

High Mathernock Inverclyde Battery Energy Storage System:

Planning Statement Addendum

January 2026

prepared for **Harmony HM Limited**

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1. Introduction

1.1 Background

- 1.1.1 This Planning Statement Update has been prepared by David Bell Planning Ltd ('DBP') on behalf of Harmony HM Limited ('the Applicant') to support the submission of additional information and a revised layout for an application under section 36 of the Electricity Act 1989 ('the 1989 Act') in December 2024, for consent to construct and operate a battery energy storage system ('BESS') with associated access, landscaping and ancillary ('the Proposed Development') on a site known as High Mathernock, located north-west of Kilmacolm, Inverclyde. The Energy Consents Unit ('ECU') reference number is: ECU00005083.
- 1.1.2 The application was submitted in December 2024 and was screened negatively for Environmental Impact Assessment ('EIA') under the provisions of the Town and Country Planning Environmental Impact Assessment (EIA) (Scotland) Regulations 2017 ('the EIA Regulations'). The Applicant submitted a number of supporting technical and environmental appraisals in support of the section 36 application.
- 1.1.3 Following issue of the Council's draft Report to Board, in August 2025, the Applicant took the decision to seek an extension of time in order to take further advice and guidance on landscape and visual matters and to provide further clarity on the benefits of the Proposed Development. As a result, a change to the overall design and layout of the Proposed Development has been undertaken. To support the submission of the redesign, Additional Information ('AI') has been prepared which responds to the issues raised on landscape and visual matters within the Council Officer's Report. Amendments to the Proposed Development have resulted in the revised design as now submitted.
- 1.1.4 The Planning Statement for the Proposed Development which was completed in December 2024 contained a detailed appraisal of the proposal against the provisions of National Planning Framework 4 ('NPF4') and the Council's Local Development Plan ('LDP') and climate change and energy policy considerations. This Planning Statement Update is supplementary to that document and does not repeat the past policy submissions, in particular those relating to NPF4 which still remain valid. However, it considers the proposal against the lead NPF4 policies and also the current energy, climate change and planning policy framework. An update is therefore provided in relation to the key legislative renewable energy, emissions reduction and planning policy matters which have emerged since December 2024 in order that the latest position is before the Council.
- 1.1.5 In addition to the submission of the replacement drawings reflecting the revised design and layout, and the AI Report (Landscape and Visual 2026), an update to the following supporting information as submitted in December 2024 is provided:
- > Air Quality Impact Assessment;
 - > Archaeological Desk-Based Assessment;
 - > Sustainable Drainage & Flood Risk Assessment;
 - > Ecological Desk Study;
 - > Breeding Bird Survey Report;
 - > Protected Species Survey Report;
 - > National Vegetation Classification Survey Report;
 - > Outline Construction Environmental Management Plan;
 - > Inc Species Protection Plan;
 - > Outline Biodiversity Enhancement Management Plan;

- > Geology, Soils and Groundworks Strategy Report;
- > Landscape and Visual Impact Assessment;
- > Environmental Noise Impact Assessment;
- > Transport Statement & Construction Traffic Management Plan;
- > Outline Battery Safety Management Plan; and
- > Updated Economic Impact Note.

1.2 Site Location and Description

- 1.2.1 The application site is located north-west of Kilmalcolm, Inverclyde, with central grid references of NS 32087 71420.
- 1.2.2 The site is within the green belt and is in current use as farmland, south of Auchentiber Road, which connects the B788 to the west and Auchenbothie Road in the east. The site slopes gently downwards north to south. The built footprint has reduced in size from 3.1 hectares ('ha') in area to 2.7 ha and is located within and comprises entirely of an improved grassland field used for grazing cattle. The wider area is rural in character, with scattered farm properties. The rural area has rolling topography and is characterised by some woodland and similar grassland habitats, although the east and north-east habitats comprise scrub, heathland.

1.3 Inverclyde Officer Report and Applicant Response

- 1.3.1 The Report to Board (August 2025) acknowledged that the proposals were consistent with the terms of Policy 11 c) of NPF4 and noted that the development is designed to support the flexible operation of the National Grid and the decarbonisation of electricity supply. The effects of the Proposed Development in isolation, including landscape and visual, were assessed to be in accordance with the Development Plan.
- 1.3.2 Cumulatively the Officer raised concerns as to scale, and effects, in landscape character and visual terms, beyond what was considered a localised effect, and as such it was considered to fall contrary to the provisions of NPF4. No other significant effects were identified such that any further level of non-accordance with the Development Plan was identified.
- 1.3.3 Overall, the cumulative effects on landscape impact were considered unacceptable, notwithstanding the *“significant benefits the proposal will bring in terms of net economic benefit and contributing to energy storage”*. The effects were assessed such that *“The cumulative landscape impacts extend beyond a local impact to an impact on intermediate landscape”*. Further the Report states that *“Overall the benefits of the proposed development are not considered to outweigh the adverse impacts. The proposal is therefore considered unacceptable when assessed against the relevant policies of National Planning Framework 4, the adopted Inverclyde Local Development Plan as well as the proposed Inverclyde Local Development Plan”*.
- 1.3.4 A more detailed summary of the key landscape and visual issues arising within the Inverclyde Council draft Report to Board (dated 6 August 2025) is provided in Chapter 2 of the AI Report. In summary the Officer concluded that *“The combined effect of the BESS, electricity infrastructure and other renewable developments fragments the rural nature of the landscape and the local and intermediate landscape is altered to a degree considered to constitute a negative change to the landscape character”*.
- 1.3.5 LUC have undertaken a review of Landscape and Visual matters, and the AI Report addresses the issues raised in the Officer Report and demonstrates the localised nature of the landscape and visual effects in isolation and cumulatively alongside other relevant consented and proposed developments.

- 1.3.6 In addition, the revised layout responds to advice arising from the landscape and visual review and also reflects a change in circumstance in substation / connection provision (change in rating from 132 kV to 400 kV within the Site removing the need for a second collector station out with Site within local area). The layout has been optimised and specific landscape advice has been provided by LUC in order to ensure that the Proposed Development is successfully sited in the landscape and that the landscape and visual effects arising remain localised.
- 1.3.7 In addition, an updated Economic Impact Note has been prepared which sets out in more detail the benefits arising from the Proposed Development to further inform the planning balance overall.

1.4 The Revised Development

1.4.1 A review of the Proposed Development's design and layout has been undertaken in response to the Officer Report and to reflect a change in grid connection requirements by Scottish Power Transmission, along with changing infrastructure technology.

1.4.2 The key changes within the Revised Development are summarised below:

- > Reduction in site area from 3.1 ha to 2.7 ha;
- > Reduction in number of battery units from 87 to 60;
- > Reduction in surface area for energy storage compounds from 1.95 ha to 1.13 ha;
- > Electricity transmission rating changed from 132 kV to 400 kV;
- > Substation area within the Site increased from 0.18 ha to 0.52 ha to facilitate rating change;
- > Access roads widened from 4 m to 6 m;
- > Sustainable Urban Drainage System ('SUDS') attenuation pond size increased from 0.18 ha to 0.24 ha;
- > Changes to the cut and fill profile of main development platform including reprofiling of embankments to better integrate landform into existing topography;
- > Retaining wall length reduced from 275 m to 255 m;
- > Woodland planting extended across shallowed embankments within the Site to more effectively screen and reduce visual impact;
- > Woodland planting area increased from 2.27 ha to 2.92 ha;
- > Position of species rich hedgerow altered to avoid interference with access visibility splays; and
- > Reinstatement / enhancement of existing hedgerows along southern boundary of Site, and stone dyke along Auchentiber Road.

1.5 Structure of Planning Statement

1.5.1 This Planning Statement Update is structured as follows:

- > **Chapter 2** sets out the up-to-date position with regard to the renewable energy policy and emission reduction legislative framework;
- > **Chapter 3** provides an update on the assessment of the revised design against Development Plan policy matters with regard to landscape and visual and economic benefits in particular; and

- > **Chapter 4** presents overall conclusions.

2. The Renewable Energy Policy & Legislative Framework: Update

2.1 Introduction

2.1.1 The Planning Statement of December 2024 provided a detailed position in relation to the renewable energy policy and emissions reduction legislative framework with reference to relevant international, UK and Scottish provisions. The framework of international agreements and obligations, legally binding targets and climate change global advisory reports is the foundation upon which national energy policy and greenhouse gas emissions ('GHG') reduction law is based. This underpins what can be termed the need case for renewable energy from which the proposed development can draw a high level of support.

2.1.2 UK and Scottish Government renewable energy policy and associated renewable energy and electricity targets are important considerations. It is important to be clear on the current position as it is a fast-moving topic of public policy. Reference is made to key UK level statutory and policy provisions and then a description of relevant Scottish Government statutory and policy provisions. Key updates include the following which are referred to throughout the chapter:

- > At the International level:
 - UN Emissions Gap Report 2025.
- > At the UK Government level;
 - The Seventh Carbon Budget (2025).
- > At the Scottish Government level:
 - The Climate Change Committee ('CCC') Report, Scotland's Carbon Budgets, Advice for the Scottish Government (2025);
 - The draft Scottish Climate Change Plan 2025.

2.2 The International Context

UN Emissions Gap Report (2025)

2.2.1 The UN Emissions Gap Report (November 2025) entitled "Off Target" provides the annual independent science-based assessment of the gap between the pledged GHG reductions, and the reductions required to align with the long-term temperature goal of the Paris Agreement.

2.2.2 The Executive Summary Report comments on the background of GHG emission increases and the new Nationally Determined Contributions ('NDCs') submitted ahead of COP30 in Brazil as follows (page 4):

"As this sixteenth Emissions Gap Report shows, the new NDCs have limited effect on narrowing the emissions gap by 2030 and 2035, leaving global warming projections well above the Paris Agreement's temperature goal. New scenarios show that limiting warming to 1.5°C by 2100 remains technically possible. However, due to the continued delay in deep emission cuts, 1.5°C pathways now imply higher and higher temporary exceedance of this temperature target. The magnitude and duration of this overshoot must be limited as much as possible. Each year of delayed action locks in carbon intensive infrastructure results in greater losses for people and ecosystems, higher adaptation costs and a heavier reliance of costly and uncertain carbon dioxide removal. Each year of inaction makes the path to net zero by 2050 and net negative emissions thereafter steeper, more expensive and more disruptive."

- 2.2.3 Section 7 of the Executive Summary sets out that “*despite the increasing likelihood of higher and longer temperature overshoot, pursuing efforts to limit global warming to 1.5°C remains as critical and relevant as ever*”.
- 2.2.4 The report adds: “*accelerated mitigation action provides benefits and opportunities. In many cases, mitigation aligns with economic growth, job creation, energy security and achievement of other pressing development needs and the sustainable development goals. The required technologies are available, and wind and solar energy development continue to exceed expectations, lowering deployment costs and driving market expansion. Yet deployment remains insufficient, and accelerated emission reductions require overcoming policy, governance, institutional and technical barriers.....*”
- 2.2.5 The latest Gap Report is expressly clear that the international position in relation to combating climate change is worsening. The conclusions also make clear that deployment of renewable energy, including battery storage, remains key to combating the climate emergency.

2.3 UK Climate Change & Energy Legislation Policy

The Climate Change Act 2008 & Carbon Budgets

- 2.3.1 The Climate Change Act 2008 (‘the 2008 Act’) provides a system of carbon budgeting. Under the 2008 Act, the UK is now committed to a net reduction in GHG emissions of 100% against the 1990 baseline by 2050, with Scotland committing to net zero by 2045.
- 2.3.2 The 2008 Act also established the CCC which advises the UK Government on emissions targets, and reports to Parliament on progress made in reducing GHG emissions.
- 2.3.3 The CCC has produced seven, four yearly carbon budgets, covering 2008 – 2042. These carbon budgets represent a progressive limitation on the total quantity of GHG emissions to be emitted over the five-year period as summarised in **Table 2.1** below. Essentially, they are five yearly caps on emissions.
- 2.3.4 These legally binding ‘carbon budgets’ act as stepping-stones toward the 2050 target. The CCC advises on the appropriate level of each carbon budget and once accepted by Government, the respective budgets are legislated by Parliament.

Table 2.1: Carbon Budgets and Progress¹

Budget	Carbon budget level	Target Reduction below 1990 levels	Progress on Budgetary Period (reduction amount v Target)
1 st carbon budget (2008 – 2012)	3,018 MtCO _{2e}	26%	-27%
2 nd carbon budget (2013 – 2017)	2,782 MtCO _{2e}	32%	-42%
3 rd carbon budget (2018 – 2022)	2,544 MtCO _{2e}	38% by 2020	-50% ²
4 th carbon budget (2023 – 2027)	1,950 MtCO _{2e}	52% by 2025	n/a
5 th carbon budget (2028 – 2032)	1,725 MtCO _{2e}	57% by 2030	n/a
6 th carbon budget (2033 – 2037)	965 MtCO _{2e}	78% by 2035	n/a
7 th carbon budget (2038 – 2042)	535 MtCO _{2e}	87% by 2042	n/a

¹ Source: Climate Change Committee (CCC).

² Confirmed by CCC in ‘Final Statement for the Third Carbon Budget’ May 2024. By the end of the period in 2022, UK net GHG emissions were 50% lower than the base year emissions.

Net Zero Target	100%	By 2050	
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2.3.5 The Seventh Carbon Budget ('CB7') was published by the CCC in February 2025. The CCC's recommended level for CB7, namely a limit on the UK's GHG emissions over the five-year period 2038 to 2042 is 535 MtCO_{2e} including emissions from international aviation and shipping.

2.3.6 Page 12 of the CB7 states:

“By the middle of the Seventh Carbon Budget on our pathway, emissions in the UK will be only a quarter of the level they are today, and 80% lower than levels in 1990 (90% lower excluding emissions from international aviation and shipping.) Achieving this will require a significant reduction in emissions across sectors including surface transport, buildings, industry and agriculture.”

2.3.7 It sets out (page 12) that achieving CB7 will mean that UK based renewable energy provides the bulk of generation and this will replace oil and gas across most of the economy. It adds that *“this requires twice as much electricity as today by 2040”*.

2.3.8 In relation to Grid Storage, CB7 sets out (page 209/210) that the Balanced Pathway uses storable energy as the primary complement to variable renewables, including fuels such as gas, hydrogen, nuclear and bioenergy that can be used in low-carbon ways and grid storage such as batteries. Grid storage can capture energy typically when it's cheap to provide electricity in periods when demand is higher and electricity is more valuable.

“batteries can provide flexibility by discharging power on timescales from seconds-to-hours. The Balanced Pathway deploys 35 GW of short-duration batteries (up to 9 hours) by 2050, more than a ten-fold increase on 2023 levels”. In addition, CB7 analysis deploys 7 GW of medium-duration grid storage by 2050.

2.4 Climate Change & Renewable Energy Policy: Scotland

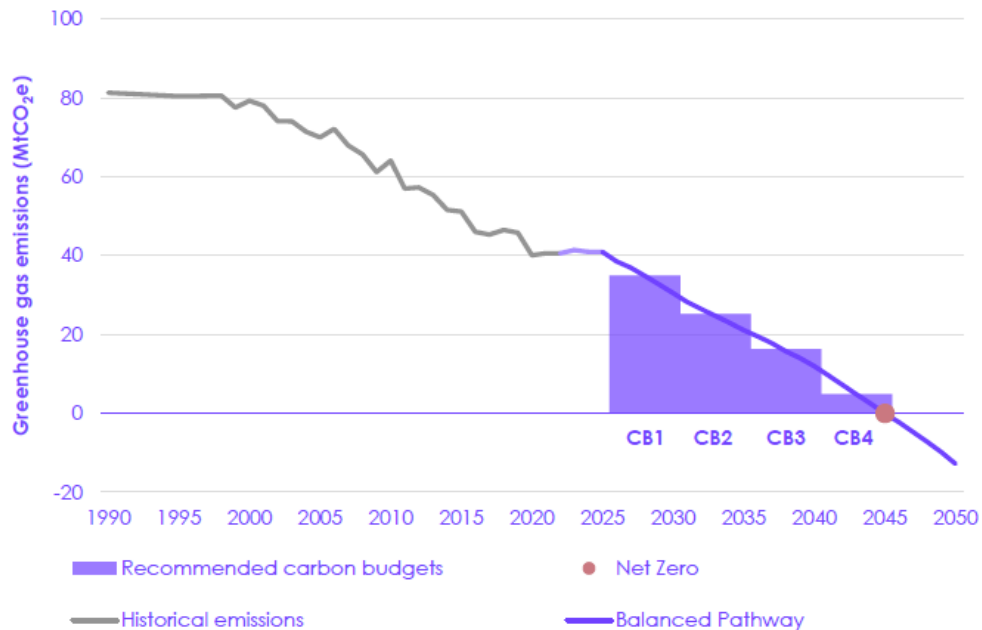
CCC Report, Scotland's Carbon Budgets, Advice for the Scottish Government (May 2025)

2.4.1 The Report sets out the CCC's advice on the level of Scotland's four proposed carbon budgets, covering the period 2026 to 2045. It recommends that the Scottish Government sets its carbon budgets, at annual average levels of emissions that are:

- > 57% lower than 1990 levels for the First Carbon Budget (2026 to 2030);
- > 69% lower than 1990 levels for the Second Carbon Budget (2031 to 2035);
- > 80% lower than 1990 levels for the Third Carbon Budget (2036 to 2040); and
- > 94% lower than 1990 levels for the Fourth Carbon Budget (2041 to 2045).

2.4.2 The recommended carbon budgets are illustrated in **Figure 2.1** below.

Figure 2.1: CCC Recommended Carbon Budgets for Scotland³



2.4.3 The report sets out that the CCC’s advice “shows that the proposed carbon budgets are deliverable and Scotland can achieve its 2045 Net Zero target.” (page 8)

2.4.4 It states that getting to net zero by 2045 will require immediate action, at pace and scale and adds that decisions on the exact pathway and policies are for the Scottish Government.

2.4.5 The Report explains that progress to date has largely come from electricity decarbonisation, reflecting Scotland’s abundant renewable resources. It goes on to state (page 9) that:

“Action will increasingly be required in predominantly devolved policy areas to hit the Net Zero 2045 target and the proposed carbon budgets. Now that the framework for climate action has been reset, the Scottish Government has the opportunity to use its powers to match its ambitions with action.”

2.4.6 The Report identifies priority actions, which over the period of the first two carbon budgets will be the remaining decarbonisation of electricity generation as well as further electrification of key technologies, particularly the roll-out of EVs and heat pumps.

2.4.7 The Report identifies the sources of future emissions reductions and notes that in the next decade, over the next two carbon budgets, they are predominantly met from electrification of key technologies across the economy and measures to reduce demand for high-carbon activities.

2.4.8 Specifically in relation to electricity and low carbon supply the Executive Summary explains (page 12) that in the Balanced Pathway set out by the CCC:

“the capacity of variable renewables in Scotland (including offshore and onshore wind and solar) more than triples from 15 GW in 2023 to 49 GW by 2035, increasing to 66 GW by 2045. This provides 98% of electricity generation in Scotland in 2035 and caters for increasing demand in Scotland and the rest of Great Britain (GB). Grid storage, use of storable fuels on the GB-wide network, and smart demand flexibility ensure a reliable supply of electricity even in adverse weather years. These technologies need to be accompanied by rapidly expanding the transmission grid, upgrading the distribution network, and speeding up the grid connection

³ Source: CCC (May 2025). The Report states that the ‘Balanced pathway’ sets the recommended level of Scotland’s carbon budgets.

process. To deliver clean electricity, the planning process to approve large electricity infrastructure projects in Scotland needs to be urgently improved. (emphasis added)

- 2.4.9 Scotland currently has approximately 17.6 GW⁴ of renewables operating capacity, therefore, to achieve the Balanced Pathway figure of 66 GW by 2045 will require an additional 48.4 GW to be deployed.
- 2.4.10 The Report sets out in more detail the key actions to deliver the Balanced Pathway in electricity supply. At page 94 it refers to the key action for the Scottish Government which is to *“Urgently improve the planning process to approve large electricity infrastructure projects in Scotland, such as transmission lines and onshore wind farms.”* citing that it can currently take up to four years to approve large electricity infrastructure projects in Scotland.
- 2.4.11 The Report makes reference to the Scottish Government and the UK Government’s commitment to reform the energy consents system in Scotland, including through measures in the Planning and Infrastructure Bill. It states that *“Both governments should ensure that these reforms are now implemented at pace. All bodies involved in the planning and consenting process must also be adequately resourced and skilled.”*

2.5 Scotland’s Draft Climate Change Plan (2025)

- 2.5.1 The Scottish Government published ‘Scotland’s Climate Change Plan – 2026-2040’ (‘draft CCP’) on 6th November 2025. The Plan covers the period 2026 to 2040 and aligns with three five-year “carbon budget” periods: 2026-30, 2031-35 and 2036-40. The draft CCP sets out the policies and proposals the Scottish Government will take forward to enable the carbon budgets set out in legislation to be met. The carbon budgets have been set in line with the levels proposed by the CCC in May 2025, referred to above, and provide a clear pathway towards Scotland achieving net zero by 2045.
- 2.5.2 The draft CCP confirms that Scotland remains committed to achieving net zero GHG emissions by 2045 at the latest and that as of 2023, Scotland had reduced emissions by 51.3% since 1990 — the largest reduction in the UK.
- 2.5.3 The Plan notes that the key driver of the transition to date has been the transformation in the way energy is generated - from coal and gas to a thriving renewables sector. In 2023, 70% of electricity generated in Scotland was from renewable sources.
- 2.5.4 It acknowledges the opportunity the transition to net zero provides in terms of growing the economy noting that the net zero transition can support significant economic opportunities for Scotland.
- 2.5.5 The Plan sets out average reductions in GHG emissions (compared to 1990 baseline) for each five-year period:
- > 57% lower than baseline levels for 2026-2030,
 - > 69% lower than baseline levels for 2031-2035,
 - > 80% lower than baseline levels for 2036-2040, and
 - > 94% lower than baseline levels for 2041-2045.
- 2.5.6 These budgets provide a “pathway” toward net zero by 2045, and the Plan is designed to ensure policies are in place to meet them.
- 2.5.7 The draft CCP sets out sectoral policies relating to a range of sectors, which are prescribed in legislation including energy supply; agriculture; and transport, amongst others. Key policies and actions have been set out for each sector to meet the carbon budgets. The draft CCP outlines the emissions pathway for each sector covered by the plan, some of the key actions

⁴ Source: Scottish Government (March 2025) Energy Statistics for Scotland – Q4 2024.

which will be taken to achieve it and the economic opportunities and benefits this action will support.

- 2.5.8 Annex 2 of the draft CCP contains the Sectoral Annexes which support the draft CCP. Energy supply is one of the key areas of focus. At page 70, the document sets out the vision for Scotland stating that:
- “By 2035, we will have expanded our renewable capacity significantly to meet the increasing demand as other sectors decarbonise. We already have an ambition to have delivered 20GW of onshore wind by 2030 and we have consulted on a proposed updated ambition for the development of up to 40GW of new offshore wind by 2040.”*
- 2.5.9 It continues that as we transition to net zero and reduce reliance on fossil fuel generation *“energy storage will play a larger role in ensuring a secure and resilient electricity system by providing a reliable and flexible electricity supply.”* (page 79)
- 2.5.10 One of the actions identified to achieve the vision of emissions reduction for the energy generation sector means *“moving to an electricity system in which the residual amount of unabated gas is displaced by low carbon and renewable sources. To deliver this target, whilst ensuring a safe and secure supply, we must grow our renewables capacity, including from offshore and onshore wind, and solar.”* (Page 83, Annex 2) (emphasis added)
- 2.5.11 The publication of the CCP demonstrates the continued commitment required and needs case for delivering additional renewable energy capacity to achieve net zero.
- 2.5.12 The draft CCP is currently out for consultation until 29 January 2026. Scottish Parliament committees also have until 5 March to scrutinise and report on the aspects of the Plan which fall under their remit.
- 2.5.13 The Scottish Government has committed to publishing its final Climate Change Plan before the dissolution of Parliament for the 2026 election.

2.6 Conclusions on the Renewable Energy Policy & Legislative Framework

- 2.6.1 It is considered that the Proposed Development is very strongly supported in both Scotland and the wider UK by climate change and renewable energy policy and legislative framework.
- 2.6.2 The trajectory, in terms of the scale and pace of action required to reduce emissions, grows ever steeper and it is essential that rapid progress is made, otherwise the legally binding target in Scotland of net zero by 2045 will not be met.
- 2.6.3 The change from annual Scottish emission reduction targets to a system of carbon budgets has served to show that Scotland is not on track to attain net zero, and it strengthens the case for rapidly approving schemes that can contribute to this goal. The overall target of Net Zero remains unchanged.
- 2.6.4 Decisions through the planning and wider consenting system must be responsive to this position. Decision makers can do this by affording substantial weight to the energy policy objectives articulated above, in the planning balance in a given case.
- 2.6.5 In terms of the energy policy considerations, it is helpful to reference the recent position of the Scottish Ministers with regard to a Section 36 BESS decision for Redshaw BESS south-east of Douglas (Ref: ECU00005122) (August 2025) which states at paragraph 55 and 56:

“Scottish Ministers have considered the role the proposed Development can play in relation to the generation of electricity from low carbon energy storage... The Energy Strategy states that “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”. It adds that “Scotland needs a balanced and secure electricity supply. That means a system and a range of technologies which provide sufficient generation

and interconnection to meet demand. It means an electricity network which is resilient and sufficiently secure against any fluctuations or interruptions to supply”.

The generation of electricity from batteries is not in itself a renewable source of energy and the electricity generation from the batteries will not contribute to national targets for production of electricity from renewable energy. Scottish Ministers do however regard the proposed Development as essential infrastructure. The proposed Development, through provision of energy storage, adds flexibility and resilience necessary to maintain secure and reliable supplies of energy to all our homes and businesses as our energy transition takes place. Scottish Ministers conclude that the proposed Development is supported by the Energy Strategy”.

- 2.6.6 A regard the Climate Change Plan, the same decision references clearly at paragraphs 59 that in further decarbonising the electricity system, there is a need to address the “*substantial challenges of maintaining security of supply and resilient electricity system. It add that operation a zero-carbon electricity system will mean finding new ways to provide a range of technical services and qualities currently provided by fossil fuel and nuclear generation. Battery storage is one technology which helps to achieve these goals. Scottish Ministers therefore conclude that the proposed Development is supported by the Climate Change Plan”.*
- 2.6.7 In the most recent renewable energy policy documents referred to, there is a consistent and what might be termed a ‘green thread’ which ties a number of related policy matters together: namely the urgent challenge and imperative of attaining and sustaining net zero and the need to substantially increase renewable capacity, notably onshore wind.
- 2.6.8 The climate change and energy policy related documents referred to in the Planning Statement of December 2024 and in this Planning Statement Update confirm the Scottish Government’s policy objectives and related targets, reaffirming the important role that renewable energy, including grid storage, will play in response to the climate crisis.
- 2.6.9 It must follow that the need case for the Proposed Development is to be afforded significant weight in the planning balance. The way that decision makers can do that is by properly recognising the seriousness and importance of energy policy related considerations in the planning balance. It is the cumulative effect of a large number of individual projects which will move Scotland towards where it needs to be in order to attain net zero.

3. Updated Policy Appraisal

3.1 Introduction

3.1.1 In this Chapter, updates are provided in relation the assessment of the Revised Development and effects against the Development Plan and clarification on matters arising from consultation responses are confirmed.

3.2 Key Responses to Officer Report

3.2.1 The Revised Development design has been progressed in response to key matters set out in the Officer Report to Board (August 2025) and these relate primarily to landscape and visual effects.

3.2.2 All other supporting documents have however been updated to reflect the updated design and layout. No changes to the significance of effects have been identified, including the effects on Scheduled Monuments within 2 km and this has been confirmed directly with Historic Environment Scotland ('HES') who have advised that they will maintain their position of no objection in light of the revised design.

3.2.3 As such, the update of these documents to reflect the updated design do not alter the planning assessment already set out within the Planning Statement (December 2024), and this should be relied upon.

3.2.4 In addition, a further examination of the expected socio - economic benefits arising as a result of the Revised Development has been completed, and this is reported in an update note prepared by BIGGAR economics and is relevant to consideration of the overall planning balance. A summary relevant to policy and the overall planning balance is provided below and within the conclusions of this report.

Landscape & Visual Issues

3.2.5 A review of the Report to Board sets out the Council's concerns related to cumulative landscape effects arising from the addition of the Proposed Development, alongside the consented Auchentiber BESS adjacent, and in combination with other transmission infrastructure and wind turbine development within the wider landscape.

3.2.6 Impacts on the Landscape Character Type ('LCT') would be contained within approximately 1 km and these are agreed as being localised per NPF4 Policy 11(e)(ii) (Energy) which recognises that significant landscape and visual impacts, are to be expected for some forms of renewable energy and transmission infrastructure, and where these are localised, and/or subject to appropriate design mitigation, they should generally be acceptable.

3.2.7 In response to the Council's drafted reasons for objection (May 2025), as explained, the Applicant revisited the design and has made a number of substantial changes to the scheme reducing the built footprint, minimising cut and fill earthworks and accommodating more woodland mitigation planting along with enhanced integration of elements of the Proposed Development. Whilst the substation area within the Site has increased and the tallest componentry of this has increased in height, the change negates the need for Scottish Power Transmission to introduce an additional collector station in the vicinity, off site, which will further reduce the potential cumulative development into the host landscape.

3.2.8 The Report to Board raised concern as to the cumulative effects of development and questioned the local and intermediate impacts in terms of landscape character and visual effects. The AI Report provides a review and update to the submitted LVIA and carries out an assessed of the revised design.

- 3.2.9 In terms of the landscape appraisal, moderate and above effects on landscape character are predicted from the upper extents of the Gryfe Water Valley, within a distance no greater than 1 km. This includes part of the host LCT and the adjacent LCT. As the proposed mitigation planting around the Site matures (note this is enhanced planting for the revised design, over and above the original submission and that proposed for the adjacent Auchentiber BESS) these effects will reduce. Even as a worst-case scenario, before landscape maturation, the effects are considered to be localised, being contained to the wester upper extents of the Gryfe Water Valley.
- 3.2.10 Visual effects have been reassessed and when considering the solus visual effects, moderate and above landscape and visual effects are predicted to arise. Visual effects of this nature are considered to be localised, experienced from a small area in the upper western extents of the Gryfe Water Valley. The scale and geographical extent of these visual effects are likely to be similar (probably slightly reduced given the smaller overall size) as solus visual effects associated within the consented Auchentiber BESS. The AI Report notes that it is important to consider these solus visual effects, as despite being granted, there is no certainty that the Auchentiber BESS will be constructed and become a landscape feature, as such the AI Report demonstrates that the design approach is appropriate in isolation, or as part of an integrated development with Auchentiber BESS in place.
- 3.2.11 As regards cumulative effects (a key consideration within the Report to Board) the AI Report focuses on cumulative interactions between the Proposed Development, and the adjacent (consented) Auchentiber BESS. There are other consented and proposed developments of a similar nature in the wider surrounding landscape, however these are of a distance that cumulative interactions are unlikely to be relevant to consenting.
- 3.2.12 A proportionate cumulative study area is considered to be circa 3-5 km radius and more detail thereof is provided in paragraph 5.35 of the AI Report.
- 3.2.13 The updated cumulative landscape appraisal concludes that assuming the adjacent much larger Auchentiber BESS is constructed and forms part of the future baseline cumulatively, the effects associated with BESS infrastructure, across a localised area of the host LCT and a small area of the adjacent LCT are only considered to slightly intensify. The geographical extent of these combined cumulative effects will be broadly similar to the geographical extent of effects associated within the Auchentiber BESS. As such, the cumulative effects arising from both schemes in combination will only slightly intensify the effects of BESS overall on the local landscape.
- 3.2.14 The updated cumulative visualisations also highlight that by clustering the Proposed Development and the consented Auchentiber BESS together, the additional visual effects associated with a BESS infrastructure in views will be concentrated in parts of the existing views already affected by views of the consented Auchentiber BESS, rather than affecting alternative views. The scale of cumulative change associated with the Proposed Development is not judged therefore to be considerably greater than the scale of change associated with the Proposed Development, considered in isolation. The AI Report notes that by clustering the developments together they may even read as one slightly larger BESS scheme in the view, and the compatible and complementary nature of the mitigation proposed further aides this perception. As such these visual effects will be more contained that visual effects associated with two more geographically separate BESS schemes.
- 3.2.15 Overall, both BESS schemes would typically be seen in the context of a landscape which has been influenced and altered by the presence of electricity infrastructure already (which would also be the case if only one of the BESS were to be implemented). The combined effects of both only marginally increases landscape and visual effects associated with BESS infrastructure in relation to the consented Auchentiber BESS (noting these effects have already been deemed acceptable via the granting of consent).
- 3.2.16 Additionally, the geographical extent of combined effects are not judged to be notably larger than those for Auchentiber in isolation. These effects will also reduce as landscape

mitigation matures. As such there is not considered to be additional cumulative effects associated with the Proposed Development such that the Proposed Development would fragment the landscape and result in effects which are wider than 'localised'.

Landscape Strategy Plan

- 3.2.17 An updated Landscape Strategy Plan has been submitted (Figure 5 of the AI Report). The mitigation measures seek to screen and integrate the Proposed Development whether it is developed in solus or cumulatively alongside the Auchentiber BESS. The strategy includes woodland planting, species rich hedgerow planting and wildflower planting. More extensive woodland planting is incorporated around the slopes of the main development platform, following reprofiling of the embankment slopes to better integrate the proposed landform changes into the existing slope. As woodland matures it will soften and screen views better integrating it to the landscape.
- 3.2.18 Colour of componentry and planting proposals have been carefully considered to help features recede into views, where visible. The proposals are also considered in light of proposals for the consented Auchentiber BESS to ensure integration into views together and indeed give the impression of integration together to be read as one single development should both progress to construction.
- 3.2.19 In additional landscape enhancement measures are proposed including reinstatement and enhancement of existing hedgerows and stone dykes around the Site boundary. This will help to restore and enhance key features which contribute positive to the rural agricultural landscape character of the LCT.
- 3.2.20 As such, it is considered that the Revised Development is in accordance with the provisions of NPF4 Policy 11 (e)(ii) with effects, where arising, being clearly quantified as localised (within 1 km), and cumulative effects clearly being assessed as no greater than those associated with the adjacent consented Auchentiber BESS. Landscape and design mitigation has been described and targeted such as to integrate the two BESS such that they are read effectively as one development within an already altered landscape baseline.

Economic Benefits

- 3.2.21 Following review of the Officers Report to Board, and in light of the revised design and changing requirement on Site, a revised Socio-Economic Report has been prepared. The Report now includes the level of domestic rates payable by the project and clearly sets out the socio-economic impacts of development – already accepted as beneficial – within the Officers Report (May 2025). These are material considerations and should be considered within the overall planning balance with particular regard to paragraph c) of NPF 4 Policy 11 which sets a requirement for socio-economic benefits to be maximised.
- 3.2.22 The following summary facts are relevant for High Mathernock BESS as part of HM Harmony Energy's investment:
- > Total UK Economic Impact of £83.8 million Gross Value Added ('GVA') and 800 years of employment, including 279 direct years of employment, from construction and development activity;
 - > Total Fiscal Contribution from direct jobs supported: £3.7 million (Construction and Development Activity);
 - > Annual UK Economic Impact of £5.1 million GVA and 29 jobs, including 10 direct jobs for operations and maintenance;
 - > Annual Fiscal Contribution of £1 million including £883,000 in Non-Domestic Rates each year from operations and maintenance activity;
 - > 100% project development activity assumed to be UK based;

3.3 Conclusions

3.3.1

Overall, the Applicant maintains the position that the Revised Design would be in accordance with all relevant policies of the statutory Development Plan and with the plan when read as a whole. The Revised Design gives rise to economic benefits. It would make a valuable and nationally important contribution to helping to meet net zero through grid balancing and storage of excess energy and with no greater than localised landscape and visual effects in isolation, and cumulatively.

4. Conclusions

4.1 The Electricity Act 1989

- 4.1.1 Paragraph 3 of Schedule 9 to the 1989 Act provides a specific statutory requirement on the Scottish Ministers to have regard to various matters when considering development proposals for consent under section 36 of the 1989 Act.
- 4.1.2 The information that is contained within the individual topic assessments submitted with the Application and updated now to reflect the revised design therefore enables Scottish Ministers to be satisfied that the obligations under Schedule 9 are met and that suitable mitigation has been identified. It is also considered that the detailed work undertaken in the formulation of these assessments has confirmed and provides confidence that the Proposed Development would be undertaken in an environmentally acceptable manner.

4.2 The Climate Crisis & Renewable Energy Policy Framework

- 4.2.1 The nationally important benefits of the Revised Development have been set out in the context of the current climate emergency. The Proposed Development would help address the issue of global heating and very challenging net zero targets and contribute to improving balancing and security of supply making a significant contribution with minimal environmental impact and making best use of existing infrastructure and containment within an existing energy cluster.

4.3 The Planning Balance

The Climate Crisis & Renewable Energy Policy Framework

- 4.3.1 Achieving net zero is a legal requirement, and the Scottish Government has recognised the role of BESS in achieving net zero as part of the renewable portfolio required to contribute to decarbonisation of electricity.
- 4.3.2 The CCC has stated (2025) in its recent advice to the Scottish Government that the in the CCC's recommended 'balanced pathway', that the capacity of variable renewables in Scotland (including offshore and onshore wind and solar and BESS) more than triples from 15 GW in 2023 to 49 GW by 2035, increasing to 66 GW by 2045. This would provide 98% of electricity generation in Scotland in 2035 and would cater for forecast increases in electricity demand in Scotland and the rest of GB.
- 4.3.3 At the UK level, the Seventh Carbon Budget published in May 2025 assumes significant growth to 2030 and to 2050. For BESS the CB7 sets out the role and importance of BESS and predicts a ten-fold increase on 2023 levels deploying 35GW of short duration batteries by 2050.
- 4.3.4 The important benefits of the Revised Development have been set out in the context of the current climate emergency, and they would make a valuable contribution to addressing climate change and ensuring security and resilience in the network.

4.4 The Planning Balance

- 4.4.1 In NPF4 there is a clear recognition that climate change must become a primary guiding principle for all plans and decisions. Significant weight is to be given to the climate emergency and the contribution of individual developments to tackling climate change.
- 4.4.2 NPF4 is unambiguous as regards the policy imperative to combat climate change and the role that renewables, including storage, has in doing so. As described in the Applicant's policy submissions:

- 4.4.3 The global climate emergency and the nature crisis are the foundations for the NPF4 Spatial Strategy as a whole. The twin global climate and nature crises are “*at the heart of our vision for a future Scotland*” so that “*the decisions we make today will be in the long-term interest of our country*”⁵;
- > NPF4 Policy 1 (Tackling the climate and nature crises) directs decision-makers to give significant weight to the global climate emergency in all decisions. This is a radical departure from the usual approach to policy and weight and clearly denotes a step change in planning policy response to climate change. The matter of weight is no longer left entirely to the discretion of the decision maker; and
 - > NPF4 is clear that renewable energy and grid transmission infrastructure plays a crucial role in combatting climate change, transitioning to a net zero Scotland and ensuring security of energy supply. NPF4 Policy 11 (Energy) strongly supports proposals for all forms of renewable, low-carbon and zero emissions technologies, including storage.
- 4.4.4 It is important to fully recognise both the scale and urgency of the challenge set out in these documents, and the required response from decision-makers. NPF4 is clear that significant progress must be made by 2030 requiring a range of technologies and transmission infrastructure to be delivered.
- 4.4.5 As the Statement of Need for Strategic Renewable Electricity Generation and Transmission Infrastructure explains⁶ “*A large and rapid increase in electricity generation from renewable sources will be essential for Scotland to meet its net zero emissions targets.*”
- 4.4.6 The Applicant has gone to considerable lengths to ensure a satisfactory layout, design and composition for the Proposed Development. In short, through the design review process, appropriate design mitigation has been applied, in particular with regard to how the Applicant has responded to matters raised by the Council as regards cumulative landscape and visual effects. The environmental effects resulting from the proposal have been addressed through an iterative design process (i.e. ‘mitigation by design’) and a well-considered proposal has been established, which has acceptable effects, and it would also deliver a significant opportunity for biodiversity enhancement.
- 4.4.7 NPF4 requires that the decision-maker must also identify and weigh the adverse effects of a proposed development. However, increased weight is to be given to the benefits of a proposed development in the planning balance owing to the seriousness and importance of energy policy related considerations and the contribution of the Proposed Development in meeting climate change targets.
- 4.4.8 It is considered that this approach is very clearly reflected and articulated in NPF4. NPF4 has not altered the requirement to undertake a balancing exercise and to consider the adverse impacts of a development proposal; but the relative weight to be ascribed to the benefits of a renewable development and its residual adverse effects has changed with NPF4.
- 4.4.9 The development would make a valuable contribution to help Scotland, and the UK attain net zero, security of supply and related socio-economic objectives. It is submitted that significant weight should be given to this contribution when weighing the need for the development and its identified effects within the planning balance. The effects have been demonstrated to be minimal and localised, with good use of clustered siting adopted to further aide integration of infrastructure within the landscape.
- 4.4.10 The Proposed Development is considered to be in accordance with the relevant policies of NPF4 and the LDP.
- 4.4.11 The limited effects of the proposal, including how relevant effects listed in NPF4 Policy 11(e) have been addressed, is detailed in the supporting information to the application. In terms of Policy 11, in considering the identified impacts of the development significant weight must be

⁵ NPF4, page 2.

⁶ NPF4, page 103.

placed on its important contribution to renewable energy generation and greenhouse gas emissions reduction targets.

4.5 Overall Conclusion

- 4.5.1 The policy set out in NPF4 requires a rebalancing of the consenting of energy developments in response to the challenges of tackling the climate and nature crises. Having regard to the weight to be ascribed to the important benefits of the Revised Development it is considered that the benefits of the Proposed Development clearly outweigh any adverse local effects.
- 4.5.2 The up-to-date policy set out in NPF4 and the policy being consulted upon in the draft Energy Strategy and Just Transition Plan, together with the various energy policy related documents referred to in this Planning Statement Update provide strong and increased support for the grant of consent for the proposal.
- 4.5.3 The conclusion is that the Revised Development would be consistent with all relevant policies of the Development Plan, and with the Development Plan when read as a whole and relevant material considerations further support the position that planning permission should be granted, subject to appropriate planning conditions.

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