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Via email: ministerenergy@gov.scot

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REQUEST FOR SCOTTISH GOVERNMENT INTERVENTION TO STOP THE PROLIFERATION OF BATTERY ENERGY STORAGE SYSTEMS (BESS) IN OUR AREA

I write in my capacity as Chair of Leitholm, Eccles and Birgham Community Council on behalf of our community to seek your urgent assistance to stop the proliferation of BESS in the vicinity of Eccles Sub-station.

This is a rural environment amongst some of the best arable land in Scotland. *(A typical 3 year rotation would be year 1: Wheat (Yield 3.5 tons/acre), year 2: Oilseed rape (Yield 1.5 tons/acre) and year 3 Winter Barley (Yield 3 tons/acre) .*

Our people come from a range of backgrounds: some work the land or are in the agricultural support and services sectors while others have chosen to retire to this idyllic part of the country. All are heavily invested in the lifestyle, our natural habitat and community. We are extremely anxious that our way of living will be lost forever in the aftermath of the industrialisation caused by BESS developments.

We recognise and support the Scottish Government's plans to create the conditions for a Net Zero energy system and the role that renewables and other zero-carbon technologies need to play to provide all the services required to ensure a secure energy system. However, this has to be balanced with other countryside interests.

As a Community Council we recently took the position not to object to the development of three BESS systems¹, two of which are now approved and one is at application stage. These are situated immediately adjacent to our local Eccles sub-station, all located 2km from our nearest village of Leitholm. In addition, we did not object to plans to significantly extend the Eccles substation to cater for these developments.

¹ Energy Consents Unit (ECU) references: ECU00004601 (consented); ECU00004804 (application) & Scottish Borders Council reference: 22/01988/FUL (decided)

- They will provide a total storage capacity of 950 MW, amounting to 4.75% of the total UK storage capacity needs by 2035²;
- They total 29.5% of the total Scottish BESS storage capacity in MW - 0.90 GW of the 3.055 GW total - represented by the 20 BESS applications to the Energy Consents Unit (ECU) moved to 'Development' stage since 1st January 2020;

Taken together with the substation development, they cover a total footprint of 103 acres, 6.5 times the footprint of our nearest village, Leitholm. With a population of 843 people in our Community Council area, our rural community feel that we are making more of a contribution to the move towards Net Zero than any other community in Scotland and probably the whole of the UK.

While we took a pragmatic and considered approach not to object to these initial three schemes, this appears to have been a catalyst for BESS speculators to flood our community with ill-conceived applications. Consultations are underway for two further BESS developments³ for a further 840 MW of storage capacity, a further 4.2% of the UK's 2035 needs. These schemes differ from those we did not object to. They are not located adjacent to the sub-station - the furthest is 3.3km away - which will result in cumulative and sequential landscape impacts, as well as a loss of residential amenity. They are also proposed on 94 acres of 'prime agricultural land', i.e. that graded 1, 2 or 3.⁴ Please see appendix 1.

For reference, of the 20 BESS applications to the ECU moved to 'Development' stage since 1st January 2020, only three are located on prime agricultural land and each of these are located immediately adjacent to the sub-station. Please see appendix 2.

The National Planning Framework 4, Policy 5 states that *"Development proposals on prime agricultural land...will only be supported where it is for...essential infrastructure and there is a specific locational need and no other suitable site"*.

Within 2.5km of our small village we could soon have between 4.75%-8.75% of the UK's total BESS storage needs and 29.5%-44.7% of all planned BESS storage capacity in Scotland applied for over the last 4 years. It is the clear position of our community that there is no *"specific locational need"* for us to have to bear any further BESS developments, and especially not on 94 acres of prime agricultural land located up to 3.3km from the substation which will result in cumulative and sequential landscape impacts.

Of the 20 BESS applications to the ECU moved to 'Development' stage since 1st January 2020, 11 have been approved at sites adjacent to substations or windfarms and the other 9 are located on non-prime agricultural land, including a former colliery and waste-water treatment works. With substations, windfarms and non-prime land located across Scotland, there should be no need to locate any further

² [Decarbonisation of the power sector - Business, Energy and Industrial Strategy Committee \(parliament.uk\)](https://www.parliament.uk/business/committees/committees-a-z/business-energy-and-industrial-strategy-committee/)

³ ECU00004872 and one further development in consultation without a screening request being submitted to the ECU

⁴ As defined by the James Hutton Institute

BESS developments on prime agricultural land in proximity to such a small community already taking far more than its fair share.

It has now reached a point where this is not a *Just Transition* to Net Zero - for our community it is unjust. This is not community empowerment - it has become an imposition by speculative BESS development companies on our community which we have united en masse to object to.

As a Community Council we are very concerned about the planning processes involved with BESS developments in our area as these are clearly weighted in favour of developers:

- The Energy Consents Unit has a priority the Transition to Net Zero, as such they must lean towards granting permission.
- Developers have infinite access to legal and technical support and as much time as they wish to submit their applications.
- Conversely, we as a Community Council and individuals impacted by such developments, have four weeks to object with great difficulty in establishing facts independently.

These factors are exacerbated by the apparent sharp practice and irrational behaviour of developers, the greed of some of our landowners tempted by massive potential leasing agreements and the obfuscation by SP Energy. (Appendix 3)

We write to you to ask for your support and intervention on two fronts:

- i. With each BESS submission being reviewed individually, there needs to be a way for the hugely significant cumulative effect to be assessed. We therefore ask that you request all further BESS applications within our Community Council area, beyond the three that we have not objected to, be put on hold in order to conduct an assessment of the cumulative impact of all BESS developments being planned for our area; and
- ii. Rachel Hamilton, our MSP, has requested that you meet with us to discuss the situation. We therefore ask for you to visit our community with the Chief Planner, meet with our Community Council and see for yourself the potential existential impact that such speculative development will have on our community and way of life, including on our environment, landscape, and on the well-being of our local residents. We hope that such a visit can help to inform the timely production of strategic guidance by the Chief Planner for National Planning Framework 4, Policy 5 to guide future planning policy for BESS developments and supplant the current situation where unbridled market forces are determining where and how many such developments occur, no matter the consequences to our communities and countryside.

Yours faithfully,



Bob Hope, Chair

Leitholm, Eccles & Birgham Community Council

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For Press Release.

Appendix 1 - Map of Planned BESS Developments within the Leitholm, Eccles & Birgham Community Council area



Appendix 2 - Summary of BESS applications to the Energy Consents Unit moved to 'Development' stage - both consented or at application - 1st January 2020 to 14th September 2023

<u>ECU Reference</u>	<u>Project Name</u>	<u>James Hutton Land Classification</u>	<u>Location - Category</u>	<u>Case Type</u>	<u>Case Status Type</u>	<u>MW</u>
ECU00003404	Section 36 Blackhillock Battery Energy Storage	Non-prime Agricultural Land	Adjacent to Substation	Development	Consented	300
ECU00003435	Kilmarnock South Battery Electricity Storage System (BESS)	Non-prime Agricultural Land	Adjacent to Substation	Development	Consented	300
ECU00004799	Carlisle Road Battery Energy Storage System	Non-prime Agricultural Land	Non-prime Agricultural Land	Development	Application	200
ECU00004907	Kinmuck Battery Energy Storage	Non-prime Agricultural Land	Adjacent to Substation	Development	Application	105
ECU00002154	Black Law Battery Energy Storage System	Non-prime Agricultural Land	Adjacent to Windfarm	Development	Consented	100
ECU00002197	Kilgallioch Battery Energy Storage System (BESS) & Associated Works	Non-prime Agricultural Land	Adjacent to Windfarm	Development	Application	100
ECU00003354	Tealing Battery Energy Storage farm	Non-prime Agricultural Land	Non-prime Agricultural Land	Development	Application	80
ECU00004881	Shetland Battery Energy Storage System (BESS)	Non-prime Agricultural Land	Adjacent to Substation	Development	Application	70
ECU00004543	Linwood Battery Energy Storage System (BESS)	Non-prime Agricultural Land	Non-Agricultural	Development	Application	69
ECU00004544	Stanely Water Battery Energy Storage System	Non-prime Agricultural Land	Non-Agricultural	Development	Application	69
ECU00004521	KEITHICK SOLAR ENERGY PARK WITH BATTERY STORAGE SYSTEMS (BESS) & ALL ASSOCIATED INFRASTRUCTURE INCLUDING CABLING & BIODIVERSITY ENHANCING SCREENING	Non-prime Agricultural Land	Non-Agricultural	Development	Consented	66
ECU00002112	Dersalloch Battery Energy Storage System	Non-prime Agricultural Land	Adjacent to Substation	Development	Consented	50
ECU00002198	Whitelee Windfarm - Solar PV Farm and Battery Energy Storage System	Non-prime Agricultural Land	Adjacent to Windfarm	Development	Application	50
ECU00003345	Frodo Solar and Battery Energy Development	Non-prime Agricultural Land	Non-prime Agricultural Land	Development	Consented	50
ECU00004855	Loch Fergus Solar Farm and Battery Storage.	Non-prime Agricultural Land	Non-prime Agricultural Land	Development	Application	40
ECU00004702	Benthead Solar and Battery Storage	Non-prime Agricultural Land	Non-prime Agricultural Land	Development	Consented	31.1
ECU00002222	Randolph Solar Farm and associated battery energy storage facility	Non-prime Agricultural Land	Non-prime Agricultural Land	Development	Consented	25
ECU00004804	Eccles II Battery Energy Storage System (500 MW)	Prime Agricultural Land	Adjacent to Substation	Development	Application	500
ECU00004631	Alyth Battery Energy Storage System & Associated infrastructure	Prime Agricultural Land	Adjacent to Substation	Development	Application	450
ECU00004601	Eccles Battery Energy Storage System (BESS)	Prime Agricultural Land	Adjacent to Substation	Development	Consented	400
Total MW						3,055.1
Leitholm & Eccles Total MW						900.0
Leitholm & Eccles Total %						29.5%

Appendix 3 - Apparent sharp practice and irrational behaviour of developers, the greed of some of our landowners tempted by massive potential leasing agreements and the obfuscation by SP Energy.

Apparent sharp practice and irrational behaviour of Developers:

The process is started by consultants working on behalf of developers 'cold calling' landowners like super charged doubleglazing salesmen making offers for fields of about 25 acres which are to lease the fields for 40 years on what appears to be sums of £600 - £750k per year. This is deceiving, as no actual money is being offered. What is being offered is to lease the fields in exchange for a set number of megawatts of electricity transferred to the grid by the subsequent BESS: the stated value of said megawatts being in the region of £600 - £750k per year. With fields worth less than £600k to buy, it appears irrational for developers to lease as opposed to purchase. When asked for an explanation, developers declined to respond.

Preapplication consultations are routinely held outside the community impacted by any future development.

Name changes to protect parent companies are the norm: Amp Clean Energy is currently Eccles Grid Stability Ltd. Weaver Power, whose parent company is Intergen is now Eccles Energy Centre Ltd.

As previously stated, the process of creating a BESS involves filling a field with concrete and gravel to support hundreds of freight units. It is not inconceivable that the above practices are to protect parent companies from the huge expense which would be involved, if such is possible, in returning BESS fields to productive arable land.

During consultations developers have always made it clear to attendees that there is no scope for significant Community Benefit payments or compensation to home-owners impacted socially and financially by BESS developments as BESS do not have the same profit margins as Wind Turbine developments. This is despite landowners being offered eye watering amounts at the start of the process.

Obfuscation by SP Energy Networks:

SP Energy Networks (SPEN): Clearly, the number of BESS developments in our area are dependent upon the capacity of Eccles Sub-Station. Our Community Council recently considered a planning application for SPEN to extend the sub-station, we decided that it was in the National interest and we did not object. As further applications for BESS developments came to light we enquired as to the capacity of Eccles Sub-Station and the main power lines taking electricity south. A meeting with Zenobe had suggested that should they and Weaver Power be granted permission then the capacity of the sub-station would have been reached and further applications were unlikely. The response from SPEN was as follows: ***"SPEN are required to provide connections when asked to do so and developers may continue to seek additional future connections which need to be facilitated in line with network capacity and grid flexibility."***

We have tried several times to tie SPEN to an actual answer as “*facilitated in line with network capacity and grid flexibility*” did not provide an answer.

What is more concerning is that our MSP, Rachel Hamilton tabled questions with SPEN and also received ambiguous and in my opinion, less than honest responses. The questions and responses are as follows:

What is the capacity of the Eccles substation?

Answer: 2x 60MVA transformers – so the total capacity is 114MW.

NB. I believe that the answer given is accurate at this time, however, it does not take any account of the planning permission passed to extend the sub-station which was received about the same time as the answer was provided.

How many battery storage plants do you plan to be connected to the substation over the next 10 years? **Answer: Currently there are no battery storage units due to be connected.**

NB. From developers planning applications we are aware that Zenobe, Clean Amp Energy and Weaver Power have been granted connections to the grid at Eccles Sub-station between now and 2030.

How many battery storage plants can you have connected to Eccles substation without it going over its current capacity? **Answer: Unfortunately this is something that we would not be able to confirm without understanding the type of battery that would want to connect and a range of other factors.**

Has SP been made aware of any community concerns regarding proposed battery storage plants? **Answer: From a distribution point of view we have not been made aware of any community concerns.**

NB. Our Community Council has been in regular contact with SPEN in an attempt to understand the situation with connections from BESS since 28th July when my email to them opened with the sentence “At this time we are concerned with the potential proliferation of planning applications for battery energy storage facilities in our area.”

We tried to make sense of the National Grid ESO strategy document: a 224 page technical document with a 14 page executive summary. From this we gleaned that the UK has a target of providing 20GW of battery storage by 2035. On current applications Eccles could have 1.6GW of storage by 2030, a disproportionately high amount for a small rural area.

Through obfuscation on the part of developers and SP Energy Networks, we now question this need for BESS to be located close to the sub-station, particularly as this is prime arable land. With some planning, batteries could be supplied to homes and businesses whereby they would be able to take advantage of off-peak electricity thereby reducing their electricity bills as opposed to the significant premium they will soon be paying due to the brokering system used by BESS developers. Plans currently being prepared relating to Leet Hill near Duns would see wind turbines, solar panels and battery storage on the same site allowing the developer to manage all their own renewable energy at source.