Appendix 2 – West Dunbartonshire Consultation Response to Scottish Government Energy Consents Unit.

Section 36 application ref: ECU00004982 - Construction and operation of a 560MW Battery Energy Storage System with associated infrastructure, substation, security fencing, CCTV, security lighting and landscaping on Land at Cochno Road, Bearsden, East Dunbartonshire - project name Whitehall BESS.

West Dunbartonshire Council **objects to the above proposal** as neighbouring Planning Authority. Full details of the Council's consideration of the development proposal are set out below.

Context

An application has been made to the Scottish Ministers under Section 36 of the Electricity Act 1989 (as amended) for the construction and operation of a battery energy storage facility with a maximum power output of 560 megawatt. The application site is located within the East Dunbartonshire local authority area and the assessment of the application proposal is undertaken via the Scottish Government Energy Consents Unit. West Dunbartonshire Council has been consulted as neighbouring planning authority with the application site lying generally to the north of the local authority boundary.

Site description and development proposal

Extending to approximately 29 hectares, the proposed site is situated on land at Whitehall Farm, Cochno Road, East Dunbartonshire. The site lies immediately north and east of the local authority boundary which follows the line of Cochno Road at this location. The site itself is located within the open countryside comprising part of the Green Belt as defined by the adopted East Dunbartonshire Local Development Pan 2. To the south, the site is bound by Cochno Road with Whitehill Farm located directly adjacent to the southeast of the site. To the west, the site is bound by Cochno Road along its southern extent before following the general line of Lower Stourfold Glen. The northern and eastern boundaries of the site generally cut across open land before following the existing tree line to Cochno Road. The nearest residential properties within West Dunbartonshire are the houses directly opposite the site at Edinbarnet, Cochno Road. Properties at Craigton Street, Burnbrae Street, Craighaw Street and Field Road lie around 170 metres from the southernmost boundary of the proposed site. Loansdean, Cochno Road is around 200 metres from the site.

The proposal is for a 560 MW Battery Energy Storage Facility with associated infrastructure. It is indicated that the development would have an operational lifespan of 40 years. The proposed development would comprise a number of containerised units to house battery energy storage systems and associated ancillary infrastructure. Each container will have the appearance of a standard metal ISO/shipping container and it is indicated these will be soundproof. The containers would be arranged in parallel banks, and would likely be finished in dark grey or green and would be prefabricated off-site. The containers would be accessed via an external galvanised

metal open grid walkway supported by stairs and railings. The dimensions of the containers would be approximately 2.6m x 2.4m x 12.2m (height x depth x width). The containers together with other equipment will be placed on concrete plinths. In the submitted documents that concrete will be installed in a manner which can be removed at the end of the development's life cycle, to return the land to agricultural use. The proposal would see 224 containers in total. It is further indicated that there will be 1 inverter per container and 1 transformer per 2 containers giving a total of 224 inverters and 112 transformers, arranged in formation alongside the containers. The transformers and inverters will measure approximately 2.7m x 1.4m x 2.6m, and 2.3m x 1.4m x 1.5m respectively. Underground cables would connect the facility to the grid off-site at Drumchapel and Windyhill substations. A substation measuring 3.9m x 3.7m x 13.6m is to be located in the located to the south of the site. All structures and development as laid out above will be enclosed within an acoustic fence, proposed to stand at 4m high.

A 4m wide access road will be installed, with the proposed access point to Cochno Road located on the western edge of the site. It is indicated that landscape proposals for the site will seek to enhance existing landscape features, screen views of the battery containers and enhance biodiversity.

Battery Energy Storage Solutions provide a means of allowing for the storage of energy at times when generating stations are working at full capacity which can then be released when additional power is needed within the grid during peak times or when energy generation has dropped. As more energy sources are now renewable, such as wind and solar, balancing generation versus demand is a critical issue for grid stability. Battery storage allows energy to be stored during peak renewable generation periods and released when demand outstrips generation. In short, the proposed battery takes in generated electricity when there is a surplus and stores it until there is a demand for electricity which can be released to meet this demand.

The applicant has submitted a number of supporting documents with the application to the Energy Consents Unit, including a supporting planning statement, design and access statement, flood risk assessment, historic environment assessment, preliminary ecological appraisal, transport statement, noise impact assessment, battery safety management plan and landscape and visual impact assessment.

Appraisal

This application has been submitted to the Scottish Government under Section 36 of the Electricity Act 1989, as it is development with a generating capacity of over 50MW. Under the terms of Section 25 of the Town and Country Planning (Scotland) Act 1997, all applications must be determined in accordance with the development plan unless material considerations indicate otherwise. In this instance, the application is made under the Electricity Act 1989 and therefore the Development Plan does not have the primacy in the determination of the application. It does, however, provide a basis for the assessment of this proposal and it is established practice to take the development plan into account in such decisions. The development plan comprises National Planning Framework 4 and adopted East Dunbartonshire Local Development Plan 2.

Principle of Development

National Planning Framework 4 (NPF4) sets out the long-term vision for the development of Scotland through the National Spatial Strategy. NPF4 aims to meet Scotland's climate ambition which will require a rapid transformation across all sectors of the economy and society. This proposal constitutes a National Development as it supports renewable electricity generation, repowering, and expansion of the electricity grid under National Development 3: Strategic Renewable Electricity Generation and Transmission Infrastructure. NPF4 recognises that additional electricity generation from renewables and electricity transmission capacity of scale is fundamental to achieving a net zero economy. Policy 1 states that there is a need to encourage, promote and facilitate development that addresses the global climate emergency and nature crisis, whilst Policy 2 seeks to encourage, promote and facilitate development that minimises emissions and adapts to the current and future impacts of climate change. The electricity transmitted for storage within the proposed batteries will have come from a mixture of renewable and non-renewable sources with the purpose of the batteries to ensure there is always grid stability. As renewable energy becomes more prevalent, grid stability becomes a significant issue due to the intermittent nature of renewable energy generation.

Whilst the Council considers that the proposal could therefore be held to support the overarching aims of the NPF4 to achieve net zero targets and provide a stable domestic energy supply, it must be ensured that such development happens in the right place. Therefore, it must be assessed if there are any potential adverse impacts upon West Dunbartonshire resulting from the proposed development which would be outweighed by any benefits. Policy 11(e) of NPF4 sets out in detail the matters for the project design and mitigation to address.

Landscape and Visual Impact and impact on the Green Belt

The site is situated within the Green Belt to the north of the settlement of Faifley. Policy 8 of NPF4 sets out the types of development that are supported within the Green Belt locations. This includes essential infrastructure and proposals that relates to the distribution and transmission of electricity grid networks fall under this definition. However, Policy 8 is clear that for development proposals in Green Belt locations, the purpose of the Green Belt must not be undermined. Policy 11 additionally seeks to encourage, promote, and facilitate all forms of renewable energy development, including energy storage and distribution infrastructure. The policy sets out a range of criteria that proposals should be assessed against to ensure the impact of the project design and mitigation is addressed. This includes ensuring there is no adverse impact on landscape and visual impact.

Policy 8 requires that the reasons why the Green Belt is essential must be provided together with why the development cannot be provided on a site outwith the Green Belt. The applicant advises that the site has been chosen due to it's proximity to appropriate grid connections. While this is accepted from a technical perspective, the applicant has not provided any analysis of other site options that were considered outside of the Green Belt and why it was not possible to locate them in an alternative place. It therefore cannot be concluded that no other suitable sites are available in a location outwith the Green Belt.

Policy 8 further requires that proposals must be compatible with the established countryside and landscape and be designed to ensure that it is of an appropriate scale, massing and external appearance to minimise visual impact upon the Green Belt. That a development of this nature would have a visual impact is not in doubt. The applicant's Landscape and Visual Impact Assessment (LVIA) acknowledges that the baseline landscape character of the site would be altered as a result of the proposed development bringing adverse effects on landscape character, during both the construction and operation phases. It is identified in the LVIA that the development would introduce built elements which would be evident in its immediate landscape setting. The Council is concerned at the potential for the industrial character of the development and the harm to the visual harm to the locality, resulting in the industrialisation of the Green Belt at this location. Whilst the proposed landscape mitigation is acknowledged, the site is in close proximity to the settlement boundary of Faifley and visually, the development will likely be viewed in the context of the adjacent settlement. It will likely have negative impacts on landscape and natural setting of the Green Belt, potentially having an adverse visual impact. Whilst the development is identified as being temporary, there are no details of decommissioning or restoration. With a possible development lifespan of up to 40 years, any impacts from the operational phase of the development will occur over a long period of time.

The Council is of the view that the applicant has not demonstrated that there are no other suitable sites are available in a location outwith the Green Belt. The Council also considers that the industrial character of the development will result in visual harm to the locality resulting in the industrialisation of the Green Belt. This would not be acceptable. The development cannot, therefore, be held to be supported by Policies 8(a)(ii) and 11(e)(ii) of NPF4.

Impact upon the Kilpatrick Hills

Notwithstanding visual impact considerations within the Green Belt, the potential impact on the landscape character and features of the Kilpatrick Hills Local Landscape Area (LLA) must also be considered. The proposed site is approximately 270m away from the boundary of the LLA. The 'Statement of Importance', which is the evidence underpinning the LLA explains that the lower slopes of the Kilpatrick Hills contribute to its setting, by acting as an important landscape buffer. The designation contains areas of lower slopes to protect the setting of the hills, meaning the proposed development site is removed from this buffer.

The theoretical zone of visibility in the applicant's LVIA does include southern areas of the LLA. One of the special landscape qualities of the LLA is the long views across the Glasgow conurbation, which emphasise the contrast between remote uplands and developed lowlands. Visually intrusive development between the conurbations and the Kilpatrick Hills could erode this special quality. The LVIA assesses that there would be negligible impact stating the development is unlikely to be visible from the viewpoint. Further, the tree screening mitigation would further reduce the visibility once established.

Given that the site is some distance from the designation boundary and visibility is expected to be low from the LLA, the Council considers that based on the assessment within the submitted LVIA, it is unlikely there will be an adverse impact on the Kilpatrick Hills

Ecology, biodiversity and protected species

Policy 3 of NPF4 seeks to protect biodiversity, reverse loss, deliver positive effects from development and strengthen nature networks. Policy 4 seeks to protect, restore and enhance natural assets, making best use of nature-based solutions. The policy is primarily focused on designated areas including sites designated as a local nature conservation site or landscape area. Policy 11 also requires biodiversity impact to be addressed. The applicant has submitted a preliminary ecological appraisal in support of the proposal and this primarily assesses impacts upon the proposed site. The appraisal does not identify the adjacent Local Nature Conservation Sites (LNCS) within West Dunbartonshire, as set out on the proposals map of proposed LDP2. These comprise of three LNCS areas; Edinbarnet woodlands and Wester Cochno Parkland both of which area adjacent to the proposed site, and Wester Cochno Burn.

The Council's Biodiversity Officer advises that West Dunbartonshire Council has undertaken a two year nature restoration project within the area known as Auchnacraig Estate (which is comprised of the three LNCS above), and on Faifley Knowes to the south. Both Auchnacraig and Faifley have now been connected by a new native woodland which straddles the hillside to the east of Douglas Muir Road. This has created an integrated habitat which connects the urban environment to wider Green Belt and the Kilpatrick Hills LLA. The Council's Biodiversity Officer further advises that to the northwest of the site, Glasgow University at Cochno Farm have also been carrying out a number of nature restoration works including a large scale planting programme as well as a private forestry grant development north of Duntocher.

Collectively all the work put in by the various agencies in this location has resulted in landscape and nature restoration around the proposed development site. Assessing the potential impact upon the three LNCS making up Auchnacraig Estate, Auchnacraig wood is a semi-natural broadleaved woodland with a number of veteran broadleaved and conifer trees. Parts of the woodland has been established for a long time, with parts of it thought to be ancient woodland associated with the former Auchnacraig estate. Other woodland is younger native broadleaved woodland planted over the past 20 years. Diverse semi-natural woodlands of this size and age are uncommon locally, making this site important for nature conservation. Its value is enhanced by the fact that it is located on the fringe of an urban environment where wildlife habitats tend to be small and of low diversity. The Council's Biodiversity Officer advises that the woodland will have a positive effect on the surrounding environment as it will provide a reservoir of species which can migrate into surrounding areas when conditions are suitable.

The Council's Biodiversity Officer further advises that a Phase 1 survey carried out at Auchnacraig recognised the importance of the varied mosaic habitats. Areas of wetland pockets were found throughout the Estate. The Estate features the Cochno burn from which a wildlife pond is supplied and this has also been restored for wildlife as part of the habitat restoration project. Any proposed development to the north of the site may have an impact on the hydrology of the LNCS site and this requires to be assessed.

Considering specific species, the Council's Biodiversity Officer advises that evidence of badger foraging and pine marten scat were found in 2023 surveys. Herpetofauna surveys of the pond were undertaken and include common toad in the species list. The open mosaic habitat is suitable for hedgehog and previous records of local bat surveys on the site have found both common and soprano pipistrelles as well as daubentons. Previous records of otter and watervole exist for both the Cochno and Hardgate burns. Recent watervole surveys have reconfirmed their presence at Faifley thus the development site requires to be considered for watercourse and fossorial watervole as they are within the distribution range of the proposed site.

It is therefore possible that all of the above species found within West Dunbartonshire to the immediate west and south of the site could potentially be using the proposed development site. The Council's Biodiversity Officer advises that further species specific surveys require to be carried out in respect of the proposed development site. Issues such as adverse noise, vibration, lighting and hydrology pollution are not discussed in the PEA and also require to be examined.

In terms of biodiversity enhancement, the proposed area is also a mixed habitat and wet and marshy sections should not be given over to inappropriate tree planting under the role of biodiversity enhancement, as these are valuable habitats of their own accord.

Overall, the applicant's preliminary ecological appraisal has been considered by the Council's Biodiversity Officer and this fails to identify the adjacent LNCS within West Dunbartonshire and assess the potential cross boundary impact upon ecology, biodiversity and protected species within West Dunbartonshire. It therefore cannot be concluded that adverse impacts would not occur within the West Dunbartonshire area. The Council does not consider that the proposal can be held to be supported by Policies 3, 4 or 11(e)(ix) of NPF4.

<u>Residential amenity</u>

There is the potential for amenity impacts to occur to residents within West Dunbartonshire, with the closest residential properties being at Edinbarnet on Cochno Road, immediately to the west of the site. Infrastructure within the site would be situated around 90 to 100 metres from these properties. Further properties lie to the northern edge of Faifley, approximately 170 metres from the proposed site. The site equipment itself is around 280 metres these residential properties in Faifley together with Loansdean on Cochno Road. The applicant, however, requests micro-siting of up to 100 metres and this could result in the proposed infrastructure being substantially closer to nearby properties than the current layout suggests. The site entrance will be taken from Cochno Road, opposite the properties at Edinbarnet.

Policy 11 of NPF4 requires that impacts on communities and individual dwellings including residential amenity, and noise are addressed. A noise impact assessment (NIA) has been submitted in support of the proposal and this has been considered by the Council's Environmental Health Service. A number of points are highlighted with respect to the noise impact assessment. It is noted that the predicted noise is higher at one receptor during the night but lower at other receptors. It is questioned whether this is correct and the cause of this requires to be clarified. It is further noted that the noise impact assessment applies a 2dB penalty for tonality being just perceptible at

the receptors. For cooling plant associated with battery storage an assessment and discussion of NR curves as per the REHIS development guide quoted in the Noise Assessment is expected. In the absence of this, it cannot be concluded that no adverse impact will occur to residential properties.

In further assessing the noise assessment, Para 4.6.2 states that mitigation is required to ensure compliance with the BS4142 assessment for daytime noise. It is not clear from the results how this conclusion has been reached and furthermore there is no discussion or suggestion of suitable mitigation and its predicted effectiveness. The Council's Environmental Health Service note that the applicant has stated that there should be flexibility around the siting of the equipment within the site boundary, with micro siting of up to 100 metres. There is no acknowledgement of this within the NIA. Any impacts from different configurations of equipment requires to be fully discussed and assessed. In the absence of this, the Council considers that it is not considered that it has been demonstrated that there will be no unacceptable impact on neighbouring amenity resulting from the operation of the development. It is not therefore considered that the potential impacts from noise are addressed in accordance with Policy 11(e)(i).

Any construction project will result in an element of noise and disturbance. In order to manage any potential noise disturbance during the construction phase of the development, in the event that consent was granted, the Councill would seek a that construction work and any ancillary operations are restricted to between 8am to 6pm Monday to Friday and 8am to 1pm on Saturday. No working should be permitted on Sundays or public holidays, including local holidays within the West Dunbartonshire Council area.

Traffic and Road Safety

Policy 11 of NPF4 requires the impacts on road traffic to be appropriately addressed, including during construction. Access to the site will be taken from the A811 via Cochno Road which is partly within the West Dunbartonshire boundary. The site access itself will adjoin a West Dunbartonshire section of Cochno Road. A 24 month construction phase is identified and the applicant's transport statement advises that the construction phase of the development would generate around 109 two-way movements per day during the first three months (218 individual movements), with daily movements decreasing thereafter.

The applicant's Transport Statement sets out that a review of Cochno Road outlines how the carriageway has a suitable width to allow for simultaneous two-way movement, from its junction with the A810 towards the access of Law Farm. Beyond this towards the site, Cochno Road is predominantly single track, measuring circa 3.5m width. There are four formal passing places between the site and the Law Farm access, which could be used to allow small vehicles to pass in the event of conflict. Given the narrow width along sections of Cochno Road, with limited space to widen the carriageway to provide passing places for HGVs, it is proposed to stagger arrivals and departures. A detailed Construction Traffic Management Plan (CTMP) would be developed. It is advised that no HGV movements will occur at the site during peak hours, in addition to the school closing hour. It is further advised that there will be no construction vehicle movements directly to the west of the site along Cochno Road. Overall, the applicant does not consider that the proposals would result in a severe

impact upon the local road network. Once operational, the applicant anticipates between 10 and 20 vehicle trips to the site per annum.

The Council's Roads Service has considered the proposal and does not identify any issues or objections. It is noted that a detailed CTMP will be prepared by the applicant and the Council requests that in the event that the Scottish Ministers were minded to grant consent, this is conditioned including a requirement for any CTMP to be agreed with West Dunbartonshire Council due to the proximity of the site to the Council area and use of the road network within the Council area.

Impact upon the core path network

Policy 11 of NPF4 requires matters relating to public access including long distance walking and cycling routes and scenic routes to be suitably addressed. A variety of core paths connect Faifley to the open countryside via Cochno Road. The applicant's supporting documents identifies East Dunbartonshire core path ED/153/1 which is located to the south and east of the site and extending northeast from Cochno Road, noting that only minor visual effects would occur in respect of users of this core path. This East Dunbartonshire Core Path connects with the West Dunbartonshire Core Path network to the opposite side of Cochno Road. The applicant's submission does not consider the impact on the core path network and connections to the core path network within West Dunbartonshire. While no routes are physically interrupted by the proposal, there will be a visual and noise impact to users of the routes and the character of the routes will be changed. The Council considers that there is the potential for there to be adverse visual amenity impacts on core path users. Whilst landscape mitigation could seek to reduce the visual impact, the overall feeling of being in the wider countryside and in 'nature' would be lost should the proposal proceed. Cochno Road acts as a connection between all of these routes and the impact of construction traffic to users of these routes has not been considered or addressed. The Council does not consider that the potential impact upon the core path network has been addressed as required of Policy 11(e)(iii).

Flood risk

Considering matters relating to flood risk, a flood risk assessment has been submitted in support of the proposal. This does not identify the site itself as being as unacceptable risk of flooding. The proposed development is also not predicted to increase surface water runoff or flooding to the surrounding catchment. It is noted that in a consultation response to the Energy Consents Unit, SEPA offer no objection on the grounds of flood risk.

Built and cultural heritage

The application is accompanied by a desk-based assessment of the historic environment, which identified three heritage assets relevant to West Dunbartonshire: Edinbarnet House which is a Category B listed building, the Scheduled Monument Cochno Cup and Ring Marked Stone, and the Antonine Wall World Heritage Site buffer. Historic Envirobnment Scotland (HES) in their consultation response to the Energy Consents Unit notes that there are no designated heritage assets are located within the development site application boundary. HES are therefore satisfied that there will not be any direct impacts. HES also specifically consider the potential for impact on both the Cochno Stone and Antonine Wall buffer zone and conclude that any impact on their setting is not likely to be significant. Being guided by the response

from HES, the Council is therefore content that there is no significant impact on historic assets within or adjacent to West Dunbartonshire. Potential archaeological matters within the site would be for the Scottish Ministers to consider.

Health and safety

The applicant acknowledges that there are potential hazards associated with HV electrical systems and BESS facilities, such as a fire and thermal runaway event, which could result in the formation of harmful gases. In response to this, an Outline Safety Management Plan Design has been submitted in support of the proposal. This details the operational measures, which will be included to mitigate hazards and reduce the risks to people and the environment. The key measures which will be installed to reduce risk at the BESS include the use of systems to monitor the operation of the BESS and continuously observe the temperature, voltage and other process parameters. These will immediately alert operators to potential issues. It is advised that in the event of a problem occurring, battery sections can be readily isolated automatically. A fire and gas detection system will be installed alongside conventional fire, heat and gas detectors, for the early detection of a fire event. An automatically operated fire suppression system will also be installed. It is for the Scottish Ministers to satisfy themselves that an unacceptable risk does not occur and to inform this assessment, the Council would expect the Scottish Fire and Rescue Service to be consulted on the application proposal. It is noted at the time of writing, no consultation response is available online from this organisation.

Site Decommissioning and Restoration

Policy 11(e)(xi) of NPF4 requires matters relating to the decommissioning of developments, including ancillary infrastructure, and site restoration to be addressed. The applicant has indicated that the intended lifetime of the proposal is 40 years, after which the facility will be decommissioned and the land restored to its former state. However no other information regarding this has been submitted. It is essential that given the type of development together with its size and location, that full details of de-commissioning and site restoration is provided to ensure that the requirements of Policy 11(e)(xi) of NPF4 are met.

In the event that the Scottish Ministers were minded to grant consent for the development, the Council considers that there is the requirement for a financial bond to ensure sufficient funds are available to decommission and restore the site. If the developer was to go out of business with unfinished works potentially being left this can be safeguarded by ensuring that a bond or other financial provision is to put in place to cover such an eventuality. The bond or other financial provision would address reinstatement works both in the event of a developer failing or being unable to complete restoration works together with any failure in the aftercare arrangements associated with the site restoration. The Council also considers that in the event that the development fails to export electricity to the grid for a continuous period of 12 months it will be considered to have become redundant and the components of the development removed and the site restored. In the event that consent was granted, the Council considers it essential that that this requirement is to be addressed by a condition.

Summary and conclusions

The Council consider that proposals such as this can be held to support the overarching aims of the NPF4 to achieve net zero targets and provide a stable domestic energy supply. The support as a national development is also acknowledged. However, it remains that such development require to be sited in the right locations and the benefits of such developments require to be balanced with any potential adverse impacts.

In considering the proposal, it is concluded that no concerns arise in respect of matters relating to the impact upon the Kilpatrick Hills, flood risk, roads and traffic, built and cultural heritage, and health and safety. However, a variety of concerns do arise.

In assessing the Green Belt location to the north of Faifley, the Council is of the view that the applicant has not demonstrated that there are no other suitable sites available in a location outwith the Green Belt. The Council also considers that the industrial character of the development would be to the visual harm of the locality resulting in the industrialisation of the Green Belt. Whilst landscape mitigation is proposed, any planting would take years to develop and mature, exacerbating the visual impact within the short to medium term. This is not considered acceptable or justified. The development cannot, therefore, be held to be supported by Policies 8 and 11(e)(i) of NPF4.

Turning to the impact upon ecology, biodiversity and protected species, the applicant's preliminary ecological appraisal fails to identify the adjacent LNCS within West Dunbartonshire and assess the potential cross boundary impact upon ecology, biodiversity and protected species within West Dunbartonshire. It therefore cannot be concluded that adverse impacts would not occur within the West Dunbartonshire area. Turning to the impact on the core path network, while no routes are physically interrupted by the proposal, there will be a visual and noise impact to users of the routes and the character of the routes will be changed. The Council considers that there is the potential for there to be adverse visual amenity impacts on core path users. The overall feeling of being in the wider countryside and outwith the built-up area would be lost. Cochno Road also acts as a connection between the various core path routes at this location and the impact of construction traffic to users of these routes has not been considered or addressed. The development cannot, therefore, be held to be supported by Policies 3, 4 and 11(e)(iii) and (ix)

With regard to residential amenity, the Council does not consider that it has been demonstrated beyond doubt that there would be no impact upon residential amenity within West Dunbartonshire by way of noise. Finally, the Council considers it essential that given the type of development together with its size and location, that full details of de-commissioning and site restoration is provided to ensure that the requirements of Policy 11(e)(i) of NPF4 are met.

West Dumbartonshire Council therefore **objects** to this proposal due to the above concerns relating to the Green Belt location of the development, visual impact, impact upon ecology, biodiversity and protected species, potential impact upon the users of the core path network, potential impact upon adjacent residential amenity and the failure to provide a decommissioning and restoration scheme. The Council does not

consider that the benefits of the proposed development outweigh any adverse impacts to the adjacent West Dunbartonshire area.