



Report by Chief Planning Officer
Planning and Climate Change Policy Board: 27 August 2024

Reference No	23/0622/EB
Application Type	Electricity Undertaking Determination
Proposal	Installation of a solar farm and battery energy storage system and associated infrastructure with a generating capacity of up to 100mw (Energy Consents Unit consultation request)
Location	Site Between Turningshaw Farm and Knowes Farm, Houston Road, Houston, Johnstone
Ward	10 – Houston, Crosslee and Linwood
Community Council	Houston Community Council
Applicant	Energy Consents Unit Scottish Government
Recommendation	Defer decision
All plans, reports, documents, and representations relating to this application can be viewed in full online at https://www.energyconsents.scot/ApplicationDetails.aspx?cr=ECU00004825	

The purpose of this report is to present for the consideration of the Planning and Climate Change Policy Board a formal consultation from the Energy Consents Unit (ECU) on an application made under Section 36 of the Electricity Act 1989 for a 100MW solar farm and battery energy storage system and associated infrastructure on land between Turningshaw Farm and Knowes Farm, Houston Road, Houston, Johnstone. The Section 36 application includes an application for deemed planning permission for the same development under Section 57(2) of The Town and Country Planning (Scotland) Act 1997.

Scottish Ministers are responsible, under Section 36 of the Electricity Act 1989, for the authorisation of any new, or extensions to existing, electricity generation schemes with a generation capacity in excess of 50 Megawatts (MW). As the proposed solar farm and battery energy storage system would have a maximum installed capacity of 100MW, Renfrewshire Council has been formally consulted on the proposed development by the ECU in terms of Section 36 of the Electricity Act 1989.

The Council is a formal consultee in this process and not the determining or consenting authority. Scottish Ministers are the determining authority. In procedural terms the Council, as Planning Authority, requires to provide a response to the ECU that would then be taken into consideration as part of the consenting process.

The consultation from the ECU was received on the 31st October 2023, with an initial response deadline of the 29th February 2024. The deadline has subsequently been extended to the 29th March 2024 and then to the 28th May 2024 due to several deficiencies within the submission which require to be addressed. These deficiencies are set out in the below assessment. The current deadline for a response is the 30th August 2024.

In response to the ECU consultation the Council can either:

- Offer no objections to the Section 36 application as submitted;
- Offer no objections subject to the imposition of appropriate conditions and/or legal obligations it considered necessary to make the development acceptable (it should be noted that responsibility for discharging conditions and/or the legal obligations would fall upon the Council), or;

- Object to the application, stating the grounds on which the objection is made. Members should note at this point that a decision to object to the application would trigger a public local enquiry in terms of Section 62 and schedule 8 of the Electricity Act 1989.

However, in this instance given the deficiencies within the submission it is not considered that the Council is in a position to issue a formal response at this stage. It is recommended that the decision on the consultation is deferred for the reasons outlined in the below assessment and conclusion.

While the consultation response would normally fall within the scheme of delegation to be determined by officers, the scheme of delegation allows for officers to refer applications to the Board. The application has been referred in this instance to allow the proposed development to be fully considered given the scale of the development and the potential environmental matters associated with solar farms and battery energy storage facilities.

Proposal and Site Description

The proposed development is for a solar farm and battery energy storage system and associated infrastructure with a generating capacity of up to 100MW. It comprises of the solar PV panels with associated sub stations, cctv cameras and permitter post and wire fencing, the battery energy storage facility, and the associated internal service tracks.

The application site boundary extends to approx. 129 hectares of land to the east of Houston which is bisected by the B790. Approx. three quarters of the solar panels will be positioned on land to the north of the B790 either side of Turningshaw Road. This area predominantly comprises of flat agricultural land with pockets of woodland to the west and east. Approx. one quarter of the solar panels will be positioned on land to the south of the B790 either side of Moss Road. This part of the development is also proposed to accommodate the battery storage area. Again, this area predominantly comprises of flat agricultural and grassland with pockets of woodland to the south.

Pre-Application Consultation with Officers

The Scottish Government strongly encourages constructive pre-application discussions between prospective applicants and the planning authority. Pre-application discussions seek to identify key planning considerations at an early stage and help inform what supporting information is required to support a subsequent application.

Pre-application discussions have taken place, focusing on the following matters:

- The visual impact of the proposals, and the consenting process.

Negotiated Improvements

Following submission, the following changes have been negotiated between officers and the applicant:

No changes have been negotiated.

Site History (if applicable, site history will be listed here)

None

Consultations

Glasgow Airport Safeguarding – Have issued a holding objection pending review of the glint and glare assessment.

Environment, Housing & Infrastructure (Env. Protection) – No objection subject to condition relating to noise from plant, machinery, and equipment.

NATS – No objection.

Chief Executive's Service (Roads Development) – There are no objections to the development. However, a suite of wide ranging comments have been provided which cover matters relating to required amendments to the Transport Statement, the implementation of the development and management of the construction phase, access, intervisible passing places and the impact on the local road network, active travel requirements, and mitigation in relation to glint and glare.

Scottish Power Networks (Transmission Sites) – No comments.

Scottish Power Networks (Distribution Sites) – No objections.

West Of Scotland Archaeology Service - No objection subject to condition relating to the implementation of a programme of archaeological works.

Scottish Gas Networks - Formal objection until a detailed consultation has taken place.

Ironside Farrar Ltd (IFL) (Council's Independent Consultants) - IFL were asked to review and provide comment on the following aspects of the project.

Glint and Glare – IFL consider the applicant's assessment of the potential glint and glare impact to be robust, and agree that if the landscape mitigation plan and recommendations set out within the assessment are followed, there will be sufficient screening between the proposed arrays and the affected ground-based receptors which are neighbouring residential properties and the local road network. It is advised that Glasgow Airport are consulted to confirm if the predicted glare toward the air traffic control tower can be accommodated. Glasgow Airport Safeguarding have been consulted on the application as noted above.

Decommissioning, Restoration and Aftercare – The documentation submitted in support of the application has been reviewed to determine the areas which are relevant to and may have implications for the decommissioning of the development. A list of matters to be considered within a decommissioning plan is provided for inclusion within an appropriately worded condition.

Ecology – IFL advise that the Habitat Regulations Assessment (HRA) report is well written and well evidenced but does not concur with advice given by NatureScot in their consultation response with regard to the assessment of the development within the context of the Black Cart SPA conservation objectives and does not use NatureScot's HRA proforma. The report requires to be updated in this regard.

The Ecological Impact Assessment is a competent Preliminary Ecological Appraisal however several matters require attention including lack of survey data, no mention of the impact of panel glint and glare on breeding birds, and no mention of NPF4 and particularly the policy on biodiversity net gain.

Land Capability for Agriculture - The submission requires updating to refer to relevant planning guidance, review of the carbon and peatland map 2016, further detail regarding potential impact on peat and the Site of Importance for Nature Conservation (SINC) on the southern boundary which is crossed by a track, and further details on measures to limit impact on prime quality agricultural land and carbon rich soils in line with council guidance and NPF4 policy.

Landscape and Visual Impact Assessment – IFL advise that the conclusion of the LVIA is reasonable, in that higher/ potentially significant effects would be relatively limited in extent and close to the site due to the low-lying topography and screening by surrounding woodland and hedges. IFL agree with the applicant's conclusion that more distant views and effects would be very limited in extent and magnitude. The proposed landscape measures are appropriate but could be strengthened in places to reduce effects on the closest receptors.

The ECU consulted widely on the Section 36 application and a list of those who have responded (and who have not also been consulted by the Council), along with a summary of their comments, as shown on the ECU website, are provided below.

Houston Community Council - No objections to the principle of the application, subject to recommendations in relation to screening and biodiversity gain. The Community Council also advise that they welcome collaboration with the developers with respect to potential community benefits.

Scottish Forestry – No objections. Recommend that commitment to design mitigation measures is formalised via condition.

Transport Scotland – No objection.

Historic Environment Scotland – No objection.

SEPA – No objection

NatureScot – Initially objected to the development. However, this objection was withdrawn on the basis that conditions relating to the timing of the works outwith the wintering period from October to April would be imposed. Whilst the advice from IFL on the HRA is noted, this is considered to be superseded by the revised NatureScot response.

Health and Safety Executive – No comment.

Scottish Water – No objections.

MOD – No objection.

RSPB - Objects to this proposal due to the current lack of information to support the applicant's conclusion that there will be a negligible impact from the loss of Whooper Swan foraging habitat.

Representations

The consultation request was published on the Councils weekly list of applications. No representations have been submitted to the Council.

The ECU also publicise the consent application, and representations can be submitted directly to them via their website. At the time of writing there are four letters of representation, three of which object to the development and one in support of the development.

Policy Context

As noted above the Council is a consultee in the consenting process and not the determining authority. To inform the Council's consultation response an assessment against the

Development Plan is required. In this instance the Development Plan consists of National Planning Framework 4 (NPF4) and the Renfrewshire Local Development Plan (2021) (LDP).

The following provisions of the Development Plan are considered relevant to this submission.

National Planning Framework 4

Policy 1 – Tackling the climate and nature crisis
Policy 2 - Climate mitigation and adaptation
Policy 3 – Biodiversity
Policy 4 - Natural places
Policy 5 - Soils
Policy 6 - Forestry, woodland and trees
Policy 7 - Historic assets and places
Policy 8 - Green belts
Policy 11 - Energy
Policy 13 - Sustainable transport
Policy 14 - Design, quality, and place
Policy 22 - Flood risk and water management
Policy 23 – Health and safety principles

Full details relating to the policies of the NPF4 can be found [online](#).

Renfrewshire Local Development Plan

Policy ENV1 - Green Belt
Policy ENV2 - Natural Heritage
Policy ENV3 - Built and Cultural Heritage
Policy ENV4 - The Water Environment
Policy ENV6 - Soils
Policy I1 - Connecting Places
Policy I3 - Flooding and Drainage
Policy I4 - Renewable and Low Carbon Energy Developments

Full details relating to the policies of the LDP can be found [online](#).

New Development Supplementary Guidance

Submitted Reports and Assessments

The following reports and assessments were submitted in support of the application:

Ecological Impact Assessment – Assessment considers the likely impact of the development on ecological receptors across the development site and in neighbouring areas. Ecological receptors identified include designated sites and habitats, badgers, water voles, bats, breeding birds and wintering geese. A number of measures have been incorporated into the design of the development to minimise impact on these receptors. This includes buffer zones around trees and water courses, raising deer fencing off the ground to permit movement of small animals, and no permanent lighting is proposed.

Flood Risk Assessment – Report notes that development has been set out to avoid functional flood plains and medium to high risk areas. A buffer of between 5m and 10m has been used in the siting of the panels either side of any watercourse or drain. The proposals will not increase the rate of discharge from the current pre-development surface water run-off rates, and no formal drainage system will be installed. The development is at low risk of flooding and will not increase flood risk elsewhere.

Glint and Glare Assessment – Assessment notes that solar reflections are possible on sections of Houston Road, Bridge of Weir Road and the B790. However existing vegetation and buildings will obstruct views from Houston Road and Bridge of Weir Road and no impact is predicted. Mitigation is recommended for a 200m section of the B790. For eight dwellings a low impact is predicted, and mitigation is not proposed. Screening is proposed for two dwellings as per the landscape mitigation plan. Glare towards the air traffic control tower at Glasgow Airport is possible but indicate that it could be accommodated.

Habitats Regulations Assessment Appraisal – The assessment concludes that there is no potential for adverse effects on site integrity for any European/Ramsar sites either alone or in combination with other plans and projects. The development can be undertaken in adherence with the requirements of the Habitat Regulations.

Heritage Assessment – The assessment identifies one designated heritage asset in the site, the category B listed Fulwood Bridge. A listed building consent application will be submitted if the bridge is used as a cable crossing. Considered to be low potential for unrecorded archaeology to be present. Proposed that an archaeological programme of works targeting an area of higher ground with moderate potential for archaeological assets is undertaken.

Land Capability for Agriculture Report – The report notes that the majority of the site is assessed as class 3.2 or lower, which does not comprise prime land. Approx 2.4 hectares (8%) of the site is assessed as class 3.1 which is defined as prime land. Mitigation for the use of this land is that the land can continue to fulfil an agricultural purpose during the operation of the solar farm, there would be no permanent loss of the resource, and the land would be restored to agricultural use following completion of the solar farm operations. Development would not compromise the local supply of prime agricultural land in this regard.

Landscape and Visual Impact Assessment – The assessment notes that 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 within this landscape character area. Landscaping is proposed on the western and north eastern field boundaries within the Houston North Parcel, and along Moss Road at the South Parcel. This will strengthen hedgerows and site boundaries. Predicted effects are limited in extent by the low-lying nature of the site, surrounding woodlands, hedgerows and other vegetation, and undulating topographical changes in the surrounding landscape.

A total of 13 viewpoints have been assessed. Two viewpoints are predicted to have moderate to major effects however these will be mitigated by landscape planting. Landscape planting is also proposed to mitigate effects on residential properties.

Noise Impact Assessment – The assessment notes that noise monitoring was undertaken at two locations representative of noise sensitive receptors in the vicinity of the site. Predicted operational noise was compared with the measure of background noise, and the results show no noise impact is expected due to the operation of the proposed development.

Planning Support Statement – The statements notes that the development will generate approx. 75,000,000 kilowatt hours of electricity per annum. The development site is not within a sensitive location in respect of critical environmental designations. There are a limited number of sensitive receptors in the vicinity, none of whom will suffer significant adverse impacts. Overall, it is considered that the proposed development complies with the relevant policies of the statutory development plan and other material considerations.

Pre-application Consultation Report – The developer has undertaken a meaningful and effective voluntary period of pre-application consultation. This includes provision of a dedicated website, a letter drop to local residents within the immediate vicinity of the site,

and a public consultation event. The applicant has also met with Houston Community Council.

Transport Statement – The assessment considers traffic generation associated with the most onerous week of the construction phase and concludes that the construction phase will not have a significant impact upon the surrounding highway network. The operational phase will have an insignificant impact upon the surrounding road network, with anticipated generation of 2-3 vehicle trips per week for general maintenance.

Scottish Ministers Direction

In determining a planning application, the Council is required to provide details of any Direction made by Scottish Ministers under Regulation 30 (Directions requiring consultation), Regulation 31 (Directions requiring information), Regulation 32 (Directions restricting the grant of planning permission) and Regulation 33 (Directions requiring consideration of condition) of The Town and Country Planning (Development Management Procedure) (Scotland) Regulations 2013, or under Regulation 50 (that development is EIA development) of The Town and Country Planning (Environmental Impact Assessment) (Scotland) Regulations 2017.

None.

Planning Assessment

The application has been submitted to the ECU under Section 36 of the Electricity Act 1989. Unlike a planning application, there is no requirement that the application be determined in accordance with the development plan. Instead, the development plan is one of a number of material considerations which require to be taken into account by the ECU in their determination of the application.

To inform the Council's consultation response to the ECU, the development plan represents the appropriate document against which to base the Council's assessment of the application. The development plan comprises of the National Planning Framework 4 (NPF4) and the adopted Renfrewshire Local Development Plan 2022 (LDP).

The application site is located within the green belt. Policies ENV1 of the LDP and 8 of NPF4 both consider renewable energy developments to be an acceptable form of development within the green belt in principle.

The proposal must thereafter be assessed against the detailed development criteria set out within the green belt policies. This includes the green belt development criteria set out within the New Development Supplementary Guidance which will be assessed in turn as follows.

The supporting information indicates that part of the site would be classified as prime quality agricultural land. The applicant has sought to justify development of this land on the basis that it can still fulfil an agricultural use while the solar farm is operating, and as the solar farm is temporary there would be no long-term loss of the resource.

The Council's independent consultants have advised that the supporting information requires updating on several aspects including further details on measures to limit impact on prime quality agricultural land and carbon rich soils in line with council guidance and NPF4 policy. The submission therefore requires updating to address these matters before compliance with policies 5 of NPF4 and ENV6 of the LDP on soils can be demonstrated.

There is no impact on wild land.

The Roads Development Officer has not objected to the development. However, a suite of comments is made with regard to both the submitted Transport Statement and the implementation of the development. Implementation includes requirements relating to site access, intervisible passing places, road maintenance and provision of other infrastructure such as turning facilities. It is considered that these requirements could be managed via a construction traffic and environmental management plan with regard to their implementation. This would seek to ensure the infrastructure is accommodated as sensitively as possible. The Transport Statement requires to be updated to take into account the comments from Roads Development.

It is not anticipated that the development would give rise to significant effects on public water supply or water courses from pollution risk. It is noted that SEPA, Scottish Water and Environmental Protection have not objected to the development on these grounds.

The application site includes two core paths, LIN/1 along Moss Road and BBH/1 at North Mains. A condition could be recommended to ensure these paths (and any other existing active travel routes) are kept open at all times through the construction and operation of the development, with any proposed closures requiring the prior written permission of the Council.

With regard to impact on local landscape character, the supporting information includes 13 viewpoints from which the potential impact of the development has been assessed. The predicted effects at the majority of these viewpoints are limited in extent by the low-lying nature of the site, surrounding woodlands, hedgerows and other vegetation, and undulating topographical changes in the surrounding landscape. Of the two viewpoints whereby moderate to major effect is predicted, landscaping is proposed as mitigation. Landscaping is also proposed to mitigate potential impact on residential properties.

The Council's independent consultant has advised that the conclusions within the applicant's supporting information are reasonable, in that higher/ potentially significant effects would be relatively limited in extent and close to the site due to the low-lying topography and screening by surrounding woodland and hedges. More distant views and effects would be very limited in extent and magnitude. The proposed landscape measures are appropriate but could be strengthened in places to reduce effects on the closest receptors. An enhanced landscape strategy could be sought via a recommended condition.

The development has been designed to respect important landscape features such as woodlands, water courses and field boundaries. It is noted that some field boundaries will be reinforced as part of the landscape strategy.

Where field boundaries require to be removed to accommodate sight lines at the access points, the landscape strategy could seek replanting of the hedgerow in an alignment that accommodates the sight lines.

It is noted that Scottish Forestry have offered no objections to the development and have recommended a condition to ensure mitigations included within the proposed design are delivered. This includes buffer zones between the development and adjacent woodland.

In addition to the woodland adjoining the site, the panels have also been set back from all watercourses. The proposed deer stock boundary fencing is acceptable at this location. There is no security lighting proposed at present, with CCTV cameras utilising infra-red technology. Conditions could be recommended to ensure the final design and location of all boundary treatments and any lighting strategies for the site are agreed with the Council.

In addition to the solar panels which are the primary infrastructure component, the development also includes inverter containers and battery storage infrastructure. While the inverter containers are dispersed throughout the layout, the battery element is concentrated in the south east corner of the area to the south of the B790. It is noted that the battery storage area does not include any specific landscape screening. While wider external views of this area are mitigated by woodland, in the interest of visibility from Moss Road it is considered that this area would benefit from landscape screening. This requirement could be built into a landscaping condition.

With regard to servicing, the connection between the development and the national grid is ultimately a matter for the applicant to agree with Scottish Power Energy Networks (SPEN). It is noted that SPEN have not objected to the development.

NatureScot have offered no objections to the development with regard to its impact on nationally designated sites. This is subject to conditions relating to construction works taking place outwith the wintering period from October to April. If works have to be undertaken within the wintering period, no such work will take place when whooper swans are feeding within 200m of the development site boundary. The location of the swans must be confirmed by a suitably qualified ecological clerk of works. These conditions will protect the qualifying interest of the Black Cart SPA.

It is noted that IFL have advised the Council that the HRA report requires to be updated. However, this advice is considered to be superseded by NatureScot's updated consultation which advises that the impact of the development will not adversely affect the integrity of the Black Cart SPA provided the conditions in relation to the timing of construction works are applied.

It is noted that the RSPB have objected to the development due to the lack of information over the potential impact on the loss of whooper swan feeding habitat. However, the consultation response from NatureScot advises that in this specific case there will continue to be sufficient feeding habitat within the area available to whooper swans roosting at the SPA post-development to support a qualifying winter population of 161 individuals.

With regard to local designations, the site is bound by Sites of Importance for Nature Conservation (SINC) designations at Barochan Moss to the north and Linwood Moss Wood to the south. The development is set back from Barochan Moss, and significant impact on this SINC is not anticipated. While no component infrastructure is located within Linwood Moss Wood, the layout includes an access track which cuts through the SINC boundary. The Council's independent consultants advise that further information on the potential impact of the access track on the SINC is required.

With regard to the ecological impact of the development, the applicant's submission indicates that a number of measures have been incorporated into the design of the development to minimise impact on ecological receptors (namely protected species). However, the review undertaken by the Council's independent consultants indicates several matters which require attention including lack of survey data, no mention of the impact of panel glint and glare on breeding birds, and no mention of NPF4 and particularly the policy on biodiversity net gain.

The development does not include the conversion of any buildings.

The above assessment is against the provisions of LDP policy ENV1. With regard to NPF4 it is noted that the supporting planning statement does not include a full assessment of the development against the detailed assessment criteria within NPF4. The supporting statement only refers loosely to policy 3 and 11 of NPF4. Additionally, it also refers to NPF3

and Scottish Planning Policy (SPP) which no longer form part of the development plan. The supporting statement requires to be updated to reflect NPF4 and all applicable policies within.

The criteria set out within Policy 8 of NPF4 that have not already been addressed above can be considered as follows.

The scale and nature of the development necessitates a green belt location.

The purpose of the green belt and its long term environmental quality would not be undermined. The operational lifespan of the project is 40 years, at which point it would be decommissioned and the land returned to its current use. Conditions could be recommended to safeguard this.

Landscape character and visual impact has been assessed above.

Policies 14 of the LDP and 11 of NPF4 seek to support development proposals for renewable and low carbon energy developments in principle. This includes energy storage.

Policy 14 includes several detailed assessment criteria which will be considered in turn as follows.

The potential impact of the development with respect to local environment, landscape character and the natural environment has been discussed above.

It is noted that Historic Environment Scotland have not objected to the development with regard to its potential impact on above ground built heritage assets. The West of Scotland Archaeology Service have recommended a condition with respect to the implementation of a programme of archaeological works.

Potential impact on the water environment can be mitigated through the incorporation of a strategy to manage surface water and pollution control. A condition is recommended with respect to the sustainable drainage of surface water.

With regard to the amenity of neighbouring residential properties, the principal matters identified in the applicant's submission relate to visual impact and glint and glare. With regard to visual impact, moderate to major effects are anticipated at two semi detached cottages at North Mains and a two storey farmhouse on Turningshaw Road. However proposed mitigation in the form of landscape planting will ensure these impacts are not significant. The Council's independent consultant has advised that the proposed landscape measures could be strengthened to reduce the impact on these closest receptors. An enhanced landscape strategy could be sought via a recommended condition. This could also include the application of privacy netting to the boundary fencing to provide immediate screening while the landscaping matures. The species and density of planting would also require to be clarified.

The glint and glare assessment indicates that views of the reflecting panels are possible towards ten of the eighty-two dwellings assessed. For eight of these a low impact is predicted. For the remaining two the impact will be mitigated by the proposed landscaping scheme.

The Council's independent consultants conclude that the applicant's assessment of glint and glare is robust, and the conclusions appear reasonable if applied conservatively. It is noted above that an enhanced landscape strategy and the application of privacy netting could be

sought via condition to further mitigate glint and glare impact. The solar panels could also be required to incorporate an anti-reflective coating.

Environmental Protection have recommended a condition to limit noise from plant and machinery. There are no concerns raised from any consultees regarding air quality or pollution control. Shadow flicker is not relevant to the proposed development. There is no lighting scheme proposed as part of the development. CCTV cameras will use infra-red technology.

The development will not have a detrimental impact on outdoor sport or recreation interest.

The glint and glare assessment recommends mitigation on a 200m section of the B790 due to solar reflections occurring within a road users' primary field of view. The proposed landscape strategy only partially reflects the recommendations, and will require to be enhanced to ensure the impact is fully mitigated. This could be addressed via the submission of the enhanced landscape strategy.

Roads Development have advised that the glint and glare submission does not consider other "public roads". It is recommended that 20m deep woodland screening should be provided along the roadsides to mitigate road users against Glint and Glare. This could be required as part of the enhanced landscape strategy.

Transport Scotland have offered no objection to the development with regard to potential impact on the trunk road network.

Glasgow Airport Safeguarding have issued a holding objection due to concern over the predicted glint and glare impact on the air traffic control tower. At the time of writing this holding objection has not been removed. It is not therefore possible to determine whether the development would ensure the safe and efficient operation of Glasgow Airport as required by Policy I4.

The site is not within a potential heat network opportunity area.

With regard to the relevant criteria within the New Development Supplementary Guidance on renewable and low carbon energy developments (not already discussed above), conditions could be used to ensure arrangements are in place to restore the site to an acceptable standard after the operation of the solar farm and battery storage development has ceased. This includes the submission of decommissioning and restoration strategies, and also a bond or other financial guarantee to ensure funds are set aside for decommissioning and that the Council can call upon these funds to undertake the work if necessary. The advice from the Council's independent consultant is noted with regard to the key considerations associated with the decommissioning and restoration of the development. These considerations could be included within the recommended conditions.

The development will contribute to renewable energy generation and carbon emission reduction targets. The solar farm element would have the capacity to generate up to approx. 75MW of renewable energy per annum. The battery storage element would have the capacity to provide approx. 25 MW of generating capacity through storage of excess energy. The applicant states that the development as a whole would make a "significant contribution to the delivery of Scotland's ambitious renewable energy targets and assist in enhancing the efficiency and security of energy supply".

Policy 11 of NPF4 sets out various criteria to be assessed when considering energy developments. As noted above, the submitted planning statement does not include a review

of the development against these considerations. However, on assessment of the information which has been submitted, the following conclusions can be drawn.

In terms of maximising net economic benefit, in addition to the renewable energy generation noted above the development will also result in the creation of 10 full time equivalent jobs during the operational period and approx. 200 full time equivalent jobs during the construction phase.

The consultation provided by Houston Community Council refers to a community benefit package. While this would ultimately be a matter for the community council to negotiate with the developer, it is noted the submission does not make reference to a community benefit package.

There will be no significant impact on international or national designations subject to imposition of the conditions recommended by NatureScot.

Impact on communities and residential dwellings with regard to amenity have been addressed above.

Impact on landscape has been addressed above. It is noted that policy 11 recognises that such impacts are to be expected for some forms of renewable energy. Where impacts are localised and/or appropriate design mitigations have been applied, they will generally be considered to be acceptable.

Public access has been addressed above, as have impact on aviation and the local and trunk road network. It is not anticipated that the development would have a detrimental impact on telecommunications or broadcasting installations. It is noted that the MOD have not objected to the development.

Impact on the historic environment has been addressed above

It is noted that SEPA have not objected to the development with regard to flood risk, hydrology and the water environment.

The applicants state that the removal of intensive farming practices from the site and reversion to grazing by livestock will result in ecological benefits at the site. This is in addition to the ecological enhancement measures set out within the ecological assessment which include the landscaping, grassland management, bat, and bird boxes.

While it is noted that the submission does not include a specific assessment of the development against NPF4 Policy 3 on biodiversity, a condition requiring the submission of a specific biodiversity enhancement and management plan could be recommended to ensure biodiversity gain is delivered as part of the development. The measures set out within the ecological assessment would form the basis of the biodiversity enhancement plan.

Impact on trees, woodland and forestry has been assessed above.

Proposals for decommissioning including the availability of finances have been discussed above.

Finally with regard to cumulative impact, it is noted that two solar developments have been granted on land approx. 2km to the east of the proposed development. These are applications 22/0746/PP at Glasgow Airport and 23/0431/PP between Greenock Road and Houston Road. Given the separation distance and intervening land form and uses (including

woodland, the M8 motorway and railway line), the cumulative impact of these development is not considered to be significant.

The above assessment against policies 8 and 11 of NPF4 and ENV1 and I4 of the LDP notes several inadequacies in the submission which mean it is not possible to determine whether the development is in full compliance with these policies.

The above assessment against these policies also covers matters specific to the other development plan policies noted above.

The development appears to be compliant with policies 6, 7, and 22 of NPF4 with regard to trees and woodlands, built heritage, and flooding and drainage, and the corresponding policies ENV3, ENV4, and I3 within the LDP.

However, the shortcomings of the information currently provided means that compliance with policies 3, 4, 5 and 13 of NPF4 with regard to biodiversity, natural heritage, soils and sustainable transport, and the corresponding policies ENV2, ENV6 and I1 within the LDP has not been fully demonstrated (in addition to policies 8 and 11 of NPF4 and ENV1 and I4 of the LDP).

The development is considered to comply with policies 1 and 2 of NPF4 relating to climate mitigation and tackling the climate crisis. The development will both generate renewable energy, and also store excess energy during times of surplus generation. The development will contribute to the decarbonisation of the electricity grid, and the transition towards greater electricity generation from renewable sources.

The visual impact of the development will be mitigated by the landscape strategy in line with the above assessment. This will reduce the impact of the development on the character of the place with respect to the requirements of Policy 14 of NPF4.

With regard to Policy 23 of NPF4, it is noted that Scottish Gas Networks (SGN) have objected to the development pending further detailed consultation. The development is within proximity of a high pressure gas pipeline, and potential interference on the safe operation of the pipeline must be considered. Mitigation with regard to the proposed development has not yet been agreed.

Section 75 Obligations

The Council is required to provide a summary of the terms of any planning obligation which is required to be entered into under Section 75 of the Town and Country Planning (Scotland) Act in relation to the grant of permission for the proposed development:

A legal agreement to secure decommissioning and restoration of the site would be required.

Conclusion

The approach to the assessment and recommendations within this report reflect the fact that the Council is a consultee under the Electricity Act 1989 and that the ECU are the determining authority.

In conclusion, the proposed development is compliant with the development plan in principle. The development is also considered to be compliant with policies 1, 2, 6, 7, 14 and 22 of NPF4 and ENV3, ENV4, and I3 of the LDP.

However, there are several inadequacies in the submission which have not been addressed, and as a result it is not possible to definitively determine whether the development complies

with policies 3, 4, 5, 8, 11 and 13 of NPF4 and ENV1, ENV2, ENV6, I1 and I4 of the LDP. The deficiencies are summarised as follows.

- No detailed information has been provided on the potential impact of the development, namely the access track, on the Linwood Moss Wood SINC.
- There is a lack of survey data within the ecological assessment, and no mention of the impact of panel glint and glare on breeding birds.
- There is no detailed assessment of the development in general against NPF4, namely policies 3 on biodiversity, 8 on green belts and 11 on energy. The submission requires updating to fully respond to the policies within NPF4.
- Further information is required on measures to limit impact on prime quality agricultural land and carbon rich soils in line with Council guidance and NPF4 policy requirements.
- The Transport Statement requires updating to take cognisance of walkers, cyclists, and equestrian use of the road network within the site, that North Mains Road is a publicly maintained road, crash data prior to the last three years, and traffic count data which is not representative.
- There is a holding objection from Glasgow Airport Safeguarding and on this basis, it has not been demonstrated that the development is compatible with the safe and efficient operation of Glasgow Airport
- There is a holding objection from Scottish Gas Networks and on this basis, it has not been demonstrated that the development is compatible with the safe operation of the high pressure gas pipeline network.

Repeated requests have been made to address these deficiencies. However, an updated submission has not been forthcoming.

As Policies 8 and 11 of NPF4 and ENV1 and I4 of the LDP relate specifically to green belts and energy development and are of most relevance to the development being proposed, it is not considered that the Council can issue a final response to the ECU until the deficiencies noted above are resolved to allow the assessment against these policies to be completed fully.

Notwithstanding the above, it is not considered that the Council should object to the development either. Instead, it is recommended that the board note the application and agree to defer the decision until the deficiencies have been addressed. Authorisation is also sought for officers to make a final request to the ECU to address the deficiencies in the submission, and to allow the Council to consider any updated submission prior to issuing a final response.

Recommendation

Defer decision.

Reason(s) for Recommendation

1. The deficiencies detailed in the bullet points in the Conclusion of the Planning and Climate Change Policy Board report for application 23/0622/EB of 27 August 2024 require to be addressed before the Council is able to provide a final response to the ECU.

For further information please contact James Weir, Development Standards Team, Email: james.weir@renfrewshire.gov.uk