

NATIONAL PLANNING FRAMEWORK 4 CALL FOR IDEAS
THE BANKS GROUP RESPONSE – APRIL 2020
GRP/047

1 INTRODUCTION

- 1.1 Banks Renewables is part of the Banks Group, one of the UK's leading private development companies with over 40 years' experience. The Group operates across surface mining, renewable energy and new energy generation and property development.
- 1.2 We welcome the opportunity to contribute our ideas for NPF4 and look forward to the opportunity to engage in the formal consultation process in Autumn.

2 WHAT DEVELOPMENT WILL WE NEED TO ADDRESS CLIMATE CHANGE?

- 2.1 Scotland's climate change legislation sets a target date for net-zero emissions of all greenhouse gases by 2045. It is imperative that NPF4 underpins a planning system which enables Scotland to achieve this ambition. NPF4 must continue to recognise the importance of, and encourage the development of, renewable energy generation and other technologies that support flexibility in the grid and, to that end, we would like to put forward the following ideas for consideration.

Planning Framework

- 2.2 NPF4 should not spatially plan for wind farms through the application of constraint-based mapping within Local Development Plans. This approach often excludes technical requirements of wind farms such as wind speeds and grid connections and can result in the most viable sites being overlooked. Decisions should be made on a case-by-case basis, considering the planning balance.
- 2.3 NPF4 should also avoid spatially planning for wind farms through landscape capacity studies, which more often than not determine that there is no capacity for large turbines and become quickly out of date, with turbine technology outpacing guidance updates. It should be left to site and proposal specific assessments of landscape and visual effects to demonstrate the suitability of sites. We would support the use of Landscape Sensitivity Studies that provide high level information and can be used to inform the baseline of site-specific landscape assessments. However, these must not become a tool for assessing wind farm applications.
- 2.4 NPF4 should fully address the scope of Wild Land Areas (WLAs). WLAs to date have effectively been treated as designations, resulting in the unnecessary sterilisation of substantial areas of the Highlands for onshore wind farms. NPF4 must ensure that appropriate weight is given to WLAs as a mapped interest, thus weighed as a subjective matter in the planning balance rather than treated as a designated site. It must also ensure that buffer zones are not established around WLAs, stifling development in areas that have lower "wildness" qualities than the designation is seeking to protect.

- 2.5 The economics of onshore wind have changed substantially over the years and turbine technology continues to change and evolve. As NPF4 will have a 10-year life span, it is crucial that it encourages / has the flexibility to consider the latest technologies with increased rotor diameter and hub height. Arbitrary height restrictions that stifle new technology must not be imposed. This will ensure that sites can maximise their productivity and ultimately ensure that net-zero can be delivered at the lowest cost.
- 2.6 We believe that there needs to be more balance in the planning system. There is currently too much weight placed upon environmental protection within the system and not enough weight given to social and economic benefits, for example contribution to net-zero, sustainable development, shared ownership. NPF4 must strongly encourage local authorities to fully recognise and consider socio-economic benefits and give them greater weight in the planning balance; this could be done by introducing a requirement for a statutory consultee to assess the socio-economic benefits of development proposals.
- 2.7 To ensure that targets for shared ownership are achieved, NPF4 should be clear that an offer of shared ownership should be treated as a material consideration in the determination of wind farm applications. This will encourage the delivery of shared ownership proposals. If an offer of shared ownership is made and the local communities do not wish to take up the offer, there should be a mechanism introduced so that local authorities and/or the Scottish Government, perhaps through CARES, could take up the offer.
- 2.8 We believe that the current practice of consenting renewable energy developments for a fixed period is not fit for purpose; therefore, NPF4 should bring renewable energy developments in line with other developments and direct that permissions must be granted in perpetuity. This will not affect the requirements for decommissioning of a scheme as provisions for this, in the case that a wind farm ceases to operate over a fixed time period, can be agreed via planning conditions.
- 2.9 NPF4 should include provisions to allow suspensive conditions in appropriate cases, for example where an objection has been made but appropriate mitigation is demonstrated to be available. This will speed up the determination process which can be unduly held up by the negotiating of contracts, such as aviation contracts.

Life-Extension, Repowering and Extensions

- 2.10 To encourage rapid deployment of onshore wind and ensure that the target date for net-zero emissions is met, NPF4 should set a presumption in favour of those developments that can increase a sites renewable energy generation.
- 2.11 Life extensions – where wind farms have sufficient structural life that their safety level is not compromised, the opportunity for life extension should be encouraged to allow wind farms to continue to contribute to net-zero, with minimal new capital investment. Should new blades be required as part of ongoing maintenance, NPF4 could support blade length increases under permitted development rights, subject to there being no material change to the appearance of the turbines and no additional environmental effects.

- 2.12 Repowering – this will enable the use of the latest technologies on sites where the principle of wind farms has already been deemed suitable. This will both enable sites to continue to contribute to net-zero and to maximise their generation output, whilst minimising capital investment for the developer through the reuse of existing infrastructure including access tracks, substation and grid connections. Without repowering, wind farms that reach the end of their consented operational life will be decommissioned, and their contribution to renewable energy will be lost; therefore, repowering is essential if Scotland is to maintain and increase its levels of renewable energy. In addition, a clear policy stance with a presumption in favour of consent of repowering schemes would create a long-term, stable investment platform for developers, boosting Scotland’s economy. NPF4 should make clear that the baseline for EIA at a repowering site should be that of the existing wind farm and that a proportionate approach to EIA requirements should be taken.
- 2.13 Extension of existing wind farms – by utilising some of the same infrastructure as the existing wind farm, the delivery of new renewable energy generation will be achieved sooner and associated environmental impact will be minimised.
- 2.14 Colocation – where possible, new wind farms and existing wind farms in retrospect, should be encouraged to include compatible technologies such as solar and energy storage to maximise the output of renewable energy generation at each site. Specific to batteries, this will bring balancing benefits to the grid network as they enable power to be delivered when needed, rather than only at the time it is being generated.

Zero-carbon Buildings & Decarbonisation of Heat

- 2.15 To meet the net-zero emissions target, NPF4 must support the decarbonisation of heat at the lowest cost and providing the greatest socio-economic benefit to the consumer. To encourage the transition to decarbonised heat, provision of decarbonised heat infrastructure should be made a strong material consideration in the planning system.
- 2.16 NPF4 should encourage developers to consider low-carbon heating at an early stage of development and direct larger developments to incorporate or connect to district heat networks. We would support the requirement for Local Heat and Energy Efficiency Strategies (LHEES), or similar, to become a statutory duty through NPF4. Local authorities should be directed to consider suitable areas for district heat networks within Local Development Plans. Inclusion within Local Development Plans will provide the opportunity for each authority to plan and respond at a local level to climate change, ensuring joined up thinking between housing, transport, waste infrastructure etc. These plans must, however, include a clear plan for delivery.
- 2.17 We would encourage NPF4 to establish a framework for heat that seeks to be technology neutral wherever possible and sets out clear heat deployment targets.
- 2.18 It is vitally important to align climate change with new developments that are key to ensuring the growth and prosperity of the country. Whilst progress has been made, we are still yet to see zero carbon developments of any scale being delivered. NPF4 should embrace this opportunity and support zero carbon developments in locations that may otherwise be deemed unacceptable, for example greenfield and Green Belt sites, even when a five-year effective housing

land supply can be demonstrated. A distinction between new development and zero carbon developments must be made if we are to deliver housing and employment in the next 10+ years that will address climate change over the long term.

- 2.19 As a developer of renewable energy and housing developments, we are exploring new technologies that focus on energy requirements and how they could be applied at a strategic scale. Whilst other developers are not required to deliver zero carbon developments competitive bidding for land will continue to be problematic. A different policy basis for exemplar schemes would provide the opportunity for companies like ourselves to deliver zero carbon schemes which will become more mainstream in subsequent years.

3 HOW CAN PLANNING BEST SUPPORT OUR QUALITY OF LIFE, HEALTH AND WELLBEING IN THE FUTURE?

- 3.1 Planning has a key role in supporting quality of life, health and wellbeing for the future. Recent demographic projections that are feeding into the latest Housing Needs and Demand Assessments being undertaken by local authorities are significantly lower than required.
- 3.2 Taking South Ayrshire as an example, the Housing Supply Target ('HST') for its proposed LDP2 seeks 270 homes per annum to be delivered. This is 53% of the HST of the current adopted LDP1 (509 units p/a) and is a lower target than has been delivered through housing completions within South Ayrshire over the last three years of data. On this basis it is fair to say that its housing targets are planning for decline from the present rate of housing delivery. This is a trend that is being seen in local authorities across the country and is a trend that does not support the assertion that the population of Scotland will grow by around 5% by 2041.
- 3.3 As NPF4 will replace Scottish Planning Policy it is important that the methodological issues that are being experienced through Housing Needs and Demand Assessments are corrected, otherwise the Scottish population will stagnate and decline.

4 WHAT DOES PLANNING NEED TO DO TO ENABLE DEVELOPMENT AND INVESTMENT IN OUR ECONOMY SO THAT IT BENEFITS EVERYONE?

- 4.1 Flexibility must be built into national planning policy as we don't know what our economy will look like in 2050. Climate change is a key issue but meeting such objectives will require widespread changes in every part of the economy. We don't know what land use implications there will be at this stage.

5 WHAT POLICIES ARE NEEDED TO IMPROVE, PROTECT AND STRENGTHEN THE SPECIAL CHARACTER OF OUR PLACES?

- 5.1 Unlocking the potential of vacant and derelict land requires an acknowledgement that such sites cannot deliver the same policy requirements as greenfield sites. There are significant upfront costs for dealing with remediation and contamination that have to be resolved before developments can commence. This must be reflected in developer contributions being sought otherwise such sites will remain undeveloped.

6 WHAT INFRASTRUCTURE DO WE NEED TO BUILD TO REALISE OUR LONG-TERM ASPIRATIONS?

- 6.1 What infrastructure we need and how it is delivered should be comprehensively reviewed, even more so in the context of COVID-19 which, even once controlled, is likely to change 'normal' habitats e.g. more working from home, less use of the private motor vehicle.
- 6.2 Developer contributions have continued to increase over the past decade, and it must be acknowledged that developers are not able to fund all infrastructure requirements. Levels of contributions have risen to over £20k per plot plus affordable housing requirements and such levels will make schemes unviable, particularly in periods of recession. Central funding for key infrastructure should be addressed with contributions for site specific matters being provided.
- 6.3 Brownfield incentives/funding packages will be needed to bring schemes forward due to the likely short to medium term economic situation. These sites tend to be located within the urban area and whilst there is planning support for their development, the viability issues they face must be addressed.

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