

WEST DUNBARTONSHIRE COUNCIL

Report by Chief Officer – Regulatory and Regeneration

Planning Committee: 8th May 2024

Subject: 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 - Section 36 application to Scottish Government Energy Consents Unit ref: ECU00004982

1. Purpose

- 1.1 To agree the Council's response to a consultation received from the Scottish Government Energy Consents Unit on behalf of the Scottish Ministers regarding a proposal for the construction and operation of a 560MW Battery Energy Storage System with associated infrastructure, substation, security fencing, CCTV, security lighting and landscaping.

2. Recommendations

- 2.1 It is recommended that the Council agrees to **object** to the above development and that the response contained in Appendix 2 forms this Council's formal response to the proposal.

3. Background

- 3.1 The Scottish Ministers received an application under section 36 of the Electricity Act 1989 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 however the assessment of the submitted application is undertaken via the Scottish Government Energy Consents Unit for the Scottish Ministers. West Dunbartonshire Council has been consulted as neighbouring planning authority with the application site lying generally to the north of the local authority boundary. The application is referred to under the project name of Whitehall BESS. The location of the site is shown in Appendix 1.
- 3.2 A date of 15th May 2024 has been agreed with the Scottish Government Energy Consents Unit for the submission of the Council's consultation response. The application documents are available to view via the Energy Consents Unit website via the following link: [Scottish Government - Energy Consents Unit - Application Details](#)

4. Main Issues

- 4.1** The site is situated on land at Whitehall Farm, Cochno Road, East Dunbartonshire and extends to approximately 29 hectares. It is located 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 Plan 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.
- 4.2** 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 it is indicated 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. 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 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.
- 4.3** 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.

- 4.4** 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. 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.
- 4.5** Appendix 2 comprises the recommended response to the consultation. 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. 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.
- 4.6** 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.
- 4.7** In assessing the Green Belt location to the north of Faifley, it is considered that the applicant has not demonstrated that there are no other suitable sites available in a location outwith the Green Belt. It is considered 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 considered unacceptable or unjustified. The development cannot, therefore, be held to be supported by Policies 8 and 11(e)(i) of NPF4.
- 4.8** Turning to the impact upon ecology, biodiversity and protected species, the applicant's preliminary ecological appraisal fails to identify the adjacent Local Nature Conservation Site (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. It is considered 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)

- 4.9** With regard to residential amenity, it has not been demonstrated beyond doubt that there would be no impact upon residential amenity within West Dunbartonshire by way of noise. Finally, it is considered 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.

5. People Implications

- 5.1** None.

6. Financial and Procurement Implications

- 6.1** There are no financial or procurement implications in terms of this report.

7. Risk Analysis

- 7.1** No risks have been identified.

8. Equalities Impact Assessment (EIA)

- 8.1** Not required.

9. Environmental Sustainability

- 9.1** Matters relating to environmental sustainability are fully considered via the application assessment.

10. Consultation

- 10.1** Responsibility for wider consultation on the submitted application rests with the Scottish Ministers and Energy Consents Unit as part of the application process.

11. Strategic Assessment

- 11.1** The following strategic priorities of the Council are relevant:

- Our Communities - Resilient and Thriving
- Our Environment - A Greener Future
- Our Economy - Strong and Flourishing

Alan Douglas
Chief Officer – Regulatory and Regeneration
Date: 8th May 2024

Person to Contact: James McColl, Development Management Team
Leader
Email: james.mcColl@west-dunbarton.gov.uk

Appendix 1: Location Plan
Appendix 2: Council's Consultation Response

Background Papers:

1. Application documents
2. National Planning Framework 4
3. Adopted East Dunbartonshire Local Development Plan 2

Wards affected: Adjacent Ward 4 (Kilpatrick)