

THE HIGHLAND COUNCIL

**CAITHNESS PLANNING, DEVELOPMENT, EUROPE AND
TOURISM COMMITTEE – DEVELOPMENT CONTROL**

22 January 2007

Agenda Item	2.11
Report No	C/P/11/ 07

**DEVELOPMENT OF INTERMEDIATE LEVEL WASTE CEMENTATION PLANT AND
STORE, EXPORT FACILITY FOR CONTAMINATED MATERIAL, CASK STORE, AND
TEMPORARY MODULAR ACCOMMODATION (PHASE 1 – 2010) AT UKAEA,
DOUNREAY, THURSO, CAITHNESS.
06/00420/OUTCA**

Report by Director of Planning and Development

SUMMARY

This outline application relates to the construction of three buildings that are key to the ongoing decommissioning of the Dounreay site. These buildings are the final major developments within the 2005 – 2010 (Phase 1) period identified within the Dounreay Planning Framework (January 2006). The largest is the intermediate level waste cementation plant and store, designed to immobilise and encapsulate intermediate level wastes (ILW) and provide for their secure storage until such time that a national repository is available. Secondly, an extension to the existing ILW store within the fuel cycle area will enable 5,500 drums to be moved to the new intermediate waste cementation plant for processing. Finally, a cask store is proposed to securely store fuels until such time that these can be transferred off site for reprocessing or disposal. The application is accompanied by an Environmental Statement.

One representation has been received relating to the location of the waste cementation plant and store and inconsistencies between applications with regard to coastal erosion. Although not objecting, the Community Council also refer to coastal erosion as a concern. There are no objections from statutory consultees. The projects are fully supported in principal by both SEPA and NII.

Both the cask store and export facility are relatively modest in size and as they are to be built in an industrial setting, will have no unacceptable visual impact subject to the approval of detailed design. The much larger waste treatment facility is likely to be more visually prominent. However, only the store section of the building will remain on site over the longer term. Overall the developments will have no significant adverse impact upon the environment. The differences in choice of site for the ILW store and the LLW project is that the ILW materials will be removed from their location for emplacement within a national repository within 100 years. LLW is not intended to be retrieved. Coastal erosion is therefore more critical to the latter project.

The proposals are in accordance with The Highland Structure Plan and The Caithness Local Plan. Approval is recommended.

Local Member: Alastair MacDonald

1.0 PROPOSAL

- 1.1 This outline application relates to the development of three key buildings required for the on-going decommissioning work during the period 2005-10 (Phase 1). These buildings are; a new intermediate level waste (ILW) cementation plant, a new cask store, as well as an export facility for contaminated material. The application also seeks outline consent for temporary office accommodation.

Waste Cementation Plant and Store

- 1.2 The waste treatment facility includes a liquid waste treatment plant, a solid waste encapsulation plant, a shielded store, and a 20m high chimney stack. Although no detailed design information has been submitted it will be a large building, a maximum of 78m long, 62m wide and 18m high, and located at the north end of the main on-site car park, immediately south of the boiler house and east of the liquid ILW store located within the fuel cycle area (FCA).
- 1.3 Liquid waste will be transferred to the waste treatment facility from nearby underground tanks using a lift station and transfer via a gravity pipeline in a shielded duct that will cross Street 5 from the fuel cycle area to the new facility.
- 1.4 The immobilised and encapsulated products from the plant will be contained within 500 litre NIREX approved stainless steel container drums and placed in the shielded store, which has capacity for 6000 container drums, pending provision of a national repository. The store will have a design life of 100 years.

Export Facility

- 1.5 The proposed export facility will be attached to the existing ILW store building located within the FCA. It will have a floor area of no more than 1000sqm. Although no design details are provided it is likely to be a fully vented building with a loading bay.
- 1.6 This facility will allow the existing 5,500 drums of solid waste contained within this store building to be moved for conditioning in the waste cementation plant described above.

Cask Store

- 1.7 The proposed cask store is an entirely new building also proposed for within the FCA complex. Again no details have been submitted of the detailed design. However, it is expected to be a modest building with a footprint of around 50m x 30m.
- 1.8 The purpose of the cask store is to provide secure protection for redundant fuel. This fuel will be stored in casks until transported to another site for reprocessing or long-term storage.

Temporary Accommodation

- 1.9 The applicant also seeks consent in outline for temporary modular office type accommodation. Again this will be located within the FCA complex. It is expected that up to as many as 40 modular units will be required each with a floor area of 30sqm. This is

to accommodate up to 100 displaced workers.

1.10 The applicant is UKAEA.

2.0 SITE DETAILS AND BACKGROUND

2.1 The application site lies within the UKAEA Dounreay facility situated on the north Caithness coastline near Thurso.

2.2 There is considerable history associated with Dounreay, with the DFR becoming the first fast breeder reactor in the world to produce electricity. The DFR ran from 1959 until 1977. A larger model, the Prototype Fast Reactor (PFR) ran from 1974 until 1994 when the fast reactor programme at Dounreay ended. In the late 1990's the decision was taken to decommission and restore the Dounreay site.

2.3 In October 2000 UKAEA published the Dounreay Site Restoration Plan (DSRP) which provides an overview of the entire restoration process. The goal of DSRP is to restore the environment of the site in a way which is safe and secure, environmentally responsible, provides value for money and is acceptable to the public.

2.4 With the establishment of the Nuclear Decommissioning Authority (NDA), UKAEA has reworked the DSRP into the Dounreay Site Restoration Strategy (DSRS) and the Lifetime Plan (LTP). To secure on a phased basis the necessary grants of planning permission, the decommissioning and restoration plan has been aligned into three development phases, the first of which is Phase 1 for the period 2005-10.

2.5 Most recent and relevant applications include:-

18.02.2005 - Demolition of building D1110 and erection of building to be used as a facility for the removal and treatment of breeder fuel from the Dounreay Fast Reactor approved (04/00363/FULCA).

28.05.2004 - Erection of a conditioned waste store for intermediate level radio-active waste with transfer facility and associates office accommodation approved (03/00515/OUTCA).

03.10.2003 - Amended application for continued consent to store low level waste in existing building for a further 10 years approved (03/00264/FULCA).

08.07.2003 - Erection of steel portal framed building for processing of aqueous liquids generated by de-commissioning activities and for use as a process plant approved (03/00205/FULCA).

17.06.2003 – Erection of two portal steel framed buildings over low level waste pits 3 & 4 for a period of ten years for use as a facility for the handling and storage of low level nuclear waste approved (03/00015/FULCA).

21.05.2003 - Extension to building D1115 comprising steel structural frame with brick and metal cladding, for use as storage vault for radioactive contaminated components and partial demolition of D1110 approved (03/00174/FULCA).

13.04.2003 – Erection of nuclear waste transfer building approved (03/00038/FULCA).

16.02.2001 - Erect steel portal framed building over sub base foundation for the temporary storage of low level waste approved (Approx. 900 HHISO containers) (00/00354/FULCA).

2.5 Members should also be aware of the application for the new low level waste facility that was submitted on 30 June 2006 (06/00373/OUTCA). This lies outwith the current site boundary to the east of the site.

3.0 PUBLIC PARTICIPATION

3.1 The application was advertised in the in the John O’Groat Journal and the Edinburgh Gazette on 04 August 2006 as an application accompanied by an Environmental Statement, as a ‘bad neighbour’ development, and as a potential departure from the development plan.

3.2 1 letter of objection has been received from Mr J Webster, Rhana, Buldoo, Dounreay. The issues raised are:

1. Inconsistencies with regard to predicted sea level rise between this application and that for the low level waste repository.
2. The location of the building will be restrictive to the future use of the site.

3.3 The full text of this letter is available to view at the Planning and Development Service at Headquarters and the Caithness Area Planning and Building Standards office.

4.0 SUPPORTING INFORMATION

4.1 Information has been submitted in support of this application. This comprises of an Environmental Impact Assessment, Planning Statement and Sustainable Design Statement. These are available to view at the Planning and Development Service at Headquarters and the Caithness Area Planning and Building Standards office.

5.0 CONSULTATIONS

5.1 Caithness West Community Council appreciates that no decision has been taken regarding the storage of Intermediate Level Waste (ILW) nationally and for that reason appreciates that the present application is necessary. However, a parallel could be drawn with the proposed Low Level Waste facility in that there is a need to build this ILW storage with potential sea rise and coastal erosion rates in mind.

5.2 Scottish Environment Protection Agency has no planning comments on radioactive aspects of the proposal and advise that the Council’s contaminated land section be consulted for advice on assessment and remediation of historical land contamination issues.

5.3 Scottish Water has no objection.

5.4 Scottish Natural Heritage has no objection subject to conditions.

5.5 Health and Safety Executive – Nuclear Installations Inspectorate (NII) has no objection.

- 5.6 Historic Scotland is content that there will be no direct impacts on scheduled monuments within the site.
- 5.7 Scottish Executive Environment Group – Climate Change and Air Division has no comments to offer.
- 5.8 Council Emergency Planning Officer has not responded.
- 5.9 TEC Services - Roads and Community Works note that the proposal will lead to accelerated damage to the road network which will increase the rest of repairs to the carriageway especially to the A836.
- 5.10 TEC Services – Environmental Health has not responded.
- 5.11 TEC Services – Environmental Health (Contaminated Land) has no objections subject to conditions.
- 5.12 Council Archaeologist has not responded.

6.0 PLANNING POLICY

6.1 The Highland Structure Plan

Policies G1-G8 – General Strategic Policies

Policy W8 – Dounreay decommissioning and remediation (including paragraph 2.17.20)

Policy W10 – Import of nuclear waste material (including paragraphs 2.17.21-22)

Members will be aware that the Scottish Ministers neither approved nor rejected paragraphs 2.17.20-22 or Policies W8 and W10. These policies and paragraphs state the Council's position on Dounreay.

6.2 The Caithness Local Plan

Primary Policy PP2 – General Policy

Landward Policy 23 (Chapter 4) – Dounreay

6.3 Dounreay Planning Framework

Adopted in January 2006, the Dounreay Planning Framework supports the policies contained within the Caithness Local Plan 2002. Its purpose is to translate the decommissioning and restoration programmes outlined within the Dounreay Site Restoration Plan (DSRP) 2000 into a land use planning framework for the timely, safe and environmentally acceptable decommissioning, restoration and after use of the Dounreay site.

The three key projects that form part of this application are identified within Phase 1 covering the period 2005-10.

6.4 National Planning Policy Guidance 10 – Planning and Waste Management

While NPPG 10 specifically excludes Radioactive Waste Management Policy from its guidance, it does contain some general reference to the relationship between planning and pollution control. Paragraph 36, for example, states that *'the primary concern for planning is the use of land. Pollution control will be for SEPA to regulate.'*

Planning controls should not duplicate other statutory controls or be used to secure objectives that are achievable under other legislation. Planning authorities should not therefore substitute their own judgement on pollution control issues for that of SEPA, which has the relevant expertise and statutory responsibility for that control.

6.5 Review of Radioactive Waste Management Policy - Final Conclusions, HMSO, July 1995 (Cm 2919).

This is the current statement of Government policy concerning radioactive waste management.

Cm 2919 recognises that no fixed deadline can be placed on the provision of a UK repository for disposal of ILW. This waste will require to remain in interim storage for some time to come. It also acknowledges the possible requirement in safety terms to treat wastes appropriately to optimise safety and to avoid foreclosing future treatment and disposal options.

6.6 Committee on Radioactive Waste Management (CoRWM)

In 2003, the UK Government appointed an independent committee – Committee on Radioactive Waste Management (CoRWM) - to consult and recommend a long-term solution (or solutions) for the future management of UK intermediate and high level wastes. CoRWM made its recommendations to Ministers in July 2006.

CoRWMs main recommendation is that geological disposal is the best option to deal with the UK's radioactive waste. However, CoRWM also recognises that this may take some time to implement and therefore advocate the need for interim storage. In October 2006, Government responded to CoRWM indicating broad support for its recommendations. This will inform a new policy statement in due course.

7.0 PLANNING APPRAISAL

7.1 Under Sections 25 and 37(2) of the Town and Country Planning (Scotland) Act 1997, a decision upon an application for planning permission should be made in accordance with the Development Plan unless material considerations indicate otherwise.

Determining Issues

7.2 The determining issues are:

- Do the proposals comply with the development plan?
- If they do, are there any compelling reasons for not approving them?
- If they do not, are there any compelling reasons for approving them?

Assessment

- 7.2 In order to address the determining issues Members must consider whether the proposals a) are acceptable in principle, b) are of an acceptable visual impact and design quality, c) will have no adverse impact upon the cultural heritage of the area, d) will have no significant adverse impact upon ecology, air quality, or the amenity of neighbouring occupiers, e) are located well taking into account climate change, and f) address ground contamination.

Principle

- 7.3 Scottish Ministers reserved approval of the Highland Council Structure Plan policies relating to nuclear waste. However, current government policy in Cm 2919, in so far as it applies to ILW, is consistent with the Council's position which is that nuclear waste should be stored and managed on site at Dounreay to allow it both to be monitored and retrieved. This also conforms to CoRWM's recommendations regarding interim storage. Fuels are not considered to be a waste product at present.
- 7.4 The proposed developments are identified within the Dounreay Planning Framework as being key elements of the decommissioning up to 2010. The buildings are fundamental to the continued decommissioning of the Dounreay site as identified in the Dounreay Site Restoration Strategy (DSRS).
- 7.5 The proposed waste treatment plant is a fully integrated facility for treating liquid and solid intermediate level waste (ILW) that will allow the waste to be safely stored on site pending provision of a national repository. The export facility will allow for the repackaging and storage of existing ILW within the site, and the cask store will enable fuels to be stored in a safe manner pending off-site reprocessing or storage. These developments are therefore consistent with national as well as Council policy.
- 7.6 In view of this, the proposals are considered acceptable in principle.

Design Quality and Visual Impact

- 7.7 The application is in outline. No detail of the final form of any building has been submitted. However, it is anticipated that the cask store building will be of a size that will enable it to fit well with the existing scale and style of buildings in the fuel cycle area. The export facility as an extension of an existing modern store will have a relatively minor visual impact. Of all the buildings it is the waste treatment plant building that is likely to have the greatest visual impact.
- 7.8 The artist impressions illustrate a building of significant scale, with an overall height of up to 18m – or around five storeys. This is considerably higher than most buildings on the site which are around three storeys. Having said this, it is located directly to the south and east of the DFR sphere which at 41m in height is greater than twice the height of the proposed building. The DFR sphere is the dominant focal point in this industrial landscape. The proposed building is likely to detract from this given its scale, but the dome will remain visible from most viewpoints. The change in view, while significant is not considered significantly detrimental. The impact can be mitigated to some extent by the detail design.
- 7.9 In terms of cumulative visual impact, the proposed developments would be viewed

alongside many recent warehouse type structures as well as much of the older building stock on the site. Many of the older structures are being replaced by new development or open space as decommissioning progresses. While the developments proposed will alter the existing industrial landscape, this landscape is continually evolving and it is therefore not considered that there will be any adverse cumulative impacts on visual amenity.

Cultural Heritage

- 7.9 There are 32 known archaeological sites within the Dounreay area. Thirteen of these are within the UKAEA licensed site. One lies within the footprint of the waste cementation plant. However this is likely to have been destroyed by previous development on the site. While the Council Archaeologist has not responded, it is considered prudent for the site to be monitored for archaeology.
- 7.10 There are three Scheduled Ancient Monuments within the area, the closest of which is Dounreay Castle situated 450m to the south west of the site. It is not considered that the proposals will have any adverse impact upon this monument. Views from the scheduled monument Cnoc Friecadain at Hill of Shebster will be altered by the scale of the proposed cementation store, but as expressed above this view will be constantly changing. Subject to the selection of appropriate colour schemes, Historic Scotland has no objection.
- 7.11 Whilst there are no listed buildings within the site many of the existing building on the site, and in particular the DFR sphere, are of value to the industrial heritage of Scotland. At present UKAEA intend to retain the sphere and associated buildings in the hope that these will be listed at some point in the future. The impact upon this structure will be limited over the medium to longer term, particularly as, if retained as a listed structure, the proposed cementation plant and possibly store is likely to have been removed from the site by around 2050.

Ecology, Air Quality and Amenity

- 7.12 The UKAEA Dounreay site contains habitat and animal populations of local and national importance. However, the proposed building sites are of little ecological value in themselves.
- 7.13 Proposed operations within the cementation plant will result in the release of a small quantity of radioactive substances from the facility stack. UKAEA state that discharges associated with this project will be low. This is also true of discharges to the environment when considered cumulatively. Discharge of radioactive waste and gas at Dounreay is authorised under the Radioactive Substances Act (RSA) for which the Scottish Environment Protection Agency (SEPA) has overall regulatory responsibility.
- 7.14 Neither the Scottish Environment Protection Agency nor Scottish Natural Heritage has raised any concern with regard to ecology, air quality or climate. There is therefore no reason to conclude that the proposal will have any significant adverse effect upon ecology or air quality.
- 7.15 Given that plant will be enclosed within buildings and that the nearest dwelling from the site is approximately 1km distant, neither the operation nor construction of any of these facilities will have any significant adverse impact upon general amenity with regard to

noise or dust pollution.

- 7.16 It is estimated that during construction there will be an additional 2000 HGV vehicle movements per annum for the period 2007-2010 on the public road network. The Roads and Community Works Manager notes that the proposal will lead to accelerated damage to the road network. However this equates to only around 8 additional HGV vehicle movements a day. Once in operation, the only additional traffic generated is estimated to be the 72 lorry trips required per annum to transport the drums and cement material. In view of this, it is considered that the traffic impact of the proposal overall will be minimal.

Climate Change and Site End State

- 7.17 The proposed ILW store that forms part of this application is designed to last for 100 years. This is because it is currently anticipated that a national ILW repository will be ready to accept waste within 40 to 50 years. The location of the store is therefore not as critical with regard to climate change as other facilities such as the new Low Level Waste facility proposed to the east of the current licensed site. Although possible, it is not intended that LLW will be retrieved with some waste remaining active for around 300 years.
- 7.18 Mr Webster considers that the location of the proposed cementation plant and store compromises the future use of this part of the site. It would of course be better if all long term waste facilities were located together so that the majority of the site was left available for future use at the earliest opportunity. However, it needs to be acknowledged that treatment of the wastes as close to possible to their current location is the safer option. Only a relatively small store building will remain on this site at the current site end point of 2033.

Contaminated Land

- 7.19 Radiological control over the site and control of pollution are the responsibility of NII and SEPA respectively. These are not matters for the Planning Authority. The buildings subject to this application will be designed to minimise the potential for accidental release of contaminants.
- 7.20 The ground on which the buildings are to be constructed may be contaminated from both radiological and chemical sources. With regard to the cementation plant, the applicant concludes that the level of risk to human health is insignificant at near surface. The level of contamination, if any, is unknown in the other locations. The Planning Authority has a responsibility to ensure that proposed buildings are 'suitable for use.' It is considered that this can be adequately controlled by condition.

8.0 CONCLUSION

- 8.1 The three projects applied for under this application are key to the continued decommissioning of the Dounreay site. The developments sit firmly within Phase 1 of site decommissioning identified in the Dounreay Planning Framework (2006) and conform to both national and development plan policy.
- 8.2 Subject to mitigation and conditions, the project will have no significant adverse impact upon the environment. There are no fundamental objections by consultees. The location of

the proposed cementation plant and store is not considered to compromise the longer term site end use albeit that the store is likely to remain after the site interim end point at 2033. As it is not proposed to store any ILW material for more than 100 years in this particular facility, coastal erosion will not be an issue.

- 8.3 In summary, the development accords with the development plan and there are no material considerations to indicate otherwise.

RECOMMENDATION

GRANT OUTLINE PLANNING PERMISSION, subject to the following conditions:

1.
 - 1a Prior to the commencement of development of the ILW Cementation Plant & Store, Cask Store, Export Facility and Modular Accommodation the prior approval of the Planning Authority must be obtained for the details of the siting, design and external appearance of the buildings, the means of access and landscaping. These are reserved matters to this outline permission.
 - 1b Plans and particulars of the reserved matters referred to in condition 1a above shall be submitted for consideration by the Planning Authority and no work shall begin until the written approval of the authority has been given.
 - 1c Application for approval of reserved matters shall be made to the Planning Authority within 5 years from the date of this permission.
 - 1d The development hereby permitted shall commence within 7 years from the date of this permission or within 2 years from the date of approval by the Planning Authority of the last of the reserved matters.

Reason: This application is in outline only and no such details have been submitted.

2. The development hereby approved shall be carried out in accordance with the planning application and plans hereby approved, and with respect to any condition that requires the written approval of the Planning Authority in accordance with that approval, unless subsequently otherwise agreed in writing by the Planning Authority.

Reason: To ensure that the development is carried out in accordance with the approved plans.

3. Prior to the commencement of development, a scheme to deal with potential contamination on each development site shall be submitted to and approved in writing by the Planning Authority. No construction work must commence until the approved scheme has been implemented to the satisfaction of the Planning Authority. The scheme shall contain details of proposals to deal with potential contamination and must include:
 - a) The nature, extent and type of contamination on site, identification of pollutant linkages and assessment of risk (i.e. Contaminated Land Risk Assessment and Remediation Plan). The scope and method of assessment to be agreed in advance with the Planning Authority, and undertaken in accordance with PAN 33 and BS10175:2001.
 - b) Remedial strategy (if required) to treat/remove contamination to ensure that the site is fit for the uses proposed (this shall include a method statement, programme of works, and proposed verification plan).

- c) Submission of a Validation Report (should remedial action be required) by the competent person employed by the developer who will validate and verify the completion of the works to a satisfactory standard as agreed with the Planning Authority.
- d) Submission, if necessary, of monitoring statements at periods to be agreed with the Planning Authority for such time period as is considered appropriate by the Planning Authority.

Written confirmation from the Planning Authority that the scheme has been implemented; completed and if appropriate, monitoring measures are satisfactorily in place, shall be required prior to the commencement of work on site.

Reason: To ensure potential risks arising from previous site uses have been fully assessed and that contamination within the site is adequately dealt with.

- 4. Prior to the commencement of development, a programme of archaeological work for the preservation and recording of any archaeological features affected by the proposed development, including a timetable for investigation, shall be submitted to and approved in writing by the Planning Authority.

Reason: To safeguard sites of archaeological interest.

- 5. Prior to the commissioning of the ILW Cementation Plant & Store, Cask Store, Export Facility and Modular Accommodation, the Dounreay Off-Site Emergency Plan shall be reviewed and, if appropriate, updated in compliance with the Council's obligations under the Radiation Emergency Preparedness and Public Information Regulations 2001 (REPPPIR).

Reason: To discharge the Council's obligations under REPPPIR.

- 6. Sewage or trade effluent, including cooling water containing chemical additives, vehicle wash waters, steam cleaning effluent or pressure wash effluent, should only be discharged through an authorised water treatment system.

Reason: In order to reduce the possibility of surface water contamination.

- 7. Any above ground oil storage tank(s) or chemical storage tank(s) should be sited on an impervious base and surrounded by a suitable liquid tight bunded compound or be double skinned. The bunded area should be capable of containing 110% of the volume of the largest tank and fill pipes, draw pipes and sight gauges should be enclosed within its curtilage. The provision on site of oil spill kits shall be made at all times during the construction of the development.

Reason: In order to reduce the possibility of pollution during construction.

- 8. The ILW Cementation Plant and Store together with all waste stored therein, shall comply with the response by Government and the Devolved Administrations to the report and recommendations by CoRWM on the long term management of the UK's radioactive wastes. In particular, that geological disposal coupled with safe and secure interim storage is the way forward for the long term management of the UK's higher activity wastes.

Reason: To ensure compliance with national policy.

- 9. All conditioned ILW shall be retrievable over the anticipated life-span of the building and shall comply with all necessary Government standards of packaging consistent with future disposal in a long term geological repository.

Reason: To ensure compliance with national policy.

10. Only intermediate level nuclear wastes previously stored on the Dounreay site or arising from operations at the site or HMS Vulcan shall be stored in the ILW Cementation Plant.

Reason: For the avoidance of doubt, to clarify the terms of permission.

Signature:

Designation: Director

Author: David Mudie, Team Leader – Development Control (01463) 702255

Date: 15 January 2006

Ref: 06/00420/OUTCA

Background Papers: Case File
Supporting Information

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- Legend**
- New Construction
 - Demolition
 - Current Buildings
 - Sub Surface Facilities
 - Tenanted Land
 - Private Land
 - Houses
 - Landfill 42
 - Perimeter Fence
 - Site Boundaries
 - Faults

Abbreviations

LLW - Low Level Waste
 LA/HV - Low Active/High Volume

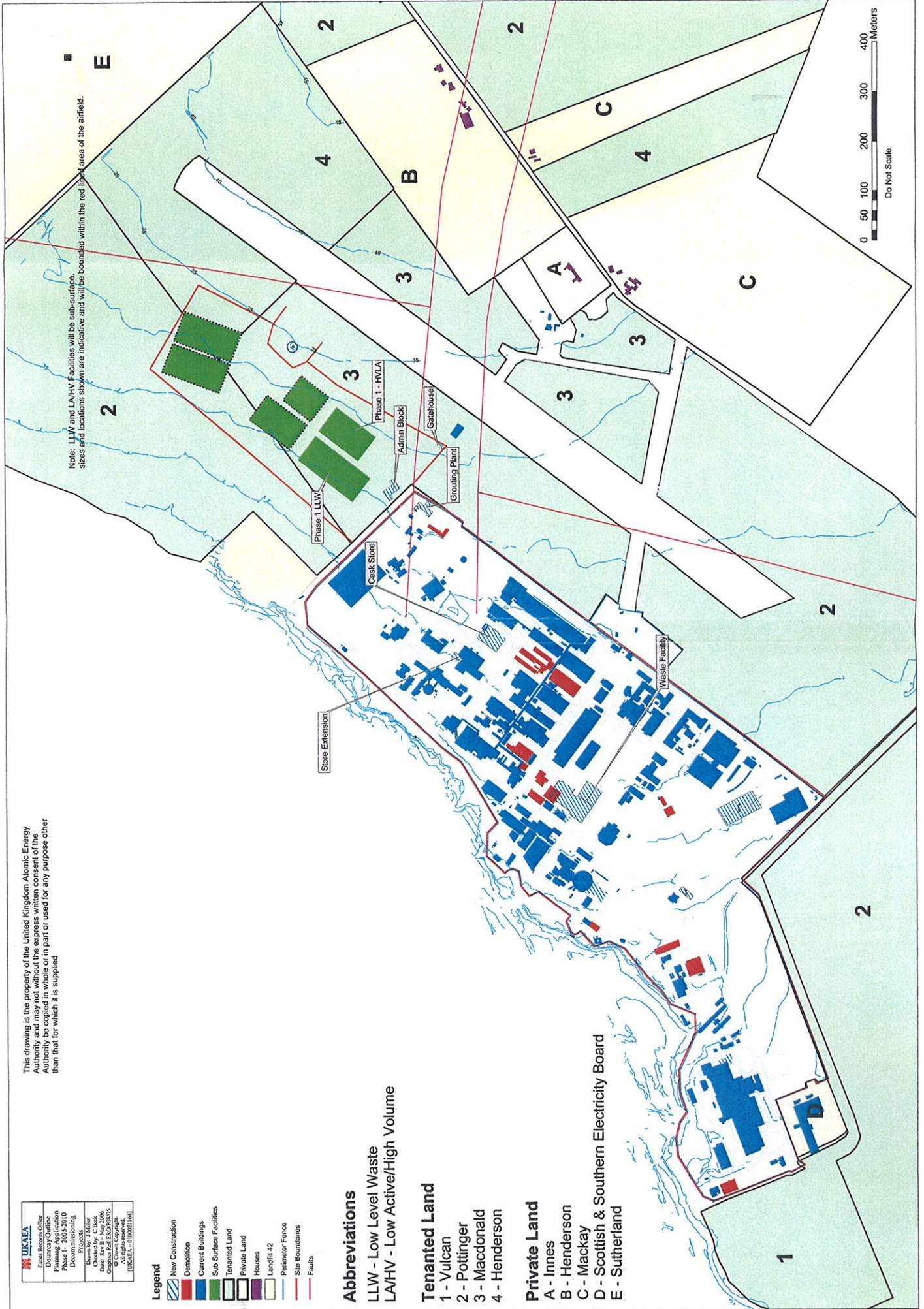
Tenanted Land

- 1 - Vulcan
- 2 - Pottinger
- 3 - Macdonald
- 4 - Henderson

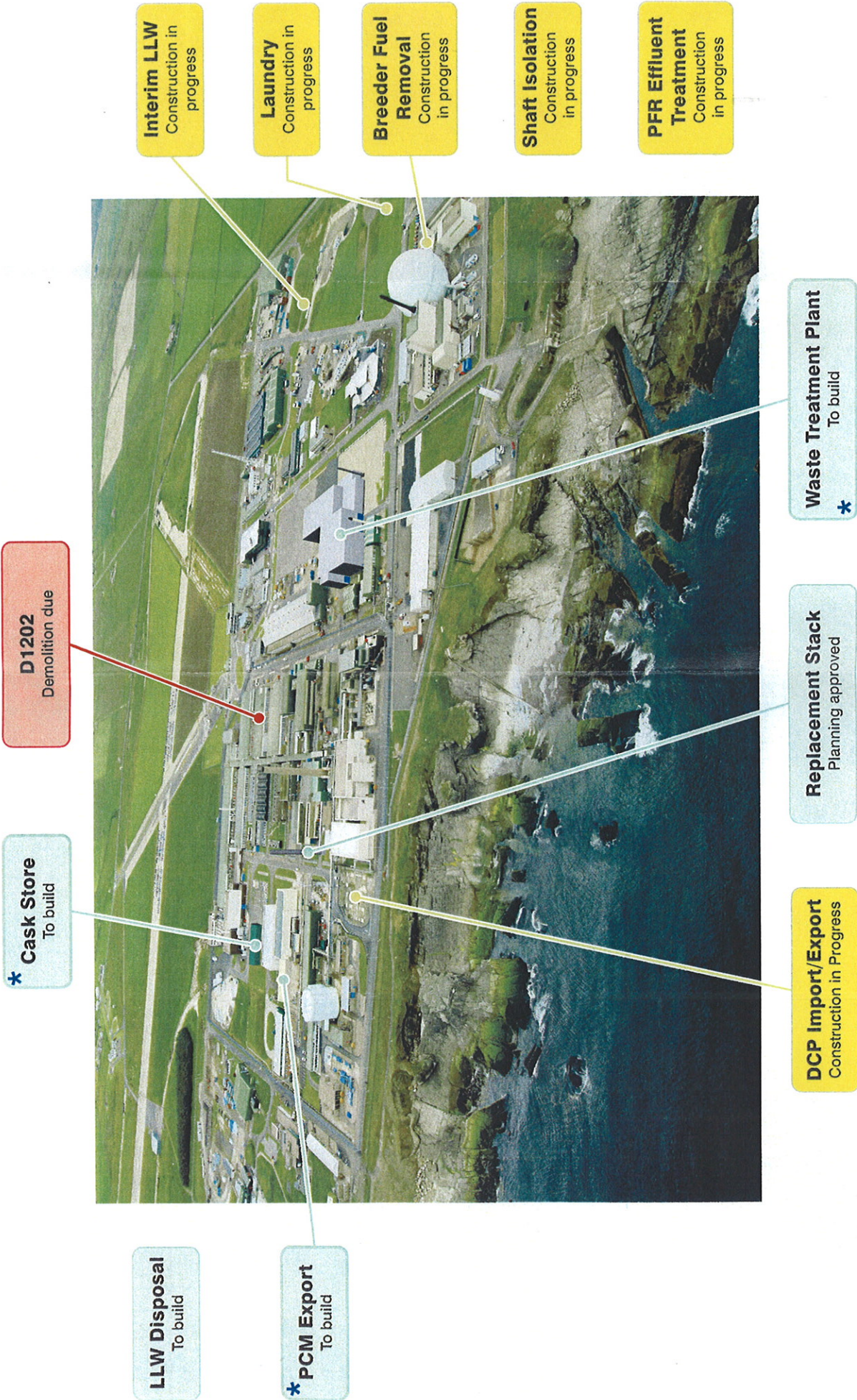
Private Land

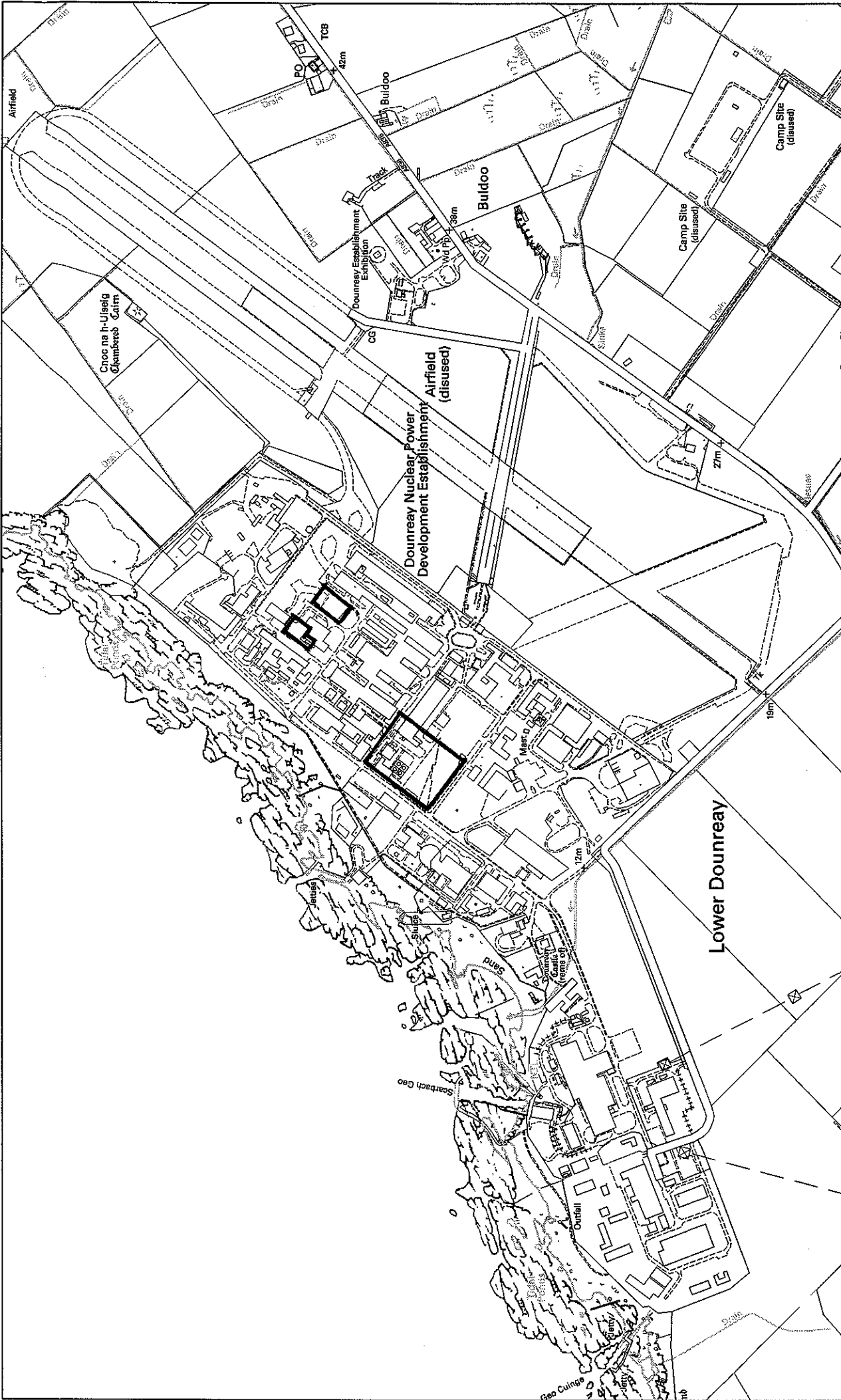
- A - Innes
- B - Henderson
- C - Mackay
- D - Scottish & Southern Electricity Board
- E - Sutherland

Note: LLW and LA/HV Facilities will be sub-surface. sizes and locations shown are indicative and will be bounded within the red line area of the airfield.

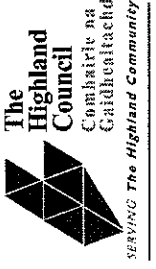


Phase 1* Development (2005 - 2010)





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06/00420/OUTCA
Phase 1 (2005-10)
Scale: 1:10000 **Date: 16/01/2007**