



Loco₂gen
Renewable energy specialists

Locogen Consulting Limited

4 West Silvermills Lane,

Edinburgh,

EH3 5BD.

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Planning Services,
North Ayrshire Council,
Cunninghame House,
Irvine,
KA12 8EE

Proposed Solar Farm at Glenkiln, Lamlash, Isle of Arran, KA27 8NT: Screening Request (on behalf of Arran Community Renewables, ACR)

Dear Sir or Madam,

I am writing under the Town and Country Planning (Environmental Impact Assessment) (Scotland) Regulations 2017 to seek a formal Screening Opinion under Part 2 of these regulations for a proposed solar farm near Lamlash, Arran. A map showing the general scale and location of the proposed development is attached in Appendix 2 (current working layout of the development).

The proposed site is currently low-value agricultural land utilised for sheep grazing with some areas of scrub. The proposed development would involve the installation of a solar farm with a maximum generating capacity of approximately 6MWp DC, and a maximum site area of approximately 6.8 ha spread over one field. There are no notable watercourses, hedgerows, trees nor woodland within the site boundary, and the applicant has designed the site such that the proposed development is set back considerably from the watercourse and woodland which borders the site's western boundary.

Whilst solar farms are not specifically mentioned under Schedule 2 of the regulations, Column 1 of Schedule 2 does list '(a) Industrial installations for the production of electricity, steam and hot water (unless included in Schedule 1)' and Column 2 establishes that if the area of such a development exceeds 0.5ha then it should be considered under Schedule 2. As a development which will generate electricity and will be above 0.5ha. Locogen Consulting Ltd have taken the precautionary approach of seeking a screening opinion for this proposed development.

Appendix 1 to this letter sets out Locogen's assessment of the proposal under the terms of Schedule 3 of the regulations and has concluded that the development is not one

which needs to be accompanied by a formal Environmental Impact Assessment. Instead, an application for development will be supported by sufficient environmental information as the applicant and the planning authorities agree necessary to make a determination under the Planning Acts having due regard to the requirements of the respective development plans.

Where additional assessments may be required this has been identified in Appendix 1. We would propose to agree the scope of these works as part of ongoing discussions between ourselves over the next few weeks and months.

It is noted in this respect that a pre-application application meeting has already taken place with North Ayrshire Council in January 2024 with a generally positive reception. The applicant would welcome any additional advice that North Ayrshire Council may wish to provide at this stage.

Yours sincerely,

Amy Crum

Principal Consultant (Locogen)

Appendix 1

SCHEDULE 3 SELECTION CRITERIA FOR SCREENING SCHEDULE 2 DEVELOPMENT

In seeking this Screening Opinion consideration has been given to Schedule 3 of the EIA Regulations 2017. The format of this request therefore follows the criteria set out in the order they appear in that Schedule.

1. Characteristics of development

The characteristics of development must be considered with particular regard to—	Applicants Initial Assessment
<p>(a) the size and design of the development;</p>	<p>The proposed development will take up one agricultural field utilised for sheep grazing totalling a maximum of approximately 6.8 ha. The project has been designed so as to fit within the existing field boundary, which in turn provides pre-existing containment from visual receptors in the surrounding area. The panels will be mounted on frames which will be no higher than 3.5m in height.</p> <p>It is concluded that the proposal would not require EIA as a result of this consideration.</p>
<p>(b) cumulation with other existing development and/or approved development;</p>	<p>There are no known ground-mounted solar developments nor proposals on the Isle of Arran.</p> <p>Regarding other developments, there is a small hydro adjacent to the site (well screened from any views). There is a proposal for new housing c. 500m east of the site. The proposed development area itself has no allocations in the North Ayrshire Council Local Development Plan (2019).</p> <p>It is therefore concluded the cumulative impacts are considered negligible.</p>

	<p>It is concluded that the proposal would not require EIA because of this consideration.</p>
<p>(c) the use of natural resources, in particular land, soil, water and biodiversity;</p>	<p>Whilst there will be some limited minor impact on soil from the installation of the plant the ongoing operation of the plant will not have any long terms significant effects on the considerations listed.</p> <p>Assessments of the ecology, landscape, agricultural land and hydrology will be undertaken and presented alongside the proposed planning application.</p> <p>It is concluded that the proposal would not require EIA as a result of this consideration.</p>
<p>(d) the production of waste;</p>	<p>The proposed development will not generate significant levels of waste during its operational period. At the end of its lifetime plant will be removed from site and where possible components reused or recycled in line with requirements at that time.</p> <p>It is concluded that the proposal would not require EIA as a result of this consideration.</p>
<p>(e) pollution and nuisances;</p>	<p>The proposed development will not result in significant levels of pollution or nuisances. A noise assessment will accompany the application to ensure that noise generated by the inverters used on the site will not exceed required levels at the nearest noise sensitive properties.</p> <p>It is concluded that the proposal would not require EIA as a result of this consideration.</p>

<p>(f) the risk of major accidents and/or disasters which are relevant to the project concerned, including those caused by climate change, in accordance with scientific knowledge;</p>	<p>On the basis that the proposed development will generate electricity from a renewable source its intention is to address and in doing so help to avoid the natural disasters which might otherwise arise from doing nothing to deal with climate change. No other major disasters are considered likely as a result of this development, however a glint and glare assessment will be undertaken to ensure that and the local residents living close to the site are not adversely affected.</p> <p>It is concluded that the proposal would not require EIA because of this consideration.</p>
<p>(g) the risks to human health (for example due to water contamination or air pollution).</p>	<p>The proposed development will not give rise to contamination or pollution which would present a risk to human health.</p> <p>It is concluded that the proposal would not require EIA because of this consideration.</p>
<p>Overall, it is concluded that the Characteristics of the proposed development would not give rise to a level of environmental impact or impacts which would require an EIA to be undertaken.</p>	

2. Location of development

The environmental sensitivity of geographical areas likely to be affected by development must be considered, with particular regard, to the following:

<p>The environmental sensitivity of geographical areas likely to be affected by development must be considered having regard, in particular, to—</p>	<p>Applicants Initial Assessment</p>
<p>(a) the existing and approved land use;</p>	<p>The area is currently agricultural land utilised for sheep grazing. The proposed development offers the potential for continued sheep grazing under and alongside the proposed development.</p> <p>It is concluded that this locational consideration would not require EIA for this application.</p>
<p>(b) the relative abundance, availability, quality and regenerative capacity of natural resources (including soil, land, water and biodiversity) in the area and its underground;</p>	<p>The natural biodiversity of the site would improve through positive land management during the operational phase of the proposed development whereafter a decision could be made as to whether to repower the site or return it to agricultural land or other uses.</p> <p>It is concluded that this locational consideration would not require EIA for this application.</p>
<p>(c) the absorption capacity of the natural environment, paying particular attention to the following areas—</p>	<p>In general terms the ability of the site to absorb this level of development has been a primary consideration during the site finding and design process. Detailed consideration of the criteria listed is provided below.</p> <p>It is concluded that this locational consideration would not require EIA for this application.</p>
<p>(i) wetlands, riparian areas, river mouths;</p>	<p>The proposed development area is located near to Benlister Burn (which hosts a small hydro scheme). Solar panel setbacks to this watercourse will be implemented in the proposed development's design stage. An assessment of hydrological impacts will support the planning application.</p> <p>It is concluded that this locational consideration would not require EIA for this application.</p>

<p>(ii) coastal zones and the marine environment;</p>	<p>The site is located >1km from any tidal areas. It has therefore been concluded that there will be no interaction and or direct effects arising from the proposed development on the marine environment or any associated natural coastal zones.</p> <p>It is concluded that this locational consideration would not require EIA for this application.</p>
<p>(iii) mountain and forest areas;</p>	<p>There are no mountain or significant forest areas affected by this site and as such this has been scoped out of further consideration. Proposals for the protection and enhancement of trees and hedgerows will be provided in support of the planning application.</p> <p>It is concluded that this locational consideration would not require EIA for this application.</p>
<p>(iv) nature reserves and parks;</p>	<p>The proposed development is not close to any nature reserves or parks, therefore it is considered that there will be no direct or significant indirect impacts on any such area.</p> <p>It is concluded that this locational consideration would not require EIA for this application.</p>
<p>(v) European sites and other areas classified or protected under national legislation;</p>	<p>There is one European and nationally designated area located within 500m of the proposed development, namely the Arran Moors SPA & SSSI. This SSSI has substantial land-take, covering c. 6,380ha (14.8% of the island's land).</p> <p>Benlister Glen (SSSI), Gleann Dubh (SSSI) and South Arran (Marine protection area) are also within 2km of the site.</p> <p>Given the nature of the development, it is anticipated that there is sufficient separation between the proposed development and any designations that they will not be directly nor significantly affected by this site. This will be confirmed through the assessments supporting the planning application.</p> <p>It is concluded that this locational consideration would not require EIA for this application.</p>

<p>(vi) areas in which there has already been a failure to meet the environmental quality standards, laid down in Union legislation and relevant to the project, or in which it is considered that there is such a failure;</p>	<p>There are no environmentally degraded areas affected by this site and as such this can be scoped out of further consideration.</p> <p>It is concluded that this locational consideration would not require EIA for this application.</p>
<p>(vii) densely populated areas;</p>	<p>The site is within 1km of Lamlash. An assessment of residential amenity will be undertaken in support of the planning application.</p> <p>It is concluded that this locational consideration would not require EIA for this application.</p>
<p>(viii) landscapes and sites of historical, cultural or archaeological significance.</p>	<p>There are no known landscapes or sites of historical, cultural or archaeological significance directly affected by this site, however there are several significant cultural heritage assets from which there may be some visibility, namely:</p> <ul style="list-style-type: none"> • Holy Island (Landscape Value); • Meallach's Grave (Scheduled Ancient Monument); • Lamlash (Conservation Area); and • Various listed buildings at Benlister & around Lamlash. <p>The setting of these sites are not considered likely to be significantly impacted due to screening and/or distance from the site. Nevertheless, an assessment of landscape and cultural heritage will be undertaken in support of the planning application.</p> <p>It is concluded that this locational consideration would not require EIA for this application.</p>
<p>Overall, it is concluded that the Location of the proposed development would not give rise to a level of environmental impact or impacts which would require an EIA to be undertaken.</p>	

3. Types and characteristics of the potential impact

The likely significant effects of the development on the environment must be considered in relation to criteria set out in paragraphs 1 and 2 above, with regard to the impact of the development on the factors specified in regulation 4(3), taking into account—

- a) the magnitude and spatial extent of the impact (for example geographical area and size of the population likely to be affected);
- b) the nature of the impact;
- c) the transboundary nature of the impact;
- d) the intensity and complexity of the impact;
- e) the probability of the impact;
- f) the expected onset, duration, frequency and reversibility of the impact;
- g) the cumulation of the impact with the impact of other existing and/or approved development; and
- h) the possibility of effectively reducing the impact.

Applicants Initial Assessment

Having undertaken initial desk-based assessments as well as initial surveys and site walkovers to consider potential impacts arising from the development on the factors specified in Regulation 4(3) it is the applicant's view that none of the potential impacts arising from the construction or operation of the proposed development are likely to be of such a scale, magnitude, nature, intensity, duration as to be considered significant enough to warrant an EIA being undertaken for this proposed development.

Any impacts arising will be sufficiently small in scale, localised in nature and ultimately reversible that they can be appropriately assessed as part of the Town and Country Planning process without recourse to full Environmental Impact Assessment.

The applicant will also demonstrate the extent to which they have sought to include opportunities to mitigate potential impacts through enhancement measures within the design and implementation of the proposed development.


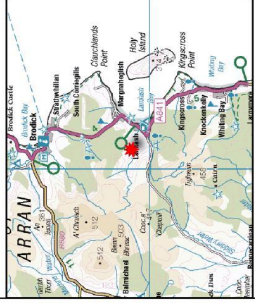

In doing so the applicant will have due regard to the requirements of the development plans and frame any assessments in such a manner as to address the specific requirements of these plans.

Consideration will also be given to the contribution of the proposed development to meeting Climate Change and Net Zero objectives set out by government since 2017 when the EIA Regulations came into force. The extent to which the Local Authority has adopted these measures will also be a material consideration in determining this application.

Overall, it is concluded that the **type and characteristics of the potential impacts** arising from the proposed development would not give rise to a level of environmental impact or impacts which would require an EIA to be undertaken.

Appendix 2: Plan of the Proposed Development



 <p>Loco2gen Consulting Ltd, 4 West Silverdale Lane, Edinburgh, EH3 5BD Tel: +44 (0) 131 555 4945; Email: info@loco2gen.com Company Number: SC521039; VAT Number: 228851291</p>	<p>Legend</p> <ul style="list-style-type: none"> Total Development Area Land boundary (indicative) Solar footprint Indicative customer & DNO substations
	
<p>0 0.03 0.06 0.09 0.12 km </p> <p>A3 Horizontal Scale 1:2,500</p> <p>CRS: British National Grid (EPSG:27700)</p> <p>Produced: Amy Crum Reviewed: Euan Hutchison Approved: Euan Hutchison Date: 30/01/24 Revision: 2.0</p> <p>7340-DRAW-DES-0001-Location Plan-v2.0</p>	
<p>DES-001 Glenkiln Solar Location plan</p>	
<p>Locogen Consulting Ltd</p>	

Appendix 3: Local planning considerations

