

Planning Supporting Statement

Land at Mary Street
Craighall Business Park
Port Dundas
Glasgow
G4 9UD

On behalf of **Fig Power Ltd**

Date: 07/02/2025

Our Ref: MR/2024/05/0270





Quality Assurance

**This report has been prepared within the quality system operated at
Graham + Sibbald**

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1.00 Introduction

1.01 This Planning Supporting Statement has been prepared on behalf of Fig Power Ltd in support of the Section 36 application under the Electricity Act 1989 and request for deemed planning consent under Section 57(2) of the Town and Country Planning (Scotland) Act 1997, to the Scottish Government Energy Consents Unit (ECU). The application is for a proposed Battery Energy Storage System (BESS) at Mary Street, Craighall Business Park, Port Dundas, Glasgow, G4 9UD.

1.02 This Planning Supporting Statement provided a description of the site and the proposed development. The Statement assesses the proposal against relevant legislative and planning policy requirements and provides justification to support this development.

1.03 The Planning Supporting Statement contains the following sections:

2. Legislative Context
3. Need for Proposed Development
4. Description of Proposed Development
5. Relevant Planning History
6. Planning Policy Assessment
7. Statement of Community Benefits
8. Summary and Conclusions



2.00 Legislative Context

2.01 The legislative position of development for new energy schemes over a certain threshold in Scotland is dictated by a different legal framework than that of traditional planning applications. By nature of being for a development with a capacity of 90MW, this scheme will be assessed under the **Electricity Act 1989**. Also of relevance is **The Town and Country Planning (Scotland) Act 1997**, the **Electricity Works (Environmental Impact Assessment) Scotland Regulations 2017**, and **Climate Change (Emissions Reduction Targets) (Scotland) Act 2019**.

Electricity Act (1989)

2.02 Via a Chief Planner's letter dated August 2020, the Scottish Government confirmed that it considers Battery Energy Storage Schemes (BESS) to generate electricity, "*and is therefore to be treated as a generating station*". This means that the provisions of Section 36 of the Electricity Act (1989) are engaged for any BESS scheme with a capacity of 50MW or higher. This would apply to this proposed development due to the proposed output capacity of 90MW. The application, therefore, is to be decided by Scottish Ministers, with the relevant planning authority (in this instance Glasgow City Council) fulfilling the role of statutory consultee.

2.03 Schedule 8 of the Electricity Act contains provisions for consents granted by Scottish Ministers under Section 36 of the Electricity Act. Section 2 states that, where the relevant planning authority objects to the application, and this is not withdrawn, then a public inquiry will be held.

The Town and Country Planning (Scotland) Act 1997 (as amended)

2.04 Under Section 57(2) of the Town and Country Planning (Scotland) Act 1997, planning Permission is "deemed" to be granted if Scottish Ministers grant consent under Section 36 of the Electricity Act, meaning that there is no requirement to submit a separate application for planning permission.

2.05 Section 25 of the Town and Country Planning (Scotland) Act 1997 states that when determining an application under the Act, decision making authorities must have regard to the development plan, unless material considerations indicate otherwise. While in this instance consent would be issued under the Electricity Act, and therefore this provision does not apply, it is anticipated that Scottish Ministers, and Glasgow City Council, will have regard to the development plan in determining their response to the application.

Electricity Works (Environmental Impact Assessment) Scotland Regulations 2017

2.06 Applications made under Section 36 of the Electricity Act are subject to the Environmental Impact Assessment regime, and therefore require to be screened for the requirement to undertake an Environmental Impact Assessment (EIA).

2.07 A request for a Screening Opinion was submitted to Scottish Ministers in September 2024 (ref: ECU000005195), and a formal response was received on the 15th January 2025, confirming that the proposal does not constitute EIA development, and an EIA report is not required for this submission. The Screening Opinion established a number of principles about the proposed development:



- The site will use the existing footprint of the batching plant, therefore minimising the impact on natural resources;
- Though there would be some construction waste associated with the proposal, it is not considered to be significant;
- Minimal operational waste is expected;
- Some short-term localised noise and traffic impacts during construction may be anticipated;
- The site is confirmed as being brownfield and located in an urban setting, and the location is not environmentally sensitive;
- The development is not anticipated to impact on natural resources;
- No significant impacts are anticipated on land, soil, water, air, or climate; and
- Cumulative impacts on residential properties are considered to be unlikely.

2.08 Glasgow City Council were consulted as part of the Scottish Ministers' Screening Opinion (ref: 24/02304/SCR), and confirmed on the 19th December 2024 that they did not consider an EIA was required as the development was not likely to result in a significant effect on the environment and the development is not defined as an EIA development.

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

2.09 The Scottish Parliament passed the Climate Change (Emissions Reduction Targets) (Scotland) Act in September 2019. This established the Scotland-specific target date of 2045 to achieve Net Zero carbon emissions.

2.10 So far, target dates for achieving reductions on the way to 2045 have not been met, and in 2024 the Scottish Government acknowledged that the target of cutting emissions by 75% by 2030 was unachievable. The need to reduce emissions ever more rapidly and significantly is therefore considered to be in clear focus, as more drastic reductions beyond 2030 to meet the 2045 date will be necessary.



3.00 Need for Proposed Development

- 3.01 The Scottish Government has set an ambitious target to reduce greenhouse gas emissions to net zero by 2045.
- 3.02 The UK's national grid has traditionally relied mostly on baseload power stations to provide the nation's electricity, with demand being predicted and responded to in real time, and often supplemented by intermittent power sources. As these power stations rely on fuel like natural gas or coal, they can be fired at any time in order to respond to demand on the grid.
- 3.03 As the UK and Scottish Governments strive to meet national and international carbon-reduction commitments, the energy grid will become more dependent on renewable energy sources such as wind and solar. Furthermore, coal power generation has now ended in the UK, and gas prices have been driven up in recent years as a result of global conflicts, highlighting the benefits of energy independence and bringing the beneficial role that renewable energy sources can play into even sharper focus.
- 3.04 As these sources are often highly intermittent and dependent on weather conditions, daylight hours, wind speed etc, the amount of energy available to the grid will vary despite the baseline energy demand remaining the same.
- 3.05 Therefore, there is growing demand and requirement for energy storage and grid balancing services. Energy storage can take the excess energy from the grid that is generated at times of high generation (such as windy periods and sunny days), store this and then release the energy back to the grid when this is needed. Battery energy storage schemes (BESS) are one such method of storing energy and balancing the grid.
- 3.06 The **Future Energy Scenarios 2024** was published by the National Energy Systems Operator (NESO) in July 2024. The NESO, formerly the Electricity System Operator (ESO), is an independent public corporation with "*a primary duty to act in the manner it considers best to promote net zero, energy security and efficiency and economy*". The Future Energy Scenarios document sets out the pathways in the energy sector required to work towards the UK ambition to be carbon net-zero by 2050.
- 3.07 The document considers potential scenarios and futures in the energy sector that could emerge as a result of current policy decisions and commitments made by the government and development sector. In considering all potential scenarios, NESO note that "*electricity storage is necessary across all our net zero pathways to help balance the grid and ensure security of supply*". This indicates the central importance that energy storage schemes in general have in achieving net-zero and suggests that net-zero in the energy sector is not possible without the deployment of this technology.



- 3.08 It is indicated that “*Great Britain currently has 4.7GW of operational battery storage capacity*”. The various scenarios envisaged in the Future Energy Scenarios document suggest that anywhere between 29 and 36GW of capacity may be needed by 2050 (UK-wide) to meet net-zero, depending on the scenario that unfolds. In any case, this is a significant increase of 6-times the capacity in even the lowest-volume scenario. A Freedom of Information Response by the Scottish Government published in October 2024 references the NESO figures in the Future Energy Scenarios document and suggests that between 6.4-7.6 GW of this storage capacity will be required in Scotland by 2045.
- 3.09 Evidently, in all future scenario modelling by NESO, BESS plays a significant role in allowing the Scottish and UK governments to meet respective 2045 and 2050 net-zero goals.
- Benefits of the Proposed Development**
- 3.10 The proposal delivers a number of benefits, in addition to the contribution it will make to the national need for energy storage capacity necessary for Scotland and the UK to meet net zero requirements outlined above.
- 3.11 Battery storage plays a critical role in balancing the national grid, maintaining grid frequency, and providing energy during periods of low supply. Key benefits include:
- Minimising curtailment payments for switching off wind turbines.
 - Enhancing renewable energy utilisation.
 - Supporting local and national Net Zero targets.
 - Providing backup power during possible outages.
- 3.12 Battery storage complements Scotland's renewable energy capacity, enabling more efficient energy production and storage. It ensures that renewable energy generated is fully utilised, contributing to energy security and cost reduction for residents and industries.
- 3.13 As will be highlighted in this Statement, the proposed development complies with the relevant Development Plan policies, and draws explicit support from a number of these, including NPF4 Policy 11. This includes policies relating to residential amenity, as the proposed use is a low-impact, high-amenity industrial development that does not create any unacceptable noise impact and creates no air quality impacts. In comparison to the existing use of the site (a concrete batching plant) this is a significant improvement and makes a beneficial change to impacts on residential amenity and some of the regeneration ambitions for the surrounding area.
- 3.14 The site's location is also not sensitive in terms of ecological or landscape designations, townscape or cultural heritage, or flood risk, making it a suitable candidate for sustainable reuse and ensuring there are no negative impacts on the surrounding area.



3.15 During construction, the proposed development is likely to create in the region of 40 full-time equivalent (FTE) jobs with a significant multiplier effect across the supply chain. To ensure accurate reporting from the pre-construction to full operation, Fig Power Ltd aims to collaborate with Scottish Renewables, the Fraser of Allander Institute at Strathclyde University, and the Scottish Government's Net Zero division. Once operational, job numbers will be minimal due to the adoption of advanced technologies. Further details of the socio-economic benefits resulting from the proposed development is contained within Section 7 of this report.

3.16 Fig Power is committed to contributing to local community wealth building and working with Glasgow City Council to identify local projects and initiatives that Fig Power can contribute towards. The community benefits proposed as part of this development proposal, are set out in Section 7 of this report.



4.00 Description of Proposed Development

4.01 This section of the report provides a description of the site and the proposed BESS development.

Site Location and Description

4.02 The site is located in Craighall Business Park, within the Port Dundas area of north Glasgow. The area is generally characterised by industrial and business activity and the site is directly adjacent to existing electricity distribution infrastructure (the substation to the north). To the east, the site is bound by an embankment that leads down to new-build flatted residential properties. To the south is vacant land on a slope that leads down to a canal. To the west is a Conference Centre, and beyond this is Speirs Wharf.

4.03 The site currently comprises a concrete batching plant, extending to approximately 0.63ha. Access is taken from Mary Street to the southwest of the site and the site is currently surrounded by a combination of palisade fencing and brick wall topped with barbed wire. There are a small number of trees in the west of the site that are within the sit boundary.

4.04 The site is located in an area characterised by transitional activity. The area has traditionally been an industrial area, and previously was the site of mills, bonded warehouses, and chemical works. The Pinkston Power Station was also located not far to the east of the site. Port Dundas and Dundashill have been categorised by more modern business and industrial activity, and in more recent decades the area has housed a business park, workshops, warehouses, and storage yards. Parts of the area are currently undergoing redevelopment through the Port Dundas Masterplan Area, which applies to certain parts of Port Dundas/Dundashill. The west side of Dundashill is predominantly still business and industry led and the site is currently in industrial use.

Description of Proposed Development

4.05 The description of the proposed development is as follows:

“Erection of a Battery Energy Storage System with a generating capacity of approximately 90 MW, comprising of battery-based electricity storage containers and ancillary development including transformers, switchgear container, site service container, CCTV cameras, and security lighting, internal access roads, landscaping and other associated works”

4.06 The proposed development will involve the erection of a Battery Energy Storage Scheme (BESS) comprising of up to 36 battery storage containers situated on concrete plinths. In total, the site will have a maximum export capacity of 90MW.

4.07 In addition to these storage containers, the development will comprise transformers, switchgear room, site service container, CCTV cameras, security lighting, internal access, and landscaping/biodiversity enhancement measures.



- 4.08 Access to the development will take place from the existing access point at Mary Street, to the southwest of the site. The accompanying Transport Statement has confirmed that, as this current route is utilised by HGV traffic, it is considered suitable to be retained for the use of the development site.
- 4.09 Additionally, the perimeter security fencing and walls will be retained as part of the new development on the site.
- 4.10 As shown in the accompanying site plans, the development will be arranged in 18 clusters of battery units, laid out in a roughly T-shaped arrangement. 7 of the clusters will be along the north-south running internal road, while the remaining 11 will be located along the lateral road in the north of the site. Each cluster will utilise a twin Skid which it will share with the one next to it, except for one in the northeastern-most part of the site and another in the southern-most part of the site which will each have use of their own individual skid.
- 4.11 The switchgear building will be located in the southeast of the site, and from here cabling will run to a connection point off-site.
- 4.12 As outlined in the accompanying Construction Environmental Management Plan (CEMP), during construction the existing access from Mary Street will be utilised, with vehicles only accessing/exiting the site during the agreed working hours (proposed to be 8am-5:30pm Monday to Friday, and 8am-1pm Saturday). On-site parking will be provided in the northwest of the site. The CEMP also sets out all measures that will be taken to ensure the construction process does not create unacceptable noise levels or dust emissions, ensures that waste on site is appropriately managed and disposed of, water pollution is avoided, mud is not tracked off-site by vehicles, and that generally the construction stage does not negatively impact on nearby residents, businesses, or road users.

Technology Selection

- 4.13 The battery cell proposed for this Battery Energy Storage (BES) project is a Lithium Iron Phosphate (LFP) cell, which forms the main chemical component of the battery. It does not contain any nickel or cobalt both of which have caused concerns in the past regarding human and environmental impact. LFP batteries are inherently safer compared to other lithium-based battery chemistries. This enhanced safety is primarily attributed to the presence of the iron ion, which stabilises the cell structure and reduces the likelihood of thermal runaway. During charging and discharging, the inclusion of the iron ion makes it more difficult for a redox reaction to occur with the electrolyte, thereby improving the battery's resistance to overheating and fire risks. Lithium-ion batteries are commonly used in BESS due to their high energy density, efficiency, and long cycle life.
- 4.14 The current proposed grid connection by SP Energy Networks is a 33kV connection at the West George Street GSP. However, this remains subject to change depending on the outcomes of the Connections Reform and the BEGA offer. SP Energy Networks confirmed that the substation adjacent to the site, Port Dundas GSP, currently lacks the available capacity required to support the battery project.



Site Selection

- 4.15 NPF4 identifies Strategic Renewable Electricity Generation and Transmission Infrastructure as National Developments. The principle of which is therefore agreed upon and the delivery of which needs to be facilitated. This is in recognition of the fact that a large and rapid increase in electricity generation from renewable sources will be essential for Scotland to meet its net zero emissions targets. This includes the delivery of new energy storage technologies, as infrastructure which directly supports substations and makes use of any likely surplus capacity.
- 4.16 The closest substation to the site for connection is West George Street. This substation has been identified as one with current capacity, and Fig Power has actively sought to identify the nearest available and practicable site to install a battery storage facility in accordance with the NPF4 and Glasgow City Council land use policy to support improved network resilience and where possible reduce curtailment cost.
- 4.17 A formal connection offer has been secured to connect the site to the substation at West George Street.

Local and National Planning Policy and Influences on Our Site Selection

- 4.18 Building on Fig Power's widely adopted site selection process across the UK, they firstly identified the local grid capacity availability, they then arranged a detailed review of potential site availability and on this occasion using the undernoted as a guiding reference:
- I. NPP4 as it relates to local planning and energy generation and storage
 - II. Glasgow City Plan
 - III. Glasgow City Council Climate Plan.

Why this location?

- 4.19 The site is close to the point of connection at West George Street, provided by the Distribution Network Operator (DNO). The nature, size and scale of the proposed development will result in minimal environmental effects. The site will be suitably screened to protect and enhance the local visual amenity and provide on-site biodiversity enhancements. It is also noted that the site is within an established industrial and business location, with the site currently in industrial use.
- 4.20 The topography of this site supports Fig Power's principal approach of minimum site visibility and minimal impact of the proposed development to the local landscape and surrounding areas. This will be enhanced by screening proposals. The site comprises of relatively flat ground for ease of site assembly.
- 4.21 The site has been selected as being close to the local road network for easy access during site assembly and operational maintenance. The site benefits from an existing access road. The site also benefits from an existing sizeable laydown area from the current use, that can be utilised for site assembly with no impact on third parties.
- 4.22 The site has been selected as it is not located within an area of flood risk. The site is not covered by any environmental or landscape designations.



4.23 The site is in the ownership of a committed landowner, who is fully supportive of releasing the site for battery storage use.

4.24 A preferred cable route has been selected that connects the site to the sub-station, via local public highways. Whilst Fig Power will be guided by the DNO, it is expected that any cable run from the site will be an underground cable to the substation ensuring little to no community disruption at site assembly and thereafter operational management.

Site Assessment

Cultural Heritage

4.25 A search of the site and the surrounding area has been carried out on Historic Environment Scotland's PastMap feature to identify any heritage assets or designations of relevance to the site. The below PastMap extract identifies these:

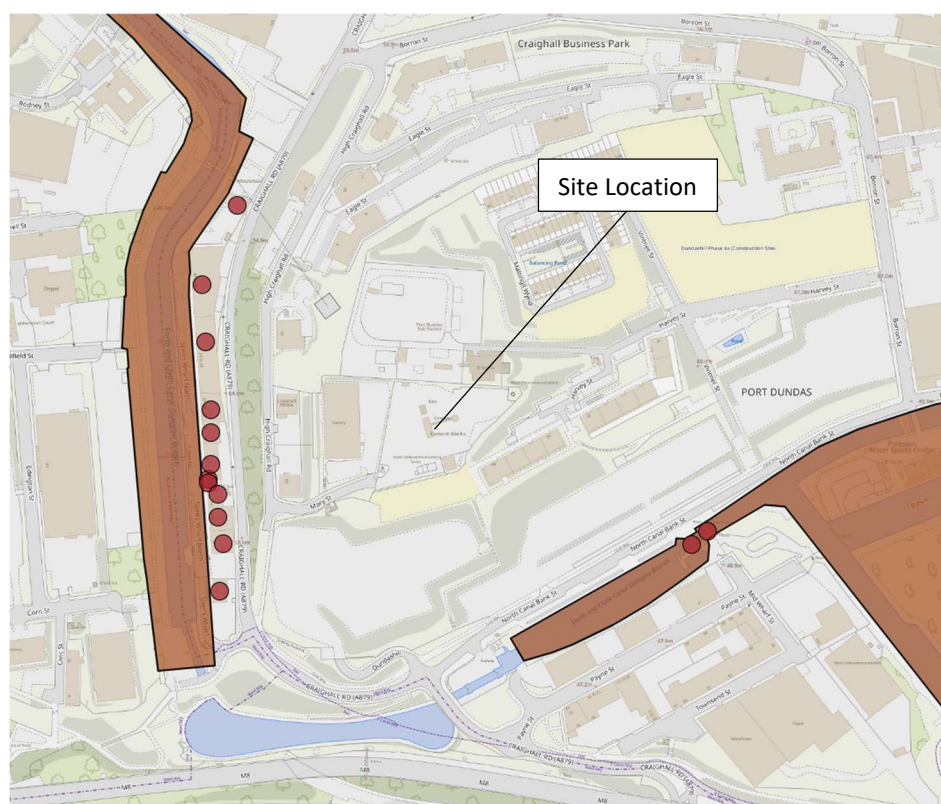


Figure 1 PastMap Extract

4.26 This identified no assets on or directly adjacent to the site. A number of Listed Buildings were identified in close proximity to the site, indicated by the red dots in Figure 1. Additionally, parts of the Forth & Clyde Canal are designated as Scheduled Monuments, shown by the brown shading on Figure 1, though again none of these are directly adjacent to the application site.

4.27 The following features are identified in Figure 1:



Listed Buildings

- 52 Speirs Wharf, Wheatsheaf Building – ref: LB44112 – Category C
- 40-50 Speirs Wharf – ref: LB33620 – Category B
- 4-38 Speirs Wharf – ref: LB33619 – Category B
- 2 Speirs Wharf – ref: LB33618 – Category B
- Midwharf Street and North Canalbank Street, Railway Swing Bridge (including stone platforms and revetments) – ref: LB33616 – Category B
- Midwharf Street and North Canalbank Street, Bascule Bridge (including stone platforms and abutments) – ref: LB33617 – Category B

Scheduled Monuments

- Forth & Clyde Canal, Glasgow Branch – ref: SM6771; and
- Forth & Clyde Canal, Port Dundas Canal Basin – ref: SM6689

4.28 The above is corroborated by the Desk-based Archaeological Assessment for the proposed development which has been undertaken and accompanies this proposal. This also identifies further heritage assets beyond those above that are within 200m of the site, though the Assessment concludes that none of these will be directly affected by the proposal, and will have “*no significant effect upon the settings*” of a variety of heritage assets including those listed above.

4.29 The Assessment considers that, since the site has been “*intensively occupied since the nineteenth century, there is limited scope for the survival of earlier archaeological remains or deposits within the proposed development area*”.

Flood Risk and Drainage

4.30 A search has also been undertaken on SEPA’s online flood map resource to consider the potential risk of flooding on the development site and to the surrounding area as a result of the development.

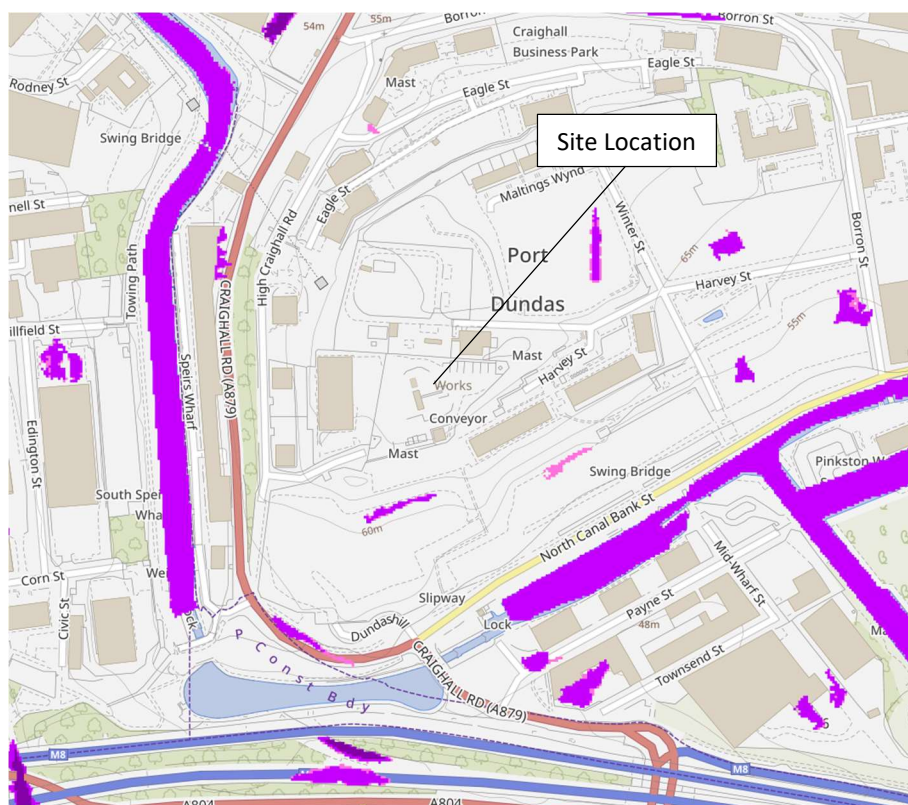


Figure 2 SEPA flood map extract

- 4.31 The above map extract shows no form of flooding present on the site. There are some parts of surrounding sites with surface flooding risk (shown by purple shading), though this is most present on the canal. As confirmed in the accompanying Flood Risk Assessment, the site is therefore “*at an acceptably low risk of flooding from all sources*”.
- 4.32 In order to ensure the site does not have an unacceptable impact on other sites, a Drainage Impact Assessment and SUDS proposal accompanies this submission. This confirms that there is currently limited drainage infrastructure on the site, and the nature of the site makes it largely impermeable. As a result, surface water is currently discharged into the sewer with no treatment and at an uncontrolled rate. Therefore, a new drainage design for the site is included which will improve the performance of the site in this respect and remove the likelihood of untreated surface water flooding the sewer.
- 4.33 The accompanying Drainage Impact Assessment undertaken for the site identified limited existing drainage infrastructure on the site, and concluded that due to the hard-standing on the site, current surface water runoff discharges without attenuation or treatment into the combined sewer. Given the nature of the existing activity on the site, this could be causing quantities of pollutants to enter into the sewer without treatment, as well surface water flooding into the sewer at an uncontrolled rate. The development of the site is a benefit in this regard as it creates an opportunity for this position to be improved, by providing a formal SUDS scheme that will not only treat surface water but also control its discharge into the sewer system at an acceptable rate.

Ecology and Biodiversity Enhancement



- 4.34 A check of NatureScot's online SiteLink feature has found no ecological designations in the proximity of the site. The accompanying Preliminary Ecological Appraisal (PEA) confirms this, though did identify a number of statutory designated sites within 5km of the site. While it is not expected that the works would impact on any of these, the PEA highlighted the need to ensure that no site-runoff pollution reached the Forth and Clyde canal, where it could impact on some of these conservation and nature reserves.
- 4.35 The PEA included a site inspection, and identified no evidence of protected species, but did identify suitable habitat for bats, hedgehogs, birds, and invertebrates within the site and the local area. No further surveys were recommended as part of this, though a number of opportunities for biodiversity gain have been identified, including the use of locally native vegetation, plants that provide suitable foraging and commuting habitat, the use of water-permeable materials, and the installation of bird boxes around the site.
- 4.36 A Tree Survey for the site confirmed that the group of trees on the west of the site was no large or dense enough to be relevant to the government policies on woodland removal, and that none of these were of ancient or veteran status. All trees on site were categorised either B or C in terms of their quality, with no trees in category A identified.
- 4.37 The accompanying Landscaping Plan indicates the number and type of new planting on the site. This is primarily around the edges, and allows for a targeted and co-ordinated landscaping approach that will enhance biodiversity outcomes on site. In addition to the new planting around the periphery of the site, areas of wildflower meadow are proposed to be laid down throughout the site, which will encourage use of the site by foraging insects and birds. The Landscaping Plan also shows the proposed location for a number of biodiversity enhancement measures such as bird, bat, and insect boxes throughout the site.
- Ground Conditions*
- 4.38 A search of the Mining Remediation Authority's online map viewer indicates that the site is, at least partially, in a Development High Risk Area, as shown by the cross hatching on the below extract.



Figure 3 Mining Remediation Authority map extract

4.39 The accompanying Geo-Environmental Risk Assessment for the site confirms this. In terms of contamination risk, this considers that there is a moderate risk of contamination to groundwater from the past use(s) of the site, as well as a low-moderate risk of contamination arising from a variety of other sources (such as inhalation, dermal contact, ground gas, etc).

4.40 The contamination risk identified above is sufficient enough that it is recommended that further investigation work be undertaken, which could be conditioned as part of any consent that may potentially be granted for the site.

Noise

4.41 Further assessment work has been undertaken in the form of a Noise Impact Assessment. Due to the proximity of the site to residential properties and the proposed regenerative masterplan for the Port Dundas area, this was regarded to be a significant consideration. This Assessment concluded that the predicted operational noise levels arising from the site are within the accepted levels and limits at the most-affected sensitive property, including the night-time, and therefore there was no unacceptable impact arising from this.

Landscape and Visual Impact

4.42 A Landscape and Visual Impact Assessment has also been provided in order to demonstrate that the proposed development will not have any significant visual impacts. The site occupies an existing urban context, which would limit townscape impacts. As the site is in a raised position and screened by some existing built features, the visual effects are regarded to minimal. Some residents of upper floors of buildings within the Dundashill masterplan area may be able to view the site, but the use of landscape screening will mitigate this, and means that any impacts are localised.



5.00 Relevant Planning History

5.01 A search has been undertaken on Glasgow City Council's online planning portal. The following applications of relevance have been found on the site. No formal planning history search has been requested from Glasgow City Council.

| Application Reference | Applicant | Description of Development | Decision (Date) |
|-----------------------|--------------------------------|---|--------------------|
| 93/02690/DC | United Malt & Grain Distillers | Erection of mash house, malt storage complex, and ancillary offices, and formation of access road | Granted (14/01/94) |
| 14/01033/DC | Hope Construction Materials | Erection of single-storey modular office building with associated parking | Granted (07/08/14) |
| 18/01073/FUL | Breedon Northern Ltd | Installation of replacement plant for ready mixed concrete production, with alterations to site yard layout | Granted (31/07/18) |

Table 1 Planning History of the Site

5.02 The surrounding area has seen development activity over recent years. Table 2 below sets out the planning history of the Port Dundas/Dundashill area in the vicinity of the application site.

| Application Reference | Applicant | Description of Development | Decision (Date) |
|-----------------------|---|---|--|
| 16/01130/DC | Bigg Regeneration Ltd Partnership & Diageo Scotland | Erection of mixed use development comprising Class 1 (Retail), Class 2 (Financial, professional and other services), Class 3 (Food and Drink), Class 4 (Business), Class 7 (Hotel), Class 9 (Houses), Class 10 (Non-residential institutions), Class 11 (Assembly and Leisure), Sui Generis (Flats) including car parking, access roads, landscaping and other associated works | Granted (22/03/17) |
| 20/00455/FUL | Hoxton Securities (Glasgow) Ltd | Erection of mixed use development comprising residential flats (182 units) (Sui generis), one commercial unit (Classes 1, 2 or 3), one rehearsal space (Class 10) with associated landscaping and infrastructure @ Site between Sawmillfield Street/ Farnell Street, Glasgow | Refused (03/03/21) Appeal Dismissed |



| Application Reference | Applicant | Description of Development | Decision (Date) |
|-----------------------|----------------------------|--|-----------------------|
| 20/00895/FUL | Craighall Developments Ltd | Erection of residential development (34 units) with associated parking, amenity space, and landscaping @ Site to north of 10 High Craighall Road, Glasgow | Granted (16/11/21) |
| 24/00424/FUL | Borrone Partners Ltd | Erection of purpose-built student accommodation (PBSA) (Sui Generis) including landscaping, access and associated works @ 99 Borrone Street, Glasgow, G4 9XF | Pending Determination |
| 24/00586/FUL | Scottish Opera Ltd | Mixed-use development to provide music rehearsal and performance spaces, film facilities, general industrial, office, production space (Class 11, Class 4, Class 5, Class 6), purpose built student accommodation (sui generis), retail professional service (Class 1A), food and drink (Class 3 / sui generis), non-residential institutions uses (Class 10), assembly leisure (Class 11), building refurbishment and alteration works, demolition, associated landscaping, public realm, access and infrastructure @ Scottish Opera, 40 Edington Street, Glasgow, G4 9RD | Pending Determination |

Table 2 Planning History of the Surrounding Area

- 5.03 The primary consent granted in the area is application ref: 16/01130/DC, which granted consent for the wider Port Dundas masterplan and sets the development ambitions for the area. Application 16/01130/DC directly adjoins the boundary of the application site to the south.
- 5.04 Application 16/01330/DC, granted in March 2017 sets out a comprehensive regeneration of the Dundashill area that has since been subject to detailed applications for each phase of the development, and subsequently developed and, in parts, completed. The residential element nearest the site (adjacent to the south east) has been developed following a further approval under the Matters Specified in Condition application 19/02180/DOC01.
- 5.05 In general, the planning history demonstrates the transitional nature of the area with a number of applications for mixed-use development, residential, or student accommodation in recent years, some of which are currently in the process of being determined.
- 5.06 Application 18/01073/FUL on the application site also demonstrates a continuing industrial character on the site amidst the surrounding redevelopment ambitions, as the Port Dundas masterplan consent had already been approved at the time that this application was granted.



6.00 Planning Policy Assessment

6.01 The current Development Plan for this site comprises:

- Glasgow City Development Plan (CDP; 2017); and
- National Planning Framework 4 (NPF4; 2023).

Site Allocation

6.02 The applicable policies for the site in both the NPF4 and the Glasgow CDP are determined by the allocation in the CDP and nature of proposed Development. The below map extract shows the relevant development allocations for the site.

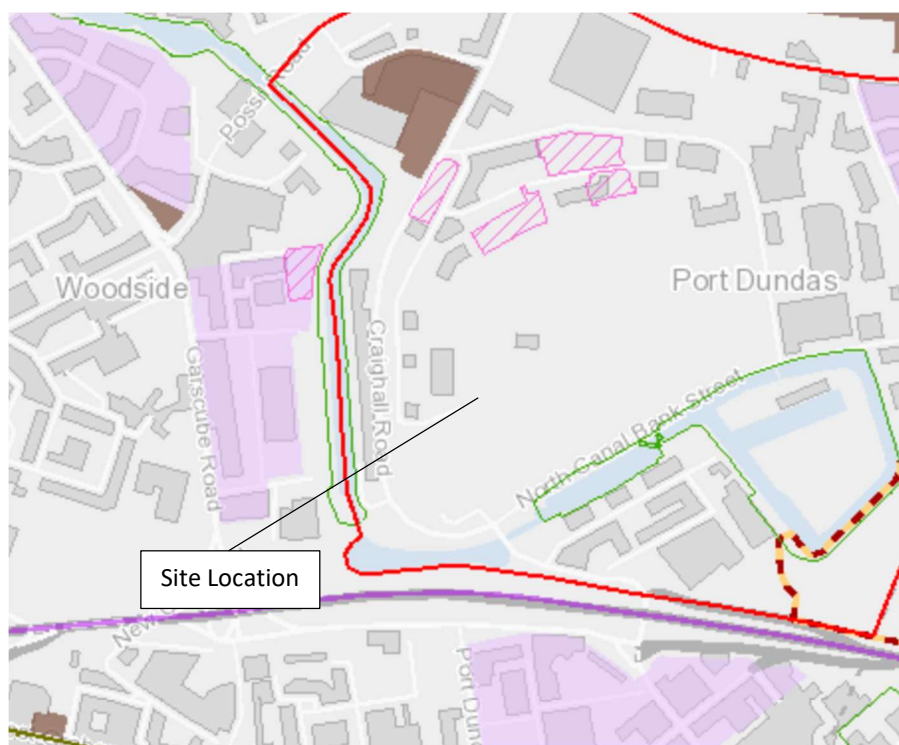


Figure 4 Glasgow CDP Policy Map Extract

6.03 The site is allocated within a Masterplan Area, indicated by the red outline around the wider Port Dundas area. The site is also in close proximity to historical features, indicated by the green outlines around the canal basin to the southeast and Speir's Wharf to the west of the site. Although the wider area is allocated as a Masterplan Area, a number of parcels of land within this are identified as business/industrial development opportunity sites, to complement the existing business and industrial uses in this location. These sites are shown as areas with pink cross-hatching over them. This demonstrates that the policy intention is for this part of the Masterplan area to remain in business and industrial use.



Glasgow City Development Plan (2017)

- 6.04 The Glasgow CDP has two overarching policies that are applicable to all new development. These are Policies CDP1 and CDP2. The remaining policies of the plan are applicable based on various designations, allocations, or the type of development proposed.
- 6.05 **CDP1: The Placemaking Principle** states that *“new development should aspire to achieve the six qualities of place”* as defined in Scottish Government policy. It is further expected that new development should achieve a number of aims, including *“delivering sustainable buildings, area and spaces”, “providing high quality amenity to existing and new residents in the City”, “bringing ... vacant and derelict land back into effective use”, “ensuring new activity does not result in the deterioration of air quality”, and “ensuring new activity does not introduce unacceptable additional noise”*.
- 6.06 CDP1 is generally an over-arching policy for new development in Glasgow. Not all provisions of the Policy are relevant, but of those listed above, which are regarded to be applicable, the proposal is regarded to accord with these. BESS schemes are sustainable in that they allow energy to be stored from the grid and released at times of high demand. As the national electricity grid becomes more dependent on renewable sources of energy, balancing this demand between times of high generation (specifically windy and sunny days) and high demand (night time and colder days) will become more crucial. The proposed BESS scheme will play a significant role in this process, and its location adjacent to the Port Dundas substation is important in order to minimise disruption caused by the creation of new cabling routes between substations and BESS developments.
- 6.07 As demonstrated in the accompanying suite of technical documents and assessments, the development is not regarded to have significant negative impacts on amenity in the surrounding area. Noise emissions from the development will be minimal and will be below the ambient background levels, including at night. Similarly, there are no adverse air quality impacts, as the proposal does not create any emissions (there is no smoke or steam emitted from the battery units). The development site is also currently in industrial use. Though the site is not currently vacant or derelict, it is brownfield in that it is previously developed. The proposed development is for a higher-amenity industrial use on the site and ensures sustainable use of land in Glasgow by not utilising a greenfield site.
- 6.08 In respect of the above, the proposal is regarded to accord with Policy CDP1.
- 6.09 Further guidance in respect of CDP1 is given in the relevant Supplementary Guidance, **SG1**. SG1 is split into two parts, with Part 2 containing the most relevant technical guidance and policy for various types of development. Section 4 relates to Amenity, and contains provisions related to various types of potential impacts.
- 6.10 In relation to air quality, the Guidance states that *“new development should not result in the deterioration of air quality”*. The Guidance aims to:



- a) *ensure air quality is properly considered in the planning process and identify developments where air quality may be a material consideration;*
- b) *identify developments where an air quality assessment will be required;*
- c) *provide guidance on the process of air quality assessment; and*
- d) *set out the Council's approach to the use of planning conditions and planning obligations in respect of air quality.*

- 6.11 The proposed development does not create any emissions as part of its operation, and therefore there will be no adverse impact on air quality or associated impacts on local residents.
- 6.12 In terms of noise impact, it is advised that further detailed guidance will follow that will assist developers and noise consultants in undertaking their assessments to ensure that all noise (and vibration) impact is fully scoped and assessed, and any impacts appropriately mitigated.
- 6.13 It is considered that this is provided in this application submission, as a full Noise Impact Assessment is included. This demonstrates that there will be no unacceptable noise impact arising from the proposed development.
- 6.14 The site is allocated as a Masterplan Area in the proposals map extract shown in Figure 2 above. The relevant policy for Masterplan Areas is **CDP2: Sustainable Spatial Strategy**, which is also an overarching policy of the City Development Plan. This Policy aims to influence the location and form of new development to support sustainable development. Where one is applicable to a particular location in the Council area, development will be expected to accord with a relevant Spatial Development Framework (SDF), and any more-localised masterplans or development briefs. The application site and Port Dundas as a whole falls within the North Glasgow SDF. As highlighted in Section 4 above, the application site is adjacent to a masterplanned area, which was approved under application ref: 16/01330/DC.
- 6.15 The North Glasgow SDF sets out a spatial strategy for the area, an extract of which is shown below:

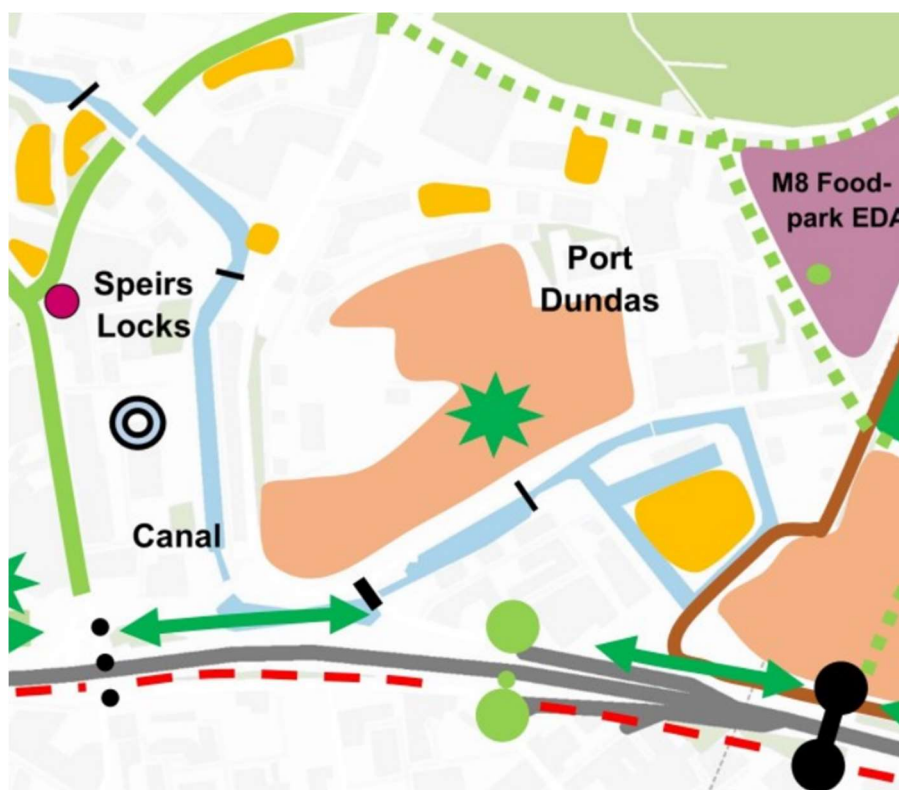


Figure 5 North Glasgow Strategic Development Framework plan extract

- 6.16 The diagram shows the site boundaries of the masterplan approved under application 16/01330/DC, indicated by the orange area, which represents land with support for “large scale housing development”. Though this is a strategic diagram showing the general location of types of development, and does not conform to strict boundaries, it is regarded to generally show the boundaries of the Port Dundas masterplan area as they are shown on the location plan for that application. The application site is indicated to be outwith the area allocated for housing on this plan. The masterplan area is also identified as having potential to support open space accessibility and quality improvements.
- 6.17 The North Glasgow SDF contains a number of development principles that apply to development in the area. **PR54** supports the “*evolution of Port Dundas into a creative and sustainable mixed-use neighbourhood, where established industrial uses are complemented by existing/new commercial, canal leisure and residential developments.*” This principle supports established industrial uses in association with commercial and residential uses.
- 6.18 As the application site is located outwith the masterplan area (the large-scale housing development shown on Figure 7), and there are no specific development ambitions indicated for the site itself, it is regarded that, as per CDP1, development will be expected to have no negative impact on the amenity of nearby properties or infringe on the development potential of the masterplan area.



- 6.19 As discussed in Paragraph 6.07 above, the proposed development will not have any significant adverse impacts on amenity. The BESS will not create any adverse noise above the ambient background levels, and will also not create any emissions that would impact on air quality. The site is currently in use as a concrete batching plant, and though the proposed use is also industrial in nature it is regarded to be a higher-amenity industrial use and one that will create a more attractive visual setting on and around the site, with the use of landscaping and the unobtrusive appearance of the battery containers. The proposed use is not regarded to impact on the attractiveness or viability of the Port Dundas masterplan or the North Glasgow SDF, and is considered to be consistent with the aims and outcomes of this. Therefore, the proposal is considered to accord with CDP2.
- 6.20 **CDP5: Resource Management** sets out Glasgow City Council's approach to new low/zero carbon energy and electricity infrastructure. The Policy acknowledges that, to allow the Council to make a contribution towards meeting Scottish Government targets and goals on renewable energy infrastructure, *"installation of a wide range of renewable energy technologies, including energy storage, will be required"*. Among the aims of CDP5, it is stated that the policy intends to *"support energy generation from renewable and low carbon sources"*.
- 6.21 Much of the detail of CDP5 is set out in the Supplementary Guidance document, **SG5: Resource Management**. Paragraph 2.3 of this Guidance states that *"subject to assessment against the following paragraphs, the Council will generally support proposals that contribute to reducing greenhouse gas emissions and overall energy use and which facilitate the efficient delivery of renewable energy..."*. The guidance referred to in paragraph 2.3 is set out in paragraph 2.5. For ease of presentation, these criteria have been set out in the below table, and a response to each provided accordingly.

| | Criteria | Response |
|----|---|--|
| a) | <i>net economic impact, including local and community socioeconomic benefits such as employment, associated business and supply chain opportunities</i> | <p>The proposed BESS is a relatively inert development that does not generate a significant amount of economic benefit beyond the job creation of the construction stage. However, there are jobs supported by the remote management, maintenance, and securing of the site. The development makes a broader contribution to the decarbonisation of the energy grid, which has economic benefits when considered on a broader scale and in association with other low-carbon energy developments across the grid.</p> <p>The site is currently occupied by a concrete batching plant, which is a low-amenity industrial use and is in close proximity to residential properties. The replacement of this with a higher-amenity use such as a</p> |



| | Criteria | Response |
|----|--|---|
| | | BESS, which has no significant adverse air quality or noise impacts, is regarded to be a social benefit due to the positive impact on residential amenity in comparison to the existing use. |
| b) | <i>the scale of contribution to renewable energy generation targets and effect on greenhouse gas emissions</i> | The proposed BESS has a storage capacity of 90MW, which is a significant contribution towards wider green energy targets, and will play a role in balancing the energy grid. The facility will allow for the storage of energy from the grid at times of high-generation, and for this energy to be released back into the grid when demand is high. As the overall mix of energy-generation in the Scottish and UK energy grid progresses even further towards majority renewable-led, the role of storage facilities such as this will become more crucial, and therefore the development plays a large role in this. |
| c) | <i>impacts on local air quality</i> | The proposed development does not create any emissions and therefore will have no significant adverse impact on air quality. Compared to the existing use of the site as a concrete batching plant, the proposed BESS has a net-positive impact on local air quality conditions. |
| d) | <i>impacts on communities and individual dwellings, including on residential amenity</i> | The site to the southeast of the application site is occupied by flatted residential dwellings, and there is further intent to develop the land directly to the south for residential purposes. The proposed development will not have any adverse impact on the amenity of these dwellings, from a noise, air quality, or visual impact perspective. As mentioned above, given the current condition and use of the site for a concrete batching plant, the proposal is regarded to have a net-positive impact on these current and |



| | Criteria | Response |
|----|--|--|
| | | future dwellings, and the amenity of residents. |
| e) | <i>proximity to transport routes, buildings and open spaces</i> | The proposed development site is accessed via Mary Street to the southwest of the site. There are buildings in close proximity to the southeast of the site, but for the reasons outlined above the proposed development is not regarded to impact negatively on these. |
| f) | <i>noise, vibration, shadow flicker, glint and glare</i> | <p>The proposed development will not generate any adverse noise impact that would make it audible over ambient background levels, as demonstrated by the accompanying Noise Impact Assessment.</p> <p>The nature of the development is static containers with the batteries within these, and so there is no vibration, shadow flicker, glint, or glare created by the development.</p> |
| g) | <i>landscape and townscape impacts</i> | <p>The proposed development will have minimal landscape/townscape visual impact. The containers sit at a low-level and will not protrude into the skyline or create any unacceptable visual impacts. The accompanying LVIA demonstrates this.</p> <p>The containers are below the height of the existing features of the concrete batching plant, and therefore there is a net-positive impact in this regard.</p> |
| h) | <i>visual impacts, including those relating to the design of the development</i> | As shown in the accompanying LVIA, the development is regarded to have minimal visual impact, due to the context of the site and landscape screening that will be provided. The battery units themselves are contained within containers of standard size and appearance, and therefore there is not regarded to be any significant negative visual impact. |



| | Criteria | Response |
|----|--|---|
| i) | <i>effects on the natural heritage, including birds, woodlands and trees, open space and the Green Network, including how the development would enhance biodiversity and the Green Network</i> | The site is currently occupied by an industrial use, and therefore the development would be considered a brownfield development opportunity. There is limited existing green infrastructure or biodiversity value on the site, besides a small number of trees in the west of the site. As identified in the accompanying Tree Survey Report, these are of limited quality and not of any particular biodiversity value. The proposal includes a landscaping plan, which will enhance biodiversity on the site. A Preliminary Ecological Appraisal has been undertaken for the site which identified no habitats or protected species. |
| j) | <i>impacts on carbon rich soils and peatland</i> | There are no carbon rich soils or peatland on the site. |
| k) | <i>public access, including impact on long distance walking and cycling routes and scenic routes identified in the NPF</i> | There are no public access issues associated with the site or the proposal. |
| l) | <i>impacts on the historic environment, including scheduled monuments, listed buildings and their settings and conservation areas</i> | There are a number of Listed Buildings to the west of the site at Speirs Wharf, and listed features associated with the canal to the southwest of the site. The proposed development does not directly adjoin any of these features and there is other built development between the site and these features. Additionally, the proposal is considered to have minimal visual or townscape impact due to its physical appearance and landscape screening. The accompanying Archaeological Assessment confirms that none of the identified heritage assets are likely to be affected by the proposed development due to their distance from the site and the nature of the proposed development. Therefore, the proposal is not regarded to impact on any historic environment assets. |



| | Criteria | Response |
|----|--|---|
| m) | <i>impacts on tourism and recreation</i> | The proposal will not impact on any tourist or recreational features. |
| n) | <i>impacts on aviation, defence interests and seismological recording</i> | The proposal will not have any impacts on aviation, defence, or seismological recording assets. |
| o) | <i>impacts on telecommunications and broadcasting installations, particularly ensuring that transmission links are not compromised</i> | The proposal will not have any impact on telecommunications and broadcasting features. |
| p) | <i>impacts on trunk roads and on the generation of road traffic and its associated impacts on communities</i> | The application is accompanied by a Transport Statement, which demonstrates that there is no adverse impact on roads around the site and there is minimal traffic generation. Due to the nature of the existing site, the proposed development would represent a reduction in vehicle trips associated with this location. While there may be some additional traffic generation associated with the construction of the site, this will be limited and temporary, and therefore overall impact on the road network will be negligible. |
| q) | <i>effects on hydrology, the water environment and flood risk</i> | There is no risk of flooding associated with this site, from river, surface or coastal sources. The nature of the development is not regarded to enhance this risk. A Drainage Strategy has been prepared and Drainage Impact Assessment submitted in support of this application. This demonstrates that a sustainable drainage system will be provided at the site that provides a betterment position to the currently drainage provision serving the existing concrete batching plant use. |
| r) | <i>the need for conditions relating to the decommissioning of developments, including ancillary infrastructure, and site restoration</i> | The proposed development will be operational for a period of 40 years, a matter which can be enforced by condition. Following the expiry of this period the infrastructure will be |



| | Criteria | Response |
|----|--|---|
| | | removed, made possible by their temporary nature as shipping containers, and the site will be restored to a suitable and appropriate condition. Details of this remediation can be requested and secured via planning condition if deemed necessary. |
| s) | <i>opportunities for energy storage</i> | The proposed development is a battery energy storage scheme, and therefore by its very nature provides significant opportunities for energy storage. The development would play a significant role in balancing the grid and allowing storage of renewably-generated electricity until such time as it is required. |
| t) | <i>for wind energy developments, the Spatial Framework for Wind Energy</i> | The proposal is not a wind-energy development. |
| u) | <i>cumulative impacts</i> | <p>Paragraphs 2.8-2.9 of SG5 set out how cumulative impacts will be considered. This states that, “<i>in determining the acceptability of a proposal, the Council will wish to consider the cumulative effect of the following in particular:</i></p> <ul style="list-style-type: none">a) <i>The scale, number and distribution of developments in the area;</i>b) <i>Impacts on the character and quality of landscape or townscape;</i>c) <i>Visual impact where two or more renewable energy developments will be visible from the same point, or will be visible sequentially along the same journey;</i>d) <i>Impacts on local communities in terms of amenity, noise, vibration, air quality and intensification of use of local infrastructure.”</i> |



| | Criteria | Response |
|--|----------|--|
| | | <p>There are no other known BESS developments in close proximity to the site, and therefore there is regarded to be minimal cumulative impact in this regard. There are other developments of an alternative nature (such as residential and commercial uses), however this is regarded to be appropriate for the high-density nature of the location, and the proposal will not have a negative impact on, or in association with these, due to a general lack of negative outputs.</p> <p>As there are no other renewable energy developments in close proximity to the site, there is not expected to be a location where this development would be visible along with any other. Regardless, the proposed use has no significant visual impact due to the design and scale of the development and the use of landscape screening. For the same reason it is not anticipated to have a cumulative impact on townscape or landscape appearance.</p> <p>Finally, the proposed development has no significant adverse noise or air quality impacts. The proposed development is industrial in nature, but occupies an existing industrial development site and replaces the existing low-amenity industrial use on the site with a higher-amenity use. There is therefore not regarded to be any risk of cumulative impact from other outputs of the development in conjunction with any other scheme of another nature. The Screening Opinion issued by the Energy Consents Unit states that it was considered unlikely that any cumulative impacts would arise from the development.</p> |

Table 3 Assessment against SG5 energy development criteria



6.22 Therefore, the proposed development is regarded to accord with the criteria for energy developments set out in Paragraph 2.5 of SG5, and therefore complies with the relevant planning policy for this use.

National Planning Framework 4 (NPF4)

6.23 NPF4 was adopted in February 2023 and forms part of the development plan, along with the City Development Plan. The relevant policies of NPF4 are considered below.

6.24 **Policy 1 (Tackling the climate and nature crises)** applies to all new development and states that:

“When considering all development proposals significant weight will be given to the global climate and nature crises.”

6.25 Similarly, **Policy 2 (Climate mitigation and adaptation)**, as relevant to this policy states that:

- a) Development proposals will be sited and designed to minimise lifecycle greenhouse gas emissions as far as possible.*
- b) Development proposals will be sited and designed to adapt to current and future risks from climate change.*

...

6.26 The proposed development is regarded to accord with these policies. The development makes a significant contribution to the Scottish Government goal of achieving Net Zero by 2045 by contributing towards decarbonising the energy grid, and providing much needed energy storage capacity for the growing use of renewable energy. The development will provide up to 90MW of storage capacity, making a major contribution towards energy storage capacity in and around Glasgow.

6.27 There are few operational concerns regarding the location of the development and the production of greenhouse gases, as the proposal will not generate significant vehicle trips or trips of any kind. Regardless, the proposal is considered to accord with both Policies 1 and 2.

6.28 **Policy 3 (Biodiversity)** is also relevant to all new development, and states that:

- a) Development proposals will contribute to the enhancement of biodiversity, including where relevant, restoring degraded habitats and building and strengthening nature networks and the connections between them. Proposals should also integrate nature-based solutions, where possible.*
- b) Development proposals for national or major development, or for development that requires an Environmental Impact Assessment will only be supported where it can be demonstrated that the proposal will conserve, restore and enhance biodiversity, including nature networks so they are in a demonstrably better state than without intervention. This will include future management. To inform this, best practice assessment methods should be used. Proposals within these categories will demonstrate how they have met all of the following criteria:
 - i. the proposal is based on an understanding of the existing characteristics of the site and its local, regional and national ecological context prior to development, including the presence of any irreplaceable habitats;**



- ii. *wherever feasible, nature-based solutions have been integrated and made best use of;*
 - iii. *an assessment of potential negative effects which should be fully mitigated in line with the mitigation hierarchy prior to identifying enhancements;*
 - iv. *significant biodiversity enhancements are provided, in addition to any proposed mitigation. This should include nature networks, linking to and strengthening habitat connectivity within and beyond the development, secured within a reasonable timescale and with reasonable certainty. Management arrangements for their long-term retention and monitoring should be included, wherever appropriate; and*
 - v. *local community benefits of the biodiversity and/or nature networks have been considered. ...*
- d) *Any potential adverse impacts, including cumulative impacts, of development proposals on biodiversity, nature networks and the natural environment will be minimised through careful planning and design. This will take into account the need to reverse biodiversity loss, safeguard the ecosystem services that the natural environment provides, and build resilience by enhancing nature networks and maximising the potential for restoration.*

- 6.29 The proposed development complies with Policy 3 as it provides biodiversity enhancement of the site through the on-site landscaping scheme. The site is currently a brownfield location with existing industrial activity ongoing. It therefore has limited, if any, biodiversity value in its current form and the proposed development will naturally enhance this.
- 6.30 The accompanying Landscape Plan and Statement on Opportunities for Biodiversity Gain (included within the Preliminary Ecological Appraisal) demonstrate the scale and extent of the planting on site, and the measures proposed to enhance biodiversity. These are regarded to demonstrate sufficient biodiversity enhancement that Policy 3 is complied with.
- 6.31 There is a small area of trees in the western part of the site. This requires consideration of **Policy 6 (Forestry, woodland and trees)**, which states, inter alia, that:
- b) *Development proposals will not be supported where they will result in:*
 - i. *Any loss of ancient woodlands, ancient and veteran trees, or adverse impact on their ecological condition;*
 - ii. *Adverse impacts on native woodlands, hedgerows and individual trees of high biodiversity value, or identified for protection in the Forestry and Woodland Strategy; ...*
- 6.32 None of the trees on the application site are subject to any statutory protections, designated as ancient woodland, or are regarded to be of high biodiversity value. This is supported by the Tree Survey that accompanies this application, and therefore any works involving the removal or trimming back of trees are regarded to be supported, particularly when the replacement planting that amounts to a significant biodiversity enhancement on the site is taken into consideration.



- 6.33 **Policy 9 (Brownfield, vacant and derelict land and empty buildings)** is relevant due to the nature of the site as previously developed site that is currently in use. Though the site is not “vacant”, redevelopment of it would be considered brownfield. Policy 9 states, inter alia, that:
- a) Development proposals that will result in the sustainable reuse of brownfield land including vacant and derelict land and buildings, whether permanent or temporary, will be supported. In determining whether the reuse is sustainable, the biodiversity value of brownfield land which has naturalised should be taken into account. ...*
- 6.34 Therefore, given the current use of the site and the nature of the development as brownfield, the proposal would benefit from the support of Policy 9. The use of the site as a BESS development is regarded to be self-evidently a “sustainable” reuse of the land.
- 6.35 **Policy 11 (Energy)** is applicable based on the nature of the proposal. This states that:
- a) Development proposals for all forms of renewable, low-carbon and zero emissions technologies will be supported. These include:*
- ...
- iii. energy storage, such as battery storage and pumped storage hydro;*
- ...
- e) In addition, project design and mitigation will demonstrate how the following impacts are addressed:*
- i. impacts on communities and individual dwellings, including, residential amenity, visual impact, noise and shadow flicker;*
 - 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;*
 - iii. public access, including impact on long distance walking and cycling routes and scenic routes;*
 - iv. impacts on aviation and defence interests including seismological recording;*
 - v. impacts on telecommunications and broadcasting installations, particularly ensuring that transmission links are not compromised;*
 - vi. impacts on road traffic and on adjacent trunk roads, including during construction;*
 - vii. impacts on historic environment;*
 - viii. effects on hydrology, the water environment and flood risk;*
 - ix. biodiversity including impacts on birds;*
 - x. impacts on trees, woods and forests;*
 - xi. proposals for the decommissioning of developments, including ancillary infrastructure, and site restoration;*
 - 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*
 - xiii. cumulative impacts.*
- 6.36 Policy 11 explicitly supports BESS proposals, as set out in a) iii., and therefore the proposal is supported by the policy.



- 6.37 Each of criteria set out in part e) have already been addressed in Table 2 of this Statement in response to SG5, and so will not be repeated here. The information in Table 2 is regarded to satisfy all the criteria i. – xiii. set out in Policy 11 e).
- 6.38 All new development is subject to **Policy 14 (Design, quality and place)**, which states that:
- a) *Development proposals will be designed to improve the quality of an area whether in urban or rural locations and regardless of scale.*
 - b) *Development proposals will be supported where they are consistent with the six qualities of successful places:*
 - Healthy:** *Supporting the prioritisation of women’s safety and improving physical and mental health.*
 - Pleasant:** *Supporting attractive natural and built spaces.*
 - Connected:** *Supporting well connected networks that make moving around easy and reduce car dependency*
 - Distinctive:** *Supporting attention to detail of local architectural styles and natural landscapes to be interpreted, literally or creatively, into designs to reinforce identity.*
 - Sustainable:** *Supporting the efficient use of resources that will allow people to live, play, work and stay in their area, ensuring climate resilience, and integrating nature positive, biodiversity solutions.*
 - Adaptable:** *Supporting commitment to investing in the long-term value of buildings, streets and spaces by allowing for flexibility so that they can be changed quickly to accommodate different uses as well as maintained over time. ...*
 - c) *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.*
- 6.39 The policy states that new development is expected to be designed to improve the quality of an area. As stated previously in this statement, the proposal is designed in a way that improves the quality of the surroundings, in part by replacing a low-amenity industrial use with a higher-amenity one. The existing use is regarded to have significant impacts on air quality and noise in the local area, and particularly given the proximity to residential properties. As demonstrated in the accompanying Noise Impact Assessment and in this statement, the proposed development will not have any significant adverse impacts, and given the existing use is an improvement on current amenity.
- 6.40 The six qualities of successful places outlined in part b) of the Policy are of limited relevance to the proposal as the development is not one that will be actively used by members of the public. It is a functional energy facility, and the design and layout of the site reflects this and the health and safety standards that the proposal is expected to meet. Insofar as these are applicable to the proposal, it is regarded that the development demonstrates healthy outcomes due to the aforementioned improved air quality and noise outcomes, both of which can have significant impact on human physical and mental health. The site will be pleasant and attractive to view, with the use of landscaping creating an attractive boundary to the site composed of trees, bushes, and other foliage. The proposal has minimal connectivity needs, though it is connected to the local road network and can be accessed this way for construction and maintenance purposes. As the design of the site and the battery units is informed primarily by practical considerations, there is limited



distinctiveness in the design of the site; however, the landscaping scheme, which is the most visually prominent feature of the site to most in the surrounding area, will utilise a number of locally native species, and therefore be naturally distinctive. By its nature, the development is sustainable, and the use of on-site SUDS and landscaping contributes towards this. Finally, the development site is adaptable as the proposal is intended to be time-limited, and conditions can be used to secure the remediation of the site once the development has ceased. The site can therefore be reused for an alternative purpose in the future.

6.41 Therefore, insofar as it is relevant, the proposal is regarded to accord with Policy 14.

6.42 There are no other policies of NPF4 that are considered to be applicable to the site or the proposed development. Therefore, the proposal is considered to accord with NPF4.

Material Considerations

6.43 The **Draft Energy Strategy and Just Transition Plan** was published by the Scottish Government in January 2023. The document identifies that a transformation is needed in the way Scotland generates, transports, and uses energy in order to meet climate change ambitions. The draft Strategy has a number of ambitions for Scotland to provide *“energy security through development of our own resources and additional energy storage”*. This places the provision of energy storage on a level importance to the national energy security strategy as the provision of new energy resources and generating technology.

6.44 The Strategy identifies that *“building in flexibility to respond to changing levels of supply and demand”* is crucial to the future operation of a decarbonised energy grid. Grid scale battery storage is identified as a technology that can increase this flexibility, but the strategy acknowledges that there is a *“need to significantly increase this capacity”*.

6.45 The proposed development is regarded to be consistent with the aims and ambitions of the Draft Energy Strategy and Just Transition Plan. This document establishes the significant role that new BESS development will play in the future of Scotland’s energy grid and explicitly states that capacity should be significantly increased. BESS is identified as being as important as creating self-sufficient energy resources and plays a significant role in Scotland’s energy security strategy, and carbon-reduction ambitions.

6.46 Published by the UK Government, the **British Energy Security Strategy** (April 2022) sets out the energy priorities on a UK-wide scale. The document has some relevance to decision-making in Scotland. While most energy policy matters are reserved to the UK Government, renewable energy policy is a devolved matter. Nonetheless, the British Energy Security Strategy is regarded to be a relevant consideration to the proposal.



- 6.47 This states that the UK Government will “ensure a more flexible, efficient system ... [by] encouraging all forms of flexibility with sufficient large-scale, long-duration electricity storage to balance the overall system by developing appropriate policy to enable investment”. While it does not appear that an investment policy has yet been developed by the UK Government, this can be read as expressing support for such schemes where investment from the private sector is forthcoming, given it is evidently something that the UK Government wishes to encourage.
- 6.48 This is the only mention of either energy storage or BESS in the British Energy Security Strategy, but this is regarded to offer support for the development, by indicating that government seeks to encourage electricity storage proposals to come forward.
- 6.49 The Scottish Government’s **Energy storage: planning advice** was published in February 2011 and updated in December 2013. Due to the age of this document, much of the advice and guidance can be considered to be somewhat out of date, and battery storage is not mentioned in the document. Despite this, the guidance supports the principle of developments for energy storage, acknowledging that “if the energy sector is to maximise environmental, economic and social benefits, renewable energy will need to be linked to energy storage”. The guidance goes on to state that “it is ... 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”.
- 6.50 Insofar as it is relevant and applicable to a BESS development, the above planning advice is therefore regarded to support the proposal.
- 6.51 The **Programme for Government 2024-25**, published by the Scottish Government in September 2024, sets out the Scottish Government’s priorities and commitments over the next year. It does not explicitly reference BESS developments, but does express a wider ambition to increase renewable energy generating capacity and deliver a “clean energy pipeline”.
- 6.52 Among the actions to progress this, the Government are committed to improving “the planning and consenting regime for renewable energy generation and electricity transmission to provide certainty to the market and stimulate the private investment needed”, by “improving the consistency and pace of the consenting process for proposals over 50MW ... and reducing the timescales for section 36 and 37 determinations.”



7.00 Statement of Community Benefits

Community Wealth Building Requirements

National Planning Framework 4

7.01 Part (C) of Policy 11: Energy of National Planning Framework 4 (NPF4) details 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.”

7.02 Policy 25 of NPF4 relates to Community Wealth Building. Part (A) of Policy 25 states that:

“Development proposals which contribute to local or regional community wealth building strategies and are consistent with local economic priorities will be supported. This could include for example improving community resilience and reducing inequalities; increasing spending within communities; ensuring the use of local supply chains and services; local job creation; supporting community led proposals, including creation of new local firms and enabling community led ownership of buildings and assets.”

Glasgow City Council Community Wealth Building Strategy

7.03 In 2022, Glasgow City Council published their Strategic Plan to cover the period between 2022 – 2027. This Strategic Plan set out the Council’s vision for the city as well as the key priorities and actions. One of the Council’s missions identified within the strategy is to support the growth of innovative, resilient and net zero carbon economy. To achieve this mission, the Council has identified the following community wealth building actions:

- Create a Community Benefits repository where local organisations can identify potential community benefits for inclusion in relevant contracts, and ensure all local regeneration schemes provide clear social and sustainability benefits.
- Develop a Social Infrastructure Investment programme. Build community wealth and empowerment by including the community and voluntary sector, social enterprises, credit unions, and co-operatives in business support services, ensure economic benefits are equally spread.
- Develop and implement a Community Wealth Building Strategy for Glasgow, ensuring that social, economic and sustainability benefits are felt locally in all of our communities.

7.04 The proposed BESS development will assist Glasgow City Council in meeting their net zero targets. Fig Power is committed to working with Glasgow City Council to identify local organisations and initiatives to partner with to deliver community wealth building opportunities.



Fig Power's Commitment to Help Deliver Glasgow City Council's Community Wealth-Building Vision

- 7.05 This section of the report provides an overview of how Fig Power intends to support the Glasgow City Council's strategic aim to create an inclusive economy, by retaining greater wealth and maximising spending within and for the communities of Glasgow. This will be achieved by leveraging organisational resources and fostering local employment and supply chain opportunities wherever possible.
- 7.06 Fig Power will strive to ensure that, as much as reasonably possible, every local project pound spent flows through the local supply chain, ensuring they can help *keep the local pound local*.
- 7.07 This section of the report also highlights how battery storage supports the UK's and Scottish Governments Net Zero aspirations and outlines the development and delivery model, emphasising the importance of local community benefits from a grassroots level helping ensure continuing community cohesion and safety.
- 7.08 Fig Power aims to ensure that the Port Dundas Battery Energy Storage project is fully committed to embedding community wealth building into its project strategy from the outset and in line with the Glasgow City Council's community benefit and local employment and training policies and initiatives. Although this project does not directly generate renewable energy or benefit from renewable government subsidies, it plays a vital role in storing excess power from renewable sources, ensuring grid stability and resilience as part of a wider energy ecosystem and Glasgow City Council's drive to become less reliant on the continuing use of fossil fuels.

Fig Power's Key Commitments to the Port Dundas Battery Storage Project in Support of Community Wealth Building Strategy

- 7.09 Outlined below are key commitments Fig Power are proposing to make to help ensure they can:
- i. Focus our recruitment efforts on the individuals who are furthest removed from the workforce.
 - ii. Prioritise advertising business opportunities within the Glasgow City Region whenever possible.
 - iii. Leverage local SME'S networks across the Glasgow City Region to ensure project spending remains as local as possible.

Maximising Local Economic Impact and Employment (Policy 11 & 25, NPF4)

- 7.10 The Port Dundas BESS project is expected to have an anticipated capital spend of approximately £45 million and aims to support Glasgow City Council's Community Wealth Building strategy by ensuring that local economic opportunities are enhanced.
- 7.11 *Local Employment Creation:* It is estimated that the project will create several local job opportunities during construction and operation, including the best estimates below at this time:



- i. Direct Jobs: an estimate of 40 full-time equivalent jobs, mainly during construction and site supervision over circa 18 months.
- ii. Indirect Jobs: including those in the supply chain mainly during construction preparation and construction itself.
- iii. Related Jobs: a sizeable number of short-term jobs created through local spending from supply chain to day-to-day spend for all site and related staff.

7.12 Fig Power will collaborate with all local public employment agencies to ensure where possible, a targeted recruitment process for locals who may be furthest removed from the workforce and/or seeking apprentice opportunities.

Prioritising Local Supply Chains and Environmental Stewardship (Policy 25, NPF4)

7.13 In support of Policy 25 of NPF4 and Glasgow City Council's social benefit and procurement strategies, Fig Power will as much as possible engage with and prioritise local contractors and suppliers where commercially viable. Key sectoral spends are included but are not restricted to:

- i. Construction: Making Full use of all local Glasgow City Region construction sectors.
- ii. Procurement: Engaging with local SME suppliers for maintenance, ecology and tree management, and all other day-to-day services.
- iii. Exploring the potential of a meet the buyer's event in the area to stimulate interest and share information as widely as possible as early as possible.

7.14 This Battery Storage project will deliver on-site biodiversity enhancements through the landscaping and planting proposals, thus improving the environmental stewardship of the site and helping contribute to the Council's commitment to become carbon neutral.

Supporting the Community Through Flexible Contributions

7.15 Fig Power intends to support Glasgow City Council's community benefit and procurement strategies. Although Battery Storage projects like Port Dundas do not qualify for renewable subsidies, we are committed to supporting community-led initiatives. Through a proactive dialogue with the Council, Fig Power are open to exploring and supporting locally based projects in Glasgow, which may include payment-in-kind work from our team to help build much-needed community capacity.

7.16 Fig Power would seek to enter into discussions with Glasgow City Council to obtain guidance on the identification of community groups and initiatives to engage with.



Grid Resilience and Environmental Benefits (Climate Change, NPF4 & Net Zero Goals)

- 7.17 The Port Dundas Battery Storage Project will contribute to Glasgow City Council's wider strategic and climate goals by enabling greater use of renewable energy and reducing the reliance on fossil fuels. This project:
- i. Improves grid resilience by balancing supply and demand, ensuring that excess renewable energy is stored and utilised efficiently.
 - ii. Helps reduce curtailment costs by switching off turbines when necessary.
 - iii. Supports climate change mitigation by enabling more consistent use of renewable energy, contributing to the region's Net Zero ambitions in alignment with NPF4 Policies on climate and socio-economic benefits.

Training and Skills Development

- 7.18 Fig Power wants to engage through any existing community planning partnerships with local schools and higher education institutions, to offer students the opportunity to see and visit our project site and witness how curriculum concepts come alive. Fig Power wants to engage and share with students, what and how they build, design and operate this project from the very outset.
- 7.19 There is a commitment to ensuring as much as possible that all supply chain partners have in place training and development plans and opportunities for all and actively bring on new apprenticeships in support of this project.
- 7.20 There is also a desire to explore the potential of a Council Officer and or intern "shadowing" our local team and site development as part of their personal development and career plan, as we are all only too aware of the shortage of skills in the energy sector.



8.00 Summary and Conclusions

- 8.01 This Planning Supporting Statement has been prepared by Graham + Sibbald LLP on behalf of Fig Power Ltd in support of an application for the erection of a battery energy storage facility with capacity of 90MW and associated infrastructure at Land at Mary Street, Craighall Business Park, Glasgow, G4 9UD.
- 8.02 The application is made under Section 36 of the Electricity Act 1989 and deemed planning permission is sought under Section 57(2) of the Town and Country Planning (Scotland) Act 1997. This Planning Supporting Statement sets out an assessment of the Proposed Development against the Glasgow City Development Plan and National Planning Framework, as well as all relevant material considerations.
- 8.03 The application site is located within an established business and industrial area. The site is within a defined Masterplan Area in the Glasgow City Development Plan. The detail of this masterplan indicates that the site is located adjacent to the area where the masterplan consent was granted for a residential-led development. Some of this masterplan area has been developed and is occupied by residential uses, including land to the southeast of the site. The application site itself has never been within any consented masterplan area or subject to any planning consents for alternative use, and is currently in industrial use as a concrete batching plant.
- 8.04 By its nature, the scheme will have minimal impact on local residential amenity. The site's current use as a concrete batching plant is a low-amenity industrial use by Glasgow City Council's own definition in planning policy guidance. The proposed use of the site for a Battery Energy Storage Scheme (BESS) will enhance this position, as the BESS does not create any air quality impacts and all noise emissions are below the existing ambient background levels (as demonstrated in the accompanying Noise Impact Assessment). Under the currently consented use, the site could continue to operate indefinitely as a concrete batching plant. The proposed development is an opportunity to enhance this position in relation to residential amenity. The proposal will provide a new on-site landscaping scheme which will offer biodiversity enhancement and screening of the site to ensure no visual impacts arise.
- 8.05 The proposed use of the site complies with relevant planning policies, and benefits from the explicit support of NPF4 Policy 11 (Energy). BESS developments will play a significant role in the decarbonisation of the energy grid at both a Scotland-wide and UK-wide scale, and there is a requirement for a pipeline of BESS developments to come forward to play a role in balancing the grid as the national energy supply becomes more dependent on renewable sources of energy.
- 8.06 The proposed development is therefore regarded to accord with the development plan and also benefits from material considerations in support of it. It is therefore considered that this scheme should be consented.