

Report To: The Planning Board

Date: 6th August 2025

Report By: Interim Director - Regeneration

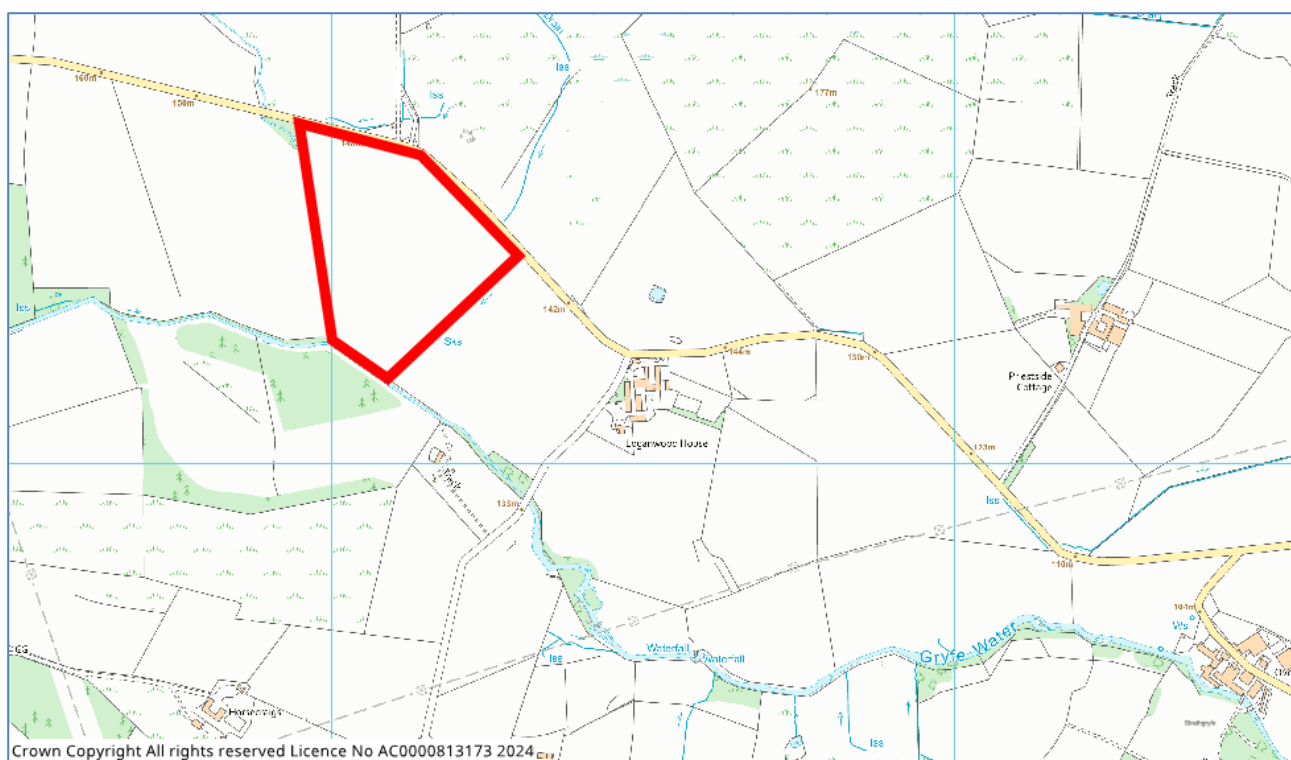
Report No: 25/0001/EAA

**Contact
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Subject: Siting of Battery Energy Storage System (BESS) of up to 400 MW capacity, associated access improvements, substation, construction compound/laydown and ancillary works including landscaping and SUDS at

Land at Loganwood House, High Mathernock Farm, Kilmacolm



SUMMARY

- This a consultation with the Council by the Scottish Ministers under the Section 36 of the Electricity Act 1989.
- The proposal is not acceptable with regards to the relevant policies of National Planning Framework 4 as well as both the adopted and proposed Inverclyde Local Development Plans.
- The recommendation is to object to the proposal.

The application may be viewed at:

[Scottish Government - Energy Consents Unit - Application Details](#)

INTRODUCTION

Proposals to construct generating stations that exceed 50 megawatts require consent under Section 36 of the Electricity Act 1989 and Scottish Ministers are responsible for approving applications for these development proposals. As such an application has been made by Harmony HM Ltd to the Scottish Ministers to install a battery storage facility with associated ancillary infrastructure at land at Loganwood House, High Matherknock Farm, Kilmacolm (Scottish Government reference number ECU00005083). A battery storage facility is considered to be a generating station.

The Scottish Ministers are required to consult the Planning Authority where the development is located, NatureScot (former known as Scottish Natural Heritage), the Scottish Environment Protection Agency, Historic Environment Scotland, as well as other relevant consultees and take their views into account during the decision-making process.

In circumstances where important issues are raised, Scottish Ministers can decide to hold a public local inquiry before decisions are taken, including if objected to by the Planning Authority or other consultee.

On granting consent under Section 36 the Ministers may also direct that planning permission for that development shall be deemed to be granted in terms of Section 57(2) of the Town and Country Planning (Scotland) Act 1997. The consent and deemed planning permission may be subject to conditions.

It should be noted that Scottish Ministers have adopted an EIA Screening Opinion prior to the submission of the application on 25th October 2024 under the Electricity Works (Environmental Impact Assessment) (Scotland) Regulations 2017, which concluded that the proposed development did not require an Environmental Impact Assessment (EIA).

SITE DESCRIPTION

The application site comprises a field located on the south side of Auchentiber Road, and the site area extends to 3.1 hectares. The site is in the rural area/green belt approximately 2km to the south of Port Glasgow and approximately 2.7km to the north-west of Kilmacolm.

The field is currently used for agricultural purposes and is delineated by low-lying hedgerows forming boundaries to the east and west (the Gryffe Water provides the southern boundary). The field undulates and the ground levels drop across the field in a general north to south direction. The site levels fall from the high point of approximately 145m Above Ordnance Datum (AOD) at Auchentiber Road to a low point of approximately 133m at the southern boundary (Gryffe Water).

The Gryffe Water runs along the southern boundary of the site, and it features trees which flank its banks. There is an area of woodland at the southern fringe of the site.

The area surrounding the site is largely composed of agricultural land, with some individual rural dwellinghouses located throughout the landscape. The nearest properties are High Matherknock/Loganwood House (250m west), The Haven (560m south), Auchenfoyle (850m southwest) and Priestside (1.2km).

The Devol Moor sub-station is located approximately 1.7km to the north-west of the site. There are wind turbines on land to the north of the application site. There are also electricity pylons/overhead lines traversing the landscape.

PROPOSAL

The proposal is for a 350-megawatt (MW) Battery Energy Storage Facility and associated infrastructure. The proposal is to allow electricity from the national grid to be stored in batteries at times of low demand and then exported back to the grid at times of high demand. This is intended to prop up the grid and provide a more reliable supply of energy to users. 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 proposed development is to comprise 87 containerised units to house battery energy storage systems and associated ancillary infrastructure. The containers will each measure up to approximately 18m (length); 4m (width) and 3.5m (height).

Heating, liquid cooling and ventilation systems will be integrated into each container unit. A control room and inverter (9m x 1.6 x 2.85m) are assigned to every 11 containers. A 33kw transformer (2.5m x 2m x 2.5m) is also assigned for each container.

Each battery container has a fire suppression system which constitutes an automated aerosol system.

Cabling between battery containers will be achieved via above ground cable trays and some underground trenches (0.7m x 1.6m).

Sub-station compound

The sub-station compound is proposed with dimensions of 45m x 80m x 9m (height). The northern section of the compound will house transformer, disconnector, surge protector and circuit breaker infrastructure. The mid-section of the compound features an access, turning area and diesel generator. A modular control building is located to the south of the compound (incorporating a recreation area, telecoms room, a control room, protection room and welfare facilities). Door openings are on three elevations.

Control room buildings

Eight control room buildings are located throughout the container array. Each building is proposed to be 12m x 2m x 2.5m (height) with a single personnel door for access.

Customer sub station

A customer substation is located to the immediate north of the sub station compound. The pitched roof building is proposed to be 8m x 17m x 6.7m (height) with six openings on two elevations.

Ground modelling/alterations

A single platform for the development at 138m AOD will be created via cut and fill. The process will also achieve an 'aggregate neutral' outcome with no importation of aggregate required for the construction. A retaining wall will be constructed along the northern perimeter of the site (4-6m high using gabion baskets).

Access road

Access tracks 4m in width will be constructed within the site to service the infrastructure. The access tracks will be constructed from hardcore or gravel over a substrate. Two accesses will be formed from Auchentiber Road (northeast and northwest corners). One will function as an emergency access. A parking area to the eastern periphery of the site is also annotated.

Boundary fencing

A palisade fence to a height of 3.5m height will be installed around the development site perimeter. A 3m high acoustic (noise absorption) fence will be constructed around the battery array.

CCTV and security lighting

CCTV will be mounted on green coloured steel poles to a height of 3m. The cameras will be inward focused. Low level direction lighting on 3m high poles will provide maintenance lighting and activation triggered security. The site will not generally be lit at night unless triggered by a security breach.

Landscape

Tree planting is proposed to the north, south, east and west. A southern stretch of wet meadow planting is proposed, which also encircles the proposed SUDS pond. A broad section of wildflower meadow is proposed along the far southern boundary. A native woodland mix for the wet meadow and a hedgerow mix will be included.

Connection to Devol Moor sub-station

An underground cable is to connect the site to the Devol Moor sub-station. It has been indicated the final route of the grid connection has yet to be confirmed, however a connection date in 2029 is likely. The cable route is not part of this submission.

Indicated construction period

It has been indicated the development is to have a construction period of 18 months.

Submitted reports

The Section 36 Application has been accompanied by: an Air Quality Impact assessment (November 2024); an Archaeological Assessment (August 2024); a Flood Risk Assessment including Sustainable Drainage (November 2024); an Ecological Desk Study (December 2024); a Breeding Bird Survey Report (December 2024); a Protected Species Survey Report (December 2024); a Vegetation Classification Survey Report (December 2024); an Outline Construction Environmental Management Plan (December 2024); a Geology, Soils and Groundworks Strategy Report (February 2025); a Landscape and Visual Impact Assessment (July 2024); Noise Impact Assessment (February 2025); Construction Traffic Management Plan and Transport Statement (November 2024); Battery Safety Management Plan (December 2024); and a Socio-Economic Benefit Statement (November 2024).

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.

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

Policy 1 - Tackling the Climate and Nature Crises

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

Policy 2 - Climate Mitigation and Adaption

- 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 longterm retention and monitoring should be included, wherever appropriate;
- and v. local community benefits of the biodiversity and/or nature networks have been considered.

c) Proposals for local development will include appropriate measures to conserve, restore and enhance biodiversity, in accordance with national and local guidance. Measures should be proportionate to the nature and scale of development. Applications for individual householder development, or which fall within scope of (b) above, are excluded from this requirement.

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

a) Development proposals which by virtue of type, location or scale will have an unacceptable impact on the natural environment, will not be supported.

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 5 - Soils

a) Development proposals will only be supported if they are designed and constructed:

- i. In accordance with the mitigation hierarchy by first avoiding and then minimising the amount of disturbance to soils on undeveloped land; and
- ii. In a manner that protects soil from damage including from compaction and erosion, and that minimises soil sealing.

b) Development proposals on prime agricultural land, or land of lesser quality that is culturally or locally important for primary use, as identified by the LDP, will only be supported where it is for:

- i. Essential infrastructure and there is a specific locational need and no other suitable site;
- ii. Small-scale development directly linked to a rural business, farm or croft or for essential workers for the rural business to be able to live onsite;
- iii. The development of production and processing facilities associated with the land produce where no other local site is suitable;
- iv. The generation of energy from renewable sources or the extraction of minerals and there is secure provision for restoration; and

In all of the above exceptions, the layout and design of the proposal minimises the amount of protected land that is required.

Policy 6 - Forestry, Woodland and Trees

a) Development proposals that enhance, expand and improve woodland and tree cover will be supported.

b) Development proposals will not be supported where they will result in

- i. Any loss of ancient woodlands, ancient and veteran trees, or adverse impact on their ecological condition;
- ii. Adverse impacts on native woodlands, hedgerows and individual trees of high biodiversity value, or identified for protection in the Forestry and Woodland Strategy;
- iii. Fragmenting or severing woodland habitats, unless appropriate mitigation measures are identified and implemented in line with the mitigation hierarchy;
- iv. Conflict with Restocking Direction, Remedial Notice or Registered Notice to Comply issued by Scottish Forestry.

c) Development proposals involving woodland removal will only be supported where they will achieve significant and clearly defined additional public benefits in accordance with relevant Scottish Government policy on woodland removal. Where woodland is removed, compensatory planting will most likely be expected to be delivered.

d) Development proposals on sites which include an area of existing woodland or land identified in the Forestry and Woodland Strategy as being suitable for woodland creation will only be supported where the enhancement and improvement of woodlands and the planting of new trees on the site (in accordance with the Forestry and Woodland Strategy) are integrated into the design.

Policy 7 - Historic Assets and Places

a) Development proposals with a potentially significant impact on historic assets or places will be accompanied by an assessment which is based on an understanding of the cultural significance of the historic asset and/or place. The assessment should identify the likely visual or physical impact of any proposals for change, including cumulative effects and provide a sound basis for managing the impacts of change.

Proposals should also be informed by national policy and guidance on managing change in the historic environment, and information held within Historic Environment Records.

h) Development proposals affecting scheduled monuments will only be supported where:

- i. direct impacts on the scheduled monument are avoided;
 - ii. significant adverse impacts on the integrity of the setting of a scheduled monument are avoided;
- or
- iii. exceptional circumstances have been demonstrated to justify the impact on a scheduled monument and its setting and impacts on the monument or its setting have been minimised.

Policy 8 - Green Belts

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

i) they are for:

- development associated with agriculture, woodland creation, forestry and existing woodland (including community woodlands);
- residential accommodation required and designed for a key worker in a primary industry within the immediate vicinity of their place of employment where the presence of a worker is essential to the operation of the enterprise, or retired workers where there is no suitable alternative accommodation available;
- horticulture, including market gardening and directly connected retailing, as well as community growing;
- outdoor recreation, play and sport or leisure and tourism uses; and developments that provide opportunities for access to the open countryside (including routes for active travel and core paths);
- flood risk management (such as development of blue and green infrastructure within a “drainage catchment” to manage/mitigate flood risk and/or drainage issues);
- essential infrastructure or new cemetery provision;
- minerals operations and renewable energy developments;
- intensification of established uses, including extensions to an existing building where that is ancillary to the main use;
- the reuse, rehabilitation and conversion of historic environment assets; or
- one-for-one replacements of existing permanent homes.

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; and
- 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. These include:

- i. wind farms including repowering, extending, expanding and extending the life of existing wind farms;
- ii. enabling works, such as grid transmission and distribution infrastructure;
- iii. energy storage, such as battery storage and pumped storage hydro;
- iv. small scale renewable energy generation technology;
- v. solar arrays;
- vi. proposals associated with negative emissions technologies and carbon capture; and
- vii. proposals including co-location of these technologies.

b) Development proposals for wind farms in National Parks and National Scenic Areas will not be supported.

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.

d) Development proposals that impact on international or national designations will be assessed in relation to Policy 4.

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.

f) Consents for development proposals may be time-limited. Areas identified for wind farms are, however, expected to be suitable for use in perpetuity.

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.

c) Development proposals that are poorly designed, detrimental to the amenity of the surrounding area or inconsistent with the six qualities of successful places, will not be supported.

iii. that build in resilience to the effects of climate change and where appropriate incorporate blue and green infrastructure and nature rich habitats (such as natural planting or water systems).

b) Development proposals will be supported where it can be demonstrated that the transport requirements generated have been considered in line with the sustainable travel and investment hierarchies and where appropriate they:

i. Provide direct, easy, segregated and safe links to local facilities via walking, wheeling and cycling networks before occupation;

ii. Will be accessible by public transport, ideally supporting the use of existing services;

iii. Integrate transport modes;

iv. Provide low or zero-emission vehicle and cycle charging points in safe and convenient locations, in alignment with building standards;

- v. Supply safe, secure and convenient cycle parking to meet the needs of users and which is more conveniently located than car parking;
 - vi. Are designed to incorporate safety measures including safe crossings for walking and wheeling and reducing the number and speed of vehicles;
 - vii. Have taken into account, at the earliest stage of design, the transport needs of diverse groups including users with protected characteristics to ensure the safety, ease and needs of all users; and
 - viii. Adequately mitigate any impact on local public access routes.
- c) Where a development proposal will generate a significant increase in the number of person trips, a transport assessment will be required to be undertaken in accordance with the relevant guidance.
 - d) Development proposals for significant travel generating uses will not be supported in locations which would increase reliance on the private car, taking into account the specific characteristics of the area.
 - e) Development proposals which are ambitious in terms of low/no car parking will be supported, particularly in urban locations that are well-served by sustainable transport modes and where they do not create barriers to access by disabled people.
 - f) Development proposals for significant travel generating uses, or smaller-scale developments where it is important to monitor travel patterns resulting from the development, will only be supported if they are accompanied by a Travel Plan with supporting planning conditions/obligations. Travel plans should set out clear arrangements for delivering against targets, as well as monitoring and evaluation.
 - g) Development proposals that have the potential to affect the operation and safety of the Strategic Transport Network will be fully assessed to determine their impact. Where it has been demonstrated that existing infrastructure does not have the capacity to accommodate a development without adverse impacts on safety or unacceptable impacts on operational performance, the cost of the mitigation measures required to ensure the continued safe and effective operation of the network should be met by the developer.

While new junctions on trunk roads are not normally acceptable, the case for a new junction will be considered by Transport Scotland where significant economic or regeneration benefits can be demonstrated. New junctions will only be considered if they are designed in accordance with relevant guidance and where there will be no adverse impact on road safety or operational performance.

Policy 22 - Flood Risk and Water Management

- a) Development proposals at risk of flooding or in a flood risk area will only be supported if they are for:
 - i. essential infrastructure where the location is required for operational reasons;
 - ii. water compatible uses;
 - iii. redevelopment of an existing building or site for an equal or less vulnerable use; or.
 - iv. redevelopment of previously used sites in built up areas where the LDP has identified a need to bring these into positive use and where proposals demonstrate that long-term safety and resilience can be secured in accordance with relevant SEPA advice.

The protection offered by an existing formal flood protection scheme or one under construction can be taken into account when determining flood risk.

In such cases, it will be demonstrated by the applicant that:

- all risks of flooding are understood and addressed;
- there is no reduction in floodplain capacity, increased risk for others, or a need for future flood protection schemes;
- the development remains safe and operational during floods;
- flood resistant and resilient materials and construction methods are used; and
- future adaptations can be made to accommodate the effects of climate change.

Additionally, for development proposals meeting criteria part iv), where flood risk is managed at the site rather than avoided these will also require:

- the first occupied/utilised floor, and the underside of the development if relevant, to be above the flood risk level and have an additional allowance for freeboard; and
- that the proposal does not create an island of development and that safe access/egress can be achieved.

b) Small scale extensions and alterations to existing buildings will only be supported where they will not significantly increase flood risk.

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-green infrastructure. All proposals should presume no surface water connection to the combined sewer;

iii. seek to minimise the area of impermeable surface.

d) Development proposals will be supported if they can be connected to the public water mains. If connection is not feasible, the applicant will need to demonstrate that water for drinking water purposes will be sourced from a sustainable water source that is resilient to periods of water scarcity.

e) Development proposals which create, expand or enhance opportunities for natural flood risk management, including blue and green infrastructure, will be supported.

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 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 development proposals, consideration must be given to the factors set out in Figure 3. 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 on:

- a) the green network (including landscape), and historic buildings and places;
- 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

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 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 15 - Soils

Development on prime agricultural land or affecting carbon rich soils will only be supported if:

- a) it is on land allocated for development in this Local Development Plan or meets a need identified in the Strategic Development Plan;
- b) there is a specific locational need for the development;
- c) it is for small scale development directly linked to a rural business; or
- d) it is for renewable energy generation or mineral extraction, and the proposals include provision for the site to be returned to its former status.

For carbon rich soils, it will also need to be demonstrated that adverse impacts on the soil resource during the construction and operational phases of a development will be minimised and the development will not result in a net increase in CO2 emissions over its lifetime.

Policy 31 - Scheduled Monuments and Archaeological Sites

Development that would potentially have an adverse effect on a Scheduled Monument or the integrity of its setting will only be permitted in exceptional circumstances. Development affecting archaeological sites should seek to preserve the archaeological resource in situ.

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:

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

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: Development affecting Protected Species will only be permitted where:

- it preserves public health or public safety or is for other imperative reasons of overriding public interest including those of a social or economic nature and has beneficial consequences of primary importance for the environment;
- there is no satisfactory alternative; and
- it maintains the species in a favourable conservation status.

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.

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 34 - Trees, Woodland and Forestry

The Council supports the retention of ancient and semi-natural woodland, trees covered by Tree Preservation Orders and other trees and hedgerows, which have significant amenity, historical, ecological, landscape or shelter value. Where the removal of such woodland, trees or hedgerows is proposed as part of a planning application, this will not be supported unless:

- a it can be clearly demonstrated that the development cannot be achieved without removal;
- b the public benefits of the proposal outweigh the loss of trees/hedgerows; and
- c compensatory planting will be provided, to a standard agreed by the Council.

Development affecting trees will be assessed against Supplementary Guidance to be prepared by the Council. This will also cover the protection of ancient woodlands and the management and protection of existing and new trees during and after the construction phase.

Policy 38 - Path Network

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.

Where applicable, development proposals will be required to provide new paths in order to encourage active travel and/or connectivity to the green network. The provision of routes along water will be an essential requirement on development sites with access to a waterfront, unless not appropriate for operational or health and safety reasons.

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 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 2 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 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 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 16 - Soils

Development on prime agricultural land will only be supported if:

- a) it is on land allocated for development in this Local Development Plan or meets a need identified in the Strategic Development Plan;
- b) there is a specific locational need for the development;
- c) it is for small scale development directly linked to a rural business; or
- d) it is for renewable energy generation or mineral extraction, and the proposals include provision for the site to be returned to its former status.

Development should avoid the unnecessary disturbance of peat and carbon-rich soils. Best practice must be adopted in the movement, storage, management and reinstatement of peat and carbon-rich soils.

Where peat and carbon rich soils are present on an application site, a depth survey must be undertaken which demonstrates that areas of deep peat have been avoided as far as is possible. A peat management plan must also be produced, detailing mitigation measures which demonstrate that the unnecessary disturbance, degradation or erosion of peat will be avoided. It will also need to be demonstrated that adverse impacts on the soil resource during the construction and operational phases of a development will be minimised and the development will not result in a net increase in CO2 emissions over its lifetime.

Policy 31 - Scheduled Monuments and Archaeological Sites

Development that would potentially have an adverse effect on a Scheduled Monument or the integrity of its setting will only be permitted in exceptional circumstances.

Development affecting archaeological sites should seek to preserve the archaeological resource in situ. Where this is not possible, the developer will be required to fully record the archaeological resource for archiving, prior to development commencing.

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:

- there are no alternative solutions; and
- there are imperative reasons of overriding public interest, including those of a social or economic nature; and
- 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:

- the setting of buildings and settlements within the landscape
- the pattern of woodlands, fields, hedgerows and trees; especially where they define/ create a positive settlement/ urban edge
- the character and distinct qualities of river corridors
- historic landscapes
- 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 35 - Trees, Woodland and Forestry

The Council supports the retention of trees, including ancient and semi-natural woodland, trees covered by Tree Preservation Orders and other trees and hedgerows, which have significant amenity, historical, ecological, landscape or shelter value. Where the removal of such woodland, trees or hedgerows is proposed as part of a planning application, this will not be supported unless:

- it can be clearly demonstrated that the development cannot be achieved without removal; or
- the public benefits of the proposal outweigh the loss of trees/hedgerows; and
- compensatory planting will be provided, to a standard agreed by the Council.

Development affecting trees will be assessed against Supplementary Guidance to be prepared by the Council.

Proposals for new forestry/woodland planting will be assessed with regard to the policies of this Plan and the Forestry and Woodland Strategy for the Glasgow City Region.

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 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

The Planning Authority is not responsible for consulting on this type of application, rather it is a consultee in the application process.

Consultation responses have been submitted to the Scottish Government Energy Consents Unit, who administer the application process. The available responses from the consultees are on the Scottish Government Energy Consents Unit website and are indicated/summarised below for information purposes.

Scottish Gas Networks – high pressure gas network (G12) is 17m from the development area. Scottish Gas Networks do not object to the development providing the developer consults with SGN with regards to the electrical cable route and all works within 35m of the pipeline. A range of developmental activities may have a negative impact on the pipeline and SGN advice should be sought if necessary.

National Air Traffic Service - the proposed development has been examined from a technical safeguarding aspect and does not conflict with their safeguarding criteria. Accordingly, NATS (En Route) Public Limited Company ("NERL") has no safeguarding objection to the proposal.

Scottish Water - has no objection to the proposal. There are no catchments or abstraction points that would be affected by the proposed development. Written permission must be sought before works commence on infrastructure in proximity to the development area. Scottish Water will not normally allow connections to the combined sewer system. An application for connections to public or wastewater is required.

Health and Safety Executive (HSE) – advise that they have an interest in proposals where developments will be in HSE zones. The development is not within a consultation zone. HSE has only limited interest in BESS developments. The proposal does not require the use or handling of hazardous material.

BT Group - conclude that the location should not cause interference to BT's current and presently planned radio network. BT requires 100m minimum clearance from any structure to the radio link path.

Historic Environment Scotland - advise that the setting of scheduled monument 'AA Battery and Camp' (SM12883) would be impacted by the development however not to an extent that issues of national importance would be raised. Proposed planting should mitigate impacts, and it is advised that the development should not break the skyline when viewed from the monument. Comments previously supplied to the applicant by Historic Environment Scotland have been addressed at the design stage and HES will make no further comment.

SEPA – have no objection, and that the developer should refer to the relevant SEPA standing advice.

Transport Scotland - are satisfied that the proposal will have a negligible impact on the A8(T) and are satisfied that no further assessment of potential environmental effects associated with increased traffic is required for trunk road links. As no abnormal load movements are required, all loads will comply with construction and use regulations. The Transport Statement and CTMP are considered satisfactory, and Transport Scotland have no objection to the proposal based on predicted environmental impacts on the trunk road network.

National Air Traffic Control (NATS) - have no safeguarding objections to the proposal.

Kilmacolm Civic Trust – raise an objection to the proposal on the following points: excessive scale; risk to nearby properties; lack of restoration and decommissioning information; lack of environmental protection; threats from toxic gases; fire risk; and soil contamination.

Office for Nuclear Regulation (ONR) - have no comments on the proposal as the site does not lie within the consultation zone for a nuclear site.

Comments on the application from the Council's Head of Service – Roads and Transportation, the Council's Public Protection Manager and the Council's Archaeology Advisor have been received and are set out as follows.

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

- The applicant should provide tracking drawings for heavy goods vehicles entering and exiting the site.
- Tracking drawing shall also be provided to show the proposed routes to the site can accommodate HGVs passing each other on the route and that they can turn at junction on the route to and from the site.
- Access should be fully paved and 5.5m wide for the first 20 metres (to allow two vehicles to pass simultaneously).
- The visibility splay must be kept clear in perpetuity. It is noted that hedgerows may be occluding visibility.
- Parking provision is in outline only, without an indication of number of spaces and/or the volumes of potential users.
- Any access gate should be set back 10 metres from the public road.
- The retaining wall must be designed in accordance with DMRB and submitted to the Roads Service for approval, to ensure that the road network is not compromised.
- Details of the route for construction and maintenance vehicles should be provided and agreed within a detailed Traffic Management Plan.
- A Section 56 Agreement will be required for any changes to the public road network. This may require use of land out with the applicants' present control, however essential to facilitate road widening.
- A lighting plan/drawing should be provided.
- All surface water must be retained within the site.
- Risks from fluvial and surface water flooding must be identified.
- A flood risk assessment (FRA) and Surface Water Management Plan (SWMP) should be provided.

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 Health Manager.

Given the potential contaminative activities in the surrounding area (historic WW2 air defense), 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".

Archaeology Advisor - advises that the desk-based assessment provided by the applicant is broadly acceptable. Tree planting on the western, eastern and southern boundaries will reduce the visual impact on scheduled monument SM12883 (Military Battery). Although the development area has limited archaeological potential, the presence of assets cannot be discounted. The following measures are advised; provision of a Written Scheme of Investigation detailing the scope of archaeological works; trial trench evaluation to identify heritage resources; and an additional programme of archaeological works (should archaeological assets be discovered).

PUBLICITY

Applications for consent under Section 36 of the Electricity Act 1989 must be advertised by the applicant, not the Planning Authority, in accordance with the requirements of the Electricity (Applications for Consent) Regulations 1990 (as amended). The advert is to include details of how members of the public can make representations to the application to the Scottish Ministers.

The advertisements appeared in the Edinburgh Gazette and the Herald on 28th March 2025 and in the Greenock Telegraph on 25th March 2025 and 1st April 2025.

SITE NOTICES

There are no site notices required for this type of application.

PUBLIC PARTICIPATION

Applications under Section 36 of the Electricity Act 1989 are not subject to neighbour notification in the same manner as applications for planning permission.

At the time of writing, three representations (objections) have been made to Scottish Ministers:

- Strathgryffe Angling Association (2)
- Rosemary Leslie
- Andrew Leslie

ASSESSMENT

In accordance with consultation procedures, the Council requires to indicate its view on the proposal indicating whether it supports or opposes the development. The key considerations for the Council are the location of the proposed development and how the proposal relates to the Development Plan.

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 which are necessary for decarbonising the electricity supply. Battery storage can capture excess electricity produced by renewables when supply outstrips demand and releases stored energy as electricity when renewable output is slow, helping balance the system and avoiding 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.

Some of the abovementioned matters will need to be assessed by the Scottish Ministers using the various consultation responses from other agencies that have been received by them.

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 there are likely to be some due to 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 the electricity supply. 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 the 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 Policy 1 and some key elements of Policy 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.

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 the impact 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.

Consultation responses from relevant consultees have been sent to the Scottish Government Energy Consents Unit in relation to aviation and defense interests as well as telecommunication and broadcasting interests. These matters do not have to be considered by the Council for this application.

The other impacts referred to in Policy 4 of both the adopted and proposed Local Development Plans that require consideration by Inverclyde Council shall be considered elsewhere in this assessment and in conjunction with the relevant consultation responses.

In terms of the location of the site in the Green Belt, this 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. Policy 1 of the adopted and proposed Local Development Plans seeks to ensure that proposals have regard to the six qualities of successful placemaking. Whilst there are no factors specifically relating to battery storage, being "Distinctive" in reflecting urban form (expanded to "respect landscape setting and character, and urban form" in the proposed Local Development Plan) is relevant.

It has been indicated that battery storage facilities must 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.

With regards to Policy 14 of the adopted Local Development Plan, as well as Policy 15 of the proposed Local Development Plan, the proposal is for infrastructure and can be considered to have a specific locational need as such development needs to be within proximity of a viable grid connection, which is the Devol Moor Sub-Station in this instance. The proposal is therefore supportable in principle in this Green Belt location, subject to it being appropriately designed, located and landscaped. To determine the acceptability of the proposal, key impacts require to be considered. These are primarily the impact on landscape and visual amenity as well as the impact on the natural environment. These factors are assessed in more detail below.

The location of the development also must be considered under Policy 5 of National Planning Framework 4 and Policy 15 of the adopted Local Development Plan as well as Policy 16 of the proposed Local Development Plan. The fields that make up the applications site are used for grazing and are indicated as being located on land that is likely Grade 4.2 soil, which is not considered to be prime agricultural land, defined by Scotland's Soils as "Land capable of producing a narrow range of crops, primarily on grassland with short arable breaks of forage crops." Therefore, the location of the proposal is considered as acceptable under the terms of Policy 5 of National Planning Framework 4 and Policy 15 of the adopted Local Development Plan, as well as Policy 16 of the proposed Local Development Plan.

Impact on the 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 1/2/5km study area to assess the impact of the development on both the landscape and visual amenity. A Zone of Theoretical Visibility (ZTV) was prepared to assist in identifying the visual envelope that is likely to be affected by the development. The LVA appraisal includes the following viewpoints:

- Viewpoint 1: View from Devol Moor (north of substation and east of B788)
- Viewpoint 2: View from Devol Moor Road (core path)
- Viewpoint 3: View from High Mathernock (east of site)
- Viewpoint 4: View from Battery SMR (SM12883)
- Viewpoint 5: View from Auchentiber Road (adjacent consented site)
- Viewpoint 6: View from Junction of Auchentiber Road and B788
- Viewpoint 7: View from 'The Haven' retreat (B788)
- Viewpoint 8: View from Cauldside property (minor road)

With regards to 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.

The application site is located in the Rugged Upland Farmland Landscape Character Type. The key characteristics of the Rugged Upland Farmland Landscape Character Type include rocky bluffs and shallow troughs; reservoirs in flooded troughs; dominance of pastoral farming; and frequent tree cover, often emphasising landform and settlements limited to farms and villages.

The Zone of Theoretical Visibility indicates that visibility is more prevalent from the south and west. Although visibility of the development is more pronounced locally, prominent elevations to the southwest (towards Duchal Moor and Renfrewshire Heights) will experience views of the development beyond 5km. Within the Inverclyde boundary specifically, visibility from the west and south (up to 2.5km) is possible.

Viewpoint 1

This viewpoint is located to the northwest at 1.5km on an undesignated track to the immediate east of the Devol substation. Electricity transmission lines are prominent in the foreground. One of the three single turbines is visible (High Mathernock and Priestsides). The proposed (and adjacent consented) development occupies a central proportion of the view, however due to intervening topography and a lack of vertical scale in the proposed development, visual impact is minor to moderate. Combined views with the transmission lines and one operating single turbine (Priestsides) are evident, however the larger Inverclyde wind farm is only visible in sequential views. Proposed planting will screen the development further; however maximum mitigation will not be provided until planting maturity between years 5 and 15.

Viewpoint 2

This viewpoint (Devol Road) is located to the immediate north; within the Devol Upland LCNS and Core Path 37B. Views approximately 800m – 1km from the proposed site along the road/track are highly prominent and occupy a significant proportion of the view. However, much of the northern section of the track/core path (partially accessible by car, although mostly pedestrian) has no visibility of the proposed site, due to topography. Proposed planting will screen the development further; however maximum mitigation will not be provided until planting maturity between years 5 and 15. The impact is significant however not unexpected.

Viewpoint 3

This viewpoint is from High Mathernock 250m from the site boundary. The proposed (and consented Auchentiber site) occupy a significant proportion of the view and can be seen prominently in combined views with Inverclyde wind farm and the transmission lines.

Viewpoint 4

This viewpoint is located westward across the Gryffe watercourse and is situated at the High Mathernock camp and battery SMR. Views are prominent here however are likely to benefit from significant mitigation provided by landscaping.

Viewpoint 5

This viewpoint is located on Auchentiber Road, and both the proposed and consented developments adjacent to the site are prominent and occupy the extent of the view. Mitigation will largely rely on the planting regime proposed for the adjacent consented S36 Auchentiber site. Transmission lines are present in background views.

Viewpoint 6

This viewpoint is located at the junction of the A788 and Auchentiber Road. Intervening landform and vegetation mean that views of both the proposed and consented sites are largely hidden.

Viewpoint 7

This viewpoint is from the 'Haven' residential centre. The Haven has prominent foreground and background views of transmission lines and all three Priestside/High Mathernock turbines. The property has a degree of seclusion and is located around 850m from the proposed and consented BESS sites. Although both sites would theoretically occupy a significant proportion of the view from the Haven, mature existing tree cover mitigates almost all significant views towards both sites. Although tree cover can be transient, this area of woodland has remained intact for a significant number of years and decades and has a high degree of permanency. Inverclyde wind farm is only visible in sequential views (west).

Viewpoint 8

This viewpoint is from the Cauldside property, situated south of Mathernock on a minor road and southeast of the proposed site. Views of the proposed and consented sites are clear and prominent, occupying a central portion of the views alongside combined views of transmission lines and the Priestside turbines. Limited mitigation will be provided by natural screening.

Viewpoint 9

This viewpoint is from the immediate south of Auchenfoyle on the B788 (950m distant). Like 'the Haven' the mature tree cover provides a near comprehensive screening effect for the proposed development. Transmission lines are prominent and the three operational 67m single turbines are visible against a backcloth of sky.

Viewpoint 9

This viewpoint is from Cairncurran Hill (2.3km distant). Due to the elevation (277m) a panorama of the operational single turbines, transmission lines and the consented and proposed BESS developments are visible. The combined view occupies a central and significant proportion of the cumulative view however does not dominate nor is overbearing. Vertical scale is limited.

The LVA considers the undulating landform, combined with the presence of woodland and other vegetation, resulting in a range of short and medium-range views of the site from the surrounding landscape. However, short-range views are available only from local roads and Core Paths close to the site. There may be some medium-range views and potentially a long-range view from high land within the Clyde Muirshiel Regional Park to the south-west of the site. Overall, the LVA considers the visual receptors with views of the site are relatively limited in number and sensitivity.

The site is generally in a dip in the landscape and when viewed from B788 from the west the topography and areas of woodland assist in screening the site. The areas of woodland to the south of the application site also assist in screening the site when viewed from the access road to the Haven at Horsecraigs.

The fields to the north of the site on the opposite side of Auchentiber Road are more open to view although there are overhead electricity lines/pylons that run in a general north to south direction. These pylons are visually dominant structures in the landscape.



View looking east towards High Matherknock

The site is more open to view from the east when travelling along Auchentiber Road, particularly at the bend in the road at Loganwood House, as the views are across open fields with no topographical screening or woodland screening. The existing electricity pylons are in the background when the site is viewed from this direction. Further in the distance are the wind turbines at the Inverclyde wind farm at Corlic Hill. The pylons and turbines break the skyline when viewed from this direction.

There will be a change in the landscape character because of the proposed development. The magnitude of change on the landscape character will be at its greatest near the site particularly during the construction phase and until the proposed landscape buffer becomes established/matures. This magnitude of change in landscape character is not unusual for a construction project such as this.

The structures of greater vertical scale (9m) within the development will have the greatest visual impact and will present a similar visual impact to elements of the Devol Moor Sub-Station.

There is a limited number of buildings in the surrounding countryside and their positions combined with the intervening topographical screening and existing wooded areas assist in lessening the visual impact. The proposed buffer landscape planting will also lessen the visual impact as the planting matures.

In considering the visual impact, the site is relatively low lying at around 145m AOD. The proposal to cut and fill to achieve a level site will also require a retaining wall. The maximum structure height is 9m, which is not considered an excessive scale however will have degree of prominence compared to some local structures and buildings. 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.

The visualisations include mitigation provided by proposed planting which includes meadow and native woodland planting. A reasonable degree of maturity can be expected by year 5 however comprehensive maturity is not likely until year 15. The adjacent consented Auchentiber site has relevance as the visualisations for the proposed High Matherknock site include the consented Auchentiber site for cumulative assessment purposes. Screening for the proposed site relies partially on landscaping mitigation under the control of the Auchentiber consented development. The Auchentiber consent specifies a full growth maturity of 15 years. The expectation therefore is that some growth potential will occur years 1 - 5 however the full extent of landscaping mitigation will not be provided until year 15. The proposed landscape buffer as it becomes established/matures will also be viewed in the context of the wooded areas adjacent to the site and would generally be viewed as a continuation of the existing wooded areas.

Many of the effects of the proposed development are localised, and the more prominent views are generally near the site. Some of the components of the development such as the containers are structures which are utilised within agricultural settings and would not be entirely incongruous within a semi-rural area, although rarely experienced on this scale. The adjacent residential properties in the study area would have a view of the development, although topography and screening would mitigate those impacts.

There is a significant visual impact from sections of the core path 37B. This is not entirely transient in nature however equally, does not impact the entirety of the route. Users of the core path will experience prominent views for around 800-1000m of the route. These short to medium distance views largely disappear at points closer to Port Glasgow. Views from the west (Mathernock and Cauldside) are prominent and include combined views with transmission lines, the three operational Priestside/Mathernock turbines and the Inverclyde wind farm. Mitigation of views at these locations rely significantly on planting that will mature around 5-15 years. However, the Cauldside property also has local tree cover and vegetation around the property perimeter to further mitigate effects.

Views travelling west to east on Auchentiber Road also rely on the mitigating effects of proposed landscaping and planting. Furthermore, the proposed Mathernock site will partially rely on implementation of landscaping specified in the Auchentiber BESS consent. The proposed development is therefore not considered to have a wider or significant visual impact. It is considered that the proposed landscape buffer is necessary as mitigation to assist in screening views of the site/development immediately adjacent to the site on Auchentiber Road. Although the visual impact of the proposal is localised, without the proposed landscape buffer the visual impact of the development would be locally significant and uncompromising. It should be noted that the maturity period for the planting is substantive enough that the development will be relatively prominent from some viewpoints for several years.

The visual impact of the proposed development is acceptable. Some longer distance views of the development are possible, however the development would appear as a minor-moderate component of the wider landscape. At distance, the horizontal and vertical scale of the development would not

appear visually overbearing. Although visible, the development would not be a primary, isolated focus for the viewer, and would reside within a landscape with different and varying focal points.

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 Section 36 consent be granted the installation and maintenance of acoustic fencing will have a secondary purpose of providing further screening of the development.



View looking west towards Inverclyde Wind Farm

The proposed development does not break skylines and is far enough away from the Muirshiel Regional Park to not have a significant visual impact on the park.

It is considered that the visual impact of the proposal, when combined with the proposed landscape buffer is acceptable in order to accord with Policy 8 of the National Planning Framework 4 and Policy 14 of the adopted Local Development Plan as well as Policy 15 of the proposed Local Development Plan.

Cumulative Impacts

The Rugged Upland Farmland landscape character designation is semi-rural in nature and incorporates individual residential properties, farm holdings and agricultural business premises. The composition of the area has developed over time to include electricity infrastructure (substation and transmission lines) and an operational wind farm (Inverclyde).

The landscape character is described as being host to reservoirs, pastoral farming, frequent tree cover, defensive mottes and hillforts and small settlements or individual farmsteads. Areas relatively close to urban fringes (the proposed development is 2km from Port Glasgow and 2.7km from

Kilmacolm) often incorporate a variety of secondary land uses, including electricity infrastructure, waste recycling or wastewater management, which are often located close to the boundaries of settlements for operational reasons.

However, in assessing cumulative landscape impact, several factors require to be considered. A cumulative landscape impact can either be a cumulative impact on the physical fabric (i.e. two or more developments affecting key landscape components) or two or more features in the landscape changing the landscape character to such an extent that a different landscape character emerges.

Areas of urban fringe have become associated with some level of industrialisation, particularly electricity distribution and management and waste recycling installations. More recent developments have included renewable developments, such as wind turbines and increasingly battery energy storage and gasification plant. Although there are technical requirements for proximity to associated infrastructure, this requirement must be balanced against the impacts on landscape character.

NPF4 Policy 11 states: *“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;”*

However, the key test of whether the impacts are generally localised and acceptable relates to whether the cumulative impacts from two developments (consented Auchentiber and the proposed High Mathernock BESS) result in this type of industrial development being a recognised and consistent feature of the landscape, or that such developments result in a fragmentation of the landscape. An assessment should also be made of whether the cumulative developments are a visual distraction from the landscape, or a distraction from key features of the landscape.

The local and intermediate landscape has evolved to include significant industrial features such as the electricity substation, electricity transmission lines, the operational Inverclyde wind farm (1.8km north west of the High Mathernock BESS) and single turbines (in particular the two operational turbines at Priestside and single operational turbine at High Mathernock; all 76m in height at distances of 500m to 750m from the proposed BESS site).

BESS developments have a limited vertical scale (in the case of the consented and proposed developments the maximum structure height is 12m), however the land take associated with the combined Auchentiber and High Mathernock developments extends to 24.87ha. This is a considerable change to the composition of land use. Although recent developments have introduced an industrial element to the landscape, the long-established profile of the LCT (Rugged Upland Farmland) has remained predominantly (however not exclusively) agricultural with small settlements and individual dwellings alongside rural businesses.

The cumulative landscape effect of two BESS developments with a combined development area of 24.87Ha exceeds what would be considered a definition of generally acceptable. The immediate area (approximately contained by the B788 to the south and west, the southern periphery of Port Glasgow at Devol Road to the north and Blacksholm Road to the east) is significantly adversely impacted as the local landscape would be characterised by industrial development that is a consistent and recognised feature. The proposed development is also considered to have a cumulative landscape impact in association with the operational turbines at High Mathernock and Priestside, the operational wind farm (Inverclyde) and electricity transmission lines.

The cumulative landscape impact extends beyond a local impact to an impact on intermediate landscape. The operational wind farm, single 67m turbines and transmission lines are present in a number of combined views with the consented and proposed BESS developments. It is considered that the cumulative developments are a visual distraction from the landscape itself, and that there is a notable change to the visual character of the landscape as perceived from a distance. The extent of the combined developments is considered to have an impact over a larger geographical area than would normally be considered entirely local.

The combined effect of the BESS, electricity infrastructure and other renewable developments fragments the rural nature of the landscape, and the local and intermediate landscape is altered to a degree considered to constitute a negative change to the landscape character.

Ecology and Habitats

There are no nature heritage designations that affect the application site. There is a Local Nature Conservation Site (Devon Road Upland) across Auchentiber Road and to the north of the site that relates to a mosaic of wet heathland and acid grass with local areas of dry heath, bracken and gorse scrub. As the application site is used for grazing, it is considered to have limited ecological value. Any habitats are likely to be around the margins of the site where the existing wooded areas and watercourses are located.

The Survey Report submitted with the application indicates otters were found to be active around the site, due to the presence of otter spraints (faeces), the Survey Report concludes that given the level of protection afforded to otters, best practice measures for the construction phase of the development have been recommended. These includes pre-construction surveys; interceptor traps; 50m buffers around watercourses (chemical storage); covering of trenches; dispersal of lighting and machinery, avoidance of dawn/dusk working practices.

The Survey Report indicates a lack of potential roost features for bats (around with a 50m buffer of the site). However, the site does offer suitable conditions for foraging or commuting bats. The potential creation of hedgerows, woodland, grassland and meadow would enhance potential habitats. Suitable mitigation is proposed including surveys, bat boxes, lighting strategies and use of an ECoW.

The Survey Report also indicates no active badger sets were found within 100m of the site, although badgers were thought likely to use the landscape around the site for foraging and/or commuting and concludes no further actions in relation to badgers are needed at this time. Although suitable habitat for water vole is present, no evidence of the species has been discovered.

The proposed landscape buffer also presents the opportunity to create new/additional habitats and in turn to enhance biodiversity in order to accord with Policy 3(a) of National Planning Framework 4.

Impact on the Roads Network

The proposed development is located adjacent to a minor road that has a limited volume of traffic flow. The main impact on the roads network will be during the construction of the development and the submitted Transport Statement indicates that all vehicle trips associated with construction traffic will arrive at and depart from the site using the B788 Auchentiber Road to the west. A Construction Traffic Management Plan (CTMP) is indicated as being prepared. The choice of route is informed by the presence of a bridge and other road restrictions from the west. Decommissioning is likely to be a reversal of the construction phase.

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 one vehicle 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. Public access to the site will be restricted for safety and operational reasons. Access to the Core Paths (29b and 37b) are not restricted by the development, however, may experience a degree of impact during the construction phase.

The Head of Service - Roads and Transportation has not raised any concerns about the general impact of construction traffic on the local roads network nor when the development is operational. A Traffic Management Plan will be required to be submitted for further written approval.

Transport Scotland have advised that they are satisfied that the proposal has a negligible impact on the A8 trunk roads.

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.

Core Paths

Although there is a degree of visual and landscape impact from both Core Paths (29b and 37b) to the north and east of the site, this does not automatically result in an unacceptable impact. The section of core path impacted is limited in length and therefore relatively short in effect duration, and the impacts are further mitigated by proposed planting and screening. Views from the core path(s) towards the proposed development will also be influenced by other existing elements of the built environment. A core path is often experienced across substantial parts of the whole route length. Using a core path for recreation will involve a progressive variation in the visual experience of the user. It would be expected to see landscape changes which may involve developments that could be industrial to some extent. This may include electricity infrastructure such as substations and transmission lines.

Regarding access for users of the core paths, operation of the development will only require minor vehicle movements and occasional site access. Construction of the development will require more extensive use of the public road, although this will be limited to the 18-month construction period. It is accepted that some disruption to Core Path 29b is inevitable for a temporary period. This is not a permanent change to the use of the core path and the long-term use is not affected.

On this basis, the core paths are not considered to be unacceptably impacted by the proposed development. No tourism assets at a further distance than the core path are impacted to any notable degree due to both separation distance and the relatively modest scale of the development. The 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.

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

The Gryffe Water runs along the south boundary of the application site. A further tributary of the Gryffe flows north to south around the periphery of the site. SEPA flood risk mapping does indicate that areas to the southern periphery of the site have a high likelihood of river (fluvial) flooding. A number of drainage channels throughout the site have a high likelihood of small watercourse and surface water flooding, with a significant risk of flooding around the periphery of the site from the tributary watercourse.

A Flood Risk Assessment has been submitted and concludes that the proposal is not at risk of flooding, as the components of the proposed development are to be situated relatively distant from the Gryffe Water.

The Flood Risk Assessment also concludes that the proposed development is not predicted to increase surface water runoff or flooding to the surrounding catchment as the use of a SUDS basin (2400m³ volume attenuation) and permeable access roads and hardstanding are to be implemented.

SEPA have indicated they have no objection to the proposal in their consultation response to the Scottish Ministers. The Head of Service - Roads and Transportation - advises that there are areas of land at risk of fluvial and surface water flooding within the site and suggests that all surface water should be managed within the site. A Flood Risk Assessment and Surface Water Management Plan should be provided.

In summary, there are fluvial and surface water flood risks around the site area. However, the submission indicates that the development area itself is positioned north within the site and generally focused away from the Gryffe watercourse to the south. The applicant has provided a robust assessment of risk and mitigation measures such as permeable surfaces and provisions of an attenuation pond will provide a further reduction in flood risk. The topography of the site is favorable as surface water is not likely to accumulate towards the area of development. It should also be noted that the provision of essential infrastructure (such as renewable energy) in areas of potential flood risk is supported within NPF4.

It is therefore considered that the potential flood risk is acceptable, and the proposal accords with the terms of Policy 22 of National Planning Framework 4 and Policy 8 of the adopted Local Development Plan as well as Policy 9 of the proposed Local Development Plan. The final details of the proposed surface water drainage would need to be submitted for further approval in writing, if consented.

Cultural Assets and Archaeology

There are no scheduled monuments within the application site and the proposed development is within the vicinity of the two scheduled monuments at Pennytersal Farm Motte (1400m east) and High Matherknock Battery 135m southeast of the site.

There is a noted absence of some historic environment assets such as conservation areas, listed buildings and designed gardens and landscapes, none of which are in the vicinity of the proposed development. Duchal House is a Garden and Designed Landscape 4km to the southeast of the site. Clusters of listed buildings are located approximately 3-4 km distant to the north and southeast (Port Glasgow and Kilmacolm respectively). It is considered that the distance from listed buildings and conservation areas is sufficient to ensure that there are no unacceptable impacts on their settings.

As advised in the consultation response from Historic Environment Scotland, the proposed development whilst visible would not break the skyline or impede views from the battery or command post at High Matherknock. It is agreed by Historic Environment Scotland that any impact on the setting of this scheduled monument would not be nationally significant. Further mitigation would be provided by appropriate landscaping, which should screen much of the site from the battery SMR.

An independent Archaeological Assessment was sought by the Council. The report and conclusions largely concurred with the applicant's desk-based assessment and comments of HES (Historic Environment Scotland). Tree planting would screen much of the visual impact from SMR12883. Although unknown buried assets are unlikely, the assessment concluded that a written scheme of investigation, trial trenches and if necessary, fieldwork should be a condition of any subsequent consent.

In summary, the surrounding area is not likely to have accommodated significant human settlement until relatively recently. Buried assets are unlikely and the closest SMR (Mathernock Battery) would not be adversely impacted providing reasonable screening is provided as part of the site development.

The proposed development is not considered to have a significant impact on the setting of the nearby scheduled monuments and is therefore considered to accord with Policy 7 h) of NPF4 and Policy 31 of both the adopted and proposed Inverclyde Local Development Plans.

Noise Impact

A Noise Impact Assessment (complying with BS 4142) has been submitted with the application to quantify the predicted level of noise, upon the closest residential dwellings to the site, from the various mechanical and electrical plant which form part of the development.

The Assessment concludes that the rated level of noise generated by the development falls below the typical daytime background sound level. For the night-time period, the calculated internal noise levels fall below the night-time noise criteria limit for bedrooms and as such, there is no requirement to consider noise mitigation measures.

There is one property with a financial interest in the development (Loganwood). Guidance in this respect indicates that consideration should be given to allowing a higher tolerance of noise impacts on properties that are financially involved in a proposed development. Acoustic fencing is proposed around the development perimeter.

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.

Private water supplies

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.

A condition should be added to any consent to require a pre-commencement Water Supply Management Plan to safeguard and maintain satisfactory private water supplies. This should include mitigation and resolution during construction, operation and decommissioning phases and incorporate testing and provision of alternative safe water supplies in the event of contamination.

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 which accounts for a cumulative worst-case scenario (i.e. simultaneous explosion and fire event at the proposed site and the adjacent consented Auchentiber site). Although short term and limited occupational exposure to pollutants is possible, no significant health impacts are expected. A Fire Action Plan is also included, which assesses a maximum risk scenario, and which accounts for wind drift. Fire risk from BESS itself 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.

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, including ancillary infrastructure, and site restoration.

The applicant has indicated that the intended lifetime of the proposal is 40 years after which the facility will be decommissioned and the land restored to its former state.

The applicant has provided limited information other than to state that decommissioning would comply with all relevant legislation at the time and the Planning Authority would be contacted prior to any commencement.

Notwithstanding, given the type of development, its size and 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 on any permission the Scottish Ministers may grant to address decommissioning and restoration of the site including the requirement for a financial bond to ensure sufficient funds are available to de-commission 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 planning condition.

Overall Conclusion

It is acknowledged that the development is to be in the Green Belt and the site is relatively substantial in scale. The proposal represents a degree of change at this location, however this must 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 an entirely remote rural location and there are other forms of industrial infrastructure and energy development in the surrounding landscape. The wind farm at Corlic Hill and the electricity pylons are the visually dominant structures in the surrounding landscape. The proposed site is 1.7km from the Devol Moor sub-station and 1.8km from the wind farm and within a reasonable distance of Port Glasgow, therefore the requirement for the site to be accessible would be met.

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. Although there are significant benefits that the proposal will bring in terms of net economic benefit and contributing to energy storage, the established character of the LCT (Rugged Upland Farmland) has remained largely agricultural with minor settlements and is generally sparsely populated.

The cumulative landscape impact is considered unacceptable. The local landscape would be altered to an extent that industrial development (including renewable energy and electricity transmission infrastructure) would be a consistent and recognised feature. The proposed development would have an unacceptable cumulative landscape impact in association with the operational turbines at High Mathernock and Priestside, Inverclyde wind farm and electricity transmission lines. The cumulative landscape impact extends beyond a local impact to an impact on intermediate landscape. Cumulative landscape impacts are such that a visual distraction from the landscape itself is notable.

The combined effect of the BESS, electricity infrastructure and other renewable developments fragments the rural nature of the landscape, whereby the local and intermediate landscape would be altered to a degree which constitutes an unacceptable alteration to the character of the landscape.

Overall, the benefits of the proposed development are not considered to outweigh the adverse impacts. The proposal is therefore considered to be unacceptable 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.

RECOMMENDATION

It is recommended that the response to the Scottish Ministers is that Inverclyde Council object to the proposed development for the following reasons:

1. The proposed battery energy storage system (BESS) fails to accord with Policy 11 (e) (ii) of NPF4 as the cumulative landscape impact is incompatible with the established landscape character. The proposal also fails to comply with Policy 14 of NPF4 as the development undermines the interpretation of local landscape due to negative cumulative landscape impact.
2. The proposed battery energy storage system (BESS) fails to accord with Policies 1 and 4 of both the adopted and proposed Local Development Plan due to adverse impacts on local landscape character and setting, and the green network. The proposal also fails to comply with Policy 34 of the proposed Local Development Plan as the proposal fails to conserve, enhance or restore landscape character and distinctiveness.

Neale McIlvanney
Interim Director -
Regeneration

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