

Report To: The Planning Board

Date: 5 June 2024

Report By: Director, Environment and Regeneration

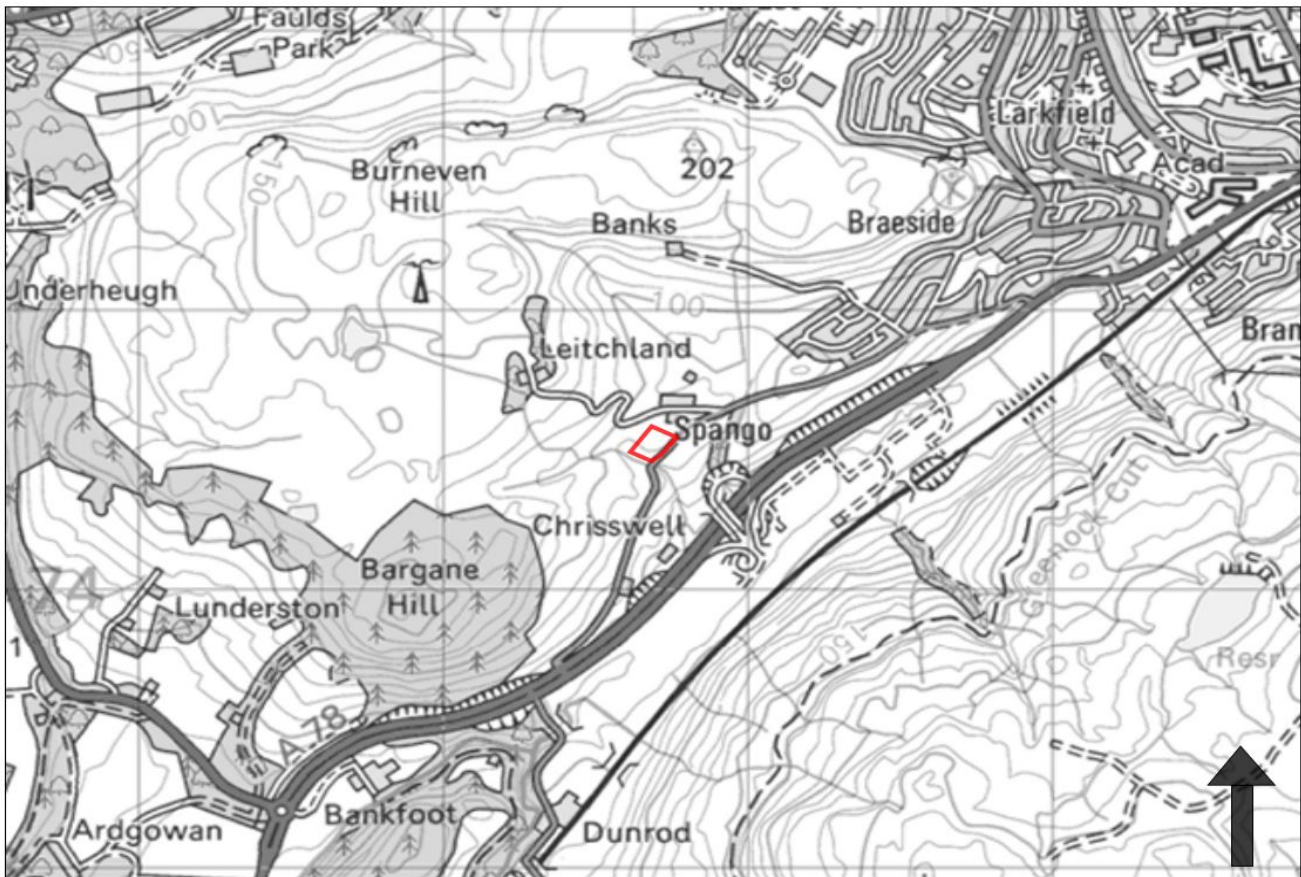
Report No: 23/0205/IC

Major Application Development

Contact Officer: Colin Lamond

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Subject: Multiple containerised battery storage units with associated infrastructure, access, control building, switch room, inverter containers, lighting and associated works at Flatterton Farm, Flatterton Road, Greenock



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SUMMARY

- The proposal complies with National Planning Framework 4, the adopted 2019 Inverclyde Local Development Plan and the proposed 2021 Inverclyde Local Development Plan.

- There have been 8 representations with 6 objecting and 2 in support. The objections to the proposal can be summarised as: traffic; noise; light and safety concerns; loss of natural spaces or habitat; location; pollution concerns; and impacts on the water environment. The support is generally on the basis of the positive contribution to combating climate change.
- Consultation responses present no impediment to the development.
- The recommendation is to GRANT PLANNING PERMISSION subject to conditions.

Drawings may be viewed at:

<https://planning.inverclyde.gov.uk/Online/applicationDetails.do?activeTab=documents&keyVal=S0JZJIMIC000>

SITE DESCRIPTION

The application site is part of an agricultural field adjacent to Flatterton Farm situated to the south-west to the junction of Flatterton Road and a private access serving Flatterton Farm and Leitchland Farm. The site is approximately 1km south-west of Greenock with the closest residential area being Braeside and the site is approximately 350m north of the A78 trunk road.

The site is uneven with significant variations in levels throughout. A watercourse is located to the south-west periphery of the site within the Howford Glen. There is a pronounced east to west slope within the field. The site area is 0.98Ha and located at between 85m to 93m Above Ordnance Datum. Flatterton Road is generally narrow with few identifiable passing places. Flatterton Road is also a Core Path (18A - Ravenscraig to Howford Glen).

BACKGROUND

The applicant was required to submit a Proposal of Application Notice (POAN) at least 12 weeks prior to the submission of a planning application. The proposal of application notice dated 29 March 2023 (ref: 23/0001/PREAPP) was accepted by the Planning Authority as satisfactory on 30 March 2023. The full planning application was received on 6 September 2023 (within the dates specified under Section 35B(3) of the Town and Country Planning (Scotland) Act 1997 (as amended)). Two in-person community consultation events at local venues were undertaken on 5 and 23 May 2023 respectively. A further online event was undertaken on 17 May 2023. The events were publicised in local press 7 days in advance (in accordance with the requirements under the act). In summary, the Planning Authority is satisfied that the terms of the act, in respect of community pre application consultation, have been met.

PROPOSAL

The proposed development is a battery energy storage system (BESS). The development will provide grid stabilisation and battery energy storage. The development consists of a battery energy storage system which the applicant has advised will have a maximum generating capacity of 49.9MW. The applicant has indicated the intended lifetime of the proposal is 40 years after which the facility will be decommissioned and the land restored to its former state.

The proposal comprises the following.

Containerised units

The site will contain 13 battery units. Each battery unit will be contained within shipping style containers with doors on the two side elevations. Each container measures 12.2m long, 2.4m wide and 2.9m high, with ventilation, cooling units and air conditioning units. The setting out of the battery containers will be in two parallel rows comprising eight and five which area aligned north-east to south-west. Invertors are located between the battery storage units.

Distribution network operator (DNO) compound

A DNO breaker and compound are located to the north of the site. DNO housing units are to be 3.55m high, 5m wide and 10.05m long. The DNO compound is 20m by 23m and contains unboxed equipment, circuit breakers, disconnectors and transformers. A 2.4m high galvanized palisade fence will be erected around the compound.

Operator compound and switchroom

The compound will contain a transformer and disconnector and will be 19m by 20m. The main site cable terminates at this location. An area marked as a 'customer compound' is adjacent. A customer switchroom is located to the immediate north of the battery containers and is to be 12.2m long, 2.4m wide and 2.9m high.

Drainage

An attenuation pond is proposed at the south boundary of the site. Details of site drainage/Sustainable Urban Drainage System (SUDS) have been provided. This includes an outline SUDS design drawing supported by a Drainage Impact Assessment (DIA).

Landscaping

The applicant proposes planting to the north, east and west within the site. The submission includes a Landscape and Ecology Management Plan. The plan includes grassland and wildflower mixes, an indicative planning schedule which includes species types and sizes and a maintenance schedule.

Access

Access to the site will be from Flatterton Road, with an internal access track running along the north of the site towards the compound areas. The track will have a width of 5m. Composition of the track will be permeable geotextile and aggregate. The applicant has provided details of a 90m x 2.4m visibility splay onto Flatterton Road, which involves the removal or realignment of 73m of hedge. A further 14m of hedge would be removed to form the bellmouth at the access.

Security and fencing

The 2.4m high palisade fence will encircle the customer and DNO compound, in addition to providing a larger security enclosure around the site but excluding the pond, access road and planting. 4m high CCTV mounted on galvanized steel posts will be situated at two locations on the site periphery. Security lighting will be infra-red and the applicant has suggested that mobile or temporary lighting may be utilised dependent on requirements.

Connection to Spango Valley Sub-Station

The development is approximately 1.8km from the Spango Valley Sub-Station. Connection to the substation however does not form part of this application.

Construction compound

The northern part of the proposed site is to be the temporary construction compound.

Indicated Construction Period

The construction period is indicated as being approximately nine months in duration. The applicant has proposed restricting construction hours and has suggested these being from 7am to 7pm Mondays to Fridays and from 8am to 4pm on Saturdays.

Submitted Reports

The planning application has been accompanied with: a Biodiversity Management Plan (September 2023); Cultural Heritage Assessment (September 2023); Ecological Assessment (September 2023); Hydrological Flow Assessment (August 2023); Noise Impact Assessment (February 2024); Planning, Design and Access Statement (September 2023); Landscape and Ecological Management Plan (October 2023); Construction and Traffic Management Plan (October 2023); Landscape and Visual Appraisal (September 2023); Drainage Impact Assessment (January 2024).

DEVELOPMENT PLAN POLICIES

National Planning Framework 4

NPF4 was adopted by the Scottish Ministers on 13th February 2023. NPF4 forms part of the statutory development plan, along with the Inverclyde Local Development Plan and its supplementary guidance. NPF4 supersedes National Planning Framework 3 (NPF3) and Scottish Planning Policy (SPP) (2014). NPF3 and SPP no longer represent Scottish Ministers' planning policy. The Clydeplan Strategic Development Plan and associated supplementary guidance cease to have effect from 13th February 2023 and as such no longer form part of the development plan.

The development draws support from NPF4 in principle. NPF4 clearly states "As technologies continue to develop, storage and other forms of generation will grow" and also outlines general support for storage technology and capacity. The document also details that the planning system should 'provide support' for energy storage.

There are six overarching spatial principles contained within NPF4. The most pertinent to renewable energy is 'just transition'. This principle is designed to ensure that the move to net zero is fair and inclusive.

NPF4 contains 33 policies and the following are considered relevant to this application.

Policy 1 Tackling the climate and nature crisis

When considering all development proposals significant weight will be given to the global climate and nature crises.

Policy 2 Climate mitigation and adaptation

- a) Development proposals will be sited and designed to minimise lifecycle greenhouse gas emissions as far as possible.
- b) Development proposals will be sited and designed to adapt to current and future risks from climate change.
- c) Development proposals to retrofit measures to existing developments that reduce emissions or support adaptation to climate change will be supported

Policy 3 Biodiversity

- a) Development proposals will contribute to the enhancement of biodiversity, including where relevant, restoring degraded habitats and building and strengthening nature networks and the connections between them. Proposals should also integrate nature-based solutions, where possible.
- b) Development proposals for national or major development, or for development that requires an Environmental Impact Assessment will only be supported where it can be demonstrated that the proposal will conserve, restore and enhance biodiversity, including nature networks so they are in a demonstrably better state than without intervention. This will include future management. To inform this, best practice assessment methods should be used. Proposals within these categories will demonstrate how they have met all of the following criteria:

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

d) Any potential adverse impacts, including cumulative impacts, of development proposals on biodiversity, nature networks and the natural environment will be minimised through careful planning and design. This will take into account the need to reverse biodiversity loss, safeguard the ecosystem services that the natural environment provides, and build resilience by enhancing nature networks and maximising the potential for restoration.

Policy 4 Natural Places

f) Development proposals that are likely to have an adverse effect on species protected by legislation will only be supported where the proposal meets the relevant statutory tests. If there is reasonable evidence to suggest that a protected species is present on a site or may be affected by a proposed development, steps must be taken to establish its presence. The level of protection required by legislation must be factored into the planning and design of development, and potential impacts must be fully considered prior to the determination of any application.

Policy 5 Soils

a) Development proposals will only be supported if they are designed and constructed:

- i. In accordance with the mitigation hierarchy by first avoiding and then minimising the amount of disturbance to soils on undeveloped land; and
- ii. In a manner that protects soil from damage including from compaction and erosion, and that minimises soil sealing.

b) Development proposals on prime agricultural land, or land of lesser quality that is culturally or locally important for primary use, as identified by the LDP, will only be supported where it is for:

v. The generation of energy from renewable sources or the extraction of minerals and there is secure provision for restoration; and In all of the above exceptions, the layout and design of the proposal minimises the amount of protected land that is required.

Policy 8 Green Belt

a) Development proposals within a green belt designated within the LDP will only be supported if:

they are for:

- minerals operations and renewable energy developments
- and;

ii) the following requirements are met:

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

Policy 11 Energy

a) Development proposals for all forms of renewable, low-carbon and zero emissions technologies will be supported. Relevant policy strands to this proposal include;

- ii. enabling works, such as grid transmission and distribution infrastructure;
- iii. energy storage, such as battery storage and pumped storage hydro;

c) Development proposals will only be supported where they maximise net economic impact, including local and community socio-economic benefits such as employment, associated business and supply chain opportunities.

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

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

- In considering these impacts, significant weight will be placed on the contribution of the proposal to renewable energy generation targets and on greenhouse gas emissions reduction targets.
- Grid capacity should not constrain renewable energy development. It is for developers to agree connections to the grid with the relevant network operator. In the case of proposals for grid infrastructure, consideration should be given to underground connections where possible.

Policy 14 design, quality and place

a) Development proposals will be designed to improve the quality of an area whether in urban or rural locations and regardless of scale.

b) Development proposals will be supported where they are consistent with the six qualities of successful places:

Healthy: Supporting the prioritisation of women's safety and improving physical and mental health.

Pleasant: Supporting attractive natural and built spaces.

Connected: Supporting well connected networks that make moving around easy and reduce car dependency

Distinctive: Supporting attention to detail of local architectural styles and natural landscapes to be interpreted, literally or creatively, into designs to reinforce identity.

Sustainable: Supporting the efficient use of resources that will allow people to live, play, work and stay in their area, ensuring climate resilience, and integrating nature positive, biodiversity solutions.

Adaptable: Supporting commitment to investing in the long-term value of buildings, streets and spaces by allowing for flexibility so that they can be changed quickly to accommodate different uses as well as maintained over time.

Further details on delivering the six qualities of successful places are set out in Annex D.

Policy 22 Flood risk and water management

c) Development proposals will:

i. not increase the risk of surface water flooding to others, or itself be at risk.

ii. manage all rain and surface water through sustainable urban drainage systems (SUDS), which should form part of and integrate with proposed and existing blue and green infrastructure. All proposals should presume no surface water connection to the combined sewer;

iii. seek to minimise the area of impermeable surface.

Policy 23 – Health and Safety

e) Development proposals that are likely to raise unacceptable noise issues will not be supported. The agent of change principle applies to noise sensitive development. A Noise Impact Assessment may be required where the nature of the proposal or its location suggests that significant effects are likely.

Policy 29 Rural Development

- a) Development proposals that contribute to the viability, sustainability and diversity of rural communities and local rural economy will be supported, including:
- i. farms, crofts, woodland crofts or other land use businesses, where use of good quality land for development is minimised and business viability is not adversely affected;
 - ii. diversification of existing businesses;
 - iii. production and processing facilities for local produce and materials, for example sawmills, or local food production;
 - iv. essential community services;
 - v. essential infrastructure;
 - vi. reuse of a redundant or unused building;
 - vii. appropriate use of a historic environment asset or is appropriate enabling development to secure the future of historic environment assets;
 - viii. reuse of brownfield land where a return to a natural state has not or will not happen without intervention;
 - ix. small scale developments that support new ways of working such as remote working, homeworking and community hubs; or
 - x. improvement or restoration of the natural environment.

b) Development proposals in rural areas should be suitably scaled, sited and designed to be in keeping with the character of the area. They should also consider how the development will contribute towards local living and take into account the transport needs of the development as appropriate for the rural location.

Adopted 2019 Local Development Plan Policies

Policy 1 - Creating Successful Places

Inverclyde Council requires all development to have regard to the six qualities of successful places. In preparing and assessing development proposals, consideration must be given to the factors set out in Figure 3 and demonstrated in a design-led approach. Where relevant, applications will also be assessed against the Planning Application Advice Notes Supplementary Guidance.

Policy 4 - Supplying Energy

Proposals for infrastructure for the generation, storage or distribution of heat and electricity will be supported in principle where they contribute to a reduction in greenhouse gas production. Proposals will be assessed with regard to impact, including cumulative impact on:

- a) the resources protected by the Plan's historic buildings and places and natural and open spaces chapters;
- b) the amenity and operations of existing and adjacent uses;
- c) tourism and recreational resources;
- d) air quality;
- e) aviation and defence interests;
- f) telecommunication and broadcasting interests; and
- g) traffic and pedestrian safety

Where relevant, proposals are to be accompanied with restoration plans acceptable to the Council. Relevant proposals are required to accord with the Council's Supplementary Guidance on Energy.

Policy 8 - Managing Flood Risk

Development proposals will be assessed against the Flood Risk Framework set out in Scottish Planning Policy. Proposals must demonstrate that they will not:

- a) be at significant risk of flooding (i.e. within the 1 in 200 year design envelope);
- b) increase the level of flood risk elsewhere; and

c) reduce the water conveyance and storage capacity of a functional flood plain.

The Council will support, in principle, the flood protection schemes set out in the Clyde and Loch Lomond Local Flood Risk Management Plan 2016, subject to assessment of the impacts on the amenity and operations of existing and adjacent uses, the green network, historic buildings and places, and the transport network.

Policy 9 - Surface and Waste Water Drainage

New build development proposals which require surface water to be drained should demonstrate that this will be achieved during construction and once completed through a Sustainable Drainage System (SuDS), unless the proposal is for a single dwelling or the discharge is directly to coastal waters.

The provision of SuDS should be compliant with the principles set out in the SuDS Manual C753 and Sewers for Scotland 3rd edition, or any successor documents.

Where waste water drainage is required, it must be demonstrated that the development can connect to the existing public sewerage system. Where a public connection is not feasible at present, a temporary waste water drainage system can be supported if:

- i) a public connection will be available in future, either through committed sewerage infrastructure or pro-rata developer contributions; and
- ii) the design of, and maintenance arrangements for, the temporary system meet the requirements of SEPA, Scottish Water and Inverclyde Council, as appropriate.

Private sustainable sewerage systems within the countryside can be supported if it is demonstrated that they pose no amenity, health or environmental risks, either individually or cumulatively.

Developments including SuDS are required to have an acceptable maintenance plan in place.

Policy 10 - Promoting Sustainable and Active Travel

Development proposals, proportionate to their scale and proposed use, are required to:

- a) provide safe and convenient opportunities for walking and cycling access within the site and, where practicable, include links to the wider walking and cycling network; and
- b) include electric vehicle charging infrastructure, having regard to the Energy Supplementary Guidance.

Proposals for development, which the Council considers will generate significant travel demand, are required to be accompanied by a travel plan demonstrating how travel to and from the site by means other than private car will be achieved and encouraged. Such development should also demonstrate that it can be accessed by public transport.

The Council will support the implementation of transport and active travel schemes as set out in Council-approved strategies, subject to adequate mitigation of the impact of the scheme on: development opportunities; the amenity and operations of existing and adjacent uses; the green network; and historic buildings and places.

Policy 11 - Managing Impact of Development on the Transport Network

Development proposals should not have an adverse impact on the efficient operation of the transport and active travel network. Development should comply with the Council's roads development guidelines and parking standards. Developers are required to provide or contribute to improvements to the transport network that are necessary as a result of the proposed development.

Policy 14 - Green Belt and Countryside

Development in the Green Belt and Countryside will only be permitted if it is appropriately designed, located, and landscaped, and is associated with:

- a) agriculture, horticulture, woodland or forestry;
- b) a tourism or recreational use that requires a countryside location;
- c) infrastructure with a specific locational need;
- d) the appropriate re-use of a redundant stone or brick building, the retention of which is desirable for its historic interest or architectural character, subject to that interest or character being retained; or
- e) intensification (including extensions and outbuildings) of an existing use, which is within the curtilage of the associated use and is of an appropriate scale and form.

Proposals associated with the uses set out in criteria a)-c) must provide justification as to why the development is required at the proposed location.

Policy 33 - Biodiversity and Geodiversity Natura 2000 sites

Development proposals that are likely to have a significant effect on a Natura 2000 site will be subject to an appropriate assessment of the implications of the proposal on conservation objectives. Proposals will only be permitted if the assessment demonstrates that there will be no adverse effect on the integrity of the site or if:

- a) there are no alternative solutions; and
- b) there are imperative reasons of overriding public interest, including those of a social or economic nature; and
- c) compensatory measures are provided to ensure that the overall coherence of the Natura network is protected.

In such cases, the Scottish Ministers must be notified.

Sites of Special Scientific Interest

Development affecting Sites of Special Scientific Interest will only be permitted where the objectives of the designation and the overall integrity of the area will not be compromised, or if any significant adverse effects on the qualities for which the area has been designated are clearly outweighed by social, environmental or economic benefits of national importance.

Protected Species

When proposing any development which may affect a protect species, the applicant should fulfil the following requirements: to establish whether a protected species is present; to identify how the protected species may be affected by the development; to ensure that the development is planned and designed so as to avoid or minimise any such impact, while having regard to the degree of protection which is afforded by legislation, including any separate licensing requirements; and to demonstrate that it is likely that any necessary licence would be granted.

Local Nature Conservation Sites

Development is required to avoid having a significant adverse impact on Local Nature Conservation Sites. Any adverse impacts are to be minimised. Where adverse impacts are unavoidable, compensatory measures will be required.

Local Landscape Area

Development that affects the West Renfrew Hills Local Landscape Area is required to protect and, where possible, enhance its special features as set out in the Statement of Importance. Where there is potential for development to result in a significant adverse landscape and/or visual impact, proposals should be informed by a landscape and visual impact assessment.

Non-designated sites

The siting and design of development should take account of local landscape character. All development should seek to minimise adverse impact on wildlife, especially species and habitats identified in the Local Biodiversity Action Plan. Development should take account of connectivity between habitat areas. Where possible, new development should be designed to conserve and enhance biodiversity.

Policy 38 - Path Network

Development that would result in the loss of a core path, right of way or other important outdoor access route will not be permitted unless acceptable alternative provision can be made.

Where applicable, development proposals will be required to provide new paths in order to encourage active travel and/or connectivity to the green network. The provision of routes along water will be an essential requirement on development sites with access to a waterfront, unless not appropriate for operational or health and safety reasons.

Policy 39 - Water Environment

Development proposals affecting the water environment will be required to safeguard and improve water quality and the enjoyment of the water environment by:

- a) supporting the strategies and actions of the national and regional marine plans, and supporting the objectives and actions of the River Basin Management Plan for Scotland and the Clyde Area Management Plan, where applicable;
- b) minimising adverse impacts on, or improving, water quality, flow rate, morphology, riparian habitat and groundwater dependent terrestrial ecosystems;
- c) the removal of existing culverts. This will be a requirement on development sites, unless it can be clearly demonstrated as not practical or resulting in the development not being viable;
- d) avoiding the hard engineering and culverting of waterways and the building over of existing culverts in new developments unless clearly demonstrated to be essential. Where culverts are required, they should be designed to maintain existing flow conditions and aquatic life, with long term maintenance arrangements; maintaining or improving waterside and water-based habitats; and
- e) providing appropriately sized buffer strips between development and watercourses, in line with SEPA guidance, and providing access to the water and waterside, where appropriate.

Proposed 2021 Inverclyde Local Development Plan Policies

Policy 1 - Creating Successful Places

Inverclyde Council requires all development to have regard to the six qualities of successful places. In preparing and assessing development proposals, consideration must be given to the factors set out in Figure 3 and demonstrated in a design-led approach. Where relevant, applications will also be assessed against the Planning Application Advice Notes and Design Guidance for New Residential Development Supplementary Guidance. When assessing proposals for the development

opportunities identified by this Plan, regard will also be had to the mitigation and enhancement measures set out in the Strategic Environmental Assessment Environmental Report.

Policy 4 - Supplying Energy

Proposals for infrastructure for the generation, storage or distribution of heat and electricity will be supported in principle where they contribute to a reduction in greenhouse gas production. Proposals will be assessed with regard to impact, including cumulative impact on:

- a) the resources protected by the Plan's historic buildings and places and natural and open spaces chapters;
- b) the amenity and operations of existing and adjacent uses;
- c) tourism and recreational resources;
- d) air quality;
- e) aviation and defence interests;
- f) telecommunication and broadcasting interests; and
- g) traffic and pedestrian safety

Where relevant, proposals are to be accompanied with restoration plans acceptable to the Council. Relevant proposals are required to accord with the Council's Supplementary Guidance on Energy.

Policy 9 - Managing Flood Risk

Development proposals will be assessed against the Flood Risk Framework set out in Scottish Planning Policy. Proposals must demonstrate that they will not:

- a) be at significant risk of flooding (i.e. within the 1 in 200 year design envelope);
- b) increase the level of flood risk elsewhere; and
- c) reduce the water conveyance and storage capacity of a functional flood plain.

The Council will support, in principle, the flood risk management schemes set out in the Clyde and Loch Lomond Local Flood Risk Management Plan 2016, subject to assessment of the impacts on the amenity and operations of existing and adjacent uses, the resources protected by the Plans historic buildings and places and natural and open spaces chapters, and the transport network. Where practical and effective, nature-based solutions to flood management will be preferred.

Policy 10 - Surface and Waste Water Drainage

New build development proposals which require surface water to be drained should demonstrate that this will be achieved during construction and once completed through a Sustainable Drainage System (SuDS), unless the proposal is for a single dwelling or the discharge is directly to coastal waters.

The provision of SuDS should be compliant with the principles set out in the SuDS Manual C753 and Sewers for Scotland 4th edition, or any successor documents.

Where waste water drainage is required, it must be demonstrated that the development can connect to the existing public sewerage system. Where a public connection is not feasible at present, a temporary waste water drainage system can be supported if:

- a) a public connection will be available in future, either through committed sewerage infrastructure or pro-rata developer contributions; and
- b) the design of, and maintenance arrangements for, the temporary system meet the requirements of SEPA, Scottish Water and Inverclyde Council, as appropriate.

Private sustainable sewerage systems within the countryside can be supported if it is demonstrated that they pose no amenity, health or environmental risks, either individually or cumulatively.

Developments including SuDS are required to have an acceptable maintenance plan in place, which identifies who will be responsible for maintenance and how this will be funded in the long term.

Policy 11 - Promoting Sustainable and Active Travel

Development proposals, proportionate to their scale and proposed use, are required to:

- a) provide safe and convenient opportunities for walking and cycling access within the site and, where practicable, including links to the wider walking, cycling network and public transport network; and
- b) include electric vehicle charging infrastructure, having regard to the Energy Supplementary Guidance.

Proposals for development, which the Council considers will generate significant travel demand, are required to be accompanied by a travel plan demonstrating how travel to and from the site by means other than private car will be achieved and encouraged. Such development should also demonstrate that it can be accessed by public transport.

The Council will support the implementation of transport and active travel schemes as set out in national, regional and Council-approved strategies, subject to adequate mitigation of the impact of the scheme on: development opportunities; the amenity and operations of existing and adjacent uses; and the resources protected by the Plan's historic buildings and places and natural and open spaces chapters.

Policy 12 - Managing Impact of Development on the Transport Network

Development proposals should not have an adverse impact on the efficient operation of the transport and active travel network. Development should comply with the Council's roads development guidelines and parking standards, including cycle parking standards. Developers are required to provide or financially contribute to improvements to the transport network that are necessary as a result of the proposed development.

Policy 15 - Green Belt and Countryside

Development in the Green Belt and Countryside will only be permitted if it is appropriately designed, located, and landscaped, and is associated with:

- a) agriculture, horticulture, woodland or forestry;
- b) a tourism or recreational use that requires a countryside location;
- c) infrastructure with a specific locational need;
- d) the appropriate re-use of a redundant stone or brick building, the retention of which is desirable for its historic interest or architectural character, subject to that interest or character being retained; or
- e) intensification (including extensions and outbuildings) within the curtilage of an existing use, which is of an appropriate scale and form.

Proposals associated with the uses set out in criteria a)-c) must provide justification as to why the development is required at the proposed location. Proposals in the green belt must not undermine the objectives of the green belt as set out in Scottish Planning Policy and the Clydeplan Strategic Development Plan. Non-conforming uses will only be considered favourably in exceptional or mitigating circumstances.

Policy 33 - Biodiversity and Geodiversity European sites

Development proposals that are likely to have a significant effect on a European site which are not directly connected with or necessary to their conservation management must be subject to an appropriate assessment of the implications of the proposal on conservation objectives. Proposals

will only be permitted if the assessment demonstrates that there will be no adverse effect on the integrity of the site either during construction or operation of the development, or if:

- a) there are no alternative solutions; and
- b) there are imperative reasons of overriding public interest, including those of a social or economic nature; and
- c) compensatory measures are provided to ensure that the overall coherence of the network is protected.

In such cases, the Scottish Ministers must be notified.

Sites of Special Scientific Interest

Development affecting Sites of Special Scientific Interest will only be permitted where the objectives of the designation and the overall integrity of the area will not be compromised, or if any significant adverse effects on the qualities for which the area has been designated are clearly outweighed by social, environmental or economic benefits of national importance.

Protected Species

When proposing any development which may affect a protected species, the applicant should fulfil the following requirements: to establish whether a protected species is present; to identify how the protected species may be affected by the development; to ensure that the development is planned and designed so as to avoid or minimise any such impact, while having regard to the degree of protection which is afforded by legislation, including any separate licensing requirements; and to demonstrate that it is likely that any necessary licence would be granted.

Local Nature Conservation Sites

Development is required to avoid having a significant adverse impact on Local Nature Conservation Sites. Any adverse impacts are to be minimised. Where adverse impacts are unavoidable, adequate compensatory measures will be required.

Non-designated sites

All development should seek to minimise adverse impact on wildlife, especially species and habitats identified in the Local Biodiversity Action Plan. Development should take account of connectivity between habitat areas. Where possible, new development should be designed to conserve and enhance biodiversity.

Policy 34 - Landscape

The siting and design of development should take account of local landscape character and setting in order to conserve, enhance and/or restore landscape character and distinctiveness. Development should aim to conserve those features that contribute to local distinctiveness including:

- a) the setting of buildings and settlements within the landscape
- b) the pattern of woodlands, fields, hedgerows and trees; especially where they define/ create a positive settlement/ urban edge
- c) the character and distinct qualities of river corridors
- d) historic landscapes
- e) topographic features, including important/prominent views, vistas and panoramas

When assessing development proposals likely to have a significant impact on the landscape, the guidance contained in the Glasgow and Clyde Valley Landscape Character Assessment will be taken into account.

Development that affects the West Renfrew Hills Local Landscape Area is required to protect and, where possible, enhance its special landscape qualities as set out in the Statement of Importance. Where there is potential for development to result in a significant adverse landscape and/or visual impact, proposals should be amended to avoid or mitigate these impacts through being informed by a landscape and visual impact assessment.

Policy 36 - Safeguarding Green Infrastructure

Proposals for new or enhanced open spaces, which are appropriate in terms of location, design and accessibility, will be supported.

Development proposals that will result in the loss of open space which is, or has the potential to be, of quality and value, will not be permitted, unless provision of an open space of equal or enhanced quality and value is provided within the development or its vicinity.

Outdoor sports facilities will be safeguarded from development except where:

- a) the proposed development is ancillary to the principal use of the site as an outdoor sports facility, or involves only a minor part of the facility and would not affect its use for sport and training;
- b) the facility to be lost is to be replaced by a new or upgraded facility of comparable or better quality, which is convenient for the users of the original facility and maintains or improves overall playing capacity in the area; or
- c) a relevant strategy demonstrates a clear excess of provision to meet current and anticipated demand, and the development would not result in a reduction in the overall quality of provision.

Development that would result in the loss of a core path, right of way or other important outdoor access route will not be permitted unless acceptable alternative provision can be made.

Policy 39 - Water Environment

Development proposals affecting the water environment will be required to safeguard and improve water quality and the enjoyment of the water environment by:

- a) supporting the strategies and actions of the national and regional marine plans, and supporting the objectives and actions of the River Basin Management Plan for Scotland and the Clyde Area Management Plan, where applicable;
- b) minimising adverse impacts on, or improving, water quality, flow rate, morphology, riparian habitat and groundwater dependent terrestrial ecosystems;
- c) the removal of existing culverts. This will be a requirement on development sites, unless it can be clearly demonstrated as not practical or resulting in the development not being viable;
- d) avoiding the hard engineering and culverting of waterways and the building over of existing culverts in new developments unless clearly demonstrated to be essential. Where culverts are required, they should be designed to maintain existing flow conditions and aquatic life, with long term maintenance arrangements; maintaining or improving waterside and water-based habitats; and
- e) providing appropriately sized buffer strips between development and watercourses, in line with SEPA guidance, and providing access to the water and waterside, where appropriate.

CONSULTATIONS

Head of Service - Roads and Transportation – advises the following:

- That the applicant should demonstrate on site parking for minimum of 6 vehicles

- Parking bays should adhere to national parking standards (2.5m x 5.0m x 6.0 aisle spacing)
- The visibility splay should be maintained in perpetuity and the hedgerow realigned to achieve this
- Access should be 4.8m wide and should be paved for 10m and at a maximum gradient of 10%
- The DIA/FRA document was latterly independently checked to the satisfaction of Roads and Transportation
- Details of discharge control are now satisfactory
- Rates of greenfield run off do not exceed existing use run off
- Corrections have been made to the DIA errors (including the climate change factor)
- Drawings of drainage will be required pre-construction

Scottish Environmental Protection Agency - advises of no objection on the basis that no land raising is proposed.

Public Protection Manager - advises the following: the discovery of Japanese Knotweed or other contamination should be recorded and a mitigation scheme provided; all external lighting should comply with Scottish Government Guidance; Noise should be between noise rating curve 25 - 35 (night – day); and a 3m high acoustic fence should be erected on the north-east boundary.

Transport Scotland – do not object the proposal but have asked for consideration to be given to the requirement for temporary traffic management measures such as signage. Transport Scotland also advise that permission may require to be sought for physical works to the trunk road network. Such modifications should comply with the Design Manual for Roads and Bridges and relevant disability legislation. Should abnormal loads be considered, the proposed route would require verification. Changes to the trunk road network such as the removal of street furniture, junction widening and traffic management would require the authorisation of Transport Scotland.

Scottish Fire and Rescue Service – have considered the fire safety implications of the proposal and have not offered any comments.

Archaeology Advisor - advises that Scheduled Ancient Monuments are sufficiently distant from the site that there will be no impact on the setting of these monuments. The Flatterton Farmstead may be buried in the vicinity of the proposed site and the Flatterton Aircraft Battery is located to the north of the site. Further advises there is some potential for buried archaeological remains within the site itself and that an archeological watching brief condition be attached if approved, requiring a watching brief on all ground breaking works that involve soil disturbance.

PUBLICITY

The application was advertised in the Greenock Telegraph on 20th of October 2023 as there are no premises on neighbouring land.

SITE NOTICES

This type of application does not require a site notice.

PUBLIC PARTICIPATION

There have been 8 representations received in relation to this application, of which there are 6 objections and 2 in support.

The objections can be summarised as follows:

- The application has not been widely publicised

- Management of noise impact
- Traffic impacts and dangers from construction traffic
- Health and safety impacts
- Request to consult directly with specific areas/residents
- Lack of community benefit
- Profiteering from greenbelt land
- Effects of light pollution
- Loss of wild space
- Unproven type of development
- Loss of a walking area
- Fire danger and chemical pollution
- Loss of a natural space
- Loss of species habitat
- Impacts on the future of Inverclyde and tourism
- Should be closer to a major road
- Bacterial effects from standing water in SUDS ponds
- Pollution of ground water and private water supplies
- Potential flooding impact
- Insufficient SUDS capacity
- Intrusion on the green belt
- Impact on Flatterton to Lunderson bay right of way route
- Incompatible with landscape character and Clyde Muirshiel Park
- Surface water run off in conjunction with potential reuse of hydro scheme

The representations in support can be summarised as follows:

- A positive green energy contribution
- Contribution to local and national goals of carbon reduction
- Reduces carbon footprint
- Sustainable future for Greenock

A number of concerns were raised via the Proposal of Application Notice (POAN) public consultation events and engagement. Although these comments are not formally part of the assessment process for this planning application, the concerns raised are acknowledged. The representations received via the consultation process for this application have included a broad range of issues which are addressed in detail throughout this report.

ASSESSMENT

This is a Major Development as defined by the Town and Country Planning (Hierarchy of Developments) (Scotland) Regulations 2009 as the proposal exceeds 20MW and does not exceed 50MW.

National Policy and Principle of the Development

National Planning Framework 4 (NPF4) sets out Scottish Ministers policies and proposals for the development and use of land. It plays a key role in supporting the delivery of Scotland's outcomes and the United Nations Sustainable Development Goals. Part 1 of NPF4 sets out a Spatial Strategy for Scotland until 2045 and identifies developments of national importance to help deliver that strategy. The need for Strategic Renewable Electricity Generation and Transmission Infrastructure is established therein. The generation of electricity from batteries is not in itself a renewable source of energy and the generation of electricity from the batteries will not contribute to national targets for

production of electricity from renewable energy. However, the proposed development can be considered in general terms to be essential infrastructure through the provision of energy storage that adds flexibility and resilience to maintain and secure reliable supplies of energy.

Part 2 of NPF4 sets out National Planning Policy. NPF4 should be read as a whole, and the weight given to policies therein decided on a case-by-case basis. The greatest weight in consideration of the development in the context of NPF4 is the policy on Energy (Policy 11). The policy establishes an intent to encourage, promote and facilitate all forms of renewable energy development onshore and offshore. The description in the policy includes energy generation, storage, and new and replacement transmission and distribution infrastructure. Storage is part of the infrastructure necessary to support the continued expansion of renewable energy developments necessary for decarbonising electricity supply. Battery storage is able to capture excess electricity produced by renewables when supply outstrips demand and release stored energy as electricity when renewable output is slow, helping balance the system and avoid curtailing renewable generation. Battery storage can therefore be considered consistent with the policy principles of national policy for tackling the climate and nature crises.

The energy policy sets out the matters that are to be addressed in the design and mitigation of a development including: impacts on communities and individual dwellings; significant landscape and visual impacts; public access; impacts on aviation and defence interests including seismological recording; impacts on telecommunications and broadcasting installations, particularly ensuring that transmission links are not compromised; impacts on road traffic and on adjacent trunk roads, including during construction; impacts on historic environment; effects on hydrology, the water environment and flood risk; biodiversity including impacts on birds; impacts on trees, woods and forests; proposals for the decommissioning of developments, including ancillary infrastructure, and site restoration; the quality of site restoration plans including the measures in place to safeguard or guarantee availability of finances to effectively implement those plans; and cumulative impacts.

Policy 11 c) states that development proposals will only be supported where they maximise net economic impact, including local and community socio-economic benefits such as employment, associated business and supply chain opportunities. The direct economic impacts of the development are difficult to quantify although there are likely to be some as a result of the construction of the development and supply chain opportunities involved. The main benefit of the proposal is that is part of infrastructure needed to support the continued expansion of renewable energy developments necessary for decarbonising electricity supply. No specific quantitative analysis is provided, though negative economic impacts are not anticipated. The proposal is therefore consistent with the terms of Policy 11 c) of NPF4.

The proposed development is designed to support the flexible operation of the National Grid and decarbonisation of electricity supply. It is considered in general terms to directly contribute to achieving CO₂ emissions reduction targets, whilst diversifying the energy mix. NPF4 supports renewable energy developments under Policy 11 which in turn supports the general terms of Policy 1 to address the global climate and nature crises. The proposal therefore accords with the general terms of Policies 1 and 11 of NPF4.

Location of the Development

The key policies of both the adopted and proposed Local Development Plans in relation to the proposed development are Policy 4, in respect of supplying energy as well as Policy 14 of the adopted Local Development Plan and Policy 15 of the proposed Local Development Plan as the site is in the Green Belt.

It has been indicated that battery storage facilities have to be located within close proximity of a viable grid connection that has sufficient capacity to import and export power that will be stored and released into the grid at times of peak demand. Suitable points of connection include a sub-station or an overhead power line. When a suitable connection can be found, other factors need to be taken into consideration that impact the viability and feasibility of a battery storage facility, particularly the

distance from a sub-station. A battery storage facility could potentially be developed up to 2km from the point of the connection however the level of efficiency reduces the further away from the connection the facility is located.

Policy 1 of the adopted and proposed LDPs require all development to have regard to the six qualities of successful places. The relevant factors in this instance are being “Resource Efficient” by using previously developed land for the effective management of renewable energy and “Safe and Pleasant” by avoiding conflict between adjacent uses by having regard to adverse amenity impacts.

Policy 4 indicates that proposals for infrastructure for the generation, storage or distribution of heat and electricity will be supported in principle where they contribute to a reduction in greenhouse gas production. Proposals will be assessed with regard to impact on: the green network (including landscape) and historic buildings and places; the amenity and operations of existing and adjacent uses; tourism and recreational resources; air quality; aviation and defence interests; telecommunication and broadcasting interests; and traffic and pedestrian safety.



View across to the site from the north-east at the junction of the access to Flatterton Farm with Flatterton Road

The proposed development is designed to support the flexible operation of the National Grid and decarbonisation of electricity supply. It is considered in general terms to directly contribute to achieving CO₂ emissions reduction targets, whilst diversifying the energy mix. The assessment also concludes that adjacent uses are not adversely impacted by the development. Amenity impacts are proportionate to the development type and scale and are not considered unacceptable. The imposition of conditions would also mitigate against any effects considered unavoidable. No aviation, defence or telecommunication issues are considered likely as a result of the development. The nature of the development is such that air quality would not be impacted. Matters related to traffic safety are discussed elsewhere within this assessment. There are no demonstrable impacts on historic or natural resources.

It is not considered that the proposed development would unacceptably impact on tourism and recreation. Although there is a degree of visual and landscape impact from the core path adjacent to the site, this does not automatically result in tourism being affected to an unacceptable level. The section of core path impacted is relatively short in length and therefore short in effect duration, and the impacts are further mitigated by proposed planting and screening. Views from the core path towards the proposed development will also be influenced by other existing elements of the built

environment. A core path is often experienced across substantial parts of whole route length. Using a core path for recreation will involve a progressive variation in the visual experience of the user. It would be expected to see landscape changes which may involve developments that could be industrial to some extent. This may include electricity infrastructure and civil infrastructure such as waste water treatment. On this basis, the core path is not considered to be unacceptably impacted by the proposed development. No tourism assets at a further distance than the core path are impacted to any notable degree due to both separation distance and the relatively modest scale of the development. The Supplementary Guidance on Energy does not offer specific guidance on development of this type. The Guidance states that renewable energy developments should be removed at the end of their operational life. This advice is primarily directed towards turbine developments but some weight could be placed on installations such as this that provide supporting infrastructure and energy capacity management.

Therefore the proposal complies in general terms with Policy 4 of both the adopted and proposed Local Development Plans.

In terms of the location the site in the Green Belt and needs to be considered under Policy 8 of NPF4 and Policy 14 of the adopted Local Development Plan as well as Policy 15 of the proposed Local Development Plan. In combination these policies support renewable energy developments in the Green Belt and support infrastructure with a specific locational need where it is appropriately designed and located. The development has a specific locational need (proximity to a substation) and would therefore comply with Policy 8 of NPF4 (green belt) in respect of providing a justification for a development within the green belt. The purpose of the development is to provide supporting infrastructure for renewable development. It has been assessed that the proposal is largely compatible with the surrounding area and landscape character, minimises the visual impact and does not undermine the long term quality of the green belt. It is considered that the development is moderate in scale and is not an imposing or overbearing feature in the context of the surrounding landscape. The proposal also lacks vertical scale and is commensurate with other elements of the built and natural environment. The proposed development is therefore compliant with Policy 8 of NPF4.

The location of the development also has to be considered under Policy 5 of National Planning Framework 4 and Policy 15 of the adopted Local Development Plan as well as Policy 16 of the proposed Local Development Plan. The fields that make up the applications site are used for grazing and are indicated as being located on land that is category 5 (Improved Grassland). which is not considered to be prime agricultural land, defined by Scotland's Soils as "Land capable of producing a narrow range of crops, and with pasture that is difficult to maintain.

Renewable energy infrastructure is supported in principle by Policy 5 of NPF4, subject to the layout and design minimising the land take. The design and layout of the proposal is relatively compact, with all areas of development considered as essential to the operation, maintenance and screening of the site. It should also be noted that foundation depths are minimal and therefore soil disturbance and compaction is significantly less than would be the case with structures and buildings requiring more significant piling. The proposal is considered to meet with the terms of Policy 5.

Impact on the Landscape and Visual Impact

A Landscape and Visual Assessment (LVA) has been submitted with the application relating to the potential landscape and visual implications of the proposed development.

The LVA has allowed for a 2km study area to assess the impact of the development on both the landscape and visual amenity. A Zone of Theoretical Visibility (ZTV) was prepared to assist in identifying the visual envelope that is likely to be affected by the development. The LVA appraisal includes the following viewpoints:

- Viewpoint 1: View from junction of unclassified road and Flatterton Road

- Viewpoint 2: View from Flatterton Road close to Howford watercourse
- Viewpoint 3: View from south west at Flatterton Road/Aliemill Road
- Viewpoint 4: View from A78
- Viewpoint 5: View from close to Leitchland Farm
- Viewpoint 6: View from Drumillan Hill
- Viewpoint 7: View from Greenock Cut path

With regard to visual impacts on individual dwellings and communities, the applicant has provided an assessment of visual and landscape impacts, including viewpoints. Residential properties are considered sensitive to visual impacts, both from inside the property and areas of usable garden space and road approaches to dwellinghouses. The Zone of Theoretical Visibility indicates that visibility is evident from the north, south, east and west. However, visibility is largely localised in effect, although theoretical visibility is possible beyond 5km to the south-west.



View from the south-west corner into the site

Viewpoint 1

This viewpoint is located at the junction of Flatterton Road and the unclassified road terminating at Leitchland Farm. The visual impact is short in duration for road users and only constitutes a minor proportion of the is road, therefore minimising impacts for users. Furthermore, the existing hedgerow and planting proposed will provide relief from views of the development. This will be particularly effective in the medium to long term when the planting matures.

Viewpoint 2

This viewpoint is located on Flatterton Road close to the application site. The visual impact will be prominent from this viewpoint due to the close proximity to the development. However this impact is the same as for any viewpoint that is relatively close to a development.

Viewpoint 3

This viewpoint is on Flatterton Road to the north-west of Chrisswell, 0.3km from the site. There is little or no visibility of the development from this viewpoint due to topography and vegetation.

Viewpoint 4

This viewpoint is located south of Chrisswell on the A78 and is 0.4km from the site. There is little or no visibility of the development from this viewpoint due to the intervening topography and vegetation.

Viewpoint 5

This viewpoint is located close to Leitchland Farm. Due to the elevated position of Leitchland Farm partial views of the development will remain after the proposed screening is completed.

Viewpoint 6

This viewpoint is located at the edge of the urban area of Greenock. There is little or no visibility of the development from this viewpoint due to topography and vegetation.

Viewpoint 7

This viewpoint is from the Greenock Cut (Core Path 15) approximately 1.26km from the site. The distance of the development from this viewpoint is considerable and the proposed development will involve a limited proportion of views from this position.

In considering the visual impact the site has some existing screening with varying depths of hedgerow located at the south, west and north. The maximum height of structures within the proposed development is 4m and this is not considered to be excessive. Mitigation suggested by the applicant includes retaining planting where achievable, and further planting to provide additional screening to ensure a continuation and enhancement of the existing screening.

Although the development would be a change in the landscape, the effects are localised. It is considered that the effect on the landscape as a result of the development is minor to moderate. The proposed development is not of significant scale to result in a wider change in the landscape that would be experienced across the whole Landscape Character Area. The proposed development is not of a scale that would dominate the landscape to any significant degree. Some of the components of the development such as the containers are structures which are utilised within agricultural settings, and would not be incongruous within a semi rural or urban fringe location. Landscaping and planting would provide a softening effect, reducing the impact on the immediate landscape. The landscaping/planting can be addressed by a planning condition.

The visual impact of the proposed development is also considered to be acceptable. Some longer distance views of the development are possible, however the development would appear as a minor component of the wider landscape. At distance, the horizontal and vertical scale of the development would not appear overbearing. Although visible, the development would not be a primary, isolated focus for the viewer, and would reside within a landscape with different and varying focal points. The adjacent residential properties in the study area would have a view of the development, although topography and screening would mitigate those impacts, especially as planting matures in the medium to long term. Views from Greenock are limited to small numbers of individual properties. It should also be noted that the limited height of the development ensures that the structures and buildings would not be overbearing nor disproportionate at this location. It should also be noted that visibility from the A78, which is below the site, is significantly restricted due to the topography.

NPF4 states that landscape and visual impacts are to be expected as a result of renewables development. Therefore a degree of tolerance to such impacts should be applied to any proposals for renewable energy. Should planning permission be granted the installation and maintenance of acoustic fencing will have a secondary purpose of providing further screening of the development.

Ecology and Habitats

The applicant has provided an ecological assessment. There are no natural heritage designations at the site itself. The conclusion of the ecological assessment is that the site contains poor quality pasture and a low capacity for habitats. The assessment states that the presence of hedgerows may provide some potential habitat for badger setts and bats.

Policy 3(b) of NPF4 applies in this case as the application is for a major development. It is considered that the ecological value of the site is low. The nature of the development is such that the provision of local community benefits would be difficult to achieve. The planting proposed can however provide some habitat/biodiversity improves to comply with the requirements of Policy 3 of NPF4. Impacts on protected species are considered to be unlikely given the nature and condition of the majority of the site.

Should planning permission be granted a requirement for pre-construction species and bird breeding protection plans will be required. The applicant has submitted a landscape plan which proposes native mitigation screen planting to the north, west and east. Rich grassland will be formed around the screening areas. Artificial shelters are proposed for invertebrate and hedgehog species. The presence of hedgerows is generally considered suitable for badger habitat. These proposals could provide biodiversity improvement due to improved habitat features. A planning condition can be attached to secure the planting being carried out. Subject to the attachment of conditions the proposal is considered to generally comply with Policy 4 of NPF4.

Policy 33 of the adopted and proposed LDPs relates to biodiversity. The site at present has very limited habitat potential and of limited ecological value. The planting proposed can provide some habitat/biodiversity improves to also comply with the requirements of Policy 33 of the adopted and proposed LDPs.

Impact on the Roads Network

The applicant has provided a Construction and Traffic Management Plan and clarified details on traffic movements. The applicant has confirmed that the maximum vehicles at one time, either for routine operation of the facility or maintenance, would be one vehicle. The Head of Service - Roads and Transportation advises the requirement for six permanent parking spaces for normal operation and maintenance of the facility. The applicant has demonstrated that six parking spaces can be provided to national minimum standards. A planning condition can be attached to ensure the parking bay dimensions meet national minimum standards. The applicant has provided an indicative temporary construction compound layout with five temporary parking bays. If consented, this aspect can be addressed by a planning condition requiring full details of the temporary construction compound prior to the commencement of development.

In terms of Policy 10 of the adopted LDP and Policy 11 of the proposed LDP the development is not considered to encourage a significant degree of private vehicle travel outwith the construction period. Maintenance and operation of the development will only require one vehicle at any given time. Given the scale and type of development it is not considered that opportunities for walking and cycling would be a primary requirement. Access to the site will be restricted for safety and operational reasons. Access to the core path on Flatterton Road will not be physically restricted or impacted outside of the construction period. The Head of Service - Roads and Transportation and Transport Scotland do not object to the proposed development.

The advice from the Head of Service – Roads and Transportation regarding the width of the access, maintaining sightlines, paving the first 10m of the proposed access can be addressed by planning conditions should planning permission be granted. Transport Scotland did not request specific conditions to be added but did request that consideration be given to implications for the trunk road network should the trunk road network be impacted. This includes consideration of temporary measures and mitigation.

There may be some traffic impacts on the local roads network during the construction period. However, the construction phase is limited in duration, and the construction is relatively limited, with much of the activity relating to the delivery of battery storage units. Subject to appropriate controls such as a Construction Traffic Management Plan, which can be addressed by a condition, the impacts are capable of being mitigated.

The proposal is therefore considered to be acceptable under Policy 11 e) vi) of National Planning Framework 4 and under the terms of Policy 11 of the adopted Local Development Plan as well as Policy 12 of the proposed Local Development Plan.

Cumulative Impacts

Surrounding uses include individual residential properties, farm holdings and agricultural business premises. The site is only 1km from the settlement boundary of Greenock. Areas such as this at the fringe of urban areas often incorporate a variety of land uses, including electricity infrastructure, waste recycling or waste water management, which are often located close to the boundaries of settlements for operational reasons. In conjunction with the existing buildings and structures in the surrounding area, the limited scale of the proposed development is such that there is no significant cumulative effects that alters the wider landscape character. It should be added that the landscape at this location is not considered to be of special value, is not a recognised designation or highly distinctive. Localised landscape impacts as a result of renewable energy developments are considered to be generally acceptable under NPF4.

Core Paths

Turning to impacts on recreational routes, the development is adjacent to the Ravenscraig to Howford Glen Core Path. Although the proposed development will be visible to core path users, the visual impact is considered to be short lived and transient. The section of the core path adjacent to the development is only a minor component of the entire route and would not significantly impact on the enjoyment of users.

Regarding access for users of the core path, operation of the development will only require minor vehicle movements and occasional site access. Construction of the development will require more extensive use of Flatterton Road although this will be limited to the 9 month construction period. This is not a permanent change to the use of the core path and the long term use is not affected.

Landscape changes that may include industrial components are likely along core paths, especially in the urban fringe. This also includes electricity infrastructure and civil infrastructure such as waste water treatment, which are commonly evident around the periphery of urban areas.

As such the proposal is considered acceptable under Policy 11 e) iii) of National Planning Framework 4 and under the terms of Policy 38 of the adopted Local Development Plan as well as Policy 36 of the proposed Local Development Plan.

Flood Risk

The site is adjacent to a watercourse and on SEPA's Flood Maps the area at flood risk is generally within the boundaries of the watercourse. SEPA considers essential infrastructure developments of this type to be a relatively low risk land use in that they can be designed to remain operational if the land floods, and they are unlikely to increase flood risk to other people. SEPA has advised that the absence of land raising will ensure that the flood plain is not diminished in capacity by the development. It should be noted that consultees are aware that evidence of some localised flooding around the burn and glen (to the south west of the development area) has been identified. Consultees are satisfied that there is no significant additional risk as a result of this development.

In terms of Policy 9 of the adopted LDP and Policy 10 of the proposed LDP the development is proposed to have a Sustainable Urban Drainage System (SUDS) in order to manage the surface

water run-off from the site. The Head of Service - Roads and Transportation has not objected to the proposal in terms of flooding or drainage. The provision of further drainage details can be addressed by a planning condition. The proposal complies with Policy 8 of the adopted LDP and Policy 9 of the proposed LDP as well as Policy 9 of the adopted LDP and Policy 10 of the proposed LDP in respect of flood risk and drainage respectively.

Private Water Supplies (PWS)

The applicant has stated that the surface waters from the development discharge into a tributary of the Spango Burn, south of the identified PWS. There are also elevational differences of around 30m between the Spango Burn and the PWS. Furthermore, the proposed SUDS pond filters silt and pollutants prior to discharge. The Public Protection Manager generally concurs with the applicant and has identified the same PWS abstraction at Wellyard and a further upland source at Leitchland. Neither sources are considered at significant risk from the proposed development. The nature of the development is such that deep excavations are generally avoided. Although the risk to private water supplies is low, the proximity of the development to potential abstraction points is such that a planning condition is necessary requiring monitoring of sampling locations and provide mitigation, if impacts are identified. There is no significant concern regarding the integrity of any private water supplies. As detailed, a number of factors point to the conclusion that the development is physically disassociated from the abstraction points of any private water supplies. The nature of the development does not involve construction techniques that add further significant risks to private water. However, given the importance of maintaining potable water, it is prudent to protect the supplies by the attachment of a condition to ensure even the low risk of impact is mitigated.

Cultural Assets and Archaeology

There is an absence of historic environment assets (i.e. archaeology, Scheduled Monuments, Listed Buildings, Conservation Areas and Gardens and Designed Landscapes) in the vicinity of the proposed development. The Overton reservoirs and channels associated with the Greenock Cut viaduct and core path are scheduled monuments at a distance of approximately 1.5km from the proposed site. The Ardgowan Estate is a Garden and Designed Landscape 2km to the south west of the site.

The Flatterton Farmstead may be buried in the vicinity of the proposed site and the Flatterton Aircraft Battery is located to the north of the site. No SMR (Scheduled Monument) is close enough to the site for the setting to be adversely affected. There is however enough evidence of human activity to suggest that buried archaeological remains may be present within the site itself. Should planning permission be granted application an archaeological watching brief can be addressed by a planning condition.

It is considered that the distance from listed buildings, scheduled monuments and conservation areas are sufficient to ensure that there are no unacceptable impacts on their settings. It should be noted that the longer distance views of the proposed development are not considered significant. The proposed development would form a visible but not overbearing landscape change.

It is considered that the proposal is acceptable under the terms of Policy 7 of National Planning Framework 4 and Policy 7 of both the adopted and proposed Local Development Plans.

Noise Impact

Noise impacts from this type of development are a result of operation of the transformer, inverter(s) and air conditioning within the battery containers. A Noise Impact Assessment has been submitted with measurements taken from five noise sensitive locations. The report concludes that the perimeter fence should have acoustic absorption qualities to limit noise emissions during periods where operations are at a maximum.

There are two properties that have a financial interest in the development at Flatterton Farm and Burneven, approved under 18/0001/IC as an agricultural worker's dwelling for Flatterton. Guidance in this respect indicates that consideration should be given to allowing a higher tolerance of noise impacts on properties that are financially involved in a proposed development. The proposed development would result in a high noise impact for one financially involved property which is Flatterton Farm. It is therefore acceptable for this property to experience a greater noise impact than would be the case for a property unrelated to the proposal. Furthermore, night time and interior dB levels are satisfactory for all receptors. The applicant has proposed acoustic fencing around the north-east boundary.

The Public Protection Manger has not indicated any concerns regarding the proposed development in terms of noise impact. The proposal is therefore acceptable in this regard under Policy 11 e) i) of National Planning Framework 4 and under the quality of being "Safe and Pleasant in Policy 1 of both the adopted and proposed Local Development Plans. The acoustic fencing can be addressed by a planning condition.

Site Decommissioning and Restoration

Policy 11 e) of National Planning Framework 4 requires demonstration of how impacts are to be addressed including proposals for the decommissioning of developments, including ancillary infrastructure, and site restoration.

The applicant has indicated that the intended lifetime of the proposal is 40 years after which the facility will be decommissioned, and the land restored to its former state. No other information regarding this has been submitted. Notwithstanding, given the type of development and its location, it is considered that decommissioning and site restoration is necessary at the end of the lifetime of the development. It is considered that a planning condition is necessary to ensure sufficient funds are available to decommission and restore the site. If the developer was to go out of business with unfinished works potentially being left this can be safeguarded by ensuring that a bond or other financial provision is to put in place to cover such an eventuality. The bond or other financial provision would address reinstatement works both in the event of a developer failing or being unable to complete restoration works together with any failure in the aftercare arrangements associated with the site restoration.

In the event that the development fails to export electricity to the grid for a continuous period of 12 months it will be considered to have become redundant and the components of the development removed and the site restored. It is considered necessary for this to be addressed by a planning condition.

Consultation Responses

With regard to other points made in consultation responses the Head of Service – Roads and Transportation advised that a Section 56 agreement would be required for alterations to the road network. This can be an advisory note should planning permission be granted.

The Public Protection Manager advises that all external lighting should comply with Scottish Government Guidance, construction regulations adhered to, construction design should consider the nesting of gulls, surface water should be collected and disposed of properly during construction and operational phases. These matters can be advisory notes should planning permission be granted.

Representations

With regard to the objections that have been received and have not been considered above the following comments are made.

In terms of the application not being widely publicised the notification and advertisement of the application complies the requirements of the Town and Country Planning (Development

Management Procedure) (Scotland) Regulations 2013. As there are no premises on neighbouring land within 20m of the boundary of the application site the application was advertised in the local press.

With regards to health and safety impacts, it is considered that health and safety risks are commensurate with a development of this type, and are not considered unusual, excessive or unacceptable. The operator will require to comply with health and safety at work legislation which also includes good practice related to the construction phase.

In terms of the request to consult directly with specific residents and/or areas, there is no requirement to notify specific residents other than required by the Town and Country Planning (Development Management Procedure) (Scotland) Regulations 2013.

Regarding the lack of community benefits, the provision of community benefits is not a material consideration in assessing a proposed development. The Scottish Government recommends that applicants consider the provision of community benefits resultant from the generation of renewable energy. This proposal does not involve the generation of energy and does not require community benefits in this instance.

With regard to the comments pertaining to profiteering from the green belt, this is not a material consideration.

In terms of fire risk, this is not a material planning consideration. The Scottish Fire and Rescue Service has been consulted and after their assessment provided no comments on the application.

In terms of impacts on the future of Inverclyde and tourism, there is no evidence to suggest that the location, construction or operation of the development would have wider and negative impacts on the local authority area.

Regarding the comments that the development should be close to a major road, the location of the development is considered acceptable in relation to the impacts on the local and wider road network.

With regard to potential bacterial effects from standing water in SUDS ponds, the risk of stagnant or contaminated water in SUDS is considered low, particularly where the scheme is properly designed and managed.

A further comment relates to the impact on the right of way. A right of Way is located outwith the development site (designated as route 4 from Lunderston Bay to Braeside Farm via Flatterton) and is not considered to be adversely impacted by the proposed development. The right of way commences at Howford Glen, to the immediate south west of the site.

In terms of surface water run off occurring in conjunction with potential reuse of a hydro scheme, the potential reuse of a dormant hydro scheme is not a material consideration.

Conclusion

It is acknowledged that the development is within the green belt. The proposal represents change at this location however this has to be balanced against development of this type being required to store and distribute renewable energy produced to contribute towards the net zero targets. It should be noted the site is not in a remote rural location and there are other forms of energy development in the wider area.

The proposed site is approximately 1.8km from the Spango Valley Sub-Station and adjacent to the settlement boundary of Greenock. Therefore the requirement for the site to be accessible would be

met. The visual and landscape impacts as a result of the development are localised, and benefit from some terrain shielding, especially from the A78.

There will be landscape and visual impacts associated with the proposal particularly until the proposed landscape planting becomes established and matures. These impacts are however limited and considered acceptable in the context of the benefits that the proposal will bring in terms of contributing to energy storage. The proposal will support the resilience of the electricity network and contribute to sustainable development, providing for greater and more efficient use of renewable energy generation in the electricity system, and in this regard, it will contribute to greenhouse gas emission reduction targets.

The benefits of the proposed development are considered to outweigh any adverse impacts. The proposal is therefore considered to be acceptable when assessed against the relevant policies of National Planning Framework 4, the adopted Inverclyde Local Development Plan as well as the proposed Inverclyde Local Development Plan. There are no material considerations that outweigh the policies.

RECOMMENDATION

That the application be granted subject to the following conditions:

1. The development to which this permission relates must be begun within 3 years from the date of this permission.
2. The battery energy storage facility hereby approved shall not exceed 49.9MW in generating capacity.
3. Development shall not commence until the applicant/developer has submitted details of private water sampling locations, background baseline monitoring details and a timescale for reporting all for the approval in writing by the Planning Authority. Should the sampling thereafter indicate that there have been adverse impacts on the Private Water Supply, a scheme of mitigation shall be submitted to and approved in writing by the Planning Authority and shall take immediate effect upon such approval.
4. Development shall not commence unless and until a finalised Landscaping Plan has been submitted to and received the written approval of the Planning Authority. The Landscaping Plan shall include, but shall not necessarily be limited to:-
 - (i) Details, including plans, sufficient to identify the location of all proposed landscape planting on site;
 - (ii) Details of the species composition and layout of proposed landscape planting (including the use of semi-mature trees where practicable), evidencing the proposals will be capable of providing effective screening of the Development;
 - (iii) Details of the management of the landscape planting to ensure it establishes and is maintained throughout the lifetime of the Development, providing effective screening of the Development, and
 - (iv) Details of the timetable for the implementation of the planting detailed within the Landscaping Plan.

The approved Landscaping Plan shall thereafter be implemented in full in accordance with the approved plans and in line with the approved timetable, unless otherwise agreed in writing in advance by the Planning Authority.

5. Development shall not commence unless and until a Construction Traffic Management Plan (CTMP) has been submitted to and received the written approval of the Planning Authority, in consultation with Roads and Transportation and Transport Scotland. The CTMP shall include (but shall not necessarily be limited to details of:

- (i) The routing of all traffic associated with the development on the local road network, including on the trunk road network to access the site, and measures to ensure that the specified routes are adhered to including monitoring procedures; Construction traffic management and mitigation measures and timings thereof; permits, junction widening, routes and volumes for imported materials, and any associated signage;
- (ii) Mitigation and traffic management measures to ensure that construction traffic is managed to reduce the impacts on public roads, drainage, structures and other street furniture and reduce the impact on the road condition;
- (iii) Traffic management and site protocol, including details of measures to prevent loose or deleterious material being deposited on the local road network including wheel cleaning and lorry sheeting facilities and measures to clean the site entrances and the adjacent local road network if required;
- (iv) Details of any additional signing or temporary traffic control measures deemed necessary due to the size or length of loads being delivered, such measures must be undertaken by a recognised Quality Assured traffic management consultant;
- (v) Any weight restrictions on the delivery route shall be reported and complied with during usage of the routes;
- (vi) Any temporary site access signage and temporary traffic management measures for the construction of the site access.

The CTMP approved shall thereafter be implemented in full and adhered to at all times unless otherwise agreed in advance in writing by the Planning Authority.

6. For the avoidance of doubt parking spaces in the site shall be a minimum of 2.5m by 5.0m with a minimum of 6m aisle spacing.

7. For the avoidance of doubt visibility splays of 2.4m x 90.0m x 1.05m shall be maintained at all times at the vehicular access with Flatterton Road as shown on drawing 005I_A Figure 5.3 Rev A. This should include the illustrated hedgerow realignment to ensure clear visibility.

8. For the avoidance of doubt: the vehicular access into the site shall be fully paved for a minimum of 10m; the gradient of the access shall not exceed 10%; and the minimum width of the access shall be 4.8m for the first 10m.

9. Development shall not commence unless and until full details, including location, dimensions and specification of the acoustic fences, including their noise attenuation properties, have been submitted to and approved in writing by the Planning Authority. The acoustic fences shall thereafter be installed on site before the first commissioning of the development and shall remain in position for the lifetime of the development in accordance with the details approved unless otherwise agreed in writing in advance by the Planning Authority.

10. In the event of any suspected contamination or Japanese Knotweed being discovered, site works shall cease with immediate effect and the matter brought to the attention of the Planning Authority: thereafter, site works may not recommence until a Remediation Scheme (to be submitted for the prior written approval of the Planning Authority) has been completed to the satisfaction of the Planning Authority in writing.

11. Development shall not commence unless and until full details of all site lighting have been submitted to and approved in writing by the Planning Authority. The details shall include but shall not necessarily be limited to:

- (i) The location of all temporary and permanent site lighting, and full details including elevation plans of the lighting columns / units proposed;
- (ii) Lux levels of the temporary and permanent site lighting and details of the lighting unit models, noting all permanent lighting units will require to be motion-activated in nature, and

(iii) Measures, including directional positions of lighting, to reduce light pollution / spillage in the surrounding area.

For the avoidance of doubt, all permanent site lighting shall be motion-activated in nature and the site shall not be otherwise lit during hours of darkness, save for being activated by movement within the site.

The lighting shall be implemented on site in accordance with the approved details.

12. Development shall not commence unless and until details and specifications of all development infrastructure has been submitted to and approved in writing by the Planning Authority. These details shall include but shall not necessarily be limited to:

- (i) Dimensions of all infrastructure components, buildings and structures forming the development;
- (ii) Details of the make and model of infrastructure units to be installed on site, including sound level output where relevant, and
- (iii) The external colour and/or finish of all development infrastructure.

The development infrastructure shall thereafter be installed in accordance with the details approved above and maintained in the approved colour, free of rust and discolouration for the lifetime of the development.

13. All vegetation clearance, tree felling, soil stripping and construction works shall be undertaken out with the breeding bird season (March to August inclusive). Where this is not possible, nesting/breeding bird surveys shall be undertaken by an appropriately qualified ornithologist, of any areas to be the subject of vegetation clearance, tree felling, soil stripping or construction works and the results of the surveys shall be used to produce a Bird Protection Plan (BPP) to be submitted for the written approval of the Planning Authority prior to any such activities taking place on site. The BPP shall include full details of the surveys carried out and their results, all necessary mitigation and operational protocols appropriate to the species identified during the surveys, including any appropriate buffers to prevent or minimise disturbance of birds during vegetation clearance, tree felling, soil stripping and construction works and any post-construction restoration. The Bird Protection Plan approved above shall thereafter be implemented in full in accordance with the approved details during all vegetation clearance, tree felling, soil stripping and construction works, and post-construction restoration works.

14. Not more than three months prior to the commencement of development, Ecology Pre-commencement Surveys shall be conducted to determine the presence or otherwise of bats, otters, badgers, red squirrels, reptiles and other protected species which may be present on site. Details of the surveys and the results of the surveys shall be submitted to the Planning Authority prior to the commencement of development. Where the surveys required above indicate that any protected species are present on site or could be affected by the Development, Species Protection Plans, specific to each relevant species, detailing all mitigation required shall be submitted for the written approval of the Planning Authority, prior to the commencement of development. Any Species Protection Plans approved above shall be implemented in full as approved during all construction works.

15. Development shall not commence until a detailed decommissioning and restoration scheme has been submitted to and approved in writing by the Planning Authority. The scheme shall detail the measures for the decommissioning and removal of the containers, batteries and associated ancillary infrastructure and restoration of the site thereafter to restore the site to its former condition or such other condition as agreed in writing by the Planning Authority. The scheme shall cover (but shall not necessarily be limited to the following matters:

- (i) works for the removal of all containers, batteries and ancillary infrastructure;
- (ii) environmental management provisions to be implemented throughout the decommissioning and restoration period;

- (iii) details of the restoration works and timetable for all decommissioning and restoration works, and
- (iv) details of aftercare provisions to ensure the restoration has been successful.

No later than 6 months prior to the expiry of this consent, or intended decommissioning of the development, whichever is earlier, the containers, batteries and ancillary infrastructure will be decommissioned and removed from site and restoration undertaken all in accordance with the decommissioning and restoration scheme approved above.

16. For the avoidance of doubt if the battery storage facility does not import or export electricity to and from the grid for a continuous period of 12 months the applicant/developer shall, no later than the date of expiration of the 12 months period, submit a scheme to the Planning Authority setting out how the development is to be removed from the site and fully restored. Thereafter the approved scheme shall be implemented within 12 months of the date of approval unless otherwise agreed in writing by the Planning Authority.

17. Development shall not commence unless the applicant/developer has delivered a bond or other form of financial guarantee in terms acceptable to the Planning Authority which secures the cost of performance of all decommissioning, restoration and aftercare obligations contained in Condition 15 to the Planning Authority. The financial guarantee shall thereafter be maintained in favour of the Planning Authority until the date of completion of all restoration and aftercare obligations. The value of the financial guarantee shall be determined by a suitably qualified independent professional as being sufficient to meet the costs of all decommissioning, restoration and aftercare obligations contained in Condition 15. The value of the financial guarantee shall be reviewed by a suitably qualified independent professional no less than every five years and increased or decreased to take account of any variation in costs of compliance with restoration and aftercare obligations and best practice prevailing at the time of each review.

18. Development shall not commence until final details of the external appearance, dimensions and finishing and surface materials of the temporary construction compound and parking areas and any fencing, lighting or other ancillary structures associated with the temporary construction compound have been submitted to and approved in writing by the Planning Authority.

The temporary construction compound and its associated ancillary infrastructure shall be implemented in accordance with the details approved above unless otherwise agreed in writing by the Planning Authority.

19. Noise from or associated with the completed development (the buildings and fixed plant) shall not give rise to a noise level, assessed with windows closed, within any dwelling or noise sensitive building in excess of that equivalent to Noise Rating Curve 35 between 0700 and 2200, and Noise Rating Curve 25 at all other times.

20. Development shall not commence until details of the proposed surface water drainage have been submitted to and approved in writing by the Planning Authority. Following approval, the surface water drainage shall be fully implemented on site.

21. Development within the site as outlined in red on the approved plan shall not commence unless and until the developer has secured the implementation of a programme of archaeological works in accordance with a written scheme of investigation which has been submitted by the applicant and approved by the Planning Authority. Thereafter the developer shall ensure that the programme of archaeological works is fully implemented and that all recording and recovery of archaeological resources within the development site is undertaken.

Thereafter the Developer shall ensure that the programme of archaeological works, approved above is fully implemented and that all recording and recovery of archaeological resources within the development site is undertaken in accordance with the approved scheme.

Reasons:

1. To comply with Section 58 of the Town and Country Planning (Scotland) Act 1997 (as amended).
2. In order to ensure the development complies with the development consented and electricity generation exceeding this capacity requires consent under different legislation.
3. To protect the source and quality of private water supplies.
4. To ensure planting undertaken will provide effective screening of the development and will be maintained in an effective condition for the lifetime of the development, in the interests of visual amenity
5. In the interests of road safety and to ensure that impacts on routes and communities are adequately assessed and used to inform appropriate mitigation measures.
6. To ensure parking space dimensions meet national standards.
7. In the interests of road safety.
8. To prevent loose driveway material being spilled onto the road and in the interests of residential amenity and road safety.
9. To ensure appropriate mitigation is secured and implemented in the interests of residential amenity.
10. To ensure that any contamination and Japanese Knotweed concerns are managed appropriately.
11. To ensure appropriate lighting is operated on site with mitigation to protect amenity and in the interests of ecology and the environment.
12. To ensure the colour of all built elements within the site is reflective of the landscape setting in the interests of visual amenity.
13. To ensure protection of the environment of breeding birds
14. To ensure that adequate ecological protection is implemented, in the interests of minimising adverse effects on the species.
15. To ensure the satisfactory restoration of the site in a suitable and environmentally acceptable manner, in the interests of safety, amenity and environmental protection.
16. In the interests of maintaining control of the development should it become redundant and to ensure that the site is restored.
17. To ensure that sufficient funds are in place to cover the completion of the restoration works together with any failure of the restoration works or in the aftercare arrangements associated with the site restoration and the decommissioning of the above ground infrastructure in the interests of protecting and minimising the impact on the environment and surrounding area.
18. To ensure the temporary construction compound is constructed in accordance with the approved plans.
19. To protect the occupiers of dwellings or noise sensitive buildings from excessive noise.
20. To avoid impacts on the water environment and mitigate flood risk and runoff.

21. To ensure archaeological interests that may exist or be discovered on the site are not destroyed or disturbed without being recorded.

Stuart Jamieson
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Local Government (Access to Information) Act 1985 – Background Papers. For further information please contact Colin Lamond on 01475 712422.