

Chapter 5

Planning Policy Context

Introduction

5.1 This chapter provides an overview of the planning and regulatory framework for consideration of the development consent applications¹ for the EDM Project, and the planning consultation undertaken to date. It also details the national and local planning policy and guidance taken into account when considering the likely significant environmental effects of the EDM Project.

5.2 This chapter refers in detail to the National Planning Framework 3 (NPF3), Scottish Planning Policy 2014, particularly to the energy transmission and EIA topic related provisions contained therein. Consideration is also afforded to the relevant aims and objectives of the statutory development plans, as this constitutes an important aspect of the overall policy framework and identifies the development plan policies (both adopted and emerging Local Development Plans (LDPs)) of relevance to the EDM Project by EIA topic area. The full wording of relevant development plan policies is provided.

5.3 The chapter also includes a description of other material planning considerations which include supplementary planning guidance and national guidance and advice (summarised in a table).

5.4 A final section on committed development² in proximity to components to the EDM Project is also included at the end of the chapter.

5.5 It is important to note that this chapter does not include an assessment of the EDM Project's accordance with relevant planning policy and other material considerations. The Scottish Ministers as competent authority will consider the question of accordance in making their determinations on the development consent applications³ as well as the discharge of the duties regarding the preservation of amenity etc. under Schedule 9 of the Electricity Act 1989 as set out in detail in **Chapter 1: Introduction**.

The Planning and Regulatory Framework

5.6 Under section 37 of the Electricity Act 1989 ('the 1989 Act'), consent is required from the Scottish Ministers to install (and keep installed) an electric line exceeding 20kV above ground. At the point of submission of the application for section 37 consent required for the New 132kV OHL SPEN will also request that Scottish Ministers direct that planning permission be deemed to be granted under section 57(2) of the Town and Country Planning (Scotland) Act 1997 (the 1997 Act) for the New 132kV OHL and ancillary development as described below:

- The construction of a new 16.95km 132kV single circuit wood pole (Trident) OHL between the Erskine and Devol Moor substations;
- The decommissioning of the existing 16.5km 132kV double circuit steel tower (PL1) between the Erskine and Devol Moor substations following the commissioning of the New 132kV OHL.
- Temporary stone access tracks for construction and decommissioning in specified areas (refer to **Chapter 4**).

5.7 Reference should be made to the detailed EDM Project description provided in **Chapter 4: Project Description**.

5.8 There is a distinction to be drawn between the grant of an application for section 37 consent and a direction that planning permission is deemed to be granted under section 57(2) of the 1997 Act. Deemed planning permission can only be given upon the granting of consent under section 37 of the 1989 Act. It is a matter for the discretion of the Scottish Ministers as to whether they consider it appropriate to make such a direction. The decision to grant section 37 consent is the principal decision.

5.9 With applications for section 37 consent and deemed planning permission, there is no 'primacy' of the development plan. The provisions of section 25 of the 1997 Act do not apply. However, the development plan is a relevant consideration to the decisions along with considerations such as those identified under Schedule 9 of the 1989 Act, national policy, the environmental effects of proposals and the views of consultees.

5.10 Development plan policies do not specifically address a development like the EDM Project. The weight to be afforded to the development plan in the decision-making process must therefore be considered in this context and the specific considerations arising from Schedule 9 to the 1989 Act. The duties imposed by Schedule 9 are addressed in detail in **Chapter 1: Introduction**.

5.11 Consideration of the applications will involve striking a balance between the need for the EDM Project, technical and economic considerations and the mitigation of likely environmental effects.

5.12 As demonstrated in this EIA Report, SPEN has sought to conserve, where possible, the natural heritage and features of interest, and where environmental effects are envisaged, mitigation is proposed to seek to further reduce residual adverse effects. In this regard, SPEN considers that it has fulfilled its duties under Schedule 9 to the 1989 Act.

5.13 The EDM Project is split between the administrative areas of two Local Authorities, being Inverclyde Council and Renfrewshire Council. In this regard, the relevant development plans comprise the following:

- Clydeplan Strategic Development Plan 2017;
- Inverclyde LDP 2019; and
- Renfrewshire LDP 2014.

5.14 The Renfrewshire LDP 2 Proposed Plan 2019, the replacement for the adopted LDP, was submitted to Scottish Ministers on 31 January 2020. A reporter was appointed to examine issues raised in unresolved representations on 7 April 2020. Although not part of the development plan, the proposed Renfrewshire LDP 2 is at an advanced stage and is a material consideration in terms of the consideration of the EDM Project and is thus included in this chapter. Details of the development plan policies relevant to the EDM project are addressed below.

Overview of Consultation Undertaken to Date

5.15 Details of consultation relating to the EDM Project are covered in more detail in the Routeing and Consultation Report (2018) and summarised in **Chapter 2**. However, a brief summary is also provided here for ease of reference.

5.16 During the routeing stage, SPEN undertook consultation with stakeholders and the public to invite views on the preferred route for the New 132kV OHL, the removal of the Existing 132kV OHL and any other issues, suggestions or feedback. In particular, views were sought on the local area, for example areas used for recreation, local environmental features, etc.

5.17 The consultation period ran for four weeks from 12th February 2018 to 16th March 2018 prior to which letters (with accompanying consultation leaflet) were sent to the following groups:

- statutory and non-statutory consultees including community councils;
- local residents, landowners and businesses along the route;
- known local interest and community groups operating in Renfrewshire and Inverclyde Council Areas;
- elected members of Inverclyde and Renfrewshire Council Areas, the Member of Parliament (MP) and Members of the Scottish Parliament (MSPs) whose constituencies are within in the Inverclyde and Renfrewshire Council areas; and
- respondents to the previous consultation undertaken in 2007 and 2010.

5.18 Public consultation events were held on 15th and 16th February 2018 at two different local venues with newspaper adverts placed in the Greenock Telegraph and The Gazette on 7th and 14th February advertising the commencement of the consultation period and the public exhibitions.

¹ Applications for 1) consent for the new 132kV OHL under section 37 of the Electricity Act 1989 and 2) seeking a direction that planning permission is deemed to be granted under section 57(2) of the Town and Country Planning (Scotland) Act 1997 for the new 132kV OHL the decommissioning of the existing 132kV OHL and all ancillary development.

² Considered to be development that has either detailed planning permission or planning permission in principle or is allocated in an approved strategic development plan or an adopted local development plan.

³ As 1 above.

5.19 SPEN also undertook pre-application discussions with both Renfrewshire Council and Inverclyde Council planning authorities to discuss the EDM Project.

5.20 Details of the consultation undertaken by the relevant topic area specialists are provided in **Chapters 6-11**.

National Planning Framework for Scotland (NPF3)

5.21 NPF3, which was laid in the Scottish Parliament on 23rd June 2014, is the long term spatial expression of the Scottish Government's Economic Strategy and plans for infrastructure investment and development priorities over the next 20 to 30 years with a focus on supporting sustainable economic growth and the transition to a low carbon economy.

5.22 The classes of development considered to be national development and that fulfil this need are defined in NPF3: paragraph (2) (a) of Annex A's fourth development priority statement:

"2 – Description of Classes of Development: Development consisting of:

- a) new and/or upgraded onshore electricity transmission cabling of or in excess of 132 kilovolts, and supporting pylons
- b) new and/or upgraded onshore sub stations directly linked to electricity transmission cabling of or in excess of 132 kilovolts."

5.23 On the basis of the above, the New 132kV OHL (forming part of the EDM Project) is considered as a 'National Development' within NPF3.

5.24 Chapter 3 focuses on the promotion and achievement of a low carbon economy and the ambition to reduce greenhouse gas emission by 80% by 2050. NPF3 acknowledges that:

"electricity grid enhancements will facilitate increased renewable electricity generation across Scotland" (NPF3, para 3.28);

*"an updated national development focusing on enhancing the **high voltage transmission network** supports this"* (NPF3, para 3.28) and;

"strengthening the electricity grid will be essential in unlocking renewable resources, both onshore and offshore" (NPF3, para 3.40).

5.25 The EDM Project which includes replacing the ageing Existing 132kV OHL with a New 132kV OHL will provide secure and reliable supplies to existing and future customers, thereby improving resilience in the transmission network. The EDM Project will therefore assist with the reduction of carbon emissions through the enhancement it provides to the electricity grid network. This in turn facilitates the ability to increase renewable energy generation.

5.26 NPF3 identifies that *"both terrestrial and marine planning have a key role to play in reaching these ambitious targets⁴ by facilitating development, linking generation with consumers and guiding new infrastructure to appropriate locations"* (NPF3, para 3.12).

5.27 NPF3 strengthens the link between strategy and delivery through 14 national development priorities identified within Annex A (of NPF3). In relation to development priority number four of Annex A, 'An Enhanced High Voltage Electricity Network', the statement of need is as follows:

5.28 *"These classes of development are needed to support the delivery of an enhanced high voltage electricity transmission grid which is vital in meeting national targets for electricity generation, statutory climate change targets, and security of energy supplies."*

5.29 Early work on the preparation of National Planning Framework 4 (NPF4) has begun and as a result of the Planning (Scotland) Act 2019, the new NPF4 will incorporate Scottish Planning Policy and will receive enhanced status as part of the statutory development plan. The Scottish Government expects to publish a draft of NPF4 for public consultation in Q3 of 2020, which will follow an extensive period of engagement in Q1-Q2 of 2020. The final version of NPF 4 is expected to be laid before the Scottish Parliament in Q3 of 2021 with approval in Q4.

Scottish Planning Policy

5.30 Scottish Planning Policy (SPP) was published in June 2014 and is a statement of Scottish Government policy on nationally important development and land use planning. In general terms, SPP seeks to direct the right development to the right places and guide new infrastructure to appropriate locations.

5.31 With regards to the EDM Project, SPP notes that:

"Our spatial strategy facilitates the development of generation technologies that will help to reduce greenhouse gas emissions from the energy sector" (SPP, para 152)

"Efficient supply of low carbon and low-cost heat and generation of heat and electricity from renewable energy sources are vital to reducing greenhouse gas emissions" (SPP, para 153)

"The planning system should support the development of a diverse range of electricity generation from renewable energy technologies – including the expansion of renewable energy generation capacity" (SPP, para 154)

"The planning system should guide development to appropriate locations" (SPP, para 154)

"help reduce emissions and energy use...from new infrastructure by enabling development at appropriate locations that contribute to:

- Energy efficiency;
- Heat recovery;
- Efficient energy supply and storage; and
- Electricity and heat from renewable sources" (SPP, para 154)

"Strategic development plans should support national priorities for the construction or improvement of strategic energy infrastructure, including generation, storage, transmission and distribution networks" (SPP, para 156)".

5.32 With regard to the built and natural environment (cultural heritage, landscape, ground conditions, ecology, woodland/forestry, flooding and drainage), the SPP guidance detailed below is relevant for consideration in the assessment of the EDM Project and aligns with the development plan policies and in particular those in the adopted Local Development Plans (LDPs).

Cultural Heritage

5.33 The following SPP guidance is relevant for consideration in the cultural heritage assessment of the EDM Project and aligns with the policies considered at the local level through the LDPs:

"The siting and design of development should take account of all aspects of the historic environment" (SPP, para 140);

"Where planning permission and listed building consent are sought for development to, or affecting, a listed building, special regard must be given to the importance of preserving and enhancing the building, its setting and any features of special architectural or historic interest. The layout, design, materials, scale, siting and use of any development which will affect a listed building, or its setting should be appropriate to the character and appearance of the building and setting" (SPP, para 141).

"Proposals for development within conservation areas and proposals outwith which will impact on its appearance, character or setting, should preserve or enhance the character and appearance of the conservation area. Proposals that do not harm the character or appearance of the conservation area should be treated as preserving its character or appearance" (SPP, para 142).

"Where there is potential for a proposed development to have an adverse effect on a scheduled monument or on the integrity of its setting, permission should only be granted where there are exceptional circumstances" (SPP, para 145)

"Planning authorities should protect and, where appropriate, seek to enhance gardens and designed landscapes included in the Inventory of Gardens and Designed Landscapes and designed landscapes of regional and local importance" (SPP, para 148)

"There is also a range of non-designated historic assets and areas of historical interest, including historic landscapes, other gardens and designed landscapes, woodlands and routes such as drove roads which do not have statutory protection. These resources are, however, an important part of Scotland's heritage and planning authorities should protect and preserve significant resources as far as possible, in situ wherever feasible" (SPP, para 151)

Landscape

5.34 The following text from SPP is relevant for consideration in the LVIA and aligns with the policies considered at the local level through the LDPs:

⁴ Targets as detailed in paragraph 3.8 of NPF3 including electricity consumption from renewables

“The siting and design of development should take account of local landscape character. Development management decisions should take account of potential effects on landscapes and the natural and water environment, including cumulative effects. Developers should seek to minimise adverse impacts through careful planning and design, considering the services that the natural environment is providing and maximising the potential for enhancement” (SPP, para 202).

“Planning permission should be refused where the nature or scale of proposed development would have an unacceptable impact on the natural environment. Direct or indirect effects on statutorily protected sites will be an important consideration, but designation does not impose an automatic prohibition on development” (SPP, para 203).

Hydrology, Hydrogeology and Water Resources and Peat

5.35 The following text from SPP is relevant in the context of the assessment of potential effects on hydrology, hydrogeology, water resources and peat, and aligns with the policies considered at the local level through the LDPs:

“Where peat and other carbon rich soils are present, applicants should assess the likely effects of development on carbon dioxide (CO2) emissions. Where peatland is drained or otherwise disturbed, there is liable to be a release of CO2 to the atmosphere. Developments should aim to minimise this release” (SPP, para 205).

“Flood Risk Assessments (FRA) should be required for development in the medium to high category of flood risk, and may be required in the low to medium category in the circumstances described in the framework above, or where other factors indicate heightened risk. FRA will generally be required for applications within areas identified at high or medium likelihood of flooding/flood risk in SEPA’s flood maps” (SPP, para 266).

“Proposed arrangements for SuDS should be adequate for the development and appropriate long-term maintenance arrangements should be put in place” (SPP, para 268).

Ecology

5.36 The following text from SPP is relevant for consideration in the ecological assessment and aligns with the policies considered at the local level through the LDPs:

“Sites designated as Special Areas of Conservation (SACs) and Special Protection Areas (SPAs) make up the Natura 2000 network of protected areas. Any development plan or proposal likely to have a significant effect on these sites which is not directly connected with or necessary to their conservation management must be subject to an “appropriate assessment” of the implications for the conservation objectives. Such plans or proposals may only be approved if the competent authority has ascertained by means of an “appropriate assessment” that there will be no adverse effect on the integrity of the site” (SPP, para 207)

“Where non-native species are present on site, or where planting is planned as part of a development, developers should take into account the provisions of the Wildlife and Countryside Act 1981 relating to non-native species” (SPP, para 206)

“Development that affects a National Park, National Scenic Area, Site of Special Scientific Interest or a National Nature Reserve should only be permitted where:

- *the objectives of designation and the overall integrity of the area will not be compromised; or*
- *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”* (SPP, para 212).

Forestry and Woodland

5.37 The following text from SPP is relevant for consideration in the assessment of effects on forestry and woodland and aligns with the policies considered at the local level through the LDPs:

“The Scottish Government’s Control of Woodland Removal Policy⁵ includes a presumption in favour of protecting woodland. Removal should only be permitted where it would achieve significant and clearly defined additional public benefits. Where woodland is removed in association with development, developers will generally be expected to provide compensatory planting. The criteria for determining the acceptability of woodland removal and further information on the implementation of the policy is explained in the

Control of Woodland Removal Policy⁵, and this should be taken into account when preparing development plans and determining planning applications” (SPP, para 218).

5.38 Whilst ancient woodland has been avoided where possible during the routeing process, there is a relatively small proportion of the forest which is considered ancient and the areas of broadleaf woodland will include both long term ancient and semi-natural woodland in addition to some areas of more recently created broadleaf woodland, both native and non-native. In this regard, SPP notes the following:

“The planning system should protect and enhance ancient semi-natural woodland as an important and irreplaceable resource, together with other native or long-established woods, hedgerows and individual trees with high nature conservation or landscape value” (SPP, para 194)

“Ancient semi-natural woodland is an irreplaceable resource and, along with other woodlands, hedgerows and individual trees, especially veteran trees of high nature conservation and landscape value, should be protected from adverse impacts resulting from development. Tree Preservation Orders can be used to protect individual trees and groups of trees considered important for amenity or their cultural or historic interest” (SPP, para 216)

Additional Relevant Planning Policy, Guidance and Advice

5.39 At national level, planning policy is supported by Scottish Government guidance on a range of planning matters, including Planning Advice Notes (PAN), Design Advice and Web Advice. The nationally produced guidance considered relevant to the EDM Project is provided in **Table 5.1** below.

Table 5.1: Scottish Government Guidance

PANs and Additional Planning Guidance
Development Control and Design
PAN 68 Design Statements (2003)
Landscape and Visual Amenity
PAN 60 Planning for Natural Heritage 2000 (amended 2008)
Hydrology, Hydrogeology and Water Resources and Peat
PAN 51: Planning, Environmental Protection and Regulation (2006)
PAN 61 Planning and Sustainable Urban Drainage Systems (2001)
PAN 69: Flooding Risk (2015)
PAN 79: Water and Drainage (2006)
Ecology and Ornithology
PAN 60 Planning for Natural Heritage 2000 (amended 2008)
Construction Noise
PAN 1/2011 Planning and Noise (2011)
PAN 51: Planning, Environmental Protection and Regulation (2006)
Cultural Heritage
PAN 2/2011 Planning and Archaeology (2011)
Other Issues (including Coal, Telecommunications and Air Quality)
PAN 51: Planning, Environmental Protection and Regulation (2006)

⁵ In February 2019, Scottish Forestry published guidance on implementing the Scottish Government’s Control of Woodland Removal Policy.

PANs and Additional Planning Guidance
Assessment of Development
PAN 1/2013 Environmental Impact Assessment (2013)
Circular 1/2017: The Town and Country Planning (Environmental Impact Assessment) Scotland) Regulations 2017

Statutory Development Plan Policy

5.40 As noted above, the EDM Project spans two Local Authority areas; Inverclyde Council and Renfrewshire Council. Both Local Authorities fall within the Glasgow and Clyde Valley Strategic Development Plan Area. Clydeplan is the current Strategic Development Plan as approved in 2017. Clydeplan⁶, together with the adopted Inverclyde LDP 2019 and the adopted Renfrewshire Local Development Plan 2014 form the development plan for the area of the EDM Project. The following section of this chapter addresses the development plan policies together with statutory supplementary guidance of relevance to the EDM Project. As noted above, the Renfrewshire LDP 2 Proposed Plan 2019 (LDP2) is currently at an advanced stage. The LDP2 policies, and draft supplementary guidance is presented within the section on other material considerations however LDP2 policies are included in **Table 5.4** along with those of the adopted LDP for reference.

Clydeplan Strategic Development Plan 2017

5.41 Clydeplan seeks to create “a resilient, sustainable compact city region attracting and retaining investment and improving the quality of life for people and reducing inequalities through the creation of a place which maximises its economic, social and environmental assets ensuring it fulfils its potential as Scotland’s foremost city region” (Clydeplan, page 8). It is envisaged that by 2036, the City Region will be contributing to the Scottish Governments strategic objectives which include creating “Low carbon heat and power, waste management and green networks, contributing to ecologically sustainable economy and lifestyles” (Clydeplan, page 8).

5.42 Table 5.2 below details the policies within Clydeplan which are relevant to the EDM Project. Each policy is taken in turn and the wording of each policy is detailed in the following paragraphs. The policies have also been considered by the EIA topic specialists to inform their assessments.

Table 5.2: Clydeplan Policies relevant to the EDM Project

Topic	Clydeplan Strategic Development Plan (2017)
Routing and Design	Policy 1: Placemaking Policy 2: Leadership in the Delivery of the Vision and Spatial Development Strategy Policy 14: Green Belt
Geology, Hydrology, Hydrogeology, Water Resources and Peat	Policy 16: Improving the Water Quality Environment and Managing Flood Risk and Drainage
Forestry	Policy 13: Forestry and Woodland

Routing and Design

5.43 Policy 1: Placemaking states that:

“New development should contribute towards the creation of high-quality places across the city region. In support of the Vision and Spatial Development Strategy new development proposals should take account of the Placemaking Principle set out in Table 1”.

⁶ Clydeplan Strategic Development Plan (2017)

5.44 Table 1 of page 13 of Clydeplan contains details of the considerations which new development proposals should take account of in their design process. In this regard, not all of the placemaking principle criteria would apply to the EDM Project; those of relevance have been set out below for ease of reference.

Table 1 Placemaking Principle (relevant principles/considerations to the EDM Project only)

<p>Distinctive</p> <p>Supporting a Successful and Sustainable city region, Natural, Resilient city region</p>	<ul style="list-style-type: none"> Safeguards national and regionally important locations for tourism and recreational development in support of the sustainable growth of the visitor economy Safeguards and promotes significant environmental, historic and cultural assets <p>Maintains and enhances an area’s landscape character and supports the objectives of the Glasgow and Clyde Valley Green Belt.</p>
<p>Safe and Pleasant</p> <p>Supporting a Successful and Sustainable city region, Low Carbon city region, Natural, Resilient city region, Connected city region</p>	<ul style="list-style-type: none"> Maintains or improves air quality.
<p>Resource Efficient</p> <p>Supporting a Successful and Sustainable city region, Low Carbon city region, Natural, Resilient city region</p>	<ul style="list-style-type: none"> Optimises the use of existing infrastructure. Protects and improves the water environment particularly in relation to flood risk, surface water management and water quality.

5.45 Policy 2: Leadership in the Delivery of the Vision and Spatial Development Strategy states that:

“In support of the delivery of the Vision and Spatial Development Strategy by 2036, Clydeplan will encourage continued joint working and a multiagency approach aligned to corporate leadership and decision making, in both the public and private sector which gives priority to the delivery of the Vision and Spatial Development Strategy.

This will be achieved through

Local Authorities: implementation of policies and actions set out in Local Development Plans and related corporate documents including Local Housing Strategies, Local Transport Strategies, Economic Development Strategies, Single Outcome Agreements, Community Planning and the Glasgow and Clyde Valley City Deal;

Scottish Government: implementation of policies and actions set out in National Planning Framework, Scottish Planning Policy and related investment programmes;

Key Agencies: co-ordination and implementation of their investment programmes;

Infrastructure bodies: co-ordination and implementation of their future capital investment programmes; and,

Development and Investment sector: co-ordination and implementation of development proposals and investment strategies

5.46 Policy 14: Green Belt states that:

“In support of the Vision and Spatial Development Strategy, Local Authorities should:

- *designate within Local Development Plans, the inner and outer boundaries of the Green Belt to ensure the objectives set out in paragraph 8.15 are achieved; and,*
- *collaborate to ensure consistency across Local Development Plan areas when defining or altering Green Belt boundaries”.*

Geology, Hydrology, Hydrogeology, Water Resources and Peat

5.47 Policy 16: Improving the Water Quality Environment and Managing Flood Risk and Drainage states the following:

“To support the Vision and Spatial Development Strategy and to achieve the objectives set out in paragraph 8.28 Local Development Plans and development proposals should protect and enhance the water environment by

- *adopting a precautionary approach to the reduction of flood risk;*
- *supporting the delivery of the Metropolitan Glasgow Strategic Drainage Plan;*
- *supporting the delivery of the Glasgow and the Clyde Valley Green Network; and,*
- *safeguarding the storage capacity of the functional floodplain and higher lying areas for attenuation”.*

Forestry

5.48 Policy 13: Forestry and Woodland states that:

“In support of the Vision and Spatial Development Strategy and to achieve the national woodland coverage targets set out in the Scottish Forestry Strategy (2006), development proposals, where appropriate, should

- *support the retention and expansion of forestry and woodland (or multi-functional woodland resource) in keeping with the Forestry and Woodland Strategy and related Spatial Framework (Background Report 12); and,*
- *minimise the loss of existing trees and include, where appropriate, the planting of new trees, woodlands and forestry in support of the Scottish Government’s Control of Woodland Removal Policy or as replaced by Supplementary Guidance referred to below.*

Supplementary Guidance will be produced to replace the Forestry and Woodland Strategy (Background Report 12). This will update the information and guidance currently contained within in it, including that set out at paragraph 8.12. The Supplementary Guidance should be submitted to Ministers within 1 year of the date of approval of this plan”.

Inverclyde Local Development Plan 2019

5.49 The recently adopted LDP 2019 notes that *“the overall aim of the Plan is to contribute towards Inverclyde being an attractive and inclusive place to live, work, study, visit and invest, now and in the future particularly through encouraging investment and new development, which is sustainably designed and located and contributes to the creation of successful places, and by protecting and enhancing the natural environment of Inverclyde”* (LDP, page 1).

5.50 To achieve this aim, the LDP is underpinned by a Sustainable Development Strategy and a Spatial Development Strategy. Of relevance to the EDM Project, the sustainable development strategy notes that in ‘tackling climate change’, the aim is *“to reduce greenhouse gases through support for he sustainable production and distribution of energy and management of waste, and to be prepared for the impacts of climate change by managing flood risk”* (LDP, page 1).

5.51 Table 5.3 below sets out the LDP policies of relevance to the EDM Project. These have been identified on the basis of the physical location of components of the EDM Project within, or in proximity to, areas designated for their natural or cultural heritage value or as a consequence of potentially significant environmental effects of the EDM Project on the resources covered by a particular policy, prior to the application of good practice measures or mitigation. This is structured by EIA topic area. These policies have also been considered by the EIA topic specialists to inform their assessments.

5.52 It is important to note that as a consequence of the routing work outlined in **Chapter 3: Routeing Process and Design Strategy**, many of the areas designated in the LDP for their natural or cultural heritage value have been avoided with the route/design of the New 132kV OHL.

Table 5.3: Inverclyde policies relevant to the EDM Project

Topic	Inverclyde Local Development Plan (2019)
Routing and Design	Policy 1: Creating Successful Places Policy 38 – Path Network
Geology, Hydrology, Hydrogeology, Water Resources and Peat	Policy 8 – Managing Flood Risk
	Policy 15 - Soils
	Policy 39 – Water Environment
Natural Environment	Policy 14 – Green Belt and Countryside
	Policy 33 – Biodiversity and Geodiversity
Cultural Heritage	Policy 28 – Conservation Areas
	Policy 29 – Listed Buildings
	Policy 31 – Scheduled Monuments and Archaeological Sites
	Policy 32 – Gardens and Designed Landscapes
Forestry	Policy 34 – Trees, Woodland and Forestry
Energy	Policy 4 – Supplying Energy

Routing and Design

5.53 Policy 1: Creating Successful Places builds upon the guidance of SPP where there is a presumption for development to contribute to the creating a successful place using the six key qualities (distinctive, resource efficient, safe and pleasant, adaptable, easy to move around and welcoming).

5.54 The policy wording of Policy 1 is set out below:

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

5.55 Figure 3 of the LDP identifies factors which contribute to a successful place and factors which should be given consideration when preparing development proposals. Of relevance to the EDM Project, it is considered that the following factors have been considered through the design and routeing strategy (as detailed in **Chapter 3**):

- Retain locally distinct built or natural features;
- Utilise sustainable design and construction techniques; and
- Avoid conflict between adjacent uses by having regard to adverse impacts that may be created by noise; smell; vibration; dust; air quality; flooding; invasion of privacy or overshadowing.

5.56 The western end of the New 132 kV OHL will cross over the routes of two Core Paths within the Inverclyde Council area; route 37B Clune Brae, Port Glasgow, and 57D Auchenleck to Kilmacolm which run in a north-south direction from Port Glasgow. **Policy 38: Path Network** states the following:

“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”.

Geology, Hydrology, Hydrogeology, water resources and peat

5.57 The corresponding policies relevant to the New 132kV OHL are **Policy 8: Managing Flood Risk; Policy 15: Soils** and **Policy 39 – Water Environment** are outlined below.

5.58 Policy 8: Managing Flood Risk states that:

“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”.

5.59 Policy 15: Soils states that:

“Development on prime agricultural land or affecting carbon rich soils will only be supported if:

- a) it is on land allocated for development in this Local Development Plan or meets a need identified in the Strategic Development Plan;*
- b) there is a specific locational need for the development;*
- c) it is for small scale development directly linked to a rural business; or*
- d) it is for renewable energy generation or mineral extraction, and the proposals include provision for the site to be returned to its former status.*

For carbon rich soils, it will also need to be demonstrated that adverse impacts on the soil resource during the construction and operational phases of a development will be minimised and the development will not result in a net increase in CO2 emissions over its lifetime”.

5.60 Policy 39 – Water Environment states that:

“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;*
- e) maintaining or improving waterside and water-based habitats; and*
- f) providing appropriately sized buffer strips between development and watercourses, in line with SEPA guidance, and providing access to the water and waterside, where appropriate”.*

Natural Environment

5.61 All elements of the New 132kV OHL within the Inverclyde Local Authority area are located within the Green Belt and **Policy 14: Green Belt and Countryside** is relevant. Policy 14 is set out below:

“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”.

5.62 The western portion of the route through the Inverclyde authority area becomes less intensively managed and upland habitat assemblages were identified. These areas may support a varied assemblage of protected species or species of conservation interest. Where the EDM Project travels through the Green Belt, runs adjacent to the River Clyde SPA, Ramsar and Site of Special Scientific Interest (SSSI), adjacent to Green Network connectivity areas and through local Sites of Importance for nature Conservation (SINC) designations, consideration should be given to **Policy 33: Biodiversity and Geodiversity**; Policy 33 states:

“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 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, compensatory measures will be required.

LOCAL LANDSCAPE AREAS

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”.

Cultural Heritage

5.63 The New 132kV OHL will pass within the vicinity of or have theoretical visibility from a number of cultural heritage assets including Craigmarloch Gill Fort (Scheduled Monument), High Castlehill (Scheduled Monument), Category B Listed Cloak (Formerly Mossie), Cloak Road and Category B Listed Auchenbothie House. Further afield, and still within the 3km Study Area, there are the Conservation Areas of The Cross and Kilmacolm, and Finlaystone House and Duchal House Garden and Designed Landscapes. In addition, decommissioning works associated with the Existing 132kV OHL will require to be carried out within Whitemoss Roman Fort (SM1652) (Scheduled Monument) and the Formakin Garden and Designed Landscape. Effects on Listed Buildings and Conservation Areas in the wider surrounding environment are also considered in **Chapter 10: Cultural Heritage**. The corresponding Policies **Policy 28: Conservation Areas, Policy 29: Listed Buildings, Policy 31: Scheduled Monuments and Archaeological Sites and Policy 32: Gardens and Designed Landscapes** are outlined below.

5.64 Policy 28: Conservation Areas states that:

“Proposals for development, within or affecting the setting of a conservation area, are to preserve or enhance the character and appearance of the area. In assessing such proposals regard will be had to any relevant Conservation Area Appraisals or other information relating to the historic or architectural value of the conservation area. Where the demolition of an unlisted building is proposed, consideration will be given to the contribution the building makes to the character and appearance of the conservation area. If such a building makes a positive contribution to the area, there will be a presumption in favour of retaining it. Proposals for demolition will not be supported in the absence of a planning application for a replacement development that preserves or enhances the character and appearance of the conservation area”.

5.65 Policy 29: Listed Buildings states that:

“Proposals for development affecting a listed building, including its setting, are required to protect its special architectural or historical interest. In assessing proposals, due consideration will be given to how the proposals will enable the building to remain in active use. Demolition of a listed building will not be permitted unless the building is no longer of special interest; it is clearly incapable of repair; or there are overriding environmental or economic reasons in support of its demolition. Applicants should also demonstrate that every reasonable effort has been made to secure the future of the building”.

5.66 Policy 31: Scheduled Monuments and Archaeological Sites states that:

“Development that would potentially have an adverse effect on a Scheduled Monument or the integrity of its setting will only be permitted in exceptional circumstances. Development affecting archaeological sites should seek to preserve the archaeological resource in situ”.

5.67 Policy 32: Gardens and Designed Landscapes states that:

“Development that would affect a Garden and Designed Landscape is required to protect and appropriately enhance its important features”.

Forestry

5.68 Approximately 2.8km of the new EDM OHL will pass through forestry. In this regard, **Policy 34: Trees, Woodland and Forestry** is detailed below:

“The Council supports the retention of ancient and semi-natural woodland, trees covered by Tree Preservation Orders and other trees and hedgerows, which have significant amenity, historical, ecological, landscape or shelter value. Where the removal of such woodland, trees or hedgerows is proposed as part of a planning application, this will not be supported unless:

- a) it can be clearly demonstrated that the development cannot be achieved without removal;
- b) the public benefits of the proposal outweigh the loss of trees/hedgerows; and
- c) compensatory planting will be provided, to a standard agreed by the Council.

Development affecting trees will be assessed against Supplementary Guidance to be prepared by the Council. This will also cover the protection of ancient woodlands and the management and protection of existing and new trees during and after the construction phase.

Proposals for new forestry/woodland planting will be assessed with regard to the Supplementary Guidance to be prepared in association with the Clydeplan Strategic Development Plan, and the UK Forestry Standard”.

Energy

5.69 Inverclyde Council supports, in principle, heat and electricity infrastructure that will help reduce greenhouse gases, subject to consideration of the effects of the proposed development. **Policy 4: Supplying Energy** provides further detail in this regard:

“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 effects on:

- a) the green network (including landscape), and historic buildings and places;
- 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

Relevant proposals are required to accord with the Council’s Supplementary Guidance on Energy”.

Statutory Supplementary Guidance

5.70 The recently adopted LDP is supplemented by four new Statutory Supplementary Guidance covering the following topics:

- Energy;
- Enabling Development;
- Priority Places; and
- Planning Application Advice Notes

5.71 The content of these supplementary guidance documents is not directly related to the OHL project and the Supplementary Guidance on Energy focuses primarily on wind energy, with the key reference to the distribution of electricity relating back to LDP Policy 4: Supplying Energy (as noted above). On this basis, no further detailed reference to the Statutory Supplementary Guidance is required.

Renfrewshire Local Development Plan 2014

5.72 As noted above, the adopted LDP plan is the Renfrewshire LDP 2014. LDP2, the replacement for the adopted LDP, was submitted to Scottish Ministers on 31 January 2020. A reporter was appointed to examine issues raised in unresolved representations on 7 April 2020. Adoption is expected by late 2020. The relevant LDP2 policies are discussed in more detail within the other material considerations section of this chapter, however, they are also included in **Table 5.4** due to the anticipated timescale for the adoption of LDP2 in relation to the assessment of the EDM Project.

5.73 The adopted LDP aims to promote sustainable economic growth and regenerate, create and enhance communities and places through the provision of high-quality new development in the right locations. The policies within the LDP “provide a balance between the need to protect and enhance the environment and quality of life within Renfrewshire as well as promoting development activity

and investment” (LDP, page4). Further, the “strategy supports measures for the reduction, mitigation and adaption to climate change along with the promotion of a low carbon economy” (LDP, page 4).

5.74 The implementation of the Spatial Strategy requires new development to follow the following criteria (where relevant):

- “The quality of the development contributes positively to the character and appearance of the place, benefiting the amenity of the area and protecting the built heritage, its setting and the natural environment;
- The design of new development is demonstrated to benefit the area by following the principles of ‘Designing Places’.
- Buildings and structures are designed to support the principles of low carbon generating technology to reduce emissions; and
- The development does not have an adverse effect on the integrity of any sites protected as a Natura 2000 site”.

5.75 Throughout the LDP, the objectives and programme delivery is separated by topic; Economy, Centres, Infrastructure, Places and Environment. The following objectives and delivery strategies are considered relevant to the EDM Project:

“measures to reduce and mitigate for the effects of climate change” (LDP, page 23 and 31);

“Investigate potential for renewable energy infrastructure developments” (LDP, page 23);

“development that neither individually nor cumulatively causes significant environmental impacts” (LDP, page 31);

Table 5.4: Renfrewshire Development Plan Policies of relevance to the EDM Project

Topic	Renfrewshire Local Development Plan (adopted 2014)	Renfrewshire Local Development Plan 2 Proposed Plan (2019)
Geology, Hydrology, Hydrogeology, Water Resources and Peat	Policy I5: Flooding and Drainage	Policy I3: Flooding and Drainage
	Policy ENV4: The Water Environment	Policy ENV4: The Water Environment Policy ENV6: Natural Resources
Natural Environment	Policy ENV1: Green Belt	Policy ENV1: Green Belt
	Policy ENV2: Natural Heritage	Policy ENV2: Natural Heritage
	Policy P7: Green Network	Policy P5: Green/Blue Network
Cultural Heritage	Policy ENV3: Built Heritage	Policy ENV3: Built Heritage
Energy	Policy I6: Renewable and Low Carbon Energy Developments	Policy I4: Renewable and Low Carbon Energy Developments

Geology, Hydrology, Hydrogeology, Water Resources and Peat

5.76 Where there are some localised areas of surface water flooding within the route of the New 132kV OHL, and where approximately 1km of the route runs within the flood plain of the River Clyde within the Renfrewshire Council authority area, **Policy I5: Flooding** and **Policy ENV4: The Water Environment** are relevant. Each are detailed below.

5.77 **Policy I5: Flooding** states:

“New development should avoid areas susceptible to flooding and is required to demonstrate promotion of sustainable flood risk management measures by implementing suitable drainage infrastructure. Development must not have an impact on existing drainage infrastructure or increase the risk of flooding. Where any development involves land raising, effective compensation for any loss of local flood storage capacity must be secured. The implementation of new or improved drainage requires to employ Sustainable Urban Drainage Systems (SUDS) measures and flooding and drainage measures should aim to have a positive effect on the water environment as well as the natural heritage interests of the site or land surrounding the site. Any development will require to be assessed against the criteria and guidance set out in the New Development SG and be supported by an assessment of flood risk when deemed necessary by the planning authority”.

5.78 **Policy ENV4: The Water Environment** states that:

“In line with the Water Framework Directive, River Basin Management Plan and the Clyde Area Management Plan, there will be support for proposals which encourage protection of the existing water environment as well as improvement to the control and management of water along with the enhancement of biodiversity, flora and fauna surrounding blue corridors. The inclusion of green infrastructure which promotes the integration of blue and green networks in and around developments will be encouraged to ensure that the water environment is central to the fabric of places, contributing to sustainable flood management and not having an adverse effect on the integrity of any Natura 2000 sites. Proposals for development will require to be assessed against the criteria set out in the New Development SG”.

Natural Environment

5.79 The EDM Project is wholly located within the Green Belt, is partially located adjacent to the River Clyde SPA, Ramsar and SSSI, adjacent to Green Network connectivity areas and partially located within local SINC designations. On this basis, the following LDP policies are considered of relevance: **Policy ENV1: Green Belt** and **Policy ENV2: Natural Heritage**. The content of each of these policies are detailed below.

5.80 **Policy ENV1: Green Belt** states that:

“The green belt in Renfrewshire aims to identify appropriate locations to support planned growth, where required, as well as maintaining the identity of settlements, protecting and enhancing the landscape setting of an area and protecting and promoting access opportunities to open space. Appropriate development within the green belt will be considered acceptable where it can be demonstrated that it is compatible with the provisions of the New Development SG. Support will be given to developments that are able to demonstrate diversification within green belt and rural areas which promote new employment opportunities and / or community benefits”.

5.81 **Policy ENV2: Natural Heritage** states that:

“To accord with the Local Development Plan, developments must not have an adverse effect on the integrity of sites protected for their natural conservation interest or which have the potential to protect and enhance designated sites and the wider biodiversity and geodiversity of the area. Where appropriate, the Council will seek to improve these resources. All proposals will be assessed in terms of the cumulative impact of development based on the precautionary principle considering the effect on the following:

- Natura 2000 and Ramsar Sites;
- Protected Species;
- SSSI's;
- LNRs, SINCs and wildlife corridors;
- Biodiversity; and
- Trees - Ancient and semi- natural woodland, TPOs and Conservation Areas.

Developments and change of uses affecting those outlined above will be assessed against criteria set out in the New Development SG”.

Cultural Heritage

5.82 Within Renfrewshire the New 132kV OHL passes close to a number of Scheduled Monuments including Whitemoss Roman Fort, Bishopton Aqueduct and No. 4 Ritchieston enclosure; Formakin Garden and Designed Landscape and a number of Listed Buildings/Structures including Category C Listed Gate-Lodge to Convent of The Good Shepherd, Category B Listed Old Bishopton House, Category C Listed Ritchieston Cottages and Category B Listed Blantyre Monument by Freeland. The Existing 132kV OHL (to be decommissioned and removed) currently passes through both the Whitemoss Roman Fort Scheduled Monument and the Formakin Garden and Designed Landscape. Where there are cultural heritage assets in the vicinity of the EDM Project, **Policy ENV3: Built Heritage** is of relevance and is detailed below.

5.83 **Policy ENV3: Built Heritage** states that:

“The built heritage which includes listed buildings, conservation areas, scheduled monuments, sites of known archaeological interest, unscheduled archaeological sites and the inventory of gardens and designed landscapes will be safeguarded, conserved and enhanced, where appropriate. Development proposals, including enabling development, within or in the vicinity of built heritage assets

will be required to demonstrate that there is no negative impact to their site or setting and is in accordance with the provisions set out in the New Development SG.

The Council supports the retention and sympathetic restoration, appropriate maintenance and sensitive management of listed buildings to enable them to remain in active use. The layout, design, materials, scale, siting and use of any development which will affect a listed building or its setting should be sensitive to the buildings character, appearance and setting”.

Energy

5.84 Policy I6: Renewable and Low Carbon Energy Developments states that:

“Renewable and low carbon energy developments will be supported in principle where they are appropriate in terms of the location, siting and design having regard to any individual or cumulative significant effects on:

- Local environment, landscape character, built, natural or cultural heritage;
- Amenity of existing or allocated uses;
- Visual amenity;
- Outdoor sport and recreation interest; and
- The safe and efficient use of the airport, flight activity, navigation, flight paths and Ministry of Defence surveillance system.

Any development will require to comply with the above criteria as well as the details outlined in the New Development SG”.

Statutory Supplementary Guidance

5.85 Consideration has also been given to the Statutory Supplementary Planning Guidance documents associated with the adopted LDP. Of relevance to the EDM Project is the **New Development Supplementary Guidance (Nov 2014)**. This Supplementary Guidance (SG) provides the detailed development criteria for the assessment of proposals to supplement the strategy, priorities and principles of the LDP. The SG is structured around five themes: economy, centres, infrastructure, places and environment. Policy considerations such as flooding and drainage; environment development criteria; green belt; natural heritage; international, national and local designations; and built heritage are further covered in the SG.

Other Material Considerations

5.86 The Renfrewshire LDP 2 Proposed Plan 2019 is a material planning consideration.

Renfrewshire Local Development Plan 2 - Proposed Plan (June 2019)

5.87 Emerging LDP2 policies of relevance to the EDM Project are summarised in **Table 5.4** above. The current target for Renfrewshire Council is to have adopted LDP2 by late 2020.

5.88 Like the adopted LDP, LDP2 seeks to direct development to the correct locations, “with high quality design, energy efficient and low carbon developments that will benefit our communities, safeguarding our environment as well as our natural, built and cultural heritage” (LDP2 page 3).

5.89 LDP2 sets out a spatial strategy which identifies the key principal areas as ‘economy, centres, infrastructure, places and environment’. To implement the Spatial Strategy, the LDP2 states that any new development will be supported where it aims to incorporate (where relevant) the following criteria:

- “Supports sustainable and inclusive economic growth and/or is related to the delivery of City Deal investment;
- Contributes positively to the character and appearance of the place, benefiting the amenity of the area and protecting and enhancing the natural, built and cultural heritage and it’s setting;
- Will regenerate and invest in Renfrewshire’s Network of Centres;
- The design of new development is demonstrated to benefit the area by following the principles of ‘Renfrewshire’s Places’ Design Guidance;
- Development is supported by existing or planned infrastructure;

- Buildings and structures are designed to support the enhancement and delivery of low carbon generating technology to reduce emissions; and

- The development does not have an adverse effect on the integrity of any sites protected as a Natura 2000 site”.

5.90 Similar to the adopted LDP, the LDP2 also identifies objectives for each of the key principle areas. Objectives of relevance to the EDM Project are:

“A framework for local solutions to waste and energy needs and waste generation using renewable and low carbon technologies in support of the transition to a low carbon economy”

“Promote and support measures to reduce and mitigate the effects of climate change”

“Development that neither individually nor cumulatively causes significant environmental impacts”

5.91 The principals of the policies considered as part of the adopted LDP remain largely the same in the LDP2, although the specific wording and numbering of the policies has changed. As per **Table 5.3**, there is one new policy for consideration in relation to the EDM Project.

5.92 Where there are proposed changes to the wording of the policies within the LDP2 each of the relevant policies are detailed below for ease of reference. It should be noted however that, at the time of writing, these policies have not yet been subject of examination by a reporter and as such may be subject to change through the examination process. As this LDP2 remains a material consideration, the weight to be attached to it is a matter for the decision maker.

Geology, Hydrology, Hydrogeology, water resources and peat

5.93 As noted previously, where there are some localised areas of surface water flooding within the route of the New 132kV OHL, and where approximately 1km of the route runs within the flood plain of the River Clyde within the Renfrewshire Council authority area, **Policy I3: Flooding and Drainage, Policy ENV4: The Water Environment** and **Policy ENV6: Natural Resources** are relevant to the proposed development. Each are detailed below.

5.94 Policy I3: Flooding and Drainage states that:

“The delivery of the Clyde and Loch Lomond Flood Risk Management Plan, the Scotland and Clyde Area River Basin Management Plans and the Metropolitan Glasgow Strategic Drainage Plan will be supported in order to reduce flooding, flood risk and improve the condition of water bodies within Renfrewshire.

A precautionary approach will be adopted to the reduction of flood risk from all sources in line with the risk framework set out in Scottish Planning Policy. Avoidance is the first principle of Sustainable Flood risk Management. New development requires to avoid areas susceptible to flooding and developers will be required to demonstrate promotion of sustainable flood risk management measures by implementing suitable drainage infrastructure. Development must not have an adverse impact on existing drainage infrastructure, increase the risk of flooding or result in the loss of land that has the potential to contribute to the management of flood risk through natural flood management, green infrastructure or as part of a flood management scheme.

Development which involves land raising will be considered in relation to the risk framework set out in Scottish Planning Policy and SEPA guideline with effective compensation for any loss of local flood storage capacity secured on a like for like basis. New development will integrate surface water management into the design of green infrastructure based on naturalised Sustainable Urban Drainage Systems (SUDS).

Flooding and drainage measures require to have a positive effect on the water environment as well as the natural heritage interests of the site and land surrounding the site.

All development proposals require to be supported by an assessment of flood risk and drainage when deemed necessary by the Planning Authority”.

5.95 Policy ENV4: The Water Environment states that:

“In line with the Clyde and Loch Lomond Flood Risk Management Plan and the Scotland and Clyde Area River Basin Management Plans, there will be support for proposals which encourage protection of the existing water environment, improvements to the control and management of water and the enhancement of biodiversity, flora and fauna surrounding blue corridors.

The Blue Network identified on Figure 14 will be protected and where necessary enhanced in order to facilitate improvements to the quality of water bodies and the water environment. The inclusion of green infrastructure which promotes the integration of blue and

green networks in and around developments will be encouraged to ensure that the water environment is central to the fabric of places, contributes to sustainable flood management and does not have an adverse effect on the integrity of any Natura 2000 sites”.

5.96 Policy ENV6: Natural Resources states that:

“Minerals

Development proposals require to demonstrate that they will not result in the sterilisation or degradation of mineral deposits that have or can be shown to have potential of being extracted economically.

Proposals for the winning and working of minerals will be permitted, where appropriate, when related to existing workings or in exceptional cases, where resources of a particular type or quality are unavailable from a suitable alternative source. Proposals will also be considered in relation to other relevant Development Plan Policies.

Development proposals in some parts of Renfrewshire may be at risk from unstable ground which is a legacy of previous mine workings. The Coal Authority publishes maps of such areas and development proposals in these locations will require to be accompanied by a Coal Report to help determine options for the future development of the site.

Soils

New development should avoid the unnecessary disturbance of areas of peatland or carbon-rich soils with a presumption against development which would involve significant draining or disturbance of peatland or carbon-rich soils. There will be support for peatland restoration, including rewetting where appropriate.

Where peat and other carbon rich soils may be affected by development, a survey and management plan will be required which identifies:

- means of minimising impact on carbon rich soils ensuring that the areas of deepest peat have been avoided and unnecessary disturbance, degradation or erosion of peat has been avoided;
- management measures relative to the carbon rich soil; and
- suitable mitigation measures to minimise the potential effects on CO2 emissions”.

Natural Environment

5.97 As per the adopted LDP, the EDM Project travels through the Green Belt, runs adjacent to the River Clyde SPA, Ramsar and SSSI, adjacent to Green Network connectivity areas and through local SINC designations, the following LDP2 policies are considered of relevance: **Policy ENV1: Green Belt**, **Policy ENV2: Natural Heritage** and **Policy P5: Green/Blue Network**. The content of each of these policies are detailed below.

5.98 Policy ENV1: Green Belt states that:

“The green belt in Renfrewshire maintains the identity of settlements, protecting and enhancing the landscape setting of an area and protecting and promoting access opportunities to open space.

Development within the green belt will only be considered acceptable where it can be demonstrated that it is compatible with the provisions of the New Development Supplementary Guidance. Support will be given to developments that are able to demonstrate diversification within green belt and rural areas which promote new employment, tourism opportunities and / or community benefits”.

5.99 Policy ENV2: Natural Heritage states the following:

“Development proposals will consider the potential impacts on natural heritage. Development proposals should protect and restore degraded habitats, enhance and promote access to Renfrewshire’s natural environment and minimise any adverse impacts on habitats, species, network connectivity or landscape character. Developments must not have an adverse effect on the integrity of sites protected for their natural conservation interest or the wider biodiversity and geo-diversity of the area.

All proposals will be assessed in terms of the mitigation hierarchy of Avoid/Reduce/Compensate, the cumulative impact of development based on the precautionary principle and should protect, and where possible enhance:

- Natura 2000 and Ramsar Sites;
- Protected Species;
- SSSI’s;

- Wild land;
- LNRs, SINCs and wildlife corridors;
- Biodiversity;
- Landscape character and setting;
- Clyde Muirshiel Regional Park; and
- Trees - Ancient and semi- natural woodland in line with the Scottish Government’s Control of Woodland Removal Policy and Clydeplan’s Forestry and Woodland Strategy, significant trees including those covered by Tree Preservation Orders, hedgerows and trees within Conservation Areas

Developments and changes of use affecting those outlined above will be assessed against criteria set out in the New Development Supplementary Guidance”.

5.100 Policy P5: Green/Blue Network states that:

“Development which protects, maintains or enhances the quality and connectivity of green/blue networks as an integral functioning part of the place, including core paths, rights of access, open space and the water environment will generally be supported. Development proposals should contribute to and enhance the wider integrated green/blue network where there are opportunities for activity and access to open space as well as increasing accessibility to active travel routes in and around communities and places.”

Traffic and Transport

5.101 As with the adopted LDP, it is relevant to consider policies in relation to the potential traffic and transport effects associated with the construction of the New 132kV OHL the ancillary works and the decommissioning of the Existing 132kV OHL. Relevant policies are **Policy I1: Connecting Places**; and **Policy ENV5: Air Quality**. The content of the policies is set out below.

5.102 Policy I1: Connecting Places states that:

“Good accessibility and connectivity to walking, cycling and public transport to support modal shift is a key consideration for investing in Renfrewshire.

All development proposals require to ensure appropriate provision and accessibility including the ability to connect to active travel, public transport networks, hubs and interchanges and set out how this can be achieved. Development proposals which give priority to sustainable modes of travel and have no significant impact on the safe and efficient operation of the local or trunk road network will be supported.

Development proposals require to be designed to incorporate existing or future high-speed digital network connections and other digital technologies”.

5.103 Policy ENV5: Air Quality states that:

“Development proposals individually or cumulatively should not have a significant adverse effect on air quality particularly within or adjacent to Renfrewshire’s Air Quality Management Areas as shown on the Proposals Maps.

Where required, planning applications should be accompanied by an air quality assessment which demonstrates the likely impact on air quality and how such impacts will be mitigated, including measures that support active travel and public transport as an alternative to private vehicular traffic”.

Cultural Heritage

5.104 Within the Renfrewshire administrative area, the works comprised in the EDM Project, both construction and decommissioning will pass close to a number of Scheduled Monuments including Whitemoss Roman Fort, Bishopton Aqueduct and No. 4 Ritchieston enclosure; Formakin Garden and Designed Landscape and a number of Listed Buildings/Structures including Category C Listed Gate-Lodge to Convent of The Good Shepherd, Category B Listed Old Bishopton House, Category C Listed Ritchieston Cottages and Category B Listed Blantyre Monument by Freeland. Where there are cultural heritage assets in the vicinity of the works **Policy ENV3: Built Heritage** is of relevance and is detailed below.

5.105 Policy ENV3: Built Heritage states that:

"Renfrewshire's built and cultural heritage which includes listed buildings, conservation areas, scheduled monuments, sites of known archaeological interest, unscheduled archaeological sites and the inventory of gardens and designed landscapes will be safeguarded, conserved and enhanced, where appropriate.

Development proposals, including enabling development, within or in the vicinity of built and cultural heritage assets will be required to demonstrate that there is no negative impact to their site or setting and is in accordance with the provisions set out in the New Development Supplementary Guidance.

There will be support for the retention and sympathetic restoration, appropriate maintenance and sensitive management of listed buildings to enable them to remain in active use.

The layout, design, materials, scale, siting and use of any development which will affect a listed building, or its setting should be sensitive to the buildings character, local landscape character, appearance and setting".

Energy

5.106 Policy I4: Renewable and Low Carbon Energy Developments states that:

"Development proposals which deliver increased energy efficiency and the recovery of energy that would otherwise be lost will be supported. Renewable and low carbon energy developments, including the delivery of heat networks, will be considered in the relation to the scale of the contribution towards renewable energy generation targets and will be supported in principle where they are appropriate in terms of the location, siting and design having regard to any individual or cumulative significant effects on:

Local environment, landscape character, built, natural or cultural heritage and water environment;

- Amenity of existing or allocated uses;
- Visual amenity, air quality, noise, glare and shadow flicker;
- Outdoor sport and recreation interest;
- Transport infrastructure, including road traffic and the safety of local and trunk roads and the railway network; and

¹ <https://forestry.gov.scot/support-regulations/control-of-woodland-removal>

- The safe and efficient use of the Glasgow Airport, flight activity, navigation, flight paths and Ministry of Defence surveillance system.
- Figure 10 identifies areas across Renfrewshire with potential for heat networks based on existing energy demand and proximity of existing energy resources.

All Major Development planning applications will require to consider the feasibility of meeting the development's heat demand through a district heating network or other low-carbon alternatives. New development located next to significant heat sources will be designed so that it can connect to an existing heat network or a wider planned network at a future date. Any land required to deliver the heat network will be protected and incorporated into the design and layout of the proposed development. Where a heat network is not viable, the use of micro-generation and other heat recovery technologies will be encouraged"

LDP2 Draft Supplementary Guidance

5.107 Consideration has also been given to the draft Supplementary Planning Guidance documents associated with the LDP2. Of relevance to the EDM Project is the **New Development Supplementary Guidance (2019)**. As with the adopted SG as described in 5.85 above, the draft New Development SG (2019) is structured around five themes: economy, centres, infrastructure, places and environment. Policy considerations such as flooding and drainage; environment development criteria; green belt; natural heritage; international, national and local designations; and built heritage are further covered in the SG.

Committed Development

5.108 A 'committed development' is considered to be a development that has either full planning permission, planning permission in principle, or is allocated in an approved strategic development plan or in an adopted local development plan. As existing developments located within a 150m 'trigger zone for consideration' of a proposed route were included as a routing/siting criterion for the New 132kV OHL, further committed development within this distance was also identified, with attention focussed only on residential developments, other potentially sensitive receptors and tall structures.

5.109 Committed developments were identified through consultation with both Inverclyde Council and Renfrewshire Council who provided the planning application boundaries for the area, which were subsequently mapped to identify the location of potential developments more accurately⁷.

⁷ The search was updated March 2020