

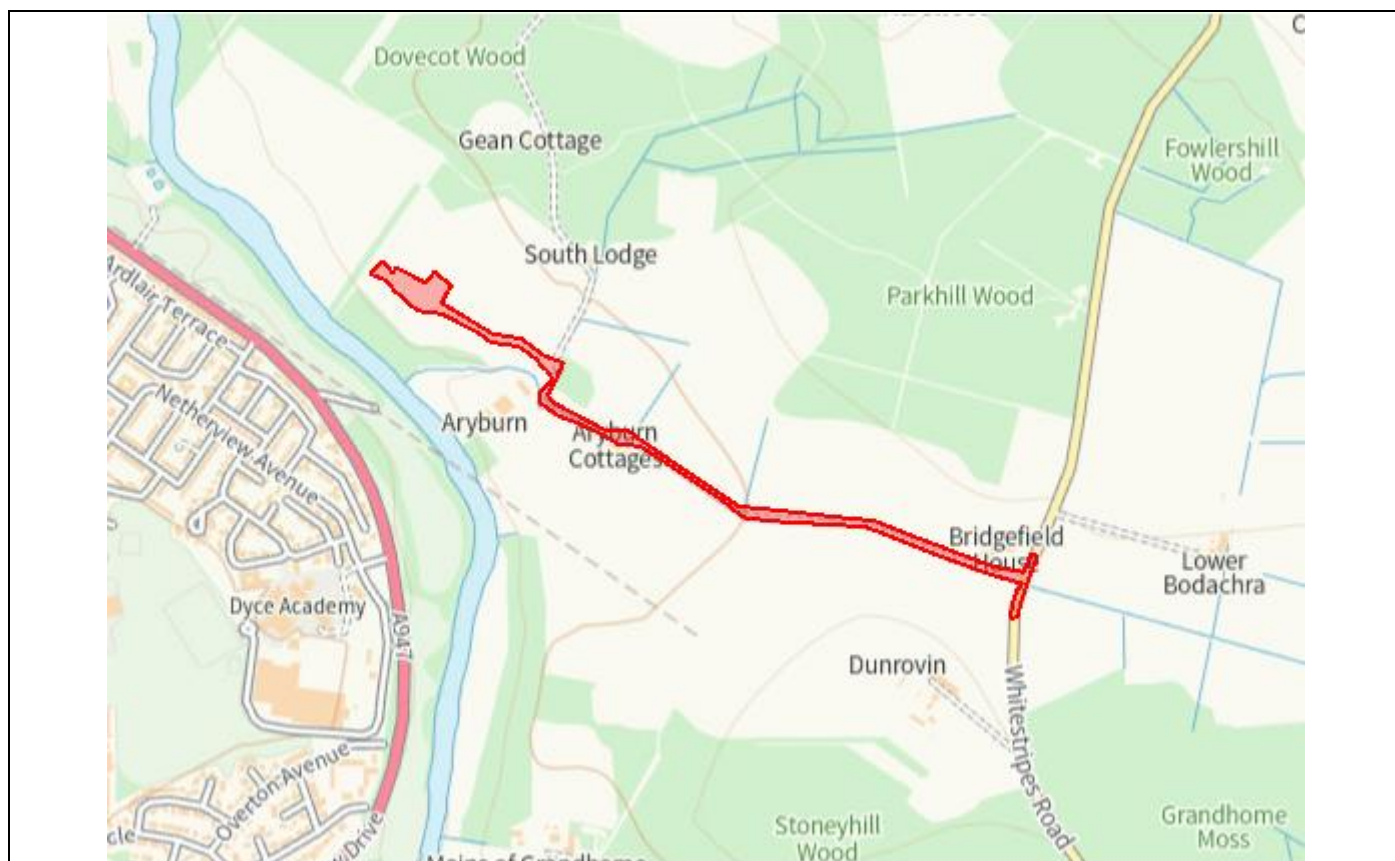


Planning Development Management Committee

Report by Development Management Manager

Committee Date: 6th November 2025

Site Address:	Land North of Aryburn Farm, Dyce, Aberdeen, AB21 0HS
Application Description:	Erection of battery storage units with associated infrastructure, control building, switch room, inverter containers, lighting, fencing and associated works including access road
Application Ref:	241197/DPP
Application Type	Detailed Planning Permission
Application Date:	10 October 2024
Applicant:	Source Galileo Limited
Ward:	Dyce/Bucksburn/Danestone
Community Council:	Dyce and Stoneywood



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RECOMMENDATION

Refuse

APPLICATION BACKGROUND

Site Description

The site relates to an open agricultural field and associated access road extending to approximately 1.8 hectares (noting that the area on which the facility would sit is significantly smaller than this). The main part of the development site is located approximately 975 m to the west of Whitestripes Road and approximately 1 km to the east of the A947; the settlement of Dyce is located approximately 210 m to the south, separated by commercial woodland and the River Don. The surrounding area on the northern side of the river is predominantly agricultural and wooded in nature but does include a number of residential properties including South Lodge and Gean Cottage located to the north, along with the Parkhill Estate. A grouping of farm buildings and an associated farm cottage (Aryburn Farm) are located to the south-east and a number of additional residential properties are located along the access road to the site.

Relevant Planning History

- 221557/ESC - A Screening Opinion was issued in January 2023 advising that an Environmental Impact Assessment would not be required in relation to a development comprising the erection of containerised battery storage units, control building, switch room, inverter containers, lighting and associated works.
- 230869/PAN – A Proposal of Application Notice was submitted in August 2023 for proposed battery storage units with associated infrastructure, control and switch building, containers and associated works including access. The Planning Authority responded advising that further consultation was required.

APPLICATION DESCRIPTION

Description of Proposal

The proposal seeks detailed planning permission for the construction of a grid scale battery energy storage system (BESS) with a capacity of up to 49.9 megawatts. The facility would consist of the siting of containers which would each house batteries together with inverters and electrical transformers, substation buildings, fencing and new planting. The development would be served by a road which also serves a number of residential properties and Aryburn Farm at its junction with Whitestripes Road. The equipment would comprise:

- 28 battery energy storage containers (8.5 metres x 4 metres) covering a total area of 952 square metres.
- 14 battery unit panels (1.9 metres x 0.8 metres) covering a total area of 88.5 square metres.
- 14 power conversion system kiosk units (3 metres x 2.2 metres) covering an area of 92.4 square metres.
- 7 ring main unit containers (6 metres x 3 metres) covering an area of 126 square metres.
- 1 customer compound (17.2 metres x 15 metres) covering 258 square metres.
- 1 district network operator compound (15 metres x 15.3 metres) covering an area of 258 square metres.

The BESS facility would be enclosed by 2.4 metre high palisade fencing (which would include landscaping around its boundary). The proposals would also include four close circuit television

cameras (maximum height of 4 metres – excluding the lighting) along with lighting which would only be activated if a person was within the compound.

The proposals are to utilise the existing access from Whitestripes Road along with a new access from the edge of the road to the compound, a length of around 240 metres. The applicant has also proposed widening of this road in parts for access reasons along with the provision of passing places. The access road would generally measure 4 metres wide and would involve around 300 millimetres of excavation.

The proposed development would be used to store excess electricity from the national grid and then release this energy in periods of high demand. Therefore, the development must be connected to the grid and in this instance, it is understood that the development's grid connection would be via the existing substation at the Dyce Grid Supply Point located around 1.2 kilometres to the north-west (as the crow flies) and around a minimum of 1.5 kilometres when taking into account land conditions and the River Don. It is anticipated that the connection would be via existing land and the existing road, however this information has not been formally submitted as part of the planning application. It should be noted that if the cable were to be located underground it may be deemed permitted development under the provisions of the Town and Country Planning (General Permitted Development) (Scotland) Order 1992 if installed by a statutory undertaker (such as Scottish and Southern Electricity Networks).

Amendments/ Additional Information

In agreement with the applicant, the following amendments were made to the application:

- Amendments to the layout and design of the structures;
- A number of additional assessments including a Fire Risk Management Plan, Landscape and Visual Impact Assessment, Sequential Impact Assessment, Noise Impact Assessment and responses to consultee comments have been provided along with a number of other supporting documents which were submitted in support of the application;
- A further public consultation event was required due to errors in the original submission.

Supporting Documents

All drawings and supporting documents listed below can be viewed on the Council's website at:

<https://publicaccess.aberdeencity.gov.uk/online-applications/applicationDetails.do?activeTab=documents&keyVal=SL4ZX3BZKFN00>

- Sequential Test Assessment
- Construction Traffic Management Plan
- Cultural Heritage Impact Assessment
- Drainage Impact Assessment
- Ecological Assessment & Biodiversity Management Plan.
- Fire Risk Management Plan
- Landscape and Visual Impact Assessment
- Noise Impact Assessment
- Pre-Application Consultation Report
- Supporting Statement – Land Quality
- Lighting Strategy

Reason for Referral to Committee

The application has been referred to the Planning Development Management Committee because the proposal is in the major category of development in the hierarchy of developments as its capacity exceeds 20 megawatts. Determination of the application therefore falls outwith the scheme of delegation.

Pre-Application Consultation

The applicant undertook statutory pre-application consultation which, firstly, included an advertisement in the Press and Journal on 31 August 2023. Three public consultation events took place on 3 August, 17 September and 21st September 2023 at Dyce Boy's Club. The PAC Report indicated that no members of the public attended these events. There is some confusion in the submitted information as whilst the applicant has indicated that although no persons attended these events, it is stated that the development is being undertaken in line with feedback comments received. Clarification from the applicant was requested on this aspect but no amended document was provided.

The applicant presented to the Pre-Application Forum on 15 May 2024. The Committee asked various questions of the Planning Officer and the applicant and the following information was noted:-

- Cables routes and depth;
- Noise;
- Site selection and setting within the Green Belt;
- Flood risk and hydrology; and
- Biodiversity.

The report recommended that the Forum – (a) note the key issues identified; (b) if necessary, seek clarification on any particular matters; (c) and identify relevant issues which they would like the applicant to consider and address in any future application.

During the course of the planning application it was noted that there were a number of anomalies between the site plan submitted as part of the Proposal of Application Notice and that submitted as part of the formal planning application. Due to this, the planning service required that an additional public consultation event be held by the applicant. This event took place on 10 July 2025 and was attended by a number of those that had made comment on the application, in addition to a local Councillor. No updated PAC report detailing feedback received was provided by the applicant, although an email was provided which confirmed that the applicant presented *“their proposal to upgrade the access road and that attendees welcomed this element, despite their wider reservations about the development”*.

CONSULTATIONS

Aberdeen City Council (ACC) Internal Consultees

- **ACC - Structures, Flooding and Coastal Engineering** – have reviewed the Drainage Impact Assessment and have no comment to make on the proposed development.

- **Archaeology Service (Aberdeenshire Council)** – with the assessment that there are no known archaeological assets being directly impacted by the proposed works, and no setting issues with regard the wider historic landscape. Also note that there is low potential for previously unknown remains to exist within the development boundary, and as such agree with the recommendation of the Cultural Assessment for an archaeological watching-brief to be undertaken on all ground-breaking works during the construction stage. Note that this could be controlled via planning condition.
- **ACC - Developer Obligations** – given that there are no staff to be located on site and the scale of development will create less than 1000 square metres of commercial floorspace it is considered that infrastructure (core paths and open space) would not be impacted to the extent that further mitigation is required in the form of financial contributions.
- **ACC - Environmental Health** – has reviewed the Noise Impact Assessment (Neo Environmental Ltd, 23rd October 2025) submitted in support of the above development and consider it to be reasonable. They therefore accept the proposed development provided:

The Battery Energy Storage System (BESS) comprises the plant (28 battery storage units, 14 PCS and 7 transformers) and layout detailed in the Infrastructure Layout Plan (Document Ref: SCE0001_AryburnBESS_ILA), with A-weighted sound power levels not exceeding those detailed in Table 6-5; and

That prior to construction of the BESS, the warranted sound power levels, number of items and location of the chosen plant shall be checked against the assumptions considered in the assessment and, where the proposed items are found to vary (i.e., in sound power level, location or number), an updated assessment shall be undertaken to confirm that the operational noise levels meet the relevant criteria (noise limits). Confirmed no objection subject to the above being taken into account.

- **ACC - Roads Development Management Team** – have provided the following comments in relation to the application:

Access: note that the site is accessed from an un-adopted track approximately 1 km in length and would generate little traffic and have a negligible impact on the local road network. Also note that the track will be at least 4 m wide to accommodate fire tenders and the applicant will provide suitable passing places along the route, which could be controlled via planning condition. Note that they would reluctantly accept this and any condition should include a commitment to upgrading the surface of the access road and dimensions of passing places in accordance with National Guidance.

All vehicles should be able to enter and exit the site in a forward gear. The swept path analysis (SPA) provided only shows construction vehicles entering from the north (along Whitestripes Road), which owing to this linking to the AWPR is the likely route. The applicant as requested has also provided the SPA of a Fire Tender entering the site from the south which is acceptable.

Also note the site access junction which joins the public road appears to be in a poor condition and will need to be upgraded, which the applicant has agreed to. These works will require Roads Construction Consent (RCC).

The applicant has provided visibility splays using the 85th% speeds of the road as per survey work they have conducted. This is in line with relevant guidance and has been accepted by Roads subject to the applicant replacing the existing bend warning signs with junction on

bend warning signs. A condition should be attached to ensure these works are provided in line with an agreed plan with Roads and completed before the site is operational.

During the construction phase additional Temporary Traffic Management Measures are to be in place. This should be conditioned, along with a requirement to ensure the visibility splays are maintained which may require vegetation maintenance. The construction management plan is required to be agreed with the RCC team in advance of any works.

Other Matters: in terms of parking, they note that there is adequate room for a van to park once the site is operational and that the site is not anticipated to generate any waste. They also note that no water would be permitted to discharge onto the public road and as the site is remote from the public road there are no concerns.

In conclusion, they note that, subject to the provision of the above recommended conditions in any approval, Roads have no objections to this proposal. Their response will be discussed in greater detail in the below evaluation.

External Consultees

- **Aberdeen International Airport** – the development has been examined from an aerodrome safeguarding criteria and does not conflict with safeguarding criteria. They therefore have no objection to the application. Request the insertion of an informative in relation to the use of cranes.
- **Aberdeenshire Council** – have provided comments in relation to the green belt setting of the development, the landscape impact (from an Aberdeenshire perspective), archaeology, environmental impacts and access. They concluded that provided appropriate assessments are undertaken, taking account of receptors within the Aberdeenshire Council area, and no adverse impacts are identified and/or any resultant effects can be suitably mitigated by application of appropriate conditions, then Aberdeenshire Council Planning Service do not require to have any further input to the proposal.

However, should the above assessments not take into account the receptors within the Aberdeenshire Council area or should these assessments identify an adverse amenity impact on these properties, then the Planning Service would request that Aberdeen City Council revert back for further comment on the proposal.

- **Scottish Fire and Rescue Service** – no response received.
- **Dyce and Stoneywood Community Council** – no comments received.

REPRESENTATIONS

In the initial consultation process eleven representations were received (7 objections, 4 in support). The proposals were subject to re-notification on 5 February 2025. All of the original objectors submitted further comments and 1 additional objection was received and 1 further letter of support was received. A third round of neighbour notification was carried out on 23 July 2025 where 1 further objection was received from a party that had originally objected. The matters raised can be summarised as follows –

Material Considerations

Objections

1. The location of the development within the greenbelt, where it has not been demonstrated that a greenbelt location is essential for the proposed development. The site selection process is also not considered to be appropriate.
2. The proposals would set an undesirable precedent for developments of a similar nature.
3. The proposals would result in the loss of prime agricultural land.
4. The proposals would have an adverse impact on wildlife and biodiversity including on herons, bats and badgers. There are also further protected species on site.
5. The area is susceptible to flooding.
6. The proposals would have an adverse visual impact on the surrounding area and would be out of character with the surrounding area.
7. The proposals would have an adverse impact in terms of noise and the construction phase would have an adverse impact in terms of increased traffic, noise, impacts on properties and light pollution along with water contamination.
8. Construction traffic on the access track would have an adverse impact on an individual with a disability.
9. The site design does not follow best practice in that there would be insufficient space for the repair and maintenance of the facility and that a fire appliance would not be able to satisfactorily enter the facility. The proposed access to the site is also unsuitable for the proposed development.
10. Issues in relation to the construction phase of the development, in that it would be difficult for construction traffic to enter the site along the access road, where the 1.4km long track is not suitable for up to 15 HGV movements per day and passes close to existing residential properties. Also note errors in the submitted information where it states the access track is 4m wide, where in places it is a maximum of 2.5m wide.
11. Health and safety concerns. Insufficient drainage measures and mitigation measures for potential contamination of the surrounding area.
12. Missing information including details for the route of the cabling and the energy storage levels of the facility. Further information is required in this regard.
13. The location of the proposed tree planting could result in increased fire risk.
14. Object due to the size of the facility.
15. A full HSE Risk Assessment has not been submitted.
16. Fire risks associated with the proposed development and insufficient information submitted in terms of fire risk.

17. The proposals would have an adverse impact on the quality of life of residents in the surrounding area.
18. Concerns about the pre-application public consultation process, noting that residents did not receive invites to any of the pre-application events.
19. The Sequential Impact Assessment is inadequate in that it states that the need for development areas is 0.94 hectares, whereas the development site area is 0.22 hectares. Considered that there are suitable sites within industrial estates that would meet the criteria for development.

Support:

20. In the current climate of energy production, it is important that such facilities are supported where power production exceeds usage and meeting the net zero targets of the Scottish Government.
21. The proposed battery storage system represents technological innovation that will position Aberdeen City as a leader in modern energy solutions.
22. A reliable energy storage facility will contribute to a stable energy supply which is essential for the local business community.
23. The proposal is the nearest available to the Dyce connection and will cause the least possible disturbance.

Non-Material Considerations

- Issues in terms of land ownership in that the proposals would result in alterations to the road and result in the removal of trees within neighbouring land and there is no permission from the neighbour to alter the access to Whitestripes Road.
- Concerns with the consultation process, noting that 21 days is insufficient to respond to the information submitted.

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 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.

- 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 6 (Forestry, Woodland and Trees)
- Policy 7 (Historic Assets and Places)
- Policy 8 (Green Belts)
- Policy 11 (Energy)
- Policy 12 (Zero Waste)
- 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

- Policy D1 (Quality Placemaking)
- Policy D4 (Landscape)
- Policy D5 (Landscape Design)
- Policy D6 (Historic Environment)
- Policy NE1 (Green Belt)
- Policy NE2 (Green and Blue Infrastructure)
- Policy NE3 (Our Natural Heritage)
- Policy NE4 (Our Water Environment)
- Policy NE5 (Trees and Woodland)
- Policy B3 (Aberdeen International Airport and Perwinnes Radar)
- Policy R7 (Renewable and Low Carbon Energy Developments)
- Policy WB3 (Noise)

Aberdeen Planning Guidance

- Landscape
- Natural Heritage
- Noise
- Transport and Accessibility

Other Material Considerations

- Battery Energy Storage Systems – Research Paper (House of Commons Library)
- Grid Scale Battery Energy Storage System Planning – Guidance for Fire and Rescue Services (National Fire Chiefs Council)
- Health and Safety Guidance for Grid Scale Electrical Energy Storage Systems (Department for Energy Security & Net Zero)
- The National Fire Chiefs Council - Grid Scale Battery Energy Storage System planning – Guidance for FRS

EVALUATION

Background

Renewable energy sources such as wind and solar power rely on the weather to generate electricity. This means that renewables cannot adjust to demand from consumers and businesses as easily as fossil fuels and nuclear power can. Therefore, with the energy system increasingly relying on renewable sources, it will need to be underpinned by technologies that can respond to fluctuations in supply and demand, such as battery energy storage, gas with carbon capture and storage, and hydrogen.

Grid scale battery energy storage systems ('BESS') store the energy that is produced when demand is lower than supply. The energy stored in batteries can be released when there is little wind and sun, to ensure the demand can always be met, a process known as "grid balancing". Without such facilities, excess energy is wasted as any surplus cannot be stored in the electricity network.

The Scottish Government's planning advice on energy storage states that *"A clear case has been made that, if the energy sector is to maximise environmental, economic and social benefits, renewable energy will need to be linked to energy storage. Energy storage technologies can counteract intermittency associated with certain energy supplies, can ensure excess power is not lost at times of high production, can provide energy on demand off-grid in a variety of ways. Oversupply is likely to become more prevalent the closer Scotland gets to realising its 100% electricity from renewables target. It is also expected that energy storage will be essential if Scotland is to realise its ambition to become a renewable energy exporter and to attract the economic advantages of ensuring that the energy storage supply chain locates in Scotland."*

According to the UK Government's Renewable Energy Planning Database, as of October 2025, in Scotland there were 19 operational BESS and 38 BESS that are subject to pending planning applications, awaiting or under construction. Across the UK there are 127 operational BESS and 1,728 have applications submitted, awaiting or under construction or operational.

Principle of Development

Green Belt Designation

The site is zoned as Green Belt where Policy 8 (Green Belts) of NPF4 applies and has the aim of encouraging, promoting and facilitating compact urban growth and use the land around our towns and cities sustainably. Development in the green belt is strictly controlled. For proposals to be supported, they must fall into one or more of the categories of development which are acceptable in the green belt. Thereafter, should they fall into one of these categories, they must also meet a range of other requirements to ensure the integrity of the green belt is retained.

In terms of being an acceptable development type, the proposal falls into two categories of development which are generally permitted in the green belt. The first relates to essential infrastructure, which under Policy 8 is described as *'essential infrastructure or new cemetery provision'* and in Policy NE1 Green Belt of the Aberdeen Local Development Plan 2023 (ALDP) as development that *"is directly associated with essential infrastructure such as telecommunications, electricity grid connections, transport proposals identified in the Plan or roads planned through masterplanning of sites, if they cannot be accommodated anywhere other than the Green Belt"*.

The second category relates to renewable energy, which under Policy 8 is categorised as *'minerals operations and renewable energy developments'* and in Policy NE1 as development that *'is related to the generation of renewable energy (wind turbine, solar farm, or hydro scheme) and/or heat;'*

Given the emphasis placed on achieving net-zero targets and the essential role BESS plays in decarbonising the UK's electricity network, such developments are therefore essential infrastructure and related to renewable energy development. Therefore, with it established that the development is of a type acceptable as an exception within the green belt, the second element of Policy 8 requires a range of other matters to be demonstrated –

1. *why a green belt location is essential and why it cannot be located on an alternative site outwith the green belt;*

The UK's electricity grid is highly constrained and therefore identifying a location where a BESS can be connected to the electricity grid is a challenge. Typically, for a grid scale BESS to be commercially viable it must be located within 2 km of a grid supply point that has available capacity. The greater the distance from the grid supply point, the greater the electricity transmission loss and greater the cost to lay a cable to the connection point. Even within 2 km, viability relies upon there being no significant physical obstacles which would make the laying of a cable between the two locations technically or financially unviable.

In this case, the applicant has indicated that the facility would be connected to Scottish and Southern Electricity Networks Dyce Substation, which serves as a major connection point for the national grid, including power from offshore wind farms and proposed energy storage facilities and which is situated on Cothal View at the northern end of Dyce, approximately 1.2 km to the north west of the application site (as the crow flies) and 1.5 km from the site when taking into account land conditions and the River Don.

At the request of the Planning Authority, the application included a Sequential Impact Assessment (SIA) which was updated on a number of occasions. The SIA identified what the applicant considered to be 29 alternative brownfield, greenfield and green belt sites. This document noted that a number of the sites were discounted for factors such as their green belt setting, surface water and river flooding, topography, proximity to railway lines, site size, local plan designations, cable routes, pylons and electricity lines.

The Planning Service has reservations regarding the rationale used by the SIA for discounting a number of these sites, noting that a number would appear more sequentially preferable and could reasonably accommodate the layout of the proposed development. It should also be noted that there are BESS storage facilities which have been approved within the Dyce area including one at Farburn Terrace (which is currently under construction under permission (210665/DPP) located approximately 1.6 kilometres to the south (as the crow flies) and a further BESS facility approved 780 metres to the west (permission 220026/DPP and currently being renewed by application 250282/S42) on Kirkton Drive within the business and industrial areas, which indicate that such areas would be suitable for a development of this type. It should be noted that site 3 was discounted in the SIA as being unsuitable for development due to the insufficient area of land available, despite consent having been granted for a BESS facility in this location (as referenced above). Furthermore, sites 7-9 are quoted by the SIA as being allocated in the ALDP as B2 (Business Zones) when in fact they are allocated as B1 (Business and Industry) where such a use would generally supported by planning policy.

The SIA also notes at paragraph 2.10 that the *“total ground disturbance from the proposed development is 2218.1 sqm (0.2218 hectares),* whereas the SIA was using a significantly larger site as evidence – where a number of sites would potentially have been of a suitable size. A number of the brownfield sites mentioned above (including sites 7-9) were ruled out for being too small although they measured between 0.3 hectares and 0.45 hectares in size. Other sites were also ruled out as

the proposed cabling would have to traverse the River Don, similar to the application site property and for their green belt setting, similar to the application property.

Given that there are potentially suitable sites within 1 km of the connection point that are on brownfield land zoned for business use, as well as other potentially preferable sites, and that there are inconsistencies in the recommendations of a number of sites within the SIA, it has not been adequately demonstrated by the applicant that a green belt location is essential for the development as proposed and therefore the proposals would be contrary to this first element of green belt policy.

2. the purpose of the green belt at that location is not undermined;

Policy NE1 (Green Belt) of the ALDP states that the aim of the Aberdeen green belt is to maintain the distinct identity of Aberdeen, and the communities within and around the city, by defining their physical boundaries clearly. Safeguarding the green belt helps to avoid coalescence of these settlements and sprawling development on the edge of the city, maintain Aberdeen's landscape setting, and provide access to open space. The green belt directs planned growth to the most appropriate locations and supports regeneration.

The site itself has not been developed previously and is utilised as agricultural land in a typical agricultural setting surrounded by areas of mature woodland. The proposals would introduce an "industrial" style of development to this setting which would have an adverse urbanising effect on the character of the area, resulting in the significant erosion of the rural, agricultural feel and providing a facility that would be at odds with the tranquil setting of the surrounding area, which has not previously seen developments of this type. The proposals would therefore undermine the setting of the green belt in this location and could not be supported.

3. the proposal is compatible with the surrounding established countryside and landscape character;

Policy D4 (Landscape) of the ALDP indicates that development should avoid adversely affecting the character of landscapes which are important for the setting of the city, including the coast, river valleys and hill landscapes.

As stated under point 2, this particular area of green belt is undeveloped and tranquil in nature, surrounded by both areas of woodland and agricultural fields, along with a small number of residential buildings and farm buildings, set within the Parkhill Estate. The site itself is relatively flat and is not visible from Dyce to the south due to the woodland belts. The structures would be seen against the backdrop of the said woodland and would be surrounded by landscaping to lessen the visual impact on the surrounding area. The impact on the wider landscape and visibility in longer range views would be limited due to the containment provided by the woodland but is not outweighed by the significant localised impacts mentioned under point 2. This has included an assessment of the impact from Aberdeenshire receptors, as noted by Aberdeenshire Council in their consultation response.

4. the proposal has been designed to ensure it is of an appropriate scale, massing and external appearance, and uses materials that minimise visual impact on the green belt as far as possible; and

Subject to the previously mentioned mitigation measures (landscaping), the development could be accommodated on site without having an adverse impact on the Green Belt setting and would be also be seen against the backdrop of woodland when viewed from the north/ north-east. Overall, the landscape and visual effects would be localised and limited in nature., but the proposals are unacceptable for the reasons detailed in points 1 and 2 above.

5. *there will be no significant long-term impacts on the environmental quality of the green belt.*

Policy 5 (Soils) of NPF4 is also of relevance and advises that “*development proposals on prime agricultural land, or land of lesser quality that is culturally or locally important for primary use, as identified by the ALDP, will only be supported where it is for: essential infrastructure and there is a specific locational need and no other suitable site*”.

The site is classified under the national scale land capability for agriculture at 3.2 “*land capable of average production though high yields of barley, oats and grass can be obtained. Grass leys are common*”. The applicant has also submitted information which indicates that this particular area of the field, which is of a poorer quality in terms of agricultural production due to its screening by trees and lack of sunlight meaning the area does not readily dry out. The Planning Authority are therefore content that the proposals would not result in the loss of prime agricultural land and there would be no conflict with Policy 5 of NPF4.

Green Belt Summary

The proposal is for a development type which is permitted within the green belt. However, due to its location, the locational requirement has not been justified, it would undermine the principle of the green belt setting, would have an unacceptable landscape impact and there would appear to be more sequentially preferable sites for the proposed development on non-greenbelt land the proposals are contrary to Policy 8 (Green Belts) of NPF4 and Policy NE1 (Green Belt) of the ALDP 2023.

Economic Benefit

Policy 11 (Energy) of NPF4 explains that development proposals will only be supported where they maximise net economic impact, including local and community socio-economic benefits such as employment, associated business, and supply chain opportunities.

Battery energy storage makes an indirect but significant contribution to renewable energy generation targets and greenhouse gas emissions reduction targets, by increasing the productivity of renewable generators elsewhere on the grid. The provision of a secure electricity system brings economic benefits across the national economy. The construction and decommissioning of the development present supply chain opportunities for business and would contribute to local economic activity.

Energy Developments and Design Impacts

As well as supporting energy developments in general, Policy 11 (Energy) of NPF4 expects the design of projects and any associated mitigation measures to demonstrate how the following impacts are addressed. Many of these matters are aimed more towards considering large scale renewable projects, such as wind farms, nonetheless each is considered in relation to this proposal. Policy R7 (Renewable and Low Energy Developments) of the ALDP 2023 also contains such criteria, much of which reiterates that in Policy 11. Where Policy R7 has additional requirements, they are highlighted in the relevant part of the discussion or considered at the end of this section.

In considering all these impacts, Policy 11 requires significant weight to be placed on the contribution of the proposal to renewable energy generation targets and on greenhouse gas emissions reduction targets. The significant weight required to be given to the global climate and nature crises by Policy 1 of NPF4 must also be considered. This substantial support for the principle of the development should not be outweighed by other matters unless it can be demonstrated that significant harm would be caused.

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

In considering these matters, Policy 14 (Design, Quality and Place) of NPF4, Policy D1 (Quality Placemaking and D2 (Amenity) of the ALDP 2023 are relevant and 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.

The site has a fairly open aspect and is relatively agricultural in nature being largely undeveloped and rural in character. The proposals would be industrial in nature and would be viewed against the backdrop of the woodland, which is located to the south.

BESS facilities are considered to have an industrial character and appearance, similar to that of an electricity substation. For the current proposals, the equipment and associated infrastructure would have a height of around 2.7 m and would be enclosed by a 2.4 m high steel palisade fencing along with native screen planting along its north-eastern boundary, which would help to lessen the visual impact of the development from the north.

The main area of the proposals (the compound) are also located a significant distance from residential properties, with those nearest being at South Lodge (280 m to the north-east), Gean Cottage (315 m to the north) and Aryburn Cottages (360 m to the east) and whilst they would be visible to these properties the visual impact (from a residential amenity impact) would be minimal. Impacts on residential amenity from a noise perspective will be covered further below.

The submitted Landscape Visual Impact Assessment considers the visual impact of the development from locations in the wider area (mainly to the south). It determines that there would be little to no visual impact from more distant views. However, the principle of development remains unacceptable, given that a location in the green belt has not been justified and therefore the landscape impact on this setting has also not been justified.

It is also important to note that the test within Policy R7 of the ALDP is that “*proposals will not have a significant adverse impact on the amenity of dwelling houses.*” In this case, although there would be an impact upon visual amenity, it would be relatively minor, rather than being significant. The distance between the site and any surrounding uses ensures there would be no impact on daylight availability or overshadowing. There would be no shadow flicker generated by the BESS.

In terms of noise, the applicants have submitted a Noise Impact Assessment in support of the application, which has been reviewed by colleagues in Environmental Health. This impact will be discussed in greater detail below, but EH have are content that the proposal would have no adverse impact on the amenity of any of the properties in the surrounding area.

The proposals would, therefore, be generally compliant with Policy 23 (Health and Safety) of NPF4, Policies D2 (Amenity), R7 (Renewable and Low Carbon Energy Developments) and WB3 (Noise) of the ALDP 2023 and its associated APG: Noise in respect of this aspect.

- 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.*

As has been discussed elsewhere in the report, the proposed facility would be located on an existing area of agricultural land and would be seen against the backdrop of an area of woodland but as the principle is not acceptable from principle perspective the proposals are not accepted.

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

As operational agricultural land, there is no public access to the site at present, and this would remain the case. The formation of the access road, along with the proposed alterations to the existing road network would have no significant impact on the walking and cycling routes in the long term.

- iv. *impacts on aviation and defence interests including seismological recording.*

The proposals have been subject to consultation with Aberdeen International Airport, who have noted that the proposed development does not conflict with safeguarding criteria and therefore have no objection to the proposed development. If planning permission was approved for the proposed development they have requested the insertion of an informative in relation to the use of cranes. The proposals would not conflict with Policy B3 (Aberdeen International Airport and Perwinnes Radar) of the ALDP 2023.

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

No impacts on telecommunications and broadcasting installations are expected.

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

In terms of the above, it is noted that the access to the site is a rural road, which is narrow in certain sections and would involve a significant number of journeys particularly during the development phase. Whilst colleagues in Roads Development Management (RDM) have not objected to the proposals the Planning Service does have a number of concerns in regard to the proposed route and whether the access road could be adequately upgraded and accessed, in terms of physical space and land ownership. The applicant has submitted evidence that this could be done, and a condition *could* therefore be added to ensure that all necessary upgrade works are carried out prior to the commencement of development. These matters will be discussed in greater detail below.

- vii. *impacts on historic environment.*

The proposal was subject to consultation with Archaeology service, who have reviewed the submitted Cultural Heritage Impact Assessment and agree with its conclusions. They confirmed that no archaeological mitigation works are required ahead of the development and have no further comments to make on the application. The site is not within a conservation area and there are no historic assets, such as listed buildings or scheduled monuments, either within the site or in the immediate surrounding area that would be affected by the proposed development.

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

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.

A Drainage Impact Assessment (DIA) was submitted in support of the application, which noted that a small area of the site has some pluvial and fluvial flooding constraints but would only be utilised for water compatible purposes (the formation of the access track). The drainage strategy for the proposals involves an underground piped system connecting to an attenuation structure to the west of the main battery compound. Finalised details of this could be controlled via planning condition. The DIA indicates that the development would not increase flood risk and Flooding & Coastal Protection are content with the findings of the report. The proposals would therefore be in general compliance with the aforementioned policies.

ix. *biodiversity including impacts on birds.*

Policy 4 (Natural Places) of the NPF4 aims to protect, restore, and enhance natural assets, making best use of nature-based solutions. It states that development proposals which by virtue of type, location or scale will have an unacceptable impact on the natural environment, will not be supported. Policy NE3 (Our Natural Heritage) of the ALDP has similar provisions. In addition, 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.'*

A Biodiversity Management Plan (BMP) was submitted in support of the application along an Ecological Assessment. The Ecological Assessment looked at various aspects and noted that no direct ecology, hydrological or ornithological connectivity exists between the site and any designated sites. Any habitats found on the site are conservation priority habitats and whilst badger presence was found in the surrounding area none were considered to be present on the development site.

The BMP has proposed a number of opportunities including grassland with wildflowers, native species-rich hedgerows with trees, insect hotels and hibernaculum and a hedgehog house, all of which would offer shelter and a food source supporting a variety of wildlife. The recommendations were reviewed and accepted by Natural Environment Policy, who were content with the findings of the report, where implementation of the recommendations could be controlled via an appropriately worded planning conditions were planning permission approved for the proposed development.

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

Existing tree stock is unaffected by the proposed development.

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

The proposals are designed to operate for 25 years, after which they would be removed. The construction works would not require a significant physical intervention (other than those described elsewhere), so their removal would also be a relatively simple process.

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*

Due to the simple reversible nature of the installation, it is not considered necessary to have any site restoration plan. However, a condition could be inserted (were planning permission to be granted) which requires the proposals to be removed once they are no longer operational.

xiii. *cumulative impacts.*

There are no other developments in close proximity (although there are consented developments and others going through the planning process) which in combination with this development would generate any unacceptable impacts.

In addition to the matters covered by both Policy 11 of NPF4 and Policy R7 of the ALDP above, Policy R7 also requires that proposals for all energy developments –

- i. *will not negatively impact on air quality.*

The structures would not emit any emissions and their use in the wider scale would help reduce emissions and in turn air quality from non-renewable energy sources.

- ii. *will not negatively impact on tourism*

There are no tourist activities associated with the site or surrounding area.

In relation to such development specifically, Policy R7 requires proposals to meet the following requirements –

- i. *consideration has been given to glint and glare issues and it has been demonstrated that any significant impacts will have a duration of less than five minutes in any one day.*

The proposal has been subject to consultation with the airport, who have raised no objections to the proposals and it is not anticipated that such facilities would have any impacts in terms of glint and glare (where this element of policy would relate to solar developments).

- ii. *Low impact vegetation management can be achieved (grazing).*

It is noted that the site is partially utilised for the grazing of animals, but the applicants have indicated that this particular area of land is of a particularly poor quality as regards to agricultural production, noting that the area of land is shaded by trees, which does not readily dry out and the lack of sunlight which means that crops never fully ripen at harvest (as discussed earlier in this report).

In summary, both Policy 11 of NPF4 and Policy R7 of the ALDP require decision makers to give significant weight to the benefit which the development of renewable energy project in terms of reducing carbon emissions. It is considered that the criteria contained within Policy 11 in terms of potential impacts because of the development could be satisfactorily addressed and that any impact as a result of the proposal would be localised and minor (although noting that the proposals would have an unacceptable impact on the setting of the green belt).

Transportation

Policy T2 (Sustainable Transport) of the ALDP 2023 seeks to minimise traffic generation, increase accessibility, encourage public transport and provide relevant infrastructure within developments. It also advises that existing routes, such as core paths should be enhanced and retained during development. Policy T3 (Parking) discusses matters such as parking within development and electric vehicle infrastructure. Similar guidance is provided by Policy 13 (Sustainable Transport) of NPF4.

The proposals, which include upgrade works to the unnamed access road including the provision of passing places, some widening works and upgrading works to the junction with Whitestripes Road have been subject to consultation with colleagues in Roads Development Management (RDM).

In terms of access, they have noted that the access track requires to be 4 m wide to accommodate fire tenders and that suitable passing places will be required and requested that these details be provided in advance of determination of the application. The applicant, however, requested that this information be covered by a suitably worded 'Grampian' style planning condition which should also include a commitment to upgrade the surface of the access road and locations and dimensions of the passing places which should be designed in accordance with National Roads Development Guidance, prior to any development taking place.

It is noted that a number of representations (objections) have been submitted in relation to this aspect of the proposal, including from Bridgefield House, where the proposed junction upgrade works would be required adjacent to Whitestripes Road. Queries were also raised as to whether the access track is sufficiently wide to accommodate the construction delivery vehicles for the proposed development, noting that it is around 3 metres wide in some locations. The Planning Service did request further evidence from the applicant to demonstrate that the access to the development site could be formed, and title plans were submitted to show the ownership of land required to provide passing places, confirming that they would be formed to the north of the existing road on fields in the ownership of the landowner and that no third party land would be required to form these. Evidence was also requested that the applicant had a right and opportunity to upgrade the development access (around Bridgefield House), although this was not forthcoming.

Notwithstanding, a "Grampian" style condition could be added to the consent, were planning permission to be granted, requiring further details of the development access and the required upgrade works prior to the commencement of development and that these were in place prior to the development being brought into use.

RDM have also noted that vehicles should only enter and exit the site in a forward gear and shows construction traffic entering the site from Whitestripes Road to the north only (accessing from the AWPR). Swept path analysis has also been provided for a fire tender entering the site, which was also considered to be acceptable.

In addition, the applicant was requested to provide visibility splays using the 85th% speeds of the road. This has been undertaken and is in line with guidance from the Design Manual for Roads and Bridges and National Roads Development Guide and can be accepted subject to the applicant replacing the existing bend warning signs with junction on bend warning signs (Diagram 512.1 of the Construction Traffic Management Plan). RDM have requested that a condition should be attached to ensure these works are provided in line with an agreed plan and completed before the site is operational.

RDM have also noted that during the construction phase additional Temporary Traffic Management measures will be in place. Were planning permission to be granted, a condition would also be required in this regard with a requirement to ensure that visibility splays are maintained which may require vegetation maintenance.

Parking/ Waste

No staff would be located on site on a permanent basis, and the submitted information notes that parking would be available within the curtilage of the site where permeable hardstanding is to be located. The site is not anticipated to generate any waste and therefore a waste management plan is not required.

In summary, it is noted that a number of the objectors have submitted comments and concerns in relation to access to the site. The applicant was requested to provide a response to this aspect and they have advised that they feel that the mitigation measures required to access the site can be achieved and that a Grampian style condition could be used to ensure that these were in place prior to the commencement of the use. It may be that if agreement is not reached with a landowner then the planning permission could not be implemented, but this would be a civil rather than a planning matter. Sufficient information has been submitted to demonstrate that the proposals could comply with Policy 14 of NPF 4 and Policies T2 and T3 of the ALDP.

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.”* In addition, 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.

As discussed earlier in this report, the proposals have been subject to consultation with Environmental Health, who have reviewed a number of Noise Impact Assessments submitted in support of the application, including the most recent revision. They have noted that they are content with the most recently submitted NIA, and have accepted its recommendations provided:

- The Battery Energy Storage System (BESS) comprises the plant (28 battery storage units, 14 PCS and 7 transformers) and layout detailed in the Infrastructure Layout Plan (Document Ref: SCE0001_AryburnBESS_ILA), with A-weighted sound power levels not exceeding those detailed in Table 6-5; and
- Prior to construction of the BESS, the warranted sound power levels, number of items and location of the chosen plant shall be checked against the assumptions considered in the assessment and where the proposed items are found to vary (i.e., in sound power level, location or number) an updated assessment shall be undertaken to confirm that the operational noise levels meet the relevant criteria (noise limits).

The above recommendations could be controlled via planning condition if the proposals were to be recommended for approval. This would ensure compliance with Policy 23 (Health and Safety) of NPF4 and with Policy WB3 (Noise) of the ALDP.

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 the 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.

The National Fire Chiefs Council - Grid Scale Battery Energy Storage System planning – Guidance for FRS is also of relevance and provides guidance on information requirements, system design, construction, testing and decommissioning, detection and monitoring, suppression systems, site access, water supplies, emergency plans, environmental impacts and recovery.

In terms of access, it also notes that suitable facilities for safely accessing and egressing the site should be provided. Designs should be developed in close liaison with the local FRS as specific requirements may apply due to variations in vehicles and equipment. This should include:

1. At least 2 separate access points to the site to account for opposite wind conditions/direction.
2. Roads/hard standing capable of accommodating fire service vehicles in all weather conditions. As such there should be no extremes of grade.
3. A perimeter road or roads with passing places suitable for fire service vehicles.
4. Road networks on sites must enable unobstructed access to all areas of the facility; and
5. Turning circles, passing places etc size to be advised by FRS depending on fleet.

The applicants have submitted an updated Fire Risk Management Plan and have confirmed that they had contacted the Scottish Fire and Rescue Service (SFRS) to discuss the issues and the following advice was offered: *two separate access points to the site are to be provided with the access road separated a sufficient distance from the nearest BESS to ensure that any responding crews are not in an area that is above the workplace exposure limits. This would require to be the subject of a condition.*

The document noted that there is one 4 m wide access road via Whitestripes Road (which will likely need to be upgraded and widened as discussed above) and before it reaches the BESS compound it divides approximately 45 m from the closest container and then provides two separate access points into the compound. In reality, the split in the roadway would still come downwind of the prevailing winds, meaning that the two accesses as proposed are likely to be impractical. This is not considered to warrant refusal of the application, as an additional technical solution may be possible, such as a further access to the north, and also due to additional reasoning detailed below with regards to how fires could potentially be contained on site.

The access point adjacent to the construction compound also provides a turning head for SFRS vehicles. An emergency access plan would be required via planning condition, were planning permission to be approved.

In terms of fire risk, the Fire Risk Management Plan also noted that modern / contemporary BESS containers offer a fundamental shift towards self-contained thermal event management. Modern designs incorporate integrated fire suppression systems combining aerosol agents and dry-pipe sprinkler networks that operate independently of external intervention. Crucially, they are engineered with calculated containment capacity to retain all suppression media within the container structure through sealed construction, reinforced gaskets, and internal drainage systems with collection sumps. A water strategy, would require to be agreed with the SFRS as part of the emergency response plan. This matter could be controlled via condition.

Provided the mitigation measures and conditions (in the event of a planning approval) are adhered to the development would not conflict with Policy 23 (Health and Safety) of NPF4.

Cultural Heritage

Policy D6 (Historic Environment of the ALDP aims to ensure that *“proposals which have the potential to impact on historic environment, historic assets, and heritage assets, or a significant element thereof, will be required to ensure the effective recording, assessments, analysis, archiving and publication of any reports or records to an agreed timeframe”*. Policy 7 (Historic Assets and Places) of NPF4 provides similar guidance.

In response to the above, a Cultural Heritage Assessment was submitted in support of the application, which has been reviewed by colleagues in the Archaeology service. They agree with its

conclusions and have confirmed that no archaeological mitigation works are required ahead of the development and had no further comments to make on the application. Subsequently there would be no conflict with either Policy 7 of NPF4 or Policy D6 of the ALDP.

Public Sector Equality Duty

Section 149 of the Equality Act 2010 states that a public authority must, in the exercise of its functions, have due regard to the need to advance equality of opportunity between persons who share a relevant protected characteristic and persons who do not share it. The Public Sector Equality Duty is engaged by this particular application because a letter of representation that has been submitted states that the proposals could potentially impact on the quality of life of an individual with a disability – particularly in relation to the resulting impact on that individual of construction traffic on the access track.

Having due regard to the need to advance equality of opportunity between persons who share relevant protected characteristics and persons who do not share it involves having due regard, in particular, to the need to remove or minimise disadvantages suffered by such persons that are connected to the characteristic; take steps to meet the needs of such persons that are different from the persons who do not share it; and encourage such persons to participate in public life or any other activity in which participation by such persons is disproportionately low.

Construction traffic would utilise the access track for a relatively short period of time, during the construction of the premises and would have a relatively short term impact on the amenity of surrounding residents including those with a disability. Thereafter, traffic to the proposed facility would be very infrequent. Bearing this in mind it is considered that there would only be a small impact on the individual with a disability were planning permission to be approved and in this instance the proposals are being recommended for refusal.

Other than the above matter, it is considered that there are no direct implications with the Public Sector Equality Duty in determining this application. Taking the foregoing into account, it is concluded that the Planning Authority has considered all of the requirements/ needs in Section 159 of the Equality Act 2010 when assessing and determining this application.

Matters Raised in Representations

1. The location of the development within the greenbelt, where it has not been demonstrated that a greenbelt location is essential for the proposed development. The site selection process is also not considered to be appropriate. *Response: this matter has been addressed above. The Planning Authority agree that this particular green belt location is not acceptable for such a use.*
2. The proposals would set an undesirable precedent for developments of a similar nature. *Response: each application is assessed on its own merits.*
3. The proposals would result in the loss of prime agricultural land. *Response: this matter has been addressed earlier in this report. The Planning Authority are content that the proposals would not result in the loss of prime agricultural land.*
4. The proposals would have an adverse impact on wildlife and biodiversity including on heron, bats and badgers. There are also further protected species on site. *Response: supporting documents have been received that demonstrate that the development could proceed without having an unacceptable impact on any protected species or on biodiversity.*

5. The area is susceptible to flooding. *Response: Flooding and Coastal Protection have raised no concerns from a flooding perspective and are content with the findings of the DIA.*
6. The proposals would have an adverse visual impact on the surrounding area and would be out of character with the surrounding area. *Response: this issue has been assessed in greater detail in the above evaluation. The planning authority would agree that the proposals have an unacceptable visual impact.*
7. The proposals would have an adverse impact in terms of noise and the construction phase would have adverse impacts in terms of increased traffic, noise, impacts on properties and light pollution along with water contamination. *Response: these issues have been considered in the above evaluation.*
8. The site design does not follow best practice in that there would be insufficient space for the repair and maintenance of the facility and that a fire appliance would not be able to satisfactorily enter the facility. The proposed access to the site is also unsuitable for the proposed development. *Response: these issues have been considered in the above evaluation.*
9. Issues in relation to the construction phase of the development, in that it would be difficult for construction traffic to enter the site along the access road, where the track is not suitable for up to 15 HGV movements per day. Also note errors in the submitted information where it states the access track is 4m wide, where in places it is a maximum of 2.5m wide. *Response: the applicant has submitted information indicating that they are content that the site could be adequately service and colleagues in Roads Development Management are content with the proposals. Finalised details of the access track could be controlled via planning condition.*
10. Health and safety concerns. Insufficient drainage measures and mitigation measures for potential contamination of the surrounding area. *Response: the proposals have been subject to consultation with colleagues in Flooding & Coastal Protection who have raised no objections to the proposal. The other matters have been discussed elsewhere in the fire safety section of the report.*
11. Missing information including details for the route of the cabling and the energy storage levels of the facility. Further information is required in this regard. *Response: this matter has been discussed elsewhere, the route of the cabling would be permitted development and does not form part of the assessment of this application.*
12. The location of the proposed tree planting could result in increased fire risk. *Response: the location of the proposed landscaping is considered to be acceptable.*
13. Object due to the size of the facility. *Response: the size of the proposal is typical of such a facility.*
14. A full HSE Risk Assessment has not been submitted. *Response: this is not required for the assessment or determination of the planning application.*
15. Fire risks associated with the proposed development and insufficient information submitted in terms of fire risk. *Response: this matter has been discussed in the fire safety section of this report.*
16. The proposals would have an adverse impact on the quality of life of residents in the surrounding area, in particular those who use the access track. *Response: the proposals are*

located a sufficient distance away from residential properties and would have no adverse impact on residential amenity. The levels of journeys once the development was operational would be minimal and whilst there would be short term disruptions (were planning permission approved). An assessment of the Public Sector Equality Duty has been undertaken in the above evaluation.

17. Concerns about the pre-application process, noting that residents did not receive invites to any of the pre-application events. *Response: comments noted, errors were noted during the application process and a further consultation event was undertaken.*
18. The Sequential Impact Assessment is inadequate in that it states that the need for development areas is 0.94 hectares, whereas the development site area is 0.22 hectares. There are suitable sites within industrial estates that would meet the criteria for development. *Response: this matter has been considered in the above evaluation.*

Support:

19. In the current climate of energy production, it is important that such facilities are supported where power production exceeds usage and meeting the net zero targets of the Scottish Government. *Response: Comments noted, although the Planning Authority are supportive of such developments, the current location is not considered to be appropriate for development.*
20. The proposed battery storage system represents technological innovation that will position Aberdeen City as a leader in modern energy solutions. *Response: Comments noted.*
21. A reliable energy storage facility will contribute to a stable energy supply which is essential for the local business community. *Response: comments noted, although these are noted there are similar facilities which have been consented and under construction in the surrounding area.*
22. The proposal is the nearest available to the Dyce connection and will cause the least possible disturbance. *Response: there have been facilities approved (with one under construction) that are in closer proximity to the Dyce substation.*

RECOMMENDATION

Refuse

REASON FOR RECOMMENDATION

1. That it has not been adequately demonstrated that a site within the green belt is essential for the proposed battery energy storage facility. It is considered that it would be possible to locate such a facility on a more sequentially preferable site in conjunction with more appropriate land uses in the surrounding area and in closer proximity to the Dyce Cothal View Grid Substation. In addition, the proposals would introduce an “*industrial*” style of development to this rural and agricultural setting which would have an adverse urbanising effect on the character of the area, resulting in the significant erosion of the rural, agricultural feel and providing a facility that would be at odds with the tranquil setting of the surrounding area, which has not previously seen developments of this type. The proposals would therefore undermine the setting of the green belt in this location and could not be supported. The proposals are therefore considered to be contrary to Policy 8 (Green Belts) of National

Planning Framework 4 and Policy NE1 (Green Belt) of the Aberdeen Local Development Plan 2023 and there are no material planning considerations that would warrant approval of planning permission in this instance.