

PE2157/A: Update planning advice for energy storage issues and ensure that it includes clear guidance for the location of battery energy storage systems near residences and communities

Scottish Government written submission, 22 May 2025

In April 2025, the Scottish Government commissioned independent consultants Ironside Farrar to produce planning guidance on Battery Energy Storage Systems. We currently anticipate this work will be completed in the autumn. This will include discussions with stakeholders, including Heads of Planning Scotland and Scottish Fire and Rescue Service. We intend that the guidance will promote good practice in determining BESS applications as well as set out information on other relevant regulatory regimes applicable to BESS in Scotland.

There are existing and well-established consenting procedures for renewable energy and electricity grid infrastructure, including consideration of residential amenity and cumulative impacts.

Where battery energy storage system applications with a capacity greater than 50MW are brought forward, these will require consent from Scottish Ministers under the Electricity Act 1989. Applications below 50MW are determined under the Town and Country Planning (Scotland) Act 1997, as amended, and are primarily a matter for the relevant planning authority.

We published and adopted our fourth National Planning Framework (NPF4) in February 2023 following approval by the Scottish Parliament. NPF4 guides spatial development, sets out national planning policies, designates national developments and highlights regional spatial priorities. It is part of the development plan and so influences planning decisions across Scotland.

NPF4 places climate and nature at the centre of our planning system and makes clear our support for all forms of renewable, low-carbon and zero emission technologies. NPF4 Policy 11(Energy) states that potential impacts on communities, nature and other receptors will be important considerations in the decision-making process. Policy 11 requires that project design and mitigation demonstrate how impacts on communities and individual dwellings, including residential amenity, visual impact, and cumulative impacts will be addressed.

NPF4 policies must be read and applied as a whole and will be for the decision-maker to determine what weight to attach to policies on a case-by-case basis. All applications are subject to site-specific assessments.