



ARCUS

**COYLTON GREENER GRID PARK
LAND SOUTH OF AYR ROAD, COYLTON
PLANNING STATEMENT**

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Statkraft



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TABLE OF CONTENTS

EXECUTIVE SUMMARY	3
1 INTRODUCTION	4
1.1 Background	4
1.2 The Applicant.....	4
1.3 Need for the Development	4
1.4 Site Selection Criteria.....	8
1.5 The Planning Application Submission	9
2 THE DEVELOPMENT	10
2.1 Overview	10
2.2 Development Infrastructure	10
2.3 Access.....	10
2.4 Construction	11
3 PLANNING HISTORY	12
3.1 Previous Applications	12
3.2 Pre-Application Advice	12
3.3 EIA Criteria and Screening	12
4 KEY LEGISLATION	13
4.1 Town and Country Planning (Scotland) Act 1997	13
4.2 Climate Change Scotland Act 2009	13
4.3 The Climate Change (Emissions Reduction Targets) (Scotland) Act 2019 ..	13
5 ENERGY POLICY: THE NEED TO ADDRESS CLIMATE CHANGE	14
5.1 International, European and UK Policy Context	14
5.2 Scottish Climate Change and Energy Policy.....	17
6 PLANNING POLICY.....	21
6.1 National Planning Framework 3 (NPF3)	21
6.2 Scottish Planning Policy (SPP).....	21
6.3 The Development Plan	22
7 RELEVANT MATERIAL CONSIDERATIONS.....	34
7.1 Energy Storage and Management Drivers.....	34
7.2 Climate Emergency.....	34
7.3 Community Renewable Energy Project.....	34

7.4	UK Renewable Energy Roadmap	34
7.5	Net Zero – The UK’s Contribution to Stopping Global Warming	35
7.6	Socio-Economic Benefit.....	35
7.7	Emerging Planning Policy.....	36
7.8	Summary	36
8	CONCLUSION.....	37

EXECUTIVE SUMMARY

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

The Development would provide infrastructure, nearby the existing substation, to help stabilise the grid as well as import and export electricity.

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

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

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

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

1 INTRODUCTION

1.1 Background

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

This Site comprises an area of approximately 1.99 hectares (ha) and is located south of Ayr Road, Coylton, East Ayrshire. The Site is located approximately 2 kilometres (km) northeast of Drongan, 3.6 km west of Ochiltree, 5 km east of Coylton; and adjacent to the existing Coylton substation ('the Site'). The location of the Site and layout of the Development are shown on Planning Drawings 1 and 2, respectively.

The Application for the Development is made under the Town and Country Planning (Scotland) Act 1997¹ ('the Planning Act 1997'), as amended by the Planning etc. (Scotland) Act 2006² ('the Planning Act 2006') and the Planning (Scotland) Act 2019³ ('the Planning Act 2019').

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

1.2 The Applicant

The Applicant is Statkraft UK LTD. Statkraft is 100% owned by the Norwegian state and is Europe's largest generator of renewable energy. In the UK Statkraft develop, own and operate wind, solar, hydro and Greener Grid Park projects. Since 2006 Statkraft has invested over £1.4 billion in the UK's renewable energy infrastructure and is a leading provider of Power Purchase Agreements (PPAs), having facilitated over 6 GW of new-build renewable energy generation through PPAs. Statkraft is contracted to deliver grid stability services to National Grid ESO, supporting their target to deliver a zero-carbon electricity system by 2025. The first two projects in Moray and Liverpool are currently in construction.

1.3 Need for the Development

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

In September 2021, the National Grid released clarifications⁴ on the role that interconnectors and stabilising technology plays in the wider renewable energy industry, acknowledging that they would:

- Play a vital role in helping us to reach Net Zero;
- Help to reduce energy costs;

¹ Scottish Government (1997) Town and Country Planning (Scotland) Act 1997 [Online] Available at: <https://www.legislation.gov.uk/ukpga/1997/8/contents> (Accessed 14/10/2021)

² Scottish Government (2006) The Planning etc. (Scotland) Act 2006 [Online] Available at: <https://www.legislation.gov.uk/asp/2006/17/contents> (Accessed 14/10/2021)

³ Scottish Parliament (2019) *Planning (Scotland) Act 2019* [Online] Available at: <https://www.legislation.gov.uk/asp/2019/13/contents/enacted> (Accessed 14/10/2021)

⁴ National Grid (2021) *Interconnectors – separating the myths from the facts* [Online] Available at: <https://www.nationalgrid.com/stories/engineering-innovation-stories/interconnectors-separating-myths-facts> (Accessed 14/10/2021)

- Play a critical role in sharing clean energy between the UK and the EU; and
- Help the UK to reduce our carbon emissions.

Renewable energy and the ability to successfully manage its supply is critical to stabilising fluctuating fuel prices⁵. As fossil fuel generating stations are constrained by resources there is an inevitable price fluctuation. Whereas a system that prioritised well-balanced, renewably sourced electricity would not be affected by the same market-related volatility.

As such, there is a growing demand by network operators for a broad range of services such as storage and management. The Development is designed to support the flexible operation of the National Grid and the decarbonisation of the electricity supply.

The Atkins Report – Engineering Net Zero – The Race to Net Zero 2020⁶ dispels the myth that the UK can achieve Net Zero without further concerted action in relation to how we generate and distribute electricity.

This Report quantifies the minimum requirement for new generation of energy to meet Net Zero by 2050 at 250 GW, with the UK system needing between 15 and 30 GW of new storage, during this time.

To put this into perspective, *“the UK currently has 3.1GW of capacity in pumped storage plus about 1GW in batteries. We may need up to ten times this to achieve net zero.”*

The proposed Greener Grid Park would provide rapid-response electrical back-up to the National Grid and would represent an early deployment within the UK of a high-tech grid balancing facility. This is required for a number of reasons:

- National Grid Pathfinder;
- Decarbonisation and Climate Change;
- Electricity Market Reform;
- The Capacity Market; and
- Balancing the Network.

1.3.1 National Grid Pathfinder

National Grid are committed, through the Network Option Assessment Stability Pathfinder, to meet a 2025 zero carbon operation target for grid stability services⁷.

Statkraft’s planning application is not only for a Battery Energy Storage System (BESS) but predominately for the installation of Synchronous Compensator(s) to provide Stability to National Grid Energy System Operator (NGESO). This project is called a Greener Grid Park to highlight its function of decarbonising the grid system and enabling greater use of the increasingly abundant transmission connected sources of renewable.

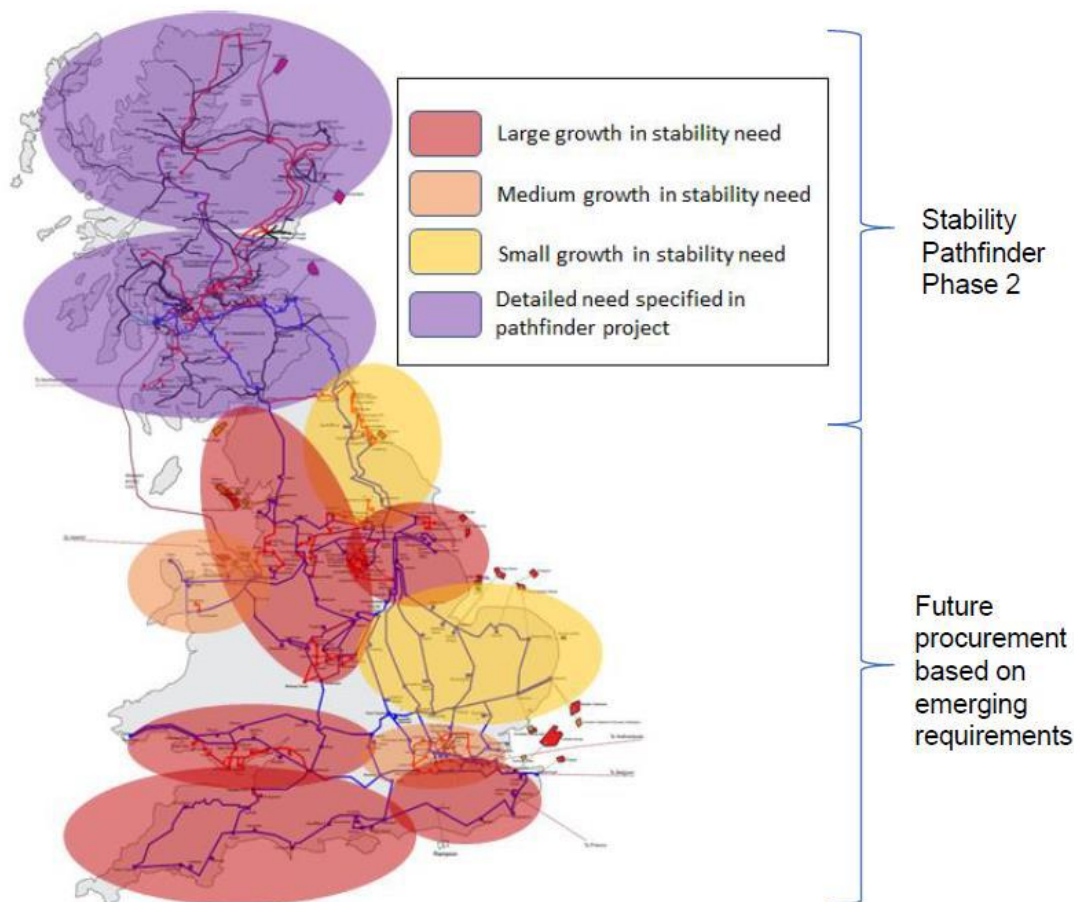
Coylton is in an area identified by NGESO with as an area with need, which has led to the Stability Phase 2 service as shown in Figure 1.1. A grid without inertia is one that is unstable, suffers from issues of power quality and is susceptible to blackouts. Energy sourced from renewable generators such as wind and solar connect to the grid infrastructure in a different way than fossil fuels, and fit for purpose stability infrastructure needs to be developed.

⁵ The Guardian (2021) *Government should have moved earlier to low-carbon, say industry experts* [Online] Available at: <https://www.theguardian.com/business/2021/sep/21/government-should-have-moved-earlier-to-low-carbon-say-industry-experts> (Accessed 14/10/2021)

⁶ Atkins & SNC Lavalin (2020) *Engineering Net Zero: The Race to Net Zero* [Online] Available at: <https://www.snclavalin.com/~media/Files/S/SNC-Lavalin/download-centre/en/report/the-race-to-net-zero.pdf> (Accessed 14/10/2021)

⁷ National Grid (2020) *How our new spin on grid stability is a boost for renewable generation* [Online] Available at: <https://www.nationalgrideso.com/news/how-our-new-spin-grid-stability-boost-renewable-generation> (14/10/2021)

Figure 1.1: Areas of Stability Requirement



In January 2020, Statkraft was successful in NGENSO’s Stability Phase 1 Tender. NGENSO stated that this would save consumers £128 million in the contract period up to 2025/26. Statkraft are constructing two of these projects (one at Keith in Moray, Scotland and one at Lister Drive in Liverpool, England) as reported in Machinery Magazine⁸. The Coylton Greener Grid Park will host similar technology to these developments.

1.3.2 Decarbonisation and Climate Change

Rapid decarbonisation before 2030 is important and valuable in a Climate Emergency. East Ayrshire Council has declared a climate emergency and are committed to achieving Net Zero carbon emissions in line with national targets. Statkraft’s Greener Grid Park is contributing to the Scotland and the UK’s commitment to carbon emissions reductions and combatting climate change, in line with the policy context set out in Section 5 of this Statement.

Statkraft’s Greener Grid Parks are also designed to minimise environmental and social impacts of the grid connection i.e. cables or overhead line connection to the Coylton substation. By siting adjacent to the substation, Statkraft’s project does not impact third parties in this regard.

As a global energy company, strategically focused on scaling renewable energy solutions, Statkraft believes that it can be instrumental in driving progress toward achieving the UN

⁸ Machinery (2021) *Machinery March 2021* [Online] Available at: <https://my.mydigitalpublication.co.uk/publication/?m=65921&i=696681&p=10&ver=html5> (Accessed 14/10/2021)

Sustainable Development Goals (SDGs) by 2030. Statkraft have numerous initiatives that can be linked to different SDGs, these positive impacts are naturally concentrated around the goals for Climate Action (SDG 13). Statkraft contribute directly to climate change mitigation by displacing fossil fuels whilst meeting growing energy demand.

This information has been provided to demonstrate the need for the Coylton Greener Grid Park and to differentiate Statkraft's project from other planning applications which are only for BESS. Whilst these technologies are important for the energy transition and decarbonisation, they are not as effective as Statkraft's proposal in decarbonising the grid and meeting the climate targets set out in Section 5 of this Statement.

1.3.3 Electricity Market Reform

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

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

Electricity Market Reform ('EMR')⁹ is a UK government policy designed to:

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

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

1.3.4 The Capacity Market

Through the Energy Act 2013¹⁰, the Capacity Market mechanism was introduced to ensure security of electricity supply at the least cost to the consumer.

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

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

⁹ UK Government (2012) Electricity Market Reform: Policy Overview [Online] Available at: <https://www.gov.uk/government/publications/electricity-market-reform-policy-overview--2> (Accessed 14/10/2021)

¹⁰ UK Government (2013) Energy Act 2013 [Online] Available at: <http://www.legislation.gov.uk/ukpga/2013/32/contents/enacted> (Accessed 14/10/2021)

1.3.5 *Balancing the Network*

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

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

When unforeseen demand is put on the network, such as when a large power station suddenly comes offline, then the National Grid control room need an alternative source of power. This is achieved with rapid responding facilities such as the Development which can manage the supply of energy as instructed.

As an innovative technology, the Development will provide a flexible and rapid release of electricity to allow the National Grid to regulate electricity supply and demand without any greenhouse gas emissions. Conversely, the Development will also have the capacity to absorb electricity quickly which will allow for the oversupply of the grid to be managed.

1.4 Site Selection Criteria

After detailed consideration of the following factors, the selected site was identified as having excellent potential for development with minimal environmental impacts.

The Development will focus on delivering stability but will also include BESS to allow the project to provide energy storage. BESS can be sited at any location on the transmission or distribution electricity networks, although there are additional locational price signals which encourage projects to locate in areas beneficial to the grid system and electricity market. However, when co-locating stability and BESS technologies, developing anywhere is not possible and Statkraft have to be more selective about the location of the development.

The Development is located adjacent to the Coylton substation, which is part of the National Grid and operated by SP Energy Networks. Given the close proximity to the substation, lengthy transmission cables will not be required, ensuring efficient connection to the National Grid, minimising disturbance and costs. The substation is capable of accommodating the transfer of electricity to and from the Development at an acceptable cost which will provide valuable support to grid protecting local customers at times when high demand places stress on the local and wider electricity network.

As a result of the close proximity to the substation, underground cables will avoid any major infrastructure, minimising connection and transmission costs. The small scale of the underground grid connection required will also significantly minimise construction-related disruption.

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

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

1.5 The Planning Application Submission

As part of the planning application submission to East Ayrshire Council, the following environmental and technical reports are appended to this Planning Statement:

- Appendix 1 – Landscape and Visual Appraisal;
- Appendix 2 – Drainage Impact Assessment;
- Appendix 3 – Preliminary Ecological Appraisal;
- Appendix 4 – Landscape Planting Plan;
- Appendix 5 – Noise Impact Assessment; and
- Appendix 6 – Heritage Statement.

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

- Planning Drawing 1 – Location Plan;
- Planning Drawing 2 – Proposed Site Layout Plan;
- Planning Drawing 3 – Indicative Lube Oil Pump Skid;
- Planning Drawing 4 – Indicative MV/LV Electrical House;
- Planning Drawing 5 – Indicative 2500kVA/690V Transformer;
- Planning Drawing 6 – Indicative 1000kVA/400V Transformer;
- Planning Drawing 7 – Indicative Emergency Diesel Generator;
- Planning Drawing 8 – Indicative Security Column;
- Planning Drawing 9 – Indicative Inverter Cabinets;
- Planning Drawing 10 – Indicative Switchgear Container;
- Planning Drawing 11 – Indicative Noise Attenuation Fence;
- Planning Drawing 12 – Indicative Palisade Fence Detail;
- Planning Drawing 13 – Indicative Palisade Gate Detail;
- Planning Drawing 14 – Indicative Battery Container;
- Planning Drawing 15 – Indicative Transformer;
- Planning Drawing 16 – Indicative Synchronous Compensator Building;
- Planning Drawing 17 – Indicative Communications Room
- Planning Drawing 18 – Indicative Cooler; and
- Planning Drawing 19 – Indicative Water Cooler Pump Skid.

2 THE DEVELOPMENT

2.1 Overview

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

The Development is designed to support the flexible operation of the National Grid and decarbonisation of electricity supply. The Development will store, import and export electricity but will not generate any additional electricity nor have any direct on-site emissions of CO₂.

2.2 Development Infrastructure

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

- 48 no. battery units (each 12.9 m x 2.44 m x 2.59 m) (Planning Drawing 14);
- 6 no. inverter units (each 6.1 m x 2.44 m x 2.59 m) (Planning Drawing 9);
- 1 no. 275kV AIS & Transformer (14.8 m x 5.05 m x 10.8 m) (Planning Drawing 15);
- 2 no. 2500kVA 690V Transformers (each 4.0 m x 4.0 m x 2.9 m) (Planning Drawing 5);
- 1 no 1000kVA 400v BoP Auxiliary Transformers (3.0 m x 3.0 m x 2.14 m) (Planning Drawing 6);
- 1 no. LV electrical houses (12.19 m 3.45 m x 2.59 m) (Planning Drawing 4);
- 2 no. synchronous compensator (22.07 m x 8.58 m x 10.0 m envelope) (Planning Drawing 16);
- 6 no. air blast coolers (each 8.87 m x 2.3 m x 2.5 m) (Planning Drawing 18);
- 2 no. water cooler pump skids (each 6.35 m x 2.3 m x 2.6 m) (Planning Drawing 19);
- 2 no. lube oil pump skids (each 2.15 m x 1.1 m x 1.1 m) (Planning Drawing 3);
- 1 no. MV electrical houses (12.19 m 3.45 m x 2.59 m) (Planning Drawing 4);
- 1 no. comms house (12.19 m x 2.44 m x 2.59 m) (Planning Drawing 17);
- 2 no. emergency back-up diesel generators (5.1 m x 2.07 m x 1.6 m) (Planning Drawing 7);
- 6 no. switchgear containers (each 12.2 m x 2.44 m x 3.0 m) (Planning Drawing 10);
- 5 no. security columns of 6 m in height with CCTV cameras located at various points around the site boundary (Planning Drawing 8);
- Internal roads;
- 4.0 m high noise attenuation fencing (Planning Drawing 11); and
- 3.4 m high palisade gate (Planning Drawing 13) and electric security palisade fencing (Planning Drawing 12).

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

2.3 Access

The Development will be accessed via Ayr Road. The location of the access point has been demonstrated to the Council throughout the pre-application process. During the operational phase of the development, it is anticipated that no more than five vehicles per week will visit the site, resulting in approximately 10 two-way vehicle movements per week.

2.4 Construction

The construction and installation of the Development will take approximately 13 months.

3 PLANNING HISTORY

3.1 Previous Applications

No historic planning applications exist within the Site boundary. Some previous applications cross the red line boundary; however, these relate to works on overhead power lines.

3.2 Pre-Application Advice

On 10th March 2021, Arcus submitted a Pre-Application Advice request to the Council for preliminary advice on the Development. Subsequently, a meeting was arranged between the Council, the Applicant and Arcus and was held virtually on 17th May 2021.

Ahead of this meeting, the Council provided detailed pre-application advice, via email, on 28th April 2021. The advice contained within the pre-application response and received during the meeting of 17th May 2021 has influenced the scope of the assessment provided in support of the Application.

3.3 EIA Criteria and Screening

Regulation 2 (1) of the Town and Country Planning (Environmental Impact Assessment) (Scotland) Regulations (2017)¹¹ ('the EIA Regulations') defines EIA development as either:

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

Greener Grid Park developments are not listed within Schedule 1 of the EIA Regulations. Within Schedule 2, a development area threshold in excess of 0.5 hectares is applied to Category 10 (a): "*Industrial estate development projects*", and Category 3 (a): "*Industrial installations for the production of electricity, steam and hot water (unless included in Schedule 1)*".

Given that the Site area exceeds this threshold, the requirement for an EIA is determined by considering the selection criteria detailed within Schedule 3 of the EIA regulations. The Selection Criteria in Schedule 3 includes an assessment of the following:

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

On 10th March 2021, a request for an EIA Screening Opinion was submitted to the Council (Reference: 21/0003/EIASC). A Screening Response was issued on 26th April 2021, confirming that following an assessment, the proposal is considered unlikely to result in significant environmental effects and therefore an EIA is not required for the development.

¹¹ Scottish Government (2017) the Town and Country Planning (EIA) (Scotland) Regulations 2017 [Online] Available at: <http://www.legislation.gov.uk/ssi/2017/102/contents/made> (Accessed 14/10/2021)

4 KEY LEGISLATION

4.1 Town and Country Planning (Scotland) Act 1997

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

*"Where, in making any determination under the Planning Acts, regard is to be had to the development plan, the determination is, unless material considerations indicate otherwise—
a) to be made in accordance with that plan."*

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

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

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

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

4.2 Climate Change Scotland Act 2009

The Climate Change (Scotland) Act 2009¹² (the 2009 Climate Change Act) creates a long-term framework for the current and successive administrations in Scotland to ensure a reduction in Scottish greenhouse gas emissions by 80% by 2050 with an interim milestone of 42% by 2020.

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

The Scottish Government introduced the new Climate Change (Emissions Reduction Targets) (Scotland) Bill (the Climate Change Bill) to Parliament on 23rd May 2018, and was passed on 25th September 2019, and received Royal Assent on 31st October 2019, becoming the Climate Change (Emissions Reduction Targets) (Scotland) Act 2019¹³ (the 2019 Climate Change Act).

The 2019 Climate Change Act amends the 2009 Climate Change Act and originally increased the 2050 target to 90%. In line with advice from the Committee on Climate Change (CCC) on 2nd May 2019, the Scottish Government amended the Climate Change Bill to set a target date of 2045 for reaching net-zero emissions¹⁴, as per the resultant 2019 Climate Change Act.

Setting a 'carbon neutral', net-zero target of 2045 is ambitious and ahead of the rest of the United Kingdom's target of 2050. While, the Government has set ambitious targets for reduction of carbon emissions these are not simply aspirational and work needs to be done at all levels of Government to achieve these targets. Renewable energy projects, such as the Development, play a key role in aiding the decarbonisation of the energy sector.

¹² Scottish Parliament (2009) *The Climate Change (Scotland) Act 2009* [Online] Available at: <http://www.legislation.gov.uk/asp/2009/12/contents> (Accessed 14/10/2021)

¹³ Scottish Parliament (2019) *Climate Change (Emissions Reduction Targets) (Scotland) Act 2019* [Online] Available at: <https://www.legislation.gov.uk/asp/2019/15/enacted> (Accessed 14/10/2021)

¹⁴ Scottish Government (2019) *Climate Change (Emissions Reduction Targets) (Scotland) Bill Marshallled List of Amendments for Stage 2* [Online] Available at [https://www.parliament.scot/S5_Bills/Climate%20Change%20\(Emissions%20Reduction%20Targets\)%20\(Scotland\)%20Bill/SP_Bill30MLS052019.pdf](https://www.parliament.scot/S5_Bills/Climate%20Change%20(Emissions%20Reduction%20Targets)%20(Scotland)%20Bill/SP_Bill30MLS052019.pdf) (Accessed 14/10/2021)

5 ENERGY POLICY: THE NEED TO ADDRESS CLIMATE CHANGE

This section of the Statement sets out the international, UK, and Scottish energy policy. It provides the framework of international agreement and binding targets upon which national energy policy is based. The international and national policy described and summarised below demonstrates the need for renewable energy from which the Development can draw a high level of support, due its value in stabilising the supply and demand of renewable energy sources.

All of these sections demonstrate the clear and consistent policy support at all levels for the supply of sustainable renewable energy. Renewable energy developments are dependent upon weather conditions and therefore, the energy management facilities and the sustainable storage of energy for the purpose of balancing supply and demand, is an integral component of a successful renewable energy industry. As such this Development should be viewed in the context of being supported by energy policy and legislation.

The Development would provide valuable infrastructure to help Scotland meet its renewable energy production targets, while supporting CO₂ reduction to combat climate change and increasing the security of supply of electricity.

5.1 International, European and UK Policy Context

5.1.1 COP 21 Paris Agreement

On 12 December 2015, 196 Parties to the UN Framework Convention on Climate Change (UNFCCC) adopted the Paris Agreement¹⁵, a legally-binding framework for an internationally coordinated effort to tackle climate change. The Paris Agreement's key aim is to strengthen the global response to climate change by keeping a global temperature rise this century below 2 degrees Celsius above pre-industrial levels and to pursue efforts to limit the temperature increase even further to 1.5 degrees Celsius¹⁶. The UK is legally bound through commitment to the Paris Agreement.

5.1.2 Committee on Climate Change Net Zero Report May 2019

In May 2019, the Committee on Climate Change published Net Zero – The UK's Contribution to Stopping Global Warming¹⁷. This report responds to a request from the Governments of the UK, Wales and Scotland, asking the Committee to reassess the UK's long-term emissions targets. The report recommends a new emissions target for the UK: net zero gases by 2050, and recommends a 2045 net-zero target for Scotland to reflect Scotland's greater relative capacity to remove emissions than the UK as a whole. The Report highlights the falling cost of key renewable technologies, which are now generally comparable or lower in cost than power from fossil fuels, whilst bringing significant co-benefits such as reduced air pollution.

5.1.3 The Climate Change Act 2008 (2050 Target Amendment) Order 2019

On 27 June 2019, the Climate Change Act 2008¹⁸ was amended to introduce a target for at least a 100% reduction in greenhouse gas emissions (compared to 1990 levels) in the

¹⁵ United Nations Climate Change - The Paris Agreement (2015) [Online] Available at: <https://unfccc.int/process-and-meetings/the-paris-agreement/the-paris-agreement> (Accessed 14/10/2021)

¹⁶ UNFCCC 2018 Paris Agreement Overview [online] Available at: <https://unfccc.int/process-and-meetings/the-paris-agreement/what-is-the-paris-agreement> (Accessed 14/10/2021)

¹⁷ Committee on Climate Change (2019) *Net Zero – The UKs contribution to stopping global warming* [Online] Available at: <https://www.theccc.org.uk/publication/net-zero-the-uks-contribution-to-stopping-global-warming/> (Accessed 14/10/2021)

¹⁸ UK Government (2008) *Climate Change Act 2008* [Online] Available at: <https://www.legislation.gov.uk/ukpga/2008/27/contents> (Accessed 14/10/2021)

UK¹⁹ by 2050. This 'net zero' target is likely to affect and increase future Government renewable and low carbon energy targets and create a more positive policy environment for renewable energy.

5.1.4 Progress in Reducing Emissions – 2021 Committee on Climate Change Progress Report to Parliament

The 2021 Committee on Climate Change (CCC) Progress Report to Parliament²⁰ was published in June 2021 and provides a review of Government efforts over the previous 12 months with regards to Climate Change. While UK emissions fell by 13% in 2020, much of this decline was likely a result of the Covid-19 pandemic and as such, lasting changes are far from certain. The CCC report recommends taking action to transition to a fully decarbonised electricity system. Furthermore, it sets a target to phase out gas-fired electricity generation in the UK by 2035, subject to ensuring security of supply.

There has been significant progress in the transition to renewables, with emissions from electricity having decreased by 65% from 2009 to 2019. However, the CCC report notes that generation shares from renewable resources will need to increase to support the transition to electric vehicles. The International Energy Agency has identified solar power as producing some of the cheapest electricity in history and forecasts that if there is a rapid built-out of renewables (particularly solar and wind), net zero emissions for the power sector can be achieved by 2035 in advanced economies.

5.1.5 The Sixth Carbon Budget: The UK's path to Net Zero

On 9 December 2020, the CCC released The Sixth Carbon Budget²¹ which updates intermediary targets for the UK's progress to net zero.

"Our recommended pathway requires a 78% reduction in UK territorial emissions between 1990 and 2035. In effect, it brings forward the UK's previous 80% target by nearly 15 years. There is no clearer indication of the increased ambition implied by the Net Zero target than this."

In establishing intermediary targets towards net zero, the context exists for Local Authorities to recognise the action that must be taken sooner rather than later. As concluded in the Sixth Carbon Budget:

"The implication of this path is clear: the utmost focus is required from government over the next ten years. If policy is not scaled up across every sector; if business is not encouraged to invest; if the people of the UK are not engaged in this challenge – the UK will not deliver Net Zero by 2050."

5.1.6 National Audit Office – Achieving Net Zero

Published on 2 December 2020, the National Audit Office report²² to the UK Government examines the main risks to achieving net zero effectively and efficiently. The report is forthright that most of the UK reductions in emissions has come about from the switch away from coal in electricity generation. Whilst reducing emissions further will require wider changes to the UK economy, further investment in renewable electricity generation will be required.

¹⁹ UK Government (2019) *The Climate Change Act 2008 (2050 Target Amendment) Order 2019* (2019 No. 1056) [Online] Available at: <http://www.legislation.gov.uk/uksi/2019/1056/made> (Accessed 14/10/2021)

²⁰ Committee on Climate Change (2021) *Progress in Reducing Emissions – 2021 Report to Parliament* [Online] Available at: <https://www.theccc.org.uk/publication/2021-progress-report-to-parliament/> (Accessed 14/10/2021)

²¹ The CCC (2020) *The Sixth Carbon Budget: The UK's path to Net Zero* [Online] Available at: <https://www.theccc.org.uk/wp-content/uploads/2020/12/The-Sixth-Carbon-Budget-The-UKs-path-to-Net-Zero.pdf> (Accessed 14/10/2021)

²² National Audit Office (2020) *Achieving Net Zero* [Online] Available at: <https://www.nao.org.uk/wp-content/uploads/2020/12/Achieving-net-zero.pdf> (Accessed 14/10/2021)

BEIS (The Department for Business, Energy and Industrial Strategy) projects that the UK will not meet its targets for emissions reduction unless action is taken to reduce the shortfall in achieving the targets set in the fourth and fifth carbon budgets. At paragraph 6 of the summary the report states that:

"Achieving net zero is a colossal challenge and significantly more challenging than the Government's previous target to reduce emissions by 80% by 2050."

At paragraph 13 of the Summary, the report confirms that BEIS will launch a net zero strategy prior to COP26 in November 2021. The strategy will set out the government's vision for transitioning to a net zero economy by 2050, encompassing all sectors that need to decarbonise, and closing the gap that currently exists in meeting the targets in the fourth and fifth carbon budgets. The strategy will set the level for the sixth carbon budget, review the cost of net zero and how it should be paid for and establishing meeting net zero as part of the wider economic response to Covid-19.

5.1.7 HM Government Energy White Paper – Powering our Net Zero Future December 2020

On 14 December 2020, Alok Sharma MO, then Secretary of State for Business, Energy and Industrial Strategy announced the launch of the Energy White Paper²³. The White Paper set out the UK Governments strategy to put net zero into practice and for fighting climate change, following the Prime Ministers Ten Point Plan for a Green Industrial Revolution²⁴.

The White Paper reiterates the compelling case to urgently address climate change and avert the dangerous consequences of that will arise if global temperatures increase is not kept at well below 2% as per the Paris Agreement, if possible, not above 1.5%. The White Paper sets out the measures that need to be put in place to achieve the carbon emission targets for the UK. These entail a major shift in energy use from fossil fuels to electricity and hydrogen. Clean electricity is to become the predominant form of energy, with a consequent doubling of demand. This transition must be secured whilst retaining reliability, resilience and affordability. Delivering this will require billions of pounds of investment in clean energy infrastructure.

5.1.8 Overall Climate Change and Energy Policy Conclusion

Given the overview of the relevant international policy on climate change and renewable energy, and the context of continued need for renewable energy development, it is clear that projects such as the Development would be encouraged due to their environmental, social and economic benefits.

If consented, the Development would work to maximise the potential of renewable energy generation developments and contribute to meeting the CO₂ emissions reduction targets.

The recently published Energy White Paper is both a stark reminder of the urgency with which climate change must be addressed at UK, European and International levels, but also the economic benefits which can flow from the transition to a low carbon economy. The Development is fully in accord with these objectives.

²³ HM Government (2020) *Energy White Paper – Powering our Net Zero Future* [Online] Available at: https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/943807/201214_BEIS_EWP_Command_Paper_LR.pdf (Accessed 14/10/2021)

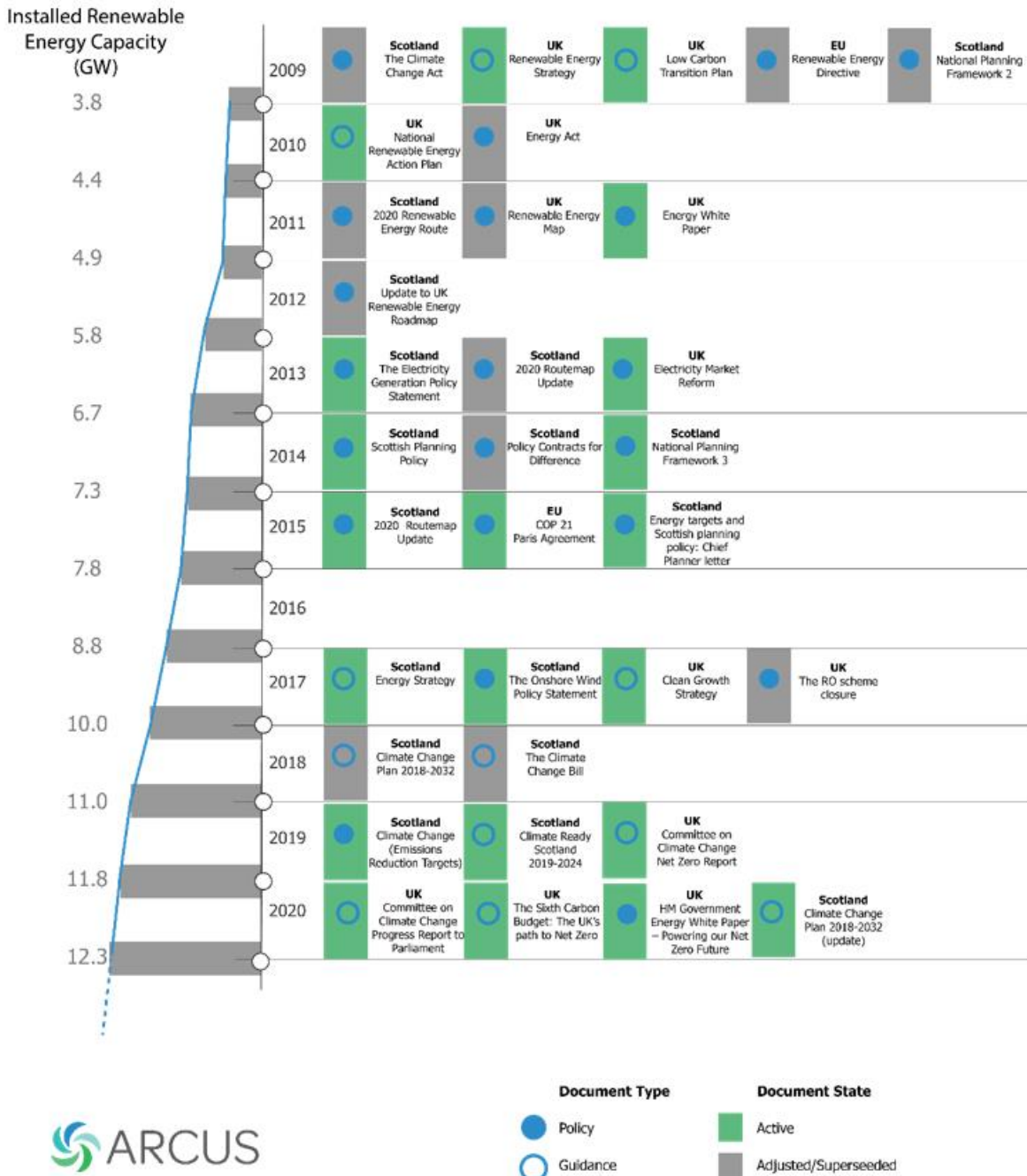
²⁴ *Prime Minister Boris Johnson outlines his Ten Point Plan for a Green Industrial Revolution for 250,000 jobs*. 18 November 2018 [Online] Available at <https://www.gov.uk/government/news/pm-outlines-his-ten-point-plan-for-a-green-industrial-revolution-for-250000-jobs> (Accessed 14/10/2021)

5.2 Scottish Climate Change and Energy Policy

Scotland is in a position of national climate emergency and action is required to combat the situation and achieve the target of net zero carbon emissions by 2045. There is a direct need to consent viable renewable energy developments in order to reach this goal.

The following Figure 5.1 shows the main legislative and policy developments between 2009 and at Scotland, UK and EU level and also the growth in Scotland’s renewable energy capacity. As this capacity grows, so does the requirement for facilities to balance and support the grid.

Figure 5.1: Main Legislative and Policy Developments



The following documents set out the Scottish Government’s commitment to cut carbon emissions through the deployment of renewable energy, and sets out the national energy strategy alongside with energy planning statistics.

As noted in Section 1.3 of this Statement, the need to balance the grid and increase the reliability of weather dependant energy sources is imperative to the successful transition towards carbon net-zero objectives.

5.2.1 Routemap for Renewable Energy in Scotland

Securing low carbon energy supplies is a key element in achieving the target of reducing emissions by 80% by 2050 with an interim milestone of 42% by 2020. In recognition of this the Scottish Government set targets which include producing 100% of the country's demand for electricity from renewable sources by 2020, first detailed within the 2020 Routemap for Renewable Energy in Scotland²⁵. Although now superseded, the Development therefore draws significant support as a contributor to these and successive targets.

5.2.2 Scottish Energy Strategy

The Scottish Energy Strategy 2017: The Future of Energy in Scotland²⁶ sets out the Scottish Government's vision for the future energy system in Scotland, to 2050. It articulates the priorities for an integrated system-wide approach that considers both the use and supply of energy for heat, power and transport. The Energy Strategy is designed to strengthen the development of local energy, protect and empower consumers, and support Scotland's climate change ambitions while tackling poor energy provision.

In March 2021, the Scottish Government published 'Scotland's Energy Strategy Position Statement'²⁷ (2021 SES) which builds on the 2017 SES. The 2021 SES notes an objective to:

"Introduce 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".

5.2.3 Low Carbon Scotland: Climate Change Plan – Third Report on Proposals and Policies 2018-2032²⁸

This document was published in September 2018 and provides an overview of the Scottish Government's Climate Change Plan 2018-2032. The document contains what at the time were the most up-to-date renewable electricity generation data available from Digest of UK Energy Statistics (DUKES). In the summary document²⁹, progress so far is addressed in the following terms:

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

²⁵ Scottish Government (2011) *2020 Routemap for Renewable Energy in Scotland – Update* [Online] Available at: <http://www.gov.scot/Resource/0048/00485407.pdf> (Accessed 14/10/2021)

²⁶ Scottish Government (2017) *Scottish Energy Strategy* [Online] Available at: <https://www.gov.scot/energystrategy> (Accessed 14/10/2021)

²⁷ Scottish Government (2021) *Scotland's Energy Strategy Position Statement* [Online] Available at: <https://www.gov.scot/publications/scotlands-energy-strategy-position-statement/> (Accessed 14/10/2021)

²⁸ Scottish Government (2018) *Climate Change Plan: Third Report on Proposals and Policies 2018-2032* [Online] Available at: <https://www.gov.scot/publications/scottish-governments-climate-change-plan-third-report-proposals-policies-2018/> (Accessed 14/10/2021)

²⁹ Scottish Government (2018) *Climate Change Plan: Third Report on Proposals and Policies 2018-2032 (RPP3) - Summary* [Online] Available at: <https://www.gov.scot/publications/scottish-governments-climate-change-plan-third-report-proposals-policies-2018-9781788516488/> (Accessed 14/10/2021)

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

The Development is in keeping with the Climate Change Plan, as it will contribute to the reduction of CO₂ emissions, and have positive effect on the local and national economy, whilst leaving a minimal footprint on the environment.

5.2.4 *A Fairer, Greener Scotland: Programme for Government 2021-2022*³⁰

In light of the climate emergency, announced in April 2019, Scotland has already committed to some of the toughest statutory emissions reductions in the world. Adopting a net zero emissions target by 2045 underlines the ambition that Scotland will no longer contribute to global climate change.

The 2021-22 Programme for Government maintains the national focus on the transition to net zero and the opportunity it creates. Even in the unusual circumstances of the COVID-19 pandemic, the 2021-22 Programme contains robust recommendations relating to achieving net zero and reducing CO₂ emissions including actively exploring "*opportunities for developing new and emerging net zero technologies and sectors*".

5.2.5 *Reducing emissions in Scotland – 2020 Progress Report to Parliament*³¹

The Climate Change Committee's 9th annual progress Report to the Scottish Parliament advises that Scotland's greenhouse gas emissions fell by 31% from 2008 to 2018. This was primarily due to action to reduce emissions in the power sector, where Scottish renewable electricity generation has tripled and fossil-fuelled generation has fallen by more than 70% in the last decade. However, greenhouse gas emissions increased by 2% in 2018, compared to a reduction of 3% in 2017.

The report identifies a number of clear priorities for the Scottish Government. Central to these are producing a new Climate Change Plan before the year end, creating the pathway to deliver Net Zero by 2045, and putting in place a UK Emissions Trading system. Amongst the more detailed recommendations is that the next National Planning Framework should be aligned closely with achieving Net Zero 2045 – providing a favourable planning framework to provide a low carbon and efficient energy system and climate resilient infrastructure.

5.2.6 *Update to the Climate Change Plan 2018 – 2032 – Securing a Green Recovery on a Path to Net Zero*

On 16th December 2020 the Scottish Government published a draft update to the 2018 Climate Change Plan³². The plan sets out the approach to delivering a green recovery, and a pathway to meeting world leading climate change targets for the period to 2032. By then, amongst other things Scotland's electricity system will be transformed, with over 100% of electricity demand being met from renewable sources.

³⁰ Scottish Government (2021) *A Fairer, Greener Scotland: Programme for Government 2021-2022* [Online] Available at: <https://www.gov.scot/publications/fairer-greener-scotland-programme-government-2021-22/documents/> (Accessed 14/10/2021)

³¹ Committee on Climate Change (2020) *Reducing emissions in Scotland Progress Report to Parliament* [Online] Available at: <https://www.theccc.org.uk/publication/reducing-emissions-in-scotland-2020-progress-report-to-parliament/> (Accessed 14/10/2021)

³² Scottish Government (2020) *Securing a green recovery on a path to net zero: climate change plan 2018–2032 – update* [Online] Available at: <https://www.gov.scot/publications/securing-green-recovery-path-net-zero-update-climate-change-plan-20182032/> (Accessed 14/10/2021)

There will have been a substantial increase in renewable generation, particularly through offshore and onshore wind capacity. As these are weather dependent energy sources, ensuring that the infrastructure is in place to store and distribute energy at a balanced rate and as is necessary, should be a priority.

Planning is a key delivery mechanism for many of the policies within the Climate Change Plan update, across all sectors. By making the right choices about where and what development should take place in the future, planning can help to reduce emissions whilst improving the wellbeing of communities and the quality and resilience of places across Scotland. Draft National Planning Framework 4 (NPF4) will be laid before Parliament in September 2021 with addressing climate change as a guiding principle for all plans and decisions.

5.2.7 *Scottish Climate Change and Energy Policy Conclusion*

Overall, the Development draws significant support from the national policy on energy and climate change. It has been designed in a way to minimise environmental effects whilst maintaining economic viability.

The Application has to be viewed in the context of national climate emergency and net-zero emissions targets. The Development serves a necessary purpose to maximise the capabilities of existing and forthcoming infrastructure in the transition to a more renewable energy supply.

As such, the Development accords with the national policy objectives for clean energy and climate change.

6 PLANNING POLICY

6.1 National Planning Framework 3 (NPF3)

On the 23rd of June 2014, the National Planning Framework 3 (NPF3)³³ was laid in the Scottish Parliament as required by statute alongside associated documentation. It is the Scottish Government's third NPF and spatial expression of the Government's Economic Strategy.

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

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

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

Greener Grid Parks support the flexible operation of decarbonisation through balancing electricity supply and demand disparities currently experienced by the National Grid. These are due to the existing and likely increased levels of renewable energy generation already approved within Scotland. This will build on the momentum generated by the extensive national and international energy, climate change and low carbon initiatives, as outlined in Section 5 of this Statement, and will benefit consumers, communities and businesses throughout the country.

6.2 Scottish Planning Policy (SPP)

SPP³⁴ is a non-statutory statement of Scottish Government policy on how nationally important land use planning matters should be addressed across the country. SPP sets out the Scottish Government's policy on land use planning and therefore should be afforded significant weight in the determination process for planning applications; however, paragraph (iii) of SPP acknowledges that *"it is for the decision-maker to determine the appropriate weight in each case"*.

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

SPP states in paragraph 93 that the planning system should:

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

³³ Scottish Government (2014) National Planning Framework 3 [Online] Available at: <https://www.gov.scot/publications/national-planning-framework-3/> (Accessed 14/10/2021)

³⁴ Scottish Government (2014) Scottish Planning Policy [Online] Available at: <https://www.gov.scot/publications/scottish-planning-policy/> (Accessed 14/10/2021)

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

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

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

SPP paragraph 154 states that the planning system should:

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

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

6.3 The Development Plan

As stated within Section 37(2) of the Planning Act 1997, the Development Plan is the primary consideration when determining planning applications, and forms the basis for the assessment of the Development in this Statement.

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

- The East Ayrshire Local Development Plan³⁵ ('EALDP'), adopted 2017; and
- The East Ayrshire Minerals Local Development Plan³⁶ (EAMLDP) adopted 2020.

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

- Green Infrastructure (December 2017)³⁷.

6.3.1 East Ayrshire Local Development Plan (2017)

6.3.1.1 Introduction

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

³⁵ East Ayrshire Council (2017) East Ayrshire Local Development Plan [Online] Available at: <https://www.east-ayrshire.gov.uk/PlanningAndTheEnvironment/Development-plans/LocalAndStatutoryDevelopmentPlans/East-Ayrshire-Local-Development-Plan-2017.aspx> (Accessed 14/10/2021)

³⁶ East Ayrshire Council (2020) East Ayrshire Minerals Local Development Plan 2020 [Online] Available at: <https://www.east-ayrshire.gov.uk/Resources/PDF/M/MLDP-Appendix-3-Peat-Excess-Soils-and-Sewage-Sludge.pdf> (Accesses 14/10/2021)

³⁷ East Ayrshire Council (2017) Green Infrastructure [Online] Available at: <https://www.east-ayrshire.gov.uk/Resources/PDF/P/Planning-SG-Green-Infrastructure-Open-Space-Complete.pdf> (Accessed 14/10/2021)

The EALDP was adopted by the Council in February 2017 and represents the settled view of the Council, setting out the development that East Ayrshire wants to see over the next 10-20 years.

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

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

The policies assessed within this section reflect the guidance provided by the Council in regards to policies considered relevant to the Development within the pre-application advice provided.

It is considered that the most significant policy within the EALDP for the determination of the Development, is Policy RE1: Renewable Energy Developments; and an assessment of the Development's compliance with this Policy is of significant importance when determining this Application.

The following brief summary of EALDP policies are a considered to be of relevance to the Application, however complete policy wording is not necessarily included. Fully worded policies can be found in the EALDP.

6.3.1.2 Overarching Policy OP1

This policy states that all development proposals will require to meet the following criteria in so far as they are relevant, or otherwise demonstrate how they contribute:

- (i) Comply with the provisions and principles of the EALDP vision and spatial strategy, all relevant LDP policies and associated supplementary guidance and non-statutory guidance;*
- (ii) Be fully compatible with surrounding established uses and have no unacceptable impacts on the environmental quality of the area;*
- (iii) Ensure that the size, scale, layout, and design enhances the character and amenity of the area and creates a clear sense of place;*
- (iv) Where possible, reuse vacant previously developed land in preference to greenfield land;*
- (v) Be of the highest quality design by meeting with the provisions of SPP, the Scottish Government's policy statement Designing Streets, the Council's Design Guidance and any master plan/design brief prepared for the site;*
- (vi) Prepare Master Plans/Design Statements in line with Planning Advice Notes 83 and 68 respectively where requested by the Council and/or where this is set out as a requirement in Volume 2 of the EALDP;*
- (vii) Be compatible with, and where possible implement, projects shown on the EALDP placemaking maps;*
- (viii) Ensure that there is no unacceptable loss of safeguarded areas of open space/green infrastructure and prime quality agricultural land;*
- (ix) Protect and enhance natural and built heritage designations and link to and integrate with green infrastructure where possible;*
- (x) Ensure that there are no unacceptable impacts on the landscape character or tourism offer of the area;*

- (xi) *Meet with the requirements of all relevant service providers and the Ayrshire Roads Alliance; and*
- (xii) *Be accessible to all.*

In determining the Development's compliance with Overarching Policy OP1, there are certain criteria that are more relevant than others. This is reinforced by the Council's accompanying text in relation to Overarching Policy OP1 in the pre-application advice response to this Development, stating:

"This policy is relevant to all development proposals and includes criteria such as new development must comply with the provisions of the LDP vision and spatial strategy, all relevant LDP policies and associated supplementary guidance and non-statutory guidance. OP1 criteria also require new development be fully compatible with surrounding established uses and have no unacceptable impacts on the environmental quality of the area, protect and enhance natural and built heritage designations, ensure there is no loss of safeguarded areas of open space and prime agricultural land, and ensure there are no unacceptable impacts on the landscape character and tourism offer of the area amongst others."

In being of a nature that supports the renewable energy industry, it is evident that the EALDP provides an in-principle support to development of this type, subject to its compliance with other policies and acceptable level of impact.

The surrounding rural nature of the area, notwithstanding presence of the Coylton substation, has influenced the siting, layout and design of the Development. The Development will fit into the characteristic of the surrounding area and minimise the need for lengthy transmission cables in order to provide the important infrastructure associated with the Development for the purpose of supporting renewable energy.

As per the Scottish Government agricultural soils map³⁸, the Site falls within Class 4.1 and is therefore not prime agricultural land.

The Site does not fall within the land designated under any of the placemaking maps, therefore criteria (vii) does not apply.

The nature of the Development precludes it from being accessible to all, as it is electrical and industrial. For health and safety reasons, public accessibility is not a relevant factor in determining policy compliance.

In line with the Council's pre-application advice, this Application is accompanied by assessments of natural and built heritage and landscape impacts. It is concluded therein that the impacts associated with the Development would be acceptable.

For all other relevant criteria under Overarching Policy OP1, this Statement relies on the accompanying technical assessments which determine that the Development is acceptable in regards to its impact upon natural and built heritage, landscape and roads. As such the Development fully complies with all relevant criteria in Overarching Policy OP1.

6.3.1.3 Policy IND 3: Business and Industrial Development in the Rural Area

Policy IND 3 states:

"Outwith settlement boundaries, new business, industrial and commercial development, will be encouraged and supported by the Council only where the proposal relates to one or more of the following types of development:

³⁸ Scottish Government (2021) *Scotland's Soils* [Online] Available at: https://map.environment.gov.scot/Soil_maps/ (Accessed 14/10/2021)

- (i) Identified Business and Industrial sites and Miscellaneous Sites, with the potential for business and industrial development as indicated on the Local Development Plan Maps;*
- (ii) Developments relating to and supporting the traditional rural activities of agriculture and forestry where there is a demonstrated site specific locational need;*
- (iii) Sensitive developments relating to recreational, tourism, leisure and sporting sectors;*
- (iv) Rail freight based industrial uses at existing coal disposal points or coal loading facilities within existing and/or former surface coal mines served by rail;*
- (v) Sympathetic farm diversification developments, supported by a 5 year business plan;*
- (vi) Small scale business developments which operate entirely from rural residential properties or community based facilities;*
- (vii) Renewable energy developments within the Rural Area that have been subject to detailed consideration against identified policy criteria."*

The criteria defined under Policy IND 3 with relevance to the determination of the Application is criteria (vii) pertaining to renewable energy developments.

As defined throughout this Statement, the proposed usage on the Site helps to balance the supply and demand of the energy grid and stabilise the fluctuating nature of energy generation from renewable sources.

There is therefore clear, in-principle support under Policy IND 3 for developments of this nature, subject to detailed consideration against other EALDP policies. As such, in determining compliance with other relevant policies, the Development complies with Policy IND 3.

6.3.1.4 Policy RE1: Renewable Energy Developments

Policy RE1 states:

"Proposals for the generation and utilisation of renewable energy in the form of new build development, infrastructure will be supported in standalone locations and as integral parts of new and existing developments where it can be demonstrated that there will be no unacceptable significant adverse impacts on all of the relevant Renewable Energy Assessment Criteria set out in Schedule 1 of the EALDP, that the scale of the proposal and its relationship with the surrounding area are appropriate and that all relevant policies are met."

The Schedule 1 criteria mirror those matters listed in paragraph 169 of SPP. In determining the relevant criteria under Schedule 1, this Statement relies on the appropriate guidance provided by the Council in its pre-application advice:

"Under Schedule 1, development proposals would require to be acceptable when assessed against a range of criteria. Specific to this proposal, it should be noted that the proposed site is located within Landscape Character Type (LCT) 66 Agricultural Lowlands – Ayrshire as defined by NatureScot. The proposed site does not contain any ancient woodlands, tree preservation orders or Class 1 peat, although a waterbody does run through the northern half of the application site and effects on hydrology will require to be fully assessed and detailed within any subsequent planning application. The Applicant is also advised to contact the Council's Environmental Health Service to ascertain whether there are any Private Water Supplies (PWS) in the vicinity of the site which could be affected by the proposed development. Such consideration will need to ensure that the source and

pathway to receptor are taken into account and mapped as evidence should such PWS or sources/pathways be found to be at risk of impact as a result of the proposed development.

There are no nearby Natura 2000 sites and cultural and heritage assets are some distance from the proposed application site (nearest being a B-listed building approximately 1.4km to the west) so impacts on such features are unlikely, though this can be confirmed through any detailed supporting documents submitted with the application.

There are a number of individual farms and dwellinghouses throughout the wider area and impacts on such properties, through visual and or light impacts, noise, dust or traffic impacts will need to be assessed and any necessary mitigation detailed. More distant settlements which may experience increased disruption through traffic impacts during any construction or ongoing operational phase of the development will also need to be assessed. Traffic impacts more generally will need to be assessed and details of the volume of anticipated traffic during the construction and operational periods of the development will need to be reported and any mitigation necessary for trunk roads and other roads will need to be detailed. A construction delivery route shall be shown, highlighting the likely construction traffic route to the site and details of anticipated volume of material to be imported to the site for construction, along with details of their anticipated source.

Impacts on other service operators in the area, particularly Scottish Power who operate the existing Coylton substation next to which the application site is proposed, will need to be assessed. Any economic impacts associated with the proposed development should be detailed within any subsequent application. These are some of the key considerations which the Applicant will need to consider, amongst others, which will require to be judged as acceptable when assessed against the relevant Schedule 1 criteria and other relevant LDP policies."

It is evident under Policy RE1, that in-principle the Council supports developments that further the use of renewable energy. As noted throughout this Statement, the purpose of the Development is to ensure the successful management and distribution of energy sourced from renewable means. As such, the Council's support for the Development is established through this Policy, subject to no unacceptable significant adverse impacts on the relevant criteria.

The Applicant and Arcus have produced a suite of technical documents based on the advice received throughout the pre-application and EIA screening process, in order to provide a comprehensive assessment of the Development in-line with the relevant Schedule 1 criteria. This Statement relies on the evidence provided in the following, accompanying assessments in reaching a determination of no unacceptable significant adverse impacts:

- Landscape and Visual Appraisal;
- Drainage Impact Assessment;
- Preliminary Ecological Appraisal;
- Noise Impact Assessment; and
- Heritage Statement.

Each of these assessments accompanying the Application have determined that there will be no unacceptable significant adverse impacts as a result of the Development. As such, the Development complies with Policy RE1.

6.3.1.5 Policy T1: Transportation requirements for new development

Policy T1 states that:

"The Council will require developers to ensure that their proposals meet with all the requisite standards of the Ayrshire Roads Alliance and align with the Regional and Local

Transport Strategies. Developments which do not meet these standards will not be considered acceptable and will not receive Council support."

Aspects of Policy T1 relate to the promotion of active travel and integration with footpaths, cycle routes and public transportation links. Due to the nature and type of the Development, this is not considered to be a relevant or appropriate factor in the assessment of policy compliance. The Development should not be accessible to the public for health and safety reasons and shall not be staffed on a daily basis, with servicing requiring specific equipment, not necessarily suitable for public transport access.

As operational traffic will not have any significant impact on roads standards and capacity, it is considered that it is appropriate to consider only construction traffic generated. Due to the small size of the Development (under 2 hectares), construction traffic is expected to be managed on the existing roads network.

The Applicant considers that the preparation of a Construction Traffic Management Plan ('CTMP') will be necessary to ensure the movement of vehicles through the construction phase of the Development. The preparation of a CTMP and its approval by the Council can be enforced via suitably-worded planning condition.

As such, at this stage the Development complies with the relevant criteria of Policy T1.

6.3.1.6 Policy T2: Transport Requirements for New Significant Traffic Generating Uses

Policy T2 states that the Council will not support new significant travel generating uses at locations which would increase reliance on cars and under a list of other criteria.

This was considered to be a determinative policy by the Council in its pre-application response, and as such, is addressed in this Statement; however, it is noted that the Development would not generate significant traffic as a result of its use. The Development will be predominantly unmanned on a daily basis post-construction. The only access will be by routine maintenance vehicles. As such, the Development complies with Policy T2.

6.3.1.7 Policy ENV1: Listed Buildings.

This policy states that the Council will support:

- The retention and preservation of all listed buildings and buildings within conservation areas;
- The adaption and re-use of listed buildings and buildings within conservation areas to meet modern requirements, where this can be achieved in a manner sensitive to the character of the building.

Proposals for the total or partial demolition of a listed building will only be supported where it can be evidenced that:

- The building is not of special interest; or
- The building is incapable of repair;
- The demolition of the building is essential to delivering significant benefits to economic growth or the wider community; or
- The repair of the building is not economically viable and that it has been marketed at a price reflecting its location and condition to potential purchasers for a reasonable period.

There are no listed buildings present on the Site. The Application is accompanied by an Archaeological Assessment that determined the impact of the Development to be not significant. As such, the Development fully complies with Policy ENV1.

6.3.1.8 Policy ENV2: Scheduled Monuments and Archaeological Resources.

Policy ENV2 states that:

"Development that would have an adverse effect on Scheduled Monuments or on their settings shall not be supported unless there are exceptional overriding circumstances."

This Statement relies on the evidence provided in the accompanying Archaeological Assessment in determining the Development's compliance with Policy ENV2. The Archaeological Assessment states:

"The accompanying Heritage Statement has concluded that no scheduled monuments, nor their settings, would be adversely affected as a result of the Development."

It is therefore evident that the Development complies with Policy ENV2.

6.3.1.9 Policy ENV3: Conservation Areas

Policy ENV3 states that:

"Development or demolition within a conservation area or affecting its setting, shall preserve and enhance its character and be consistent with any relevant conservation area appraisal or management plan. Any development should be sympathetic to the area in terms of its layout, size, scale, design, siting, material and colour and should seek to enhance the architectural and historic qualities of the area."

The Development is not located within a conservation area. The nearest conservation area within East Ayrshire is the Ochiltree Conservation Area³⁹, located approximately 4 km east of the Site. There is no perceived impact on the character of this or any other conservation area as a result of the Development.

The accompanying Heritage Statement has concluded that no conservation areas, nor their settings, would be adversely affected as a result of the Development.

It is therefore evident that the Development complies with Policy ENV3.

6.3.1.10 Policy ENV6: Nature Conservation.

Policy ENV6 states that the importance of nature conservation and biodiversity will be fully recognised in the assessment of development proposals, ensuring that:

- *"Any development likely to have a significant effect on a Natura 2000 site which is not directly connected with or necessary to its conservation management must be subject to a "Habitats Regulations Appraisal". Such development will only be approved if the appraisal shows that there will be no adverse effect on the integrity of the site;*
- *Any development affecting a SSSI will only be permitted where it will not adversely affect the integrity of the area or the qualities for which it has been designated or where any significant adverse effects on the qualities for which it is designated are clearly outweighed by social, environmental or economic benefits of national importance;*
- *Any development that may adversely impact on areas of local importance for nature conservation, including provisional wildlife sites, local geodiversity sites and local nature reserves, will be expected to demonstrate how any impact can be avoided or mitigated;*
- *If there is evidence that protected species may be affected by a development, steps must be taken to establish their presence. The planning and design of any development which has the potential to impact on a protected species will require to take into account the level of protection afforded by legislation and any impacts must be fully considered prior to the submission of any planning application; and*

³⁹ East Ayrshire Council (2016) *Online Mapping* [Online] Available at: <http://webgis.east-ayrshire.gov.uk/webgis2016/> (Accessed 14/10/2021)

- *Any new development must protect, and where appropriate incorporate and/or extend, existing habitat networks, helping to further develop the Central Scotland Green Network in Ayrshire."*

The Development was screened as unlikely to have significant environmental impact. Due to the size of the Site and the surrounding land uses, there would be no direct or significant indirect effects on the setting of any site, the integrity of any designation or the continued use of any habitat.

In determining the Development's impact upon sites of importance for nature conservation or biodiversity, this Statement relies on the conclusions of the accompanying Preliminary Ecological Assessment ('PEA'), which concludes that the only designated site within the study area is the Barlosh Moss SSSI, stating:

"Barlosh Moss SSSI is designated for its hydromorphological mire range and raised bog habitat and therefore is not discussed further in this report.

As no designated sites will be impacted by the development, no recommendations are required."

With regards to species and habitats, the PEA concludes:

"Due to the low ecological value of the Site, and lack of evidence of protected species, no further surveys are recommended; however, recommendations, mitigation and enhancement have been proposed"

Based on the evidence provided and mitigation proposed in the accompanying PEA, the Development fully complies with Policy ENV6.

6.3.1.11 Policy ENV7: Wild Land and Sensitive Landscape Areas

Policy ENV6 states that:

"Areas of wild land, as identified on the 2014 SNH map of wild land areas, have little or no scope to accommodate new development and are safeguarded on the LDP maps. Any development proposed must be able to demonstrate that any adverse effects on the qualities of wild land can be sustainably overcome by siting, design or other mitigation.

The Council will give priority and prime consideration to the protection and enhancement of the landscape in its consideration of development proposals within the Sensitive Landscape Areas identified on the LDP maps.

Any development deemed to have unacceptable impacts on wild land and SLAs will not be supported by the Council. All development proposals within these areas will also require to be assessed against policy ENV 8: Protecting and Enhancing the Landscape."

As per the cited SNH maps⁴⁰, the Site is not located within an area of wild land. As per the EALDP Rural Area Map, the Site is not located within a Sensitive Landscape Area⁴¹. The Development therefore complies with Policy ENV7.

6.3.1.12 Policy ENV8: Protecting and Enhancing the Landscape.

Policy ENV8 states that:

"The protection and enhancement of East Ayrshire's landscape character as identified in the Ayrshire Landscape Character Assessment will be a key consideration in assessing the appropriateness of development proposals in the rural area. The Council will require that:

⁴⁰ NatureScot (2014) *Wild Land Areas map and descriptions 2014* [Online] Available at: <https://www.nature.scot/doc/wild-land-areas-map-and-descriptions-2014> (Accessed 14/10/2021)

⁴¹ East Ayrshire Council (2017) *East Ayrshire Local Development Plan Rural Area Map* [Online] Available at: <https://www.east-ayrshire.gov.uk/Resources/PDF/E/EALPD-Rural-Area-Map.pdf> (Accessed 14/10/2021)

- *Development proposals are sited and designed to respect the nature and landscape character of the area and to minimise visual impact. Particular attention will be paid to size, scale, layout, materials, design, finish and colour;*
- *Where visual impacts are unavoidable, development proposals should include adequate mitigation measures to minimise such impacts on the landscape;*
- *Particular features that contribute to the value, quality and character of the landscape are conserved and enhanced. Development that would result in the loss of valuable landscape features, to such an extent that character and value of the landscape, are unacceptably diminished, will not be supported. Such landscape features include:*
 - *Settings of settlements and buildings within the landscape;*
 - *Skylines, distinctive landform features, landmark hills and prominent views;*
 - *Woodlands, hedgerows and trees;*
 - *Field patterns and means of enclosure, including dry stone dykes; and*
 - *Rights of way and footpaths."*

This Statement is accompanied by a Landscape and Visual Assessment. The purpose of this LVA is to provide a comprehensive evaluation of the Development in relation to its impact on landscape receptors and setting. In determining the level of impact from the Development and the overall compliance with Policy ENV8, this Statement relies on the evidence contained within the LVA, which concludes that:

"The Development would not exceed the capacity of the Lowland farmland landscape, nor would it become the dominant characteristic of the landscape. Development is relative to the scale and character of the receiving landscape, and the demonstrated capacity of the landscape to accommodate development alongside the operational Coylton Substation."

There is embedded landscape mitigation built into the Development through the following planting:

- 0.26 km of native species hedgerow with 25 hedgerow trees informally spaced along the eastern and western boundaries;
- An area of 0.42 ha of native woodland shelter belt planting which would include a mix of the lower growing species and some taller tree species; and
- An area of 0.67 ha of native grass and wildflower mix beneath the hedgerows and along verges within the Site.

The LVA takes account of landscape character types, key viewpoints and receptors to determine the level of effect in line with best practice and guidance. The assessment contained therein is reflective of the nature of the Development and the context of the surrounding area.

The Development is of a low-level industrial nature, which is in-keeping with the context of the Coylton Substation. Details of the component plant and machinery is found in Section 2 of this Statement and in the accompanying Planning Figures. Design details in regards to colour and finish will be done with the intention of minimising visual impact and ensuring minimal visual intrusion.

In acknowledging the determination within the LVA, it is evident that the Development complies with Policy ENV8.

6.3.1.13 Policy ENV10: Carbon Rich Soils.

Policy ENV10 states:

"In recognition of the role of peatland soils as valuable carbon stores or "sinks", the Council will seek to minimise adverse impacts from development on such soils, including by the release of CO₂ to the atmosphere. The Council will support and promote the restoration of

peatland habitats, where there is potential for such habitats to become active carbon stores and help to reduce net carbon emissions.

However, development may be permitted for renewable energy generating developments on carbon rich soils where it can be demonstrated (in accordance with the Scottish Government's 'carbon calculator' or other equivalent evidence) that the balance of advantage in terms of climate change mitigation lies with the energy generation proposal, and that any significant effects on these areas can be substantially overcome by siting, design or other mitigation."

The Site does not fall within Class 1 or 2 areas of carbon rich soil, deep peat or priority peatland⁴². As such, the requirements of this policy should not be enforced upon the Development, even though there is an in-principle support under this policy for renewable energy developments.

As the Development would have no adverse impact on carbon rich soil, deep peat or priority peatland, it is in full accordance with Policy ENV10.

6.3.1.14 Policy ENV12: Water, Air, Light and Noise Pollution.

Policy ENV12 refers to water, air, light and noise pollution. Due to the nature of the Development as unmanned there is no significant traffic generation post-construction and there are no technologies present on Site that would lead to significant adverse air pollution.

With no staff present on Site on a daily basis, the only light would come from intermittently used security lighting, which would be motion sensed. As such, this is not considered to be a determinative factor in the assessment of compliance with Policy ENV12.

The relevant criteria under this policy relates to water and noise pollution. With regards to these considerations, Policy ENV12 states:

"Water

In line with the Water Framework Directive, the Council will give priority to maintaining and improving the quality of all water bodies and ground water. There will be a presumption against any development that will have an adverse impact on the water environment in terms of pollution levels and the ecological value of water habitats.

Where developments are proposed on or close to existing water bodies, design solutions should explore how best to maintain their water quality and, where possible improve the water bodies through maintaining them as wildlife corridors where biodiversity can be improved. Maintenance access buffer strips of a minimum 6 metres in width should be provided between the development and the adjacent watercourse.

The Council will not be supportive of developments which will, or which have the potential to, cause significant adverse impacts on water bodies as a result of morphological changes to water bodies such as engineering activities in the form of culverts or changes to the banks or bed.

Development will be required to connect to the public sewerage system, where possible, and manage surface water through sustainable drainage systems (SuDS)."; and

"Noise

All new development must take full account of any Noise Action Plan and Noise Management Areas that are in operation in the area and ensure that significant adverse noise impacts on surrounding properties and uses are avoided. A noise impact assessment

⁴² East Ayrshire Council (2020) *East Ayrshire Minerals Local Development Plan 2020: Non Statutory Guidance: Peat, Excess Soils and Sewage Sludge* [Online] Available at: <https://www.east-ayrshire.gov.uk/Resources/PDF/M/MLDP-Appendix-3-Peat-Excess-Soils-and-Sewage-Sludge.pdf> (Accessed 14/10/2021)

may be required in this regard and noise mitigation measures may be required through planning conditions and/or Section 75 Obligations."

In this regard, this Statement relies on the information present within the accompanying Drainage Impact Assessment, which concludes the following, in relation to the placement of the attenuation pond:

"The pond is located at lower elevations that the Development and any exceedance flows will disperse away from the Development in accordance with topography and no exceedance flows will impact the Development.

The pond is not located within close proximity to residential or commercial property and will not impact surrounding development during any exceedance event."

In line with the requirements of Policy ENV12, the watercourse divergence will be conducted in accordance with SEPA guidance and the SEPA Controlled Activities Regulations. This will ensure that the water strategy is the highest design standard with assesses the impact associated with diverting the watercourse as acceptable.

The Application is accompanied by a Noise Impact Assessment ('NIA'), which determines that:

"An assessment of noise impact has been undertaken in accordance with BS 4142 criteria as agreed with the Environmental Health Officer. It has been found that the Rating levels due to the operation of the Development do not exceed 5 dB above background levels, and as such are compliant with the agreed assessment criteria at the nearest, and therefore all receptors.

As such, provided the mitigation measures in Section 7.3 (of the NIA) are incorporated, the Development is considered to be acceptable in terms of noise."

It is therefore considered that the Development fully complies with the relevant criteria under Policy ENV12.

6.3.1.15 Policy ENV14: Low and Zero Carbon Buildings

Policy ENV14 states:

"In order to meet with the requirements of Section 3F of the Town and Country Planning (Scotland) Act 1997 (as amended), development proposals will be required to incorporate low and zero carbon generating technologies to reduce greenhouse gas emissions. Proposals for all new buildings will require to demonstrate that at least 10% of the carbon emissions reduction standard set by the Scottish Building Standards (2010) will be met through the installation and operation of zero carbon generating technologies. This percentage will increase to 15% from the beginning of 2019 and will be reviewed in 2021."

The nature of the Development as energy storage and grid stabilising technology are ancillary to the renewables industry, demonstrating that it functions within the overall objectives of low and zero carbon generating technologies. Therefore, the Development complies with the objectives of Policy ENV14.

6.3.2 **Supplementary Guidance: Green Infrastructure**

The Supplementary Guidance: Green Infrastructure ('SGGI') is a statutorily adopted document of material consideration in the determination of the Application.

Whilst the small size and nature of the Development preclude access to on-Site interactive green infrastructure, the Application is supported by a Landscape Planting Plan, which demonstrates the Applicant's commitment to enhancing the green environment.

6.3.3 *East Ayrshire Minerals Local Development Plan*

The Site does not fall within any designated areas of protection or areas of peat and carbon rich soils, as defined on Map 1 of the EAMLDP. The Site does not involve the removal of soils from the site or relate to any sewage works. As such, there are no determinative policies within the EAMLDP, against which the Development should be assessed.

6.3.4 *Summary*

As demonstrated above, the Development is compliant with EALDP Policies OP1, IND3, RE1, T1, T2, ENV1, ENV2, ENV3, ENV6, ENV7, ENV8, ENV10, ENV12, ENV14.

The Development can draw considerable support from the in-principle support for renewable and low carbon developments under Policy RE1, and the highlighted context of energy and decarbonisation objectives shown in Section 5 of this Statement.

7 RELEVANT MATERIAL CONSIDERATIONS

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

7.1 Energy Storage and Management Drivers

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

Developments to manage supply and demand of grid services will play an important role in achieving this. A report by the National Infrastructure Commission (2016)⁴³ estimates that smart power systems in the UK, which include energy storage and management "*could save consumers up to £8 billion a year by 2030, help the UK meet its 2050 carbon targets and secure the UK's energy supply for generations.*"

The Development is designed to support the flexible operation of the National Grid and decarbonisation of electricity supply. The Development will import and export electricity however, will not generate any additional electricity nor have any on-site emissions of CO₂. As such, the Development will contribute to the legal obligations of the Climate Change Act 2008, as amended in 2019 to incorporate the 2050 Net Zero target.

As noted in Section 1.3 of this Report, there is an assessed need for the UK to contribute 15 and 30 GW of new storage by 2050.

7.2 Climate Emergency

East Ayrshire Council declared a climate emergency in September 2019. The Council has made a commitment to reduce carbon emissions and stop catastrophic climate change.

7.3 Community Renewable Energy Project

The Ayrshire Grown Deal funds the Community Renewable Energy (CoRE) project⁴⁴. Whilst the Development does not form part of the CoRE allocated development projects in East Ayrshire, it operates under the same principles of pioneering and transforming energy production and distribution.

The Development would exist and operate harmoniously within the wider regional energy strategy supported by CoRE. Locating innovative technologies at the Site is beneficial for East Ayrshire to support, as it shows a wider strategic commitment to decarbonisation and innovative energy distribution.

7.4 UK Renewable Energy Roadmap

The UK Renewable Energy Roadmap (2011)⁴⁵ ('the Roadmap') set out the UK Government's commitment to increasing the use of renewable energy up to 2020. The Roadmap identified the National Policy Statements as a potential means of improving the delivery of renewable

⁴³ UK Government (2016) Smart Power: A National Infrastructure Commission Report [Online] Available at: https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/505218/IC_Energy_Report_web.pdf (Accessed 14/10/2021)

⁴⁴ East Ayrshire Council (2021) *Community Renewable Energy Project* [Online] Available at: <https://www.east-ayrshire.gov.uk/PlanningAndTheEnvironment/RegenerationAndTownCentreManagement/Community-Renewable-Energy/Core.aspx> (Accessed 14/10/2021)

⁴⁵ Department of Energy and Climate Change (2011) *The UK Renewable Energy Roadmap* [Online] Available at: https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/48128/2167-uk-renewable-energy-roadmap.pdf (Accessed 14/10/2021)

energy development through their advice on need, mitigation and delivery in a sustainable manner.

The UK Renewable Energy Roadmap Update (2013)⁴⁶ ('the Roadmap Update') reports on the progress that has been made in the renewable energy sector since the publication of the Roadmap. The Roadmap Update re-iterates Central Government's commitment to renewable energy (Paragraph 1):

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

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

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

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

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

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

On 27 June 2019, the Climate Change Act 2008 was amended to introduce a target for at least a 100% reduction in greenhouse gas emissions (compared to 1990 levels) in the UK⁴⁷ by 2050. This 'net zero' target is likely to affect and increase future Government renewable and low carbon energy targets and create a more positive policy environment for energy storage and management development.

7.6 Socio-Economic Benefit

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

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

⁴⁶ Department for Energy and Climate Change (2013) *UK Renewable Energy Roadmap Update 2013* [Online] Available at: https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/255182/UK_Renewable_Energy_Roadmap_-_5_November_-_FINAL_DOCUMENT_FOR_PUBLICATION_.pdf (Accessed 14/10/2021)

⁴⁷ UK Government (2019) *The Climate Change Act 2008 (2050 Target Amendment) Order 2019* (2019 No. 1056) [Online] Available at: <http://www.legislation.gov.uk/uksi/2019/1056/made> (Accessed 14/10/2021)

7.7 Emerging Planning Policy

7.7.1 NPF4

The Scottish Government have started work to prepare NPF4, which will replace NPF3 and incorporate SPP. It is anticipated that NPF4 will be produced with a focus on green energy and will “*provide a spatial planning response to the Global climate emergency*”⁴⁸. This is indicative of the growing national investment in renewable energy, which must filter through to local level and consent suitable and sustainable renewable energy developments such as this one.

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

7.8 Summary

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

⁴⁸ The Scottish Government (2019) Planning and Architecture Blog: National Planning Framework 4 – The Essentials! [Online] Available at: <https://blogs.gov.scot/planning-architecture/2019/10/08/national-planning-framework-4-the-essentials/> (Accessed 14/10/2021)

8 CONCLUSION

This statement has been prepared in order to accompany an application made under the Town and Country Planning (Scotland) Act 1997, as amended, for the development of the Coylton Greener Grid Park, located on land off Ayr Road, East Ayrshire.

In accordance with the Planning Act, the Development should be determined in accordance with the Development Plan unless material considerations indicate otherwise. This Statement demonstrates that the Development complies with the relevant policies of the EALDP. There is clear in-principle support for both the nature and location of the Development within the adopted EALDP. The location of the Development close to the existing Coylton substation allows for a straightforward connection to the grid when required and will avoid any significant infrastructure works that could directly affect the surrounding the environment. The application is supported by a comprehensive and necessary suite of technical and environmental documents, demonstrating that there would be no unacceptable adverse impacts as a result of the Development.

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

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

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

- The Development complies with Development Plan and can draw support from material considerations;
- The Development is designed to support the flexible operation of the National Grid and decarbonisation of electricity supply in support of EU targets and national planning policy;
- The Development is located in close proximity to Coylton substation which will avoid the need for lengthy transmission cables, ensure efficient connection to the National Grid and minimising disturbance to the community;
- The technical information, provided in the appendices to this Statement, was done so with consultation with the Council;
- The Development Site is not sensitive in regards to environmental considerations such as; cultural heritage, noise, air, hydrology and flood risk and ecology;
- A palisade and electric security fence provides security for the Development;
- As a new, innovative technology, the Development will diversify the economic mix in East Ayrshire;
- As the existing road network was capable of accommodating the larger infrastructure of the neighbouring substation, it is anticipated that the Development construction traffic will not create any significant effects nor require major upgrades; and
- As agreed with the Council, appropriate environmental reports have been produced.

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