

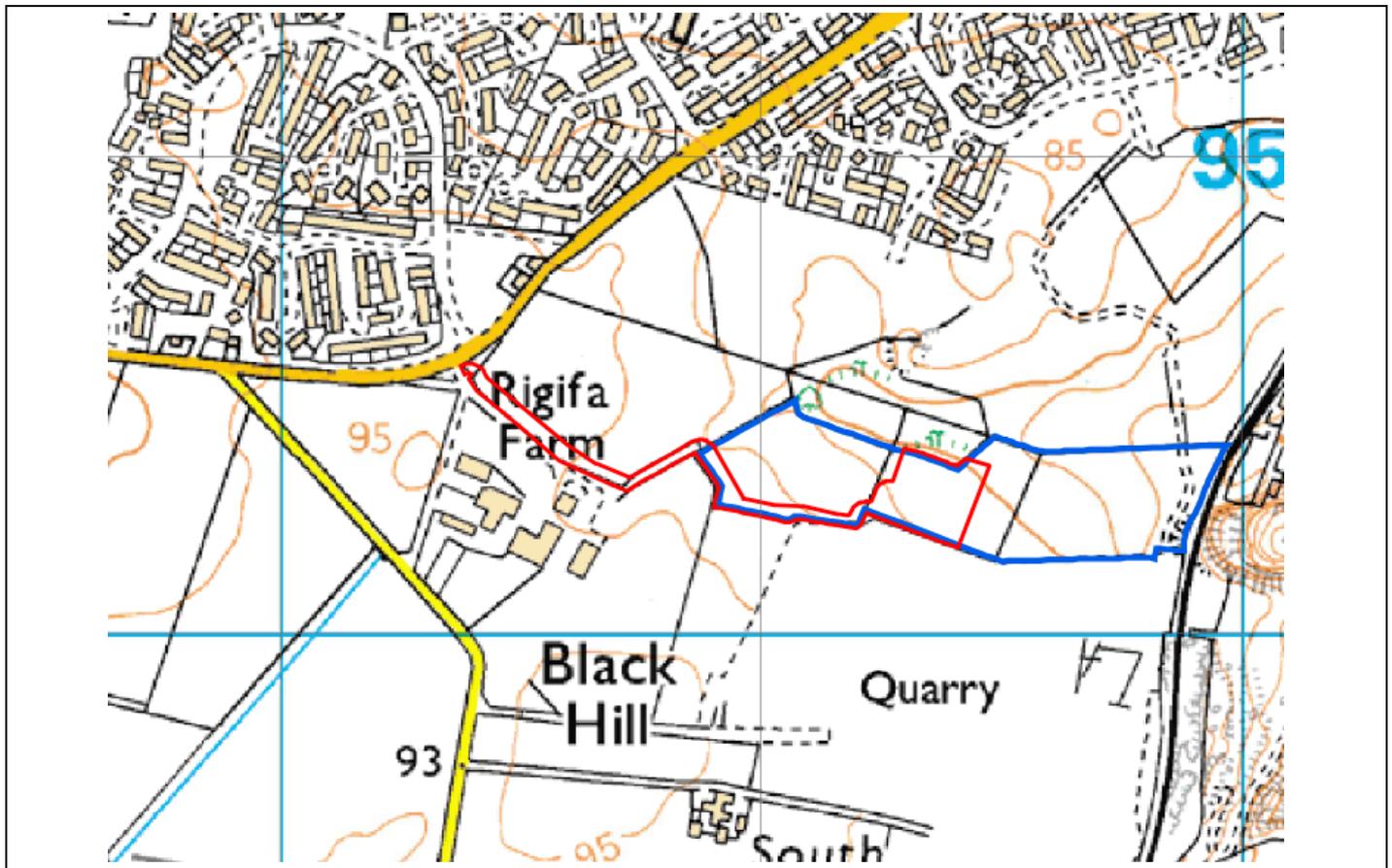


Pre-Application Forum

Report by Development Management Manager

Meeting Date: 24th August 2023

Site Address:	Land at Rigifa Farm, Cove Road, Aberdeen, AB12 3LR
Description of Proposal:	Proposed battery storage units with associated infrastructure, control and switch building, containers and associated works including access
Notice Ref:	230397/PAN
Notice Type:	Proposal of Application Notice
Notice Date:	30 March 2023
Applicant:	Sustainability Unlimited LLP
Ward:	Kincorth/Nigg/Cove
Community Council:	Cove And Altens
Case Officer:	Gavin Clark



RECOMMENDATION

It is recommended that the Forum –

- a) note the key issues identified;
- b) if necessary seek clarification on any particular matters; and
- c) identify relevant issues which they would like the applicants to consider and address in any future application.

APPLICATION BACKGROUND

Site Description

The application site extends to approximately 13000sqm and is located within the green belt to the immediate south of the settlement of Cove (approximately 130m) and to the immediate north of Blackhills Quarry. The surrounding area is fairly open in nature and slopes gradually from west to east eventually leading toward the North Sea, to the east. A community woodland is located to the north of the site along with a reservoir.

Relevant Planning History

None

APPLICATION DESCRIPTION

Description of Proposal

The Proposal of Application Notice relates to the installation of battery storage units with associated infrastructure, control and switch building containers and associated works, including access. No site layout plan has been submitted, but the supporting documents indicate that the development would consist of multiple units totalling 49.9 megawatts, with the connection to the substation via a 300m long underground cable. Access would be via the existing entrance to the offices associated with Blackhills Quarry.

MATERIAL CONSIDERATIONS

Legislative Requirements

Sections 25 and 37(2) of the Town and Country Planning (Scotland) Act 1997 require that where making any determination under the planning acts, regard is to be had to the provisions of the Development Plan; and, that any determination shall be made in accordance with the Development Plan, so far as material to the application, unless material considerations indicate otherwise.

Development Plan

National Planning Framework 4

National Planning Framework 4 (NPF4) is the long-term spatial strategy for Scotland and contains a comprehensive set of national planning policies that form part of the statutory development plan. The relevant provisions of NPF4 that require consideration in terms of this application are –

- Policy 1 (Tackling the Climate and Nature Crises)
- Policy 2 (Climate, Mitigation and Adaptation)
- Policy 3 (Biodiversity)

- Policy 4 (Natural Places)
- Policy 5 (Soils)
- Policy 8 (Green Belt)
- Policy 11 (Energy)
- Policy 13 (Sustainable Transport)
- Policy 14 (Design, Quality and Place)
- Policy 22 (Flood Risk and Water Management)
- Policy 23 (Health and Safety)

Aberdeen Local Development Plan (2023)

The following policies are relevant –

- OP55 (Blackhills Quarry)
- Policy D1 (Quality Placemaking)
- Policy D2 (Amenity)
- Policy D4 (Landscape)
- Policy NE1 (Green Belt)
- Policy NE2 (Green and Blue Infrastructure)
- Policy NE3 (Natural Heritage)
- Policy R7 (Renewal and Low Energy Developments)
- Policy WB3 (Noise)

PRINCIPLE OF DEVELOPMENT

Principle of Development

Policy 11 (Energy) of National Planning Framework 4 (NPF4) expresses support for all forms of renewable, low-carbon and zero emissions technologies, including battery energy storage systems. The Policy goes on to state that:

- Development proposals will only be supported where they maximise net economic impact, including local and community socio-economic benefits such as employment, associated businesses and chain supply opportunities.
- In addition, project design and mitigation will demonstrate how the following impacts are addressed:
 - impacts on communities and individual dwellings, including, residential amenity, visual impact, noise and shadow flicker.
 - 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.
 - public access
 - impacts on aviation and defence interests including seismological recording.
 - impacts on road traffic and on adjacent trunk roads, including during construction.
 - effects on hydrology, the water environment and flood risk.
 - biodiversity including impacts on birds.
 - proposals for the decommissioning of developments, including ancillary infrastructure, and site restoration.
 - the quality of site restoration plans including the measures in place to safeguard or guarantee availability of finances to effectively implement those plans, and cumulative impacts.

In considering these impacts, significant weight will be placed on the contribution of the proposal to renewable energy generation targets and on greenhouse gas emissions reduction targets.

In addition to the above, Policy R7 (Renewable and Low Energy Developments) of the Aberdeen Local Development Plan 2023 (ALDP 2023) states that *“renewable and low carbon energy schemes will be encouraged and supported in principle, where the technology can operate efficiently, and the environmental and cumulative impacts can be satisfactorily addressed”*. Of the relevant criteria that the policy contains, it goes on to explain that proposals are required *“to not – cause significant harm to the local environment, including landscape character and the character and appearance of listed buildings and conservation areas; or have a significant adverse impact on the amenity of dwellinghouses”*.

In addition, Policy 1 (Climate and Nature Crises) of NPF4 requires decision makers to give significant weight to the global climate and nature crises when considering nature proposals. Battery storage would support Scotland’s transition to renewable energy, a major part of addressing climate change. The proposal would therefore attract support from this policy.

Policy 2 (Climate Mitigation and Adaptation) of NPF4 requires development proposals to be designed and sited to minimise lifecycle greenhouse gas emissions as far as possible, and to adapt to current and future risks from climate change and Policy 3 (Biodiversity) of NPF4 requires proposals for local development *“to include appropriate measures to conserve, restore and enhance biodiversity, in accordance with national and local guidance. Measures should be proportionate to the nature and scale of development.”*

Policy 4 (Natural Places) of NPF4 advises *“Development proposals which by virtue of type, location or scale will have an unacceptable impact on the natural environment, will not be supported.”* Policy 5 (Soils) advises that: *“Development proposals will only be supported if they are designed and constructed: (i) In accordance with the mitigation hierarchy by first avoiding and then minimising the amount of disturbance to soils on undeveloped land; and (ii) in a manner that protects soil from damage including from compaction and erosion, and that minimises soil sealing.”*

Land Use Zoning

The site is zoned as Green Belt in the ALDP 2023. NPF4 Policy 8 (Green Belts) applies and has the aim of encouraging, promoting and facilitating compact urban growth and use the land around our towns and cities sustainably. More specifically, development proposals will only be supported if they fall into one of the categories listed and particular requirements are met. In the case of the current proposal, it would likely fall into the category of *“minerals developments and renewable energy developments”*. Battery storage could potentially be considered as essential infrastructure or as a renewable energy development. That being said, it is not entirely clear that the energy stored at the site would be generated in a renewable way, rather than being generated from traditional power stations. Further information will be needed from the applicant in this regard, in form of a supporting planning statement submitted with a future planning application to determine whether this part of policy would support the development.

The second element of Policy 8 of NPF4 requires the following to be demonstrated –

1. why a green belt location is essential and why it cannot be located on an alternative site out with the green belt
2. the purpose of the green belt at this location is not undermined
3. the proposal is compatible with the surrounding established countryside and landscape character

4. the proposal has been designed to ensure it is on an appropriate scale, massing and external appearance, and uses materials that minimise visual impact on the green belt as far as possible; and
5. there will be no significant long-term impacts on the environmental quality of the green belt.

Policy NE1 (Green Belt) of the ALDP 2023 advises that “development in areas defined as Green Belt on the Proposals Map will not be supported. Exceptions to this general presumption will only be supported where the proposal... is related to the generation of renewable energy (wind turbine, solar farm or hydro scheme) and/ or heat”.

It is also noted that part of the site bounds OP55 (Blackhills Quarry), where planning permission was granted in 2013 to continue hard rock extraction and processing. Any proposals would therefore need to ensure that they had no adverse impact on the operation of the quarry.

Layout, Siting and Design

In terms of design, Policy 14 (Design, Quality and Place) of NPF4 requires development proposals to be designed to improve the quality of an area whether in urban or rural locations and regardless of scale. Development proposals that are poorly designed, detrimental to the amenity of the surrounding area or inconsistent with the six qualities of successful places, will not be supported.

Policy D1 advises that all development must ensure high standards of design and have a strong and distinctive sense of place which takes into account the context of the surrounding area and will require to offer opportunities for connectivity which take account the character and the scale of development. Developments that contribute to placemaking will help sustain and enhance the social, economic, environmental and cultural attractiveness of the city. Proposals will be considered against six essential qualities: distinctive, welcoming, safe and pleasant, easy to move around, adaptable and resource efficient.

Policy D2 (Amenity) of the ALDP 2023 also seeks that “development will be designed to: ensure that external lighting minimises light spillage into adjoining areas and the sky.”

Policy D4 (Landscape) of the ALDP 2023 outlines that new developments will have a strong landscape framework that improves and enhances the setting and visual impact of the development, unifies urban form, provides shelter, creates local identity, and promotes biodiversity. To secure high quality development, new development should include a landscape strategy and management plan incorporating hard and soft landscaping design specifications. The level of detail required will be appropriate to the scale of development.

Policy NE2 (Green and Blue Infrastructure) of the ALDP 2023 advises that Development proposals will seek to protect, support and enhance the Green Space Network. This broadly encompasses the wildlife, biodiversity, ecosystem services & functions, access, recreation, landscape and townscape value of the Green Space Network. Development that does not achieve this will not be supported.

Noise

Policy 23 (Health and Safety) of NPF4 indicates 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.”*

Policy WB3 (Noise) of the ALDP 2023 requires that there will be a presumption against noise generating developments, being located to noise sensitive developments, such as existing or

proposed housing, with suitable mitigation measures in place to reduce the impact of noise to an acceptable level.

Transport

Policy T2 (Sustainable Transport) of the ALDP 2023 advises that *“new developments must demonstrate that sufficient measures have been taken to minimise traffic generated and to maximise opportunities for sustainable and active travel.”*

Health and Safety

Policy 23 (Health and Safety) of NPF4 aims to protect people and places from environmental harm and mitigate risks arising from safety hazards. The Planning Service is aware of concern surrounding battery storage and their associated fire risk, as well as recent incidents with such facilities in the UK and abroad. Therefore, as part of any planning application the applicant has been asked to submit details of the measures which would be employed to mitigate such a risk.

Flooding and Drainage

Policy 22 (Flood Risk and Water Management) of NPF4 and Policy NE4 (Our Water Environment) of the ALDP 2023 relate to surface water drainage and in summary require all new developments to incorporate Sustainable Urban Drainage Systems (SUDS) to manage surface water; presume no surface water connection to the combined sewer; and to minimise the area of impermeable surface.

PRE-APPLICATION CONSULTATION

In terms of pre-application consultation, the applicants advised that two in person public consultation events were to take place, along with an online event. The Planning Service responded to the Proposal of Application Notice advising that local Councillors should be advised of the event, providing further guidance on the details of the proposed online event, and identify neighbouring properties which should be advised of the event and local premises where details of the proposed events should be advertised.

NECESSARY INFORMATION TO SUPPORT ANY FUTURE APPLICATION

As part of any application, the applicant has been advised that the following information would need to accompany the formal submission –

- Design and Access Statement
- Drainage Assessment
- Noise Assessment
- Planning Statement
- Pre-Application Consultation Report

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