Email: **nationalparkreporter@nature.scot**

Peter Rawcliffe

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XX February 2025

Dear Peter,

**Response to** **Consultation paper – Proposed National Park in Galloway (Released November 7, 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 over 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 sustainably heat and power Scotland’s homes and businesses.

SR appreciates the opportunity to provide feedback on the proposed National Park in Galloway. On behalf of our members, SR recommends against a National Park designation in Galloway, and instead suggests increased investment in existing designations to achieve the same goals.

[Feedback requested for details about how the biosphere could be better governed/managed/utilised to achieve the goals laid out in this consultation]

A National Park designation would create a barrier to consenting renewable energy projects. While this consultation references onshore wind specifically, due to existing NPF4 policy that specifically references onshore wind, a National Park designation would become a barrier to deployment of all renewable energy technologies, battery storage, and transmission at a time when the Scottish and UK Governments are both investing significantly in speeding up the planning process to meet net-zero targets.

The UK Government’s [Clean Power 2030 Action Plan](https://www.gov.uk/government/publications/clean-power-2030-action-plan), released by DESNZ on December, 13, 2024, specifically lays out the case for speeding up the planning process for renewable technologies and outlines the capacity expected to be built by 2030 and 2035 by technology and by region. Southern Scotland is expected to supply 8.8GW of onshore wind by 2030, 800 MW of solar by 2035, and 3.9GW of battery storage by 2030. None of this expected capacity can be achieved with a National Park designation, which allows a planning authority to prioritise natural heritage over net-zero targets.

The National Energy System Operator’s (NESO’s) [Strategic Spatial Energy Plan (SSEP)](https://www.neso.energy/what-we-do/strategic-planning/strategic-spatial-energy-planning-ssep) draft methodology, released December 9, 2024, lays out how the UK will coordinate system design and planning efforts across the whole energy system to achieve net-zero by 2050. While this plan will not be completed until 2026, in the interim, it is imperative that the Scottish Government does not put designations in place that would create barriers to deployment within the planning system of any technologies critical to achieving carbon neutrality. As referenced in the SSEP, these essential technologies are solar; onshore and offshore wind; nuclear; hydrogen for power, storage, and transportation; storage including pumped storage hydro, batteries, and compressed air; bioenergy, carbon capture and storage; gas-fired power plants; and interconnectors.

The Centralised Strategic Network Plan (CSNP), which is expected to be released by NESO in 2027 once the SSEP is finalised, will outline where grid network capacity must be built to achieve net-zero. Any National Park designation created in advance of these spatial plans being released by the UK Government could impede our ability to achieve net-zero.

**The National Park Designation as a Barrier to Renewable Energy Deployment**

The Dumfries and Galloway Council area has extensive wind resource. This is reflected in the Onshore Wind Pipeline Analysis, done twice annually as a commitment of the Scottish Onshore Wind Sector Deal and most recently [updated in December 2024](https://www.scottishrenewables.com/publications/1805-scotland-2030-pipeline-analysis-december-2024), where 94 S36 projects and 30 Town and Country Planning projects are identified as being in development. Within the originally proposed National Park boundary, there is a total of 1.3GW of pre-construction projects in the pipeline at risk with a National Park designation. That is significant onshore wind capacity to jeopardise with a National Park designation as the Scottish and UK Governments attempt to achieve net-zero targets. That also does not address the capacity potentially lost from solar or battery storage, which would also be jeopardised with a National Park designation, or the impacts on net-zero targets by missing grid connection dates should grid reform not be achieved in the required timeline.

Under NPF4, new onshore wind is not permitted to be developed in a National Park. However, the New National Parks Appraisal Framework Guidance for Nominations states:

*‘All areas of Scotland are eligible to submit nominations to become a new National Park (including those that have current or potential onshore wind developments). To ensure any National Park addresses the climate emergency and supports progressive development, we will develop new bespoke planning policy on onshore wind to be applied in new National Parks. This means that a new National Park will be treated differently to existing National Parks with respect to NPF4 policy for onshore wind’.*

In response to a request for more information about when this will happen and what that process will look like, Kathryn Hossack, Senior Planner at Planning, Architecture and Regeneration Division shared in a letter to SR on August 28, 2024 that a ‘bespoke’ policy cannot be created until regulations for amending NPF4 are in place. ‘Once the regulations are in place, we will provide further information on the work required to develop bespoke policy applicable to onshore wind in a new National Park, including a proposed timeline’.

The delayed process for determining how onshore wind will be treated within the planning process does not provide us with sufficient information or confidence in a planning process that will ensure that onshore wind will be consented within a new National Park and that determination timelines will be shortened, as promised in the Scottish Onshore Wind Sector Deal.

Even if NPF4 were to be amended to allow unfettered consenting of onshore wind, a National Park designation inherently prioritises natural heritage over other land uses. As the consultation paper lays out:

*‘The National Parks (Scotland) Act 2000 establishes the four aims of all National Parks which allows for them to deliver for both people and nature:*

* *to conserve and enhance the natural and cultural heritage of the area*
* *to promote sustainable use of natural resources of the area*
* *to promote understanding and enjoyment (including enjoyment in the form of recreation) of the special qualities of the area by the public*
* *to promote sustainable economic and social development of the area’s communities.*

*‘…if there appears to the National Park Authority to be conflict between the first aim and any of others, the Act requires it to give greater weight in its decision-making to the first aim (of protecting the natural and cultural heritage of the area) in the long-term’.*

This could impact the consenting of any renewable technology or transmission should there be a conflict.

In addition, this consultation states ‘National Park status may also open up opportunities for funding the re-routing, redesign or undergrounding of existing and new grid infrastructure’. The UK Government is planning an extensive update and expansion of grid infrastructure to accommodate increased renewable energy development across the UK and particularly in Scotland. Given the current work to create spatial plans for grid infrastructure (the SSEP and CSNP) and the [UK Government’s statements](https://www.independent.co.uk/news/uk/keir-starmer-labour-party-east-anglia-government-national-grid-b2620908.html) that undergrounding grid infrastructure is too expensive to be practical, efforts to create a designation that would require such extraordinary measures do not align with current strategies for grid reform and have the potential to prevent the infrastructure extensions required to reach net-zero.

Even during this period of research and consultation, the regulatory uncertainty and questions around grid connection dates in the proposed area for this National Park can impact projects currently in development. In recent months, several wind farms in Scotland have not reached final investment decision due to exactly this kind of uncertainty. We have heard from the onshore wind industry that members are re-evaluating their development pipeline in light of investor concern. Scotland cannot reach 2030 ambitions for onshore wind or meet the expectation of the Clean Power 2030 Plan for wind, solar, or battery storage if the uncertainty of this designation halts projects currently in the planning system.

Whether a proposed Galloway National Park would be a planning authority or statutory consultee working with existing overlaid planning authorities, a National Park will create additional bureaucracy within the planning system for any renewable energy project proposed within the boundary. Dumfries and Galloway is already under resourced and lacks technical expertise to evaluate renewable energy proposals in a timely manner. [Feedback requested: any case studies on how long it is taking D&G to respond to proposals as statutory consultees, or any delays within T&CP from them] Adding any further planning complexity, or any additional planning consultees in response to the governance of a National Park, will slow down or potentially stop renewable energy planning consents altogether.

**Using Existing Designations to Meet Scottish Government Goals**

SR recommends either investing in the Galloway and Southern Ayrshire Biosphere Reserve to achieve the goals this proposed National Park seeks to achieve.

The stated goals of a National Park—contributing to the economy and tackling the climate emergency—could be better achieved by shortening determination timelines for renewable energy projects in the area. In fact, a National Park designation could become a barrier to achieving these goals.

The financial benefits of a National Park are a fraction of the benefits that the local area would see with additional renewable energy and transmission developments. [Feedback requested: case studies of the local benefit for any existing onshore wind developments in the area] Adding a National Park designation in the region would stunt economic growth rather than grow it, should renewable energy and transmission projects be rejected because of it.

The benefits to nature of a National Park designation, as stated in this consultation, ignore the significant nature protection renewable energy and transmission projects provide, with no additional designation required. All renewable energy projects require habitat management plans. [Feedback requested: case studies on the total area and the proportion of nature restoration/protection for onshore wind farms that exist in the area] Government cannot afford the level of nature protection and restoration renewable developers provide with their projects.

In addition to the significant area currently covered by habitat management plans for existing onshore wind farms, SR and our members are working with NatureScot to reach Scotland’s 30 by 30 goal by piloting Other Effective Area-based Conservation Measures (OECMs) on onshore wind farm sites. This collaborative effort from industry to support Scotland’s nature conservation would be hampered by a National Park designation, whose designated area may not be counted toward Scotland’s 30 by 30 goal as the current National Parks are not included in the 30 by 30 baseline in their entirety. Renewable developers provide a significantly more cost effective pathway to 30 by 30. Should projects in the pipeline not be built, or not be built in time, the opportunity will be wasted.

Scottish Renewables appreciates the efforts NatureScot has made to engage with us and our members in this conversation, and we look forward to working together to find alternative ways to achieve our shared economic, climate, and nature goals.

Sincerely,



Megan Amundson

**Head of Onshore Wind & Consenting**

**Scottish Renewables**