

**Directors:**  
Mary Quaney,  
Cameron Smith,  
Adam Bruce.

**UK Mainstream Renewable Power Ltd**  
1 Lochrin Square  
92 Fountainbridge  
Edinburgh EH3 9QA  
Scotland

t: +44 131 357 4000  
e: info@mainstreamrp.com  
www.mainstreamrp.com

**UK Mainstream Renewable Power Ltd**  
is registered in the UK.  
**Registered Number:** 6538309  
**Registered Office:**  
10 St. Paul's Churchyard,  
London,  
EC4M



National Planning Framework 4 Team  
Planning & Architecture Division  
The Scottish Government  
The Scottish Government  
Victoria Quay  
Edinburgh  
EH6 6QQ

30 April 2020

Dear Sir/Madam,

## **RESPONSE ON BEHALF OF MAINSTREAM RENEWABLE POWER TO NATIONAL PLANNING FRAMEWORK 4 CALL FOR IDEAS CONSULTATION**

Please find below a response on behalf of Mainstream Renewable Power (MRP) as part of the Scottish Government's National Planning Framework (NPF) 4 "Call for Ideas" consultation process.

### **About MRP**

MRP has a track record of developing major renewable energy developments across the world, including a major offshore wind project in Scotland. MRP welcomes the opportunity to engage early in the preparation of NPF4 and the representations below seek to ensure that the Scottish planning system continues to facilitate investment in essential infrastructure.

### **National significance of offshore wind and associated onshore transmission infrastructure**

MRP recognises the crucial role of the planning system in facilitating the investment required for Scotland to deliver its low carbon transition over the coming decades.

Offshore wind will perform a significant role of as part of the renewable energy mix, with the majority of offshore wind developments including a terrestrial electricity transmission grid infrastructure component. That infrastructure is typically afforded national development status by virtue of NPF3's national development 4. That designation is the Scottish Government's recognition of the national significance of such infrastructure, establishing the principle of such developments and identifying the priority nature of associated applications.

This response focuses upon continued national development status for electricity transmission infrastructure, and the practical implications of such status.

### **Continued national development status**

MRP requests continued national development status for electricity transmission infrastructure, consistent in scope with that currently identified within NPF3 as national development 4. Continued status for

electricity transmission infrastructure is an essential part of how the planning system contributes towards the efficient delivery of nationally significant infrastructure.

#### **Practical implications of national development status**

In parallel with the continued national development status for electricity transmission infrastructure, a number of further refinements would help ensure that the practical implications of national development status result in a proportionate and effective planning process.

#### *Local Planning Authority resourcing of national developments*

National development status recognises that national significance of a development. As development contributing to the Scottish Government's wider policy objectives, national developments should be resourced in accordance with this priority status. MRP recognises the ongoing resource challenges faced by Scotland's planning authorities and accepts that by their very nature, national developments are often complex and resource intensive.

In contributing towards the delivery of appropriate nationally significant infrastructure, planning authorities are often challenged from a resourcing perspective, and MRP encourages the Scottish Government to consider options whereby planning authorities can charge for non-essential services such as pre-application engagement. If undertaken effectively, such engagement can contribute significantly towards the efficient delivery of nationally significant infrastructure.

#### *Efficient discharge of planning conditions*

MRP also encourages the Scottish Government to consider the introduction of mechanisms to prioritise the discharge of planning conditions attached to planning permissions (or other consents) for national developments. The introduction of a target timescale for local planning authority to respond to submissions pursuant to conditions could significantly assist developers' programming of construction activities.

The introduction of a small fee, payable by developers to local planning authorities alongside submissions in respect of planning conditions, would assist local planning authorities with the cost of the resources required for this phase of the planning process.

DPEA involvement, in the event of a planning authority's failure to respond to a submission relating to a planning condition, should be considered in parallel.

#### *Status of ancillary infrastructure*

Previous iterations of NPF have adopted different approaches with regards to the status of development associated with national developments. Whilst sometimes separately consented, ancillary infrastructure can be essential to the construction or operation of nationally significant infrastructure.

MRP recognises the difficulty in identifying a "one size fits all" process which can be applied across national developments with different characteristics. A balance is required, ensuring sufficient status is afforded to ancillary infrastructure also whilst ensuring sometimes otherwise minor development is not subject to disproportionate and/or overly onerous process.

MRP encourages the Scottish Government to consult upon potential options for ancillary infrastructure as part of the NPF4 process. For example, applications for national development could include a short statement on "ancillary infrastructure" which is being consented separately. Where such ancillary infrastructure is, for example, "local" development in its own right, it should be processed as such, but with acknowledgement from the planning authority that the infrastructure is essential to the delivery of a national development, as recognised within the statement in the national development application. Alternative options could be considered, but should avoid ancillary infrastructure being burdened with a

national development status in its own right, which could result in disproportionate planning processes being required.

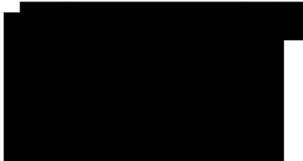
*Implications of national development status for development planning*

National development designations without a link to a specific site or a specific spatial component, can often be omitted from planning authorities' early stage development plans. NPF4 should include a specific statement in respect of each national development, required to be transposed verbatim into Local Development Plans, ensuring national development are not omitted from development plans. Such statements should include:

- A description of the national development;
- A spatial statement, whether the national development relates to a specific site, to the local authority area as a whole, or other;
- Reference to the policy areas which should reference the national development designation and any relevant caveats. For example, electricity transmission infrastructure could be an acceptable form of development within green belt areas, if required for operational reasons, subject to acceptable environmental impacts.

We would be happy to discuss these representations in further detail. Please do not hesitate to contact me if that would assist, or if you require any further information at this stage.

Yours faithfully



GRANT YOUNG BA (Hons) MSc URP MRTPI  
DIRECTOR, YOUNG PLANNING & ENERGY CONSENTING  
For and on behalf of MAINSTREAM RENEWABLE POWER

cc Ewan Walker Mainstream Renewable Power

Enc