Planning, Design and Access Statement

Holmston Farm Energy Storage Facility

Applicant	Renewable Energy Systems Limited
Date	February 2023
Internal Ref	04874-4936436

Contents

1 Introduction

1.1 The Application

Renewable Energy Systems Limited (RES) ("the Applicant") has prepared this Planning Statement, including a Design and Access Statement, in support of a full planning application to South Ayrshire Council for an Energy Storage Facility (ESF) ("the Proposed Development") on land at Holmston Farm, Ayr, KA6 5JJ (northeast of Holmston Roundabout), ("the Site").

This statement outlines the context of the application site and surrounding area, and the need for the proposed development, including an assessment of how it accords with relevant national, regional and local planning policies as well as material considerations. It is supported by a number of drawings, technical documents and survey reports, a schedule of which has been included in Appendix A.

1.2 The Applicant

1.2.1 RES Group Experience

RES is the world's largest independent renewable energy company with 40 years' experience developing, constructing and operating renewable energy assets. RES has delivered more than 21GW of renewable energy projects across the globe and supports an operational asset portfolio of over 7GW worldwide for a large client base all under long term contracts.

The Group's head office in Kings Langley, near London, is complemented by other offices across the UK including Glasgow, Gateshead, Truro, Cardiff and Larne. Internationally, RES has overseas subsidiary offices in France, Scandinavia, Australia, New Zealand, Canada, Turkey, Germany, and across the USA. The RES Group employs 3,000 staff. RES is a privately-owned company that grew out of the Sir Robert McAlpine group, a family-owned firm with over 130 years of experience in the construction and engineering sector. RES has strong in-house engineering and technical capability and operates in five main technology areas: on/offshore wind, solar, storage, green hydrogen and transmission & distribution.

1.2.2 RES Battery Energy Storage Systems Experience

Globally, RES is an industry leader in the delivery and operation of energy storage projects with 412MW of projects operational or in construction, and over 155MW of these in the UK and Ireland. RES has been named number 4 globally in energy storage integration by Navigant Research in 2019. RES has multiple professionals dedicated to energy storage and many others supporting across technologies, including in-house capability across all the following functions:

- Energy storage engineering and design
- Control systems (our RESolve platform)
- Procurement
- Construction/delivery
- Asset management and operations

RES's first battery storage facility in the UK was in 2016 and consisted of the 330kW Copley Wood Project. This was designed, constructed and operated by RES for Western Power Distribution and was integrated

into the existing solar farm infrastructure. In 2018, RES successfully handed over the Broxburn Battery Storage facility (20MW), the Port of Tyne Battery Storage facility (35MW) and Tynemouth Battery Storage facility (25MW) which RES designed and constructed using Samsung batteries and SMA inverters with associated civil and electrical works. RES has been retained as both the Asset Manager and O&M service provider for the projects which has been successfully delivering frequency response services to National Grid since 2018.

More recently, between 2020-2022, RES has successfully developed, consented and secured investment for: the 50MW Roaring Hill Project, in Fife; the 80MW Stoney Project, in Buckinghamshire and; the 100MW Lakeside Project, in North Yorkshire. This year, RES has also successfully completed the development, construction and handover of Gorey, a 9MW project in ROI, and Gorman, a 50MW project also in ROI, using Narada batteries and Power Electronic inverters.

2 The Proposal

2.1 Site Description

The site is located in a field currently used as a commercial 'Christmas Tree' field (Noble Fir plantation) and covers an area of approximately 2.19ha. It is located to the east of Ayr and is directly to the west of the existing Ayr Electrical Substation where the system will connect. To the south of the site is Dobbies Garden Centre and the A70 further beyond that. The River Ayr is located approximately 170m north of the site, separated from the site by dense vegetation. The site boundary also extends out to the A77 to the east where an existing entrance will serve as the access to the site. A location plan can be found in drawing 04874-RES-MAP-DR-XX-001.

The site itself rises gently toward the east, flattening out toward the centre of the site.

The site is easily accessible from the A77 which runs parallel along the western border of the field within which the site is located. The existing gated access off the A77 to the site, which is frequently used for the active commercial Christmas Tree business, forms the site entrance.

2.2 Development Description

The proposed development comprises the installation of an energy storage facility, including battery enclosures, power conversion units, transformers, substations, grid connection infrastructure, vehicular access and associated works.

The proposed system utilises proven lithium-ion battery technology which RES has deployed at multiple projects at locations including England, Scotland, Ireland, the USA and Canada.

2.2.1 Amount, Scale and Appearance

Battery Enclosures

Approximately 36 battery storage enclosures would be installed to provide approximately 49.9MW of capacity. The battery enclosures will be one of two types depending on the final choice of supplier, both of which are shown in drawing 04874-RES-BAT-DR-PT-001. The first type are simply modified ISO-style shipping containers set on concrete foundations, with typical dimensions of 13.7m long, 2.4m wide and 2.9m high. Heating Ventilation & Air Conditioning (HVAC) units are located at each end of each container. The enclosures are generally finished in a shade of white or grey.

The second type are modular battery enclosures, also set on concrete foundations, which are 'packed' together to form similar dimensions to that of the enclosure mentioned above. These modular battery storage enclosures have a white finish.

Power Conversation Systems and Transformers

Approximately 18 PCSs and transformers would be required with typical dimensions of 10.3m long, 6m wide and 2.5m high (see drawing 04874-RES-PCS-DR-PT-001). They would also be set on concrete block foundations and would be finished in a shade of white or grey.

Substations

Two containerised substation units would be required. Located adjacent to each other, these would measure a maximum of 17.5m long in total, 5m wide and 4.5m high (see drawing 04874-RES-SUB-DR-PT-004). The units would be set on a concrete foundation and finished in a shade of grey or green.

Auxiliary Transformer

An auxiliary transformer with typical dimensions of 1.9m long, 1.9m wide and 2.1m high would be installed adjacent to the energy storage enclosures (see drawing 04874-RES-SUB-DR-PT-001). This would be set on concrete foundations and would be finished in a shade of grey or green.

Grid Compliance Equipment

It is expected that two grid compliance equipment units will be required. They will measure up to approximately 4m long, 2.8m wide and 2.7m high (see drawing 04874-RES-SUB-DR-PT-002) and be finished in a shade of grey or green. They will each be set on a concrete foundation up to approximately 4.3m long and 3.1m wide.

Spares Container

One additional ISO-style shipping container will be located adjacent to the battery enclosures with typical dimensions of 13.7m long, 2.4m wide and 2.9m high. It would be finished in a shade of white, grey or green.

Security

Security fencing will be installed around all four edges of the energy storage compound. Following acoustic analysis of the proposed system, this fencing will be closed board wooden acoustic fencing up to 3m in height (see drawing 04874-RES-SEC-DR-PT-002). Should alternative acoustic mitigation measures be identified during detailed design, a typical palisade or mesh security fence may be utilised (see drawing 04874-RES-SEC-DR-PT-001).

Stands for CCTV cameras will be installed on site. The CCTV cameras are mounted on galvanised steel posts (or similar) measuring up to approximately 4m high and set in concrete foundations. The cameras may have pan, tilt and zoom functions. They will be located adjacent to the fencing around the edge of the energy storage compound (see drawing 04874-RES-SEC-DR-PT-003).

The only lighting within the proposed development would be PIR ‘infrared’ lighting associated with the CCTV system, which would not be visible to the naked eye, together with PIR operated external lights mounted above doorways. The proposed development does not incorporate any visible, permanent artificial lighting.

Grid Connection

Cabling will connect all equipment within the energy storage compound to the on-site customer substation. An additional run of underground cable(s) will then connect the on-site customer substation to the existing Ayr electrical substation located toward the west of the site. This latter run of cable does not form part of this planning application.

Drainage

A Sustainable Drainage System (SUDS) will be utilised to manage on-site surface water run-off. The proposed water attenuation pond, located to the southwest of the energy storage compound, and associated drainage route are shown on the infrastructure layout drawing (04874-RES-LAY-DR-PT-001). Further details are provided in Section 5.5 of this document and in the supporting Flood Risk Screening and Surface Water Management Plan.

2.2.2 Layout

The proposed layout of the site is shown in the Infrastructure Layout Plan (04874-RES-LAY-DR-PT-001). The layout has been guided by a number of factors, but primarily by the operational requirements of an energy storage facility combined with site constraints.

The battery storage enclosures and associated PCS and transformer units have been sited in close parallel rows to reduce the amount of cabling required between each unit and to condense the area required for the overall development. Space between the equipment on site and surrounding fence has also been left in order to provide sufficient space for a crane during construction and in case of repair and augmentation.

The attenuation basin has been located to the southwest of the site, at the lowest point, in order to utilise the existing topography of the land to assist with drainage of the site.

2.2.3 Access

Access to the site would be via the existing track which runs through the middle of the field. This track will connect the energy storage compound to the A77 toward the northwest and will be upgraded as part of the initial works to an unbound granular track. Access onto the A77 will utilise the existing gated entrance which is currently used by vehicles accessing the commercial Christmas Tree field.

It should be noted that at the time of the Proposal of Application Notice (PAN) submission, two potential access points to the site were being considered; the current proposed route from the A77 and an alternative route which links the site to the A70 via the existing substation access road. Following detailed investigation, the route from the A70 has been deemed unfeasible due to safety concerns surrounding visibility at the junction between the substation access road and the A70, as well as the presence of several live, high voltage cables along the substation access road and within the bank which would need to be battered down to connect to the proposed site. Access from the A77 has therefore been taken forward as the preferred option in this full planning application as it will remove significant safety risks as well as making use of an existing track that connects to the site, therefore minimising the development's impact.

It is also noted that the internal access track will cross two high pressure gas pipelines which run through Holmston Farm and are owned by Scottish Gas Networks (SGN). RES have opened discussions with SGN to design a solution to safeguard the integrity of their pipelines; it is expected that an AC Interference Investigation will be carried out following SGN's initial review of this planning application to inform the final design of this solution.

2.2.4 Landscaping

A landscaping plan has been submitted (see 'Landscape Masterplan') which takes account of the identified areas of sensitivity by providing additional planting where required and maintenance notes for the proposed planting. During construction, the existing mature woodland immediately north-east of the site, the mature

trees and hedgerow species to the east and south and the tree line which forms the western boundary of the wider field would be retained and protected in accordance with BS 5837:2012.

The landscaping proposals include the following:

- Creation of new native tree and scrub planting on earth bunds to the west of the compound to provide visual enclosure to the development, particularly from residential properties at Holmston and Masonhill.
- Provision of new native tree and shrub infill planting along the southern boundary.
- Enhancement of other areas surrounding the compound and access track through proposed seed mixes.
- Ongoing landscape management of planting during the lifetime of the proposed development.

2.3 Site Selection Process

Energy storage projects require certain conditions in order to be feasible. The requirements are listed here as well as a short explanation of how they shaped the selection and design of this site.

Viable grid connection: An energy storage facility needs to be able to both import and export energy to the grid network. Due to the issues facing the grid network (discussed in Section 2.4 below), the availability of sites where the required amount of import and export capacity is available is diminishing.

The existing electrical substation at Ayr has a viable amount of both import and export capacity available which RES has secured for this project. Identifying a substation which can provide a viable grid connection was the first step to selecting this site.

Proximity to substation: Energy storage facilities need to be located as close as possible to the substation from which its grid connection is provided in order to limit electrical losses and ensure greater efficiency of the system. The distance between potential energy storage sites and the nearest suitable grid connection is often a major barrier to the deployment of renewable and low carbon energy due to the high costs involved. The longer the distance, the higher the cost and the larger the environmental impacts, rendering many projects unviable.

Identifying land as close as possible to the existing Ayr electrical substation was therefore the second step in selecting this particular site. This is a key factor in the choice of location for the proposed development.

Availability of land: An energy storage facility of this capacity requires an area of land of at least approximately 5 acres to accommodate the batteries and supporting electrical infrastructure. Land of this size, as close to the substation as possible, which is free from other development and obtainable from a third-party landowner is required. Additional space for drainage, landscaping and access is also required.

Land around the Ayr substation was therefore assessed with regard to its size and availability. The selected site provides ample space for a storage development of this size and is free from any other forms of current or future development. Alternative site locations to the south of the substation, and toward the west of the proposed site were excluded due to their unavailability for development; land to the south of the substation is currently being considered by South Ayrshire Council for a residential and commercial development (planning reference: 22/00302/PPPM), whilst land toward the west of the proposed site and the A77 is

dominated by existing residential development with no space available for an energy storage project. Consequently, alternative sites in these locations were unavailable and therefore excluded.

Environmental and policy constraints: Energy storage facilities, where possible, should avoid being sited on land which are designated for landscape, heritage, ecological or other environmental reasons, or on land where development is restricted by local planning policy.

This particular site has been chosen as it is not located within any statutory designated areas for landscape, heritage or ecology. Whilst the site is located with an area of South Ayrshire's green belt, this has been necessitated due to the earlier steps in this site selection process and the proximity of Ayr electrical substation. Nevertheless, care has been taken to ensure that the system is designed sensitively to ensure that any effects upon the green belt are reduced as far as practicable, including locating the site itself at the very edge of this green belt area and designing a significant landscaping scheme to reduce any potential visual impact of the proposal.

Alternative locations to the north of Ayr substation were explored but were considered unsuitable due to environmental and policy constraints; land to the north of the substation is also located within the green belt as well as within the Ayr Valley Local Landscape Area, a heavily wooded valley popular and well-used as a recreational resource and with some level of wildlife importance. A location to the north of the substation would also involve a installing a cable connection across the River Ayr which would introduce potential environmental impacts which are difficult to mitigate. Alternative sites to the north of the substation were therefore excluded from further investigation.

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

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

An alternative location to the east of Ayr substation was considered but later ruled out due to several constraints, such as numerous overhead electricity cables crossing the site and limiting any area available for development. It should also be noted that this location toward the east was unavailable from a 3rd party landowner and would also have been located deeper within the green belt, potentially having a greater impact upon the purpose of the green belt.

Conclusion:

This specific site has therefore undergone rigorous assessment to ensure that it is suitable to accommodate the development of an energy storage facility. Given the unique locational advantage of the site, directly adjacent to an existing electrical substation with a rare available grid connection, and lack of sensitive receptors in the immediate vicinity, the site is therefore considered particularly suitable for this type of development. Alternative sites surrounding the connection point at Ayr substation were considered but later

excluded due to a lack of available land, environmental designations and physical site constraints. The proposed site is therefore the only possible location for the proposed development.

2.4 Need for the Development

There is now an undisputed need for additional renewable and low carbon energy infrastructure, including energy storage, in order to meet the challenge of climate change. In June 2019 the UK became the first major economy in the world to legislate a binding target to reach net zero emissions by 2050, whilst Scotland's Climate Change (Emissions Reduction Targets) (Scotland) Act 2019 went even further, targeting a date of 2045 to reach net zero, with interim targets for reductions of at least 75% by 2030; one of the world's most ambitious targets.

To reach these ambitious, legally binding targets, the increased development and deployment of renewable energy technologies such as wind and solar are required. However, these renewable energy technologies generate electricity intermittently depending on weather conditions, which ultimately causes imbalances in the electricity network; at any one time, the amount of energy being generated needs to be balanced with the amount of energy being used. If this balance is not achieved, the function of the grid network is compromised, and the possibility of power outages is high. The more renewable energy generation is added to the grid network, the harder this balancing act becomes.

Energy storage therefore provides this vital balancing role to ensure that the grid remains stable at times of stress; this proposal is therefore for a battery energy storage system which is able to store energy at times when generation exceeds demand and then release electricity back to the national grid network when demand exceeds generation. Electricity is not physically generated on site. Given the high penetration of wind energy in Scotland, flexibility and stability services provided by energy storage systems are urgently required to safely manage the grid network in the region.

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

3 Screening & Pre-Application Consultation

Prior to the submission of this application, a formal pre-application enquiry to South Ayrshire Council, including an EIA Screening Request, was submitted by RES. A pre-application response was received on 8th November 2022 (ref: 22/00437/PREAPP). The response provided comments on the proposal from a handful of consultees and highlighted a number of key points and relevant local development plan policies to consider in further detail before progressing to a full planning application.

A Screening Response was then issued by South Ayrshire Council on the 14th November 2022 (ref: 22/00789/EIASCR), which confirmed that, when screened against the selection criteria outlined in Schedule 3 of the *Town and Country Planning (Environmental Impact Assessment) (Scotland) Regulations 2017*, (including cumulative impact, pollution, impact on natural resources/the natural environment, environmental quality and the historic environment), the potential impact on the receiving environment was considered not to be significant. Consequently, the proposed development does not constitute 'EIA development' and an Environmental Impact Assessment (EIA) has not been required.

Following this, RES has discussed the proposal in further detail with relevant consultees in order to clarify any points raised within the pre-application response and to ensure that all points have been fully addressed in this full planning application.

4 Planning Policy Appraisal

4.1 Introduction

Section 25 of the Town and Country Planning (Scotland) Act 1997 as amended by The Planning etc. (Scotland) Act 2006 and, more recently, the Planning (Scotland) Act 2019, states that:

> *'Where, in making any determination under the planning Acts, regard is to be had to the development plan, the determination is, unless material considerations indicate otherwise to be made in accordance with that plan'.*

Section 37(2) of the Act states:

> *'In dealing with such an application the authority shall have regard to the provisions of the proposed development plan, so far as material to the application, and to any other material considerations'*

For this proposed Holmston Farm Energy Storage Facility, the development plan comprises the South Ayrshire Local Development Plan (LDP2) 2022. Relevant policies within the Plan are assessed below and a summary of relevant material considerations are provided.

4.2 South Ayrshire Local Development Plan (LDP2) 2022

The South Ayrshire Local Development Plan (LDP2) is the statutory development plan and the starting point for determining applications as set out in the Town and Country Planning (Scotland) Act 1997 Section 25. The LDP2 was adopted in August 2022, replacing the LDP1 which was adopted in 2014, and sets out the development strategy, key policies and proposals that provide the land use planning framework to guide development in South Ayrshire up to 2032.

4.2.1 Relevant Policies

Specific policies within the LDP2 which are relevant to this proposal are analysed in turn below and an explanation as to how this proposed development complies with each policy is provided.

Strategic Policy 1 – Sustainable Development

This policy states that South Ayrshire council will support the principles of sustainable development by ensuring that all development contributes to an efficient use of, or provision for, public services, facilities and infrastructure. The proposed development will provide balancing services to the National Grid Electricity Network that will help to encourage and accelerate the roll out of renewable energy sources which is critical to achieving national and local decarbonisation targets. More discussion on the wider need for the proposed development can be found in section 2.4 of this Planning Statement as well as the material considerations in section 4.3. Therefore, the proposed development is in line with Strategic Policy 1.

The development is also compliant with Strategic Policy 1 as it:

- Does not have a negative effect on air or water quality.
- It incorporates a sustainable urban drainage system and avoids increasing risks of all forms of flooding.

- It respects the character of the landscape by incorporating a significant landscaping proposal to ensure that visual impacts are minimal.
- Helps mitigate and adapt to the effects of climate change.
- Is in an accessible location.

The proposed development is therefore considered to be compliant with Strategic Policy 1.

Strategic Policy 2 – Development Management

This strategic policy sets out detailed criteria to ensure that proposals promote and facilitate the ability of LDP2 to deliver and achieve its aim to *"make the most of sustainable economic growth that is supported by sound social and environmental objectives"*.

The proposed development is in accordance with this policy due to the following:

- It is appropriate in terms of layout, scale, massing, design and materials in relation to its surroundings given that the site is located in close proximity to an existing electrical substation. It has been sized and designed specifically to ensure that the available grid connection capacity at Ayr substation is fully utilised whilst also ensuring that the design remains 'compact', with equipment located in compact rows so that all infrastructure can be 'nestled' behind existing development and vegetation, therefore ensuring that views of the proposal are limited.
- It is not located in an area designated for a specific land use or committed development proposal.
- It utilises an existing site access and is supported by a full Transport Statement and CEMP which will ensure a safe entry and exit from the development. It is also designed to accommodate the required parking provision and turning area within the site itself to avoid access routes being blocked and parking on main highways.
- It includes security measures such as security fencing and CCTV in order to discourage crime.
- It is not located within a Health and Safety Executive safeguarding zone.
- It is located directly adjacent to the existing Ayr substation (the point at which it will connect to the grid network), demonstrating a clear locational need and reducing further impacts from extensive cabling.
- It includes the planting of native trees and scrub, woodland creation, as well as good quality grassland areas, which will not only significantly reduce the visual impact of the development but will importantly help to enhance the surrounding environment through the creation of new habitat and promotion of biodiversity, resulting in a net gain for biodiversity of 15.52%.
- It will not result in the loss of an area of maintained amenity or recreational open space; it is located on private land.

The site of the proposed development has been chosen because of its proximity to an available grid connection at Ayr substation which is essential to delivering new electrical energy infrastructure, and the site's low environmental sensitivity. Detailed surveys regarding landscape, ecology, heritage, noise and transport have been completed and are summarised in Section 5 of this document. They conclude that the proposal will have no significant adverse impacts upon the surrounding environment. Where moderate impacts have been identified, mitigation has been proposed to ensure that they do not become adverse.

The benefits of energy storage and how it contributes to renewable energy targets have been discussed in section 2.4 of this document and addressed further in the examination of material considerations discussed

below in section 4.3. The proposed development's contribution to renewable energy generation targets and its effect on greenhouse gas emissions is substantial; energy storage facilities are urgently required to ensure a safe and secure electricity system.

The development therefore promotes and facilitates the ability of LDP2 to deliver and achieve its aim to *"make the most of sustainable economic growth that is supported by sound social and environmental objectives"* and is fully in accordance with Strategic Policy 2.

LDP policy: delivering infrastructure

The LDP2's 'delivering infrastructure' policy requires all new development proposals to include all on site infrastructure which is directly related to the proposal and that measures to ensure the provision of any off-site infrastructure which is necessary to accommodate the development and make it acceptable within planning terms. As with renewable energy developments, there must be consideration for off-site (transportation) infrastructure and a contribution to open space and green networks.

The on-site infrastructure required for this proposal has been outlined in section 2.2 above and will be fully accommodated within the proposal site. Transport provisions for the proposal have been presented in detail in the supporting Transport Statement. Access will be taken from the A77 where an existing entrance to the site, which is currently used for the commercial Christmas Tree business, will be utilised. Measures to ensure safe entry and exit from the site have been detailed in the supporting Construction and Environmental Management Plan (CEMP). Once operational, the site will be accessed periodically and therefore no impacts are expected on the transportation network.

A detailed Landscape Masterplan has also been submitted in support of this application to demonstrate a contribution to green networks and enhance biodiversity within the area. A net gain for biodiversity of 15.52% will be achieved on site.

The proposed development is therefore in accordance with the LDP2's 'delivering infrastructure' policy.

LDP policy: greenbelt

The LDP2's 'greenbelt' policy states that the Council will only support development within the green belt if it is of a high design quality, a suitable scale and form, and meets the following criteria:

- *Contributes to the economic and environmental sustainability of existing green belt uses.*
- *Is associated with agriculture, including the reuse of historic buildings.*
- *Has horticultural (or directly related) uses.*
- *Is a recreational use that needs a green belt setting.*
- *Is required at the proposed location to provide essential infrastructure.*

Development in the green belt should protect, promote and help to develop green networks and opportunities for access to the countryside. If a development would not normally be consistent with green belt policy, the Council may still consider it to be appropriate either as a national priority or to meet an established need and no other suitable site is available. It should also be remembered that green belt is a land use designation rather than one which indicates a valued landscape.

In terms of potential development types within the South Ayrshire Green Belt, the proposed development complies with the following point stated within this policy:

> *'Is required at the proposed location to provide essential infrastructure;'*

As discussed in Section 2.3, the proposed development has been strategically located adjacent to Ayr substation as it is the location at which the project connects to the national grid network, and this is essential for the safe and efficient operation of the system. By locating the system as close as possible to the point at which it connects, the connecting infrastructure has also been minimised, preventing further visual and environmental impacts; unlike the pylon lines within the green belt associated with the substation which are seen against the skyline, the components of the proposed development would be relatively low, and largely screened by the existing and proposed mitigation measures.

It should also be noted that the existing site does not provide any promoted access to open space or access to the countryside. The existing mature woodland to the north and the mature trees and vegetation to the east and south would be retained. The proposed landscaping would also provide visual enclosure and will provide some additional biodiversity opportunities, amounting to a significant net gain of 15.52%.

The supporting Landscape and Visual Assessment (LVA) concludes that the visual amenity within the eastern area of the South Ayrshire green belt would not be materially adversely affected by the proposed development as it would be largely contained from wider views by the existing mature vegetation along the majority of the site boundaries, mitigation measures and intervening vegetation and landform within the wider landscape. The proposed development would not interact with the skyline nor interrupt the views gained from higher elevations south-west of the site outside the Green Belt at Masonhill.

A further assessment of the potential visual effects of the development on the green belt and its openness can be found in Appendix 2 of the supporting LVA.

Given the significant locational requirement of the proposal, the established national need, and the likely limited, localised nature of effects resulting from the proposal, the proposed development is therefore in accordance with LDP2's 'greenbelt' policy

LDP policy: landscape quality

The LDP2's 'landscape quality' policy seeks to maintain and improve the quality of South Ayrshire's landscape. Development proposals must conserve features that contribute to local distinctiveness, including community settings; patterns of woodland, fields, hedgerow and tree features; special qualities of rivers, estuaries and coasts; historical and cultural landscape; geodiversity of the area and; skylines, hill features and prominent views.

The proposed development would be located on a site which has not been identified for its local distinctiveness. The site is largely contained by robust vegetated boundaries along the northern, eastern, south-eastern and western perimeters of the wider field. A detailed Landscape Masterplan has been submitted in support of this application which proposes additional tree and shrub planting along the western border of the site to enhance the existing features and ensure that any landscape impacts from the development are minimal.

This policy also seeks to protect the eleven Local Landscape Areas (LLA) designated within South Ayrshire from harmful impacts. The proposed development site is located directly southwest of LLA J The Ayr Valley, however, the supporting Landscape and Visual Assessment (LVA) concludes that there would be very limited visibility of the development from the LLA. The proposed development would be visible from the edge of the woodland within the LLA directly north-east of the site. However, there are no promoted routes which would provide access to this woodland edge. Beyond the woodland edge actual views of the proposed development from within the LLA would be fully screened by the mature trees and vegetation along the River Ayr and either side of the A77. Any effects on this designation would therefore be minor at proximity to the proposed development, with no effects across the wider designation.

The proposed development is therefore in accordance with LDP2's 'landscape quality' policy.

LDP policy: preserving trees

The LDP2's 'preserving trees' policy states:

> *'When assessing proposals for development that might involve loss of, or work to trees, we will consider how much it would affect the local area and will take measures to protect trees, especially those covered by a provisional or confirmed Tree Preservation Order.*
>
> *Ancient and veteran trees of high nature conservation and landscape value will be protected. The planning authority will work with developers to agree a defined root protection area for all retained trees likely to be adversely affected by development. All such root protection areas will be safeguarded by condition throughout the course of development.'*

There are no Tree Preservation Orders within or close to the site. The woodland directly north and existing tree lines on the perimeter of the site would be protected during construction and retained in accordance with BS 5837:2012.

The proposed development is therefore in accordance with LDP2's 'protecting trees' policy.

LDP policy: flood and development

The primary principles of the LDP2's 'flood and development' policy are to manage flooding properly, reducing its effects and avoiding the allocation of land for development on flood risk areas. A full Flood Risk Screening and Surface Water Management Plan has been completed in support of this application and it concludes that that the proposed development is not at risk of flooding from any of the sources assessed and will not increase the probability of flooding elsewhere.

The policy also requires that development proposals must include Sustainable Urban Drainage Systems (SUDS) which have been designed in line with the SUDS Manual (CIRIA C753). SUDS should be designed to maximise the opportunities for habitat restoration and biodiversity and be considered as an integral element of wider visual and landscape design. Consequently, the proposal incorporates an above ground attenuation pond solution, designed to accommodate the 'worst case' to ensure that the 1 in 200-year event + a 40% climate change allowance can be accommodated. The attenuation pond will also be vegetated in order to increase the infiltration of flows but also to increase its contribution to biodiversity gains.

Overall, the proposed development would neither be at unacceptable risk of flooding, nor increase flood risk on or surrounding the site, and includes a suitable SUDS design, therefore it is considered in accordance with this policy.

LDP policy: water environment

The LDP2's 'water environment' policy aims to protect and maintain the quality of the water environment, including surface, coastal and groundwaters.

The proposal is located over 150m from the River Ayr therefore a sufficient buffer strip has been maintained between the development and the water environment.

The final discharge point for the restricted flow from the proposed attenuation pond will be to the River Ayr to the north of the site, therefore matching the existing hydrological pathways. Surface water will receive a minimum of three stages of treatment before being discharged via existing pathways to the River Ayr in order to remove any contaminants. Furthermore, during the construction phase, temporary silts fences will be installed, providing an additional treatment stage of water filtration. There will be no permanent foul drainage from the proposed development.

The proposed development will therefore not pose an unacceptable risk to the quality of the water environment and is therefore in accordance with this policy.

LDP policy: air, noise and light pollution

The LDP2's 'air, noise and light pollution' policy states that the Council will not allow development which would expose people to unacceptable levels of air, noise and light pollution.

With regard to air quality, once operational, the proposed development will create very limited vehicle movements, generally one every month for maintenance purposes. Furthermore, the infrastructure itself will not release any emissions to the air, therefore the development will not lead to an adverse impact upon air quality. Potential impacts upon air quality during the construction phase have been assessed in the supporting Construction Environmental Management Plan (CEMP) which includes information on construction traffic movements and dust mitigation measures, all of which indicate that no unacceptable impacts will occur.

The proposal has been specifically located a sufficient distance away from residential properties to ensure that it will not create an unacceptable impact upon the health and living conditions of nearby residents. This is supported by the submitted Acoustic Assessment which also demonstrates that no unacceptable levels of noise or vibration will occur because of this proposal.

The only lighting within the proposed development would be 'infrared' lighting associated with the CCTV system and PIR operated security lighting above doors. The proposed development does not incorporate any permanent, visible artificial lighting.

The proposal will therefore not result in any unacceptable levels of air, noise or light pollution and as such is in full accordance with this policy.

LDP policy: renewable energy

The LDP2's 'renewable energy' policy acknowledges that electricity generated from renewable sources is a vital part of the response to climate change. The policy deals with forms of renewable energy other than

wind energy and aims to reduce any potential harmful effects on the natural or built environment from such developments. It states:

> *'We will support proposals for generating and using renewable energy in stand-alone locations, and as part of new and existing developments, if they will not have a significant harmful effect on residential amenity, the appearance of the area and its landscape character, biodiversity, historic environment and cultural heritage associations.'*

The site of the proposed development has been chosen because of its low environmental sensitivity and its proximity to an available grid connection which is essential to delivering new electrical energy infrastructure. The proposed development would be located within an area already influenced by Ayr substation and associated infrastructure and would be directly connected to this infrastructure. Detailed surveys regarding landscape, ecology, heritage, noise and transport have been completed and are summarised in Section 5 of this document. They conclude that the proposal will have no significant adverse impacts upon the surrounding natural or built environment. Where moderate impacts have been identified, mitigation has been proposed to ensure that they do not become adverse.

The proposed development is therefore fully in accordance with LDP2's 'renewable energy' policy.

LDP policy: historic environment

The LDP2's 'historic environment' policy states that South Ayrshire Council will protect, preserve and, where appropriate, conserve and/or enhance the County's historic environment. This includes heritage asset types including listed buildings, conservation areas, scheduled monuments, gardens and designed landscapes, and non-designated historic environment assets.

A full Historic Environment Assessment has been completed and submitted in support of this application. The assessment concludes that the site has limited archaeological potential and will not impact upon any designated heritage assets or their setting.

The proposed development is therefore in accordance with LDP2's 'historic environment' policy.

LDP policy: natural heritage

The LDP2's 'natural heritage' policy aims to protect the natural heritage found within South Ayrshire and conserve international, national and local designations and protected sites and species.

The proposed development is supported by a Preliminary Ecological Appraisal (PEA) which is summarised in Section 5.2. The appraisal confirms that adverse impacts on international, national or local designations due to the proposed development are not expected.

Whilst the site walkover did not identify signs of protected species, the PEA notes that that the site and its surroundings provide suitable habitat which may support badgers, otter, invertebrates, bats and nesting birds. Appropriate mitigation measures and pre-construction surveys are proposed which will provide an updated baseline of the site and establish the presence of any of these protected species. On completion of the pre-construction surveys, suitable avoidance and mitigation measures will be prescribed that are in tune with the works programme and detailed design so that the proposed development does not adversely affect these protected species.

Whilst the policy concentrates on protecting South Ayrshire's natural heritage assets, it should be noted that RES are committed to enhancing biodiversity at and around energy storage projects. Measures to enhance biodiversity have therefore been built into the design and layout of this proposal from the outset and can be seen in the supporting '*Landscape Masterplan*'. A Biodiversity Net Gain Assessment has also been completed which concludes that the proposal provides a net gain for biodiversity of 15.52% which will enhance South Ayrshire's natural heritage.

Consequently, with the proposed mitigation and further surveys, the proposed development will not conflict with the LDP2's 'natural heritage' policy.

4.3 Material Considerations

4.3.1 National Planning Framework 4 (NPF4)

The National Planning Framework 4 (NPF4) was approved by Scottish Parliament on 11th January 2023 and was adopted and published by Scottish Ministers on the 13th February 2023, superseding the NPF3. The NPF4 sets the context for development planning in Scotland and is a framework for the spatial development of Scotland as a whole.

NPF4 confirms the necessary and urgent action required to achieve net zero-emissions by 2045; a new policy on '*Tackling the Climate and Nature Crises*', has formed the foundations for the spatial strategy as a whole and underpins all other policies in the NPF4, acknowledging that we are within a critical decade for emissions reduction progress. It is now clear through the weighting to be applied to different policies, that the climate and nature crises are the priority. Specifically, Policy 1 of the NPF4 states:

> *'When considering all development proposals significant weight will be given to the global climate and nature crises.'*

There is a clear expectation on the role that planning must play in delivering the expansion of renewable energy needed to realise the transition from a reliance on fossil fuels. NPF4 reflects the need to get behind the delivery of renewable energy to achieve net zero targets. Contrary to previous frameworks, NPF4 explicitly recognises the role that energy storage facilities play in facilitating the generation of renewable energy, with Policy 11 stating:

> *'Policy Intent: To encourage, promote and facilitate all forms of renewable energy development onshore and offshore. This includes energy generation, storage, new and replacement transmission and distribution infrastructure and emerging low-carbon and zero emissions technologies including hydrogen and carbon capture utilisation and storage (CCUS).'*

It goes on to state that all forms of renewable, low-carbon and zero emissions technology will be supported, explicitly listing battery storage.

Furthermore, the NPF4 recognises the nature crisis, with Policy 3 requiring development to provide significant biodiversity enhancements through careful design and planning. The proposed development will provide a 15.52% net gain for biodiversity through the introduction of new native planting on site, good quality grassland creation and the introduction of bird, bat and insect boxes, and is therefore in accordance with this policy.

Policy 8 of the NPF4 addresses development in the green belt. A detailed assessment of this policy, and other policies surrounding development in the green belt, can be found in section 4.4 below. It is summarised that the proposed development does not conflict with the aims and intent of this policy 8.

Given that the proposed development constitutes battery energy storage to support the generation of energy from renewable sources, reduce reliance on fossil fuels and ensure that the UK is more resilient to the impacts of climate change, it clearly accords with the aims of the Scottish Government and is supported by the overarching ambition of the NPF4, particularly when significant weight is given to the global climate crisis as required by Policy 1.

4.3.2 Scottish Planning Policy (SPP) 2014

The purpose of the Scottish Planning Policy (SPP), published in June 2014, is to set out national planning policies which reflect Scottish Ministers' priorities for operation of the planning system and for the development and use of land. It promotes consistency in the application of policy across Scotland whilst allowing sufficient flexibility to reflect local circumstances.

The SPP contains four planning outcomes which explain how planning should support the vision for Scotland to become a sustainable economy and a low carbon place. The second of the four outcomes is as follows:

> ***Outcome 2: A low carbon place*** *– reducing our carbon emissions and adapting to climate change.*

Outcome 2 goes on to state:

> *By seizing opportunities to encourage mitigation and adaptation measures, planning can support the transformational change required to meet emission reduction targets and influence climate change.*

Given that the proposed development presents an opportunity help accelerate the roll out of a low carbon electricity system and therefore support in meeting emission reduction targets, it is considered that this proposal is strongly aligned with the SPP.

Furthermore, paragraph 154 of the SPP states that the planning system should:

> *'Support the transformational change to a low carbon economy, consistent with national objectives and targets.*
>
> *Support the development of a diverse range of electricity generation from renewable energy technologies – including the expansion of renewable energy generation capacity – and the development of heat networks.'*

Whilst the SPP clearly encourages the planning system to support proposals such as this, it does also highlight that safeguarding and enhancing the natural and built environments is a key role of the planning system. This proposal is a well-designed development which has not been found to cause significant adverse impacts to the surrounding natural and built environment. It has a clear locational need to be sited as close as possible to a connection point to the national grid network and will assist in the roll out of renewable energy generation across Scotland. As paragraph 168 the SPP states:

Energy storage schemes help to support development of renewable energy and maintain stability of the electricity network in areas where reinforcement is needed to manage congestion.

The SPP therefore demonstrates significant support for the proposed development.

4.3.3 South Ayrshire Council's Sustainable Development and Climate Change Strategy

In June 2019, South Ayrshire Council approved its first Sustainable Development and Climate Change Strategy with the aim of putting South Ayrshire Council in the forefront of Scotland's push towards a more sustainable future.

Although the strategy largely focuses on reducing the Council's own emissions from its buildings, transport, procurement and waste processes, it importantly acknowledges that the need to address climate change should be a guiding principle in all council strategies and plans, and that supporting renewable energy generation can help to reduce the area's carbon footprint. Its overall goal is:

'People in South Ayrshire enjoy a good quality of life now and in the future - with a thriving economy, just society and healthy environment - while working to reduce greenhouse gas emissions to avoid the worst effects of climate change and build resilience to adapt to its impacts.'

One intended outcome of the strategy is that South Ayrshire's environment is protected, enhanced and respected through protecting and enhancing biodiversity and using the natural environment to adapt and mitigate the impacts of climate change. Given that this proposal will create new habitats and therefore enhance biodiversity on site, it is considered to be supported by this strategy. Consequently, this Climate Change Strategy and South Ayrshire's increasing focus on the climate agenda should be afforded due weight in the planning balance.

4.3.4 Scottish Energy Strategy: The Future of Energy in Scotland

Published in 2017, Scotland's first energy strategy sets out the Scottish Government's vision for the future energy system in Scotland through to 2050. The strategy aims to deliver a well-balanced system capable of providing secure and affordable energy to meet Scotland's needs. One of the strategy's six priorities is:

*'**System security and flexibility** - Scotland should have the capacity, the connections, the flexibility and resilience necessary to maintain secure and reliable supplies of energy to all of our homes and businesses as our energy transition takes place.'*

The strategy acknowledges that Scotland's future energy mix needs to be far more flexible than in the past, and recognises the role of newer, emerging technologies, stating:

'Renewables will play a huge part in meeting our future energy needs. But there will be roles too for other sources and technologies - for thermal generation with carbon capture, for pumped storage hydro and other forms of storage, and for smarter, more interconnected networks.'

As discussed in Section 2.4 of this document, the proposed energy storage facility will provide a vital balancing role to ensure that the grid network remains stable at times of stress and balances the peaks and troughs of weather dependant renewable energy sources; this is imperative to the successful transition

towards carbon net-zero objectives and a successful energy system for Scotland. The proposed development is therefore thoroughly in line with the Scottish Energy Strategy.

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

In direct response to the international Paris Agreement, the Climate Change (Scotland) Act 2009 was amended by the Climate Change (Emissions Reduction Targets) (Scotland) Act 2019, increasing the ambition of Scotland's emissions reduction targets to net zero by 2045, which is ahead of many other countries, including the UK. There is also an interim target of a 75% reduction in emissions by 2030.

The Climate Change (Scotland) Act 2009 had already established Scotland as a leader in tackling climate change, but the updated Act further asserts the Scottish Government's commitment to being at the forefront of global change.

Projects such as this proposal play a key role in aiding the decarbonisation of the energy sector by supporting the increased roll out of renewable energy generation and therefore being a key asset in the delivery of these ambitious targets. There is a clear need to consent proposals such as this if Scotland's targets are to be met.

4.3.6 Update to the Climate Change Plan: 2018-2032

Published in December 2020, this document provides an update to the Climate Change Plan, originally published in 2018, to reflect the increased ambition of the new targets set in the Climate Change (Emissions Reduction Targets) (Scotland) Act 2019. The plan sets out Scotland's approach to delivering a green recovery and a pathway to achieving world leading climate change targets as it emerges from COVID-19.

With regard to electricity, the Update to the Climate Change Plan lists a series of policies in order to meet three outcomes:

> *'**Outcome 1**: The electricity system will be powered by a high penetration of renewables, aided by a range of flexible and responsive technologies.*
>
> ***Outcome 2**: Scotland's electricity supply is secure and flexible, with a system robust against fluctuations and interruptions to supply*
>
> ***Outcome 3**: Scotland secures maximum economic benefit from the continued investment and growth in electricity generation capacity and support for the new and innovative technologies which will deliver our decarbonisation goals.'*

In line with the 2018 plan, the focus is on the period up to 2032. By this time, the strategy sees Scotland's electricity system having 100% of electricity demand being met from renewable sources and sees it moving from a low to a zero-carbon electricity system. To do this, the strategy focuses on a substantial and sustained increase in renewable generation, expecting to see the development of between 11 and 16GW of capacity during this period, particularly through an increase in offshore and onshore wind development. As discussed in Section 2.4 of this document and recognised by the Update to the Climate Change Plan, ensuring that the infrastructure is in place to balance out the peaks and troughs of energy generation from these weather dependent sources should be a priority and projects such as this proposal afforded significant support.

Supporting policies include, but are not limited to:

- *'Support the development of technologies which can deliver sustainable security of supply to the electricity sector in Scotland and ensure that Scottish generators and flexibility providers can access revenue streams to support investments.*
- *Introduce a new framework of support for energy technology innovation, delivering a step change in emerging technologies funding to support the innovation and commercialisation of renewable energy generation, storage and supply.*
- *Support improvements to electricity generation and network asset management, including network charging and access arrangements that encourage the deployment and viability of renewables projects in Scotland.'*

Importantly, the strategy also recognises the role that the planning system will play in enabling Scotland's ambitious targets and the Update to the Climate Change Plan's outcomes, stating:

> *'Planning has been, and will remain, a critical enabler of rapid renewables deployment in Scotland. The position statement on our fourth National Planning Framework (NPF4), published in November, makes clear the Scottish Government's intention to actively facilitate decarbonised electricity generation and distribution.'*

The proposed development receives significant support from this '*Update to the Climate Change Plan: 2018-2032*' and is strongly in-line with the policies and aims which it includes. The proposal will play a key role in ensuring that the vision for 2032 becomes a reality and should therefore be approved without delay.

4.3.7 Socio-Economic Benefit

Whilst the wider socio-economic benefit of renewable and low carbon developments such as this widely accepted and acknowledged by the policies discussed above, the development also has the potential to generate a range of economic opportunities for local businesses through the construction activities required for the development as well as throughout the supply chain and during decommissioning.

Locally sourced materials and services will be preferred where possible, however this is subject to competitive tendering and is often constrained by the specialist nature of the equipment. However, there remains several benefits and opportunities for the local area including:

- Increased local spending in the area during construction and decommissioning. This includes, but is not limited to, increased spending on local accommodation, building material stores, food outlets and fuel stations.
- The use of local services for activities such as:
    - Pre-construction site investigation
    - Haulage and delivery
    - Landscaping
    - Fencing
    - Tool servicing
    - Stone, concrete and other quarry products
    - Security
- Employment opportunities created down the supply chain by those providing these services to the development during construction and decommissioning.

4.4 Assessment of Green Belt Policies

The site is situated within the South Ayrshire Green Belt, specifically within a small south-western part of the 'East of Ayr' section of green belt, which is located approximately south of the Great South Western Railway Line between Ayr (west) and Mossblown west, extending south to the A70 and south-east to the intersection of the A70 / B744, and Annbank and the River Ayr to the east. Notable developments within the local landscape, which are also located within the immediate South Ayrshire Green Belt, include Ayr substation and associated pylon line 80m east of the site and Dobbies Garden Centre directly to the south. Outside of these features the land use is predominantly agricultural.

This section considers the proposed development against relevant national and local policy relating to the development within the green belt. An assessment of the proposal and its potential effects on the green belt itself in terms of visual impact can be found within appendix 2 of the supporting Landscape and Visual Assessment (LVA).

National Planning Framework 4 (NPF4)

Policy 8 of the NPF4 addresses development in the green belt. The intent of the policy is to encourage, promote and facilitate compact urban growth and use the land around towns and cities sustainably. The aim of the policy is to achieve three outcomes:

> ***Policy Outcomes:***
>
> • *Development is directed to the right locations, urban density is increased and unsustainable growth is prevented.*
>
> • *The character, landscape, natural setting and identity of settlements is protected and enhanced.*
>
> • *Nature networks are supported and land is managed to help tackle climate change.'*

Policy 8 also contains a list of development types which will be supported within a green belt designated by a Local Development Plan. This list includes *"essential infrastructure or new cemetery provision"*. Annex F of the NPF4, Glossary of definitions, defines *"essential infrastructure"* as:

> ***'Essential infrastructure:***
>
> *Essential infrastructure includes digital communications infrastructure; telecommunications infrastructure; all forms of renewable, low-carbon and zero emission technologies for electricity generation and distribution and transmission electricity grid networks and primary sub stations; water and waste water infrastructure; and transport proposals and travel networks identified in the local development plan.'*

The proposed development is an energy storage system which provides a balancing function for the national grid network and solves the problems caused by increasing amounts of intermittent renewable energy generation being connected to the network. It is a low-carbon and zero emission technology essential for electricity generation and distribution. It is therefore classed as *'essential infrastructure'* as defined by the NPF4 and according to Policy 8 should be supported within a green belt location. Whilst the type of development is supported within this green belt location, this support will only be given if a set of five requirements can be met. These requirements are assessed individually in the table below.

1.	Reasons are provided as to why a green belt location is essential and why it cannot be located on an alternative site outwith the green belt.

The site selection process which RES have followed in order to identify this site is detailed in section 2.3 of this Planning Statement. The location of the proposed development has primarily been dictated by the location of the Ayr electrical substation, also located within the green belt, where a suitable grid connection is available.

Alternative site locations have been explored in all directions surrounding the Ayr electrical substation and the detail of this is also discussed in section 2.3. However, due to constraints such as a lack of available land, environmental designations, and physical site constraints, these alternative locations have been excluded as possible sites. Specifically, land to the east and north of the substation remain in the green belt. Land to the south of Ayr substation, outside of the green belt, and south of the A70, is already subject to a residential and commercial outline planning application and is therefore unavailable for an energy storage development. Land further to the west of Ayr substation, also outside of the green belt, and to the west of the A77, is dominated by existing residential development. No available land, of the required size, could be found. Consequently, therefore are no alternative sites for the proposed development which are located outwith the green belt.

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

The South Ayrshire LDP2 states that green belt within its jurisdiction was designated to direct planned growth to the most appropriate locations and support regeneration; protect and enhance the quality, character landscape setting and identity of towns and; protect and give access to open space within and around towns.

The proposed development has a locational requirement to be located as close as possible to its connection point. As such, the proposal's location, directly adjacent to the existing Ayr substation at which it will connect, is the most appropriate location. The proposal will also support regeneration as it will provide vital services to the electricity network in the region to ensure that the network continues to operate safely and efficiently, and it can accommodate increasing amounts of renewable energy generation.

The proposed development and the supporting Landscape Masterplan have been designed specifically to ensure that the development is 'contained' by existing and proposed vegetation surrounding the site to reduce any impacts upon the surrounding landscape. The supporting Landscape and Visual Assessment (LVA) concludes that the development will not notably adversely affect character, landscape, natural setting or the identity of settlement, nor the existing openness of the eastern area of South Ayrshire Green Belt. The significant Landscaping Masterplan will also increase biodiversity within the area, therefore enhancing the quality of the existing site.

It should be noted that the current site provides no access to open space for the general public; it is located on private land. The proposed development will therefore not impact access to current open space surrounding Ayr.

As such the proposed development will not undermine the purposes of the South Ayrshire Green Belt.

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

The supporting LVA identified only a minor adverse degree of landscape effect on the host landscapes and a minor adverse degree of visual effect from the closest area of settlement at Masonhill. In terms of the locally designated LLA J Ayr Valley the LVA identified no notable effects on the special qualities or reasoning for this landscape's designation. The proposed development will be largely screened by the proposed mitigation measures along the western boundary of the site, with some limited glimpsed views through the existing mature vegetation on the eastern boundary. In such views the proposed development would be seen in the context of the existing Ayr substation and associated pylon line which exist within this landscape. It concludes that the proposed development will not notably adversely affect character, landscape, natural setting or the identity of settlement, nor the existing openness of the eastern area of South Ayrshire Green Belt.	
4.	The proposal has been designed to ensure it is of an appropriate scale, massing and external appearance, and uses materials that minimise visual impact on the green belt as far as possible.
The proposed development has been designed sensitively to ensure that it is appropriate in terms of layout, scale, massing, and external appearance, particularly in relation to its surroundings given that the site is located adjacent to an existing electrical substation. The proposal is of a similar nature and generally smaller in size and scale to that of Ayr substation. The site has been specifically sized and designed so that it is 'nestled' behind the development of Dobbies Garden Centre and existing vegetation. An extensive landscaping proposal has also been specifically designed to ensure that the proposed development is screened from residential views from the west and that the development is fully 'contained' within vegetation to minimise any visual impact on the green belt. The supporting LVA concludes that the visual amenity within the eastern area of South Ayrshire Green Belt will not be materially adversely affected by the proposed development due to the containment of the project, resulting from the sensitive design of the proposal and the extensive landscaping masterplan. Unlike the pylon lines associated with the substation which are seen against the skyline, the design of the proposed development has ensured that the components will be relatively low level and largely screened by the existing and proposed mitigation measures. The proposed development would therefore also not interact with the skyline nor interrupt the views gained from higher elevations south-west of the site outside the South Ayrshire Green Belt at Masonhill.	
5.	There will be no significant long-term impacts on the environmental quality of the green belt.
Once operational, the proposed development will be largely screened by the proposed mitigation measures along the western boundary of the site and the existing vegetation around the site, ensuring that no enduring visual impacts are experienced within the wider green belt. Furthermore, the proposal will require only limited vehicle movements, likely to be once a month for maintenance purposes, and it will not introduce any permanent, visible artificial lighting. It will also not create any unacceptable impact in terms of vibration or noise, and it will not produce any waste. The proposed development will therefore not create any long-term significant impacts on the environmental quality of the green belt.	

Table 1. Assessment against NPF4 Policy 8 requirements

The proposed development is therefore supported by Policy 8 of the NPF4 as it is listed as a type of development that will be supported within a green belt location and it meets the required criteria to receive this support. It does not conflict with the aims and intent of this policy.

Scottish Planning Policy (SPP) 2014

The SPP provides guidance for local authorities on whether a green belt designation should be used within their Local Development Plan and provides recommendations on the form of the green belt and its boundaries.

Paragraph 49 of the SPP states:

> *'For most settlements, a green belt is not necessary as other policies can provide an appropriate basis for directing development to the right locations. However, where the planning authority considers it appropriate, the development plan may designate a green belt around a city or town to support the spatial strategy by:*
>
> *• directing development to the most appropriate locations and supporting regeneration;*
>
> *• protecting and enhancing the character, landscape setting and identity of the settlement; and*
>
> *• protecting and providing access to open space.'*

The proposed development has been located specifically adjacent to the Ayr electrical substation, where there is an available grid connection, ensuring that the proposed system can operate efficiently and effectively. As stated previously, alternative locations have been considered but ruled out due to physical and environmental constraints. The proposed location is therefore the most appropriate for this development.

The supporting Landscape and Visual Assessment (LVA) has assessed the proposal's potential effects on the character, landscape setting and identity of the area in detail. It concludes that the proposed development would not notably adversely affect character, landscape setting or the identity of settlement, nor the existing openness of the eastern area of South Ayrshire Green Belt.

Furthermore, the existing site does not provide any promoted access to open space and therefore the proposed development would not prevent access to it. The existing mature woodland to the north and the mature trees and vegetation to the east and south would be retained, and the proposed mitigation measures will provide some additional biodiversity opportunities, protecting and enhancing the current site.

The proposed development therefore does not conflict with the purposes of the green belt as defined by SPP.

Paragraph 52 of the SPP also recommends that local development plans should describe the scale and type of development which would be appropriate within the designated green belt. Relevant to this proposal, it suggests that developments such those listed below should be considered appropriate developments within a green belt location:

> *'… • essential infrastructure such as digital communications infrastructure and electricity grid connections;*
>
> *• development meeting a national requirement or established need, if no other suitable site is available; and*

• intensification of established uses subject to the new development being of a suitable scale and form.'

The proposed development represents essential infrastructure to support the electricity network in the UK in the face of increasing instability issues caused by the significant increase in intermittent renewable energy generation sources. Section 2.4 of this Planning Statement also details how energy storage systems are now acknowledged as essential in order to meet national net-zero targets by 2045; an established need for developments such as this has been demonstrated. The proposed development has also been located directly adjacent to Ayr substation and will act as an extension to the existing use of the substation. However, unlike the pylon lines associated with the substation which are seen against the skyline, the components of the proposed development would be relatively low and largely screened by the existing and proposed mitigation measures.

The proposed development is therefore considered appropriate within the green belt accounting for the intensification of established uses and being of suitable scale and form, as well as being essential infrastructure with an established national need.

South Ayrshire Local Development Plan (LDP2) 2022

The LDP2's 'greenbelt' policy states that South Ayrshire Council will only support development within the green belt if it is of a high design quality, a suitable scale and form, and meets the following criteria:

- *Contributes to the economic and environmental sustainability of existing green belt uses.*
- *Is associated with agriculture, including the reuse of historic buildings.*
- *Has horticultural (or directly related) uses.*
- *Is a recreational use that needs a green belt setting.*
- *Is required at the proposed location to provide essential infrastructure.*

In terms of potential development types within the South Ayrshire Green Belt, the proposed development complies with the following point stated within this policy:

'Is required at the proposed location to provide essential infrastructure;'

This policy also states that:

'If a development would not normally be consistent with green belt policy, we may still consider it to be appropriate either as a national priority or to meet an established need and no other suitable site is available.'

An established need for energy storage systems has been demonstrated in section 2.4 of this document; it is now widely recognised that energy storage systems are essential for the safe and secure operation of the electricity network as increasing amounts of intermittent renewable generation sources are installed. They form a crucial tool in meeting national net-zero targets.

Given the significant locational requirement of the proposal, to be located adjacent to the existing Ayr electrical substation, the established national need for energy storage systems to support Scotland in reaching its ambitious net zero targets, and the likely limited, localised nature of effects resulting from the proposal, the proposed development is therefore in accordance with LDP2's 'greenbelt' policy and constitutes supported development within the green belt.

Conclusion

Following this review of relevant green belt policies, the proposed development is deemed to be acceptable development within the green belt given its unique locational requirement, the established national need for developments of this type and its status of '*essential infrastructure*' as defined by the NPF4, the lack of suitable alternative sites and the likely limited, localised nature of effects resulting from the proposal. All of these factors demonstrate that the proposal does not conflict with the objectives of the green belt.

4.5 Summary of the Planning Balance

As evidenced in this section and the supporting documents, the proposed development will comply with the relevant adopted Local Development Plan policies. The proposal's unique locational requirements, to be in close proximity to the Ayr Electrical Substation which has available grid capacity, has necessitated its location within the South Ayrshire green belt, however, through sympathetic siting and design the proposal will not create any significant or unacceptable adverse effects on the green belt and its purposes, biodiversity, transport, heritage, flood risk, landscape, amenity and other sensitive environmental assets. The proposal has been coordinated with other infrastructure in the local area and will provide a significant contribution to combatting climate change. Consequently, the proposed development's compliance with the development plan has been demonstrated.

This section has also outlined other relevant material considerations, particularly significant energy policies and the newly adopted NPF4, to assist in the determination of the planning application and it demonstrates that they provide significant support for the proposed development. These material considerations clearly outweigh any limited contention with the development plan thereby affirming that planning permission should be granted for the proposed development in the wider public interest; the wider social, environmental and economic benefits associated with facilitating the increased production of energy from low carbon and renewable sources and achieving net zero is recognised and supported throughout the polices discussed above.

This energy storage proposal represents low carbon energy infrastructure which is crucial to enable the increased installation of renewable energy generation for which there is there is a clear and urgent national need if Scotland is to achieve its world leading net zero target by 2045. There is a climate emergency, and as stressed by the NPF4, this must hold considerable weight in the planning balance which can no longer be approached as it has been in the past.

This development is therefore strongly aligned with the policies of the South Ayrshire Local Development Plan and is supported by the material considerations discussed in this section, including the NPF4, Scotland's Energy Strategy and its Update to the Climate Change Plan, as well as relevant green belt policies. It is therefore considered that, on balance, the benefits of this proposal significantly outweigh any limited impacts which may arise from the development.

5 Technical Assessments

A number of supporting technical assessments have been carried out to support this full planning application. They have been submitted alongside this document, however, a summary of each of these is provided here.

5.1 Landscape

A Landscape and Visual Assessment (LVA) has been completed by Pegasus Ltd. in order to consider the site and its surrounding context in both landscape and visual terms, to assess the potential effects of the proposed energy storage facility upon landscape features, landscape character and visual amenity. This assessment was completed via a desk study analysis of the site and its policy context, as well as site visits to gain an appreciation of the landscape and visual context of the site. Alongside the LVA, a detailed Landscape Masterplan has been completed and included within the assessment.

Landscape Character

The site lies between Landscape Character Type (LCT) 66 - Agricultural Lowlands - Ayrshire to the south and LCT 68 - Lowland River Valleys - Ayrshire to the north, as characterised within the Nature Scot Landscape Character Types Digital Map, published in 2019. Key characteristics of LCT 66 include:

> *'Complex landform, gently increasing in height from the coastal fringe, dissected by many burns and streams draining to incised main river valleys to create an undulating lowland landscape.*
>
> *Generally small to medium scale landscape.*
>
> *Fields often regular in shape and enclosed by beech or hawthorn hedges, with mature hedgerow trees giving the landscape a surprisingly wooded character.*
>
> *Number of larger towns and villages with historic cores surrounded by more modern development.*
>
> *Several major road corridors creating a degree of conflict between the rural character and presence of heavy traffic.*
>
> *Varying landscape character which ranges from very rural to more fragmented and developed landscapes on urban fringes.*
>
> *Views tend to be dictated by the local topography and landcover.'*

Key characteristics of LCT 68 include:

> *Series of incised, narrow river valleys bounded by steep slopes which cross the agricultural lowlands of Ayrshire.*
>
> *Pastoral farming character with hedgerow field boundaries and valley slopes which are frequently wooded with stands of beech and semi-natural woodland.*
>
> *Rich woodland of the river valleys often incorporated into designed landscapes.*
>
> *Intimate small scale landscapes which often lie hidden within the wider agricultural lowlands*
>
> *More intensive farmland is present on softly rolling ground.*
>
> *Views tend to be enclosed, short distance and focused along the diverse river valley landscape. There are open elevated views over the valleys from settlements and roads sited on upper slopes.*

The proposed development would directly affect a very small northern part of LCT 66 Agricultural Lowlands - Ayrshire and a very small southern part of LCT 68 Lowland River Valleys – Ayrshire, both of which are already influenced by main transport routes, settlement and infrastructure, including Ayr substation, a number of pylon lines and communications masts and Dobbies Garden Centre. Given the relatively low heights of the proposed development and screening by the existing mature woodland directly north-east, mature trees to the east and south and proposed mitigation measures including tree and shrub planting along the western boundary effects on LCT 66 and LCT 68 would be Minor adverse long-term. Over time as the proposed planting matures effects would reduce as the proposed development becomes further integrated within the local landscape.

Designated Landscapes

The proposed development would be located directly south-west outside the South Ayrshire Local Landscape Area (LLA) J The Ayr Valley. The proposed development would be visible from the edge of the woodland within the LLA directly north-east of the site. However, there are no promoted routes which would provide access to this woodland edge. Beyond the woodland edge actual views of the proposed development from within the LLA would be fully screened by the mature trees and vegetation along the River Ayr and either side of the A77. Given the relatively low heights of the proposed development and screening by existing mature woodland and trees the proposed development would not directly or indirectly affect the woodland character of the River Ayr valley, related recreational routes nor cultural associations and the reasons for the LLAs designation. It is concluded that there would be no notable effect on LLA J The Ayr Valley.

Visual

The proposed layout has sought to integrate and minimise potential visual effects through siting the proposed development in close proximity to Ayr Substation, and using the existing vegetated field boundaries and introducing appropriate mitigation measures.

Notable visual effects on local residents arising from the proposed development would be limited to views experienced by some residents within elevated areas of Masonhill 0.6km south-west of the site. These receptors would experience a Moderate adverse and temporary visual effect during construction, although construction activities would affect only a small portion of the background of available views and would be largely back clothed by the vegetated site boundaries. Following construction, a Minor adverse visual effect is anticipated for operational Year 1; much of the proposed development would be screened by the mature existing tree line north and west of Dobbies Garden Centre and the proposed bund and tree/shrub planting. Visual effects would reduce further as mitigation planting matures.

Visual effects on recreational users on the closest Core Path SA16 directly east of the proposed development would be Minor adverse to No Effect during construction and operation. From very short sections of the A77 directly west of the proposed development and the A70 0.1km south a Moderate adverse temporary visual effect would be experienced during construction reducing to Minor adverse for operational Year 1 and Minor adverse to No effect by Year 15.

No notable visual effects are anticipated from other residential, recreational and road user receptors.

The assessment concludes that, from a landscape and visual perspective, any effects on landscape character as a result of the proposed development would be confined to the surrounding local areas, with visual effects reduced by the proposed mitigation planting. As the proposed planting matures the proposed development

would be further integrated within the local landscape with some additional biodiversity opportunities. Overall, the total extent of the landscape and visual effects would be localised and limited in nature.

5.2 Ecology

A Preliminary Ecological Appraisal (PEA) has been completed by SLR Consulting Limited to assess the potential impacts on local ecology as a result of the proposed development and to inform further site design, mitigation and assess the need for further survey work. Baseline information within the PEA comprises an initial desk-based study and a field survey. A Biodiversity Net Gain (BNG) Assessment has also been completed.

Statutory and Non-Statutory Designated Sites

There are no statutory designated sites of national or international importance within 2km of the application site. Witchbrae Wood, a woodland of semi-natural origin, is located immediately north of the red line boundary of the site, however, the ancient woodland will not be disturbed through any direct management such as felling, coppicing or understory clearance.

With regard to non-statutory designations, the site is situated within the Galloway & Southern Ayrshire UNESCO Biosphere reserve. The habitats identified on the site are of limited value to the Biosphere Reserve and, with the proposed habitat enhancement and creation detailed in the supporting BNG Assessment, the site has the potential to become a more valuable resource for biodiversity.

Habitats

A Preliminary Ecological Appraisal of the application site was undertaken in June 2022, which covered all land within the application site and lands surrounding the application site boundary. The site was surveyed to identify the broad habitat types present in accordance with the UK Habitat Survey (UKHab) methodology, this was extended to include preliminary checks for notable, protected, or rare species of both flora and fauna.

The construction of the proposed development will occur over three main habitats which have been identified as:

- **g3c8 – Holcus-Juncus neutral grassland** - Where the battery storage is proposed to be constructed lies on a grassland with poor species assemblage that is dominated by approximately 70% Juncus and creeping buttercup, which are tolerant to wet ground conditions. The area of g3c8 lost will be retained as g3c grassland, as per the Landscape Masterplan.
- **g4 - Modified Grassland** - The coniferous tree plantation portion of the site is identified as modified grassland due to the trees being grown for the purpose of Christmas and are felled every year. The plantation is comprised of a singular species, likely Northern Fir and is regularly managed with signs of cutting from the base. This creates small piles of deadwood at the base of each tree but due to the regular disturbance it is unlikely to be used by protected species. It is considered that this would be deemed similar habitat to arable crop due to the management methods but the understorey is of a more valuable habitat. Therefore, this has been assessed as a modified grassland.
- **w2c – Other Coniferous Woodland** - Coniferous woodland located within the red line boundary but not associated with the plantation. It contains a small area of younger, stunted coniferous trees and scattered willow trees.

Protected and Notable Species

Although no field signs were identified during the site walkover, there is good foraging and sett creation habitat present on site for badgers. It is recommended that a pre-construction badger survey should be undertaken to provide an updated baseline of badger activity and search for setts. This should be conducted three months prior to works commencing.

Whilst no field signs of otter were identified during the walkover survey and the habitats on site offer limited potential for otter to seek shelter, the River Ayr is 150m north of the site which offers potential use by otter. A pre-construction otter survey should therefore be conducted three months prior to construction works commencing to establish the presence of any otter field signs and resting sites along the River Ayr within 250m of site.

Similarly, the site provides poor habitat for ground nesting birds due to the annual cutting of the Christmas tree plantation/the management of the g4 habitat. The woodland to the northeast of the site does offer potential for nesting birds. Consequently, it is recommended that site clearance works and construction works take place outside of the breeding bird season (March to August/early September inclusive).

With a lack of permanent waterbodies on or within 500m of site, there is limited potential for breeding amphibians, including Great Crested Newt. However, with moderate terrestrial habitat on site and good terrestrial habitat in the surrounding habitats, some of which are adjacent to site, there is the potential that amphibians and reptiles could be found on site. It is therefore recommended that a two-stage cutting regime should be implemented for the clearance of grassland habitat to allow common amphibians and reptiles to disperse safely.

Whilst no bats were observed, five trees along the hedgerow to the north of the site noted as having bat roost potential are within 30m of the proposed access track. Linear woodland and mature woodland to the north also had potential features suitable for bat roosts. Consequently, a pre-construction survey will be recommended to be conducted three months prior to site clearance/commencement of construction works to establish the presence or likely absence of roosts.

The site provides suitable habitat for protected invertebrates, including in their larval stage. However, the site is of limited value with dominant stands of herbs and grasses of a limited diversity. Nevertheless, it is recommended that enhancement opportunities be implemented where possible such as including plants suitable for pollinator species and protected invertebrates within any landscaping.

With the implementation of the pre-commencement surveys and mitigation measures recommended above, it is considered that there will be no significant adverse effects upon protected or notable species during construction of the proposed development.

Biodiversity Net Gain Assessment

Whilst Scotland does not set out that the Biodiversity Net Gain metric must be used to evidence net gain, RES are committed to enhancing biodiversity within and around energy storage projects. Together with the PEA and Landscape Masterplan, the proposal incorporates a number of habitat creation and enhancement measures, including:

- Planting of new native trees and scrub to the west of the energy storage compound, and new native tree and shrub infill planting to the south.

- Grassland toward the west of the proposed bunds and along the edges of the access track will be enhanced from 'moderate' to 'good' neutral grassland.
- The creation of good quality grassland surrounding the energy storage compound.
- Installation of features such as artificial bat roosts and bird nesting boxes to provide additional roosting and nesting opportunities for a range of species.
- Installation of insect 'hotels' to provide additional refuge opportunities for invertebrates.
- The placement of log piles along the bordering woodland habitats. Any additional log piles will offer shelter to protected species such as herpetofauna species and invertebrates, and therefore, provide feeding resources to protected species such as birds, bats and mammals.

With the implementation of these, the potential of the site to support local wildlife will increase and the proposed development is likely to lead to a significant positive effect on a number of protected species during the operational phase. The BNG assessment concludes that the development will lead to a net gain for biodiversity of 15.52% for habitat area and 100% in river habitats.

5.3 Heritage & Archaeology

An assessment of the proposed development's potential impacts on cultural heritage and archaeology has been completed by SLR Consulting Ltd. The assessment includes the results of a site survey conducted in July 2022 and an examination of published and unpublished records.

Following a review of the available evidence, the potential for unknown prehistoric and early historic heritage assets within the site is low as there are no known heritage assets of these dates within the site. The potential for unknown early-medieval or medieval heritage assets within the site is also low. The potential for unknown post-medieval heritage assets within the site is low-medium. A path linking the mills at the River Ayr to Holmston is clearly shown to run through the northwest corner of the field within which the proposal sits. Modern satellite imagery shows that this path is still in use, but there is the potential for surviving archaeology associated with the original path.

The assessment has not identified any recorded heritage assets within the site. The available evidence indicates a lack of potential for unrecorded remains. Should any remains survive buried within the site they would most likely be post-medieval and agricultural in nature or remains of a path/trackway running between Holmston and the River Ayr. These remains would retain little, if any, archaeological interest, and as such, they would not warrant preservation in situ or otherwise preclude development within the site.

17 designated heritage assets were identified within the 2km study area. Of these, 15 assets are all Category B and C listed buildings associated with the development of the modern town of Ayr. As the setting of these assets is the town of Ayr itself, and they are all now contained within the footprint of the modern town, it is not considered that they will be impacted by changes to long range views beyond the town. As such, in line with HEPS (2019) the impact would be considered neutral, with a lack of significant adverse change to setting that could affect significance.

Glaisnock ring ditch is a Scheduled Monument located approximately 1.5km to the northeast of the site, which is on the opposite side of the River Ayr. There is a lack of visibility to or from the asset of the site, and the proposal is not located between the asset and its setting (the river), meaning that the proposed development will not have an impact on the ability to appreciate, understand, and experience the asset or contributors to its setting.

Craigie, Ayrshire management Centre, is a Category A Listed manor house located 1.1km to the east of the proposal site. Between the site and the asset, modern development has taken place including the growth of the town of Ayr itself, which acts as a screen and also highlights how much of the original setting of the estate has been removed. The lack of visibility between the site and the asset, the existing modern development in the area, and the fact that key contributors to the setting are located to the south and west, and therefore will not be affected by the development to the east, means that, in line with HEPS (2019), the predicted impact is neutral. There would be no significant adverse change to the asset or its setting through the development which would affect cultural heritage significance.

In summary, the assessment has not identified anything that would preclude development within the site, in principle, in relation to cultural heritage or archaeology.

5.4 Noise

An assessment in accordance with BS 4142: 2014 has been undertaken and submitted in support of this application in order to determine the acoustic impact of the proposed development.

The main sources of sound within the proposed development are the cooling fans for the inverters housed within the Power Conversion System (PCS) units, air conditioning for the Energy Storage Systems (ESS) and the transformers. The ESS units are expected to be continuously charging and discharging. If there are any rest periods for the PCS units these are likely to be infrequent and the Heating Ventilation and Air Conditioning systems (HVAC) will still be functioning.

The expected acoustic emissions from the equipment within the proposed development has been assessed against the baseline noise level within the vicinity of the site, with specific reference to background noise levels at 11 properties, or groups of properties, located closest to the proposal. A level of conservatism has been built into the assessment to compensate for the potential impact of uncertainty.

The impact of the proposed development is low where the rating sound level does not exceed the existing background sound level. This is the case at all properties during daytime periods, evening and night periods. No observed effect on health or quality of life would be expected where the impact is low. The assessment therefore shows that, with the implementation of appropriate mitigation measures, a low impact during daytime, evening and night periods would be anticipated.

5.5 Flood Risk and Surface Water Management

A full Flood Risk Screening and Surface Water Management Plan has been submitted alongside this application. It has been completed in accordance with early consultation with South Ayrshire Council and relevant policy.

The proposed development is deemed at no risk of flooding from all sources and the development is not considered to exacerbate the flood risk anywhere on or off site.

An assessment of the drainage options has also been undertaken and an outline drainage strategy has been prepared, to be refined further following on site testing of ground conditions prior to construction commencing. In line with the drainage hierarchy, infiltration is the preferred drainage option for surface water drainage. Although infiltration testing will be carried out, it is anticipated that the ground on site is unlikely to be able to support drainage by infiltration. As such, the current proposal is to drain the site via an attenuation basin located to the west of the compound. Water will then discharge from the basin at a

restricted flow rate into the ditch abutting the north-western boundary via a new outfall pipe. The new outfall pipe will approximately follow the route of the existing which will be removed as its condition cannot be confirmed. This solution will then maintain the existing hydrological pathway which ultimately leads to the River Ayr.

The attenuation basin has been sized to contain the 1 in 200 rainfall event plus a 40% allowance for climate change, as confirmed appropriate by South Ayrshire Council.

A site investigation, 3D earthworks design, earthing design, and a further assessment of the proposed discharge will be undertaken to inform the detailed design of the site drainage before construction.

Overall, the proposed development would neither be at unacceptable risk of flooding, nor increase flood risk on or surrounding the site.

5.6 Transport

A full Transport Statement has been submitted in support of this planning application. The document gives details of the anticipated traffic movements associated with the construction of the proposal as well as during the operational phase. It also assesses the suitability of the strategic road network to accommodate the development and provides the proposed transport route to the site.

The proposed transport route to site is to utilise the existing motorway network until it leads onto the A77 toward Ayr. The existing entrance to the commercial Christmas tree business, which is accessed off the A77, will be utilised to access the site. From the site entrance, the existing track through the Christmas tree field will be upgraded to access the energy storage compound toward the east of the field. The A77 is a major road in Scotland with trunk road status and is therefore capable of supporting the delivery of infrastructure. Furthermore, following comments made by Transport Scotland during pre-application discussion, a strict 'no right turn' rule upon entering and exiting the site will be enforced to ensure that vehicles do not need to cross oncoming traffic on the A77. With this in place, no significant issues with the use of this transport route have been identified.

Throughout the construction phase there will be a combination of HGVs (for the component and material deliveries) and cars/vans (for construction staff), visiting the site. HGV movements are expected to be most intense throughout the first weeks of construction whilst car/van movements are expected to be constant throughout. Following the construction of the project, vehicle movements to and from the site are expected to be limited to occasional maintenance visits, usually around one per month by a car, van or light goods vehicle.

Overall, the proposed development utilises a major trunk road and an existing site entrance which is frequently used to serve the commercial Christmas tree field. As such, it would not give rise to any severe or otherwise unacceptable impacts on the safety or operation of the local highway network.

6 Pre-application Consultation (PAC)

The proposed development constitutes a 'Major Development' as the proposed capacity is, or exceeds, 20 megawatts. This requires RES to carry out Pre-Application Consultation (PAC) with the local community; a full PAC report has therefore been submitted in support of this planning application, setting out the consultation activities completed to date.

The COVID-19 emergency means that, during the period of Pre-Application Consultation for this proposal, it has not been possible to hold public meetings without unacceptably posing a significant risk to public health. Furthermore, the *Town and Country Planning (Miscellaneous Temporary Modifications) (Coronavirus) (Scotland) Regulations 2020* has temporarily suspended the requirement for a public event in relation to PAC during the emergency period. Consequently, an online public exhibition was held in place of an in-person public event. The details of this public event, the materials provided and the advertisement which took place can be found in the supporting PAC report.

RES engaged early with the local community to encourage a constructive consultation process and has undertaken all necessary statutory pre-application consultation. Unfortunately, there was a very limited response from stakeholders and the local community. The main concerns raised from the consultation were in relation to the visual impact of the proposed development. Nevertheless, RES is committed to being a good neighbour; anyone can contact the company about the development at any stage and RES will respond in a timely manner. Contact details have been made available via the project website which will be updated regularly to enable people to keep up to date with the latest news about the proposed development.

7 Conclusions

It is considered that the proposed development complies with the requirements of all relevant development plan policies and other local and national policy and guidance, and there are no other material planning considerations that suggest that the proposed development should be opposed. The proposed development is, undisputedly, sustainable and low carbon development, which is supported and encouraged by policies within NPF4, Scottish Planning Policy and the South Ayrshire Local Development Plan as well as Scotland's current energy policies.

The proposed development has a unique locational requirement to be positioned in this particular site, directly adjacent to the Ayr Electrical Substation, where there is the available capacity to connect to the grid network. Every effort has been made to ensure that any impacts upon the surrounding area are kept to an acceptable level and the supporting technical assessments conclude that:

- Whilst some minor landscape impacts may be possible at nearby sensitive receptors, the total extent of the landscape and visual effects would be localised and limited in nature. The proposed landscaping and planting will significantly help to reduce any impacts and ensure they remain at an acceptable level.
- No observed adverse effect on health or quality of life would be expected due to noise from the proposed development.
- There will be no significant adverse effects on any statutory or non-statutory designated environmental sites as a result of the proposed development. With the implementation of pre-commencement surveys and the proposed mitigation measures, it is considered that there will also be no significant adverse effects upon protected or notable species. The proposed habitat creation and enhancement measures mean that the proposed development will lead to a positive effect on biodiversity.
- There will be no significant adverse effects on any designated or non-designated cultural heritage assets as a result of the proposed development. The potential for significant buried archaeological remains within the study site is also low.
- The development will not be at unacceptable risk of flooding, nor increase flood risk on or surrounding the site. A suitable SUDS has been proposed and will be implemented following further site assessment to manage surface water.
- No severe or otherwise unacceptable impacts on the safety or operation of the local highway network would be observed.
- The development is deemed to be appropriate development within the green belt.
- The development is compliant with the policy objectives of the NPF4, Scottish Planning Policy, Scotland's Energy Strategy, Scotland's Update to the Climate Change Plan, and the South Ayrshire Local Development Plan.

There is an urgent need for energy storage facilities, such as this proposal, in order to facilitate the increased penetration of renewable and low carbon generation by providing critical flexibility services to smooth out

the peaks and troughs of generation and demand, therefore ensuring continuity, security and decarbonisation of Scotland's energy supply. This application therefore must be viewed in the context of a national climate emergency and Scotland's ambitious net zero emissions targets. It is considered that the significant benefits from this proposed storage development outweigh any limited local impacts which have been satisfactorily mitigated by way of a carefully considered siting and design approach. It is therefore requested that South Ayrshire Council grant planning consent for this crucial development without delay.

Appendix A

A.1 Schedule of Drawings

Drawing Number	Drawing Title
04874-RES-MAP-DR-XX-001	Location Plan
04874-RES-LAY-DR-PT-001	Infrastructure Layout
04874-RES-BAT-DR-PT-001	Battery Enclosures
04874-RES-PCS-DR-PT-001	Power Conversion System and Transformer
04874-RES-SUB-DR-PT-001	Auxiliary Transformer
04874-RES-SUB-DR-PT-002	Grid Compliance Equipment
04874-RES-SUB-DR-PT-003	Spares Storage Container
04874-RES-SUB-DR-PT-004	Substation Building
04874-RES-SEC-DR-PT-001	Typical Security Fencing
04874-RES-SEC-DR-PT-002	Acoustic Fencing
04874-RES-SEC-DR-PT-003	Lighting and CCTV

A.2 Schedule of Technical Reports and Documents

Report / Document	Author
Landscape and Visual Assessment	Pegasus Ltd
Landscape Masterplan	Pegasus Ltd
Preliminary Ecological Appraisal	SLR Consulting Ltd
Biodiversity Net Gain Assessment	SLR Consulting Ltd
Historic Environment Desk-Based Assessment	SLR Consulting Ltd
Acoustic Assessment	RES Ltd
Flood Risk Screening and Surface Water Management Plan	RES Ltd
Transport Statement	RES Ltd
Construction Environmental Management Plan	RES Ltd
Pre-Application Consultation (PAC) Report	RES Ltd