Scott Hobbs Planning

Planning Statement on behalf of:

Scott Stability Ltd

Date:

30 November 2022

Non Technical Summary

Proposed BESS, Land at Camsiscan Farm, Craigie, Kilmarnock South, South Ayrshire

Typical Illustration

Info

Proposed 350 MW BESS and associated infrastructure:

Land at Camsiscan Farm, Craigie, Kilmarnock South, KA1 5JT

Summary

Scott Stability Ltd, a subsidiary of Noriker Power Ltd is proposing a 350MW battery storage facility (BESS), with associated infrastructure and development. Following due process, including pre-application consultation and submission of an EIA Screening request, the application is submitted to the ECU of the Scottish Government for consent and deemed planning permission. South Ayrshire Council has determined that an EIA is not required on the basis that it is unlikely to result in effects on the environment which are sufficiently significant to require the submission of an environmental assessment. The ECU formal Screening Opinion is awaited. The site is located within the countryside, but lies outside any specifically designated site in terms of heritage and the environment (landscape, visual and ecological). It is lower grade agricultural land and lies at a relative distance from sensitive receptors such as residential dwellings. Policies in the Revised NPF4 and the SALDP support the proposed development. The application is supported by a number of assessments which consider the merits of the proposal in relation to relevant material considerations, and which conclude, subject to mitigation, which is proposed as part of the application, that the development will not cause any significant adverse impact to matters which should be protected. Accordingly, the proposed development is consistent with the NPF4 and SALDP. There is a clear need for facilities for the storage of energy and the proposal meets the national focus to improve renewable energy provision.

Contents

1.0 Introduction

1.1 This Non Technical Summary (NTS) is submitted on behalf of Scot Stability Limited ('the Applicant') and relates to an application for consent under S36 of the Electricity Act 1989 ('the application') and also comprises a request that Scottish Ministers give a direction under section 57(2) of the Town and Country Planning (Scotland) Act 1997 that planning permission for the development be deemed to be granted.

1.2 The application comprises land to the north of Camsiscan Farm, Craigie, Kilmarnock South, South Ayrshire, KA1 5JT (the site).

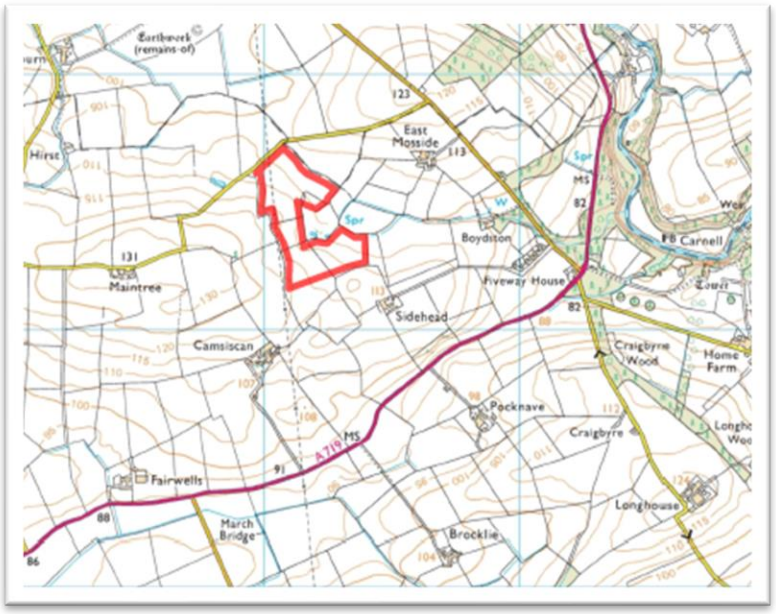

Figure 1 : Site Location – Extract of Location Plan

1.3 The description of the proposed development which is the subject of this application is as follows:

'*Construction and operation of a 350MW Battery Energy Storage System (BESS) with associated infrastructure including access roads, sub-station buildings and supporting equipment, drainage and ponds, fencing and landscaping.*'

1.4 This Planning Statement is part of a suite of documents submitted with the application, as outlined below. These supporting documents are in addition to the formal application documents comprising the accompanying plans, sections, and elevations. The full suite of supporting documents is as follows:

- Planning Statement
- Pre-Application Consultation Report (PACR)
- Non-Technical Summary (NTS)
- Design and Access Statement (DS)
- CONFIDENTIAL Ecology Report

- Heritage Report
- Topographical report
- Transport Report
- LVIA and Landscape Strategy
- Noise Assessment
- Air Quality Impact Assessment and Sustainability Statement
- Drainage Impact Assessment and Strategy
- Ground Investigation Report
- Topographical Survey

1.5 The Applicant has carried out a thorough site finding, site sifting and design process to reach the most appropriate form of BESS development. Design revisions have included structure height, location, landscaping options, boundary and other enclosure treatment and siting for HV switch gear.

1.6 The suite of application documents illustrates the manner within which the proposals have evolved to address issues raised, acknowledging that not all issues can or should be addressed.

1.7 The application documentation and plans consider and assess the proposal in relation to matters referred to in Schedule 9 to the Electricity Act, to development plan and policy guidance and to consideration of material matters.

1.8 A Screening request has been submitted for the formal Opinion of the Scottish ministers whether the development is one which required environmental impact assessment under The Electricity Works Environmental Impact Assessment (Scotland) Regulations 2017. South Ayrshire Council, as a statutory consultee, has determined (regarding land within its remit) that the proposed development is unlikely to result in effects on the environment which are sufficiently significant to require a formal environmental assessment of the proposed development. The opinion of the Scottish Ministers is awaited.

The Applicant

1.9 The Applicant is part of the Noriker Power Ltd group which was established in June 2015 with the intent to build and operated a portfolio of energy assets, develop projects from origination through to delivery grid services and trade on the power markets.

1.10 During the past 7 years, the Applicant has developed and built over 250MW of large-scale battery and hybrid facilities in support of a renewable grid and is the first fully commercial large-scale battery project developer in the UK to both enter dynamic FFR contracts with National Grid and to build and commission the sites for those contracts.

1.11 As of 2022 the Applicant has eight sites in commission. Their UK-wide projects currently exceed 250 MW, with sites ranging from 5MW to 50MW. The Applicant's first Scottish site (Byers Brae) was commissioned in March 2021 using an innovative approach to deliver a 30 MW facility.

1.12 The Applicant has a contract to connect to the grid and deliver 350MW within the general location of this subject site by 2025, which will help achieve the aims of national UK and Scottish governments relating to renewable energy. The prospective Applicant, therefore, is well placed and experienced to deliver the BESS facility at this site.

2.0 *The Proposal*

2.1 This proposal seeks to meet the requirements of the contract that the Applicant has with the National Grid for the erection of a 350MW storage facility in this general location. The proposal consists of :

- a BESS with a capacity of 350MW
- some 392 battery containers with apparatus placed within that compound, at 3-4m single height, finished in colour to specification to be agreed pursuant to conditions
- the containers will be laid out in sections with 16 containers in each section. There will be between two and four sections contained within a total of nine terraces. The southern section of the site will comprise 5 terraces, there will be one linking terrace centrally within the site leading to three terraces to the north of the site.
- There will be two inverters and two transformers at the end of each section and each terrace will be provided with short access track – for accessibility and maintenance
- A 400KV HV Switch gear apparatus will be provided at the north of the site, accommodating the infrastructure to meet National Grid Energy Network's requirements and which will comprise a Plug and Switch System (62m in length and width variable but no more than 27.2m) and an Air Insulated Switch System (120.81m in length and width no more than 14.79m in width). The apparatus will vary in height up to 11.52m.
- There will be six groups of back-up generator, auxiliary transformer, LV and control container and switchgear container distributed within the site
- A large SUDs Pond / reservoir will be provided towards the southwest of the site, with a water pump room / value room located adjacent.
- Water channel runs will be provided around each terrace and additional catchment ponds will be created downstream to collect water for pumping back to SuDs pond
- industrial style green or close boarded timber security and acoustic fencing up to 4m in height around the site
- access to the site will be provided from the gates to the north from the unnamed road

Figure 2 : Typical Layout – Extract of Site Layout Plan

2.2 An underground route will be provided from the BESS facility to the Kilmarnock South substation by National Grid. It is understood this route will be provided along the public highway.

2.3 An area of land will be maintained adjacent to the site as a habitat improvement area.

2.4 Approximately 100 jobs will be created during the construction of the project, and as far as possible, attempt will be made to source some jobs locally. It is also intended to source construction materials locally, as far as is practical, both to reduce costs and transportation. During the operational phase, the nature of the BESS development is one of high energy generation but low employment generation. It will largely be an unmanned site in terms of physical presence with 3-4 permanent positions created to look after the site, mainly in groundworks and landscape maintenance.

3.0 The Site and Surroundings

3.1 The application site covers an area of approximately 13.45 hectares and lies within the Craigie area of South Ayrshire council administrative boundaries. The site lies to the south of Kilmarnock and some 1.7 km from the existing substation at Kilmarnock South. The site lies to the north of the A719 and immediately south of the unnamed Road between East Mosside and Maintree properties.

3.2 It comprises four primarily agricultural fields associated with the existing farm complex of Camsiscan Farm. It lies to the north of that farm complex and to the west of East Mosside.

3.3 Primarily, the site is an area of gently undulating area of land of relatively small field pattern with sporadic landscaping. The field almost encircled by the site on 3 sides is more ecologically diverse containing additional vegetation.

3.4 Major overhead electricity lines bisect the site running in a north – south direction towards the western side of the site.

4.0 Policy and Assessment

4.1 There is national and local policy and guidance relative to the proposed BESS development and this general area, and which is assessed below.

NPF4

4.2 The Revised National Planning Framework 4 (R-NPF4) was presented to Parliament on 8 November 2022, following previous consultation and committee scrutiny, by the Minister for Public Finance, Planning and Community Wealth.

4.3 When adopted, NPF4 will form part of the statutory development plan relevant to the consideration of this development proposal, and subject to due procedure, will carry significant weight. Until adopted, it is of material weight and is the most recent statement from the Scottish Government relating to development proposals

4.4 The delivery of renewable energy to achieve net zero is given significant importance in the R-NPF4, which designated as one (no 3) of the 18 National Developments. National developments are stated as being '*significant developments of national importance that will help to deliver our spatial strategy*'.

4.5 National Development 3 – 'Strategic Renewable Electricity Generation and Transmission Infrastructure' seek to *supports electricity generation and associated grid infrastructure throughout Scotland, providing employment and opportunities for community benefit, helping to reduce emissions and improve security of supply.'*

4.6 This National Development is identified as one which will lend support to the delivery of the spatial strategy for a strong Central area to Scotland and towards the revitalisation of rural areas. It seeks to deliver a sustainable Central area, supporting net zero energy solution and improving energy efficiency. The proposed BESS will facilitate such delivery.

4.7 National Development 3 is recognised as being important to support '*renewable electricity generation, repowering, and expansion of the electricity grid…… A large and rapid increase in electricity generation from renewable sources will be essential for Scotland to meet its net zero emissions targets. Certain types of renewable electricity generation will also be required, which will include energy storage technology and capacity, to provide the vital services, including flexible response, that a zero-carbon network will require. …… This has the potential to support jobs and business investment, with wider economic benefits…. The electricity transmission grid will need substantial reinforcement including the addition of new infrastructure to connect and transmit the output…… Need : Additional electricity generation from renewables and electricity transmission capacity of scale is fundamental to achieving a net zero economy and supports improved network resilience in rural and island areas'*

4.8 At 350MW, this proposed BESS is a National Development and in principle is supporting the aims of the R-NPF4 and associated Strategies to achieve net zero emissions targets and a stable energy supply.

4.9 R-NPF4 contains a number of policies relevant to the proposal, particularly Policy 11 – Energy. This policy seeks to '*encourage, promote, and facilitate all forms of renewable energy development onshore and offshore. This includes energy generation, storage, new and replacement transmission, and distribution infrastructure…*' R-NPF4 states that '*significant weight will be placed on the contribution of the proposal to renewable energy generation targets and on greenhouse gas emissions reduction targets*' when balancing potentially conflicting materials interests.

4.10 R_NPF4, therefore, fully supports the development. Policy 11a)iii specifically refers to '*energy storage, such as battery storage and pumped storage hydro*;'. As require by 11c), the proposal will be positive in terms of local socio economic benefits in terms of employment and supply chain opportunities, and in contributing to a stable supply of energy for businesses and residents alike. As required by 11e), mitigation is proposed to ensure that there is no unacceptable impact upon any other material consideration that otherwise would outweigh the benefits of the proposal and the contribution to renewable energy and net zero emissions.

4.11 The proposal is supported by other policies, with which the proposal complied with requirements, as demonstrated in the supporting documentation, for example Policy 1 - Tackling the climate and nature crises; Policy 2 – Climate mitigation and adaptation; Policy 3 – Biodiversity – supports development which protects biodiversity and develops positive results; Policy 5 – Soils; Policy 6 – Forestry, Woodlands, and Trees; Policy 23 – Health and safety – this policy seeks to not support development which is likely to have signficiant adverse effects on air quality (23d) and unacceptable noise impacts (23e) and Policy 29 Rural Development. .

NPF3 and Scottish Planning Policy

4.12 Both documents will be superseded when the NPF4 is adopted so carry less weight at this time. Both support the proposed development in relating to reducing greenhouse gas emissions and improving storage capabilities and capacity, all in accordance with a presumption in favour of sustainable development, of which the relevant principles are :

South Ayrshire Local Development Plan 2022

4.13 SAC formally adopted its Local Development Plan 2 (SALDP) in August 2022, and which is, therefore, an up-to-date plan and comprises the development plan against which development proposals are assessed. SALDP sets out the development strategy, key policies and proposals to guide development in South Ayrshire to 2032.

4.14 The development wholly lies in SAC administrative area, and on the boundary with East Ayrshire. The extant and emerging East Ayrshire Local Development Plans also contain policies relevant to the proposal, were it in its district area. Those policies are similar in spirit to the policies of SALDP.

4.15 The policies seek to direct development to brownfield sites before greenfield where possible, but allow for exceptions if a site-specific or economic benefit can be identified. They seek to improve infrastructure; support sustainable development; promote the sustainable use of natural, built and cultural resources; maintain and improve the landscape and features and protect important ecological interests; protect prime agricultural land; protect residential amenity; and, keep negative road and traffic impacts to a minimum

4.16 Specifically, LDP Policy Renewable Energy support proposals for generating and using renewable energy in stand-alone locations if there will be no significant harmful effects on residential amenity, the appearance of the area and landscape character, biodiversity, historic environment, and cultural heritage. The supporting documents assess the proposal and demonstrate compliance with the policies.

4.17 The assessments demonstrate that the development is in accordance with national and local policy.

5.0 Assessment of Development

5.1 In regards to the specific matters relating to the proposed development, the application documents demonstrate the following :

Principle of and Need for Development

5.2 The subject site lies within the countryside, outside any settlement limit and with no other particular planning designation.

5.3 The need for the development is justified by national policy. Additionally, the Applicant has a license to connect to the grid for the 350MW supply which demonstrates the National Grid's requirement for additional infrastructure. It also demonstrates that the facility will be provided and will contribute to the delivery of NPF4 National Development 3 from 2025. The DS identifies the Applicants approach to site selection and demonstrates the justification for this application site.

5.4 The proposed site is justified on the basis of :

- within the vicinity of and of sufficient size to accommodate and deliver the license requirement and available for use within the required development timescale of 2024.
- in an 'unsensitive' area, as defined in The Electricity Works (Environmental Impact Assessment) (Scotland) Regulations 2017 – i.e., not identified as an SSSI, nature conservation area, European site, World Heritage Site, scheduled monument, national scenic area, national park or marine protected area
- without constraint by virtue of existing infrastructure
- accessible to the substation but which would not result in cumulative harmful development
- separate from adjacent residential properties, to protect residential amenity (particularly noise and visual)
- with access to the road network without causing significant highway safety issues during construction
- with an ability to provide sufficient water to resolve any emergency issue relating to fire and which does not cause an on-going fire risk to land, trees or habitats outside the subject site / equipment.

Landscape and Visual Amenity

5.5 The Landscape and Visual Impact Assessment has reviewed the existing landscape and visual resource of the site and surroundings. It forms part of the agricultural lowland landscape in South Ayrshire, which is an extensive tract of land extending from Ayr, around the southern edge of Kilmarnock into East Ayrshire and is an undulating pastoral landscape.

5.6 The site contributes positively to the local landscape character as it is representative of the local landscape, including the agricultural use (pastoral grassland) and gappy native field boundaries. The built elements (overhead wires and pylons, and small turbines) temper character to a very limited degree. The elements that form the surrounding farmsteads are of variable style, but they nevertheless contribute to the rural integrity and character of farm groups within the landscape pattern; overall, these elements are recognisable features in the landscape and only occasionally integrated by the structural planting and use of varied colours, in an otherwise open landscape.

5.7 The proposals will result in a direct change from one of agriculture to one of infrastructure resource but such change is in an area where the infrastructure can be accommodated. The development, therefore, will represent a slight degree of change on a relatively small part of the LCA and which will be mitigated with significant new planting to reinforce the landscape structure and provide softening of the battery energy storage facility and integrate it better into the landscape.

5.8 Overall, the scale and degree of change on the agricultural lowlands of Ayrshire as a whole would be very limited and the significance of the landscape has been assessed to represent a Slight Adverse Effect in the short term. Once an appropriate landscape management scheme has established the significance of the landscape effects in the longer term will change to represent a Negligible Effect to the landscape resource and landscape character.

5.9 The significance of the visual effects is relatively limited due to the location within an undulating and incised landform in an otherwise open agricultural lowland, and form a series of localised views seen principally from the local road network over existing hedges, stone wall field boundaries. There would be no view from within the Carnell or Dallars House Estates which are both located in a steep sided and wooded valley; although there may be glimpses from surrounding local roads beyond the estates.

5.10 Apart from the most noticeable effect which will be experienced along the Site frontage, more so to the east, the visual effects range from generally Moderate to Slight Adverse and Negligible Effect, although it has been assessed that users of a short section of the roadside (on the northern boundary of the Site) will experience the most apparent effect on views and visual amenity both during construction and immediately following implementation when drivers, cyclists and walkers are particularly close to the Site, albeit seen in the context of an area which has many other agricultural buildings; however, the effects will reduce with distance and for some views the effects will be short lived, largely because they occur on transient. As such, the change experienced is not always the focus of the view.

Nature – Ecology, Habitat

5.11 The majority of the habitats which will be lost to the development are of low conservation concern. Poor semi-improved grassland, improved grassland and arable fields provide little ecological value and are unlikely to pose a constraint to the development. Small areas of broadleaved woodland and scattered scrub are located within and immediately adjacent to the site. That land will be retained and enhanced as part of the Applicant's commitment to biodiversity and additional planting will be carried out to attract a wider variety of protected species and invertebrates, to increase foraging and commuting opportunities for bat species and to provides suitable habitat for nesting birds and protected species. A Habitat Management Plan will be created by an appropriately qualified ecologist, to ensure that the biodiversity of the area is maintained and managed appropriately.

5.12 An active main badger sett has been identified in close proximity to the site and further surveys will be required prior to development commencing and a NatureScot licence application may be required to allow for the legal disturbance (or destruction) of the sett. A Badger Protection Plan will be produced to detail specific mitigation measures to minimise any potential impact on badger.

5.13 There are ash trees in close proximity to the site with 'low' and 'moderate' bat roosting potential bat roost potential. The trees lie within the area proposed for biodiversity enhancement and accordingly the bat potential will not be disturbed.

5.14 It is highly probable that birds may nest within the site and surrounding area. The biodiversity improvements proposed for the site partially encompassed by the site will improve such habitat, all as to be described in a Habitat Management Plan, which will provide suitable nesting and foraging opportunities for bird species of conservation importance.

Soils and Agricultural Land

5.15 The underlying natural soils comprised glacial till of sandy slightly gravelly or gravelly clay and are expected to provide sufficient bearing capacities necessary to support lightly loading structures.

5.16 The site comprises approximately 13.45 hectares of primarily grade 4.1 agricultural land. It is not, therefore, prime agricultural land and whilst being in such use is relatively low in output and productivity value and is used primarily for grazing purposes and animal feed crops. The site forms part of a wider agricultural land holding and the loss of this area is not significant to agriculture in this area.

Decommissioning

5.17 The site will be fully decommissioned at the end of its operational life and the land will be restored and returned to its former grazing and winter barely crop agricultural use, in accordance with the 25 +10+10 years the Applicant has agreed with the landowner.

5.18 Decommissioning plans can be agreed towards the end of the life span of this proposed development.

Cultural Heritage

5.19 There is overall a Low potential for prehistoric, Roman, early medieval, medieval, post-medieval and modern remains to survive within the Site, which has remained undeveloped from the prehistoric to modern period with the exception of Mosside (Asset 13) located in the central area. Although the building associated with Mosside is no longer visible above ground, there is a possibility for remains to survive below ground level and to be impacted during ground-breaking works. Mosside is considered to be of Low importance although the development impacts could be of High magnitude as they could result in the removal or destruction of any surviving buried remains. In order to identify and mitigate any impacts upon hitherto unknown buried archaeological remains on site, it is considered that an archaeological programme of works be required prior to construction work.

5.20 There are 11 Listed Buildings within a 2km area: nine Category B Listed Buildings and two Category C Listed Buildings. Due to undulating topography and intervening vegetation, there is unlikely to be any intervisibility between the development and any building, other than Craigie (Asset 17), which is located 970m to the west of the Site. The setting of this asset relates more to its relationship with other farm buildings and the immediate surrounding agricultural land. A Negligible magnitude impact is expected.

5.21 There will be no intervisibility between the Site and the Inventory Garden and Designed Landscape of Carnell (Asset 7), due to undulating topography and large amounts of intervening vegetation and given the distance and location of the Non-Statutory Registered: V earthwork known as Riccarton 800m north-east of the Site (Asset 1) there would by no material alteration to its setting and impact would be Negligible.

Noise

5.22 The facility will be a generator of noise due to the infrastructure proposed and the scale of the site. Mitigation will be put into place, through siting and design and the use of acoustic fencing to minimise noise emissions at noise-sensitive properties. The development will adhere to the recommendations of the acoustic report.

Lighting

5.23 There will be a necessity for temporary illumination at the site during the construction period, which is expected to be approximately 18 months. The Applicant will ensure that lighting is minimised as much as possible and directed into the site (in line with operational requirements). During the operational stage, there will be no requirement of lighting, other than motion-controlled security lighting and occasional maintenance.

Air Quality

5.24 It is acknowledged that this development would rely upon HGV's and plant equipment during its construction. The construction period will last approximately fourteen months which includes the earthworks, construction, delivery of all equipment and installation.

5.25 The proposed development is unlikely to release pollutants or any hazardous, toxic or noxious substances to air or land during normal operation. Potential health impacts are therefore related primarily to construction and operational related impacts.

Access and Transport

5.26 The site is not adjacent to any core path and there is no public right of way across the site. Access to the site will be from the unnamed road, at its northern point.

- Operational Stage

5.27 During operational phase, the site will largely be unmanned. It is anticipated that 4 people will be employed, Traffic associated with the movement of employees to the site will be negligible.

- Construction Period

5.28 During construction phase, materials and infrastructure will be transported from the A76 via the A719, past Boydston and East Mosside to the unnamed road on into the site. It is estimated that during construction period the worst case daily HGV arrivals would be 10 vehicles and a maximum of 35 staff would arrive and depart outside of the AM and PM peak hours prior to the shifts starting and ending.

5.29 Vehicle routing, mitigation measures and minor areas of enhancement works to the existing road network are required and subject to implementation the proposed development would have minimal harm to highway safety.

Drainage / Flooding

5.30 An unnamed watercourse is located adjacent to the site which flows easterly to the Cessnock Water. The site is unaffected by fluvial floodplains and the proposed area for development is not at risk of surface water flood risk although a small area at the east boundary is need to allow for ingress and egress of surface water at identified flow rates.

5.31 There will be an increase in extent of impermeable surfaces which will result in an increase in runoff from the site. Mitigation is provided to attenuate to greenfield rates. Surface water will be discharged to the watercourses to the east and attenuation ponds will be provided for the northern and southern portions of the site. Sluice gates will be provided to cut runoff in the event of pollution incident or to prevent firewater runoff entering the natural site. A pump will be provided to allow top up of water in the reservoir in the case of emergency event.

6.0 Conclusion

6.1 Consent and deemed planning permission is sought from the Scottish Ministers under Section 36 of the Electricity Act 1989 for a 350MW BESS facility proposed on land near Craigie, in the South Ayrshire administrative area.

6.2 BESS facilities are recognised as being essential to support the continued development of renewable energy sources and to enhance the National Grid network to ensure sufficient supply of stable energy . The development, therefore, will be of national and local benefit.

6.3 The application is supported by a full suite of assessments which demonstrate that careful consideration has been paid to the appropriate siting and design of the facility, to ensure appropriate connection to the grid, without significant adverse impact on the environment. It is a site which benefits from no special landscape, nature or cultural designation and is set apart from the surrounding sporadic residential dwellings. It is acknowledged that the development will change the local landscape, but siting, design and planting mitigation is proposed which will reduce any potential impact.

6.4 The proposed development has been tested against relevant national and local policy and it is considered that, subject to mitigation, there will be no signficiant environmental effects and the proposed BESS facility will not have any adverse impact on any material matter as :

- The development complies with the requirements of the revised NPF4 and the recently adopted development plan
- There will be benefit from the proposal to the National Grid, to decarbonising electricity supply and meeting renewable energy and gas emission targets
- Connection can be made to the grid, at the existing Kilmarnock substation, via the existing public highway, further reducing environmental impact
- There will be economic benefit through employment generation particularly during the construction period
- The site is set apart from surrounding residential properties which amenity will be maintained through intervening landform, planting and acoustic features
- There are no special environmental, landscape or cultural designations in the vicinity of the site so the development will be carried out in a non-sensitive countryside location of poorer grade agricultural land
- Access to the site can be achieved via the existing highway with limited requirement for improvement or modification.

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