



E: James.McKenzie@gov.scot

Simon Munro
Logan PM Ltd
Inverlair Farm
Tulloch
Roy Bridge

By email to: simon@loganpm.co.uk

Our ref: ECU00003393
27 May 2022

Dear Simon Munro

ELECTRICITY ACT 1989

THE ELECTRICITY WORKS (ENVIRONMENTAL IMPACT ASSESSMENT) (SCOTLAND) REGULATIONS 2017 (AS AMENDED)

SCREENING OPINION OF THE SCOTTISH MINISTERS IN RESPECT OF A PROPOSED APPLICATION FOR CONSENT UNDER SECTION 36 OF THE ELECTRICITY ACT 1989 TO CONSTRUCT AND OPERATE THE ELECTRICITY GENERATION STATION INCLUDING BATTERY ENERGY STORAGE FACILITY, KNOWN AS WHITEHILL ENERGY STORAGE, AT WHITEHILL FARM IN THE PLANNING AUTHORITY AREAS OF NORTH LANARKSHIRE COUNCIL AND GLASGOW CITY COUNCIL

Thank you for your request dated 14 December 2021 requesting, on behalf of Whitehill Battery Storage Limited (“the Company”), a screening opinion in respect of an application under section 36 of the Electricity Act 1989 (“the Electricity Act”) to construct the above Development exceeding 50 megawatt (MW) installed capacity.

The proposed development comprises a Battery Energy Storage System (BESS) with installed capacity around 200 MW and associated access and infrastructure (“the Development”) located on farmland, part of Whitehill Farm, just south of the town of Gartcosh, lying in a strip between the busy A752 road and the M73 motorway, within the planning authority areas of Glasgow City Council and North Lanarkshire Council (“the Planning Authorities”).

The Development will consist of an array of battery storage equipment comprising batteries, power converters, transformers and local switches in metal housings. A transmission compound comprising high voltage switchgear, transformer and control building, surrounded by a steel palisade fence. A control building, expected to be a flat roofed building of around 4 metres height is also included. Ancillary development would include turning area, parking, two water tanks of around 6 metres height, pump house, and stores of around 4 metres high, with landscaping and a sustainable drainage system. Structures on site would be up to 10 metres high.



The proposal requires to be screened by the Scottish Ministers in accordance with regulation 7 of the Electricity Works (Environmental Impact Assessment) (Scotland) Regulations 2017 (as amended) (“the Regulations”). Following a request for a screening opinion made under regulation 8(1), Scottish Ministers are required to adopt an opinion on whether the Development is or is not EIA development.

The screening application letter was accompanied by supporting documentation which included a Site Layout map, details of the Development and surroundings with a review of the environmental baseline and assessment of effects including Visual Impact; Historic Environment and Archaeology; Ecology and Ornithology; Noise; Transport, Road Safety and Access; Safety; Waste Production; Flood Risk and Drainage; Geology and Ground Conditions including Coal Mining; and, Land Use and Soils.

The Electricity Works (Environmental Impact Assessment)(Scotland) Regulations 2017

The regulations set out at 8(2) the information that must accompany a request to the Scottish Ministers to adopt a screening opinion. Regulation 10 requires that the Scottish Ministers must seek that information if it is not included within the application documentation. Scottish Ministers consider the information included in the application letter and supporting documents is sufficient to meet the requirements set out in regulation 8(2), and that the submitted information has been compiled taking into account the selection criteria in schedule 3 of the regulations.

Statutory Consultation

Under regulation 8(5) of the regulations, Scottish Ministers are required to consult the planning authority within whose land the proposed application is situated. The planning authorities were consulted and North Lanarkshire Council responded on 2 May 2022 advising that, in their view, the proposed development does not constitute EIA development. A copy of this planning authority’s response is annexed to this screening opinion (**Annex A**). Glasgow City Council did not respond to the consultation or reminders that were sent.

In its response, North Lanarkshire Council highlighted that the Development would be located on Greenbelt land and that planning authority support for such a development may not be forthcoming. It advised that a Landscape Impact Assessment should accompany the application.

Scottish Ministers’ Considerations

EIA development is defined in the regulations, in respect of an application, as a proposed development which is either Schedule 1 development, or Schedule 2 development likely to have significant effects on the environment by virtue of factors such as its nature, size or location.

The proposed development constitutes Schedule 2 development in terms of the regulations.

In adopting a screening opinion as to whether Schedule 2 development is EIA development, the Scottish Ministers must in all cases take into account such of the selection criteria in Schedule 3 of the regulations as are relevant to the proposed development, and the available results of any relevant assessment.

Scottish Ministers have taken the selection criteria in Schedule 3 and all of the information submitted in respect of the screening request into account, and have taken account of the views of the planning authority. Scottish Ministers agree with the planning authority's view, and adopt the opinion that **the proposal does not constitute EIA development and that any application submitted for this development does not require to be accompanied by an EIA report.**

In accordance with regulation 7(2), this opinion is accompanied by the following written statement with reference to the relevant selection criteria within Schedule 3 of the regulations. In accordance with the regulations, a copy of the screening opinion has been sent to the planning authority.

Any future application submitted for the proposed development must be accompanied by sufficient information and supporting documentation to allow Scottish Ministers and consultees to fully assess the application, and to allow Scottish Ministers to reach a determination. The supporting information shall include, but not be limited to; an Environmental Appraisal assessing the effects of the proposed development on all the relevant environmental matters set out in the applicant's screening request dated 14 December 2021; information as outlined within the consultation response from North Lanarkshire Council, an assessment of the area for private water supplies and details of any proposed mitigation measures.

Written Statement

Characteristics of Development

In overview, the Development is of a battery energy storage facility and synchronous condenser and is comprised of the construction and/or operation of the following key components:

- The Development will be sited within an area of 12 hectares;
- Multiple containerised lithium-ion battery storage units with a capacity around 200 MW up to 4 metres high;
- Transmission compound enclosing equipment up to 10 m high with steel pallisade fence;
- Control building around 4 m high;
- Turning area;
- Parking;
- Two water tanks of around 6 metres height;
- Pump house;
- Stores of around 4 metres high;
- Landscaping;
- Sustainable drainage system.

The site would include equipment on concrete foundations. An underground cable will connect the Development to the adjacent substation. The site would be accessed via a new entrance from the adjacent A752 road. A new access is proposed at the south of the site and use may be made of the existing farm access at the north of the site.

There will be noise arising from both construction and operation of the Development. Operational noise emissions will result from the required cooling equipment, inverters and transformers. A noise assessment is to be provided with the application.

Location of Development

The existing land use is described as grazing for cows. The land has been allocated as Greenbelt and is currently open arable / pastoral farmland. The development spans approximately 12 hectares. The proposed equipment would lie around 200 metres from Whitehill Farm itself and around 300 metres from the next nearest houses at Whitehill Terrace to the north, around 400 metres from Kingshill Cottages to the north east, around 450 metres from Woodend Farm to the east, and around 700 metres from Lochwood Farm to the south west, and Lochend Cottages to the south east.

The surrounding area is a series of small low hills amongst lower, originally boggy ground, much of which has been drained for agriculture and development and the local pattern of development often follows the higher rather than lower ground. The application site is within the Seven Lochs Wetland Park.

The visual impact would be significant given that the development is of a large scale and in greenbelt land.

Ordnance Survey mapping from 1859 shows the Whitehill Farm stone buildings in their current arrangement and the land as fields, though at that time the public road ran through the farmyard having been realigned between 1910 and 1935. The town of Gartcosh is not yet present on the 1859 mapping and can be seen to be developing from the 1897 map.

A monitored topsoil strip was carried out between 9 October 2007 and 23 January 2008, on parts of the proposed route of electricity cables running from Easterhouse Grid substation to Gartcosh Business Park and on boreholes to the north and south of the railway line. The monitored excavation uncovered demolition debris from the former Gartcosh Steel Works (NS76NW 17) in the borehole to the north of the railway line. No other archaeological remains were recorded.

Neolithic chert and flint tools, a total of over 700 artefacts, were found by the north shore of Woodend Loch south east of Woodend Farm and around 600 metres east of the site, around 1951. A dugout canoe was apparently found during construction of Gartcosh House around 1892. This is around 150 metres north of the north end of the site area. A former colliery shaft, Bishop No. 3 Mine, is present around 500 metres south of the site. Woodend Loch was for a period used as a reservoir supplying the Monklands Canal.

War Memorial Cottage on Lochend Road, Gartcosh is a C-listed house around 700 metres from the site. Gartloch Cottages (numbers 2270 to 2288 Gartloch Road) is a B-listed terrace around 1km west of the site. The former Gartloch Hospital includes a number of A-listed former asylum buildings and is around 1km west of the site. The developer stated there is no significant inter-visibility between the development and these sites. No other significant records were identified. There would be no impact on these elements from the proposed development. It is not considered that this development has significant potential to cause adverse impact on cultural heritage features.

Woodend Loch, across the A752 road from the site, is a Site of Scientific Interest, designated for providing one of the best examples within central Scotland of a base rich loch with well-developed littoral (shore) vegetation. This site is one of a group of base-rich lochs to the north-east of Glasgow. The project is not considered to have potential for significant adverse impact on this designation. Woodend Loch forms part of a Country Park that extends to the south. Areas of Local Nature Reserve lie around a kilometre to the north east around the former steelworks.

Bishop Loch, around 1km to the west of the site, is a Site of Scientific Interest, designated for being one of the best examples in central Scotland of a base-rich loch and is one of a group of base-rich lochs to the north-east of Glasgow. The project is not considered to have potential for significant adverse impact on this designation.

There are no international designations in relation to ecology within 10 km of the site. The applicant will undertake an ecology survey and assessment to support any application for consent.

It is noted there is a core path adjacent to the site boundary used by pedestrians and cyclists.

Characteristics of the Potential Impact

Scottish Ministers agree with the planning authority on the characteristics of the potential impact.

In terms of the characteristics of the development, the proposed Development is relatively large in scale and land area. The site area is circa 12 hectares, and it is noted from the submitted information that the land is primarily agricultural land within designated greenbelt. Landscape and visual impact of the development is likely to be a significant issue and the application should address the loss of greenbelt and provide a Landscape and Visual Impact Assessment.

Vehicular access to the site would likely be via a new access route from the A752. There will be increased traffic during construction of the Development, though given the temporary nature of the construction phase, no significant effects are anticipated.

There are several residential properties within 1km of the Site, with the closest residential property approximately 200m from the Site. Construction and construction traffic will increase noise levels. Operational noise will arise due to the required air-conditioning units to cool the equipment. Any noise arising from construction and operation of the Development will be subject to a Noise Assessment, the methods for which will be discussed with the planning authorities.

Construction traffic will include HGV movements bringing plant on site and other deliveries of construction materials etc. No significant effects are expected on the users of the core path, although the application should make clear whether the construction of the new access will have any effect on recreational access.

The developer states the facility will be designed, built and operated to all relevant safety standards; that the site will be designed to reduce the risk of a fire occurring, and were a fire to occur to reduce the risk of it spreading. The application for consent will include description of measures to minimise risk to an acceptable level. Scottish Ministers will consult the Scottish Fire and Rescue Service and the Health and Safety Executive among other consultees.

Some significant effects on the environment will occur and will need to be addressed by the application. In particular, the landscape and visual impacts on the greenbelt land. The application will also have to consider whether there are private water supplies that could be affected and propose mitigation where appropriate.

This screening opinion does not constitute pre-application advice, and is provided without prejudice to the assessment of any future application under section 36 of the Electricity Act 1989.

Yours sincerely

James McKenzie

A member of the staff of the Scottish Government

cc North Lanarkshire Council, Glasgow City Council



Our Ref: 22/00073/CNS
Your Ref:
Contact: Colin Bradley
Tel: 01236 632500
E-mail: Planningenquiry@northlan.gov.uk
Date: 29th April 2022



James McKenzie

Enterprise And Communities
Civic Centre
Windmillhill Street
Motherwell ML1 1AB
Planningenquiry@northlan.gov.uk

Dear Sir/Madam,

Planning Application Reference: 22/00073/CNS
Logan PM Energy Project Management - EIA Screening Request - Battery Energy Storage Facility
Whitehill Farm, Coatbridge Road, Gartcosh, North Lanarkshire, G69 8DT

I refer to your application received on 21 January 2022. We apologise for the delay in replying however due to a backlog in mail receipt and distribution due to recent IT issues our reply has been delayed.

Having reviewed the package of materials submitted, the Planning Service would seek to make the following comments;

- The proposal is for a 200 MW facility whilst the illustrative photographs within the submission only illustrates facilities up to 100 MW (possibly half the size?) therefore it not possible to provide a full response to the potential physical and visual impact based on the information submitted.
- Section 2.4 of the submission is ambiguous in that it states at the third paragraph that components would be under 4m high but at the 4th paragraph appears to state that some elements may be up to 10m high.

Additional Information

- Gartcosh and Glenboig are villages that are proposed for and currently subject to significant urban expansion of up to 3000 new houses of which approximately 800 have already been built. Transport Assessment or Transport Statement, (whichever relevant) will be required particularly in relation to the construction period - should the development be approved.
- The application site is within the Seven Lochs Wetland Park. I have attached a link to this website. <https://www.sevenlochs.org/> The site is identified as such in the proposed North Lanarkshire Proposed Modified Local Development Plan. The plan has been approved by the Planning Committee but has yet to be adopted due to ongoing correspondence to the Directorate of Planning and Environmental Appeals. with the Scottish Government

Having reviewed the information within the submission and the relevant Scottish Government regulations and guidance, it is the opinion of this planning service authority that an EIA shall not be required in this instance. – The development matches that specified in Category 3(a) (Energy Industry, Industrial Installations) of Schedule 2 of the Environmental Impact Assessment (Scotland) Regulations 2017 and exceeds the 0.5Ha threshold. Whilst the development will have no impact on sensitive sites the land has been allocated as Greenbelt in both the existing and emerging local plans.



The land has been allocated as Greenbelt and is currently open arable / pastoral farmland. The site is located adjacent to the M73 motorway and the A752 (Coatbridge Road) and would be very prominent from either of these well used roads due to the undulating topography of the proposed application site. It is considered that the introduction of such a large area of industrial style development would detract from the existing landscape to a very significant degree.

Previous applications with regards to this parcel of land have included a proposed agricultural building to be sited remote from the existing farm infrastructure (application reference 20/00739/FUL) which we asked the applicant to withdraw and resubmit an application locating the proposed agricultural building in closer proximity to the existing farm buildings etc. As such, should there be any future application for the development of the site in relation to a battery storage facility, a Landscape Impact Assessment would be required to accompany the application.

It is acknowledged that the site currently hosts some infrastructure by way of mobile telephone mast and gas infrastructure, however this is relatively small in scale when compared to this proposal.

It is further noted that the accompanying report “the majority of the site is expected to be below 4 m in height” (although some elements may be greater in height) and that the development footprint is over an area of 12 Ha. It is therefore considered that the scale and massing of such a development would have a very significant and detrimental impact to the landscape value in this immediate vicinity.

The industrialisation of the greenbelt to the extent proposed is considered at this stage to be likely to be contrary to existing local plan policy NBE 3 Assessing Development in the Green Belt – see link to existing adopted Local Plan <https://maps.northlanarkshire.gov.uk/public/oldp/> and Supplementary Planning Guidance SPG07 <https://www.northlanarkshire.gov.uk/planning-and-building/planning-applications/our-supplementary-planning-guidance>. The proposed modified plan maintains the greenbelt designation <https://www.northlanarkshire.gov.uk/planning-and-building/development-plans/north-lanarkshire-local-development-plan>

Where North Lanarkshire Council are not averse to accommodating developments for battery energy storage, as evidence by application reference 17/01142/FUL for the “Construction and Operation of a Containerised Electricity Storage Facility” and application 18/00654/FUL for the “Reserve Power Generation Facility Comprising Custom Designed Shipping Containers”, it should be noted that these developments are located within an industrial setting and not in the countryside. It is also noted that the scale of these approved applications is significantly smaller with the compound measuring 0.28Ha and comprising 10 custom designed shipping containers.

As such planning authority support for such a development may not be forthcoming. Due to the size of the application site the determination would require to be made by the Planning Committee of NLC

I trust this clarifies matters, however should you have any further queries please contact Colin Bradley, on the above number.

Yours faithfully,

Lorna Bowden
Planning and Place Manager