

INSTALLATION OF 49.9 MEGA WATT BATTERY ENERGY STORAGE FACILITY

at

322 BROOMLOAN ROAD GLASGOW G51 2JQ

on behalf of

LIFETIME PROPERTY LIMITED

PLANNING STATEMENT

1 Executive summary

- 1.1 Lifetime Property Limited seeks planning permission for the installation of a 49.9 mega watt battery energy storage facility at 322 Broomloan Road, Glasgow City Council.
- 1.2 The site forms part of the Helen Street/Loanbank Industrial Estate, and is currently used as a distillery storage yard.
- 1.3 This statement provides details of the proposed development and sets out the policy context against which the application requires to be considered, together with material planning considerations in support of this, demonstrating why the application should be approved.
- 1.4 For the reasons given in this statement, it is submitted that the development:
 - complies with the Glasgow City Development Plan (2017) (LDP), with this being consistent with the City Profile, Strategic Approach and relevant policies, namely Policies CDP 1, CDP 2, CDP 3, CDP 5 and CDP 11, together with associated Supplementary Guidance (SG); and
 - is also supported by relevant material considerations, namely the Council's Interim Planning Guidance IPG3 Economic Development, Scottish Planning Policy, and Scottish Government Draft Advice on Net Economic Benefit and Planning.
- 1.5 Specifically, the development:
 - is consistent with the site's existing use;
 - will not have any negative impact on existing business on the industrial estate or on the amenity of residents in the surrounding area;
 - will provide a clean and stable source of renewable energy; and
 - deliver net economic benefits.
- 1.6 As the development complies with the Development Plan and is supported by relevant material considerations, with no material considerations indicating otherwise, the application should be approved.



2 Background

- 2.1 The Scottish Government is committed to tackling the climate emergency and to Scotland becoming carbon neutral by 2045, with the shift to renewable energy making a significant contribution towards meeting carbon reduction targets. With an increasing emphasis on renewable energy production, there is an associated increased need to balance that energy generation (which by its nature is more sporadic than traditional sources of energy) with demand, to ensure grid stability. Battery energy storage facilities allow energy to be stored during peak renewable energy generation periods and released when demand outstrips generation, with these therefore being considered as renewable energy infrastructure. The facility proposed by way of this application will contribute to the management of the supply of renewable energy, with the batteries fed from, and transmitting back to, the existing substation located on Helen Street, adjacent to the application site.
- 2.2 Given the capacity of the proposed facility, the letter from the Chief Planning issued in August 2020 makes it clear that it is classed as a major development in terms of the planning hierarchy. That being the case, statutory pre-application consultation was carried out in accordance with the Proposal of Application Notice (reference 21/03836/PAN) that was received by the Council on 26 November 2021 and confirmed to be satisfactory on 17 January 2022, with the Pre-application Consultation Report submitted with the application.
- 2.3 An Environmental Impact Assessment (EIA) screening request has also been submitted, with it considered that the proposed development does not constitute EIA development.

3 The application

- 3.1 The application site extends to 0.7ha and comprises a distillery storage yard, within the Helen Street/Loanbank Industrial Estate, on the west side of Broomloan Road. The site is bounded to the north, east and south by industrial uses, and by the railway line to the west. It is served by an existing access directly off Broomloan Road with no changes to that proposed.
- 3.2 The distillery storage yard is due to relocate, with the site providing an ideal location for a battery energy storage facility given the nature of the surrounding uses and the proximity of the existing electricity sub-station on Helen Street, adjacent to the site. The facility would connect to this sub-station and be used to store energy from renewable sources when demand is lower (at night) for redistribution when demand is higher (during the day).
- 3.3 As shown on the plans submitted with the application, the proposed development comprises the redevelopment of the storage yard to deliver 22 battery containers, each of which measures 2.4m x 12m, with a total capacity of 49.9 mega watts, together with associated



infrastructure (transformers, converter stations, sub-station, parking, new internal road, security fencing, security columns and security lighting). The proposed battery containers, transformers, converter stations and sub-station would all be no more than 2.8m in height (as measured from finished ground level), while the proposed security fencing would be 2.4m high, with the design and scale of these being consistent with the surrounding built development, which is all industrial in nature. It should also be noted that the facility would be unmanned, with only occasional maintenance vehicles requiring access to this once operational.

4 Policy context

- 4.1 The Town and Country Planning (Scotland) Act 1997 requires planning applications to be determined in accordance with the development plan, unless material considerations indicate otherwise, with the Development Plan in this instance comprising the Glasgow and the Clyde Valley Strategic Development Plan (2017) (SDP) and the Glasgow City Development Plan (2017) (LDP).
- 4.2 The vision of the Clyde Valley Strategic Development Plan is that "By 2036 Glasgow and the Clyde Valley will be a resilient, sustainable compact city region attracting and retaining investment and improving the quality of life for people and reducing inequalities through the creation of a place which maximises its economic, social and environmental assets ensuring it fulfils its potential as Scotland's foremost city region." Achieving a compact city region is based on a number of factors, including the provision of low carbon infrastructure, which in turn is to be delivered through supporting policies. Of particular relevance to this application, Policy 10 Delivering Heat and Electricity states support should be given, where appropriate, to alternative renewable technologies and associated infrastructure to enable the transition to a low carbon economy. The SPD therefore provides clear support to the renewable energy infrastructure proposed in terms of this application in principle.
- 4.3 In terms of the LDP it is important to note that, as stated on page 7 of the Plan, this requires to be read as a whole, with due consideration to be given to the City Profile and Strategic Approach as well as the relevant policies, and this approach is followed below accordingly. At the same time, due consideration also requires to be given to Supplementary Guidance (SG) adopted under the LDP, which has the same weight in the decision making as the LDP itself.
- 4.4 The LDP's **City Profile** highlights that one of the key issues for Glasgow is ensuring that the city is in a resilient position to respond to environmental challenges in coming years. As the development proposed by way of this application will redevelop a brownfield site that will contribute to ensuring stability in the supply of renewable energy, it is clearly consistent with the City Profile in these regards.



- 4.5 The LDP's **Strategic Approach** then identifies two key aims; creating and maintaining a high quality, healthy place, and developing a compact city form that supports sustainable development, while the Plan's strategic outcomes include the delivery of a green place, by increasing the City's resilience to climate change and ensuring that the city uses less carbon based fuels, with a greater proportion of the city's energy coming from renewable sources. Again, the proposed battery energy storage facility clearly contributes to this outcome by ensuring stability in the supply of renewable energy on a brownfield site within an existing industrial estate with no adverse impacts on residential or other amenity (for more details on which see paragraph 4.8 below).
- 4.6 In terms of the LDP's spatial strategy, the application site is located within an allocated Economic Development Area, with details on how the application complies with the requirements of such areas provided in paragraphs 5.2 and 5.3below.
- 4.7 In addition to relevant provisions with regards to Economic Development areas, all other relevant policies and associated in SG are addressed below, including two overarching policies with which all applications are expected to comply.
- 4.8 The first of the overarching policies, **Policy CDP 1** The **Placemaking Principle** aims to improve the quality of development in Glasgow, and requires that new development should aspire to achieve the six qualities of place as defined in Scottish Planning Policy (SPP). Further detail on this is provided in **SG The Placemaking Principle**, which highlights that the way in which proposals contribute towards the creation of successful places will depend on the nature, type, scale, complexity, and sensitivity of individual schemes, requiring Policy CDP1 and the associated SG to be applied proportionately. Taking a proportionate approach to this application, given the nature of the development and its location within an existing industrial estate, this demonstrates the relevant six qualities of place in that it would be:
 - **distinctive** with the nature and scale of the facility being consistent with that of the existing surrounding industrial uses;
 - safe and pleasant with the facility incorporating a number of safety measures including, for example, a battery management system which ensures the batteries operate within safe temperatures, detection systems to identify any temperature increases or other potential issues before they cause any harm, and fire suppression systems. A noise impact assessment has also demonstrated that there will be no adverse noise impacts on neighbouring properties, including the nearest residential properties and primary school, thus ensuring that existing amenity is duly protected, with the nature of the proposed use also meaning that it presents no conflict with the operation of surrounding industrial uses. And lastly in this regard, the limited number of vehicle movements that the proposed



development would generate means that there would be no adverse impact on road safety (and indeed, the proposed development should deliver a net benefit in this regard when compared to the existing industrial use of the site);

- **easy to move around and beyond** with no change to the current access arrangements proposed;
- adaptable by adapting an existing brownfield site to a new use that responds to changing needs in terms of tackling climate change and the transition to renewable energy; and
- **resource efficient** with the very nature of the proposed use being to ensure the efficient use of both the application site and renewable energy resources.
- 4.9 In addition, Policy CDP1 expects new development to be design-led, to contribute towards making Glasgow a better and healthier environment to live in, and to aspire towards the highest standards of design while protecting the city's heritage, with the Policy identifying a number of outcomes which development is expected to achieve in these regards. The Policy does though make it clear that the level of detail and design tools required to deliver on these outcomes will depend on the size of the development, with the small scale and nature of the battery energy storage facility again requiring a proportionate approach to be taken to these. This notwithstanding, the proposed development will make a notable contribution to relevant outcomes in that:
 - it will make the city a more appealing place to live by maintaining a stable supply of renewable energy;
 - it recognises the needs of all members of society by ensuring renewable energy is more widely available when needed;
 - it will contribute to the creation of healthier environments by replacing traditional polluting fossil fuels with clean renewable sources of energy;
 - it constitutes the continued sustainable use of an existing industrial site, rather than using a greenfield location;
 - stakeholder consultation was carried out prior to the application being submitted with any concerns raised fully addressed (see Pre-application Consultation Report);
 - it constitutes new innovative renewable energy infrastructure;



- it will have no adverse impact on the historic or natural environment (see paragraph 4.18 below);
- it will provide a valuable amenity to both existing and new residents of the city by providing a stable supply of renewable energy;
- although the site will require to be accessed only for maintenance purposes, it will be easily accessible by sustainable and active modes of transport (see paragraph 4.18 below);
- it will have no impact on wider infrastructure;
- it will ensure that the site does not lie vacant when the current occupier vacates it;
- it will have no adverse impact on air quality (see paragraph 4.18); and
- as demonstrated by the noise impact assessment, it will not generate any unacceptable level of noise.
- 4.10 The second overarching policy with which all applications are expected to comply is **Policy CPD 2 Sustainable Spatial Strategy**, which aims to create a compact city form which supports sustainable development and ensure that the city is well positioned to meet the challenges of a changing climate and to build a resilient environment. In doing that, the Policy specifically supports development proposals that:
 - accord with the current National Planning Framework (this being National Planning Framework 3 which, amongst other things, supports adaptation to climate change, reduced consumption of resources and a reduction in greenhouse gas emissions, with a target of generating the equivalent of 100% of Scotland's gross annual electricity consumption from renewable sources by 2020, and recognises that improved energy efficiency and further diversification of supplies will be required to maintain secure energy supplies) and Glasgow and Clyde Valley Strategic Development Plan's Spatial Development Strategy;
 - utilise brownfield sites in preference to greenfield sites; and
 - focus economic developments in appropriate locations, including the city's safeguarded Economic Development Areas.
- 4.11 As this application specifically seeks to provide renewable energy infrastructure in accordance with National Planning Framework 3 (which supports development of this nature as set out



in the first bullet point of the paragraph above) and the SDP (as set out in paragraph 4.2 above), on a brownfield industrial site within an Economic Development Area, it should clearly be supported in line with the above provisions of Policy CPD 2.

- 4.12 Related to Policy CPD 2, associated SG includes the **Govan Partick Strategic Development Framework (2020) (SDF)**, which sets out the Council's vision for the area to 2030, including that it be recognised as a leading Innovation District, with key outcomes including that the area will be recognised as one of the most sustainable places to live and work, and one of the best-connected, low-carbon places in Scotland. In providing new renewable energy infrastructure, the proposed battery storage facility will contribute to the achievement of the Council's vision for the area and these key outcomes as set out in the SDF.
- 4.13 Due consideration also requires to be given to **Policy CDP 3 Economic Development**, the aim of which is to promote the creation of economic opportunity for all the city's residents and businesses, and to encourage sustained economic growth. In particular, Policy CDP 3 states that development proposals will be supported if they:
 - promote economic growth by, amongst other things, directing industry and business uses to the city's Economic Development Areas; and
 - support and improve the city's energy infrastructure.
- 4.14 As the proposed development constitutes a new renewable energy storage facility (a quasiindustrial use which will deliver clear economic benefits, as set out in paragraph 4.18 while improving the city's energy infrastructure as set out above), and is located within an Economic Development Area, it should be supported as being in accordance with Policy CDP 3.
- 4.15 At the same time, Policy CPD 3 seeks to ensure that Glasgow has an adequate range of marketable sites to meeting the current and future needs of incoming and future businesses, in terms of which it should be noted that the Council's interactive map of industrial and business land supply and development activity as at March 2021 shows there to be extensive areas of industrial and business land available across the city, including a number in close proximity to the site to which this application relates, such that the proposed development would have no noticeable impact on the established supply of such land, particularly given the small size of this site (0.7ha, as set out above)
- 4.16 The LDP then states that SG3 will provide further guidance on the creation of economic opportunities, with this to be developed in due course. Meantime, Interim Planning Guidance IPG3 operates as non-statutory planning guidance, and this is addressed along with other relevant material considerations below.



- 4.17 Policy CPD 5 Resource Management aims to ensure that, amongst other things, Glasgow supports energy generation from renewable and low carbon sources and benefits from secure supplies of low carbon energy and heat. To achieve that, the Policy states that the Council will support proposals that facilitate the delivery of renewable energy and heat, including technologies that generate energy and/or heat from renewable sources, and distribute it efficiently, provided they do not result in unacceptable impacts on landscape character, transport infrastructure, the amenity of surrounding uses or the water, natural or built environments, and that they comply with other policies of the Plan and associated supplementary guidance.
- 4.18 Further guidance in this regard is provided in **SG5**: **Resource Management**, which includes detailed criteria against which proposals for generating/storing/distributing energy and heat will be assessed, although it is noted that considerations will vary with the nature, scale and location of the proposal. Taking into account the nature, scale and location of the development proposed in terms of this application accordingly, these are each addressed below:
 - a) net economic impact, including local and community socioeconomic benefits such as employment, associated business and supply chain opportunities as an enabling technology that will ultimately save customers money (including through storing low cost energy and releasing it at peak periods, and avoiding costly disruptions), improve reliability and resilience (again avoiding costs of any outages), and integrate diverse resources (smoothing the delivery of energy from variable and intermittent resources), battery energy storage clearly has a net economic impact, in addition to which, construction of the facility will provide employment opportunities, with the facility also creating opportunities in the supply chain;
 - b) the scale of contribution to renewable energy generation targets (see paragraph 1.2) and effect on greenhouse gas emissions it is widely recognised that the shift to renewable energy will make a significant contribution towards meeting carbon reduction targets, with battery energy storage being a key element of facilitating that transition;
 - c) impacts on local air quality (see SG1) with no emissions arising from the proposed facility, there will be no adverse impacts on local air quality, and indeed any such impacts will be positive as a result of facilitating the shift towards the use of cleaner forms of energy;
 - d) impacts on communities and individual dwellings, including on residential amenity the application site is located on an existing industrial estate, surrounded by industrial uses and the railway line, and remote from residential properties, with this in any event not causing any increase in vehicle movements in the area as highlighted above, nor generating any emissions or pollution that would affect the local community (including in terms of



noise, as confirmed by the NIA that has been submitted with the application), and there therefore being no adverse impacts on communities and individual dwellings or on residential amenity;

- e) proximity to transport routes, buildings and open spaces the application site is well located relative to transport routes, being accessed directly from Broomloan Road, with bus stops within 150m on Broomloan Road, and Ibrox and Govan underground stations within less than 1km. In terms of buildings, as highlighted above, the application site is bounded by existing industrial buildings and compatible uses to the north, east and south, with an area of open space around 250m to the north on the east side of Broomloan Road, which would be unaffected by the proposed development;
- f) noise, vibration, shadow flicker, glint and glare the noise impact assessment demonstrates that there will be no adverse noise impact arising from the proposed development and, as no turbines or solar panels are proposed as part of the development, there will be no flicker, glint or glare;
- g) landscape (see SG7) and townscape impacts (see SG1) given that the site is located within an existing industrial estate and is of a size and scale consistent with existing development there, there will be no adverse landscape or townscape impacts;
- h) visual impacts, including those relating to the design of the development see g) above;
- i) effects on the natural heritage, including birds, woodlands and trees (see SG7), open space and the Green Network (see SG6), including how the development would enhance biodiversity and the Green Network (see paragraph 2.7) there are no natural heritage interests on or near the site, such that there will be no adverse effects on these and, given the distance of the application site from any open space or elements of the Green Network, there will also be no adverse impact on those;
- j) impacts on carbon rich soils and peatland (see Figure 1 but subject to SNH update (carbon and peatland map)), using the carbon calculator for wind farm proposals – the application site does not contain any carbon rich soils or peatland and so there will be no adverse impacts on these;
- k) public access, including impact on long distance walking and cycling routes and scenic routes identified in the NPF (see SG6, SG11) there is currently no public access to site therefore the proposed development will no impact on any such routes;



- impacts on the historic environment, including scheduled monuments, listed buildings and their settings and conservation areas (see SG9) - the application site is not within a conservation area and there are no scheduled monuments or listed buildings on or near the site, such that there will be no adverse impacts on any such features arising from the proposed development;
- m) impacts on tourism and recreation given that the site is located within an existing industrial estate, there will be no impacts on any tourism or recreation assets;
- n) impacts on aviation (see SG11 re airport safeguarding area), defence interests and seismological recording the nature of the proposed development and the location of the application site means that there will be no adverse impact on any of these interests;
- o) impacts on telecommunications and broadcasting installations, particularly ensuring that transmission links are not compromised see n) above;
- p) impacts on trunk roads and on the generation of road traffic and its associated impacts on communities – the facility will use an existing access with no changes proposed to that and, as an unmanned facility, traffic any traffic generated by the development will be less than that associated with the existing storage use of the site as set out above, hence any impacts on the community will be positive in this regard;
- q) effects on hydrology, the water environment and flood risk (see SG8 and SEPA guidance) the flood risk assessment demonstrates that the site is not affected by river flooding, and, while there is a medium risk of flooding from surface water, and a high risk of groundwater flooding, that not expected to prevent access to the site. To mitigate these risks, the flood risk assessment recommends that the equipment on the site be installed at a minimum of 150mm above ground level to allow for protection from ground water flooding and to provide water paths around the site (with that shown on the elevations submitted with the application) and that a series of gullies are installed to allow the water to drain away faster (with our client happy to accept a condition requiring these to be installed prior to the installation of the battery energy storage equipment). In addition, with there being no increase in impermeable areas, or the current hydraulic conditions and loads into the surface water system, and no increase in the rate of surface water discharge from the site when compared with the current use, the flood risk assessment concludes that the current surface water drainage system is adequate for the proposed development and there would be no adverse impact on surface water flood risk at the site or surrounding area. Finally in respect of flooding, the flood risk assessment is clear that there proposed development will have no adverse impact on public safety (with that particularly being the case since the site will be unmanned and has no public access);



- r) the need for conditions relating to the decommissioning of developments, including ancillary infrastructure, and site restoration (see paras 2.11-2.15) the battery storage containers and other infrastructure can be easily removed from the site when no longer required;
- s) opportunities for energy storage the application is for a battery energy storage facility;
- t) for wind energy developments, the Spatial Framework for Wind Energy (see Section 3 of this SG) this criterion is not applicable to this application; and
- u) cumulative impacts there are no other battery energy storage facility in the surrounding area, such that no cumulative impacts arise.
- 4.19 Given that the proposed battery energy storage facility will help secure the supply of renewable energy, with this having no adverse impact on any of the features set out in the Policy and complying with the assessment criteria set out in the supplementary guidance as set out above, while also complying with all other relevant LDP policies and supplementary guidance as demonstrated elsewhere in this statement, it should again be supported as being in accordance with Policy CPD 5 and SG 5.
- 4.20 Finally in terms of relevant LDP policies, **Policy CDP 11 Sustainable Transport** aims to ensure that Glasgow is a connected city, characterised by sustainable and active travel. To achieve that, the Policy directs major development to locations well served by existing public transport services and active travel routes, with such developments informed by a Transport Assessment. As set out above, the proposed development will be an unmanned facility with access required only for maintenance purposes, such that any traffic impacts will be considerably less than those arising from the existing storage use of the site, and it has been agreed as part of the processing agreement for the application that a Transport Assessment is not therefore required. That notwithstanding, as also highlighted above, the site is well located for access by sustainable and active modes of travel and therefore clearly complies with Policy CDP 11 in this regard.

5 Material considerations

Glasgow City Council Interim Planning Guidance IPG3 Economic Development

5.1 While adopted Supplementary Guidance on Economic Development is expected in due course, IPG 3 constitutes a material consideration in the meantime, and provides further detailed advice on how Policy CDP 3 can be implemented within different areas of the city.



- 5.2 In particular, this seeks to ensure that Economic Development Areas continue to give preference to proposals in Use Classes 4 (Business), 5 (General Industrial) or 6 (Storage or Distribution) of the Town and Country Planning (Use Classes) (Scotland) Order 1997. It does though also recognise that there may be circumstances where proposals for uses outwith these Classes will be acceptable and that such proposals may be considered favourably subject to compliance with a number of criteria as follows:
 - not have a detrimental impact on the character of the economic development area, and
 its continuation as an industrial and business location as highlighted above the
 proposed use is compatible in nature, scale and design to existing surrounding uses and
 would not therefore have any adverse impact on these or on the wider industrial estate;
 - not have an adverse impact on the quantity, quality or distribution of EDA land supply –
 in terms of which there is an extensive supply of business and industrial land available
 across the city as highlighted above and, together with the fact that the application site
 covers an area of just 0.7ha within a much larger industrial estate, the proposed
 development will therefore have no noticeable impact in this regard; and
 - not prejudice the operation of adjoining businesses the noise impact assessment demonstrates that there would be no adverse noise impacts arising from the proposed development and there will be a reduction in traffic generation compared to the existing storage use, with there therefore being no prejudice to the operation of adjoining businesses.
- 5.3 Further, the Guidance states that such proposals will be expected to promote and support opportunities for integrating efficient energy innovations to comply with Scottish Government Sustainable Development targets and other CDP policies. Given that the proposed development will not have any of the potential impacts set out in the foregoing paragraph, will contribute the Scottish Government Sustainable Development targets, and complies with all other relevant CDP policies as set out in this statement, it should be supported in accordance with the interim Supplementary Guidance.

Scottish Planning Policy (2014)

5.4 As a statement of Scottish Minister's priorities, SPP is a material consideration that carries significant weight in determining planning applications, and requires to be given due consideration as such. Notably, SPP includes a presumption in favour of development that contributes to sustainable development, the application of which requires decisions to be guided by a number of principles, including (amongst other things) supporting climate change mitigation and adaptation.



- 5.5 This application clearly complies with that principle in that, by contributing to ensuring a stable supply of renewable energy, it will support climate change mitigation and adaptation. The application should therefore be supported in line with the principles of SPP.
- 5.6 More specifically, in relation to creating a low carbon place, SPP highlights the fact that NPF 3 is clear that planning must facilitate the transition to a low carbon economy, including the development of renewable energy technologies, and recognises that the efficient supply of low carbon and low cost heat and generation of heat and electricity from renewable energy sources are vital to reducing green house gas emissions. As such, SPP states that the planning system should support transformational change to a low carbon economy, subject to addressing certain criteria, which are the same as those set out in the Council's SG5: Resource Management and addressed in paragraph 4.18 above. As the proposed development satisfies these criteria for the reasons given above, application should therefore be supported in accordance with SPP.

Draft Advice on Net Economic Benefit and Planning

5.7 Scottish Government Draft Advice on Net Economic Benefit and Planning (2016) also stresses the importance of planning decisions giving due weight to net economic benefit, with the Draft Advice stating that the level of detail required to demonstrate that should be proportionate to the likely scale of such benefit. In this case, the scale of the development is such that it would be unreasonable to require a full net economic benefit analysis. However, as highlighted above, as an enabling technology that will ultimately save customers money (including through storing low cost energy and releasing it at peak periods, and avoiding costly disruptions), improve reliability and resilience (again avoiding costs of any outages) and integrate diverse resources (smoothing the delivery of energy from variable and intermittent resources) there will be a positive economic benefit, with additional economic benefits arising from construction of the facility and within the supply chain. The Draft Advice therefore requires that this be given due weight in support of the application accordingly.

6 Conclusion

- 6.1 For the reasons given in this statement, it can be seen that the development:
 - complies with the Glasgow City Development Plan (2017) (LDP), with this being consistent with the City Profile, Strategic Approach and relevant policies, namely Policies CDP 1, CDP 2, CDP 3, CDP 5 and CDP 11, together with associated Supplementary Guidance (SG); and

- is also supported by relevant material considerations, namely the Council's Interim Planning Guidance IPG3 Economic Development, Scottish Planning Policy, and Scottish Government Draft Advice on Net Economic Benefit and Planning.
- 6.2 Specifically, the development:
 - is consistent with the site's existing use;
 - will not have any negative impact on existing business on the industrial estate or on the amenity of residents in the surrounding area;
 - will provide a clean and stable source of renewable energy; and
 - deliver net economic benefits.
- 6.3 As the development complies with the Development Plan and is supported by relevant material considerations, with no material considerations indicating otherwise, the application should be approved.
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Aurora Planning Limited
11 March 2022