

Response to the fourth National Planning Framework (NPF4) Interim Position Statement consultation

19 February 2021

About Energy UK

Energy UK is the trade association for the UK energy industry. We represent the diverse nature of Scotland's energy industry with our members delivering the majority of both Scotland's power generation and the energy supply for 2.5 million Scottish homes and businesses. The Scottish energy industry delivers around £8.4bn in economic activity through its supply chain and interaction with other sectors, and supports over 46,000 jobs directly and indirectly in every corner of the country.

Energy UK welcomes the opportunity to respond to this consultation and notes its [response](#) to the fourth National Planning Framework (NPF4) Call for Ideas in April 2020. In this response we encouraged a bridging measure being put in place to ensure the Climate Emergency and Net Zero targets are taken into account in planning decisions and supported consideration of any options to achieve this in order to provide a much-needed steer for the way in which planners and reporters should be treating applications in the interim period before NPF4 is implemented in spring 2022.

We welcome many of the policy proposals set out in the NPF4 Position Statement, however we would still encourage Scottish Government to take steps to expedite some of these proposals and avoid unnecessary delay to their active contribution towards the Net Zero transition.

Please find our responses to the relevant consultation questions below.

Response to consultation questions

1. Do you agree with our current thinking on planning for net-zero emissions?

Energy UK is pleased to see that the interim NPF4 Position Statement sets out the Scottish Government's clear intent to implement positive policy proposals to support deployment of a low-carbon energy system. We strongly support many of these and would like to see them applied before the NPF4 is implemented in spring 2022 so that they can start making a valuable contribution towards Scotland's ambitious 2045 Net Zero target. In particular, we would welcome consideration of whether certain proposals can be expedited ahead of the final NPF4 due in spring 2022.

Firstly, the Statement's policy proposals to make the climate emergency a material consideration in planning is warmly welcomed and reflects both the urgency of the climate emergency and the need to embed climate change mitigation at the heart of planning decision making. We would ask that serious consideration is given to expediting this proposal ahead of the publication of the draft NPF4 in Autumn 2021 and the final NPF4 in 2022. In particular, greater weight should be attached to the role of renewable generation development and associated infrastructure including networks, storage and conventional generation, which will help not only tackle the climate emergency but also ensure security of supply in the transition to Net Zero. In this respect, we also welcome the Statement's assurance to future-proof NPF4 as far as possible through "introducing new policies that address a wider range of energy generation technologies for example for electrical and thermal storage, and hydrogen".

Secondly, we strongly support the Statement's proposal to "strengthen support for repowering and expansion of existing wind farms". We therefore ask that this proposal is realised through the introduction of an immediate presumption in favour of repowering and life extension of existing onshore

windfarms with supporting guidance on how it should be applied. Without clear policy support, large quantities of renewable capacity could be lost or decommissioned, resulting in a backsliding of progress towards meeting Net Zero. Scotland could be particularly impacted with 5GW scheduled to be decommissioned by 2040, representing two thirds of the 8.4GW of current onshore wind installed capacity. It is evident that with the appropriate framework, a clear pipeline of repowering projects could be secured, bringing substantial investment to Scotland and growing the domestic supply chain. As such, benefits would be secured for the economy and local communities. Alongside this presumption, we ask that planning policy supports the rollout of taller, modern turbines to increase generating capacity through the upgrading of existing onshore wind sites.

Aside from the consideration of accelerating the above policy proposals, we would also ask for clarity that the explicit support for repowering and life extensions for onshore wind energy developments does not preclude the possibility of new onshore developments on greenfield sites. On the path to reach net zero by 2045, industry needs a clear policy approach on repowering and life extension *as well as* policies that support new development, not one or the other, to deliver the necessary renewable capacity in the near and longer-term.

Finally, in response to this question we would like to highlight the need not just for more renewable energy generation projects but also the need for infrastructure projects that support the electricity grid as it continues to decarbonise and function with an ever-increasing share of non-synchronous renewable power sources. As the Climate Change Committee stated in its 2020 progress report to the Scottish Parliament, "The challenge for the next decade is to accelerate the decarbonisation of other sectors of the economy, much of it via electrification and to increase flexibility in the power system to help meet the challenge of operating a system using large amounts of energy from renewables". In this respect, the role of flexible generation technologies such as pumped storage hydro should be noted. Pumped storage hydro is a tried and tested technology providing long duration storage and a host of ancillary services that offers significant benefits to the electricity transmission system.

We notice the potential for policy change regarding 'making it more difficult for new developments that generate significant emissions, across the lifecycle of a development as a whole, to gain planning permission'. While we understand the principle of this suggested approach, we would like to better understand the practical implications for different projects, particularly how emissions will be calculated and how such as consideration will be integrated in the planning system. Ultimately, such a requirement needs to be consistent with policy objectives as set out in the Climate Change Plan as well as the Energy Strategy and other relevant policy documents.

Furthermore, factoring in the intermittency of renewables generation combined with the timeline for emerging technologies to mature, the existence of a diverse energy mix in the interim is essential as part of the transition to Net Zero. Emission limits associated with conventional gas generation as well as biomass are already fully regulated by environmental legislation and the introduction of planning policy barriers prematurely could lead to unwanted consequences, such as becoming a barrier to environmentally-beneficial efficiency improvements.

2. Do you agree with our current thinking on planning for resilient communities?

We welcome the commitment to remove the need for planning permission for electric vehicle charging points. Looking at the charging network, it will be important to provide a comprehensive network of public, domestic and non-domestic charging infrastructure. Workplaces need to have the infrastructure available to offer charging facilities to their employees, particularly in light of the vast array of research that suggests charging will take place mainly at home or in the workplace

3. Do you agree with our current thinking on planning for a wellbeing economy?

While we recognise that the purpose of the position statement is to provide high-level proposals for NPF4, we are keen to flag potential inconsistencies between ambitions for renewable energy deployment and the protection of peatlands across different chapters within the statement. Protection

of peatlands and the development of onshore windfarms are not mutually exclusive. Our members value peatlands and have experience of developing wind farms on peatlands in a respectful way that often also involves peat restoration works. The statement itself advocates leveraging in private investment for peatland restoration which our members who own wind assets in Scotland already have experience of thus highlighting that the two uses are not incompatible. There needs to be serious consideration of these conflicting messages when the detail of the final NPF4 is drafted so that industry has a clear policy approach to follow. With a clear policy framework, and equally strong leadership from Scottish Government, industry will have the confidence to invest in these projects.

4. Do you agree with our current thinking on planning for better, greener places?

Energy UK welcomes the proposed update to the current spatial framework for onshore wind which will continue to protect National Parks and National Scenic Areas whilst allowing development outwith these areas where they are “demonstrated to be acceptable on the basis of site-specific assessments”. Given our concerns around the currently restrictive SPP policies coupled with cautious decision-making, Energy UK would support Scottish Government reconsidering the approach to Wild Lands selected zones to unlock low-carbon energy developments, and also to encourage other initiatives in these areas.

In a similar vein, we note the Statement’s support for prioritisation of brownfield over greenfield development in particular with a view to use this land for renewable energy and green infrastructure. Although a sensible approach in principle, it is worth managing expectations around the volume of brownfield/vacant and derelict land that is potentially appropriate for renewable energy development. Energy UK members represented on the Vacant and Derelict Land Task Force have considered the registry of vacant and derelict land and found that there was not much in the way of land suitable for the development of onshore wind farms, solar farms or battery storage projects at scale due to specific requirements, e.g., proximity to a viable grid connection, separation distances from residential properties, etc. The same applies to emerging clean technologies that may have similar requirements, such as blue or green hydrogen.

That is not to say that there will be no development opportunities for low carbon energy infrastructure on these vacant and derelict sites, but it will not be appropriate in all cases and certainly should not be relied upon to deliver projects at the scale required to tackle the climate emergency. It is also important to ensure that the policy intention to prioritise Brownfield sites will not hinder the potential for consenting extensions on any Greenfield areas adjacent to existing operational sites; this is particularly important for the future of hydrogen technologies which may be installed within or next to existing wind or conventional generation sites. Ultimately, the policy approach in NPF4 will also need to remain supportive of new developments on greenfield sites.

We are pleased to see that the NPF4 Position Statement refers to securing positive outcomes for biodiversity from new developments without the need for overly complex metrics. We are currently grappling with a very complicated Biodiversity Net Gain metric approach in England which has the potential to significantly hinder the growth of low carbon energy for a negligible environmental benefit. As such we would strongly support Scottish Government avoiding this approach and taking a different route, in collaboration with industry, to achieving environmental benefit without an unnecessarily burdensome and prescriptive metric. We look forward to more detail on how Scotland intends to support wider approaches to natural infrastructure, including the work already started by Nature Scot, and stand ready to constructively feed in to those discussions.

Energy UK also welcomes the Statement’s recognition of development required to realise the potential of the blue economy and support coastal communities. The growth of offshore wind presents significant opportunities for the prosperity of coastal communities and is predominantly enabled through effective marine planning. However, offshore wind development equally relies on the terrestrial planning system to deliver the necessary onshore infrastructure such as onshore grid connections, substations, upgrades to ports and harbour facilities. It is critical that this interaction between marine and terrestrial

planning is reflected in NPF4 to ensure that both systems are aligned and the expansion of offshore wind is adequately supported by well-planned, strategic grid infrastructure onshore.

5. Do you have further suggestions on how we can deliver our strategy?

In the NPF4 Position Statement, there is the reassurance that NPF4 will help to deliver Scottish Government's wider energy ambitions, including the Scottish Energy Strategy. Given that several of these other documents will be updated every few years, whereas the lifetime of NPF4 is 10 years, it will be important to ensure that there are opportunities to update NPF4 so that it remains consistently reflective of advancements in technology.

Although not explicitly referred to in the NPF4 Position Statement, a well-functioning and well-resourced planning system is key to delivering the necessary projects and supporting infrastructure to meet Net Zero. We welcome the intention within the Climate Change Plan to review energy consenting processes and identifying efficiencies to improve determination timescales for electricity generation projects. We would urge that this is progressed immediately to ensure timely determinations of renewable energy projects to support the transition to Net Zero. We would also suggest that the scope includes consideration of local authority and statutory consultee resourcing to ensure these bodies are equipped to play their role in the swift transition to Net Zero.

6. Do you have any comments on the Integrated Impact Assessment Update Report, published alongside this position statement?

No comments.

7. Do you have any other comments on the content of the Position Statement?

No comments.

For further information, please contact:

India Redrup

Policy Manager, Power

Energy UK

26 Finsbury Square

London, EC2A 1DS

Tel: +44 20 7024 7635

india.redrup@energy-uk.org.uk