

THE ELECTRICITY WORKS ENVIRONMENTAL IMPACT ASSESSMENT (SCOTLAND) REGULATIONS 2017

CONSULTATION RESPONSE OF SOUTH AYRSHIRE COUNCIL TO A REQUEST FROM THE SCOTTISH GOVERNMENT (ENERGY CONSENT UNIT) IN RELATION TO A SCREENING OPINION SUBMITTED UNDER THE ELECTRICITY WORKS ENVIRONMENTAL IMPACT ASSESSMENT (SCOTLAND) REGULATIONS 2017. THE PROPOSED DEVELOPMENT SITE IS LOCATED AT LAND TO THE NORTH OF CAMSISCAN FARM, CRAIGIE, A719 FROM COUNCIL BOUNDARY SOUTH TO B730 JUNCTION AT MARCH BRIDGE, CRAIGIE, SOUTH AYRSHIRE, KA1 5JT.

ENERGY CONSENT UNIT REFERENCE: ECU00004627 (Kilmarnock South BESS)
SOUTH AYRSHIRE COUNCIL REFERENCE: 22/00861/EIASCR

The proposed development primarily comprises of a 350MW Battery Energy Storage System (BESS) with associated infrastructure including access road, storage units, fencing and landscaping on land within South Ayrshire Council administrative boundary. The proposals also include the provision of underground cabling connections (undertaken as Permitted Development by Scottish Power) to the existing Kilmarnock South Substation on land within East Ayrshire Council administrative boundary. We understand that access to the site will be provided via existing gates (as may be modified) to the current agricultural fields from the unnamed road which runs to the immediate north of the site. As set out in the supporting information, this is seen as the most appropriate way to reduce the amount of visual change whilst also providing safe access and egress to the facility.

From review of the supporting letter provided as part of the submission to the Energy Consents Unit (ECU), we understand the proposals to include the following primary physical components and features:

- *Layout of a containerised battery units placed within a compound set on uncompacted gravel underneath and in between the containerised units and equipment. The applicant has stressed that the design and arrangement have not yet been finalised although indicative site layout plans have been supplied. Whilst it is set out that the containers would most likely reach approximately 3m, it is acknowledged that there is a potential that they could be stacked one on top of the other to a height no more than 10m (this would be to meet energy requirements).*
- *If required by energy operators, the development could include a BESS Substation building, and associated apparatus situated within a compound. The applicant has advised that the exact massing and scaling are not yet known however the applicant has confirmed that it would be to a height of no more than 15m and that this will not be a single block of infrastructure to that height, but a maximum height for elements such as masts etc which are associated with the substation.*
- *The compounds would contain ancillary features such as inverters, switchgear, closed loop cooling units, control units, transformers with bunded compound, CCTV cameras and associated electrical infrastructure mounted on concrete pads.*
- *Industrial style green or close boarded timber security fencing between 2.4m and 4m in height around the site (for security reasons) including the BESS substation and battery compound.*
- *Terracing of the land with landscaping between the units and on the boundaries of the site (and no breaking of the ridge of the hill).*
- *A short access track for accessibility and maintenance for each terrace.*

- *Laying out of a hard surfaced site access into the BESS substation and battery compound from the internal road network and car parking bays*
- *A larger SUDS pond/reservoir located towards the south-west portion of the site.*
- *Additional catchment ponds downstream to collect water for pumping back to SUDS pond.*
- *Area of land retained as habitat improvement area within the site.*

As the proposed development would involve the installation of a BESS with a generating capacity in excess of 50MW, it is considered to sit within the auspices of a 'potential generating station' under Schedule 2 of the regulations. Therefore, it needs to be screened in order to determine whether the proposal constitutes 'EIA development'.

This determination is referred to as a '**screening opinion**'. In each case, the basic question to be asked is: 'would this particular development be likely to have significant effects on the environment?'

For many types of development, perhaps the majority, it will be necessary to consider the characteristics of the development in combination with its proposed location in order to identify the potential for interactions between a development and its environment and therefore determine whether there are likely to be significant environmental effects. In determining whether a particular development is likely to have such effects, the Council has taken account of the selection criteria in Schedule 3 to the Regulations. Three categories of criteria are listed:-

- 1. Characteristics of the development.
- 2. Location of the development.
- 3. Characteristics of the potential impact.

Consideration of the third of these categories is designed to help in determining whether any interactions between the first two categories (i.e. between a development and its environment) are likely to be significant.

The content and format of the checklist below is derived from the requirements of The Electricity Works (Environment Impact Assessment) (Scotland) Regulations 2017 – Schedule 3 selection criteria for screening Schedule 2 development.

Schedule 3 Selection Criteria	Yes/No	Briefly describe potential impact	Is effect likely to result in a significant effect? Please explain
1. Characteristics of the Development			
(a) Size and design of the development			
Will the proposed development be out of scale with the existing environment?	Yes	<p>The application site covers an area of approximately 13.45 hectares and comprises primarily of agricultural land that encompasses 4 distinct parcels of land associated with an existing farm complex.</p> <p>The site is located within a relatively gentle undulating landscape with the agricultural land that makes up the site bounded and broken up by a variety of hedgerows. The site is situated to the east of East Mosside Farm (which is the farm associated with these fields) and to the north of Camsiscan and Sidehead Farm steadings. An unnamed road network which serves a number of farms in the locality runs to the immediate north of the site and this would support the proposed development as an initial point of access.</p> <p>The built form associated with this development largely comprises of battery storage units/containers and a substation(s) which will be sited within defined compounds across the site. There will also be a series of supporting infrastructure and features which would form part of the development and this includes inverters, transformers, security fencing, CCTV cameras, ponds and access tracks and roads.</p>	<p>Given the lack of detail provided as part of the EIA Screening Opinion in relation to the proposed site layout and exact development arrangements, it is more challenging at this stage to provide any specific comments on considerations on quantifying and predicting the extent of the visual and landscape impacts of the development and whether it will be in broader terms, in scale with the existing environment.</p> <p>At present and as set out, the surrounding area and locality largely comprises of a series of undeveloped, sub-divided, open and low-lying agricultural fields. The introduction of this BESS facility alongside supporting infrastructure including containers and security fencing would clearly introduce large, vertical, built form into an area which is otherwise free from this type of development and would incur a notable change to the environment atleast in a local sense. Whilst the Council accepts the presence of free-standing lattice pylon overhead lines, single micro wind turbines and a series of farm steadings (which include buildings and structures of various scale) in the locality around the site, it is not considered that these in themselves offset or reduce the potential landscape and visual impacts of the development noting the differences in terms of its appearance, design pattern and layout to anything which currently exists in the surrounding environment.</p> <p>As set out in the applicants cover letter, it is anticipated that the containers will be single storey (up to 3m height) however could potentially be stacked, one on top of the other reaching a height of up to 10 metres in height, with aspects of the substation associated with the proposals potentially reaching up to 15 metres in height. The proposed</p>

			<p>heights combined with the concentrated nature of the development does make the visual and landscape impacts of the development a key consideration at this time.</p> <p>Notwithstanding this, it is noted from review that there are no notable or sensitive environmental, landscaping, settlements or heritage related designations within the locality which could be directly affected visually by the proposed development. In addition to this, the site itself whilst relatively low lying and visible from the immediate area around the site is also relatively remote and surrounded by undulating fields to the west and east, the topography of which rises and increases gradient in both of these directions, limiting views and offering a degree of self-containment. We anticipate that a combination of these factors will contribute to limiting and defining the reach and extent to which the development could be seen from the wider locality.</p> <p>Subject to this anticipated self-containment being clearly evidenced and demonstrated through the proposed Landscape and Visual Impact Assessment (including a suite of visualisations and viewpoints agreed with the Council in consultation with the ECU), alongside robust proposals and mitigation which look to minimise the visual and landscape impact of the development (including; an appropriate colour scheme, additional structured planting and landscaping around the containers and substation, the avoidance of stacking containers where possible), it is considered that the impacts of the development in visual and landscape terms will not be significant in EIA terms and these could be appropriately assessed through the consideration of the S36 application.</p>
(b) Cumulation with other existing and/or approved development			

<p>Will the proposed development lead to further consequential development or works?</p>	<p>Yes</p>	<p>Whilst the development will require a both ancillary structures and works to support it, as set out by the applicant in their cover letter, it is proposed that these would all form part of the development subject to any forthcoming S36 application.</p>	<p>No.</p> <p>Noting the nature and scale of the development and the information presented as part of this screening opinion, there is no conflicting reasons which suggest that all ancillary works (including service tracks and internal road or footpath networks) indicated, could not be reasonably self-contained to the agricultural fields subject to the application. The fact that this screening opinion includes all of these features at this stage indicates that these will all form part of a future application and this will ensure that the consequential and ancillary works associated with the BESS facility can be considered collectively and as part of the wider consideration of the development through the S36 application.</p> <p>On this basis and at this stage, none of the features are considered to be significant in terms of EIA and any effects as a result of the ancillary and consequential works and other supporting features needed to support the development can be adequately considered through the S36 application noting that they will be part of it.</p>
<p>Are there potential cumulative impacts with other existing development, approved developments or developments the subject of valid applications?</p>	<p>Yes.</p>	<p>The applicant in their supporting statement highlights 3 other BESS proposals to the south of the Kilmarnock (all of which have the potential to be developed). All of these are within East Ayrshire Council administrative boundary and are various stages in the planning process.</p>	<p>No.</p> <p>From review, the location of these BESS sites are some 1.7km offset from the application site for this proposal at their closest points. It would appear that the sites they are associated with are all adjacent to the existing Kilmarnock Sub-Station and are all outwith the South Ayrshire Council administrative boundary. It is considered that due to the separating distances combined with intersecting landform (which includes rising gradients that prevents them being visible from this site) that the potential cumulative impact with these other proposed developments is unlikely to be significant.</p>
<p>Should the application for the proposed development be regarded as an integral part of a more substantial project? If so, can related developments which are</p>	<p>Yes</p>	<p>Whilst this proposed development would not necessary be considered to form part of a more substantial</p>	<p>No.</p>

<p>subject to separate applications proceed independently?</p>		<p>project, it is relevant to note that the development in question includes proposals to install underground cabling to link this BESS facility to the existing and established Kilmarnock South Substation (situated within East Ayrshire Council administrative boundary). Indeed, the battery storage facility by its very nature is essentially dependent upon establishing such connections with other facilities and developments to have a sense of purpose and function effectively and so to some extent, establishing such a connection and link up is both expected and anticipated.</p>	<p>Notwithstanding the required connection highlighted, it is considered that this is still standalone and freestanding development which can proceed independently noting that the Kilmarnock South Substation is an existing and established facility. On this basis, it is not considered that effects are likely to be significant in this regard.</p>
<p>(c) Use of natural resources, in particular land, soil, water, and biodiversity</p>			
<p>Will the proposed development use natural resources such as land, water, materials or energy, especially any resources which are non-renewable or are in short supply?</p>	<p>Yes.</p>	<p>The battery storage and aspects of the supporting infrastructure will likely require the use of minerals and aggregates in their construction and the construction work will likely consume fossil fuels and aggregates.</p> <p>More broadly, as the application site does comprise of a series of agricultural fields, this in itself is a natural resource of land which could be impacted by the development.</p>	<p>No.</p> <p>The scale of resource use in terms of minerals and aggregates for the construction and operational phase is not considered to be significant in terms of EIA.</p> <p>With regards to the broader considerations in relation to the proposed development potentially implicating the use and availability of the agricultural land (as a natural resource in itself), it is noted that this site comprises relatively low grade (4.1) category agricultural land.</p> <p>Whilst siting the development on this land will undoubtedly compromise the availability of this land for agricultural use, it is considered that any potential impacts could be adequately considered and addressed through sufficient supporting information accompanying the future S36 application. On this basis, no significant effects are anticipated.</p>

(d) Production of waste			
Will the construction, operation or decommissioning of the proposed development produce wastes?	Yes.	<p>The applicant highlights solid waste to be produced during construction (e.g. packaging and materials) and specifies that this waste will be taken off-site and disposed of by certified contractors according to requirements.</p> <p>Noting the nature and purpose of the use, no waste is expected during the operational phase due to the limited activity on site. Toilets will be self-contained and foul waste will be disposed, off-site by certified contractors.</p> <p>Surfacer water will be discharged to the watercourses to the east with the use of attenuation ponds.</p>	<p>No.</p> <p>The scale of waste anticipated to be produced at construction, operation and decommissioning stages are not considered to be significant in terms of EIA.</p>
(e) Pollution and nuisances			
Will the construction, operation or decommissioning phases of the proposed development release pollutants or any hazardous, toxic or noxious substances to the air?	No	<p>Limited potential for impacts on air quality through the use of construction vehicles and machinery during the construction and decommissioning phases.</p> <p>Noting the nature and purposes of the use, whilst machinery and some vehicles movements will be associated with the operation phase, these are considered to be extremely</p>	<p>No.</p> <p>Noting the nature of the development, it is generally considered that there would be a low risk potential of pollution of air at any of the phases of development.</p> <p>The applicant has specified that the S36 application would be supported by a CEMP and this would include safeguarding mitigation. If it is deemed necessary and required, it would be possible to safeguard any receptors (land or water) from any contamination risk through the proposition of standard mitigation and appropriately worded planning conditions at S36 stage.</p>

		limited in the context of the development.	
Will the construction, operation or decommissioning of the proposed development lead to risk of contamination of land or water from releases of pollutants?	No.	<p>It is understood that the development could potentially have pollution consequences at construction and decommissioning stage from leaching of chemicals into the land and the ground water.</p> <p>Noting the nature and purposes of the use, no pollution issues are anticipated at operational stage.</p>	<p>No.</p> <p>Noting the nature of the development, it is generally considered that their would be allow risk potential of contamination/pollution of land or water.</p> <p>The applicant has specified that the S36 application would be supported by a CEMP and this would include safeguarding mitigation. If it is deemed necessary and required, it would be possible to safeguard any receptors (land or water) from any contamination risk through the proposition of standard mitigation and appropriately worded planning conditions at S36 stage.</p>
Will the construction, operation or decommissioning phases of the proposed development cause noise, vibration or the release of light?	Yes	<p>Noise and vibration are inevitable are both consequences of the development at construction phase.</p> <p>It is envisaged that there may be limited noise associated with the operation of battery storage, including from the proposed invertors, transformers and cooling units.</p> <p>Whilst the site is not located within any sensitive area and no receptors to noise, vibration or the release of light are within or adjacent to the site, there are a few isolated properties and farm steadings close to the development site, there is a potential for these to be impacted. The closest isolated properties to the area within the site where the BESS is proposed would be East Mosside Farm</p>	<p>No.</p> <p>Whilst construction noise is an inevitable consequence given the nature of the works, these matters can be reviewed and assessed as part of the S36 application. Any negative impacts would be for limited duration, intermittent and of a temporary nature.</p> <p>It is noted that the applicant proposes to include a 'Noise Impact Assessment' as part of any future Section 36 application and they have advised as part of their EIA Screening Opinion that this will be used to demonstrate that the noise generated by elements of the development at operation stage will not exceed required levels at the nearest noise sensitive properties. In addition to this, it is understood that this will be used to identify mitigation which will be incorporated into the design and layout of the development features to minimise noise and light to nearby noise sensitive receptors (including residential properties). On this point, it is considered that any noise effects identified for noise sensitive receptors could reasonably be mitigated given the size of the site which provides ample opportunities</p>

		(0.55km to the east of the site and which is associated with the development) and another residential property (1km to the southeast of the site). Camsiscan and Sidehead Farm steadings reside further away to the south of the site.	to site these noise generating elements of the development a sufficient distance from the isolated inhabited properties and buildings which could potentially be affected. Given the above, the likely magnitude of effect is not considered to be significant in terms of EIA. In turn, it is considered that the issue of noise impact can be adequately assessed through supporting information for the application.
(f) Risk of major accidents and/or disasters which are relevant to the development concerned, including those caused by climate change, in accordance with scientific knowledge			
Will there be any risk of accidents during construction, operation or decommissioning of the proposed development which could affect the environment or human health?	No	<p>During the construction stage, it is anticipated that there will be heavy machinery, transport and construction equipment/materials on site which all present danger and accident hazard.</p> <p>In this regard, there will always be risks associated with the construction phase of this type of proposal although no risks are anticipated that could have wider effects on people or the environment out with the site itself noting its location and characteristics.</p> <p>In addition to the above, the applicant references the fact that as this is an electrical proposal, there is a potential risk from fire (acknowledged risk for BESS sites). Notwithstanding this, they highlight that there are industry standards which need to be met and that in this case a pond and water system form part of the design layout to enable sufficient water</p>	<p>No.</p> <p>These risks will stand to be managed in accordance with industry standards and due protocol in safe working practice and it is not considered that their any potential risks as a result of the construction, operation or decommissioning stage which could significantly affect the environment or human health at this stage.</p> <p>With regards to the specific risks identified for BESS facilities, subject to a combination of the relatively remote/isolated nature of the site, the requirement to conform with industry standards alongside the inclusion of mitigation as part of the development proposals (ponds and water system), it is not considered that the potential affects on the environment and/or human health would be deemed significant at this time.</p>

		sources are available in the unlikely event of fire.	
(g) Risk to human health			
Will the construction, operation or decommissioning phases of the proposed development involve the use, storage, transport, handling or production of substances or materials which could be harmful to human health?	No	<p>It is understood that the development does not include any specific requirement to use, store, transport, handle or produce substances or material which could be harmful to human health.</p> <p>The applicant in their cover letter highlights that potential impacts from noise, vibration and light during construction can be mitigated through the design and compliance with all required Health and Safety Executive legislation.</p>	<p>No.</p> <p>It is understood that the proposed development will not involve substances/materials to a scale or significance that would present a risk to human health in EIA terms.</p>

Schedule 3 Selection Criteria	Yes/No	Briefly describe potential impact	Is effect likely to result in a significant effect? Please explain
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2. Location of the Development			
(a) Existing and approved land use			
Are there existing and/ or approved land uses in the locality of the proposed development site which could be affected by the proposed development?	No	As previously set out, the development will occupy a series of agricultural fields which currently form part of an existing farm holding. Naturally and consequentially, the siting of the development within parcels of agricultural land will comprise its ability to be used for agricultural purposes.	<p>No.</p> <p>Whilst the land affected by the development is primarily agricultural, it is relevant to note that this categorised as low grade and quality (grade 4.1). As previously set out, whilst this matter will require to be considered and accessed as part of any future application (including the materiality of the loss of agricultural land in favour of the proposed development), it is not considered that the siting of the development on this</p>

			agricultural land at this stage would be in itself be significant in EIA terms.
(b) Relative abundance, availability, quality and regenerative capacity of natural resources (including soil, land, water and biodiversity) in the area and its underground			
Are there any areas on or around the location of the proposed development and its underground, which contain important, high quality or scarce resources, which could be affected by the proposed development?	No.	From review of the Council's GIS Mapping System and other external resources such as the Carbon and Peatland Maps 2016 (Nature Scot), no such sensitive areas relating to resources have been identified within the land subject to the application site. This is with the exception of a trigger for a BGS Coal Resource Area which covers a significant portion of the development site.	No. Whilst it is recommended that the Coal Authority are engaged to establish the relevance of the Coal Resource Area trigger, based on the location of the application site and its current use, it is not considered that there is any known important, high quality or scarce resources which could be significantly effected by the proposed development. Whilst the site itself comprises of primarily agricultural land, as set out in previous sub-sections above, it is not considered that virtue of its grading and categorisation that this would sit within the auspices of an important, high quality or scarce resource. Its loss as a result of the development could be considered through the assessment of the S36 application.
(c) Absorption capacity of the natural environment			
Are there any areas on or around the application site that are protected under international or national legislation for their ecological, landscape, cultural heritage or other value which could be affected by the construction, operation or decommissioning of the proposed development?	No.	No such international or national sites sit within or adjacent to the application site for the proposed development.	No.

<p>Are there any other areas on or around the location which are important or sensitive for reasons of their ecology which could be affected by the proposed development? Particular attention should be paid to the following areas:</p> <p>(i) wetlands, riparian areas, river mouths; (ii) coastal zones and the marine environment; (iii) mountain and forest areas; (iv) nature reserves and parks.</p>	<p>No.</p>	<p>No known additional areas in or around the location of the application site are identified.</p> <p>In response to the specific areas identified for particular attention in Schedule 3, the following is noted:</p> <ul style="list-style-type: none"> (i) Small watercourses run close to the site. (ii) Not applicable noting the location of the site. (iii) Not applicable noting the location of the site. (iv) The nearest site of significance lies more than 1km from the site. 	<p>No.</p> <p>No additional areas in or around the location of the development site have been identified.</p> <p>The cover letter provided as part of the EIA Screening Opinion confirms that an Ecological Report is to accompany the future S36 application. It is noted that this will include consideration of the small watercourses which run close to the site alongside the nearest nature reserves/parks (e.g. the areas which require particular attention through Schedule 3).</p>
<p>Are there any areas on or around the location which are used by protected, important or sensitive species of fauna or flora which could be affected by the proposed development?</p>	<p>No.</p>	<p>No known areas have been identified.</p>	<p>No.</p> <p>Whilst there are no specific ecological designations that apply to the site, noting its rural location and the land cover and existing use, it is acknowledged that there is potential for sensitive and protected species and habitats on site.</p> <p>As set out above, the applicant has confirmed that the future S36 application will be supported by an Ecology Report. The cover letter confirms that a Phase 1 Study has already been carried out and this has been submitted to the ECU as part of the EIA Screening Opinion. The applicant also confirms that much of the site will be retained for habitat improvement, with specific areas also identified for biodiversity enhancement.</p> <p>It is considered that the potential direct and indirect effects of the development upon ecology which may inhabit or use the site can be considered as part of the assessment of the Section 36 application.</p>

Are there any groundwater source protection zones or areas that contribute to the recharge of groundwater resources which could be affected by the proposed development?	Unknown	Unknown. Please consult and refer to SEPA and Nature Scot on this matter specifically.	Unknown.
Are there any areas on or around the location of the proposed development where environmental quality standards are already exceeded which could be affected by the proposed development?	No	There are no known environmentally degraded areas affected by this site.	No.
Are there any areas on or around the location which are densely populated which could be affected by the proposed development?	No	<p>There is a scattering of farm dwellings and isolated properties within 2km of the site. The closest isolated properties to the area within the site where the BESS is proposed would be East Mosside Farm (0.55km to the east of the site and which is associated with the development) and another residential property (1km to the southeast of the site). Camsiscan and Sidehead Farm steadings reside further away to the south of the site.</p> <p>The closest actual settlements to the application site; Craigie and Kilmarnock are significantly further in distance to the west and north of the site respectively.</p>	<p>No.</p> <p>There are no densely populated areas within a proximity to this site which could be affected by the development in EIA terms given the distance, topography and intersecting land cover between the site and the nearest settlements of Craigie and Kilmarnock.</p> <p>Whilst some scattered properties remain in closer proximity to the site, it is considered that the site is of a sufficient size and scale to allow a degree of flexibility on siting to ensure these closer properties are not adversely impacted. These matters can be considered in more detail as part of the S36 application.</p>
Is the proposed development in a location where it is likely to be visible to many people?	No	The application site comprises of a series of agricultural fields and is situated within a relatively rural setting.	<p>No.</p> <p>Given the location of the site and the nature and scale of the development and associated features, it is considered that</p>

		<p>The closest larger settlements (which would host 'many people' as per the criteria) would be either Craigie or Kilmarnock.</p>	<p>there will be limited direct views from these settlements to the development site with a series of fields, areas of woodland and undulating terrain intersecting between it and the settlement and this limiting and screening any remaining views.</p> <p>It is considered that the proposed Landscape and Visual Impact Assessment as part of the future Section 36 application would be sufficient to consider and assess the extent, parameters and reach of visibility of the development. Including viewpoints from the direction of Craigie as part of the assessment specifically could assist to evidence the limited nature of visibility of the development from these more built up and populated areas. This can be discussed with the applicant and the ECU as part of the forthcoming pre-application process.</p>
<p>Are there any routes or facilities on or around the location which are used by the public for access to recreation or other facilities, which could be affected by the proposed development?</p>	No	<p>There are no Core Paths or known Public Rights of Way within or near the site.</p>	No.
<p>Are there any areas of local landscape or scenic value on or around the location which could be affected by the proposed development?</p>	No	<p>The site itself sits within the 'Ayrshire Lowlands' Local Landscape Character Type of the Local Development Plan (LDP) framework.</p> <p>There are no other areas around the application site which have specific categorisations or sensitives in landscape terms.</p>	<p>No.</p> <p>The suitability of the development in terms of the Local Landscape Character Type which apply of the LDP can be considered as part of the assessment of the S36 application.</p>
<p>Are there any areas of features of historic, cultural or archaeological value on or around the location which could be affected by the proposed development?</p>	Yes	<p>There are no designations or sites of historical, cultural or archaeological significance within the development site that could be affected by this proposed development.</p>	<p>No.</p> <p>As there is no identified sites or designations within the development site, there is no potential for direct impacts.</p> <p>With regards to indirect impacts on historic and cultural features, it would appear that there is limited designations in the wider area which could be affected, particularly noting the</p>

		The nearest cultural heritage feature of any significance is 800m beyond the site boundary and is intersected by a series of parcels of agricultural land and undulating landform and cover.	undulating terrain and landcover in the locality. Any potential indirect effects identified however could be adequately assessed through the 'Heritage Statement' which is to be provided as part of the S36 application.
Is the proposed development location susceptible to earthquakes, subsidence, landslides, erosion, flooding or extreme or adverse climatic conditions?	No.	No such constraints have been identified on the application site.	No. Based on the location of the application site and its current use, it is not considered that it is susceptible to any of these substantive environmental conditions. In turn it is not considered that there are any potential significant impacts in EIA terms at this stage.

3. Characteristics of the Potential Impact

(a) Magnitude and special extent of the impact (for example geographical area and size of the population likely to be affected)

Will the effect extend over a large geographical area, affecting many people and resulting in social changes, e.g. in demography, traditional lifestyles, employment?

No.

It is not perceived that the development will be of a magnitude to impact to this extent. As previously set out, it comprises of a collection of agricultural fields associated with an existing farm enterprise, with it being anticipated that the development is capable of fitting within the defined parcels of land which make up the agricultural fields (which comprises of approximately 13 hectares).

The site is surrounded by the same land uses (series of agricultural fields associated with farm enterprises) with sporadic scattering of residential properties, most of which sit a significant distance from the development site.

(b) Nature of impact

Is the development located within or close to any other areas which are protected under international, EU, or national or local legislation for their ecological, landscape, cultural or other value, which would be significantly affected by the development?

No.

No such designations or areas are located either within the site or close to its boundary.

(c) Transboundary nature of the impact

Will there be any potential for transboundary impact?

Yes.

The application site whilst within South Ayrshire Council administrative boundary, is in very close proximity to East Ayrshire Council administrative boundary. Although given its proximity to the boundary it is inevitable that the development would be seen from land situated within East Ayrshire Council boundary, noting a combination of the scale and nature of the development, the landform and undulations of terrain in the surrounding area (particularly the increase in height to the north, north east and north west of the site) and the general consistency in land uses in the locality (including the land immediately neighbouring the site within East Ayrshire), it is not considered that the proposed development will have any transboundary impacts which could be deemed to be significant in EIA terms.

Notwithstanding the above, South Ayrshire Council would expect that the Energy Consents Unit (ECU) engages East Ayrshire Council to ensure that their views on the potential for transboundary impacts are captured and considered as the neighbouring authority.

(d) Intensity and complexity of the impact

Is there a risk that environmental standards will be breached?

No.

There is no identified risk in this regard.

(e) Probability of the impact

Is there a high or low probability of a potentially highly significant effect?

There is a low probability of a highly significant impact/effect based on consideration of all of the above.

(f) Expected onset, duration, frequency and reversibility of the impact

Will the effect be permanent, continuous or irreversible?

No.

Whilst this will be in effect a permanent development on the land that would be established for an extended period of time, it will at the same time have an operational lifespan. Whether the development in the future is subject to repowering or is simply decommissioned remains to be seen and it is not possible to define this at this stage.

Notwithstanding this though, noting the nature, scale and operation of the proposed development and in particular the anticipated physical build and construction works to develop it, it is considered that its effects will not be significant in EIA terms.

(g) Culmination of the impact with the impact of other existing and/or approved development

Will the Project have cumulative effects, due to its proximity to other existing or planned Projects with similar effects?

No.

The development by its very nature relies on establishing connections with other generating and renewable facilities and to a wider grid in order to operate to its full purpose and functionality. As set out earlier in the assessment, this proposed development will be linking into the Kilmarnock South Substation through extended underground cabling (undertaken through Permitted Development rights by Scottish Power). The Kilmarnock South Substation is an existing and established facility, and it is noted that there are a number of other BESS sites at various stages in the planning process which are close to and/or adjacent to this substation.

Notwithstanding this, both the Kilmarnock South Substation and other BESS sites (all of which are situated within East Ayrshire Council administrative boundary), are at least 1.7km from this site and are intersected by various land uses and cover. Given the intervening distances between the existing and proposed sites to this application site (which means none of these sites can be physically seen from the application site) and it is not considered that their would be cumulative impacts in conjunction with these other existing and proposed generating facilities.

(h) Possibility of effectively reducing the impact

Will there be any significant adverse effects on any aspect of the environment during the construction and operational phases of the development, has the developer included mitigation measures to avoid, prevent, repair or reduce the potential impact?

No.

It is not considered that there will be any significant adverse effects on any aspect of the environment during the construction and operational phases of the development.

The applicant has set out their commitment to provide a series of supporting technical reports and assessments with their forthcoming Section 36 application. As part of this, the commentary provided in their cover letter indicates that these will be used to inform the design layout of the development and to establish mitigation to minimise and avoid potential impacts. Supporting information proposed includes:

- Design and Access Statement

- **Planning Statement**
- **Pre-Application Consultation Report**
- **Transport Statement**
- **Heritage Assessment**
- **Ecology Report**
- **Landscape and Visual Appraisal**
- **Landscape Concept**
- **Noise Impact Assessment**
- **Sustainability Statement**
- **Air Quality Impact Assessment**
- **Drainage Impact Assessment and Strategy, including Flood Risk Assessment**
- **Geo-Environmental Ground Conditions Report**

Subject to all of the above being supplied and supplemented where required through separate pre-application processes (which we understand to be forthcoming), it is considered that these will be generally sufficient to assess the effects of the development upon the environment during both the construction and operational phase.

Conclusions

The checklist above (which forms part of the Council's EIA Screening Opinion assessment) is a useful tool for the purposes of identifying the wide range of environmental receptors which could be affected by proposed development. From the assessment undertaken in accordance with the Regulations and Circular 01/2017, and taking into account the submitted screening report, the Council concludes that the proposed development at land to the north of Camsiscan Farm, is unlikely to result in effects on the environment which are sufficiently significant to require the submission of an environmental assessment, in so far as this assessment relates to those elements of the proposed development that are within South Ayrshire Council area or that impact on South Ayrshire Council area. On this basis, we can confirm that we do not consider it necessary for an EIA Report to accompany the forthcoming S36 application.

Notwithstanding the position set out above, the main issues which have emerged from our review of the proposals assessed against the checklist relate to the potential landscape and visual impacts of the development in a local sense noting its scale and mass and the fact it is to be located in a relatively rural and agricultural area which is otherwise free from this type of development. The reach and extent to which the development will be seen and visible from both within South Ayrshire Council and the neighbouring authority at East Ayrshire is another matter which raises further consideration, and this will require to be robustly addressed and quantified as part of the forthcoming S36 submission. As set out in the responses to the relevant sections of the checklist above, South Ayrshire Council expects to engage with the ECU and the applicant to establish a scope of visualisations which will be needed to support the LVIA that will accompany the future S36 application. We note the applicant's willingness to do this from the commentary within the cover letter and we would encourage them (once the suite of visualisation viewpoints is agreed), to include and present these through a formalised Zone of Theoretical Visibility (ZTV) as part of the LVIA.

In addition to this, we consider that it will also be necessary for any future S36 application to evidence and present a suite of mitigation and design features which have been/will be utilised to minimise the visual and landscape impact of the development in the local area. Whilst we have reached the conclusion that the scale and nature of the development in visual and landscape terms will not be significant in EIA terms, we still have concerns about its impact in a local sense and in particular we would strongly encourage the

applicant to carefully consider the heights of the development (10m and 15m in particular) and how it would sit within the immediate landscape. More specifically, we would request that the applicant explore options which could look to deliver a potentially lower density development (which we accept would result in the development being over a larger footprint area) as opposed to a more concentrated development of greater height and density which would be far more difficult to screen and mitigate.

As one final point, we would just reinforce the overall position taken above (e.g. No EIA Report required) is based on the series of commitment from the applicant to provide all of the supporting technical documents outlined in the information supporting this EIA Screening Opinion submission. We await contact from the applicant/ECU to engage in pre-application discussions which will provide an opportunity for us to provide specific comments on the different supporting technical documents so that we can ensure all relevant matters are captured. We consider that once all of this is agreed, this will ensure that in lieu of a formal EIA Report, sufficient environmental information is presented to consider the potential direct and indirect effects considered and specified in the checklist assessment above.