



HOUSTON SOLAR PHOTOVOLTAIC (PV) AND ENERGY STORAGE FACILITY

Planning Support Statement

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REPORT

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1 INTRODUCTION

1.1 Background

This Planning Support Statement (“the Planning Statement”) has been prepared to accompany a Section 36 application (“the Application”) submitted to Scottish Government’s Energy Consents Unit (“ECU”) by RPS, on behalf of EEB57 Limited (“the Applicant”) for the:

Proposed construction and operation of an electricity generating station with installed capacity in excess of 50 megawatts (MW) but not exceeding 100MW, consisting of a solar PV farm of approximately 75MW capacity and a battery energy storage facility of approximately 25MW capacity, with ancillary development (“the Proposed Development”).

The Proposed Development is located on three parcels of land within the Renfrewshire Council Area, comprising agricultural lands measuring approximately c. 129 hectares (c. 318 acres). At its nearest point, the northernmost parcel of land (Houston North) is located approximately 0.5km northeast of Houston village. It is situated to the north of the B790 Houston Road and is bisected by Turningshaw Road. Access to Houston North will be taken from existing access lanes onto the Turningshaw Road. The other two land parcels (Houston South) are located to the south of the B790 Houston Road, situated to the east and west of Moss Road. At their nearest point these lands are located approximately 1km east of Houston village.

This application is submitted under Section 36 of the Electricity Act 1989 and seeks a direction under section 57(2) of the Town and Country (Scotland) Act 1997 that planning permission for the development be deemed to be granted. Section 36 of the Electricity Act 1989 (“the Electricity Act”) applies to proposals for the construction, extension or operation of an onshore electricity generating station whose capacity exceeds (or, when extended, will exceed) 50MW. The Scottish Ministers will have to evaluate whether the Applicant has complied with the duties set out in Schedule 9 of the Electricity Act. The determination will have regard to all relevant material considerations, one of which will be relevant aspects of the statutory Development Plan, which is the Renfrewshire Local Development Plan 2021.

The aim of this Statement is to present findings of a planning and environmental appraisal of the Proposed Development within the context of the relevant statutory Development Plan, and comprises of the following sections:

1. Introduction;
2. Proposed Development;
3. Legislative Context;
4. Planning & Environmental Context;
5. Other Material Considerations; and
6. Conclusions.

1.2 The Applicant

Elgin Energy EsCo Ltd ‘Elgin Energy’ is a leading international and independent solar development Company set up in 2009. Elgin Energy has extensive experience in delivering projects from initial landowner engagement to project completion having initially begun development in the UK in 2011, followed by Ireland in 2015 and Australia in 2018.

Currently, Elgin Energy has successfully delivered 230MW of solar energy across 21 projects in the UK, providing the equivalent of 75,000 homes with clean energy on an annual basis. This includes Scotland’s largest solar farm at Errol Estate and the largest operational solar farm on the island of Ireland at Bann Road. The company has successfully obtained consent for 1200MW across 63 projects including Scotland’s first Energy Consent Unit (ECU) application at Milltown Airfield. A further 6GW + 3GW storage projects are at late stages of development across the UK, Ireland and Australia.

Elgin are committed to the Scottish energy market, and it is hoped that their projects will make a significant contribution to Scotland’s targets to reduce national emissions of all greenhouse gases to net-zero by 2045 at the latest, with interim targets of at least 75% by 2030, 90% by 2040 and 100% by 2045.

Due to the nature of the project and the consenting regime, a Special Purpose Vehicle has been set up specifically for this project. As such, EEB57 Limited will be the applicant for this project.

1.3 Proposed Development

The land-holding upon which the development is proposed measures c. 129 hectares / 318 acres. Panels will not be placed on this entire area. The proposed development area has emerged through a process of detailed baseline environmental assessment, site visits, constraints mapping and as a result of feedback from stakeholders during the pre-consent processes including engagement with the Council, statutory authorities, ECU and the public.

When constructed it is anticipated that the solar farm will have an installed capacity in excess of 50MW but not exceeding 100MW, consisting of a solar PV farm of approximately 75MW capacity and a battery energy storage system (BESS) facility of approximately 25MW. It is proposed to locate the battery facility beside the proposed Primary Substation within the site and near to the south-western boundary of one of the Houston South land parcels.

Additional project components are listed in the bullet points below and described in greater detail within subsequent text:

- Photovoltaic (PV) Solar Panels erected on steel frames in south-facing arrays;
- A primary substation, comprising electrical infrastructure and associated buildings – including control building – to enable the proposed solar facility to be controlled, monitored, metered and connected to the network. These elements will be located within a compound typically measuring c.20m x c.20m;
- It is proposed to connect the on-site primary substation at Houston South to Houston North via a small connecting substation, via an underground cable connection;
- 26 No. Inverter Substation Containers on concrete plinths, typically measuring between 7.5m and 10m (l) x 2.2m and 3m (w) x 2.2 and 3m (h) to be located across the site;
- A number of strategically located CCTV security cameras (3m high);
- Perimeter post and wire “deer” fencing (c.2.45m high);
- Associated Battery Energy Storage System (BESS) facility;
- Access to Houston North is via existing field entrances on either side of both N Mains Road and Turningshaw Road; and access to Houston South is via an entrance on Auchans Road and entrances on either side of Moss Road;
- Two No. temporary construction compounds; and
- Associated internal service tracks.

When operational the site will support a dual renewable/farming use and the overwhelming land area will remain agricultural. Sheep grazing will take place across the entire area and will not be impeded by the proposed infrastructure.

1.3.1 Benefits of the Proposed Development

The siting, design and aims of the Proposed Development have been given due consideration throughout the design development process. There are a number of clear benefits deemed to arise from the Proposed Development, which will be highlighted throughout this Statement.

These Proposed Development benefits have been summarised below:

- The Proposed Development complies with the relevant Development Plan and can draw support from a number of material considerations;
- The Development Site is not in a sensitive location in respect of critical environmental considerations including natural and cultural heritage, hydrology and flood risk considerations. A robust and comprehensive suite of environmental assessments accompany the submission to assess the impact on the above matters and other considerations including Agricultural Land Quality and Landscape and Visual

Impact. These independent reports are prepared by industry experts and demonstrate that there are no significant impacts associated with the proposal;

- The Proposed Development is sensitively located in a rural location with only a limited number of sensitive receptors in the vicinity, none of whom will suffer significant adverse impacts from the Proposed Development;
- The Proposed Development benefits from use of the existing accesses from N Mains Road, Turningshaw Road, Auchans Road and Moss Road. The Proposed Development is well connected to the local traffic network, avoiding any significant disturbance to surrounding roadways and communities;
- The proposal will result in the removal of intensive farming practices from the site including ploughing and spreading of slurry. The site will therefore revert to a more “traditional” style of farming and will be grazed by livestock. This is likely to result in ecological benefits across the site. Additionally, there are built-in ecological enhancement measures as set out with Section 4.3.4 of the Ecological Impact Assessment. This includes; ecological buffers around the site, seeding of the site with species rich grass mix and adoption of a grassland management plan, bug/bee hotels, bat and bird boxes. Overall the project is predicted to have beneficial effects for a number of those important ecological features that were assessed;
- The Development will result in the creation of 10 Full-Time-Equivalent (FTE) jobs during the operational period and approximately 200 direct FTE jobs during the construction phase;
- The design of the Proposed Development buildings has been taken into great consideration, and are considered to be appropriate and in keeping with and respectful of their immediate surroundings; and
- The Proposed Development will make a significant contribution to the delivery of Scotland’s ambitious renewable energy generation targets and assist in enhancing the efficiency and security of energy supply. The proposed development could have the ability to generate approximately 75,000,000 kilowatt hours (kWh) per annum powering over 20,000 homes.

The proposed BESS facility will provide benefits for both the system and local network:

- Battery storage is a key enabler of net zero. The electricity system needs to be fully zero carbon to reach our net zero targets, and battery storage is a source of clean, flexible capacity. National Grid has forecast that Great Britain needs more than 50GW of battery storage by 2050, up from around 2.4GW today.
- It provides a range of balancing services. National Grid spent £2.65 billion on system services to keep the electricity system in balance in 2021, and these costs are passed through to consumers. Battery storage gives National Grid additional sources for these balancing services, helping bring down costs and support the operation of the grid.
- It helps manage the volatility of renewables. With increasing renewable energy, the more variable the energy system becomes, and battery storage is uniquely placed to help manage this volatility by storing excess renewable energy and using this to deliver energy to the grid when the system is in need.
- It can provide locational benefits. Battery storage can provide local system services to distribution network operators to help manage the local grid, bringing down costs for consumers in that region.

1.4 Accompanying Documentation

The ECU Application Form is accompanied by the following documentation:

Table 1: Documents Comprising the Application

Title	Author
Agricultural Land Classification	Julia Tindale
Ecological Impact Assessment (EclA)	Nora Washbourne
Environmental Impact Assessment Screening	Catriona Morgan / Paul McKernan
Flood Risk Assessment	Diane McGinnis
Glint & Glare Study	Pager Power
Heritage Statement	Richard Conolly
Landscape & Visual Impact Assessment	Stuart Anderson
Noise Impact Assessment	Catriona Cooper
Planning Support Statement	Catriona Morgan

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Pre-Application Consultation Report	Catriona Morgan
Transport Statement	Conor O'Hara

Plans and drawings include the following:

Table 2: Drawings Accompanying the Application

Drawing Number	Drawing Title
1101-ELDERSLIE-001 Rev C	Site Location Plan
1101-ELDERSLIE-005 Rev B	Site Context Plan
1101-ELDERSLIE-002 Rev H	Site Layout Plan
ELGIN-BESS-001 Rev A	Typical BESS Unit
ELGIN-BESS-002 Rev A	Typical Power Conversion Station Unit
ELGIN-BESS-003	Typical Storage Container
ELGIN-FENCECCTV-001 Rev A	General Fence & CCTV Detail
ELGIN-INVERTER-001 Rev H	Typical Inverter Detail
ELGIN-PANEL-001 Rev E	Solar Panel Sections
Typical 33kv Switchgear DNO & Customer Elevations	Typical 33kV Switchgear Elevations DNO & Customer

2 PROPOSED DEVELOPMENT

2.1 Site Selection

The UK electricity network faces exceptional challenges to meet the government's target of reducing carbon emissions. This will largely be achieved through decommissioning carbon intensive plants and increasing low carbon generation such as wind and solar. Elgin Energy has undertaken a robust and effective site selection exercise to identify suitable areas for solar development to meet the electricity demand within this network area. Some locations have more inherent environmental sensitivities than others, and it is possible to avoid such sites in favour of those locations with less constraints. With the Houston Solar Farm and BESS proposal, the search for an appropriate location took the form of a three-staged progression as set out below:

Stage 1 – Regional Level

Examination at a regional level to identify areas deemed as potentially:

- Capable of hosting a viable installation capable of producing energy from the sun; and
- Capable of achieving planning permission for a solar energy installation when considered against all relevant environmental factors and within the context of relevant legislation and policy.

This stage of the process primarily involved desktop mapping and analysis to identify constraints at a regional level. It focused on:

- Examining the electricity network within Scotland to identify areas where there was available grid capacity to host a renewable project of this scale; and
- A parallel baseline environmental study to identify known major environmental constraints manifest through European and National designation boundaries including for example, however not exclusive of: National Landscape Designations; Special Areas of Conservation (SAC); Special Protection Areas (SAC); and Sites of Special Scientific Interest (SSSI).

By undertaking the above filtering exercise this process immediately began to identify areas within Scotland which were potentially more receptive to solar farm development. The area surrounding Houston was one such area identified for further investigation given that it was outside any such designation.

Stage 2 - Local Level

Upon determining it as broadly feasible to locate a solar farm within the general Johnstone area, a series of site visits were undertaken to identify potential land parcels which may be appropriate for solar development. This involved assessing sites against technical, environmental and practical criteria as listed below to ascertain, inter alia:

- Whether existing landscape features and topography would lend itself to solar development;
- The extent of landscape constraints and potential landscape and visual impacts associated with any proposal;
- An understanding of the ecological baseline within proposed land holdings and whether there were any local natural heritage designations not identified within the preceding regional level site trawl;
- The location of the proposed point of grid connection. There are benefits in having a site which is proximate to the point of connection as this not only helps to ensure overall fiscal viability but also minimises the risk of environmental impacts associated with same; and
- Appropriate land availability within the Johnstone area.

Within this area a number of separate land parcels and combinations of land parcels were considered and assessed through a series of feasibility studies and a more detailed examination of constraints. The constraints studies focused on identifying a preferred site option to bring forward to planning application stage.

Stage 3 - Micro Level

Those lands identified as preferred during the preceding site selection process (Stages 1 and 2) were subjected to further detailed consideration from a number of environmental perspectives including:

- Flood Risk;
- Contaminated Land Assessment;
- Ecology;
- Traffic Impact;
- Agricultural Land Use;
- Archaeology; and
- Glint & Glare.

Assessments in respect of each of the aforementioned topics took place and corresponding reports were prepared alongside this Planning Support Statement to accompany the resultant application for consent to the Scottish Government, Energy Consents Unit.

2.2 Site Selection Criteria

As stated above, the site selection process for a solar energy proposal is informed by assessment against a number of criteria:

Predicted Solar Resource: A number of solar irradiance databases such as SolarGiS, Meteonorm, and Photovoltaic Geographical Information System (PVGIS) were used to determine the predicted solar resource.

Landscape Constraints: Each solar farm site must be judged on its particular merits, taking account of factors including planning and environmental designations, the proximity of nationally designated landscapes, the proximity of settlements and the localised landscape setting within which it is proposed. A landscape and visual impact assessment accompanies the submission. The assessment concluded that whilst there may be moderate locally significant effects associated with the project during operation these are not assessed as significant further to the implementation of in-built mitigation.

Topography: When placed on site all panels will be orientated to face southwards thus maximising the potential output based on the daily trajectory of the sun, east through south towards west. Accordingly lands with gentle slopes in any direction, or which are south facing are preferred. The Houston site is gently sloping which lends itself to solar development. Critically the gradient of the site and its surroundings, as well as the intervening land uses and screening, ensures that the application site is not highly visible from any nearby settlement, nor are prolonged views available from the road network.

Proximity of Dwellings: In a regional context, solar farm proposals are fairly large in scale, covering anywhere between 50 and 300 acres in area. The greatest potential for impacts on dwellings and population centres generally manifest in terms of glint and glare and visual impacts. When operational solar farms and battery energy facilities do not generate emissions or result in any significant noise impacts. Efforts are made to choose sites which are as well separated from a proliferation of dwellings as is reasonably possible on the grounds that this minimises potential for sources of objection and conflict. The application site benefits from the fact that there are a low number of third party residential properties within the vicinity of the site and any impact on the sporadic dwelling houses is likely to be limited by the combination of topography, mature trees and vegetation and intervening land uses. It is appreciated that there are approximately 16 x dwellings in relatively close proximity to the Proposed Development parcels. The layout has evolved to mitigate potential impacts on these properties. This is supported by the findings of assessments in respect of landscape and visual impact, and glint and glare assessment that accompany this application.

Nature conservation constraints: In many cases, the presence of ecological interests of acknowledged importance is indicated by nature conservation designation. The Houston site does not overlap with any statutory or non-statutory nature conservation designation. A full Ecological Impact Assessment accompanies this Statement.

Further Environmental Constraints: In addition to those landscape, visual, and natural heritage constraints as well as those referred to in respect of dwellings above, the site selection process is undertaken cognisant of

further constraints including flooding regime, archaeological and cultural heritage resource and potential impacts on agricultural lands (Agricultural Land Classification).

Grid connection: It is anticipated that the Solar Farm and Storage facility will be connected to the network at an existing substation located south of the development at a voltage of 33kV. The grid connection route will be an underground cable either along the landowner's land, public road and/or third party land. This connection does not form part of the planning application.

Availability of land: Solar farm developments rely on the developer's ability to reach a commercial agreement with the current owner of the land. When considering potential sites for development Elgin Energy require land holdings of between 50 and 300 acres. Whilst these need not necessarily be within sole party ownership, this is often preferred. Whilst many landowners are interested in the potential of solar energy as a form of land diversification, there are others who are not. The Houston site has no constraints in respect of necessary land agreements.

Planning policies: A suite of planning legislation, policy and further material considerations are considered when assessing the appropriateness of a solar farm planning application - including that at European, National, Regional and local level. The development plan and emerging policies are taken into consideration when assessing potential solar farm sites, together with national guidance. Section 4 of this Statement provides a comprehensive Plans and Policies assessment. Policies at a European, National and Regional level will apply to all solar site proposals throughout Scotland. Only those local policies contained within the extant development plan will differ from site to site.

Access: Unlike other renewable projects (wind etc) solar farms do not require the delivery of any abnormal loads to the site. Rather the delivery of all components will be facilitated by standard HGV. The site is well connected to the local road network. The delivery route for components will be via the B790 Houston Road, and to Houston North via existing field entrances on either side of both N Mains Road and Turningshaw Road. Access to Houston South will be via an existing field entrance on the southern side of Auchans Road, and entrances on either side of Moss Road. Traffic movements will be greatest during construction which is anticipated to last 16 weeks. Even at their most onerous the change in traffic levels on the road network will be low and within the range of normal fluctuations that could be expected on the B790. During operation traffic to the site will be negligible and likely to be less than 1 per week by standard 4x4 for maintenance purposes. A Transport Statement confirming anticipated impacts accompanies the planning submission.

Cumulative effects: There is a need to carefully consider the cumulative effects of solar farms with other relevant existing or proposed developments within the area. The presence of other renewable energy generators (including the proposed solar farm to the east of the Proposed Development) and other proposals within the local area have been considered. Cumulative impacts can be particularly relevant from the perspective of noise, landscape and visual, ecology, and transport. Due to the combination of site location, topography and mature trees and vegetation within and surrounding the site, no significant cumulative impacts are anticipated.

Preferred Site: A number of sites were considered throughout the Renfrewshire area and wider region. These were typically discounted due a variety of:

- Potential grid connection issues including distance to the network;
- Lack of adequate available land upon which to place a viable solar and energy storage project;
- Unsuitable topography, or unsuitable landscape context; and
- Presence of incompatible planning and/or ecological designations.

The suite of environmental reports that accompany the application for consent illustrate that the emerging site is robust and that potential associated environmental impacts are within acceptable parameters.

2.3 Alternative Infrastructure Layout

Houston Solar Farm has evolved from the initial concept design to the Proposed Development as the Elgin Energy project team have continuously refined the scheme to respond to technical and environmental assessment outcomes, advice from the local planning authority, and community stakeholder consultation feedback.

From the outset the layout was underpinned by a series of basic design principles, including commitments to maintain all existing vegetation, to work with the topography and to avoid cut and fill on site. Within these basic parameters however the initial intention was to maximise panel coverage within a sensitive manner.

The following infrastructure layouts identify how the design has evolved through the engagement and environmental assessment process.

In November 2020 RPS initiated Pre-Application Discussions (PAD) with Renfrewshire Council, on behalf of Elgin Energy. Figure 1 below demonstrates the red line boundary of the emerging preferred area within the Elderslie Estate (blue line), which was brought forward as part of the PAD with the Council.

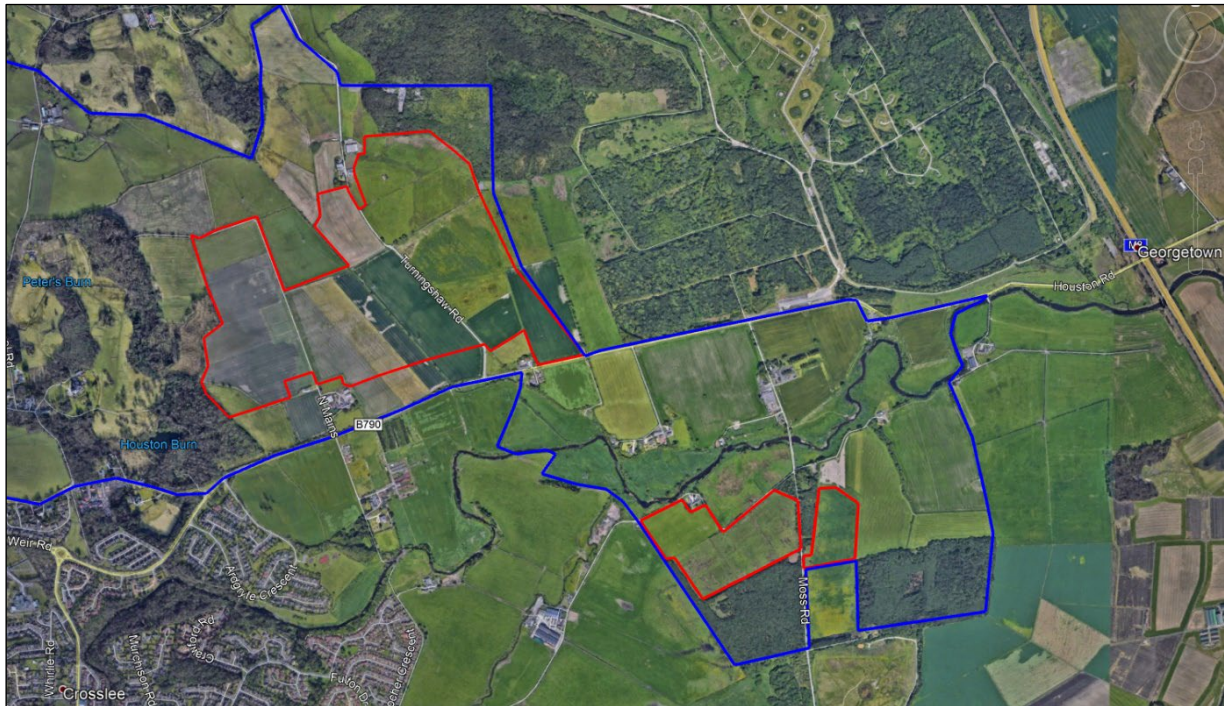


Figure 1: Preferred lands brought forward for consideration as part of PAD with Renfrewshire Council

Figure 1 illustrates the red line area as three development parcels, one parcel located to the north of B790 Houston Road, and two parcels located to the south of B790 Houston Road.

In August 2022 RPS resumed Pre-Application Discussions with Renfrewshire Council. Further to preliminary landscape, heritage and ecological assessments and associated information, Elgin Energy began to develop an interim layout which was the subject of the Applicant's extensive Pre-Application Consultation (PAC) process. Figure 2 below illustrates the initial Proposed Development layout.

A significant linear break is clearly visible in the northern parcel of the development site (Houston North) which separates the developable area going east to west. Baseline research revealed that there are two development constraints in this location, Barochan Burn and an overhead line. The area of constraint measures c.30m which will be left free of development. This accounts for the overhead line as well as an associated buffer area as advised by Scottish Power Energy Networks.

Although site selection work had already confirmed that the proposed lands were largely devoid of environmental constraint, as outcomes from ongoing environmental surveys became known, these were fed into the iterative design process. Ecological surveys found that there were thirty-nine trees within the site and along the site boundary with potential to support roosting bats. As a result, panels were pulled back by 30m from trees with bat roost potential. The layout also developed to allow a 10m buffer to watercourses within the site as a precaution against impacts on the aquatic environment.

During the PAC process the applicant also reached out to nearby residents and landowners to seek their views on the development as well as the extent of the emerging layout. Whilst some landowners were more open to engagement than others the applicant continued to employ a sensitive and robust approach to layout development.

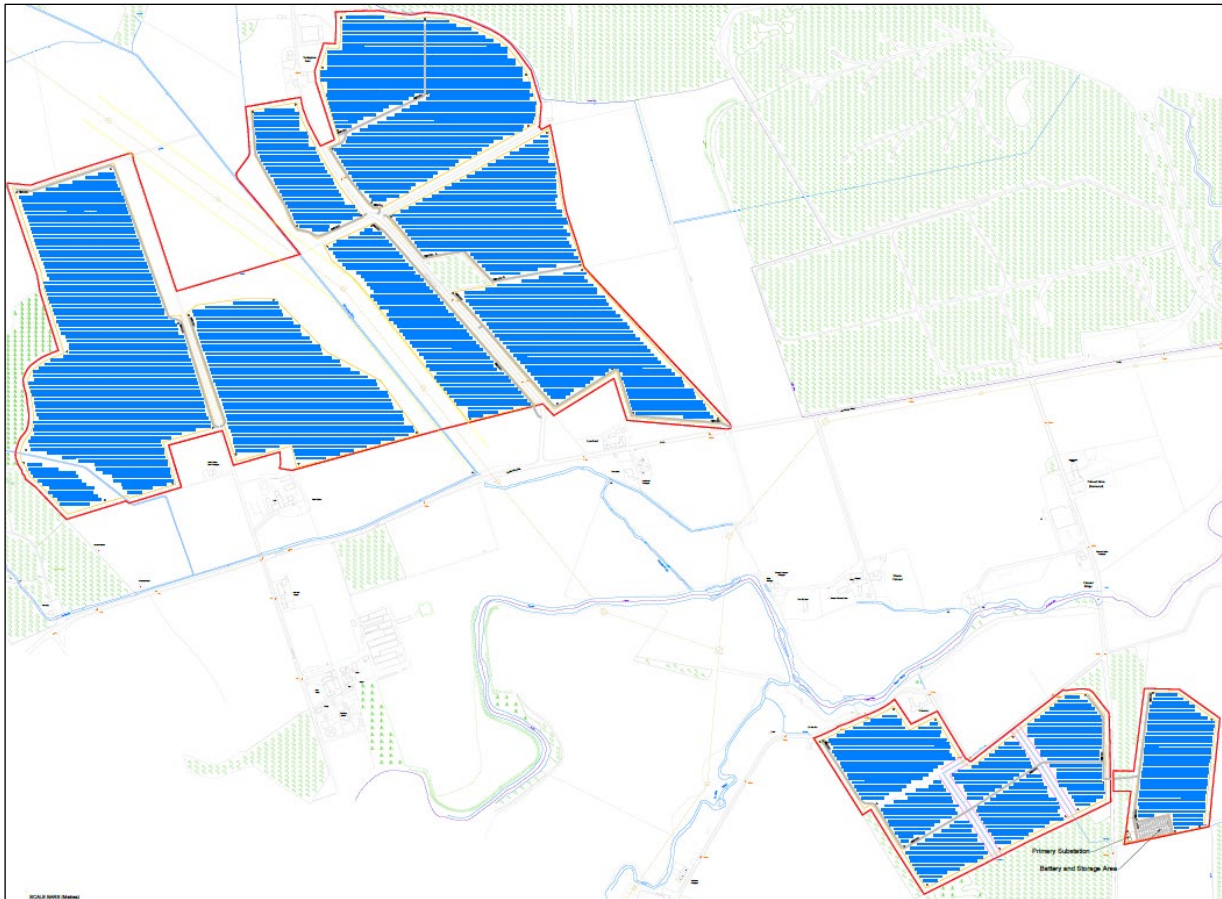


Figure 2: Proposed Development Layout for Pre-Application Consultation

This process of engagement proceeded in parallel with continuing environmental surveys and landscape analysis, leading to the Proposed Development which has a reduced ‘developed’ solar farm area along with areas dedicated to landscape and ecological enhancements as follows:

- In the northern portion of the site – Areas of panels were removed from localised high points to the west (adjacent to Houston Wood) and north-east (east of Turningshaw Road) to limit the landscape and visual impacts;
- In the northern portion of the site – Areas of panels were removed adjacent to Turningshaw Road and Houston Road, to address concerns from local residents regarding potential impacts on existing views towards the north;
- In the southern portion of the site – Areas of panels were removed from two large fields around the Knowes properties to address concerns from these residents regarding potential impacts on existing views towards the south;
- Panels were set back from trees with bat roost potential;
- A tailored landscaping scheme was integrated into the emerging layout to augment existing landscaping, enhance biodiversity and mitigate potential visual impacts.

The site boundary has also been extended to include two route options for an underground cable connecting Houston North and Houston South.

Figure 3 below provides an extract of the final emerging layout which accompanies the planning submission. As stated in Section 1.3 above, the final red line area measures c. 129 hectares / 318 acres. The iterative design process means that panels will only be placed on 72.7 hectares / 179.6 acres within this wider area.

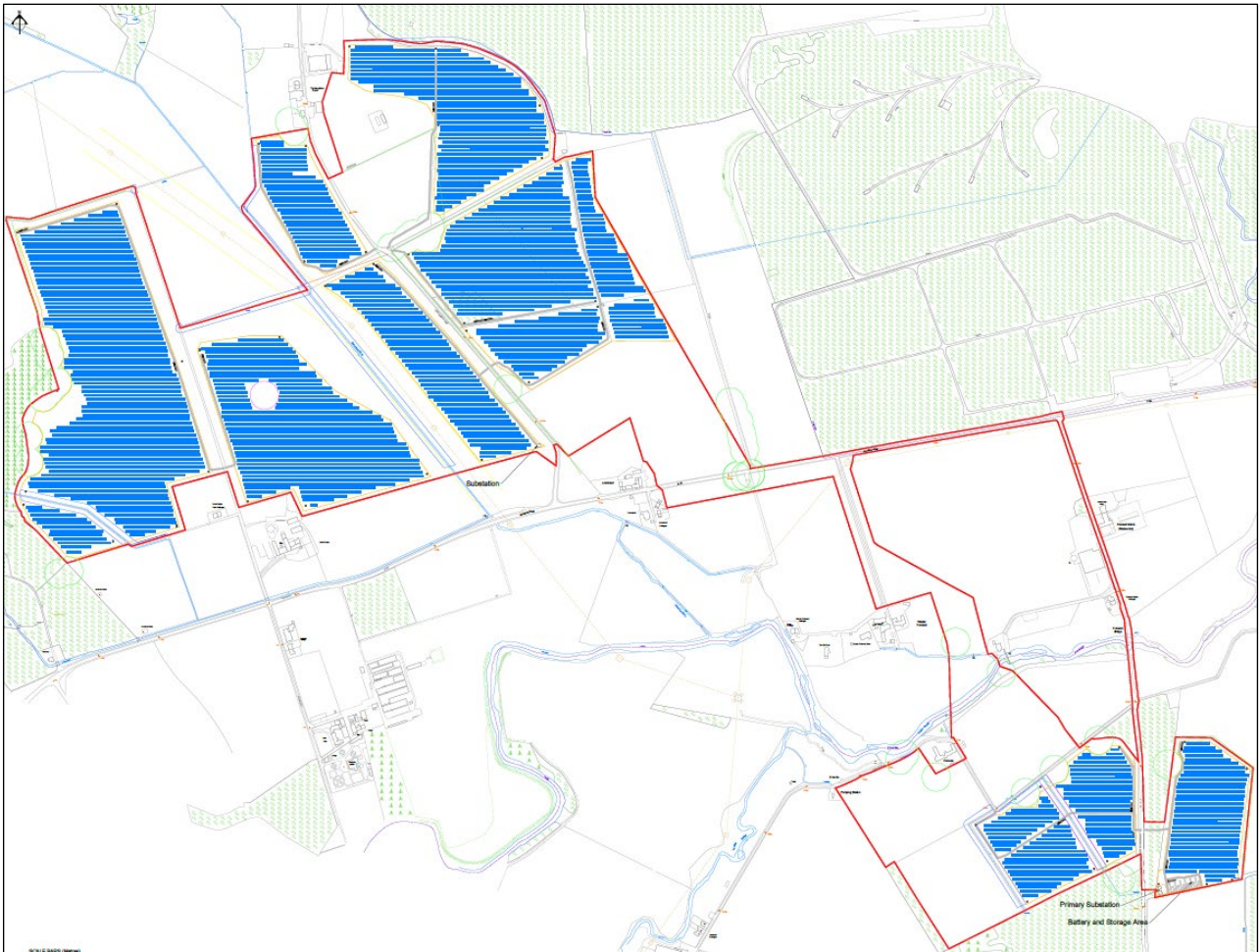


Figure 3: Final Design Layout

2.4 Alternative Design Options

Mounting System

A number of alternative design options are proposed by which panels will be fixed to the ground. Options are summarised as single post; table post or concrete base type which includes a shallow concrete shoe as a mitigation option in areas of archaeological sensitivity (Refer to Section 2.7.2 below).

Boundary Fencing

During initial development stages it was proposed to surround the site with standard metal paladin fencing. Based on feedback received during the public consultation exercise it has been agreed to change this to post and wire deer fencing. This design iteration is proposed as more aesthetically pleasing and typically rural option to the paladin alternative. It has been agreed to raise this fence 10cm off the ground to ensure unrestricted passage throughout the site for badgers and other small mammals as an environmental mitigation measure.

Palisade fencing, however, will be used to surround the primary substation and Energy Storage compounds, as due to their nature a more secure means of security is required.

Grid Connection

Connectivity to the grid is a key aspect of site selection, and is referred to above. Notwithstanding the identified route of connection which is yet to be determined, it remained an option for Elgin to connect to the grid via overhead or underground lines. Whilst underground lines are significantly more expensive to install, Elgin have committed to this approach as a further environmental mitigation measure to off-set impacts including those landscape and visual impacts associated with overhead lines.

2.5 Site Description

As stated previously, the Proposed Development is located on three parcels of land within the Renfrewshire Council Area. At its nearest point, the northernmost parcel of land (Houston North) is located approximately 0.5km northeast of Houston village. It is situated to the north of the B790 Houston Road and is bisected by Turningshaw Road. The other two land parcels (Houston South) are located to the south of the B790 Houston Road, situated to the east and west of Moss Road. At their nearest point the lands are located approximately 1km east of Houston village.

In strategic terms, the site is situated centrally within the County of Renfrewshire within western central Scotland, approximately 11 miles west of Glasgow City Centre and c. 12 miles south of Dumbarton. The site is positioned between the villages of Houston/Crosslee (c. 2 miles west) and Renfrew (c. 6 miles east) and is directly north of the town of Johnstone and village of Elderslie.

The northern site comprises agricultural land, primarily improved pasture, north of Houston Road, located on either side of two country lanes (Turningshaw Road and N Main Road). There are electricity pylons and overhead cable running north-west to south-east across the field parcel between Turningshaw Road and N Mains Road. The surrounding lands are mainly further agricultural fields which form part of the wider estate and by Houston Wood which forms part of the western extent of the site. Surrounding land uses include agricultural farm dwellings, a Clay Target Shooting School and Paintball centre. The topography of the site is predominantly flat with only one area of notable undulation located at a bend along Turningshaw Road. All of the lands can be accessed via Houston Road.

The southern site also comprises improved pasture lands used for grazing sheep and cattle, with the westernmost field parcel (south of Auchan Road) bounded to the south by a densely wooded area. The field towards the right of Moss Road is screened from view as it is bound by dense tree covering to the west. The topography of the site is predominantly flat in nature. All lands are accessed via Houston Road.

2.6 Planning History

A review of the Planning history on the subject site has been undertaken using Renfrewshire Local Authority website, to identify if there are any planning permissions on, or in close proximity to the subject site. Whilst no pertinent permissions were identified on the subject lands, a number of relevant Screening Determinations in respect of the lands are notable. These are summarised in Table 3 below:

Table 3: Application Site Planning History

Reference	Address	Description	Status	Determination Date
15/0325/EO	Turningshaw Farm Turningshaw Road Houston Johnstone	Screening Opinion as to whether the proposed solar farm would require an Environmental Impact Assessment	EIA not required	29/06/2015
15/0687/EO	Auchans Farm (Site A3) Auchans Road Houston Johnstone PA6 7EE	Screening Opinion as to whether the proposed solar farm would require an Environmental Impact Assessment	EIA not required	16/11/2015
15/0686/EO	Auchans Farm (Site A2) Auchans Road Houston Johnstone PA6 7EE	Screening Opinion as to whether the proposed solar farm would require	EIA not required	16/11/2015

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		an Environmental Impact Assessment		
15/0326/EO	Site 100 metres North-West of Moss Cottage Moss Road Linwood Paisley	Screening Opinion as to whether the proposed solar farm would require an Environmental Impact Assessment	EIA not required	29/06/2015
15/0685/EO	Auchans Farm (Site A1) Auchans Road Houston Johnstone PA6 7EE	Screening Opinion as to whether the proposed solar farm would require an Environmental Impact Assessment	EIA not required	16/11/2015

Planning applications and permissions within a 5km radius of the Proposed Development and relating to the development of energy infrastructure are summarised in Table 4 below:

Table 4: Wider Planning History

Reference	Address	Description	Status	Determination Date
23/0018/PP	Former Gasholder Station At Junction With Underwood Road Well Street Paisley	Erection of a battery energy storage system	Granted	23.05.2023
22/0582/PP	Site Between Nether Southbar And East Fulwood Greenock Road Inchinnan	Erection of solar park and associated infrastructure including substations, boundary fencing and access tracks	Granted	24.01.2023
22/0746/PP	Site 150 Metres East Of Walkinshaw Gardens Barnsford Road & Caledonia Way Glasgow Airport Paisley	Proposed solar array development incorporating installation of ground-mounted, rooftop and carport solar panels (with a generating capacity of up to 19.9 megawatts (MW)) and associated access, plant and machinery, car port structures, infrastructure and planting.	Granted	06.04.2023
21/1594/PN	Site 200 Metres West Of Whitehouse Of Milliken Bridge Of Weir Road Brookfield Johnstone	Erection of Battery Storage Facility up to 50MW including compound of energy storage equipment, meter building, security cameras, and fencing	Proposal of Application Notice Acceptable	25.11.2021

These developments have been considered in respect of cumulative impact within this application's Landscape and Visual Impact Assessment (LVIA).

Approved Developments

With regards to the approved development (22/0582/PP), which was approved in January 2023 on land between Nether Southbar and East Fulwood Greenock Road, Inchinnan for the erection of a solar park and associated infrastructure including substations, boundary fencing and access tracks, known as Inchinnan Solar Park, a review of currently available information has been undertaken. This approved solar farm has yet to commence construction at the time of the LVIA. The application site lies approximately 2.8km from the north-eastern site boundary of the Proposed Development. However, there is approximately 1.6km of mature woodland between the two sites and the M8 motorway and railway line that are both on raised embankments above the adjacent lower lying and flat landscape which all combine to provide significant physical screening between each development. As the proposed solar farm development and approved solar farm development

will be well screened from each other, the Proposed Development will result in negligible cumulative impact to the surrounding landscape due to the character of surrounding landscape, screening by woodland blocks and coniferous plantations and M8 and railway embankments.

The second application (22/0746/PP) was approved in May 2023 on land within Glasgow Airport, for the erection of a solar development including ground-mounted, rooftop and carport solar panels, associated access, plant and machinery, car port structures, infrastructure and planting. This approved solar farm has yet to commence construction at the time of the LVIA. The application site lies approximately 3.7km to the south-eastern boundary of the Proposed Development site, and the significant distance and screening from the Proposed Development means that there will not be a significant impact upon the character of the surrounding area.

In summary when considering the Proposed Development in combination with this approved development in proximity to the Proposed Development there will be no significant cumulative landscape or visual impact.

Relevant Applications

In relation to the other relevant planning application, an Application of Planning Notice (21/1594/PN) was submitted in 2021 in relation to a Battery Storage Facility including compound of equipment. The full planning application has yet to be submitted on this site.

2.7 Project Details

2.7.1 Solar Panels

The proposed panels will typically measure 2.4m by 1.3 m. These will be mounted in frame tables at an inclination of typically less than 30 degrees depending upon localised topography. Each frame table will incorporate typically either 48 or 60 and 24 or 30 panels and will be supported on steel/aluminium posts/frames that will be pushed or screwed into the ground to depths of up to 1.5m. The front bottom edge of the panels will be typically 0.8m above existing ground level and within a range of 500mm to 1.2m, again depending on local topography. Overall panel heights from ground level will be in a range of between 2.4 to 3.2m. The spacing between the arrays will vary between 2-8 metres.

All panels placed on the site will be orientated to face south and are fixed in place. They do not move to follow the path of the sun. Panels are opaque in nature and are designed specifically to absorb rather than reflect the sun's rays.

2.7.2 Mounting System

Each frame table will incorporate either between 48 or 60 and 24 or 30 panels and will be supported on aluminium and/or steel posts/frames. Where posts are pushed into the ground this is via typical agricultural methods routinely used to erect fence posts on farms and in the rural area. Depending on ground conditions frames will be fixed to the ground by either:

- Option 1 - Single post ground fixture, which as suggested will be a single aluminium/steel frame driven into the ground (Figure 4);
- Option 2 - Table post ground fixtures - where frames will be fixed on dual posts driven into the ground. An indicative cross section is also included in Figure 4 below; or
- Option 3 - In cases where it is required to safeguard potential archaeological assets frames can be mounted using a shallow concrete 'shoe' which sits at a maximum of 400mm above ground level. An indicative cross section is included in Figure 5 below.

Where concrete shoes are required, these will be pre-cast and brought to site already made. All three options for construction of the mounting system involve a small track machine with a ram/screw attached. This machine tracks up and down in rows installing as it goes.

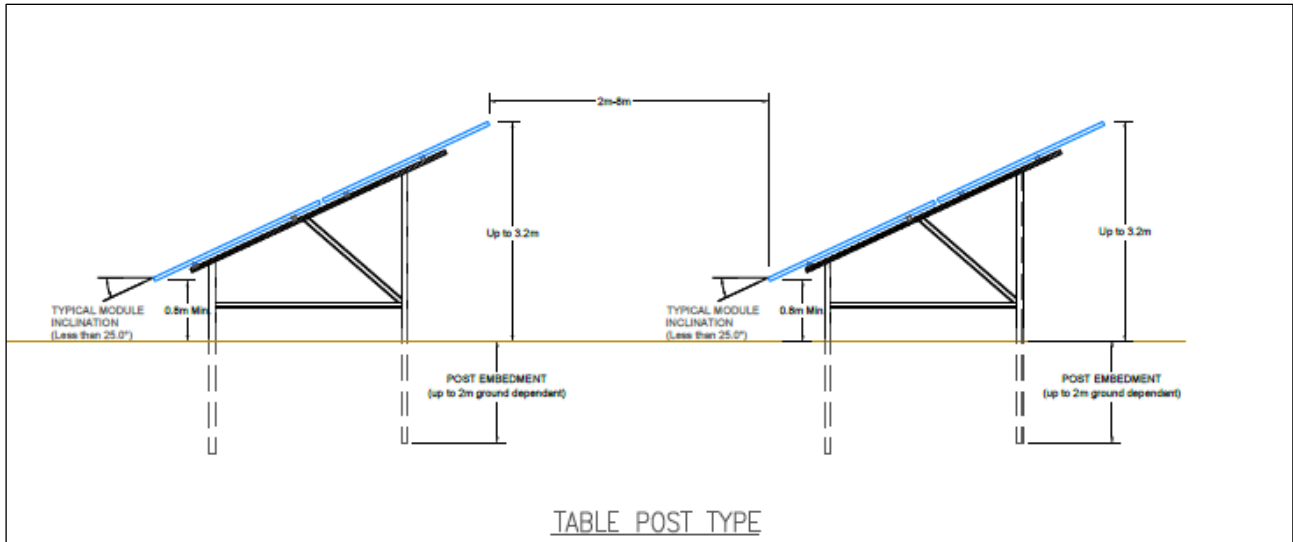


Figure 4: Typical Cross Sections – Table Post Ground Mounting Systems

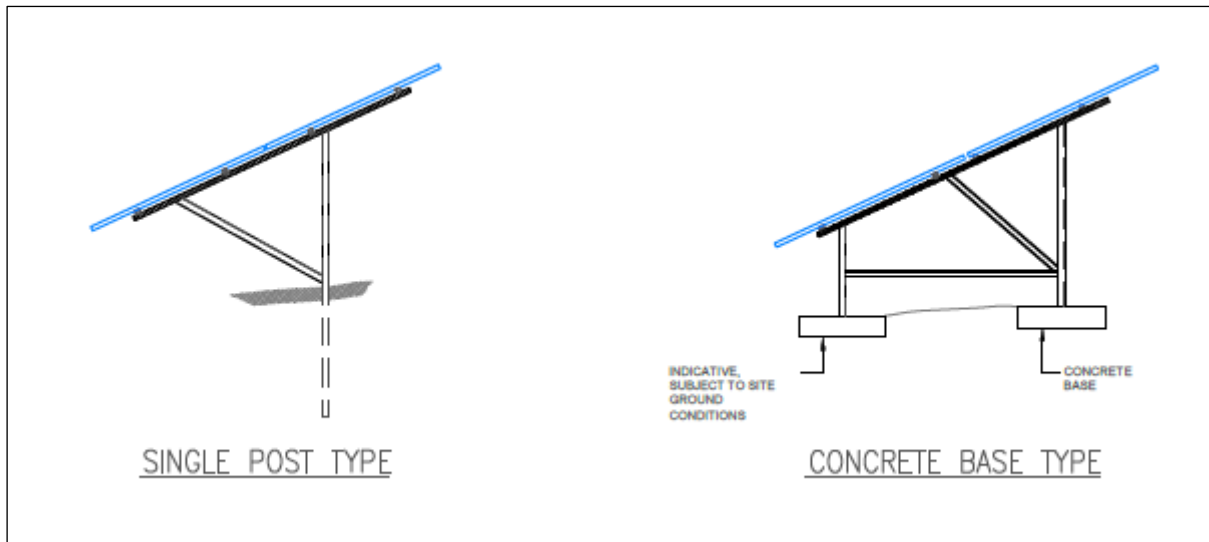


Figure 5: Typical Cross Section – Single Post Ground Mounting System and Shallow Concrete Base Mounting System

2.7.3 Connecting Cables

As part of the solar PV plug and play system, small connecting cables run along the back of each panel to the end of every row where they connect to the main cables which in turn connect to the inverter stations and primary substation. Main cables will be undergrounded.

While the small connecting cables are not under-grounded, the main cables will be installed underground throughout the site as they proceed to the on-site substation. Cables typically will be no more than 100mm diameter and will be installed via traditional open trenching techniques. In this instance, trenches will be approximately 1m deep, depending on the detailed terrain. The first 150mm of trenches will be filled with sand. Sand will generally be delivered to the site and placed adjacent to trenches on an "as required basis."

The remainder of the trenches will be backfilled with the existing topsoil which was previously removed to facilitate the cable laying. There will be no importing of materials to facilitate this process. Vegetation soil turves will be laid beside the trench and used to reinstate the ground to original levels after the cables have been installed. This work is undertaken by a track machine/tractor with a plough on the back. Back-filling will be facilitated by a track machine. Accordingly excavation, cable laying and reinstatement will take place sequentially across the site and on a row by row basis.

The on-site primary substation is located at Houston South. It is proposed to connect Houston North, via a small connecting substation, to this on-site primary substation via an underground cable connection. Although the route of this cable is to be confirmed, two potential options are included within the application drawings:

- Option 1 – Proposed cable crossing the B790 and then proceeding eastwards within the existing verge of the B790 Houston Road for a distance of approximately 360 metres where it is directed southwards across agricultural lands within the Applicant’s control for a distance of approximately 850m. This potential route traverses the River Gryfe which will be either by overhead cable or via directional drilling which will commence at a suitable distance to the north of the watercourse and end at an appropriate distance south of same;
- Option 2 – Proposed cable proceeding eastwards within the existing verge of the B790 Houston Road for a distance of approximately 850 metres until the junction with Moss Road, where it turns south and continues within the existing verge for a distance of approx. 900 m until it reaches the Houston South, eastern site entrance. The option traverses the River Gryfe via Fulwood Bridge which is located along Moss Road.

2.7.4 Battery Storage

The battery storage facility will have a capacity of approximately 25MW and will comprise approximately 12 No. storage units typically measuring 12.2m (l) x 2.5m (w) x 3m (h) set side by side generally 3 metres apart. Each pair of storage units will be facilitated by an associated power conversion system (PCS) unit (6 in total) again typically measuring 12.2m (l) x 2.5m (w) x 3m (h).

The battery storage units and PCS units will sit atop concrete plinths/upstands typically measuring 300mm high but within a range of 100mm to 500mm. Concrete will be limited to the extent of the upstands and will not be placed across the entirety of the Battery Storage Area. The battery storage facility will be set adjacent to the Substation Compound located within the southern portion of the site. The storage units and proposed substation will be placed atop a permeable surface. Other than the extent of concrete referred to, the remainder of the compound within which the BESS facility is located will be finished in permeable stone.

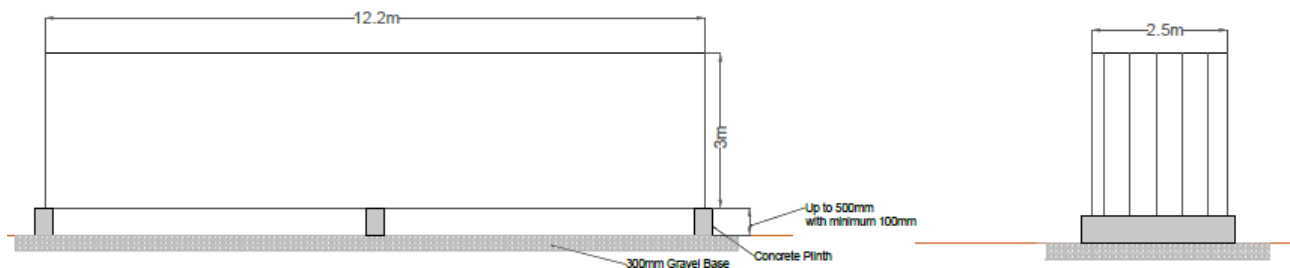


Figure 6: Typical Battery Storage Unit

2.7.5 Primary Substation Building

The substation and control building compound will accommodate all necessary equipment to enable the solar farm electrical system to be controlled, monitored, metered and connected to the network. The compound will accommodate a customer substation and DNO substation.

Equipment to be accommodated within the substation typically includes metering equipment, switchgear, transformers, the central computer system and electrical control panels. SCADA and telecommunications links will also be required at the site for the purposes of metering, remote control and protection communication to the Network Control Centre.

A storeroom will also be provided within the control building. The building will not be permanently staffed but will be periodically visited by maintenance personnel.

Both the customer and DNO substation building dimensions will vary depending on the specification at the time of order and build but are generally less than 40m² each and both will sit atop a concrete pad. It is located within a larger compound measuring approximately 20m (l) x 20m (w) in area. The ground surface of the proposed security compound will be finished in permeable stone.

2.7.6 Inverter Stations

These will be accommodated in small modular cabin like buildings which will be sensitively positioned throughout the site. They are constructed atop raised concrete plinths, with footprint dimensions typically measuring 12.2m (l) x 2.5m (w) rising to a height of 3m. There are 26 containers across the site. The inverter stations are connected to the arrays of panels by cabling which has been buried underground. The panels themselves generate Direct Current (DC) electricity which is converted into Alternating Current (AC) electricity by the inverter stations before being fed into the primary substation and then onward to the local electricity grid network. Inverter stations are set atop concrete plinths which again minimises the extent of concrete utilised across the site.

2.7.7 Grid Connection

It is anticipated that the Solar Farm and Storage Facility will be connected to the network at the existing Johnstone 132/33kV substation by an underground cable either along the public road and/or third party land. This connection does not form part of this application.

2.7.8 Temporary Construction Compound

Two temporary storage compounds are proposed during construction, one within the northern and one within the southern site portions. It is unlikely that the compounds will be active simultaneously and rather it will move within the site as the construction progresses. The compound will be surrounded by a 3m high chain link fence to secure the contents and will enclose:

- A site office;
- Containers to facilitate storage of panels and tools;
- Areas of parking;
- Fuel storage container;
- Kitchen;
- Chemical toilets; and
- An area of storage for sand to facilitate cable laying.

Toilets will be self-contained. There will be no discharge to the ground or requirement for septic tank provision. Chemical toilets will be placed within a bunded area to protect against leakages. Toilets will be disposed of off-site, as required by appropriate contractors and to appropriate licenced facilities.

The proposed fuel storage container will be surrounded by a bund wall to protect against spillages and contamination. Ground level will be finished in a proposed 300mm Type 3 stone or equivalent. The area will measure approximately 75m x 75m on the northern part and a much smaller compound area will be required for the southern area, these will be temporary in nature. Upon completion of construction works compound areas will be reinstated and all hardcore will be removed off site and disposed of appropriately.

2.7.9 Waste Disposal

The proposal will not generate any waste. As described in section 1.3.7 above, toilet facilities on-site will be self-contained to be appropriately disposed of off-site by qualified contractors. Likewise, any hardcore associated with the reinstatement of temporary construction compounds will be removed and disposed of appropriately.

2.7.10 Perimeter Fencing

For security purposes the area of development will be enclosed by 2.45m high post and wire (deer) fencing, see Figure 7 below. The materials used are chosen to be in keeping with the landscape. Where hedgerows exist or where planting is proposed the fencing will be located on the internal side of said planting to obscure visual impacts. The fence will be raised 100mm off the ground to allow continued unrestricted access and foraging across the site by small mammals including fox and badger.



Figure 7: Proposed Perimeter Fencing

2.7.11 CCTV Cameras

For security purposes there will be CCTV cameras placed strategically throughout the reduced development site. These will be pole mounted to heights of 3m, be directed along fence-lines and utilise infra-red technology. Accordingly it is not necessary to floodlight the facility and no permanent lighting is proposed. This is an essential component of the overall development and is required to monitor the site and detect any unauthorised access.

Cameras are designed to not move either intentionally or unintentionally due to adverse weather conditions or animal activity. On commissioning of a CCTV system it is possible to 'mask out' certain areas if that area is sensitive. Monitored CCTV systems are manned 24 hours, 7 days a week.

Adequate safeguards are in place to ensure that privacy interests are not compromised and the rights of individuals whose personal data may be recorded by the cameras are protected.

2.7.12 Access Roads

Access to Houston North for both construction and operation will be via existing field entrances on either side of both N Mains Road and Turningshaw Road. Access to Houston South will be via an existing field entrance on the southern side of Auchans Road, and entrances on either side of Moss Road. The access is appropriate to accommodate the largest vehicle visiting the site during construction (standard HGV).

2.7.13 Internal Service Tracks

The development will utilise existing agricultural lanes for servicing purposes in so far as is reasonably possible. Access will also be achievable during construction and operation via tractor or 4 x 4 vehicles around the periphery of existing fields where buffers to field boundaries are designed into development proposals. As such the extent of proposed new access tracks is minimised. Where new tracks are required these will be permeable and of stone construction.

2.7.14 Construction Period

The proposal will be constructed across a 16 week period. This timeframe is based on a working day of 8am - 6pm from Monday to Friday and from 8am - 1pm on Saturday. This timeline does not allow for holiday periods or any potential work embargos placed on construction via any planning conditions during certain periods, should such embargo be required.

2.7.15 Operational Period

It is anticipated that the proposal will have an operating life of 40 years after which all panels and associated infrastructure will be removed and the site reinstated in accordance with a scheme to be agreed in writing with the Planning Authority at that time. This requirement is likely to be attached as a condition of compliance to any notice of planning consent.

2.7.16 Panel Cleaning/Maintenance

Professional contractors will undertake panel cleaning using water. Cleaning will tend to take place during times of dry weather. As per the specified PV module manufacturer guidelines, no chemicals will be used in the cleaning of the modules ensuring there will be no contaminated run-off from panel washings on.

PV modules are classed as a 'Class 2' electrical component; this means that no touchable part of the panel is capable of causing electrocution, even in the event of internal short circuit.

2.7.17 Traffic Generation

Traffic generation at the site will peak at week 8 of the 16 week programme (Construction peak and delivery peak) when there will be 132 deliveries to the site across the entirety of the week.

2.7.18 Lighting

No permanent lighting is proposed. Manually operated lights may be attached to the substations and transformer and/or inverter cabinets in the event of an emergency maintenance visit being required in the hours of darkness.

2.7.19 Decommissioning & Reinstatement

At the end of the project's operational life the solar farm will be fully decommissioned. This will include the sub-station which will then be obsolete. This will involve the careful dismantling of the component elements including the electrical equipment and surrounding housing which encases the components to leave the concrete base upon which the sub-station sits. Following standard practice, the upper part of the base will be broken up and sub soil and top soil reinstated. Only the lower part of the concrete base would be left in situ in the ground, which would remain benign and inert. The reinstatement of sub soil and top soil together with hydro seeding will re-establish a grass sward to ensure there would be no evidence that a sub-station had been present upon completion of the decommissioning stage. This can be subject to a suitably worded condition and incorporated into a decommissioning strategy.

The operational lifespan of the project is 40 years and over this time any landscaping associated with proposals and over this period will establish and grow to form mature hedgerows and shrubbery. All landscaping will be retained in situ.

Solar panels will be de-commissioned in line with the requirements of the Waste Electrical and Electronic Equipment (WEEE) Regulations.

All project elements will be removed from site and where possible will be recycled. Any waste generated during the decommissioning process will be removed and transported by a certified and licensed contractor. The site will be restored leaving no permanent visible trace. The solar panels will be removed from the site in the same way they were transported to the site originally. The cables interconnecting the panels to the electricity grid system will be de-energised and removed from the site, with any cable marker signs removed.

A decommissioning programme will be agreed with the relevant authorities prior to commencement of the required works. An alternative option at the end of the solar farm operational life cycle may be the refurbishment or replacement of components. This action would be dependent upon many factors all of which would combine to inform viability at such future date. Any such proposal would require a new development consent application.

2.8 Design Principles

A series of design principles have underpinned the design evolution of the project. These include:

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- Undertaking development proposals within the existing site constraints including field boundaries, existing vegetation and site topography;
- Tree retention across the site and accommodation of development proposals within existing landscape features. Internal access tracks will be facilitated via existing gateways where possible;
- There will be no re-grading of land or cut and fill to facilitate panel placement. Excavation is required to allow cable laying only together with the foundations for the inverter stations and on site substation;
- Areas of greatest environmental sensitivity within the wider site are excluded from development and a package of environmental management proposals including landscape proposals and ecological enhancement measures are integral components of the project.

Where there is potential for minor deviations in respect of project components, for example heights of panels off the ground, in all instances the maximum/most onerous design parameter has been applied to ensure a robust "worst case scenario" assessment.

3 LEGISLATIVE CONTEXT

3.1 EIA Screening

The Electricity Works (Environmental Impact Assessment) (Scotland) Regulations 2017 ('the EIA Regulations'), as amended by The Environmental Assessment (EU Exit) (Scotland) (Amendment) Regulations 2019, provide that a Schedule 2 development may constitute EIA development:

"The carrying out of development (other than development which is Schedule 1 development) to provide any of the following—

- 1) *a generating station;*
- 2) *an electric line installed above ground—*
 - a) *with a voltage of 132 kilovolts or more;*
 - b) *in a sensitive area; or*
 - c) *the purpose of which installation is to connect the electric line to a generating station the construction or operation of which requires consent under section 36 of the Electricity Act 1989; or*
- 3) *any change to or extension (including a change in the manner or period of operation) of development of a description listed in schedule 1 or in paragraphs (1) or (2) of this schedule where that development is already authorised, executed, or in the process of being executed, and the change or extension may have significant adverse effects on the environment."*

Where an application is made for a Schedule 2 development in the absence of prior EIA screening, Regulation 10 of the Regulations requires the Scottish Ministers to adopt a screening opinion in respect of the proposed development to which the application for Electricity Act consent relates.

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:

1. **Characteristics of the Development** in respect of the size and design of the development, the cumulation with other development, the use of natural resources, waste production, pollution, risk of major accidents or disasters and the risk to human health.
2. **Location of the Development** in respect of the environmental sensitivity of geographical areas likely to be affected by development.
3. **Characteristics of the Potential Impacts** in respect of the likely significant effects of the development on the environment, taking into account the magnitude and extent of the impacts, the nature of the impact, any transboundary impacts, the intensity and complexity of impacts, the probability, duration, frequency and reversibility of potential impacts, cumulation with the impacts of other development and the possibility of reducing the impact.

Solar farms are by their nature a passive intervention in the countryside with the primary consideration normally relating to visual impact and any potential impacts on nature conservation and cultural heritage interests. Whilst utility scale battery energy storage developments have only recently been put forward, given their straightforward nature, relatively small footprint, low vertical extent and limited noise effects they have not generally triggered EIA. This Application is supported by a suite of tailored environmental reports that assess the potential impacts on the environment and all conclude that no significant effects will arise.

This Planning Application is supported by a number of environmental reports which are discussed in further detail under the specific and relevant policy considerations in section 4 of this Statement. The findings of these individual assessments are material to the consideration of any EIA determination in respect of the Proposed Development. In summary the key points emerging are:

Natural Heritage:

- The application is supported by an Ecological Impact Assessment (EclA). The EclA comprised a desk-based assessment and walkover surveys for terrestrial and aquatic protected species and habitats. The report identifies potential impacts on ecological receptors located within and immediately adjacent to the

Proposed Development and provides recommended mitigation and enhancement measures where appropriate.

- This confirms that there are 2 statutory designated sites, the Black Cart Site of Special Scientific Interest (SSSI) and Special Protection Area (SPA), located within 2km of the Development Site Boundary and an additional three SPAs are located within 20km of the boundary. The assessment confirms that the potential impacts on habitat within the Black Cart SPA/SSSI and Inner Clyde SPA, and whooper swan from the Black Cart SPA/SSSI were assessed. The assessment concluded that the construction, operation and decommissioning phases will result in a negligible effect upon habitat within the Black Cart SPA/SSSI. The assessment upon whooper swan concluded that the construction, operation and decommissioning phases could potentially impact through permanent loss of foraging habitat beneath the development, temporary habitat degradation during pollution events and maintenance activities, and displacement or disturbance due to construction noise and/or lighting. In addition, there is an identified potential risk during the operational phase and potential disturbance of foraging birds through occasional maintenance work. As detailed in the report and summarised in section 4 of this Statement, the Proposed Development includes embedded proposals for effective mitigation to address these potential impacts including planting that will act as a buffer to noise and disturbance for foraging swans.
- No AWI woodlands or LNCS were located within the site boundary, although some do border it. Construction and operation of the Development will be restricted to the site boundary. There are no national or local nature conservation designations affected by the Proposed Development.
- There will be no unacceptable impact on protected species and positive steps are being taken to enhance habitat for such species.
- No unacceptable impacts on valued habitats will arise in that the only loss of habitat relates to existing grassland habitat which is deemed to be a minor and local impact.
- The following measures have been incorporated into the design of the Development, to minimise impacts on ecological receptors:
 - The Development Site Boundary avoids woodland around the field edges to avoid any loss and/or change to these habitats.
 - The existing woodlands within the Development Site Boundary will be maintained and no panels or other built elements (e.g., access tracks, inverter containers) are located within these habitats. Proposed security fencing will separate the boundaries of these woodlands from the main operational site.
 - A 5-10m buffer around all trees and watercourses.
 - A 30m buffer around all trees with potential to support roosting bats.
 - Deer fencing (2.45m high) will surround the site but will be raised 100mm off the ground to permit movement of small mammals (e.g., fox, badger).
 - Where hedgerows exist in the location of the proposed security fencing, the hedgerows will be retained and fencing situated on the internal side of the hedgerow.
 - CCTV cameras within the site will utilise infra-red technology.
 - Existing agricultural tracks within the Development Site Boundary will be utilised where possible, minimising the extent of new access tracks. Any new tracks will be created using permeable stone.
- The Proposed Development also incorporates biodiversity enhancement measures including planting of hedgerow and woodland/scrub screen planting across the site which will create breeding habitat and also enhance foraging corridors for bats which will have a moderate beneficial effect on woodland and scrub habitats. The in-design mitigation and enhancement measures outlined above and in the EclA are predicted to have long-term beneficial effects for badger, bats, and breeding birds.

Flood Risk & Drainage:

- The Application is supported by a Flood Risk Assessment (FRA) which demonstrates that the northern portion of the site is affected by the floodplain of the Barochan Burn. The concept of 'flood avoidance' as described in the Scottish Planning Policy has been applied to the layout of the Proposed Development, which will locate the development away from the functional floodplains and medium to high-risk areas.

- No development is being located in the areas that have been identified from the SEPA flood mapping as 'Medium likelihood of flooding'.
- A 10m buffer will be maintained either side of all watercourses and the panels will be above the ground by at least 800mm. These measures will ensure that the risk of flooding to the panels is minimised. The substation and inverter stations will be located on higher ground. As the floodplains are unaltered, the development will not cause an increase in flood risk elsewhere.
- The SEPA Flood Map shows very small areas of potential surface water flooding within the site. The Proposed Development has been designed to ensure that areas of the site that have natural depressions that could cause a significant depth of potential surface water flooding have been avoided for the siting of panels. In the few instances where panels are proposed across localised areas of surface water they will be kept a minimum of 800mm off ground level which is deemed to provide adequate protection.
- The Proposed Development will not increase the rate of discharge from the current pre-development surface water run-off rates, and no formal drainage systems will be installed. Disturbance during construction will be minimal and grass will be retained. However, where construction activities have impacted on existing areas of vegetation, these areas will be chisel ploughed and re-seeded with agricultural grazing/ silage sward grass species. The site will be actively managed to keep the soil in good condition during the operational phase and maintain the sward where possible. Checks will be undertaken by staff visiting the site for maintenance visits at 6 monthly intervals.
- The FRA has shown that the development is at a low risk of flooding and will not increase flooding elsewhere.

Landscape & Visual Impacts

- The Application is supported by a Landscape & Visual Impact Assessment (LVIA) which identifies and determined the effects on landscape character, landscape features, visual receptors and visual amenity as a result of the Proposed Development.
- The Proposed Development is located entirely within the Alluvial Plain Landscape Character Area (LCA). This LCA is extensive and predominately of an open character, through its low-lying, undulating topography. The Local Development Plan Landscape Character Assessment states that this LCA has a low to medium sensitivity to development. The value of the LCA is judged to be medium.
- Construction phase operations associated with the underground cabling and operations associated with the installation of solar panels and battery storage and related infrastructure will have a localised, short-term impact on the LCA as roadside verges and localised portions of fields are disturbed during the construction phase. Construction traffic may be more apparent on local roads, but this will have a localised, short term impact on the LCA. The battery storage construction area is well screened by woodland and topography.
- During the operational phase, the solar panels, battery storage facility and related above ground infrastructure of the Proposed Development will be perceived as a medium addition locally and will not be apparent or obvious at all within large parts of the wider context of this extensive LCA away from the site boundary. Landscape planting is proposed on the western and north-eastern field boundaries in the Houston North Parcel of the Proposed Development. Meanwhile, landscaping is also proposed at the Houston South parcel of the Proposed Development along Moss Road. This will strengthen the hedgerows and site boundaries and will reflect the character of this part of the LCA. This proposed planting will locally prevent the landscape influence of the Proposed Development extending beyond the site boundary.
- The predicted significance of landscape effect for the Alluvial Plain LCA during the construction phase is localised, minor, adverse, temporary in duration and assessed as not significant as disturbed ground will be reinstated following completion of construction operations associated with underground cabling and installation of solar panels etc.
- The predicted significance of landscape effect for the Alluvial Plain LCA during the operational phase is Moderate and not significant as predicted effects are limited in extent by the low-lying nature of the proposed site, surrounding woodland, hedgerows and trees as well as undulating topographical changes in the surrounding landscape including the M8 and railway line embankments to the east and will be barely perceptible in the wider landscape and the additional vertical elements proposed will be difficult to perceive in the local LCA beyond locations at the immediate boundary.

- The Proposed Development has been assessed as not giving rise to any significant direct or indirect effects on any of the landscape designations; AONB's; National Parks; Special Landscape Areas; or Historic Parks & Gardens as a consequence of distance from these features, intervening topography and vegetation cover. The nearest Core Path to the Proposed Development is Route BBH/1 that runs for approximately 2km on Craighends Road north / track to Chapel Road. The Proposed Development will be directly visible in close proximity for a short section but access for walkers will be maintained through the site. The Proposed Development will be a medium change to the visual context at these local locations and potentially a point of interest for walkers. The viewer sensitivity is high. The magnitude of visual impact is medium. The predicted significance of visual effect is during the operational phase Moderate to major assessed as not significant due to the limited section of the Core Path with direct view; the path will remain open to walkers; and potential that solar farm may act as point of interest along the Core Path for walkers.
- A total of 13 viewpoints have been assessed, for both construction and operational phases of the Proposed Development. Two viewpoints, Viewpoints 7 and 9, have been predicted to experience Moderate to major and not significant effects prior to the implementation of proposed landscape planting that is an integral part of the Proposed Development. It is considered that the proposed mitigation planting will reduce the predicted effects, such that views are predicted to experience Moderate, assessed as not significant effects as visible elements of the Proposed Development will become well screened in views in this flat landscape.
- An assessment of effects on residential properties has taken place and no properties in close proximity to the Proposed Development are predicted to experience any significant visual effects during either the construction or operational phases associated with the Proposed Development. Two semi-detached cottages on North Mains are predicted to have Moderate to major and not significant effects during the operational phase of the Proposed Development, prior to the implementation of proposed landscape planting that is an integral part of the Proposed Development. With mitigation integrated to the Proposed Development Moderate and not significant effects are predicted during the operational phase of the Proposed Development for these properties on North Mains. The residential properties at North Mains are under the ownership of the landholder with a financial interest in the Proposed Development. A two storey farmhouse on Turningshaw Road will also have potential views through dense garden trees. Moderate to major and not significant effects are predicted during the construction phase of the Proposed Development from this property as works will be temporary and very short in duration. Moderate to major to substantial and significant effects are predicted during the operational phase of the Proposed Development, prior to establishment of proposed mitigation as the property has significant tree cover at its boundaries. With mitigation integrated to the Proposed Development Moderate and not significant effects are predicted during the operational phase of the Proposed Development. All other properties have been predicted to have not significant effects that will decrease further with planting in place.
- It is considered that the magnitude of cumulative landscape impact associated with the Proposed Development and a recently permitted Solar Farm to the east will be indirect and negligible due to the character of surrounding landscape and screening by woodland blocks and coniferous plantations as well as embankments at the M8 and railway line to the east of the Proposed Development.
- Overall, the surrounding landscape and its visual resources has the ability to accommodate the changes associated with this type of development.

Impacts on Resources

- The Application is supported by an Agricultural Land Capability Assessment which confirms that the main agricultural land classes identified within the site are Class 3.2 or lower, with a very small area of Class 3.1 Prime Agricultural Land located to the west of Turningshaw Road.
- For the very small area of Prime Land, the mitigation for the use of this land for this development is that the land will continue to fulfil an agricultural purpose during the operation of the facility and soils would remain in situ on the site, as far as possible. The rows of panels will be separated by spaces of between 2-6 metres and will be fixed atop frame tables which will be pushed or screwed into the ground. At their lowest, panels will remain typically 800mm off existing ground levels which will allow uninterrupted grazing by sheep. There would therefore be no permanent loss of the soil resource as a result of the development and the land would be restored to the pre-working agricultural use following the completion of the operation of the facility.

- The Proposed Development does not negatively impact on the water environment, important mineral deposits, prime agricultural land, peat and other carbon rich soils, open space, or important trees and woodland. Indeed, the Proposed Development includes embedded proposals for additional woodland and hedgerow planting that will enhance biodiversity and increase trees and woodland in the locality.

Built Heritage

- The Planning Application is accompanied by a Heritage Assessment. This archaeological assessment draws together the available archaeological, historic, topographic and land-use information in order to clarify the heritage significance and archaeological potential of Application Site and its relevant site context.
- The assessment confirms that there are no designated heritage assets in the site.
- It is considered that there is low potential for hitherto unrecorded archaeology to be present across most of the site owing to its having been historically poorly draining and unattractive for agriculture. An area of higher ground has been identified as having moderate potential for Early Medieval and earlier archaeology. Any unrecorded archaeology present is unlikely to be of greater than regional importance.
- In the event that archaeology is present, it is likely to be subject to localised disturbance during construction. The likelihood of this occurring is considered very low given the archaeological potential of the site and nature of ground disturbance associated with construction.

Traffic & Transport

- The Transport Statement submitted in support of the Planning Application confirms that the Proposed Development will not result in any unacceptable impacts on road safety or the operation of the road network. Access to Houston North for both construction and operation will be via existing field entrances on either side of both N Mains Road and Turningshaw Road. Access to Houston South will be via an existing field entrance on the southern side of Auchans Road, and entrances on either side of Moss Road.
- The level of traffic associated with the Proposed Development will not result in any significant increase over the existing patterns. The overall the percentage increase in delivery movements are forecast to be low, with overall increases in traffic forecast to be +2.62% for the A726 Barnsford Road, which is the main route that vehicles are likely to use prior to accessing Houston Road.
- While such increases are temporary in nature, the changes in traffic described are also entirely within the range of normal fluctuations in daily traffic that could be expected on the A726. Therefore, against the underlying capacity of these roads, the level of change does not constitute a significant change.

Glint & Glare

- A Glint & Glare Assessment has been completed in support of the Proposed Development. That assessment has concluded that mitigation is recommended for a 200m section of the B790 Houston Road due to solar reflections occurring within a road user's primary field of view (50 degrees either side of the direction of travel) and a lack of sufficient mitigating factors.
- The assessment has also identified two dwellings where mitigation is recommended due to the duration of effects and lack of mitigating factors.
- Mitigation planting is recommended in both instances. The assessment concludes that following the implementation of this planting, there will be no impact from glint and glare.

The anticipated effects arising from the Proposed Development, as detailed in this Statement, are not sufficient to trigger the requirement for an EIA and hence the planning application is not accompanied by an Environmental Statement (ES) and we respectfully request confirmation from the Scottish Ministers that the Proposed Development does not require an EIA under the terms of the EIA Regulations.

4 PLANNING POLICY & ENVIRONMENTAL CONTEXT

4.1 Planning & Environmental Considerations

Section 37 of the Town and Country Planning (Scotland) Act 1997 requires planning applications to be determined in accordance with the development plan unless material considerations indicate otherwise. Proposals that accord with development plans should be considered acceptable in principle and consideration should focus on the detailed matters arising.

The applicant team have undertaken pre-application discussions with the ECU and the local authority, Renfrewshire Council. The matters material to the determination of a planning application for this development will be considered in this section, against relevant policy and the Local Development Plan.

Principle of Development

In terms of national planning policy, revised draft National Planning Framework 4 (NPF4), National Planning Framework 3 (NPF3) and Scottish Planning Policy (SPP) are supportive of wind and solar energy development for Scotland to transition into a low carbon economy. A presumption in favour of development that contributes to sustainable development is set out within SPP.

The Strategic Development Plan (SDP) also supports the vision of the SPP to reduce carbon emissions through renewable energy sources.

The relevant considerations in respect of these strategic policy considerations is set out below.

4.2 National Planning Framework 4

The Scottish Government adopted the National Planning Framework 4 ('NPF4') on 13th February 2023. It sets out a new plan for Scotland to 2045, and acknowledges that Scotland must embrace and deliver radical change to tackle and adapt to climate change, restore biodiversity loss, improve health and wellbeing, build a wellbeing economy and create great places.

NPF4 identifies eighteen national developments and sets out a range of policies for the development and use of land.

Part 1 – National Spatial Strategy sets out six overarching spatial principles which will play a key role in delivering on the UN Sustainable Development Goals and the Scottish Government's national outcomes. One of these spatial principles is a 'just transition', stating:

"We will empower people to shape their places and ensure the transition to net zero is fair and inclusive."

Policy 11 – Energy within revised draft NPF4 aims to encourage, promote and facilitate all forms of renewable energy development onshore and offshore, including solar arrays and battery storage, in appropriate locations. The policy outcomes are the expansion of renewable, low-carbon and zero emissions technologies.

Policy 3 – Biodiversity of the document aims to protect biodiversity, reverse biodiversity loss and deliver positive effects from development. The policy states that development proposals will contribute to the enhancement of biodiversity, and proposals should integrate nature-based solutions, where possible. Development proposals for national or major development, or for development that requires an Environmental Impact Assessment will only be supported where it can be demonstrated that the proposal will conserve, restore and enhance biodiversity, so they are in a demonstrably better state than without intervention.

This application is supported by an Ecological Impact Assessment, which details that the Proposed Development will conserve biodiversity across the site, and which recommends a number of enhancement measures to be implemented following construction so that the development area is in a better state than without intervention.

The Proposed Development is supported in principle by the aims, objectives and policies in NPF4.

4.3 Scottish Planning Policy

The Scottish Planning Policy (December 2020) (“SPP”) is a non-statutory document which outlines the Scottish Government’s priorities for land use planning and therefore should be afforded significant weight in the determination of planning applications.

It is clear from SPP that the Scottish Government is committed to further development of energy projects in appropriate locations.

In respect of delivering a *Low Carbon Place*, the SPP outlines Policy Principles that support this development, confirming that the planning system should:

- support the transformational change to a low carbon economy, consistent with national objectives and targets, including deriving:
 - 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;
- support the development of a diverse range of electricity generation from renewable energy technologies including the expansion of renewable energy generation capacity and the development of heat networks;
- guide development to appropriate locations and advise on the issues that will be taken into account when specific proposals are being assessed;
- help to reduce emissions and energy use in new buildings and from new infrastructure by enabling development at appropriate locations that contributes to: Energy efficiency; Heat recovery; Efficient energy supply and storage; Electricity and heat from renewable sources; and – Electricity and heat from non-renewable sources where greenhouse gas emissions can be significantly reduced.

Paragraph 80 of the SPP outlines development on prime agricultural land, or land of lesser quality that is locally important should not be permitted except where it is essential for certain developments, including for the generation of energy from a renewable source where this accords with other policy objectives and there is secure provision for restoration to return the land to its former status.

The Proposed Development is therefore supported in principle by the SPP.

4.4 Renfrewshire Local Development Plan 2 (2021)

Renfrewshire Council adopted the Renfrewshire Local Development Plan 2 (RLDP2) on 7th December 2021. It confirms that:

“All development proposals must be assessed against the Spatial Strategy, Policies, the Proposals Maps, the Placemaking Plans and the New Development Supplementary Guidance, to ensure compliance with the overall Spatial Strategy for Renfrewshire.”

The RLDP2 adopts the vision and aims of the SDP and offers support in principle for renewable energy development in the right locations with the appropriate scale and design. The Planning Application is supported by a number of reports that provide detailed assessments of the key environmental and visual impacts predicted to result from the Proposed Development. Commentary on the findings of these assessments is provided below in respect of each of the relevant policy considerations.

4.4.1 Policy I4 Renewable and Low Carbon Energy Developments

Policy I4 Renewable and Low Carbon Energy Developments supports proposals which deliver increased energy efficiency and the recovery of energy that would otherwise be lost. Development proposals will be considered in relation to the scale of the contribution towards renewable energy generation targets and will be supported in principle where they are considered 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.

Contribution to Renewable Energy Generation Targets

The Policy states that assessment of proposals for renewable energy developments will be based on the principles set out in the current Scottish Planning Policy and assessments will include the scale of the contribution towards renewable energy generation targets.

There is a clear requirement to balance the peaks and troughs associated with electricity supply and demand to manage the strain on distribution networks and ensure there are no power blackouts. This is particularly important as older generating plants are decommissioned. In Scotland particularly, there is strong support for renewable energy generation which is inherently intermittent. The Proposed Development is required to smooth over the troughs in electricity supply, being able to respond at short notice to requests from National Grid to generate, such as periods when renewable sources are not generating or fossil fuel plants are unexpectedly offline.

The Proposed Development combines solar generation in excess of 50MWp with a battery storage facility that will have a capacity c.25MW. The Proposed Development will make a significant contribution to the delivery of renewable energy targets.

Appropriate Location, Siting & Design

This Planning Application is supported by a number of reports addressing specific environmental considerations. The conclusions of those reports are considered in more detail under the specific, relevant policy considerations below. In summary those assessments have concluded that the Proposed Development will not give rise to unacceptable impacts in respect of landscape & visual considerations, natural & built heritage, flooding & drainage or on important resources including prime agricultural land.

Further the Transport Assessment submitted in support of the Planning Application confirms that the Proposed Development will not result in any unacceptable impacts on road safety or the operation of the road network. Access for both construction and operation will be via the A726 Barnsford Road and onto the B790 Houston Road which is located in-between the northern and southern development parcels.

The level of traffic associated with the Proposed Development will not result in any significant increase over the existing patterns. The overall the percentage increase in delivery movements are forecast to be low, with overall increases in traffic forecast to be +2.62% for the A726 Barnsford Road, which is the main route that vehicles are likely to use prior to accessing Houston Road.

While such increases are temporary in nature, the changes in traffic described are also entirely within the range of normal fluctuations in daily traffic that could be expected on the A726. Therefore, against the underlying capacity of these roads, the level of change does not constitute a significant change.

Security fencing is provided, designed to be unobtrusive and to permit access by protected species.

An assessment of the possible effects of glint and glare from the Proposed Development has been undertaken to assess the possible impact upon surrounding road users and dwellings. That assessment has concluded that mitigation is recommended for a 200m section of the B790 Houston Road due to solar reflections occurring within a road user's primary field of view (50 degrees either side of the direction of travel) and a lack of sufficient mitigating factors.

The assessment has also identified two dwellings where mitigation is recommended due to the duration of effects and lack of mitigating factors.

Mitigation planting is recommended in both instances. The assessment concludes that following the implementation of this planting, there will be no impact from glint and glare.

The Proposed Development has been designed to ensure that it will not have any individual or cumulative significant effects upon the safe and efficient use of Glasgow Airport and associated operations, and Ministry

of Defence surveillance systems. The Proposed Development will not have any significant effects upon outdoor sport interests.

As described in more detail in the subsequent sections of this Statement, the Proposed Development will not result in unacceptable environmental or amenity impacts. As summarised below, the Proposed Development:

- Will make a significant contribution to the achievement of Scotland's renewable energy targets;
- Will not result in unacceptable impacts on nature conservation interests;
- Embeds proposals to deliver enhanced biodiversity in the proposed design;
- Will not result in unacceptable impacts on landscape character, the qualifying features of any Special Landscape Area or on historic features;
- Does not involve significant development on prime agricultural land;
- Does not result in unacceptable impacts on the water environment, mineral resources, peat and other carbon rich soils, open space, or important trees and woodland;
- Will not give rise to unacceptable impacts on residential amenity; and
- Will not result in any unacceptable impact on the safety and convenience of road users.

In that context the Proposed Development is supported by Policy I4 in that it will make a significant contribution to the achievement of renewable energy targets, is located on an appropriate site and has been designed to prevent any individual or cumulative significant effects on interests of acknowledged importance.

Environmental Considerations

4.4.2 Policy I3 Flooding and Drainage

Policy I3 states that the precautionary approach will be adopted to the reduction of flood risk from all sources in line with the risk framework set out in Scottish Planning Policy. New development is required to avoid areas susceptible to flooding and 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. New development will integrate surface water management into the design of green infrastructure including permeable surfaces.

This Planning Application is supported by a Flood Risk Assessment (FRA) which demonstrates that part of Houston North is affected by the floodplain of Barochen Burn, and the overall site is affected by a number of minor watercourses which do not give rise to flood issues.

A 10m buffer will be maintained either side of all watercourses and the panels will be above the ground by at least 800mm. These measures will ensure that the risk of flooding to the panels is minimised. The substation, inverter stations and battery energy storage units will be located on higher ground. As the floodplains are unaltered, the development will not cause an increase in flood risk elsewhere.

The SEPA Flood Map shows small areas of potential surface water flooding within the site. The Proposed Development has been designed to ensure that areas of the site that have natural depressions that could cause a significant depth of potential surface water flooding have been avoided for the siting of panels. In the few instances where panels are proposed across localised areas at risk of surface water flooding, they will be kept a minimum of 800mm off ground level which is deemed to provide adequate protection.

The FRA demonstrates that the Proposed Development will not increase the rate of discharge from the current pre-development surface water run-off rates, and no formal drainage systems will be installed. Disturbance during construction will be minimal and grass will be retained. However, where construction activities have impacted on existing areas of vegetation, these areas will be chisel ploughed and re-seeded with agricultural grazing / silage sward grass species. The site will be actively managed to keep the soil in good condition during the operational phase and maintain the sward where possible. Checks will be undertaken by staff visiting the site for maintenance visits at 6 monthly intervals.

The FRA has shown that the development is at a low risk of flooding and will not increase flooding elsewhere.

The Proposed Development complies with Policy I4.

4.4.3 Policy ENV1 Green Belt

Policy ENV1 Green Belt supports development within the green belt, in principle, where the proposal is for essential infrastructure such as renewable energy developments. The policy also states that support will be given to developments that are able to demonstrate diversification within the green belt and rural areas which promote new employment, tourism opportunities or community benefits, which are compatible with and do not have an adverse effect on the character of the green belt.

The Proposed Development will result in economic benefits including the creation of significant direct and indirect employment during construction, employment during operation through the project's wider economic stimulus. As described in more detail in other sections of this Statement, the proposal will not have an adverse effect on the character of the green belt and is compatible with the green belt, owing to its dual renewable/farming use. The overwhelming land area will remain agricultural, and sheep grazing will take place across the entire area and will not be impeded by the proposed infrastructure. At the end of the project's operational life, the solar farm will be fully decommissioned.

The New Development Supplementary Guidance document provides further information on the development criteria which development within the green belt must be assessed against. As described in more detail in other sections of this Statement, the Proposed Development accords with the green belt development criteria. As summarised below, the Proposed Development:

- Is supported by an Agricultural Land Capability Assessment which confirms that the main agricultural land classes identified within the site are Class 3.2 or lower, with a very small area of Class 3.1 Prime Agricultural Land located to the west of Turningshaw Road. The Proposed Development is in line with Scottish Planning Policy which supports development on prime agricultural land which is required for renewable energy generation. For the very small area of Prime Land, the mitigation for the use of this land for this development is that the land will continue to fulfil an agricultural purpose during the operation of the facility and soils would remain in situ on the site, as far as possible;
- Will not result in unacceptable impacts on wild land;
- Will not result in any unacceptable impacts on road safety or the operation of the road network, and the site will be accessed from existing field accesses;
- Does not result in unacceptable impacts on watercourses from any pollution risk;
- Will not result in unacceptable impacts on landscape character, the qualifying features of any Special Landscape Area or on historic features;
- Does respect and incorporate important landscape features including traditional field enclosures, watercourses, woodlands and skylines;
- Incorporates appropriate landscaping proposals;
- Will not result in unacceptable impacts on nature conservation interests; and
- Will not give rise to unacceptable impacts on residential amenity.

The Proposed Development complies with Policy ENV1.

4.4.4 Policy ENV2 Natural Heritage

Policy ENV2 aims to protect natural heritage assets and does not support new development where it would 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. 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:

- European and Ramsar Sites: Development must not have an adverse effect on the Inner Clyde Special Protection Area (SPA) with over-wintering Redshank population; Renfrewshire Heights SPA with a breeding population of Hen Harrier or the Black Cart SPA with over-wintering Whooper Swans all internationally important birds. The Proposed Development is supported by an Ecological Impact Assessment (EclA) which confirms that there are 4 Special Protection Areas (SPAs) located within 20km of the Development Site Boundary. The assessment confirms that only the potential impacts on habitat within the Black Cart SPA and Inner Clyde SPA, and whooper swan from the Black Cart SPA were

assessed as all other SPA species were scoped out of the assessment. The assessment concludes that the construction, operation and decommissioning phases will result in a negligible effect upon habitat within the Black Cart SPA. The assessment upon whooper swan concluded that the construction, operation and de-commissioning phases could potentially impact through permanent loss of foraging habitat beneath the development, temporary habitat degradation during pollution events and maintenance activities, and displacement or disturbance due to construction noise and/or lighting. Effective mitigation to address these potential impacts is built into the project design:

- Pre-construction surveys will be undertaken at least five months in advance of construction to identify any changes in the baseline conditions and confirm the activity status of any protected features likely to be affected. The results of these surveys will be incorporated into species protection plans for the Development and inform the need for any licences.
- If construction works are undertaken during the breeding bird season (season defined as March to August inclusive), nesting bird checks will be undertaken in advance of any vegetation clearance or other works that could disturb nesting birds.
- Hedge planting and gapping up around the site will be carried out and maintained in the long term, in line with good practice guidance. This will buffer noise and visual disturbance, minimising operational disturbance to whooper swan foraging in adjacent fields and the potential for collision risk for whooper swan with the solar panels.
- **National Designations:** Development will be required to safeguard the nature conservation value of Sites of Special Scientific Interest (SSSI). Development will only be permitted where it will not significantly affect the integrity of the site or qualities for which it has been designated or that any adverse effects are clearly outweighed by social, economic or environmental benefits of national importance. The EclA confirms that there is 1 statutory designated site, the Black Cart Site of Special Scientific Interest (SSSI) located within 20km of the Development Site Boundary. The assessment confirms that the potential impacts on habitat within the Black Cart SSSI, and whooper swan from the Black Cart SSSI were assessed. The assessment concluded that the construction, operation and decommissioning phases will result in a negligible effect upon habitat within the Black Cart SSSI. The assessment upon whooper swan concluded that the construction, operation and de-commissioning phases could potentially impact through permanent loss of foraging habitat beneath the development, temporary habitat degradation during pollution events and maintenance activities, and displacement or disturbance due to construction noise and/or lighting. Effective mitigation has been outlined in the previous bullet point.
- **Wild Land:** The Proposed Development will not have a significant effect on the qualities of wild land.
- **Local Designations:** Development will require to protect and where possible enhance Sites of Importance for Nature Conservation (SINCs) and Local Nature Reserves (LNRs) to ensure that their nature conservation interest is maintained. There are no identified SINCs or LNRs within 20kms of the Proposed Development site.
- **Protected Species:** The Proposed Development includes embedded mitigation to address potential impacts, including:
 - A 30m buffer around all protected species potential resting sites (i.e. potential bat roosts, badger setts, and otter couches);
 - A 10m buffer from all watercourses/drains/waterbodies;
 - The security fence will be raised 150mm off the ground to allow continued unrestricted badger/otter access across the site;
 - No lighting is proposed at the site and all CCTV installed will use infra-red technology which will prevent light disturbance issues in relation to IEF's;
 - All existing hedgerows and tree lines to be retained and buffered by at least 5m;
 - Open excavations will be covered at the end of each working day. A method of escape (e.g., plank) will be placed in all excavations or trenches so animals can vacate the area overnight. Should any animals be trapped in an excavation, the ECoW shall be immediately notified;
 - Open pipes will be capped at the end of each day to prevent animals from accessing them and potentially becoming trapped;

- All machinery and plant will be checked each morning for the presence of animals in the unlikely event that an individual is using them for resting;
- No works will be undertaken during hours of darkness unless necessary. Should working during darkness be required, the use of artificial lighting will be minimised where possible and directional lighting and/or screening will be used to avoid illuminating watercourses or other sensitive areas (e.g., otter holts or badger setts).
- Landscape Character and Setting: The Proposed Development will not result in unacceptable impacts on landscape character, the qualifying features of any Special Landscape Area or on historic features.
- Clyde Muirshiel Regional Park: The Proposed Development will not have any adverse effects upon the National Park.
- Trees: All existing trees will be retained and buffered from construction and the layout by 5-10m.

The Proposed Development complies with Policy ENV2 Natural Heritage.

4.4.5 Policy ENV3 Built & Cultural Heritage

Policy ENV3 states that development proposals, within or in the vicinity of scheduled ancient monuments will be required to demonstrate that there is no adverse impact on the site or its setting. The policy outlines that there is a presumption against demolition or other works that adversely affect the special interest of a listed building or its setting, and the layout, design, materials, scale, and siting of any development which will affect a listed building, or its setting, should be sensitive to the building's character, appearance and setting.

The New Development Supplementary Guidance document provides further guidance on built and cultural heritage, outlining that development which would adversely affect the site or setting of a Scheduled Ancient Monument will not be permitted. Protection and enhancement of unscheduled sites of archaeological significance and their setting is important.

The Planning Application is accompanied by an Archaeological Assessment Report. This archaeological assessment draws together the available archaeological, historic, topographic and land-use information in order to clarify the heritage significance and archaeological potential of Application Site and its relevant site context.

The assessment confirms that there are no designated heritage assets in the site or immediately adjacent. There are 4 Scheduled Monuments and 24 Listed Buildings within 2km of the site. In particular, Barrochan Hill Roman fort is located approximately 1.3km to the north of the site, and Houston North will be visible from the fort. Fulwood Bridge, a Category B Listed Structure is located approximately 200m to the north of Houston South and 880m to the south-east of Houston North. Houston South will be visible from the bridge.

The assessment concludes that there is no potential for the Proposed Development to adversely affect any designated heritage assets.

It is considered that there is low potential for hitherto unrecorded archaeology to be present across most of the site owing to its having been historically poorly draining and unattractive for agriculture. Any unrecorded archaeology present is unlikely to be of greater than regional importance. In the event that archaeology is present, it is likely to be subject to localised disturbance during construction. The likelihood of this occurring is considered very low given the archaeological potential of the site and nature of ground disturbance associated with construction. It is proposed that an archaeological programme of works targeting the area of moderate archaeological potential is implemented to address this potential by allowing for the appropriate excavation and recording of archaeological assets should they be present. The first phase of this programme of works will be trial trenching of the area of moderate potential to establish the presence/absence of such remains and, should they be present determine their character and extent. This work may be secured by an appropriately worded condition attached to planning consent, should it be granted.

The Proposed Development complies with Policy ENV3.

4.4.6 Policy ENV4 The Water Environment

Policy ENV4 supports 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. The Renfrewshire New Development Supplementary Guidance sets out criteria which is required to be considered for new developments:

- The Proposed Development will incorporate a 10m buffer, which will be maintained either side of all watercourses, drains and waterbodies within the site. The panels will also be above the ground by at least 800mm. This will ensure that the development will not significantly compromise the water environment in terms of its ecological status;
- The Proposed Development will not increase the rate of discharge from the current pre-development surface water run-off rates will not significantly impact upon water quality in adjacent watercourses or areas downstream; and
- The site levels and the floodplains will remain unaltered as part of the proposals; therefore the development will not cause an increase in flood risk elsewhere.

The Proposed Development complies with ENV4.

4.4.7 Policy ENV6 Natural Resources (Minerals & Soil)

Policy ENV6 requires that new development should avoid the unnecessary disturbance of areas of peatland or carbon-rich soils with a presumption against development which would involve significant drainage of disturbance of these areas.

The Proposed Development site is not located within any areas of peatland or carbon-rich soils.

4.4.8 Overall Assessment

For the reasons outlined under each of the key considerations above the Proposed Development complies with the policy provisions of Renfrewshire Local Development Plan 2 2021.

5 OTHER MATERIAL CONSIDERATIONS

The requirement to address climate change and its effects are recognised within a number of key legislative and policy documents which inter-alia establish principles, set objectives and targets to achieve net-zero emissions by 2045. These documents which help shape planning policy at all levels are key material considerations in the assessment of the Proposed Development

5.1 Climate Change (Emissions Reduction Targets) (Scotland) Act 2019

The Climate Change (Emissions Reduction Targets) (Scotland) Act 2019, which amends the Climate Change (Scotland) Act 2009¹, sets targets to reduce Scotland's emissions of all greenhouse gases to net-zero by 2045 at the latest, with interim targets for reductions of at least 56% by 2020, 75% by 2030, 90% by 2040 and 100% by 2045.

The target of net-zero emissions by 2045, five years ahead of the UK, is firmly based on what the independent Committee on Climate Change (CCC) advises is the limit of what can currently be achieved. The levels of all of Scotland's targets are regularly reviewed following advice from the CCC.

The primary objective of the Climate Change Act is to raise the ambition of the greenhouse gas emissions reduction targets that are set out in the Climate Change (Scotland) Act 2009 ("the 2009 Act") which had already established Scotland as a world leader in tackling climate change. The Climate Change Act reaffirms the Scottish Government's commitment to remain at the forefront of global ambition. This is achieved by increasing the ambition of the emissions reduction targets in line with an appropriate contribution to limiting global temperature rises to 1.5 degrees Celsius above pre-industrial levels.

The target levels set are arguably the most ambitious legislative targets in the world. The target levels proposed are those that the Climate Change Committee ("CCC") set out as a high ambition scenario. The Scottish Government accepted the CCC high ambition scenario as Scotland's targets should be very challenging and should reflect a fair contribution to maintaining global temperatures to well below 2 degrees above preindustrial levels as set out in the Paris Agreement.

Projects such as the Proposed Development proposed here will greatly assist in the more efficient management of the renewable energy resource and thereby in the delivery of these ambitious targets.

5.2 Scottish Energy Strategy: The Future of Energy in Scotland

The Scottish Energy Strategy: the Future of Energy in Scotland ("the Energy Strategy") was published in December 2017 and establishes the importance of the energy sector in Scotland and the delivery of goals and policies with the Strategy.

The Energy Strategy addresses that Scotland should not only have the capacity and connections to maintain secure and reliable energy supplies but also have the flexibility and resilience as an additional priority and that developments that provide an innovative local energy system will be supported by the Scottish Government.

The Energy Strategy emphasises that a diverse and well-balanced energy supply portfolio or 'energy mix' will remain essential as Scotland continues to decarbonise heat, transport and electricity systems.

The UK's exit from the European Union ("Brexit") could have a significant bearing on future energy systems. The impacts of Brexit are largely amplified in Scotland due to the important role that energy plays in the Scottish economy. Being part of the internal European energy market is vitally important, as it safeguards Scotland's energy security. Legally-binding European Union renewable energy and energy efficiency targets have played a defining role in stimulating the huge growth in renewable energy in Scotland. The ability to continue trading energy openly and fully across Europe can, if unaffected, play a big part in the progress we make towards Scotland's renewable and climate change targets, and the growth of Scotland's low carbon energy sector.

The Proposed Development is supported by the national Energy Strategy.

¹ [Climate Change \(Scotland\) Act 2009 \(legislation.gov.uk\)](https://www.legislation.gov.uk)

5.3 Scottish draft Energy Strategy & Just Transition Plan

The Scottish Government published the draft Energy Strategy and Just Transition Plan for public consultation on 10th January 2023. It sets a vision for Scotland's energy system to 2045 and a route map of ambitions and actions that, coupled with detailed sectoral plans and the forthcoming Climate Change Plan, will guide decision-making and policy support over the course of the next decade.

The draft Strategy builds on the existing success of renewables across Scotland with three overarching objectives: to significantly scale up renewable energy production; to secure continued and increased investment in the net zero energy economy; and to deliver a fairer, more secure energy system that is no longer reliant on volatile international commodity markets and delivers lower costs for consumers.

The document includes a draft vision for solar energy in Scotland, which emphasises that solar has an important role to play, as part of a diverse energy mix, in Scotland's decarbonisation journey. The ambition is for solar deployment to go further, faster, and the vision includes several actions to enable greater deployment of solar in Scotland. The consultation closed on 9th May 2023.

5.4 Scotland's Electricity & Gas Networks: Vision to 2030

In 2017, Scotland's gas and electricity networks delivered around half of all the energy used in Scotland; in that year £2.25 billion worth of Scottish electricity generation entered the networks, more than 50% of which came from renewables. This Scottish Government strategy stresses that these networks help deliver affordable, reliable and increasingly low carbon energy across Scotland and they will be critical to delivering the principles of the Energy Strategy, and achieving its outcomes.

Their critical importance will remain as the Government look at opportunities to accelerate progress to decarbonise both the national heat and transport systems:

“Whatever their ultimate shape, it is certain that we are going to see huge changes to the ways in which networks are planned and operated. These changes have to be delivered quickly and carefully. We believe that they must be designed to meet the interests of both consumers and businesses, be consistent with our desire to reduce fuel poverty, and reflect the needs of vulnerable customers across mainland Scotland and our islands.

We must work to ensure that our networks continue to support a resilient energy system, throughout and beyond the low carbon transition. There needs to be a greater strategic focus on regional security of supply which considers not only the networks themselves but also the location and characteristics of the resources connected to them.”

On electricity transmission the objective is to deliver a secure and resilient transmission network for Scotland, engineered to reflect the changing dynamics of the electricity system.

In respect of electricity distribution it is recognised that demand management, new platforms and technologies, including batteries, to help manage peaks in local demand and generation in ways that deliver greater value to local communities and support resilient supplies will be critical.

5.5 A Stronger and More Resilient Scotland: The Scottish Government's Programme for Scotland 2022 to 2023

The Scottish Government's Programme for Scotland 2022 to 2023 is understandably focused on dealing with the cost of living crisis, however, it still confirms that the Scottish Government is committed to achieving net zero by 2045.

The programme states, *“On energy, a key component of the current cost crisis, our forthcoming Energy Strategy will set out ambitious plans to generate more power from our own renewable resources”* and *“The increase in renewable energy development and the transition to a net zero economy is just one significant economic opportunity we will work to capture for Scotland's benefit in the year ahead.*

5.6 Update to Climate Change Plan: 2018-2032 (December 2020)

Published in February 2018, the Climate Change Plan sets out a new transport emissions reduction target of 37% for the reduction in emissions from transport to be achieved by 2032.

The Scottish Government is updating the Climate Change Plan and recently published the Climate Change Plan Update (CCPu) to reflect the increased ambition of the new targets set in the Climate Change (Emissions Reduction Targets) (Scotland) Act 2019 and Scotland's approach to the Paris Agreement. Generally the plan sets out a requirement for an emissions reduction plan that maximises opportunities for Scotland whilst protecting the domestic economy.

The Proposed Development will contribute to reducing emissions from energy sources in Scotland, whilst providing diversity in the energy sector, especially as long-term centralised sources go offline. The Proposed Development is therefore considered to fully comply with the Climate Change Plan.

In Electricity, the Climate Change Plan update (CCPu) announces further policies to continue the rapid growth in renewable generation, moving from a low to a zero carbon electricity system. It commits to publishing an Energy Strategy Update in 2021 that will set out in detail the role that electricity generation will have in the wider energy system.

The Government also commits to reviewing and publishing an updated Electricity Generation Policy statement by 2022 reflecting the contribution that renewable electricity generation is likely to have in delivering on the Net Zero target.

Efforts will continue to be directed to ensuring a sustainable security of electricity supply, including a 2021 call for evidence and views on technologies including energy storage, smart grid technologies and technologies to deliver sustainable security of supply.

It is recognised that the electricity system will have deepened its transformation for the better, with over 100% of Scotland's electricity demand being met by renewable sources.

The CCPu draws particular attention to the demonstration project delivered by Scottish Power Renewables at its Dersaloch Wind Farm looking at the potential for delivering black start from wind, using "virtual synchronous machines" (VSM) to regulate the frequency and voltage of the power from the wind turbines to keep the local electricity system stable and balanced, throughout the process of restoring the part of the system that had been blacked out. It recognises the value of developing expertise that will be critical to net zero both nationally and around the world. The Scottish Government commits to continued support of the development of technologies that can support sustainable security of supply, with renewable generation delivering technical services that currently depend on fossil fuel power stations.

The CCPu lists the Policies and Proposals to deliver on a number of key outcomes:

Outcome 1: *The electricity system will be powered by a high penetration of renewables, aided by a range of flexible and responsive technologies.*

On the Policy side the Government will maintain policies that support the development of a wide range of renewable technologies and improvements to electricity generation and network asset management, including network charging and access arrangements that encourage the deployment and viability of renewables projects in Scotland. It will also publish a revised and updated Energy Strategy, reflecting our commitment to net zero and key decisions on the pathways to take us there.

The CCPu Proposals to deliver on the objective include:

- The introduction of a new framework of support for energy technology innovation, delivering a step change in emerging technologies funding to support the innovation and commercialisation of renewable energy generation, storage and supply.
- Maintaining the renewed focus on developing local energy projects and models.
- Carrying out detailed research, development and analysis during 2021 to improve our understanding of the potential to deliver negative emissions from the electricity sector.
- To review the energy consenting processes, to make further improvements and efficiencies where possible, and seeking to reduce determination timescales for complex electricity generation and network infrastructure applications.
- To review and publish an updated Electricity Generation Policy Statement ahead of the next Climate Change Plan.

Outcome 2: *Scotland's electricity supply is secure and flexible, with a system robust against fluctuations and interruptions to supply.*

The CCPu introduces a new policy that supports the development of technologies which can deliver sustainable security of supply to the electricity sector in Scotland and ensure that Scottish generators and flexibility providers can access revenue streams to support investments.

CCPu Proposals will maintain the current pressure on the UK Government for market mechanisms and incentives which recognise locational value, both for energy and for security of supply, and which do not create undue barriers for investment in Scotland.

It also maintains the position on working with all parties to secure maximum benefits from the move towards smarter and more flexible electricity systems and networks, as set out in the UK Smart Systems and Flexibility Plan (2017) and will continue to encourage and support increased interconnection which can enhance Scottish system security while considering effects on domestic capacity and investment.

New proposals include launching the call in 2021 for evidence and views on technologies that can transform the electricity system, including energy storage, smart grid technologies, and technologies to deliver sustainable security of supply and ensuring that sustainable security of electricity supply is included as a priority within future Scottish Government energy innovation funding programmes.

Outcome 3: *Scotland secures maximum economic benefit from the continued investment and growth in electricity generation capacity and support for the new and innovative technologies which will deliver our decarbonisation goals.*

Under outcome 3 a new proposal is to identify and support major infrastructure improvements to ensure that Scotland's supply chain companies and facilities can benefit from the continued growth of renewable energy.

The Proposed Development gains major support from the CCPu.

The output from the proposed solar farm (>50MW) would make a substantial contribution to the nation's electricity needs and the Government's energy objectives as outlined above. The weight of these contributions must be taken into consideration when assessing the impacts of the proposed development.

5.7 Renfrewshire's Plan for Net Zero

Renfrewshire's Plan for Net Zero is a non-statutory document published by Renfrewshire Council, which sets out how the area will work towards net zero by 2030. The document is the first phase in the Council's overall plan for net zero, which includes the preparation of quantified delivery plans and an adaptation plan for Renfrewshire.

The Plan aims to identify and prioritise action across all sectors to enable change to work towards net zero, under five targeted outcome areas of activity:

- Clean Energy;
- Sustainable Transport;
- Circular Economy;
- Connected Communities; and
- Resilient Place.

One of the key priority areas under Clean Energy is maximising sustainable energy generation, including the use of energy storage. In order to monitor progress of Renfrewshire's journey to net zero, the Plan identifies a series of metrics of success which can be quantified and measured. One of the Clean Energy metrics is the percentage of total energy (including transport) generated locally from renewables.

The Proposed Development complies with the aims of Renfrewshire Council's Plan for Net Zero.

6 CONCLUSION

This statement has been prepared in order to accompany an application for Section 36 consent with deemed planning permission submitted to the Scottish Government's ECU, for the Proposed Development of solar PV farm and a battery energy storage facility with associated ancillary development on existing agricultural lands at Houston.

The Scottish Ministers will determine this Application having evaluated whether the Applicant has fulfilled the statutory duties in Schedule 9 of the Electricity Act.

This Statement has illustrated how through careful site selection the Applicant has avoided impacts on the resources identified in Schedule 9. In addition, the Applicant has identified appropriate design and other measures designed to avoid or minimise impacts on the environment. The Scottish Ministers must have regard to the Energy policy documents referenced above. The proposals gain strong support from them. Furthermore, the Proposed Development accords with the Development Plan and other policy documents.

The Proposed Development's location and site characteristics ensures that it will have a minimal impact upon its immediate surroundings. The design which has emerged through an iterative process avoids/mitigates unacceptable disturbance and impacts with sensitive receptors such as nearby residencies and landscape, natural and historically designated areas.

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

- The Proposed Development complies with the relevant Renfrewshire LDP2. It can also draw support from a number of material considerations;
- The Proposed Development is designed to support the flexible operation of the National Grid and decarbonisation of electricity supply in support of EU targets, national energy policy and national planning policy;
- The Development Site is not in a sensitive location in respect of critical environmental considerations including landscape designations, natural and cultural heritage, noise, air, hydrology and flood risk considerations;
- The Proposed Development is sensitively located in a rural location with only a limited number of sensitive receptors in the vicinity, none of whom will suffer significant adverse impacts from the Proposed Development;
- The Development will result in significant economic benefits including the creation of significant direct and indirect employment during construction, employment during operation through the project's wider economic stimulus and significant exchequer benefits through rates payments;
- The design of the Proposed Development buildings have been taken into great consideration, and are considered to be appropriate and in keeping with and respectful of their immediate surroundings;
- The Proposed Development will make a significant contribution to the delivery of Scotland's ambitious renewable energy generation targets and assist in enhancing the efficiency and security of energy supply. The proposed solar farm will generate approximately 75,000,000 kilowatt hours (kWh) per annum powering 18,100 homes every year; and
- The strong support for the Proposed Development in existing and emerging Government policy and strategies.

Overall, it is considered that the Proposed Development complies with the relevant policies of the statutory Development Plan and other material considerations. It offers significant benefits which have been listed throughout this Statement, which outweigh any minor effects of the Proposed Development.

Given the combination of the above factors, it is respectfully requested that Section 36 consent with deemed planning permission for this Proposed Development is approved by the Scottish Ministers.