

PE2157/D: 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

Minister for Public Finance written submission, 2 October 2025

Thank you for your letter to Gillian Martin MSP, Cabinet Secretary for Climate Action and Energy, on the above matter. Your letter was received on 11 September 2025 and has been passed to me in view of my portfolio responsibility for planning matters. I have responded to each of your questions below in turn.

- ***To ask for an update on the work to produce planning guidance on Battery Energy Storage Systems, including the Scottish Government's view on any initial recommendations.***

The Scottish Government has commissioned independent consultants Ironside Farrar to produce guidance to support planning authorities considering BESS applications. This is progressing and once completed we expect to publish the guidance this winter.

Although the guidance is not expected to make recommendations as such, it will provide best practice advice for developers from the earliest stages of siting and design, through to submitting a planning application. It will provide advice to all parties engaged in the application process, including planning authorities, statutory consultees, as well as communities who wish to further understand application procedures. In addition to setting out planning advice, the guidance will also contain information on regulatory controls in place through other statutory regimes including in relation to health & safety, fire risk, and pollution control. This will help to increase clarity for all concerned, and support more consistent decision-making.

The Scottish Government has also commissioned a study on the environmental impacts of BESS, the findings of which will be taken into account in the planning guidance.

- ***To ask for clarity on the Scottish Government's position regarding the concerns further highlighted by the petitioner's additional submission, particularly in terms of BESS proximity to the community.***

We recognise that there is concern in some communities over the scale and location of some BESS development.

Where new development proposals come forward, our [Fourth National Planning Framework](#) (NPF4) ensures the impacts of proposals on communities and nature, including cumulative impacts, are important considerations in the decision-making process. NPF4 Policy 11 (energy) requires that project design and mitigation demonstrate how the impacts of a development proposal on communities and individual dwellings, including through loss of residential amenity, visual impact and noise, will be addressed. All applications are subject to site specific assessments.

BESS projects in Scotland are required to adhere to a range of both devolved and reserved regulations including the following:

- Fire (Scotland) Act 2005
- Health and Safety at Work Act 1974
- Dangerous Substances and Explosive Atmospheres Regulations
- Electricity at Work Regulations 1989

Where the Scottish Fire and Rescue Service receive information about a proposed BESS site, they refer site operators to the National Fire Chief Council's Grid Scale Planning Guidance. These guidelines detail minimum standards for fire safety systems and design, and water and access requirements for firefighting.

I hope that the Committee finds this response helpful.

Yours sincerely,

Ivan McKee MSP

Minister for Public Finance