

Local Government, Housing and Planning Committee
Scottish Parliament
Edinburgh
EH99 1SP

07 March 2025

To Whom It May Concern:

Response to NPF4 Year 2 Review Consultation

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.

Thank you for the opportunity to provide feedback on how NPF4 is working.

NPF4 is working well on the whole. There is an expected settling down process that is underway and going well to date.

Our concerns regarding NPF4 focus on implementation. Not all local planning authorities or statutory consultees are interpreting NPF4 as a whole. Some are requiring compliance with every individual policy or are inconsistently applying NPF4 to planning proposals.

We also have concerns about the impact of S24 of the 1997 Act which provides that, in the event of any incompatibility between plans covering the same area, the newest plan has precedence. The National Planning Framework reflects national priorities and vision, and it should always have primacy over local development plans (LDPs) on policies affecting national issues such as energy. LDPs should retain precedence for purely local issues. We foresee future conflict between NPF4 and some local development plans that will dilute and frustrate the clear intentions of the Scottish Parliament, which approved NPF4.

An example of this conflict can be seen in the evidence report released for consultation by the Highland Council on February 6. The intent of NPF4 Policy 11 is to 'encourage, promote and facilitate all forms of renewable energy development onshore and offshore'. However, language used in the Highland Council evidence report for meeting energy needs focuses on 'tailoring' NPF4 to meet local priorities, as well as 'assessing' and 'managing' cumulative effects (see Highland Local Development Plan - Evidence Consultation section 4.3.2). This includes mapping constraints, including 'constraints that are included in the spatial framework and others that are not (such as Special Landscape Areas)'. This evidence report is setting the foundation for limiting renewable energy development in the basic language it is using, which does not reflect an intent to encourage or promote renewable energy development, as well as creating constraints that do not reflect national policy for renewable energy development in NPF4.

It is worth noting that Scottish Government has promised a 'bespoke' planning policy for onshore wind in National Parks to replace NPF4 Policy 11b. We look forward to working with Scottish Government on that policy to create one that better addresses the twin goals of address the nature crisis and climate change.

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**