

APPENDIX 2 – CONSULTATION RESPONSES

Your Ref:
My Ref: 210470/1
Contact: Andrew Mackenzie
Telephone: 0141 618 7889
Fax: 0141 618 7935
Date: 17 April 2014



Fraser Blackwood
URS Infrastructure & Environment UK Limited
23 Chester Street
Edinburgh
EH3 7EN

Dear Mr Blackwood,

***PROPOSED SECTION 37 APPLICATION FOR 132KV OVERHEAD LINE
DIVERSION WORKS - ELDESLIE TO JOHNSTONE ROUTE***

Thank you for your consultation in relation to the proposed relocation of the overhead lines of the above route at Burnbrae Road/Lyon Road near Linwood. Please accept my apologies for the delay in issuing you with a response.

At this early stage in the process, Renfrewshire Council would like to take this opportunity to outline some reservations with the proposals. The pylons, both as existing and proposed, run through an area which is identified in the Development Plan as an important local industrial area and as one of Renfrewshire's Economic Investment Areas. Land at this location is set out to support a range, type and scale of uses and is considered an important site due to the close proximity to transport links.

The Council has some concerns that the pylons could potentially deter the future development of sites in this area. It is also worth noting that there are planning permissions in place for much of the area within which the new pylons would be located.

Regarding the specific locations of the individual pylons/overhead lines:

Pylon AU8R - Planning permission was granted in 2009 for an anaerobic digestion facility, with other subsequent planning applications having also been approved for other parts of the site. The proposed location of the pylon would appear to be in the heart of where the proposed facility would be located.

Pylon AU7R – This pylon appears to be proposed in a prominent location to the north of Burnbrae Road at, or close to, a potential site frontage and/or access point into the site to the north of the road. Planning permission has been granted for a long stay car park which would be located to the east of the North Patrick Water and would be accessed from the north. This also includes consent for some land engineering works to the west of the Old Patrick Water, not far from the proposed location of the pylon, in order to provide material to build flood defences to protect the site to the east from



Director of Development and Housing Services: Mary Crearie
Renfrewshire House, Cotton Street, Paisley PA1 1LL
www.renfrewshire.gov.uk



potential flooding. Outline planning permission has also been granted for a hotel / office development at the north east of this site. Notwithstanding, there is still scope for further development at the south end of this area; however, the location of a pylon and overhead lines along the southern frontage could present challenges for the future development of this site.

Pylons AU6R and AU5R – These would both appear to be on the edge of an existing long stay car park. We would recommend caution regarding the siting of these, with consideration given to any potential future redevelopment of this site.

It would be appreciated if the Council's comments could be taken into consideration so that any new apparatus will not deter, or indeed prevent, future development in the area.

I hope the above information is of assistance to you in the meantime and I look forward to further consultation on the above in due course. Should you wish to discuss any of the above in the meantime, please do not hesitate to contact me on 0141 618 7889.

Yours sincerely



Andrew Mackenzie
Assistant Planning Officer



Director of Development and Housing Services: Mary Crearie
Renfrewshire House, Cotton Street, Paisley PA1 1LL
www.renfrewshire.gov.uk



Our ref: PCS/132460
Your ref: 47069895/001

Fraser Blackwood
URS Infrastructure & Environment UK Limited
23 Chester St,
Edinburgh
EH3 7EN

If telephoning ask for:
Nicki Dunn

15 April 2014

By email only to: fraser.blackwood@urs.com

Dear Fraser

Pre-planning enquiry
Proposed Section 37 Application for 132kv Overhead Line Diversion Works on
Elderslie to Johnstone Route
Elderslie to Johnstone

Thank you for consulting SEPA on the above proposal

We welcome pre-application engagement, but please be aware that our advice at this stage is based on emerging proposals and we cannot rule out potential further information requests as the project develops. Similarly, our advice is given without prejudice to our formal planning response, or any decision made on elements of the proposal regulated by us, which may take into account factors not considered at the pre-application or planning stage. We have no concerns regarding the principle of this development proposal.

1. Flood Risk

- 1.1 If formally consulted through the planning process on the proposed development we would be unlikely to object on flood risk grounds based on the information supplied with this consultation. Notwithstanding this we would expect Renfrewshire Council to undertake their responsibilities as the Flood Prevention Authority.
- 1.2 Our pre-application advice relies on the accuracy and completeness of the information supplied with this consultation. Should finalised development proposals differ in any future planning application we reserve the right to alter our position if we are of the opinion that such proposals would not meet with the principles of Scottish Planning Policy.
- 1.3 We have reviewed the information provided in this consultation and note that some of the towers are either adjacent to or within the medium likelihood (0.5% annual probability or 1 in 200 year) flood extent of the SEPA Flood Map, and may therefore be at medium to high risk of flooding. We also note that the proposed diversion works to the route will result in some towers currently outwith the extent, being moved either within or adjacent to the medium likelihood flood extent of the SEPA Flood Map.



Chairman
David Sigsworth
Chief Executive
James Curran

Angus Smith Building
6 Parklands Avenue, Eurocentral,
Holytown, North Lanarkshire ML1 4WQ
tel 01698 839000 fax 01698 738155
www.sepa.org.uk

- 1.4 Scottish Planning Policy states in paragraph 203, that “For planning purposes the functional flood plain will generally have a greater than 0.5% (1:200) probability of flooding in any year. Development on the functional flood plain will not only be at risk itself, but will add to the risk elsewhere.” Built development should not therefore take place on the functional flood plain.
- 1.5 Based on the information provided we consider that the proposed diversion works fall into the vulnerability category of “Essential Infrastructure” and necessarily have to be located within/adjacent to the indicative flood envelope for operational reasons and are viewed as an exception within Scottish Planning Policy (SPP). Furthermore as the diversion involves the re-routing of existing towers with no additional development planned, there will be minimal issues in terms of negative impacts to floodplain storage and conveyance at this location. Therefore we have no objection to the proposed development on flood risk grounds.
- 1.6 We recommend that contact is made with the Flood Prevention Authority so that they may satisfy themselves regarding this issue. If you require further input from us, additional information would be necessary to enable us to comment upon the flood risk at the application site. The applicant should also be made aware of the potential residual risk to their assets and adopt appropriate management measures where feasible.
- 1.7 The SEPA Flood Maps have been produced following a consistent, nationally-applied methodology for catchment areas equal to or greater than 3km² using a Digital Terrain Model (DTM) to define river cross-sections and low-lying coastal land. The maps are indicative and designed to be used as a strategic tool to assess flood risk at the community level and to support planning policy and flood risk management in Scotland. For further information please visit http://www.sepa.org.uk/flooding/flood_maps.aspx.
- 1.8 We refer you to the document entitled: “*Technical Flood Risk Guidance for Stakeholders*”. This document provides generic requirements for undertaking Flood Risk Assessments and can be downloaded from www.sepa.org.uk/flooding/planning_flooding.aspx. Please note that this document should be read in conjunction Policy 41 (Part2).
- 1.9 Please note that we are reliant on the accuracy and completeness of any information supplied by the applicant in undertaking our review, and can take no responsibility for incorrect data or interpretation made by the authors.
- 1.10 The flood advice contained in this letter is supplied to you by SEPA under the Environmental Information (Scotland) Regulations 2004 in response to your request for information under these regulations.

2. Engineering Works

- 2.1 You should contact our local operations team regarding any proposals to undertake works within 10m of the bank or bed of the watercourse as this may constitute an activity which requires to be authorised under The Water Environment (Controlled Activities) (Scotland) Regulations 2011 (as amended) (CAR).

3. Regulatory advice for the applicant

- 3.1 Details of regulatory requirements and good practice advice for the applicant can be found on our website at www.sepa.org.uk/planning.aspx. If you are unable to find the advice you need for a specific regulatory matter, please contact a member of the operations team in your local SEPA office at:

Angus Smith Building
6 Parklands Avenue
Eurocentral
Holytown
North Lanarkshire
ML1 4WQ

Tel: 01698 839000

If you have any queries relating to this letter, please contact me by telephone on 01698 839000 or e-mail at planning.sw@sepa.org.uk.

Yours

Nicki Dunn
Planning Officer
Planning Service

Disclaimer

This advice is given without prejudice to any decision made on elements of the proposal regulated by us, as such a decision may take into account factors not considered at the planning stage. We prefer all the technical information required for any SEPA consents to be submitted at the same time as the planning application. However, we consider it to be at the applicant's commercial risk if any significant changes required during the regulatory stage necessitate a further planning application and/or neighbour notification or advertising. We have relied on the accuracy and completeness of the information supplied to us in providing the above advice and can take no responsibility for incorrect data or interpretation, or omissions, in such information. If we have not referred to a particular issue in our response, it should not be assumed that there is no impact associated with that issue. If you did not specifically request advice on flood risk, then advice will not have been provided on this issue. Further information on our consultation arrangements generally can be found in [How and when to consult SEPA](#), and on flood risk specifically in the [SEPA-Planning Authority Protocol](#).

Blackwood, Fraser

From: John Shelton <John.Shelton@snh.gov.uk>
Sent: 03 April 2014 11:48
To: Blackwood, Fraser
Subject: Proposed Section 37 Application for 132kv Overhead Line Diversion Works on Elderslie to Johnstone Route

Fraser,

The Electricity Act 1989

Pre-Application Consultation - Proposed Section 37 Application for 132kv Overhead Line Diversion Works on Elderslie to Johnstone Route

Thank you for your consultation on the above application, dated 24 March 2014.

SNH POSITION

We have no specific comments to make in relation to this plan.

This does not mean that there are no natural heritage interests within the site or its immediate surroundings. However in this instance, we would expect you to be able to identify and address any natural heritage impacts and seek opportunities for enhancement or mitigation without further reference to SNH at this stage.

SOURCES OF ADVICE

You may find the SNHi section of our website helpful in identifying natural heritage interests in and around the site. This can be accessed at <http://www.snh.gov.uk/publications-data-and-research/snhi-information-service/>. In addition, guidance on considering the impacts of a proposal on protected species can be found at <http://www.snh.gov.uk/protecting-scotlands-nature/protected-species/your-responsibilities/>

If you have any queries relating to this response, please do not hesitate to get in touch

Regards

John Shelton
Operations Officer - Strathclyde & Ayrshire
Scottish Natural Heritage, Clydebank
tel: 0141 951 4488
Fax: 0141 951 8948

Scotland welcomes the world in the **Year of Homecoming Scotland 2014!**

The year-long programme of events will celebrate the very best of Scotland's food and drink, active and natural resources as well as our creativity, culture and ancestral heritage.

homecomingscotland.com



HISTORIC SCOTLAND
ALBA AOSMHOR

Mr Fraser Blackwood
URS Infrastructure & Environment UK Limited
23 Chester Street
EDINBURGH
EH3 7EN

Longmore House
Salisbury Place
Edinburgh
EH9 1SH

Direct Line: 0131 668 8798
Direct Fax: 0131 668 8722
Switchboard: 0131 668 8600
Judith.Roebuck@scotland.gsi.gov.uk

Our ref: AMN/2/SU
Our Case ID: 201307794
Your ref: 47069895/003

01 April 2014

Dear Mr Blackwood

**THE ELECTRICITY WORKS (ENVIRONMENTAL IMPACT ASSESSMENT)
(SCOTLAND) REGULATIONS 2000
132kv Overhead Line Diversion Works on Elderslie to Johnstone Route**

Thank you for consulting Historic Scotland regarding the above.

Historic Scotland's remit is to comment where proposals might impact upon the fabric and/or setting of designated historic features, such as Scheduled Monuments, A Listed Buildings and Sites on the Inventories of Gardens and Designed Landscapes and Historic Battlefields.

From the information provided in support of this application it would appear that there are no such designated features in this area.

However, these proposals may have implications for unscheduled archaeology. This is the responsibility of the local authority's archaeological advisors and I recommend that you consult them regarding these proposals if you have not done so already

Yours sincerely

Judith Roebuck
Senior Heritage Management Officer