparent?

- Effective collaboration requires the parties involved to trust each other, and an open and transparent approach is crucial for establishing this trust.





# Assessment Criteria

The new guidance outlines the criteria to determine whether the benefits of a project are likely to be maximised

## Is it Flexible?

- A lot can change between project inception and completion, and these changes can make a big difference to the benefits ultimately realised. A flexible approach that responds positively to such changes is therefore important.





# Assessment Criteria

The new guidance outlines the criteria to determine whether the benefits of a project are likely to be maximised

## Is it Deliverable?

- Providing communities with realistic expectations about what can be delivered during the construction and operation phase of a project will help achieve trust with relevant stakeholders. This will positively impact relationships for future renewable projects.





# Our Approach

To apply this guidance, BiGGAR Economics will complete an initial assessment of how the developers current approach meets the above criteria.

We then work with them to identify the areas for improvement, and how the developer can get to where they are to a position in which we can conclude they are maximising socio-economic benefits, in line with NPF4

	Supply Chain	Skills	Community Empowerment	Environmental Protection & Enhancement
Place based				
Innovative				
Collaborative				
Transparent				
Flexible				
Deliverable				
Key	Meets Requirement	Needs Improved	Significant Gap	





# Follow Up

## Question 2

***Who thinks that their projects, or the projects that they support, are maximising the local socio-economic benefit?***





# Simon Cleary

---

[simon@biggareconomics.co.uk](mailto:simon@biggareconomics.co.uk)



# Ida Bailey

Natural Capital & Nature Lead – Europe,  
Corporate Sustainability  
SLR



# Biodiversity Enhancement and Peatlands

Planning Renewable Energy Developments in Scotland

SLRCONSULTING.COM

May 2025





# National policy and legislation - NPF4 Scotland

Scotland's future places will be net zero, **nature-positive** places that are designed to **reduce emissions** and adapt to the impacts of climate change, whilst protecting, recovering and **restoring our environment**.

- Policy 3: a) Development proposals will contribute ... **enhancement of biodiversity**... restoring degraded habitats..... integrate **nature-based solutions**.....
- Policy 3: b) Development proposals .... that requires an EIA will only be supported where..... **enhance biodiversity**, including nature networks .....better state than without intervention.
- Policy 3: b, ii.) wherever feasible, **nature-based solutions** have been integrated .....
- Policy 3: b, iv.) significant **biodiversity enhancements** are provided, in addition to any proposed mitigation.....
- Policy 3: b, v.) **local community benefits** of the biodiversity and/or **nature networks** have been considered
- Policy 5: Where development on **peatland, carbon-rich soils or priority peatland habitat** is proposed .... iii. the likely **net effects** of the development on **climate emissions** and loss of carbon.
- Policy 10: c, ii.) **nature-based solutions** are utilised and allow for managed future coastal change wherever practical;
- Policy 14: Sustainable: Supporting the efficient use of resources that will allow people to live, play, work and stay in their area, ensuring climate resilience, and integrating **nature positive, biodiversity solutions**.

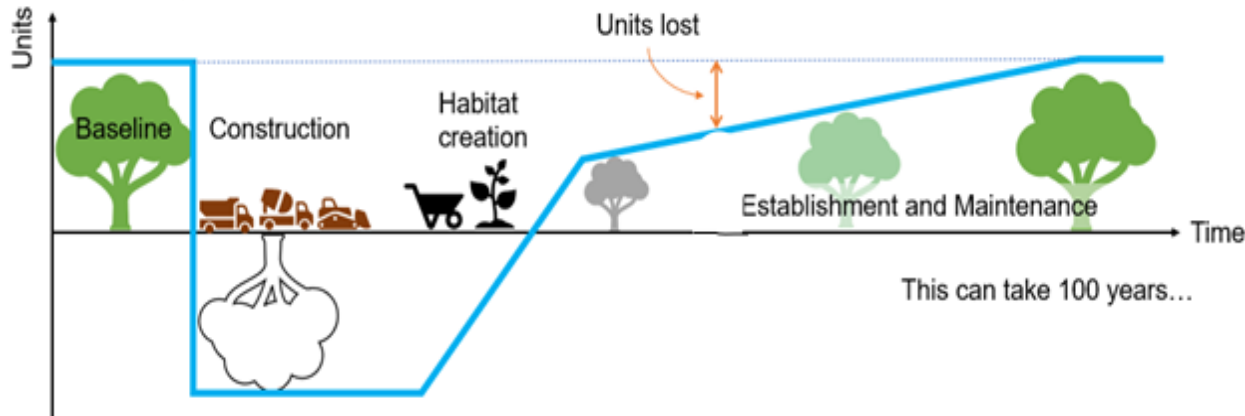




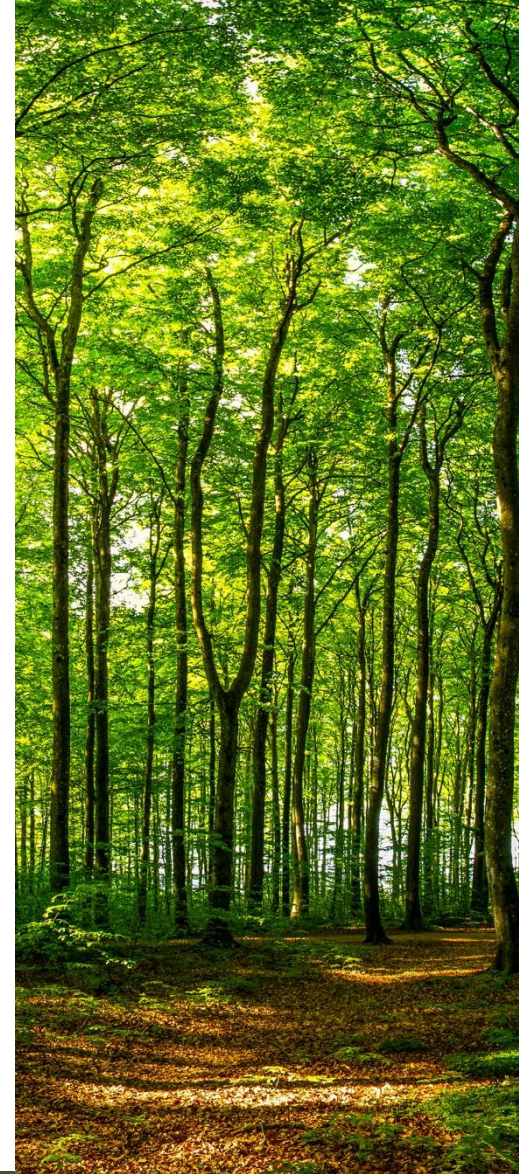
# What is Biodiversity Enhancement

**Biodiversity** – The variability among **living organisms** from all sources, including, inter alia, terrestrial, marine and other aquatic ecosystems and the ecological complexes of which they are part; this includes **diversity within species, between species** and of **ecosystems**.

## Biodiversity Net Gain (BNG)



- The statutory BNG metric in England uses a habitat only metric.
- Potential for additional requirements around species possible following Operation Wallacea methodology (currently out for consultation in relation to the woodland and peatland carbon codes)
- A metric for Scotland is anticipated, not clear yet what it will look like, the Statutory metric can have seemingly odd outcomes especially in relation to woodland
  - e.g. Caledonian woodland on heath = -80%





# Guidance on Peatlands

**Bogs and Peatland** = Definitions vary between sectors and parts of the UK, usually around arbitrary thresholds of peat depth (0, 30, 40, 50 cm etc...).

**Peatland** = Definitions vary but focus on % **organic** matter and **depth**. The type of vegetation they support is not relevant. **N-Scot Guidance**, Peat soils = >50cm & 60% organic matter, carbon rich soils = <50cm.

**Bogs** = Typically - must **support bog vegetation**. Must be **on peat**, depth specified in some guidance but not others. **N-Scot Guidance** follows **JNCC guidance on vegetation** and has no minimum peat depth.

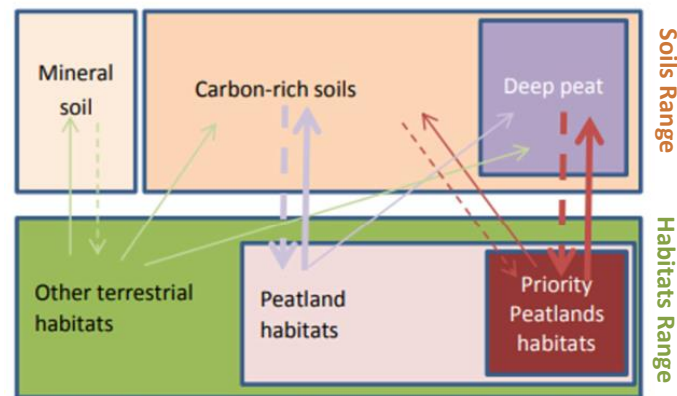
EUNIS guidance, which defines Annex 1 and priority Annex 1 habitats has no minimum peat depth threshold

## Nature Scot 2023 – Guidance:

Targets **carbon** and **biodiversity**: focus on priority peatlands

Refers to **NPF4 Policies 3 (biodiversity) & 5 (soils)**

- **Policy 5 d** (development on peatland), iii: the likely net effects of the development on climate emissions and loss of carbon.
- **Policy 3b** development that requires EIA .... enhance biodiversity
- Buffers, loss and restoration = **up to 30m**
- Compensation requirements = **1:10**
- Gain requirements = **10%**
- Restoration exclusions = **managing impacts inc. reducing muirburn and reducing grazing**





# In Practice - Peatlands and Planning Since 2023

**Feasibility Phase:** SLR is working with a client to undertake a peatland and biodiversity focused wind farm layout design really embedding the **avoid principal** of the mitigation hierarchy from the outset (in Ireland but driven by similar concerns to those we are seeing in Scotland).

**EIA Phase:** Restoration related carbon balance calculations, careful consideration of buffers distances. Acknowledge the **duality of policy areas** relating to peat (**carbon & biodiversity**).

**Consented Bettyhill Wind Farm: 1: 9.8** bog loss to restoration ratio finally agreed. Initially submitted in January 2023 with a suggested c. 1: 2.6 loss to restoration ratio, but THC and NS rejected this based on the subsequently published 1:10 guidance and the HMP was revised accordingly to enable consent to be granted.

**Consented – Earba Pumped Storage Hydro Scheme: 1: 8.4** bog loss to direct restoration ratio.

- Constraints on the area of restorable bog on site with a realistic chance of success.
- Additional restoration proposed for other habitats including extensive woodland and other habitat restoration considered likely to deliver a more substantial biodiversity gain overall.





# SEPA and Peatlands

SEPA are regulating re-use of peat and carbon rich soils within **Peat Management Plans**.

In addition, peat management and **habitat management** (peatland restoration) are increasingly overlapping with some calls for more oversight by NatureScot on peat reuse in restoration.

## Peat Management and Safeguarding

- Increased scrutiny of post-consent detailed peat **management** and peat **traceability**.
- Increased monitoring of construction phase peatland management – discussion regarding **PeatCOWs**

## Peat Reusability

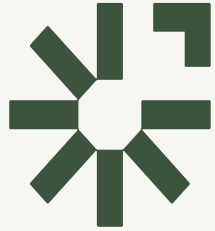
- Acrotelmic peat and upper catotelmic<sup>1</sup> (fibrous) up to H5 on von Post Humification Scale are considered **reusable** and amorphous peat (H9, H10) unsuitable.
- Leaves a big grey area of pseudofibrous peat.
- Catotelm and acrotelm are ambiguous terms unrelated to peat **strength** and the evidence base is generally qualitative regarding **reusability** and **transportability** leading to inconsistent application of policy.

## Peat use in Restoration

- Reducing options for peat reuse on track sides etc... & increasing requirement for peat reuse in restoration.
- Require best practice guidance for environments with an excess of peat.



<sup>1</sup>Mills, A.J. and Rushton, D. 2023. A risk-based approach to peatland restoration and peat instability. NatureScot Research Report 1259.



Making  
Sustainability  
Happen

SLRCONSULTING.COM

**Ida Bailey**

*Natural Capital & Nature Lead Europe –  
Corporate Sustainability*


**M** +7519 116 218

**E** [ibailey@slrconsulting.com](mailto:ibailey@slrconsulting.com)

# Euan Hutchinson

## Head of Planning & Environment Locogen



 Fred. Olsen Renewables

 LOCOGEN<sub>2</sub>



## Introduction

- Experience past and present
  - Policy
  - Wind (Fred. Olsen Renewables)
  - Solar (Locogen)
- Future
  - Where next (Industry)?
- Prepare for Audience Participation

## Policy – NPF4

### Policy 11 Energy

Policy Intent: **To encourage, promote and facilitate all forms of renewable energy development onshore and offshore.** This includes energy generation, storage, new and replacement transmission and distribution infrastructure and emerging low-carbon and zero emissions technologies including hydrogen and carbon capture utilisation and storage (CCUS).

Policy Outcomes: • **Expansion of renewable, low-carbon and zero emissions technologies**

### Comment

- Intention seeks to 'encourage, promote and facilitate renewable energy development'
- Policy 11e) vii. Requires project design and mitigation to demonstrate how impacts on the historic environment are addressed.
- Should therefore be possible to meet the intended policy outcomes.

## Policy – NPF4

### Policy 7 Historic Assets and Places

- Policy Intent: To protect and enhance historic environment assets and places, and **to enable positive change as a catalyst for the regeneration of places.**
- Policy Outcomes: • The historic environment is valued, protected, and enhanced, **supporting the transition to net zero and ensuring assets are resilient to current and future impacts of climate change.**
- • **Redundant or neglected historic buildings are brought back into sustainable and productive uses.**
- • **Recognise the social, environmental and economic value of the historic environment, to our economy and cultural identity**
- Intention seeks to 'enable positive change'
- Policy states Development proposals *'..... will only be supported when.....'* list of criteria can be met.
- Includes direct impact and impact on setting.
- Actual Outcome
  - Objections
  - Not supporting transition to net zero
  - Not facilitating development which could enable the enhancement of assets





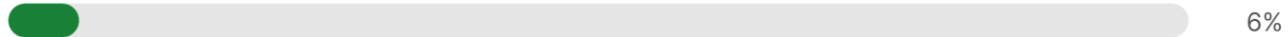
Based on your own experience would you agree or disagree that cultural heritage has grown as a constraining issue on renewable energy development in recent years?

Multiple Choice Poll   63 votes   63 participants

Agree - this is now an issue - 59 votes



Disagree - this is not an issue - 4 votes



slido

# Wind

## Recent Experience

- Inconsistent application of policy between HES and LPAs
- Seemingly increasing number of objections/refusals on cultural heritage grounds
- Most are based on impact on setting
- In some cases several kms from asset
- RFOs from LPAs in some cases based on local policy rather than NPF4
- Limited weight given to additional mitigation.

## Outcome

- c400MW of projects delayed for reasons including cultural heritage
- Contrary to NPF4, Sector Deal and achievement of targets.

# Solar

## Experience

- More focused on potential direct impacts on unknown assets.
- Different approaches in different areas.
- Mitigation = Trial trenching
  - Expensive, potentially damaging, unnecessary
  - Often requested up front (pre-consent)
  - Prohibitive for community and smaller scale projects.
- Setting of non-listed historic (including agricultural) buildings.

## Outcome

- Assessment levels on solar are becoming increasingly disproportionate and potentially prohibitive.
- Delays and threats to the viability of projects contrary to intention of policy.



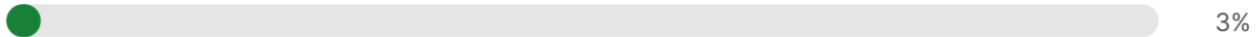
Based on your own experience of cultural heritage becoming an issue for renewable energy development, do you consider it to be an issue for wind, solar or both?

Multiple Choice Poll   64 votes   64 participants

Wind - 17 votes



Solar - 2 votes



Wind & solar - 45 votes



slido

## Future

Assuming this is a growing issue how should we start to address it?

Currently developers are operating alone and on a seemingly case by case basis.

If there is a need for industry to come together and address this, is this best aimed at:

- National Level, S36, HES, ECU, Scottish Ministers
- Local Level – Local Authorities, TCPA, Council Archaeologists
- Both



If there is a need for industry to come together and address this, which of the following is this best aimed at?

Multiple Choice Poll  68 votes  68 participants

National Level - S36, HES, ECU, Scottish Ministers - 12 votes



Local Level - Local Authorities, TCPA, Council Archaeologists - 5 votes



Both - 51 votes



slido



# **Carolyn Wilson**

## **Onshore Head of Consents & Environment UK & Ireland SSE Renewables**

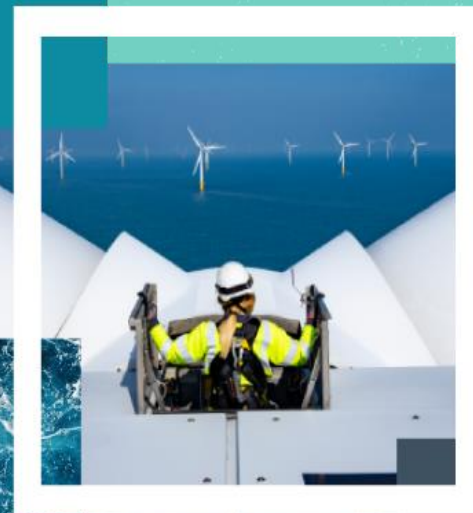
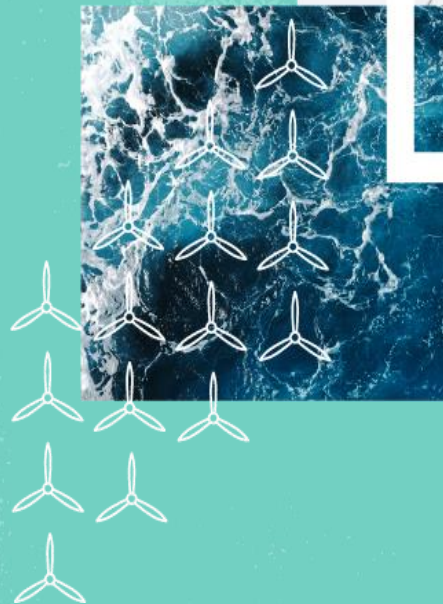


# NPF4 – How Policy is Playing Out on the Ground

NPF4 – Policy 2 Guidance

Section 36 Onshore Wind Standard Conditions

Tuesday 27<sup>th</sup> May 2025



# NPF4 –Scottish Government Policy 2 Guidance

NPF4 Policy 2 Climate Mitigation and Adaptation sets out that:

- ‘...development proposals will be sited and designed to minimise lifecycle greenhouse gas emissions as far as possible and adapt to current and future risks from climate change. Retrofit measures to existing developments for emissions reduction or climate change adaptation will be supported.’
- New Guidance prepared by Scottish Government with input from representatives of Heads of Planning Scotland, Scottish Futures Trust, the Institute of Civil Engineers, Key Agencies Group, the Improvement Service, Verture, the Institute of Environmental Management and Assessment and RTPi Scotland, **and Scottish Renewables**.
- **WHAT:** Covers all types of development but includes at Section 4.6 guidance for “Renewable electricity generation and mitigation” and 4.7 Peatland & Climate Mitigation.
- **WHEN:** “*We are currently finalising our guidance on climate change adaptation and mitigation and expect to publish this shortly*” (Chief Planner Letter 30th April 2025)

- The Planning (Scotland) Act 2019 introduced a requirement for our National Planning Framework to include an assessment of the likely impact of each proposed national development's lifecycle greenhouse gas emissions (GHG) on achieving national greenhouse gas emissions reduction targets.
- Local Development Plans will play a key role and guidance on this can be found at: [Local development planning guidance](#)
- Guidance sets out 4 key stages of lifecycle GHG assessment:
  - **Step 1. Identify: primary project emissions and removals**
  - **Step 2. Clarify control: understanding what emissions and removals can be controlled or influenced by the applicant**
  - **Step 3. Manage GHG emissions: minimising emissions and maximising removals**
  - **Step 4. Report: Reporting on outcome and monitoring (where relevant)**

- Contains clear and concise guidance on how to undertake lifecycle GHG emission assessment for various types of development before use (pre/during construction), during use/operation of development, and at end of life.
- References different existing industry standards and assessment methods which seek to address lifecycle GHG emissions, flexibility of approach.
- Calls for a proportionate approach to be taken by both developers and planning authorities and for dialogue in terms of required supporting information demonstrating how a project has been sited and designed to adapt to current and future risks from climate change.

### **Renewables Specific Advice:**

- **Section 4.6 provides guidance for renewable energy development including enabling works such as grid transmission & distribution infrastructure.**
- **Section 4.7 relates to peatland mitigation and advises continued use of the Scottish Government's carbon calculator (V.2.14) for Section 36 applications, until there is a replacement.**
- **ClimateXChange Report (July 2024) findings: the carbon calculator requires updating:**
- [Carbon Calculator for wind farms on Scottish peatlands | ClimateXChange](#)

# Section 36 Onshore Wind Standard Conditions

- Onshore Wind Sector Deal Commitment requirement.
- New process guidance and template can be found on Scottish Government website: Standard onshore wind conditions – section 36 consent and deemed planning permission: form and guidance - gov.scot
- What is the new process?
- Why will it reduce time in the determination process?
- Why use model/standard conditions: Planning Circular 4/1998: the use of conditions in planning permissions - gov.scot
- Voluntary process but will it bring benefits to applicants/developers?

# SSE Renewables Perspective

- Onshore Consents & Environment Team aligned with new process and will use it on submissions this year.
- Will encourage discussion with engineering, technical and construction teams earlier in design process to understand project condition requirements.
- Flexible process that front loads consideration of conditions and gets consultees thinking in a more targeted way to align with more efficient EIA process.
- Reduces need/time for conditions session at Inquiry and numerous cross-party discussions to get agreement at determination stage of application.



# ***Thank You for Listening***

Carolyn Wilson- Head of Onshore Consents &  
Environment UK & Ireland SSE Renewables:  
[carolyn.wilson@sse.com](mailto:carolyn.wilson@sse.com)

**Megan Amundson**

Head of Onshore Wind & Consenting,  
Scottish Renewables

SESSION SPONSOR

 **Fred. Olsen Renewables****Jo Wotton**

Associate Director, Environmental Planning, LUC

**Simon Cleary**

Energy Transition Director, BiGGAR Economics

**Ida Bailey**

Natural Capital & Nature Lead, Corporate Sustainability, SLR

**Euan Hutchinson**

Head of Planning & Environment, Locogen

**Carolyn Wilson**

Onshore Head of Consents & Environment UK & Ireland,  
SSE Renewables



#SRPLANNING25



# New technology, new challenges – consenting the next generation of projects

Chaired by Morag Watson,  
Director of Onshore, Scottish Renewables



#SRPLANNING25

# **William Summerlin**

## **Senior Development Manager**

### **Statera**



**#SRPLANNING25**



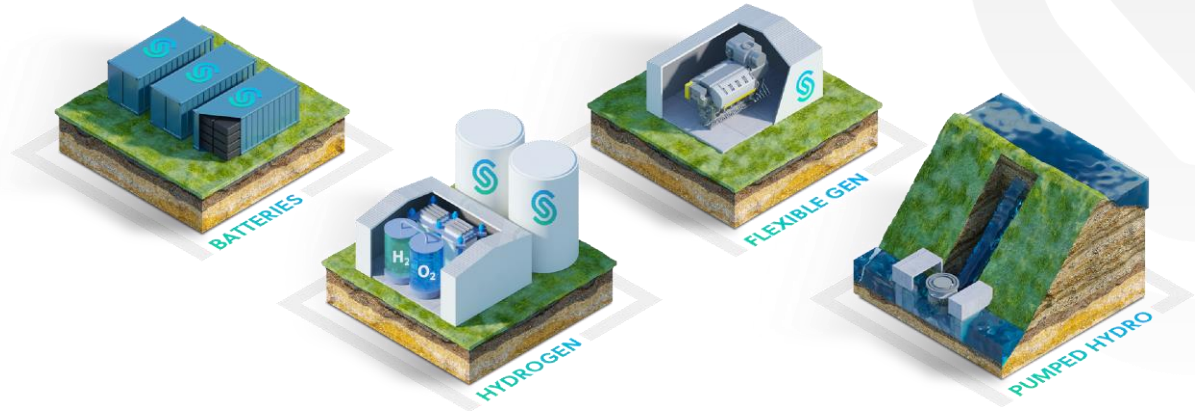
**STATERA**  
BALANCING THE GRID

# Kintore Hydrogen: New (and old) challenges



## An introduction to Statera Energy

Statera Energy develops, owns, and operates assets that provide critical grid balancing support to a renewables-led system, addressing the intermittent nature of solar and wind and the impact of seasonal variations on energy supply and demand.



### Develop

Over 8 GW of assets consented,  
100% originated in-house.



### Build & Finance

16 projects delivered in-house,  
totalling ~£1bn in capex, with  
£7bn planned by 2030.



### Operate

In-house O&M and asset  
management teams enhancing  
asset value



### Own

Over 1 GW existing  
operational portfolio with a 16  
GW pipeline of deliverable  
projects

## Kintore Hydrogen

# Critical infrastructure to support the energy transition

### The Challenge

#### Energy supply and demand are far apart

Renewable wind power is plentiful in Scotland but far from demand further south

#### Network capacity is falling short

The existing energy network does not have the capacity to serve increasing demand on the power system

#### High cost to maintaining an outdated system

Balancing distant supply and demand, and implementing network upgrades, comes at a high financial cost to energy users

### The Opportunity

#### High wind energy production potential in Scotland

UK target for 50GW of offshore wind by 2030 drives low power prices

#### National hydrogen network alleviates network constraints

Producing green hydrogen behind the B6 boundary reduces the need for network reinforcement and the cost of investment

#### Domestic energy independence through system balancing

Converting excess renewable energy can help decarbonise UK heavy industrial and power end users





## Overview

# Kintore Hydrogen

Kintore Hydrogen is a consented 3GW green hydrogen electrolyser facility in Aberdeenshire. The first phase of up to 500MW is planned to be operational before 2030.



**£1bn benefit** to the UK economy by 2035



**1.4m tonnes of CO2 saved** per year on average



**Up to 3,500** construction phase jobs



**£billions** of avoided grid reinforcement costs



**Up to 200** high quality operational jobs on-site



Backed by the **Net Zero Hydrogen Fund Strand 1**



**Economies of GW scale** achieved through efficiencies

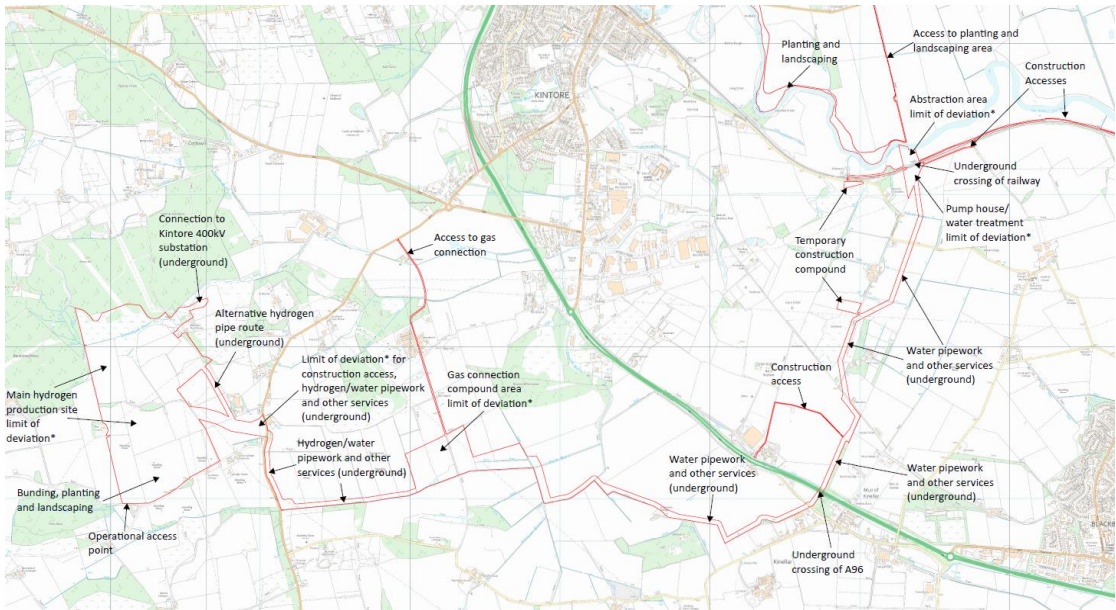


Enabling **net zero** and increasing **energy security**



# Consenting Utility Scale H2

## Challenges - Guess the AI image!



# Craig McLaren

## National Planning Improvement Champion

### Improvement Service



#SRPLANNING25





# New technology, new challenges – consenting the next generation of projects

Craig McLaren, National Planning Improvement Champion, Improvement Service

National Planning Improvement  
**Insights Report: Planning for  
Hydrogen**  
February 2025



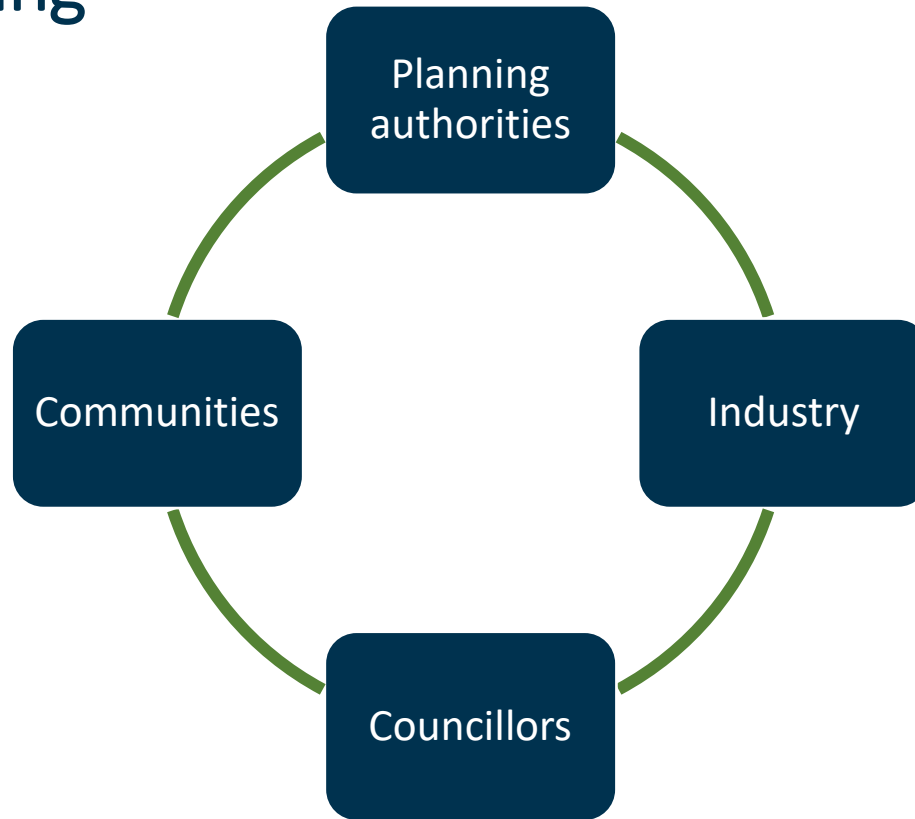
Engage with industry to understand barriers to delivering hydrogen projects and to discover their understanding of the Scottish planning system

Map what is needed on hydrogen planning at each stage; planning authorities' maturity; and knowledge and skills gaps

Develop analysis of the pipeline of hydrogen projects expected between 2024 and 2030, and keep this up to date

Identify and engage with expertise and resources that can be deployed to support planning authorities

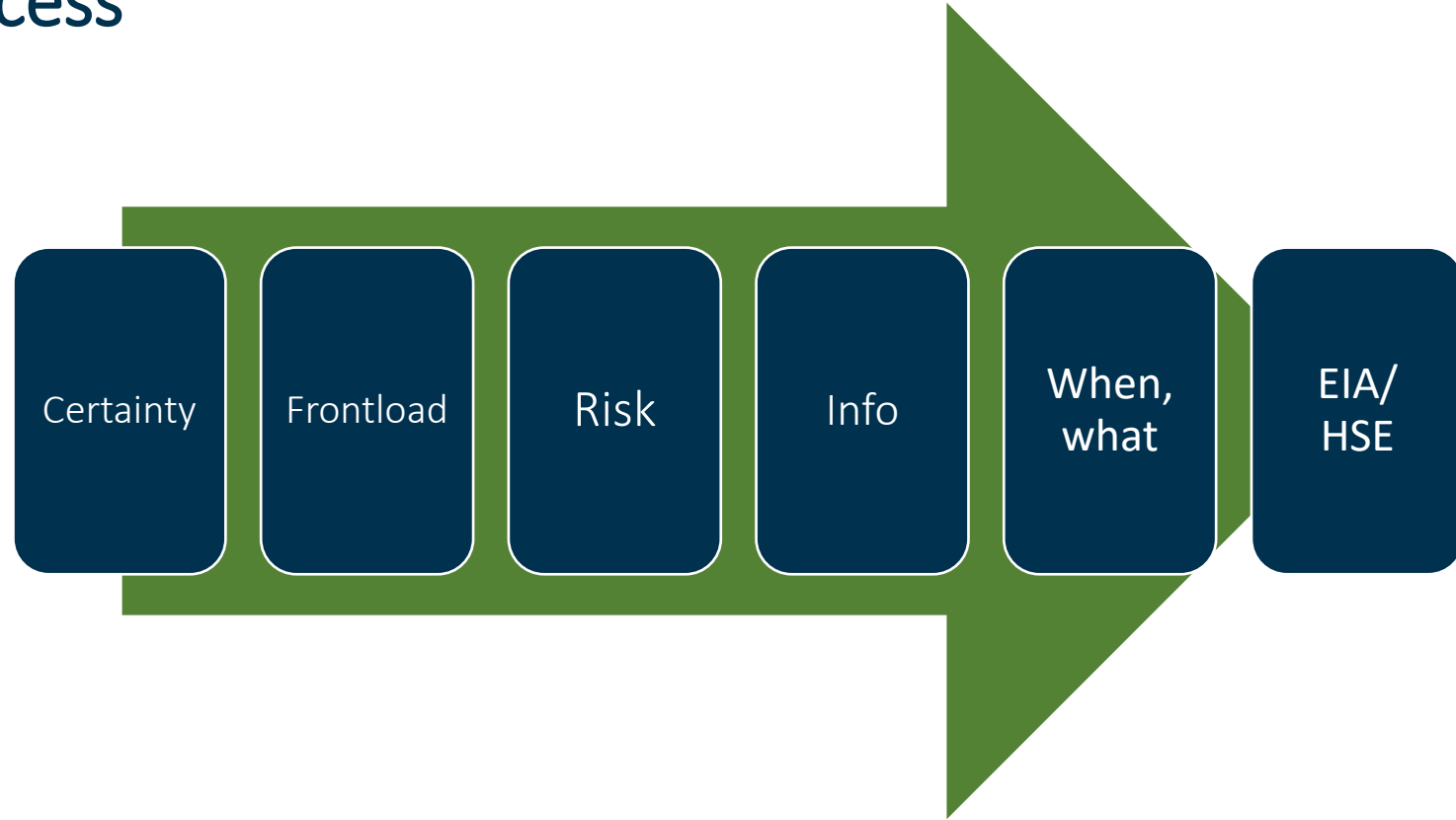
# Understanding



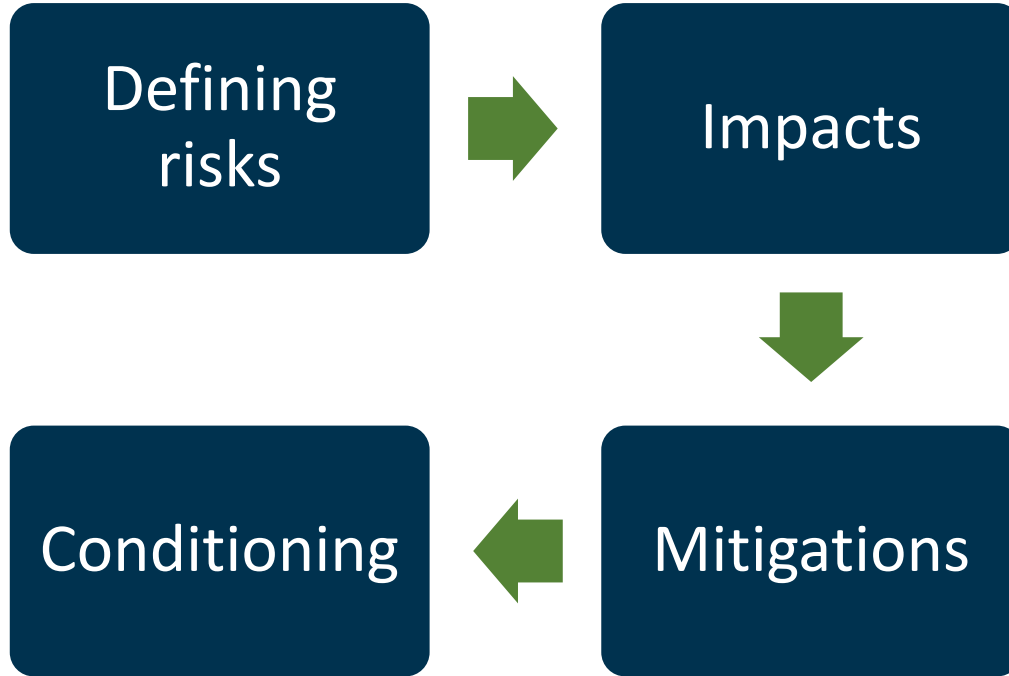
# Regulation



# Process



# Managing Risk



# Spatial



# Programme

## Insights programme

Insights Paper on Planning for Hydrogen

Scottish Government Guidance on Planning for Hydrogen roll out

Online Learning Modules

Explainer Programme for community councils

Hydrogen development pipeline

Large hydrogen sites programme



Access to Expertise programme	<p>Planning authorities access specialist skills and expertise</p> <p>Planning authority sharing resources</p>
Learning and Knowledge Exchange	<p>Advice on Early engagement for developers</p> <p>Knowledge Exchange Programme</p> <p>Learning Events</p> <p>Planning for Hydrogen Process map</p> <p>Risks, impacts and mitigation/ conditions</p> <p>Case Studies</p>

HAR 1

HAR 2

HAR 3

HAR 4?

LEARN/ PREPARE   ENGAGE/ PREPARE   ENGAGE/ LEARN/ PREPARE

# **Grant Douglas**

## **Head of Planning & Environmental Policy**

### **ScottishPower Renewables**



**#SRPLANNING25**

**Morag Watson**

Director of Onshore, Scottish Renewables

**William Summerlin**

Senior Development Manager, Statera

**Craig McLaren**

National Planning Improvement Champion, Improvement Service

**Grant Douglas**

Head of Planning & Environmental Policy, ScottishPower  
Renewables



#SRPLANNING25

# WITH THANKS TO OUR SPONSORS AND SUPPORTERS

SESSION SPONSOR



TOUR SPONSOR



EVENT SUPPORTER



OFFICIAL MEDIA PARTNER



# SCOTTISH RENEWABLES' EVENT CALENDAR



**VIEW ALL  
UPCOMING  
EVENTS**





# PLANNING CONFERENCE 2025

27 MAY | GLASGOW

SESSION SPONSOR



TOUR SPONSOR



EVENT SUPPORTER



OFFICIAL MEDIA PARTNER

