

FRIENDS OF DUCHESS WOOD COMMENTS ON NEED FOR ENVIRONMENTAL IMPACT ASSESSMENT FOR PLANNING APPLICATION 23/02472/PP – CONSTRUCTION AND OPERATION OF A BATTERY ENERGY STORAGE SYSTEM WITH ANCILLARY INFRASTRUCTURE DATED 22 DECEMBER 2023

References:

- A. YLEM EIA Screening Checklist dated Apr 24.
- B. The Town and Country Planning (Environmental Impact Assessment)(Scotland) Regulations 2017
- C. MyGov.Scot Environment Impact Assessment Guidance dated 21 Jul 22.

Following the publication of YLEM's EIA Screening the FODW have the following additional observations to make in addition to the submission forwarded on 21 March 2024.

In our first submission FODW requested that a full EIA be carried out due to the fact that the development is above the threshold for one and that it is next to an area having specific ecological designations. The YLEM EIA screening checklist has done nothing to either reassure us or to change our view that a full EIA should be conducted. and we are surprised, and disappointed, that YLEM concluded no EIA is required as we understood this was the mandate of the appropriate Planning Authority. In particular we are fully supportive of the observations made by Miss Xanne Janssen on 15 April in the inaccuracies in the information provided by YLEM To save Planners' time we will not repeat them here, but we are in full agreement with her response.

Additionally we wish to make the following comments.

- The site area is quoted as 0.51ha. However the proposed site plan (with water tanks) states the development has an area of 0.93ha which is compatible with the dimensions of the site quoted. This is significantly above the EIA threshold of 0.5ha.
- The Drainage Impact Assessment makes no mention of the two water tanks for provision of Firefighting water and how run off from this will be managed in the event of use (500,000 litres).
- The YLEM screening document quotes twice (1(f) and 1(g)) that, as set out in Appendix K, "the risk of fire will be minimised and measures put in place to ensure there is no risk to the environment and/or human health in accordance with the NFCC battery safety guidance". As several other correspondents have already commented the NFCC guidance has not been fully followed and we draw your attention to the detailed comments made by Martin Grafton in his objection dated 25 March.

There are sufficient inaccuracies in the YLEM Screening Checklist to call into question its validity and we remain of the view that a full EIA is required, and indeed mandated, by the Scottish Planning Regulations.