



Scottish Government
National Planning Framework 4: Call for Ideas
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Dear Sirs,

National Planning Framework 4: Call for Ideas

RES (Renewable Energy Systems) is the world's largest independent renewable energy company and has delivered over 16 GW of renewable energy generation across the UK, Europe, the Americas, Asia and Oceania. We have developed and constructed over 1,000MW of renewable energy projects across the UK and Ireland and are currently constructing Solwaybank Wind Farm in Dumfries and Galloway and about to commence construction work at Blary Hill Wind Farm in Kintyre. RES welcomes the opportunity to engage at an early stage in the review and development of new national planning policy in Scotland.

Context

Before addressing specific policy issues, it is worthwhile briefly setting out the policy context against which NPF 4 will be developed. On the 14 May 2019 the Scottish Government declared a Climate Emergency. This was done against a backdrop of other significant Reports and Statutory provisions which emerged throughout 2019 including:

- The Committee on Climate Change (CCC) Report on 'Net Zero' in early 2019
- The Climate Change (Emissions Reductions Target) (Scotland) Act 2019

The Climate Change (Emissions Reduction Targets) (Scotland) Act 2019 received Royal Assent in October 2019. This Act requires "Scottish Ministers to ensure that the net Scottish emissions account for the net-zero emissions target year is at least 100% lower than the baseline (the target is known as the 'net-zero emissions target')." The target year is 2045 and the Act also sets out challenging interim targets. It requires that:

The Scottish Ministers must ensure that the net Scottish emissions account for the year:

- (a) 2020 is at least 56% lower than the baseline,
- (b) 2030 is at least 75% lower than the baseline, and
- (c) 2040 is at least 90% lower than the baseline.

Regarding the Committee on Climate Change (2019), the Net Zero Technical Report which accompanied the main publication, outlined the importance of meeting new zero targets through electrification of sectors such as transport and heat. Indeed, the Report highlights that, '*Significant new renewable generation capacity is needed to accommodate rapid uptake of electric vehicles and hybrid heat pumps. Over the period to 2035, up to 35 GW onshore wind, 45 GW offshore wind and 54 GW solar PV could be needed. Further deployment is likely to be needed over the period to 2050.*'

The CCC made it clear in recommendations that changes to Planning policy would be necessary if net-zero is to be achieved.

Scottish Government - Scottish Energy Strategy (SES) (2017)

The SES was published in December 2017 and sets out the Scottish Government's strategy through to 2050, marking a '*major transition*' over the next 3 decades in terms of energy management, demand reduction and generation.

SES sets a new 2030 'all energy' target for the equivalent of 50% of Scotland's heat, transport and electricity consumption to be supplied from renewable sources. The Strategy also targets an increase by 30% in the productivity of energy use across the Scottish economy.

The Strategy sets out the six energy priorities for Scotland's energy system in 2050, one of which relates to the continued need for renewable and low carbon solutions as a means of meeting the Scottish Government's emissions reduction targets. It continues to note that Scotland needs to build on the progress made in decarbonising electricity production, stating that Scotland is determined to play its part in the global effort to tackle harmful climate change.

There is an acknowledgement that the possible electrification of heat and transport on a large scale could place much greater demand on the renewable electricity sector. Accordingly, SES notes that achieving the equivalent of 50% of Scotland's heat, transport and electricity consumption to be supplied from renewable sources by 2030 will be challenging but the target '*demonstrates the Scottish Government's commitment to a low carbon energy system and to the continued growth of the renewable energy sector in Scotland*'.

SES asserts that renewable and low carbon energy will provide the foundation of our future energy system, offering Scotland a huge opportunity for economic and industrial growth.

Summary

National Planning Framework 4 (NPF4) will be Scotland's National Development Plan until 2050. Given the context in which NPF4 will be prepared it is essential that the Climate Emergency and the Government's commitment to address it is central in the drafting of NPF4 and in shaping future development across Scotland.

The Scottish Government has previously acknowledged, in the Scottish Energy Strategy (SES) (2017) and the Onshore Wind Policy Statement (OWPS) (2017), the valuable role that the onshore wind industry has, and will continue to play in helping Scotland achieve its renewable energy targets and combating man-made climate change. Onshore wind offers the most cost-effective choice for new electricity in the UK and continues to retain the support of the general public, regularly enjoying support levels of up to 74% (YouGov, 2018) and more recently 83% (BEIS: 2020).

With combating climate change at its core, NPF4 must ensure that it creates a supportive planning environment for renewable energy technologies, including the repowering of older onshore wind farms and the identification and delivery of new development opportunities.

Call for Ideas – Response to Main Themes

What development will we need to address climate change?

NPF4 will become part of the statutory development plan, carrying more weight than ever before in decision making. NPF4 must address the climate emergency and in particular positively encourage technologies that can contribute to this challenge. There should be a presumption in favour of sustainable development and

within that, the policy framework that the draft NPF4 sets out should aim to encourage and promote the delivery of significant additional renewable energy deployment in order to meet the Government's own commitments towards tackling climate change.

Onshore Wind

Onshore wind is already a significant part of the UK's energy mix and, as the cheapest source of new generation, alongside solar, will have a vital part in meeting the Government's energy and climate change targets.

NPF 4 should clearly and unequivocally set out the need for the approval and deployment of new renewable electricity generation and specifically onshore wind. A clear direction should be given to decision makers to place substantial weight on the benefits that will arise from onshore wind, either through new development, repowering or the life extension of existing projects.

There should be a presumption in favour of applications seeking to extend the operational life or repowering of existing projects, albeit subject to the necessary assessment of effects.

Turbine Technology

Turbine technology has evolved significantly over the last decade with both the installed capacity and dimensions of machines significantly increasing. Turbines are procured within a global market, with suppliers matching supply to global demand. Despite the need for the deployment of more onshore wind, turbine manufacturers do not view the Scottish or UK market as large enough to justify the production of bespoke "smaller" turbine models. Consequently, the procurement of older, smaller turbine models has become significantly harder and more expensive. This is reflected in recent submissions, for instance, in 2019 the average tip height for turbine being scoped for prospective onshore wind farms was 160m. This was up from 135m in the previous year for projects which were scoped by the relevant authority.

Larger turbines for onshore wind farms will therefore inevitably become a more common feature across Scotland simply as a reflection of the advances in turbine technology, the availability of turbines from the market, the economic realities of a subsidy free era and the probabilities of older schemes coming to be repowered in the near future.

With an aspiration to guide development over the next thirty years, it is therefore vital that NPF4 recognises the technological advances that have and will likely continue to be made in the industry and should create a framework flexible enough to accommodate future advances in technology and the industry's place in a global market. This point is not necessarily only relevant to onshore wind, but it is vital that NPF4 doesn't become fixed by the standards of 2020/21 and can be reviewed and updated to ensure that it remains reflective of modern world.

Furthermore, due to the new fleet of modern turbines overlapping with existing operational schemes, it is inevitable and unavoidable that there will be a difference in scale from older wind farms. In RES' experience, in some instances there has a tendency from decision makers to compare prospective sites and existing sites and an expectation that the consent should be awarded for a similar scale. This needs to be addressed in NPF4 and should not be used by decision makers as a reason for refusing proposed sites. NPF4 should acknowledge that advances in technology will mean that onshore wind turbines will become larger and more efficient and that this represents a significant opportunity for onshore wind to significantly contribute to the Government's electricity generation targets.

Spatial Strategy

The experience of Wales of TAN8 has shown that the allocation of land for the development of onshore wind farms has not been successful and has failed to deliver the necessary scale of deployment of new sources of

renewable energy to meet that country's renewable energy targets. This should not be replicated in Scotland.

RES believes the spatial approach set out in Scottish Planning Policy (2014) has generally been successful and should be retained. It has provided sufficient guidance for the industry, statutory consultees and determining authorities in understanding the policy framework against which an application should be considered.

There should be no expansion of Group 1 Areas where onshore wind farms will not be supported, ensuring that there is no development in either the National Parks or National Scenic Areas. For the avoidance of doubt there should be no buffers added around these areas.

SPP currently identifies Group 2 Areas as *"areas [where] wind farms may be appropriate in some circumstances. 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"*. It is clear that development could and should be acceptable within these areas subject to appropriate design and/or mitigation. However, in respect of Wild Land Areas (WLAs) these have effectively been treated as 'designation', although never intended to such, and have formed a significant constraint to development. Their positioning within Group 2 indicates that the identification of these areas should not in itself be a barrier to development and therefore consideration should be given to rewording of paragraph 215 of SPP which sets out a policy 'test' against which development in WLAs should be considered.

For the avoidance of doubt, paragraph 196 of SPP should be retained where it notes that *"Buffer zones should not be established around areas designated for their natural heritage importance"*. While WLAs are not a 'designation' the establishment of buffers around these areas should be avoided.

With regard to Group 3: Areas with potential for wind farm development, SPP notes that *"Beyond groups 1 and 2, wind farms are likely to be acceptable, subject to detailed consideration against identified policy criteria"*. In light of the above noted policy context it is respectfully requested that the Scottish Government could amend this approach to apply a presumption in favour of onshore wind development in Group 3 Areas and apply the current test in paragraph 33 of SPP where consent should be granted unless adverse impact significantly and demonstrably outweigh the benefits of the proposed development.

Repowering and Life Extension

The Scottish Government's Onshore Wind Policy Statement discusses repowering of existing onshore wind sites. It states in paragraph 35 that *"The Scottish Government's position remains one of clear support in principle for repowering at existing sites"*. The same paragraph acknowledges that this is on the basis that making use of existing sites and continuing to use existing infrastructure, grid connections and good wind resources will provide a cost-effective means of delivering renewable and decarbonisation targets. As such, repowering existing onshore wind farms, on sites where the principle of development has been established and where the wind turbines have become an accepted feature of the landscape, will be essential in achieving net-zero targets.

Life extension and repowering of existing renewable energy projects is critical to support the country's energy ambitions. More than 60 onshore wind farms will pass the 20-year operations mark within the next five years, and repowering could increase existing capacity threefold with new, more efficient technology.

However, repowering an existing renewable energy project is not as simple as returning to the original, approved application. The absence of subsidy support has made it necessary for developers to increase scale and capacity to harness more power – but rises in efficiency and capacity are proportional to increases in turbine size and changes in farm layout.

For the draft of NPF4, RES would advocate for a standalone and supportive policy framework to be set out for repowering which seeks to clarify the following:

- The baseline for Environmental Impact Assessment at a repowering site should be that of the existing wind farm and not a greenfield or fully decommissioned/restored site;
- NPF4 should include a presumption in favour of repowering and lifetime extensions, recognising the presence of an existing scheme and the clear environmental and economic benefits in doing so; and
- NPF4 should require a proportionate approach to be taken to the consenting of repowered projects given their location on and around previously developed sites.

Time Limited Consents

It has become normal for decision makers to grant temporary consent for onshore wind farms for a 25-year lifetime. However, there is no engineering justification for this.

Paragraph 170 of SPP notes that areas identified for wind farms should be suitable for use in perpetuity. As such, onshore wind should, like other development types (e.g. large housing developments, major infrastructure), be granted consent in perpetuity. Given that it is common place for consented schemes to have conditions attached requiring turbines or the project to be decommissioned if the wind farm is not exporting electricity for a prolonged period of time it is clearly not necessary for consents to be time limited.

Landscape Sensitivity Studies and Capacity Studies

Local Planning Authorities have, over time, created Landscape Capacity Studies (LCS) and designated these documents as Supplementary Guidance to the main policies contained within their Local Development Plans. These studies attempt to create a local spatial strategy for onshore wind farm development which often does not reflect the National Spatial Strategy set out in Scottish Planning Policy. The issue with the LCSs to date has been that the more useful Landscape Sensitivity Study (LSS) stage in the documents are then followed by an attempt to discuss and reach a conclusion on capacity. This effort is fundamentally flawed as there is no identified capacity target for wind energy to base this on.

This is exacerbated by an assumption from the limited pool of landscape professionals engaged by PAs and SNH to conduct these studies that the more development that has taken place the less capacity there will be for further development. This approach seeks to deny the application of (a) the need case for renewables and (b) the application of other constraints when assessing a planning application. This approach is at odds with Scottish Government (SG) policy in Scottish Planning Policy (SPP) 161 and Table 1, and undermines decision making for onshore wind development.

NPF4 should require local planning authorities to replace Landscape Capacity Studies with Landscape Sensitivity Studies as the starting point for the assessment of projects. LSSs should be strategic studies designed to provide high level information to assist decision makers through identifying relative sensitivities within the landscape. They should be used to inform the baseline of site-specific Landscape Visual Impact Assessments (LVIA). LSS should not specify “appropriate” turbine heights, nor seek to impose arbitrary height restrictions on wind turbines nor should they be used as a means to assess an individual project’s suitability. Planning policy should instead recognise that site-specific LVIAs be afforded primacy in informing the overall acceptability of a scheme and all proposals should be considered on a case-by-case basis by planning authorities or Ministers.

Energy Storage

Electricity storage comes in many forms and is a source of flexibility for the energy system. It can support the integration of low carbon technologies, reduce the overall costs of operating the system and help avoid or defer costly reinforcements to the networks. Electricity storage is already being deployed across Great Britain (GB) and there is currently around 3GW of storage on the system, the vast majority of which is pumped hydro. National Grid’s Future Energy Scenarios (FES) predicts that between 12-29GW of electricity storage could be deployed by 2050.

The Committee on Climate Change Technical Report (2019) makes it clear that, as we move to an electricity system largely based on renewables, more energy storage facilities will be needed to balance supply and demand. SES (2017) also acknowledges the importance the Energy Storage will play in the flexibility of the UK's energy system going forward towards 2050 where there is an ambition to achieve a net-zero system.

The draft for NPF4 should create a policy framework to ensure consents for energy storage developments are favourable where located in suitable locations and deal in a proportional and swift manner.

Solar

While solar capacity in Scotland increased rapidly in the first half of the last decade (2 MW in 2010 to 326 MW in 2016), progress has slowed in recent years, rising slightly to 344 MW in 2018. There is significant growth potential for all forms of solar energy development in Scotland, from domestic rooftop PV and solar thermal to ground-mounted large-scale schemes. Like onshore wind and hydro, solar development has suffered from the removal of a market subsidy alongside a rapid growth in costs from government policy and regulation. In many cases these are disproportionate and unjustified, despite solar being one of the lowest cost forms of renewable energy deployment.

NPF4 offers an opportunity to support a significantly increased ambition for solar deployment in Scotland, particularly where the planning and policy environment can help reduce cost burdens.

NPF4 should create a supportive policy environment whereby continued investment and confidence can be instilled in the deployment of this technology.

Energy Efficiency and Carbon Calculation

Onshore Wind Farms are required to provide a carbon calculation with each application setting out the expected time each development will take to "pay back" the carbon generated in its construction.

While the generation of renewable energy is vital in the Country's efforts to address climate change it is noted that the inefficient use of energy is a significant issue. All new developments, whether they are retail, residential or energy development must reflect the climate emergency and make their own contribution, whether through efficient design or incorporation of micro-renewable energy.

Similarly, all new developments should be required to undertake a carbon calculation where proposed developments identify the likely carbon cost of their construction and detailed proposals on how this will be offset.

Yours sincerely,



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