

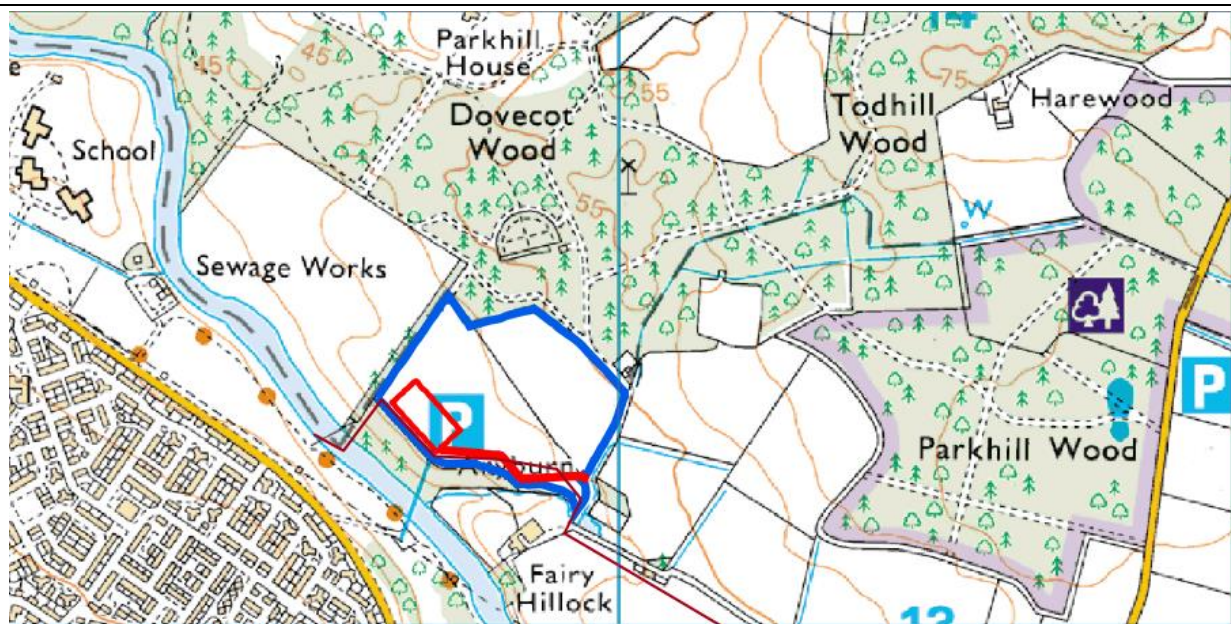


Pre-Application Forum

Report by Development Management Manager

Meeting Date: 15th May 2024

Site Address:	Land North of Aryburn Farm, Dyce, Aberdeen, AB21 0HS
Description of Proposal:	Proposed battery storage units with associated infrastructure, control and switch building, containers and associated works including access
Notice Ref:	230869/PAN
Notice Type:	Proposal of Application Notice
Notice Date:	28 July 2023
Applicant:	Sustainability Unlimited LLP
Ward:	Dyce/Bucksburn/Danestone
Community Council:	Dyce And Stoneywood



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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 site relates to an area of an agricultural field extending to approximately 0.74 hectares. It is located approximately 975m to the west of Whitestripes Road and approximately 1km to the east of the A947; the settlement of Dyce is located approximately 210m to the south, separated by a commercial woodland and the River Don. The surrounding area on the north 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 immediate north of the site. A grouping of farm buildings and associated farm cottage (Aryburn Farm) are located to the immediate south-east.

Relevant Planning History

A Screening Opinion (Ref: 221557/ESC) for the erection of containerised battery storage units, control building, switch room, inverter containers, lighting and associated works was issued in January 2023 confirming that an Environmental Impact Assessment was not required.

APPLICATION DESCRIPTION

Description of Proposal

The submitted Proposal of Application Notice relates to the provision of multiple containerised battery storage units totalling 33 megawatts of export capacity along with associated infrastructure, control building, switch room, inverter containers, lighting and other associated works. The connection to the Dyce (Cothal View) substation to the west would be by an underground cable, approximately 1.5km in length.

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 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 –

- 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 in supporting 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: In accordance with the mitigation hierarchy by first avoiding and then minimising the amount of disturbance to soils on undeveloped land; and 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 exception 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 renewal energy developments”*. Given the emphasis placed on achieving net zero targets, it is accepted that battery storage could be considered as essential infrastructure or as a renewable energy development. At this stage it is not clear if the energy stored at the site would be generated in a renewable way, rather than being generated from more traditional, non-renewable sources. Further information will be required in this regard.

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 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”*.

Layout, Siting and Design & Impact on Trees

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.

In addition, issues of layout, scale and design will need to be considered against Policy D1 Quality Placemaking, D2: Amenity and D4: Landscape of the ALDP 2023. 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: make the most of any opportunities offered by the site to optimise views and sunlight through appropriate siting, layout and orientation; ensure that occupiers are afforded adequate levels of amenity in relation to daylight, sunlight, noise, air quality and immediate outlook; ensure that occupiers are afforded adequate levels of amenity in relation to daylight, sunlight, noise, air quality and immediate outlook; have a public face to the street to ensure natural surveillance, and active street frontages; ensure that refuse and recycling facilities, cycle storage, low and zero carbon technology, plant and services are sensitively integrated into the design; 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.

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 will be required 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 within the site.

PRE-APPLICATION CONSULTATION

In terms of pre-application consultation, the applicants have proposed two separate in person public consultation events, 14 days apart from each other along with an online event. The Planning Service responded to the Proposal of Application Notice request in August 2023 advising of the requirements of the public events (including an appropriate location within the city boundaries), that local Councillors should be notified of the event and neighbouring properties which should be advised of the event.

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 Impact Assessment
- Planning Statement
- Pre-Application Consultation Report

RECOMMENDATION

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