Agenda Item	6.4
Report No	PLN/041/21

HIGHLAND COUNCIL

Committee: North Planning Applications Committee

Date: 8 June 2021

Report Title: 21/00610/FUL: WP Grid Services Limited

Thurso South Substation, Geiselittle, Thurso, KW14 8YH

Report By: Acting Head of Development Management

Purpose/Executive Summary

Description: Erection of grid stability facility including grid stability unit, ancillary

equipment, access, landscaping, drainage, car parking and boundary

enclosures

Ward: 02 – Thurso and North West Caithness

Development category: Major

Reason referred to Committee: Major Development

All relevant matters have been taken into account when appraising this application. It is considered that the proposal accords with the principles and policies contained within the Development Plan and is acceptable in terms of all other applicable material considerations.

Recommendation

Members are asked to agree the recommendation to **GRANT** the application as set out in section 11 of the report

1. PROPOSED DEVELOPMENT

- 1.1 The application is for a grid stabilisation facility for the electricity transmission network and to facilitate an increasing proportion of electricity generation from renewable sources. The development itself, would not generate any electricity but would help reduce the potential for power cuts to occur across the network and would help to restore service in the event of blackouts.
- 1.2 Power has historically been generated in large fossil fuel power stations that have inherent stabilising qualities. Wind turbines, solar farms and interconnectors do not have the same stabilising properties. There is therefore a need for standalone stability systems such as the proposed grid stability facility (synchronous condenser) to service Thurso South Substation and the surrounding transmission network. Facilities such as these do not generate electricity but effectively act as a clutch to smoothly balance the transmission network. The need for this facility has been identified by National Grid who have assessed Thurso South as representing a high efficiency location at which the stability needs of this part of the grid network could be met. The applicant has also considered needs across the wider network and is proposing three other similar facilities in different local authority areas. If each is consented, the four grid stability facilities would, as well as meeting grid stabilising need in the immediate vicinity of each facility, collectively meet the wider needs of the grid across Scotland.
- 1.3 The proposed facility comprises an electricity transmission infrastructure compound, transformers and cables running into a main plant room building housing the stability equipment. Coolers are connected to the equipment to ensure that the equipment does not overheat, and control rooms are provided to enable the smooth running of the facility.

1.4 Key elements of the development include:

- the main facility building with a footprint of 1,215sqm, measuring 54m x 22.5m, and a height of up to 11m to ridge, 10m to eaves. The main building would contain two pieces of grid stability hardware, with a lower section of the building containing a control room. The norther elevation would have a roller shutter door, with the facility having two louvers (measuring 2m x 1m), limited other domestic scaled external doors and windows at ground floor level on the rear western elevation. The main building is proposed to be profiled metal sheet panels, finished in a dark blue-grey;
- transformers connecting the main building to external transmission infrastructure to the west of the building. This would take the form of piped cabling at lower level from the main plant hall, over the control room into an Extra High Voltage (EHV) compound at the south of the site with this compound having a comparable footprint to the main facility building with components measuring around 6m in height;
- a grid connection to be made into the neighbouring substation. This would take the form of an underground cable leading from the EHV compound and into the substation to the west:
- ancillary plant, including cooling equipment and 3x back-up emergency diesel generators (with a combined maximum potential output of 4.63MW) would be situated around the building. This equipment with an associated covered fuel unloading bay, would sit to the west of the building;

- a new site access would be formed onto the A9 to the east of the site:
- provision for 40 parking spaces during construction, with 8 parking spaces remaining for operational purposes, including 1 disabled and 1 electronic charging point;
- new areas of mixed woodland planting north and south and ground regrading works to form a 2-3m high bunds to the north, south and east with an average gradient of 1:13 as well as field hedgerow planting around the northern, eastern and southern site perimeter;
- security fencing, comprising 2.5m high palisade fencing topped with 1m high electric fencing, security cameras and gated entrance setback from the A9;
- two internal 4m wide farmer access tracks and gates following the eastern and southern site boundaries, serving the surrounding arable farmland; and
- SuDS with the formation of open swales and an attenuation basin to the south west of the site, and provision of a septic tank.
- 1.5 The applicant has undertaken statutory pre-application consultation procedures, with an online public event to seek the views of the local community. This was held on 2 December 2020. Owing to the Covid-19 restrictions and the request of the Planning Authority, the applicant issued event invitations to all properties within 3km of the site which included 971 addresses. Up to 20 unique visitors viewed the consultation website with 1 person engaging in the live question and answer session, and 1 person completing the online questionnaire. No concerns with the development were raised.
- The applicant also utilised the Council's major pre-application advice service. The feedback received was that the Planning Authority were supportive of proposals of this nature, however, had reservations regarding the layout of the site given the site's context. In the first iteration of the proposals which was initially tabled, the developable area extended further eastward, toward the A9. The need to minimise landscape and visual impact of the development was therefore highlighted with the proposals having been revisited to give due consideration to this matter.
- 1.7 The application was supported by the following documents:
 - Environmental Appraisal comprising:
 - o Accessibility Statement
 - Acoustic Technical Report
 - Flood Risk Assessment and Drainage Impact Assessment (updated April 2021)
 - Landscape and Visual Impact Appraisal
 - Preliminary Ecological Appraisal Report
 - Heritage Assessment
 - Tree Survey and Arboricultural Constraints
 - Phase 1 Contamination Assessment
 - o Phase 2 Geoenvironmental Assessment;
 - Design, Access and Sustainability Statement;
 - Planning Statement; and
 - Pre-Application Consultation Report.
- 1.8 The Town and Country Planning (Environmental Impact Assessment) (Scotland) Regulations 2017 requires development falling within Schedule 2 to be screened to determine if it constitutes 'EIA development'. EIA Screening was therefore

undertaken upon receipt of the application. Whilst it is agreed that development would not generate electricity, and therefore is not considered to fall within Schedule 2, Part 3(a), or Schedule 2, Part 3(c) relating to overhead electrical transmission, it is considered by the Planning Authority that the development falls within Part 10(b) under the definition of an 'Urban Development Project', with the applicable threshold in Column 2 of a development area over 0.5 hectares having been exceeded. Having screened the proposal against the selection criteria outlined in Schedule 3 (including cumulative impact, pollution, impact on the receiving environment), while possible, no likely significant effect on the receiving environment are anticipated. Therefore, the proposed development does not constitute 'EIA Development' and an Environmental Impact Assessment is not required.

1.9 Variations:

 reduction in the extent of hardstanding areas associated with the new site access post construction, to reflect site operational and maintenance requirements.

2. SITE DESCRIPTION

- 2.1 The site extends to 7.9 hectares and lies around 2km to the south of Thurso, located to the east of Thurso South substation. The site comprises predominantly agricultural land forming part of two arable fields, as well as the southern part of the existing substation. To the north, the site is open with the fields continuing up to the existing substation access road, to the east lies the A9 which is bound by hedgerow. To the south, the site is bound by a field drainage ditch, with further arable fields beyond, and to the west lies an area of conifer plantation which is effective at screening much of the existing substation from the A9 in close proximity, excluding the overhead line towers which run south to north into the substation.
- 2.2 The site's topography and surroundings are relatively flat, with the site having a slight fall from north to south of around 3m, from 39mAOD to 36mAOD, towards the field drain which flows east to west connecting the site with the River Thurso Site of Special Scientific Interest (SSSI) and Special Area of Conservation (SAC), located around 550m to the west. The site itself is free from any specific environmental designations or built heritage constrains.

3. PLANNING HISTORY

boundary enclosures

3.1	20/04223/PAN: Erection of grid stability facility with ancillary works including access, parking, landscaping and grid connection	Closed	03.11.2020
3.2	20/02793/PREMAJ: Erection of grid stability facility with ancillary works including landscaping, parking, grid connection, drainage and boundary enclosures	Closed	05.10.2020
3.3	20/02866/PAN: Erection of grid stability facility with ancillary works including landscaping, parking, grid connection, drainage and	Closed	19.08.2020

3.4	15/04103/S37: Erect a 132kV AC overhead, double circuit, steel lattice tower, transmission line between the proposed Sealing End Tower at Weydale and the proposed Sealing End Tower at Reaster, Caithness	S37 Raise No Objection	10.01.2017
3.5	13/00594/FUL: Construction of a new 275/132/33kV electrical substation	Application Permitted	12.09.2013
3.6	13/00636/OHL: Installation of 275KV Transmission Line from Dounreay - Spittal	S37 Raise No Objection	01.05.2013
3.7	12/02135/SCRE: Construct a new 275kV/132kV/33kV substation and associated infrastructure on land to the south of the existing Thurso substation.	EIA Not Required	22.06.2012

4. PUBLIC PARTICIPATION

4.1 Advertised: Schedule 3 Development / Unknown Neighbour

Date Advertised: 26.02.2021

Representation deadline: 12.03.2021

Timeous representations: 0

Late representations: 0

5. CONSULTATIONS

- 5.1 **Castletown Community Council** have been consulted. We are awaiting a response and any response received shall be verbally reported at committee with any responses to the points raised as required.
- Development Plans do not object to the application. It notes that pertinent Development Plan policies are considered to be Highland-wide Local Development Plan (HwLDP) Policies 36 Wider Countryside, 61 Landscape and 69 Electricity Transmission Infrastructure relating to siting and design, being compatible with landscape character, drainage and servicing. Other relevant policies are also identified. It explains that no site-specific Caithness and Sutherland Local Development Plan policies apply. It advises that the principle of a grid stabilisation facility is supported, and that following pre-application discussions it welcomes that the maximum height of the facility has decreased with a further setback from the A9 having been achieved. New areas of planting to the north and south are also welcome.
- 5.3 **Transport Planning** do not object to the application. It explains that trip rates associated with the construction phase of the development have been identified by the applicant, as well as the likely source of material for the civils works being from A and W Sinclair Quarry with a routing avoiding the village of Watten. The response disputes the applicant's findings that the proposal will have an immaterial impact on the local road network. As such, conditions are advised to secure further mitigation measures to ensure no net damage to the local road network. A

Construction Traffic Management Plan, informed by finalised details of traffic routing and volumes once the main contractor has been appointed, is therefore required with this document included a detailed assessment of construction traffic on the selected routes. A wear and tear agreement under Section 96 of the Roads (Scotland) Act is also required.

- 5.4 **Access Officer** does not object to the application. It notes that the site is not used for public recreation and expects limited impacts to occur on public access. Post construction recreational access is advised for all areas out with the main compound, with stock field gates to remain unlocked or pedestrian gates should be provided.
- 5.5 **Environmental Health** do not object to the application. It notes that their service has had issues with noise arising from substations in the past and that there are concerns generally with the introduction of any type of large electrical installation which may introduce a new source of noise into a quiet rural area. The noise survey work undertaken indicates that both the existing baseline and the predicted operational noise levels are low, with predicted noise levels increasing by 4db at the nearest noise sensitive receptor which is around 370m away. Conditions are advised to specify a noise limit for the development, to undertake compliance monitoring plan and in the event of any noise complaint, to undertake further noise monitoring at the operator's expense.
- Flood Risk Management do not object to the application following submission of additional information. The preliminary finished floor level indicates that the construction areas are not subject to flood risk. It also confirms that the revised Drainage Impact Assessment is acceptable, with the SuDS design providing additional storage.
- 5.7 **Forestry Officer** does not object to the application. Further to undertaking internal discussions with the Council's Landscape Officer, he agrees that the scale and design of the woodland and hedge planting is appropriate and more in keeping with the existing landscape than the additional planting he initially sought. Conditions are advised to agree the detail of the planting specification, maintenance arrangements and for the planting to be overseen by a forestry consultant.
- 5.8 **Historic Environment Team (Archaeology)** do not object to the application. It considers there is potential for buried features or finds and therefore requests an archaeological watching brief to be secured by condition.
- 5.9 **Contaminated Land** do not object to the application. It has reviewed the geoenvironmental assessment provided which concludes that remediation is not required, with any basic radon protection requirements to be considered at the Building Warrant stage.
- 5.10 **Scottish Environmental Protection Agency (SEPA)** do not object to the application and have no site-specific advice.
- 5.11 **NatureScot** do not object to the application. It confirms that no formal comments will be forthcoming.

- Historic Environment Scotland do not object to the application. It confirms that they have assessed the proposals for their historic environment interests, namely: Scheduled Monument (SM594) Tulloch of Shalmstry, broch 275m SE of Shalmstry, and confirm that they do not have any comments to make.
- 5.13 **Transport Scotland** do not object to the application. Conditions are requested in relation to the prior approval of the routing of abnormal loads, associated construction temporary traffic control measures, the finalised new site access junction design, and provision of wheel washing facilities.
- 5.14 **Scottish Water** do not object to the application. It notes that there is currently sufficient capacity in the Loch Calder Water Treatment Works to service the development, however there is no public Scottish Water Waste Water infrastructure within the vicinity and therefore a private treatment option is advised.
- 5.15 **Access Panel Sutherland** did not respond to the consultation.

6. DEVELOPMENT PLAN POLICY

The following policies are relevant to the assessment of the application

6.1 Highland Wide Local Development Plan 2012

- 28 Sustainable Design
- 29 Design Quality and Place-making
- 30 Physical Constraints
- 31 Developer Contributions
- 36 Development in the Wider Countryside
- 51 Trees and Development
- 52 Principle of Development in Woodland
- 55 Peat and Soils
- 56 Travel
- 57 Natural, Built and Cultural Heritage
- 58 Protected Species
- 59 Other important Species
- 60 Other Importance Habitats
- 61 Landscape
- 64 Flood Risk
- 65 Waste Water Treatment
- 66 Surface Water Drainage
- 69 Electricity Transmission Infrastructure
- 72 Pollution
- 74 Green Networks
- 77 Public Access

6.2 Caithness and Sutherland Local Development Plan (CaSPlan) (2018)

There are no site-specific policies covering the site and the site is distant from all defined Settlement Development Areas.

6.3 Highland Council Supplementary Planning Policy Guidance

Developer Contributions (2018)

Flood Risk and Drainage Impact Assessment (2013)

Green Networks (2013)

Highland Historic Environment Strategy (2013)

Highland Renewable Energy Strategy and Planning Guidelines (2006)

Highland's Statutorily Protected Species (2013)

Managing Waste in New Developments (2013)

Physical Constraints (2013)

Public Art Strategy (2013)

Roads and Transport Guidelines for New Developments (2013)

Standards for Archaeological Work (2012)

Sustainable Design Guide (2013)

Trees, Woodlands and Development (2013)

7. OTHER MATERIAL POLICY CONSIDERATIONS

The Highland Council Non-Statutory Planning Guidance

7.1 The Highland-wide Local Development Plan is currently under review and is at Main Issues Report Stage. It is anticipated the Proposed Plan will be published following publication of secondary legislation and National Planning Framework 4. In addition, the Planning Authority has further advice on delivery of major developments in a number of documents. This includes Construction Environmental Management Process for Large Scale Projects (Aug 2010).

Scottish Government Planning Policy (SPP) and Guidance

- 7.2 Scottish Planning Policy (SPP) advances principal policies on Sustainability and Placemaking, and subject policies on A Successful, Sustainable Place; A Low Carbon Place; A Natural, Resilient Place; and A Connected Place. It also highlights that the Development Plan continues to be the starting point of decision making on planning applications. The content of the SPP is a material consideration that carries significant weight, but not more than the Development Plan, although it is for the decision maker to determine the appropriate weight to be afforded to it in each case.
- 7.3 As a statement of the Government's approach to spatial planning in Scotland, National Planning Framework 3 (NPF3) is a material consideration that should be afforded significant weight in the planning balance. NPF3 considers that the strategy of a low carbon place reflects the significant opportunities for growth arising from our natural energy resources and that to achieve this ambition, there is need for a range of infrastructure, including new facilities to enhance the high voltage energy transmission network. The Scottish Government published, Scotland's Fourth National Planning Framework Position Statement in November 2020. The position statement sets out that the current NPF3 and SPP remain in place until NPF4 is adopted by Ministers.

Other Relevant National Guidance and Policy

- 7.4 Historic Environment Policy for Scotland (HEPS, 2019)
 - PAN 1/2011 Planning and Noise (Mar 2011)
 - PAN 60 Planning for Natural Heritage (Jan 2008)

- PAN 68 Design Statements
- 2020 Routemap for Renewable Energy (Jun 2011)
- Energy Efficient Scotland Route Map (May 2018)

8. PLANNING APPRAISAL

8.1 Section 25 of the Town and Country Planning (Scotland) Act 1997 requires planning applications to be determined in accordance with the development plan unless material considerations indicate otherwise.

Determining Issues

This means that the application requires to be assessed against all policies of the Development Plan relevant to the application, all national and local policy guidance and all other material considerations relevant to the application.

Planning Considerations

- 8.3 The key considerations in this case are:
 - a) Development Plan and National Policy
 - b) Construction
 - c) Roads, Transport and Access
 - d) Water, Flood Risk, Drainage and Soils
 - e) Natural Heritage
 - f) Built and Cultural Heritage
 - g) Design, Landscape and Visual Impact
 - h) Noise and Vibration
 - i) Other Material Considerations

Development Plan and National Policy

- The Development Plan comprises the adopted Highland-wide Local Development Plan (HwLDP), Caithness and Sutherland Local Development Plan (CaSPlan) and all statutorily adopted supplementary guidance. If the Council is satisfied that the proposal is not significantly detrimental overall, then the application will accord with the Development Plan.
- The principal HwLDP policy on which the application needs to be determined is Policy 69 Electricity Transmission Infrastructure which offers support for proposals for electricity transmission infrastructure, having regard to their level of strategic significance in transmitting electricity from areas of generation to areas of consumption. Such support it subject to the proposals not having an unacceptable significant impact on the environment. In this regard, HwLDP Policy 36 Development in the Wider Countryside sets out that all development in the countryside will be determined on the basis of a number of criteria. Pertinent matters to this proposal include: siting and design, being compatible with the landscape character and capacity, as well as drainage and servicing implications.
- The area plan covering the allocation of sites is the CaSPlan. It focuses mainly on regional and settlement strategies and identifying specific site allocations. No site specific policies apply, however, broad support for the principle of the proposed development is expressed within the Plan's Spatial Strategy (Para 9, fourth bullet)

which states: "With a focus on Employment...Supporting and enabling a High Voltage Energy Transmission Network (as identified in NPF3), recognising the strategic need and where relevant national priority of some schemes, whilst carefully considering route options and detail of proposals, promoting optimisation of the network to achieve significant benefits with limited impacts through a coordinated approach and smart solutions."

- 8.7 As the development would provide additional grid stability for the transmission network and would help to facilitate an increasing proportion of electricity generation from renewable sources, the principle of the development receives support under HwLDP Policy 69, subject to site selection, design and overcoming any unacceptable significant environmental effects. In this regard, the site does not benefit from any positive development allocation and is outwith a Settlement Development Area (SDA). The site is situated east of the existing Thurso substation and its associated woodland structural landscape planting which screens this infrastructure from the A9. The proposed development is sited on a large arable greenfield site which does not fall within any natural heritage, built heritage or landscape designations.
- 8.8 SPP's outcome 2 states that the SPP's intention is "reducing our carbon emissions and adapting to climate change". It proposes that to achieve this the planning system should "support the transformational change to a low carbon economy", "support the development of a diverse range of electricity generation from renewable energy technologies including the expansion of renewable energy generation capacity and the development of heat networks" and "guide development to appropriate locations".
- In late 2020, the Scottish Government published an update to SPP. The presumption in favour of sustainable development in SPP 2020 is considered to be more definitive than that set out in SPP 2014 as it removes the element of the presumption which supports "development which contributes to" sustainable development. In applying the principles set out in para 29 of SPP 2020, there is a requirement to assess whether a "proposal supports sustainable development" using a series of principles. It is for the decision maker to apply weight to each of the principles set out in para 29. In reaching a decision on whether the development meets with the principles, it is necessary to consider whether the proposed development can be considered sustainable development.
- 8.10 SPP 2020 modified paras 32 and 33 which are related to the status of the development plan in terms of its age and conflicts with the presumption set out in SPP 2020. SPP 2020 removes the references to up-to-date / out-of-date plans and the related footnote. While this modification has been made it is important to note that although the HwLDP is more than five years old, it is not considered that the relevant provisions of the plan are out of date.
- 8.11 The Scottish Government published, Scotland's Fourth National Planning Framework Position Statement in November 2020. It provides an idea of the direction of travel in the preparation of the NPF4, and states that it "is not, in itself, a document setting out policy. Statements in this Position Statement as to what the content of a revised National Planning Framework will contain should be read in that context." (page 4). It can be afforded limited weight, particularly because the status of NPF3 and SPP has not changed.

- 8.12 The Position Statement provides general support for delivery of renewable development through the introductory statements and key opportunities set out in the Position Statement. The Position Statement includes a proposal for a "Plan for Net-Zero Emissions". It is of note that the Scottish Government expects that the Global Climate Emergency should be a material consideration in considering applications. The Position Statement sets out that "We will have to rebalance the planning system so that climate change is a guiding principle for all plans and decisions. We will need to focus our efforts on actively encouraging all developments that help to reduce emissions". While this may have implications for applications for renewable energy developments, and the associated transmission network, this needs to be considered in the context of the potential policy changes which look to site specific assessment of proposed developments demonstrating that proposals are acceptable.
- 8.13 A number of publications relating to national energy policy have been published by the Scottish Government. In short, none indicate a relevant distinct policy change. Most relevant to this application are as follows:
 - Scottish Energy Strategy: The future of energy in Scotland (Dec 2017)
 - Scottish Government, Securing a Green Recovery on a Path to Net Zero: Climate Change Plan 2018–2032 – update, December 2020;
 - Committee on Climate Change, The Sixth Carbon Budget, The UK's Path to Net Zero. (including Policy and Methodology), December 2020;
 - National Audit Office, Net Zero Report, December 2020; and
 - HM Government, Energy White Paper, Powering our Net Zero Future, December 2020.
- 8.14 Further to the above, in late 2019 the Scottish Government's targets for reduction in greenhouse gases were amended by The Climate Change (Emissions Reduction Targets) (Scotland) Act 2019. This sets targets to reduce Scotland's emissions of all greenhouse gases to net-zero by 2045 at the latest, with interim targets for reductions of at least 56% by 2020, 75% by 2030, 90% by 2040.
- 8.15 The Highland Council recognise the Scottish Government's declaration of the climate emergency and related biodiversity crisis and have indeed also declared a climate and ecological emergency, but the response to this and manner in which any changes will feed through is yet to be established. The updated Climate Change Plan and the NPF position statement give an indication of the direction of policy but without suggestion of any lessening of protection for the environment. In the meantime, it is appropriate that existing and established policy continues to apply.
- The applicant has stated that proposed development by its very nature would promotes environmental sustainability by upgrading the grid, increasing its capacity to accommodate renewables and enabling the renewables that are already connected to be used more. The development will not directly generate carbon emissions, so therefore can be considered to have a negative carbon footprint. Although the proposal itself does not constitute renewable energy generation, it would assist with the transition towards enabling the transmission network to accommodate more renewable sources of energy which are less stable than traditional fossil fuel power stations. However, the sustainable credentials of such a facility is dependant on the mix of energy generated in the grid at any given point

in time. As well as economic consumer cost savings associated with implementing this technology, and helping to maintain electricity services across the area, the proposal would promote environmental sustainability by upgrading part of the transmission grid, increasing its capacity to accommodate more renewable electricity generation. If sensitively designed and sited, the proposal therefore has the potential to contribute towards sustainable development, national and local climate change policies and targets, and facilitate more renewable development to make a meaningful contribution toward the production of renewable energy.

Construction

- 8.17 It is anticipated that the construction period for the development would take 18 months. Working hours on site would usually be restricted to 08.00 19.00 Monday to Friday, 08.00 13.00 on Saturday with no Sunday of Bank Holiday working. Some flexibility for similar installations is normally granted at electrical fit out. Such activities involve specialist labour and generally do not involve activities which generate impacts beyond the site boundary.
- 8.18 The project anticipates the deployment of a Construction Environmental Management Document (CEMD) in association with the successful contractor engaged. This should include a site-specific environmental management procedures which can be finalised and agreed through appropriate planning conditions with the Planning Authority and relevant statutory consultees. Such submissions are expected to be "plan based" highlighting the measures being deployed to safeguard specific local environmental resources and not simply restate best practice manuals.
- 8.19 In addition to the requirement for submission and agreement on a CEMD, the Council will require the applicant to enter into legal agreements and provide financial bonds with regard to its use of the local road network (Wear and Tear Agreement) and final site restoration (Restoration Bond). In this manner the site can be best protected from the impacts of construction and for disturbed ground to be effectively restored post construction and operational phases.
- 8.20 Developers also have to comply with reasonable operational practices with regard to construction noise so as not to cause nuisance. Section 60 of the Control of Pollution Act 1974 sets restrictions in terms of hours of operation, plant and equipment used and noise levels etc. and is enforceable via Environmental Health.

Roads, Transport and Access

8.21 The applicant has highlighted the expected impact of this development, particularly through the construction phase, with the Port of Entry for an abnormal indivisible load likely to be Scrabster Harbour. This load would then then travel from the port via the A9 trunk road before entering the site via a new junction. It is anticipated by the applicant that the A and W Sinclair Quarry at North Watten would be the main source of materials during the civil works stage of construction, and a proposed route to site avoiding the village of Watten is identified following the local B874 and A882 to reach the A9. During the peak construction 6 month civils phase, in the order of 50 HGVs (100 two way movements are anticipated) per day, over half of which would be concrete deliveries. During the 6 month installation phase, around

20 construction workers are also anticipated to be on site. Thereafter, once operational, the facility would not regularly be manned with the facility generating 1-2 light vehicle trips per week.

- 8.22 The applicant's Environmental Appraisal has found that the construction phase would not generate any significant impacts on the local or trunk road network. Whilst the site is well served by the A9, this has been contested by Transport Planning who require all impacts on the local road network to be considered and assessed further via the submission of Construction Traffic Management Plan, informed by finalised details of traffic routing and volumes once the main contractor has been appointed. The provision of this document can be conditioned. Further mitigation measures will also be necessary for the delivery of the abnormal load (265 tonnes) which has been the subject of a separate route investigation, including swept path analysis. The transportation of this load requires the temporary removal of various street furniture (including traffic lights and railings) in Thurso, the plating of footways and traffic restrictions. Any such offsite measures would be subject to obtain further approval from the relevant Roads Authority.
- 8.23 The necessity for the proposed new site access junction was questioned by the Planning Authority, with the applicant being encouraged to share the existing substation junction to the north for construction or operation to limit visual impact and the footprint of development. The applicant has however confirmed the need for a new access on the basis of the substation requiring uninterrupted access at all times, with the possibility of a shared access impacting upon existing infrastructure, as well as future possible connections to the substation. The applicant has also sought a solution which remains in their control and is in accordance with their lease agreement. The applicant is now proposing to reduce the scale of the internal road infrastructure post construction, with the finalised junction detail, including access gate provision, to be subject to condition. Suitable visibility splays of 215m x 4.5m have been shown to be deliverable, without the loss of any substantial roadside hedgerow. The proposals also incorporate adequate parking provision.
- 8.24 Both Trunk Road Authority and the Council's Transport Planning Team have confirmed that development traffic can be accommodated on the road network, subject to conditions and a requirement for a legal agreement to address "wear and tear" provisions.
- 8.25 The site, like most land in Scotland, is subject to the provisions of the Land Reform (Scotland) Act 2003. No paths running through or immediately around the site. There will be a need to restrict access to the site during construction works and thereafter, the facility, rather than the perimeter of the site, will have security fencing. Conditions are to be imposed to ensure all field gates remain unlocked or for pedestrian gates, suitable for use by walkers, cyclists and horse riders to be provided.

Water, Flood Risk, Drainage and Soils

8.26 A Construction Environmental Management Document (CEMD) will be in place to ensure that potential sources of pollution on site can be effectively managed throughout construction and in turn during operation; albeit there will be fewer sources of pollution during operation. The CEMD needs to be secured by planning

condition. This will ensure the agreement of construction methodologies with statutory agencies following appointment of the main contractor and prior to the start of development.

- 8.27 In order to protect the water environment a number of measures have been highlighted by the applicant for inclusion in the CEMD including the adoption of sustainable drainage principles. This includes setbacks from the existing field drainage channel, employment of an Ecological Clerk of Works, delivering a SuDS with two stages of treatment (swale and attenuation basin), no direct discharges of any foul waste with a septic tank being proposed, and water quality monitoring to be undertaken during construction, and thereafter at 1 year post construction and 5 yearly intervals until completion of decommissioning to be set out within an operational management plan.
- 8.28 The applicant's Environmental Appraisal which considers flood risk and provides a Drainage Impact Assessment (DIA). The site infrastructure is not considered to be at risk of flooding, and whilst additional drainage information was provided during the course of the application, the drainage proposals are to the Council's Flood Risk Management Team's satisfaction with additional attenuation having been provided.
- 8.29 The site itself is not recognised as prime agricultural land. In relation to peat, the applicant has stated that the site has a mix of Class 0 (no peatland vegetation) and Class 3 (predominantly peaty soil with some peat soil), although there are no features on the ground to indicate this transition. No development is proposed in the Class 3 area. Soil depths are anticipated to be up to 0.4m and it has been conditioned within the CEMD, that all soil disturbance is minimised, that soils remain on site and are utilised in site landscaping.

Natural Heritage

- 8.30 The site is not within any areas designated as important for natural heritage at local, national or international level. There are however designations within a 2km radius study area. Notably, this includes the River Thurso SSSI and SAC, which is located around 550m to the west of the site beyond the substation. It is a European designated site with Atlantic salmon listed as the single qualifying feature for which this area is considered to be one of the best within the UK. As there is potential connectivity with this designated site, via the existing field drainage channel which flows from east to west, the requirements of the Conservation (Natural Habitats, and c.) Regulations 1994 as amended (the "Habitats Regulations") apply. Consequently, the Planning Authority is required to consider the effect of the proposal on the SAC before it can be consented (commonly known as Habitats Regulations Appraisal). This is contained in Appendix 1 of this report and concludes that the proposal would not adversely affect the integrity of this SAC subject to mitigation.
- 8.31 The site has been subject to ecological survey, including a site visit, which has confirmed that the conditions on the site support a limited range of habitats, reflective of the site comprising arable farmland (improved grassland) with perimeter species poor hedgerow, a drainage channel and plantation woodland. The two areas of plantation woodland surrounding the existing substation and appears on the Native Woodland Survey of Scotland as 'nearly native unidentified woodland' These trees have been subject to arboricultural survey which confirms

that they have been planted within the last 15 years and containing a mix of species with these trees averaging 6-7m in height. A condition has been included requiring tree protective fencing to safeguard these tees as far as possible, whilst it remains possible that certain trees may be lost to enable the underground connection to be formed between the substation and the proposed facility. Any losses would however be more than compensated for through the extent of additional proposed planting, which is for both landscaping and for biodiversity value. The finalised planting specification and management measures also being conditioned.

- 8.32 The ecology survey highlights no activity of any protected species, however, the site is considered to offer suitable foraging habitat for bats, for nesting birds around the perimeter of the site and there remains potential for reptiles and amphibian species to be present. As such, it is proposed that an ECoW be appointed to undertake a further pre-construction site walkover, to oversee site construction phase and to monitor compliance with the CEMD, including all pollution prevention measures. This can be secured by condition.
- 8.33 Overall, it is recognised that there will be limited impacts on natural heritage as a result of the proposed development and workable mitigation measures can be put in place to minimise environmental effects, with additional tree and hedgerow planting being beneficial to the biodiversity value of the site.

Built and Cultural Heritage

8.34 The site does not lie within any Conservation Area, there are no Scheduled Monuments or Listed Buildings within the site and there are no Inventoried Historic Gardens or Registered Battlefields within 1km. One Scheduled Monument, the Tulloch of Shalmstry, broch (SM594) does however lie around 1km to the south east adjacent to the A9. The development will have negligible impact on the setting of this heritage asset as the surrounding landscape is already impacted by modern development and the existing hedges and proposed tree plantation will mitigate the impact to its setting. There is also evidence of other prehistoric activity in the vicinity, albeit that trial trenching undertaken for the substation did not reveal any features. As there remains potential for buried features within the site, a condition requires an archaeological watching brief to be undertaken.

Design, Landscape and Visual Impact

8.35 The applicant has undertaken a Landscape and Visual Impact Appraisal, which forms part of their Environmental Appraisal. Whilst not a full LVIA, it follows the Guidelines for Landscape and Visual Impact Assessment (GLVIA), 3rd edition with it having informed the mitigation embedded within the proposed site layout and design, as well as landscape planting proposals. It focuses on a study area of 3km, with impacts beyond this range being considered negligible given the limited scope of the facility. A total of 7 viewpoints (VPs) have been assessed with regard to landscape and visual impact. These viewpoints are representative of a range of receptors including recreational users of the outdoors and road routes. The photomontages provided illustrate the development following the completion of landscape planting at year 1, and 15 years on, which is of a comparable age to the existing woodland surrounding the existing substation which is useful for assessing its scale and screening qualities.

8.36 Given the extent and maturity of woodland planting illustrated in the photomontage, it has been assumed that this reflects 15 years of maturity as per the visual assessment written description given in the Landscape and Visual Impact Appraisal, rather than the 10 years stated at the top of the relevant photomontage. The photography used for the applicant's photomontages is sub-standard with weather conditions being too overcast, or the photography being taking directly into the low winter sun. These photomontages are however for illustrative purposes only and the supporting wireframes, as well as the application elevation drawings, are adequate to gain an appreciation of the proposal's landscape and visual effects and enable the determination of the application.

Siting and Design

- 8.37 The proposal is situated within a very open landscape with the principal visual receptors being users of the A9 to the east and Thurso to the north. The 'Far North Line' railway line is also located around 70m to the west, as is the B874 local road. A scattering of rural farm buildings and residential properties are present in the surrounding area.
- 8.38 The advice given at the pre-application stage was that it was undesirable to screen the entirety of the development as this would involve substantial tree planting between the facility and the A9, thereby removing views across the open landscape either side of the facility to the north and south. It was therefore advised that the design of the building be of a standard which is fit to be seen, whilst keeping the building height as low and setback from the A9. This advise has been taken on board, with the proposals now being set down into the ground by around 1m, with the introduction of gradually sloped 2 3m high landscape gently graded bunds to the north, east and south. Low level landscape planting and new hedgerow will also help to screen the lower components of the facility, with the upper section of the building being partly screened by trees in more distant views to the north and south. This can be appreciated in VP1 (A9, Adjacent to the Site).
- 8.39 Alternative site selection options have also been considered as set out in the Design, Access and Sustainability Statement, which has concluded that the application site at Thurso South is preferable, given its ability to take a new access onto the A9 sufficiently distant from the substation access so as not to give rise to conflict, due to its good separation from any noise sensitive receptors, its ability to be landscaped and being reasonably distant from other constraints such as Scheduled Monument or any notable habitats.
- 8.40 The applicant's Design, Access and Sustainability Statement also describes the elevation treatment for each of the component parts of the development, as well as its layout, character, form and appearance. The architectural principles for the main plant building are simplicity and functionality, whilst also being appropriate to the wider agricultural setting. The principal eastern elevation will front the A9, with the building having a linier 54m frontage measuring 11m in height, with external connecting metal components including pipework and cables. The planning application drawings also confirm that the Finished Floor Level for the main facility building would be 37.3m AOD, meaning that with a maximum building height of

11.2m the building's ridge height would be at 48.5m AOD. When taking into account site re-profiling and establishment of site landscaping, principal visibility will remain towards the upper half of the main facility building.

Landscape Impact

8.41 The Proposed Development is not located within any landscape designations or Wild Land Areas. The site and all of the applicant's study area within 3km are located entirely within the 'Farmed Lowland Plain' Landscape Character Type (CLT 143) which extends over a large area of north east Caithness. This LCT is generally sensitive to the introduction of large buildings due to the agricultural character and visual openness of the lowland plain which generally lacks settlements of any significant size. The applicant's assessment concludes that landscape character in this area is locally modified due to the presence of the substation and its associated overhead lines and towers. Given the presence of comparably scaled large agricultural and industrial scaled buildings which are visible in the surrounding area. include those at Janetstown Industrial Estate, Georgemas Junction and at Upper Geiselittle, the landscape character is assessed to be of medium sensitivity. The overall magnitude of change to the LCT as result of the development is assessed as low, with mitigating factors being the extent of proposed bunded planning, as well as careful consideration of the specified dark colour of the main facility building to be consistent with the wooded backdrop. It is therefore concluded that the resultant adverse landscape effect would be no greater than minor in nature and not significant, particularly in the longer term once the landscape planting has matured. The applicant's findings are not contested, with the landscape being capable of absorbing the scale of the proposed facility, albeit that impacts will be more apparent in the short term.

Visual Impact

- 8.42 The applicant's assessment draws upon the supportive elements of how the proposal could be viewed within the landscape. The ZTV demonstrates that the scheme will be visible in most directions within a 3km radius, with theoretical visibility extending across the south west of Thurso. The ZTV can not however, identify how much of the structure would be visible across the area in reality when taking into account any intervening vegetation, boundary fences or intervening buildings. Of the assessed representative viewpoints, the applicant has identified minor adverse visual effects to occur in the longer term for users travelling along the A9, particularly southbound as the development would break the skyline as illustrated by VP2 (A9, Upper Geiselittle) and VP6 (A9, Mountvernon). The proposed new planting would help integrate and soften the appearance of the development, however, the building would still remain visible, particularly from the A9 in close proximity, with longer term minor adverse visual effects also arising for localised, 5no. residential properties which surround the site. The siting and design of the facility has sought to mitigate these impacts wherever possible, although, the building's massing and proximity to these receptors means that these findings are reliant upon the maturity of the proposed woodland planting.
- What the applicant's assessment fails to effectively communicate is the shorter term 1 to 15 year period residual visual effects. By applying the applicant's assessed sensitivity for each receptor, and the assessed year 1 magnitude of change, this indicates that significant adverse visual effects are likely to arise for users of the

A9, represented by VP1 (A9, Adjacent to the Site); and VP2 (Upper Geiselittle), as well as for residents at Upper Geiselittle. These effects will be predominantly be for southbound users of the A9, but also northbound, particularly for passengers who are able to take in their surroundings. These significant effects would be mitigated in the longer term as landscape planting matures and visual effects from all other viewpoints are not anticipated to be significant, in either the short or longer term.

8.44 Conditions are proposed to agree the finalised boundary treatments, building materials, colours and finishes to ensure that these remain recessive, with any external or internal lighting to be kept to a health and safety minimum, and for all finishes to be non-reflective wherever possible.

Noise and Vibration

- 8.45 Environmental Health have advised that their service has had issues with noise arising from substations in the past and that there are concerns generally with the introduction of any type of large electrical installation which may introduce a new source of noise into a quiet rural area. In this instance however it is not anticipated that noise or vibration will be a significant issue as a result of this development, both individually and in combination with the existing substation, due to the distance between it and noise sensitive properties, and the design of the facility and minimum 2m high bunding proposed. The mitigation measures built into the facilities design include consideration of the type of technology proposed, the building's façade, the size and positioning of ventilation louvers and use of a roller shutter door. Whilst back-up generators are also proposed, these would only by run in the event of power outage emergency with testing taking place one a month for a 15 minute interval during the day and not at full power. On this basis, their operation has not warranted inclusion within the applicant's noise survey.
- The applicant's assessment includes a background noise survey covering daytime and night time periods. The noise survey work undertaken indicates that both the existing baseline and the predicted operational noise levels are low, with the development's location achieving good separation from the nearest 5 sensitive residential properties. Noise levels are predicted to increase by 4db (Excess of LAr,Tr above LA90,T) at the nearest noise sensitive receptor (Upper Geiselittle) which is located around 370m to the north east, on the eastern side of the A9. Adverse noise impacts at this receptor are predicted to be of low and not significant, with noise impacts at all other nearby residential receptor being low to no impact. Conditions are advised to specify a noise limit for the development, to undertake compliance monitoring plan and in the event of any noise complaint, to undertake further noise monitoring at the operator's expense.

Other Material Considerations

The applicant has been advised that at the end of the facility's operational life, which could be in the region of 40 years' time, if the decision is made to decommission the facility, all infrastructure is required to be removed from the site. Any foundations remaining on site require to be removed to a depth of 1m below the surface, graded with soil and planted. Cables also require to be cut away below ground level and sealed. The access road and the site junction would also require to be removed with the ground reinstated to the approximate pre-development condition, unless otherwise agreed with the Planning Authority.

These matters will not be confirmed until the submission of the Decommissioning and Restoration Plan (DRP) which would reflect best practice measures at its time of preparation. The DRP would be submitted to and approved in writing by the Planning Authority in consultation with NatureScot and SEPA no later than 12 months prior to the final decommissioning of the facility. The detailed DRP would be implemented thereafter within the final decommissioning of the development and restoration of the site being completed as per the approved plan.

Matters to be Secured by Section 75 Agreement

- 8.49 The decommissioning of the facility and the removal of all site infrastructure in the event of it's non-use or becoming redundant technology, would be subject of a financial guarantee which is to be secured by Section 75 legal agreement. The value of the guarantee will need to cover the itemised costs for the works set out in a decommissioning schedule. This should be presented in a table format split by construction and operational phase and may require third party verification to be undertaken by a suitably qualified independent professional at the applicant's expense. Thereafter, the level of financial guarantee would be subject to regular five yearly review periods until such a time the facility is decommissioned and the site restored. The applicant is agreeable to entering into a Section 75 agreement on the above terms, with the aforementioned detail to be provided prior to issue of any forthcoming planning permission decision notice.
- 8.50 The applicant has four months from the date that the Council's solicitor writes to the Applicant/Applicant's solicitor indicating the terms of the legal agreement, to deliver to the Council a signed legal agreement. Should an agreement not be delivered within four months, the application shall be refused under delegated powers.

9. CONCLUSION

- 9.1 The Scottish Government gives considerable commitment to renewable energy. Although the proposal itself does not constitute renewable energy generation, it would assist with the transition towards enabling the transmission network to accommodate more renewable sources of energy and maintain its stability to help avoid and minimise the duration of black out events.
- 9.2 The proposal has also benefited from utilising the Council's major pre-application service, which has resulted in more sensitive designed and sited building, set back further from the A9 and being reduced in scale. Subject to the successful implementation of the site landscaping proposals, such adverse landscape and visual effects can be accommodated, with any significant visual effects being contained principally to a short section of the A9 whilst site landscape establishes.
- 9.3 Having found effects on other environmental matters can be adequately managed by condition, it therefore comes to the planning balance in relation to principally the strategic energy transmission benefits of the scheme, and its adverse landscape and visual effects. The proposed development as now presented would not be considered significantly detrimental overall, and its benefits associated with facilitating more renewal energy generation and economic benefit are considered

to outweigh the contained significant visual impacts. Scottish Planning Policy aims to achieve the right development in the right place. It is considered that, subject to the conditions proposed, this development meets with this aim.

- 9.4 The application has been assessed against the policies set out in the Development Plan, principally HwLDP Policy 69 with the development having been found not to have an unacceptable significant impact on the environment overall. This policy also reflects policy tests of other subject specific policies in the plan, for example HwLDP Policy 28, and those listed in Section 6 above. Given the above analysis, the application has been found to accord with the Development Plan.
- 9.5 All relevant matters have been taken into account when appraising this application. It is considered that the proposal accords with the principles and policies contained within the Development Plan and is acceptable in terms of all other applicable material considerations.

10. IMPLICATIONS

- 10.1 Resource: Not applicable.
- 10.2 Legal: Not applicable.
- 10.3 Community (Equality, Poverty and Rural): Not applicable.
- 10.4 Climate Change/Carbon Clever: The proposal can facilitate a transition to a more stable lower carbon grid.
- 10.5 Risk: Not applicable.
- 10.6 Gaelic: Not applicable.

11. RECOMMENDATION

Action required before decision Y issued

Conclusion of Section 75 Obligation.

To secure decommissioning and restoration of the site at the end of the schemes operational life.

Conditions and Reasons

1. In the event that the installed and commissioned grid stabilisation facility fails to be in operation to serve the needs of the national grid for a continuous period of 24 months, then unless otherwise agreed in writing with the Planning Authority, the facility will be deemed to have ceased to be required. If deemed to have ceased to be required, the entirety of the facility, including all ancillary equipment and site infrastructure, will be dismantled and removed from the site at the operators expense within the following

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24 month period, and the ground reinstated in accordance with the detailed decommissioning, restoration and aftercare strategy and plan, as per the requirements set out within Condition 16.

Reason: To ensure the decommissioning and removal of the development in an appropriate and environmentally acceptable manner and the restoration of the site. In the interests of safety, amenity and environmental protection.

- (1) No development shall commence unless and until full details of the proposed grid stabilisation facility (and ancillary infrastructure) hereby permitted, have been submitted to and approved in writing by the Planning Authority. These details shall include:
 - a) the external materials, colours and finishes of all buildings, external plant or equipment and site fencing, with a non-reflective, semi-matte finish to be specified throughout; and
 - b) any variation to the louver, door or window specifications or dimensions set out on the application drawings.
 - (2) No element of the development shall have any text, sign or logo displayed on any external surface of the facility, save those required by law under other legislation.
 - (3) Thereafter, the facility shall be installed in accordance with these approved details and, with reference to part (a) above, the facility shall be maintained in the approved colour, free from rust, staining or discolouration until such time as the development is decommissioned.
 - (4) All cables between the facility and the Thurso South substation shall be installed and kept underground, with finalised connection details to avoid tree felling, or damage to their associated root protection areas, wherever possible, with any impacts to be quantified and the finalised connection routing and construction details to be submitted to, and approved in writing by the Planning Authority.

Reason: In the interest of local amenity and environmental protection.

- 3. No development shall commence, with the exception of site investigation and ground enabling works, until the following details have been submitted to and approved in writing by the Planning Authority:
 - a) details of the make, model, design, power rating, dimensions and rating level of noise of all plant, machinery or equipment to be installed or operated in association with this development, with all equipment not exceeding 30dB LAeq,1hr. The Rating Level should be calculated in accordance with BS 4142: 2014: Methods for rating and assessing industrial and commercial sound.

Thereafter, the facility shall be installed and operate in accordance with these approved details.

Reason: In the interest of neighbouring residential amenity.

4. The main northern elevation roller shutter door shall remain closed whilst the facility is operational and noise arising from this development, when measured and/or calculated as an Leq,5min, in the 100Hz one third octave frequency band must not exceed 30 dB, at the curtilage of any noise sensitive premises.

Reason: In the interest of neighbouring residential amenity.

5. Prior to the operation of the facility, a Compliance Monitoring Plan demonstrating how operational noise compliance monitoring would be undertaken in the event of a complaint arising, shall be submitted to and approved in writing by the Planning Authority. Thereafter, within 21 days from receipt of a written request of the Local Authority, following a complaint to it alleging noise disturbance at a dwelling, the operator shall, at its expense, employ an independent consultant approved by the Local Authority to assess the level of noise immissions from the development at the complainant's property (or a suitable alternative location agreed in writing with the Local Authority).

Reason: In the interest of neighbouring residential amenity.

6. Prior to the operation of the facility, details of any external lighting, or any externally visible internal lighting, shall be submitted to and approved in writing with the Planning Authority. The lighting shall thereafter be constructed and maintained in accordance with the approved details.

Reason: In the interests of visual amenity, to minimise light pollution and to ensure the development does not have an adverse impact on nocturnal animals.

- 7. (1) No development shall commence until a detailed planting and maintenance specification has been prepared by a suitably qualified forestry consultant and submitted to, and approved in writing by, the Planning Authority.
 - (2) a suitably qualified forestry consultant must be employed at the applicant's expense to ensure that the approved planting is implemented and subsequently maintained to the agreed standard, and that existing trees to be retained are subject to tree protection fencing during construction. Stages requiring supervision are to be approved by the Planning Authority and certificates of compliance for each stage are to be submitted for approval.
 - (3) No development shall commence until a work instruction has been issued to the forestry consultant to enable them to undertake the necessary supervision unhindered for the duration of the project.
 - (4) All planting, seeding or turfing as may be comprised in the approved details shall be carried out in the first planting and seeding seasons following the commencement of development, unless otherwise agreed in writing by the Planning Authority.
 - (5) All stock field gates within the site must remain unlocked, or otherwise side pedestrian gates to BS5709 must be provided.

Reason: In order to ensure that a high standard of landscaping is achieved appropriate to the location of the site and to maintain public access rights.

8. Prior to the operation of the facility, site landscaping ground re-grading works shall have been completed, including the formation of landscaping bunds to the north, east and south of the facility's perimeter, in line with the approved application drawings.

Reason: In order to ensure that a high standard of landscaping is achieved, appropriate to the location of the site and to ensure suitable operational noise attenuation measures are in place.

9. No development or work (including site clearance) shall commence until proposals for an archaeological watching brief to be carried out during site clearance and excavation works, have been submitted to, and approved in writing by, the Planning Authority. Thereafter, the watching brief shall be implemented as approved.

Reason: In order to protect the archaeological and historic interests of the site.

- 10. No development shall commence until a Construction Environment Management Document (CEMD) has been submitted to and approved in writing by the Planning Authority, in consultation with SEPA. Thereafter the construction of the development shall only be carried out in accordance with the approved CEMD, subject to any variations approved in writing by the Planning Authority. The CEMD shall include details of:
 - a) the phasing and timing of construction works;
 - b) the formation of temporary construction compounds, access tracks and any areas of hardstanding;
 - c) any temporary site compound including temporary structures / buildings, fencing, parking and storage provision to be used in connection with the construction of the development;
 - d) the maintenance of visibility splays on the entrance to the site;
 - e) the method of construction and erection of the structures;
 - f) a Pollution Prevention Plan including: protection of the water environment, surface water drainage, maintaining a setback from the existing field drainage channel, bunding of oil and fuel storage areas, spills kits, no direct discharges of any foul waste with the provision of a septic tank, waste management, dust suppression, speed limit restrictions;
 - g) groundwater and water quality monitoring, the results of which must be submitted to the Planning Authority and SEPA;

- h) measures for minimising soil disturbance, storage and management, with all soils to remain on site and utilised in landscaping;
- i) temporary site illumination during construction;
- surface treatments and the construction of all hard surfaces and access roads between each element of the proposed development This shall include details of the roads construction with a dark nonreflective finish with details of the chemical properties of any and all imported stone provided;
- k) routeing of onsite cabling;
- I) emergency procedures and pollution response plans;
- m) details of wheel washing facilities to be provided at an appropriate point within the site adjacent to the access from the trunk road so as to prevent vehicles depositing debris on the trunk road;
- n) cleaning of site entrances, site tracks and the adjacent public highway and the sheeting of all HGVs taking spoil or construction materials to/from the site to prevent spillage or deposit of any materials on the highway;
- timetable for post construction restoration / reinstatement of the temporary working areas, the construction compound and reducing the extent of the access track to reflect site operational requirements;
- p) working practices for protecting nearby residential dwellings, including measures to control construction noise and vibration; and
- q) the location of tree protection fencing to be erected between the development site and trees to be retained.

Reason: To ensure a satisfactory level of environmental protection and to minimise disturbance to local residents during the construction process.

- 11. No development shall commence until the Planning Authority has approved in writing the terms of appointment by the applicant of an independent Ecological Clerk of Works (ECoW). The terms of appointment shall:
 - a) impose a duty to monitor compliance with the ecological and hydrological commitments provided in the Environmental Appraisal, February 2021 and its updated Chapter 9: Flood Risk and Drainage, April 2021, and other information lodged in support of the application including but not limited to the Construction and Environmental Management Plan (CEMP) and other plans approved. This shall include, but is not limited to: undertaking a further pre-construction breeding bird and protected species site walkover survey; overseeing site construction tree protection and site lighting requirements to ensure lighting is directed away from trees to reduce disturbance to

any foraging bats; and to monitor compliance with all pollution prevention measures including water quality monitoring ("the ECoW Works");

- require the ECoW to report to the applicant's nominated construction project manager any incidences of non-compliance with the ECoW Works at the earliest practical opportunity;
- c) require the ECoW to submit a report every two months to the Planning Authority and Planning Monitoring Officer, or monthly at the further written request of the Planning Authority, summarising progress with the development and environmental works undertaken on site;
- d) have power to stop to the job / activities being undertaken within the development site when ecological interests dictate and / or when a breach or potential breach of environmental legislation occurs to allow for a briefing of the concern to the applicant's nominated construction project manager; and
- e) require the ECoW to report to the Planning Authority any incidences of non-compliance with the ECoW Works at the earliest practical opportunity.

The ECoW shall be appointed on the approved terms throughout the period from pre-construction survey work ahead of the Commencement of Development, throughout any period of construction activity and during any period of post-construction decommissioning and restoration.

No later than 12 months prior to decommissioning of the development or the expiration of this consent (whichever is the earlier), the applicant shall submit details of the terms of appointment by the applicant of an independent ECoW throughout the decommissioning, restoration and aftercare phases of the Development to the Planning Authority for approval in consultation with NatureScot and SEPA. The ECoW shall be appointed on the approved terms throughout the decommissioning, restoration and aftercare phases of the development.

Reason: To secure effective monitoring of and compliance with the environmental mitigation and management measures associated with the Development.

12. No development shall commence until details of the proposed means of access onto the trunk road have been submitted to, and approved in writing by, the Planning Authority in consultation with Transport Scotland. Such details shall include, but not be limited to: the provision of suitable junction geometry information, achieving visibility splays of 215m x 4.5m, site levels, drainage, surfacing and kerbing specifications, and the positioning and type of access gate. Thereafter, no other development shall commence until the site access has been formed as approved.

Reason: To ensure that an adequate level of access is timeously provided for the development; in the interests of road safety and amenity.

- 13. No development shall commence until a Construction Traffic Management Plan (CTMP) to manage all construction traffic with the exception of abnormal indivisible loads, has been submitted to and approved in writing by the Planning Authority, in consultation with the local Roads Authority, Transport Scotland, the Police and all affected Community Councils. The CTMP shall be carried out as approved in accordance with the timetable specified within the approved CTMP. The CTMP shall include:
 - a) identification of the routes to site for general construction traffic and details of the number and type of vehicle movements anticipated on these routes during the construction period;
 - b) scheduling and timing of movements;
 - c) traffic management measures on the routes to site for construction traffic. Measures such as temporary speed limits, suitable temporary signage, road markings and the use of speed activated signs and banksman/escort details should be considered. During the delivery period of construction materials any additional signing or temporary traffic control measures deemed necessary due to the size or length of any loads being delivered or removed must be undertaken by a recognised QA traffic management consultant, to be approved by the Local Roads Authority and Transport Scotland before delivery commences;
 - d) measures to mitigate the impact of general construction traffic on the routes to site following detailed assessment of the relevant roads;
 - e) a procedure for the regular monitoring of road conditions and the implementation of any remedial works required during the construction period;
 - f) measures to ensure that all affected public roads are kept free of mud and debris arising from the development;
 - g) the provision of a wear and tear agreement under Section 96 of the Roads (Scotland) Act 1984 under which the developer will be responsible for the repair of any damage to the local road network attributable to construction related traffic. As part of the agreement, pre-start and post construction road condition surveys must be carried out by the developer to the satisfaction of the Roads Authority. It will also require the submission of an appropriate financial bond acceptable to the Council in respect of the risk of any road reconstruction works:
 - h) a timetable for implementation of the measures detailed in the CTMP;
 - i) provisions for emergency vehicle access; and
 - j) identification of a nominated person to whom any road safety issues can be referred.

Reason: In the interests of road safety.

14. No delivery of abnormal indivisible load (AIL) shall be made to site until an Abnormal Indivisible Load Construction Traffic Management Plan (AIL-CTMP) has been submitted to, and approved in writing by, the Planning Authority, in consultation with the local Roads Authority, Transport Scotland, the Police and all affected Community Councils. The AIL-CTMP shall provide a detailed protocol for the delivery of AILs, including details of their proposed routing on the local and trunk road network, any accommodation measures required, including the removal and replacement of street furniture, junction widening, and traffic management, with the protocol being prepared in consultation with all interested parties. The AIL-CTMP shall thereafter be carried out as approved.

Reason: In the interests of road safety and to ensure that abnormal loads access the site in a safe manner.

- 15. Prior to the operation of the facility, a site Operational Management Plan shall be submitted to, and approved in writing by the Planning Authority. This plan shall detail:
 - a) landscape management and drainage maintenance arrangements;
 - b) operation water quality monitoring to be undertaken 1 year post operation of the facility thereafter, at 5 yearly intervals until completion of site decommissioning with the findings to be reported to the Planning Authority and SEPA; and
 - c) the provision and maintenance of all 8no. proposed staff parking areas, including the provision of one disabled parking space and at least one electronic vehicle charging point.

Reason: In the interest of environmental amenity, maintaining water quality, particularly for the River Thurso Special Area of Conservation, and provision of adequate parking and charging facilities.

- 16. (1) The operator shall, at all times after the first commissioning of the development, record information regarding the details of the facilities use to stabilise the grid transmission network, inclusive of dates and times of any blackout interventions and assisted grid restart events, and retain the information in perpetuity. The information shall be made available to the Planning Authority within one month of any request by them.
 - (2) No development shall commence unless and until a decommissioning, restoration and aftercare strategy has been submitted to, and approved in writing by, the Planning Authority in consultation with NatureScot and SEPA. The strategy shall outline measures for the decommissioning of the Development and restoration and aftercare of the site, and shall include proposals for the removal of the Development, the treatment of ground surfaces, the management and timing of the works and environmental management provisions.

- (3) In the event that the development is no longer operational for a period of 24 months, or the operator, leaseholder and / or landlord advises that the development is no longer going to be operated, whichever is earliest, within the following 12 months a detailed decommissioning, restoration and aftercare plan, based upon the principles of the approved decommissioning, restoration and aftercare strategy, shall be submitted, and approved in writing by the Planning Authority, in consultation with NatureScot and SEPA. The detailed decommissioning, restoration and aftercare plan shall provide updated and detailed proposals, in accordance with relevant guidance at that time, for the removal of the Development, the treatment of ground surfaces, the management and timing of the works and environment management provisions which shall include (but is not limited to):
 - a) site waste management plan (dealing with all aspects of waste produced during the decommissioning, restoration and aftercare phases);
 - b) details of measures to be taken to prevent loose or deleterious material being deposited on the local road network, including wheel cleaning and lorry sheeting facilities, and measures to clean the site entrances and the adjacent local road network;
 - a pollution prevention and control method statement, including arrangements for the storage and management of oil and fuel on the site;
 - d) details of measures for minimising soil disturbance, storage and management;
 - e) a surface water management and treatment plan, including the undertaking of water quality monitoring;
 - f) temporary site illumination;
 - g) management and timing of the works; and
 - h) a traffic management plan to address any traffic impact issues during the decommissioning period.
- (4) The development shall be decommissioned, the site restored and aftercare undertaken in accordance with the approved plan.

Reason: To ensure that should the development no longer be required an appropriate mechanism is in place for decommissioning of the development.

- 17. No development shall commence until the Planning Authority has approved in writing the terms of appointment by the applicant of an independent and suitably qualified environmental consultant to assist the Planning Authority in monitoring compliance with the planning permission and conditions attached to this consent. The terms of Planning Monitoring Officer (PMO) appointment shall:
 - a) impose a duty to monitor compliance with the planning permission and conditions attached to this consent;

- b) require the PMO to submit a report at least every two months to the Planning Authority, or monthly at the further written request of the Planning Authority, summarising works undertaken on site; and
- c) require the PMO to report to the Planning Authority any incidences of non-compliance with the planning permission and conditions attached to this consent at the earliest practical opportunity.

The PMO shall be appointed on the approved terms throughout the period from the Commencement of Development to completion of post construction restoration works.

Reason: To enable the development to be suitably monitored to ensure compliance with the consent issued.

REASON FOR DECISION

All relevant matters have been taken into account when appraising this application. It is considered that the proposal accords with the principles and policies contained within the Development Plan and is acceptable in terms of all other applicable material considerations.

TIME LIMIT FOR THE IMPLEMENTATION OF THIS PLANNING PERMISSION

In accordance with Section 58 of the Town and Country Planning (Scotland) Act 1997 (as amended), the development to which this planning permission relates must commence within THREE YEARS of the date of this decision notice. If development has not commenced within this period, then this planning permission shall lapse.

FOOTNOTE TO APPLICANT

Initiation and Completion Notices

The Town and Country Planning (Scotland) Act 1997 (as amended) requires all developers to submit notices to the Planning Authority prior to, and upon completion of, development. These are in addition to any other similar requirements (such as Building Warrant completion notices) and failure to comply represents a breach of planning control and may result in formal enforcement action.

- 1. The developer must submit a Notice of Initiation of Development in accordance with Section 27A of the Act to the Planning Authority prior to work commencing on site.
- 2. On completion of the development, the developer must submit a Notice of Completion in accordance with Section 27B of the Act to the Planning Authority.

Copies of the notices referred to are attached to this decision notice for your convenience.

Accordance with Approved Plans and Conditions

You are advised that development must progress in accordance with the plans approved under, and any conditions attached to, this permission. You must not deviate from this permission without consent from the Planning Authority (irrespective of any changes that may separately be requested at the Building Warrant stage or by any other Statutory Authority). Any pre-conditions (those requiring certain works, submissions etc. prior to

commencement of development) must be fulfilled prior to work starting on site. Failure to adhere to this permission and meet the requirements of all conditions may invalidate your permission or result in formal enforcement action.

Flood Risk

It is important to note that the granting of planning permission does not imply there is an unconditional absence of flood risk relating to (or emanating from) the application site. As per Scottish Planning Policy (paragraph 259), planning permission does not remove the liability position of developers or owners in relation to flood risk.

Scottish Water

You are advised that a supply and connection to Scottish Water infrastructure is dependent on sufficient spare capacity at the time of the application for connection to Scottish Water. The granting of planning permission does not guarantee a connection. Any enquiries with regards to sewerage connection and/or water supply should be directed to Scottish Water on 0845 601 8855.

Septic Tanks and Soakaways

Where a private foul drainage solution is proposed, you will require separate consent from the Scottish Environment Protection Agency (SEPA). Planning permission does not guarantee that approval will be given by SEPA and as such you are advised to contact them direct to discuss the matter (01349 862021).

Local Roads Authority Consent

In addition to planning permission, you may require one or more separate consents (such as road construction consent, dropped kerb consent, a road openings permit, occupation of the road permit etc.) from the Area Roads Team prior to work commencing. These consents may require additional work and/or introduce additional specifications and you are therefore advised to contact your local Area Roads office for further guidance at the earliest opportunity. Failure to comply with access, parking and drainage infrastructure requirements may endanger road users, affect the safety and free-flow of traffic and is likely to result in enforcement action being taken against you under both the Town and Country Planning (Scotland) Act 1997 and the Roads (Scotland) Act 1984.

Further information on the Council's roads standards can be found at: http://www.highland.gov.uk/yourenvironment/roadsandtransport

Application forms and guidance notes for access-related consents can be downloaded from: http://www.highland.gov.uk/info/20005/roads_and_pavements/101/permits_for_working_on_public_roads/2

Mud and Debris on Road

Please note that it an offence under Section 95 of the Roads (Scotland) Act 1984 to allow mud or any other material to be deposited, and thereafter remain, on a public road from any vehicle or development site. You must, therefore, put in place a strategy for dealing with any material deposited on the public road network and maintain this until development is complete.

Construction Hours and Noise-Generating Activities

You are advised that construction hours of work associated with the approved development (incl. the loading/unloading of delivery vehicles, plant or other machinery), for which noise is audible at the boundary of the application site, has been conditioned. Work falling outwith these hours which gives rise to amenity concerns, or noise at any time which exceeds acceptable levels, may result in the service of a notice under Section 60 of the Control of Pollution Act 1974 (as amended). Breaching a Section 60 notice constitutes an offence and is likely to result in court action. If you wish formal consent to work at specific times or on specific days, you may apply to the Council's Environmental Health Officer under Section 61 of the 1974 Act. Any such application should be submitted after you have obtained your Building Warrant, if required, and will be considered on its merits. Any decision taken will reflect the nature of the development, the site's location and the proximity of noise sensitive premises. Please contact env.health@highland.gov.uk for more information.

Protected Species – Halting of Work

You are advised that work on site must stop immediately, and NatureScot must be contacted, if evidence of any protected species or nesting/breeding sites, not previously detected during the course of the application and provided for in this permission, are found on site. For the avoidance of doubt, it is an offence to deliberately or recklessly kill, injure or disturb protected species or to damage or destroy the breeding site of a protected species. These sites are protected even if the animal is not there at the time of discovery. Further information regarding protected species and developer responsibilities is available from NatureScot: https://www.nature.scot/professional-advice/protected-areas-and-species/protected-species

Signature: Dafydd Jones

Designation: Acting Head of Development Management – Highland

Author: Peter Wheelan

Background Papers: Documents referred to in report and in case file.

Relevant Plans: Plan 1 - Site Location Plan (Fig 1: PL TH 001, Rev 2)

Plan 2 - Existing Site Layout Plan (Fig 6: PL TH 006, Rev 1)

Plan 3 - Detailed Proposed Site / Roof Plan (Fig 2: PL TH 002, Rev 4)

Plan 4 - Site Levels (Fig 7: PL TH 007, Rev 3)

Plan 5 - Site Wide Elevations (Fig 9: PL TH 009, Rev2)

Plan 6 - Proposed Building Elevations (Fig 3: PL TH 003, Rev2)

Plan 7 - Proposed Building Floor Plan (Fig 5: PL TH 005, Rev1)

Plan 8 - Landscape Proposals (Fig 8.4: 5201925-SWECO-LS-DR-004,

Rev1)

Plan 9 - Viewpoint 1 (A9, Adjacent to the Site) Existing View (Fig 2a)

and Wireline Overlay Year 1 (Fig 3a)

Plan 10 - Viewpoint 1 (A9, Adjacent to the Site) 50mm Photomontage

(Year 1) (Fig 4)

Plan 11 - Viewpoint 1 (A9, Adjacent to the Site) 50mm Photomontage (Year 10) (Fig 6)

Appendix 1 – Appropriate Assessment

While the responsibility to carry out the Appropriate Assessment rests with the Council, advice contained within Circular 6/1995 is that the assessment can be based on the information submitted from other agencies. In this case, the Appropriate Assessment has not been informed by any information supplied by NatureScot, however, has been guided by the information provided by the applicant (including a Habitat Regulations Appraisal) and various published information.

River Thurso SAC

The proposal is likely to have a significant effect on the qualifying interests of the River Thurso SAC being Atlantic salon (salmo salar). Further information on the site's qualifying interests and their conservation objectives can be found via Sitelink at: https://sitelink.nature.scot/site/8368

Highland Council Appraisal of the Proposal

- The proposal is not directly connected with or necessary to site management for conservation;
- The proposal is likely to have a significant effect on the site either individually or in combination with other plans or projects; and therefore;
- An Appropriate Assessment of the implications (of the proposal) for the site in view of that site's conservation objectives is provided below.

The impacts on the River Thurso SAC are considered for the proposed construction, 30+ year operational deign life, and decommissioning stages of the proposed grid stabilisation facility. The applicant has undertaken an Environmental Appraisal which considers connectivity with the adjacent SAC in terms of surface water discharges from site and airborne dust, protected species and their associated habitat.

An extended Phase 1 habitat survey was undertaken on the site and up to 250m from the site during August 2020 which found that the unnamed watercourse connecting the site to the River Thurso is unsuitable for Atlantic salmon spawning and adult feeding. There however remains a risk that pollution events could occur during the construction of the grid stability facility and from sedimentation of the river via the unnamed watercourse in the absence of mitigation.

Mitigation measures to manage the discharge of surface water from the site, including use of a swale and surface water attenuation pond, with foul water to be managed via use of a septic tank and no new outfalls being proposed into the River Thurso or elsewhere. Pollution prevention measures are also to be put in place, including bunding of fuel stores and provision of spill kits. Dust management measures will also be deployed as per the mitigation measures set out within a proposed Construction Environmental Management Plan, which includes a Pollution Prevention Plan.

The appointment of an ECoW is also to be conditioned to undertake protected species surveys and advise on the implementation of the Construction Environmental Management Document, with water quality monitoring to be undertaken during construction, operation and decommissioning.

The mitigation measures set out within the Environmental Appraisal, with its pertinent recommendations being transposed into the planning conditions, as well as additional water quality monitoring requirements stipulated in the planning conditions, are anticipated to be sufficient to address any significant risk and avoid an impact on the integrity of the designated site and its qualifying features.

Overall, it can be therefore concluded that while likely significant effects have been identified, there will not be an adverse effect on site integrity of the River Thurso SAC providing the mitigation set out within this appropriate assessment are applied.

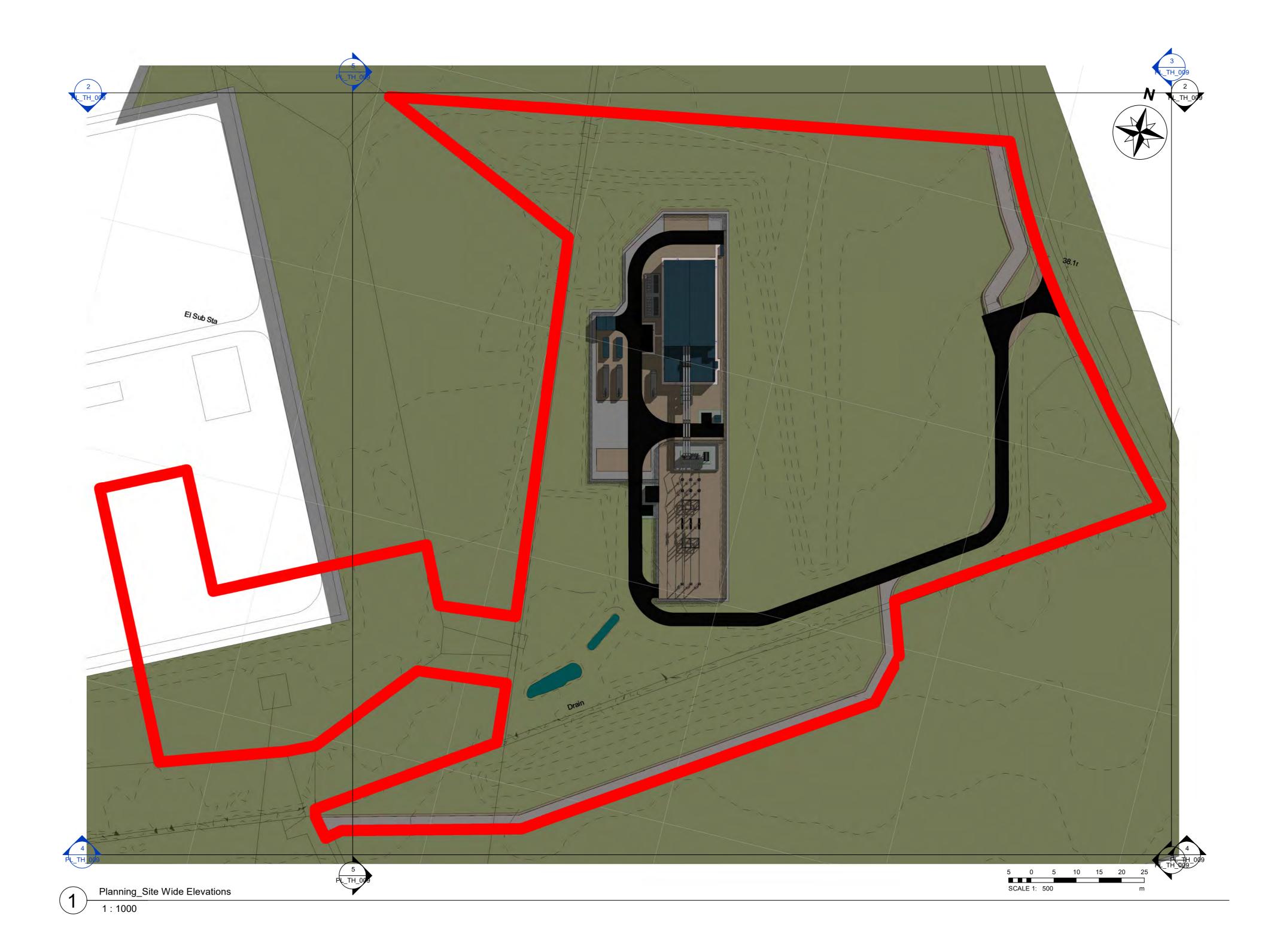


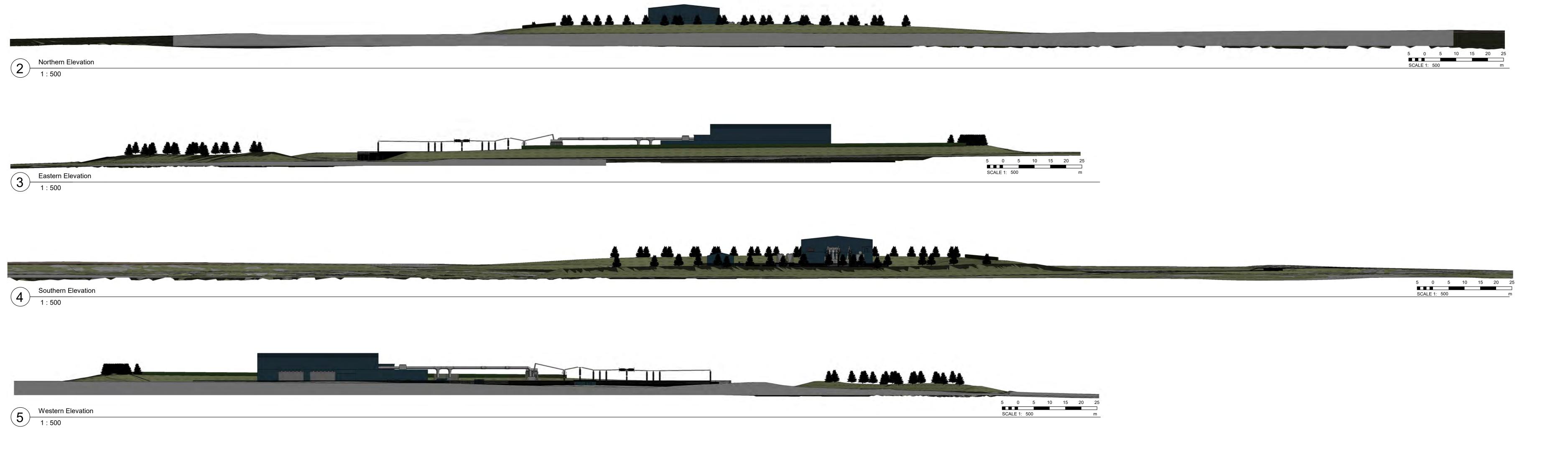






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SHEET NOTES

NOTES:

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ECT NAME

Thurso South Grid Stability

Thurso South Grid Stability KW14 8YH

Site Wide Elevations
Figure 9

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1:500 23/12/2020 Author Checker Approver

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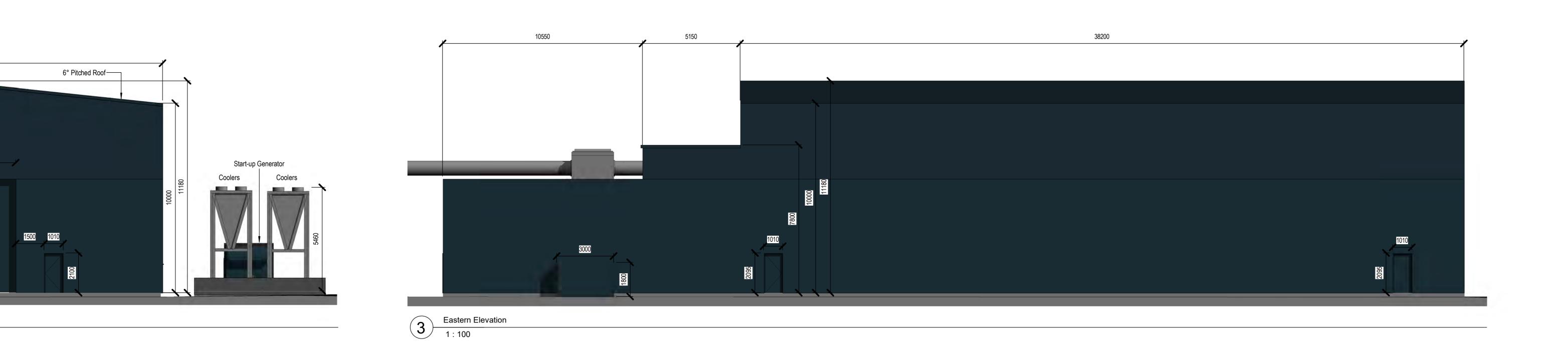
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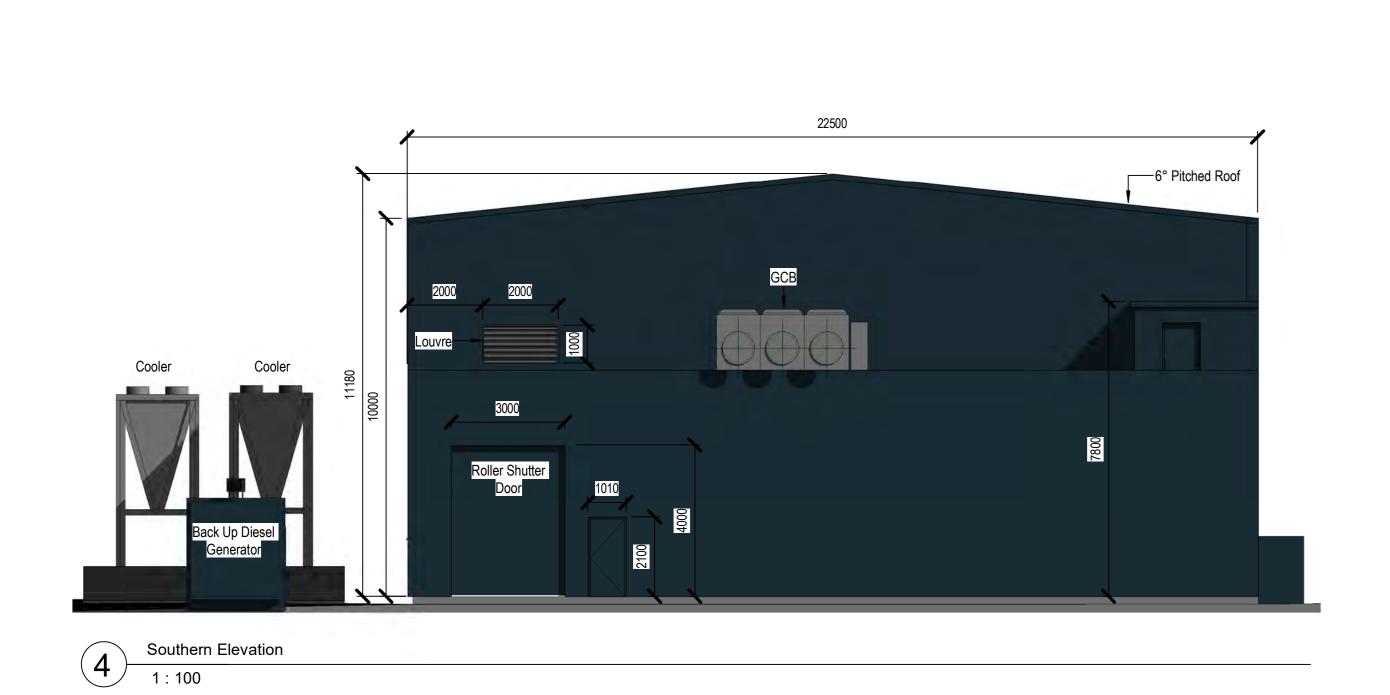
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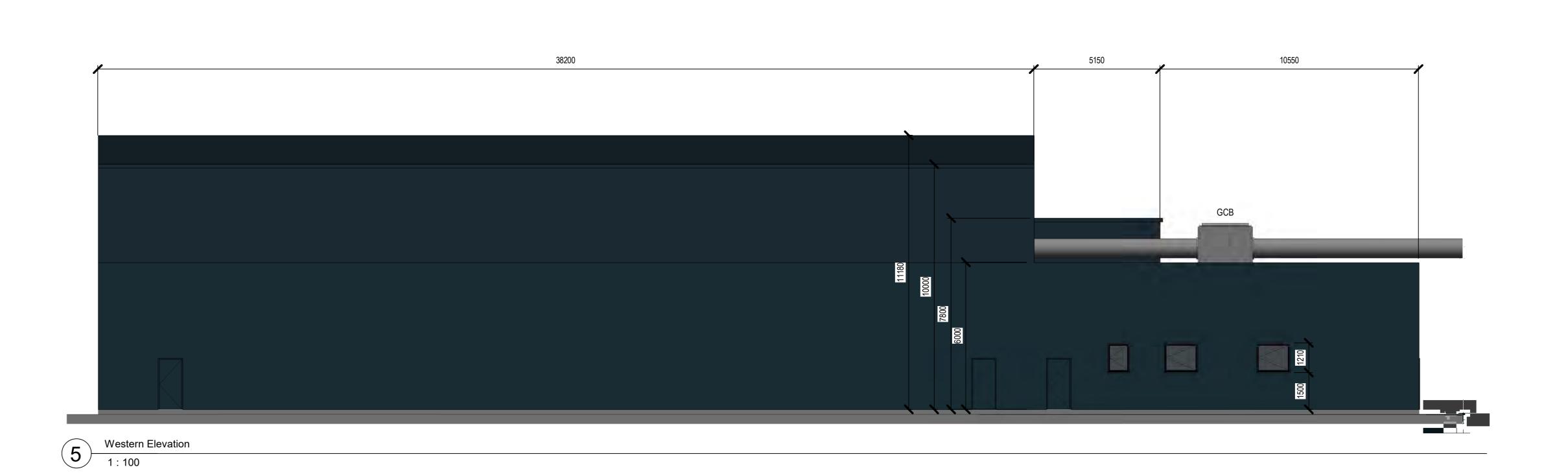


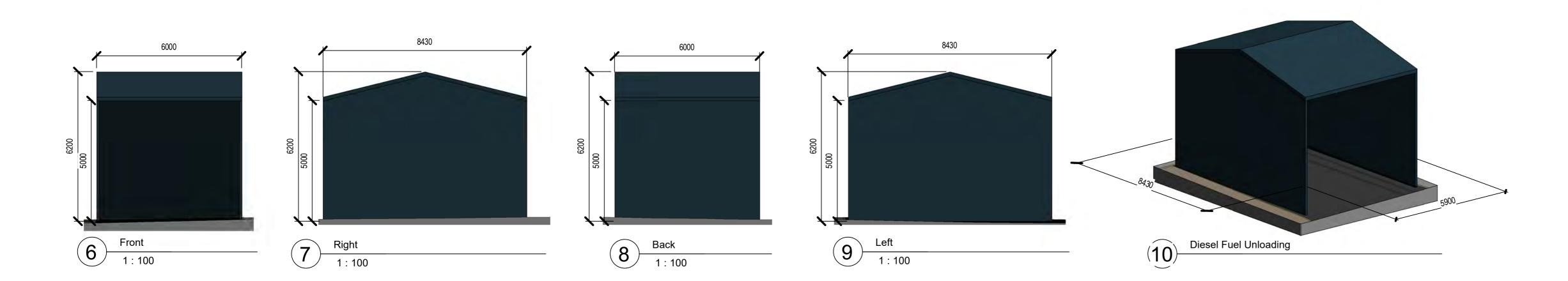
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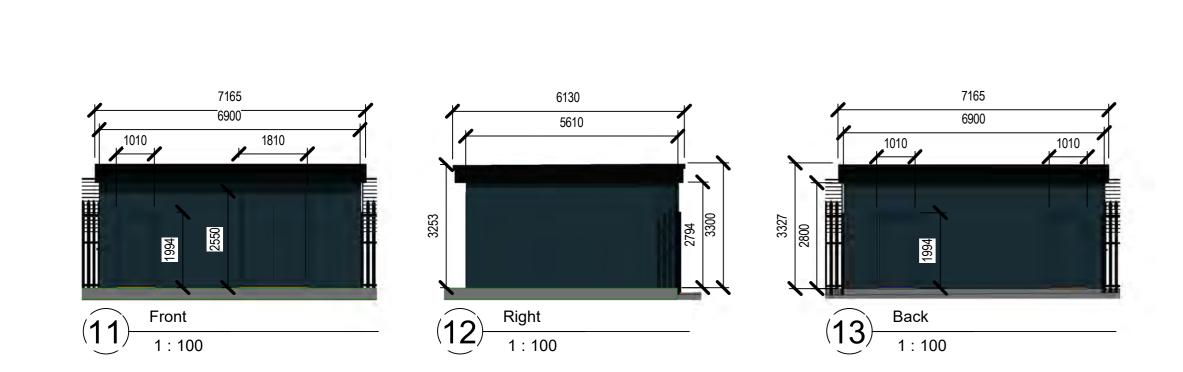


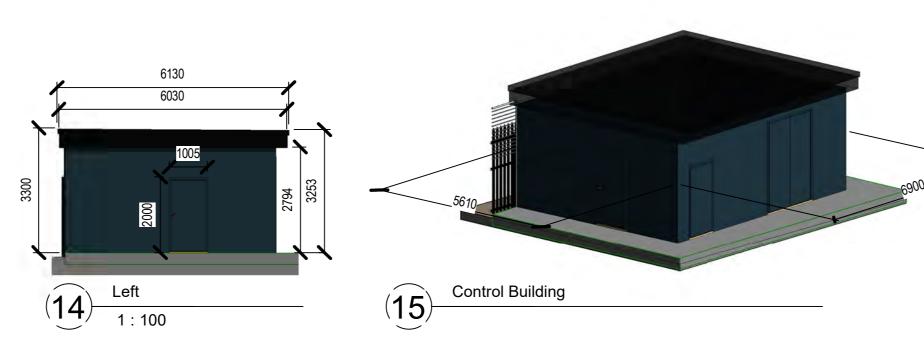


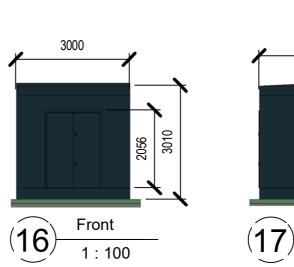
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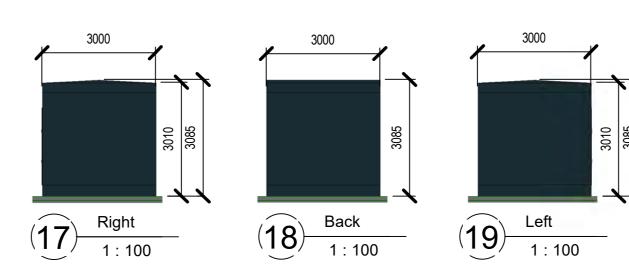


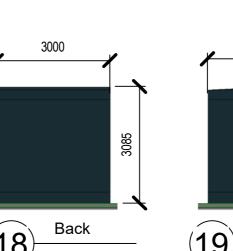


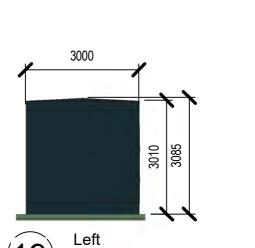


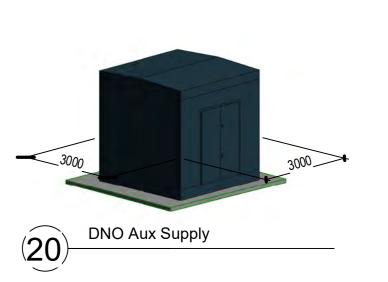












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SHEET NOTES

ALL BUILDINGS ARE RAL 240 20 10 - DNO AUX SUPPLY IS GRP - ALL OTHER BUILDINGS ARE "PROFILED METAL SHEET"

BUILDING MATERIALS

Proposed Building Elevations Figure 3

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Thurso South Grid Stability KW14 8YH

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PROJECT NAME

Thurso South Grid Stability KW14 8YH

Proposed Building Floor Plan Figure 5

PROJECT STATUS

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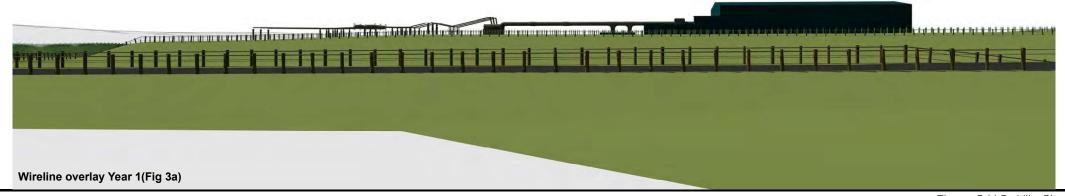


IMAGES FOR LANDSCAPE ASSESSMENT



VIEWPOINT 1 - A9, Adjacent to the Site (Fig 2)

Distance to proposed development 20metres Camera: Canon EOS 5D MkIII Focal length: 50mm vertical (27°) x 28mm horizontal (65.5°) Camera height: 1.5m Date: 26/11/20 Time: 12:18





VIEWPOINT 1 - A9, Adjacent to the Site (Fig 4)
When viewed at a comfortable arm's length (approx 500mm), this printed image is representative of our detailed central vision, but is not representative of scale and distance.

Distance to proposed development 20metres Camera: Canon EOS 5D MkIII Focal length: 50mm vertical (27°) x 50mm horizontal (39.6°) Camera height: 1.5m Date: 26/11/20 Time: 12:18



VIEWPOINT 1 - A9, Adjacent to the Site (Fig 6)
When viewed at a comfortable arm's length (approx 500mm), this printed image is representative of our detailed central vision, but is not representative of scale and distance.

Distance to proposed development 20metres Camera: Canon EOS 5D MkIII Focal length: 50mm vertical (27°) x 50mm horizontal (39.6°) Camera height: 1.5m Date: 26/11/20 Time: 12:18