

PE2157/C: 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

Communities Against Cockenzie BESS written submission, 27 August 2025

Communities Against Cockenzie BESS (CACB) is a campaign group comprising local people who are highly concerned about the risks of locating this BESS so close to people, as described below. Members of CACB are not contesting the Scottish Government's stated move to renewables and the rationale for energy storage. Our issues of concern relate particularly to health and safety issues regarding the specific location of the Cockenzie BESS site. Our campaign group includes scientists and professional health & safety experts, and we are committed to providing accurate, factual information. We have produced well-researched information leaflets which we would be happy to share.

The following sources add to those provided to the committee in the SPICe briefing of 19 June 2025. I have shared this with the researcher concerned, who found it useful and recommended that we offer it to you for your consideration:

- The [Electric Power Research Institute's 'Failure Incident Database'](#) which provides a world-wide database of BESS fire incidents
- The [UK Government's 'BESS Health and Safety Guidance for Grid Scale Electrical Energy Storage Systems'](#), which was published in June 2024. See particularly pages 15-16 (BESS Risk Assessment) where it states that releases of toxic gases 'pose a serious risk to the immediate vicinity of any BESS'.

Despite these risks, there is no official guidance regarding location of BESS sites, including safe proximity to residences, thus allowing developers to self-regulate. This is a grave cause for concern. Meanwhile, the Scottish Government's submission to this petition states that they have commissioned an independent consultant (Ironsides Farrar) to produce BESS planning guidance, which clearly confirms that current guidance is not yet adequate.

Yet, in spite of the lack of rigorous guidance, including lack of guidance on minimum distance from communities, the Scottish Government's Energy Consents Unit recently gave consent to a number of BESS sites, including a large one in Cockenzie in East Lothian. This site is exceptionally close to residences, a children's playpark, a primary school and medical centre. As highlighted in the petition notes, some developers have guidelines which would preclude them from developing on the Cockenzie site. And yet this ECU decision gives consent to a site considerably nearer than other developers would allow.

In itself, it is unacceptable that the recent consent for the BESS sites were published during parliamentary recess time, thus restricting the degree to which they can be challenged by Members of the Scottish Parliament.

Furthermore, there is no guarantee that safe proximity to local residences will be included in the consultant's report.

All of this clearly contradicts the Scottish Government's Just Transition policy.

Conclusion

This is a critical time for the exploration of this decision. Local communities are scared and angry about the very real risks of locating large BESS sites close to housing and amenities. There are so many examples in recent years of preventable 'high risk, low probability' disasters having been caused by governments allowing industry to self-regulate safety measures, due to over-riding policy and financial pressures. This is an opportunity to provide adequate guidance now on safe proximity of BESS sites to residences, in order to ensure that a preventable BESS-related disaster does not happen in Scotland.