

Position Statement

- National Planning Framework 4

This document sets out Scottish Renewables members' views on what will need to be included in National Planning Framework 4 (NPF4) to deliver the level of renewable energy technology deployment needed to meet Scotland's Climate Change commitments and achieve net-zero by 2045.

1 Legislative Context

On 31 October 2019, the *Climate Change (Emissions Reduction Targets) (Scotland) Act 2019* received Royal Assent. The Act requires that “Scottish Ministers must 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.

2 Wider Policy Context

In its advice to the UK and Scottish Governments on achieving the net-zero target, the UK Committee on Climate Change (CCC) stated that renewable electricity generation “must quadruple” and states that the Scottish Government should make “use of planning powers to drive decarbonisation.”

Significant deployment of additional renewable energy capacity, well in excess of historical deployment levels, is needed to achieve our climate change commitments. The existing policy frameworks for renewable energy technologies — the National Planning Framework (NPF), Scottish Planning Policy (SPP), the Scottish Energy Strategy (SES) and Onshore Wind Policy Statement (OWPS) — are now significantly out of date and must be materially enhanced to enable the scale of deployment required.

In the Scottish Programme for Government (PfG) in September 2019, the First Minister stated that planning policy will undergo a “fundamental review”, headlining the need for planning policy to “more radically reduce emissions.” She highlighted that “the global climate emergency means that the time is right for wide-ranging debate on more radical planning policy options.”

Scottish Renewables agrees that the Scottish Government commitment to a 75% cut in emissions by 2030 and net-zero by 2045 requires substantial changes to current planning policy. We also agree that more radical planning policy options to allow a more positive and supportive approach to the wide-scale deployment of renewable energy technologies will be needed.

Scottish Renewables therefore sets out this Position Paper as a call to Government to ensure that NPF4 addresses the planning policy barriers that are currently obstructing the deployment of renewable technology, particularly at the scale required to meet our energy and climate change targets.

3 Overarching Principles

NPF4 will become part of the statutory development plan, carrying more weight than ever before in decision making. To create the policy framework that will facilitate the significant deployment of additional renewable technologies, the following matters must be addressed.

3.1 Net-zero and the Climate Emergency

- The climate emergency should be central to planning policy with the 2030, 2040 and 2045 targets embedded in NPF4 to ensure these are core considerations in policy and decision-making.
- As in previous versions of the NPF and SPP, these targets should be regarded as setting a minimum level of ambition, not a cap.
- The planning process is not currently set up to focus on the climate emergency and net-zero. Significant attention should be given to refocussing the planning process to address these. The starting point should be that the climate emergency and net-zero should be given substantial weight as key material considerations in every planning decision.
- Significant effort should be made to ensure that planning authorities and other decision makers have the necessary tools, resources, training and policy direction to consider planning applications in the context of the climate emergency and net-zero.

3.2 Ensure Consistency and a Joined-Up Approach Across Government

- NPF4 should make explicit provision for substantial weight to be given to current and future drafts of the Climate Action Plan, Onshore Wind Policy Statement, Scottish Energy Strategy, Marine Scotland's Sectoral Marine Plan (SMP) for Offshore Wind Energy, the Offshore Wind Policy Statement and the National Transport Strategy in decision making.
- Although Government intends that the NPF4 should provide a "coherent vision of how Scotland should evolve over the next 20-30 years," it has a 10-year life span and therefore it should focus on delivering the 2030 target as a principal objective.
- NPF4 should also make provision for future national policy to provide clarifications should the policy response to climate change need to evolve.

3.3 The Presumption in Favour of Sustainable Development

The SPP 2014 introduced a presumption in favour of development that contributes to sustainable development. The Planning (Scotland) Act 2019 states the purpose of planning is "to manage the development and use of land in the long-term public interest".

Renewable energy development is both sustainable development and in the long-term public interest. There should be explicit support in planning policy for renewable energy development in terms of its potential to contribute to achieving net-zero, sustainable development and the long-term public interest.

- NPF4 must make clear that renewable energy developments are in the public interest and constitute sustainable development as they assist in achieving the 2030 and 2045 net-zero targets.
- NPF4 must make clear that achieving the 2030 target requires significantly increased renewable energy generation.
- NPF4 should reiterate that there is a presumption in favour of renewable energy to deliver sustainable development.
- The wording of the presumption in favour of sustainable development in the current SPP should be simplified within NPF4 and should express policy support for sustainable development that contributes to climate change objectives.

- All decision makers should explicitly engage with this presumption and be required to demonstrate how it has been applied in decision making.

3.4 Investment Context and the Impact of Planning Process on Project Viability

Historical deployment of onshore renewables has been supported by financial incentives through the Renewables Obligation (RO) and Contracts for Difference (CfDs). The RO is no longer available and CfDs are only available at present for a limited number of onshore projects on remote islands. Deployment at scale must now be achieved on a zero-subsidy basis, which requires barriers to deployment to be addressed through policy, such as ensuring policy drivers at Scottish Government level are given proper effect in local decision making.

3.4.1 Delivering consents swiftly and consistently

Positive planning policy is a vital tool to support commercial viability in a zero-subsidy environment and is a central factor in creating jobs in a strong supply chain. To best facilitate deployment at scale, both for large projects and volumes of smaller-scale projects, planning policy must create investor confidence by supporting the delivery of consents swiftly, with consistent outcomes and at reasonable cost.

This will provide investors and developers with more certainty as they move forward with their projects in a zero-subsidy environment. A planning system that delivers viable projects over the short to long-term with greater project certainty will assist developers by creating the right investment platform to build their development pipeline. This pipeline will support the wider supply chain to develop.

The current consenting regimes often result in the lengthy determination of applications for consent for projects that are not overly complex. This can often be due to the resourcing of the determining authority. There are also inconsistencies between the way planning authorities interpret the planning system, resulting in differing approaches to the application of procedure and policy. We strongly believe that the planning application determination process must be shorter, better resourced and more predictable if renewable energy projects are to be cost effective and viable.

- NPF4 should contain measures to ensure that the application of the planning process is consistent between planning authorities.
- NPF4 should contain measures to ensure the delivery of consents swiftly, with consistent, more predictable outcomes and at reasonable cost.
- Additional resources and training should be made available to stakeholders to ensure positive planning outcomes are achieved.

3.4.2 Efficient and proportionate Environmental Impact Assessments (EIAs)

More efficient and proportionate Environmental Impact Assessments (EIAs) are required if deployment at scale is to be achieved on a zero-subsidy basis.

The EIA Regulations state that the purpose of EIAs is to establish “likely significant effects on the environment that could arise from implementing a project”. However, it is our members’ experience that planning authorities and stakeholders such as SNH and SEPA are still asking for a level of detail to be included within EIA Reports that goes beyond the intention of the Regulations.

- NPF4 should make a clear distinction between the reporting of significant effects predicted within an EIA Report and the decision-maker’s role in determining whether such significant effects are acceptable.
- We also recommend that stakeholders such as SNH and other agencies should only comment on the assessment of effects likely to arise from a project, rather than on the acceptability of those effects, which ultimately should be a judgement for the planning decision-maker.

4 Onshore Wind

4.1 Consents in Perpetuity and for Onshore Wind

Unlike other industries and other renewable technologies, onshore wind planning consents are issued for limited consenting periods, usually 20-25 years. This may have made sense when wind turbines were an emerging technology and their likely operational lifespan was poorly understood. However, onshore wind is now a mature technology, an established and widely supported part of our electrical infrastructure and the cheapest source of electricity generation.

Under NPF4 onshore wind should be treated in the same manner as other industries and granted consent in perpetuity. It is our expectation that developers will still be required to include plans for the decommissioning of a scheme if it is not operational over a period of 12 months or within a timescale which is otherwise agreed with the planning authority.

- Under NPF4 renewable energy developments should be consented in perpetuity in line with other developments.
- Planning authorities should only be able to impose time-limited consents if they can demonstrate exceptional circumstances for requiring a temporary permission.

4.2 Modern Turbines

Following the withdrawal of support under the Renewables Obligation (RO), there are approximately 3.5GW of onshore wind schemes that are consented but unbuilt. Very little of this 3.5GW capacity with planning permission is likely to be viable without the use of modern turbines. To unlock this capacity, these projects may need to be re-consented to allow for the use of modern turbines with taller towers, larger rotors and increased blade tip heights.

The Scottish Government recognises the need to enable developments with modern turbines in the 2017 OWPS: “We acknowledge 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 provide a supportive policy context for the installation of modern turbines and have the flexibility to accommodate the speed of technological change in turbine design.
- The new policy approach must go beyond the rhetorical phrase “the right development in the right place.” NPF4 should recognise that addressing the climate emergency will have some development impact on landscapes and the acceptability, or otherwise, of any significant landscape effects must be considered in light of the climate emergency and our net-zero target.
- New onshore wind energy development will be different in scale from older wind farms as they will incorporate more modern turbine designs. NPF4 should set out that only limited weight should be afforded to scale disparities between new and “legacy” turbine schemes given the climate emergency and the vital role that onshore wind will have in achieving the net-zero target. Such differences in scale should not be an argument against new development.

4.3 Repowering and lifetime extensions of onshore wind

As 2030 approaches, a significant number of wind turbines will reach the end of their planned life. Generators will be faced with the decision to extend the consented temporary operational period by further application for consent, fully repower the wind farm or decommission it. Extending the life of a wind farm enables further renewable electricity to be generated without major new capital investment. Repowering offers the opportunity to increase the amount of renewable electricity generated by a site by replacing aging turbines with the latest technology.

It is essential that the role repowering is likely to play in generating the energy needed to achieve net-zero is not underestimated. The CCC Technical Report published in May 2019 indicated that Scotland would need to increase its onshore wind capacity from today's 8GW to at least 21GW by 2035. If Scotland's existing wind farms are decommissioned, then Scotland will lose up to 5GW of existing capacity¹ by 2040 making it much harder to achieve a minimum of 21GW by 2035.

To provide the clarity and certainty that is required around repowering:

- NPF4 should include the Scottish Government's "clear support in principle for repowering at existing sites," as stated in the OWPS.
- The baseline for EIA at a repowering site should be that of the existing wind farm.
- NPF4 should include a presumption in favour of repowering and lifetime extensions, recognising the presence of an existing scheme and the clear climate change and economic benefits in doing so.
- NPF4 should require a proportionate approach to be taken to the consenting of repowered projects given their location on and around previously developed sites.

4.4 Turbine Blade Length Extension

In addition to advances in technology making repowering an attractive option for increasing the amount of renewable electricity generated by Scotland's existing onshore wind farms, it is now also possible to increase the output of existing turbines by extending or replacing turbine blades.

Current planning policy does not take account of this advance in technology and has no established process for addressing blade length extensions. It is our view that blade extension at existing wind farms should be explicitly supported by policy and be considered for permitted development rights (PDR). This would provide a rapid and cost-effective way of increasing the production of renewable energy in Scotland to meet our net-zero target.

- NPF4 could contain guidance that the replacement of blades should not generally be regarded as development unless it materially alters the appearance of turbines.
- NPF4 should explicitly support blade length increases on existing projects, by an agreed amount and PDR should also be considered.
 - This amount should be either a set percentage of the original length or an absolute change to be set by Scottish Ministers.
 - Only where such a change would have a potential impact on significant bird species identified by the Scottish Wind Farm Bird Steering Group as being sensitive to wind farms would approval be required by the planning authority.

4.5 Extensions of existing wind farms

In addition to repowering existing wind farms, extending a site with additional turbines is a very effective way to deploy additional renewables capacity. Such extensions make best use of existing infrastructure such as access tracks, substations and grid connections, in addition to helping developers reduce costs.

Current planning policy does not take the sustainable development benefits of wind farm extensions into account and, as a result, the outcomes of applications to extend can be unpredictable and uncertain. To make the best use of existing infrastructure it is highly desirable that NPF4 brings more clarity and certainty to this process.

- NPF4 should recognise the sustainable development benefits of wind farm extensions and should create a policy framework to ensure consents for wind farm extensions are dealt with swiftly, consistently and with predictable results.

¹ Figures from RenewableUK's repowering report Onshore wind: The UK's Next Generation, April 2019

4.6 Landscape Capacity/Sensitivity Studies

Landscape Capacity Studies, prepared on behalf of planning authorities, have been produced by a very limited number of landscape consultants who do not generally advise on commercial onshore wind energy developments. These outdated studies do not take into account the climate emergency, treat onshore wind turbines as an inherently negative development propositions, and are out of sync with the overwhelming level of public support for wind turbines in the environment. Several of these studies state that specific sized wind turbines are unacceptable in certain locations and are often used as grounds for objecting to developments.

Landscape Capacity Study-based objections to wind farm proposals are often overturned by Reporters at appeal. There are many example planning decisions to illustrate this, which clearly demonstrates a lack of fitness in the way such studies are prepared and applied by planning authorities to decision making.

NPF4 should prevent the preparation of further Landscape Capacity Studies and replace them with Landscape Sensitivity Studies, as has already been agreed with SNH. Landscape Sensitivity Studies (LSS) 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), incorporated into EIAs.

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.

- NPF4 should replace Landscape Capacity Studies with Landscape Sensitivity Studies to inform site-specific project assessment, not overrule them.
- Scottish Government should prepare guidance in collaboration with stakeholders setting out how Landscape Sensitivity Studies should be prepared and used.
- NPF4 should state that Landscape Sensitivity Studies used to inform planning policy should be properly consulted upon.

4.7 Scottish Planning Policy Table 1 – Spatial Frameworks

It is recognised that the constraints set out in SPP Table 1, categorising land as either Group 1, 2 or 3, has assisted, to some degree, in site selection and the delivery of consents for onshore wind to date. However, it is our view that it will not be possible to achieve the level of onshore wind deployment needed to achieve net-zero, without changes to Group 2, either to remove highly subjective considerations like wild land or to change the way they are dealt with in policy to achieve positive development outcomes. Furthermore, a more permissive approach should be taken toward Group 3 areas in light of our net-zero targets.

Decisions on the suitability of wind farm developments outside Group 1 areas should be evaluated on a case-by-case basis by planning authorities or Ministers who are able to balance the extent of effects with other important policy objectives such as the climate emergency and the rural economy. Decisions should be ultimately informed by site-specific LVIAs and EIAs rather than through the application of constraint-based mapping within Local Development Plans (LDPs).

The current Group 2 policy is too restrictive, not fit for purpose and obstructs the ability of democratically elected planning authorities and Ministers to make decisions in the long-term public interest and stimulate regeneration in the rural economy.

SPP Table 1 has been in effect since 2014 and it has resulted in most applications for renewable energy projects in and adjacent to Group 2 wild land areas being refused, even in some instances when supported by local planning committees. Projects refused include Sallachy, Glencassley, Beinn Mhor, Culachy, Limekiln, Glenmorie, Allt Duine, Carn Gorm and Caplich, resulting in a negative impact on the economic development of communities in these areas.

The Scottish Government has consistently ruled out making wild land a designation and did so again most latterly during the passage of the Planning (Scotland) Act 2019 through Parliament. Its inclusion within Group 2 and its subsequent interpretation in decision making and day-to-day practice amounts to that of a designation. NPF4 needs to deal with this.

More generally, we advocate against drawing up map-based spatial plans for distributed forms of energy generation such as onshore wind whether this is on a regional or national basis as it is a fundamentally flawed approach. Such an approach does not allow for other important locational factors such as grid, land and transport access to be appropriately considered.

A national spatial planning approach was attempted in Wales using Welsh Technical Advice Note 8 (TAN8), intended to facilitate the deployment of 1666MW of onshore wind from seven defined Strategic Search Areas by 2017. Instead TAN8 caused delays, led to excessive costs and ultimately led to missed targets for renewables deployment with only 565.8MW delivered by 2018.

- NPF4 should remove wild land from Table 1 or ensure that the accompanying policy position is significantly more positive towards consenting renewable energy development in Group 2 areas. The current policy wording in essence creates a no-go designation for commercial scaled wind energy developments – this is proven by the fact that no consents have been forthcoming for any turbines within wild land. Creag Riabhach, a project which had some turbines in a wild land area, was consented but was deemed by Ministers to be contrary to SPP.
- NPF4 should recognise that landscape capacity and landscape accommodation are subjective matters that should be weighed in the planning balance with more certain matters such as the climate emergency and the need for sustainable rural energy development to address it.

5 Energy Storage and Co-location of Renewable Technologies

The CCC Technical Report published in May 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. It also makes clear that the co-location of renewables technologies, for example installing solar panels on wind farm sites, is an effective way to increase generation while minimising the need for costly reinforcements of the electricity grid which increase energy bills.

Energy storage solutions and the co-location of storage technology at scale is a rapidly developing field. Whilst pumped storage currently provides the main form of energy storage on the grid, battery technology is rapidly progressing to the point where it will provide substantive energy storage volumes. New technologies such as chemical and mechanical storage are also being developed, which could in time bring balancing benefits to our grid.

As more applications that include storage and co-location will be coming forward, a proportionate and consistent approach to consenting these projects will be needed.

- NPF4 should create a policy framework to ensure consents for energy storage and co-location are dealt with swiftly, consistently and with predictable results.
- NPF4 should have the flexibility to accommodate the speed of change in energy storage and co-location technologies.
- Scottish Government should work with stakeholders to consider the scope for including some aspects of energy storage and co-location within PDR.

6 Offshore Wind

To achieve net-zero, it is expected that offshore wind will provide around 30% of the UK's energy. The Scottish Offshore Wind Energy Council (SOWEC), chaired by the Energy Minister, has an ambition to deploy at least 8GW of offshore wind in Scottish waters by 2030 to keep Scotland on track to meet its net-zero target.

While the majority of infrastructure for this will be offshore, such developments also include significant onshore infrastructure, particularly substations and cable routes, as well as the development of port infrastructure. It is essential that planning policy takes account of Scotland's offshore wind ambitions and provides a supportive framework to facilitate the development of the onshore aspects of these schemes.

Transmission infrastructure needed for offshore renewables is currently classed as National Development. This has provided legislative and planning policy support for offshore wind in particular. This should be extended to all onshore infrastructure that forms part of offshore renewable projects.

- NPF4 should make explicit provision for substantial weight to be given to current and future drafts of the SMP and Scottish Government's Offshore Wind Policy Statement in decision making to facilitate the terrestrial requirements for the delivery of offshore wind.
- As the NPF4 has a 10-year life span, it should make provision for future national policy to provide policy clarifications should the policy response to climate change need to evolve.
- NPF4 should retain and expand the National Development designation for the onshore elements of offshore renewable projects.

7 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 incentive mechanism 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.

In pursuit of achieving net-zero, a target of 6GW for solar PV and 170MWh for solar thermal by 2030 would be reasonable. This could create over 8,000 quality Scottish jobs annually, £1.3bn annual increase in GDP, power to 1.53m homes and a reduction of 2.31m tonnes of CO₂ emissions.

- Although subject to current policy review, the NPF4 should reinforce the case for PDR for rooftop solar, and consider extending this to ground-mounted systems at scale and co-location with other technologies.
- NPF4 should include presumption in favour of solar developments on brownfield sites in order to bring them into productive economic use.
- NPF4 should ensure that EIAs for solar are limited to exceptional matters of potential high significance (such as impact on protected species) given that solar in general has very limited and localised effects.
- Solar projects must be positioned in locations where solar irradiation can be maximised (whether on buildings or ground mounted) and under NPF4 this should be a material consideration, given the climate emergency.

8 Hydro

Scotland has the UK's highest mountains and largest inland lochs in addition to high rainfall. This makes Scotland an excellent location for the production of hydroelectricity. Between 1934 and 1965, 54 main power stations and 78 dams were built, providing a total generating capacity of over 1,000MW. As a result, Scotland now has 85% of the UK's hydroelectric energy capacity.

Hydroelectric schemes continue to be built in Scotland with run of river, storage hydro and small-scale projects delivering significant social and economic benefits across the rural areas of Scotland, powering many thousands of Scottish homes.

Scotland also has two pumped-storage hydro-electric power stations, Cruachan and Foyers/Loch Mhòr, which pump water back up to a storage reservoir during periods of off-peak demand. They can then use this stored water to generate electricity during periods of peak demand; an important component of balancing our electricity supply and demand.

Pumped storage hydro projects are recognised as nationally important within NPF3. NPF3 also gives explicit support for further development at Cruachan due to its significant potential for enhanced capacity. Pumped storage hydro schemes should continue to be recognised as nationally important within NPF4 given their wide and varied benefits to the energy system. NPF4 should also provide a supportive policy framework for the development of new pumped storage projects as more grid balancing services will be needed as we move towards net-zero.

- NPF4 should provide a supportive policy framework for the development of further small-scale hydroelectric schemes, particularly in rural areas. This should include:
 - The installation of penstocks (pipelines) above ground being considered acceptable with the provision that a visual impact assessment would be required in Group 1 areas.
 - Hydro power houses should only be required to be clad in similar styles to the local vernacular and should not have higher requirements placed upon them.
 - The costs of concealing pipelines can make small-scale schemes uneconomic and planning conditions requiring this should be proportionate to the scale of the scheme.
- NPF4 should recognise Scotland's pumped storage hydro schemes as nationally important due to their benefits to the energy system.
- NPF4 should provide a supportive policy framework for the development of new and existing pumped storage hydro schemes in Scotland as an important contribution to the stability of our energy supply.

9 Renewable Heat

Heat generation accounts for around 50% of Scotland's energy use. Currently, only 6% of heat in Scotland comes from renewable sources.² Reducing emissions from heat generation will be crucial if Scotland is to meet its net-zero target.

A Heat Networks Bill will be laid before Parliament in 2020 and with further supporting policy being developed by Scottish Government in collaboration with stakeholders. There is a Scottish Government requirement for all new homes to use renewable heat from 2024 and the Scottish Government is also exploring how to drive energy efficiency and low-carbon heat in existing buildings.

Planning policy must play its role in this national push to decarbonise heat generation. This can be achieved by directing applicants to address renewable heating at an early stage of development, and in directing larger

² Energy Saving Trust, 2019, Renewable Heat in Scotland

developments to incorporate or connect to heat networks, particularly in locations where this could support a district-wide scheme.

The Scottish Government's Energy Efficient Scotland delivery mechanism should support planning authorities in the negotiation of planning applications and the setting of heat network obligations. This would help overcome the challenges that planning authorities may face in vetting applications.

- NPF4 should require all proposals for new development to provide their primary heating requirements with renewable sources. It should also require that they assess their suitability for connecting to a nearby renewable heat network, where one is or is likely to be available.
- NPF4 should require that renewable heat network zones identified in Local Heat and Energy Efficiency Strategies (LHEES) are integrated into LDPs.
- NPF4 should include a mechanism for ensuring that LDPs are regularly updated in line with the development and evolution of LHEES.
- NPF4 should direct planning authorities to use planning obligations to require connections to renewable heat networks in suitable new developments located within LHEES heat network zones.³
- NPF4 requirements in relation to renewable heat networks should apply to all scales of development and consequential improvements.

10 Young Scot Co-design Project on NPF4

We are very concerned that the debate around further deployment of renewables, particularly onshore wind, is being dominated by narrow interest groups that are not representative of the wider population. These interest groups are particularly unrepresentative of younger people who will bear the brunt of climate change impacts.

To address this situation, subject to approval, we are planning to work with Young Scot on a collaborative project focussed on NPF4. Young Scot is the national youth information and citizenship charity for 11-26 year olds in Scotland.

This project is intended to ensure young people can input their views into the policy making process to broaden the range of stakeholders influencing the development of NPF4 and the wider debate on climate change, renewable energy and planning in the run up to COP26 in November 2020.

Young Scot will develop and deliver a 8 to 12-month programme to facilitate four 'Spotlight Teams' with a total of 40 young people and take them through our co-design process to develop a deep understanding of trade-offs between renewable energy technology, climate change, biodiversity and visual impacts on the landscape and create radical ideas to influence future decision-making.

Building on Young Scot's extensive expertise in Co-design, this programme will be delivered by their newly evolved empowerment service and will focus delivery on the following priority areas:

- Building shorter-term discovery insights by April 2020 to inform the development of NPF4 including gathering and collating baseline data of young peoples' views/opinions of renewable energy through an online survey hosted on the Young Scot Membership Platform and social media channels
- Establishing and managing a network of four Spotlight Teams of Scottish residents aged 11-26 (with a geographical spread across the urban, suburban and rural areas of Scotland)
- Taking the Spotlight Teams through the Co-design process, to explore evidence, opinion and ideas before compiling a series of recommendations
- Providing opportunities for the Spotlight Teams to collaborate for local/national perspective

³ In a similar way to the London Plan (see sections 5.5 and 5.6)

- Providing opportunities for strategic representation of young people at relevant meetings and events with Scottish Renewables and key stakeholders
- Ensuring the needs and views of young people are integral to the design of future decision making in renewables through planned collaborative co-design activities
- Attendance and/input at key events including The Scottish Renewable Energy Festival in September 2020, the COP26 climate change negotiations in Glasgow in November 2020 and consultation activity for NPF4 (to be scheduled)
- Aligning to other emerging priorities during the programme.

This project will be funded by Scottish Renewables' members but will be run by Young Scot to ensure that the process is transparent and impartial. We would welcome the opportunity to involve the Chief Planner's Office in this project and for members of the Planning Team to have the opportunity to engage with the young people involved.

Scottish Renewables would also like this project to set a precedent within policy making around net-zero, renewable energy and planning for the intergenerational impacts of decision making to be fully considered and for young people to be able to make a meaningful input into future policy making processes at local, national and international levels.