



A specialist energy consultancy

Planning, Design and Access Statement

Neilston Greener Grid Park Section 36 Application

Statkraft UK Ltd

15957-020-R1
23 August 2024

COMMERCIAL IN CONFIDENCE



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1 Introduction

This Planning, Design & Access Statement has been prepared by TNEI Services UK Limited (TNEI) on behalf of Statkraft UK Ltd (the Applicant) to accompany an application for consent under Section 36 of the Electricity Act 1989 (the Electricity Act) and associated deemed planning permission, for the construction and operation of a Greener Grid Park (GGP) and associated infrastructure, with a generating capacity of up to 750 megawatts (MW), (hereafter referred to as the Proposed Development).

The location Proposed Development of the is an area of land 400m to the northwest of Sergeantlaw, to the southeast of Gleniffer Road, Paisley (the Site). The Site is centred at approximate grid reference NS 42665 57399 and the nearest post code is PA2 8UY.

As the Proposed Development exceeds 50 MW in capacity, it requires consent from the Scottish Ministers under Section 36 of the Electricity Act 1989. As a result, a Section 36 application is submitted for the Proposed Development, along with a request for a direction to be issued under Section 57 (2) of the Town and Country Planning (Scotland) Act 1997 that planning permission be deemed to be granted.

As part of the decision-making process, the Scottish Ministers will review whether the Applicant has fulfilled the requirements placed upon them by Schedule 9 (3) of the Electricity Act. Furthermore, the decision will require an evaluation of the Energy Policy and the relevant aspects of the National Planning Policy with a particular focus on the recently adopted NPF4 and the statutory Local Development Plan (LDP) for South Lanarkshire. In the context of the Section 36 application, the LDP is a material consideration, and no statutory presumption applies in relation to it.

1.1 The Applicant

Statkraft is one of the world's original renewable energy companies. Established in Norway more than 125 years ago, we have grown from one hydropower station to be Europe's largest renewable generator and a leading provider of energy market operations.

Since coming to Great Britain, Statkraft has invested more than £1.4 billion in clean energy, and also forged critically important routes to market for other GB-based renewable generators – managing 12.3TWh annually through power purchase agreements, equivalent to nearly 10% of the country's total renewable generation.

Statkraft's portfolio and development pipeline includes wind, solar and pumped storage hydro power, Battery Energy Storage Systems (BESS), grid stability, and green hydrogen projects. As renewable energy generation increases across Great Britain, new ways to maintain system stability are required. Greener Grid Parks are helping to achieve a renewables-ready network. Greener Grid Parks are sites comprised of various grid stabilising equipment, a mix of large flywheels and battery technology, which depending on the needs of the grid and technology choice, can import, store, and export electricity. Our Greener Grid Parks will reduce the need to operate fossil-fuelled gas power stations - saving costs, CO2 emissions and contributing to the UK's pledge to reach Net Zero by 2050.

Statkraft's multi-technology offer and energy market solutions are helping to modernise Great Britain's electricity system and to decarbonise the hardest to reach parts of the economy.

Beyond delivering benefits for energy security and economic competitiveness, we are committed to being a good neighbour – playing our part in making sure the communities who host Statkraft projects see the benefits that the journey to net zero offers to them and their environment.



1.2 Approach

This Statement combines the Planning Statement and Design and Access Statement requirements and comprises a series of sections that cover the design principles and concepts that have been applied to the Proposed Development in response to its context and how issues relating to access have been dealt with. It also includes a planning Policy appraisal. The structure of this Statement is as follows:

- Section 1: Introduction.
- Section 2: Background to the Proposed Development
- Section 3: Site Location and Description.
- Section 4: Proposed Development
- Section 5: Need and Benefits of the Proposed Development.
- Section 6: Design Considerations.
- Section 7: Development Phases.
- Section 8: Climate Change Strategy and Legislative Framework.
- Section 9: UK and Scotland Planning and Energy Policy
- Section 10: Planning Policy Assessment.
- Section 11: Conclusion.

It should be read in conjunction with the following supporting documents and planning drawings:

Supporting documents

- Biodiversity Enhancement and Management Plan (document reference: 784-B042549 Neilston GGP S36 BEMP) prepared by Tetra Tech;
- Cable Route Construction Method Statement (document reference 15957-029 Construction Method Statement R1);
- Construction Traffic Management Plan (document reference 240616 Neilston S36 CTMP) prepared by Pell Frischmann;
- Detailed Drainage Design (document reference: 23001_VB_V01_S.36 Neilston Battery Storage_Detailed Drainage Strategy_Text) prepared by Carlos Vazquez-Beseda;
- Ecology - Preliminary Ecological Appraisal (document reference: 784-B042549 Neilston GGP S36 PEA Report) prepared by Tetra Tech;
- Ecology Breeding Bird Survey (document reference: 784-B042549 Neilston GGP S36 Breeding Bird) prepared by Tetra Tech;
- Lighting Plan Review – Technical Note (document reference: 784-B042549) prepared by Tetra Tech;
- Fire Water Management Plan (document reference: GON.0453.0239 Neilston Greener Grid Park S36 Application FWMP) prepared by Gondolin;
- Landscape and Ecology Management Plan (document reference: 784-B042549 Neilston GGP S36 LEMP) by Tetra Tech and TGP;
- Landscape and Visual Assessment (document reference: 2161 Neilston s36 LVA) prepared by TGP;
- Noise Impact Assessment (document reference: 15957-019-R0) prepared by TNEI;
- Pre-Application Consultation Report (document reference: 15957-002 Neilston PAC Report R2) prepared by TNEI; and

- Planning Design and Access Statement (document reference: 15957-020 R1) prepared by TNEI.

Planning Drawings

- 15957-008 Elevation - Diesel Generator;
- 15957-009 Elevation - Auxillary Transformer;
- 15957-010 Elevation - Control and Switchgear Buildings;
- 15957-011 Elevation - HV Yard;
- 15957-012 Elevation - TYPE B BESS;
- 15957-013 Elevation - TYPE C BESS;
- 15957-014 Elevation - Stores and Welfare Buildings;
- 15957-015 Elevation - MV Room;
- 15957-016 Elevation - External Fence;
- 15957-021 Elevation - Underground Water Tank;
- 15957 - 024 Site Location Plan;
- 15957 - 025 Proposed Site Layout Plan;
- 15957 - 026 Existing Site Layout Plan - 1250 Scale;
- 15957 - 026 Existing Site Layout Plan - 500 Scale;
- 15957-027 Elevation - TYPE A BESS;
- 15957-028 Elevation – Genset;
- 15957-031 Elevation - Cable route cross section; and
- 15957-033 Elevation - CCTV Pole.

2 Background to the Proposed Development

2.1 Need for the Proposed Development

The Proposed Development consists of the formation an up to 750MW Battery Storage Facility, comprising up to 88 battery storage container blocks and associated infrastructure, storage containers, welfare, diesel generators, CCTV and lighting columns and associated access, internal access roads, hard and soft landscaping, SuDS Basin, perimeter fence and underground grid connection cable.

The wider need for and acceptability in principle of the GGP was established in the previous application and approved through Planning Appeal reference PPA-350-2047 and is not repeated here.

2.2 Social and Economic Context

The Proposed Development would provide economic benefits to the local area associated with the wider GGP, which in turn, although temporary, could support wider employment opportunities with associated jobs e.g., construction industry, supply chain as well as providing more reliability of the electricity network.

The Proposed Development would result in an improvement to the reliability of the electrical network. In the move toward a low carbon economy, it would allow increasing levels of renewable energy generation to be more fully integrated into the electrical system.

The granting of this consent would support the deployment of a mature technology in the UK, with the ultimate aim of making a valuable contribution to the UK's secure, low carbon and affordable electricity system, at least cost to consumers.

2.3 Regulatory Context

2.3.1 The Electricity Act 1989

In August 2020, the Scottish Government set out its position on electrical 'storage' and the appropriate consenting regime for decision making, noting the respective roles of the Planning Act (Scotland) and the Electricity Act. The Scottish Government considers that a battery installation generates electricity and is therefore to be treated as a generating station. As a result, a battery installation should be treated as any other generating station for the purposes of a Section 36 consent under the Electricity Act.

Therefore, as it has a capacity to generate over 50 MW, the Proposed Development requires consent from the Scottish Ministers under the Electricity Act. In such cases the Planning Authority is a statutory consultee in the development management process and procedures.

2.3.2 The Town and Country Planning (Scotland) Act 1997 (as amended)

The principal planning statute in Scotland is the Planning Act (Scotland) 1997 (as Amended). Section 57(2) of the Planning Act (Scotland) provides:

"On granting or varying a consent under Section 36 or 37 of the Electricity Act 1989, the Scottish Ministers may give a direction for planning permission to be deemed to be granted, subject to any conditions (if any) as may be specified in the direction".

Section 25 of the Planning Act states that:

"Where, in making any determination under the planning Acts, regard is to be had to the development plan, the determination is, unless material considerations indicate otherwise-



(a) To be made in accordance with that plan...”.

Section 57(2) of the Planning Act makes no reference to the provisions of Section 25 which requires regard to be had to the provisions of the Development Plan and the Courts have confirmed that Section 57(3) does not operate so as to apply Section 25 to a decision to make a direction to grant deemed planning permission pursuant to Section 57(2)17.

Accordingly, the Scottish Ministers will determine the Application having regard to the statutory duties in Schedule 9 of the Electricity Act, so far as relevant, and any other relevant material considerations, one of which will be relevant aspects of the statutory Development Plan.

2.3.3 Environmental Assessment Regulations

For Applications submitted for consent under the Electricity Act, there may be a requirement to undertake an Environmental Impact Assessment (EIA).

EIA development in respect of an application is defined in the Electricity Works (Environmental Impact Assessment) (Scotland) Regulations 2017 as amended (the EIA Regulations), as a proposed development which is either “Schedule 1” development, or a “Schedule 2” development likely to have significant effects on the environment by virtue of factors such as its nature, size, or location.

The Proposed Development as a ‘generating station’ constitutes Schedule 2 development in terms of the EIA Regulations. As such, a request to the Scottish Ministers for a Screening Opinion was required to determine whether the Proposed Development was deemed EIA development or not.

2.4 Planning History

2.4.1 Previous Planning Applications

The planning history of the Site is set out in the below table.

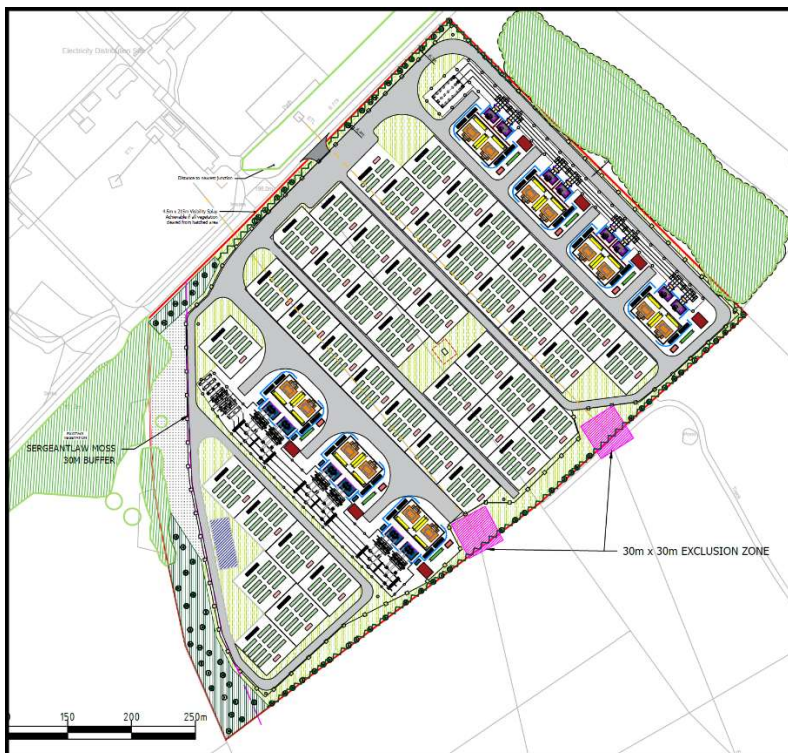
Table 2.1: Previous Planning Applications

Ref.	Description of Development	Decision	Date
ECU00004988	Screening Opinion of the Scottish Ministers in respect of the proposed application for consent under Section 36 of the electricity act 1989 to construct and operate the proposed Battery energy storage system situated on land 400 metres north west of Sergeantlaw, Gleniffer Road, Paisley.	EIA Not Required	29/05/2024
23/0697/EA	Request for screening opinion to Energy Consents Unit for an Environmental Impact Assessment relating to the proposed construction and operation of a Battery Energy Storage System (BESS) with installed capacity in excess of 50 megawatts (MW) (Consultation request from to Renfrewshire Council)	EIA not Required	21/12/2023
23/0224/PP	Installation of buried cable connection and HV yard, and repositioning of Site access.	Granted	30/11/2023
23/0497/NMV	Non-Material Amendment for the relocation of battery storage units to the north west corner of Site to provide greater clearance distance from overhead lines crossing the Site.	Approved	27/09/2023

Ref.	Description of Development	Decision	Date
VA1/21/0034/PP	Non-Material Amendment to 21/0034/PP for the minor relocation of previously consented battery units.	Approved	20/02/2023
PPA-350-2047	Appeal of refusal by Renfrewshire Council for planning application ref 21/0034/PP - Installation of greener grid park including energy management and battery storage containers with associated access, landscaping, and fencing.	Appeal Allowed	28/04/2022
21/0034/PP	Installation of greener grid park including energy management and battery storage containers with associated access, landscaping, and fencing.	Refused	05/11/2021
20/0440/EO	Request for screening opinion as to the requirement for an Environmental Impact Assessment relating to the erection of an Energy Management Facility. Renfrewshire Council determined that an environmental assessment is not required to accompany a planning application in respect of the above proposal.	EIA Not Required	01/10/2020

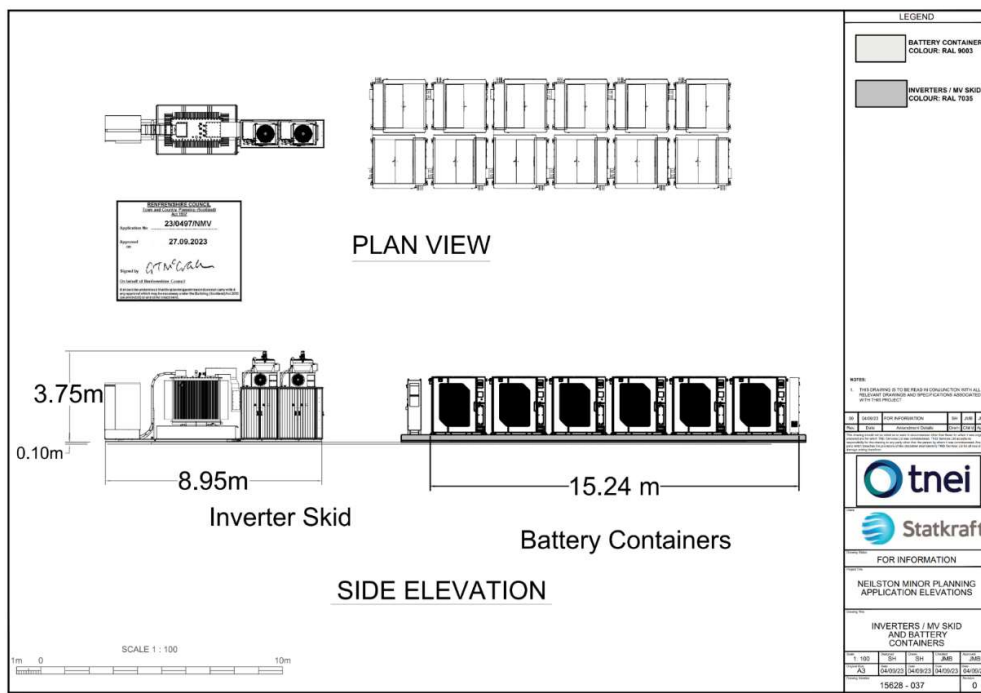
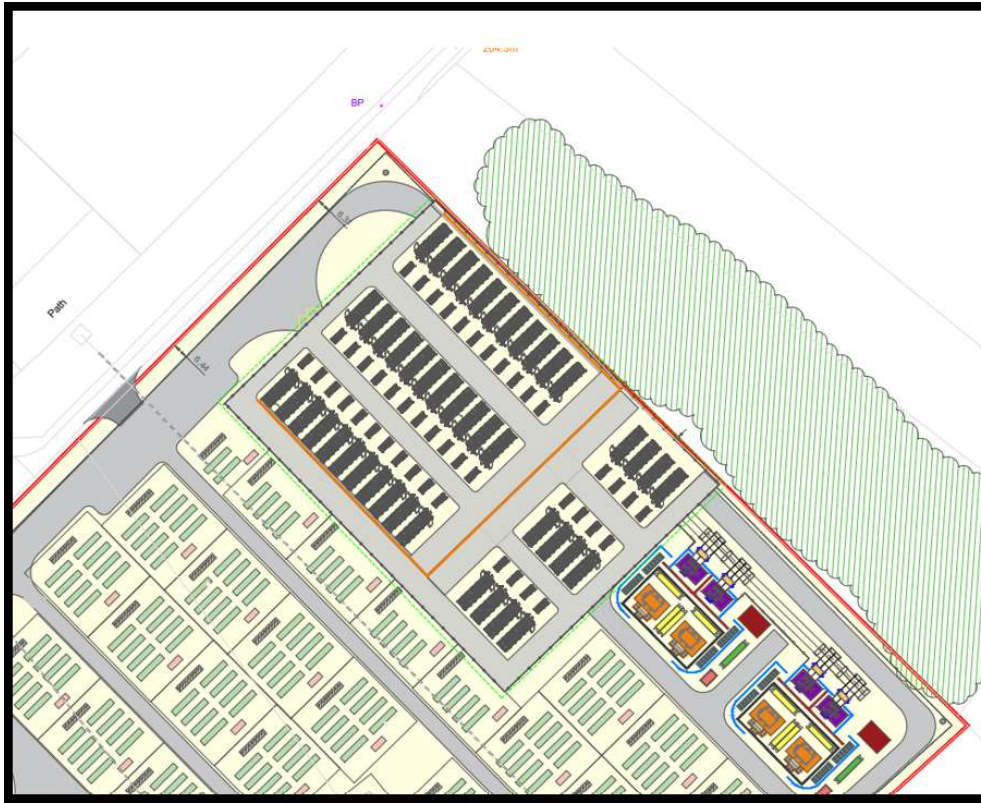
By way of background, the Neilston Greener Grid Park (GGP) proposal (LPA Ref. 21/0034/PP), which proposed ‘energy management and battery storage containers with associated access, landscaping and fencing’ was originally refused full planning permission by Renfrewshire Council (the LPA) dated 8 Nov 2021 due to landscape visual impact reason.

An appeal was subsequently submitted to the Scottish Government’s ‘Division of Planning and Environmental Appeals’ (DPEA) in February 2022. The appeal was allowed (DPEA Ref. PPA-350-2047) by the Reporter on 28 April 2022 and therefore planning permission granted. The approved layout is shown below.

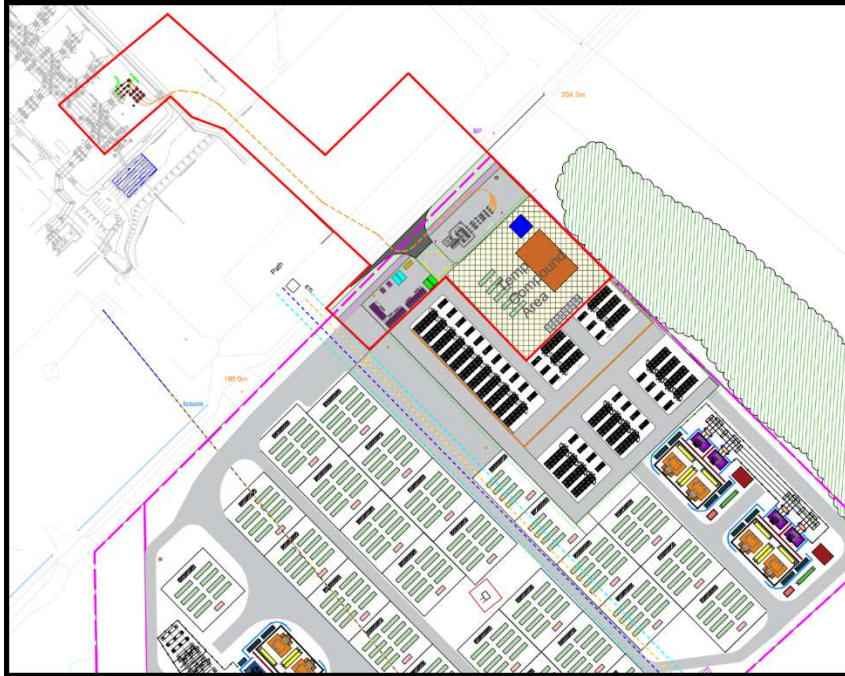


Copies of the appeal decision and the approved plans are contained at **Appendix A**.

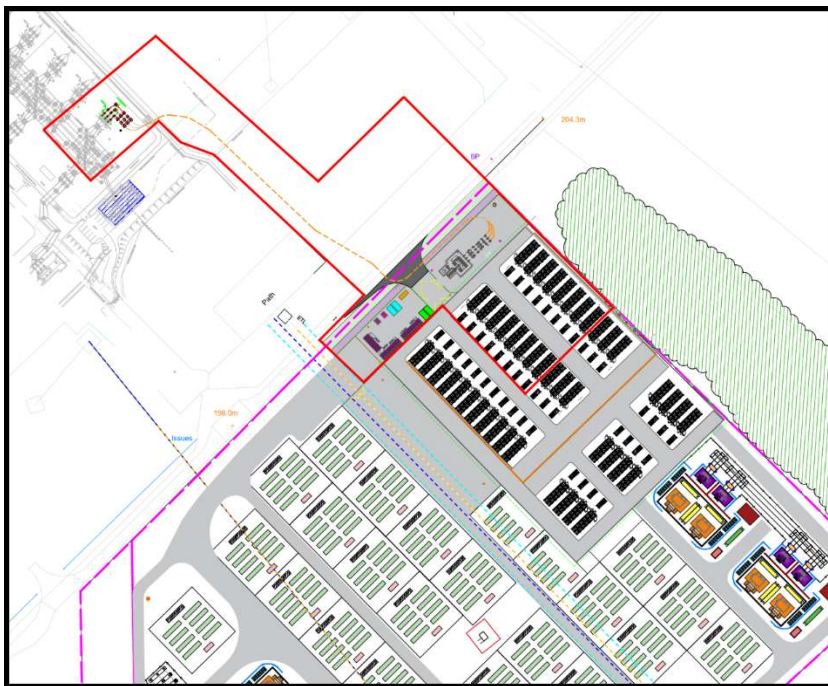
The applicant subsequently amended the Appeal Scheme via a Non-material Variation (NMV) application (LPA Ref. 23/0497/NMV) that was approved by Renfrewshire Council on 27 Sept 2023. This is to amend the north-east corner of the Appeal Scheme with a revised BESS layout as shown below and that these battery containers have been approved as part of the NMV to be in signal white colour (RAL 9003). See extracts of approved plans below relating to the NMV.



A subsequent full planning permission (LPA Ref. 23/0224/PP) (under a 'minor' application) was granted on 30 Nov 2023 to vary the original consented scheme by proposing the erection of a new HV Yard and ancillary structures, cable route to the existing substation, relocated site access, and temporary construction compound to the north-west corner of the site as shown below (application site edged in red).



Planning Permission LPA Ref. 23/0224/PP makes clear that the temporary construction compound will be subsequently populated with BESS to align with the previous NMV approval (LPA Ref. 23/0497/NMV). The plan below shows this clearly for context and was submitted as part of application 23/0224/PP.



2.4.2 EIA Criteria and Screening

Regulation 2 (1) of the Town and Country Planning (Environmental Impact Assessment) (Scotland) Regulations (2017) ('the EIA Regulations') defines EIA development as either:

- Schedule 1 Development - development of a type listed in Schedule 1 always requires EIA; or
- Schedule 2 Development - development of a type listed in Schedule 2 requires EIA if it is likely to have significant effects on the environment by virtue of factors such as its nature, size or location.

The Proposed Development is not Schedule 1 Development. Given the nature of this application the Proposed Development would not have significant effects on the environment from its nature, size, or location and this has been confirmed by Renfrewshire Council in December 2023 (application ref: 23/0697/EA) and the Energy Consents Unit in May 2024 (ref: ECU00004988).

3 Site Location and Description

3.1 Site Overview

The Site is wholly located within the administrative area of Renfrewshire Council (RC), on land immediately to the southeast of Gleniffer Road (B775). The location of the Site is shown on **Drawing Number 15957-024** enclosed with this application, with the boundary edged in red.

The Proposed Development is located adjacent to the Neilston Substation, which is part of, and is operated by, the National Grid. Given the close proximity to the substation, lengthy transmission cables will not be required, ensuring efficient connection to the National Grid, avoiding any major infrastructure, minimising connection, and transmission costs.

The Site area comprises of agricultural land (13.8 ha) that lies approximately 400m to the northwest of Sergeantlaw. Notwithstanding this, construction works have already commenced on site for Phase 1 of the Greener Grid Park development (50 MWs). The Phase 1 project is a National Grid Stability Pathfinder Phase 2 contracted project and provides stability support to the National Grid. The vehicular access to the Site would be taken via Gleniffer Road.

3.2 Site Surrounding

The Site is surrounded by agricultural fields and the nearest residential property to the Site is located approximately 1km to the southwest.

There are no identified statutory landscape or ecological designations within the Site boundary or within 1km of the Site. The nearest environmental designation to the Site is 'Boylestone Quarry' a Site of Special Scientific Interest (SSSI) located approximately 3.8km to the east.

4 Proposed Development

4.1 Development Overview

The Proposed Development consists of the formation of an up to 750MW Battery Storage Facility, comprising up to 88 battery storage container blocks and associated infrastructure, storage containers, welfare, diesel generators, CCTV and lighting columns and associated access, internal access roads, hard and soft landscaping, SuDS Basin, perimeter fence and underground grid connection cable. 3D visuals of the s.36 proposal are contained at **Appendix 2** and that these showcases the development with Years 0, 5 and 15 landscaping mitigation.



Individual components would likely require concrete plinth type foundations.

The Site layout plan (**Drawing Number 15957-025**) enclosed with this application shows three phases of development for Neilston GGP:

- Phase 1 – currently under construction.
- Phases 2 – which will see GGP development across the rest of the Site.

The Site boundary for the Proposed Development totals approximately 13.8ha, as shown on Site Layout (**Drawing Number 15957-025**) enclosed with this Application.

Table 4.1 below provides an overview of the development components for the Proposed Development.

Table 4.1 Development Components Summary

Development Component	Scale (m)	Drawing
Type A batteries	Height (H) 3.8 m x Length (L) 26 m x Width (W) 16.18 m	FIGURE: 15957-027
Type B batteries	Height (H) 3.8 m x Length (L) 26 m x Width (W) 16.18 m	FIGURE: 15957-012
Type C batteries	H 3.8 m x L 38 m x W 16.18 m	FIGURE: 15957-013
Stores and Welfare Buildings	H 3.5 m x L 6.2 m x W 3.1 m	FIGURE: 15957-014
Protection and control building & MV Switchgear building	H 3.55 m x L 14.1 m x W 3.7 m	FIGURE: 15957-010
Aux transformer	H 2.5 m x L 3.3 m x W 2.4 m	FIGURE: 15957-009
Diesel generator	H 3.5 m x L 6.2 m x W 3.1 m	FIGURE: 15957-008
Fence	H 3.4 m	FIGURE: 15957-016
MV Room	H 3.8 m x L 26 m x W 16.18 m	FIGURE: 15957-015
HV Yard	H 10.83 m x L 65.7 m W 39.89 m	FIGURE: 15957-011
Underground Water Tank	Depth 1.2 m x L 12 m x W 8 m	FIGURE: 15957-021

4.2 Battery Storage Units

The Proposed Development would consist of various Lithium-Ion (Li-ion) battery storage units, along with associated equipment, including power converters and transformers. This equipment is likely to be housed on a levelled and stoned platform. Individual components could require concrete plinth type foundations, this is dependent on final assessment of ground conditions and the equipment supplier's requirements.

Batteries are a widely accepted and recognised technology in the fight against climate change. Their high energy density and charge/discharge cycle fatigue resistance in comparison to competing technologies and take up far less space. Li-ion batteries have a fast response time which makes them suitable for power application in grid-scale deployment. The battery technology type for the Proposed Development will meet all relevant safety standards and will ensure a high level of performance.

The battery industry is continually evolving, and designs continue to improve, both technically and economically. The most suitable technology can change with time and therefore the final technical choice for the Proposed Development would be made before construction, through a competitive tender process and technical evaluation.

Flexibility has been sought to allow for this competitive tender to fit within the Application design, but the level of flexibility is controlled by proposed planning conditions which the Applicant has suggested within this submission.

Please note that the Site layout (Drawing Number 15957-026) shows the Phase 1 area of BESS currently under construction but is shown for background context only as that relates to a previously approved NMV2 application (Local Planning Authority Ref. 23/0497/NMV).

4.3 High Voltage Transformer Yard

High Voltage Transformers (HV Transformers) are essential components in the electricity supply network responding to the increasing needs for long-distance electricity transmission at high currents from power sources in remote areas with the spread of power demand. HV Transformers play a vital role of offering functions to improve system stability and reliability and reducing power losses to improve power flow over the entire system.

This Application proposes two HV Transformer units which will be up to 10.83 m in height and be located within the HV Transformer Yard on the north-west corner of the Site immediately to the south of B775. An indicative layout design is provided in Drawing 15957-011 as the HV Transformers themselves will be selected prior to construction, through a competitive tender process.

4.4 Associated Infrastructure

The associated infrastructure would comprise the following components:

- Battery and Inverter Skid;
- Stores and Welfare Buildings;
- Protection and control building & MV Switchgear building;
- Auxilliary transformer;
- Diesel generator;
- External fence;
- MV Room maximum development extent/ parameters plan;
- Underground Water Tank;
- Lighting/CCTV columns on poles 6m in height (operated by motion sensor);
- Internal Roads;
- SPT 400kV Compound;
- Protection Control Building;
- SUDS Pond; and
- Access tracks, with an indicative width of 7m.

4.5 Grid Connection Route

The Proposed Development includes for an underground cable which would connect into Neilston substation shown on **Drawing Number 15957-025**. A new cable route is proposed within this Section 36 application which connects the Site's HV Transformer yard to the Neilston substations towards northwest corner, whereas the previously consented cable route was located to the east of Neilston substation.

4.6 Site Access

The Proposed Development would utilise an access point from the B775 (as previously approved under LPA application reference 23/0224/PP). Also shown on the Proposed Site Layout Plan (Drawing Number 15957-026) is a secondary access point off the B775. This is required for emergency access as requested by the Fire and Rescue Service and will therefore not be in day-to-day use. As indicated on

the Proposed Site Layout Plan bollards will be installed in front of this access so no vehicles could ever park in front of it, and it can be used in the event of an emergency.

The design and layout of the Proposed Development accounts for onsite access tracks to ensure easy and safe movement around the Site for construction workers as well as maintenance workers.

All equipment would be secured by a fence surrounding the Proposed Development and would not be accessible to the public.

4.7 Construction Period

The construction phase of the Proposed Development would last for up to 36 months. The estimated construction traffic volume during this period has assumed a 24-month construction programme, resulting in a worst-case scenario increase of 3.1% on the B775 to the north of the Site and 1% to the south. The greatest increase in HGV traffic occurs to the north of the junction where a 36% increase is predicted. The level of traffic impact is not considered significant. Further details on construction traffic can be found in the Construction Traffic Management Plan (ref. 10109339) provided by Pell Frischmann in support of this application.

5 Need For and Benefits of the Proposed Development

5.1 Need for the Development

The UK's electricity grid has historically relied on large, centralised power plants. However, remaining coal power plants are in the process of reducing capacity and will close by 2025. Existing nuclear power plants are reaching the end of their design lives with no new nuclear facilities being planned for Scotland.

There is a requirement to deliver an increasing amount of clean energy through renewable technologies, as acknowledged by the Westminster Government in the Energy White Paper¹. In 2019, the First Minister announced that the climate emergency is at the forefront of the Scottish Government programme² going forward. The 2021 – 22 Programme³ stated:

“Energy and industry must be at the forefront of our progress towards net zero – securing the necessary emissions reductions, while driving investment and innovation in new technologies across the supply chain and, in turn, creating new, good, and green jobs. To help drive that innovation and transition forward, the Scottish Government is investing £2 billion across 2021-22 to 2025-26 in large-scale, low carbon infrastructure.”

Clearly, addressing the climate emergency is a priority issue that extends beyond politics and is a social responsibility that must permeate all industry and development to meet carefully considered and ambitious targets within national and global energy and climate change initiatives.

When it was enacted, the Climate Change (Scotland) Act 2009 set world leading greenhouse gas emissions reduction targets, including a target to reduce emissions by 80% by 2050. However, the Climate Change (Emissions Reduction Targets) (Scotland) Act 2019 amended the 2009 Act and has set the even more ambitious targets.

The Cabinet Secretary for Wellbeing Economy, Net Zero and Energy made a Statement to the Scottish Parliament on 18 April 2024 with regard to the report to the Scottish Parliament prepared by the CCC, ‘Progress in reducing emissions in Scotland’ (March 2024). The Statement focussed on the implications the CCC report contains for Scottish emission reduction targets as set out in legislation, namely as set out in the Climate Change (Scotland) Act 2009. The Statement sets out that the Scottish Government will bring forward expedited legislation to address matters raised by the CCC and this is expected to be a change to the 2030 emissions reduction target.

The CCC produced a report to the Scottish Parliament entitled ‘Progress in reducing emissions in Scotland’ in March 2024. It calls in the report for Scotland’s Climate Change Plan to be published urgently in order that the CCC can assess it and identify the actions which will deliver on its future targets. The press release states that there is a path to Scotland’s post-2030 targets, but stronger action is needed to reduce emissions across the economy. The main report (page 10) states that “The

¹ HM Government December 2020 [Online] Energy White Paper Powering our Net Zero Future – Available at: <https://www.gov.uk/government/publications/energy-white-paper-powering-our-net-zero-future> (Accessed 27/10/2021)

² Scottish Government (2019) *Protecting Scotland’s Future: The Government’s Programme for Scotland 2019-20* [Online] Available at: <https://www.gov.scot/publications/protecting-scotlands-future-governments-programme-scotland-2019-20/> <http://www.legislation.gov.uk/ukpga/1989/29/contents> [Accessed 21/10/2021]

³ Scottish Government – A Fairer, Greener Scotland Programme for Government 2021 – 22 [Online] Available at: <https://www.gov.scot/publications/fairer-greener-scotland-programme-government-2021-22/documents/> (Accessed 27/10/2021)



Scottish Government should build on its high ambition and implement policies that enable the 75% emissions reduction target to be achieved at the earliest date possible.”

Given this national context there is a growing demand by the Transmission Operators and the Distribution Network Operators for a broad range of services such as storage and management. The Proposed Development is designed to support the flexible operation of the National Grid and decarbonisation of electricity supply. This is required for a number of reasons including the Electricity Market Reform, the Capacity Market, and the balancing of the network.

The Atkins Report – Engineering Net Zero – The Race to Net Zero 2020⁴ dispels the myth that the UK can achieve Net Zero without further concerted action in relation to how we generate and distribute electricity. This report quantifies the minimum requirement for new generation of energy to meet Net Zero by 2050 at 250 GW, with the UK system needing between 15 and 30 GW of new storage, during this time.

To put this into perspective, *“the UK currently has 3GW of capacity in pumped storage plus about 1.6GW in batteries. We may need up to ten times this to achieve net zero”*.

As an established technology, the Development will provide a flexible and rapid release of electricity to allow the National Grid to regulate electricity supply and demand without any greenhouse gas emissions. Conversely, the Development will also have the capacity to import electricity quickly when supply outstrips demand.

Furthermore, there is a growing demand by network operators for a broad range of services such as storage and management of inertia and fault levels on the grid. The Proposed Development is designed to support multiple services to enable decarbonisation of electricity supply.

The Proposed Development is a key component in the wider renewable’s diversity mix and in meeting the commitments of the Climate Change Act, as it is designed to support the flexible operation of the National Grid. Given the rapid uptake of onshore wind and other non-synchronous renewable power in Scotland, this Site is essential for the grid to function efficiently. Without this project, there will be significantly greater curtailment of wind power and other intermittent renewables, increased use of flexible fossil generation, lower levels of system security, and higher bills for consumers.

5.1.1 Stability

The transmission system short circuit levels and inertia are falling due to the decline in transmission connected synchronous generation as traditional coal and gas plants are phased out from Britain’s energy system. The inherent intermittent nature in which wind and solar generate (i.e., only when the wind is blowing, and the sun is shining) doesn’t give National Grid Electricity System Operator (NGESO) the same stabilising properties. Therefore, another way is needed to find new providers to help support the system. Grid scale battery storage is a primary solution to this widely recognised issue within Government.

NGESO have identified areas of the transmission network in Scotland where this support is required. One of these areas is the Neilston Substation where this development will connect into.

The Applicant believes that the development of this project at Gleniffer Road (B775) is a strong technical solution that will not only help solve the constraint management issue for NGESO in this area, the proximity to substation (<1km) is a key criterion to provide the stability services effectively. The effectiveness of any proposed solution significantly drops with increasing distance from the key substations which is the reason for the selection of the proposed location for this project.

⁴ SNC Lavalin/Atkins – Engineering Net Zero – The Race to Net Zero July 2020 [Online] Available at: <https://www.snclavalin.com/~media/Files/S/SNC-Lavalin/download-centre/en/report/the-race-to-net-zero.pdf> (Accessed 20/12/2021)



5.1.2 Constraint Management

Rising costs of constraint management and the need for more renewable energy in Scotland and the rest of the UK to meet net Zero Targets has led NGENSO to look at alternative solutions. When renewable energy generators are not needed due to lack of demand or other network issues, they receive payments to stop generating, this is known as ‘constraining-off’ generation.

Batteries can act as a cheaper buffer between generation and supply which stores excess renewable energy generated to ensure that the green energy can be used at a later stage and removes cost implications for the consumer. This helps facilitate more renewable energy onto the grid and improves the energy mix being consumed while saving consumers money. Without solutions such as the one proposed by the Applicant, there are costs to consumers and NGENSO spent over 2 billion⁵ in 2023.

5.1.3 Balancing Mechanism

NGESO has a constant supply of ‘extra power’ available for use when the power required by customers is not equal to the power generated and a reserve supply. The Balancing Mechanism is used to ensure that the network is in balance and reserve power is then used when the network comes under ‘stress’.

When unforeseen demand is put on the network, such as when a large power station suddenly goes offline, then the NGENSO control room needs alternative sources of power. This is achieved from rapid responding facilities such as that proposed by the Applicant which can absorb energy from the grid or release it to the grid as required.

5.1.4 The Capacity Market

Through the Energy Act 2013⁶ the Capacity Market mechanism was introduced to ensure security of electricity supply at the least cost to the consumer. The Proposed Development will participate in the Capacity Market and a number of balancing mechanisms for the NGENSO.

To deliver a supply of secure, sustainable, and affordable electricity, the UK needs not only investment in new generation projects and innovative technologies but to get the best out of existing assets on the network. The Capacity Market aims to deal with both these issues by bringing forward new investment while maximising current generation capabilities.

The Capacity Market aims to balance the difference between demand and supply and to bring forward investment in new generation projects and innovative technologies, in parallel to maximising the utilisation of the existing generation capacity. The Capacity Market operates alongside the electricity market, which is where most participants will continue to earn the majority of their revenues.

5.2 Social and Economic Benefits

The Renfrewshire’s Economic Strategy 2020–2030 sets out the Council’s strategy to meet these economic challenges head on, creating a strong and inclusive economy, with more secure jobs providing fair and better work. This Strategy sets out five foundations for a transformed economy:

- *“Ideas, to be the world’s most innovative economy.*
- *People, to generate good jobs and greater earning power.*
- *Infrastructure, to deliver a major upgrade to the UK’s infrastructure.*
- *Business environment, to be the best place to start and grow a business.*

⁵ National Grid System Balancing Reports [Online] Available at <https://www.nationalgrideso.com/industry-information/industry-data-and-reports/system-balancing-reports>

⁶ Energy Act 2013, C. 32 [Online] Available at: <http://www.legislation.gov.uk/ukpga/2013/32/contents/enacted> [Accessed 21/10/2021]



- *Places, to have prosperous communities across the UK.”*

The Proposed Development would provide economic benefits to the local area, which in turn, although temporary, could support wider employment opportunities with associated jobs e.g. construction industry, supply chain as well as providing more reliability of the electricity network.

The potential social and economic effects generated from the Proposed Development can be categorised as follows:

- **Direct effects:**
 - Direct effects on employment levels (e.g., construction workers) during construction, and to a lesser extent, operation and then decommissioning; and
 - Direct effects on land use within the Site (e.g., loss of agricultural land, core paths) during construction, operation, and decommissioning.
- **Indirect effects:**
 - Indirect effects on economic activity at a regional and local level (e.g., supply chain, multiplier effects, economic stimulus generated from the expenditure of additional employment income) during construction and to a lesser extent, decommissioning; and
 - Indirect effects on the companies’ providing services during construction and decommissioning.
- **Induced effects:** for instance, employment created by the additional spend of wages into the local economy.

Socio-Economics impacts during the construction and decommissioning phases of the Proposed Development would include the temporary creation of employment opportunities, and potential adverse effects on recreational and tourism receptors. However, this is subject to competitive tendering and constrained by the specialist nature of the equipment.

The employment associated with the construction of the Proposed Development would be likely to increase occupancy in nearby hotels and other short-term accommodation, as well as increasing trade in local hospitality establishments. There could be a significant number of hotel bookings during the construction phase, subject to the exact number of construction workers and the length of stay. There are a number of accommodation places in the wider area surrounding the Site which could provide places to stay for construction workers during the construction of the Proposed Development. During the operational phase much of the management of the facility would be undertaken remotely, although specialist jobs would be retained for the maintenance of this and other similar plants.

If this Section 36 consent is granted, one of the greatest economic benefits from this scheme is that the cumulative purpose of the Battery Storage facility is the potential to significantly reduce energy bills in the future. The Proposed Development will make an important contribution to wider efforts to reach net zero and provide stability to the grid system to help balance the varying electricity demands on the grid system. The Proposed Development will additionally provide varying localised socio-economic and environmental benefits.

As set out later in this statement the Proposed Development benefits from support from various energy and planning policy documents and this is considered to carry significant weight in addition to the clear need for the Proposed Development as set out here.

6 Design Considerations

6.1 Summary

The Proposed Development has been designed to be as visually unobtrusive as possible and avoid incursions into more environmentally sensitive areas of the Site. The proposed planting and landscape improvements have been designed to provide visual screening using native species which will integrate the Proposed Development in the wider landscape, enhance the existing landscape character and provide biodiversity net gain.

6.2 Design

Most components of the Proposed Development consist of either exposed electrical infrastructure or stored infrastructure within steel container-style units, while the palisade and electric fencing would match the existing fencing of the National Grid substation adjacent to the Site, as well as the consented Neilston GGP. The Proposed Development would be unobtrusive and in-keeping with the scale and appearance of the consented Neilston GGP. The HV Compound is considered the largest component of the Proposed Development. To ensure the Proposed Development does not result in any adverse landscape and visual impacts out with that already considered as part of planning permission 21/0034/PP, the HV yard has been located in an area of the Site where there are existing trees which will help to minimise visual impacts. Furthermore, the HV yard would be further screened by proposed planting and would be seen in the context of the overall GGP development and the overhead lines which pass through the Site.

The Proposed Development's design seeks achieve an optimised GGP development which will result in a reduced development footprint and reduced environmental impacts. Additionally, the Proposed Development includes a Cable Route from the proposed HV Compound to the National Grid substation, ensuring connectivity between the consented Neilston GGP and the National Grid substation, which is vital to maintain the functionality of the consented Neilston GGP.

The design principles and evolution of the Proposed Development have considered both environmental and physical constraints within the Site and the surrounding area, with further design mitigation measures adopted to protect and enhance the surrounding environment. In doing so, the technical and financial viability of the Proposed Development has been maintained, ensuring that the Greener Grid Park provides grid stability and constraints management to the National Grid, while avoiding adverse impacts on the surrounding environment as a result of its construction and operation.

6.3 Grid Connection

National Grid requires storage developments like this to provide constraint management services to enable more renewables to be developed in Scotland without impacting the transmission system. Battery storage is one of the few technologies capable of providing this type of service to National Grid, and furthermore, the technology can be used for other services such constraint management, balancing services, and system inertia.

The Applicant has accepted a grid offer that will allow the project to be connected to the National Grid in 2027, potentially sooner. This will allow the project to assist in a variety of grid services such as Constraint Management (covered later in Sections 7.1.1 and 7.1.2), offsetting the use of flexible fossil generation, and contributing to cost savings for bill payers much earlier than any alternative solution. This also supports the case for flexibility in planning permission in areas such as micro-siting as there is limited time to consent any minor changes to the proposals.

6.4 Site Selection

The Site is strategically located adjacent to the Neilston substation, which is strongly interconnected at 400kV, 275kV and 132kV to the Scottish Power Transmission network. Stability services operate at their optimum when connected at a 400kV transmission level. It is therefore necessary to balance demand and supply in order to prevent shortages and blackouts. As such, there is a growing demand by National Grid, Electricity System Operator, for a broad range of stability and flexibility services, such as synchronous compensators and energy storage.

The principle of acceptability of the development of a GGP on this Site has previously been established through appeal ref PPA-350-2047 and also detailed within full planning application (ref. 21/0034/PP).

6.5 Access

6.5.1 Access Route to Site

The wider access to the Site remains as set out previously, i.e., from Gleniffer Road (B775), which passes to the west of the Site. Gleniffer Road becomes Stanley Road to the north, past Glenburn, on route to central Paisley. Construction traffic is expected to arrive predominantly from the north initially via the A761. The detailed route from the A761 to the Site will be as follows:

- Leave the A761 southbound on the B774;
- Continue south for approximately 275m before existing the junction right on to Calside;
- Continue on this road for approximately 5km, as it becomes Stanley Road and then Gleniffer Road; and
- At this point, access to the Site will be on the left-hand side.

6.5.2 Site Entrance

All public roads along the route are at least 5 m wide. Road junctions and bends along the route have been assessed to ensure that vehicles will be able to negotiate these safely and enable easier access via larger vehicle such as HGV (length 16.5m, height 3.6m, width 2.5m) to the Site. The presence of the Neilston Substation and its access point in particular restricts the position of the Site entrance, as safety standards require the separation of entrances off the same road.

The Proposed Development within this application includes for moving the Site Entrance approximately 20m to the east of its original consented position. This relocated Site entrance has been designed with consideration to all relevant guidance, with the determination that the proposed entrance is the most suitable and viable access point. The principle of moving the site entrance has already been accepted and approved by the LPA under permission 23/0224/PP.

6.5.3 Emergency Access

An emergency secondary access is proposed to the north-west corner of the site. This will be typically closed and to have bollards and is only intended to be used by emergency vehicles if required. Early engagement with the Local Fire Service confirmed that they would welcome a secondary access for emergency vehicles.

6.5.4 Construction Traffic Management

A Construction Traffic Management Plan (CTMP) has been prepared in support of the Proposed Development. Construction traffic associated with the Proposed Development will follow the measures set out in this CTMP report. The CTMP has proposed the use of traffic management procedures to ensure that there will be no adverse impacts from construction traffic on the road network. The final details of these measures will be determined once the Balance of Plant contractor

has been appointed. Operational traffic is expected to be minimal; due to the GGP Site being predominantly unmanned save for maintenance visits as required. The impact of operational traffic on the wider road network is therefore expected to be negligible.

6.6 Summary

This design considerations section has established the following:

- The design principles and rationale that have been applied to the Proposed Development, including the various relevant environmental and technical criteria;
- The steps taken to appraise the context of the Site, and how the design of the Proposed Development has accounted for context, design iterations, various related environmental and technical constraints, and each design component and its siting;
- The relevant considerations in the form of the proposed Site access within the design of the Proposed Development; and
- All other relevant issues likely to affect access to the Proposed Development, through both construction and operation phases.

The DAS has therefore been established to demonstrate the integrated approach conducted through the design and mitigation measures to achieve a variety of design and access requirements for the Proposed Development.

7 Development Phases

7.1 Construction

The construction process would consist of the following principal activities:

- Site preparation/ laying of any further required hardstanding;
- Erection of temporary and permanent fencing and installation of earthing mat;
- Construction of equipment foundations;
- Offload of equipment and secured onto foundations;
- Mechanical and electrical fit out of equipment;
- Installation of electrical cabling on Site;
- Installation of cabling between the Development and the existing substation;
- Testing and commissioning; and
- Site restoration.

It is likely that these operations would be carried out predominantly in the order identified to minimise the overall length of the construction programme, subject to a detailed construction programme post consent.

Site restoration would be programmed and carried out to allow restoration of disturbed areas as early as possible and in a progressive manner.

Construction of the Proposed Development would generate additional vehicle movements on the local road network during a construction process expected to last for approximately 24 months.

An Outline Construction Traffic Management Plan (CTMP) has been prepared in support of the Application and the Applicant is willing to accept a planning condition requiring an updated Plan to be provided for approval prior to construction works commencing.

7.2 Operation

The facility would be used to import, store and export electricity on demand and as required to support the electrical grid network. The plant would be available to import and export electricity on a 24/7 basis.

During the operational phase, the Proposed Development would be controlled remotely as the facility is fully automated. It would only be necessary for a maintenance engineer to visit the Site on an occasional basis (i.e., monthly routine maintenance visit). As such the operational phase of the project would not generate any significant traffic impacts.

Maintenance activities would generally be undertaken in the summer months when tracks are dry. The attenuation pond would also be regularly maintained to ensure its optimum performance throughout the operational life.

7.3 Security and Lighting

The infrastructure would be located within a secure fenced compound. An alarm receiving company would be appointed to ensure that no one enters the Site when the facility is not occupied, and they will monitor the Site 24/7 and raise any necessary alarms with Site management staff or the local

police. The security system will include a Closed-Circuit TV (CCTV) system, motion sensors, Tannoy system and motion-activated security lights.

To reduce light pollution and running costs, lighting at the Site is to be by motion-sensor and would be kept to a minimum and it would only be used when maintenance staff are present on Site to allow them to safely move around the Site or when triggered by a security breach. Lighting would be low level directional LED lighting with shrouds to prevent upwards light spillage. Lighting would be fitted to CCTV columns as required for safe working.

7.4 Fire Safety

Fire risk within the BESS is managed in a number of ways (in addition to the base chemistry of the battery cells), including software and hardware fail safes. Temperature within each cell of each battery module is monitored by the BESS container monitoring system on a 1/10th second basis and any temperature variation within an individual module outside optimum operating conditions would trigger a response from the air conditioning units. If temperature increase continues or there is a failure of the air-conditioning units, the BESS container would automatically be isolated and shutdown to mitigate against the risk of thermal runaway and fire.

Additionally, to comply with insurance regulations, rows of BESS containers must be separated by a minimum distance to prevent fire spread. Without this conformity, the project would be declined the necessary insurances it requires and would thus not be fundable. The project therefore will adhere to any minimum separation distances imposed by insurance regulators.

BESS systems will be compliant with UL9540A (UL 9540A Test Method For Battery Energy Storage System) which tests the fire safety hazards associated with propagating thermal runaway within battery systems in both cell module and rack level.

7.5 Decommissioning

Decommissioning will take account of the environmental legislation and technology available at the time of decommissioning. Notice will be given to the Council in advance of commencement of the decommissioning works, with all necessary licenses or permits being acquired. Decommissioning will be timed to minimise its environmental impact.

The associated works will be undertaken in accordance with a statement of operations, covering safety and environmental issues during decommissioning and will include removal of electrical equipment, and concrete foundations down to 1m below ground level.

8 Renewable Energy Policy and Legislative Framework

8.1 Introduction

This Chapter refers to the renewable energy policy and emissions reduction legislative framework with reference to relevant international, UK and Scottish provisions. The framework of international agreements and obligations, legally binding targets and climate change global advisory reports is the foundation upon which national energy policy and greenhouse gas emissions (GHG) reduction law is based. This underpins what can be termed the need case for renewable energy from which the Proposed Development can draw a high level of support.

The Proposed Development requires to be considered against a background of material UK and Scottish Government energy and climate policy and legislative provisions, as well as national planning policy and advice. These taken together provide very strong support for battery storage in principle.

It is evident that there is clear and consistent policy support at all levels, from international to local, for the deployment of renewable energy generally, and for storage technologies, to combat the global climate crisis, diversify the mix of energy sources, achieve greater security of supply, and to attain legally binding emissions reduction targets.

The Proposed Development would make a valuable contribution to help Scotland meet its renewable energy and electricity production targets, while supporting emissions reduction to combat climate change in the current climate emergency.

Batteries play a vital role in ensuring the realisation of the full potential capacity of existing and future renewable energy generation, and the successful transition to a net-zero future. Batteries import large amounts of renewable energy from surrounding renewable generators (e.g. wind or solar farms) when supply is typically at its highest and in excess of demand, storing it, and then exporting it back to the grid when demand is high, but supply is low (e.g. still, cloudy days).

UK and Scottish Government renewable energy policy and associated renewable energy and electricity targets are important considerations. It is important to be clear on the current position as it is a fast-moving topic of public policy. The context of international climate change commitments is set out. This is followed by reference to key UK level statutory and policy provisions and then a detailed description of relevant Scottish Government statutory and policy provisions is set out.

8.2 International Commitments

8.2.1 The Paris Agreement (December 2015)

At the Paris Climate Conference (COP21), December of 2015 saw 195 countries adopt the Paris Agreement⁷ within the United Nations Framework Convention on Climate Change, the first ever legally binding global framework for tackling climate change.

The Paris Agreement's fundamental objective is to keep this century's global temperature rise below 20C above pre-industrial levels, and to pursue efforts to limit global warming even further: to 1.5°C.

⁷ United Nations Climate Change - The Paris Agreement (2015) [Online] Available at: <https://unfccc.int/process-and-meetings/the-paris-agreement/the-paris-agreement> (Accessed 22/05/2024)

The UK is legally bound through commitment to the Paris Agreement to reduce GHG emissions and work towards a common, global goal of Net Zero. The UK Government has translated this common goal of moving towards a low carbon economy, into targets for Net Zero for both 2045 (Scotland) and 2050 (UK). The purpose of domestic and renewable energy and GHG reduction targets is to meet the UK's commitment in the Paris Agreement.

8.2.2 UN Emissions Gap Report (2023)

The UN Emissions Gap Report (2023) provides the annual independent science-based assessment of the gap between the pledged GHG reductions, and the reductions required to align with the long-term temperature goal of the Paris Agreement. The report set out that not only have temperature records continued to be broken, but global greenhouse emissions and atmospheric concentrations of carbon dioxide have increased since 2022. The report sets out that energy is the dominant source of GHG emissions, currently accounting for 86% of global CO₂ emissions.

The report (page 1) states *“the world is witnessing a disturbing acceleration in the number, speed and scale of broken climate records. 2023 was the warmest year on record⁸.”*

8.2.3 The Intergovernmental Panel on Climate Change, Sixth Assessment Report Synthesis Report: Climate Change (2023)

The Intergovernmental Panel on Climate Change (IPCC) finalised the Synthesis Report for the Sixth Assessment Report (AR6) during the Panel's 58th Session held in Interlaken, Switzerland from 13 - 19 March 2023.

In August 2021, the first part of the Inter-Governmental Panel on Climate Change ('IPCC') 6th Assessment Report was published, comprising the first major assessment of climate change science since 2013. In February and April 2022 respectively, the second and third parts of the IPCC 6th Assessment Report were released. When outlining new estimates of the potential to reach 1.5°C global warming levels, the 6th Assessment Report concluded this would be unachievable without rapid and extensive Greenhouse Gases ('GHG') reductions.

Ultimately, as mentioned in Section 8.2.3 above, the latest report presents an urgent warning of the detrimental consequences of failing to meet global temperature rise targets and emphasises the absolute necessity of scaling up global climate action to reduce GHG emissions as an immediate priority.

The 6th Assessment Report highlights that immediate short-term acceleration of renewable energy is required if limiting warming below danger levels is to remain feasible. The 6th Assessment report outlines key timescales which explicitly express how transformative this next decade needs to be.

8.2.4 COP 28 (November 2023)

The COP28 took place in Dubai and was the biggest UN Climate Change Conference of its kind in which the UN member parties gathered and agreed on the first 'global stocktake'. A statement released following COP28⁹ calls on the Parties to *“take action towards achieving, at a global scale, a*

⁸ UN Environmental Programme, (2023). Emissions Gap Report 2023 [Online] Available at: <https://www.unep.org/resources/emissions-gap-report-2023> (Accessed 22/08/2024)

⁹ United Nations Climate Change - COP28 Agreement Signals “Beginning of the End” of the Fossil Fuel Era, Available at: <https://unfccc.int/news/cop28-agreement-signals-beginning-of-the-end-of-the-fossil-fuel-era> (Accessed on 10/07/2024)

“tripling of renewable energy capacity and doubling of energy efficiency improvements by 2030.” (emphasis added).

The statement adds:

“The stocktake recognises the science that indicates global greenhouse gas emissions need to be cut 43% by 2030, compared to 2019 levels, to limit global warming to 1.5°C. But it notes parties are off track when it comes to meeting their Paris Agreement goals.”

The COP28 Agreement Signals the “beginning of the end of the fossil fuel era” by laying the ground for a swift, just and equitable transition, underpinned by deep emissions cuts and scaled-up finance. The global stocktake is considered the central outcome of COP28 – as it contains every element that was under negotiation and can now be used by countries to develop stronger climate action plans due by 2025.

8.3 UK Climate Change and Energy Legislation and Policy

8.3.1 The Climate Change Act (2008) & Carbon Budgets

Under the Climate Change Act 2008 (‘the 2008 Act’), the UK committed to a net reduction in GHG emissions of 80% against the 1990 baseline by 2050. That target was extended in June 2019 to at least 100% against the 1990 baseline by 2050 under secondary legislation (with Scotland committing to net zero by 2045).

The 2008 Act also established the Committee on Climate Change (‘the CCC’) which has produced six four-yearly Carbon Budgets (covering 2008 – 2037) and which reports on progress made in reducing GHG emissions to the UK Government. These legally binding carbon budgets act as stepping-stones towards the overarching target of Net Zero by 2050. The CCC advises on the appropriate level of each carbon budget and once accepted by Government, the respective budgets are legislated by Parliament. All six carbon budgets have been put into law and run up to 2037.

Table 8.1 Carbon Budgets and Progress

Budget	Carbon Budget Level	Reduction below 1990 Level	Progress on Budgetary Period
1 st Carbon budget (2008 – 2012)	3,018 MtCO _{2e}	26%	-27%
2 nd Carbon budget (2013 – 2017)	2,782 MtCO _{2e}	32%	-42%
3 rd Carbon budget (2018 – 2022)	2,544 MtCO _{2e}	38% by 2020	48.7% ¹⁰
4 th Carbon budget (2023 – 2027)	1,950 MtCO _{2e}	52% by 2025	n/a
5 th Carbon budget (2028 – 2032)	1,725 MtCO _{2e}	57% by 2030	n/a
6 th Carbon budget (2033 – 2037)	965 MtCO _{2e}	78% by 2035	n/a
7 th Carbon budget (2038 – 2042)	To be set in 2025	-	n/a

¹⁰ This figure is a provisional estimate and will be confirmed later in 2024.

Net Zero Target	100%	By 2050	
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The world leading commitments made in the Sixth Carbon Budget (for a reduction in UK GHG of 78% by 2035 relative to 1990 levels) will require strong Policy action in Scotland and will require much more and faster deployment of renewable energy and storage than has been realised thus far.

8.3.2 The UK Energy White Paper: Powering Our Net-Zero Future (December 2020)

In December 2020, the UK Energy White Paper: Powering Our Net-Zero Future¹¹ ('the White Paper') was published. The White Paper sets out the UK strategy (and thus the measures which will need to be put in place) to clean up its energy system, fight climate change and reach net zero emissions by 2050. The following points are relevant to the Proposed Development:

- Page 43: *"A low-cost consistent system is likely to be comprised predominantly of wind and solar. But ensuring the system is also reliable, means intermittent renewables need to be complemented by technologies which provide power, or reduce demand, when the wind is not blowing, or the sun does not shine. Today this includes nuclear, gas with carbon capture and storage and flexibility provided by batteries, demand side response interconnectors (see 'Energy system' chapter) and short-term dispatchable generation providing peaking capacity, which can be flexed as required".*
- Page 44: *"By 2050, we expect low-carbon options, such as clean hydrogen and long-duration storage to satisfy the need for peaking capacity and ensure security of supply at low cost, likely eliminating the reliance on generation from unabated gas".*
- Page 72: *emphasises the fact that energy storage in batteries will provide "...the flexibility needed to match supply to demand at peak hours, or when renewables output is low', such flexibility will lower future costs for consumers and can be deployed quickly to meet spikes in demand. Page 72 also states 'Increasingly, flexibility will come from new, cleaner sources, such as energy storage in batteries, increased interconnected capacity from neighbouring electricity markets, or from consumer using smart technologies to reduce how much energy they use or shift when they use the energy to different times in the day".*

BESS therefore provides an important additional mechanism within the mix of solar and wind energy and assists in achieving the tandem aims of energy security and stability.

8.3.3 The British Energy Security Strategy (April 2022)

The UK Government released its Energy Security Strategy in April 2022, of which intends to guide planning Policy to accelerate the transition away from hydrocarbons within the energy sectors and roll out new renewables. Building on the government's 'Ten Point Plan for a Green Industrial Revolution', together with the 'Net Zero Strategy' and this Energy Strategy, the UK government is driving an unprecedented private sector investment into clean energy jobs by the end of the decade. Ambitious targets are being set to ensure the rapid decarbonisation of the electricity sector within the UK, with a potential 95% of British electricity potentially being low-carbon by 2030.

11 HM Government (2020) Energy White Paper – Powering our Net Zero Future [Online] Available at: https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/943807/201214_BEIS_EW_P_Command_Paper_LR.pdf (Accessed 22/05/2024)

Networks, storage and flexibility features is a primary area of focus within the Energy Strategy, accelerating the domestic supply of clean electricity and facilitating the network infrastructure to support its increased generation. In this area, of which the Proposed Development sits in, the strategy aims to prioritise;

“anticipating need because planning ahead minimises cost and public disruption; and hyper-flexibility in matching supply and demand so that minimal energy is wasted. This more efficient, locally responsive system could bring down costs by up to £10 billion a year by 2050”.

A flexible and efficient system of electricity transmission and distribution requires increased deployment of BESS and additional electrical infrastructure, such as synchronous compensators. As such the strategy aims to ensure;

“encouraging all forms of flexibility with sufficient large-scale, long-duration electricity storage to balance the overall system by developing appropriate Policy to enable investment”.

The Proposed Development intends to contribute to the objectives set out in the strategy above. The components included within the Proposed Development allows for greater flexibility and stability of electricity demand in tandem with the growth of renewable energy generation within the electrical infrastructure.

8.3.4 Powering up Britain: The Net Zero Growth Plan

On 30 March 2023 the UK Government (Department for Energy Security and Net Zero) published ‘Power Up Britain’ which comprises a series of documents including an Energy Security Plan, Carbon Budget Delivery Plan (CBDP) and Net Zero Growth Plan¹².

Powering Up Britain additionally highlights the need to deliver for the transformation of the electricity network, which is required to manage the anticipated increase in electricity demand as it intends to decarbonise. The Proposed Development provides a flexibility services which enable the grid to rely more on decarbonised electricity generation, moving away from the requirement to call on fossil fuel emitting energy sources during periods of low renewable energy generation.

The CBDP is the means by which the UK Government satisfies Section 14 of the Climate Change Act 2008 to publish proposals and policies for enabling Carbon Budgets 4, 5 and 6 to be met. The CBDP was published in response to the High Court ruling that the Government’s 2021 Net Zero Strategy did not comply with the Climate Change Act. The Government has therefore had to provide a firmer public commitment to its plans, which has resulted in some changes in approach and ambition.

Before, Powering Up Britain was published, the UK Net Zero Strategy¹³ was the most relevant document on net zero targets. The UK Net Zero Strategy was first published in October 2021 and was later updated in April 2022, presents policies and proposals in order to keep the UK on track for meeting its established carbon budgets and the commitments made under the Paris Agreement.

The Net Zero Strategy stated that Britain’s power system *“will consist of abundant, cheap British renewables, cutting edge new nuclear power stations, and be underpinned by flexibility including storage”* (emphasis added). This exemplifies the Government’s recognition that storage and other

¹² HM Government, (2023). Powering Up Britain: The Net Zero Growth Plan [Online] Available at: <https://www.gov.uk/government/publications/powering-up-britain/powering-up-britain-net-zero-growth-plan> (Accessed 23/08/2024)

¹³ HM Government, (2021). Net Zero Strategy: Build Back Greener [Online] Available at: <https://assets.publishing.service.gov.uk/media/6194dfa4d3bf7f0555071b1b/net-zero-strategy-beis.pdf> (Accessed 23/08/2024)



flexible systems will be essential to support the rapid increase in renewable energy generation which is projected.

Additionally, the introduction of the Net Zero Growth Plan states (page 5):

“Energy Security and net zero are two sides of the same coin. The energy transition and net zero are among the greatest opportunities facing this country and we are committed to ensuring that the UK takes advantage of its early mover status. Global action to mitigate climate change is essential to long term prosperity...”

Furthermore *“The government will enable the acceleration of low-carbon flexible technologies and services deployment through: ... Facilitating the deployment of electricity storage”*.

However, it is important to note, that in July 2022 the High Court ruled that the UK Government’s Net Zero Strategy was inadequate and unlawful as it does not set out how the UK’s legally binding carbon budgets will be met. The UK Government had initially intended to appeal the High Court ruling however, in October 2022 it confirmed that it would not be pursuing its appeal. The UK Government was given until March 2023 to update its Net Zero Strategy and provide further information on how its policies would achieve targets set out in the Climate Change Act 2008. This is when Powering Up Britain: The Net Zero Growth Plan was subsequently published by the UK Government in March 2023 to meet the statutory obligations set out under the Climate Change Act 2008, which included CBDP. However, even CBDP was found unlawful by the High Court following a second legal challenge, R (Friends of the Earth & Others) v Secretary of State for Energy Security and Net Zero [2024] EWHC 995 (Admin).

8.3.5 CCC – Report to Parliament (2023)

The CCC published its report to Parliament ‘Progress in Reducing Emissions’ in June 2023. It sets out (page 13) that despite the UK Government having issued the CBDP, *“policy development continues to be too slow and our assessment of the CBDP has raised new concerns. Despite new detail from Government, our confidence in the UK meeting its medium-term targets has decreased in the past year”*.

The CCC adds that:

“At COP26, the UK made stretching 2030 commitments in its Nationally Determined Contribution (NDC) – now only 7 years away. To achieve the NDC goal of at least a 68% fall in territorial emissions from 1990 levels, the rate of emissions reduction outside the power sector must almost quadruple. Continued delays in policy development and implementation mean that the NDCs achievement is increasingly challenging”.

Key messages include (pages 14 and 15):

- A lack of urgency – the CCC note that the net zero target was legislated in 2019 but there remains a lack of urgency over its delivery. It states, *“the net zero transition is scheduled to take around three decades, but to do so requires a sustained high intensity of action. This is required all the more, due to the slow start to policy development so far. Pace should be prioritised over perfection”*.
- Planning policy needs radical reform to support net zero – the CCC state that in this regard that: *“In a range of areas, there is now a danger that the rapid deployment of infrastructure required by the Net Zero transition is stymied or delayed by restrictive planning rules. The*

planning system must have an overarching requirement that all planning decisions must be taken given full regard to the imperative of Net Zero”.

8.3.6 UK Battery Strategy (2023)

The UK Government published the UK Battery Strategy on 26 November 2023. The Strategy brings together Government activity to achieve a globally competitive battery supply chain by 2030 that supports economic prosperity and the net zero transition in the UK.

In summary, the Government’s vision is for the UK to continue to grow a thriving battery innovation system and to become a world leader in sustainable design, manufacture and use.

The Strategy was developed with the UK Battery Strategy Task Force, drawing upon a call for evidence and engagement with business and stakeholders. The Strategy is based around the ‘design, build, sustain’ approach and through the strategy sets the key objectives that the UK will:

- Design and develop batteries for the future;
- Strengthen the resilience of UK manufacturing supply chains; and
- Enable the development of a sustainable battery industry.

In the foreword to the document, the Minister of State for Industry and Economic Security at the Department of Business and Trade states that (page 3):

“Batteries will play an essential role in our energy transition and our ability to successfully achieve net zero by 2050.”

Batteries are seen as key to the net zero transition as they enable more flexible use of energy such as maximising use of intermittent low carbon generation.

8.4 Scottish Climate Change and Renewable Energy Legislation and Policy

8.4.1 Scottish Energy Strategy: The Future of Energy in Scotland (2017)

The Scottish Energy Strategy (SES) was published in December 2017¹⁴. The SES preceded the important events and publications referred to above but nevertheless sets out that 50 % of energy from renewable sources is to be attained by 2030. The SES did not and could not take account of what may be required in terms of additional renewable generation capacity to attain the new legally binding ‘Net Zero’ targets, so it is out of date in that respect. The SES refers to “*Renewable and Low Carbon Solutions*” as a strategic priority (page 41) and states “*we will continue to champion and explore the potential of Scotland’s huge renewable energy resource, its ability to meet our local and national heat, transport and electricity needs – helping to achieve our ambitious emissions reduction targets*”.

8.4.2 The Climate Change (Emissions Reduction Targets) (Scotland) Act (2019)

The Climate Change (Emissions Reduction Targets) (Scotland) Act 2019¹⁵ sets targets for the reduction of Scotland’s emission of all GHG to net-zero by 2045, in doing so amending the Climate Change (Scotland) Act 2009. When it was enacted, the Climate Change (Scotland) Act 2009 set world leading greenhouse gas emissions reduction targets, including a target to reduce emissions by 80 % by 2050.

¹⁴ Scottish Government, (2017) Scottish Energy Strategy: The Future of Energy in Scotland [Online] Available at: <https://www.gov.scot/publications/scottish-energy-strategy-future-energy-scotland-9781788515276/> (Accessed 23/08/2024)

¹⁵ Scottish Parliament (2019) The Climate Change (Emissions reduction Targets) (Scotland) Act 2019 [online] Available at: <https://www.legislation.gov.uk/asp/2019/15/enacted> (Accessed 23/05/2024)

However, the Climate Change (Emissions Reduction Targets) (Scotland) Act 2019 amended the 2009 Act and has set the even more ambitious targets.

The Cabinet Secretary for Wellbeing Economy, Net Zero and Energy made a Statement to the Scottish Parliament on 18 April 2024 with regard to the report to the Scottish Parliament prepared by the (CCC, 'Progress in reducing emissions in Scotland' (March 2024)). The Statement focussed on the implications the CCC report contains for Scottish emission reduction targets as set out in legislation, namely as set out in the Climate Change (Scotland) Act 2009. The Statement sets out that the Scottish Government will bring forward expedited legislation to address matters raised by the CCC and this is expected to be a change to the 2030 emissions reduction target.

The Proposed Development would support the decarbonisation of the electricity network which will subsequently assist these emission reduction targets.

8.4.3 The Update to the Climate Change Plan (2018-2032) (December 2020)

The Scottish Government published an update to the 2018 Climate Change Plan: Securing a Green Recovery on a Path to Net Zero¹⁶ ('the CCP Update') in December 2020. The CCP Update responds to the new net zero targets aimed at ending Scotland's contribution to climate change by 2045 and therefore covers the period throughout which the Scottish Government committed to reduce greenhouse gas emissions by 75% (by 2030) and 90% (by 2040).

The plan sets out the approach to delivering a green recovery, and a pathway to meeting world leading climate change targets for the period from publication to 2032. Amongst other things, the CCP Update states at Page 18 that *"our electricity system will have deepened its transformation for the better, with over 100% of Scotland's electricity demand being met from renewable sources... There will also be a substantial increase in renewable generation, particularly through new offshore and on shore wind capacity"*.

In Chapter 1 when addressing electricity, the CCP Update recognises that as Scotland transitions to net zero, a growing and increasingly decarbonised electricity sector *"is critical to enabling other parts of our economy to decarbonise – notably transport, buildings and industry"*. Also outlined is a vision for the *"development of between 11 and 16 GW of capacity"* of renewable energy generation by 2032. Whilst much of Scotland's electricity generation has decarbonised over the last decade, there is a need for increased investment in renewable energy, particularly onshore and offshore wind. Onshore grid storage will be required for offshore and onshore wind turbines and as such, the Proposed Development would be of benefit to accommodate excess energy storage.

Planning is recognised in the CCP Update as a key delivery mechanism for *"rapid renewables deployment in Scotland"* and will be for many of the policies within the Climate Change Plan update, across all sectors. Ensuring the correct choices are made regarding where and what development should be permitted in the future will help to reduce emissions whilst improving communities' wellbeing and the quality and resilience of Scotland's places.

8.4.4 CCC, Progress in reducing emissions in Scotland Report to Parliament (2022)

2.4.6 The report from the CCC published in December 2022 addresses Scotland's progress in emissions reduction. The report is specifically referenced in the Inquiry Report for the Corriegarth Wind Farm Extension, which was prepared by Reporters (21 August 2023) and which informed the

16 Scottish Government (2020) Securing a green recovery on a path to net zero: climate change plan 2018–2032 – update [Online] Available at: <https://www.gov.scot/publications/securing-green-recovery-path-net-zero-update-climate-change-plan-20182032/> (Accessed 28/05/2024)



decision on the proposal by the Scottish Ministers (20 December 2023). At paragraph 128 of the Inquiry Report, the Reporters state that with regard to the CCC report it “includes several findings that are relevant to this application”. The Reporters then note the following from the report:

- Scotland met its 2020 target because of the impact of the Covid-19 pandemic.
- To date, Scotland has missed 7 out of its 11 annual targets.
- There is a significant risk of the remaining annual targets for 2020s being missed.
- A stepped change in action across all sectors of the economy will be required.
- If targets for the 2020s and early 2030s are not met, there will require to be compensatory overperformance against the later targets; and
- It is not yet clear how much overperformance would be required in that later period.

The Reporters go on at paragraph 129 to state:

“On the basis of those findings, together with NPF4 Policy 1 on giving significant weight to the climate crisis, we conclude that the fact the proposed development would contribute towards reducing Scotland’s greenhouse gas emissions, and achieving its targets thereon, should be given significant weight in the planning balance for this case.”

8.4.5 Draft Energy Strategy and Just Transition Plan (2023)

The Scottish Government published a new Draft ‘Energy Strategy and Just Transition Plan’ entitled ‘Delivering a fair and secure zero carbon energy system for Scotland’ on 10 January 2023. The new Strategy is to replace the one previously published in 2017. The consultation period ended in April 2023. As a draft document it can only be afforded limited weight. The draft document is however consistent with the adopted policy set out in NPF4 and the identification of the 2020s as a crucial decade for the large scale delivery of renewable energy projects supporting urgent transition to net zero.

The Ministerial Foreword states:

“The imperative is clear: in this decisive decade, we must deliver an energy system that meets the challenge of becoming a net zero nation by 2045, supplies safe and secure energy for all, generate economic opportunities, and builds a just transition...”

The delivery of this draft Energy Strategy and Just Transition Plan will reduce energy costs in the long term and reduce the likelihood of future energy cost crises....

It is also clear that as part of our response to the climate crisis we must reduce our dependence on oil and gas and that Scotland is well positioned to do so in a way that ensures we have sufficient, secure and affordable energy to meet our needs, to support economic growth and to capture sustainable export opportunities....

For all these reasons, this draft Strategy and Plan supports the fastest possible just transition for the oil and gas sector in order to secure a bright future for a revitalised North Sea energy sector focused on renewables.”

The Foreword adds that the draft Strategy sets out key ambitions for Scotland’s energy future including:

- More than 20 GW of additional renewable electricity on and offshore by 2030;
- Accelerated decarbonisation of domestic industry, transport and heat;

- Generation of surplus electricity, enabling export of electricity and renewable hydrogen to support decarbonisation across Europe;
- Energy security through development of our own resources and additional energy storage; and
- A just transition by maintaining or increasing employment in Scotland’s energy production sector against a decline in North Sea production.

The draft Strategy states (page 7, Executive Summary) that the vision for Scotland’s energy system is:

“...that by 2045 Scotland will have a flourishing, climate friendly energy system that delivers affordable, resilient and clean energy supplies for Scotland’s households, communities and business. This will deliver maximum benefit for Scotland, enabling us to achieve a wider climate and environmental ambitions, drive the development of a wellbeing economy and deliver a just transition for our workers, businesses, communities and regions.

In order to deliver that vision, this Strategy sets out clear policy positions and a route map of actions with a focus out to 2030”.

Recognition of the role of Battery Storage

With regard to the potential of battery storage the Draft Strategy recognises:

“Batteries can be combined to provide energy storage: In a domestic setting supporting the energy efficiency of individual homes; In communities and neighbourhoods, supporting the energy efficiency of the local low energy network; In strategic locations and through aggregating a large number of fixed and vehicle batteries to support regional energy and grid balancing a high energy network”.

Furthermore, it adds:

“Utility scale battery storage offers fast responding, dispatchable power when required. As of September 2021, only 124 MW of the total 864 MW of energy storage was provided by Battery Energy Storage Systems (BESS) capacity installed in Scotland. However, there is a further 2.1GW that has secured planning permission. Typically, these systems use lithium-ion technology, and only contain energy to dispatch full power continuously for a short number of hours. They also provide a number of ancillary services required to maintain stability within the electricity networks”. (Page 130).

The Draft Strategy reiterates the support for energy storage set out in NPF4 (page 130).

The Draft Strategy further recognises the potential contribution BESS can make to achieving net zero in summarising the key areas where it is considered that the UK Government needs to take action to support the delivery of the strategy with particular regard to energy system flexibility stating: *“We urge the UK Government to make ancillary markets more accessible for Battery Energy Storage Systems (BESS) and other low carbon technologies ahead of fossil fuel powered alternatives”.*

It further adds with regard to constraint costs that the Government will continue to work with National Grid ESO, transmission owners and Ofgem *“to explore opportunities to accelerate planned network investment to relieve constraints”.*

Therefore, a key aspect of the Draft Energy Strategy in terms of network investment is the need for speed of delivery of infrastructure to ensure not only that need can be met, but that there can be energy security and resilience within the wider energy system.

8.4.6 Current Progress in Scottish Emission Reduction Targets

The Scottish Government publishes an annual report that sets out whether each annual emissions reduction target has been met. In their 2024 Progress in Reducing Emissions in Scotland report¹⁷, the CCC stated that Scotland has missed its annual emission reduction targets eight times and Scotland has only met its emissions reduction target once. This was in 2020, during which lockdown restrictions severely reduced commercial, industrial and transport emissions.

The related CCC press release of the same date (2024) states that Scotland's 2030 climate goals are no longer credible. It states:

“Continued delays to the updated Climate Change Plan and further slippage in promised climate policies mean that the Climate Change Committee no longer believes that the Scottish Government will meet its statutory 2030 goal to reduce emissions by 75%. There is no comprehensive strategy for Scotland to decarbonise towards Net Zero.

The Scottish Government delayed its draft Climate Change Plan last year despite the 2030 target being only six years away. This has left a significant period without sufficient actions or policies to reach the target; the required acceleration in emissions reduction in Scotland is now beyond what is credible.”

The CCC calls in the report for Scotland's Climate Change Plan to be published urgently in order that the CCC can assess it and identify the actions which will deliver on its future targets.

The press release states that there is a path to Scotland's post-2030 targets, but stronger action is needed to reduce emissions across the economy.

In light of this CCC report, the Cabinet Secretary made a statement to the Scottish Parliament on 18 April 2024 entitled 'Climate Change Committee Scotland Report – Next Steps: Net Zero Secretary Statement'.

The key points in the statement include:

- The Scottish Government has an *“unwavering commitment to ending our contribution to global emissions by 2045 at the latest, as agreed by Parliament on a cross-party basis”*.
- The Cabinet Secretary states that she is *“announcing a new package of climate action measures which we will deliver with partners to support Scotland's transition to net zero”* and the Statement goes out to reference these specific measures.
- The Statement states sets out that in terms of the policies for these measures that *“they sit alongside extensive ongoing work that will be built upon through our next Climate Change Plan and Green Industrial Strategy.”*
- The Cabinet Secretary states that, *“The Climate Change Committee is clear that the ‘UK is already substantially off track for 2030’ and achieving future UK carbon budgets ‘will require a sustained increase in the pace and breadth of decarbonisation across most major sectors’.* Indeed, we do see climate backtracking at UK level.”

The Cabinet Secretary adds:

¹⁷ Climate Change Committee, (2024). Progress in reducing emissions in Scotland – 2023 [Online] Available at: <https://www.theccc.org.uk/publication/progress-in-reducing-emissions-in-scotland-2023-report-to-parliament/> (Accessed 23/08/2024)

“And with this in mind, I can today confirm that, working with Parliament on a timetable, the Scottish Government will bring forward expedited legislation to address matters raised by the CCC and ensure our legislative framework better reflects the reality of long term climate policy making.”

The last reference in the Statement (as set out above) is key, namely that the Scottish Government intends to work with Parliament to amend existing legislation. This is anticipated to be a change from the current 75% emissions reductions target by 2030 to a lower figure, possibly around 65% to match the UK position.

A further key point in the Statement is that the Scottish Government has reiterated its commitment to achieving net zero by 2045. It would seem therefore that the proposed approach to dealing with the position set out by the CCC in relation to the 2030 target being unachievable, is to amend the emissions reduction target for 2030 such that it better reflects reality and move to a multi-year carbon budget approach to measuring emissions reduction (instead of annual targets) which would bring the Scottish Parliament in line with the Welsh and UK approaches. There is as yet, no clarity on what the new target will be, however it will remain a ‘stepping stone’ en route to achieving the net zero legally binding target by 2045.

Furthermore, in the CCC’s May 2024 letter to Scottish Government advising on the approach to carbon budgets they recommended 5 yearly approach in line with UK and Wales. Among the key messages is:

“The Committee strongly urges the Scottish Government to act quickly to implement a new legal framework, bringing its approach in line with the other nations of the UK. This is crucial to restore confidence and avoid a vacuum of ambition around Net Zero.”

It is considered that the Proposed Development is very strongly supported by the climate change and renewable energy policy and legislative framework and will help Scotland reach these targets and obligations laid out within the national and international framework.

9 UK and Scotland Planning and Energy Policy

9.1 National Planning Policy - National Planning Framework 4

9.1.1 Adoption of NPF4

The Scottish Parliament approved NPF4 on 11th January 2023 and it was formally adopted by the Scottish Ministers on 13th February 2023.

NPF4 forms part of the statutory Development Plan and replaced National Planning Framework 3 (NPF3) and Scottish Planning Policy (SPP).

Certain parts of the 1997 Planning Act have been put into effect in response to the adoption of NPF4. In particular, Section 13 of the Town and Country Planning (Scotland) Act amends Section 24 of the 1997 Planning Act to provide that: *“In the event of any incompatibility between a provision of the National Planning Framework and a provision of a local development plan, whichever of them is the later in date is to prevail”*. Included in this is where an LDP is silent on an issue that is now provided for in NPF4. In the case of the Proposed Development, no significant incompatibilities were found between RLDP2 and NPF4.

9.1.2 Applying/Using NPF4

NPF4 is a long-term plan which sets out where development and infrastructure is needed across Scotland up to 2045. In the ministerial foreword NPF4, Tom Arthur MSP states, amongst other things, that *“putting the twin global climate and nature crises at the heart of our vision for a future Scotland will ensure the decisions we make today will be in the long-term interest of our country”*.

Furthermore, when explaining how the plan is to be used, it is stated in Annex A of NPF4 that *“we must embrace and deliver radical change so we can tackle and adapt to climate change, restore biodiversity loss, improve health and wellbeing, reduce inequalities, build a wellbeing economy and create great places”*.

The plan is intended to guide and manage the spatial development and use of land in the public interest, set out national planning policies, designate national developments and highlight regional spatial priorities for the country.

Centralised development management policies are introduced in NPF4 which are to be applied Scotland wide (see Section 9.2.2.3). Furthermore, guidance is also offered to Planning Authorities regarding the content and preparation of ‘new style’ LDPs.

NPF4 is also required by law to contribute to six outcomes (Annex A of NPF4) linked to, amongst other things, *“meeting any targets relating to the reduction of emissions of greenhouses gases”*.

9.1.2.1 The National Spatial Strategy for Scotland 2045

Part 1 of NPF4 outlines the National Spatial Strategy for Scotland 2045 (NSS) which has been developed based on six spatial principles to support the planning and delivery of:

- ‘Sustainable Places’: *“where we reduce emissions, restore and better connect biodiversity”*;
- ‘Liveable Places’: *“where we can all live better, healthier lives”*; and
- ‘Productive places’: *“where we have a greener, fairer and more inclusive wellbeing economy”*.

The NSS recognises the urgency of addressing climate change, particularly when stating that *“the world is facing unprecedented challenges. The global climate emergency means that we need to reduce greenhouse gas emissions and adapt to the future impacts of climate change”* (emphasis added).

Of particular relevance to the Proposed Development is the aim to deliver “sustainable places”. When discussing the NSS with regard to delivering sustainable places, the Scottish Government highlight how, by 2030 we must have made significant progress towards reaching net zero emissions by 2045.

Furthermore, the headline of the NSS for “sustainable places” is outlined as follows:

“Scotland’s future places will be net zero, nature-positive places that are designed to reduce emissions and adapt to the impacts of climate change, whilst protecting, recovering and restoring our environment”.

The Scottish Government continue in the NSS for “sustainable places” to emphasise that:

“Meeting our climate ambition will require a rapid transformation across all sectors of our economy and society. This means ensuring the right development happens in the right place.

Every decision on our future development must contribute to making Scotland a more sustainable place. We will encourage low and zero carbon design and energy efficiency, development that is accessible by sustainable travel, and expansion of renewable energy generation”.

When describing 'Cross-cutting Outcome and Policy Links' with regard to reducing greenhouse gas emissions, NPF4 expresses how *“the global climate emergency and the nature crisis have formed the foundations for the spatial strategy as a whole. The regional priorities share opportunities and challenges for reducing emissions and adapting to the long-term impacts of climate change, in a way which protects and enhances our natural environment”.*

By explicitly asserting that the climate emergency and nature crisis underpin the whole NSS, NPF4 positions these as essential to the outcomes of almost all of the document’s policies.

9.1.2.2 National Developments

As part of the NSS, NPF4 identifies a total of 18 National Developments (NADs) (6 for each of the 3 delivery themes mentioned above), which are defined as:

“significant developments of national importance that will help to deliver the spatial strategy. ...Their designation means that the principle of the development does not need to be agreed in later consenting processes” (pg. 97).

NPF4 discusses the 18 NADs in turn, as well as their related Statements of Need, at Annex B. The third of the 6 NADs defined to support the delivery of sustainable places is Strategic Renewable Electricity Generation and Transmission Infrastructure (NAD 3) and is described in Annex B as follows:

“This national development supports renewable electricity generation, repowering, and expansion of the electricity grid.

A large and rapid increase in electricity generation from renewable sources will be essential for Scotland to meet its net zero emissions targets. Certain types of renewable electricity generation will also be required, which will include energy storage technology and capacity, to provide the vital services, including flexible response, that a zero carbon network will require. Generation is for domestic consumption as well as for export to the UK and beyond, with new capacity helping to decarbonise heat, transport and industrial energy demand. This has the potential to support jobs and business investment, with wider economic benefits.

The electricity transmission grid will need substantial reinforcement including the addition of new infrastructure to connect and transmit the output from new on and offshore capacity to consumers in Scotland, the rest of the UK and beyond. Delivery of this national development will be informed by market, Policy and regulatory developments and decisions".

Annex B defines all forms of electricity generation exceeding 50 MW capacity as National Development, in locations across all of Scotland. In terms of the need for such development the NPF4 states:

"Additional electricity generation from renewables and electricity transmission capacity of scale is fundamental to achieving a net zero economy and supports improved network resilience in rural and island areas".

Exceeding the 50 MW threshold for constituting as NAD 3, with an installed capacity of more than 200 MW, the Proposed Development can be considered of national importance for the delivery of the NSS. The Proposed Development will significantly contribute to energy targets through the generation of renewable energy for the country.

9.1.2.3 National Planning Policy

Part 2 of NPF4 uses the three identified delivery themes (sustainable, liveable and productive places) to group the national planning policies. With regard to the application of the national levels policies, NPF4 states:

"The Policy sections are for use in the determination of planning applications. The policies should be read as a whole. Planning decisions must be made in accordance with the development plan, unless material considerations indicate otherwise. It is for the decision maker to determine what weight to attach to policies on a case by case basis. Where a Policy states that development will be supported, it is in principle, and it is for the decision maker to take into account all other relevant policies".

The NPF4 contains various policies of relevance and, as aforementioned, is the primary consideration for the determination of the Proposed Development. Falling under the delivery theme of 'sustainable places', the policies relevant to the Proposed Development are as follows:

- Policy 1: Tackling the Climate and Nature Crisis;
- Policy 3: Biodiversity;
- Policy 4: Natural Places;
- Policy 5: Soils;
- Policy 6: Forestry, Woodland and Trees;
- Policy 7: Historic Assets and Places;
- Policy 8: Green Belt; and
- Policy 11: Energy.

For the consideration of BESS development, Policy 11 is the lead Policy. Policy 1 is also considered as very relevant, however, as it gives significant weight to the global climate emergency in order to ensure that it is recognised as a priority in all plans and decisions.

A summary of the relevant provisions of the above policies as well as an assessment of the Proposed Development against these is detailed below.

Policy 1: Tackling the Climate and Nature Crisis

A significant shift in the Policy context under which national planning Policy has been prepared is exemplified through Policy 1 in NPF4.

Policy 1 directs that that “*significant weight*” should be given to the matters of the climate change emergency and nature crisis when considering “*all development proposals*” (emphasis added) and the Policy intent is “*to encourage, promote and facilitate development that addresses the global climate emergency and nature crisis*”.

By making this the first Policy in NPF4, its Policy Intent (above) and Policy Outcome of “*Zero carbon, nature positive places*” are re-positioned as a priority of the document, and for all plans and planning decisions.

The Climate and Nature Crises (the twin Crises) have undoubtedly been placed front and centre of NPF4 and of how planning is expected to operate, which has never before been the case in national planning Policy. Planning Policy no longer leaves the judgement of how much weight should be afforded to the climate emergence solely to the decision maker, thus, the Proposed Development should be given significant weight in response to its contribution to meeting energy targets and reaching Net Zero.

Policy 3: Biodiversity

The Policy Intent for Policy 3 is “*to protect biodiversity, reverse biodiversity loss, deliver positive effects from development and strengthen nature networks*”.

Policy 3 requires proposals to contribute to the enhancement of biodiversity through development and to also, where possible, integrate nature-based solutions. For proposals of national or major scale, or for development which requires an EIA, support will only be granted where it is demonstrated that “*the proposal will conserve, restore and enhance biodiversity, including nature networks so they are in a demonstrably better state than without intervention*” (emphasis added).

The Policy sets out the following criteria which development proposals of national or major scale, or which require EIA, are required to illustrate:

- i. “*the proposal is based on an understanding of the existing characteristics of the Site and its local, regional and national ecological context prior to development, including the presence of any irreplaceable habitats;*
- ii. “*wherever feasible, nature-based solutions have been integrated and made best use of;*
- iii. “*an assessment of potential negative effects which should be fully mitigated in line with the mitigation hierarchy prior to identifying enhancements;*
- iv. “*significant biodiversity enhancements are provided, in addition to any proposed mitigation. This should include nature networks, linking to and strengthening habitat connectivity within and beyond the development, secured within a reasonable timescale and with reasonable certainty. Management arrangements for their long-term retention and monitoring should be included, wherever appropriate; and*
- v. “*local community benefits of the biodiversity and/or nature networks have been considered*”.

Policy 3 does not however set any specific targets or offer advice on what constitutes as acceptable biodiversity gain or “*significant enhancements*”, instead it is stated that “*best practice assessment methods should be used*”. Guidance is undoubtedly required on this matter and the Scottish Government set out draft planning guidance on the implementation of biodiversity which was published in November 2023. However until such a point when this guidance is formally adopted,



there remains some uncertainty around how biodiversity gain is approached, and the assessment of the matter will be one left down to the judgement of the decision maker.

Policy 4: Natural Places

The Policy Intent for Policy 4 is *“to protect, restore and enhance natural assets making best use of nature-based solutions”* and the Policy Outcomes are that natural places are *“protected and restored”* and natural assets are *“managed in a sustainable way that maintains and grows their essential benefits and services”*.

Policy 4a) underlines how development proposals which will unacceptably impact the natural environment will not be supported.

With regards to nationally important designations, development proposals should not compromise the overall integrity or objectives of said areas or any significant adverse effects must be clearly outweighed by social, environmental or economic benefits of national importance (Policy 4c)). With regards to significant adverse effects on local designations, development proposals should not compromise the integrity of said area or the qualities for which it has been identified. If they do, for local designations, the social, environmental or economic benefits of the proposal must be of *“at least local importance”* (Policy 4d)).

Policy 4 states that *“the precautionary principle will be applied in accordance with relevant legislation and Scottish Government guidance”* and explains how if adverse effects on species protected by legislation occur, proposals will not be supported unless they meet the relevant statutory tests.

Policy 5: Soils

The Policy Intent of Policy 5 is *“to protect carbon-rich soils, restore peatlands and minimise disturbance to soils from development”*.

Policy 5 states that for development proposed on peatland, carbon-rich soils or priority peatland habitat, a detailed Site-specific assessment is required to identify the baseline (including depth, habitat condition, quality and stability of carbon rich soils), likely effects (including on soil disturbance) and net effects (on climate emissions and loss of carbon).

Policy 5c) defines renewable energy proposals as one of the few types of development which will be supported, in principle, on peatland, carbon-rich soils and priority peatland habitat.

Policy 6: Forestry, Woodland and Trees

The Policy Intent of Policy 6 is *“to protect and expand forests, woodland and trees”*.

Policy 6 states that development proposals will not be supported where there will be:

- i. *“Any loss of ancient woodlands, ancient and veteran trees, or adverse impact on their ecological condition;*
- ii. *Adverse impacts on native woodlands, hedgerows and individual trees of high biodiversity value, or identified for protection in the Forestry and Woodland Strategy;*
- iii. *Fragmenting or severing woodland habitats, unless appropriate mitigation measures are identified and implemented in line with the mitigation hierarchy;*
- iv. *Conflict with Restocking Direction, Remedial Notice or Registered Notice to Comply issued by Scottish Forestry.”*

The Policy demonstrates how proposals which include woodland removal will not be supported unless they *“will achieve significant and clearly defined additional public benefits in accordance with relevant*

Scottish Government Policy on woodland removal” and, furthermore, highlights the likelihood of compensatory planting to be required for proposals where woodland is removed.

Policy 7: Historic Assets and Places

The Policy Intent of Policy 7 is *“to protect and enhance historic environment assets and places, and to enable positive change as a catalyst for the regeneration of places”* and the first of the three Policy Outcomes is that *“the historic environment is valued, protected, and enhanced, supporting the transition to net zero and ensuring assets are resilient to current and future impacts of climate change”*.

Part a) of Policy 7 is as follows:

“Development proposals with a potentially significant impact on historic assets or places will be accompanied by an assessment which is based on an understanding of the cultural significance of the historic asset and/or place. The assessment should identify the likely visual or physical impact of any proposals for change, including cumulative effects and provide a sound basis for managing the impacts of change”.

With regards to proposals which affect conservation areas, development will only be supported where the character and appearance of the conservation area and its setting is preserved or enhanced.

Development proposals affecting scheduled monuments will only be supported where direct impacts and significant adverse impacts on the integrity of its setting are avoided, or, where exceptional circumstances have been demonstrated and effects are minimised.

Policy 7 requires, where feasible, for non-designated historic environment assets and their settings to be protected and preserved in situ.

Developers must provide an evaluation of any potential non-designated buried archaeological early on in proposal, and where impacts cannot be avoided, they should be minimised.

Policy 8: Green Belt

This Policy intends to encourage, promote, and facilitate compact urban growth which also includes sustainable use of land around towns and cities. Only the developments listed within this Policy would be supported within the Green Belt which includes renewable energy developments. However, any supported development within the Green Belt would also need to meet the following requirements:

- *“reasons are provided as to why a green belt location is essential and why it cannot be located on an alternative Site outwith the green belt;*
- *the purpose of the green belt at that location is not undermined;*
- *the proposal is compatible with the surrounding established countryside and landscape character;*
- *the proposal has been designed to ensure it is of an appropriate scale, massing and external appearance, and uses materials that minimise visual impact on the green belt as far as possible; and*
- *there will be no significant long-term impacts on the environmental quality of the green belt.”*

Policy 11: Energy

The Policy Intent for Policy 11 – the principal Policy for the Proposed Development – is to *“encourage, promote and facilitate all forms of renewable energy development”* including *“energy generation,*

storage, new and replacement transmission and distribution infrastructure and emerging low-carbon and zero emissions technologies including hydrogen and carbon capture utilisation and storage (CCUS)". The Policy Outcomes consist of the "expansion of renewable, low carbon and zero emission technologies".

Policy 11 states how "proposals for all forms of renewable, low-carbon and zero emissions technologies will be supported" (emphasis added) with the only exception to this being wind farms development in National Parks and National Scenic Areas. The first paragraph of the Policy therefore expressly supports wind farm development (other than in the aforementioned circumstances), exemplifying a fundamental shift from the SPP's approach to wind developments.

Policy 11 also affirms that "significant weight will be placed on the contribution of the proposal to renewable energy generation targets and on greenhouse gas emissions reduction targets" (emphasis added). This illustrates a further departure from SPP in that decision makers are now specifically instructed to attribute significant weight to generation and emission targets moving forward. Substantial Policy support has been introduced for larger scale renewable energy developments as NPF4 explicitly recognises the importance of hitting national targets to combat climate change.

An emphasis is placed on economic benefits of energy proposals in Policy 11 c) as it is illustrated that proposals will not be supported unless they "maximise net economic impact, including local and community socio-economic benefits such as employment, associated business and supply chain opportunities".

Policy 11 also states the following:

"d) Development proposals that impact on international or national designations will be assessed in relation to Policy 4.

e) In addition, project design and mitigation will demonstrate how the following impacts are addressed:

- i. impacts on communities and individual dwellings, including, residential amenity, visual impact, noise and shadow flicker;*
- ii. significant landscape and visual impacts, recognising that such impacts are to be expected for some forms of renewable energy. Where impacts are localised and/or appropriate design mitigation has been applied, they will generally be considered to be acceptable;*
- iii. public access, including impact on long distance walking and cycling routes and scenic routes;*
- iv. impacts on aviation and defence interests including seismological recording;*
- v. impacts on telecommunications and broadcasting installations, particularly ensuring that transmission links are not compromised;*
- vi. impacts on road traffic and on adjacent trunk roads, including during construction;*
- vii. impacts on historic environment;*
- viii. effects on hydrology, the water environment and flood risk;*
- ix. biodiversity including impacts on birds;*
- x. impacts on trees, woods and forests;*
- xi. proposals for the decommissioning of developments, including ancillary infrastructure, and Site restoration;*

xii. the quality of Site restoration plans including the measures in place to safeguard or guarantee availability of finances to effectively implement those plans; and

xiii. cumulative impacts.

...

Grid capacity should not constrain renewable energy development. It is for developers to agree connections to the grid with the relevant network operator. In the case of proposals for grid infrastructure, consideration should be given to underground connections where possible.

f) Consents for development proposals may be time-limited. Areas identified for wind farms are, however, expected to be suitable for use in perpetuity”.

The objective of Policy 11 is obvious in that it is clearly advocating for significant expansion in renewable energy across Scotland, which the Proposed development would contribute to. Policy 11 provides a response to Policy 1 in that it offers renewable energy as a big part in the Scottish Government’s expected solution for tackling the Climate Emergency.

Also notable is that paragraph e) ii recognises that significant landscape and visual impacts are “to be expected” for some types of renewable energy development and that these will generally be considered as acceptable so long as “impacts are localised and/or design mitigation has been applied”.

9.2 Local Planning Policy

9.2.1 Adopted Local Development Plan (LDP)

The Site falls under the administrative jurisdiction of RC as the Local Planning Authority (LPA), therefore, the statutory Development Plan comprises of Second Renfrewshire Local Development Plan (RLDP). As RLDP was prepared and adopted in 2021 it refers to NPF3 and SPP. However, after the adoption of NPF4 in 2023, NPF4 is considered as the primary material consideration.

Therefore, the Local development planning documents pertinent to the Site are:

- Second Renfrewshire Local Development Plan (RLDP2); and
- LDP Supplementary Guidance (SG) - New Development Supplementary Guidance (2022)

9.2.2 Relevant Local Development Plan Policies

The Proposed Development is located within the Green Belt. The following RLDP2 policies are considered relevant to the proposals:

Policy I4: Renewable and Low Carbon Energy Developments

Development proposals which deliver increased energy efficiency and the recovery of energy that would otherwise be lost will be supported. Proposals should incorporate climate change mitigation and adaptation into the design of new development through the integration of renewable or low carbon energy technologies.

In relation to the scale of the contribution towards renewable energy generation targets and will be supported in principle where they are appropriate in terms of the location, siting and design having regard to any individual or cumulative significant effects on:

- Local environment, landscape character, built, natural or cultural heritage and water environment;
- Amenity of existing or allocated uses;



- Visual amenity, air quality, noise, glare and shadow flicker;
- Outdoor sport and recreation interest;
- Transport infrastructure, including road traffic and the safety of local and trunk roads and the railway network; and
- The safe and efficient use of the Glasgow Airport, flight activity, navigation, flight paths and Ministry of Defence surveillance system.

Policy P1: Renfrewshire’s Places

This policy states that’s, there will be a general presumption of favour of a continuance of the built form. All proposals should also not result in unacceptable impacts on the character of the area, environment or amenities of surrounding users.

Policy P5: Green/Blue Network

This policy states that, any new development proposals should contribute to and enhance the wider integrated green/blue network where there are opportunities.

Policy I3: Flooding and Drainage

The delivery of the Clyde and Loch Lomond Flood Risk Management Plan, the Scotland and Clyde Area River Basin Management Plans and the Metropolitan Glasgow Strategic Drainage Plan will be supported in order to reduce flooding, flood risk and improve the condition of water bodies within Renfrewshire.

Policy ENV 1: Green Belt

The green belt in Renfrewshire maintains the identity of settlements, protects and enhances the landscape setting of an area and protects and promotes access opportunities to open space across Renfrewshire in line with Clydeplan Policy 14 and the green belt objectives of Clydeplan.

Policy ENV 2: Natural Heritage

Development proposals will consider the potential impacts on natural heritage. Development proposals should protect and restore degraded habitats, enhance and promote access to Renfrewshire’s natural environment and minimise any adverse impacts on habitats, species, network connectivity or landscape character.

Policy ENV 3: Built and Cultural Heritage

Renfrewshire’s built and cultural heritage, which includes listed buildings, conservation areas, scheduled monuments, Sites of known archaeological interest, unscheduled archaeological Sites and the inventory of gardens and designed landscapes, will be safeguarded, conserved and enhanced.

Policy ENV 4: The Water Environment

This policy states that, there will be support for proposals which encourage protection of the existing water environment, improvements to the control and management of water and the enhancement of biodiversity, flora and fauna surrounding blue corridors.

Policy ENV 5: Air Quality

Development proposals individually or cumulatively should not have a significant adverse effect on air quality particularly within or adjacent to Renfrewshire’s Air Quality Management Areas as shown on the Proposals Maps.

Policy ENV 6: Natural Resources (Soils)



New development should avoid the unnecessary disturbance of areas of peatland or carbon-rich soils with a presumption against development which would involve significant draining or disturbance of peatland or carbon-rich soils. There will be support for peatland restoration, including rewetting where appropriate.

9.3 Emerging Local Development Plan

According to Renfrewshire Council's Development Plan Scheme (August 2022) the new the Local Development Plan 3 (LDP3) is estimated to be adopted in late 2026 or early 2027. A Draft for LDP3 is estimated to be prepared and published by the Council for consultation by the second quarter of 2025.

10 Planning Policy Assessment

10.1 Introduction

With the adoption of NPF4, this now takes precedence as the primary Policy document against which to assess the Proposed Development, followed by the LDP and other relevant material considerations.

This section addresses those planning matters raised by the Proposed Development against the planning Policy context outlined in Section 9 above. Compliance with NPF4 is considered first. Compliance with the RLDP policies is considered second, with a particular emphasis on Policy PV9 – Renewable and Low Carbon Energy Development as this is considered to be the most relevant RLDP Policy in the absence of any specific Policy which relates directly to electrical grid infrastructure.

10.2 Principle of the Proposed Development

10.2.1 Suitability of the Proposed Location

Details of the Site and its surroundings was provided in Section **Error! Reference source not found.** of this Statement and an overview of the Proposed Development was provided in Section **Error! Reference source not found.**; further detail is provided below with descriptions of various environmental considerations related to the Proposed Development. A review of the RLDP and resources made available by SEPA, NatureScot and Historic Environment Scotland ('HES') have been undertaken in order to inform the Section 36 Application. The Proposed Development is not within any of the following statutory designations: Special Areas of Conservation ('SAC'); SPAs; SSSIs; Ramsar Sites; GDL; or Conservation Areas. There are also no Listed Buildings or Scheduled Monuments within the Site boundary. The one known archaeological feature within the site (WW2 bunker) has been fenced off to protect it.

10.2.2 Contribution to Renewable Energy Targets

By improving the availability of renewable generation to the National Grid network, the Proposed Development will provide the grid network with increased flexibility and stability. This provides more opportunities for renewable energy generation developments to connect onto the National Grid and to provide stable availability of electricity transmission to the surrounding area. The Proposed Development is therefore in accordance with RLDP, specifically Policy I4 'Renewable and Low Carbon Energy Developments', which provides the criteria which renewable energy developments should adhere to.

The Proposed Development will contribute significantly to the renewable energy directive (2009/28/EC) as it will provide the grid network with stability throughout varying changes in electricity demand. This will enable the National Grid Network the flexibility with increasing sources of renewable energy being introduced to the grid in an effort to tackle climate change, as the growing demand for such services can be provided by the Proposed Development. As further demand for electricity transmission is growing, the Proposed Development provides further certainty and support to this increased renewable electricity generation.

The Proposed Development will act as a balancing service and will therefore contribute to the Scottish Government's NSS in NPF4; particularly in the planning and delivery of 'Sustainable Places': "*where we reduce emissions, restore and better connect biodiversity*". As previously mentioned, (section **Error! Reference source not found.**), of the 18 NADs in NPF4 (which are "*significant developments of national importance*"), the Proposed Development will constitute as NAD 3 - Strategic Renewable

Electricity Generation and Transmission Infrastructure. In the statement of need for NAD 3, it is emphasised how *“certain types of renewable electricity generation will also be required, which will include energy storage technology and capacity, to provide the vital services, including flexible response, that a zero-carbon network will require”*. The Proposed Development will therefore undoubtedly help towards achieving the Scottish Government’s NSS and related renewable energy targets.

Additionally, NPF4 Policy 11: Energy set out intentions to support low-carbon and net zero energy technologies throughout the transition to a net-zero Scotland by 2045, with its Policy Intent being to: *“Encourage, promote and facilitate all forms of renewable energy development”* including *“energy generation, storage, new and replacement transmission and distribution infrastructure and emerging low-carbon and zero emissions technologies including hydrogen and carbon capture utilisation and storage”* (emphasis added).

The Proposed Development is a facility designed to provide much needed flexibility and support to the grid during periods of high electricity demand and high generation from renewable sources. The Proposed Development provides National Grid with the flexibility to adjust to varying demands rapidly and is beneficial in ensuring that grid frequency is maintained.

Given the above context, it is considered that the Proposed Development is therefore of national strategic importance and should be afforded significant material weight. It is also supported by Scottish Government as it is an improved, more responsive mechanism to support the grid network and facilitate greater flexibility and stability within the national grid. As such, the Proposed Development will contribute to the low carbon energy effort by being able to provide a balance to renewable energy generation.

10.3 Compliance with National Planning Framework 4

As noted above, the Second Part of NPF4 uses three themes (sustainable, liveable, and productive places) to address national planning Policy. Under sustainable places, the third National Development identified is named *“Strategic Renewable Electricity Generation and Transmission Infrastructure”*.

The Proposed Development supports the substantial reinforcement of the electricity transmission grid as it provides infrastructure forming part of a BESS development will be able to store and transmit energy from renewable developments and therefore contributes to the development of sustainable places.

In terms of ‘sustainable places’ relevant NPF4 policies include the following:

- Policy 1: Tackling the Climate and Nature Crisis;
- Policy 3: Biodiversity;
- Policy 4: Natural Places;
- Policy 5: Soils;
- Policy 6: Forestry, Woodland, and Trees;
- Policy 7: Historic Assets and Places; and
- Policy 11: Energy.

The Proposed Development’s purpose is to provide storage, flexibility, and stabilisation services to the electricity grid, further enabling a decreased reliance on the use of fossil fuels to manage periods of peak energy demand within the grid. These services provide both direct and indirect effects to help

tackle the climate change and nature crises, ensuring the Proposed Development maintains compliance with this Policy 1 contained within NPF4.

10.3.1 Ecology and Biodiversity

A Preliminary Ecological Appraisal (PEA) for the Site was produced by Tetra Tech in June 2024. The PEA concluded that the Proposed Development would have a negligible impact on the identified statutory designated Sites, subject to appropriate mitigation measures being implemented.

This PEA discovered potential protected and notable species, including nesting birds, red squirrels, hedgehog, and brown hare. It is recommended that a walkover by an ecological clerk of works (ECoW) to identify any features suitable for use by reptiles is undertaken at the start of works. However, the PEA concluded that no further assessments would be required for other ecological receptors (including designated Sites, habitats, badger, otters, water voles, bats, birds, GCN and common amphibians, reptiles, invertebrates, and invasive species) and that no adverse impacts were predicted.

The PEA recommends that best practice working methods should be followed to prevent any potential harm or disturbance to any protected species or other animal that may use the Site.

Furthermore, while no adverse impacts on ecology were predicted, the Applicant has sought to maximise the ecological and biodiversity value of the Site through the design of the Proposed Development. As part of the landscaping mitigation proposals produced for the Site, opportunities were explored, and measures were included along the Site boundaries which offer habitat enhancements for local wildlife.

Following the outcomes of the PEA, further reporting was produced by Tetra Tech in the form of a Breeding Bird Report, BEMP, LEMP and Lighting Plan Review to ensure best practice measures and guidance would be implemented within the design, construction and operation of the Proposed development. The BEMP and LEMP ensured appropriate habitat retention, replacement and mitigation would be embedded into the Proposed Development's design from an early stage, which would have far reaching benefits to the biodiversity of the Site and the surrounding environment. The Lighting Technical Note summarises the appraisal of the external lighting design aimed at limiting the risk of adverse impacts to ecological receptors within and surrounding the Site. The design measures recommended as part of these reports and subsequently included within the Proposed Development's design, should provide considerable weight to the assessment of the Proposed Development against those relevant local and national planning policy for the biodiversity protection and enhancement. It should also be noted that proposed landscape planting within the scheme's design will provide much greater benefits to biodiversity enhancement when compared with the consented scheme as part of Appeal decision ref. PPA-350-2047. Therefore, the Proposed Development is considered to be compliant with NPF4 Policy 3, 4 and 11 with regards to impacts on ecology and biodiversity.

10.3.2 Landscaping and Visual Amenity

A Landscape and Visual Appraisal (LVA) was undertaken by TGP as part of this Section 36 application. The LVA concluded that the Proposed Development's landscape effects would be localised and concentrated within the Rugged Upland Farmland Landscape Character Type (LCT), which is already influenced by electricity infrastructure. Appeal decision ref: PPA-350-2047 established that the principle of the development, in terms of landscape and visual impact, is acceptable in this location. Furthermore, the scale and massing of development now proposed at the Neilston GGP is overall smaller, as the 6 m high energy management buildings previously approved under appeal decision ref: PPA-350-2047 are now not being constructed. Notwithstanding that there will be visual impacts from



the Proposed Development, it will result in a landscape and visual betterment to what was previously consented at appeal.

Case in point, a photomontages comparison at Viewpoint 4 (i.e. taken from approx. 1km south-west of the site and along Gleniffer Road) between the consented appeal scheme vs the this s.36 scheme are shown below. It is clear from this viewpoint in particular, the s.36 scheme is noticeably less dense as well as from an overall scale and massing perspective.



Appeal Scheme (Consented) – Year 15



S.36 Scheme – Year 15

Compared to the consented scheme, the new layout would not increase the impact on this LCT. There would be no additional indirect effects on Gleniffer Braes Country Park or on the Renfrewshire Green Belt. Visual effects on views from Core Path GB/24 and the B775 would be limited and screened by vegetation or infrastructure. These effects are anticipated to be reduced to upon completion and after 15 years of operation, following the implementation of the proposed planting belt along the Site boundaries.

The Proposed Development is, therefore, considered to be compliant with NPF4 Policy 11 with regards to impacts on landscape and visual amenity.

10.3.3 Cultural Heritage and Archaeology

The Proposed Development would not affect any nearby located heritage assets, and no buried archaeological remains are expected within the Site boundary. However, if any such remains are discovered, they will be removed during construction. A World War 2 bunker is located within the development area, which survives in relatively good condition and is unchanged since it was recorded by Historic Environment Scotland (HES) in 2017. This has been the subject of a detailed survey previously, therefore a stand-off distance of 4 m is incorporated in the Proposed Development layout to ensure no adverse impacts on this bunker.

No archaeology or cultural heritage assessment has been prepared in support of this application. This is due to the fact that a Written Scheme of Investigation (WSI) was previously submitted to discharge condition 2 of Decision Notice 21/0034/PP and this takes account of the one known heritage asset (World War Two bunker) that is present within the Site.

A walkover survey of the site was undertaken in December 2022, as informed by the previously prepared WSI. The results of this walkover found that aside from the identified bunker, little archaeological potential was otherwise noted. Regarding the previously consented underground cable to the north east, this area has all been disturbed previously by the construction of the substation that previously stood here. Accordingly, it was considered reasonable to assume this area has negligible archaeological potential.

The Applicant is happy to accept an appropriately worded planning condition requiring consideration of any on Site archaeology potential prior to construction start. For these reasons, it is considered that the Proposed Development is compliant with Policy 7 of NPF4.

10.3.4 Environmental Impacts

Policy 11 provides support for all forms of renewable energy, including for battery storage, and stated that such projects need to demonstrate that project design and mitigation has addressed environmental impacts. Environmental impacts of relevance to the Proposed Development are:

- Impacts on communities and individual dwellings, including, residential amenity, visual impact, noise;
- Impacts on road traffic and on adjacent trunk roads, including during construction;
- Impacts on historic environment;
- Impacts on landscape;
- Effects on hydrology, the water environment and flood risk;
- Biodiversity including impacts on birds;
- Impacts on trees, woods, and forests; and
- Impacts on soils and Prime Agricultural Land

The various technical assessments prepared in support of the Proposed Development demonstrate that there would be no adverse environmental impacts from the Proposed Development on the environmental assets listed above. The Proposed Development is therefore considered to be in compliance with the relevant sustainable places policies of NPF4, in particular Policy 11. Great weight should be afforded to the Proposed Development's compliance with NPF4 given it is the key Policy document against which new development proposals are to be assessed.

10.4 Compliance with the Local Development Plan

The Proposed Development has been assessed against the following RLDP policies throughout this Application:

- Policy I4 Renewable and Low Carbon Energy Developments;
- Policy P1 Renfrewshire's Places
- Policy P5 Green/Blue Network;
- Policy I3 Flooding and Drainage;
- Policy ENV 1 Green Belt;
- Policy ENV 2 Natural Heritage;
- Policy ENV 3 Built and Cultural Heritage;
- Policy ENV4 The Water Environment;
- Policy ENV 5 Air Quality; and
- Policy ENV 6 Natural Resources (Soils).

The Proposed Development is considered to be compliant with the RLDP. Technical assessments prepared in support of the Proposed Development and the recommended mitigation measures proposed within these have been adopted through the design process of the Proposed Development. Further assessment against relevant RLDP policies is set out in the paragraphs below.

10.4.1 Renewable Energy and Sustainable Development

As detailed within Section 5 of the report, the Proposed Development provides a variety of grid stabilisation and flexibility services that ensures the considerable contributions to the promotion of the Scottish Governments targets in relation to Climate Change and Green House Gass emissions. By improving the availability of renewable generation to the National Grid network, the Proposed Development will provide the grid network with increased flexibility and stability. This provides more opportunities for renewable energy generation developments to connect onto the National Grid and to provide stable availability of electricity transmission to all within the surrounding area. The Proposed Development is therefore in accordance with RLDP Policy I4: Renewable and Low Carbon Energy Developments.

10.4.2 Ecology

A Preliminary Ecological Appraisal (PEA) supported by a breeding bird survey, a lighting plan review, a BEMP and a LEMP are accompanying this application to assess any ecological impacts that may arise from the Proposed Development and to ensure that the design submitted aligns with best practice measures. These documents have been prepared by Tetra tech. The PEA concludes that the Proposed Development is unlikely to cause adverse effects on the surrounding environment. Tetra tech performed phase 1 habitat surveys and reports on the protected and notable species in the area to determine the level of conservation importance and any mitigation necessary to protect the ecological features of the area. Notably, the PEA reports the evaluation of importance of each habitat and species identified. The Site includes areas of woodland, grassland, bog and running water as well as areas of hardstanding and buildings, however all these habitats evaluated, are considered to be of either local or negligible importance. Most species assessed as part of this PEA were not detected within 2 km of the Site but due to the habitats present there is a possibility that these could be used by different species. Given the location of the Proposed Development and the location of habitats and species in the area, the PEA suggests potential mitigation strategies and enhancement opportunities that could

be utilised and should be considered. The landscaping enhancements proposed will increase the ecological value of the site meaning that the Site would be compliant with current local and national biodiversity planning policy and legislation.

As well as the PEA, Tetra tech prepared a breeding bird survey of the Site to determine locally designated sites of relevance to birds and identify ways in which the Proposed Development can mitigate impacts on the breeding bird population. Similarly, the breeding bird survey notes that enhancements for biodiversity and breeding birds are important to allow the Proposed Development to align with national biodiversity policy and legislation.

The Renfrewshire local development plan will support developments which protect and enhance biodiversity and nature, in line with the NPF4. It places importance on safeguarding and enhancing the wider environment by delivering net biodiversity gains and ensuring the avoidance of adverse impacts. The Proposed Development has been designed to be low lying and to limit impacts to biodiversity by conserving as much of the habitats present as possible. All biodiversity enhancements proposed will benefit the species in the area and the local landscape. The Biodiversity Enhancement and Management Plan (BEMP) has been issued with reference to the previous surveys undertaken to summarise important ecological mitigation and enhancement measures for the Proposed Development. The BEMP details these measures in the construction, and post-construction phases of the Proposed Development. This report along with the aforementioned assessments undertaken at the Site conclude that the Proposed Development is compliant with local and national biodiversity planning policy and legislation.

10.4.3 Landscape and Visual Impacts

A Landscape and Visual Appraisal (LVA) is accompanying this application, which was undertaken by TGP as part of this Application. The LVA concludes that the landscape effects of the Proposed Development would be localised and concentrated within parts of the Rugged Upland Farmland Landscape Character Type (LCT). The Rugged Upland Farmland LCT is already heavily influenced by electricity infrastructure. When compared to the consented scheme, the Proposed Development Layout would not increase the level of effect on the Rugged Upland Farmland LCT.

Similarly, there would be no additional indirect effects on Gleniffer Braes Country Park, and no significant effects on the Renfrewshire Green Belt. The visual effects of the Proposed Development on views from Core Path GB/24 and the B775 would be limited to localised sections and would be screened by intervening vegetation and/or infrastructure. Over time, planting along the Site boundaries would gradually soften views of the Proposed Development. The Proposed Development would however result in a permanent loss of a small portion of pastoral farmland on which the Site is located. The current land pastoral land use and minimal loss of trees or hedges would limit effects on the landscape fabric giving rise to a Moderate/Minor effect.

As stated in Renfrewshire Landscape Assessment (2019) the Site is located within the Green Belt designation. Policy ENV 1 of the RLDP2 states that development within the Green Belt will be considered appropriate in principle where it is for essential infrastructure such as renewable energy developments. The Proposal Development is of a Battery Energy Storage Solution which provides a means of allowing electricity from the grid to be imported and stored at times of low demand, which can then be exported back into the grid at times of higher demand. The Proposed Development is not only essential infrastructure as it can control supply or electricity as per the need, but it could also help store electricity from renewable sources to compensate for adverse weather conditions which affect energy production for example rainy weather or cloudy days or less windy days.

The Proposed Development has been designed so it is of modest scale and also incorporates landscaping measures comprising native planting to minimise its visibility within the landscape. The Proposed Development location although within Green Belt, is essential due to the presence of a grid connection point at Neilston substation located immediately to the north of the Site beyond the B775.

The Site's immediate landscape comprises of electrical infrastructure, plans include new tree and hedgerow planting which would strengthen and enhance the pattern and quality of the landscape. The Proposed Development aims to conserve the biodiversity value of land by retaining trees and hedgerows where possible, to minimise the fragmentation of habitats. Biodiversity and landscape enhancements proposed will help to enhance the local landscape.

The Proposed Development would typically be experienced as a smaller-scale, lower lying addition to the landscape, which is influenced by the network of existing OHLs. The existing large-scale pylons would continue to represent the prominent features within the landscape based on their larger height and wider spread across the landscape.

The LVIA report finally concludes that the Proposed Development could be accommodated at the Site with limited and relatively localised effects on the local landscape character and visual amenity. It is concluded that the Proposed Development aims to conserve the biodiversity value of land by retaining trees and hedgerows where possible, to minimise the fragmentation of habitats. Enhancement measures have been proposed to improve the overall biodiversity of the Site and is therefore in compliance with Renfrewshire Local Plan Development Plan Policies 14 (Renewable and Low Carbon Energy Developments), ENV1 (Green Belt), and EN2 (Natural Heritage).

10.4.4 Cultural Heritage and Archaeology

As outlined in section 10.3.3, the Proposed Development is considered to be compliant with applicable NPF4 policies in respect of cultural heritage and archaeology and is therefore also considered to be compliant with RLDP Policy PV8 with regards to any impacts on cultural heritage and archaeology.

10.4.5 Traffic and Transport

A combined Transport Statement and CTMP (TS & CTMP) has been prepared in support of the Proposed Development. This TS & CTMP concludes that the proposed construction route which includes existing access track, is suitable, safe, and appropriate for the accommodation of HGVs during the construction phase, as well as appropriate for the minimal traffic to Site during the operational phase.

During the construction phase the Site would generate approximately 142 movements vehicle movements per day at the peak. Additionally, as the Proposed Development will not be manned, operational traffic is expected to be minimal and would be conducted by smaller vehicles. The impact of this on the wider road network will be negligible.

It is also noted that the well-established access route to the Site has also been utilised for the construction of the Proposed Development. It therefore concludes that the Proposed Development is in compliance with Policy 14 – Renewable and Low Carbon Energy Developments to avoid significant effects on transport infrastructure.

10.4.6 Flood Risk and Drainage

According to Scottish Environment Protection Agency (SEPA), the Site's northern and western boundary has medium to high risk of surface water flooding risk (as shown in the image below). The



nearest river water flooding risk area is approximately 970m to the southeast of the Site associated with a junction of drainage ditches.

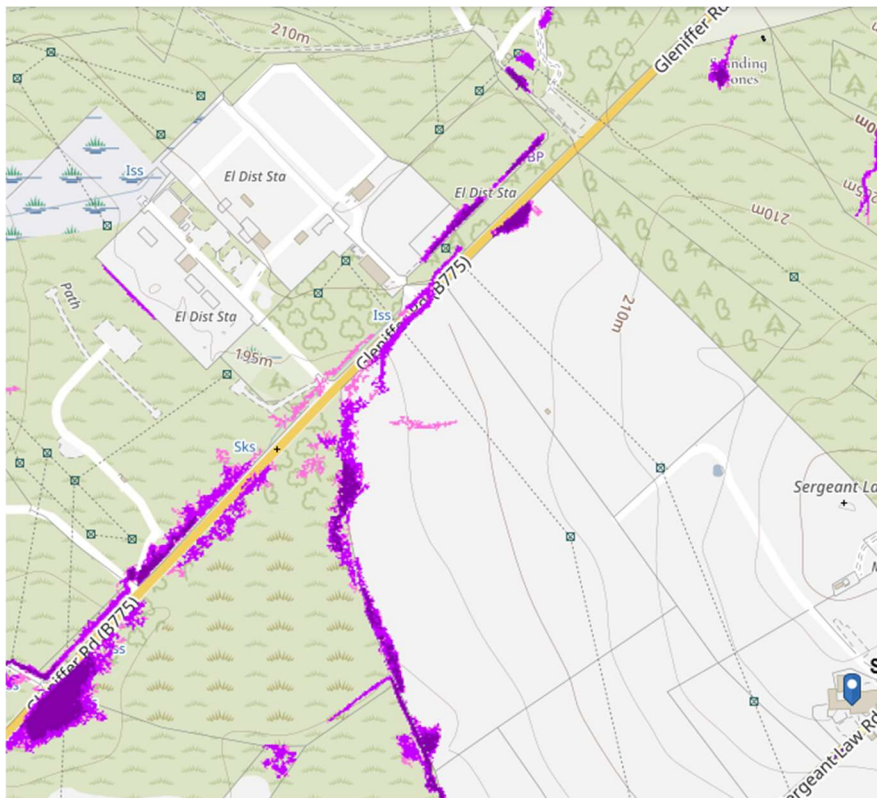


Figure 10.1: Surface Water Flooding Risk Map (SEPA)

A detailed Drainage Strategy report has been prepared by Vazquez Besada Consulting which provides information on drainage constraints at the Site and follows Government guidance with regards to development and surface water management. This strategy demonstrates that the proposed surface water drainage strategy will provide a sustainable surface water management scheme and ensure no increase in downstream flood risk by managing discharges from the Site to the local water environment in a controlled manner.

The Renfrewshire Local Development Plan Policy 13 refers to new developments demonstrating sustainable flood risk management measures by implementing sustainable drainage infrastructure. Additionally, developments must not have an adverse impact on existing drainage infrastructure and all developments proposals shall demonstrate the sustainable management of water providing suitable drainage. The Neilston Proposed Development incorporates a sustainable drainage system that has the capacity to ensure no flooding will occur at the Site that would adversely impacting existing infrastructure. It is therefore concluded that the Proposed Development is in compliance with RLDP2 Policy P1(Renfrewshire’s Places) and ENV 4 (the Water Environment).

10.4.7 Noise

A Noise Impact Assessment (NIA) has been undertaken by TNEI to support this application. In order to predict the noise emission levels of the Proposed Development, a noise propagation model has been prepared in accordance with ISO 9613 based on candidate plant typical for this type of development and on the assumption that noise control measures will be incorporated into the design, including acoustic enclosures fitted to the inverter/transformer units and the installation of a series of barriers.

There is only one receptor located close to the Proposed Development and the predicted noise levels at the receptor are 2 DB below the daytime background sound levels and 3 DB above the nighttime background sound levels.

The BS 4142 assessment has considered the difference between the Rating Level and the background sound level, as well as the context of the development, and concluded that the Proposed Development is not expected to have a diverse impact in terms of noise. The Proposed Development is therefore considered to be compliant with RLDP2 Policies P1 (Renfrewshire's Places), and ENV6 (Natural Resources).

10.5 Conclusions on Compliance with Planning Policy

Consideration of all environmental impacts from the Proposed Development through the technical assessments have demonstrated that there would be no unacceptable adverse environmental effects from the Proposed Development and therefore that the Proposed Development is considered to be in compliance with the relevant planning policies and guidance. The principle of the Proposed Development as a form of infrastructure to reinforce stability and flexibility within the national grid further provides justification of the Proposed Development as sustainable development as it will help to ensure the continuing utilisation of renewable forms of energy generation in both a local and national context.

11 Conclusions

It is evident from reviewing current national renewable energy Policy that the Scottish Government is committed to tackling climate change, moving towards a zero-waste Scotland, and increasing the use of renewable energy. Furthermore, the Scottish Government has declared a Climate Emergency in response to clear and irrefutable evidence that the world must act now to limit global warming to 1.5°C. Scotland must transition from a reliance on fossil fuels to utilising renewable energy sources in order to act on climate change. As such, there is an increasing pressure upon communities to shift to sustainable, low-carbon sources of energy.

The Proposed Development assists the UK to meet national and international targets for the reduction of emissions including GHGs. The Proposed Development will also contribute to the provision of long-term sustainable and competitive energy supplies, assisting the UK renewables industry to become competitive in home and export markets and, in doing so, provide employment opportunities.

The key features in support of the Proposed Development are summarised below:

- It complies with NPF4 and the RLDP and can draw support from a number of material considerations;
- It is designed to support the flexible operation of the grid network and will provide a significant contribution to a variety of important services to National Grid;
- It enables the decarbonisation of electricity supply in support of EU targets and National Planning Policy;
- The Site is not sensitive in regard to environmental considerations such as; landscape, cultural heritage, air quality, hydrology, flood risk and ecology and biodiversity;
- In particular, there is a clear landscape and visual betterment when compared to the consented appeal scheme;
- It is located in a rural location, away from any sensitive receptors; and
- Construction, operation/maintenance of the Proposed Development would create employment opportunities for the locals and also potentially support small local businesses.

This Planning, Design and Access Statement sets out an appraisal of material planning considerations, which includes the policies contained within NPF4 and the RLDP along with a range of other documents which are considered material to the determination of the Proposed Development. It is considered that the Proposed Development complies with all the relevant policies of the statutory Development Plan and offers significant benefits which have been listed throughout this Statement. On this basis the Proposed Development is commended to the ECU for consent.

Appendix A – Appeal Decision Ref. PPA-350-2047 and Approved Plans

Appendix B – 3D Visuals of Proposed Development