NEILSTON GREENER GRID PARK

LAND OFF GLENIFFER ROAD, PAISLEY

PLANNING STATEMENT

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EXECUTIVE SUMMARY

This Planning Statement is produced in support of an application requesting planning permission for a Greener Grid Park at land off Gleniffer Road, Paisley. The Application is made by Statkraft UK LTD to Renfrewshire Council, with this Planning Statement being produced on behalf of the Statkraft UK LTD by Arcus Consultancy Services Ltd.

This Statement and the accompanying appendices are considered to provide all the relevant information required for the Council to make a positive determination of the Application. This Statement sets out the requirement for the Development and the benefit of energy storage for the purpose of balancing the supply and demand of energy and contributing to the efficient operating of a renewable energy-based system.

As per the Town and Country Planning (Scotland) Act 1997 (as amended), the determination of a planning application should be based on its accordance with the local development plan, unless material considerations indicate otherwise. This Statement addresses, in detail, all relevant policies from the Renfrewshire Local Development Plan and determines that the proposed Development fully accords with all policies contained therein.

Beyond compliance with the Renfrewshire Local Development Plan, consideration must be given to the role that energy management and storage can provide in the renewable energy industry. Renewable energy is dependent upon weather conditions and the ability to manage supply and demand of energy in the instances when conditions impact supply is integral to the efficiency of the industry, and the ability to achieve national and European goals of decarbonisation and climate change action.

Taking into account all policies relevant to the proposed Development and material considerations, the Development is considered to comply with policy and legislative aims at local, national and European levels. It is therefore requested that planning permission for the Development is granted.

1 INTRODUCTION

1.1 Background

This Supporting Statement ('the Statement') has been prepared to accompany a planning application ('the Application'), submitted to Renfrewshire Council ('the Council') by Arcus Consultancy Services Ltd ('Arcus'), on behalf of Statkraft UK Ltd ('the Applicant') for the development of a greener grid park ('the Development'), to support the flexible operation of National Grid and decarbonisation of electricity supply by balancing electricity supply and demand.

The Development is located approximately 400m northwest of Sergeantlaw, off Gleniffer Road, Paisley; and opposite of the existing Neilston substation ('the Site'). The location of the Site and layout of the Development are shown on Planning Drawings 1 and 2, respectively.

The Application for the Development is made under the Town and Country Planning (Scotland) Act 1997[1], as amended by the Planning etc. (Scotland) Act 2006[2] ('the Planning Act'). As defined by the Town and Country Planning (Hierarchy of Developments) (Scotland) Regulations 2009[3], the Development exceeds the 2 hectares (ha) threshold for a 'major' planning application as set out in the Regulations. As such, the Development is subject to the consultation and determination requirements for 'major' developments. Further details on the planning history can be found in Section 2, whilst the statutory framework for the determination of the Application is found in Section 3.

The purpose of this Statement is to outline the Development, the framework for determination, and to provide an assessment of the Development against the context of planning policy and energy targets.

1.2 The Applicant

The Applicant is Statkraft UK LTD. Statkraft is Europe's largest generator of renewable energy; producing hydropower, wind power, solar power, battery storage, gas-fired power, and supplying district heating. Statkraft owns and operates 11 wind farms in the British Isles and the Nordics, with a combined installed capacity of almost 1,000 MW (1GW).

1.3 Need for the Development

Renewable technologies are intermittent as the amount of energy generated is dependent on weather conditions. It is therefore necessary to balance demand and supply in order to prevent shortages and blackouts, such as those experienced in the South East of England in August 2019.

As such, there is a growing demand by network operators for a broad range of services such as storage and management. The Development is designed to support the flexible operation of the National Grid and the decarbonisation of the electricity supply. The proposed Greener Grid Park would provide rapid-response electrical back-up to the National Grid and would represent an early deployment within the UK of a high-tech grid balancing facility. This is required for a number of reasons:

- Electricity Market Reform;
- The Capacity Market; and

[1] Scottish Government (1997) Town and Country Planning (Scotland) Act 1997 [Online] Available at: https://www.legislation.gov.uk/ukpga/1997/8/contents (Accessed 23/11/2020)

[2] Scottish Government (2006) The Planning etc. (Scotland) Act 2006 [Online] Available at: https://www.legislation.gov.uk/asp/2006/17/contents (Accessed 23/11/2020)

[3] Scottish Government (2009) Town and Country Planning (Hierarchy of Developments) (Scotland) Regulations 2009 [Online] Available at: https://www.legislation.gov.uk/sdsi/2009/9780111001714/contents (Accessed 23/11/2020)

- Balancing the Network.

1.3.1 *Electricity Market Reform*

Given the reduction in centralised coal-fired power, increasingly cheap but intermittent renewable energy supply and the transition to electric vehicles, it is increasingly likely there will be peaks and troughs in the UK energy supply and demand.

It is estimated that over the next decade, the UK will require approximately £100 billion investment in electricity infrastructure to accommodate projected future increases in electricity demand, replace ageing power stations and prevent electricity blackouts. The Development is proposed in response to the requirement for continuity of supply and storage of electricity, particularly during periods of peak demand and over-supply.

Electricity Market Reform ('EMR')[4] is a UK government policy designed to:

- Incentivise investment in secure, low-carbon electricity;
- Improve the security of the UK's electricity supply; and
- Improve affordability for consumers.

The UK's electricity grid has historically relied on large centralised power plants. However, old coal power plants are in the process of reducing capacity and closing as they no longer meet the required environmental and performance standards and existing nuclear power plants are reaching the end of their design lives, while the delivery of new nuclear plants has been beset by delays. In parallel, there is the requirement to deliver a greater amount of renewable energy but these technologies (e.g. wind and solar generation) are intermittent, only generating when the wind blows or sun shines. These different factors mean that demand and supply are more challenging to match.

1.3.2 *The Capacity Market*

Through the Energy Act 2013[5], the Capacity Market mechanism was introduced to ensure security of electricity supply at the least cost to the consumer.

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 with 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. The Development is anticipated to participate in the Capacity Market in addition to providing other balancing services to the National Grid.

1.3.3 *Balancing the Network*

Balancing the system to ensure demand is met by supply is a key requirement of the National Grid, and it is becoming more challenging as intermittent generation – such as wind and solar power – becomes a bigger proportion of the overall energy mix.

The National Grid 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

[4] UK Government (2012) Electricity Market Reform: Policy Overview [Online] Available at: https://www.gov.uk/government/publications/electricity-market-reform-policy-overview--2 (Accessed 23/11/2020)
[5] UK Government (2013) Energy Act 2013 [Online] Available at: http://www.legislation.gov.uk/ukpga/2013/32/contents/enacted (Accessed 23/11/2020)

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 comes offline, then the National Grid control room need an alternative source of power. This is achieved with rapid responding facilities such as the proposed Development which can absorb energy from the grid as instructed.

As an innovative 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 absorb electricity quickly which will allow for the oversupply of the grid to be managed.

1.4 Site Selection Criteria

The 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, minimising disturbance and costs. The substation is capable of accommodating the transfer of electricity to and from the Development at an acceptable cost which will provide valuable support to grid protecting local customers at times when high demand places stress on the local and wider electricity network. As a result of the close proximity to the substation, underground cables will avoid any major infrastructure, minimising connection and transmission costs. The small scale of the underground grid connection required will also significantly minimise construction-related disruption.

The other key criteria which have led to the Site being selected for energy management development include:

- Character of Site and surrounding area
- Separation from residential properties;
- Topography;
- Ease of access to the site for construction;
- Lack of environmental constraints (e.g. ecological/landscape designations, flood risk, etc.)

Following consideration of the above factors and the existing infrastructure within the wider area, the selected site was identified as having excellent potential for development with minimal environmental impacts.

1.5 The Planning Application Submission

After pre-application consultation with the Council, the following agreed upon environmental and technical reports are appended to this Planning Statement:

- Appendix 1 – Landscape and Visual Appraisal;
- Appendix 2 – Outline Sustainable Drainage Strategy;
- Appendix 3 – Preliminary Ecological Appraisal;
- Appendix 4 – Landscape Planting Plan;
- Appendix 5 – Design and Access Statement
- Appendix 6 – PAC Report; and
- Appendix 7 – Screening Response.

The following plans and drawings are submitted alongside the planning application:

- Planning Drawing 1 – Location Plan;
- Planning Drawing 2 – Proposed Site Layout Plan;
- Planning Drawing 3 – Indicative Palisade Fence Detail;
- Planning Drawing 4 – Indicative Palisade Gate Detail;
- Planning Drawing 5 – Indicative Battery Container;

- Planning Drawing 6 – Indicative Transformer & HV Compound;
- Planning Drawing 7 – Indicative Inverter Cabinets;
- Planning Drawing 8 – Indicative RS Building;
- Planning Drawing 9 – Indicative Communications Room;
- Planning Drawing 10 – Indicative Cooler;
- Planning Drawing 11 – Indicative Security Column
- Planning Drawing 12 – Diesel Generator; and
- Planning Drawing 13 – LV Switch House.

2 THE DEVELOPMENT

2.1 Overview

The Applicant is seeking planning permission for the construction and operation of a Greener Grid Park.

The Development is designed to support the flexible operation of the National Grid and decarbonisation of electricity supply. The Development will store, import and export electricity but will not generate any additional electricity nor have any direct on-site emissions of CO_2.

2.2 Development Infrastructure

The Development will consist of the following components, as shown on the Site Layout Plan (Planning Drawing 2):

- 364 no. battery units (each 12.9 m x 2.44 m x 2.59 m) (Planning Drawing 5);
- 46 no. inverter units (each 6.1 m x 2.44 m x 2.59 m) (Planning Drawing 7);
- 14 no. transformers with 7.0 m high connecting bus bars (Planning Drawing 6);
- 7 no. LV switch houses (each 7.5 m x 9.1 m) (Planning Drawing 13);
- 7 no. fire wall (each 46.7 m x 0.5 m x 14 m);
- 28 no. E-House (each 20.7 m x 38.6 m x 10.0 m);
- 14 no. energy management system (each 20.7 m x 36.7 m x 10.0 m);
- 28 no. coolers (each 11.3 m x 2.4 m x 2.5 m) (Planning Drawing 10);
- 46 no. switchgears (each 12.2 m x 2.44 m x 3.0 m);
- 7 no. diesel generators (each 6.1 m x 3.6 m) (Planning Drawing 12);
- 7 no. comms house (each 12.19 m x 2.44 m x 2.59 m) (Planning Drawing 9);
- 14 no. disconnectors (each 2.2 m x 4.5 m);
- 6 no. security columns of 6 m in height with CCTV cameras (Planning Drawing 11) located at various points around the site boundary;
- Internal roads; and
- A 2.4 m palisade fence around the perimeter of the Site (Planning Drawings 3 and 4) and 3.4m high electric security fencing.

Most components of the development will be housed in steel container-style units, while the palisade fencing and electric fence not only provide security but will adhere to the aesthetic of industrial developments and matches the National Grid substation opposite the site. The appearance of the Development will be unobtrusive and in keeping with the existing industrial character of the area.

2.3 Access

The Development will be accessed via Gleniffer Road. The location of the access point has been discussed without the Council throughout the pre-application process. During the operational phase of the development, it is anticipated that approximately 1 vehicle per week will visit the site, resulting in approximately 2 two-way vehicle movements per week.

2.4 Construction

The construction and installation of the Development will take approximately 24 months and be conducted in stages. During the construction period, it is anticipated that approximately 40 vehicles per day will visit the site, resulting in 80 two-way movements per day.

3 PLANNING HISTORY

3.1 Pre-Application Advice

On 8th October 2019, Arcus submitted a Pre-Application Advice request to the Council for preliminary advice on the Development. Subsequently, a site visit was arranged between the Council and Arcus on 4th November 2019, and a meeting between the Council, the Applicant and Arcus was held on 18th November 2019, at the Council offices.

The Council provided detailed pre-application advice, via email, on 17th January 2020. The key points raised in the response are summarised below:

- The principle of the Development would be acceptable with respect to the relevant green belt policies that cover the site. Electricity equipment is considered essential infrastructure and is an acceptable form of development within the Green Belt;
- Regarding site access, the advised approach is to distinguish between construction and operational access;
- The Applicant should include suitable screen planting and boundary treatment, as well as considering the colour of on-site infrastructure in order to reduce visual impact;
- No issues foreseen with regards to noise;
- No issues foreseen with regards to air quality;
- An ecological survey would be beneficial, although it is not anticipated that the site will be of high ecological value;
- A drainage statement will also likely be required given the land coverage associated with buildings, hard standing etc.;
- Confirmation of flood lighting would also be sought; and
- It is noted that by exceeding the 2 hectare threshold, the Development is classed as a 'major development'.

The pre-application response was used to inform the site design and the supporting documents submitted with the Application.

3.2 EIA Criteria and Screening

Regulation 2 (1) of the Town and Country Planning (Environmental Impact Assessment) (Scotland) Regulations (2017)[6] ('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.

Energy management developments are not listed within Schedule 1 of the EIA Regulations. Within Schedule 2, a development area threshold in excess of 0.5 hectares is applied to Category 10 (a): Industrial estate development projects. Given that the Site area exceeds this threshold, the requirement for an EIA is determined by considering the selection criteria detailed within Schedule 3 of the EIA regulations. The Selection Criteria in Schedule 3 includes an assessment of the following:

- Characteristics of the Development;
- Location of the Development; and
- Characteristics of the Potential Impact.

On 28th October 2019, a request for an EIA Screening Opinion was submitted to the Council (Reference: 19/0735/EO). A Screening Response was received on 8th December 2019,

[6] Scottish Government (2017) the Town and Country Planning (EIA) (Scotland) Regulations 2017 [Online] Available at: http://www.legislation.gov.uk/ssi/2017/102/contents/made (Accessed 23/11/20)

confirming that following an assessment, the proposal is considered unlikely to result in significant (and complex) environmental effects and therefore an EIA is not required for the development.

Following a revision to the site boundary, a request for a new EIA Screening Opinion was submitted to the Council on 10th August 2020. A Screening Response (Appendix 7) was issued on 1st October 2020, confirming again that the Development was not considered EIA an Environmental Statement would not be required.

3.3 Proposal of Application Notice

As acknowledged in Section 1.1 of this Statement, the Development is classed as 'major'. As such, there is a statutory requirement for the Applicant to submit a Proposal of Application Notice ("PAN") to the Council, at least 12 weeks prior to the submission of the Application. The purpose of the PAN is to inform members of the public about the consultation and allow for input prior to the submission of the full planning application.

The PAN (Reference: 20/0353/NO) was submitted to the Council on 26th June 2020. As such, no application could be submitted to the Council until the 12 week period expired on 18th September 2020.

3.4 Pre-Application Public Consultation

In accordance with the *Town and Country Planning (Development Management Procedure) (Scotland) Regulations 2008*, a pre-application consultation must be carried out in support of any planning application what is classed as a 'major development' under the *Town and Country Planning (Hierarchy of Development) (Scotland) Regulations 2009*.

On 24th April 2020, the Scottish Government published guidance on Pre-application consultation requirement during the Covid 19 emergency[7]. The intention of this guidance is to provide a framework for both Councils and Applicants to ensure that sufficient and suitable alterative measures to a face to face public event can be provided to give opportunity to members of the public to engage with the proposals.

Following publication of this guidance, discussions were held between Arcus and the Council to agree upon the particular form that alternative consultation measures would take. The measures proposed by the Applicant (via Arcus) and agreed upon by the Council were as follows:

- A dedicated project website, to be live and available to the public for a minimum of 4 weeks prior to the application, containing the following agreed upon features:
    - Video content regarding the applicant and the project;
    - A library of documents including technical drawings;
    - A FAQ section with surveys/polls and a question/comment feature;
    - Subscription function for updates; and
    - Function to request a call back.
- An advert published in a locally circulated newspaper. The advert was published in the 12th August 2020 edition of the Renfrewshire Gazette.
- A leaflet distribution to local properties, informing them of the PAN. The catchment area for the distribution of the leaflet was agreed upon.

[7] Scottish Government (2020) *Scottish Government Guidance: Covid 19 Emergency and Pre-Application Consultation and Requirements for a Public Event* [online] Available at: https://www.gov.scot/binaries/content/documents/govscot/publications/advice-and-guidance/2020/04/coronavirus-covid-19-planning-guidance-on-pre-application-consultations-for-public-events/documents/covid-19-emergency-and-pre-application-consultation-and-requirements-for-a-public-event/covid-19-emergency-and-pre-application-consultation-and-requirements-for-a-public-event/govscot%3Adocument/Planning%2BCOVID%2B19%2Bemergency%2Bmeasures%2BPre-application%2Bconsultation%2Bguidance%2B%2B-%2Bfinal%2Bversion%2Bfor%2Bpublication.pdf (Accessed 23/11/2020)

It is noted that all distributed materials, including the advertisement and the leaflet, contained the web address for the dedicated consultation website and the direct telephone number for enquiries about the project.

The consultation website was launched on 14th August 2020 and was open for public engagement until the 11th September. The summary of the consultation is found in the accompanying PAC Report.

4 THE STATUTORY FRAMEWORK

4.1 Pre-Application Process

Regulation 2(1) of the Town and County Planning (Hierarchy of Developments) (Scotland) Regulations 2009 states that development will be classed as a "*major development*" where the applicable threshold in Schedule 1 of the Regulations is met or exceeded. In this instance, the proposal would be classified as 'Other Development', with the threshold for being considered a 'Major' development as where:

(a) The gross floor space of any building, structure or erection constructed as a result of such development is or exceeds 5,000 square metres;

or

(b) The area of the site is or exceed 2 hectares.

In this instance, the Site area exceeds 2 hectares and therefore triggers the second threshold.

As such, it is anticipated that determination of the Application will be delegated to the Renfrewshire Council Planning Committee.

4.2 Town and Country Planning (Scotland) Act 1997

Section 25 of the Town and Country Planning (Scotland) Act 1997 (as amended) states:

"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 37(2) of the Town and Country Planning (Scotland) Act 1997 (as amended) states:

"In dealing with such an application the authority shall have regard to the provisions of the development plan, so far as material to the application, and to any other material considerations".

Based on the above, the process for determining a planning application made under the Town and Country Planning (Scotland) Act 1997 (as amended) can therefore be defined as:

- Identification and consideration of the key provisions within the Development Plan;
- Clarification of whether the Development is in accordance with the Development Plan;
- Identification and consideration of relevant material considerations; and
- Conclusions on whether planning consent is justified.

Section 5 of this Statement reviews the key planning policies that are applicable to the Site; Section 6 reviews the relevant policy and legislation as it pertains to energy and climate change; and Section 7 addresses any further material considerations. The aim of these Sections is to establish the key implications of the Development and consider its standing against the determination criteria listed above, in order to aid the Council during the determination process.

5 ENERGY POLICY AND LEGISLATION

The proposed Development does not generate energy but is still a key component for the successful transition to reliable, accessible clean energy.

This section of the Statement sets out the international, European, UK and Scottish energy policy. It provides the framework of international agreements and binding targets upon which national energy policy is based. The international and national policy described and summarised below demonstrates the need for renewable energy, from which the Development can draw a high level of support.

Renewable energy developments are dependent upon weather conditions and therefore, the energy management facilities and the sustainable storage of energy for the purpose of balancing supply and demand, is an integral component of a successful renewable energy industry. As such this Development should be viewed in the context of supporting the achievement of energy policy and legislation

All of these sections demonstrate clear and consistent policy support at all levels, from international to local, for the deployment of renewable energy to combat climate change, diversify the mix of energy sources, achieve greater security of supply, and to achieve legally binding renewable energy targets. The Development would provide valuable infrastructure to help Scotland meet its renewable energy production targets, while supporting CO_2 reduction to combat climate change and increasing the security of supply of electricity.

5.1 International and European Policy Context

On 12 December 2015, 196 Parties to the UN Framework Convention on Climate Change (UNFCCC) adopted the Paris Agreement, a legally-binding framework for an internationally coordinated effort to tackle climate change. The UK is legally bound through commitment to the Paris Agreement.

The Renewable Energy Directive[8] 2009/28/EC establishes an overall policy for the production and promotion of energy from renewable sources in the EU. It requires the EU to fulfil at least 20% of its total energy needs with renewables by 2020 – to be achieved through the attainment of individual national targets. All EU countries must also ensure that at least 10% of their transport fuels come from renewable sources by 2020.

On 30 November 2016, the Commission published a proposal for a revised Renewable Energy Directive to make the EU a global leader in renewable energy and ensure that the target of at least 27% renewables in the final energy consumption in the EU by 2030 is met.

On 11th December 2018, the revised renewable energy directive[9] came into force and sets the course for a growing demand for renewable energy projects across Europe, whilst setting a target of cutting emissions by at least 40% below 1990 levels by 2030.

On 14 June 2018 the European Commission, the European Parliament and the European Council reached a political agreement which includes a binding renewable energy target for the EU for 2030 of 32%, with a clause for upwards revision by 2023[10]. This agreement sets the course for a growing demand for renewable energy projects across Europe.

[8] European Commission (2018) Renewable Energy Directive [Online] Available at: https://ec.europa.eu/energy/en/topics/renewable-energy/renewable-energy-directive (Accessed 24/11/2020)

[9] Official Journal of the European Union (2018) Directive (EU) 2018/2001 of the European Parliament and of the Council [Online] Available at: https://eur-lex.europa.eu/legal-content/EN/TXT/?uri=uriserv:OJ.L_.2018.328.01.0082.01.ENG&toc=OJ:L:2018:328:TOC (Accessed 24/11/2020)

[10] European Commission (2018) Renewable Energy: Moving towards a low carbon economy [Online] Available at: https://ec.europa.eu/energy/en/topics/renewable-energy (Accessed 24/11/2020)

The 2017 Renewable Energy Progress Report[11] summarises the progress countries within the EU are making towards 2020 targets. Based on the 2017 publication, the UK is currently projected to miss its 2020 targets, indicating a need for further renewable energy developments.

It is a requirement of the new EU Governance regulations for member countries to draft National Energy & Climate Plans (NECPs) and submit the plans to the European Commission by 31 December 2019. Despite the UK's intention to leave the EU before this submission deadline, a draft NECP was published on 29 January 2019[12].

In May 2019, the UK's Committee on Climate Change published a report[13] on net-zero greenhouse gas emissions with decarbonisation recommendations, which informed the Government's amendment to the Climate Change Act[14] targeting 100% decarbonisation by 2050.

As discussed throughout this Statement, the development of the Greener Grid Park and technologies with the ability to store and distribute energy is important the successful and efficient operation of the renewable energy industry. As such, consenting the Development would aid in the ability to achieve international CO_2 emissions reduction targets, as well as the renewable energy targets.

5.2 Scottish Climate Change and Energy Policy

The following documents set out the Scottish Government's commitment to cut carbon emissions and combat climate change through the deployment of renewable energy, and sets out the national energy strategy alongside energy planning statistics. As stressed throughout, energy management and storage is a key component of successful renewable energy planning.

5.2.1 *Climate Change (Scotland) Act 2009*

The Climate Change (Scotland) Act 2009[15] ("the Climate Change Act") creates a long-term framework for the current and successive administrations in Scotland to ensure a reduction in Scottish greenhouse gas emissions by 80% by 2050 with an interim milestone of 42% by 2020.

5.2.2 *Climate Change (Emissions Reduction Targets) (Scotland) Act 2019[16]*

The Scottish government introduced the new Climate Change (Emissions Reduction Targets) (Scotland) Bill ("the Climate Change Bill") to Parliament on 23rd May 2018, and was passed on 25th September 2019, and received Royal Assent on 31st October 2019, becoming the Climate Change (Emissions Reduction Targets) (Scotland) Act 2019.

[11] EUR-Lex (2017) Report from the Commission to the European Parliament, the Council, the European Economic and Social Committee and the Committee of the Regions: Renewable Energy Progress Report [Online] Available at: http://eurlex.europa.eu/legal-content/EN/TXT/PDF/?uri=CELEX:52017DC0057&qid=1488449105433&from=EN (Accessed 24/11/2020)

[12] UK Government, Department for Business, Energy & Industrial Strategy (2019) The UK's Draft Integrated National Energy and Climate Plan (NECP) [Online] Available at: https://www.gov.uk/government/publications/uk-national-energy-and-climate-plan-necp (Accessed 24/11/2020)

[13] Committee on Climate Change (2019) Net Zero: The UK's contribution to stopping global warming [Online] Available at https://www.theccc.org.uk/wp-content/uploads/2019/05/Net-Zero-The-UKs-contribution-to-stopping-global-warming.pdf (Accessed 24/11/2020)

[14] UK Government (2017) The Climate Change Act 2008 (2050 Target Amendment) Order 2019 [Online] Available at: https://www.theccc.org.uk/wp-content/uploads/2019/05/Net-Zero-The-UKs-contribution-to-stopping-global-warming.pdf (Accessed 24/11/2020)

[15] Scottish Government (2009) The Climate Change (Scotland) Act 2009 [Online] Available at: http://www.legislation.gov.uk/asp/2009/12/contents (Accessed 24/11/2020)

[16] Scottish Government (2019) Climate Change (Emissions Reduction Targets) (Scotland) Act 2019 [Online] Available at: http://www.legislation.gov.uk/asp/2019/15/contents/enacted (Accessed 24/11/2020)

The Act amends the Climate Change (Scotland) Act 2009 and originally increased the 2050 target to 90%. In line with advice from the Committee on Climate Change ('CCC') on 2 May 2019, the Scottish Government amended the Climate Change Bill to set a target date of 2045 for reaching net-zero emissions[17].

Setting a 'carbon neutral', net-zero target of 2045 is ambitious and ahead of the rest of the United Kingdom's target of 2050.The Government has set ambitious targets for reduction of carbon emissions. Projects, such as the Development play a key role in aiding the decarbonisation of the energy sector.

5.2.3 *Climate Change Plan – Third Report on Proposals and Policies 2018-2032[18]*

This document was published in September 2018 and provides an overview of the Scottish Government's climate change plan 2018-2032. The document contains the most up-to-date renewable electricity generation data available from UK BEIS.

"In 2015, Scotland had reduced its emission by 41% from the 1990 baseline, and in 2017 Scotland generated 68.1% of its electricity requirements from renewables. Scotland's success in decarbonising electricity paves the way for transformational change across all sectors of the economy and society, particularly as electricity will be increasingly important as a power source for heat and transport."

The plan envisages that by 2032 Scotland will have reduced its emissions by 66% relative to the baseline, while growing the economy, increasing the wellbeing of the people of Scotland and protecting and enhancing the natural environment. Furthermore, the plan proposes that by 2032 Scotland's electricity system will be largely decarbonised and increasingly important as a power source for heat and transport.

The Development is in keeping with the climate change plan, as it has the potential to aid CO_2 emissions reduction, have positive effect on the local and national economy, whilst leaving a minimal footprint on the environment.

5.2.4 *Protecting Scotland's Future: the Government's Programme for Scotland 2019-2020[19]*

In September 2019, the Scottish Government published the Government's Programme 2019-20 which sets out the actions the Government will take in the forthcoming year. The Programme reiterates the continuous support for renewable energy development, achieving a net zero emissions target by 2045, and adaptation to climate change.

The Programme states that the Government will bring to market a £3 billion portfolio of projects, including renewables, waste and construction, ready for green finance investment.

If consented, the Development has the potential make a contribution to the Government's objectives for reduction of emissions, by increasing the efficiency of the renewables industry; as well as encouraging investment in renewable energy, to achieve sustainable economic growth.

[17] Scottish Government (2019) Climate Change (Emissions Reduction Targets) (Scotland) Bill Marshalled List of Amendments for Stage 2 [Online] Available at https://www.parliament.scot/S5_Bills/Climate%20Change%20(Emissions%20Reduction%20Targets)%20(Scotland)%20Bill/SPBill30MLS052019.pdf (Accessed 24/11/2020)

[18] Scottish Government (2018) Climate Change Plan 2018 – 2032 [Online] Available at: http://www.low-carbonscotland.scot/wp-content/uploads/2018/11/Climate-Change-Plan-Scotland.pdf (Accessed 24/11/2020)

[19] Scottish Government (2019) Protecting Scotland's Future: the Government's Programme for Scotland 2019-2020 [Online] Available at: https://www.gov.scot/programme-for-government/ (Accessed 24/11/2020)

5.2.5 *Routemap for Renewable Energy in Scotland*

Securing low carbon energy supplies is a key element in achieving the target of reducing emissions by 80% by 2050 with an interim milestone of 42% by 2020. In recognition of this the Scottish Government has set further targets which include producing 100% of the country's demand for electricity from renewable sources by 2020. This is detailed within the 2020 Routemap for Renewable Energy in Scotland[20]. The Development has the potential to aid the achievement of these targets.

5.2.6 *Scottish Energy Strategy*

The Scottish Energy Strategy 2017[21]: The Future of Energy in Scotland sets out the Scottish Government's vision for the future energy system in Scotland, to 2050. It articulates the priorities for an integrated system-wide approach that considers both the use and supply of energy for heat, power and transport. The Energy Strategy is designed to strengthen the development of local energy, protect and empower consumers, and support Scotland's climate change ambitions while tackling poor energy provision.

The Scottish Energy Strategy recognises the important role that energy storage and management has to play in the success of the industry.

> *Development in storage technology, and its application at a range of scales… will also have a major influence on our future energy system.*
>
> *Our ability to store and control energy is changing dramatically, driven by growing demand for storage, technological innovation, smarter networks and the growth of the digital economy. Scotland's energy future will be, and needs to be, much more flexible than in the past, with far more choice for domestic and business users.*

The development is in line with the national vision set out in the Scottish Energy Strategy.

[20] Scottish Government (2015) 2020 Routemap for Renewable Energy in Scotland – Update [Online] Available at: http://www.gov.scot/Resource/0048/00485407.pdf (Accessed 24/11/2020)

[21] Scottish Government (2017) Scottish Energy Strategy [Online] Available at: https://www.gov.scot/energystrategy (Accessed 24/11/2020)

6 PLANNING POLICY

6.1 National Planning Framework 3 (NPF3)

On the 23rd of June 2014, the National Planning Framework 3 (NPF3)[22] was laid in the Scottish Parliament as required by statute alongside associated documentation. It is the Scottish Government's third NPF and spatial expression of the Government's Economic Strategy.

NPF3 sets the context for development planning in Scotland and a framework for the spatial development of Scotland as a whole. It outlines the Scottish Government's development priorities over the next 20-30 years and focuses on supporting sustainable economic growth and the transition to a low carbon economy. Together NPF3 and the Scottish Planning Policy (SPP) applied at the national, strategic and local level, will help the planning system to deliver the vision and outcomes for Scotland for sustainable and low carbon economy. NPF3 reiterates the ambition to achieve at least an 80% reduction in greenhouse gas emissions by 2050, where planning plays a key role in delivery of this target.

Although NPF3 does not specifically address Greener Grid Parks, the Scottish Government *"aims to ensure that all parts of Scotland make best use of their assets to build a sustainable future",* as stated in paragraph 2.6, while paragraph 2.7 supports *"emerging technologies for renewable energy"*. NPF3 establishes Scotland as a leader for renewable energy development and advises that onshore wind will continue to make a significant contribution to the diversification of the energy mix.

It is important to recognise that energy management and storage plays an invaluable role in the success of renewable energy. Being able to store and distribute energy as efficiently as possible is a key component to the ongoing success of the renewable energy industry.

Greener Grid Parks support the flexible operation of decarbonisation through balancing electricity supply and demand disparities currently experienced by the National Grid. These are due to the existing and likely increased levels of renewable energy generation already approved within Scotland. This will build on the momentum generated by the extensive national and international energy, climate change and low carbon initiatives, as outlined in Section 6 of this Statement, and will benefit consumers, communities and businesses throughout the country.

6.2 Scottish Planning Policy (SPP)

SPP (2014)[23] is a non-statutory statement of Scottish Government policy on how nationally important land use planning matters should be addressed across the country. SPP sets out the Scottish Government's policy on land use planning and therefore should be afforded significant weight in the determination process for planning applications; however, paragraph (iii) of SPP acknowledges that *"it is for the decision-maker to determine the appropriate weight in each case"*.

Outcome 2: a low carbon place states its aim as *"reducing our carbon emissions and adapting to climate change"*. As stated previously, the Development is designed to support the flexible operation of the National Grid and decarbonisation of electricity supply.

SPP states in paragraph 93 that the planning system should:

- Promote business and industrial development that increases economic activity while safeguarding and enhancing the natural and built environments as national assets;

[22] Scottish Government (2014) National Planning Framework 3 [Online] Available at: https://www.gov.scot/publications/national-planning-framework-3/ (Accessed 25/11/2020)
[23] Scottish Government (2014) Scottish Planning Policy [Online] Available at: http://www.gov.scot/Resource/0045/00453827.pdf (Accessed 25/11/20)

- Allocate sites that meet the diverse needs of the different sectors and sizes of business which are important to the plan area in a way which is flexible enough to accommodate changing circumstances and allow the realisation of new opportunities; and
- Give due weight to net economic benefit of proposed development.

The Development will make use of an allocated site, diversify the local economy and safeguard the natural and built environment.

The Development is considered to be an intrinsic aspect of a successful, clean energy system. Being able to manage the supply and demand of energy output aids renewable energy developments which, by their nature, fluctuate. It will also have a positive effect on carbon savings and a significant positive effect when considered cumulatively with UK-wide renewable energy deployment.

SPP paragraph 154 states that the planning system should:

- "Support the transformational change to a low carbon economy, consistent with national objections and targets including delivering 30% of overall energy demand from renewable sources by 2020, 11% of heat demand from renewable sources by 2020, and the equivalent of 100% of electricity demand from renewable sources by 2020."

The Development is in line with the principles set out in Paragraph 154, as, while it will not contribute to energy generation, it will make a direct contribution to the renewable energy targets by improving energy efficiency and security of supply. As such it draws significant support from SPP.

6.3 The Development Plan

The Development Plan is the primary consideration when determining planning applications, and forms the basis for the assessment of the Development in this Statement.

The Site falls under the jurisdiction of Renfrewshire Council as the local planning authority, therefore, the statutory Development Plan comprises of the following:

- Renfrewshire Local Development Plan (2014) ('RLDP'); and
- Glasgow and Clyde Valley Strategic Development Plan (2017) ('Clydeplan').

The following adopted statutory LDP Supplementary Guidance ('SG') documents are relevant to the consideration of the application:

- New Development Supplementary Guidance (2014).

6.3.1 *Renfrewshire Local Development Plan 2014*

6.3.1.1 Introduction

The Planning Act states that decisions on planning applications must be made in accordance with the Development Plan, unless material considerations indicate otherwise.

Formally adopted on 28th August 2014, the Renfrewshire Local Development Plan[24] ('RLDP') aims to represent the view of the Council, setting out policies and proposals that aim to facilitate sustainable growth and sustainable development in Renfrewshire over the next 10 years.

The RLDP is accompanied by the New Development Supplementary Guidance, which is assessed in Section 6.4 of this Statement.

[24] Renfrewshire Council (2014) *Renfrewshire Local Development Plan* [online] Available at: http://www.renfrewshire.gov.uk/media/1546/Adopted-Renfrewshire-Local-Development-Plan---August-2014/pdf/Adopted_Local_Development_Plan_August_2014.pdf?m=1458234969273 (Accessed 25/11/2020)

The RLDP reflects the Scottish Government's core principles and objectives as expressed in the National Planning Framework 3 (NPF3) and Scottish Planning Policy (SPP) including:

- Building a low carbon economy;
- An increased emphasis on place making;
- Respecting and maximising environmental assets;
- A sustainable approach to growth and development; and
- Well-connected places.

Sections 6.3.1.2 – 6.3.1.6 address each of the relevant policies contained within RLDP and provides a determination of the Development's compliance with each policy. Complete policy wording is not necessarily included. Full wording is available in the RLDP.

6.3.1.2 Policy I5 - Flooding and Drainage

Policy I5 states that new development should avoid areas susceptible to flooding and is required to demonstrate promotion of sustainable flood risk management measures by implementing suitable drainage infrastructure. This policy notes that development should not have an impact on existing drainage infrastructure or increase the risk of flooding

Any development will be required to be assessed against the criteria and guidance set out in the New Development SG and be supported by an assessment of flood risk when deemed necessary by the planning authority.

As demonstrated in the up to date SEPA flood risk map[25], the on-site infrastructure would not be located in an area susceptible to flooding.

The Application is accompanied by a Drainage Impact Assessment, which details a suitable surface water drainage scheme, maintenance and management, in line with Policy I5, to ensure acceptable, policy-compliance drainage measures.

Assessment against the SG is considered in Section 6.4 of this Statement. Subject to compliance with the SG criteria, it is demonstrated that the Proposed Development fully complies with RLDP Policy I5.

6.3.1.3 Policy I6 – Renewable and Low Carbon Energy Developments

Policy I6 states that:

Renewable and low carbon energy developments will be supported in principle where they are appropriate in terms of location, siting and design having regard to any individual or cumulative significant effects on:

- Local environment, landscape character, built, natural or cultural heritage;
- Amenity of existing or allocated uses;
- Visual amenity;
- Outdoor sport and recreation interest; and
- The safe and efficient use of the airport, flight activity, navigation, flight paths and Ministry of Defence surveillance system.

Any development will require to comply with the above criteria as well as the details outlines in the New Development SG.

The construction of a Greener Grid Park should be considered in the context of Policy I6, despite not being for the generation of renewable energy.

[25] Scottish Environment Protection Agency (2020) *Flood Maps* [online] Available at: http://map.sepa.org.uk/floodmap/map.htm (Accessed 25/11/2020)

It is considered that the matter of effects on airports, flights, navigation and MoD surveillance is relevant to the development of onshore wind and is not a consideration for the development for a relatively low-grade Greener Grid Park.

As can be seen from the Council's pre-application and screening advise, visual impacts on amenity should be mitigated through appropriate screening and considered in the design of the Proposed Development. Following a landscape and visual site survey and assessment, a landscape planting plan has been produced and is submitted with this Application. This ensures that visual impacts are mitigated as far as reasonably practicable. Other aspects of design, including boundary treatment and the colour of the proposed infrastructure components have been used to reduce the visual impacts further.

The proximity of the Proposed Development to the existing Neilston substation ensures that the Site is congruous with the current landscape and surrounding use, as it would adhere to the setting as somewhat industrial and influenced by man-made infrastructure.

The Site is designated as green belt, and further assessment against the relevant green belt policy is contained within Section 6.3.4; whilst natural heritage and build heritage policies are assessed in Section 6.3.5 and 6.3.6, respectively. It is considered that, subject to compliance with these policies, the Proposed Development fully complied with RLDP Policy I6.

6.3.1.4 Policy ENV1 – Green Belt

Policy ENV1 states that the green belt aims to identify appropriate locations to support planned growth, where required, as well as maintaining the identity of settlements, protecting and enhancing the landscape setting of an area.

Appropriate development within the green belt will be considered acceptable where it can be demonstrated that it is compatible with the provisions of the New Development SG. Support will be given to diversification within the green belt.

The determination by the Council during the pre-application process, was that the Proposed Development is considered of an appropriate type for the green belt. The Proposed Development would be adjacent to the existing substation and would be in-keeping with the somewhat industrial character of the surrounding area. The Application is accompanied by a landscape assessment determining the acceptability of impact upon the landscape. As such, it is considered that the Proposed Development, subject to accordance with the New Development SG, fully complies with Policy ENV1.

6.3.1.5 Policy ENV2 – Natural Heritage

Policy ENV2 states that developments must not have an adverse effect on the integrity of sites protected for their natural conservation interest or which have the potential to protect and enhance designated sites and the wider biodiversity and geodiversity of the area.

All proposals will be assessed in terms of the cumulative impact of the development based on the precautionary principle considering effects on the following:

- Natura 2000 and Ramsar Sites;
- Protected Species;
- SSSI's;
- LNRs, SINCs and wildlife corridors;
- Biodiversity;
- Trees – Ancient and semi-natural woodland, TPOs and Conservation areas.

Development and change of uses affecting those outlined above will be assessed against criteria set out in the New Development SG.

As per table 3.1 within the accompanying Landscape and Visual Appraisal, there are no relevant designation for protection under Policy ENV2 present within a 2km radius study area. The accompanying Preliminary Ecological Appraisal concludes that "no designated site will be impacted by the Development". As such the Proposed Development, subject to accordance with the New Development SG, fully complies with Policy ENV2

6.3.1.6 Policy ENV3 – Built Heritage

Policy ENV3 states that built 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, where appropriate. Development proposals within or in the vicinity of built heritage assets will be required to demonstrate that there is no negative impact to their site or setting and is in accordance with the provisions set out in the New Development SG.

As per the accompanying Landscape and Visual Appraisal, there are no conservation areas, scheduled monuments or gardens and designed landscapes within a Detailed Study Area (2km radius). There is one listed building located approximately 0.9km north east of the Site, however it is outwith the Zone of Theoretical Visibility ('ZTV') with no anticipated views. With regards to this assessment, it is considered that the Proposed Development fully complies with Policy ENV3.

6.3.1.7 Summary

As demonstrated above, the Development is compliant with RLDP Policies I5, I6, ENV1, ENV2, ENV3.

The Proposed Development can draw considerable support from the in-principle support for renewable and low carbon developments under Policy I6, and the highlighted context of energy and decarbonisation objectives shown in Section 5 of this Statement.

6.3.2 *New Development Supplementary Guidance*

The New Development Supplementary Guidance (2014)[26] ('New Development SG') documents form part of the RLDP and provides additional details to policy contained within the Plan

The following prescriptions within the New Development SG are relevant to the consideration of the Proposed Development:

- Flooding and Drainage;
- Renewable and Low Carbon Technologies;
- Green Belt;
- Natural Heritage;
- Built Heritage.

6.3.2.1 Flooding and Drainage

The SG sets out comprehensive criteria for development proposals to comply with the principles of sustainable flood risk management. These principles have been taken account of in the production of the Drainage Impact Assessment. The proposed drainage strategy and management measures presented within this assessment ensure that the Proposed Development fully accords with the flooding and drainage requirements set out in the SG.

[26] Renfrewshire Council (2014) *Renfrewshire Local Development Plan New Development Supplementary Guidance* [online] Available at: http://www.renfrewshire.gov.uk/media/1549/Adopted-LDP-New-Development-Supplementary-Guidance---Adopted-November-2014/pdf/LDP_SupplementaryGuidance2014_13.pdf?m=1458234873297 (Accessed 26/11/2020)

6.3.2.2 Renewable and Low Carbon Technologies

The SG states that the Council is supportive of development aiding the transition to low carbon and the Proposed Development has demonstrated compliance with the relevant required criteria set out in this section of the SG.

There are no significant impacts, individually or cumulatively on the surrounding properties and amenity; a landscape planting plan has been provided to minimise visual intrusion; the site selection process has been addressed in Section 1.4 of this Statement; and transport impact has been assessed as acceptable as, when operational, the Site will be unmanned.

As such, the Proposed Development demonstrates compliance with the relevant criteria within this section of the SG.

6.3.2.3 Green Belt

The SG states renewable energy developments are an acceptable form of development within the green belt.

The SG also lists development criteria against which development proposals in the green belt should be assessed. The Site does not fall under prime agricultural land as per the first criteria. Traffic and access have been sensitively designed in consultation with the Council. There are accompanying landscape and drainage assessment which address the requirement of this section of the SG. Design details are provided in the accompanying Design and Access Statement. The accompanying PEA demonstrates that there are no detrimental effects on the natural environment. Other criteria under this section of the SG is not considered relevant due to the nature of the Site and the Proposed Development.

The Proposed Development demonstrates full compliance with the relevant criteria within this section of the SG.

6.3.2.4 Natural Heritage

The SG states that:

> *Natural heritage makes an important contribution to the local character, identity and quality of an area. A good natural environment, water environment, landscape setting and a range of biodiversity compliment a place and these assess should be protected with opportunities for enhancement.*

It is considered that this is not prescriptive to what should specifically be included in development proposals; however, it is a guiding set of principles of which consideration has been given throughout the Proposed Development.

The supporting PEA, LVA and Drainage Assessment demonstrate the acceptability of the Proposed Development on the relevant criteria.

The Proposed Development demonstrates full compliance with the relevant criteria within this section of the SG.

6.3.2.5 Built Heritage

As acknowledged, the Proposed Development is not within or adjacent to a conservation area, and will not have any impact upon listed buildings, ancient monuments or archaeological designations.

The Proposed Development demonstrates full compliance with the relevant criteria within this section of the SG.

6.3.2.6 Summary

The SG provides greater context to the relevant RLDP policies. In assessing the proposals against the accompanying criteria within the SG, it is demonstrated that the Proposed Development accords with the principles relevant to the disciplines cited at Section 6.4.1.

The Development complies with the RLDP in its entirety, including the SG and as the primary consideration in determination, it is respectfully requested that the Application is approved.

6.3.3 *Clydeplan Strategic Development Plan*

The policy context of Clydeplan is consistent with the Scottish Government's National Planning Framework 3 ('NPF3') and Scottish Planning Policy ('SPP'). Clydeplan sets a clear vision and spatial strategy for the area, focusing on the key land use and development issues. Both of the aforementioned publications follow 4 primary planning outcomes, which in turn also influence Clydeplan:

- Successful and sustainable place;
- Low carbon place;
- Natural and resilient place; and
- Connected place.

The aim of Clydeplan is to create a Glasgow city region which, by the year 2036, is able to successfully conform with the above outcomes, with individual supporting policies helping to achieve each of the outcomes, including policy which encourages positive development in areas including; Low Carbon Heat and Electricity, Green Network and Infrastructure, and effective use of Natural Resources, all of which can be considered relevant to this Development.

Policy 10: Delivering Heat and Electricity is of particular relevance to the Development and states that *"In support of the transition to a low carbon economy and realisation of the Vision and Spatial Development Strategy, support should be given, where appropriate, to alternative renewable technologies and associated infrastructure."*

The Development complies with the vision of Clydeplan, and Policy 10 in particular, in its appropriate use of land to contribute to decarbonisation objectives through balancing supply and demand for electricity.

6.4 Emerging Planning Policy

6.4.1 *NPF4*

The Scottish Government have started work to prepare NPF4, which will replace NPF3 and incorporate SPP. It is anticipated that NPF4 will be produced with a focus on green energy and will "*provide a spatial planning response to the Global climate emergency*"[27]. This is indicative of the growing national investment in renewable energy, which must filter through to local level and consent suitable and sustainable renewable energy developments such as this one.

The revised NPF4 will also allow for the national planning framework and policies to reflect the up-to-date renewable energy guidance and climate change targets.

[27] The Scottish Government (2019) Planning and Architecture Blog: National Planning Framework 4 – The Essentials! [Online] Available at: https://blogs.gov.scot/planning-architecture/2019/10/08/national-planning-framework-4-the-essentials/ (Accessed 26/11/2020)

6.4.2 *Renfrewshire Local Development Plan 2*

Preparation has begun on producing the new local development plan. The new Renfrewshire Local Development Plan[28] ('the RLDP2') will provide an updated vision, spatial strategy, sustainable objective and updated policies for directing growth in Renfrewshire for the next 10 years.

The Council submitted the RLDP2 and associated documents to the Scottish Ministers for Examination on January 31st 2020. The Examination is still ongoing as of the time of this Statement's production, and, as per the Renfrewshire Council Development Plan Scheme 2020[29], the RLDP2 is anticipated to be adopted between January and February 2021.

It is considered that the determination of this Application may be reached prior to the adoption of the RLDP2, however, in the event that it is not, it is appropriate for this Statement to acknowledge any policy updates that may be relevant to the determination of this Application.

Table 1 below acknowledges the relevant RLDP2 policies and provides a determination of the Proposed Development's compliance with the policy. Where no difference exists between the RLDP 2020 policy and the equivalent RLDP policy, this is stated within the determination and it is considered that the compliance stated in Section 6.3 and 6.4 would remain for RLDP2. Full policy wording is not always included in Table 2. For full policy wording, see the RLDP2.

Table 1 – RLDP2 Policy Assessment

RLDP2 Policy	**Relevant Criteria**	**Determination of Compliance**
I3 – Flooding and Drainage	New development requires to avoid areas susceptible to flooding and developers will be required to demonstrate promotion of sustainable flood risk management measures by implementing suitable drainage infrastructure. Development must not have an adverse impact on existing drainage infrastructure, increase the risk of flooding or result in the loss of land that has the potential to contribute to the management of flood risk through natural flood management, green infrastructure or as part of a flood management scheme. Flooding and drainage measures require to have a positive effect on the water environment as well as the natural heritage interests of the site and land surrounding the site.	There is no substantive change to the wording of RLDP2 Policy I3, when compare to RLDP Policy I5. Therefore, the determination of compliance in Section 6.3.2 of this Statement would remain in the event that RLDP2 was adopted prior to the determination of this Application.

[28] Renfrewshire Council (2019) *Renfrewshire Local Development Plan Proposed Plan 2019* [Online] Available at: http://www.renfrewshire.gov.uk/media/11243/Renfrewshire-Local-Development-Plan-Proposed-Plan-2019/pdf/Proposed_Plan_v9_21.03.2019.pdf?m=1580483098757 (Accessed 26/11/2020)

[29] Renfrewshire Council (2019) *Renfrewshire Local Development Plan Development Plan Scheme 202* [Online] Available at: http://www.renfrewshire.gov.uk/media/12498/Development-Plan-Scheme-2020/pdf/Development_Plan_Scheme_2020.pdf?m=1598611638430 (Accessed 26/11/2020)

	All development proposals require to be supported by an assessment of flood risk and drainage when deemed necessary by the Planning Authority	
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. Renewable and low carbon energy development, including the delivery of heat networks, will be considered in the 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 the Ministry of Defence surveillance system.	The only substantive change in the wording to RLDP2 Policy I4, when compared to RLDP Policy I6, is the inclusion of having regard to air quality, noise, glare and shadow flicker. Issues of glare and shadow flicker are considered to relate only to the development of onshore wind and do not apply to the Proposed Development. Noise and air quality effects where discussed with the Council during the pre-application process and were determined not to be of relevant consideration for the Proposed Development. As such the determination of policy compliance in Section 6.3.3 of this Statement would not alter in the event that RLDP2 was adopted prior to the determination of this Application.
ENV1 – Green Belt	The green belt in Renfrewshire maintains the identity of settlements, protecting and enhancing the landscape setting of an area and protecting and promoting access opportunities to open space. Development within the green belt will only be considered acceptable where it can be demonstrated that it is compatible with the provisions of the New Development Supplementary	The wording of policy ENV 1 is unchanged from the adopted RLDP. The only changed to the development criteria within the New SG relate to impact on wild land and green network and active travel routes, which are not considered relevant to the

	Guidance. Support will be given to developments that are able to demonstrate diversification within green belt and rural areas which promote new employment, tourism opportunities and / or community benefits.	determination of the Application. As such the determination of policy compliance in Section 6.3.4 of this Statement would not alter in the event that RLDP2 was adopted prior to the determination of this Application.
ENV2 – 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. Developments must not have an adverse effect on the integrity of sites protected for their natural conservation interest or the wider biodiversity and geo-diversity of the area. All proposals will be assessed in terms of the mitigation hierarchy of Avoid/Reduce/Compensate, the cumulative impact of development based on the precautionary principle and should protect, and where possible enhance: • Natura 2000 and Ramsar Sites; • Protected Species; • SSSI's; • Wild land; • LNRs, SINCs and wildlife corridors; • Biodiversity; • Landscape character and setting • Clyde Muirshiel Regional Park; • Trees – Ancient and semi-natural woodland in line with the Scottish Government's Control of Woodland Removal Policy and Clydeplan's Forestry and Woodland Strategy, significant trees including those covered by Tree Preservation Orders,	The only substantive change to RLDP2 Policy ENV2 when compared to RLDP Policy ENV2 is the inclusion of the requirement to assess impact upon wild land, landscape character and setting and Clyde Muirshiel Regional Park. The only one of these that is deemed relevant to the Proposed Development is landscape character and setting which is suitably considered in the accompanying LVA. As such the determination of policy compliance in Section 6.3.5 of this Statement would not alter in the event that RLDP2 was adopted prior to the determination of this Application.

	hedgerows and trees within Conservation Areas. Development and changes of use affecting those outlined above will be assessed against criteria set out in the New Development Supplementary Guidance.	
ENV3 – 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, where appropriate. Development proposals, including enabling development, within or in the vicinity of built and cultural heritage assets will be required to demonstrate that there is no negative impact to their site or setting and is in accordance with the provisions set out in the New Development Supplementary Guidance. There will be support for the retention and sympathetic restoration, appropriate maintenance and sensitive management of listed building to enable them to remain in active use. The layout, design, materials, scale, siting and use o any development which will affect a listed building, or its setting should be sensitive to the buildings character, local landscape character, appearance and setting.	There are no substantive changes to the wording of RLDP2 Policy ENV3, compared to RLDP Policy ENV3. As such the determination of policy compliance in Section 6.3.6 of this Statement would not alter in the event that RLDP2 was adopted prior to the determination of this Application.

It is considered that the Development fully complies with the policies and strategies of the emerging RLDP2, just as it does with the adopted RLDP.

7 RELEVANT MATERIAL CONSIDERATIONS

The Planning Act states that a decision on a planning application must be made in accordance with the Development Plan unless material considerations indicate otherwise. This Section assesses the Development against material considerations.

7.1 Energy Storage and Management Drivers

There is a focus at International, European and national level on how the UK can deliver secure, clean and affordable electricity to consumers. The UK is legally bound through the Climate Change (Scotland) Act (2009) to reduce carbon emissions and through Renewable Energy Directive 2009/28/EC to increase electricity consumption from renewable resources.

Greener Grid Parks will play an important role in achieving this. A report by the National Infrastructure Commission (2016)[30] estimates that smart power systems in the UK, which include energy storage and management *"could save consumers up to £8 billion a year by 2030, help the UK meet its 2050 carbon targets and secure the UK's energy supply for generations."*

The Development is designed to support the flexible operation of the National Grid and decarbonisation of electricity supply. The Development will import and export electricity however, will not generate any additional electricity nor have any on-site emissions of CO_2. As such, the Development will contribute to the legal obligations of the Climate Change Act 2008, as amended in 2019 to incorporate the 2050 Net Zero target.

7.2 Climate Emergency

Renfrewshire Council declared a climate emergency in June 2019. In its Climate Emergency Declaration, the Council has made a commitment to accelerate efforts to reduce the carbon footprint and to become a carbon neutral local authority by 2030.

7.3 Planning Practice Guidance

The National Planning Policy Guidance[31] ('the NPPG') provides web-based advice across a variety of planning matters which is continuously updated. The NPPG section 'Renewable and Low Carbon Economy' identifies the important role that the planning system has in increasing renewable energy, whilst also setting out that need does not automatically override environmental protection. The NPPG also advises LPAs not to rule out renewable and low carbon energy through inflexible rules on buffer zones and separation distances.

The NPPG, whilst providing useful advice, does not change national planning policy, which remains the NPPF.

7.4 UK Renewable Energy Roadmap

The UK Renewable Energy Roadmap (2011)[32] ('the Roadmap') sets out the UK Government's commitment to increasing the use of renewable energy. The Roadmap identifies the National Policy Statements as a potential means of improving the delivery of renewable energy development through their advice on need, mitigation and delivery in a sustainable manner.

[30] UK Government (2016) Smart Power: A National Infrastructure Commission Report [Online] Available at: https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/505218/IC_Energy_Report_web.pdf (Accessed 26/11/20)

[31] Ministry of Housing, Communities & Local Government (2016) *Planning Practice Guidance* [Online] Available at http://planningguidance.communities.gov.uk/blog/guidance/ (Accessed 26/11/2020)

[32] Department of Energy and Climate Change (2011) *The UK Renewable Energy Roadmap* [Online] Available at: https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/48128/2167-uk-renewable-energy roadmap.pdf (Accessed 26/11/2020)

The UK Renewable Energy Roadmap Update (2013)[33] ('the Roadmap Update') reports on the progress that has been made in the renewable energy sector since the publication of the Roadmap. The Roadmap Update re-iterates Central Government's commitment to renewable energy (Paragraph 1):

"The Government strongly supports renewable energy as part of a diverse, low carbon and secure energy mix. Alongside gas, low-carbon transport fuels, nuclear power and carbon capture and storage, renewable energy offers the UK a wide range of benefits from economic growth, energy security and climate change perspective."

The Roadmap Update indicates that tools to help balance the supply and demand of electricity, including energy storage and management, are required to remove constraints on the level of renewable energy which the grid can support.

The Roadmap Update also recognises that a number of barriers continue to present challenges to delivery, including pre-consent delays.

7.5 Net Zero – The UK's Contribution to Stopping Global Warming

In May 2019 the Committee on Climate Change published Net Zero – The UK's Contribution to Stopping Global Warming. The report recommends a new emissions target for the UK: net zero greenhouse gas emissions by 2050.

The Report highlights the falling cost of key renewable technologies including battery storage and advises that flexibility in the energy supply (e.g. demand response, storage and interconnection) should be encouraged by policy and regulatory frameworks.

On 27 June 2019, the Climate Change Act 2008 was amended to introduce a target for at least a 100% reduction in greenhouse gas emissions (compared to 1990 levels) in the UK[34] by 2050. This 'net zero' target is likely to affect and increase future Government renewable and low carbon energy targets and create a more positive policy environment for energy storage and management development.

7.6 Reducing UK Emissions – 2020 Committee on Climate Change Report to Parliament

The 2020 Committee on Climate Change Report to Parliament[35] was published in June 2020 and provides a review of Government efforts over the previous 12 months with regards to Climate Change. This Report highlights that the UK is not on course to meet the 2050 Net Zero commitment or making adequate progress in preparing for climate change.

7.7 UK Clean Growth Strategy: Leading the Way to a Low Carbon Future

The UK Clean Growth Strategy (2017)[36] ('the Strategy') builds on the UK's carbon emissions reduction progress. The report conveys the Government's objective of achieving clean growth, whilst ensuring an affordable energy supply for businesses and consumers. The Strategy is in-line with the 2015 Paris Agreement where 195 countries agreed to stretch national targets to keep the global temperature rise below 2C degrees. Therefore, further

[33] Department for Energy and Climate Change (2013) *UK Renewable Energy Roadmap Update 2013* [Online] Available at: https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/255182/UK_Renewable_Energy_Roadmap_-_5_November_-_FINAL_DOCUMENT_FOR_PUBLICATIO___.pdf (Accessed 26/11/2020)

[34] UK Government (2019) *The Climate Change Act 2008* (2050 Target Amendment) Order 2019 (2019 No. 1056) [Online] Available at: http://www.legislation.gov.uk/uksi/2019/1056/made (Accessed 26/11/2020)

[35] Committee on Climate Change (2020) *Reducing UK Emissions – 2020 Progress Report to Parliament* [Online] Available at: https://www.theccc.org.uk/publication/reducing-uk-emissions-2020-progress-report-to-parliament/ (Accessed 26/11/2020)

[36] UK Government (2017) *Government reaffirms commitment to lead the world in cost-effective clean growth* [Online] Available at: https://www.gov.uk/government/news/government-reaffirms-commitment-to-lead-the-world-in-cost-effective-clean-growth (Accessed 26/11/2020)

actions and investment will be needed to ensure the shift to clean growth in the coming years, where the clean growth plays a central role in the UK's Industrial Strategy.

To meet the fourth and fifth carbon budgets (2023-2027, and 2028-2032), there will be a need for a significant acceleration in the pace of decarbonisation, while ensuring energy security supply at minimum cost to both industry and domestic consumers. One of the 'Clean Growth Innovation Challenges' identified within the Strategy is to develop smart energy systems so that clean technologies can integrate smoothly in the energy supply network.

7.8 The UK's Draft Integrated National Energy and Climate Plan ('NECP')

The UK NECP[37] was produced in January 2019 and sets out the UK Government's climate and energy objectives, targets, policies and measures covering the five dimensions of the Energy Union. The NECP makes clear that in order to meet the UK's 2050 climate change target, improvements in energy efficiency and energy management are required. This includes smart technologies such as energy storage and system balancing.

7.9 Upgrading Our Energy System – Smart Systems and Flexibility Plan ('SSFP')

In July 2017, BEIS and Ofgem published Upgrading our Energy System: Smart Systems and Flexibility Plan[38], which sets out 29 actions that the UK Government, Ofgem, and industry will undertake to remove barriers to smart technologies, including storage; enable smart homes and businesses; and make electricity markets work towards flexibility. The SSFP states that:

> *By harnessing the potential of energy storage, demand-side response and smarter business models, we have an opportunity to upgrade to one of the most efficient, productive energy systems in the world. This is central to how we deliver secure, affordable and clean energy now and in the future.*

The Government aims to implement the actions in the Plan by 2022, enabling the electricity system to work more flexibly and efficiently, potentially unlocking £17-40 billion in savings across the electricity system by 2050. Other benefits of improving energy systems include a reduction in the amount of additional energy generation required and improvements to the functioning of the grid.

7.10 Socio-Economic Benefit

The Development will result in at least 5 full time equivalent jobs during operation. The Development will result in economic opportunities for local and regional contractors both for construction activities themselves and throughout the supply chain. The investment in the Development has the potential to generate a range of economic opportunities for local businesses, most notably employment opportunities and local spending.

Construction contracts will be placed for services and materials and local sourcing will be preferred where possible, however this is subject to competitive tendering and constrained by the specialist nature of the equipment. During the operational phase much of the maintenance will be undertaken remotely, although specialist jobs will be retained for the maintenance of the Development and other similar plants.

[37] Department for Business, Energy and Industrial Strategy (2019) *The UK's Draft Integrated National Energy and Climate Plan* [Online] Available at: https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/774235/national_energy_and_climate_plan.pdf (Accessed 26/11/2020)

[38] Department for Business, Energy and Industrial Strategy and Office of Gas and Electricity Markets (2017) *Upgrading Our Energy System – Smart Systems and Flexibility Plan* [Online] Available at: https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/633442/upgrading-our-energy-system-july-2017.pdf (Accessed 26/11/2020)

7.11 Summary

The material considerations cited in Section 7 provide weight in favour of the Development. The effects from the Development are modest and are outweighed by the benefits of the Development, particularly the Development's contribution to providing energy management services in Renfrewshire. The Development will support the flexible operation of the National Grid and decarbonisation of electricity supply.

8 CONCLUSION

In accordance with the Planning Act, the Development should be determined in accordance with the Development Plan unless material considerations indicate otherwise. This Statement demonstrates that the Development complies with the relevant policies of the RLDP, most notably including an in-principle support for the type of development under Policy I6 and as a from of acceptable development in the green belt under Policy ENV1.

The Application must also be considered in the wider context of energy requirements and decarbonisation objectives at a local, national and global level. The Development fits an agenda of addressing the climate emergency at all levels. Balancing the supply and demand of energy is valuable to ensuring the efficiency of the renewable energy industry.

The policy compliance and energy context must be regarded as comprehensive evidence in support of consenting the Proposed Development.

In summary, the key benefits of the Development are as follows:

- The Development complies with Development Plan and can draw support from material considerations;
- The Development is designed to support the flexible operation of the National Grid and decarbonisation of electricity supply in support of EU targets and national planning policy. The Development will not generate any additional electricity nor have any on-site emissions of CO_2;
- The Development is located in close proximity to Neilston substation which will avoid the need for lengthy transmission cables, ensure efficient connection to the National Grid and minimising disturbance to the community;
- The technical information, provided in the appendices to this Statement, was done so with consultation with the Council;
- A palisade and electric security fence provides security for the Development;
- As a new, innovative technology, the Development will diversify the economic mix in Renfrewshire;
- As the existing road network was capable of accommodating the larger infrastructure of the neighbouring substation, it is anticipated that the Development construction traffic will not create any significant effects nor require major upgrades; and
- As agreed with the Council, appropriate environmental reports (including landscape, ecology and drainage) have been produced.

The Proposed Development complies with the RLDP in its entirety and as the primary consideration in determination, it is respectfully requested that the Application is approved.