

## WEST DUNBARTONSHIRE COUNCIL

Report by Planning, Building Standards and Environmental Health Manager

Planning Committee: 16<sup>th</sup> April 2025

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**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 a further updated consultation response following the receipt of further and updated details from the Scottish Government Energy Consents Unit, on behalf of the Scottish Ministers, in connection with 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 on land within the East Dunbartonshire Council area.

**2. Recommendations**

- 2.1 It is recommended the Committee agrees that the Council provides a further updated consultation response advising that the previous concerns have been addressed and that there is no longer an objection to the proposal as neighbouring Planning Authority based on the assessment of the matters specified in the response contained in Appendix 1, and that this response is submitted to form the Council's further updated position on 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 were 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 2.
- 3.2 The proposal was considered by the Planning Committee on 8<sup>th</sup> May 2024 and the Council issued a consultation response to the Scottish Ministers on 13<sup>th</sup> May 2024. The Council objected to the proposal due to the 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 did not consider that the benefits of the proposed development outweigh any adverse impacts to the adjacent West Dunbartonshire area.

- 3.3** Following the submission of the Council's objection, a revised proposal together with a range of additional and updated supporting documents have been submitted to the Scottish Ministers. These details included a revised site layout, revised equipment details, revised planting layout, a Landscape Statement, an updated Landscape and Visual Assessment, an updated Noise Impact Assessment and an Archaeological Investigation. Following consideration of the revised proposal by the Council's Planning Committee on 11<sup>th</sup> December 2024, the Council issued an updated consultation response on to the Scottish Ministers on 13<sup>th</sup> December 2024. In the updated consultation response, the Council considered that some aspects of the concerns which formed part of the original objection had been addressed, including visual impact and the impact upon residential amenity. However, the Council considered that the applicant failed to address other concerns relating to the Green Belt location of the development, impact upon ecology, biodiversity and protected species and the failure to provide a decommissioning and restoration scheme.
- 3.4** In response to the Council's updated consultation maintaining the objection on the points above, further supporting information has been received from the applicant in respect of the locational need for the Green Belt location together with an updated Preliminary Ecological Appraisal. The applicant also provides clarification on the approach to de-commissioning and restoration proposals. A date of 18<sup>th</sup> April 2025 has been agreed with the Scottish Government Energy Consents Unit for the submission of the Council's further updated consultation response. The application documents are available to view via the Energy Consents Unit website: <https://www.energyconsents.scot> and the following direct link: [Scottish Government - Energy Consents Unit - Application Details](#) . The additional details submitted are not available via the above link and are attached in appendices 5 to 7.

#### **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 Craighton 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 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 have been amended from being 2.6m x 2.4m x 12.2m, to being 2.9m x 2.4m x 6.1m (height x depth x width). Power conversion

system units are of the same size and take a similar appearance. The equipment will be provided in 64 banks of 6 units. It remains that the proposal will feature a control room, sub-station compound, sub-station building. Separate switchgear compounds are no longer proposed. The access point to the development also remains located on Cochno Road, to the western edge of the site.

- 4.3** 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.
- 4.4** Appendix 1 comprises the recommended updated consultation response. There is no change to the position of National Planning Framework (NPF) 4 since the Council's previous consultation response and it remains that 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.
- 4.5** In originally considering the proposal, it was concluded that no concerns arose 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. There is no change to this position which remains as per the original consultation response issued.
- 4.6** Following consideration of the original proposal, concerns did arise in respect of 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 and these points formed the basis of the Council's objection as agreed by Committee on 8<sup>th</sup> May 2024. A revised proposal together with a range of additional and updated supporting documents was subsequently submitted to the Scottish Ministers. It was considered that this revised proposal satisfactorily addressed the concerns relating to landscape and visual impact, residential amenity and the impact upon the core path network and, as agreed by Committee on 11<sup>th</sup> December 2024, the Council's objection on these matters was removed. However, the applicant failed to address other concerns the Council maintained its objection in respect of concerns relating to the Green Belt location of the development, impact upon ecology, biodiversity and protected species and the failure to provide a decommissioning and restoration scheme. The additional and updated details from the applicant seeks to address these remaining concerns.

- 4.7** Considering the Green Belt location, the applicant has provided additional details to justify the Green Belt location and set out why there are no suitable sites for this development outwith the Green Belt. The Green Belt location is required to take advantage of the availability of a grid connection at Windyhill sub-station. The distance of such developments from the grid connection is also an important consideration as the level of efficiency of the site reduces the further away from the connection it lies. Accordingly, the applicant has identified a 1.1km search area from the available connection in which no suitable sites exist outwith the Green Belt. It is now considered that the Green Belt location has been adequately justified, there are no suitable sites outwith the Green Belt which can take advantage of this connection and the impact within the Green Belt can be considered acceptable with reference to Policy 8 of NPF4.
- 4.8** Turning to the impact upon ecology, biodiversity and protected species, the applicant's preliminary ecological appraisal failed to identify the adjacent Local Nature Conservation Site within West Dunbartonshire and assess the potential cross boundary impact upon ecology, biodiversity and protected species within West Dunbartonshire. It therefore could not be concluded that adverse impacts would not occur within the West Dunbartonshire area. The applicant has now provided an updated Preliminary Ecological Appraisal which has been considered by the Council's Biodiversity Officer and now satisfactorily considers the adjacent LNCS within West Dunbartonshire and assesses the potential cross boundary impact upon ecology, biodiversity and protected species within West Dunbartonshire. It can therefore be concluded that significant adverse impacts should not occur within the West Dunbartonshire area. Whilst it is expected that the Scottish Ministers fully consider the appropriateness of the proposed planting and landscape mitigation within the site to ensure that it compliments the surrounding area, it is concluded that the proposal can now be considered acceptable with reference to Policies 3, 4 and 11(e)(ix) of NPF4.
- 4.9** In response to the concerns raised regarding the lack of any details relating to the decommissioning and restoration of the site, the applicant has set out that that is common practice for decommissioning of the site to be addressed by condition with detailed decommissioning information and a restoration bond to be agreed prior to the commencement of any works on site. Examples of other, similar development proposals which have consented by the Scottish Ministers within Renfrewshire are given and these take such an approach. A recently consented development in Inverclyde also takes the same approach. Whilst the preference remains for the approach to decommissioning and site restoration to be provided upfront with the detail and implementation of the de-commissioning and restoration scheme then addressed by condition, it is accepted that this is at odds with the established approach to other similar developments. It is therefore accepted that the decommissioning and site restoration can be secured by condition and any such condition(s) must be suitably robust to ensure the complete removal of all aspects of the development and the restoration of the landform within the site to its original profile. A further condition can also ensure early decommissioning should the site cease to export electricity to the grid for in excess of 12 months. A financial provision to provide sufficient funds for the decommissioning and restoration of the site should such be required must also be secured. With such an approach, it is considered the development meets the requirements Policy 11(e)(xi) of NPF4.

## **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

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**Planning, Building Standards and Environmental Health Manager**

**Date: 16<sup>th</sup> April 2025**

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**Appendix 1:** Council's further Consultation Response  
**Appendix 2:** Location Plan  
**Appendix 3:** Council's original response of 13<sup>th</sup> May 2024  
**Appendix 4:** Council's updated response of 13<sup>th</sup> December 2024  
**Appendix 5:** Applicant's covering letter  
**Appendix 6:** Applicant's additional supporting statement  
**Appendix 7:** Applicant's updated preliminary ecological appraisal

**Background Papers:**

1. Application documents
2. National Planning Framework 4
3. Adopted East Dunbartonshire Local Development Plan 2
4. Planning Committee Report dated 11<sup>th</sup> May 2024
5. Planning Committee Report dated 11<sup>th</sup> December 2024

**Wards affected:**

Adjacent to Ward 4 (Kilpatrick)