



Planning and Architecture Division
The Scottish Government
2-H South
Victoria Quay
Edinburgh
EH6 6QQ

04 April 2017

Dear Sir/Madam

Places, people and planning – a consultation on the future of the Scottish planning system

Scottish Renewables is the voice of the renewable energy industry in Scotland, representing over 270 organisations working across the full range of technologies providing clean, sustainable, low-carbon heat, power and transport to Britain's homes and businesses.

Creating and sustaining a fair and robust planning system is critical to ensuring that well-sited, responsibly developed projects continue to contribute towards sustainable growth, along with our energy and climate change targets.

Scottish Renewables is concerned that some of the proposals in this consultation could present a significant risk to the sector and undermine the delivery of these targets. Our concerns are set out in the attached letter, but key points are as follows:

- We are concerned that some of the proposals contained in this consultation do not align with the ambitions set out in the Scottish Government draft Energy strategy and Onshore Wind Policy Statement.
- The focus of the consultation is urban-centric and relates primarily to the provision of housing. As a result, a number of the proposals could have significant unintended consequences for the renewables industry, communities and landowners.
- We do not support the proposal for more decisions to be made by local review bodies.
- We do not agree that Section 3F of the Town and Country Planning (Scotland) Act 1997 should be removed.

Should you wish to discuss our response or have any queries, please don't hesitate to get in touch.

Yours Sincerely,

A handwritten signature in black ink that reads "S. Clark". The signature is written in a cursive, slightly slanted style.

Stephanie Clark
Policy Manager

A consultation on the future of the Scottish planning system

Introduction

Scottish Renewables welcomes the recognition of the unique contribution that the planning system can make in shaping the future of our places. We agree with the overall aim of the review to achieve a quicker, more accessible and efficient planning process in order to build investor and community confidence in the system. However, we are concerned that the focus of the consultation is urban-centric and relates primarily to the provision of housing. We understand the importance of planning for housing but a number of the proposals could have significant unintended consequences for the renewables industry, communities and landowners.

The recently published draft Energy Strategy outlines the Scottish Government's aspiration to deliver the equivalent of 50% of Scotland's heat, transport and electricity consumption from renewable sources by 2030, along with a clear message of ongoing support for existing renewable energy technologies. We welcome the level of ambition contained within the draft Energy Strategy, but believe that some of the proposals contained in this consultation could undermine this target.

We would like to see more alignment with the policies set out in the draft Climate Change Plan, Energy Strategy, Onshore Wind Policy statement and heat consultations. These consultations refer to a number of planning changes that are not referenced as part of the wider review. For example, the consultation on heat regulation proposes establishing district heating zones which will need to be considered alongside local plan policies.

We would also like to take this opportunity to highlight our concerns with existing wild land policy introduced in Scottish Planning Policy (SPP) in 2014. Since the policy was introduced, wild land has been cited as a major issue in a number of planning decisions. Whilst wild land policy was never intended to preclude any development within a wild land area (WLA) it appears to be in danger of having that effect. In addition, impacts on WLA are now being raised in connection with wind farms located outside and at considerable distance from WLAs (e.g. more than 10km), raising the risk of creeping sterilisation of buffer zones. We would welcome a review of the policy to ensure it is not obstructing sustainable development.

Repowering of Scotland's existing onshore wind farms is essential if Scotland is to maintain and increase its levels of renewable energy and the many benefits the industry brings to Scotland's economy and environment. As we approach a time where more wind farms may be considered for repowering, we consider that the Scottish Government's policy position that an area hosting a consented wind farm may be considered suitable for wind development in perpetuity could be strengthened by making it clear in guidance that the environmental baseline for a repowered site should be the wind farm as it is currently consented and not the site with the wind farm decommissioned and removed.

Making Plans for the Future

A. Do you agree that our proposed package of reforms will improve development planning?

We believe the package of reforms has the potential to improve development planning but are concerned that some proposals will have the opposite effect. Please see comments below on specific proposals.

Q1. Do you agree that local development plan should be required to take account of community planning?

We welcome the proposal to strengthen links between the development plan and community planning. It is important that any guidance on community and spatial planning must adhere to policies set out in the National Planning Framework (NPF) and Scottish Planning Policy (SPP). We look forward to engaging in the process on developing future guidance.

Q2. Do you agree that strategic development plans should be replaced by improved regional partnership working?

In theory, we are supportive of plans to remove Strategic Development Plans. However, there is very little detail on how proposals for regional partnerships would work in practice and how this would be resourced. More detailed on this is required before a definitive answer to this question can be provided.

(a) How can planning add greatest value at a regional scale?

Again, more information on this proposal is required before a detailed answer can be provided. However, as a general statement, regional planning and associated development plans should provide clear focus and direction which should be followed in the preparation of Local Development Plan's (LDPs). We would expect national priorities to be translated into the LDPs which will avoid conflicting policy statements at the LDP level.

(b) Which activities should be carried out at the national and regional levels?

At a national level, national priorities such as nationally significant developments and policy priorities, such as the NPF and SPP should remain the responsibility of the Scottish Government. Developments that are helping to meet Scottish Government priorities set out on the Energy strategy and Climate Change Plan should be supported by planning policy at a national and regional level.

(e) What role and responsibilities should Scottish Government, agencies, partners and stakeholders have within regional partnership working?

In order to deliver successful outcomes regional partnerships should have clear aims and terms of reference. Scottish Government, agencies, partners and stakeholders should be involved in the setting of these aims as they should be consistent with the NPF and SPP. Scottish Government should also ensure that regional partnerships deliver on these aims, are fit for purpose and are sufficiently resourced to do so.

3. Should the NPF, SPP or both be given more weight in decision making?

We welcome plans to give both NPF and SPP more weight in decision making. However, this is dependent on meaningful and robust consultations on both documents.

(a) Do you agree with our proposals to update the way in which the National Planning Framework (NPF) is prepared?

This is double the time period recommended by the independent review panel which suggested 'scope for updating it between 5 year review cycles'. A 10 year review cycle would limit the ability to respond to developments in technology. If the cycle is extended to 10 years then it is critical that a review period is built into the cycle

We understand that the timing of NPF4 and the revision of SPP will be considered later this year following publication of the NPF3 Monitoring report and look forward to engaging in this process.

4. Do you agree with our proposals to simplify the preparation of development plans?

We agree with the findings of the independent review that a plan led system should remain in place and that the process for preparing development plans should be simplified in order to ensure a balance between plan making and delivery of a plan. We have set out our concerns on specific proposals below.

(a) Should the plan review cycle be lengthened to 10 years?

We do not support proposals to extend the review cycle to 10 years. This approach is at odds with the plan led system that we wish to retain. As it stands, development plans are often out of date and with

resource constraints within local authorities this is only likely to worsen if the review cycle is increased to 10 years.

We are concerned that dynamic sectors, such as renewable energy, which evolve more rapidly than other more established sectors could become out dated very quickly. It is therefore critical that LDPs are future-proofed and take account of future developments and emerging technologies. Extending the LDP cycle to 10 years could reduce the ability of the development plan process to effectively respond to changes in technology.

(b) Should there be scope to review the plan between review cycles?

If the cycle is extended to 10 years then it is critical that a review period is built into the cycle.

(c) Should we remove supplementary guidance?

We agree with the proposal to remove supplementary guidance from the development plan in order to remove complexity. However, the proposal set out in paragraph 1.30 to 'provide a manual or set of advice that guides how applications for planning consents are considered' lacks detail as to the materiality of any alternative guidance. We would welcome further detail on this.

5. Do you agree that local development plan examinations should be retained?

External scrutiny to ensure alignment with wider government policies, including SPP and NPF is essential.

(a) Should an early gatecheck be added to the process?

There is merit in an early check to ensure alignment with overarching policies. However, this should not be in place of additional scrutiny later on in the process. Further consideration as to the most appropriate timing on this to ensure the gatecheck is meaningful and not simply a checkbox exercise is required.

(b) What matters should the gatecheck look at?

The gatecheck should look at matters such as; compliance with national policy priorities, a check for contradictory policy statements and to ensure that any departures from policy are justified with suitable evidence.

(c) What matters should be the final examination look at?

The final check should look at all unresolved objections, ensuring compliance with national priorities.

7. Do you agree that plans could be strengthened by the following measures (questions a-d)?

As noted earlier in our response, energy developments are rarely 'allocated sites' so we are concerned that the proposals could result in additional requirements for non-allocated sites. Renewable energy developers follow or go beyond industry good practice in terms of pre-application community engagement and engagement with key consultees. We therefore question the proposal in paragraph 1.44 that suggests that for sites which have not been allocated within the LDP, different consultation requirements and fee structures should apply. We do not agree with this approach and welcome clarity on the proposal.

8. Do you agree that stronger delivery programmes could be used to drive delivery of development?

We welcome efforts to improve the delivery of development.

People make the system work

B. Do you agree that our proposed package of reforms will increase community involvement?

Yes, but we are concerned that some of the proposals may act as a barrier to development.

9. Should communities be given an opportunity to prepare their own local place plans?

Community engagement is an important aspect of the development process and sharing advice and knowledge of real experiences is an excellent way of improving practice across Scotland. However, as highlighted by the independent review, the experience of neighbourhood planning in England and Wales, created under the Localism Act 2011, has been mixed. More than half of the draft plans published for consultation (55%) have been described as having ‘protectionist’ agendas and being openly anti-development¹ and we are concerned that this could cause unnecessary delay and act as a barrier to development.

We are supportive of communities being involved in the planning system and inputting into proposals for their local area, however we are concerned that communities may not have the resources, skills and knowledge to prepare local place plans which can be translated into viable development options. This consultation document does not adequately address how this proposal will be resourced or the additional burden that it may add to local authorities.

Given our concerns, we would welcome further clarity on the role of the local place plan, the level of scrutiny that would be applied and the availability of resources and skills to develop these plans, at a local level. We would suggest efforts could be more effectively focussed on improving community involvement in the existing LDP process.

(a) Should these plans inform, or be informed by, the development requirements specified in the statutory development plan?

If local place plans are introduced, these should be informed by national planning policy and should align with wider Scottish Government policy ambitions. The plans should also be informed by the statutory development plan and afforded the same scrutiny and examination as an LDP.

(b) Does Figure 1 cover all of the relevant considerations?

We are concerned that the process as described in Figure 1 may be considered onerous and costly, and that occasions may also arise where different groups submit contradictory plans.

We would also recommend that instead of local place plans requiring to be ‘generally in line with local and national planning policies’ the requirement should be absolute in requiring local place plans to be in accordance with LDPs and national planning policy. This would guard against the potential for local place plans to depart from national and regional objectives. We also advise that local place plans having the ability to be rolled forward into replacement plans (assumed to be a replacement development plan) needs some careful measure to determine whether the local place plan is still up to date and relevant. A local place plan that is neither up to date nor relevant should have no place in any future iteration of the Development Plan.

Whilst community engagement in planning is strongly supported, we would not like to see local place plans become a barrier to sustainable economic development.

10. Should local authorities be given a new duty to consult community councils on preparing the statutory development plan?

We support the proposal to consult community councils on preparing the statutory development plan, and understand that in many cases, this already happens.

11. How can we ensure more people are involved?

(a) Should planning authorities be required to use methods to support children and young people in planning?

¹ http://www.turley.co.uk/sites/default/files/uploads/news/Turley_%20Neighbourhood%20Planning_March_2014.pdf

We are supportive of efforts to support engagement in the planning process. However in order to be effective, planning will need to be embedded into the school curriculum at a national level to ensure it fits with an already stretched timetable.

12. Should requirements for pre-application consultation with communities be enhanced?

In the renewables industry, pre-application consultation with communities is standard practice as it is in the developer's best interests to ensure that communities are engaged at the earliest possible opportunity of a forthcoming development. We therefore suggest that planning advice would be more appropriate in ensuring that the opportunities to engage are innovative and purposeful.

(a) What would be the most effective means of improving this part of the process?

The current regulations for placing statutory adverts for development proposals in the Edinburgh Gazette and relevant local/ regional press are an outdated mode of communication and as such, we do not consider them to be a suitable platform to raise awareness of proposals and consultation events. More effective may include online resources and social media.

(c) Are the circumstances in which PAC is required still appropriate?

Yes, for major and national developments it is still appropriate.

13. Do you agree that the provision for a second planning application to be made at no cost following a refusal should be removed?

No, our view is that this provision should remain. This proposal should be looked at again in the context of plans to increase planning fees and the potential consequences, particularly the financial implications for smaller developers. Other potential consequences would also need to be considered e.g. would developers become more reluctant to withdraw applications and resubmit with amended designs? Would it result in a greater number of appeals?

15. Should current appeal and review arrangements be revised:

(a) For more decisions to be made by local review bodies?

No, we strongly object to this proposal and believe that it will act as barrier to development which is a key objective of the reform process.

As highlighted in our response to the call for evidence from the independent panel, Scottish Renewables' members continue to express concern with the unpredictability and lack of scrutiny in the review process. Many Local Review Bodies (LRBs) are ill-equipped to make decisions on renewable energy projects due to the level of complexity and level technicality involved. Our concerns are echoed in the report from the independent panel which highlights continuing concerns about inconsistency in their working practices and decision making.

A report prepared by Kevin Murray Associates analysing submitted written evidence² highlighted,

“The Local Review Board (LRB) mechanism was criticised by a number of respondents as being inadequate, inconsistent and at risk of being politically manipulated. A more reliable, credible and consistent mechanism was sought particularly by industry operators such as MNOs and energy companies.”

Given the findings on the analysis on written evidence and the report from the independent panel, we were surprised to see proposals for more decisions to be made at this level.

We have explored two possible improvements to the process with members and have provided more detail on each below.

² <http://www.gov.scot/Resource/0049/00497228.pdf>

1. Change the criteria for the type of decision that can be delegated

The requirement for EIA broadly relates to the size of the development but also takes into consideration the sensitivity of the environment in which the development is proposed. For most development types, the thresholds for becoming a 'Major' development broadly accord with the guideline thresholds set out in Schedule 2 of the EIA regulations for EIA screening (determining whether an EIA is necessary) with the exception of wind farms.

If an EIA is required, then in many cases, the developer's application costs will increase from a relatively small amount, to several hundred thousand pounds. The requirement for EIA would, therefore, seem to be a logical test for whether an application is 'major' or 'local' in most cases Planning guidance could therefore be amended to state that EIA development cannot be regarded as "Local" and, therefore, appeals cannot be determined by the council.

2. Change the route that appeals can take

The alternative option is to maintain the status quo with regards to delegated decisions but remove the "Local Review Body" route to appeal. All appeals would have to be made to the DPEA. This would create a fairer planning system that gives developers or would-be developers more confidence that by being compliant with planning policy, they are likely to get planning permission.

(d) To introduce fees for appeals and reviews?

Annual statistics provided by the DPEA³ show that the success rates for delegated appeals is 48%, this suggests that half of the decisions did not strike the right planning balance. An introduction in fees would increase costs for developers that are ultimately successful on appeal. As highlighted elsewhere in this response this would be contrary to the Scottish Government's priorities in relation to cost reduction. Therefore, if fees are introduced the requirement for a clawback mechanism for successful appeals should be considered.

(e) For training of elected members involved in a planning committee or local review body to be mandatory?

Yes, we would welcome training for any committee members or members taking part in LRBs to increase the knowledge and skills base which would increase the quality of decision making. Some form of accreditation/membership to the Royal Town Planning Institute may be an appropriate route as part of training and may instil greater trust in their decision making.

However, we remain concerned that some decisions are made for local political reasons, particularly those involving onshore wind developments.

(d) Do you agree that Ministers, rather than reporters, should make decisions more often?

No, we believe that the extra resources required in reporting and advising the ministers will result in significant delays to the decision making process.

Building more homes and delivering infrastructure

C. Will these proposal help to deliver more homes and the infrastructure we need?

At this stage there is not enough information to determine whether or not these proposals will have an impact, this is particularly true given that most of the proposals in this section refer to allocated sites which are not relevant for most energy infrastructure projects.

³ <http://www.gov.scot/Resource/0048/00485308.pdf>

21. Do you agree that rather than introducing a new infrastructure agency, improved national co-ordination of development and infrastructure delivery in the shorter term would be more effective?

Yes, but consideration should be given to introducing a new infrastructure agency in the longer term.

22. Would the proposed arrangements for regional partnership working support better infrastructure planning and delivery?

At this stage there is insufficient detail to assess whether regional partnership working would better support infrastructure planning and delivery.

23. Should the ability to modify or discharge Section 75 planning obligations (Section 75A) be restricted?

No, this is an important check to ensure that planning authorities do not seek excessive or unjustified contributions. We also do not believe that there is any evidence to suggest that this proposal is required, the number of S75A appeals have been relatively low to date. The introduction of restrictions could result in more cases going to court which increase delays and costs.

24. Do you agree that future legislation should include new powers for an infrastructure levy?

As highlighted in paragraph 5.2 “ability to bring forward development proposals, particularly for housing, is directly influenced by the cost and timing of additional infrastructure requirements.” Therefore it would seem that this proposal has arisen due to housing shortages and does not necessarily correlate with renewable energy developments. We would welcome clarity on this matter.

In terms of onshore wind, the introduction of an infrastructure levy would increase costs for onshore wind developments which would be at odds with the Scottish Government’s focus on cost reduction and challenge to the industry to develop the UK’s first commercial wind farm without subsidy in Scotland.

25. Do you agree that Section 3F of the Town and Country Planning (Scotland) Act 1997, as introduced by Section 72 of the Climate Change (Scotland) Act 2009, should be removed?

The ClimateXChange study⁴ referenced in the consultation paper shows a modest increase in the uptake of Low and Zero Carbon Generating Technology (LZCGT) but states that it was not possible to determine “whether this was a direct result of Section 3F policies or due to a number of external factors such as improvements in Building Standards legislation, the regional context, market influences and consumer preferences was impossible to determine in this study.” The study also highlights that the potential of Section 3F policies should not be underestimated in helping to promote awareness, support uptake of more sustainable buildings, and encourage the adoption of more innovative and efficient energy infrastructures.” Taking these findings from the study into account, proposals to remove section 3F seem to be at odds with the target to reduce Scotland’s greenhouse gas (GHG) emissions by 80 per cent by 2050.

While the study shows that there is little evidence of added value, this could be a result of the fact that the vast majority of new developments are being built without any LZCGT. Experience from our members to date suggests that developers are not committed to paying for LZCGT technologies and planning authorities are very reluctant to challenge that view in case a development is put at risk.

The removal of section 3F coupled with proposals to focus on energy efficiency up to 2025 could have a significant impact on the renewables industry in Scotland.

⁴ http://www.climateexchange.org.uk/files/8014/5823/6535/LDP_GHG_-_Full_report.pdf

Stronger leadership and smarter resourcing

D. Do you agree the measures set out here will improve the way that the planning service is resourced?

No, we are concerned that unless provisions are ring fenced, additional fees will not necessarily be used to resource the planning system. Any increase in cost within the planning system must address current resource issues.

Q.31. Do you have any comments on our early proposals for restructuring of planning fees?

In February, [Scottish Renewables responded to the consultation on raising planning fees](#)⁵. Our response states that we are willing to see an increase in fees but have yet to see any details on how performance improvement will be achieved. Until this time we cannot agree with the proposed maximum fee level.

The proposed changes would result in an increase of over 500% in the costs for a planning application for some developments. Before any increase could be deemed acceptable by the renewables industry there would have to be tangible improvements to the planning service.

The Scottish Government's draft Onshore Wind Policy Statement, sets a challenge to industry to develop the UK's first commercial wind farm without subsidy in Scotland. It also states that securing a route to market for onshore wind of all scales is a priority of the Scottish Government.

We believe that it is critical that the Scottish Government maximises the use of the devolved policy levers it has available such as planning, while continuing to closely engage with the UK Government on market mechanisms, regulation and revenue support. We recognise that it is only reasonable that the costs of processing a planning application should be reflected in the fees paid by applicants. However, with the changes to the economic landscape we feel that increases of 500% for some developments without a clear link to improved service cannot be justified at this stage.

We would welcome further discussions on what interventions could improve the efficiency of the process, for example, ring-fencing planning fees in return for a fast tracked and efficient service. Another suggestion would be to link payment to the delivery of the different phases of an application (pre-application/scoping, application, consultation, determination, condition discharge etc). Further information on measures to disincentivise poor performance also needs to be provided.

Fee structure

Scottish Renewables' response to the 2012 consultation on planning fees highlighted our concern that an area based approach to planning fees for renewables is not in line with the nature or scale of proposals. At the time we suggested that a cost per MW would be a fairer and more proportionate way of calculating fees for renewable energy projects, and still believe this to be the case. Another option would be to base the fee on the land actually developed rather than the red line site boundary. We understand that a consultation on fee structure will take place at a later date and look forward to the opportunity to engage in this process.

32. What types of development would be suitable for extended permitted development rights?

We are supportive of extended permitted development rights for developments that will help achieve the targets set out in the draft Climate Change Plan and the Scottish Government's Energy Strategy.

In recent years the permitted development rights in England and Wales have been extended, and there is scope for similar expansion in Scotland.

⁵ <https://www.scottishrenewables.com/publications/draft-consultation-response-raising-planning-fees/>

Currently class 40 of the Town and Country Planning (General Permitted Development) (Scotland) Order 1992 grants permitted development rights to holders of licences under the Electricity Act 1989 for the purposes of their statutory undertaking.

Class 40 gives licence holders the right to install underground grid connection cables and buildings to protect plant and machinery, such as substations.

When class 40 was put in place, most developers and operators of electricity generating stations would likely also hold a licence under the Electricity Act 1989. The move to renewable energy means that that is no longer the case. However, many developers and operators do not require to hold a licence under the Electricity Act and so cannot rely on Class 40. This leads to anomalous situations where one entity (for example a district network operator, or a largescale wind farm operator or utility) can install an underground grid connection without needing to apply for planning permission, while another operator (who does not have a licence) must apply for planning permission to install exactly the same piece of infrastructure.

We recommend that class 40 is made available to undertakers constructing or operating a generating station to allow for the installation of underground grid connections and buildings to protect plant and machinery. This change would be of particular benefit to community development and ownership of renewable projects, and could assist in reaching the Scottish Government target of 1GW of renewable energy development in community ownership by 2020.

Class 6J permits the installation, alteration or replacement of solar PV or solar thermal equipment on a non-domestic building. The permitted development is restricted to equipment which would not protrude (i) more than 200 millimetres beyond the roof, (ii) higher than the roof ridge, or (iii) outwith the edges of the roof. This restriction has clearly been put in place to limit impacts on amenity. However, now that the principle of solar development as permitted development has been established, the possibility of extending solar permitted development should be explored.

Class 6K permits works for the generation of energy from, and the storage of, biomass on agricultural land. Class 6L permits such works on land used for the purposes of forestry. Class 6M permits the extension or alteration of industrial buildings or warehouses for those purposes. This could be extended to other types of land.

33. What targeted improvements should be made to further simplify and clarify development management procedures?

Examples of improvements that could help the delivery of renewable energy projects include:

- **Post planning variation procedures**

Experience from our members suggests post-planning variation procedures vary greatly by planning authority due to varying definitions of what constitutes a material and non-material variation. Standard guidance is not adhered to across authorities, so what constitutes a material variation in one area, requiring a new application, may be acceptable in another.

The requirement for subsequent applications can prove to be very costly and time consuming. In order to address this inconsistency, clear and concise guidelines are required to set out what constitutes a material change.

- **Decommissioning and Restoration bonds**

Given the need for a decommissioning and restoration plan to be agreed between developers and the relevant planning authority before consent is granted, we believe guidance is required to ensure that any disagreements can be resolved quickly and effectively. Whilst we do not believe there should be a 'one size fits all' approach, in order for bonds to be effective, balanced guidance is required to steer them in the right

direction. Feedback from members suggests they are already experiencing divergent approaches from planning authorities.

A realistic approach to the valuation of bonds should be established using agreed standards across industry and the relevant authorities. Scottish Renewables plan to work with our members, the Scottish Government, local authorities and relevant agencies to explore if guidance can be developed to assist in creating decommissioning and restoration plans.

- **Heat Networks**

More progressive planning policies would help drive forward and deliver the step change in development needed to meet Scotland's renewable heat targets. Experience in other parts of the UK and Europe has found that a strong planning framework plays a key role in ensuring a significant uptake of renewable and low-carbon heat technologies.

We are aware that the Scottish Government is currently consulting regulation for district heating and in particular the potential to create district heating zones. It is imperative that the consultation on planning reform also takes this into consideration.

- **Repowering**

The Committee on Climate Change recently reported that renewable energy capacity in the UK will need to double by 2030 if we are to meet our binding climate change targets. It is clear that, to achieve this, we will need to continue to develop and repower onshore wind sites at the lowest possible cost. It is therefore essential that the application process is streamlined wherever possible; taking into account the site's existing use as highlighted in SPP and using all relevant existing information from the previous/existing development to inform planning decisions for the new development. With this in mind, we believe that the environmental baseline should reflect the environmental conditions at the time of the repowering application and not the baseline conditions of the original wind farm applications submission.