Scott Hobbs Planning

Planning Statement on behalf of:

Scott Stability Ltd

Date:

21 November 2022

Pre-Application Consultation Report

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. This report forms part of a suite of documents, submitted to the ECU of SG, to support the proposed development. This PACR details the pre-application consultation carried out prior to the submission of the application.

Contents

1.0 Introduction

1.1 This Pre-Application Consultation Report (PACR) submitted on behalf of the applicant, Scot Stability Ltd (the Applicant), supports the application for consent under Section 36 of the Electricity Act 1989 for a 350 MW BESS facility, with associated infrastructure, on land to the north of Camsiscan Farm, Craigie, Kilmarnock South, South Ayrshire, KA1 5JT (the site). The application is for a 350MW battery storage facility (BESS), with associated infrastructure (the proposal).

1.2 This PACR details the pre-application consultation carried out by the Applicant prior to the submission of the application.

2.0 The Proposal

2.1 The proposed development includes :

- Laying out of containerised battery units along with associated inverters, switchgear, closed loop cooling units, control units and associated electrical infrastructure mounted on concrete pads.
- An extra high voltage compound with associated switchgear and transformers, and containerised substation units and associated electrical infrastructure mounted on concrete pads.
- Transformers within bunded compounds.
- Standby power supply.
- Security welded mesh fence around the BESS substation and battery compound with access gate to the compound entrance from the road network.
- Erection of CCTV cameras.
- Laying out of a hard surfaced site access into to the BESS substation and battery compound from the internal road network. Car parking bays. Uncompacted gravel as a surface cover between the containerised units and equipment. Construction laydown area.
- Landscaping on boundaries of the site and within the terracing areas.

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. It comprises four primarily agricultural fields associated with the existing farm complex of Camsiscan Farm.

3.2 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.

3.3 There is an unnamed single-track road running alongside the site to the north which connects to the local Sidehead Terrace and the A79 which then lead to the A76 which is the main route connecting Kilmarnock to Cumnock.

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

4.0 Pre-Application Consultation

4.1 There is no statutory pre-application process for S36 applications for consent for battery storage sites, although the ECU has issued best practice guidance and encourages applicants to carry out such pre-application consultation. The best practice refers to all types of S36 applications including significant wind power proposals.

4.2 This BESS project is distinctly different to those forms of renewable energy projects, and due to its characteristics, has a significantly less impact, being substantially lower in height and generally comprising less area of land.

4.3 The applicant has carried out five forms of contact to statutory bodies and consultation :

- Environmental Impact Assessment Screening Request to ECU;
- Pre-application consultation with the ECU;
- Pre-application consultation with the appropriate planning authority, South Ayrshire Council; and, the neighbouring authority, East Ayrshire council;
- Pre-application consultation with the appropriate community council, Craigie Community Council; and,
- Unique website which contains details of the proposed development, information regarding the application and contact details for further information regarding the application.

EIA Screening Request

4.4 Whilst not a specific form of pre-application consultation, due to the scale of the development, an EIA Screening Request was submitted to the ECU in October 2022, in which detail on the proposed development and the likely environmental effects were explained. The ECU consulted South Ayrshire Council as the appropriate planning authority and East Ayrshire Council as a neighbouring authority.

4.5 On 9th November, SAC confirmed its opinion that the likely environmental effects were unlikely to be significant and that the development ought not be considered to be EIA development.

4.6 In its response, SAC identified the *' the main issues which have emerged from our review of the proposals assessed again the checklist relate to the potential landscape and visual impacts of the development in a local sense noting its scale and mass and the fact it is to be located in a relatively rural and agricultural area which is otherwise free from this type of development……. necessary for any future S36 application to evidence and present a suite of mitigation and design features which have been/will be utilised to minimise the visual and landscape impact of the development in the local area…… concerns about its impact in a local sense and in particular we would strongly encourage the applicant to carefully consider the heights of the development (10m and 15m in particular) and how it would sit within the immediate landscape. More specifically, we would request that the applicant explore options which could look to deliver a potentially lower density development (which we accept would result in the development being over a larger footprint area) as opposed to a more concentrated development of greater height and density which would be far more difficult to screen and mitigate*'.

4.7 The Applicant is not aware of any consideration having been made by East Ayrshire Council to the consultation on the Screening request..

4.8 To date, there has been no formal Opinion made by the ECU on behalf of the Scottish Ministers.

Pre-Application consultation with the ECU

4.9 A pre-application submission was originally made to the ECU in July 2022, and which was followed by a number of Team meetings and phone calls during which process and matters relating to the proposed development were discussed. The ECU has been kept updated on progress relating to the proposal and how material considerations would be treated during the application preparation stage.

- ## Pre-Application consultation with planning authorities

South Ayrshire Council

4.10 The application site is wholly contained within South Ayrshire Council area and accordingly, a pre-application submission was made to SAC in accordance with its practices during October and November 2022. SAC provided a copy of its response to the EIA Screening request to the applicant and subsequent discussions have been held regarding process and the merits of the proposal.

4.11 In general, SAC was supportive of the proposed development but required detailed assessment of the proposal, with supporting information submitted with the application, particularly with regards to the following issues, all of which have been addressed in the application documentation :

- Landscape and visual impact (see application documentation LVIA)
- Impact on Agricultural land (see Planning Supporting Statement)
- Noise (see Noise Assessment)
- Lighting (see Planning Supporting Statement)
- Design and Layout (see Design & Access Statement)

- Pollution / environmental impact (see Air Quality Assessment and Sustainability Statement, Geotechnical Report, Drainage Impact Assessment, Transport Report and oCTMP, Heritage Report and Confidential Ecological Report).

4.12 In particular, SAC raised potential concerns with the likely height of the proposed development. Since the EIA response, it has been confirmed to SAC that, following its stated concern, consideration has been given to the proposed height. All battery units will be kept to single-storey height – ie no greater than 3 m in height, a positive change to potential visual impact should the units have been proposed at double height (10m) as had originally been considered.

4.13 SAC was also reassured that the supporting infrastructure would be to a maximum height of 15m, rather than a continuous block of development, ensuring the visual impact is not as significant as SAC originally considered may have been possible. Finally, it has also been confirmed that the battery units can be coloured to meet stakeholder requirements, with green being considered the most appropriate colour.

4.14 It is considered that the application package addresses the matters raised by SAC during the pre-application stage.

East Ayrshire Council

4.15 No part of the application site lies within the East Ayrshire Council boundary, so EAC was consulted, on a pre-application basis, as a neighbouring authority. It is recognised that the underground cabling required to connect the BESS to the Kilmarnock South sub-station will lie within the EAC area. However, that infrastructure is the responsibility of Scottish Power to provide under its own rights as statutory provider.

4.16 The pre-application submission was made to EAC in October 2022. No response has yet been received.

Pre-Application consultation with Craigie Community Council

4.17 The proposed development falls wholly within the boundaries of Craigie Community Council. Notwithstanding the best practice guidance from the ECU, prior to proceeding on public event exhibition, CCC was contacted to discuss the preferred means of consultation and it confirmed that presentation to a meeting of CCC was the best method as public events were so poorly attended that consultation would not be effective.

4.18 Accordingly, and following discussion with the ECU and SAC, a presentation was given to CCC at its meeting on 9th November 2022, for which 12 members of the CCC attended. The presentation and subsequent discussion (using the PowerPoint presentation included as Appendix 1) lasted approximately 90 minutes when the following issues were discussed :

- Need for infrastructure on this site

  The prospective applicant explained the site-sifting process and discussion ensued regarding the need for BESS sites to regulate power for domestic, business and other uses.

- Safety

  The proposed attenuation ponds were referenced, and accepted to ensure safety

4.19 The feedback from the consultation event was that the need for the proposal was acknowledged, the site was recognised as the best possible for this form of development as the development was sited away from residential properties, other sensitive environmental and heritage sites and as the visual impact would be reduced using existing land contouring and planting proposals.

Website

4.20 A site and project specific website has been created at https://www.kilmarnockflexpower.com/ and has been available for public access since 16 November 2022. This website explains the proposal and the likely process and provides an email address should any person be interested in finding out more about the proposal. This website will be updated when the application is validated and the newspaper Notices are published. It will be made clear that any correspondence with the applicant team will not be a formal comment on the application and that direct response should be made to the relevant authorities. A copy of relevant information can be downloaded from the website.

5.0 Conclusion

5.1 The proposed BESS proposal is a much-needed renewable energy project proposed on countryside land of low-grade agricultural value in an area of limited environmental, ecological, heritage and amenity value.

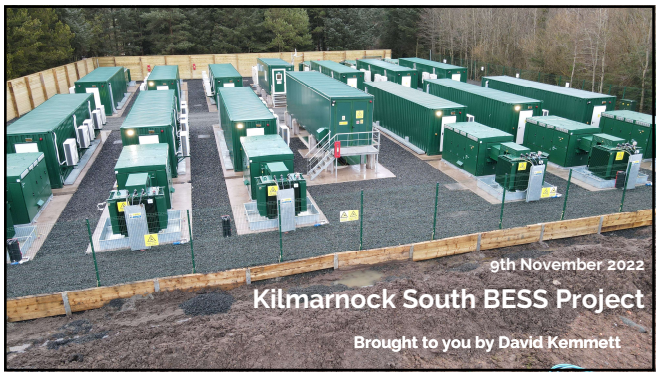
5.2 Pre-application consultation has been carried out with the statutory body, with the relevant local planning authority and with the appropriate community council in accordance with due process. The neighbouring planning authority has also been consulted. Discussions with the stakeholders have, to date, been positive.

5.3 It is acknowledged that other pre-application consultation has not been in accordance with the best practice guidance set out by the ECU. However, direct presentation was made to the appropriate community council, following the advice from the Community Council regarding the best approach for the development within this particular area. It is considered that in this circumstance, best practice has been followed as the Craigie Community Council is representative of those within the immediate area. Consultation has been positive.

5.4 In all respects, therefore, it is considered that pre-application consultation has been effective relative to the proposal and site.

Appendices

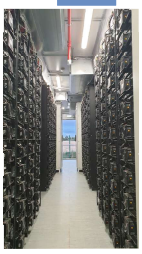
Appendix 1 – Craigie Community Council Presentation



1

What is BESS?

- Battery Energy Storage System (BESS)
- Lithium Ion – same battery technology that powers your smart phone
- Cells packaged into modules and stacked into containers
- DC battery voltage converted to AC using inverters, and transformed to grid voltages
- Stores energy for 2 hours at full power



Status: Planning

2

Who is it for and why?

- It is for our future
- A renewable grid needs BESS for
  - Frequency regulation
  - Stabilisation of voltage
  - Instant response to "events" (inertia)
  - Energy buffering (enabling renewable penetration)
- "Battery storage is a vital tool that we use to balance the grid and they play a wide range of roles in doing so." - National Grid
- Developed by Scot Stability, part of the Noriker group

Status: Planning

3

Kilmarnock South Overview

- Connected to Scottish Power Transmission
- Enables Scottish renewable generation to expand
- On 400kV transmission system, mainly supporting offshore wind
- Buffers energy north of constraint boundary
- 13 Ha site, 350MW power, 2 hour battery
- Designed to minimise landscape impact
- Includes biodiversity enhancement

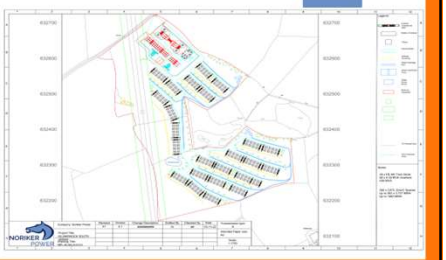
Scot Stability

Status: Planning

4

Kilmarnock South Construction

- Aug 2024 construction start
- Oct 2025 operation
- 4 acre biodiversity enhancement
- Design to blend with landscape



Status: Planning

5

Kilmarnock South Operation

- Safety by design – layout, proven technology types, fire mitigation, multiple layers of control from mature system running 13 UK grid-scale BESS projects
- Little impact from operation
  - Low traffic, only maintenance vans
  - Low noise
  - Visual impact mitigated by sensitive landscaping
  - Majority of site comprising standard height containers
  - No emissions
- Operated by Noriker, managing BESS since 2016

Status: Planning

6

7

Scott Hobbs Planning

24a Stafford Street
Edinburgh | EH3 7BD
0131 226 7225
info@scotthobbsplanning.com
www.scotthobbsplanning.com

Registered in Scotland No SC3388885