



Scottish Government

Onshore Development

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Dear Sirs,

Scottish Government National Planning Framework 4: Call for Ideas

innogy Renewables UK Ltd (innogy) welcomes the opportunity to respond to the Call for Ideas on the Scottish Government's 4th National Planning Framework (NPF4) which will have a significant bearing on our development activities in Scotland. The Scottish Parliament has asked that specific attention is given to six particular high-level outcomes in National Planning Framework 4 (NPF4), including carbon reduction particularly "Meeting any targets relating to the reduction of emissions of greenhouse gases". innogy supports the inclusion of a high-level outcome on carbon reduction and is of the view that renewable energy developments can make a significant contribution to promoting and delivering a competitive, sustainable and decarbonised society.

The Scottish Government's continued positive approach towards renewable energy developments is key to tackling the causes of climate change. Successive planning policies at the national level have enabled significant progress on the deployment of onshore and offshore renewable energy projects across Scotland. NPF4 must continue to offer this positive decision-making framework and is also an opportunity to address some of the issues that are hampering developments such as wild land, aviation, and the approach taken by statutory consultees and planning authorities.

innogy in Scotland

innogy Renewables UK Ltd is part of innogy SE, a leading European energy company with a current generation capacity globally of over 3.9GW, that includes over 1.9GW of onshore wind and over 1GW of offshore wind, with plans to expand its renewables portfolio worldwide.

In Scotland, innogy employs over 30 permanent employees across its two offices located in Perth and Inverness. innogy's portfolio in Scotland includes an installed capacity of around 130MW including six

onshore wind farms and 16 hydro-electric sites. In addition to our operational portfolio, we also have one onshore wind site under construction along with a healthy pipeline of development projects. Since 2007, we have distributed nearly £4million in community benefit funding from our Scottish projects to local causes.

Please see below innogy's response to the NPF4 Call for Ideas.

Yours faithfully,



Eleri Davies
Head of Consents UK
Innogy Renewables UK Limited

1. NPF4 Call for Ideas

1.1 NPF4 is an opportunity to create a an ambitious, positive and enabling policy context for renewables which will allow industry to increase investment in renewable energy developments. By creating certainty in the planning system, developers will be able to develop sites which are de-risked from a planning perspective, thus speeding up the significant deployment required to achieve Scotland's 'net-zero' target.

1.2 Below are matters that need to be acknowledged, considered and/or incorporated into NPF4:

1.3 The Climate Emergency and Net Zero

1.3.1 The Scottish Government has declared a Climate Emergency and set an ambitious target to become net zero by 2045. In this context, the Scottish Government needs to establish realistic and evidence-based demand assumptions periodically through to 2045 – without these, it is difficult to plan for the future and impossible to measure progress against the net zero target.

1.3.2 The UK Committee on Climate Change (UKCCC) estimates that delivering net zero will require a **fourfold increase in renewable energy deployment**¹. In this context, there needs to be a recognition that 'business as usual' is not enough - accelerated action and rapid progress is required. A renewed, positive planning approach which does not unnecessarily constrain opportunities is crucial if the Scottish Government is serious about unlocking the opportunities inherent in Scotland's resource potential. NPF4 is an opportunity to put in place a new planning framework that can facilitate the delivery of the Scottish Government's targets and address the Climate Emergency. In a rapidly changing context, NPF4 also needs to be flexible and responsive enough to adapt to future decisions.

1.3.3 The planning system in Scotland plays a key role in facilitating clean growth and decarbonisation, and the role of NPF4 should be to provide the decision-making framework to facilitate nationally significant renewable energy development and its associated infrastructure. The recent Ardtaraig appeal decision² highlighted a reluctance to give significant weight to the climate emergency until policy is updated. The Scottish Government needs to provide a clear steer to decision-makers in NPF4 on the significant weight to be attached to applications that respond to the Climate Emergency and contribute towards the net zero target.

¹ <https://www.theccc.org.uk/wp-content/uploads/2019/05/Net-Zero-The-UKs-contribution-to-stopping-global-warming.pdf>

² Ref: PPA-130-2073

- 1.3.4 NPF4 will not be adopted until 2021 however the climate emergency demands that we take action now. The Scottish Ministers and/or Scottish Government should consider issuing a Ministerial Statement or Chief Planner's Letter as an interim measure to confirm that the climate emergency and the 2045 net zero target should be material considerations and afforded significant weight in planning decisions.

1.4 The Energy Trilemma: Security of Supply, Cost to Consumers and Decarbonisation

- 1.4.1 There is increasing recognition (including by the UKCCC) that offshore wind and onshore wind can generate the cheapest electricity and reduce the cost to consumers. NPF4 must put in place the positive and ambitious planning framework that will facilitate the continued expansion of these technologies in Scotland. As well as providing policy support to renewable energy generating stations, NPF4 must also put in place a supportive framework to deliver the significant new and upgraded grid infrastructure required to enable the growth in renewables.
- 1.4.2 It is also critical that Scotland continues to have secure and reliable supplies of electricity throughout the transition to a low carbon economy, whilst also replacing existing power plants due for closure. To manage the risks to achieving security of supply, sufficient electricity capacity (including a greater proportion of low carbon generation) is required to meet demand, and this requires a diverse mix of technologies and fuels.
- 1.4.3 However, encouraging renewable and low carbon energy is only a small part of the wider decarbonisation agenda. Strategic decisions, for example on the decarbonisation of heat (i.e. electrification vs repurposing the gas network using renewable gases and hydrogen), have yet to be made and will inevitably have an impact on spatial planning in the future.
- 1.4.4 NPF4 should recognise the **need and urgency for new energy infrastructure to be consented and built with the objective of contributing to a secure, diverse and affordable energy supply** and supporting the Government's policies on sustainable development, in particular by mitigating and adapting to climate change. For all renewable energy projects, the starting point must be a **'presumption in favour of granting consent'**. Policy support is instrumental to reducing the consenting stage risk associated with developing new renewable energy infrastructure.
- 1.4.5 The facilitation of investment in grid solutions is necessary to realise the potential for onshore wind deployment, and **'in principle' support for new and reinforced grid infrastructure** should be explicitly stated in NPF4.

- 1.4.6 NPF4 should **set out a strategic direction for electric vehicle (EV) charging infrastructure, including 'in principle' support for the new and/or upgraded grid infrastructure** required in parts of Scotland to enable the roll out of EV charging points. A further important consideration is data connectivity infrastructure, which is already insufficient in some areas to deal with EV charging infrastructure in parts of Scotland.
- 1.4.7 NPF4 should **consider the grid infrastructure required to decarbonise transport in conjunction with the infrastructure required to facilitate further deployment of renewable energy** – the two cannot be considered separately as what benefits one may well benefit the other.
- 1.4.8 Although assessed under marine policy, **NPF4 should recognise the contribution of offshore renewable energy projects and provide 'in principle' support for the onshore installations associated with offshore projects** (including substations, cable routes and port infrastructure) which will often require separate consents.

1.5 Technological Advancements

- 1.5.1 The OWPS acknowledges “that onshore wind technology and equipment manufacturers in the market are moving towards larger and more powerful (i.e. higher capacity) turbines, and that these – by necessity – will mean taller towers, and blade tip heights.” NPF4 should make **explicit reference to the acceptability of taller turbines with larger rotor diameters and ensure that policy is sufficiently flexible to accommodate the speed of technological change in the market.**

1.6 Economic Benefits, Community Benefits and Shared Ownership

- 1.6.1 A 2019 report by Vivid Economics³ highlighted that deploying 35 GW of onshore wind by 2035 could support around 2,300 direct jobs in Scotland, with areas of relatively high unemployment in Scotland most likely to benefit from these future onshore wind-supported jobs. In terms of broader benefits, the report puts the gross value added (GVA) uplift in Scotland brought by onshore wind at £50m per year by 2035, representing a significant boost to regional productivity and helping the region narrow the gap with the national average.
- 1.6.2 NPF4 should reflect the Good Practice Principles⁴ and recognise that community benefits and shared ownership are voluntary, and should take the form of a flexible package of benefits to be considered on a case by case basis and related to the specific needs of local communities.

³ https://www.vivideconomics.com/wp-content/uploads/2019/08/Quantifying_the_Benefits_of-report-.pdf

⁴ <https://www.gov.scot/publications/scottish-government-good-practice-principles-shared-ownership-onshore-renewable-energy-developments/> and <https://www.gov.scot/publications/scottish-government-good-practice-principles-community-benefits-onshore-renewable-energy-developments/>

In line with guidance and case law, community benefits and shared ownership should not be material planning considerations.

- 1.6.3 It is pertinent to note that, from experience to date, there has been limited interest from local communities in shared ownership offerings associated with onshore wind projects at the development stage. The Scottish Government may want to gather evidence on this point and review their approach to shared ownership in due course.

1.7 Other Associated Benefits

- 1.7.1 Scottish Government policy should, wherever possible, recognise the opportunities to take a more holistic approach where proposals can deliver multiple benefits above and beyond the provision of renewable energy. As well as the economic benefits of renewable energy projects referenced in the 2019 report by Vivid Economics⁵, there are opportunities to integrate broadband with new grid connections to improve connectivity in remote areas (as demonstrated by the work of Borderlink in South Scotland), and recognising the link between renewable energy projects and the roll out of electric vehicles and/or hydrogen vehicles.
- 1.7.2 As well as contributing to the net zero target, renewable energy projects can also provide environmental benefits (funded by the developer), such as contributing to resilient ecological networks, restoring degraded peatlands and restoring semi-natural grasslands on post-agricultural land. There are numerous recent examples in Scotland of peatland restoration carried out as an integral part of onshore wind farm developments.
- 1.7.3 At Bad a Cheo Wind Farm, innogy restored ~39ha of degraded peatland by using peat turves from the wind farm construction, together with drain blocking. At innogy's under construction Glen Kyllachy Wind Farm, ~53ha of moderately degraded peat will be restored as part of the project. It is highly unlikely that these degraded areas of peat would have benefitted from restoration in the absence of the wind farm being developed. These examples demonstrate that the two uses are perfectly compatible – there is no need to safeguard land for peatland restoration purposes in circumstances where a suitable development could deliver significant environmental benefits in tandem.

1.8 Presumption in Favour of Renewable Development (including Repowering)

- 1.8.1 The Scottish Government has made a commitment to ensuring that planning responds to the global climate emergency and NPF4 should explicitly recognise this and the significant contribution that onshore wind and other renewables can make towards achieving Scotland's

⁵ https://www.vivideconomics.com/wp-content/uploads/2019/08/Quantifying_the_Benefits_of-report-.pdf

2045 net zero target. The principles set out in the Scottish Energy Strategy (SES) and the Onshore Wind Policy Statement (OWPS) should be revised and updated, in light of the declaration of a climate emergency and Scotland's 2045 net zero target, and embedded as central components of NPF4.

1.8.2 NPF4 must provide strong 'in principle' support for renewable energy developments and associated grid infrastructure, including:

- a. **tipping the balance in favour of renewable energy developments and associated grid infrastructure;**
- b. giving a clear direction to decision-makers to **afford significant weight to the climate emergency and Scotland's net zero target when determining renewable energy applications that deliver sustainable development that contribute to meeting decarbonisation targets;**
- c. **affording significant weight to the proposal's contribution towards satisfying a need for renewable energy infrastructure,** on the basis that the Scottish Government has demonstrated that there is a need; and
- d. **applying a presumption in favour of renewable energy developments and an associated acceptance of landscape change in areas outside of National Parks and National Scenic Areas.**

1.8.3 The **presumption in favour of repowering proposals and the explicit recognition that the current use of the site as a wind farm will be a material consideration in any such proposals should be carried across to NPF4 and strengthened.** There needs to be a recognition that, in Scotland, 5GW⁶ of existing capacity (mostly time limited in planning) is likely to be decommissioned by 2040 and, on top of the additional capacity required, this existing capacity will need to be replaced in order to remain on track to meet ambitious targets.

1.9 Current Issues and Barriers

1.9.1 NPF4 should also address the various issues and barriers facing the sector (as set out below) to facilitate the deployment of renewables at the scale required to achieve Scotland's net zero target.

1.10 Landscape and Visual Impacts

1.10.1 Landscape and visual impacts are often the main reason for refusal / objection of onshore wind planning applications – in fact, it is evident that landscape and visual impacts are

⁶ Figures from RenewableUK's repowering report Onshore wind: The UK's Next Generation, April 2019

afforded an elevated status in the decision-making process above all other considerations. In the context of the climate emergency and Scotland's net zero target, **NPF4 should relax the importance afforded to landscape impacts and afford more weight to a development's positive contributions** towards Scotland's net zero target, the climate emergency, sustainable development, net economic benefits etc.

- 1.10.2 New onshore wind energy development will be different in scale from older wind farms as they will incorporate more modern turbine designs, and this is sometimes deemed a reason for refusal (including at innogy's Ardchnonnell site). Given the climate emergency and the net-zero target, **limited weight should be afforded to scale disparities between existing and proposed turbines.**
- 1.10.3 Visible aviation lighting presents a challenge to the industry but this should not automatically lead to refusals or unworkable conditions. In a climate emergency, **the policy test for refusing a project on grounds of visible aviation lighting (above 150m tip height) should be set extremely high.** The Scottish Government needs to quickly confirm its position on aviation lighting to avoid numerous schemes being objected to and/or refused unnecessarily.
- 1.10.4 The Scottish Government should also confirm the status of local landscape designations (e.g. Special Landscape Areas) – although not an area identified as Group 2, SLAs are used by many LPAs as a tool to block / constrain onshore wind proposals. NPF4 needs to make it clear that SLAs cannot be used as reasons to object to or refuse applications.

1.11 Landscape Capacity Studies

- 1.11.1 Landscape Capacity Studies (LCSs) attached to Supplementary Guidance, and therefore forming part of the Local Development Plans (LDPs), are often out of date and not aligned with Scottish Government energy policy and the rapidly evolving technology market (e.g. the trend towards taller tip heights). Several LCSs state that specific turbine typologies are unacceptable in certain locations, and are often used by decision makers at the local level and interpreted quite literally as the primary tool for objecting to, and/or refusing, planning and s36 applications. The LCS is one of a number of documents that can assist decision makers in coming to an overall balanced planning conclusion on individual planning applications, but the LCS should not be determinative in its own right.
- 1.11.2 It is well established that LCSs have limitations when it comes to assessing individual planning applications, a point noted in several wind energy planning appeals and s36 decisions. Despite this, SNH and planning authorities continue to afford significant weight to LCSs to support their cases. There is consensus that such studies are in no way determinative and are no substitute for a detailed case by case assessment where the individual merits of an

application are to be considered (SPP 163). Relevant cases where the status of LCSs has been clarified include:

- **Sorbie Wind Farm⁷**: the Reporter considered that a proposals specific landscape and visual impact assessment is a better basis for reaching a conclusion on the cumulative impacts compared to the generalised assessment contained in a LCS. Whilst LCSs could be useful tools in understanding the nature of the impacts which can be caused by wind farms, it is not appropriate for them to give attributes of detailed zonings for particular numbers and sizes of turbines.
- **Kirk Hill Wind Farm⁸**: the Reporter allowed the appeal despite the fact that the LCS did not consider there to be capacity for the proposed development.
- **Fauch Hill Wind Farm⁹**: the Reporter noted in paragraph 70 that “I do not regard conflict with the capacity study as adding any weight to a decision to resist the proposal, as such studies can only ever provide an indication of areas that are likely to have more or less capacity for this form of development and must be supplemented by a proposal and site specific assessment”.
- **Eascairt Wind Farm¹⁰**: the Reporter noted in paragraph 8 that the LCS provides a “strategic assessment” only and that the proposal needed to “be subject to an assessment of the actual impacts on the ground”. The LCS did not count against the proposal, despite this featuring in several of the Council’s reasons for refusal.
- **Larbrax Wind Farm¹¹**: the Reporter noted in paragraph 26 of that appeal decision that while that document was a “useful indicator of the relative ease within which a particular landscape might accommodate a particular type of wind farm...it is no substitute for a site and proposal-specific assessment of landscape and visual effects”. The Reporter goes on to note that while that LCS effectively ruled out the possibility of developing a wind farm anywhere within the Rhins peninsula (and that was a material consideration) it in no way obliged him to dismiss the appeal; planning permission was subsequently granted.
- **Killean Wind Farm¹²**: the Reporter noted at paragraph 2.59 that “a capacity study can be helpful in considering the nature of the landscape for a spatial area as a whole. However, such a study is no substitute for a site specific assessment and it is important that any

⁷ Ref: AIR-NAY-001

⁸ Ref: PPA-370-2052

⁹ Ref: PPA-400-2084

¹⁰ Ref PPA-130-2059

¹¹ Ref PPA-170-2105

¹² Ref: W^{IN}-130-3

study is not given the attributes of a detailed zoning plan or that it replaces the spatial guidance set out in Scottish Planning Policy and in the development plan". In paragraph 3.156, it was noted that the study is a "guide to the relative sensitivity of landscapes to wind turbines and Ministers are not bound by its approach".

- **Limekiln Wind Farm¹³**: there is very little in the way of commentary on the role of LCS in the main report but in paragraph 9.40 the Reporters noted "we find the capacity study to be a helpful strategic guide, but we do not consider its findings to be capable of being pivotal to our assessment".
- **Enoch Hill Wind Farm¹⁴**: the Reporter concluded in paragraph 3.197 "The EALWCS 2013 and 2018 are helpful in providing a strategic landscape strategy, landscape sensitivity and highlighting constraints/opportunities for proposed wind energy proposals. However, I agree with the applicant that the findings of a detailed site-specific landscape study (as conducted through the ES/FEI and associated environmental information) could provide sufficient justification to allow a departure from the non-statutory guidance contained in the wind capacity studies".
- **Drum Holistan Wind Farm¹⁵**: a very similar approach to Limekiln and indeed an identical quote in paragraph 9.33 that "we find the capacity study to be a helpful strategic guide, but we do not consider its findings to be capable of being pivotal to our assessment".
- **Upper Sonachan Wind Farm¹⁶**: debate here about the reasons for producing an updated 2017 LCS and the openness of that process, but paragraph 3.220 states "...I agree with the applicant that a capacity study provides a guide and that a proposal-specific assessment is required to determine potential impacts which is provided by the ES, FEI and other supporting environmental information in this case".

1.11.3 It is clear from these decisions by Reporters and the Scottish Ministers that LCSs should not be used as a basis for decisions on individual wind farm proposals. Despite these repeated decisions giving limited weight to LCSs, planning authorities continue to base refusals on these – the industry's inevitable challenge to these decisions results in wasted effort and resource by all parties involved. Detailed site and project specific assessments should be used and an assessment made of the relevant environmental and economic factors as part of the decision-making process. As NPF4 will not be adopted until 2021, the Scottish Ministers and/or Scottish Government should consider issuing a Ministerial Statement or Chief

¹³ Ref: WIN-270-1

¹⁴ Ref: WIN-190-5

¹⁵ Ref: WIN-270-9

¹⁶ Ref: WIN-130-2

Planner's Letter as an interim measure to confirm the status of Landscape Capacity Studies in light of the numerous planning appeal and s36 decisions

- 1.11.4 On a related point, the Scottish Government must engage in more detail with emerging local development plans (LDPs). LDPs often cut across the clear position advised in SPP161 which states that planning authorities should adopt the Group 1, 2 and 3 approach of SPP Table 1 **without refinement**. Some planning authorities have sought to argue that SPP162 enables them to cut back on Group 3 areas by applying local constraints not recognised in SPP Table 1 – this is the incorrect approach and has received no support at appeals or section 36 inquiries. Too often policies based on LCSs which explicitly defy the clear advice in SPP161 and Table 1 are adopted with no Scottish Government objection.

1.12 Planning Authorities and Statutory Consultees

- 1.12.1 The Scottish Government should make it clear in NPF4 that planning authorities and statutory consultees cannot adopt plans, strategies and/or guidance that contradict national policy. NPF4 should also confirm the status of LCSs and specifically limit the weight afforded to these by in decision-makers. Without this, there is a risk that NPF4 could be diluted sequentially through the hierarchy of plans and guidance, and restrict the deployment of renewable energy development at scale.
- 1.12.2 SNH has recently started objecting on grounds beyond their 'national interest' remit, including innogy's recently refused s36 project at Harryburn. **The role of SNH should be restated and realigned to ensure they do not stifle developments where there are no concerns that warrant a national interest objection.** A key issue that needs addressing is the recent use of the 'Landscape of Scotland' as justification for objection – the Scottish Government needs to make it clear that this does not constitute a reason for objection on 'national interest' grounds.

1.13 Scottish Planning Policy: Table 1 Spatial Frameworks

- 1.13.1 The SPP Table 1 Spatial Frameworks (Group 1, 2 and 3) approach has been a useful tool in terms of guiding onshore wind developments to suitable places but lacks the ambition and positivity required to provide certainty to developers and enable the level of deployment required to meet the 2045 net zero target. SPP Table 1 should be transferred to NPF4 subject to the following amendments:
- 1.13.2 The inclusion of National Parks and National Scenic Areas within Group 1 is appropriate and ensures that these highly valued international and national designations are afforded significant protection from inappropriate developments. Any **proposals to elevate World**

Heritage Sites (WHS) to Group 1 status should be resisted. innogy fully recognises the need to consider WHS designations as part of the development process but the impacts should be assessed on a case by case basis. innogy has recently responded to a consultation on the Flow Country World Heritage Site (FCWHS) (see Appendix A). innogy fully supports and recognises the value that blanket bog and peatland plays in helping to mitigate against climate change, however the FCWHS proposals raise significant policy implications arising from a new designation and relationship with the land use planning system. The proposed coverage of this new designation is vast in geographic terms. innogy has a number of renewable energy projects (operational, under construction and in development) in the Highland region, a number of which are within Caithness and Sutherland and within the geographical area that is the subject of the FCWHS. Wind farms, with well-considered layout and design, can decrease pressures on a site (and possibly wider geographic area by means of habitat restoration and management). Any proposal to elevate WHS to Group 1 would significantly constraint onshore wind development in the Highland region.

- 1.13.3 NPF4 needs to be as permissive as possible towards development in Group 2 and 3 areas so as not to unnecessarily constrain development. The **list of qualifying features in Group 2 should be reviewed**, particularly the nationally important mapped interests (i.e. wild land and carbon rich soils), and the community separation distance where the maximum distance is routinely applied by planning authorities with no consideration of landform and other features.
- 1.13.4 Even where environmental impacts are deemed to be acceptable, not all areas within Group 2 and Group 3 will be developable due to aviation or other constraints and/or a lack of (or prohibitively expensive) mitigation measures. The **Scottish Government should take a strategic view on aviation and other matters beyond the control of the planning system** in order to maximise renewable energy generation. This should include (as a priority) consideration of whether it would be appropriate to apply Group 1 status to a specified buffer around Eskdalemuir to avoid the current situation whereby a greater proportion of the 'budget' is used up by proposals in closer proximity to the installation, leaving those further away with lower impact unable to secure sufficient budget.
- 1.13.5 Proposals within Group 3 areas and Group 2 areas where the significant effects on the qualities of the areas have been "substantially overcome" by siting, design or other mitigation should carry a **presumption in favour of onshore wind development and an associated acceptance of landscape change**. In effect, proposals in Group 2 areas where the significant effects on the qualities of the areas have been "substantially overcome" would be afforded the same status as Group 3 areas (i.e. areas where wind farms are likely to be acceptable).

- 1.13.6 Other NPF4 policies should not contradict the aims of the Table 1 Spatial Framework (if retained in its current form), **specifically in relation to wild land areas**. In practice, there needs to be a realistic prospect of gaining consent in wild land areas which is currently undermined by the overly restrictive test in SPP 215 which states that “In areas of wild land (see paragraph 200), development may be appropriate in some circumstances” but that “Further consideration will be required to demonstrate that any significant effects on the qualities of these areas can be substantially overcome by siting, design or other mitigation” and SPP 200 (in the context of the development plan) which states that areas of wild land “are very sensitive to any form of intrusive human activity and have little or no capacity to accept new development”.
- 1.13.7 Attached at Appendix B is innogy’s map of potential developable area within wild land which demonstrates that 49% of this is already protected from development by Group 1 designations (i.e. National Parks and National Scenic Areas). Once other wind farm constraints are applied, only approximately 23% is theoretically developable (i.e. unconstrained from an onshore wind perspective) and this could accommodate approximately 26.2MW of potential installed capacity¹⁷. Realistically, it is sensible to reduce this figure by a further two-thirds (7.7% / 8.7GW), which accounts for the site-specific limitations of developable areas (landowner permissions, archaeology, set back from telecoms and roads, environmental impacts etc) and, furthermore, not all applications will be granted planning consent.
- 1.13.8 This demonstrates that the majority of areas designated as wild land will continue to be afforded protection against inappropriate development, but a slightly more permissive approach in wild land could make a significant contribution to Scotland’s 2045 net zero target.

1.14 Spatial / Mapped Approach

- 1.14.1 innogy is **opposed to any proposals to introduce maps of preferred areas for onshore wind in NPF4** (as mooted by Scottish Natural Heritage (SNH)) – if progressed by SNH, this will undoubtedly be landscape-led which ignores the other constraints and commercial considerations typically applied by wind farm developers (wind speed, topography, ecology/ornithology, transport, residential amenity, aviation etc). Pre-imposed spatial limits are likely to be an ill-informed and inappropriate constraints on the ability of industry to bring forward projects, especially in the context of the established need for renewable energy

¹⁷ Note: these figures are not definitive – they are based on innogy’s internal assumptions and publicly available constraints datasets. Actual developable area and potential installed capacity will vary depending on assumptions, and are not based on site specific environmental impact assessment (EIA) which will further constrain development.

projects and the need to accelerate decarbonisation in the context of the recently declared Climate Emergency.

- 1.14.2 The Table 1 Spatial Framework approach provides adequate guidance before site specific assessments by developers, which will include (amongst other matters) landscape considerations. The Scottish Government should be cautious not to repeat the experience in Wales under Technical Advice Note 8 'Planning for Renewable Energy' where the spatial approach categorically failed to deliver on installed capacity targets.