

Report To: The Planning Board

Date: 6th August 2025

Report By: Interim Director - Regeneration

Report No: 25/0033/IC

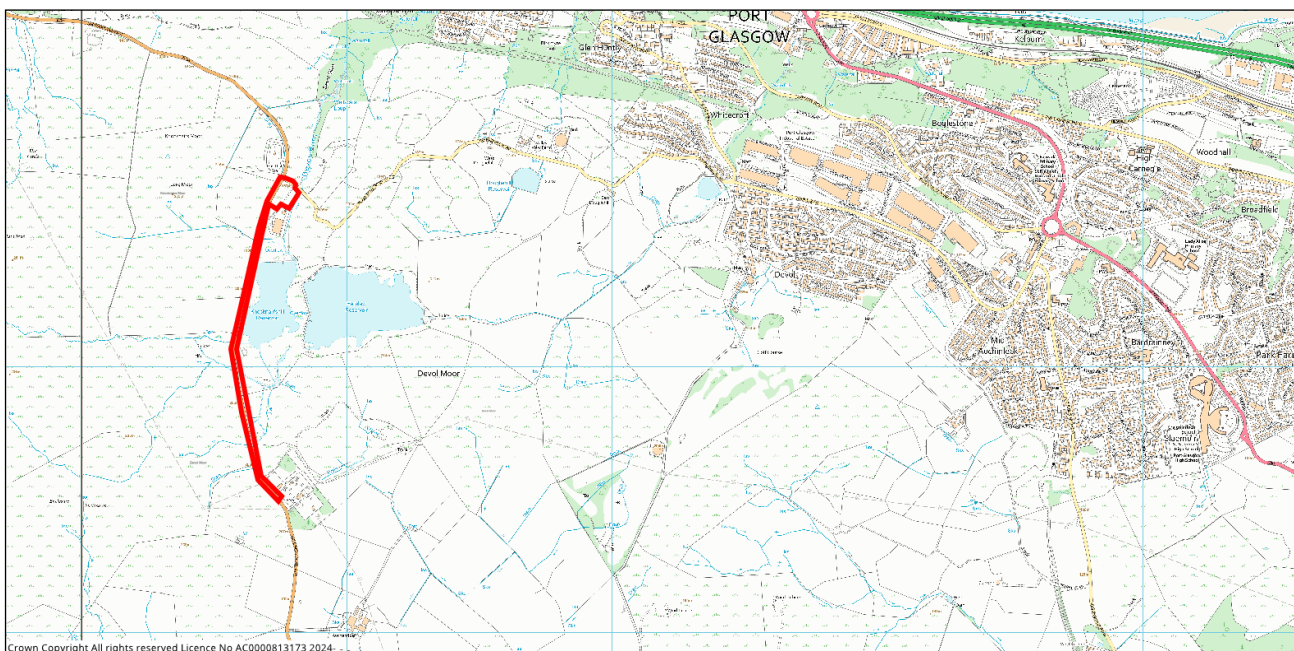
**Major Application
Development**

**Contact
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Subject: Construction and operation of Dougliedhill 49MW (AC) Battery Energy Storage System (BESS), associated infrastructure and miscellaneous works (Major) at

Land at Former Dougliedhill Water Treatment Works, Dougliedhill Road, Port Glasgow



SUMMARY

- The proposal complies with National Planning Framework 4 and the adopted 2019 and the proposed 2021 Inverclyde Local Development Plans.
- There have been no representations received in relation to this application.
- Consultation responses present no impediment to the development.
- The recommendation is to GRANT PLANNING PERMISSION subject to conditions.

Drawings may be viewed at:

<https://planning.inverclyde.gov.uk/Online/applicationDetails.do?activeTab=documents&keyVal=S0JZJIIMIC000>

SITE DESCRIPTION

The application site occupies part of the former Wastewater Treatment Works at Douglichill. The proposed development area (0.8ha) will reside within previous amenity, parking and storage areas associated with the former treatment works. Two now vacant buildings (south of the development area) will remain. The site is bordered by Douglichill Road (north), the B788 road (west) and Devol Burn (east). Access to the proposed site is via an existing internal access road from Douglichill Road which previously serviced the treatment works. The Harelaw and Knocknair's Hill Reservoirs are located further south. The proposed BESS development will connect to the Devol Moor electricity substation. The applicant has included the cable route along the B788 road (south) towards the substation as part of the site area (2.8ha in total inclusive of the cable route). The proposed site is 700m from the settlement boundary of Port Glasgow and is 'urban fringe' or semi-rural in nature. Nearby buildings include agricultural properties, boarding kennels and a gas distribution installation. Douglichill Road continues into Port Glasgow and is well used by through traffic, connecting the rural B788 to Port Glasgow.

PROPOSAL

The proposed development is a battery energy storage system (BESS). The development will provide grid stabilisation and battery energy storage. The development consists of a battery energy storage system which the applicant has advised will have a maximum generating capacity of 49.9MW. The applicant has indicated the intended lifetime of the proposal is 40 years, after which the facility will be decommissioned and the land restored to its former state.

The proposal comprises the following:

Containerised units

The site will contain 7 battery units (6 double and 1 single) with measurements of 7810mm x 1720mm x 2795mm, with 1 gable elevation housing a vent. Cabinet style doors and a control panel are located on a side elevation.

Distribution network operator (DNO) substation

A DNO brick-built substation (6191mm x 6705mm x 5069mm). The gable (side) elevations have single and twin personnel doors respectively. Front and rear elevations have a double vent and single personnel doors respectively. The housing has a pitched roof and will contain various panels, boards and charges in conjunction with a main switchboard and 33kv cable trench.

Operator control and switchroom

A 33kV control and switchroom (2216mm x 1803mm x 2167mm). The building is a combined control and switchgear room with a personnel door for access.

Other installations

Two auxiliary transformers (2216mm x 1803mm x 2167mm) are located within the operational area, a spare parts container, a welfare unit (6800mm x 4000mm x 3500mm), 2 fire hydrants and CCTV.

Drainage

An attenuation pond is proposed at the eastern boundary of the site. Details of site drainage/Sustainable Urban Drainage System (SUDS) have been provided. This includes an outline SUDS design drawing supported by a Flood Risk Assessment and Drainage Strategy.

Landscaping

The applicant proposes planting to the north, south, east and west within the site. The submission includes an outline Landscape and Ecological Mitigation and Enhancement Plan. The plan includes retention of existing trees, planting new native trees, shrub and hedgerow, native wildflower seeding, existing shrub improvements and a conservation appropriate colour finish for the boundary fence.

Access

Access to the site will be from Douglichill Road, via an existing internal access track running through the site. A short additional access track will be required to maintain the SUDS ponds and between battery packs 1 - 4 and 5 - 6. The applicant is utilising the existing access point previously used for the wastewater treatment facility.

Security and fencing

The 3m high palisade fence will encircle the western and eastern portions of the site (the access road intersects).

Connection to Devol Moor sub-station

The development is approximately 800m from the Devol Moor Sub-Station. Connection to the substation is included within the proposed site boundary.

Construction compound

A construction compound will be located to the west of the site. This area of land is also identified as the location of the SUDS pond. The construction compound will accommodate a temporary swale, a turning point for heavy vehicles and a general storage area.

Indicated construction period

The construction period is indicated as being approximately 6 months in duration.

Submitted reports

The planning application has been accompanied by a Landscape and Ecological Mitigation Plan (January 2025); Transport Statement (January 2025); Flood Risk Assessment (January 2025); Surface Water Management Assessment (January 2025); Battery Safety Management Plan (January 2025); Air Quality Assessment (January 2025); Design and Access Statement (January 2025); Landscape and Visual Appraisal (February 2025); Planning Statement (February 2025); Preliminary Ecological Appraisal (January 2025); Noise Impact Assessment (February 2025).

DEVELOPMENT PLAN POLICIES

National Planning Framework 4

NPF4 was adopted by the Scottish Ministers on 13th February 2023. NPF4 forms part of the statutory development plan, along with the Inverclyde Local Development Plan and its supplementary guidance. NPF4 supersedes National Planning Framework 3 (NPF3) and Scottish Planning Policy (SPP) (2014). NPF3 and SPP no longer represent Scottish Ministers' planning policy. The Clydeplan Strategic Development Plan and associated supplementary guidance cease to have effect from 13th February 2023 and as such no longer form part of the development plan.

The development draws support from NPF4 in principle. NPF4 states that - "As technologies continue to develop, storage and other forms of generation will grow" and also outlines general support for

storage technology and capacity. The document also details that the planning system should 'provide support' for energy storage.

There are six overarching spatial principles contained within NPF4. The most pertinent to renewable energy is 'just transition'. This principle is designed to ensure that the move to net zero is fair and inclusive.

NPF4 contains 33 policies, and the following are considered relevant to this application.

Policy 1 Tackling the climate and nature crisis

When considering all development proposals significant weight will be given to the global climate and nature crises.

Policy 2 Climate mitigation and adaptation

- a) Development proposals will be sited and designed to minimise lifecycle greenhouse gas emissions as far as possible.
- b) Development proposals will be sited and designed to adapt to current and future risks from climate change.
- c) Development proposals to retrofit measures to existing developments that reduce emissions or support adaptation to climate change will be supported

Policy 3 Biodiversity

- a) Development proposals will contribute to the enhancement of biodiversity, including where relevant, restoring degraded habitats and building and strengthening nature networks and the connections between them. Proposals should also integrate nature-based solutions, where possible.
- b) Development proposals for national or major development, or for development that requires an Environmental Impact Assessment will only be supported where it can be demonstrated that the proposal will conserve, restore and enhance biodiversity, including nature networks so they are in a demonstrably better state than without intervention. This will include future management. To inform this, best practice assessment methods should be used. Proposals within these categories will demonstrate how they have met all of the following criteria:
 - i. the proposal is based on an understanding of the existing characteristics of the site and its local, regional and national ecological context prior to development, including the presence of any irreplaceable habitats;
 - ii. wherever feasible, nature-based solutions have been integrated and made best use of;
 - iii. an assessment of potential negative effects which should be fully mitigated in line with the mitigation hierarchy prior to identifying enhancements;
 - iv. significant biodiversity enhancements are provided, in addition to any proposed mitigation. This should include nature networks, linking to and strengthening habitat connectivity within and beyond the development, secured within a reasonable timescale and with reasonable certainty. Management arrangements for their long term retention and monitoring should be included, wherever appropriate; and
 - v. local community benefits of the biodiversity and/or nature networks have been considered
- d) Any potential adverse impacts, including cumulative impacts, of development proposals on biodiversity, nature networks and the natural environment will be minimised through careful planning and design. This will take into account the need to reverse biodiversity loss, safeguard the ecosystem services that the natural environment provides, and build resilience by enhancing nature networks and maximising the potential for restoration.

Policy 4 Natural Places

f) Development proposals that are likely to have an adverse effect on species protected by legislation will only be supported where the proposal meets the relevant statutory tests. If there is reasonable evidence to suggest that a protected species is present on a site or may be affected by a proposed development, steps must be taken to establish its presence. The level of protection required by legislation must be factored into the planning and design of development, and potential impacts must be fully considered prior to the determination of any application.

Policy 8 Green Belt

a) Development proposals within a green belt designated within the LDP will only be supported if:

they are for:

- minerals operations and renewable energy developments and;

ii) the following requirements are met:

- reasons are provided as to why a green belt location is essential and why it cannot be located on an alternative site outwith the green belt;
- the purpose of the green belt at that location is not undermined;
- the proposal is compatible with the surrounding established countryside and landscape character;
- the proposal has been designed to ensure it is of an appropriate scale, massing and external appearance, and uses materials that minimise visual impact on the green belt as far as possible;
- there will be no significant long-term impacts on the environmental quality of the green belt.

Policy 11 Energy

a) Development proposals for all forms of renewable, low-carbon and zero emissions technologies will be supported. Relevant policy strands to this proposal include;

- ii. enabling works, such as grid transmission and distribution infrastructure;
- iii. energy storage, such as battery storage and pumped storage hydro;

c) Development proposals will only be supported where they maximise net economic impact, including local and community socio-economic benefits such as employment, associated business and supply chain opportunities.

e) In addition, project design and mitigation will demonstrate how the following impacts are addressed:

- i. impacts on communities and individual dwellings, including, residential amenity, visual impact, noise and shadow flicker;
- ii. significant landscape and visual impacts, recognising that such impacts are to be expected for some forms of renewable energy. Where impacts are localised and/ or appropriate design mitigation has been applied, they will generally be considered to be acceptable;
- iii. public access, including impact on long distance walking and cycling routes and scenic routes;
- iv. impacts on aviation and defence interests including seismological recording;
- v. impacts on telecommunications and broadcasting installations, particularly ensuring that transmission links are not compromised;

- vi. impacts on road traffic and on adjacent trunk roads, including during construction;
- vii. impacts on historic environment;
- viii. effects on hydrology, the water environment and flood risk;
- ix. biodiversity including impacts on birds;
- x. impacts on trees, woods and forests;
- xi. proposals for the decommissioning of developments, including ancillary infrastructure, and site restoration;
- xii. the quality of site restoration plans including the measures in place to safeguard or guarantee availability of finances to effectively implement those plans; and
- xiii. cumulative impacts.
 - In considering these impacts, significant weight will be placed on the contribution of the proposal to renewable energy generation targets and on greenhouse gas emissions reduction targets.
 - Grid capacity should not constrain renewable energy development. It is for developers to agree connections to the grid with the relevant network operator. In the case of proposals for grid infrastructure, consideration should be given to underground connections where possible.

Policy 14 Design, quality and place

- a) Development proposals will be designed to improve the quality of an area whether in urban or rural locations and regardless of scale.
- b) Development proposals will be supported where they are consistent with the six qualities of successful places:

Healthy: Supporting the prioritisation of women's safety and improving physical and mental health.

Pleasant: Supporting attractive natural and built spaces.

Connected: Supporting well connected networks that make moving around easy and reduce car dependency

Distinctive: Supporting attention to detail of local architectural styles and natural landscapes to be interpreted, literally or creatively, into designs to reinforce identity.

Sustainable: Supporting the efficient use of resources that will allow people to live, play, work and stay in their area, ensuring climate resilience, and integrating nature positive, biodiversity solutions.

Adaptable: Supporting commitment to investing in the long-term value of buildings, streets and spaces by allowing for flexibility so that they can be changed quickly to accommodate different uses as well as maintained over time.

Further details on delivering the six qualities of successful places are set out in Annex D.

Policy 22 Flood risk and water management

- c) Development proposals will:

- i. not increase the risk of surface water flooding to others, or itself be at risk.
- ii. manage all rain and surface water through sustainable urban drainage systems (SUDS), which should form part of and integrate with proposed and existing blue and green infrastructure. All proposals should presume no surface water connection to the combined sewer;
- iii. seek to minimise the area of impermeable surface.

Policy 23 Health and Safety

d) Development proposals that are likely to have significant adverse effects on air quality will not be supported. Development proposals will consider opportunities to improve air quality and reduce exposure to poor air quality. An air quality assessment may be required where the nature of the proposal or the air quality in the location suggest significant effects are likely.

e) Development proposals that are likely to raise unacceptable noise issues will not be supported. The agent of change principle applies to noise sensitive development. A Noise Impact Assessment may be required where the nature of the proposal or its location suggests that significant effects are likely.

Policy 29 Rural Development

a) Development proposals that contribute to the viability, sustainability and diversity of rural communities and local rural economy will be supported, including:

- i. farms, crofts, woodland crofts or other land use businesses, where use of good quality land for development is minimised and business viability is not adversely affected;
- ii. diversification of existing businesses;
- iii. production and processing facilities for local produce and materials, for example sawmills, or local food production;
- iv. essential community services;
- v. essential infrastructure;
- vi. reuse of a redundant or unused building;
- vii. appropriate use of a historic environment asset or is appropriate enabling development to secure the future of historic environment assets;
- viii. reuse of brownfield land where a return to a natural state has not or will not happen without intervention;
- ix. small scale developments that support new ways of working such as remote working, homeworking and community hubs; or
- x. improvement or restoration of the natural environment.

b) Development proposals in rural areas should be suitably scaled, sited and designed to be in keeping with the character of the area. They should also consider how the development will contribute towards local living and take into account the transport needs of the development as appropriate for the rural location.

Adopted 2019 Local Development Plan Policies

Policy 1 - Creating Successful Places

Inverclyde Council requires all development to have regard to the six qualities of successful places. In preparing and assessing development proposals, consideration must be given to the factors set out in Figure 3 and demonstrated in a design-led approach. Where relevant, applications will also be assessed against the Planning Application Advice Notes Supplementary Guidance.

Policy 4 - Supplying Energy

Proposals for infrastructure for the generation, storage or distribution of heat and electricity will be supported in principle where they contribute to a reduction in greenhouse gas production. Proposals will be assessed with regard to impact, including cumulative impact on:

- a) the resources protected by the Plan's historic buildings and places and natural and open spaces chapters;
- b) the amenity and operations of existing and adjacent uses;
- c) tourism and recreational resources;
- d) air quality;
- e) aviation and defence interests;
- f) telecommunication and broadcasting interests; and
- g) traffic and pedestrian safety

Where relevant, proposals are to be accompanied with restoration plans acceptable to the Council. Relevant proposals are required to accord with the Council's Supplementary Guidance on Energy.

Policy 8 - Managing Flood Risk

Development proposals will be assessed against the Flood Risk Framework set out in Scottish Planning Policy. Proposals must demonstrate that they will not:

- a) be at significant risk of flooding (i.e. within the 1 in 200 year design envelope);
- b) increase the level of flood risk elsewhere; and
- c) reduce the water conveyance and storage capacity of a functional flood plain.

The Council will support, in principle, the flood protection schemes set out in the Clyde and Loch Lomond Local Flood Risk Management Plan 2016, subject to assessment of the impacts on the amenity and operations of existing and adjacent uses, the green network, historic buildings and places, and the transport network.

Policy 9 - Surface and Waste Water Drainage

New build development proposals which require surface water to be drained should demonstrate that this will be achieved during construction and once completed through a Sustainable Drainage System (SuDS), unless the proposal is for a single dwelling or the discharge is directly to coastal waters.

The provision of SuDS should be compliant with the principles set out in the SuDS Manual C753 and Sewers for Scotland 3rd edition, or any successor documents.

Where waste water drainage is required, it must be demonstrated that the development can connect to the existing public sewerage system. Where a public connection is not feasible at present, a temporary waste water drainage system can be supported if:

- i) a public connection will be available in future, either through committed sewerage infrastructure or pro-rata developer contributions; and
- ii) the design of, and maintenance arrangements for, the temporary system meet the requirements of SEPA, Scottish Water and Inverclyde Council, as appropriate.

Private sustainable sewerage systems within the countryside can be supported if it is demonstrated that they pose no amenity, health or environmental risks, either individually or cumulatively.

Developments including SuDS are required to have an acceptable maintenance plan in place.

Policy 10 - Promoting Sustainable and Active Travel

Development proposals, proportionate to their scale and proposed use, are required to:

a) provide safe and convenient opportunities for walking and cycling access within the site and, where practicable, include links to the wider walking and cycling network; and

b) include electric vehicle charging infrastructure, having regard to the Energy Supplementary Guidance.

Proposals for development, which the Council considers will generate significant travel demand, are required to be accompanied by a travel plan demonstrating how travel to and from the site by means other than private car will be achieved and encouraged. Such development should also demonstrate that it can be accessed by public transport.

The Council will support the implementation of transport and active travel schemes as set out in Council-approved strategies, subject to adequate mitigation of the impact of the scheme on: development opportunities; the amenity and operations of existing and adjacent uses; the green network; and historic buildings and places.

Policy 11 - Managing Impact of Development on the Transport Network

Development proposals should not have an adverse impact on the efficient operation of the transport and active travel network. Development should comply with the Council's roads development guidelines and parking standards. Developers are required to provide or contribute to improvements to the transport network that are necessary as a result of the proposed development.

Policy 12 - Air Quality

Development that could have a detrimental impact on air quality or would introduce a sensitive receptor to an area with poor air quality will be required to be accompanied by an Air Quality Assessment, which identifies the likely impacts and sets out how these will be mitigated to an acceptable level.

Policy 14 - Green Belt and Countryside

Development in the Green Belt and Countryside will only be permitted if it is appropriately designed, located, and landscaped, and is associated with:

- a) agriculture, horticulture, woodland or forestry;
- b) a tourism or recreational use that requires a countryside location;
- c) infrastructure with a specific locational need;
- d) the appropriate re-use of a redundant stone or brick building, the retention of which is desirable for its historic interest or architectural character, subject to that interest or character being retained; or
- e) intensification (including extensions and outbuildings) of an existing use, which is within the curtilage of the associated use and is of an appropriate scale and form.

Proposals associated with the uses set out in criteria a)-c) must provide justification as to why the development is required at the proposed location.

Policy 33 - Biodiversity and Geodiversity Natura 2000 sites

Development proposals that are likely to have a significant effect on a Natura 2000 site will be subject to an appropriate assessment of the implications of the proposal on conservation objectives.

Proposals will only be permitted if the assessment demonstrates that there will be no adverse effect on the integrity of the site or if:

- a) there are no alternative solutions; and
- b) there are imperative reasons of overriding public interest, including those of a social or economic nature; and
- c) compensatory measures are provided to ensure that the overall coherence of the Natura network is protected.

In such cases, the Scottish Ministers must be notified.

Sites of Special Scientific Interest

Development affecting Sites of Special Scientific Interest will only be permitted where the objectives of the designation and the overall integrity of the area will not be compromised, or if any significant adverse effects on the qualities for which the area has been designated are clearly outweighed by social, environmental or economic benefits of national importance.

Protected Species

When proposing any development which may affect a protect species, the applicant should fulfil the following requirements: to establish whether a protected species is present; to identify how the protected species may be affected by the development; to ensure that the development is planned and designed so as to avoid or minimise any such impact, while having regard to the degree of protection which is afforded by legislation, including any separate licensing requirements; and to demonstrate that it is likely that any necessary licence would be granted.

Local Nature Conservation Sites

Development is required to avoid having a significant adverse impact on Local Nature Conservation Sites. Any adverse impacts are to be minimised. Where adverse impacts are unavoidable, compensatory measures will be required.

Local Landscape Area

Development that affects the West Renfrew Hills Local Landscape Area is required to protect and, where possible, enhance its special features as set out in the Statement of Importance. Where there is potential for development to result in a significant adverse landscape and/or visual impact, proposals should be informed by a landscape and visual impact assessment.

Non-designated sites

The siting and design of development should take account of local landscape character. All development should seek to minimise adverse impact on wildlife, especially species and habitats identified in the Local Biodiversity Action Plan. Development should take account of connectivity between habitat areas. Where possible, new development should be designed to conserve and enhance biodiversity.

Policy 37 - Clyde Muirshiel Regional Park

Proposals for development within Clyde Muirshiel Regional Park will be considered with regard to the Park Objectives and Strategy.

Policy 39 - Water Environment

Development proposals affecting the water environment will be required to safeguard and improve water quality and the enjoyment of the water environment by:

- a) supporting the strategies and actions of the national and regional marine plans, and supporting the objectives and actions of the River Basin Management Plan for Scotland and the Clyde Area Management Plan, where applicable;
- b) minimising adverse impacts on, or improving, water quality, flow rate, morphology, riparian habitat and groundwater dependent terrestrial ecosystems;
- c) the removal of existing culverts. This will be a requirement on development sites, unless it can be clearly demonstrated as not practical or resulting in the development not being viable;
- d) avoiding the hard engineering and culverting of waterways and the building over of existing culverts in new developments unless clearly demonstrated to be essential. Where culverts are required, they should be designed to maintain existing flow conditions and aquatic life, with long term maintenance arrangements; maintaining or improving waterside and water-based habitats; and
- e) providing appropriately sized buffer strips between development and watercourses, in line with SEPA guidance, and providing access to the water and waterside, where appropriate.

Proposed 2021 Inverclyde Local Development Plan Policies

Policy 1 - Creating Successful Places

Inverclyde Council requires all development to have regard to the six qualities of successful places. In preparing and assessing development proposals, consideration must be given to the factors set out in Figure 3 and demonstrated in a design-led approach. Where relevant, applications will also be assessed against the Planning Application Advice Notes and Design Guidance for New Residential Development Supplementary Guidance. When assessing proposals for the development opportunities identified by this Plan, regard will also be had to the mitigation and enhancement measures set out in the Strategic Environmental Assessment Environmental Report.

Policy 4 - Supplying Energy

Proposals for infrastructure for the generation, storage or distribution of heat and electricity will be supported in principle where they contribute to a reduction in greenhouse gas production. Proposals will be assessed with regard to impact, including cumulative impact on:

- a) the resources protected by the Plan's historic buildings and places and natural and open spaces chapters;
- b) the amenity and operations of existing and adjacent uses;
- c) tourism and recreational resources;
- d) air quality;
- e) aviation and defence interests;
- f) telecommunication and broadcasting interests; and
- g) traffic and pedestrian safety

Where relevant, proposals are to be accompanied with restoration plans acceptable to the Council. Relevant proposals are required to accord with the Council's Supplementary Guidance on Energy.

Policy 9 - Managing Flood Risk

Development proposals will be assessed against the Flood Risk Framework set out in Scottish Planning Policy. Proposals must demonstrate that they will not:

- a) be at significant risk of flooding (i.e. within the 1 in 200 year design envelope);
- b) increase the level of flood risk elsewhere; and
- c) reduce the water conveyance and storage capacity of a functional flood plain.

The Council will support, in principle, the flood risk management schemes set out in the Clyde and Loch Lomond Local Flood Risk Management Plan 2016, subject to assessment of the impacts on the amenity and operations of existing and adjacent uses, the resources protected by the Plans historic buildings and places and natural and open spaces chapters, and the transport network. Where practical and effective, nature-based solutions to flood management will be preferred.

Policy 10 - Surface and Waste Water Drainage

New build development proposals which require surface water to be drained should demonstrate that this will be achieved during construction and once completed through a Sustainable Drainage System (SuDS), unless the proposal is for a single dwelling or the discharge is directly to coastal waters.

The provision of SuDS should be compliant with the principles set out in the SuDS Manual C753 and Sewers for Scotland 4th edition, or any successor documents.

Where waste water drainage is required, it must be demonstrated that the development can connect to the existing public sewerage system. Where a public connection is not feasible at present, a temporary waste water drainage system can be supported if:

- a) a public connection will be available in future, either through committed sewerage infrastructure or pro-rata developer contributions; and
- b) the design of, and maintenance arrangements for, the temporary system meet the requirements of SEPA, Scottish Water and Inverclyde Council, as appropriate.

Private sustainable sewerage systems within the countryside can be supported if it is demonstrated that they pose no amenity, health or environmental risks, either individually or cumulatively.

Developments including SuDS are required to have an acceptable maintenance plan in place, which identifies who will be responsible for maintenance and how this will be funded in the long term.

Policy 11 - Promoting Sustainable and Active Travel

Development proposals, proportionate to their scale and proposed use, are required to:

- a) provide safe and convenient opportunities for walking and cycling access within the site and, where practicable, including links to the wider walking, cycling network and public transport network; and
- b) include electric vehicle charging infrastructure, having regard to the Energy Supplementary Guidance.

Proposals for development, which the Council considers will generate significant travel demand, are required to be accompanied by a travel plan demonstrating how travel to and from the site by means other than private car will be achieved and encouraged. Such development should also demonstrate that it can be accessed by public transport.

The Council will support the implementation of transport and active travel schemes as set out in national, regional and Council-approved strategies, subject to adequate mitigation of the impact of the scheme on: development opportunities; the amenity and operations of existing and adjacent uses; and the resources protected by the Plan's historic buildings and places and natural and open spaces chapters.

Policy 12 - Managing Impact of Development on the Transport Network

Development proposals should not have an adverse impact on the efficient operation of the transport and active travel network. Development should comply with the Council's roads development guidelines and parking standards, including cycle parking standards. Developers are required to

provide or financially contribute to improvements to the transport network that are necessary as a result of the proposed development.

Policy 13 - Air Quality

Development that could have a detrimental impact on air quality or would introduce a sensitive receptor to an area with poor air quality will be required to be accompanied by an Air Quality Assessment, which identifies the likely impacts and sets out how these will be mitigated to an acceptable level.

Policy 15 - Green Belt and Countryside

Development in the Green Belt and Countryside will only be permitted if it is appropriately designed, located, and landscaped, and is associated with:

- a) agriculture, horticulture, woodland or forestry;
- b) a tourism or recreational use that requires a countryside location;
- c) infrastructure with a specific locational need;
- d) the appropriate re-use of a redundant stone or brick building, the retention of which is desirable for its historic interest or architectural character, subject to that interest or character being retained; or
- e) intensification (including extensions and outbuildings) within the curtilage of an existing use, which is of an appropriate scale and form.

Proposals associated with the uses set out in criteria a)-c) must provide justification as to why the development is required at the proposed location. Proposals in the green belt must not undermine the objectives of the green belt as set out in Scottish Planning Policy and the Clydeplan Strategic Development Plan. Non-conforming uses will only be considered favourably in exceptional or mitigating circumstances.

Policy 33 - Biodiversity and Geodiversity European sites

Development proposals that are likely to have a significant effect on a European site which are not directly connected with or necessary to their conservation management must be subject to an appropriate assessment of the implications of the proposal on conservation objectives. Proposals will only be permitted if the assessment demonstrates that there will be no adverse effect on the integrity of the site either during construction or operation of the development, or if:

- a) there are no alternative solutions; and
- b) there are imperative reasons of overriding public interest, including those of a social or economic nature; and
- c) compensatory measures are provided to ensure that the overall coherence of the network is protected.

In such cases, the Scottish Ministers must be notified.

Sites of Special Scientific Interest

Development affecting Sites of Special Scientific Interest will only be permitted where the objectives of the designation and the overall integrity of the area will not be compromised, or if any significant adverse effects on the qualities for which the area has been designated are clearly outweighed by social, environmental or economic benefits of national importance.

Protected Species

When proposing any development which may affect a protected species, the applicant should fulfil the following requirements: to establish whether a protected species is present; to identify how the

protected species may be affected by the development; to ensure that the development is planned and designed so as to avoid or minimise any such impact, while having regard to the degree of protection which is afforded by legislation, including any separate licensing requirements; and to demonstrate that it is likely that any necessary licence would be granted.

Local Nature Conservation Sites

Development is required to avoid having a significant adverse impact on Local Nature Conservation Sites. Any adverse impacts are to be minimised. Where adverse impacts are unavoidable, adequate compensatory measures will be required.

Non-designated sites

All development should seek to minimise adverse impact on wildlife, especially species and habitats identified in the Local Biodiversity Action Plan. Development should take account of connectivity between habitat areas. Where possible, new development should be designed to conserve and enhance biodiversity.

Policy 34 - Landscape

The siting and design of development should take account of local landscape character and setting in order to conserve, enhance and/or restore landscape character and distinctiveness. Development should aim to conserve those features that contribute to local distinctiveness including:

- a) the setting of buildings and settlements within the landscape
- b) the pattern of woodlands, fields, hedgerows and trees; especially where they define/ create a positive settlement/ urban edge
- c) the character and distinct qualities of river corridors
- d) historic landscapes
- e) topographic features, including important/prominent views, vistas and panoramas

When assessing development proposals likely to have a significant impact on the landscape, the guidance contained in the Glasgow and Clyde Valley Landscape Character Assessment will be taken into account.

Development that affects the West Renfrew Hills Local Landscape Area is required to protect and, where possible, enhance its special landscape qualities as set out in the Statement of Importance. Where there is potential for development to result in a significant adverse landscape and/or visual impact, proposals should be amended to avoid or mitigate these impacts through being informed by a landscape and visual impact assessment.

Policy 36 - Safeguarding Green Infrastructure

Proposals for new or enhanced open spaces, which are appropriate in terms of location, design and accessibility, will be supported.

Development proposals that will result in the loss of open space which is, or has the potential to be, of quality and value, will not be permitted, unless provision of an open space of equal or enhanced quality and value is provided within the development or its vicinity.

Outdoor sports facilities will be safeguarded from development except where:

- a) the proposed development is ancillary to the principal use of the site as an outdoor sports facility, or involves only a minor part of the facility and would not affect its use for sport and training;
- b) the facility to be lost is to be replaced by a new or upgraded facility of comparable or better quality, which is convenient for the users of the original facility and maintains or improves overall playing capacity in the area; or

c) a relevant strategy demonstrates a clear excess of provision to meet current and anticipated demand, and the development would not result in a reduction in the overall quality of provision.

Development that would result in the loss of a core path, right of way or other important outdoor access route will not be permitted unless acceptable alternative provision can be made.

Policy 38 - Clyde Muirshiel Regional Park

Proposals for development within Clyde Muirshiel Regional Park will be considered with regard to the Park Objectives and Strategy and to the Park's statutory purpose of providing recreational access to the countryside.

Policy 39 - Water Environment

Development proposals affecting the water environment will be required to safeguard and improve water quality and the enjoyment of the water environment by:

a) supporting the strategies and actions of the national and regional marine plans, and supporting the objectives and actions of the River Basin Management Plan for Scotland and the Clyde Area Management Plan, where applicable;

b) minimising adverse impacts on, or improving, water quality, flow rate, morphology, riparian habitat and groundwater dependent terrestrial ecosystems;

c) the removal of existing culverts. This will be a requirement on development sites, unless it can be clearly demonstrated as not practical or resulting in the development not being viable;

d) avoiding the hard engineering and culverting of waterways and the building over of existing culverts in new developments unless clearly demonstrated to be essential. Where culverts are required, they should be designed to maintain existing flow conditions and aquatic life, with long term maintenance arrangements; maintaining or improving waterside and water-based habitats; and

e) providing appropriately sized buffer strips between development and watercourses, in line with SEPA guidance, and providing access to the water and waterside, where appropriate.

CONSULTATIONS

Head of Service - Roads and Transportation – advises the following:

- The use class (BESS) is sui generis, and the applicant should demonstrate that the provision of three parking spaces for maintenance vehicles is sufficient for the expected numbers of staff.
- Parking bays are to be 2.5m x 5.0m with a 6.0m aisle.
- An adequate visibility splay is annotated.
- Access width should be 4.8m for the first 20m to allow egress from the site.
- Access should be fully paved for 20m and the gradient a maximum of 10%.
- HGV movements should be restricted around school times for public safety. Hours and bridge height restrictions should be included in a Traffic Management Plan.
- Section 56 required for works affecting the public road network.

- FRA/SWMA are acceptable and independently verified.
- A lighting drawing should be provided to determine if there is any dazzle effect.

Scottish Environmental Protection Agency - states no objection however has highlighted the presence of the Devol Burn, and the risk of flooding resultant from the burn. SEPA have confirmed that the general approach in compiling the FRA is acceptable. The applicant has also identified a blocked culvert and has correctly included a worst-case scenario (full capacity) for both nearby reservoirs. SEPA mapping does not normally include information on smaller watercourses such as the Devol Burn.

SEPA have confirmed that BESS can be categorised as essential infrastructure and merits an exemption under Policy 22 (Flood Risk) of NPF4. BESS may be located in an area of flood risk providing that no land raising or loss of floodplain is proposed. An application under the Water Environment (CARS) regulations may be required for surface water run-off that may occur during construction and operation of the BESS. Fire prevention guidance is detailed within the Fire Chief's Planning Practice Guidance. Water pollution incidents will require SEPA investigation.

Public Protection Manager - advises that should the application receive consent, a private water supply management plan should be provided via condition to safeguard and maintain satisfactory private water supplies. In the event of an impact on air quality, a Monitoring Protocol should be established and a Pollution Mitigation Plan provided for the approval of the Public Protection Manager.

There is a possibility of unrecorded contamination being present within the site and if encountered further assessment and remedial action may be required. This advice also applies to Japanese Knotweed.

The operational noise rating level should not exceed 5dB(A) above background noise levels as calculated at residential noise sensitive receptors. The site should only operate with an acoustic fence/barrier in place.

All external lighting on the application site should comply with the Scottish Government Guidance Note "Controlling Light Pollution and Reducing Lighting Energy Consumption".

Transport Scotland - do not object to the proposal.

Archaeology Advisor - advises that there is some likelihood of buried archaeological remains, particularly to the eastern periphery of the site. A degree of soil stripping in other areas may have removed or compromised other archaeological assets. Given the potential for some deposits to remain, a Method Statement and an Archaeological Watching Brief should be provided via a condition on any subsequent consent.

Historic Environment Scotland (HES) - advise that the development has some potential to affect Lurg Moor Roman Fortlet, Roman Road and hut circle (SM1653 and SM12800). HES have stated a position of no comment on the proposal. The application should be determined in accordance with national and local policy.

Scottish Water - do not object to the proposal however cannot guarantee that the site can be serviced. Water capacity is available at the Greenock Water Treatment Works. No waste water capacity is available. Connection to the water supply will require a formal application. Should any conflicts with Scottish Water live infrastructure be identified, this must be communicated at the earliest opportunity. Surface water connections to the combined sewer will not normally be accepted. Specific advice is offered by industry sectors such as food or other users that may produce trade discharges.

NatureScot - do not intend to offer any formal comment as the proposal does not meet their criteria for consultation.

Port Glasgow West Community Council - object to the proposal based on fire risk from lithium batteries, including the release of toxic chemicals after combustion. The community council are also concerned that prevailing winds may extend the areas affected by fire to a wide range of localities. The community council is also concerned about the long-term health impacts from a fire and the likely response of the fire service (to allow burn out).

PUBLICITY

The application was advertised in the Greenock Telegraph on 5th of April 2024 as there are no premises on neighbouring land.

SITE NOTICES

This type of application does not require a site notice.

PUBLIC PARTICIPATION

The application was the subject of neighbour notification. One representation was received (neutral). The representation queried the description in some parts of the submission of the B788 as "Auchmountain Road".

ASSESSMENT

This is a Major Development as defined by the Town and Country Planning (Hierarchy of Developments) (Scotland) Regulations 2009 as the proposal exceeds 20MW and does not exceed 50MW.

National Policy and Principle of the Development

National Planning Framework 4 (NPF4) sets out Scottish Ministers policies and proposals for the development and use of land. It plays a key role in supporting the delivery of Scotland's outcomes and the United Nations Sustainable Development Goals. Part 1 of NPF4 sets out a Spatial Strategy for Scotland until 2045 and identifies developments of national importance to help deliver that strategy. The need for Strategic Renewable Electricity Generation and Transmission Infrastructure is established therein. The generation of electricity from batteries is not in itself a renewable source of energy and the generation of electricity from the batteries will not contribute to national targets for production of electricity from renewable energy. However, the proposed development can be considered in general terms to be essential infrastructure through the provision of energy storage that adds flexibility and resilience to maintain and secure reliable supplies of energy.

Part 2 of NPF4 sets out National Planning Policy. NPF4 should be read as a whole, and the weight given to policies therein decided on a case-by-case basis. The greatest weight in consideration of the development in the context of NPF4 is Policy 11 on Energy. The Policy establishes an intent to encourage, promote and facilitate all forms of renewable energy development onshore and offshore. The description in the Policy includes energy generation, storage, and new and replacement transmission and distribution infrastructure. Storage is part of the infrastructure necessary to support the continued expansion of renewable energy developments necessary for decarbonising electricity supply. Battery storage can capture excess electricity produced by renewables when supply outstrips demand and release stored energy as electricity when renewable output is slow, helping balance the system and avoid curtailing renewable generation. Battery storage can therefore be considered consistent with the policy principles of national policy for tackling the climate and nature crises.

The energy policy sets out the matters that are to be addressed in the design and mitigation of a development including: impacts on communities and individual dwellings; significant landscape and visual impacts; public access; impacts on aviation and defense interests including seismological recording; impacts on telecommunications and broadcasting installations, particularly ensuring that transmission links are not compromised; impacts on road traffic and on adjacent trunk roads, including during construction; impacts on historic environment; effects on hydrology, the water environment and flood risk; biodiversity including impacts on birds; impacts on trees, woods and forests; proposals for the decommissioning of developments, including ancillary infrastructure, and site restoration; the quality of site restoration plans including the measures in place to safeguard or guarantee availability of finances to effectively implement those plans; and cumulative impacts.

Policy 11 c) states that development proposals will only be supported where they maximise net economic impact, including local and community socio-economic benefits such as employment, associated business and supply chain opportunities. The direct economic impacts of the development are difficult to quantify, although these are likely to result from the construction of the development and supply chain opportunities involved. The main benefit of the proposal is that it is part of the infrastructure needed to support the continued expansion of renewable energy developments necessary for decarbonising electricity supply. No specific quantitative analysis is provided, though negative economic impacts are not anticipated. The proposal is therefore consistent with the terms of Policy 11 c) of NPF4.

The proposed development is designed to support the flexible operation of the National Grid and decarbonisation of electricity supply. It is considered in general terms to directly contribute to achieving CO₂ emissions reduction targets, whilst diversifying the energy mix. NPF4 supports renewable energy developments under Policy 11, which in turn supports the general terms of Policy 1 to address the global climate and nature crises. The proposal therefore accords with the general terms of Policies 1 and 11 of NPF4.

Location of the Development

The key policies of both the adopted and proposed Local Development Plans in relation to the proposed development are Policy 4, in respect of supplying energy, as well as Policy 14 of the adopted Local Development Plan and Policy 15 of the proposed Local Development Plan as the site is in the Green Belt.

It has been indicated that battery storage facilities require to be located within proximity of a viable grid connection that has sufficient capacity to import and export power that will be stored and released into the grid at times of peak demand. Suitable points of connection include a sub-station or an overhead power line. When a suitable connection can be found, other factors need to be taken into consideration that impact on the viability and feasibility of a battery storage facility, particularly the distance from a sub-station. A battery storage facility could potentially be developed up to 2km from the point of the connection. However, the level of efficiency reduces the further away from the connection the facility is located.

Policy 1 of the adopted and proposed LDPs require all development to have regard to the six qualities of successful places. The relevant factors in this instance are being “Resource Efficient”, by using previously developed land for the effective management of renewable energy and “Safe and Pleasant”, by avoiding conflict between adjacent uses and by having regard to adverse amenity impacts.

Policy 4 indicates that proposals for infrastructure for the generation, storage or distribution of heat and electricity will be supported in principle where they contribute to a reduction in greenhouse gas production. Proposals will be assessed with regard to impacts on the green network (including landscape) and historic buildings and places; the amenity and operations of existing and adjacent uses; tourism and recreational resources; air quality; aviation and defense interests; telecommunication and broadcasting interests; and traffic and pedestrian safety.



View across to the site from close to the junction of the access point and Douglichill Road

The proposed development is designed to support the flexible operation of the National Grid and decarbonisation of electricity supply. It is considered in general terms to directly contribute to achieving CO₂ emissions reduction targets, whilst diversifying the energy mix. The assessment also concludes that adjacent uses are not adversely impacted by the development. Amenity impacts are proportionate to the development type and scale and are not considered unacceptable. The imposition of conditions would also mitigate against any effects considered unavoidable. No aviation, defence or telecommunication issues are considered likely as a result of the development. Matters related to traffic safety are discussed elsewhere within this assessment. There are no demonstrable impacts on historic or natural assets.

It is not considered that the proposed development would unacceptably impact tourism and recreation. The Right of Way 300m north of the site (Devol Glen, 12) may have a view of the proposed development however it would be terrain shielded to some degree, due to the woodland around Devol Glen.

No tourism assets are impacted to any notable degree due to both separation distance and the relatively modest scale of the development. Core paths are located 1.8km south of the site (29d), 1.5km southwest (32c) and 0.7km north (57b). It is broadly agreed with the applicant LVIA, that landform and terrain shields core paths from significant and persistent views. Informal recreational routes are also evident in the wider area, such as around the reservoir systems on the upland plateau and the operational Inverclyde Wind Farm.

Inverclyde Council Supplementary Guidance on Energy does not offer specific guidance on development of this type. The Guidance states that renewable energy developments should be removed at the end of their operational life. This advice is primarily directed towards turbine

development; however, some weight could be placed on installations such as this that provide supporting infrastructure and energy capacity management.

Therefore, the proposal complies in general terms with Policy 4 of both the adopted and proposed Local Development Plans.

In terms of the location, the site is within the Green Belt and needs to be considered under Policy 8 of NPF4 and Policy 14 of the adopted Local Development Plan as well as Policy 15 of the proposed Local Development Plan. In combination these policies support renewable energy developments in the Green Belt and support infrastructure with a specific locational need, where it is appropriately designed and located. The development has a specific locational need (proximity to a substation) and would therefore comply with Policy 8 of NPF4 (Green Belt) in respect of providing a justification for a development within the green belt. The purpose of the development is to provide supporting infrastructure for renewable development. It has been assessed that the proposal is largely compatible with the surrounding area and landscape character, minimises the visual impact and does not undermine the long-term quality of the green belt. It is considered that the development is moderate in scale and is not an imposing or overbearing feature in the context of the surrounding landscape. The proposal also lacks vertical scale and is commensurate with other elements of the built and natural environment. The proposed development is therefore compliant with Policy 8 of NPF4.

Landscape and Visual Impact

A Landscape and Visual Assessment (LVA) has been submitted with the application relating to the potential landscape and visual implications of the proposed development.

The LVA has allowed for a 2km study area to assess the impact of the development on both the landscape and visual amenity. The LVA appraisal includes the following viewpoints:

- Viewpoint 1: View from Kilmacolm Road (B788)
- Viewpoint 2: View from Harelaw Reservoir
- Viewpoint 3: Inverclyde Wind Farm car park

Regarding visual impacts on individual dwellings and communities, the applicant has provided an assessment of visual and landscape impacts, including viewpoints. Residential properties are considered sensitive to visual impacts, both from inside the property and areas of usable garden space and road approaches to dwellinghouses.



View from the site access along Dougliehill Road

Viewpoint 1

This viewpoint is located at Kilmacolm Road (B788) as experienced when approaching from the north. The visual impact is short in duration for road users and only constitutes a minor proportion of the road, therefore minimising impacts for users. Furthermore, the existing hedgerow and planting proposed will provide relief from views of the development. This will be particularly effective in the medium to long term when the planting matures. The viewpoint is under 0.1km from the site.

Viewpoint 2

This viewpoint is located at Harelaw Reservoir (southeast) and is representative of casual recreational users. The viewpoint is 0.25km from the site.

Viewpoint 3

This viewpoint is the Inverclyde Wind Farm car park (1.1km from the site). Recreational walking and cycling are popular around the wind farm and Corlich.

In considering the visual impact, the site has some existing screening with varying depths of hedgerow and the presence of embankments. The existing wastewater facility buildings screen some southerly views. The maximum height of structures within the proposed development is 5.57m and this is not considered to be excessive. Mitigation suggested by the applicant includes retaining planting where achievable, and further planting to provide additional screening to ensure a continuation and enhancement of the existing screening.

Although the development would constitute a change in the landscape, the effects are localised. It is considered that the effect on the landscape as a result of the development is minor to moderate. The proposed development is not of significant scale to result in a wider change in the landscape that would be experienced across the whole Landscape Character Area. Landscaping and planting would provide a softening effect, reducing the impact on the immediate landscape. The landscaping/planting can be addressed by a planning condition.

The visual impact of the proposed development is also considered to be acceptable. Some longer distance views of the development are possible, however, the development would appear as a minor component of the wider landscape. Furthermore, the existing wastewater treatment buildings and structures would provide an adjacent industrial context to the proposed development. It should also be noted that the limited height of the development ensures that the structures and buildings would not be overbearing nor disproportionate at this location. Furthermore, visibility from Port Glasgow and Greenock, which is below the upland plateau site, is significantly restricted due to the topography and elevation.

NPF4 states that landscape and visual impacts are to be expected as a result of renewables development. Therefore, a degree of tolerance to such impacts should be applied to any proposals for renewable energy. Should planning permission be granted, the installation and maintenance of acoustic fencing will have a secondary purpose of providing further screening of the development.

Ecology

The applicant has provided a Preliminary Ecological Appraisal (PEA) dated March 2024. There are no natural heritage designations within the site itself. The site is 0.4km from the nearest national designation (Knocknairs Hill SSSI) with two further SAC/SSSI/SPA designations 2.4 - 4km distant. The conclusion of the ecological assessment is that the site contains common improved grassland and scrub providing limited capacity for habitats. The assessment states the immediate and wider area does not provide suitable areas for the foraging, roosting and commuting for bats.

Potential nesting sites for bird species are also evident, although no evidence of ground nesting has been found. Otter, water vole and badger species are scoped out of the assessment.

Policy 3(b) of NPF4 applies in this case as the application is for a major development. It is considered that the ecological value of the site is minor. The nature of the development is such that the provision of local community benefits would be difficult to achieve. The planting proposed can however provide some habitat/biodiversity improvements to comply with the requirements of Policy 3 of NPF4. Impacts on protected species are unlikely given the nature and condition of much of the site.

Should planning permission be granted a requirement for pre-construction species and bird breeding protection plans will be required. Vegetation removal is required, and ground nesting birds will require protection in the breeding season (which should be subject to a condition).

It is accepted that the site is characterised by low habitat potential, and the ecological amenity value of the site is low. Despite a lack of protected species, it should be noted that such species can be mobile and in the case of bird species, can travel more than 10km for foraging (from areas of special protection), although physical connectivity for ground species is limited. Areas of ancient woodland are sufficiently distant to be unaffected by construction and operation activities (0.3 - 3.5km distant).

The applicant has submitted a Landscape Plan and Ecological Mitigation Statement which proposes sections of native wildflower seeding, new tree, shrub and hedgerow planting around most of the site perimeter and a retained/improved scrub area to the north. Existing trees will be retained where possible. Proposed additional tree planting is suggested to improve habitat potential, and six bird nest boxes will also be installed for passerine species. These proposals could provide biodiversity improvement due to improved habitat features. A planning condition can be attached to secure the planting being carried out. Subject to the attachment of conditions, the proposal is considered to generally comply with Policy 4 of NPF4.

Policy 33 of the adopted and proposed LDPs relates to biodiversity. The site at present has very limited habitat potential and of limited ecological value. The planting proposed can provide some habitat/biodiversity improvements to also comply with the requirements of Policy 33 of the adopted and proposed LDPs.

Impact on the Roads Network

The applicant has provided a Transport Statement and has confirmed that the maximum vehicles at one time, either for routine operation of the facility or maintenance, would be two vehicles. The Head of Service - Roads and Transportation has agreed that three parking spaces for the normal operation and maintenance of the facility is satisfactory. The applicant has demonstrated that three parking spaces can be provided to national minimum standards. A planning condition can be attached to ensure the parking bay dimensions meet national minimum standards. The applicant has provided an indicative temporary construction compound layout with approximately 17 temporary parking bays. If consented, this aspect can be addressed by a planning condition requiring full details of the temporary construction compound prior to the commencement of development.

In terms of Policy 10 of the adopted LDP and Policy 11 of the proposed LDP, the development is not considered to encourage a significant degree of private vehicle travel out with the construction period. Maintenance and operation of the development will only require a maximum of two vehicles at any given time. Given the scale and type of development, it is not considered that opportunities for walking and cycling would be a primary requirement. The site location is an urban fringe with vehicle access via a rural B classified road. The location is not considered to be well served by public transport, nor easily accessible by foot. Primarily, single trips during the construction period will be by car or van, although there is some potential for cycling to the site. Physical access to the site will be restricted for safety and operational reasons. The Head of Service - Roads and Transportation and Transport Scotland do not object to the proposed development.

The advice from the Head of Service - Roads and Transportation regarding the width of the access, maintaining sightlines paving the first 20m of the proposed access can be addressed by planning conditions should planning permission be granted. Transport Scotland did not request specific conditions to be added.

There may be some traffic impacts on the local roads network during the construction period. However, the construction phase is limited in duration, and the construction is relatively limited, with much of the activity relating to the delivery of battery storage units. Subject to appropriate controls such as a Construction Traffic Management Plan, which can be addressed by a condition, the impacts are capable of being mitigated.

The proposal is therefore considered to be acceptable under Policy 11 e) vi) of National Planning Framework 4 and under Policy 11 of the adopted Local Development Plan as well as Policy 12 of the proposed Local Development Plan.

Cumulative Impacts

Surrounding uses include individual residential properties, farm holdings and agricultural business premises. The site is 700m from the settlement boundary of Port Glasgow. Areas such as this at the fringe of urban areas often incorporate a variety of land uses, including electricity infrastructure, waste recycling or wastewater management, which are often located close to the boundaries of settlements for operational reasons. In conjunction with the existing buildings and structures in the surrounding area, the limited scale of the proposed development is such that there are no significant cumulative effects that alter the wider landscape character. It should be added that the landscape at this location is not considered to be of special value, is not a recognised designation or highly distinctive. Localised landscape impacts as a result of renewable energy developments are generally acceptable under NPF4.

Core Paths

The closest core path is 0.7km north of the site and visibility of the proposed development is limited by terrain and landform. Informal recreational routes are also evident in the wider area, such as around the reservoir systems on the upland plateau and the operational Inverclyde Wind Farm. Impacts from core paths only constitute a minor component of the entire route and would not significantly impact on the enjoyment of users.

As such the proposal is considered acceptable under Policy 11 e) iii) of National Planning Framework 4 and under the terms of Policy 38 of the adopted Local Development Plan as well as Policy 36 of the proposed Local Development Plan.

Flood Risk

Some localised flooding is observed towards the northeast of the site, however, out-with any area of physical development. Other noted issues include a blocked culvert and the presence of nearby functional reservoirs. Reservoir environments are tightly regulated to mitigate against overtopping and Knocknairs Hill Reservoir provides overspill compensation for Harelaw. The site is adjacent to a watercourse (Devol Burn which is the reservoir inlet) and on SEPA's Flood Maps, the area at flood risk is generally within the boundaries of the watercourse. The FRA accounts for the worst-case scenario, which incorporates potential threats from both reservoirs.

SEPA considers essential infrastructure developments of this type to be a relatively low risk land use, in that they can be designed to remain operational if the land floods, and they are unlikely to increase flood risk. SEPA has advised that the absence of land raising will ensure that the flood plain is not diminished in capacity by the development. Furthermore, areas of solid hard standing are limited and much of the proposed groundcover is permeable. In summary, there is capacity to accommodate a 1:200 flood risk.

A 134.9sqm SUDS basin is proposed which will incorporate two inspections per annum. Surface water from west to east is largely intercepted by public roads. Flow rates will also be contained by a hydro brake.

In terms of Policy 9 of the adopted LDP and Policy 10 of the proposed LDP the development is proposed to have a Sustainable Urban Drainage System (SUDS) to manage the surface water run-off from the site. The Head of Service - Roads and Transportation - has not objected to the proposal in terms of flooding or drainage. The provision of further drainage details can be addressed by a planning condition. The proposal complies with Policy 8 of the adopted LDP and Policy 9 of the proposed LDP as well as Policy 9 of the adopted LDP and Policy 10 of the proposed LDP in respect of flood risk and drainage respectively.

Private Water Supplies (PWS)

SEPA guidance indicates that most types of development should occur out with 250m from the point of groundwater and surface water abstraction. There are no properties within this distance of the proposed development. It is reasonable to conclude that the threat to private water supplies is low. The nature of the development is such that deep excavations are generally avoided. However, sources and abstraction points for private water supplies are often difficult to identify. Therefore, if the proposal is consented, a planning condition is necessary, requiring monitoring of sampling locations and appropriate mitigation, if impacts are identified.

Air Quality

Five main pollutants are at risk of exposure in the event of a combustion event. The applicant has provided an Air Quality Assessment. Although short term and limited occupational exposure to pollutants is possible, no significant health impacts are expected. Standard mitigation measures include preparing Communication Protocols; a Dust Management Plan; Site Management and Incident Recording; regular Monitoring Protocols; Site Preparation Measures; Machine Operation

Measures; Traffic Controls Measures; Waste Management Protocols and Demolition and Construction Procedures. The mitigation measures and steps are outlined in detail within the Air Quality Assessment. Fire risk from BESS is not a material planning consideration, however, impacts on air quality are relevant to Policy 23 of NPF4, Policies 4(d) and 12 of both the adopted Local Development Plan and Policies 4(d) and 13 of the proposed Local Development Plan.

Air quality monitoring will be undertaken in the event of any incident which may impact air quality. A Mitigation Plan may subsequently be required.

The proposed development is not considered to have a significant impact on air quality (subject to conditions) and is therefore considered to accord with policy 23 of NPF4, policy 4 of both the adopted and proposed Inverclyde Local Development Plans and policies 12 and 13 of the adopted and proposed Local Development Plans respectively.

Cultural Assets and Archaeology

There is a general absence of historic environment assets (i.e. Archaeology, Scheduled Monuments, Listed Buildings, Conservation Areas and Gardens and Designed Landscapes) in the immediate vicinity of the proposed development. There are two scheduled monuments (Roman Fortlet and Hut Circle) 1.2km west of the proposed site. Such scheduled monuments may have had funerary uses, and the appeal of the asset would rely to some extent on view to, and views from the monument. The Fortlet/Circle is a considerable distance from the proposed development and although the development will be clearly visible, the local landscape is characterised by contemporary industrial developments such as wind generation turbines, gasification and electricity transmission cables and infrastructure. There is however enough evidence of human activity to suggest that buried archaeological remains may be present around the site itself. Should planning permission be granted, an Archaeological Watching Brief can be addressed by a planning condition.

It is considered that the distance from listed buildings, scheduled monuments and conservation areas are sufficient to ensure that there are no unacceptable impacts on their settings. It is considered that the proposal is acceptable under the terms of Policy 7 of National Planning Framework 4 and Policy 7 of both the adopted and proposed Local Development Plans.

Noise Impact

Noise impacts from this type of development are a result of operation of the transformer, inverter(s) and air conditioning within the battery containers. A Noise Impact Assessment compliant with BS 4142 has been submitted with measurements taken from six noise sensitive locations.

The selected locations (NSR) are situated north, south and northeast of the site and include two locations within the Port Glasgow area (Alderwood Crescent and Mackie Avenue) and three individual properties on Douglielhill Road (Craigton View, Old filter station house (Dog Kennels), West Douglielhill Farm (derelict) plus Auchentiber Farm to the south of the proposed site.

The assessment uses typical lowest daytime and nighttime noise levels at the selected measurement positions. These noise levels are considered representative of the noise environment around the residential properties. The assessment accounts for the established profile of the general area as semi-rural/suburban. Predictions at the various NSR are informed by an indicative selection of potential plant that would produce noise. The report concludes that noise from the BESS is likely to be low impact and no mitigation is suggested.

As a precautionary approach, considering the position of the BESS on an urban fringe, and should the proposal receive consent, a condition requiring the installation and maintenance of acoustic fencing will be attached to any subsequent consent.

The Council's Public Protection Manager has stated that the operational noise rating level should not exceed 5dB(A) above background noise levels as calculated at residential noise sensitive receptors,

and the site should only operate with an acoustic fence/barrier in place. Suitable conditions should be added to any subsequent consent.

The proposal is therefore acceptable in this regard under Policy 11 e) i) of National Planning Framework 4 and under the quality of being "Safe and Pleasant in Policy 1 of both the adopted and proposed Local Development Plans.

Site Decommissioning and Restoration

Policy 11 e) of National Planning Framework 4 requires demonstration of how impacts are to be addressed including proposals for the decommissioning of developments, ancillary infrastructure, and site restoration.

The applicant has indicated that the intended lifetime of the proposal is 25 years after which the facility will be decommissioned, and the land restored to its former state. No other information regarding this has been submitted. Notwithstanding, given the type of development and its location, it is considered that decommissioning and site restoration is necessary at the end of the lifetime of the development. It is considered that a planning condition is necessary 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 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.

If 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. It is considered necessary for this to be addressed by a planning condition.

Conclusion

It is acknowledged that the development is within the green belt. The proposal represents a change at this location; however, this should be balanced against development of this type being required to store and distribute renewable energy produced to contribute towards the net zero targets. It should be noted that the site is not located in an entirely remote rural location and there are other forms of energy development in the local and wider area.

The proposed site is approximately 0.8km from the Devol sub-station and near the settlement boundary of Port Glasgow. Therefore, the requirement for the site to be accessible would be met. The visual and landscape impacts as a result of the development are localised, and benefit from some terrain shielding.

There will be landscape and visual impacts associated with the proposal, particularly until the proposed landscape planting becomes established and matures. These impacts are, however, limited and considered acceptable in the context of the benefits that the proposal will bring in terms of contributing to energy storage. The proposal will support the resilience of the electricity network and contribute to sustainable development, providing for greater and more efficient use of renewable energy generation in the electricity system, and in this regard, it will contribute to greenhouse gas emission reduction targets.

The benefits of the proposed development are considered to outweigh any adverse impacts. The proposal is therefore considered to be acceptable when assessed against the relevant policies of National Planning Framework 4, the adopted Inverclyde Local Development Plan as well as the proposed Inverclyde Local Development Plan. There are no material considerations that outweigh the policies.

RECOMMENDATION

That the application be granted subject to the following conditions:

1. The development to which this permission relates must be begun within 3 years from the date of this permission.

Reason: To comply with Section 58 of the Town and Country Planning (Scotland) Act 1997 (as amended).

2. The battery energy storage facility hereby approved shall not exceed 49.9MW in generating capacity.

Reason: To ensure the development complies with the development consented and electricity generation exceeding this capacity requires consent under different legislation.

3. Development shall not commence until the applicant/developer has submitted details of private water sampling locations, background baseline monitoring details and a timescale for reporting for the approval in writing by the Planning Authority. Should the sampling thereafter indicate that there have been adverse impacts on the Private Water Supply, a Scheme of Mitigation shall be submitted to and approved in writing by the Planning Authority and shall take immediate effect upon such approval.

Reason: To protect the source and quality of private water supplies.

4. Development shall not commence unless and until a finalised Landscaping Plan has been submitted to and received the written approval of the Planning Authority. The Landscaping Plan shall include, however not be limited to: -

(i) Details, including plans, sufficient to identify the location of all proposed landscape planting on site.

(ii) Details of the species composition and layout of proposed landscape planting (including the use of semi-mature trees where practicable), evidencing the proposals will be capable of providing effective screening of the development.

(iii) Details of the management of the landscape planting to ensure it establishes and is maintained throughout the lifetime of the development, providing effective screening of the development.

(iv) Details of the timetable for the implementation of the planting detailed within the Landscaping Plan.

The approved Landscaping Plan shall thereafter be implemented in full, in accordance with the approved plans and in line with the approved timetable, unless otherwise agreed in writing in advance by the Planning Authority.

Reason: To ensure planting undertaken will provide effective screening of the development and will be maintained in an effective condition for the lifetime of the development, in the interests of visual amenity

5. Development shall not commence unless and until a Construction Traffic Management Plan (CTMP) has been submitted to and received the written approval of the Planning Authority, in consultation with Roads and Transportation and Transport Scotland. The CTMP shall include however not be limited to details of:

(i) The routing of all traffic associated with the development on the local road network, including on the trunk road network to access the site, and measures to ensure that the specified routes are adhered to, including monitoring procedures; construction traffic management and mitigation

measures and timings thereof; permits, junction widening, routes and volumes for imported materials, and any associated signage.

(ii) Mitigation and Traffic Management Measures to ensure that construction traffic is managed to reduce the impacts on public roads, drainage, structures and other street furniture and reduce the impact on the road condition.

(iii) Traffic Management and Site Protocol, including details of measures to prevent loose or deleterious material being deposited on the local road network, including wheel cleaning and lorry sheeting facilities and measures to clean the site entrances and the adjacent local road network if required.

(iv) Details of any additional signing or temporary traffic control measures deemed necessary due to the size or length of loads being delivered, such measures must be undertaken by a recognised Quality Assured Traffic Management Consultant.

(v) Any weight restrictions on the delivery route shall be reported and complied with during usage of the routes.

(vi) Any temporary site access signage and temporary traffic management measures for the construction of the site access.

The CTMP as approved shall thereafter be implemented in full and always adhered to, unless otherwise agreed in advance in writing by the Planning Authority.

Reason: In the interests of road safety and to ensure that impacts on routes and communities are adequately assessed and used to inform appropriate mitigation measures.

6. For the avoidance of doubt parking spaces in the site shall be a minimum of 2.5m by 5.0m with a minimum of 6m aisle spacing.

Reason: To ensure parking space dimensions meet national standards.

7. For the avoidance of doubt visibility splays of 2.4m x 90.0m x 1.05m shall be always maintained at the vehicular access with Douglichill Road as shown on drawing SD-03 Rev 02.

Reason: In the interests of road safety.

8. For the avoidance of doubt: the vehicular access to the site shall be fully paved for a minimum of 20m; the gradient of access shall not exceed 10%; and the minimum width of the access shall be 4.8m for the first 20m.

Reason: To prevent loose driveway material being spilled onto the road and in the interests of residential amenity and road safety.

9. Development shall not commence unless and until full details, including location, dimensions and specification of the Acoustic Fences, including their noise attenuation properties, have been submitted to and approved in writing by the Planning Authority. The Acoustic Fences shall thereafter be installed on site before the first commissioning of the development and shall remain in position for the lifetime of the development, in accordance with the details approved unless otherwise agreed in writing in advance by the Planning Authority.

Reason: To ensure appropriate mitigation is secured and implemented in the interests of residential amenity.

10. In the event of any suspected contamination or Japanese Knotweed being discovered, site works shall cease with immediate effect and the matter brought to the attention of the Planning Authority: thereafter, site works may not recommence until a Remediation Scheme (to be submitted for the prior written approval of the Planning Authority) has been completed to the satisfaction of the Planning Authority.

Reason: To ensure that any contamination and Japanese Knotweed concerns are managed appropriately.

11. Development shall not commence unless and until full details of all Site Lighting have been submitted to and approved in writing by the Planning Authority. The details shall include however shall not be limited to:

- (i) The location of all temporary and permanent site lighting, and full details including elevation plans of the lighting columns/units proposed.
- (ii) Lux levels of the temporary and permanent site lighting and details of the lighting unit model, noting all permanent lighting units will require to be motion-activated in nature.
- (iii) Measures, including directional positions of lighting, to reduce light pollution/spillage in the surrounding area.

For the avoidance of doubt, all permanent site lighting shall be motion-activated in nature and the site shall not be otherwise lit during hours of darkness, save for being activated by movement within the site.

The lighting shall be implemented on site in accordance with the approved details.

Reason: To ensure appropriate lighting is operated on site with mitigation to protect amenity and in the interests of ecology and the environment.

12. Development shall not commence unless and until details and specifications of all development infrastructure have been submitted to and approved in writing by the Planning Authority. These details shall include however not limited to:

- (i) Dimensions of all infrastructure components, buildings and structures forming the development.
- (ii) Details of the make and model of infrastructure units to be installed on site, including sound level output where relevant.
- (iii) The external colour and/or finish of all development infrastructure.

The development infrastructure shall thereafter be installed in accordance with the details approved above and maintained in the approved colour, free of rust and discolouration for the lifetime of the development.

Reason: To ensure the colour of all built elements within the site is reflective of the landscape setting in the interests of visual amenity.

13. All vegetation clearance, tree felling, soil stripping and construction works shall be undertaken out with the breeding bird season (March to August inclusive). Where this is not possible, nesting/breeding bird surveys shall be undertaken by an appropriately qualified ornithologist, of any areas to be the subject of vegetation clearance, tree felling, soil stripping or construction works and the results of the surveys shall be used to produce a Bird Protection Plan (BPP) to be submitted for the written approval of the Planning Authority prior to any such activities taking place on site. The BPP shall include full details of the surveys carried out and their results, all necessary mitigation and operational protocols appropriate to the species identified during the surveys, including any appropriate buffers to prevent or minimise disturbance of birds during vegetation clearance, tree felling, soil stripping and construction works and any post-construction restoration. The Bird Protection Plan approved above shall thereafter be implemented in full in accordance with the

approved details during all vegetation clearance, tree felling, soil stripping and construction works, and post-construction restoration works.

Reason: To ensure protection of the environment of breeding birds

14. Not more than three months prior to the commencement of development, Ecology Pre-commencement Surveys shall be conducted to determine the presence or otherwise of bats, otters, badgers, red squirrels, reptiles and other protected species which may be present on site. Details of the surveys and the results of the surveys shall be submitted to the Planning Authority prior to the commencement of development. Where the surveys required above indicate that any protected species are present on site or could be affected by the development, Species Protection Plans, specific to each relevant species, detailing all mitigation required shall be submitted for the written approval of the Planning Authority, prior to the commencement of development. Any Species Protection Plans approved above shall be implemented in full as approved during all construction works.

Reason: To ensure that adequate ecological protection is implemented, in the interests of minimising adverse effects on the species.

15. Development shall not commence until a detailed Decommissioning and Restoration Scheme has been submitted to and approved in writing by the Planning Authority. The Scheme shall detail the measures for the decommissioning and removal of the containers, batteries and associated ancillary infrastructure and restoration of the site thereafter to restore the site to its former condition or such other condition as agreed in writing by the Planning Authority. The scheme shall cover however not be limited to the following matters:

- (i) works for the removal of all containers, batteries and ancillary infrastructure.
- (ii) environmental management provisions to be implemented throughout the decommissioning and restoration period.
- (iii) details of the restoration works and timetable for all decommissioning and restoration works.
- (iv) details of aftercare provisions to ensure the restoration has been successful.

No later than 6 months prior to the expiry of this consent, or intended decommissioning of the development, whichever is earlier, the containers, batteries and ancillary infrastructure will be decommissioned and removed from site and restoration undertaken in accordance with the decommissioning and restoration scheme approved above.

Reason: To ensure the satisfactory restoration of the site in a suitable and environmentally acceptable manner, in the interests of safety, amenity and environmental protection.

16. For the avoidance of doubt if the battery storage facility does not import or export electricity to and from the grid for a continuous period of 12 months the applicant/developer shall, no later than the date of expiration of the 12 months period, submit a scheme to the Planning Authority setting out how the development is to be removed from the site and fully restored. Thereafter, the approved scheme shall be implemented within 12 months of the date of approval, unless otherwise agreed in writing by the Planning Authority.

Reason: In the interests of maintaining control of the development should it become redundant and to ensure that the site is restored.

17. Development shall not commence unless the applicant/developer has delivered a bond or other form of financial guarantee in terms acceptable to the Planning Authority which secures the cost of performance of all decommissioning, restoration and aftercare obligations contained in Condition 15 to the Planning Authority. The financial guarantee shall thereafter be maintained in favour of the Planning Authority until the date of completion of all restoration and aftercare obligations. The value of the financial guarantee shall be determined by a suitably qualified independent professional as

being sufficient to meet the costs of all decommissioning, restoration and aftercare obligations contained in Condition 15. The value of the financial guarantee shall be reviewed by a suitably qualified independent professional no less than every five years and increased or decreased to take account of any variation in costs of compliance with restoration and aftercare obligations and best practice prevailing at the time of each review.

Reason: To ensure that sufficient funds are in place to cover the completion of the restoration works together with any failure of the restoration works or in the aftercare arrangements associated with the site restoration and the decommissioning of the above ground infrastructure, in the interests of protecting and minimising the impact on the environment and surrounding area.

18. Development shall not commence until final details of the external appearance, dimensions and finishing and surface materials of the temporary construction compound and parking areas and any fencing, lighting or other ancillary structures associated with the temporary construction compound have been submitted to and approved in writing by the Planning Authority.

The temporary construction compound and its associated ancillary infrastructure shall be implemented in accordance with the details approved above, unless otherwise agreed in writing by the Planning Authority.

Reason: To ensure the temporary construction compound is constructed in accordance with the approved plans.

19. The noise Rating Level from the operation of the development, including all associated infrastructure hereby approved, shall not exceed 5 dB(A) above the background sound levels as measured or calculated at the curtilage of any occupied residential Noise Sensitive Receptors (as existing or consented at the time of this consent) as defined in BS:4142.

Reason: To protect the occupiers of dwellings or noise sensitive buildings from excessive noise.

20. Development shall not commence until details of the proposed surface water drainage have been submitted to and approved in writing by the Planning Authority. Following approval, the surface water drainage shall be fully implemented on site.

Reason: To avoid impacts on the water environment and mitigate flood risk and runoff.

21. Development within the site as outlined in red on the approved plan shall not commence unless and until the developer has secured the implementation of a Programme of Archaeological Works in accordance with a written scheme of investigation which has been submitted by the applicant and approved by the Planning Authority. Thereafter, the developer shall ensure that the Programme of Archaeological Works is fully implemented and that all recording and recovery of archaeological resources within the development site is undertaken.

Thereafter the developer shall ensure that the Programme of Archaeological Works as approved above is fully implemented and that all recording and recovery of archaeological resources within the development site is undertaken in accordance with the approved scheme.

Reason: To ensure archaeological interests that may exist or be discovered on the site are not destroyed or disturbed without being recorded.

22. In the event of any incident occurring at the development which would result in an adverse impact on the air quality (such as a thermal runaway or gaseous release) air quality monitoring will be organised immediately at sensitive receptor locations. The air quality monitoring should cover site specific gaseous contaminants. Air Quality Reports shall be sent to the Public Health Manager for review accompanied by a Pollution Mitigation Plan within 48hrs of the event. Monitoring shall continue until the satisfaction of the Council as Planning Authority, in consultation with the Public Health Manager.

Reason: To safeguard and maintain the air quality, where affected by the development.

Neale McIlvanney
Interim Director
Regeneration

Local Government (Access to Information) Act 1985 – Background Papers. For further information please contact Colin Lamond on 01475 712422.