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Planning Architecture and Regeneration Division (PARD)
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21 May 2024

To Whom It May Concern,

Response to Masterplan Consent Areas consultation on draft regulations (Released February 28, 2024)

Scottish Renewables (SR) is the voice of Scotland's renewable energy industry. Our vision is for Scotland to lead the world in renewable energy. We work to grow Scotland's renewable energy sector and sustain its position at the forefront of the global clean energy industry. We represent 360 organisations that deliver investment, jobs, social benefit and reduce the carbon emissions which cause climate change.

Our members work across all renewable technologies, in Scotland, the UK, Europe, and around the world, ranging from energy suppliers, operators, and manufacturers, to small developers, installers, and community groups, as well as companies throughout the supply chain. In representing them, we aim to lead and inform the debate on how the growth of renewable energy can provide solutions to help sustainability heat and power Scotland's homes and businesses.

SR welcomes the opportunity to provide the views of our members to the Scottish Government's draft regulations set out in the consultation that seek to provide guidance for planning authorities in creating Masterplan Consent Areas (MCAs).

Our members are supportive of the Scottish Government's proposal and approach, and of MCAs being developed by planning authorities, with guidance from the Scottish Government. We agree that there is value in limiting restrictions on what planning authorities can do with MCAs to encourage creativity in achieving local and national goals.

MCAs could be an important tool in helping Scotland build the infrastructure needed to reach its net zero ambition. We see MCAs as a way to support ports, the supply chain, and Operation and Maintenance (O&M) facilities serving renewable energy developments. Because our legally binding national 2045 target, and the annual interim targets, are so

ambitious, it is important to have mechanisms that shorten planning process timeframes to put the needed infrastructure in place to achieve them. It is also important to provide local communities with mechanisms to capitalise on the economic development and benefits that will come alongside renewable energy developments. The fact that the Scottish Ministers have indicated that the target to reduce emissions by 75% from baseline levels is not achievable means that it is all the more vital to strive to meet later interim targets.

To ensure the effectiveness of MCAs, there must be synergy between national net zero and biodiversity targets and the locally focused content of MCAs. The Scottish Government has an important role to play in the development of MCAs by supporting planning authorities to combine national priorities with their local expertise.

- Scottish Ministers should be alerted as MCA schemes are being developed to ensure that MCAs help Scotland achieve national ambitions, goals, and targets. MCAs should not be used in such a way that would limit our ability to achieve net zero or restrict renewable energy project developments.
- Scottish Government guidance should ensure that MCAs function only as an incentive to develop in MCA-designated areas and do not prohibit or exclude development elsewhere. Guidance should make it clear that MCAs should be in accordance with the provisions of the development plan, including NPF4. They should take into account existing development and proposals within and adjacent to the MCA.
- The Scottish Government should provide best practice guidance on what kinds of development planning authorities could consider and the benefits of MCAs for those kinds of developments.
- The Scottish Government should provide best practice guidance on engaging communities and developers early in the MCA development process. This will ensure that MCAs can effectively be used by developers to create the kinds of developments communities are looking for.
- Scottish Government guidance should also address the issues of deliverability, viability, and feasibility to avoid commercially unattractive MCA proposals from sterilising other development within the MCA or surrounding areas.
- Clarity is needed on how MCAs will work with other schemes, such as green ports or simplified planning zones. It's also important that MCAs add to existing infrastructure and schemes without interfering with them. MCAs should not override any existing powers local entities have, such as port trusts.

We would encourage the Scottish Government to provide guidance for planning authorities on how all schemes could work together. This would allow planning authorities to approach various schemes and incentives holistically and strategically.

In addition, the implementation of MCAs may assist several National Developments defined in NPF4 to proceed by streamlining the planning processes. These National Developments include Strategic Renewable Energy Generation and Transmission Infrastructure.

We are conscious of the existing resource strains on planning authorities and encourage regulations around implementing MCAs to impose as few additional burdens on planning authorities as possible. MCAs should not be mandatory for communities that do not have a use for them. The process for how MCAs are implemented should mirror existing processes so planning authorities do not have to create or implement new consultation processes.

Scottish Renewables looks forward to working with you to ensure that MCAs meet the needs of our communities and our nation.

Sincerely,

A handwritten signature in black ink, appearing to read 'Megan Amundson', with a stylized flourish at the end.

Megan Amundson
Head of Onshore Wind & Consenting
Scottish Renewables