

Email: Developmentplan@pkc.gov.uk

Robert Wills
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Perth

October 17, 2025

Dear Robert,

Response to Renewable and Low Carbon Energy Planning Guidance Consultation Draft 2025

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 over 380 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 Perth and Kinross's (P&K's) planning guidance for renewable and low-carbon energy. We appreciate P&K's effort to provide clarity on renewable energy applications. However, we note that the transitional period to adopt supplementary guidance associated with local development plans (LDPs) as part of the statutory development plan has now passed. It should be noted that, if P&K adopts this guidance, it will be non-statutory and will not form part of the development plan.

Furthermore, this guidance goes beyond NPF4 rather than aligning with NPF4. In several places, the guidance is not compatible with or contradicts NPF4. It appears to have either misinterpreted or omitted clear guidance in NPF4 Policy 11 regarding renewable energy applications. All of this should be corrected throughout.

This guidance adopts an overall negative tone and approach to consenting renewable energy applications, which contradicts the importance NPF4 places on addressing the twin crises of

climate and nature. NPF4 Policy 1 dictates that significant weight should be given to the global climate and nature crisis, and proposals that contribute to renewable energy generation and greenhouse gas emissions reduction targets should receive significant weight. This guidance indicates that renewable energy applications will be deemed unacceptable where they do not meet specific technical requirements. This is inconsistent with NPF4, which requires decision-makers to balance the benefits of development with the need to tackle the climate and nature crisis. NPF4's approach should be referenced throughout this guidance, and attempts to use this guidance to create technical barriers should be resisted.

Renewable energy developments are a core component of Scotland's net-zero and energy-independent future, and applications are weighted accordingly within the planning system. This guidance creates more barriers to renewable energy developments than NPF4 allows, and it should be revised to ensure compliance with NPF4 rather than an interpretation of NPF4.

This document provides lists of requirements throughout, using strong language, such as developers 'must' adhere to requirements or they must ensure that conditions are 'not significantly adversely affected'. Neither the intent of these requirements nor their rigidity aligns with NPF4, which identifies that significant effects can still lead to a proposed development being supported, as noted in Policy 11 and Policy 4. NPF4 intentionally strikes a planning balance that needs to take into account the benefits of the proposed development, which can only be determined on a case-by-case basis.

NPF4 states that policy sections of the development plan should be read as a whole when determining planning applications. Decisions should be made in accordance with the development plan unless material considerations indicate otherwise. It is therefore for decision makers to determine the weight to be afforded to each policy. NPF4 Policy 11 clearly outlines the key considerations for renewable energy applications, specifying where separate considerations of key issues are required, namely Policy 4. This should be made clear in the guidance.

S36 and S37 applications

This guidance should make clear that the development plan is not the primary legislation against which decisions for S36 or S37 applications are made, but a relevant consideration for Scottish Ministers in reaching a decision. For S36 applications, the primary legislation is the Electricity Act of 1989, not the local development plan.

Case-by-case analysis vs blanket planning guidance

Attempts to define terms beyond NPF4 in this guidance are not compatible with NPF4. This guidance attempts, in many places, to define terms to create blanket policies that should be determined on a case-by-case basis, for example in environmental impact assessments (EIAs). This includes references to 'localised impact' or 'localised', and concepts, such as

visual and landscape impacts or cumulative impact, which are reviewed on a case-by-case basis for applications. This is also true for attempts to require mitigations that have not yet been identified as necessary, for example for battery storage projects or in defining 'appropriate design mitigation' as *all* reasonable mitigation has been applied. Every application will evaluate these factors on a case-by-case basis and provide project-specific analysis of what can and cannot be mitigated and how, with no regard to this guidance. NPF4 is clear in Policy 11 that appropriate mitigation should be applied. This is different from requiring 'all reasonable mitigation', which oversteps the intention of NPF4. Trying to create generalised guidance for concepts that are best left to case-by-case analysis is not useful planning guidance.

For example, the Highland Boundary Fault, iconic views, and the A9 corridor are all referenced throughout this guidance as if they are designations that limit renewable energy developments, when in fact they are not blanket limitations for renewable energy developments. The only designations that prohibit onshore wind farms are National Parks and National Scenic Areas. Everything else is a landscape characteristic, not a designation, and applications in those areas should be reviewed on a case-by-case basis to assess their suitability for the proposed location.

This guidance also neglects to reference NPF4 Policy 11e in considering an application's effects: 'In considering these impacts, significant weight will be placed on the contribution of the proposal to renewable energy generation targets and on greenhouse gas emissions reduction targets'. This language from NPF4 should be included in this guidance to ensure that it is central to decision-making on renewable energy applications.

This guidance also requires a socio-economic benefit chapter in EIA reports. Scottish Renewables has worked with the Scottish Government on streamlining EIA reports, per the Scottish Onshore Wind Sector Deal. The [guidance that has been published](#) from this collaborative work recommends removing this chapter from EIA reports. Instead, a [Maximising Net Socio-Economic Benefit report](#) is recommended, with Scottish Renewables providing a framework for developers to use that is consistent with the Community Wealth Building goals of local planning authorities. There is no guidance on NPF4 Policy 11c coming from the Scottish Government.

There is also a reference to monetary benefits not justifying 'environmentally damaging proposals'. This statement insinuates that community benefits or shared ownership offers exist to offset environmental damage, which is untrue and misleading. We recommend rewording this section to state that monetary benefits, such as community benefits or shared ownership, are not material to planning and cannot be taken into account in decisions on planning applications.

Grid

This guidance requires developers to provide the grid connection location and route with their

application submission. The network operator progresses grid connection routes under separate applications, and they are not under the control of the applicant. This is an onerous requirement that goes beyond NPF4's requirements. Policy 11 clearly states that grid connection should not be a constraint on renewable energy applications. This requirement should be removed from this guidance in all the places where it is referenced.

Co-location

This section suggests that proposals that do not co-locate battery storage with energy generation may not receive as much weight as other planning applications. This position is not in line with NPF4 or the practicalities of renewable energy development, since the existence or lack of battery storage should not prejudice a planning application. Many other factors will determine the suitability of battery storage at a location, including grid connection, the need for battery storage in a given location, or the financial viability of battery storage for a given project. Planning policy is not one of those considerations.

Prime Agricultural Land

NPF4 Policy 5 clearly states that development on prime agricultural land 'will only be supported where it is for: iv. The generation of energy from renewable sources...'. Therefore, any reference in this guidance to prime agricultural land as a barrier for renewable energy development, or the creation of more stringent policy around renewable energy development on prime agricultural land, is out of step with NPF4 and should be removed. Any mitigation for development on prime agricultural land will be determined on a case-by-case basis.

Decommissioning and Restoration

This guidance recommends that a draft decommissioning and restoration plan (DRP) should be submitted with the application. However, that is an onerous demand on developers. Proposals typically do not include that level of detail for the DRP at the application stage. These details can appropriately be secured through a planning condition.

Repowering and Life Extensions

This guidance conflates the replacement of wind turbines with repowering in a manner not supported by NPF4. There are many reasons why a turbine might be replaced that do not fall under repowering, making this list of requirements unnecessary. Repowering a project will require the project to go through planning permission, and all of the information required in a planning application will be provided. Also, a repowering project planning application would not be submitted in phases. That would lead to salami slicing. An EIA would cover the necessary analysis of impact and mitigation needs. There is no need to lay out additional requirements here.

While the guidance states that wind turbine sites are expected to be suitable for use in perpetuity, the list of requirements created here implies additional barriers to repowering wind farms that NPF4 does not support.

Wild Lands

NPF4 confirms that proposals that support meeting renewable energy targets in areas identified as wild land must be accompanied by a wild land impact assessment, taking account of design, siting and mitigation for the minimisation of significant impacts on the qualities of the wild land. For proposals out with wild land, there will be no buffer zone applied, and the effects of development will not be a significant consideration.

This guidance lacks clarity in its distinction between renewable energy proposals in wild land areas (WLAs) and those outside. References in the guidance to consideration of the effects on the landscape of, and views from and to, WLAs should be removed as they do not align with NPF4. If P&K wishes to retain reference to WLAs, an appropriate qualifier must be included that this only applies to projects located within a WLA.

Additionally, this guidance notes that Policy 4(g) is subject to the qualification in Policy 4(a) of NPF4, i.e. 'Development proposals which by virtue of type, location or scale will have an unacceptable impact on the natural environment, will not be supported'.

This misrepresents the application of NPF4, which requires the decision-maker to balance all relevant and material considerations applicable to a proposal and weigh compliance with such policies in the overall planning balance. The above statement (as shown on page 15 of the draft guidance) should be removed.

We would welcome the opportunity to work with P&KC to update this guidance to better reflect NPF4 and the flexibility it was designed to provide planning decision-makers in making decisions on individual planning applications. Please get in touch with me if you require any further information.

Sincerely,

A handwritten signature in black ink, appearing to read 'Megan Amundson', with a stylized flourish at the end.

Megan Amundson
Head of Onshore & Consenting
Scottish Renewables