



# **National Planning Framework 4**

Solar Energy Scotland briefing

Solar Energy Scotland believes the final version of National Planning Framework 4 (NPF4) needs to be substantially enhanced to remove barriers to solar development across Scotland.

NPF4 is the first to be produced under the 2019 Planning (Scotland) Act, and incorporates the previously separate Scottish Planning Policy. It is likely to be current well into the second half of this decade, so the policy on planning and development it embodies must be consistent with the Scottish Government's 2030 decarbonisation targets and advice governments have received from the UK Committee on Climate Change.

Solar Energy Scotland expects those targets to include ambition for 4–6GW of installed solar capacity across Scotland by 2030, with all the accompanying economic, cost of living, employment and climate benefits that will bring.

### **Strategic priorities for enhancement**

At a strategic level, the NPF4 draft sets four ambitions for placemaking across Scotland, all of which Scotland's solar industry supports: **sustainable places, liveable places, productive places, and distinctive places**. The first of these sets out an intention to "diversify and expand renewable energy generation", which is a welcome step forward from the language in NPF3. Climate mitigation via renewables should feature throughout these four ambitions, though, and not just adaptation.

Solar Energy Scotland believes a more positive strategic position needs reinforcement in two specific ways.

First, **higher priority for climate mitigation at a strategic level**: Significantly elevated weight should be afforded to renewable development in the planning balance. Solar Energy Scotland believes that Spatial Principle (f) should also make explicit the need for planners to prioritise all renewable developments, as well as the grid and storage capacity required to secure maximum benefit from such projects.

Second, greater coordination with adjacent policy areas, including clarification on how solar and other renewable proposals will help deliver Scottish Government objectives on housing, heat, power, land use, and transport, as well as decarbonisation.

## **Modifications required**

Policy 19, the element of most direct interest for renewable projects and decarbonisation, is internally contradictory. Sections A and B are consistent with the strong and positive language on renewables in the Sustainable Places section, but then subsequent sections systematically undermine those aims.

This is especially true of section K, which sets out 17 negative tests for each development to be assessed against. Many of those tests are simply the expression of good practice, or even legal compliance, and are already followed by developers. Unless this text is significantly reworked, it is likely to prove an obstacle to even the most uncontroversial renewable projects.

1. The universal requirement on developers to produce "glint and glare" studies in section J should be removed, given how rarely there is any issue of this sort. Any such requirement should be proportional to the specific design of the proposed solar panels and to the site context.
2. The extensive nature of the list in section K, with many value judgement elements, should be stripped back. Other more controversial development categories have been assigned fewer hurdles. This list simply gives decision-makers more opportunities to make arbitrary decisions incompatible with urgent action in a climate emergency.
3. On solar, the section K list specifically states "Ground mounted arrays should be installed using pile driven or screw foundations rather than trench foundations to facilitate restoration of the site". This is an inappropriate level of detail unseen in other sections of this document, and should be removed. These stipulations belong in best practice guidance and site specific conditions, not set in overarching national policy.
4. Include explicit support for solar developments in green belts as a low impact, biodiversity-friendly technology.
5. In Policy 8, there should be clarification that solar capacity will be measured on its AC capacity to be consistent with the way other technologies are treated.

### **Associated policy-level changes required**

- Permitted development rights should be extended to all rooftop solar projects, either without a capacity limit, or at least for projects at 5MW or below (such installations would still be subject to other planning rules).
- Building regulations should include an affordability target for new homes and recognise the role of exported solar energy in environmental performance: this will help ensure new homes are cheaper to run and support a just transition to electric heating systems.
- The requirement for solar installations to hold a building warrant should be removed if a certified chartered engineer's structural certificate (SER) is obtained.
- End the practice of removing agricultural support payments for dual-use land, such as land used for solar generation alongside sheep grazing or biodiversity and conservation measures.







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