

18 December 2024

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Dear Energy Consents Unit,

WHITEHALL BATTERY ENERGY STORAGE SYSTEM (BESS) – CONSTRUCTION AND OPERATION OF A 560MW BESS TOGETHER WITH ASSOCIATED INFRASTRUCTURE, SUBSTATION, SECURITY FENCING, CCTV, SECURITY LIGHTING AND LANDSCAPING ON LAND NEAR COCHNO ROAD, EAST DUNBARTONSHIRE, G81 5QS. GRID REFERENCE: X 251107, Y 673995

ECU REFERENCE: ECU00004982

We write with reference to our application under Section 36 of the Electricity Act 1989 for a 560MW BESS with associated infrastructure on land near Cochno Road, East Dunbartonshire, G81 5QS.

We are aware that West Dunbartonshire Council (WDC) has been consulted as an adjoining authority and that the authority has provided a formal response as part of this consultation process. WDC considered the proposal at its meeting of the Planning Committee on 11 December 2024 and resolved to maintain its original objection (albeit on reduced grounds).

Having reviewed this further formal response we are of the opinion that only 3 matters form the basis of the remaining objection which we address separately below.

Green Belt Location

We provide a document “*Additional Supporting Statement*” dated December 2024 which sets out the prevalent planning policy context against which BESS development proposals in the Green Belt should be assessed; the primary locational requirements of BESS development and analysis of the general area around the identified Point of Connection (POC) substation. This clearly demonstrates that a) BESS development is “essential infrastructure” for the purposes of applying Green Belt policy and b) no other sites within closer proximity to the POV are available which are outwith the Green Belt. In this context, the site of the proposed development is appropriate and fully justified.

Ecology and Environmental Impact

We provide an updated PEA which addresses the concerns raised in relation to impacts outside the application site. No further impacts have been identified and no additional mitigation is required. We would remind the ECU that the application has already been the subject of a Screening Request and the development has not been identified as EIA development. As such the application is not likely to lead to any significant environmental effects.

Post-Operational Treatment

WDC maintain an objection on the basis of the lack of detail on de-commissioning proposals when operations cease on site. In relation to this item, it is common practice that this is dealt with via pre-commencement planning condition, with detailed decommissioning information and bond to be agreed post-permission but prior to commencement of development. This is the approach commonly taken by the Energy Consents Unit (ECU) – see conditions 8 and 9 of the attached BESS decisions (Linwood and Stanely Water). It is clear from the above that the ECU is happy for a bond and decommissioning details to be agreed post-permission but prior to commencement of development. Such an approach should be adopted here.

We assume that the ECU will reconsult WDC and East Dunbartonshire Council on the basis of this information.

Yours sincerely,



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Development Director

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Enc: Additional Supporting Statement – December 2024
Updated PEA
Example decisions on decommissioning