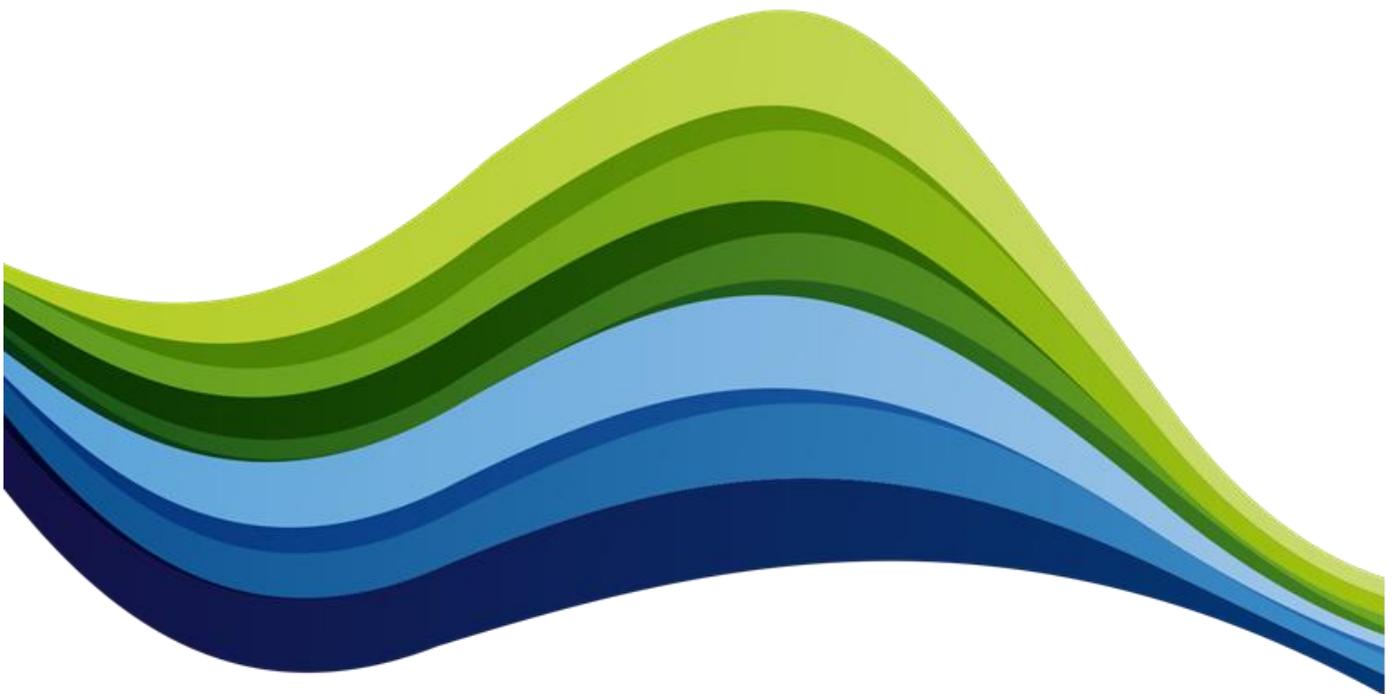




SSE Renewables

Response to NPF4 Call for Ideas

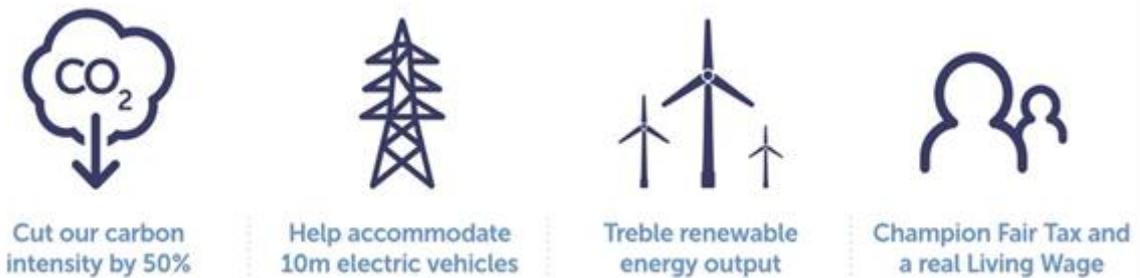
Response to the Scottish Government Call for Ideas for the 4th National Planning
Framework





Introduction

SSE Renewables welcomes the opportunity to contribute our views to the Scottish Government's NPF4 Call for Ideas. At a critical time for the future of the planet and its people, SSE Group's vision is to be a leading energy provider in a low-carbon world and to play a significant role in driving the transition to a low-carbon economy. We have clear Group sustainability objectives which are linked to the UN Sustainable Development Goals and we would fully support these goals being embedded within all aspects of Scottish Government's policy development. Our 2030 SDGs are as follows:



About Us

SSE Renewables is a leading developer and operator of renewable energy across the UK and Ireland, with a portfolio of around 4GW of onshore wind, offshore wind and hydro. Part of the FTSE-listed SSE plc, our strategy is to drive the transition to a zero-carbon future through the world class development, construction and operation of renewable energy assets.

Climate Emergency Consideration

It is our view that the policy objective at the heart of NPF4 should be to support the Scottish Government's ambitious response to climate change and Net Zero. While the emerging Climate Change Plan is important, the critical vehicle for delivery of decarbonisation development objectives over the next vital decade will be a modern planning system, fit for the purpose of tackling the climate emergency. SSE applauds the leadership shown by Scottish Government policy to date on climate response including the setting of highly ambitious targets as encouraged by the CCC, which has stated renewable energy generation must quadruple if targets hope to be met. NPF4 must now underpin those clear national objectives and deliver a bold new planning system that creates a pathway to Net Zero through radical change, moving away from existing restrictive approaches.

A dramatic and inspirational shift in global attitudes to the extent and urgency of action required to combat climate change has emerged over the past 18 months and the Scottish Government has been at the forefront of this movement. In order to maintain a meaningful response, devolved planning policy vehicles like the Scottish Government's NPF4 should now wherever possible remove the obstacles to developments in Scotland that drive forward decarbonisation.

Joined Up Approach

In Scotland, land use planning is the gateway to large infrastructure projects that will contribute to economic growth and decarbonisation. It is vital that an aligned approach to climate change policy is demonstrated by all Scottish Government departments so that clear signals are given to businesses trying to make a difference in this area by progressing renewable energy projects. Energy and climate change objectives should be embedded in NFP4 but also reflected in updated landscape and natural heritage policy with renewable energy gaining priority status. We advocate that NPF4 should be clear in its direction to industry and stakeholders and demonstrate the Scottish Government is approaching its world-leading climate change ambitions with authenticity and true determination.

1. What development will we need to address climate change?

Key Ideas for Consideration

- NPF4 should identify tackling the **current climate emergency** as the principal and overarching policy consideration to which all other policies are subordinate. It should also clearly set out how planning policies and guidance at all levels will facilitate the delivery of Scottish Government energy and climate change policy.
- In order to facilitate the timely delivery of substantial volumes of new low carbon energy infrastructure, including renewable electricity generation, required to meet Net Zero and decarbonisation targets, NPF4 should include a **'presumption in favour'** of development that supports renewable energy targets. For the same reason, and because all forms of renewable energy generation will clearly be a critical component of any national strategy to tackle climate change going forward, we recommend that all renewable energy projects over 50MW, all pumped hydro (including Coire Glas) and the onshore infrastructure required for offshore wind projects are all afforded **'National Development' status**. NPF4 should moreover require Local Planning Authorities (LPA's) to identify land for the development and use of facilities for renewable sources of energy and identify these through subsequent local development plans.
- Linked to the points noted above, NPF4 should clearly signal that the priority of achieving Net Zero will necessarily entail a shift in the balance of planning judgement towards infrastructure necessary to meet Net Zero targets. This will particularly be the case in circumstances where there is tension with other objectives to protect both the built and natural environment. This **"tilted balance"** is crucial if the planning system is to deliver the Government's climate change objectives.
- Tools which currently overly restrict the development of onshore wind energy development, such as the **spatial frameworks** outlined in Table 1 of SPP, should be removed. These overly constrain the decision maker to give weight to matters identified for areas of significant protection, which are already afforded weight in legislation and the development plan, such as national and international designations.
- New policy guidance is required for onshore wind energy development, which moves away from the use of **landscape capacity studies**. These restrict large turbines from landscapes, in terms of both individual landscape character types and in terms of identifying wider strategic capacity. Instead landscape sensitivity studies should be used which do not dictate the size of turbines or place a cap on development.
- **Wild land areas** should be removed as a policy. These areas have stifled wind energy developments and the policy is at odds with the drive to meet the Government's renewable energy targets in a climate emergency. If this is not accepted, at a minimum, wild land areas need to be re-assessed by Scottish Natural Heritage (SNH) and based upon the many wild land assessments undertaken primarily as part of wind farm development proposals. Many of these have been shown not to meet the criteria outlined in paragraph 200 of SPP. A re-assessment of the 2014 SNH map is required to reduce, in both scale and number, wild land areas while still ensuring protection for the wildest areas.
- Under NPF4 onshore wind development should be treated in the same manner as other industries and granted **consent in perpetuity**, or at least for a much greater period such as 100 years to mirror the lease period of electricity substations.
- NPF4 should include a presumption in favour of **repowering and life extensions of renewable developments**, to include larger turbines which accommodate modern technology, particularly where existing grid infrastructure exists.

Commentary

Scotland's commitment to becoming net-zero by 2045 also includes a new target to reduce greenhouse gas emissions by 75% by 2030. These, along with the renewable energy targets which support them beyond 2030, should be embedded in NPF4. The Scottish Government's Climate Change Plan 2018 (due to be laid before parliament in April 2020, but delayed due to the coronavirus pandemic), the 2020 Energy Statement and NPF4 will be crucial opportunities where the Government can display leadership in how the environment, climate, energy and planning portfolios are all working towards the same (net zero) goal, supporting technologies such as solar, pumped storage hydro, and onshore and offshore wind, in addition to battery storage and the repowering of existing projects.

Given the lead time for major infrastructure developments, and in particular offshore wind projects, more support will be needed for renewable energy projects and their associated infrastructure to enable decarbonised electricity to be delivered to homes and businesses. The grid infrastructure required will also be significant and needs to accommodate the decarbonisation of heat and transport networks and the move to electric vehicles in the life of the new plan. All of this will require a new way of looking at energy development and a significant shift in how we do things to meet demand. We should be clear that the status quo will not deliver on these targets. NPF4 needs to deliver both strong support for renewable developments and the associated grid infrastructure.

SSER wholly agrees with the Climate Change Secretary (Speech to Scottish Parliament 14 May 2019) that: *"the next National Planning Framework and review of the Scottish Planning Policy will [should] include considerable focus on how the planning system can support our climate change goals."* and *"...To deliver the transformational change that is required, we need structural changes across the board: to our planning, procurement, and financial policies, processes and assessments"*

To ensure that climate change mitigation is prioritised, significant weight in the planning balance must be attributed to proposals that contribute to Scotland's targets. In order to facilitate the timely delivery of substantial volumes of new low carbon energy infrastructure to meet Net Zero, SSER considers that the NPF4 should include a 'presumption in favour' of renewable energy projects, as well as their repowering and life extensions (e.g. using larger and more efficient turbines, which are required to ensure the economic viability of projects in a subsidy free era or in a competitive Contract for Difference (CfD) process), outside National Parks and National Scenic Areas.

Planning policy must support proposals for long-term use of wind farm sites, as well as the co-location of compatible technologies such as energy storage and solar. Restrictive tools, such as the spatial framework for onshore wind, requires removal from national policy to allow a criteria-based policy approach to development, which considers all factors, but presumes in favour of renewable development. The presumption in favour of meeting renewable energy targets will entail a "tilted balance" towards permitting critical infrastructure. Constraints on development, such as landscape capacity assessments, wild land and carbon rich soils mapping should have lesser (but appropriate) weight in the decision-making process. Furthermore, revision is required to the current, and now outdated, online guidance for renewable energy and the outdated, overly restrictive, SNH guidance "Spatial planning for onshore wind turbines – natural heritage considerations" (2015), if we are to meet the targets.

To date there has been very little evidence of a 'transformative change' in the way that local authorities or government agencies have been determining wind energy proposals since the declaration of the climate emergency. In fact, some recent planning appeal decisions have specifically



referenced an inability to take account of current climate change policy within existing planning policy, as part of the planning balance. Some form of interim policy direction is required from the Scottish Government, perhaps in the form of a Chief Planner's Letter, to redress this policy balance and ensure sufficient weight is attached to the climate emergency until NPF4 itself can direct this balance accordingly. Without a re-dressing of this balance, the climate change targets will not be met. Current policy will push onshore wind developments in particular to areas where there is less wind in order to meet landscape planning policy requirements which do not give sufficient weight to the net zero targets or the climate emergency.

The 5GW built and 3.5GW of consented but unbuilt onshore wind projects demonstrates the difficulties of developing renewable projects in the UK. In the last year, and since the removal of subsidy, only one onshore project has been built. SSER has for the first time in 10 years did not have any onshore wind projects in construction in 2019/20. With subsidy removal many projects were unable to be delivered and the legal challenges to key projects both on and offshore has seen years of delay to key infrastructure projects which has had serious negative knock on effects for the supply chain in the UK.

While offshore wind can play a leading part in the future supply of renewable energy, it has taken 10 years to get to just under 1GW of offshore wind constructed so far in Scotland and there are significant barriers and constraints that need to be overcome to speed up the consenting and development process to realise the benefits of offshore wind. Moreover, while technologies such as floating wind bring hope for unlocking more energy offshore in the future, we are still a number of years away from delivering this at scale.

The Draft Offshore Wind Policy Statement (Dec 2018) aims to set out the Scottish Government's ambitions for the future of offshore wind policy in Scotland. In light of the commitment for net zero by 2045, this needs to be recognised in NPF4 and through subsequent local development plans, even if the policy is not adopted yet. NPF4 should also recognise the Draft Sectoral Marine Plan for Offshore Wind Energy (2019) and the fact that significant onshore infrastructure (in the form of grid connections) will be required to meet Government targets within the lifetime of the plan and by 2030. Due to the size and contribution to decarbonisation of the planned offshore wind developments, they should be considered national developments onshore and we would like to see NPF4 build on the recognition of certain areas as potential energy hubs.

Meeting targets is also constrained by time limited consents. In our view, the environmental impacts of wind farms are not comparable with the majority of mining/quarrying operations where similar provisions are applied, and the cost and delay of reviewing permissions are not appropriate in the current context. Whilst a recent decision extended the normal 25-30 year period to 50 years, NPF4 should give direction that such consents should be given in perpetuity, or at least for a minimum of 100 years, to mirror the 99 year lease period of an electricity substation and to provide greater investor certainty and encourage development.

If Scotland's existing wind farms are decommissioned, then Scotland will lose up to 5GW of existing capacity by 2040, making it much harder to achieve a minimum of 21GW by 2030. There have been cases where existing successful projects would be subject to decommissioning and removal for landscape purposes at the end of their consent period, which is clearly the wrong direction of travel in a climate emergency. It is also the case that NPF4 should include a presumption in favour of repowering and using larger and more efficient turbines.

Focus should be as much on decarbonising the energy system as a whole and also managing the increasing generation required to enable the transition to electric vehicles (EV's). Therefore,



technologies that support the increased deployment of renewable energy, such as pumped storage hydro, will have a critical role to play in decarbonising our electricity generation and responding to the increased need for flexibility and storage. The Scottish Government had already declared its support for expansion of pumped storage hydro provision in NPF3, so it is hoped that this will continue to be reflected in NPF4. SSER's Coire Glas pumped storage project in the Highlands will have an important role to play in terms of providing the flexibility needed to enable more renewable development. It can generate when the wind is not blowing, increasing capacity and making the system more sustainable and effective. This type of project can also build inertia and other stability services to the grid, increasing resilience. It is hoped that known existing projects like Coire Glas and other future projects providing similar services are given National Development Status.

2. How can planning best support our quality of life, health and wellbeing in the future?

Key Ideas for Consideration

- NPF4 should give priority to the development of renewable energy, which will support quality of life, health and wellbeing in the long-term by helping tackle the climate emergency.
- Clear support for renewable energy will also support jobs and investment in Scotland's more remote and rural communities.

Commentary

Giving priority within NPF4 to renewable energy is vital to helping Scotland meet its climate change targets and addressing the climate emergency. This in turn is vital to protecting the quality of life, health and wellbeing of Scotland's population in the long-term.

An NPF that clearly supports renewable energy will also support many rural jobs and investment in remote communities, as the projects tend not to be in towns or cities but where the renewable resources are best. Our community funds invested £6.6m in communities in 2018/19 (read more [here](#)) and recent work on the economic impact of our projects in the Great Glen shows that nearly half a billion in value will be created for the economy in the Highlands over the lifetime of these projects. Many of the jobs created by renewable projects are in these remote locations, servicing the wind and hydro sites where SSER has a long-standing record of employing staff from rural locations. By delivering certainty of development pipeline across different sites and locations, the supply chain can grow in confidence and employ local people to develop projects. When the projects are subject to long delay or have subsidy removed or have grid cost disadvantages then this will impact negatively on companies' ability to resource their teams and deliver projects to meet targets.

3. What does planning need to do to enable development & investment in our economy to benefit everyone?

Key Ideas for Consideration

- Every endeavour should be made to make the planning system as quick and efficient as possible in order to increase investor confidence and the establishment of key supply chain businesses.



Commentary

Certainty and confidence are key to attracting investment and the uncertainty and slow pace of planning and consenting for large infrastructure projects significantly diminishes investor confidence and the confidence to establish key supply chain businesses.

Floating wind does provide an opportunity for Scotland to lead but it will require long term support and a pipeline of projects with reasonable time scales to aid delivery.

The offshore projects offer huge possibilities both in the near term with regards to fixed bottom sites and in the longer-term with regards to technological advances in floating wind, where Scotland could become a world leader if it invests in the technologies, factories and skills to deliver this, firstly on UK waters and then globally.

However, in order to connect these projects planning will have to support both the infrastructure at ports and harbours, which are often some of the smaller communities in the country, plus the grid infrastructure onshore and around the coast. Positive planning support for these hubs will be needed and will give investor confidence to this key area of development.

4. How can planning improve, protect and strengthen the special character of our places?

Key Ideas for Consideration

- The existing national parks and statutory environmental designations provide sufficient protection to areas of special character. As stated above we believe that current restrictions such as landscape capacity studies and wild land areas should be removed or modified and the **tilted balance** principle applied for all renewable energy development that will help meet government climate change targets.
- With specific regards to **peatland**, while we recognise the 2019 Town and Country Planning Act suggests that NPF4 must have regard to certain issues, it only requires a “desirability of preserving peatland”. This should carry less weight in NPF4 than renewable energy proposals and should not hinder its development.

Commentary

SSER agrees national parks and national scenic areas should be protected from the impacts arising from wind turbines. However, there must be a reconsideration of the restrictions placed on wind farm locations from the proliferating number of areas, which are subject to local designations. Such restrictions will severely constrain meeting climate change targets. There are of course valid concerns regarding the siting of wind farms, but we are not convinced that some of the existing studies relating to landscape capacity, wild land and carbon rich soils provide the basis upon which to refuse permissions. In our view, the climate emergency demands that very significant harm be demonstrated in order to prevent development that is needed to meet targets.

SSER has developed many onshore wind projects which have helped to decarbonise Scotland’s energy system and have carried out compensation measures and habitat management over large areas of the country. Many on the windiest sites are located in areas where peat is present. These upland peat areas are often used for commercial purposes such as country sports and commercial forestry.



SSER has a strong track record in these types of environments having successfully developed renewable energy projects for decades in such locations, often with substantial mitigation efforts to help improve what are very often degraded habitats and as a result deliver biodiversity net gain.

In recent years, approximately 250ha of peatland restoration has been completed across eight operational SSER wind farm sites with approximately 1,500ha of future Habitat Management Plan (HMP) peatland restoration works linked to HMPs of operational, consented and development sites. As well as these direct activities, SSER has reduced grazing pressure through compensation agreements with many landowners across our sites, all of which help to improve and protect peatland areas throughout the life of a project.

We fully support the climate change benefit from preserving and restoring sensitive peatland areas. However, it is vital that the planning system does not prevent renewable energy developments on peatland where the resultant development will have a short carbon payback period, where other mitigation can be put in place through HMPs and where development can improve degraded peatland under existing good practice guidance.

5. What infrastructure do we need to plan and build to realise our long term aspirations?

Key Ideas for Consideration

- Renewable developments above 50MW, all pumped hydro developments and the onshore infrastructure associated with offshore wind projects including onshore cabling and substations should be given '**national development status**' in NPF4.
- Hydrogen, carbon capture utilisation and storage (CCUS), battery storage and all new renewable technology.

Commentary

The move to a net zero carbon society will require significant new investment in Scotland's energy infrastructure, beyond the renewable energy generation assets themselves. Future infrastructure will include pumped storage at a large scale to act as a battery for renewable projects and help manage the grid as the level of renewable energy on the system continues to increase. Large new grid connections and infrastructure, such as substations, will be required to deal with the new way of running the grid and to get the offshore generation on shore and getting it quickly to the areas with the highest demand. New interconnectors will be needed to send power across the continent and to our neighbours so that we can maximise the efficiencies of renewables. As already stated, new harbours and operations bases will be required for the offshore generators as well as battery and solar farms close to grid connections.

We can better use the existing infrastructure by consenting repowered and new development in perpetuity, or at least for longer, removing the need to renew it every 25 years. This has already been demonstrated through the Scottish Minister's granting of Section 36 Consent under the electricity act for the Tangy IV wind farm in Argyll & Bute in December 2019 for a period of 50 years. We can also follow the existing planning guidance and establish locations with consented sites as suitable for future development, such as extensions to sub stations and wind farms.

As stated under question1, because all forms of renewable energy generation will clearly be a critical component of any national strategy to tackle climate change going forward, we recommend that all renewable energy projects over 50MW, all pumped hydro (including Coire Glas) and the onshore



infrastructure required for offshore wind projects are all afforded '**National Development**' status. NPF4 should moreover require Local Planning Authorities (LPAs) to identify land for the development and use of facilities for renewable sources of energy and continue to ringfence these through subsequent local development plans.