



# Planning Application for a Proposed Energy Storage System Development with Associated Infrastructure

Land South of the Struie Road, Contullich, AIness

Planning, Design and Access Statement

On behalf of Renewable Energy Systems Ltd

Date: December 2023 | Pegasus Ref: P23-1395

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## Document Management.

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## INTRODUCTION

1. This Planning, Design & Access Statement has been prepared by Pegasus Group on behalf of Renewable Energy Systems Limited (RES) (“the Applicant”). Planning permission is sought for the installation of a BESS on Land South of the B9176 Struie Road, the nearest postcode is IV17 OYA. The site is located c.1km north of the town of Alness, Scotland. The Site location is provided in the submitted Location Plan. ref. O5196-RES-MAP-DR-XX-002.
2. The description of development is as follows:  
  
*“Installation of an energy storage facility including battery enclosures, power conversion units, transformers, substations, grid connection infrastructure, vehicular access, and associated works.”*
3. Battery storage technologies are essential to speeding up the replacement of fossil fuels with renewable energy. Battery storage systems will play an increasingly pivotal role to responding to electricity demands. Battery storage, or BESS, are devices that enable clean energy from renewables, like solar and wind, excess to requirements to be stored and then released when the power is needed most, rather than being lost.
4. In 2020, a letter was issued by the Chief Planner regarding consents and variations to planning permission for energy generating ancillary uses. They highlighted that the Scottish Government considers battery installation, which stores electricity, is to be treated as a 'generating station'.

### **The Applicant**

5. RES is the world's largest independent renewable energy company with 40 years' experience developing, constructing and operating renewable energy assets. RES has delivered more than 21GW of renewable energy projects across the globe and supports an operational asset portfolio of over 7GW worldwide for a large client base all under long term contracts.
6. The Group's head office in Kings Langley, near London, is complemented by other offices across the UK including Glasgow, Gateshead, Truro, Cardiff and Larne. Internationally, RES has overseas subsidiary offices in France, Scandinavia, Australia, New Zealand, Canada, Turkey, Germany, and across the USA. The RES Group employs 3,000 staff. RES is a privately-owned company that grew out of the Sir Robert McAlpine group, a family-owned firm with over 130 years of experience in the construction and engineering sector. RES has strong in-house engineering and technical capability and operates in five main technology areas: on/offshore wind, solar, storage, green hydrogen and transmission & distribution.
7. Globally, RES is an industry leader in the delivery and operation of energy storage projects with 412MW of projects operational or in construction, and over 155MW of these in the UK and Ireland. RES has been named number 4 globally in energy storage integration by Navigant Research in 2019.
8. RES's first battery storage facility in the UK was in 2016 and consisted of the 330kW Copley Wood Project. This was designed, constructed and operated by RES for Western Power Distribution and was integrated into the existing solar farm infrastructure. In 2018, RES successfully handed over the Broxburn Battery Storage facility (20MW), the Port of Tyne



Battery Storage facility (35MW) and Tynemouth Battery Storage facility (25MW) which RES designed and constructed using Samsung batteries and SMA inverters with associated civil and electrical works. RES has been retained as both the Asset Manager and O&M service provider for the projects which has been successfully delivering frequency response services to National Grid since 2018.

9. More recently, between 2020–2022, RES has successfully developed, consented and secured investment for over 400MW of energy storage projects across the UK.

### **Supporting Documentation**

10. The following documents are submitted in support of the submission:
- Landscape and Visual Assessment (Pegasus Group)
  - Photomontages (Pegasus Group)
  - Landscape Masterplan (Pegasus Group)
  - Ecological Impact Assessment (Ramm Sanderson)
  - BIA Habitat Proposed Plan (Ramm Sanderson)
  - BIA Habitat Baseline Plan (Ramm Sanderson)
  - BIA Calculations (Ramm Sanderson)
  - Archaeological Desk-Based Assessment (SLR Consulting Ltd)
  - Acoustic Assessment (RES)
  - Flood Risk and Drainage Statement (RES)
  - Construction Environment Management Plan (RES)
  - Pre-Application Consultation Report (RES)
  - Fire Risk Statement (RES)
  - Arboricultural Impact Assessment (Scottish Arboricultural Services)
  - Arboricultural Method Statement (Scottish Arboricultural Services)
  - Tree Constraints Plan (Scottish Arboricultural Services)
  - Tree Protection Plan (Scottish Arboricultural Services)
  - Woodland Planting Plan (Scottish Arboricultural Services)
  - Agricultural Land Classification Report (Scottish Arboricultural Services)
  - Agricultural Land Classification Report (Roberts Environmental Ltd)

11. The following plans are submitted in support of the submission:

<b>Drawing Description</b>	<b>Drawing No.</b>
Infrastructure Layout	05196-RES-LAY-DR-PT-001
Visibility Splay	05196-RES-ACC-DR-PT-001
Typical Drainage Details	05196-RES-DRN-DR-PT-001
Location Plan	05196-RES-MAP-DR-XX-002
Battery Storage Enclosure	05196-RES-BAT-DR-PT-001
Spares Storage Container	05196-RES-BLD-DR-PT-001
Power Conversion System & Transformer – Twin Skid	05196-RES-PCS-DR-PT-001
Typical Security Fence Detail	05196-RES-SEC-DR-PT-001
Typical Acoustic Fence Detail	05196-RES-SEC-DR-PT-002
Typical Lighting & CCTV Column	05196-RES-SEC-DR-PT-003
Auxiliary Transformer	05196-RES-SUB-DR-PT-001
Harmonic Filter	05196-RES-SUB-DR-PT-002
Pre Insertion Resistor	05196-RES-SUB-DR-PT-003
Capacitor Bank	05196-RES-SUB-DR-PT-004
BESS Substation Building	05196-RES-SUB-DR-PT-005
DNO Substation Building	05196-RES-SUB-DR-PT-006
LV Feeder Pillar & Aggregation Panel Details	05196-RES-SUB-DR-PT-007

**Statement Approach**

12. The development management issues relevant to the application proposal are discussed in this statement. The subsequent sections of this statement are divided into:



- Section 2 outlines the application site and the surrounding area;
- Section 3 details the development proposals;
- Section 4 discusses the relevant national and local planning policy;
- Section 5 contains a planning assessment of the development proposals; and
- Section 6 contains the conclusion of the report.

13. This statement outlines the context of the application site and surrounding area, and the need for the proposed development, including an assessment of how it accords with relevant national and local planning policies as well as material considerations.

## SITE & SURROUNDINGS

### Application Site

14. The site measures at approximately 6.3ha in size and is located on land located c.1km north-west of the town of Alness. The project is located at land off the B9176, the closest post code is IV17 0YA. The project is located c.200m south-west of Alness Substation. The application site is depicted on the Site Location Plan (Reference: O5196-RES-MAP-DR-XX-002) submitted as part of this application. An aerial image of the site is included below at Figure 1.



*Figure 1: Aerial Image of Site*

15. The site is located within the administrative boundaries of Highland Council and is located approximately 25km north of the administrative centre of Inverness. The site is dominated by agricultural fields which are separated by a mix of fences and hedgerows.
16. In terms of the site surroundings, to the north of the site is the B9176 Struie Road, which runs along the western boundary heading north. Beyond this lies more agricultural fields. To the north-east is Alness Substation, and beyond this is the River Averon, roughly 0.6km away. To the east of site is woodland, which separates the project from the town of Alness. There is a gentle slope from west-east.





17. Access will be taken from the existing field access along the B9176, which sits c.240m south of the access serving the Alness Substation

## Site Context

18. The key site characteristics are detailed below:
- According to Scottish Environment Protection Agency (SEPA), the site is not at risk of flooding from fluvial sources. The nearest watercourse is the River Averon located to the north-east of site by roughly 0.4km. The site contains some areas at risk from surface water flooding along the eastern boundary. These areas are predicted to have a medium to high likelihood of surface water flooding.
  - The site is not located within an Air Quality Management Area (AQMA) nor is there one located in proximity.
  - The site is not subject to any national landscape designations. The Alness River Valley sits approximately 330m north-east of the site boundary and is a Site of Special Scientific Interest (SSSI). The Novar Special Protection Area (SPA) sits approximately 770m west of the site boundary. The Cromarty Firth sits approximately 2.5km south of the site boundary and is a Site of Special Scientific Interest (SSSI), Special Protection Area (SPA) and Ramsar Site.
  - There are no listed buildings within or immediately adjacent to the site. The nearest historic assets are within approximately 1.5km of the site boundary. The closest listed building is located 600m to the north, which is the 'Dal-Neigh Bridge' which crosses the River Alveron. The closest scheduled monument is 1.4km to the northwest, 'Moultavie, Cairn'. Aside from this, 'Millcraig, Chambered Cairn' is located 1.6km to the east.
  - According to Scotland's Soils map, the site is located on land capability for agriculture (LCA) Class 3.1 which is for "*Land capable of producing consistently high yields of a narrow range of crops and/ or moderate yields of a wider range. Short grass leys are common.*" This can be classed as prime agricultural land.

## Planning History

19. A site history search has been undertaken for the application site. There does not appear to be any planning history on any of the parcels of land within the site boundary.
20. In terms of the wider context, the nearest related works associated with Renewable Energy highlighted below:
- **22/05167/FUL** – Battery energy storage facility comprising access track, compound of battery and electrical equipment, meter building, stores, fencing, security cameras and landscaping. Planning permission granted 11/12/2023.
  - **22/02045/SCRE** – Installation of an energy storage system with a generating capacity of up to 50 megawatts. EIA not required in May 2022.



- **07/01020/FULRC** – Formation of access road. Application permitted in November 2007.



## DEVELOPMENT PROPOSALS

21. This section provides a key overview of the development proposals.

### Background, Needs and Benefits

22. The world's first integrated national grid opened in 1935 with several grid areas created to cover the UK. Rather than having a host of small power stations, these grid areas allowed energy supplies to become more accessible, cheaper, and stable. As the 20th century wore on, majority of power was still powered by coal. Remaining nuclear and coal power plants are in the process of reaching the end of their design lives or reducing in capacity.
23. The Distribution Network Operator (DNO) is responsible for the operation of the local grid network. The DNO is licensed to distribute electricity provided by the Scottish & Southern Electricity Networks (SSEN). They are responsible for the transmission of electricity in the North of Scotland. SSEN take electricity generated from power stations and various other energy sources and transport it through their vast transmission network. These systems are crucial to the delivery of the Government's renewable energy objectives.
24. There is a requirement to deliver an increasing amount of clean energy through renewable technologies, as acknowledged by the UK Government in the Energy White Paper in 2020. The Climate Change (Scotland) Act 2019 sets targets for the reduction of Scotland's emission of all greenhouse gases to net-zero by 2045. The First Minister of Scotland highlighted that the climate emergency is at the forefront of the Scottish Government programme going forward. The 2021 – 22 Programme states:
- "Energy and industry must be at the forefront of our progress towards net zero – securing the necessary emissions reductions, while driving investment and innovation in new technologies across the supply chain and, in turn, creating new, good and green jobs. To help drive that innovation and transition forward, the Scottish Government is investing £2 billion across 2021-22 to 2025-26 in large-scale, low carbon infrastructure."*
25. The biggest challenge facing renewable energy is that if it is not directly fed into the grid or used immediately, it is lost. Capturing excess energy that is ready to use is a fundamental challenge to ensure that all renewable energy systems can efficiently be given the opportunity to capture and store energy.
26. A battery storage system consists of batteries that can store energy and are able to release or absorb energy from the power network. Being able to absorb and release energy, the battery storage in this area can be used to contribute towards the frequency balancing services, where the power is being generated or absorbed statically or dynamically depending on the system frequency. When there is not enough power, batteries are discharged to balance under frequency preventing black and brown outs. To balance over frequency batteries are charged to prevent dangerous spikes across electricity infrastructure. Electricity is not physically generated on site.
27. In terms of these Development Proposals, a battery storage system is to be treated as a generating station, as per the Chief Planners letter in 2020. Battery storage can help curb climate change by decreasing emissions from electricity and heating needs. Having battery storage systems in place allows for more renewable energy systems to be in place in the future. This would initiate higher levels of energy security through integration of locally



produced energy which is stored and released to the grid. Ultimately, more of these systems will help to reduce the impacts of climate change and meet governmental targets.

28. Consequently, this form of development is crucial in enabling the continued rollout of zero carbon energy and is vital to ensuring that Scotland's ambitious net-zero emissions target is met. The development will provide valuable infrastructure to meet these targets, while supporting CO2 reduction to combat climate change and increasing the security of supply of electricity.

## Proposal

29. The applicant is seeking to construct and operate a battery energy storage system (BESS) of up to 45 megawatts (MW). The proposed BESS will be able to store, release or absorb energy from the electricity network. It will supply energy to the network during times of peak demand.
30. The site boundary for the application allows for all development associated with the proposed development including connection to the grid and landscaping features.
31. Access will be taken from the existing field access along the B9176, which sits c.240m south of the access serving the Alness Substation.
32. The associated equipment on the site and would comprise:
- Battery storage containers – 64no. battery units arranged in rows 6.1m in length, 2.4m wide, and 2.9m in height;
  - 2no. substations (1no. BESS substation and 1no. DNO substation);
  - 8no. combined Power Conversation Systems (PCS) and Transformers;
  - Aggregation Panel with LV Pillars;
  - Auxiliary Transformer;
  - LV Distribution Equipment;
  - Pre-Insertion Resistor;
  - Capacitor Bank;
  - Harmonic Filter and Resistor;
  - Spares Container;

### Other Details:

- Grassed soil bunds, infilling of hedgerows and new native woodland planting;
- Weldmesh or Acoustic fencing and Lighting /CCTV columns
- Acoustic fence included on the site for acoustic mitigation



## Pre-Application Consultation

33. The Town and Country Planning (Hierarchy of Developments) (Scotland) Regulations 2009 underlines that the construction of an electricity generating station where the capacity is or exceeds 20MW is classed as a Major Development. A Pre-Application Consultation (PAC) is a statutory requirement for major developments and is undertaken in accordance with procedures set out in the Town and Country Planning (Scotland) Act 1997.
34. It should be highlighted that where a Pre-Application Consultation (PAC) is required, under the Town and Country Planning (Scotland) Act 1997 and Regulation 6 of the Town and Country Planning (Development Management Procedure) (Scotland) Regulations 2013, a 'proposal of application notice' (PoAN) must be submitted to the local planning authority at least 12 weeks before the application for planning permission is submitted.
35. A PoAN was submitted to The Highland Council on 27th July 2023. This notice to the council advised how the applicant intended to engage with the community about their proposal. This allowed the community to put their views directly to the applicant before any planning application was submitted. A Pre-application meeting was then held with the Council on the 22nd August 2023.
36. A screening opinion under Regulation 8(1) of the Town and Country Planning (Environmental Impact Assessment) (Scotland) Regulations 2017 (the EIA Regulations) was submitted to the council on 8th September 2023. A decision was issued on 29th September 2023 where Highland Council were satisfied that the proposed development is unlikely to have significant environmental effects and were of the opinion that the proposal does not constitute Environmental Impact Assessment development.

## Public Consultations

37. As highlighted above, the applicant is asked to set out in advance to Local Planning Authority how they will carry out pre-application consultation. Applicants for major developments are asked to submit a pre-application consultation report with their application for proposed developments. This is provided within this application, although a summary is provided below.
38. Both public consultation events were held at Ardross Community Hall, Ardross, IV17 OXW, on, Thursday the 27th of August and the 28th of September to enable people to find out more about the proposed development and provide their feedback.
39. The applicants were on hand to answer any questions and provided comment forms to gather feedback. All information presented at the public consultation events were made available on the project website from the 4th of August 2023. Comment forms were also made available on the project website and was allowed to be sent via post to RES, 3rd Floor STV, Pacific Quay, Glasgow, G51 1PQ or e-mail to [carey.green@res-group.com](mailto:carey.green@res-group.com).
40. Advertisements for the events were posted in the Ross-Shire Journal as well as a newsletter sent to all residential properties within a minimum of 2.5km of the proposed

development. Both events were advertised in the same manner, a minimum of 7 days before the event took place.

41. Feedback from the initial consultation was collated and reviewed. This allowed for changes to the proposed development where appropriate, alongside the design iteration of the scheme by the applicant. This is set out in the Pre-Application Consultation Report.

## **Access**

42. Access will be taken from the existing field access which sits c.240m south of the existing substation access. Visibility splays of 215m with a 2.4m setback will be created. This access would have minimal disruption to the existing roads and field in question. This access will be used for construction and operational purposes.

## **Connection to Local Electrical Network**

43. It is proposed to connect the BESS to the nearby Scottish & Southern Electricity Networks (SSEN) Alness Substation. The site is in close proximity to this substation. Thus, the benefits that would flow from this proposal are viable.

## **Site Management**

44. Once operational, the facility will be remotely controlled and as such will be unmanned. There will however be a visit to the site approximately once a month by a car, van or light goods vehicle, to carry out regular inspections and route maintenance. Parking for these visits will be accommodated on site.
45. It is possible that one or more medium or large components may require replacement during the operational life of the facility. The nature of the traffic associated with such works will be similar to that used in the construction phase of the project but will be present for a much shorter duration. Should the scale of the works be such that traffic management measures would be required to manage vehicle movements to and from the site, the necessary permissions shall be sought from the local authority in line with due process.



## DESIGN AND ACCESS MATTERS

### Use

46. The proposal is for the installation of a BESS on Land South of the B9176 Struie Road, the nearest postcode is IV17 OYA. The site is located c.1km north of the town of Alness, Scotland.

*“Installation of an energy storage facility including battery enclosures, power conversion units, transformers, substations, grid connection infrastructure, vehicular access, and associated work”*

47. The site comprises approximately 6.3ha in size and is shown on the enclosed Site Location ref O5196-RES-MAP-DR-XX-002. The proposed system utilises proven lithium-ion battery technology which RES has deployed at multiple projects at locations including England, Scotland, Ireland, the USA and Canada. The majority of the infrastructure detailed below will be housed on an area of hardstanding enclosed within a compound by appropriate fencing.

### Amount, Scale and Appearance

48. The detailed plans for the site are submitted alongside this Planning, Design and Access Statement. The associated equipment on the site comprises:

#### Battery Containers

49. Approximately 64 battery storage enclosures would be installed to provide approximately 45MW of capacity. The battery enclosures will be one of two types depending on the final choice of supplier. The first type is shown in drawing O5196-RES-BAT-DR-PT-001 and is simply modified ISO-style shipping containers set on concrete foundations, with typical dimensions of 6.1m long, 2.4m wide and 2.9m high. Heating Ventilation & Air Conditioning (HVAC) units are located at each end of each container. The containers are generally finished in a shade of white or grey.
50. The second type are modular battery containers, also set on concrete foundations, which are ‘packed’ together to form similar dimensions to that of the container mentioned above. These modular battery storage enclosures have a white finish.

#### Substations

51. Two Control building units would be required. Located adjacent to each other, these would measure a maximum of 105m long in total, 5m wide and 4.5m high (See drawings O5196-RES-SUB-DR-PT-005 + O5196-RES-SUB-DR-PT-006). The units would be set on a concrete foundation.

#### Power Conversation Systems (PCS) and Transformers

52. Approximately 8 combined PCS’s and transformers would be required with typical dimensions of 10.3m long, 6m wide and 2.4m high (see drawing O5196-RES-PCS-DR-PT-001). They would also be set on concrete block foundations.

#### Auxiliary Transformer



53. An auxiliary transformer with typical dimensions of 2.5m long, 2.3m wide and 2.7m (O5196-RES-SUB-DR-PT-001) high would be installed adjacent to the energy storage enclosures. This would be set on concrete foundations measuring approximately 2.0m by 1.6m.

#### **Grid Compliance Equipment**

54. It is expected that grid compliance equipment will be required. The sizes will vary but are listed in the following drawings: O5196-RES-SUB-DR-OT-002 and O5196-RES-SUB-DR-PT-003 and O5196-RES-SUB-DR-PT-003). They will each be set on concrete foundations.

#### **Spares Container**

55. One additional ISO-style shipping container will be located adjacent to the battery enclosures with typical dimensions of 13.7m long, 2.4m wide and 2.9m high. It would be finished in a shade of white, grey or green (see drawing O5196-RES-BLD-DR-PT-001).

#### **Security**

56. Stands for CCTV cameras will be installed on site. The CCTV cameras are mounted on galvanised steel posts (or similar) measuring up to approximately 4m high and set in concrete foundations. The cameras may have pan, tilt and zoom functions. They will be located adjacent to the security fencing around the edge of the energy storage compound (see drawing O5196-RES-SEC-DR-PT-003).
57. Security fencing will be installed around all four edges of the energy storage compound. The fencing will either be palisade security fencing, weld mesh or closed board wooden acoustic fencing up to 4m in height (see drawings O5196-RES-SEC-DR-PT-001).
58. Lighting is provided for occasional operational and maintenance use in the hours of darkness. The lights are to be manually switched rather than automated. These lights will be directed/shielded to prevent glare and light spill onto public highways and nearby woodland. The operation and maintenance activities shall normally be limited to the hours of daylight to minimise use of artificial lighting. Lighting is only used for operational and maintenance activities.

#### **Grid Connection**

59. Cabling will connect all equipment within the battery storage compound to the on-site customer substation. From here, a cable(s) will then connect the on-site customer substation to the existing Electrical substation located approximately 250m to the north-east of site.

#### **Temporary Construction Compounds**

60. A temporary construction compound is required for use during the construction period. The temporary compound will be used to locate facilities such as a site office, storage areas for materials and machinery, a welfare area and parking for vehicles. This temporary compound will be removed once it's no-longer necessary.
61. Further details are provided on the Site Layout ref. O5196-RES-LAY-DR-PT-001.

#### **Layout**



62. The proposed layout of the site is shown in the Infrastructure Layout Plan (O5196-RES-LAY-DR-PT-001). The layout has been guided by a number of factors, but primarily by the operational requirements of an energy storage facility combined with site constraints.
63. The battery storage enclosures and associated PCS and transformer units have been sited in close parallel rows to reduce the amount of cabling required between each unit and to condense the area required for the overall development. Space between the equipment on site and surrounding fence has also been left in order to provide sufficient space for a crane during construction and in case of repair and augmentation.

## **Access**

64. Access will be taken from the existing field access which sits c.240m south of the existing substation access. this access was chosen as it allows better visibility from the north and south. Visibility splays of 215m are more easily achieved, and there is a clear view from the entrance from further away.

## **Landscaping**

65. A landscaping plan has been submitted (drawing ref: P23-1582\_EN\_001) which takes account of the identified areas of sensitivity. Additional screening in the form of grassed soil bunds, the infilling of hedgerows and new native woodland planting which would mitigate any potential impacts further.

## **Drainage**

66. A Sustainable Drainage System (SuDS) will be utilised to manage on-site surface water run-off. A full drainage assessment will be completed to assess appropriate options for this site before reaching a conclusive design. No foul water will be generated by the proposed development.

## PLANNING POLICY

67. Scotland's planning system is plan-led. The 'purpose of planning' is "to manage the development and use of land in the long-term public interest". Development plans set out how places will change into the future, including the long-term vision for where development should and shouldn't happen.
68. This section sets out the relevant policies of the adopted Development Plan, any material considerations of relevance policies of the adopted Development Plan, any material considerations of relevance to the determination of this planning application and any emerging local plan policy.
69. Significant changes to development planning were made by the Planning (Scotland) 2019 Act. The statutory Development Plan comprises:
- The National Planning Framework 4 (adopted 13 February 2023)
  - Highland-wide Local Development Plan (adopted 5 April 2012)

### National Planning Framework 4

70. The National Planning Framework 4 (NPF4) was adopted on 13th February 2023. NPF4 sets out Scotland's spatial principles, regional priorities, national developments and national planning policies which reflect Scottish Ministers' priorities for the development and use of land. NPF4 also relates to preparation of development plans, development design and determination of planning applications and appeals. NPF4 plays a key role in supporting the delivery of Scotland's national outcomes and the United Nations Sustainable Development Goals.
71. Following the approval by the Scottish Parliament of National Planning Framework 4 (NPF4) on 11 January 2023, the Chief Planner provided advice on NPF4 becoming part of the statutory 'development plan' alongside local development plans (LDPs). The intention for this advice being to support consistency in decision making ahead of new style LDPs being in place.
72. This means that former Strategic Development Plans, National Planning Framework 3 and Scottish Planning Policy are superseded. Thus, NPF4 forms part of the statutory development plan relevant to the consideration of this development proposal and carries significant weight.
73. All planning applications in Scotland must be determined in accordance with the provisions of NPF4 and the relevant Local Development Plans unless material considerations indicate otherwise. If there is any inconsistency with NPF4 policies and an LDP adopted before 13 February 2023, NPF4 will take precedence. The Scottish Government expects new LDPs in future to be more place-based. National policies relevant to the site are outlined in NPF4.
74. Given the size of this proposal (exceeding 20MW), this proposal qualifies as a major development and would require a pre-application consultation before any subsequent application for planning permission is submitted. This type of scheme carries weight from within NPF4.

75. The following NPF4 policies are considered applicable to the proposed development:

**Policy 1: Tackling the climate and nature crises** – states proposals should give significant weight to global climate and natural crisis.

**Policy 3: Biodiversity** – states development should contribute to enhancing biodiversity, integrating nature-based solutions where possible. Major proposals should demonstrate how they will conserve, restore and enhance biodiversity, including nature networks so they are in a demonstrably better state than without intervention. Any potential adverse impacts should be minimised through careful planning and design.

**Policy 4: Natural places** – notes how development proposals which by virtue of type, location or scale will have an unacceptable impact on the natural environment, will not be supported. Point (d) states development proposals that affect a site designated as a local nature conservation site or landscape area in the LDP will only be supported where:

*i. Development will not have significant adverse effects on the integrity of the area or the qualities for which it has been identified; or*

*ii. Any significant adverse effects on the integrity of the area are clearly outweighed by social, environmental or economic benefits of at least local importance.*

**Policy 5: Soils** – The policy intent is to protect carbon-rich soils, restore peatlands and minimise disturbance to soils from development. The Policy supports the generation of energy from renewable sources on prime agricultural land, or land of lesser quality that is culturally or locally important for primary use.

**Policy 7: Historic assets and places** – aims to protect and enhance the historic environment, including protecting heritage assets, listed buildings, conservation areas and scheduled monuments.

**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...’ Part a(iii) specifically supports ‘energy storage, such as battery storage and pumped storage hydro’.

Point (c) of the policy states 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

Point (e) sets out a range of impacts which should be addressed through project design and mitigation. Not all are relevant to the proposed development, but includes impacts on communities and individual dwellings, such as residential amenity, visual impact and noise. Other impacts include landscape visual impacts, road traffic, biodiversity and trees.

**Policy 13: Sustainable Transport** – This policy aims to encourage, promote and facilitate developments that prioritise walking, wheeling, cycling and public transport for everyday travel and reduce the need to travel unsustainably.

**Policy 22: Flood risk and water management** – seeks to strengthen resilience to flood risk. Point (c) notes how development proposals are expected not to increase the risk of surface

water flooding, manage rain and surface water through SUDS and minimise areas of impermeable surfaces.

**Policy 23: Health and safety** – point (e) states 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.

## Highland-wide Local Development Plan

76. The Highland Council adopted the Highland-wide Local Development Plan (HWLDP) in April 2012. Currently, NPF4 is part of the statutory development plan and is relevant to the consideration of this development proposal. Ultimately, NPF4 carries significant weight since the HWLDP will lead to a reduction in the number and range of policies required in the Local Development Plan.
77. The Highland Council expect to take forward a review of the HwLDP under the new arrangements for Local Development Plans, with formal work anticipated to start. Formal work for a proposed Local Development Plan is not at a stage of preparation and is not yet at an advanced enough stage to be a material consideration.
78. The following Highland-wide Local Development Plan policies are considered applicable to the proposed development:
  - Policy 28 – Sustainable Design
  - Policy 29 – Design Quality and Placemaking
  - Policy 30 – Physical Constraints
  - Policy 31 – Developer Contributions
  - Policy 36 – Development in the Wider Countryside
  - Policy 51 – Trees and Development
  - Policy 56 – Travel
  - Policy 57 – Natural, Built and Cultural Heritage
  - Policy 58 – Protected Species
  - Policy 59 – Other Important Species
  - Policy 60 – Other Important Habitats
  - Policy 61 – Landscape
  - Policy 66 – Surface Water Drainage
  - Policy 67 – Renewable Energy Developments

- Policy 69 – Electricity Transmission Infrastructure
- Policy 72 – Pollution
- Policy 74 – Green Networks
- Policy 77 – Public Access
- Policy 78 – Long Distance Routes

79. An extract of the Proposals Map is highlighted in Figure 2.

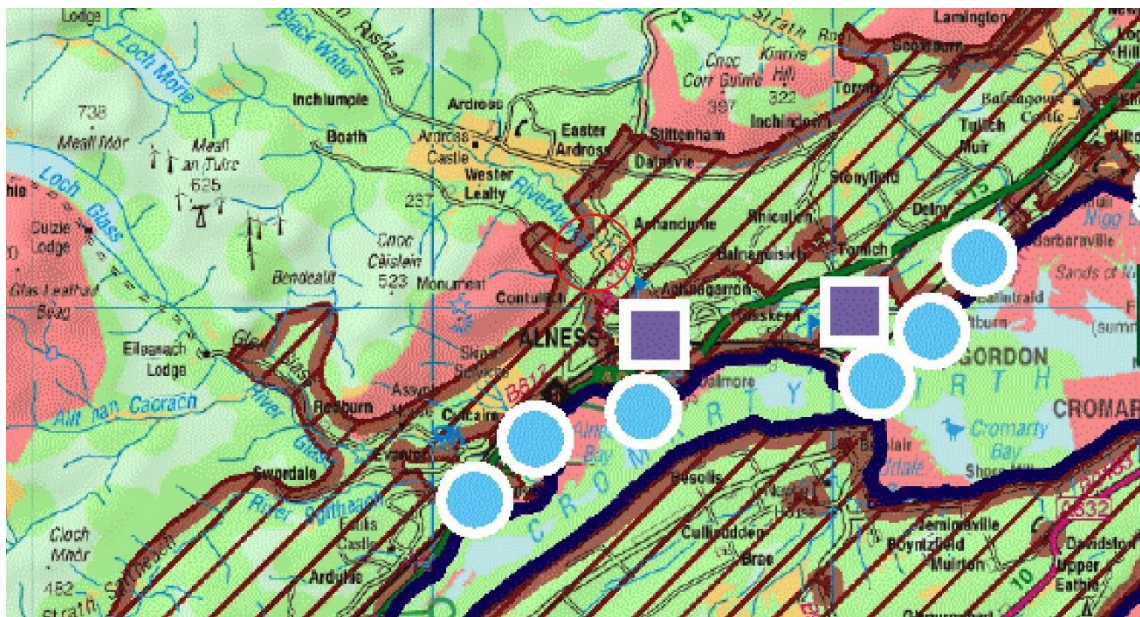


Figure 2: Extract of the Proposals Map

## Other Material Considerations

80. The following lists the relevant (and extensive) key renewable energy policy and legislation. All are material considerations in the determination of these proposals.

### International Agreements and Obligations

#### The COP21 UN Paris Agreement 15

81. The Paris Agreement (December 2015) is an international agreement on climate change, of which there are 195 countries, including the UK. The Agreement came into force on November 4th, 2016, having been ratified by at least 55% (the point which triggers ratification) of the 195 countries.
82. The meeting in Paris was considered a make-or-break opportunity to secure an international agreement on the approach to tackling climate change, commitment to a longer-term goal of near zero net emissions in the second half of the century and supporting the transition to a clean economy and low carbon society.

83. Governments agreed:
- A long-term goal of keeping the increase in global average temperature to well below 2°C above pre-industrial levels.
  - To aim to limit the increase to 1.5°C, since this would significantly reduce risks and the impacts of climate change.
  - On the need for global emissions to peak as soon as possible, recognising that this will take longer for developing countries.
  - To undertake rapid reductions thereafter in accordance with the best available science.
84. Countries will also be legally obliged to make new post-2030 commitments to reduce emissions every five years.
- [The Intergovernmental Panel on Climate Change \(IPCC\) Sixth Assessment Report \(2021\), related Press Release and Statements \(2021\)](#)
85. The first part of the Intergovernmental Panel on Climate Change (IPCC) Sixth Assessment Report (AR6) was published on 9 August 2021. The Working Group I (WGI) contribution to the Intergovernmental Panel on Climate Change (IPCC) Sixth Assessment Report (AR6) assesses the physical science basis of climate change. It acknowledges that there is an improved understanding of the current state of the climate, human influence on the climate System, possible climate futures and climate information for risk assessment and regional adaptation.
86. The key points taken from the report are:
- It is unequivocal that human influence has warmed the atmosphere, ocean and land.
  - The scale of recent changes across the climate system as a whole – and the present state of many aspects of the climate system – are unprecedented over many centuries to many thousands of years.
  - Human-induced climate change is already affecting many weather and climate extremes in every region across the globe. Evidence of observed changes in extremes such as heatwaves, heavy precipitation, droughts, and tropical cyclones, and, in particular, their attribution to human influence, has strengthened since the last report.
  - Global surface temperature will continue to increase until at least mid-century under all emissions scenarios considered. Global warming of 1.5°C and 2°C will be exceeded during the 21st century unless deep reductions in carbon dioxide (CO<sub>2</sub>) and other greenhouse gas emissions occur in the coming decades.
  - Many changes due to past and future greenhouse gas emissions are irreversible for centuries to millennia, especially changes in the ocean, ice sheets and global sea level.



- With further global warming, every region is projected to increasingly experience concurrent and multiple changes in climatic impact-drivers. Changes in several climatic impact-drivers would be more widespread at 2°C compared to 1.5°C global warming and even more widespread and/or pronounced for higher warming levels.

#### COP26 – The Glasgow Climate Pact (November 2021)

87. The negotiations at the COP26 climate summit held in November 2021 under the UN Framework Convention on Climate Change. The aim of COP26 was to keep alive the hope of limiting the rise in global temperature to 1.5C. After 13 days of intense negotiations, COP26 concluded on Saturday 13th November 2021 with every Party at COP26 – representing almost 200 countries – agreeing the Glasgow Climate Pact. However, even with the action committed both during and before COP26, communities around the world would continue to feel the impact of climate change on the planet, work must continue beyond COP26 with concerted and immediate global effort to deliver on all pledges.

#### IPCC Second AR6 Report (February 2022)

88. The second part of the IPCC's AR6 Report was published on 28 February 2022. It highlights throughout that climate change has already disrupted human and natural systems. Past emissions, development and climate change have not advanced global climate resilient development. It states that societal choices and actions implemented in the next decade determine the extent to which medium and long-term pathways will deliver higher or lower climate resilient development. It importantly confirms that development prospects are increasingly limited if current greenhouse gas emissions do not rapidly decline, especially if 1.5°C global warming is exceeded in the near-term. This can only be enabled by inclusive governance, adequate and appropriate human and technological resources, information, capacities, and finance.

#### IPCC Third AR6 Report (April 2022)

89. The third part of the IPCC's AR6 Report 'Mitigation of Climate Change' was published on 04 April 2022. The latest report consequences of the failing to limit the rise of global temperatures and that reducing emissions is a crucial near-term necessity.
90. Global GHG emissions in 2030 associated with the implementation of Nationally Determined Contributions announced prior to COP26 would make it likely that warming will exceed 1.5°C during the 21st century. Policies implemented by the end of 2020 would be projected to result in higher global GHG emissions than those implied by NDCs. It suggests that limiting warming to below 2°C would then rely on a rapid acceleration of mitigation efforts after 2030.

#### IPCC AR6 Synthesis Report (March 2023)

91. The IPCC published 'The Synthesis Report', last of the AR6 products, in March 2023. They warned that the emissions curve is not bending yet and that between 2010 and 2019, the earth experienced the highest levels of emissions in human history.
92. Climate action and progress has been made, and there are solutions available for mitigation and adaptation. However, this is not enough to respond to this crisis. Immediate and deep emissions reductions across all sectors are needed urgently. According to the IPCC report,



limiting global warming to 1.5°C requires a peak before 2025, reduce emissions by 43% by 2030, 60% by 2035 and reach net-zero in early 2050.

## **United Kingdom Energy matters**

### UK 2050 Net Zero Target

93. The UK Renewable Energy Strategy (UKRES) sets out the means by which the UK can meet the legally binding target of 15% of energy consumption from renewable sources by 2023. It presents a 'lead scenario' that more than 30% of electricity should be generated from renewables by 2020.
94. A key element of the Strategy is that it sets out the EU requirement that progress will be reported to the EU every two years, in terms of the achievement of delivery against the trajectory set for the 2020 target. The purpose of the milestone reporting is to ensure that a trajectory is maintained towards 2020.
95. Under the Directive, the UK has interim targets to achieve the following shares for renewables in the energy mix as follows:
  - 7.5% in 2015 – 2016.
  - 10.2% in 2017 – 2018.

### The UK's Sixth Carbon Budget (December 2020)

96. The Committee on Climate Change (CCC) published their advice on the UK's sixth Carbon Budget 'The UK's Path to Net Zero' in early December 2020. It builds on the previous CCC advice to Government in relation to net zero.
97. The CCC has set out some recommended priorities for UK policy, including:
  - Sets a Sixth Carbon Budget to require a reduction in UK greenhouse gas emissions of 78% by 2035 relative to 1990 levels;
  - This is seen as a world leading commitment, placing the UK "decisively on the path to net zero by 2050 at the latest with a trajectory that is consistent with the Paris Agreement";
  - It should be accompanied by an ambitious 2030 pledge to reduce emissions by at least 68% from 1990;
  - The recommended budget would achieve well over half of the required emissions reduction to 2050 in the next 15 years.
  - Key benefits for the UK are seen as including the opportunity for low carbon investment – recognised at a time when it is needed to support the UK's economic recovery from the COVID-19 health crisis.
98. Although the Report recognises that the main policy levers are held by the UK Government it states at Para 23 that "UK climate targets cannot be met without strong policy action across Scotland, Wales and Northern Ireland" and that Scotland can take action through



complementary measures at the devolved level including supporting policies such as “planning and consenting”.

99. The CCC is clear in setting out that new demand for electricity will mean that electricity demand will rise 50% to 2035 and “doubling or even trebling by 2050”. The CCC advice sets out that reducing emissions and meeting the budget requires action across various areas including expansion of low carbon energy supplies.
100. Page 29 sets out recommendations for action including “delivering the actions required in the 2020s to meet the Sixth Carbon Budget requires policies to be strengthened now. Matching strong ambition with action is vital for the UK’s credibility...”

#### The UK Energy White Paper (December 2020)

101. The Energy White Paper ‘Powering our Net Zero Future’ was published on 14 December 2020. The White Paper builds on the Prime Minister’s recently announced ‘Ten Point Plan’ to set the energy-related measures and a long-term strategic vision for the energy system, consistent with net zero emissions by 2050. It sets out (page 2) that it “puts net zero and our effort to fight climate change at its core.”
102. It also aims to support a ‘green recovery’ from COVID-19 and confirms that electricity demand could double by 2050. Whilst offshore renewables are expected to grow significantly, the White Paper also sets out that “onshore wind and solar will be key building blocks of the future generation mix, along with offshore wind. We will need sustained growth in the capacity of these sectors in the next decade to ensure that we are on a pathway that allows us to meet net zero emissions in all demand scenarios” (page 45).

#### The UK Net Zero Strategy (October 2021)

103. The UK Government published the Net Zero strategy in October 2021. The Net Zero Strategy is a UK government strategy that sets out plans to reduce climate-changing emissions and decarbonise all sectors of the UK economy, from transport to agriculture. These plans are needed to meet its target of net zero emissions by 2050, and the shorter-term targets that ensure action starts now, and isn’t kicked down the road. The Strategy was submitted to the United Nations Framework Convention on Climate (UNFCCC) as the UK’s second long-term low greenhouse gas emission development strategy under the Paris Agreement.
104. The strategy also builds on the Government’s Ten Point Plan with a vision to create new jobs and net zero industries to meet climate targets.

#### UK Renewable Energy Strategy (2009)

105. The UK Renewable Energy Strategy (UKRES) sets out the means by which the UK can meet the legally binding target of 15% of energy consumption from renewable sources by 2023. It presents a ‘lead scenario’ that more than 30% of electricity should be generated from renewables by 2020.
106. A key element of the Strategy is that it sets out the EU requirement that progress will be reported to the EU every two years, in terms of the achievement of delivery against the trajectory set for the 2020 target. The purpose of the milestone reporting is to ensure that a trajectory is maintained towards 2020.

107. Under the Directive, the UK has interim targets to achieve the following shares for renewables in the energy mix as follows:

- 7.5% in 2015 – 2016.
- 10.2% in 2017 – 2018.

#### UK Renewable Energy Roadmap Update (2013)

108. The Government first published the Renewable Energy Roadmap in July 2011; which sets out the path to achieve the UK's headline renewable energy target. Paragraph 1 of the November Update reaffirms the UK Government commitment towards the delivery of renewable energy.

109. The Roadmap has been updated on two occasions since July 2011, once in 2012 and most recently in November 2013. The update sets out the progress that has been made against the 15% target introduced in the 2009 EU Renewable Energy Directive and provides an overview of development that has occurred in the sector.

110. The opening Ministerial Statement to the Update identifies how the Government remains strongly committed to cost effective renewable energy as part of a diverse, low-carbon and secure energy mix. The Minister concludes by emphasising how the Update to the Renewable Energy Roadmap has been produced in collaboration with other Government Departments and Devolved Administrations.

#### **Scottish Energy matters**

##### The Climate Change (Scotland) Act 2009

111. The Climate Change (Scotland) Act 2009 initially established long term statutory targets for Scotland of reducing greenhouse gas emissions by at least 80% by 2050, with an interim target of reducing emissions by at least 42% by 2020. The Act also placed climate change duties on Scottish public bodies and included provisions on climate change including adaption, forestry, energy efficiency and waste reduction.

##### Climate Change (Emissions Reduction Targets) (Scotland) Act 2019

112. The Scottish Government set out short, medium, and long-term goals and when they are to be achieved by in the Climate Change (Emissions Reduction Targets) (Scotland) Act 2019. It sets targets for the reduction of Scotland's emission of all greenhouse gases to net-zero by 2045, in doing so amending the Climate Change (Scotland) Act 2009. The Climate Change Act reaffirms Scotland's commitment to remain at the forefront of global ambition, increasing its reduction in emissions targets to limit global temperature rises to 1.5 degrees Celsius above pre-industrial levels. Scotland proposes to reduce emissions by 56% by 2020, 75% by 2030, and 90% by 2040.

##### Scottish Energy Strategy: The future of energy in Scotland

113. The Scottish Government published its Scottish Energy Strategy: The future of energy in Scotland in December 2017. The strategy sets out an overall 2050 vision for Scotland:

*"A flourishing, competitive local and national energy sector, delivering secure, affordable, clean energy for Scotland's households, communities and businesses."*

114. The strategy sets two new targets for the Scottish energy system by 2030:
- The equivalent of 50% of the energy for Scotland's heat, transport, and electricity consumption to be supplied from renewable sources.
  - An increase by 30% in the productivity of energy use across the Scottish economy.

#### The Global Climate Emergency – Scotland's Response

115. On 14 May 2019 the Climate Change Secretary Roseanna Cunningham made a statement to the Scottish Parliament regarding Scotland's response to the climate change emergency. Her statement highlighted inter alia:

*"There is a global climate emergency. The evidence is irrefutable. The science is clear. And people have been clear: they expect action. The Intergovernmental Panel on Climate Change [IPCC] issued a stark warning last year: the world must act now. By 2030 it will be too late to limit warming to 1.5 degrees..."*

*...It's not too late for us to turn things around, but to do so requires transformative change. This is not just about government action. And it is not something that only affects Scotland... We all have a part to play individuals, communities, businesses, other organisations..."*

*...Earlier this month, the Scottish Government received advice from the UK Committee on Climate Change [CCC] in light of the IPCC report. We acted immediately with amendments to our Climate Change Bill to set a 2045 target for net zero emissions...these will be the most stringent legislative targets anywhere in the world and Scotland's contribution to climate change will end, definitively, within a generation. The CCC was clear that this will be enormously challenging..."*

*...The CCC has been stark in saying that the proposed new targets will require a 'fundamental change from the current piecemeal approach that focuses on specific actions in some sectors to an explicitly economy wide approach'. To deliver the transformational change that is required, we need structural changes across the board: to our planning, procurement and financial policies, processes and assessments...that is exactly what we will do."*

#### Scotland Climate Change Plan (2018)

116. The Climate Change Plan (2018) provides the framework for Scotland's transition to a low-carbon economy, setting out how emissions will be reduced in every year to 2032.
117. The Climate Change Plan highlights that climate change is one of the greatest global threats we face, and that Scotland must play its part to achieve the ambitions set out in the Paris Agreement, which mandates concerted, global action to deal with the threat. It notes that the path towards a low carbon future will require great effort across all parts of our society and economy, but it also presents tremendous opportunities.



The Update to the Climate Change Plan (2018–2032) ‘Securing a Green Recovery on a Path to Net Zero’ (16 December 2020)

118. The Scottish Government published a Roadmap to world-leading climate change targets, with more than 100 new policies and proposals to support Scotland’s green recovery and help deliver a just transition to Net Zero. They form part of the Climate Change Plan 2018 – 2032, which has been updated to reflect the world’s most ambitious framework of climate targets as enshrined in Scotland’s Climate Change Act 2019. The Plan also increases the ambition of more than 40 other policies to cut greenhouse gas emissions across all sectors.
119. The Scottish Government’s vision for 2045 is one of a society that prioritises the environment and the wellbeing of its people, reaching net zero in a way that is fair and just to all. A key part of the plan is the green recovery, and it states (page 1) that: “It is essential that a recovery from the pandemic responds to the climate emergency and puts us on a pathway to deliver our statutory climate change targets and a just transition to net zero, by ensuring our actions in the immediate term are in line with our long-term goals”. “The Scottish Government has been clear in its commitment to securing a just and green recovery, which prioritises economic, social and environmental well-being, and responds to the twin challenges of the climate emergency and biodiversity loss”.
120. In terms of electricity, the CCP update announces, “further policies to continue the rapid growth in renewable generation over the past 20 years, moving from a low to a zero carbon electricity system”. Reference is also given to the intention to prepare an Energy Strategy update in 2021 and an updated Electricity Generation Policy Statement by 2022.
121. Page 18 states that “by 2032 our energy system will be in the midst of a major transformation, integrating new ways of producing, transporting and using energy with existing technologies. This transformation will be planned and developed through a systems led approach, ensuring that decisions take account of the benefits across all of the energy sectors as well as the economic and social benefits they create for everyone in Scotland. By 2032 we will generate at least the equivalent of 50% of our energy across heat, transport and electricity demand from renewable sources”.

The 2020 Routemap for Renewable Energy in Scotland

122. The Scottish Government produced the Renewable Action Plan (RAP) in 2009 to drive development of renewable energy and to establish a framework for action relating to specific areas of renewable energy. This is updated annually in order to provide an indication as to the progress being made towards implementing the changes.
123. The 2020 Routemap for Renewable Energy in Scotland 2011 is an update and extension of the 2009 Action Plan and reflects the Scottish Government’s target of meeting an equivalent of 100 % demand for electricity from renewable energy by 2020, as well as the target of 11% renewable heat. The Routemap is therefore an important Scottish Government policy document. In order to achieve the delivery target of 100% renewables, equates to the equivalent of 16GW of installed capacity and that to achieve this target the Routemap states that this will demand a ‘significant and sustained improvement over the deployment levels seen historically’ (pg. 26).
124. The Executive Summary concludes by stating that:



*“Across all scales of renewable generation, from householder to community to large-scale commercial schemes, the Scottish Government is working to make Scotland the renewables powerhouse of Europe. The benefits are not only in terms of energy generation and future security of supply but can underpin our economic recovery over the next decade and beyond. This Routemap for renewable Energy in Scotland sets out how we can meet our challenging targets in harmony with the local environment and make a wider contribution to emission reductions through the displacement of fossil fuel generation.”*

#### Electricity Generation Policy Statement (2013)

125. The Scottish Government published the Electricity Generation Policy Statement (EGPS) on 28 June 2013. It states at paragraph 1 that electricity generation and the economic and environmental benefits which could arise from a shift from fossil fuel generation to a portfolio comprising renewable and cleaner thermal generation are matters of considerable importance to the Scottish Government.
126. The report summarises the Scottish Government’s targets and these are set out as inter alia:
- Delivering the equivalent of at least 100% of gross electricity consumption from renewables by 2020 as part of a wider, balanced electricity mix.
  - Enabling local and community ownership of at least 500 MW of renewable energy by 2020.
  - Seeking increased interconnection and transmission upgrades capable of supporting projected growth and renewable capacity’.
127. In terms of economic benefit, the report states that it is expected that there would be, over the decade to 2020, from renewables alone, a provision of up to 40,000 jobs and £30 Billion of investment to the Scottish economy and a transformational opportunity for local ownership and benefits.
128. Paragraph 17 states that the Government estimates that the 100% target will require around 14-16GW of installed capacity to be deployed.
129. Page 11 of the report explains that the UK target is to produce 15% of all energy from renewable sources and an estimated 30% of electricity from renewable sources by 2020 and that this:
- “will require connection to Scotland’s vast energy resource and we will continue to work to connect Scotland to an ever more integrated UKL and EU market’ The Report cross refers to the 2020 Routemap for renewable energy in Scotland. Paragraph 32 reiterates the EU context and states that Scotland has the potential to make a ‘major contribution to the EU’s overall renewables target.”*
130. The Report cross refers to the 2020 Routemap for renewable energy in Scotland. Paragraph 32 reiterates the EU context and states that Scotland has the potential to make a ‘major contribution to the EU’s overall renewables target’.

### The Scottish Energy Strategy Position Statement (March 2021)

131. The Scottish Government published 'Scotland's Energy Strategy Position Statement' in March 2021. The Position Statement provides an overview of key priorities for energy.
132. The Ministerial Foreword refers to the challenges of the pandemic which has created an economic crisis. It notes that the Climate Emergency "has continued unabated". It states that "the need for a Just Transition to net zero greenhouse gas emissions by 2045, in a manner that supports sustainable economic growth and jobs in Scotland, is greater than ever".
133. Since Scotland's last Energy Strategy was published, the Scottish Government has continued to commit to achieving ambitious targets of net zero greenhouse gas emissions by 2045 and a 75% reduction by 2030.
134. Section 5: A Green Economic Recovery of the document states that "Creating green jobs are at the heart of the Scottish Government's plans for a fair, resilient and green economic recovery." When describing how the support for industries and sectors across the energy landscape would be support, it is highlighted that the continued growth of Scotland's renewable energy industry is fundamental to enable Scotland to create sustainable jobs in order to transition towards net zero.

### The Scottish Government & Scottish Green Party: Shared Policy Programme (2021)

135. The Scottish Government and the Scottish Green Party published the 'Scottish Government and Scottish Green Party Shared Policy Programme' in September 2021. Upon addressing how to respond to the climate emergency, the energy section states that:

*"The Scottish Government and Scottish Green Party believe that the climate emergency means we need to use the limited powers we have to accelerate the decarbonisation of our energy system. While electricity has already been largely decarbonised, our plans will see a significant increase in electricity demand for heating and transport. To accommodate this, we will support the continued and accelerated deployment of renewable energy."*

### CCC Report to Parliament 'Progress in reducing emissions in Scotland' (2021)

136. The Climate Change Committee (CCC) published a report to the Scottish Parliament 'Progress in reducing emissions in Scotland' in December 2021. It looks at Scotland's progress in emissions reduction, policy plans, and delivery of those plans in the last year. The focus is to monitor a set of quantified indicators of decarbonisation progress:
137. The key messages in the report include:
- Changes in emissions accounting methodology do not imply the need to change the Net Zero and 2030 and 2040 interim targets, as legislated by the Scottish Parliament
  - Scotland's annual targets in the 2020s should be adjusted and recommend that the annual targets be adjusted to align with a translation of the legislated 2020 target to the new inventory basis.
  - Meeting the 2030 means that policies must go further than the CCC pathway.

- The 2020 interim target was achieved however the fall in emissions in 2020 was largely due to travel restrictions during the COVID19 pandemic, without which it is unlikely the target would have been met.

#### Draft Energy Strategy and Just Transition Plan (2023)

138. The Draft Energy Strategy and Just Transition Plan was published on 10th January 2023. It sets out the Scottish Government's plan to transform the way Scotland generates, transports and uses energy. This draft Strategy sets out key ambitions for Scotland's energy future including:
- A just transition by maintaining or increasing employment in Scotland's energy production sector against a decline in North Sea production.
  - Maximising the use of Scottish manufactured components in the energy transition, ensuring high-value technology and innovation.

139. It highlights that the following about Battery Storage Systems:

*"Utility scale battery storage offers fast responding, dispatchable power when required. As of September 2021, only 124 MW of the total 864 MW of energy storage was provided by Battery Energy Storage Systems (BESS) capacity installed in Scotland. However, there is a further 2.1 GW that has secured planning permission. Typically, these systems use lithium-ion technology, and only contain energy to dispatch full power continuously for a short number of hours. They also provide a number of ancillary services required to maintain stability within the electricity networks. We urge the UK Government to make these markets more accessible for BESS and other low carbon technologies ahead of fossil fuel powered alternatives."*

## PLANNING ASSESSMENT

140. This section of the Statement contains a detailed analysis of the proposal against the relevant material planning considerations. These considerations have been derived from an understanding of the site and its surroundings and the policy analysis of the previous section.

### Renewable Energy

141. It is evident within NPF4 that energy-related developments play a crucial role in order to achieve the ambitious goals for renewable energy generation on both a national and local level.
142. Page 8 of NPF4 identifies the links between policies, it states:
- “Our strategy and policies support development that helps to meet greenhouse gas emissions targets;*
- The global climate emergency and the nature crisis have formed the foundations for the spatial strategy as a whole. The regional priorities share opportunities and challenges for reducing emissions and adapting to the long-term impacts of climate change, in a way which protects and enhances our natural environment.*
- Policy 1 gives significant weight to the global climate emergency in order to ensure that it is recognised as a priority in all plans and decisions...Policy 11 supports renewable energy development...”*
143. Policy 1 of NPF4 states that proposals should give significant weight to global climate and natural crisis. The policy intent here is to encourage development that addresses the global climate emergency and nature crisis.
144. Key infrastructure, such as the battery storage scheme proposed, plays a crucial role in order to achieve the ambitious goals for renewable energy generation on both a local and national level and address the global climate emergency.
145. Policy 5 of NPF4, criterion b) demonstrates that proposals on prime agricultural land will only be supported where it is for:
- “iv. The generation of energy from renewable sources or the extraction of minerals and there is secure provision for restoration;”*
146. As mentioned above, these proposals are for renewable energy purposes and accordance with Policy 5 b) is therefore provided.
147. Out of all national policies within NPF4, Policy 11: Energy is the ‘go to’ policy, given that it is most specific to the proposals. Policy 11 supports the expansion of renewable, low-carbon and zero emissions technologies. The policy intent here is to encourage, promote and facilitate all forms of renewable energy development.
148. Policy 11 of NPF4, criterion (a) states the following:



*"Development proposals for all forms of renewable, low-carbon and zero emissions technologies will be supported. These include:*

*iii. energy storage, such as battery storage and pumped storage hydro;"*

149. 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.

150. Policy 11 of NPF4, criterion (c) states the following:

*"Development proposals will only be supported where they maximise net economic impact, including local and community socio-economic benefits such as employment, associated."*

151. Therefore, this presents significant opportunities for renewable energy related investment where there would be many socio-economic benefits to the local community, especially the current and future generation as it also helps to address the global climate emergency.

152. The proposed development is assessed against project design and mitigation measures, each of the criteria from Policy 11 (e) and comparable policies within the Local Development Plan.

*i. impacts on communities and individual dwellings, including, residential amenity, visual impact, noise and shadow flicker;*

153. The most directly comparable policy within the Local Development Plan is Policy 67 Renewable Energy Developments. It states that:

*"The Council will support proposals where it is satisfied that they are located, sited and designed such that they will not be significantly detrimental overall, either individually or cumulatively with other developments, having regard in particular to any significant effects on the following:*

- visual impact and impact on the landscape character of the surrounding area (the design and location of the proposal should reflect the scale and character of the landscape and seek to minimise landscape and visual impact, subject to any other considerations);*
- amenity at sensitive locations, including residential properties, work places and recognised visitor sites (in or outwith a settlement boundary);*
- the safety and amenity of any regularly occupied buildings and the grounds that they occupy- having regard to visual intrusion or the likely effect of noise generation and, in the case of wind energy proposals, ice throw in winter conditions, shadow flicker or shadow throw."*

154. Shadow flicker is not considered relevant to the battery storage proposals here, being more relevant to wind developments. As a renewable form of energy storage, battery storage developments do not create any particulate which would impact upon air quality.

*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;

155. The closest policies which would refer to these would be Policy 61: Landscape and Policy 67: Renewable Energy Developments Development in the Landscape. Policy 61 states:

*"The Council would wish to encourage those undertaking development to include measures to enhance the landscape characteristics of the area. This will apply particularly where the condition of the landscape characteristics has deteriorated to such an extent that there has been a loss of landscape quality or distinctive sense of place".*

156. Moreover, Policy 67 reiterates the points highlighted above. It states that:

*"The Council will support proposals where it is satisfied that they are located, sited and designed such that they will not be significantly detrimental overall, either individually or cumulatively with other developments, having regard in particular to any significant effects on the following:*

- *visual impact and impact on the landscape character of the surrounding area (the design and location of the proposal should reflect the scale and character of the landscape and seek to minimise landscape and visual impact, subject to any other considerations)."*

157. The proposal is supported by a Landscape and Visual Assessment (LVA) which is included within this application.

iii. public access, including impact on long distance walking and cycling routes and scenic routes:

158. The closest policies which would refer to these would be Policy 77: Public Access and Policy 67: Renewable Energy Developments Development in the Landscape. Policy 77 states that:

*"For a proposal classified as a Major Development, the Council will require the developer to submit an Access Plan. This should show the existing public, non-motorised public access footpaths, bridleways and cycleways on the site, together with proposed public access provision, both during construction and after completion of the development (including links to existing path networks and to the surrounding area, and access point to water).*

159. Policy 67 states that:

*"The Council will support proposals where it is satisfied that they are located, sited and designed such that they will not be significantly detrimental overall, either individually or cumulatively with other developments, having regard in particular to any significant effects on the following:*

- *the amenity of users of any Core Path or other established public access for walking, cycling or horse riding."*

160. The proposed development includes a Transport Statement with this application. This assessment outlines why access for this project is taken directly from the B9176, avoiding the existing substation access to the north. The Alness Substation access is shared with recreational users such as joggers, dog walkers, horse riders and people looking to fish the

River Averon, and is subject to heavy footfall. Additionally, a further review concluded that visibility was greater at the existing field access due to a vertical curve in the road to the north. The proposed access point has therefore been deemed to be the safest option with minimal impacts upon the existing road network.

iv. impacts on aviation and defence interests including seismological recording;

161. The site is not located in proximity to any military bases. As such, the development will have no impact on aviation and defence interests.

v. impacts on telecommunications and broadcasting installations, particularly ensuring that transmission links are not compromised;

162. No known telecommunication or broadcasting installations are located on site or within the immediate area. The scheme will therefore not compromise telecommunications and broadcasting installations and transmission links.

vi. impacts on road traffic and on adjacent trunk roads, including during construction;

163. The closest policies which would refer to these would be Policy 77: Public Access. Policy 77 reiterates the points highlighted above. It states that:

*"For a proposal classified as a Major Development, the Council will require the developer to submit an Access Plan. This should show the existing public, non-motorised public access footpaths, bridleways and cycleways on the site, together with proposed public access provision, both during construction and after completion of the development (including links to existing path networks and to the surrounding area, and access point to water)".*

164. The proposal is supported by a Transport Statement which is included within this application. As the site will not be manned, operational traffic is expected to be minimal. The impact of this on the local and wider highway network is therefore expected to be negligible.

165. The statement considers that the proposed access arrangement and the construction route are suitable to accommodate the number of construction and operation trips related to the proposed BESS. In summary, it is considered that there are no valid highway or transportation reasons which would prevent the proposed development of this site.

vii. impacts on historic environment;

166. The most directly comparable policies within the Local Development Plan are Policy 57: Natural, Built and Cultural Heritage and Policy 67: Renewable Energy Developments. Policy 57 states that:

*"For features of local/regional importance we will allow developments if it can be satisfactorily demonstrated that they will not have an unacceptable impact on the natural environment, amenity and heritage resource."*

167. Policy 67 highlights that:

*"The Council will support proposals where it is satisfied that they are located, sited and designed such that they will not be significantly detrimental overall, either individually or*

*cumulatively with other developments, having regard in particular to any significant effects on the following:*

- *natural, built and cultural heritage features.”*

168. The proposal is supported by a Heritage Assessment which is included within this application. This assessment concluded a low potential for unknown archaeological remains to exist within the footprint of the development. Additionally, the assessment has not identified anything that would preclude development within the site in relation to cultural heritage. The proposal would be consistent with NPF4 (2023), HEPS (2019) and Ross and Cromarty East Local Plan (2012) and the Highland-wide Local Development Plan (2012).

*viii. effects on hydrology, the water environment and flood risk;*

169. The most directly comparable policy within the Local Development Plan is Policy 66: Surface Water Drainage. Policy 66 states that:

*“All proposed development must be drained by Sustainable Drainage Systems (SuDS) designed in accordance with The SuDS Manual (CIRIA C697) and, where appropriate, the Sewers for Scotland Manual 2nd Edition. Planning applications should be submitted with information in accordance with Planning Advice Note 69: Planning and Building Standards Advice on Flooding paragraphs 23 and 24. Each drainage scheme design must be accompanied by particulars of proposals for ensuring long-term maintenance of the scheme.”*

170. The proposal is supported by a Flood Risk Statement and Drainage Impact Assessment which is included within this application. A flood risk assessment has been undertaken across the site and the site has been deemed at low risk of flooding.

171. An assessment of the drainage options has also been undertaken, and it has been concluded that drainage by infiltration is unlikely to be a viable option. As such, the current proposal is to drain the site via an attenuation basin, with a restricted discharge rate, discharging overland to match its existing drainage condition. Infiltration testing will be undertaken on site prior to detail design, and should acceptable infiltration rates be found, an infiltration solution will be adopted during detail design. The location and condition of land drains will also be determined prior to detailed design to determine if an alternative discharge method can be adopted.

*ix. biodiversity including impacts on birds;*

172. The most directly comparable policies within the Local Development Plan is Policy 58: Protected Species and Policy 67: Renewable Energy Developments. Policy 58 states that:

*“Development that is likely to have an adverse effect, individually and/or cumulatively, on protected bird species (see Glossary) will only be permitted where:*

- *There is no other satisfactory solution; and*
- *The development is required in the interests of public health or public safety.”*

173. Policy 67 states that:

*"The Council will support proposals where it is satisfied that they are located, sited and designed such that they will not be significantly detrimental overall, either individually or cumulatively with other developments, having regard in particular to any significant effects on the following:*

- *species and habitats."*

174. The proposal is supported by an Ecological Impact Assessment which is included within this application.

175. The Ecological Impact Assessment sets out that no significant effects would occur to any of the notable species in the local area (Nova SPA, capercaillie population, nor the Alness River Valley SSSI, bats, red squirrel or pine marten population). Additionally, the energy storage project would deliver a net gain for biodiversity, and would accord with local and national policy.

*x. impacts on trees, woods and forests;*

176. The closest policies which would refer to these would be Policy 51: Trees and Development in the Landscape. Policy PV6 states:

*"The Council will support development which promotes significant protection to existing hedges, trees and woodlands on and around development sites. The acceptable developable area of a site is influenced by tree impact, and adequate separation distances will be required between established trees and any new development. Where appropriate a woodland management plan will be required to secure management of an existing resource."*

177. The proposal is supported by a Landscape and Visual Assessment (LVA) which is included within this application.

*xi. proposals for the decommissioning of developments, including ancillary infrastructure, and site restoration;*

178. The most directly comparable policy with the Local Development Plan is Policy 67: Renewable Energy Developments. It states that:

*"In all cases, if consent is granted, the Council will approve appropriate conditions (along with a legal agreement/obligation under section 75 of the Town and Country Planning (Scotland) Act 1997, as amended, where necessary), relating to the removal of the development and associated equipment and to the restoration of the site, whenever the consent expires, other than in circumstances where fresh consent has been secured to extend the life of the project, or the project ceases to operate for a specific period."*

179. The site is to be decommissioned after 40 years when it is no longer operational and restored its former status.

*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*

180. As mentioned in point above, the site is to be decommissioned after 40 years when it is no longer operational and restored its former status.

xiii. cumulative impacts

181. The most directly comparable policy with the Local Development Plan is Policy 67: Renewable Energy Developments. It states that:
- “the Council will support proposals where it is satisfied that they are located, sited and designed such that they will not be significantly detrimental overall, either individually or cumulatively with other developments, having regard in particular to any significant effects.”*
182. A planning history search has been undertaken which confirms the following energy-related project. The nearest related works associated with Renewable Energy is highlighted below:
- **22/O5167/FUL** - Battery energy storage facility comprising access track, compound of battery and electrical equipment, meter building, stores, fencing, security cameras and landscaping. This project was granted planning permission on 11/12/2023.
183. The scheme will likely result in no cumulative impacts. Nonetheless, a review of the cumulative impacts on construction traffic has been taken into account to understand any impacts of the proposal together with other developments proposed in the area through the Transport Assessment. Where necessary or reasonably practicable, coordination of construction schedules and deliveries will be completed to minimise impact.
184. Overall, the above assessment confirms the proposed development fully accords with the criteria of NPF4 Policy 11 with the Local Development Plan. The Local Development Plan underlines that:
- “The Council will expect developments to benefit from the local community and contribute to the wellbeing of the Highlands, whilst recognising wider national interests. The Council will seek to enter into agreements with developers as appropriate on behalf of local communities for environmental and socio-economic purposes.”*
185. Although the LDP mentions it would be in favour for renewable energy-related development, NPF4 arguably would have significant weight as it is able to address and expand on renewable energy development in more detail and lists battery storage as a form of renewable technology that would be accepted.
186. Moreover, NPF4 addresses the global climate emergency and nature crisis by encouraging these types of developments. The principle of battery storage development is therefore acceptable, and the proposed development will contribute significantly to the renewable energy ambitions and targets.

## Site Selection Methodology

187. This section outlines the applicant’s site selection methodology, which is based on a series of criteria/tests for determining the suitability of land for BESS development. The application site was tested against these criteria before it was selected.

### Fundamental Requirements

188. There are a number of fundamental considerations for the applicant to understand whether a development of this type can be accommodated on the land as set out within this section.

#### **Viable Grid Connection**

189. The energy storage development needs to be capable of connecting to the Electricity Network at a location where there is existing capacity. As highlighted earlier, it is proposed to connect the BESS to the nearby Scottish & Southern Electricity Networks (SSEN) Alness Substation. The site is in close proximity to this substation. Thus, the benefits that would flow from this proposal are viable.
190. The applicants have a grid agreement of up to 45MW where the proposed project will connect to the Alness Substation. A cable route will be subject to further consideration by SSEN and will be subject to a separate application.

#### **Proximity to substation**

191. Energy storage facilities need to be located as close as possible to the substation from which its grid connection is provided in order to limit electrical losses and ensure greater efficiency of the system. The distance between potential energy storage sites and the nearest suitable grid connection is often a major barrier to the deployment of renewable and low carbon energy due to the high costs involved. The longer the distance, the higher the cost and more significant are the losses, rendering many projects unviable.
192. Identifying land as close as possible to the nearby electrical substation was therefore the second step in selecting this particular site. This is a key factor in the choice of location for the proposed development.

#### **Availability of Land**

193. An energy storage facility of this capacity generally requires an area of land of at least 6 hectares to accommodate the batteries and supporting electrical infrastructure. Land of this size, as close to the substation as possible, which is free from other development and obtainable from a third-party landowner is required. Additional space for drainage, landscaping and access is also required.
194. The selected site provides ample space for a storage development of this size and is free from any other forms of current or future development.

#### **Environmental and policy constraints**

195. Energy storage facilities, where possible, should avoid being sited on land which are designated for landscape, heritage, ecological or other environmental reasons, or on land where development is restricted by local planning policy. This particular site has been chosen as it is not located within any statutory designated areas.

#### **Other considerations**

196. When a site with all the previous factors considered has been identified, several other environmental and technical constraints must be assessed. These include, but are not limited to:

- Proximity to existing overhead lines and underground utilities
- Ground conditions
- Distance to nearest residential properties
- The existence of any protected species
- The flood risk status of the site
- Ease of access

197. This specific site has therefore undergone rigorous assessment to ensure that it is suitable to accommodate the development of an energy storage facility. Given the unique locational advantage of the site, in close proximity to an existing electrical substation with an available grid connection, and lack of sensitive receptors in the immediate vicinity, the site is therefore considered particularly suitable for this type of development.

## **Landscape & Visual**

198. The proposed development was assessed earlier against project design and mitigation measures from each of the criteria from Policy 11 (e).

199. The proposal is supported by a Landscape and Visual Assessment (LVA) which is included within this application. The proposed development complies with the requirements of the statutory Development Plan and will not unacceptably impact the landscape character of the area.

## **Ecology**

200. The proposal is supported by an Ecological Impact Assessment (EclA) which is included within this application. The proposed development complies with the statutory Development Plan where measures have been proposed to protect the overall biodiversity of the site.

## **Noise**

201. Policy 23 of NPF4, criterion e) states that:

*"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."*

202. As mentioned above, the proposal is supported by a Noise Assessment which is included within this application. The Noise Assessment demonstrates that the proposed development complies with the requirements of the statutory Development Plan.



## Heritage

203. Policy 7 of NPF4, criterion h) and j) demonstrate the need to protect and enhance historic environment assets and to enable positive change for the regeneration of places:
- "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;*
204. The proposal is supported by an Archaeology and Built Heritage Assessment which is included within this application. The proposed development complies with the statutory Development Plan and would not adversely affect the setting of the identified assets, and, in turn, their historic significance, appreciation and understanding would not be negatively impacted.

## Transport

205. Policy 13 of NPF4, criterion d) and f) prioritises the need to travel unsustainably and closely monitor how travel will be facilitated:
- "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;*
- 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."*
206. The proposal is supported by a Transport Statement which is included within this application. A Transport Assessment is being prepared and submission of this report is to follow. The Transport Statement demonstrates that the proposed development complies with the requirements of the statutory Development Plan.

## Fire Risk

207. A separate Fire Risk Statement has been included in this application (see document Contullich – Fire Risk). This covers design factors such as equipment spacing, protection systems, access to battery enclosures, location, and access for emergency services.

## Flood Risk & Drainage

208. Policy 22 of NPF4, criterion a) prioritises the need to travel unsustainably and closely monitor how travel will be facilitated:

*"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;*

*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."*

209. The proposal is supported by a Flood Risk Assessment which is included within this application. This demonstrates that the proposed development complies with the statutory Development Plan and will not unacceptably pose any significant risks.

## Planning Balance

210. In the event of any incompatibility between a provision of NPF4 and a provision of an LDP, whichever of them is the later in date is to prevail (Town and Country Planning (Scotland) Act 1997; section 24(3)). Provisions that are contradictory or in conflict would be likely to be considered incompatible.

211. The statutory Development Plan is comprised of:

- National Planning Framework 4 (adopted 13 February 2023);
- Highland-wide Local Development Plan (adopted 5 April 2012)

212. This assessment has found no incompatibility in relation to this proposal. The main implication of NPF4 is the clarification of significant weight being given to renewable energy schemes, such as this. This quantification of weight being an obvious and clear change from the previous NPF.

213. Importantly, this assessment has not found any conflict with any Development Plan policy, consequently the scheme should be found acceptable. NPF4 has a strong policy support and has a clear intent to address the effects of climate change and the nature crises. The ability to then apply significant weight upon this proposal, in combatting the effects of climate change and cutting Greenhouse Gas Emissions would thus make the application even more acceptable. In the event that any conflict against development plan policy was found, it is considered that the benefits of this proposal more than outweigh any such harm.

214. A number of key renewable energy government policies and legislation are material considerations in the determination of these proposals. Thus, it is crucial to understand how the statutory Development Plan and key government policies/legislation should be considered.
215. The Update to the Climate Change Plan (2018–2032) ‘Securing a Green Recovery on a Path to Net Zero’ recognises a growing and increasingly decarbonised electricity sector is critical to enabling other parts of our economy to decarbonise – notably transport, buildings and industry.
216. The Draft Energy Strategy and Just Transition Plan published in 2023 focuses on energy security in light of recent global events and the need to reduce dependency on oil and gas and fast track towards Net Zero by 2045. Focus is placed on generating more than 20GW of additional renewable energy alongside other technologies, including additional energy storage capabilities. The Strategy identifies that utility scale battery storage offers fast responding, dispatchable power when required and provides services required to maintain stability within the electricity networks.
217. As is evident within NPF4, there is a step change in the significant weight to be applied to the achievement of targets and renewable energy deployment. The urgent need for renewable energy to tackle the declared Climate Emergency as a material consideration in the determination of planning applications is established by a range of extant Government policies on energy and statutory development plan alongside the suite of national and international legislation which has informed the policy context.
218. NPF4 identifies that these proposals are a national development and thus garner policy strength toward their principle of development.
219. It is evident that there has been a persistent underachievement of renewable energy/greenhouse gas reduction targets over a considerable period of time. As more time passes, the imperative to do more and to be more radical in decision making increases at a greater rate.
220. This must be seen in the growing context of a growing market for electricity as it displaces fossil fuels for transport, commerce, and heat. Sustainable economic growth can only be achieved by ensuring enough energy, which must be produced in line with obligations to reduce greenhouse gas emissions.
221. Measuring against the targets set out within The Climate Change (Emissions Reduction Targets) (Scotland) Act 2019, where Ministers “must ensure” that the net Scottish emissions account for the net-zero emissions target year (i.e., 2045) is at least 100% lower than the baseline. The interim targeting being:
- 2018 is at least 54% lower than the baseline,
  - 2019 is at least 55% lower than the baseline
  - 2020 is at least 56% lower than the baseline,
  - 2030 is at least 75% lower than the baseline,
  - 2040 is at least 90% lower than the baseline, and

- 2045 is at least 100% lower than the baseline.
222. The targets within the Climate Change 2019 Act flow through to the Planning Act 2019, with the purpose of planning being the need to act in the long-term public interest and considering sustainable development.
223. The achievement of Net Zero by 2050 is clearly a long-term public interest and planning proposals for sustainable development that helps meet that objective (such as this application) must be considered in that context.
224. NPF4 evidently underlines this theme, clearly stating that:
- “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. Generation is for domestic consumption as well as for export to the UK and beyond, with new capacity helping to decarbonise heat, transport, and industrial energy demand. 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 from new on and offshore capacity to consumers in Scotland, the rest of the UK and beyond. Delivery of this national development will be informed by market, policy and regulatory developments and decisions”.*
225. The Committee on Climate Change (CCC) published their advice on the UK’s sixth Carbon Budget ‘The UK’s Path to Net Zero’ in early December 2020. It builds on the previous CCC advice to Government in relation to new zero.
226. Although the CCC Report recognises that the main policy levers are held by the UK Government it states at Para 23 that “UK climate targets cannot be met without strong policy action across Scotland, Wales and Northern Ireland” and that Scotland can take action through complementary measures at the devolved level.
227. The CCC is clear in setting out that new demand for electricity will mean that electricity demand will rise 50% to 2035 and “doubling or even trebling by 2050”. The CCC advice sets out that reducing emissions and meeting the budget requires action across various areas including expansion of low carbon energy supplies.
228. Page 29 sets out recommendations for action including “delivering the actions required in the 2020s to meet the Sixth Carbon Budget requires policies to be strengthened now. Matching strong ambition with action is vital for the UK’s credibility...”
229. For Scotland, the CCC have advised that the interim target for 2030 (i.e. a reduction by at least 75% against baseline levels) will be “extremely challenging”. The proposed development would make a direct contribution to achieving renewable energy generation targets in the UK and would support Scottish Government policy to encourage more electricity generation from renewable sources, to secure greenhouse gas reductions and to attain energy security of supply. Noting that the targets are presently being missed, the



imperative to reach those targets, particularly over the next decade (to 2030) is ever more challenging.

## **Public Consultation**

- 230. As highlighted in Section 3, the Town and Country Planning (Hierarchy of Developments) (Scotland) Regulations 2009 underlines that the construction of an electricity generating station where the capacity is or exceeds 20MW is classed as a Major Development.
- 231. A Pre-Application Consultation (PAC) is a statutory requirement for major developments and is undertaken in accordance with procedures set out in the Town and Country Planning (Scotland) Act 1997.
- 232. The proposal is supported by a Pre-Application Consultation Report which is included within this application to detail the public consultation process.

## CONCLUSIONS

233. This statement has been prepared in order to accompany an application for planning permission submitted to the Highland Council, for the construction and operation of a Battery Energy Storage System (BESS), located Land South of the B9176 Struie Road, the nearest postcode is IV17 OYA. The site is located c.1km north of the town of Alness, Scotland.
234. The site near Alness would provide a significant amount of flexibility to the grid and at 45 MW. A variety of international, national, and local policy requires a dramatic increase in battery storage if carbon emissions are to be reduced through more renewable energy generation being connected to the grid.
235. The proposed development fully accords with all the relevant criteria of NPF4 Policy 11: Energy. NPF4 manages to address the global climate emergency and nature crisis by encouraging these type of developments. The principle of battery storage development is therefore acceptable, and the proposed development will contribute significantly to the renewable energy ambitions and targets.
236. It is understandable that there will be some concerns with the proposed development's sensitive receptors such as nearby residences. Nonetheless, any impact of the proposed development are considered to be minimal, with there being no significant impact on: heritage, noise, landscape, flood risk and ecology, with relevant assessments having been undertaken.
237. Overall, the proposal is supported by a number of assessments as mentioned in Section 6. The key features in support of the proposed development are summarised below:
- It complies with the requirements of under the Town and Country Planning (Scotland) Act 1997, statutory Development Plan, and a number of material considerations;
  - It is designed to support the flexible operation of the grid network and will provide a significant contribution to a variety of important services to National Grid;
  - It enables the decarbonisation of electricity supply in support of EU targets and national planning policy;
238. It is therefore requested that The Highland Council grant planning permission for this crucial development without delay.

# Expertly Done.

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