

Planning Application for a Proposed Battery Energy Storage System (BESS), Transformers, Substations and Associated Infrastructure

Land South of Eccles Substation, Scottish Borders, Scotland,
TD12 4LU

Addendum Planning Statement

On behalf of Bishops Dal Energy Storage Limited

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1. Introduction

- 1.1. This Supplementary Planning Statement has been prepared by Pegasus Group on behalf of Bishops Dal Energy Storage Limited (“the Applicant”) to provide further context to, and in support of, application made under Section 36 of the Electricity Act 1989 (“the Electricity Act”) for the installation of a battery-based electricity storage system, transformers, substations and associated development on land south of Eccles Substation, Scottish Borders, Scotland, TD12 4LU. The application was registered by the Energy Consents Unit (ECU) on 5 March 2025 (application reference: ECU00005049). The Site location is identified on drawing ref. O5389-RES-LAY-DR-PT-001 Rev.6.
- 1.2. This document should be read as an addendum to the previously submitted Planning, Design and Access Statement and Landscape and Visual Appraisal (LVA). It provides clarification and additional information in response to queries raised by Scottish Borders Council (SBC) during the consultation process. It follows a meeting held on 25 September 2025 between SBC officers, Pegasus Group, and RES.
- 1.3. Specifically, this Statement addresses the following key matters:
 - Access Strategy, including the deliverability of a shared access with the adjacent Zenobe site and the rationale for the proposed main and emergency access points.
 - Site Layout and Orientation, including design rationale and functional requirements in relation to land quality, topography, and grid connection.
 - Bund and Landscape Design, clarifying its purpose as a sustainable soil management measure and its contribution to long-term restoration and to provide visual mitigation.
- 1.4. The Supplementary Planning Statement aims to ensure that the ECU, SBC and other statutory consultees have a comprehensive understanding of the design evolution and its policy alignment ahead of determination.

Supporting Documentation

- 1.5. The following documents are submitted in support of the submission:
 - Access Strategy Technical Note; and
 - Cross Sections;

2. Background

- 2.1. A Section 36 application (application ref: ECU00005049) for the Bishops Dal Battery Energy Storage System (BESS) was registered in March 2025 following pre-application engagement with Scottish Borders Council and statutory consultees. The proposal remains consistent with the direction of national energy policy as set out within the UK Government's Clean Power 2030 Action Plan (2024), which sets out the pathway to delivering a secure, affordable, and decarbonised electricity system by 2030 and achieving a fully net-zero power sector by 2035.
- 2.2. The proposed development aims to provide local and national benefits including:
- Improved grid stability and energy security at a key transmission node (Eccles Substation);
 - Efficient use of existing grid infrastructure, reducing the need for new transmission reinforcement; and
 - Contribution to the decarbonisation of Scotland's electricity supply chain, consistent with the Clean Power 2030 Action Plan and its target to quadruple storage capacity across Scotland's grid network.
- 2.3. Accordingly, the proposal aligns with NPF4 Policies 1 (Tackling the Climate and Nature Crises), 2 (Climate Mitigation and Adaptation), and 11 (Energy), as well as LDP Policies EP5 (Special Landscape Areas) and ED9 (Renewable Energy Development). It represents the type of low-carbon, infrastructure-led investment envisaged by the Scottish Government's Clean Power Action Plan and contributes meaningfully to national objectives for a secure, flexible, and decarbonised electricity system.

3. Overview of Consultation Process

- 3.1. Following submission of the Section 36 application, consultation responses were received from all statutory and non-statutory consultees. The majority of technical consultees – including NatureScot, SEPA, Historic Environment Scotland, Scottish Water, NATS, BT, the Defence Infrastructure Organisation, and Transport Scotland have raised no objection.
- 3.2. The Leitholm, Eccles and Birgham Community Council submitted objections, citing concerns around cumulative landscape and traffic effects. These matters have been addressed through the Construction Traffic Management Plan (CTMP) and Construction Environmental Management Plan (CEMP) previously submitted as part of the Section 36 application. The accompanying Access Strategy Note, submitted alongside this document, provides further clarification on the site access arrangements and rationale, while landscape-related concerns are addressed within this document.
- 3.3. SBC officers have confirmed that the principle of development is acceptable, subject to the provision of supplementary information on access, layout, and landscape design. This aligns with the Council's spatial strategy to support renewable energy infrastructure in appropriate rural locations.

- 3.4. The current consultation SBC period runs until 4 November 2025. It is anticipated that the proposal will proceed to the SBC Planning and Building Standards Committee December 2025 for consideration and to finalise their consultation response as the local planning authority.

4. Access Strategy

- 4.1. A detailed Access Strategy Technical Note (TN) has been prepared by Pegasus Group on behalf of the Applicant to respond to comments raised by the Scottish Borders Council (SBC) Roads Authority and to provide further clarity on access design and safety considerations.
- 4.2. The TN demonstrates that a shared access with the adjacent Zenobe site is not deliverable due to lack of land ownership or legal control, and there is no mechanism to compel or secure shared use.
- 4.3. The Applicant has previously engaged proactively with the controllers of the adjacent site on other matters, however, it is not considered viable to secure any form of access rights or legal agreement that would enable joint use. This position was discussed and accepted in principle with SBC Roads and Planning officers during the meeting held on 25 September 2025, and the agreed approach is now reflected within the accompanying Access Strategy Technical Note.
- 4.4. The proposed access strategy delivers a clear net safety improvement by relocating the existing field access to a safer position with compliant visibility splays in accordance with the Design Manual for Roads and Bridges (DMRB) standards. The redundant field access will be closed and the verge reinstated, thereby reducing the number of access points onto the A697 and improving overall road safety.
- 4.5. An emergency-only access is also proposed, designed in accordance with the National Fire Chiefs Council (NFCC) guidance. This ensures safe alternative entry in the unlikely event of an emergency and is fully aligned with Scottish Fire and Rescue Service operational requirements.
- 4.6. In policy terms, the access design accords with NPF4: Policy 13 (Sustainable Transport), which seeks to ensure that development proposals support safe and efficient movement networks, and with LDP Policy IS6: Roads Adoption Standards, which requires new accesses to be safely designed. The proposed arrangement satisfies these objectives by providing a modern, policy-compliant junction design that enhances safety and functionality without increasing risk on the trunk-road corridor.
- 4.7. Overall, the access strategy represents a proportionate, policy-compliant solution that rationalises existing access arrangements, enhances road safety, and provides robust connectivity for construction and operational phases. The Applicant remains committed to ongoing engagement with SBC Roads throughout the process on management considerations.

5. Site Layout and Orientation

- 5.1. The design and orientation of the Bishops Dal BESS have been informed by an iterative process involving the applicant, RES, and Pegasus Group. This process balanced operational

efficiency, agricultural land protection, environmental sensitivity, and visual considerations, in accordance with NPF4 Policy 11: Energy and LDP Policies ED9: Renewable Energy Development and EP5: Special Landscape Areas.

- 5.2. During consultation, SBC queried the orientation of the BESS compound, and the Applicant was asked to give consideration to rotating the BESS compound by 90° could further reduce visual impact. The Applicant has revisited this matter, confirming that the current orientation provides the most balanced and environmentally responsive layout given the site's physical and operational constraints.
- 5.3. The primary driver of the orientation is the requirement for direct electrical connectivity with the existing Eccles Substation, located to the north-east of the site. The alignment of the BESS units, DNO substation and associated cabling corridors has been deliberately designed to ensure efficient routing, minimise excavation, and reduce ground disturbance. This not only supports technical efficiency but also reduces environmental impact during construction and operation.
- 5.4. The location of the compound has been carefully determined through a comprehensive assessment of site-specific constraints, including the presence of overhead utility lines, existing topography, acoustic considerations, third-party servitudes, and the potential for construction-related disruption. Each of these factors has influenced the final positioning and orientation of the compound to ensure a practical, safe, buildable outcome. Following detailed evaluation, the current layout and orientation are considered to provide the most balanced and optimal solution for both operational efficiency and environmental sensitivity.
- 5.5. The proposed design achieves a compact and efficient footprint, reducing overall land take and minimising areas of unused land within the red line boundary, and allows the farm owner to continue farming the northern area of the wider field. The alignment of tracks, access routes, and associated infrastructure not only improves functionality but also simplifies maintenance and potential future adaptations. Importantly, the layout has been designed in accordance with National Fire Chiefs Council (NFCC) guidance on emergency access, incorporating two separate access points to facilitate safe and efficient movement of emergency vehicles and site traffic.
- 5.6. Alternative layout orientations were explored during the design development process; however, these presented significant technical and environmental challenges. In particular, variations in topography made it difficult to avoid steep gradients in the southwest of the development site, which would have required extensive earthworks and environmental impact. Furthermore, the presence of sensitive noise receptors to the northeast of the site imposed additional design constraints. This orientation effectively minimises potential impacts during both the construction and operational phases, including noise, dust generation, and general disturbance. Furthermore, the configuration has been refined to limit encroachment on productive agricultural land, maintaining the viability of surrounding farmland wherever practicable. This careful balance of engineering, environmental, and social considerations reflects the decisions to locate the compound in its current location.
- 5.7. The land ownership and agricultural context have also been integral to the design process. The landowner expressed a clear preference for retaining as much prime quality agricultural land in active agricultural use as possible. While the overall site predominantly comprises Class 3.1 land, the current compound placement has been carefully selected to occupy a compact area within the southern part of the holding, adjacent to existing woodland at

Egerton Covert and Paxton Wood. This location minimises fragmentation of the wider field, allows the northern and eastern areas to remain in productive use, and makes effective use of existing visual containment.

- 5.8. Although a small area of lower-grade Class 5.3 land exists on the western boundary of the wider site, this area was discounted during design development due to local topographical and drainage constraints, restricted access, and its close proximity to existing woodland, where development would have required works within established tree root protection zones. By maintaining appropriate stand-offs from woodland and locating the compound on level ground capable of effective drainage, the selected site minimises earthworks and avoids unnecessary disruption to adjacent features.
- 5.9. On balance, the chosen location provides the most practical, environmentally responsive, and least disruptive arrangement, ensuring the project remains compatible with rural land-use objectives and consistent with NPF4 Policy 5: Soils and LDP Policy ED10: Protection of Prime Quality Agricultural Land & Carbon Rich Soils.
- 5.10. The site's topography and natural screening features further support the chosen orientation. The BESS has been positioned to take advantage of existing woodland and hedgerow boundaries that offer partial visual containment from key viewpoints, including the A697 corridor. The layout ensures that built elements are framed by existing vegetation, with supplementary planting proposed to enhance this screening effect over time.
- 5.11. Further alternative configurations were explored during the design process. However, these presented significant challenges, including:
- The need for longer or more complex cable runs, increasing ground disturbance and a reduction in overall system efficiency;
 - Encroachment onto prime agricultural land;
 - Reduced separation distances to residential receptors, potentially increasing noise and visual sensitivity; and
 - Greater visual exposure from the south-west, where topography rises towards the road network.
- 5.12. On balance, the current layout provides an optimal configuration that aligns with technical, landscape, and agricultural constraints, while maintaining a compact site footprint. It represents a proportionate response to site conditions and achieves a clear policy balance between renewable energy delivery, landscape protection, and efficient land use.

6. Bund and Landscape Approach

- 6.1. The proposed landscape bund has been designed as a multifunctional feature, serving both practical and environmental purposes. During consultation, SBC officers sought clarification on the bund's appearance and necessity. The applicant has since confirmed that the bund performs a dual role in sustainable soil management and landscape integration, providing a means to store and reuse topsoil while also delivering effective visual mitigation within the surrounding landscape.

- 6.2. From a sustainability perspective, the bund allows for the retention and re-use of soil material generated through construction. Rather than exporting this material off-site, which would increase vehicle movements, emissions, and disturbance, the soil is to be stored and shaped within the site boundary. This approach substantially reduces construction-phase traffic and carbon footprint, aligning with NPF4 Policy 2 (Climate Mitigation and Adaptation) and Policy 3 (Biodiversity), which promote resource efficiency and the minimisation of waste.
- 6.3. The retained soil also provides a significant long-term decommissioning benefit. At the end of the project's 40-year operational life, this material will be available for on-site restoration, allowing the land to be returned to agricultural use with minimal import of material. This closed-loop approach represents best practice in sustainable development and supports NPF4 Policy 11 (Energy) and LDP Policy ED10 (Protection of Prime Quality Agricultural Land & Carbon Rich Soils) in managing land responsibly over its full life cycle.
- 6.4. From a landscape and visual standpoint, the bund offers gradual and proportionate screening for the operational compound. The Landscape and Visual Appraisal (LVA) identified that the bund would assist in softening the appearance of the development without introducing new, discordant landforms. Over time, native planting on the bund will mature to enhance visual containment and biodiversity, integrating the feature naturally into its rural setting. The final profile of the bund can, of course, be subject to a planning condition for landscape details to be agreed prior to operation of the BESS.
- 6.5. Cross-sections (ref: 05389-RES-LAY-DR-PT-002) have been provided to illustrate the bund's function and appearance. These will include 'Year 1' and 'Year 10' scenarios to demonstrate the progressive landscape integration as vegetation establishes. This will enable the Council to visualise how the development's visibility reduces over time, consistent with standard LVA methodology and the approach endorsed by the Council's landscape team.
- 6.6. The bund has been carefully designed to follow the site's existing contours as far as possible, avoiding harsh geometric forms. Its scale and shape have been informed by cut-and-fill analysis prepared by RES's engineering team to ensure the bund appears naturalistic and proportional. This design response reflects the comments raised by SBC officers and ensures that the bund complements, rather than competes with, the surrounding landform.
- 6.7. In policy terms, this approach exemplifies the principles of sustainable landscape design advocated under NPF4 Policies 2 and 11, as well as LDP Policies EP3: Local Biodiversity & Geodiversity and EP5: Special Landscape Areas. The bund therefore functions as an integral part of the overall design solution, offering clear environmental, visual, and operational benefits across the full project life cycle.
- 6.8. Taken together, the landscape and soil management approach demonstrate that the proposal has been comprehensively designed and forward-planned — not only to minimise its immediate impact but to facilitate responsible restoration and sustainable land use over time. It is a proportionate and well-considered solution that underpins the policy compliance and long-term integrity of the development

7. Conclusions

- 7.1. This Supplementary Planning Statement provides clarification and supporting information in response to consultation feedback from SBC and other consultees. It demonstrates that the Bishops Dal BESS continues to represent a well-considered, sustainable, and policy-compliant form of renewable energy infrastructure.
- 7.2. The information presented confirms that the principle of development is acceptable, as acknowledged by SBC officers, and that all remaining technical and design matters can be addressed proportionately through this supplementary evidence and ongoing dialogue.
- 7.3. In particular:
- The Access Strategy confirms that a shared access is not achievable but that the proposed arrangement provides a safer, policy-compliant solution that rationalises existing field entrances and delivers tangible road safety benefits.
 - The Site Layout and Orientation are derived from technical, agricultural, and environmental constraints, ensuring efficient grid connectivity, protection of prime quality agricultural land, and effective use of the site's natural screening and topography.
 - The Bund and Landscape Approach provides a sustainable, long-term solution to soil management and restoration, minimising construction traffic, supporting biodiversity and visual integration, and enabling future reinstatement without excessive vehicle movements or off-site disposal.
- 7.4. Together, these refinements reflect a project that has been carefully designed to align with both national and local planning objectives. The proposal directly supports the ambitions of the Climate Change (Scotland) Act 2019, the Clean Power Action Plan (2024–2030), and NPF4, particularly Policies 1 (Tackling the Climate and Nature Crises), 2 (Climate Mitigation and Adaptation), 5 (Soils), and 11 (Energy).
- 7.5. From a development plan perspective, the proposal continues to comply with key Local Development Plan policies, including Policies EP5: Special Landscape Areas, ED9: Renewable Energy Development and ED10: Protection of Prime Quality Agricultural Land & Carbon Rich Soils. The approach taken responds positively to the Council's comments, demonstrating environmental responsibility, landscape sensitivity, and design integrity.
- 7.6. The supplementary information — including the Access Strategy Note, Landscape Sections (Year 1 and Year 10), and this addendum — is considered to provide SBC with the necessary evidence to address their concerns and to not object to the S36 application. The applicant remains committed to ongoing engagement with the planning and roads teams to finalise these elements.
- 7.7. The development represents a sustainable, technically robust, and policy-aligned investment in Scotland's renewable energy infrastructure and should therefore be supported accordingly.
- 7.8. Given the constructive dialogue and the Applicant's proactive response to all consultation feedback, it is considered that the proposal is now ready to be determined. This includes



SBC considering the S36 consultation at the December 2025 Planning and Building Standards Committee.

Electricity Act 1989

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