

# Development Management Sub Committee

**Wednesday 9 September 2020**

**Report for forthcoming application by**

**Kaimes Renewable Energy Park for Proposal of Application Notice**

**20/02823/PAN**

**at West Of Existing Kaimes Substation, Old Burdiehouse Road, Edinburgh.**

**Proposed renewable energy development comprising solar panels/photovoltaics, battery storage, flexible gas generation and associated infrastructure.**

**Item number**

**Report number**

**Wards**

B16 - Liberton/Gilmerton

## **Summary**

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The purpose of this report is to inform the Development Management Sub-Committee of a forthcoming detailed application for a renewable energy development comprising solar panels/photovoltaics, battery storage, flexible gas generation and associated infrastructure.

In accordance with the provisions of the Town and Country Planning (Scotland) Act 1997, as amended, the applicant submitted a Proposal of Application Notice on 10th July 2020 (20/02823/PAN).

## **Links**

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**Coalition pledges**

**Council outcomes**

**Single Outcome Agreement**

## **Recommendations**

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- 1.1** It is recommended that the Committee notes the key issues at this stage and advises of any other issues.

## **Background**

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### **2.1 Site description**

The site consists of three parcels of land, located on the northern side of the City of Edinburgh Bypass (A720), with a total site area of approximately 38 hectares. Agricultural fields border the site to the north and west. Immediately to the east, lies the existing Kaimes substation and its associated infrastructure. To the north-east across Burdiehouse Road there is established residential development, and to the north-west of the site across an area of open space, there are a total of 633 houses under construction by Barratt Homes (application number: 14/04860/FUL).

The site lies within an area designated as Green Belt and the west part of the site is part of a Special Landscape Area. The Morton Mains Conservation Area lies in close proximity to the west.

### **2.2 Site History**

There is no relevant planning history for this site.

## **Main report**

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### **3.1 Description of the Proposal**

The proposed development comprises a mix of renewable energy development including:

- Up to 12 mega-watts (MW) Solar Panels / Photovoltaics (battery charging and baseload generation);
- 15 storage units of up to 30MW Battery Storage;
- 12 gas generators of up to 20MW Flexible Gas Generation; and,
- A customer 33kv substation and a DNO 33kv substation.

The site would be occupied mainly by the proposed solar panels / photovoltaics (PVs) across most of the site. These photovoltaic panels can produce energy from sunlight, even on cloudy days. The panels will be tilted, fixed in place, and orientated to face south towards the sun. The maximum height of the panels proposed is 2.2 metres.

The solar panels would be mounted in rows, on a framework system, with each array mounted on the aluminium frame with leg spikes into the ground. Each array would be separated to avoid overshadowing between panels and allow maintenance access. The ground below the solar panels / PVs will be available for livestock grazing during use and can be returned to agricultural use following removal of the panels and aluminium frames supporting them.

The 15 battery storage units of up to 30MW are sited adjacent to the Kaimes electricity substation and the proposed solar farm to facilitate grid connection to the National Grid. The battery storage units would be similar in size and appearance to a standard shipping container. An underground cable would connect the battery storage facility to the onsite substation.

The 12 flexible gas generators use natural gas to drive reciprocating generators. Each generator will be housed in a single sound-proofed container and each will have an exhaust flue with appropriate emissions mitigation.

These generators would be connected directly to the battery storage assets and the grid and provide additional rapid response generation to supplement and occasionally recharge the batteries. These assets are not used for baseload generation, and only operational at times of peak demand or system stress.

Therefore, this is a hybrid scheme incorporating renewables but also gas, for viability. The gas generators could use biogas and combined heat and power (CHP) could be considered.

Ancillary infrastructure, including access arrangements and perimeter security, would also be required.

### **3.2 Key Issues**

The key considerations against which the eventual application will be assessed include whether:

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#### **(a) the principle of the proposed development is acceptable in this location;**

This site is within the green belt of Edinburgh and as such the Edinburgh Local Development Plan policies including policy Env 10 Development in the Green Belt and Countryside must be considered. The site will also be assessed against all other relevant policies within the LDP and the Edinburgh Design Guidance. Therefore a clear and justified rationale for this development within the greenbelt should be included with the application. This should also explain how the proposal impacts on the green belt's stated aims. The sequential test, allowing comparison with other suitable sites both urban and green belt, should also be included.

**(b) the impact of the proposal on the landscape and visual impact, including the impact on the Conservation Area;**

The west field is within a Special Landscape Area. Stated green belt aims include protection and enhancement of the landscape setting and identity of the city and the openness of the green belt. Therefore a comprehensive and robust Landscape and Visual Impact Assessment from a number of viewpoints, both local and more strategic, is essential. The issue of glint and glare and visibility should also be assessed. Therefore the assessment should assume the worst-case scenario with low winter sun and full glint and glare of the solar panels when assessing the landscape and visual impact.

The Morton Mains Conservation Area is also in close proximity. The impact of the proposed development on the character, setting and appearance of the Conservation Area, of views into and from the Conservation Area should be assessed.

**(c) the design, scale and layout and cumulative impact of the proposed development and compliance with the design policies of the Local Development Plan;**

The proposal will be assessed against all relevant design policies within the LDP as well as guidance where applicable, e.g. Development in the Green Belt and Countryside and the Edinburgh Design Guidance. A design and access statement will be required for support the application. The application is for solar/PV panels, battery storage and peaking gas storage containers as well as a substation and all other ancillary infrastructure. This is likely to include access, security and fencing structures. Therefore the forthcoming application should highlight the height and massing of such structures so that the cumulative impact of this proposal can be fully assessed.

**(d) the impact on ecology, and public access into and around the site;**

This is a greenfield site which is part of the supporting habitat for the Special Protection Area. Therefore a Habitat Regulations Appraisal needs to be undertaken. There is also a Local Nature Conservation Site, along the Burdiehouse Burn corridor and therefore any impact on ecology would need to be assessed particularly the impact of any glint or glare from the solar panels, for birds and bats. There is also the potential for significant biodiversity gains including hedges, field margins, wild flower meadows, bird boxes and ponds which should be considered in the development of the proposals. There is a core path route near the site which could facilitate public access or engagement information about the site.

**(e) flooding impacts;**

The site is within an Area of Importance for Flood Management and therefore the proposals should include flood risk assessment and surface water management plans.

**(f) the impact on air quality and noise impact;**

The proposals include peaking gas flue emissions and the air quality impacts should be assessed. The proposals may give rise to noise or vibration issues and therefore a noise impact assessment is also required.

**(g) Transport and public safety;**

The proposal shall have regard to the LDP transport policies, design guidance, developer contributions and infrastructure delivery supplementary guidance. The transport impacts including public safety of the proposals should be assessed as well as access and connections to and from the site. There are a number of pedestrian and cycle routes and therefore the impact from this site to these users' needs to be considered. Any glint and glare assessment should take into account impact on road users, cyclists and pedestrians.

**(h) the impact on archaeology;**

An archaeology assessment would be required due to the findings on the adjacent Broomhill's site during construction.

**(i) Mix of Energy and Renewables;**

This is currently a hybrid scheme including some renewable energy sources. The potential for biomass or combined heat and power (CHP) should be investigated. The proposed development should be accompanied by clear rationale for the proposed mix of energy.

**(j) Environmental Impact Assessment and any other environmental factors that require consideration**

An Environmental Impact Assessment screening opinion should be submitted prior to the submission of the full application. The applicant will be required to submit sufficient information to demonstrate that the site can be developed without having an unacceptable detrimental impact on the environment.

In order to support the application, the following documents are anticipated:

- Pre-application consultation report;
- Planning Statement;
- Design and Access Statement;
- Landscape and Visual Impact Assessment;
- Glint and Glare Assessment;
- Sustainability Statement;
- Transport Information;
- Ecology Information including a Habitats Regulations Appraisal;
- Energy rationale information;
- Archaeology Information;
- Flooding risk and drainage information and
- Noise/Air quality information.

### **3.3 Assessment**

This report highlights the main issues that are likely to arise in relation to the various key considerations. This list is not exhaustive and further matters may arise when the new application is received, and consultees and the public have the opportunity to comment.

## **Financial impact**

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4.1 The forthcoming application may be subject to a legal agreement.

## **Risk, Policy, compliance and governance impact**

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5.1 Provided planning applications are determined in accordance with statutory legislation, the level of risk is low.

## **Equalities impact**

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6.1 This is a pre-application report. When a planning application is submitted it will be assessed in terms of equalities and human rights.

## **Sustainability impact**

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7.1 A sustainability statement will need to be submitted with the application.

## **Consultation and engagement**

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### **8.1 Pre-Application Process**

Pre-application discussions took place on this application.

### **8.2 Publicity summary of representations and Community Council comments**

A copy of the Proposal of Application Notice (PAN) has been submitted to all Ward Councillors and Gilmerton and Inch, Liberton and District and Fairmilehead Community Councils. The PAN is also circulated to the Edinburgh and Lothian Greenspace Trust, and Friends of Burdiehouse Burn Valley Park.

In light of the ongoing Covid-19 situation and new Scottish Government Guidance on pre-application consultation, revisions have been made to the consultation strategy.

The applicant is to confirm dates and times for online Q&A Session and event & information website. Leaflets/posters advertising the online event to be distributed to neighbouring properties/public areas is also required.

## **Background reading/external references**

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- To view details of the proposal of Application Notice go to
- [Planning and Building Standards online services](#)
- [Planning guidelines](#)
- [Conservation Area Character Appraisals](#)
- [Edinburgh Local Development Plan](#)

### **David R. Leslie**

Chief Planning Officer

PLACE

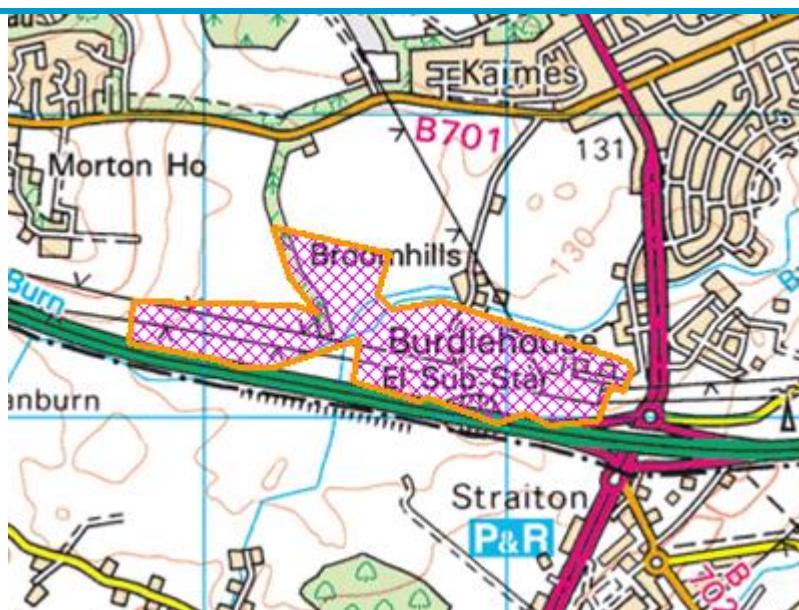
The City of Edinburgh Council

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## **Location Plan**

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