National Planning Framework 4 Early Engagement – Policies

**DELIVERING ELECTRICITY**

*Scottish Planning Policy (2014):*

*154. Requires planning to support the transformational change to a low carbon economy, consistent with targets including 30% of demand from renewable sources by 2020, 11% of heat demand from renewable sources by 2020 and the equivalent of 100% of electricity demand from renewable sources by 2020. Planning should also support the development of heat networks, guide development to appropriate locations and advise on the issues to be taken into account when proposals are assessed. Planning should help to reduce emissions and energy use in new buildings and from new infrastructure by enabling development that contributes to energy efficiency, heat recovery, efficient energy supply and storage, heat from renewable sources, and from non-renewable sources where emissions can be significantly reduced.*

*155. Development plans should seek to ensure an area's full potential for electricity and heat from renewable sources is achieved, in line with national climate change targets, giving due regard to relevant environmental, community and cumulative impact considerations.*

*156. Strategic development plans should support national priorities for the construction or improvement of strategic energy infrastructure, including generation, storage, transmission and distribution networks. They should address cross-boundary issues, promoting an approach to electricity and heat that supports the transition to a low carbon economy.*

*157. Local development plans should support new build developments, infrastructure or retrofit projects which deliver energy efficiency and the recovery of energy that would otherwise be wasted both in the specific development and surrounding area. They should set out the factors to be taken into account in considering proposals for energy developments. These will depend on the scale of the proposal and its relationship to the surrounding area and are likely to include the considerations set out at paragraph 169.*

*Onshore Wind*

*161. Planning authorities should set out in the development plan a spatial framework identifying those areas that are likely to be most appropriate for onshore wind farms as a guide for developers and communities, following the approach set out below in Table 1 (as set out in the SPP). Development plans should indicate the minimum scale of onshore wind development that their spatial framework is intended to apply to. Development plans should also set out the criteria that will be considered in deciding all applications for wind farms of different scales – including extensions and re-powering – taking account of the considerations set out at paragraph 169.*

*162. Both strategic and local development planning authorities, working together where required, should identify where there is strategic capacity for wind farms, and areas with the greatest potential for wind development, considering cross-boundary constraints and opportunities. Strategic development planning authorities are expected to take the lead in dealing with crossboundary constraints and opportunities and will coordinate activity with constituent planning authorities.*

*163. The approach to spatial framework preparation set out in the SPP should be followed in order to deliver consistency nationally and additional constraints should not be applied at this stage. The spatial framework is complemented by a more detailed and exacting development management process where the merits of an individual proposal will be carefully considered against the full range of environmental, community, and cumulative impacts (see paragraph 169). Individual properties and those settlements not identified within the development plan will be protected by the safeguards set out in the local development plan policy criteria for determining wind farms and the development management considerations accounted for when determining individual applications.*

*165. Grid capacity should not be used as a reason to constrain the areas identified for wind farm development or decisions on individual applications for wind farms. It is for wind farm developers to discuss connections to the grid with the relevant transmission network operator. Consideration should be given to underground grid connections where possible.*

*166. Proposals for onshore wind turbine developments should continue to be determined while spatial frameworks and local policies are being prepared and updated. Moratoria on onshore wind development are not appropriate.*

*Other Renewable Electricity Generating Technologies and Storage*

*167. Development plans should identify areas capable of accommodating renewable electricity projects in addition to wind generation, including hydro-electricity generation related to river or tidal flows or energy storage projects of a range of scales.*

*168. Development plans should identify areas which are weakly connected or unconnected to the national electricity network and facilitate development of decentralised and mobile energy storage installations. Energy storage schemes help to support development of renewable energy and maintain stability of the electricity network in areas where reinforcement is needed to manage congestion. Strategic development planning authorities are expected to take the lead in dealing with cross-boundary constraints and opportunities and will coordinate activity between constituent planning authorities.*

*Development Management*

*169. Proposals for energy infrastructure developments should always take account of spatial frameworks for wind farms and heat maps where these are relevant. Considerations will vary relative to the scale of the proposal and area characteristics but are likely to include:*

- *net economic impact, including local and community socio-economic benefits such as employment, associated business and supply chain opportunities;*
- *the scale of contribution to renewable energy generation targets;*
- *effect on greenhouse gas emissions;*
- *cumulative impacts – planning authorities should be clear about likely cumulative impacts arising from all of the considerations below, recognising that in some areas the cumulative impact of existing and consented energy development may limit the capacity for further development;*
- *impacts on communities and individual dwellings, including visual impact, residential amenity, noise and shadow flicker;*
- *landscape and visual impacts, including effects on wild land;*
- *effects on the natural heritage, including birds;*

- *impacts on carbon rich soils, using the carbon calculator;*
- *public access, including impact on long distance walking and cycling routes and scenic routes identified in the NPF;*
- *impacts on the historic environment, including scheduled monuments, listed buildings and their settings;*
- *impacts on tourism and recreation;*
- *impacts on aviation and defence interests and seismological recording;*
- *impacts on telecommunications and broadcasting installations, particularly ensuring that transmission links are not compromised;*
- *impacts on road traffic;*
- *impacts on adjacent trunk roads;*
- *effects on hydrology, the water environment and flood risk;*
- *the need for conditions relating to the decommissioning of developments, including ancillary infrastructure, and site restoration;*
- *opportunities for energy storage; and*
- *the need for a robust planning obligation to ensure that operators achieve site restoration.*

*170. Areas identified for wind farms should be suitable for use in perpetuity. Consents may be time-limited but wind farms should nevertheless be sited and designed to ensure impacts are minimised and to protect an acceptable level of amenity for adjacent communities.*

*171. Proposals for energy generation from non-renewable sources may be acceptable where carbon capture and storage or other emissions reduction infrastructure is either already in place or committed within the development's lifetime and proposals must ensure protection of good environmental standards.*

*172. Where new energy generation or storage proposals are being considered, the potential to connect those projects to off-grid areas should be considered.*

*Community Benefit*

*173. Where a proposal is acceptable in land use terms, and consent is being granted, local authorities may wish to engage in negotiations to secure community benefit in line with the Scottish Government Good Practice Principles for Community Benefits from Onshore Renewable Energy Developments.*

*Existing Wind Farm Sites*

*174. Proposals to repower existing wind farms which are already in suitable sites where environmental and other impacts have been shown to be capable of mitigation can help to maintain or enhance installed capacity, underpinning renewable energy generation targets. The current use of the site as a wind farm will be a material consideration in any such proposals.*

**What has changed since 2014?**

- The Climate Change (Emissions Reduction Targets) (Scotland) Act 2019[1] commits Scotland to becoming a net-zero society by 2045 in line with the advice of the UK Committee on Climate Change. This includes a new target to reduce greenhouse gas emissions by 75% by 2030. A Citizens' Assembly on Climate Change will explore recommendations on how this can be achieved.

- The Scottish Government has committed to updating the Climate Change Plan within 6 months of the Climate Change Bill receiving Royal Assent (30 October 2019).

- In 2019 the Scottish Government set out a vision to 2030 for Scotland's electricity and gas networks[2], supporting an inclusive transition to a decarbonised energy system; a whole system approach across heat, transport and electricity; and smarter local energy models. New transmission infrastructure will be required, including links to meet the needs of the islands, within Scotland and with the rest of the UK. Improved distribution, including through innovation, demand management, builds resilience and ensures supplies will be required.

- In 2017 the Scottish Energy Strategy was published, based on three principles of: a whole system view; an inclusive energy transition; and a smarter local energy model. Priorities include energy efficiency, system security, innovative local energy systems, and renewable and low carbon solutions. A more co-ordinated approach to planning and meeting distinct local energy needs is supported, to create a flexible approach to transformation of the energy system. It sets out a commitment to a land use planning approach which continues to support development while protecting our landscapes. Reference is also made to expanding permitted development rights for certain renewable energy installations. The Strategy refers to the review of NPF and the opportunities to collaborate on a revised set of national policy in line with the goals of the energy strategy and climate change plan.

- The Planning (Scotland) Act allows Scottish Ministers to direct planning authorities to provide information on systems for the supply of energy in particular land available for the development and use of facilities for renewable sources of energy. The same information is also set out as an issue for local development plans to address for their areas. During the debate on the Planning Bill, a stage 2 amendment that proposed giving statutory status to wild land was not supported by the Scottish Parliament.

- SNH consulted on guidance[3] for repowering wind farms. Following consultation, they recommend that the baseline for the assessment should be the 'current state of the environment' as set out in the EIA regulations.

- Research undertaken by Ironside Farrar on the adoption of Scottish planning policy in local development plans[4] found that whilst the policy works well for supporting renewable energy infrastructure and provides a clear spatial hierarchy, basing decisions on landscape capacity studies would be a more robust approach. The research showed views that LCS should not be a substitute for site specific landscape and visual impact assessment. Conflicts between wild land policy in this section of the SPP and the wider policy would benefit from clarification and some terms (e.g. 'significantly' and 'substantially') require further consideration. The

[1] Climate Change (Emissions Reduction Targets) (Scotland) Act 2019
[2] Scotland's electricity and gas networks: vision to 2030
[3] Assessing the impact of repowered wind farms on nature
[4] Adoption of Scottish planning policy in local development plans

research also showed support for a stronger presumption in favour of development, accepting significant landscape change in wild land areas. There was broad support for strengthening the policy support for renewable energy overall, to facilitate the development of new and repowered wind farm sites, incorporating the latest, most efficient technologies. Supportive policies for new solar and battery storage projects could also help with climate change goals.

**Proposed key objectives of NPF4:** To maximise the contribution of renewable electricity generation to meeting our net zero target in a sustainable way.

**Issues to consider:**

- Is the existing policy approach fit for purpose? What aspects need to change?
- How can national planning policies support future repowering of wind farms?
- What other technologies need to be addressed by the policy?
- How can NPF4 support strategic energy infrastructure (including generation, storage, transmission and distribution networks)?
- How can NPF4 help deliver the aims of the Energy Strategy?
- How do we balance renewable energy ambitions with the need to protect our natural environmental assets? (e.g. Wild land/Landscape)?
- How can national planning polices support planning for interdependencies between energy networks (e.g. electricity and heat)?
- How can national planning polices support delivering energy efficiency and the recovery of energy that would be otherwise wasted.

## Get Involved

For more information and other resources

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