

Email: energyNPS@energysecurity.gov.uk

Department for Energy Security and Net Zero
55 Whitehall
London
SW1A 2HP
United Kingdom

May 29, 2025

To Whom It May Concern:

Response to the consultation on revised energy National Policy Statements

Scottish Renewables (SR) is the voice of Scotland's renewable energy industry. Our vision is for Scotland to lead the world in renewable energy. We work to grow Scotland's renewable energy sector and sustain its position at the forefront of the global clean energy industry. We represent 375 organisations that deliver investment, jobs, social benefit and reduce the carbon emissions which cause climate change.

Our members work across all renewable technologies, in Scotland, the UK, Europe 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. In representing them, we aim to lead and inform the debate on how the growth of renewable energy can provide solutions to help sustainably heat and power Scotland's homes and businesses.

SR appreciates the opportunity to provide feedback on the National Policy Statements (NPS). Overall, we support the NPSs' direction and focus on achieving ambitious net-zero targets.

While planning policy in Scotland is devolved, we recognise that energy policy is reserved, and the NPSs may impact S36 applications. For offshore wind projects, the NPSs may impact Scottish projects with grid connections in England. Therefore, we are providing feedback on a few points that may conflict with Scottish policy or be of concern to our members.

Clean Power 2030

We ask the UK Government to ensure that any policy statements it releases align with National Planning Framework 4 (NPF4) in Scotland to ensure we are moving toward a net-zero future together. Reaching net-zero throughout the UK depends heavily on renewable energy development in Scotland.

The consultation document states, *'Projects relevant for Clean Power 2030 can be deemed Critical National Priority (CNP), with a presumption in favour of consent'*. Tying planning weight only to projects relevant to CP2030 may conflict with NPF4 in Scotland, which explicitly states that grid capacity should not constrain energy generation development in the planning system.

The UK Government has acknowledged that more renewable energy deployment will be required post-2030. The Climate Change Committee's Seventh Carbon Budget indicates that the UK will need 37GW of onshore wind. However, the post-2030 deployment figures for onshore wind included in CP2030, drawn from the FES24, suggest that onshore wind deployment in Scotland will cease and deployment in England and Wales will more than triple. This is unrealistic regarding land availability, wind speeds and the current UK onshore wind pipeline.

To achieve 37GW of onshore wind, we must deliver the entire UK project pipeline with an attrition rate of just 9%. In recent years, the planning attrition rate in Scotland has been closer to 40%, which also illustrates the unrealistic nature of the post-2030 CP2030 figures.

The UK will need a robust pipeline of renewable energy projects beyond 2030, particularly in Scotland. Projects due to commission post-2030 will need to enter the planning system before 2030. It is essential that providing CNP weight to pre-2030 projects does not have the unintended consequence of hindering the development of post-2030 projects. Should CNP guidance be applied in Scotland rather than NPF4, it would create unnecessary barriers within the planning system at a time when projects needed for the next wave of long-term net-zero targets will need to go through planning.

A grid connection is essential for energy projects to achieve a final investment decision (FID). Where and when grid connections will be available post-2030 is yet to be clarified through the Strategic Spatial Energy Plan (SSEP) and Centralised Strategic Network Plan (CSNP). Creating a planning system that is prejudiced against post-2030 projects while the future availability of grid connections is still unknown will undermine the ability to achieve longer-term strategic energy plans. We recommend that the NPS create a presumption of consent for any renewable energy project, irrespective of specific policy documents unrelated to the planning system, as NPF4 in Scotland does. Policies will continue to evolve and new policies will be created, but none should be imposed on the planning system and the NPS should not

be tied to policies that change. This approach ensures that projects can continue to be consented while the SEP, CSNP and subsequent policies are developed.

Onshore Wind and Solar (EN-3):

- **Bird Monitoring** (2.12.46): Research happening in Scotland per the Scottish Onshore Wind Sector Deal is looking at the utility of ongoing bird monitoring at the Hagshaw Hill Cluster. The recommendation coming out of this research is likely to include less monitoring during onshore wind turbine operation due to the very low risk of collision. In addition, the research available over the last 20 years of ongoing monitoring has yielded very little useful information about protecting bird species. A series of recommendations will be available later this year.

With this in mind, we would discourage the UK Government from requiring regular bird monitoring during the operation of wind farms. Recommendations will be forthcoming that can better inform the direction of travel for bird monitoring during wind farm operation.

- **Peatland Guidance** (2.12.76): The NPS references NatureScot's Good practice during wind farm construction guidance. It is worth noting that NatureScot and SEPA are both updating policy on development on peat, disposal of peat, and biodiversity net gain through the Peatland Expert Advisory Group hosted by the Scottish Government. Policy around renewable energy development on and restoration of peatland will be updated over the next two years and the NPS should reflect this evolution.
- **Traffic** (2.10.118 and 2.12.112): The NPS requires a 'vision-led transport assessment' to determine cumulative impacts, which is a new and undefined term. More clarity is required on what this assessment would be and how to comply with it.

Grid (EN-5):

- **Coordination** (2.13.9-2.13.10): The NPS requires coordination amongst energy developers for grid landing points. While this often happens, the challenge will be when project completion dates are too far apart for meaningful coordination. This will mean that projects that are in early stages of development may not be willing or able to provide financial commitments and later stage projects may bear the cost for other projects as well. With wider, ongoing coordination of offshore wind farms being undertaken by the National Energy System Operator (NESO), greater clarity around specific elements of coordination within the developers' control would be welcome.

Scottish Renewables looks forward to working with you to ensure alignment with Scottish policy. Please do not hesitate to reach out should you have any questions.

Sincerely,

A handwritten signature in black ink, appearing to read 'M. Amundson', with a stylized, flowing script.

Megan Amundson
Head of Onshore & Consenting
Scottish Renewables