Agenda Item	6.3
Report No	PLN/015/26

HIGHLAND COUNCIL

Committee: North Planning Applications Committee

Date: Wednesday 11th March 2026

Report Title: 25/02861/S36: Boralex Limited

Limekiln Battery Energy Storage System (BESS) - Construction and operation of a proposed Battery Energy Storage System (BESS) (over 50 MW) and an extension to the existing Limekiln Wind Farm Substation, associated infrastructure, access and ancillary works.

Report By: Area Planning Manager – North

Purpose/Executive Summary

Description: Limekiln Battery Energy Storage System (BESS) - Construction and operation of a proposed Battery Energy Storage System (BESS) (over 50 MW) and an extension to the existing Limekiln Wind Farm Substation, associated infrastructure, access and ancillary works.

Ward: 02 – Thurso and North West Caithness

Development category: National Development (Section 36 Application)

Reason referred to Committee: Section 36 Application

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 **RAISE NO OBJECTION** to the application as set out in section 11 of the report

1. PROPOSED DEVELOPMENT

1.1 The Highland Council has been consulted by the Scottish Government's Energy Consents Unit (ECU) on an application made under Section 36 of the Electricity Act 1989 (as amended) for the installation of a battery energy storage system and associated infrastructure with a generating capacity of up 70MW. In addition, the application also proposes an extension to the existing Limekiln Wind Farm Substation.

1.2 The proposed development comprises containerised battery units with a total export storage capacity of up to 70MW, and ancillary infrastructure, consisting of:

- Up to 90 battery storage containers approximately 6.0 m long, 2.5 m wide and 3.0 m high;
- Electrical substation extension and associated infrastructure;
- Power Conversion Units (PCS's)
- MV/LV PCS transformers
- Control and switchgear building;
- MV/LV auxiliary transformer;
- Underground cable connection to 132 kV substation extension;
- 132 kV Breaker, 132/33 kV transformer and 33 kV breaker at the substation extension;
- Spare parts containers;
- Office / welfare facilities;
- Fire suppression systems;
- Water storage tanks;
- Back-up generator;
- Palisade fencing typically 3m high;
- CCTV cameras, motion activated lighting and fencing;
- Site access and internal access tracks;
- Biodiversity mitigation and enhancement;
- Drainage (including SuDS);
- Temporary construction compound; and
- Maintenance vehicle parking

1.3 The proposed BESS will collect and store energy from the electricity network and release energy to the network during times of peak demand. It is proposed to connect the BESS via an underground cable connection to the proposed 132 kV substation extension of the existing Limekiln Wind Farm Substation.

1.4 Due to the installed capacity, this proposal falls under the provisions of the Electricity Act 1989 and is classed as National Development by National Planning Framework 4 (NPF4).

1.5 Whilst public consultation for Section 36 applications is not mandatory, the applicant committed to a proportionate programme of pre-application community consultation and took account of feedback received through that process in finalising the proposed development. The applicant has undertaken two rounds of public consultation. The applicant initially presented draft proposals for further development on the Limekiln Wind Farm site with a battery energy storage system to the Caithness West Community Council meeting in March 2026. Following the submission of the

Proposal of Application Notice (PoAN), the applicant informed the community council as well as all Highland Council ward members, the local MSP and MP, advising of the proposals and public consultation events. In April 2025, the applicant also distributed 410 information postcards to addresses of the local community, providing an invitation to the public consultation events, as well as details of the proposals. In addition, a website has been created to allow further online consultation as well as advertisements within local newspapers and the provision of a freephone telephone number for direct enquires. Two rounds of in-person public consultation presenting the proposals were held. The first round on 17th April in Reay Village Hall with a follow up meeting on the 22nd of May. In summary, the feedback received included:

- The local area has a growing number of BESS proposals and still a high level of concern around fire risk.
- Access to the core path during construction concerns, with discussions regarding proposed temporary diversion routes.

1.6 The applicant made use of the Council's Pre-Application Advice Service for Major Developments in November 2024 (24/04672/PREMAJ). This concluded based on the submitted information that it was likely that the Planning Authority would be able to support the principle of BESS at the proposed location. In this instance the proposal's impact on the surrounding habitat, forestry, and biodiversity was advised to be a key determining issue. The report set out that further detail will be required in relation to a transport assessment, trunk road access, and construction traffic management; flood risk and drainage matters; impacts on ecology and the natural environment including nearby designated sites and biodiversity enhancement; noise impacts; and fire risk management amongst other considerations. A key issue will be contingency plans for the emergency management of fire water from the site. If used fire water cannot be contained within the site, then measures must be in place for removing fire water from site.

1.7 A formal EIA Screening Opinion was requested from the Energy Consents Unit (ECU), acting on behalf of Scottish Ministers, in April 2025. A Screening Opinion (ref ECU00006154) was issued by the ECU in May 2025, concluding that an EIA was not required for the proposed development.

1.8 The application is supported by the following documents:

- Supporting Environmental Information Report
  - Introduction
  - Site Description
  - Description of the Proposed Development
  - Forestry
  - Landscape and Visual Appraisal
  - Ecology
  - Ornithology
  - Cultural Heritage Desk Based Assessment
  - Geology and Peat
  - Hydrology and Hydrogeology
  - Noise
  - Transport Statement & Construction Traffic Management Plan
  - Socioeconomics

- Outline Battery Safety Management Plan
- Pre-Application Consultation Report and Appendices
- Habitat Management Plan
- Planning Statement
- Forest Plan Amendment Letter – Scottish Forestry
- Technical Advice Note
- Agent Response to Ecology

1.9 Numerous variations to the submitted plans have occurred throughout the assessment process in response to consultee and case officer queries, with the latest amendments received on the 24th of November 2025.

2. SITE DESCRIPTION

2.1 The site covers a total area of 32 hectare and is located within the wider footprint of Limekiln Wind Farm, south of Reay, Caithness, consisting of a combination of wind farm infrastructure and commercial forestry. The large coniferous woodland plantation which entails the existing wind farm infrastructure, is known as Limekiln, where the operational Limekiln and Limekiln Extension Wind Farms (together known as Limekiln Wind Farm) are operational. The underlying landform comprises relatively low and gently undulating hills characteristic of the wider sweeping moorland. The wider Limekiln landform rises gradually, while the sites of the proposed BESS and Substation Extension are situated at approximately 90m AOD and 80m AOD respectively. The wider landform follows a south to north alignment marked by the orientation of the low hill ridges and intermediate valleys with the flow of the watercourses north.

2.2 The proposed BESS compound would be located on the reinstated temporary construction compound which was used for the construction of Limekiln Wind Farm. The proposed Substation Extension would sit immediately to the north of the operational Limekiln Wind Farm Substation. Access to the BESS compound and proposed Substation extension would be via the existing suite of wind farm tracks. The immediate land uses surrounding the proposals comprise a combination of operational wind energy infrastructure and commercial coniferous forestry.

2.3 The location of the proposals within the Limekiln coniferous plantation, creates a high degree of screening and separation from receptors in the wider area, with the nearest settlement of Reay approximately 3km to the north of the proposed BESS and 2km north of the proposed substation extension. The closest main and minor roads are the A836, and the Reay to Shebster road, which are also approximately 3km from the Proposed Development and with no visibility. The recognised Limekiln Forest Core Path (CA11.03) is located within the application site boundary. The site lies in the catchment of the Reay Burn to the west and the Achvarasdal Burn to the east, which both flow in a northerly direction before discharging into the North Sea at Sandside Bay. The proposed Substation Extension location is approximately 80m east of a tributary of the Reay Burn at its closest extent, and the proposed BESS site is approximately 85m south of a tributary of the Achvarasdal Burn at its closest extent.

2.4 There are no residential properties located within the close proximity to the proposed BESS compound and substation extension, with the nearest properties and

separation distances to the BESS proposals recognised as Loanscorribest 1.9km, Borlum House 2km, Achins 2.9km, and Milton 2.3km. It is understood that the nearest property to the proposed substation extension is 1.3km, given the 630m separation distance between the existing substation and BESS compound.

Environmental Designations and Habitats

2.5 The site does not form part of any statutory or non-statutory designated sites for nature conservation.

The following international designations are within 5km of the site:

- North Caithness Cliffs Special Protection Area (SPA) approximately 1.3km to the north of the proposals, designated for supporting very large populations of breeding seabirds such as fulmar, kittiwake, guillemot and peregrine.
- Caithness and Sutherland Peatlands Special Area of Conservation (SAC), Caithness and Sutherland Peatlands Special Protection Area (SPA) and Ramsar Site, located 2.03km to the southwest, designated for its peatland and freshwater habitats, marsh saxifrage, otter, peatland breeding waders, waterfowl and raptors.
- Broubster Leans Special Area of Conservation (SAC) located approximately 4.6km to the southeast, designated for its internationally important transition mires, quaking bogs, and wetland habitats.
- Caithness Lochs Special Protection Area located approximately 4.6km to the southeast, its Greenland white-fronted geese, whooper swan, and greylag geese.
- The Flow Country World Heritage Site approximately 4.8km west of the proposed development, protected for its extensive blanket bog.
- North Caithness Cliffs Special Protection Area (SPA) approximately 1.3km (from the access) to the north of the proposals, designated for supporting very large populations of breeding seabirds such as fulmar, kittiwake, guillemot and peregrine.

The following national designations are within 5km of the site:

- Sandside Bay Site of Special Scientific Interest (SSSI), closest to site boundary at 35m from the northern point of the access track, is located approximately 2.3km from the nearest area of the proposal to be impacted by construction. Designated for Sand Dunes.
- Red Point Coast Site of Special Scientific Interest (SSSI), approximately 1.18km north of the access track part of the site, designated for Maritime Cliff Terrestrial Habitat and Scottish primrose Primula scotica Biological Feature.
- East Halladale Site of Special Scientific Interest (SSSI) located 2.5km to the southwest and is designated for its Blanket Bog.
- Broubster Leans Site of Special Scientific Interest (SSSI), located 4.41km to the east, designated for its Annex I habitats, such as Transition Mires and Quaking Bogs.
- Loch Caluim Flows Site of Special Scientific Interest (SSSI) located approximately 5km to the south of the proposals, protected for its nationally and internationally important for its blanket bog habitat and the breeding birds.

2.6 The site and immediate surroundings comprise several habitats in the form of coniferous plantation woodland, recently felled coniferous woodland, neutral grassland and wet heath, with wider habitats from the site mainly plantation woodland and similar shrub heath.

2.7 The proposals lie within a single commercial conifer plantation, predominantly comprising Sitka spruce and Lodgepole pine. The Limekiln Forest area includes 300.21 hectares of open ground and 134.86ha of peatlands designated as SSSI, SAC and SPA. The forest is adjacent to the Broubster forest (1,379 hectares) and Achaveilan North Forest (116 hectares) within a planted coniferous complex totalling approximately 3,120 hectares. There are no ancient woodland sites identified. The wider Limekiln Plantation Long Term Forest Plan (LTFP) was approved by Scottish Forestry on 28th August 2017 and covers 1,240.08 ha. The LTFP has already been amended taking account of the Limekiln Wind Farm as a consented development.

Landscape Designations, Wild Land and Landscape Character

2.8 The proposed development is situated at a sufficient distance from any nearby national and local landscape designations. The closest designation to the site is the Farr Bay, Strathy and Portskerra Special Landscape Area (SLA) which lies approximately 8 km to the north-west, while the Dunnet Head SLA lies over 20km to the east. In terms of Wild Land Areas (WLA), the East Halladale Flows WLA is situated in closer proximity to the site, with the northern stretch of this designation situated approximately 1.7km to the west of the site.

2.9 The site is located within the Sweeping Moorland and Flows Landscape Character Type (LCT) covering an expansive area stretching from Strath More in the west, to the east coast at Wick, and from Strath Fleet in the south, to the north coast at Reay. This landscape consists of a vast, open, and gently undulating ground, according with areas of blanket bog and supports a diverse range of wet heath, grassland and mire, with the presence of occasional isolated hills. The Farmed Lowland Plain LCT is situated to the north of the proposals, largely, open, low-lying, and gently undulating landscape characterised by intensive agriculture, scattered settlements, and, frequently, a strong coastal influence.

2.10 The proposed development is found within the Limekiln coniferous plantation, on the northern fringe of the Sweeping Moorland and Flows LCT. This area is characterised by the enclosure of forestry in contrast to the openness of the core flows and moorland to the south. Furthermore, the rotational felling and restocking presents a heavily managed and modified landscape in contrast to the natural landscape of the flows. Limekiln Wind Farm is also located in this LCT making large-scale energy development an established feature.

Built Heritage

2.11 There are no designated or non-designated heritage assets within the application site boundary, with 3 designated heritage assets recognised to be within 2km of the proposals. These comprise Clach Clais an Tuire standing stone (SM441), Achvarasdal House Standing Stones (SM421) and Achvarasdal House Broch (SM514). There are also 113 non-designated heritage assets within the surrounding 2km, predominantly of which are found to the north of the application site, with 7 non-

designated heritage assets found to the south. The closest of which is MHG738 Borag Knowe cairn, recorded as being a ‘circle of stones' on the summit of Borag Knowe surviving as a low pile of rubble stones, much disturbed and containing the footings of a crude later structure, approximately 350m from the existing substation to be extended. It is recognised that 51 of the non-designated heritage assets are related to prehistoric activity with hut circles and cairns the predominant asset types. Of the remaining non-designated assets, 53 are dated to the post-medieval period, mostly comprising enclosures, field boundaries and farmsteads. Nine of the non-designated assets are undated.

3. PLANNING HISTORY

3.1	20 July 2015	12/04781/S36: Erection of 24 5mW wind turbines up to a maximum tip height of 139m (a mix of turbines with tip height of 139m and 126m are proposed for Limekiln Wind Farm	REFUSED BY SCOTTISH MINISTERS
3.2	24 February 2016	16/00066/SCOP: Proposed erection of 24 wind turbines and associated infrastructure at the Limekiln Estate.	SCOPING APPLICATION DECISION ISSUED
3.3	21 June 2019	16/02752/S36: Proposed erection of 24 wind turbines (9 Turbines at 126m to blade tip and 15 turbines at 139m to blade tip) and associated infrastructure at the Limekiln Estate with a generating capacity of up to 72MW	APPROVED BY SCOTTISH MINISTERS
3.4	28 May 2018	18/02196/SCRE: Installation of 132kV overhead line	SCREENING APPLICATION EIA REQUIRED
3.5	05 November 2018	18/04660/SCOP: Proposed section 37 application for Limekiln wind farm 132kv grid connection	SCOPING APPLICATION DECISION ISSUED
3.6	27 February 2020	20/00279/SCOP: Limekiln Wind Farm Extension - Erection of 7 wind turbines and associated infrastructure	SCOPING APPLICATION DECISION ISSUED
3.7	27 October 2020	20/01595/S37: Install and keep installed the proposed Limekiln Wind Farm 132 kV Grid Connection overhead electric line	APPROVED BY SCOTTISH MINISTERS
3.8	06 May 2022	20/01905/S36: Limekiln Extension Wind Farm - Erection and Operation of a Wind Farm for a period of 30 years, comprising of 5 Wind Turbines with a maximum blade tip height	APPROVED BY SCOTTISH MINISTERS

		149.9m, with access tracks, hardstanding areas, substation, battery storage facility, control building compound, borrow pits and cabling	
3.9	24 November 2023	20/01905/PSCON: Satisfaction of planning condition 13 - 20/01905/S36 - Limekiln Extension Wind Farm - Erection and Operation of a Wind Farm for a period of 30 years, comprising of 5 Wind Turbines with a maximum blade tip height 149.9m, with access tracks, hardstanding areas, substation, battery storage facility, control building compound, borrow pits and cabling	CASE CLOSED
3.10	21 December 2023	20/01905/PSCON/1: Satisfaction of planning conditions 10, 21, 23, 24, 28, 29, 31 and 32 - 20/01905/S36 - Limekiln Extension Wind Farm	CASE CLOSED
3.11	21 December 2023	20/01905/PSCON/2: Satisfaction of planning conditions 8, 11, 15, 17, 18, 25, 26, 27 and 30 - 20/01905/S36 - Limekiln Extension Wind Farm	CASE CLOSED
3.12	17 May 2022	21/03750/S36: Limekiln Wind Farm - Application under Section 36 of the Electricity Act 1989 to vary the consented Limekiln Wind Farm to increase the blade tip height from 15 turbines at a mximum blade tip of 130m and 6 turbines with a maximum blade tip height of 126m to 21 turbines with a maximum blade tip height of 149.9m	APPROVED BY SCOTTISH MINISTERS
3.13	24 November 2023	21/03750/PSCON/2: Satisfaction of planning conditions 8, 11, 15, 17, 18, 21.1, 23.1, 26, 27, 28, 31, 34 - 21/03750/S36 - Limekiln Wind Farm	CASE CLOSED
3.14	23 April 2021	21/01373/SCOP: Limekiln Wind Farm - Amendments to Section 36C application: increase to the blade tip height to make all turbines a maximum blade tip height of 149.9m;	SCOPING APPLICATION DECSION ISSUED
3.15	28 April 2021	21/01584/PNO: Upgrade of forest road	PRIOR APPROVAL NOT REQUIRED
3.16	26 October 2021	21/04712/PNO: Upgrade of forestry private way	PRIOR APPROVAL NOT REQUIRED

3.17	09 May 2022	22/00972/SCOP: West of Orkney Wind Farm - EIA Scoping Request for Onshore infrastructure associated with the Onshore Wind Farm, including cable landfall, substation, cable route, tracks and associated infrastructure	SCOPING APPLICATION DECISION ISSUED
3.18	31 May 2022	22/00990/S37: Proposed Offline Rebuild of 33kv Overhead Line at Dounreay, Caithness	S37 RAISE NO OBJECTION
3.19	09 June 2022	22/01589/SCOP: West of Orkney Wind Farm - Erection and Operation of an Offshore Wind Farm comprising up to 125 wind turbines with a maximum blade tip height of 370m, up to 5 offshore substation platforms, up to 750km of inter -array cables, up to 10 export cables including up to 5 cables making landfall in Caithness and ancillary infrastructure	SCOPING APPLICATION DECISION ISSUED
3.20	15 November 2023	23/05043/PNO: Peatland restoration works on Sandside Estate	PRIOR APPROVAL NOT REQUIRED
3.21	02 October 2024	24/02435/SCRE: Laying of underground cabling to link Bettyhill Wind Farm Phase 2 and Dounreay substation	CASE CLOSED
3.22	11 June 2024	24/01312/PAN: Laying of underground cabling to link Bettyhill Wind Farm Phase 2 and Dounreay substation	CASE CLOSED
3.23	31 October 2024	24/03000/SCRE: New twenty four span 33kV overhead line spur to supply Limekilns Switching Station. Overhead line will be made up of 21 wooden single poles and 2 wooden 'H' poles. Associated stay wires to be installed. The new overhead line is required to supply Limekilns Windfarm substation, Limekilns Windfarm is an EIA development	CASE CLOSED
3.24	19 September 2024	24/03504/S37: For a new 33kV twenty four span spur to supply the new Limekilns Wind Farm Switching Station at Reay	S37 RAISE NO OBJECTION
3.25	29 October 2024	24/03761/PAN: Laying of underground cabling to link Bettyhill Wind Farm Phase 2 and Dounreay substation	CASE CLOSED
3.26	29 May 2025	25/01662/SCRE: Limekiln Battery Energy Storage System (BESS) - Construction and operation of a proposed Battery Energy Storage	SCREENING APPLICATION

		System (BESS) (over 50 MW) and associated substation with associated infrastructure, access and ancillary works, on Limekiln Wind Farm	EIA NOT REQUIRED
3.27	09 October 2025	25/01309/PAN: Limekiln BESS - Construction and operation of a proposed Battery Energy Storage System (BESS) facility with capacity exceeding 50MW, associated infrastructure, access and ancillary works at Limekiln Wind Farm.	CASE CLOSED
3.28	21 October 2025	25/03631/S37: New 33kV EHV overhead line spur comprising a single span of 22 metre length supported by wooden poles of 10 metre height between NGR NC97596268	S37 Raise No Objection

4. PUBLIC PARTICIPATION

4.1 Advertised: Section 36 Application

Date Advertised:

- 1st and 8th August 2025 – The John O'Groats Journal
- 1st August 2025 – The Herald and The Edinburgh Gazette

Representation deadline: 10th September 2025

4.2 Representations received by the Highland Council: 0

4.3 Representations received by the Energy Consents Unit: 0

4.4 All letters of representation received by the Council are available for inspection via the Council's eplanning portal which can be accessed through the internet www.wam.highland.gov.uk/wam . Those representations received by the Scottish Government's Energy Consents Unit can be accessed via www.energyconsents.scot It should be noted that some representations have been submitted to both The Highland Council and Energy Consents Unit.

5. CONSULTATIONS

Consultations undertaken by the Highland Council:

5.1 **Caithness West Community Council (Host):** No response received.

5.2 **Halkirk and District Community Council:** No response received.

5.3 **Melvich Community Council:** No response received.

5.4 **Access Officer:** Does not object subject to condition. Advised that there is a core path within the site boundary, which should be accessible to the public throughout the construction period, as it was for the construction of the wind farm. Advised, that the applicants consulted with the councils Access Officer about temporary disruption to the core path to allow the new export cable from this proposed BESS to the existing sub-station which runs parallel to the core path. The initial suggestion was to use a diversion around the reinstated borrow pit, however, advised that the diversion is too long from the 620m of the core path to be worked upon. However, option 1 is considered by Access as much less significant and may be reasonable to use to allow the installation of the underground cable alongside the core path in a quick a time as possible (shortened by having complete control/no public on the core path during this stage). As such, the Access Officer states that a recreational access management should be provided for approval by the planning authority prior to the start of the works.

5.5 **Community Wealth Building:** Does not object. The Community Wealth Building team have logged the proposal and will be in touch with the Developer/Applicant regarding the Highland Social Value Charter.

5.6 **Development Plans:** Does not object to the application. Advises on the policy context and conformity with the Development Plan, as well as on community benefits and community wealth building.

5.7 **Ecology:** Does not object subject to condition.

The Ecology Team initially raised concerns to the proposals regarding a lack of information on biodiversity enhancement measures, however, following further submissions and clarification from the applicant, the Ecology team are now content with the proposals. Advised that the proposal does comply with NPF4 policy 3.

5.8 **Environmental Health:** Does not object subject to condition.

5.9 **Flood Risk Management Team:** Does not object subject to condition. Advised that the SEPA's online strategic flood mapping shows that the site lies outwith any areas of fluvial or coastal flooding during a 200 year + climate change storm event. This suggests that the flood risk from these sources may be low. FRM also advised that SEPA's online strategic flood mapping, surface water and small watercourse layer shows small areas of pluvial flooding within or near the extension site and the BESS site. Given the landform and development type, the FRM Team has no objection to this being managed by an appropriate drainage system. Various parts of the access route may be subject to pluvial flooding or small watercourse flooding, however the FRM Team has no comment to make on this occasion. FRM raised no objection to the proposals on the grounds of flood risk.

Advised that that application proposes surface-based attenuation SUDS systems for the two compounds, with part of the existing drainage system for the substation replaced by the new extension, and a swale constructed to attenuate surface water for the combined site. The BESS site would utilise a new SUDS basin. FRM advised that draft design calculations show that storage would cater for storm water at appropriate return periods/ discharge rates and shows that exceeded water would be appropriately managed. FRM raised no objection to the proposals, subject to the

use of a suitably worded planning condition to ensure the draft proposals are updated to proposals finalised for construction and submitted to the FRM Team for review and acceptance.

5.10 **Forestry:** Does not object subject to condition.

Provided two responses, initially stating that Chapter 4: Forestry, appears to detail some discrepancy, and requested further details.

Within the second response, Forestry advised that the applicant has committed to providing Compensatory Planting of equivalent woodland area (1.88ha) with at least the equivalent woodland-related net public benefits. No detail has been provided on a suitable site, but given the relatively small area involved, this can be secured by condition.

5.11 **Historic Environment Team – Archaeology:** Does not object. Advised that the application details the appropriate information with chapter 8, and concludes that impacts to designated and undesignated assets are minimal. As the layout is limited to land that has already been disturbed by previous development, the Archaeology Officer advised that the potential for buried remains to survive is low. As such, it is advised that it is not considered justified that mitigation such as a watching brief is required, and no mitigation in regard to the historic environment is therefore proposed here.

5.12 **Historic Environment Team – Conservation:** Does not object. Advised that following a review of Chapter 8, there are no designated listed buildings or scheduled monuments that would be directly impacted by the proposed development; therefore the Historic Environment Team (Conservation) have no comments for this application.

5.13 **Transport Planning:** Does not object subject to conditions.

Advised that the access to the site is from the A9 Trunk Road, A836, and U4724 roads. The e U4724 Milton Road was previously widened with unbound material in the verge to take construction traffic and wide loads. New access tracks were constructed off the U4724 and these are used for the maintenance of the existing development, all associated to the existing Limekiln Wind Farm and Limekiln Wind Farm Extension.

Advised that the application proposes a Wear and Tear Agreement, whereby the condition of the roads will be recorded prior to works commencing, at periods of 3 months during construction, and at the end of construction. Also, stated that along the A838 and U4724 routes, a number of structures will need to be assessed prior to commencement of the development, such as bridges, culverts and embankments, not assessed as of yet.

Consultations undertaken by the Scottish Government's Energy Consents Unit:

5.14 **BT:** Does not object. Advised that the project indicated should not cause interference to BT's current and presently planned radio network.

5.15 **Defence Infrastructure Organisation:** Does not object.

5.16 **Health and Safety Executive:** Does not object. Advised that the development area is not within any HSE licensed explosive safeguarding zones and is not within any HSE consultation zones.

HSE also has an interest in proposed developments that would have hazardous substances present at or above threshold quantities see the Town and Country Planning (Hazardous Substances) (Scotland) Regulations 2015. Stated that the Battery Storage energy system at Limekiln is not of this type, and therefore, HSE's Land Use Planning team has no further comments.

5.17 **HIAL:** Does not object.

5.18 **Historic Environment Scotland:** Does not object.

Provided two consultation responses, initially objected to the application due to insufficient information for an assessment of impacts on the setting of Clach Clais And Tuire, standing stone 100m SE of Loancorribest (SM441). HES initial assessments identified that the BESS would likely be visible from the monument, and were concerned about cumulative impact of modern development on the integrity of the setting of the standing stone.

Following further clarification on the supporting visualisations, HES were assured that the provided digital terrain data and bare earth zone of theoretical visibility (ZTV) demonstrates that due to intervening topography the proposals would not be visible from the standing stone.

HES advised that they're content to remove the initial objection to the proposal. Although HES stated that they remain concerned about the encroachment of modern development in the area around the monument, they're content that the impact of the proposals would not be of the magnitude that HES would object.

5.19 **MOD:** Does not object.

5.20 **NATS:** Does not object.

5.21 **NatureScot:** Does not object. Advised that there are natural heritage interests of international importance close to the site, but these will not be adversely affected by the proposal.

<u>Caithness and Sutherland Peatlands Special Area of Conservation (SAC)</u>

The proposal, at its closest, is located approximately 2.8km from this SAC which is protected for its peatland and freshwater habitats, marsh saxifrage and otter. NatureScot advised that there is no direct connection between the proposal or any of the SAC habitats and therefore consider that the proposal will not affect any of the habitat features. Otter associated with this SAC maybe present within Limekilns plantation and therefore further consideration and mitigation is required.

<u>Caithness and Sutherland Peatlands Special Protection Area (SPA)</u>

The proposal, at its closest, is located approximately 2.8km from this SAC which is protected for its peatland breeding waders, waterfowl and raptors. NatureScot advise that at this distance, they do not consider that there will be adverse impacts on breeding birds within the SPA, however are aware that some species within connectivity distance of this SPA, could potentially use open ground within the forest.

Nevertheless, NatureScot note the conclusions of the Boralex (July 2025) ornithology report, that “the likely effects of the Proposed Development on all bird species are likely to be negligible”.

Sandside Bay Site of Special Scientific Interest (SSSI)

The proposal, at its closest, is located approximately 3km from and is hydrologically connected to this SSSI which is protected for sand dunes, via the Achvarasdal Burn. NatureScot stated that there is the possibility for invasive non-native species to be spread from the development by the proposal. Therefore, advise that any Environmental Management and/or Pollution Plan should include measures/best practice to reduce the risk of INNS from being introduced/spread (e.g. directly via SUDS overflow, or indirectly through contaminated vehicles/materials from other construction sites).

Stated that it is unlikely that the proposal will have a significant effect on any qualifying interests either directly or indirectly for either of the designations. Advised that an appropriate assessment is therefore not required. NatureScot stated that this is because the construction of a BESS at this location is unlikely to disturb or displace breeding birds or adversely affect other protected species, subject to the standing advice linked to above. Also consider that the loss of 1.5 ha of potential bird foraging habitat to be of negligible significance, with other suitable locations available to forage nearby.

5.22 **Office for Nuclear Regulation:** Does not object. Stated that the proposed development does not present a significant external hazard to the safety of the nuclear site.

5.23 **RSPB:** Does not object. Confirmed RSPB will not be responding to the consultation.

5.24 **Scottish Fire and Rescue Service:** Does not object. Stated that SFRS are assessing all BESS site applications at the moment and there has been a working group established to consolidate all departments and provide unified responses to all applications. Until this group completes its work, advised that NFCC Best Practice guidance on BESS should be followed.

5.25 **SGN:** Does not object. Advised that SGN do not have any High-Pressure assets within the vicinity of the above consultation and as such would have no comment/objection.

5.26 **Scottish Water:** Does not object. Stated that there are no Scottish Water drinking water catchments or water abstraction sources, which are designated as Drinking Water Protected Areas under the Water Framework Directive, in the area that may be affected by the proposed activity.

5.27 **SEPA:** Does not object. No site-specific advice to provide, advised to refer to relevant SEPA standing advice.

5.28 **SSEN Transmission:** Does not object. Recommended that should approval be granted the ECU, to add an 'informative note' to the decision notice asking the developer to contact SSEN Transmission at Transmission.Asset.Management@sse.com at least 30 days prior to commencing development to ensure all safety measures are agreed with the developer to ensure

protection of the Limekiln 132kV substation and associated 132kV overhead transmission line throughout the construction period.

5.29 **Transport Scotland:** Does not object subject to conditions. Confirm that Transport Scotland are satisfied with the submitted TS/CTMP and have no objection to the development in terms of environmental impacts on the trunk road network.

6. DEVELOPMENT PLAN POLICY

6.1 Appendix 2 of this report provides details of the documents that comprise the adopted Development Plan, including details of pertinent planning policies as well as adopted supplementary guidance, and other material policy considerations which are relevant to the assessment of the application.

7. Planning Appraisal

7.1 This application has been submitted to the Scottish Government under Section 36 of the Electricity Act 1989 (as amended). Should Ministers approve the development, it will receive deemed planning permission under Section 57(2) of the Town and Country Planning (Scotland) Act 1997 (as amended). Although not a planning application, the Council processes S36 applications in a similar manner given that planning permission may be deemed to be granted.

7.2 Schedule 9 of The Electricity Act 1989 contains considerations in relation to the impact of proposals on amenity and fisheries. These considerations mean the developer is required to:

- have regard to the desirability of preserving natural beauty, of conserving flora, fauna and geological or physiographical features of special interest and of protecting sites, buildings, and objects of architectural, historic or archaeological interest; and
- reasonably mitigate any effect which the proposals would have on the natural beauty of the countryside or on any such flora, fauna, features, sites, buildings or objects.

7.3 It should be noted that for applications under the Electricity Act 1989 that the Development Plan is just one of a number of considerations, and therefore Section 25 of the Town and Country Planning (Scotland) Act 1997 which requires planning applications to be determined in accordance with the Development Plan, unless material considerations indicate otherwise, is not engaged. That said, the application is still required 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

7.4 The key considerations in this case are:

a) Compliance with the Development Plan and Other Planning Policy;

b) Energy and Carbon Saving;

c) Socio-Economic Impacts;

d) Siting, Design, Landscape and Visual Impacts;
e) Natural Heritage;
f) Habitats;
g) Soils;
h) Trees, Protected Species and Biodiversity;
i) Built and Cultural Heritage;
j) Amenity;
k) Flood Risk and Drainage;
l) Health and Safety;
m) Traffic and Transport;
n) Public Access;
o) Decommissioning and Reinstatement; and,
p) Any Other Material Considerations

Development plan/other planning policy

7.5 The Development Plan comprises National Planning Framework 4 (NPF4), the adopted Highland-wide Local Development Plan (HwLDP), the Caithness and Sutherland Local Development Plan (CaSPlan), and all statutorily adopted supplementary guidance.

7.6 Appendix 3 of this report provides an assessment of compliance with the Development Plan / Other Planning Policy.

7.7 In summary, the Development Plan, which includes NPF4, must be considered in the round. While there is clear in principle support for renewable energy proposals that contribute to reaching net zero, of which BESS technology is one, this is not unqualified. It needs to be demonstrated that the impact on factors such as community amenity, biodiversity, landscape and visual matters, heritage, and infrastructure, to name but a few, are addressed and/or adequately and appropriately mitigated and as such, several policy considerations will apply. The extent to which the proposal's energy, economic and other benefits outweigh, or otherwise, other policy considerations are assessed in the following sections, which set out that the proposal is generally in conformity with the provisions of the development plan.

Energy and Carbon Saving

7.8 The proposal would be interconnected to the grid's transmission / distribution network and not co-located with an electrical generating station. The development will, however, collect energy from the grid when the supply outstrips demand. Such facilities make a commercial return by buying electricity from the grid when rates are cheaper and selling it back to the grid when rates are more expensive. However, the proposal will also provide electricity or other grid services when needed. Depending on the mix of electricity at the time of collection, the BESS facility may or may not be storing and then releasing renewable energy. That said all electricity generation in

the region comes from renewable sources and therefore this the proposal is considered to 'regenerate' renewable energy.

7.9 The benefit of BESS is that it stores excess energy being generated by renewable generating stations such as wind farms when the grid has reached full capacity, much of which would otherwise be lost. BESS, therefore, allows renewable generating stations to operate for longer periods and provides flexibility to the grid to respond to peaks and troughs in energy demand. As a result, the technology is considered to support government policy that seeks to end a reliance on backup electricity generation from fossil fuel reliant generators and allow the full benefits of renewables, which is where the development's intrinsic carbon saving benefits are to be realised.

Socio-Economic Impacts

7.10 Energy storage facilities are an emergent technology and are expected to be a significant component of national energy infrastructure in the coming years and are therefore expected to support jobs and economic development. The Council is in the process of working with public, private, and community partners to develop its priorities through the Highland Outcome Improvement Plan, while the production of a Community Wealth Building Strategy is also currently under way. The ongoing Local Place Plans initiative will likely identify other local opportunities too. The Council's position on Community Benefits has recently been updated with the approval of a new 'Social Values Charter for Renewables Investment' (June 2024). The charter sets out the Council's expectations from developers wishing to invest in renewables related projects in the Highland area and what the Highland partnership will do to support and enable this contribution, namely:

- embed an approach to community wealth building into Highland;
- maximise economic benefits from our natural environment and resources;
- engage and involve relevant stakeholders to understand how we can continually improve our impact; and,
- unlock economic opportunities for the area.

7.11 The submission includes a Socio-Economic Impact Assessment associated with the proposals which addresses community benefit. Given that no specific legislation or guidance is available on the methods which should be used when assessing the socio-economic effects of a proposed battery energy storage system developments, methods similar to that used in Environmental Impact Assessments for other proposed renewable energy technology developments has been utilised. As such, during development and construction, the economic benefits expected are:

- £3.2 million Gross Value Added (GVA) and 40 years of employment in Highland; and
- £8.4 million GVA and 100 years of employment in Scotland.

With the expenditure for the operation and maintenance of the proposal could deliver up to:

- £0.3 million GVA and 3 jobs in Highland; and
- £0.5 million GVA and 4 jobs in Scotland.

The proposed development will also support the delivery of local services through the annual payment of £0.1 million in non-domestic rates.

7.12 The applicant states that whilst community benefit funding is not a standard practice for energy storage developments, the proposal will provide £8,400 per year index-linked in funds to support community-led initiatives over its operational lifetime. In addition, with the five key objectives of the councils Community Wealthy Building Strategy, the application identifies compliance to contribute through local spending, a BESS fund, local employment, fair wages, using the land for productive use, and stakeholder engagement. In consultation with the councils Development Plans Team, it has also been confirmed that the applicant has committed to working with the National Schools Partnership to design a school-based education programme surrounding the proposed development. If consent were to be granted the applicant has also committed to maximising local supply chains opportunities.

7.13 Community Benefit is not considered a material planning consideration, and therefore the Planning Authority does not have the ability to compel developers to sign up to the provisions of the Charter. As such, community benefit can only be secured by means of a voluntary arrangement between the Council and the Developer, and the Council's Community Wealth Building Team are aware of the proposal and will conduct their own discussions with the developer directly. A condition should be attached to secure details of a local employment scheme, to ensure compliance with NPF4 Policy 11c) and to maximise the local socio-economic benefits of the development to the wider community.

Siting, Design, Landscape & Visual Impacts

7.14 The location of the proposed BESS is generally flat ground which is mapped as class 6.3 – *land capable of use as rough grazing's with low quality plants*. The proposed substation extension is also located on ground classed as 6.3, as well as ground classed as 5.3 - *Land capable of use as improved grassland*. Pasture deteriorates quickly, as per the Scotland's National scale land capability for agriculture map. As such, the site is not considered to be Prime Agricultural land in accordance with Policy 5b of the NPF4.

7.15 As already mentioned, BESS developments play a key role in ensuring full benefits of renewable energy generation are sought, with the transition to net-zero. Batteries import quantities of renewable energy when supply is typically at its highest, such as from wind farms, and in excess of demand, storing it, and then exporting it back into the grid when demand is high, but supply is low. As such, the location of the proposed BESS infrastructure has been selected by its proximity to the existing Limekiln Wind Farm grid connection.

7.16 The applicant is seeking to optimise the use of the existing grid connection infrastructure associated with Limekiln Wind Farm to support greater grid efficiency and flexibility. By locating the Proposed Development near the existing wind farm substation, the design maximises electrical efficiency and minimises the length of cabling required, thereby reducing potential environmental impacts. The site would connect to on-site Limekiln Wind Farm Substation which would be extended, thereafter connects to the transmission network at Dounreay Substation. The BESS project is designed to utilise the spare capacity on the existing overhead line to

Limekiln Wind Farm, thus no infrastructure works are required from SSEN to connect the BESS project, and the cable corridor to Dounreay is therefore not assessed as part of the application.

7.17 The proposed BESS compound will be located on the reinstated temporary construction compound used previously for the Limekiln Wind Farm development, and will measure a footprint of 115m by 80m, formed of crushed rock laid on permeable membranes. Although indicative at this stage, the BESS compound is likely to contain up to 90 energy storage units, arranged in sets of two. Each unit would be approximately 6m x 2.5m x 3m high, comprising steel containers which are designed to be secure, in a finished colour light grey or green. The compound will also include approximately 18 combined inverter and transformer units (6.1m x 2.4m x 2.9m), with one switchgear and control building (21.5m x 6m x 4m) also sited with the BESS units. The BESS compound would be enclosed by 3 m high steel palisade fence, which would also be installed around the outer perimeter, with CCTV cameras installed on 4m high columns (the tallest feature of the compound). Lighting proposals within the main compound would solely consist of motion-sensitive lighting at the entrances, which would only be activated during occasional visits by maintenance personnel, with invisible infra-red lighting present and only detectable by security cameras. the associated infrastructure and battery storage container units, and all associated finishes, including the proposed fencing, can be agreed with the applicant prior to installation. The finalised colour, finish and materials proposed can be secured by condition.

7.18 The proposed Substation Extension would sit immediately adjacent to the operational Limekiln Wind Farm Substation, wrapping around its northern edge, with a footprint of 0.3ha, on a hardstanding formed of crushed aggregate laid on permeable membranes. The tallest elements in the Substation Extension would be 7.5m, which is consistent with the operational Substation infrastructure. The Substation Extension would be connected to the BESS facility by way of an 800m underground cable running alongside the existing Core Path. An outdoor switchgear and 132/33 kV transformer will also be required at the Substation Extension to aid the connection of the BESS to the grid. The substation extension would also be enclosed by 3m high palisade fencing with appropriate security cameras also installed.

7.19 As part of the proposals a temporary construction compound area will be required. The compound would be used to store materials, provide vehicle parking, and would form a location for site cabins, offices and welfare facilities, anticipated for a 36-week duration of the groundwork and installation phases however this area will be cleared during the commissioning stage. The construction compound will be found within the identified Augmentation Area located immediately to the west of the BESS facility, measuring a footprint of 80m x 50m. Given battery storage and output capacity diminishes over time, many methods are utilised to maintain the overall output. These methods are progressive replacement of battery cells within units, replacement of whole units within the main facility or installing additional battery units within or next to the main facility. The augmentation area would provide a location to account for any future degradation allowing the BESS to maintain the efficiency over time and maintain the 70 MW capacity as much as possible. Should any future battery development be proposed in the location of the augmentation area which

would increase the generating capacity of the site, this would require consent and be subject to a further application.

7.20 The submitted LVIA entails the provision of a Zone of Theoretical Visibility (ZTV). The bare earth ZTV illustrates the potential visibility of the development without any effects of screening other than from landform profile, omitting the effects from obstacles such as buildings, and vegetation. The LVIA states that given the proposals are located within and surrounded by a commercial forestry plantation, Figure 5.2 (Baseline ZTV) overstates the potential visibility of the proposals, due to the lack of included screening which is significant in this case and as such, can be accepted. In comparison, Figure 5.3, a Screened ZTV has been provided which includes a nominal height of 10m given to existing trees and forestry to gain an idea of the amount of potential screening surrounding the proposals. The data of existing forestry used in the ZTV assessments within Limekiln Forest, also reflects the programme of felling that has recently taken place, and it also assumes that all trees projected for felling up until 2027 (Phases 1 and 2) will be removed. On review of Figure 5.3, the site surrounding, landform nature and existing forestry cover, has a significant impact on the screening of the proposals, limiting views of the development proposed. At close range (within 1-2 km), the LVIA concludes that visibility is substantially contained by the Limekiln Forest, except for close range views from the Core Path which passes by the existing substation and proposed BESS site which is also agreed by the Planning Authority. Beyond this close distance, very limited extents of visibility of the proposals are present, limited to elevated ground to the west and a small patch of visibility on the Hills of Shebster to the east.

7.21 The LVIA states that despite the limited potential that residents or visitors in surrounding settlements will be affected by the proposals, selected viewpoints have been included south of Reay and towards Shebster to illustrate the constrained nature of visibility. On review of the ZTV further visualisations have been provided from viewpoints at Bein Ratha to the west, Borlum Hill to the North, as well as locations along the adjacent core path at both the existing substation and the proposed BESS site.

7.22 The two LCTs that may be considered relevant to the appraisal are the Sweeping Moorlands and Flows LCT which accommodates the proposals, and the Farmed Lowland Plain LCT, which lies to the immediate north of Limekiln Forest. Due to separation distance with the proposals, as well as the scale of the development proposed and the existing coniferous screening, no further LCTs were considered which is accepted. The site and immediate surrounding do not form any national or local landscape designations. The Farr Bay, Strathy and Portskerra Special Landscape Area (SLA) sit approximately 8km to the northwest, while the Dunnet Head SLA lies over 20km to the east. In addition, the East Halladale Flows Wild Land Area (WLA), is situated approximately 1.7 km to the west of the site. The LVIA states that no effects on the special landscape or defined wildness qualities of these designations will arise owing to a combination of the sufficient separation distances, small scale and low-lying nature of the proposals, extents of existing wind farm and ancillary infrastructure, as well as the landform and forestry screening afforded. As such, the SLA and WLA designations have been scoped out of the assessments which is accepted.

7.23 The Sweeping Moorland and Flows LCT covers an expansive area stretching from Strath More in the west, to the east coast at Wick, and from Strath Fleet in the south, to the north coast at Reay. Generally characterised by the broad expanse of open moorland, NatureScot's description also notes the variation in character across the vast area covered by the LCT, adding that coniferous forestry has a strong presence in some areas, particularly the more modified outer fringes, interrupting the continuity of the moorland cover. As such, the proposals are located within the Limekiln forestry plantation, characterised by the enclosure of forestry in contrast to the openness of the core flows and moorland, with the existing wind farm and the rotational felling and restocking, distinguishing a heavily managed and modified landscape in contrast to the naturalness of the flows, with the wind turbines adding large scale energy generation an established feature of the baseline character. In terms of impact on the proposals on this LCT, the LVIA values this LCT as medium to medium-high to which is agreed by officers. As already noted, the proposals would have a very limited visibility, due largely to containment forestry. Pockets of high to medium visibility would arise in the immediate surroundings of the BESS compound and Substation Extension, at close range during construction and operation, in the wider context of the existing Wind Farm and ongoing forestry management works. Outwith 2km, the ZTV indicates areas of low visibility across elevated ground to the southwest; west and northwest, affecting sweeping open moorland parts of the LCT as well as higher levels of visibility arising across a small area on the western side of Hill of Shebster. The LVIA considered that this visibility will be experienced in the context of the surrounding wind farm and other human influences in the adjoining LCT 143. In addition to the low scale nature of the proposals, the magnitude of change on the defining characteristics of the LCT is medium to low during construction (and decommissioning) and low during operation of the proposals, with the level of effect on the LCT, Moderate/Minor during construction reducing to Minor in operation. Officers agree with this assessment on the basis that the effects would occur where visibility arises within 2km surrounding the proposals. In regard to any cumulative effect on this LCT, wherever visible, the proposals will likely be experienced in the context of the surrounding wind farm and existing substation infrastructure. When experienced at close range, the proposals will marginally increase the cumulative influence of energy related infrastructure within the LCT. However, given its limited visibility and that the operational wind farm already has a defining influence on the character of the LCT, the cumulative effect of the proposals is anticipated to be minor.

7.24 The Farmed Lowland Plain LCT is situated to the immediate north of Limekiln, extending to the coastline. Given the ample screening of the proposals from the surrounding forestry and intervening landform, as well as the small scale of the proposals which are relatively small in height, there is not considered to be any material impacts on this LCT. Officers agree with the LVIA, adding that given the limited visibility beyond 2km of the proposals, and the lack of new infrastructure proposed in this LCT, there is not anticipated to be a material effect on the character of the LCT.

7.25 In terms of mitigation against any adverse effect on landscape, the application states that ground disturbance is minimised by the chosen BESS location, given it was the previous wind farm construction compound, in addition to the use of existing access tracks. The application also notes that any excavated soil materials would be

retained and reused on areas to be revegetated following construction which is welcomed. The site selection and ample screening afforded by locating the BESS and Substation Extension within existing areas of a coniferous plantation, on brownfield sites, with the low- lying nature of the proposals complying with existing ground levels and infrastructure, the proposals have been appropriately mitigated to avoid any adverse effect on surrounding landscapes.

7.26 Visibility of the proposals will be limited to close range views, as clearly distinguished by viewpoints 1 and 2, taken at the Substation extension and Bess compound location of the Limekiln Forest core path. The core path is a circular route throughout the forest, which connects to other core paths extending to the Reay village. It is worth noting that this route, whilst influenced by the surrounding forestry, given the installation of 19 wind turbines, existing substation and associated infrastructure, the Limekiln Forest has developed a more open character whilst planting re-establishes. Officers agree with the LVIA that medium-high sensitivity is recognised at both viewpoint 1 and 2. On assessment of viewpoint 1, the substation extension would appear in the view of the existing substation infrastructure, appearing larger due to its location within the viewpoint. The extension would be contained within forestry and to the rear of the existing substation infrastructure, containing and allowing the proposal to blend into its immediate surroundings. As such, whilst the extension adds a new addition to views on an approximate stretch of 200m of the core path, there is no visibility of the BESS compound. Officers agree that the magnitude of change is high during construction (and decommissioning) and medium-high during operation, however this is limited to the immediate surroundings from this viewpoint. The level of effect on the visual amenity and view at Viewpoint 1, Core Path would be Major during Construction and Major/ Moderate during operation, given its proximity to the substation extension, whilst being contained within forestry and existing infrastructure.

7.27 Viewpoint 2, further to the east of Viewpoint 1, is situated to the south of the BESS proposals, where the core path enters a newly cleared area of forest, overlooking the restored former construction compound. The BESS compound, modelled at a maximum height of 4m, is seen in views immediately to the north of the core path, set against a backdrop of retained forestry. Wind turbines are located outwith the visualisation to the south and east of this location, with the proposals having a similar containment and integration effect to the substation extension, given surrounding forestry and energy generation infrastructure. Whilst a noticeable new addition in from views at this location, potentially affecting 400m of the core path, officers agree the magnitude of change is high during construction (and decommissioning) and medium-high during operation, however again this would be limited to the immediate surroundings experienced at this location. The level of effect on the visual amenity and view at Viewpoint 2, Core Path would be Major during Construction and Major/ Moderate during operation, given its proximity to the BESS compound, whilst contained within forestry and existing infrastructure. At this location view of the substation and extension would be fully screened. The cumulative effects at both viewpoint 1 and 2, are deemed be of a medium to low order of magnitude and the overall cumulative effect is likely to be moderate. At both locations, the proximity of the proposals whilst there would be an increase of energy related infrastructure, the existing forestry would largely contain any cumulative effects.

7.28 To the west of the proposal's views are limited primarily to areas of elevated ground. Viewpoint 3 is taken from the summit of Beinn Ratha, at an elevation of 242m AOD. This view is characterised by the existing wind farm and the forestry plantation, which extends across the low hills of the moorland with patches of felling and replating works. Areas of contrast can also be seen from the panoramic view with the coastal edge, greenery of agricultural land use, scatterings of small-scale development, with the Dounreay Nuclear Power Plant also visible marking the industrial use along the coastline. Larger scale wind farm developments at Baillie Hill and Forss can also be seen, at 7.94km and 10.53km respectively. Whilst the sensitivity of the view is recognised as medium-high, given its location within the East Halladale WLA, there is an ample array of varying land use types. The proposals from viewpoint 3 would be viewed in context with the closeby Limkiln Wind Farm as well as those in the distance at Baillie and Forss. Setback against and contained within existing forestry, both the proposed extension and BESS compound are deemed to be very small in nature in the panoramic view, with considerable alternative developments close by and in the distance attracting the eye of the viewer. As such, the LVIA concludes the magnitude of change at viewpoint 3 to be low, and the level of effect on visual amenity and view to be moderate/minor, during both construction (and decommissioning) and during operation, which is agreed. Given the limited noticeability of the proposals in the context of existing developments from this view, particularly the Limekiln Wind Farm and its infrastructure, the cumulative effect is of a low order of magnitude and overall likely to be moderate/ minor.

7.29 Viewpoint 4, taken to the north of the proposals, at a height of approximately 80m AOD, the view south is characterised by the expansive coniferous plantation which covers much of the immediate landscape, together with the operational Limekiln Wind Farm. To the north, the view extends out across the coastal edge, a concentration of properties in the settlement of Reay and dispersed throughout the wider rural landscape. Large scale development is visible in the form of Dounreay Nuclear Power Plant, adjacent to the coast, and Baillie Hill wind farm, partially concealed by Shebster Hill to the east. Baillie Hill Wind Farm is seen as 21 turbines set at a range of 4.79km. On review, Limekiln Wind Farm presents the defining feature of the view, with coniferous plantation also visible. The wider view shows the extents of a settled landscape influenced by existing developments, resulting in an overall sensitivity rating of Medium at this location. The proposals would be viewed in the same snapshot as the operational Limekiln Wind Farm, sited within the forest plantation. As such, with only the uppermost parts of the proposals visible at this location, which will still be difficult to be noticed by the viewer, the magnitude of change is low during both construction (and decommissioning) and during operation, with the level of effect on the visual amenity and view at Viewpoint 4, deemed to be minor. Cumulatively, given the limited ability to notice the proposals from this location, contained within the wider forestry plantation and in the context of the existing wind farm, the cumulative effect is of a low order of magnitude, and the overall cumulative effect is likely to be minor.

7.30 Viewpoint 5 from Reay footpath forms part of the Core Path circuit known as Achins and Borlum Circuit (CA11.09), selected to represent the view which could potentially be experienced by residents of Reay along the southern boundary of the settlement or from streets which afford open views towards the south. As confirmed by the ZTV, views from the southern edge of Reay will be partially obscured by close range

landform and forestry, allowing for more open view this viewpoint has been selected by the applicant. The focus of the view is the northern edge of Limekiln Forest which contains Limekiln Wind Farm, seen beyond the band of coniferous woodland to the south of the viewpoint. The footpath, wall, fencing, electricity transmission line, forestry and agricultural land, all evidence human influences in this landscape from this viewpoint. Considering the existing view elements, lack of designation and importance of the visual amenity of the Reay village, results in an overall sensitivity rating of medium to high. As shown from the visualisation in this location, the proposals would be screened behind the existing forestry. If the forestry were to be removed, the level of visibility would increase, however, the Limekiln Forest Management Plan indicates the long-term retention of the northern edge of the plantation and as such the level of screening is likely to be retained. Whilst the ZTV recognises that visibility will increase the further west along the path, any visibility will still be low and extremely limited, contained within the nature of the forestry and existing wind farm view. On the precaution, given some construction may appear visible, the magnitude of change is low during construction (and decommissioning) and negligible during operation, with the level of effect on the visual amenity and view Moderate/Minor during construction and Minor during operation, all of which is accepted. Given the inability to view the proposals, particularly during operation, the cumulative effect is deemed negligible from this viewpoint.

7.31 The final viewpoint is taken from Shebster, representing the view of residents occupying properties as well as the visual amenity of road users travelling along the minor road between the B874 at Glengolly and the A836 at Isauld, which also forms part of the National Cycle Route. From this location, existing developments appear small in scale, with the Limekiln Wind Farm provides a human influence on the skyline to the southwest. In the opposite direction, large scale development is visible in the form of Baillie Hill wind farm. Typically, the view shows a mix of farmland and forestry and lacks any special landscape features. Given the mix of receptors, lack of designation and distinction, the view is given an overall sensitivity rating of Medium-High. As per the visuals, the proposals would again be screened within the forestry plantation, with no visibility from the chosen location. Whilst the level of screening may reduce, given felling and restocking practice, the BESS compound and Substation Extension are likely to shielded by the depth and layering of forestry between the Proposed Development and Shebster, which includes forestry outside the Limekiln Forest. It is also considered reasonable to presume some forestry screening will remain intact. Given the separation distance and available screening, low lying nature of the proposals, the level of effect is Minor during construction (and decommissioning) and during operation, with a negligible cumulative effect established given the proposals will not be experienced in the context of the Limekiln Wind Farm, or other energy related development in the view.

7.32 Overall, Landscape and Visual effects of the proposals can be deemed to be severely localised, within the application site, where the BESS compound and Substation Extension can be experienced at close range from the Core Path. Where visibility is experienced, it will be most likely be viewed in the context of the existing wind farm and ancillary infrastructure and contained within the forestry plantation. It is considered that the landscape and visual effects of the proposals would not be of the significance to warrant the raising of an objection to the application.

Natural Heritage

7.33 The site is not within any designated sites for ecological interests, with the closest designation the Sandside Bay Site of Special Scientific Interest (SSSI) situated 35m north of the access track, approximately 3km from the proposals and with a hydrological connection to this SSSI which is protected for sand dunes, via the Achvarasdal Burn. In consultation with NatureScot, there is the possibility for invasive non-native species (INNS) to be spread from the development. As such, it has been advised that any Environmental Management and/or Pollution Plan should include measures/best practice to reduce the risk of INNS from being introduced/spread (e.g. directly via SUDS overflow, or indirectly through contaminated vehicles/materials from other construction sites), which should be secured by condition. The Caithness and Sutherland Peatlands Special Area of Conservation (SAC), at its closest, is located approximately 2.8km from this designation, which is protected for its peatland and freshwater habitats, marsh saxifrage and otter. NatureScot have advised that there is no direct connection between the proposal or any of the SAC habitats and consider that the proposal will not affect any of the habitat features. Otter associated with the SAC maybe present within Limekilns plantation and therefore further consideration and mitigation is required, which will be covered by condition. The Caithness and Sutherland SPA is also situated 2.8km from the proposals which is protected for its peatland breeding waders, waterfowl and raptors. NatureScot do not consider that there will be adverse impacts on breeding birds within the SPA, whilst also recognise that some species within connectivity distance of this SPA, could potentially use open ground within the forest. Nevertheless, the Ornithology reports submitted in support of the proposals, conclude impacts on all bird species are likely to be negligible. The status of both the SPA and SAC means the requirements of the Conservation (Natural Habitats, &c.) Regulations 1994 as amended (the 'Habitats Regulations') apply or, for reserved matters, The Conservation of Habitats and Species Regulations 2017. Consequently, the ECU is required to consider the effect of the proposal on the SPA and SAC before it can be consented, with NatureScot advising against the requirement of an Appropriate Assessment. Predominantly this is due to the construction of the proposed BESS being unlikely to disturb or displace breeding birds or adversely affect other protected species. NatureScot also state that the loss of 1.5 ha of potential bird foraging habitat is of negligible significance, with other suitable locations available to forage nearby. Despite limited impact is perceived from the proposals on any nearby designated site, as secured by condition, standard construction practices are recommended to be controlled through a CEMP to further mitigate against any environmental impact.

Habitats

7.34 A Phase 1 habitat survey concluded that site and immediate surroundings consist of habitats in the form of coniferous plantation woodland, recently felled coniferous woodland, neutral grassland and wet heath, with wider habitats from the site mainly plantation woodland and similar shrub heath. The application states that the presence of areas of wet heath are considered likely to result from drying of bog habitats associated with forestry operations. Overall, existing habitat features of biodiversity value will largely be retained and protected throughout the construction and operation phases. The habitat loss is approximately a small amount of wet dwarf shrub heath (approx. 0.02 ha) which is heavily degraded, and discrete areas of

plantation woodland of low ecological value (totalling approx. 2.59 ha) as discussed within the Tree section below. As confirmed by the councils Ecology Team, no evidence of protected plants or any invasive non-native species within 2 km of the site and no evidence to suggest the integrity of any designated sites would be affected by the proposals.

Soils

7.35 In review of the Scotland's Soils Carbon and Peatland Map 2016, the proposed BESS compound and substation extension are located upon Class 1 - Nationally important carbon-rich soils, deep peat and priority peatland habitat, areas likely to be of high conservation value. The indicatively proposed underground cable route is also located partially within Class 2 - Nationally important carbon-rich soils, deep peat and priority peatland habitat, areas of potentially high conservation value and restoration potential. Wider areas within the application redline boundary also include Class 3 and Class 5 soils however these areas constitute the existing wind farm access tracks which will also provide vehicular access to the development proposed.

7.36 Nevertheless, the proposed BESS site is presently comprised of felled and unfelled forestry, and the proposed Substation extension area is presently comprised of felled forestry land to the north of the Limekiln Wind Farm Substation. On review of Chapter 9 Geology & Peat, a site walkover survey has concluded that the proposed BESS and proposed cable route lie within shallow mineral soils rather than peat and no Class 1 peatland is found within these areas. In addition, the proposed substation extension is found to be within an area of made ground comprising a mixture of bedrock, mineral soils and peat soils rather than Class 1 peatland. The examination of the Peat Landslide Hazard Risk Assessment (PLHRA) which accompanied the wind farm planning application confirmed a negligible risk of peat landslide, and as such, there is no anticipated effects on peatlands resource because of the proposals. No Peat Management Plan will be required in support of the proposal, however as part of a site-specific Construction Environmental Management Plan (CEMP) which shall be secured by condition, shall include measures to safeguard soils and geology which is accepted.

Trees, Protected Species and Biodiversity

7.37 To construct the proposals including the underground cable route there would be a requirement to fell and remove 2.59ha of productive conifer, Sitka spruce and Lodgepole pine in mixture. These areas required for felling are also identified for felling as part of Phase 3 of the Limekiln Long Term Forst Plan. As part of the Forest Plan, 0.71ha will be replanted with productive conifer species, however, 1.88ha of the felled area would require to be left unplanted and as open ground as a safety buffer around the proposals. As such, the remaining 1.88ha would be proposed for offsite compensatory planting, with at least the equivalent woodland-related net public benefits. The applicant should also be aware that the area of offsite compensatory planning shall be carried out with the highland region. In consultation with the councils Forestry Officer, whilst no detail has been provided detail has been provided on a suitable site for offsite compensatory planting, given the relatively small area involved, this is advised to be secured by condition which is accepted.

7.38 The proposed BESS is located on reinstated batching plant which was used previously during the construction of the Limekiln Wind Farm. This area has since been reinstated to comply with the planning conditions attached to the wind farm consent and was due to be replanted with trees. However, the Long-Term Forest Plan will now be further updated to reflect the requirements of this application and to designate areas as permanent woodland removal.

7.39 Desk based research returned two records of protected or notable species, pine marten (2021) and pygmy shrew (2019), both 1.62 km west of the site. Documentation which supported the operational Limekiln Wind Farm revealed the presence of pine marten, water vole and common lizard in the wider renewable energy site. No evidence of protected species was found on site during field surveys, as habitats provide very little potential. No potential bat roosts were identified, but it is acknowledged that on-site habitat may be suitable for various reptile species. Records of Common Lizard, Pine Marten, Water Vole and Pygmy Shrew were returned within the last ten years from the wider wind farm development site. There is suitable habitat surrounding the site for Badger and Red Squirrel, but they are considered to be absent from the area as confirmed by Ecology. Whilst the application deems the site unsuitable for Otter, given NatureScot deem there to be potential for Otter in the wider Limekiln plantations in association with the Caithness and Sutherland Peatlands SAC, Otter will need to be included in any pre-construction surveys carried out. The application also advises that Pre-construction surveys will be required for badger, pine marten and roosting bats. The councils Ecology Team have advised that reptiles shall also be included in such surveys, and as such, the pre-construction surveys should be secured by condition.

7.40 About Ornithology, breeding bird surveys conducted in April – May 2025 confirmed territories of fourteen species of passerine within 500m of the site, including small numbers of Schedule 1 Common Crossbill and Red-listed Lesser Redpoll. As confirmed by Ecology, the development is not considered to have any negative effects on any bird populations. Embedded protection measures within the application state that vegetation clearance should take place between September and March to avoid the bird breeding season. Ecology have advised that given Crossbill species can begin breeding in midwinter, pre-construction checks for breeding Crossbills should be undertaken if any works are to be carried out from December to March.

7.41 Ecology have confirmed that the latest proposals satisfy the requirements of NPF4 Policy 3 and show that planned habitat management measures give a 10.16% increase to baseline habitat units. To benefit protected and notable species which may be present on site, the biodiversity enhancement measures proposed within the application include the installation of bat and bird boxes, including barn owl boxes, refugia piles for amphibians and reptiles, and hedgerow planting of fruit bearing native species to provide a foraging resource for several species. In addition, restoration of the remaining area surrounding the proposed substation extension to manage heathland and associated habitats will be carried out, with heathland also allowed to expand into cable route areas. The restoration and enhancement of plantation woodland edge habitats following felling and allowing heathland to expand into open areas around the BESS, are also proposed as enhancement proposals. In consultation with the councils Ecology Team, earlier concerns have largely been

addressed, including the selection of hardy species for native hedgerow planting, active management of upland heathland and appropriate siting of bird and bat boxes. As the site is found within the restricted range of the Great Yellow Bumblebee, a UK BAP species, Ecology have suggested further enhancement by adding suitable forage flowering plants to the neutral grassland areas, such as Bird's Foot Trefoil, Red Clover, Kidney and other Vetch species, Knapweed, Comfrey and Field Scabious, which the applicant is advised to consider. A Habitat Management Plan should be secured by condition and should include details of ongoing monitoring along with maps of habitat enhancement and bird and bat box locations.

Built and Cultural Heritage

7.42 As already mentioned, the site is not situated within any built heritage designation and there are no scheduled monuments or listed buildings within the boundary of the proposed development. Within the wider 2km surrounding the site, there us 3 designated heritage assets. These comprise Clach Clais an Tuire standing stone (SM441), Achvarasdal House Standing Stones (SM421) and Achvarasdal House Broch (SM514). In addition, 113 non-designated heritage assets are found within the wider 2km, with none in the application boundary.

7.43 As the layout is limited to land that has already been disturbed by previous development, the councils Archaeology Officer advised that the potential for buried remains to survive is low. Therefore, it is not considered justified that mitigation such as a watching brief is required. The provided assessments conclude that the significance of the three scheduled monuments with 2km would not be affected because of visual changes within their setting resulting from the proposed development of the BESS and associated Substation. In consultation with Historic Environmnet Scotland, whilst an initial objection was raised due to insufficient information for an assessment of impacts on the setting of Clach Clais and Tuire (SM441) with concerns about the proposal's visibility and cumulative impact on the heritage asset. Further details from the applicant ensured HES were content that the provided digital terrain data and bare earth zone of theoretical visibility (ZTV) demonstrates that due to intervening topography the proposals would not be visible from the standing stone. Whilst the objections to the proposals were withdrawn HES did reiterate concerns about the encroachment of modern development around the monument, however, these impacts are not of the magnitude for HES to object. It can be concluded that the understanding, appreciation and experience of the scheduled monuments that contributes to its cultural significance would be adequately retained.

7.44 In terms of the closest non-designated feature, MHG738 Borag Knowe cairn, approximately 350m from the existing substation, whilst there may be potential for an adverse effect on its setting, the construction of the extension would not add a significant change to the existing infrastructure (substation building) in this location at a level of which would warrant refusal. With the councils Historic Environment Tema and Historic Environment Scotland not objecting to the proposals, the application is considered acceptable in line with impact on cultural heritage assets.

Amenity

7.45 There are likely to be some adverse impacts caused by construction traffic and disruption, particularly during the anticipated construction phase when construction materials are being delivered to site and during works to connect the site to the forthcoming substation.

7.46 Developers and contractors must comply with reasonable operational practices regarding construction noise so as not to cause nuisance in any case, as required by Section 60 of the Control of Pollution Act 1974, which is regulated by Environmental Health. Working hours on the construction site would usually be restricted to be 07.00 – 19.00 Monday to Friday, 08.00 – 13.00 on Saturday with no Sunday or Bank Holiday working, all of which the application complies with. Construction activities that do not generate impacts beyond the site boundary are permissible outwith these hours.

7.47 The proposals are sites at a sufficient distance from any nearby noise sensitive receptors, with the nearest dwelling 1.9km away from the proposal. As confirmed by the councils Environmental Health Team, the construction site benefits from suitable topography, and given the separation distance, it is not anticipated that construction noise would not have an impact on the nearest noise sensitive receptors. The applicant has also confirmed working hours will be limited to weekdays and reduced on Saturdays which is welcomed.

7.48 Similarly, with the above the topography and separation distance between the proposed installations and the nearest noise sensitive property will provide reasonable protection from any noise emission. The application details that their noise consultant's professional opinion is that a BESS of 70MW or below has no noise impact at distances greater than 1km. The nearest dwelling is 1.9KM to the BESS compound. On the substation, the nearest receptor is circa. 1.3km. Environmental Health have no concerns about the potential for significant impact from operational noise at the BESS or substation extension. Nevertheless, the Council's standard noise levels for BESS and sublations should be secure by condition to fully ensure that there is no risk of noise disturbance.

7.49 It is anticipated that the construction phase will last between 6 to 12 months. A condition should be attached, to ensure of the provision of a construction noise mitigation scheme which demonstrates how the applicant/contractor will ensure the best practicable measures are implemented to reduce the impact of construction noise. Moreover, the applicant will require to submit a scheme of mitigation for construction dust, which is secured by condition as part of a Construction Environmental Management Plan. A condition is also attached regarding the provision of lighting in the application site to ensure any installed lighting scheme is appropriate to the development's location, in the interests of visual amenity.

Flood Risk and Drainage

7.50 The submitted Flood Risk Assessment Report in support of the application notes that the application site is not at flood risk from Coastal or Fluvial Flooding. This is further backed up by the councils Flood Team who advised that SEPA's online strategic flood mapping shows that the site lies outwith any areas of fluvial or coastal flooding

during a 200 year + climate change storm event, suggesting the flood risk from these sources may be low. In addition, SEPA's online strategic flood mapping, surface water and small watercourse layer shows small areas of pluvial flooding within or near the proposed substation extension, and the BESS site. The provided assessment states that with appropriate SuDS, the areas of development are not anticipated to be at flood risk. The councils Flood Team, state that given the landform and development type, there is no objection to pluvial flood risk being managed by an appropriate drainage system. It is also noted by the Flood Team that parts of the access route may be subject to pluvial or small watercourse, however the consultee declined to comment on this matter, with no overall objections raised in regard to flood risk.

7.51 The Drainage Impact Assessment advises that as the existing substation drainage system will be impacted by the proposed location of the extension, a swale would be constructed to attenuate surface water, ultimately discharging water into a tributary to the Reay Burn, which is accepted. The BESS compound is to incorporate a attenuation SuDS basin, discharging surface water at a restricted rate of 5l/s to a tributary of the Achvarasdal Burn. The detention basin would also be designed for the retention of firewater and would be fitted with a penstock valve. In consultation with the Flood Team, the draft design contains calculations to show that storage would cater for storm water at appropriate return periods and discharge rates, showing that exceeded water would be appropriately managed. Nevertheless, as advised by the Flood Team, a condition should be attached to secure the finalised drainage proposals to be submitted for review prior to the commencement of development.

7.52 The Proposed Development would not have a foul sewer connection. Foul drainage from staff welfare facilities on site would be disposed of either by a packaged biological foul treatment plant with discharge to the surface water system or to a storage tank for offsite disposal via road tanker.

Health and Safety

7.53 The submission includes an Outline Battery Storage Safety Management Plan (OBSSMP) associated to the proposed development. This sets out the measures to minimise the risk of fire, along with the specific design specifications of the BESS facility and procedures to address fire containment and firefighting. The Limekiln BESS units will most likely use Lithium Ferrous Phosphate (LFP) chemistry cells, but this is subject to advances in technology. Within the battery units, the safety features typically include internal electrical protection, separation layers, thermal monitoring, fire detection and suppression system and venting valves.

7.54 The applicants have confirmed that the batteries will be housed in containers which will be fitted with an Environmental Control Unit (ECU). The ECU maintains the temperature and humidity within the container, allowing the Lithium-ion batteries to operate within the optimum temperature range. The temperature of individual cells in each battery will be monitored by the Battery Management System (BMS). The BESS units will also be fit with various conditioning, fire detection and suppression systems. Engineers will also be dispatched to remove any failed batteries and replace with a serviceable item, as and when is required, identified by the various monitoring systems. The OBSSMP states that Health and Usage data for each BESS

is remoted to a centralised Control Room and the level of service of each battery is determined on an hourly basis. The application advises that given batteries only have a finite number of cycles, it is envisaged that the batteries will be renewed multiple times in the 40-year life of the site.

7.55 In terms of security the BESS Site will be secured by 3m high palisade fencing and monitored remotely via security cameras. Infrared night-time cameras, as well as standard cameras, will be in use to maintain security surveillance during hours of darkness. Warning signs will also indicate the presence of electrical storage facilities within the site.

7.56 The location of the facility ensures that there are no occupied buildings within 25m of the BESS units. The nearest residential properties are approximately circa. 2km from the proposal, as detailed within the provided assessments of the nearest noise sensitive receptors of interest to the proposals.

7.57 Fully implementable Fire Management and Emergency Response Plans require to be in place prior to the delivery of battery equipment to the site, which will be secured by condition. With these plans and procedures in place, the applicant has demonstrated that the proposal's significantly adverse impact on human health, safety, and the environment in the highly unlikely event of a battery fire has been duly considered and mitigated against. As such, the proposal complies with NPF4 Policy 23 for Health and Safety. It should be noted however that both plans will be working documents that will require updating from time to time in accordance with best practice and to take account of equipment and conditions on site. The regulation of fire safety, health, and other safety and environmental matters are not, however, matters for the planning service to regulate. Consequently, the ongoing currency of these documents will be the responsibility of the operator in consultation with the relevant agencies including the SFRS. The OBSSMP details the applicant's acceptance to liaise with relevant authorities and guidance in the development of emergency procedures

7.58 The site has two access points to the BESS compound to provide an alternative external access point for emergency services, particularly if the combination of wind direction and smoke made one direction particularly onerous. The BESS compound has a primary access to the site from the west and emergency access from the east. The designed looped access track around the BESS units is noted to allow emergency vehicle access to all battery units. The access of the public road is approximately 5m wide, with all internal service roads compatible with fire appliance. The BESS compound service roads are 4.0m wide running around the site allowing access to all BESS units, given the circular nature and compactness of the site the ability to drive-in and drive-out without the need for passing points or the need to reverse is provided. In terms of spacing between the BESS units, the application proposes a separation distance of 3m between each unit. The standard minimum spacing as distinguished within the NFCC guidance (2023) between units of 6 metres is not achieved within the proposed development. However, the applicant states that the NFCC guidance requirement references FM Global 5-33 (2017) which has since been updated in 2024 to a separation distance of 1.5m for Lithium-ion phosphate battery units as proposed within the application. The applicant justifies the 3m spacing stating that they are compliant to updated standards, with the draft updated NFCC guidance published in 2024 not referencing such spacing requirement. The

applicant states that the NFCC draft 2024 guidance references NFPA 855, which the proposed development complies with. As such, given the separation distance between the battery units is in line with the most recent technical standards for BESS facilities, the 3m spacing between units can be considered acceptable. Regarding, the requirement for 10m separation distance between combustible vegetation and the BESS units as noted in the NFCC guidance, the applicant has advised all areas within 10m of the BESS will be cleared of vegetation.

7.59 Following clarification with the applicant it has been confirmed that there will be 2 standby water tanks proposed on site within the planning submission, each with 230,000 litres total firefighting water capacity of 460,000 litres. The site's firewater containment has been designed to NFCC guidance with a 100% overbuild. NFCC currently requires capacity for a flow of 1,900 L/s sustained for 2 hours, equivalent to 228 m^3 of firewater. The site provides 460 m^3 of dedicated containment, which exceeds this requirement by 100%, providing up to provide up to 4 hrs of water in tanks on the site. All firefighting water runoff is directed into the SuDS attenuation pond to the north of the site which acts as a fully contained, isolated storage area during an incident. The application also confirms that should an event arise whereby the 460,000 L is depleted then the runoff water collected in the attenuation pond can be used and recycled back onto the fire. Concerns were raised by officers regarding the potential for contaminated firewater to be re-spread during a fire event. However, the applicant has confirmed that recycling of firewater would only ever occur during a live firefighting situation, and only where the Fire and Rescue Service deem that additional water supply is operationally required. Any such reuse would be strictly controlled and confined to the emergency response, meaning that any water or contaminants remain fully contained on-site. There is no intention to pump collected firewater back into the EWS tanks for long-term storage or future use, which is accepted. The application also advises that the platform shall be compacted hard stand on top of compacted ground and shall be non-permeable down to the drainage system. Further engineering will be carried out depending on the geotechnical conditions on-site, however there is an indication that the platform sits on non-permeable rock. Water from a fire or indeed storm is designed to flow into the drainage system due to site levels and will flow into the attenuation basin. The attenuation basin will be non-permeable and if necessary, lined with a non-permeable membrane or material.

7.60 The drainage attenuation basin is advised to be designed in line with SEPA guidelines to accommodate the required fire water volume and additional water if brought by fire authorities, acting as a containment lagoon. In the event of a fire, the penstock on the outflow of the drainage attenuation basin shall be valve controlled and interlocked via a control system with the fire alarm on the site, meaning the valve can be closed when a fire occurs. If the drainage system fails, the valve may also be manually operated to prevent the release of contaminated water. Following any fire incident, the contained water in the attenuation pond will be tested for contamination and if needed treated on site prior to discharge. Should this not be possible then the contained water will be taken off-site to an appropriate treatment facility, which is accepted by the Planning Authority.

7.61 Given the fire risks associated with lithium battery facilities, the SFRS has indicated that it will not be responding to individual planning applications. At this present time,

there is no formalised guidance available from SFRS on BESS site developments. In the absence of a national approach no regional office comment can be provided, however, general advice from NFCC has been passed on to help inform the Planning Authority's consideration of the application. This guidance suggests that consideration be given to the prevailing winds and emergency access, containment of contaminated water run-off from potential firefighting operations, and details to demonstrate the sources of water supplies for this development in the event of fire. This information would be required to be set out within a fire safety plan which can be secured via condition. This proposal is in general accordance with the NFCC guidance. A condition is suggested to secure details of the final layout of the proposal, which will be required to reflect best practice in that regard.

Traffic and Transport

7.62 The proposals are located within the footprint of the operational Limekiln Wind Farm, with the site entrance taken from the A836. The site is in connective distance to the A9 via A836 and U4724 Milton Road. The U4724, single track with passing places, was previously widened with unbound material in the verge to take construction traffic and wide loads. New access tracks were constructed off the U4724, and these are used for the maintenance of the existing wind farm development. The U4724 connects onto the wider public road network via the A836 and the A9. The port of entry is anticipated to be at Scrabster, with some of the proposed infrastructure such as the BESS units anticipated to be delivered to site from the port.

7.63 The proposed development will be accessed of the U4724 via the existing wind farm tracks which is accepted. The proposed BESS compound has two access junctions one from the southwest and another to the northeast, with the internal access tracks splitting throughout the BESS facility, allowing access to the compound from opposing directions in the event of emergency, in line with the NFFC guidance. The councils Transport Planning Team have reviewed the proposed access arrangements and raised no objections subject to conditions. As advised in the consultation response, the A836 and U4724 routes comprise a number of structures which will need to be assessed prior to commencement of the development. These include bridges, culverts, retaining walls, embankments, which should be secured as condition. The associated delivery loads will consist of battery unit loads at 32 tonnes and the overall weight for transport will exceed the 44 tonnes limit at around 55 tonnes. The heaviest load will be from the erection crane at no more than 72 tonnes. This load is of the same weight and dimensions of the recently completed wind farm transformer and would use the same access route and existing mitigation measures from Scrabster harbour. The application also demonstrates that the proposals will generate approximately 58 vehicle movements per day at the peak of construction. It is expected that during the peak month of construction, 32 two-way HGV movements will occur per day. A further 26 car and LGV trips would be created by construction staff travelling to and from the site. Once operational, the proposal would not be permanently manned, and the operational traffic will be of a minimum level and negligible impact on the wider public road network. Traffic management procedures have been proposed within the application however an updated CTMP in line with Transport Planning and Transport Scotland advice should be secured by condition.

7.64 Concerns associated to construction traffic have been covered by the attached conditions. Given the expected levels of operational traffic will be limited and will not be detrimental to the public road network and mitigated through conditions. Existing arrangements are in place following the formation of the access for the associated and adjacent wind farm developments, with all relevant conditions attached to secure mitigation measures and assessments where necessary. Transport Scotland are also satisfied with the proposals subject to conditions relating to abnormal load movements and traffic management.

Public Access

7.65 The Limekiln Forest core path CA11.03 intersects the access route to the proposal, in particular in between both the existing substation which is proposed to be extended as well as the proposed BESS infrastructure. The core path runs parallel to the indicative route for the grid connection cable between the BESS and existing substation. In consultation with the councils Access Officer, the core path network should be accessible to the public throughout the construction period of any development, as it was for the construction of the wind farm. Whist the councils Access Officer was not consulted by the applicant about any temporary disruption to the core path to allow the new grid connection cable installation. It has been advised that there may be scope for a temporary diversion to the southwest of the BESS compound of the core path network, to allow the installation of the underground cable alongside the core path. The Access Officer anticipates the expected time frame for the cable installation works along the core path to be a maximum of two weeks, particularly if no public is in use of the route at that time. In any case, as advised by the Access Officer, a recreational access management should be secured by condition to provided for approval by the Planning Authority prior to the start of the works.

Decommissioning and Reinstatement

7.66 The lifetime of the BESS compound is proposed for 40 years. While there is no suggestion to limit the lifetime of this development by condition, it is appropriate as well as required under NPF4 Policy 11 e) and HwLDP Policy 67 to condition an outline Decommissioning and Reinstatement Plan (DRP) prior to the commencement of development on site. The DRP shall inform measures to safeguard and guarantee finances, prior to the commencement of development, to effectively implement the DRP in the event the operator or owner is no longer solvent, which should also be secured by condition. The strategy and financial safeguard would also require to be reviewed at regular intervals.

Other material considerations

7.67 There are no other material considerations.

Matters to be secured by Legal Agreement / Upfront Payment

8.0 None prior to determination of the application. A financial guarantee to secure decommissioning of the site can be secured via condition. Similarly, Transport Planning have also advised that the applicant will require to enter into a Section 96 Legal Agreement to cover any excessive wear and tear on the local road network.

This is expected to be secured when assessing the provisions of the Construction Traffic Management Plan to be secured by condition.

9. CONCLUSION

9.1 The proposed development has the potential to play a role in addressing supply and demand peaks and troughs within the electricity transmission network by virtue of storing excess energy produced by generating stations, including from renewable sources such as the adjacent Limekiln Wind Farm. In that way, the proposal is considered to contribute to national climate change and carbon net-zero targets. It is a technology that has strong support within National Planning Framework 4 Policy 11 Energy. Following the submission of additional information particularly regarding suitable biodiversity enhancements, and fire risk mitigation it is considered that the proposed development is acceptable and will not be significantly detrimental overall. Although industrial in appearance, the proposal would be well sited, set back and contained within an existing forestry plantation, at a distance from the public roadside and residential properties.

10. IMPLICATIONS

10.1 Resource: There are significant staffing and financial resource implications if the application is to be subject to a Public Local Inquiry.

10.2 Legal: If an objection is raised to the proposal, the application may be subject to a Public Local Inquiry.

10.3 Community (Equality, Poverty and Rural): Not applicable

10.4 Climate Change/Carbon Clever: The proposal has the ability to make a meaningful contribution toward the production of renewable energy.

10.5 Risk: Not applicable

10.6 Gaelic: Not applicable

11. RECOMMENDATION

Action required before consultation response issued to Scottish Ministers: None.

It is recommended to RAISE NO OBJECTION to the application subject to:

A. The Committee granting delegated authority to the Area Planning Manager - North to agree the finished condition wording, with any substantive amendments to be subject to prior consultation with the Chair of the North Planning Applications Committee; and

B. The following conditions and reasons.

Conditions and Reasons to be attached to any Section 36 consent which may be approved

1. **Notification of Date of First Commissioning**

Written confirmation of the Date of First Commissioning and the Date of Final Commissioning shall be provided to the Planning Authority and the Scottish Ministers no later than one calendar month after those dates.

Reason: To allow the Planning Authority and Scottish Ministers to calculate the date of expiry of the consent.

2. **Commencement of Development**

(1) The Commencement of development shall be no later than 5 years from the date on which this consent is granted, or in substitution, such other period as the Scottish Ministers may hereafter direct in writing.

(2) Written confirmation of the intended date of Commencement of development shall be provided to the Planning Authority and the Scottish Ministers no later than one calendar month before that date.

Reason: To ensure that the consent is implemented within a reasonable period and to allow the Planning Authority and the Scottish Ministers to monitor compliance with obligations attached to this consent and deemed planning permission as appropriate.

3. **Non-assignation**

(1) This consent shall not be assigned without the prior written authorisation of the Scottish Ministers. The Scottish Ministers may authorise the assignation, with or without conditions.

(2) The Company shall notify the Planning Authority and the Scottish Ministers in writing of the name of the assignee, principal named contact and contact details within fourteen days of the consent being assigned.

Reason: To safeguard the obligations of the consent if transferred to another company.

4. **Serious Incident Reporting**

In the event of any breach of health and safety or environmental obligations relating to the Development during the period of this consent, the Company will provide written notification of the nature and timing of the incident to the Planning Authority and the Scottish Ministers, including confirmation of remedial measures taken and/or to be taken to rectify the breach, within 24 hours of the incident occurring.

Reason: To keep the Scottish Ministers informed of any such incidents which may be in the public interest.

Conditions to be attached to any deemed Planning Permission

5. **Commencement of Development**

(1) The development must be begun not later than the expiration of 5 years beginning with the date of this permission.

(2) Written confirmation of the intended date of Commencement of development shall be provided to the Planning Authority and the Scottish Ministers no later than one calendar month before that date.

Reason: **Reason**: In accordance with Section 58 of the Town and Country Planning (Scotland) Act 1997 (as amended).

6. **Accordance with Provisions of the Application**

(1) Permission is hereby granted for the erection and operation of a Battery Energy Storage System (BESS) facility and extension to the existing Limekiln Wind Farm Substation, with the following elements approved under this permission:

- Up to 90 battery storage units;
- Electrical substation extension and associated infrastructure;
- Power Conversion Units (PCS's);
- MV/LV PCS transformers;
- Control and switchgear building;
- MV/LV auxiliary transformer;
- Underground cable connection to 132 kV substation extension;
- 132 kV Breaker, 132/33 kV transformer and 33 kV breaker at the substation extension;
- Spare parts containers;
- Office / welfare facilities;
- Fire suppression systems;
- Water storage tanks;
- Back-up generator;
- Palisade fencing typically 3m high;
- CCTV cameras, lighting and fencing;
- Site access and internal access tracks;
- Biodiversity mitigation and enhancement;
- Drainage (including SuDS);
- Temporary construction compound (augmentation area); and
- Maintenance vehicle parking.

(2) Prior to the final commissioning of the development hereby approved, all elements of the development that relate to Part (1) above, and as approved in writing by the Planning Authority under Condition 7 below, along with site drainage and flood mitigation infrastructure, site security measures, and fire safety measures including the means of containment of fire suppressant materials shall be constructed and installed in full, made available for use, and thereafter maintained for this use for the lifetime of the development.

(3) In the event of the Development not storing and supplying electricity on a commercial basis to the grid network for a continuous period of 12 months from 50% or more batteries installed and commissioned from time to time, the Company shall immediately notify the Planning Authority in writing of that situation and shall, if the Planning Authority direct in writing, decommission the development and reinstate the site to the specification and satisfaction of the Planning Authority in accordance with an approved Decommissioning, Restoration, and Aftercare Plan, which shall be based on the principles of the Decommissioning, Restoration, and Aftercare Strategy approved under Condition 8 of this permission and updated according with the relevant guidance and best practice at the time. The Planning Authority shall have due regard to the circumstances surrounding the failure to store electricity.

At the time of the development's decommissioning, the development shall be decommissioned, the site restored, and aftercare undertaken in accordance with the approved Decommissioning, Restoration, and Aftercare Plan.

Reason: In order to clarify the terms of the planning permission and ensure the development proceeds as approved. To secure the decommissioning and removal of the development in an appropriate and environmentally responsible manner along with the restoration of the site in the interests of safety, amenity, and environmental protection.

7. **Final Layout, Design and Specifications**

(1) No development shall commence unless and until full siting and design details of the development including all proposed battery cabinets, buildings, and ancillary infrastructure hereby permitted, have been submitted to, and approved in writing by, the Planning Authority. These details shall include:

a. the make, model, design, power rating, sound power level of the batteries, the dimensions of the battery storage cabinets and ancillary infrastructure, control building, storage and office facilities to be installed, and show separation distances between battery storage units which shall comply with the prevailing fire safety legislation and best practice guidelines at the time of installation; and,

b. the external colour and/or finish of the storage containers, buildings, and ancillary infrastructure on site, which shall have a dark-neutral, non-reflective, semi-matte finish.

(2) No element of the development shall have any text, sign or logo displayed on any external surface, save those required by law under other legislation.

(3) Thereafter, the storage cabinets, buildings, and ancillary infrastructure shall be installed and operated in accordance with these approved details and, with reference to part (b) above, the storage containers, buildings, and ancillary infrastructure shall be maintained in the approved colour, free from rust, staining or discolouration until such time as the development is decommissioned.

All cables between the storage containers, buildings, and ancillary infrastructure shall be installed and kept underground.

Reason: To ensure the Planning Authority is aware of the development details and to protect the visual amenity of the area.

8. **Decommissioning, Restoration and, Aftercare**

(1) 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. The strategy shall outline measures for the decommissioning of the development along with the restoration and aftercare of the site, and shall include proposals for the removal of individual components of the development as well as the development as a whole as well as the treatment of ground surfaces, and, the management and timing of the works and environmental management provisions which shall include, but not be limited to, the following:

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;

c) 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 soil storage and management;

e) a surface water and groundwater management and treatment plan, including details of the separation of clean and dirty water drains, and location of settlement lagoons for silt laden water;

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.

Reason: To ensure the decommissioning and removal of the development, along with the site's restoration in an appropriate and environmentally responsible manner in the interests of safety, amenity, and environmental protection.

9. **Financial Guarantee**

No development shall commence until:

(1) Full details of a guarantee, bond or other financial provision to be put in

place to cover all of the decommissioning and site restoration measures outlined in the Decommissioning and Restoration Plan approved under Condition 8 of this permission have been submitted to, and approved in writing by, the Planning Authority. For the avoidance of doubt the bond must be able to be called upon by The Highland Council and be enforceable against the operator and landowner and/ or leaseholder; and

(2) Confirmation in writing by a suitably qualified independent professional that the amount of financial provision proposed under part (1) above is sufficient to meet the full estimated costs of all decommissioning, dismantling, removal, disposal / recycling, site restoration, remediation and incidental work, as well as associated professional costs, has been submitted to, and approved in writing by, the Planning Authority; and

(3) Documentary evidence that the guarantee, bond or other financial provision approved under parts (1) and (2) above is in place has been submitted to, and confirmation in writing that the financial provision is satisfactory has been issued by, the Planning Authority.

(4) Thereafter, the Operator, and Leaseholder and/or Landowner, shall:

a) Ensure that the guarantee, bond or other financial provision is maintained throughout the duration of this permission; and

b) Pay for the guarantee, bond or other financial provision to be subject to a review five years after the commencement of development and every five years thereafter until such time as the development is decommissioned and the site restored.

(5) Each review shall be:

a) conducted by a suitably qualified independent professional; and

b) published within three months of each five year period ending, with a copy submitted upon its publication to both the landowner(s) and the Planning Authority; and

c) approved in writing by the Planning Authority without amendment or, as the case may be, approved in writing by the Planning Authority following amendment to their reasonable satisfaction.

Where a review approved under part (c) above recommends that the amount of the guarantee, bond or other financial provision should be altered (be that an increase or decrease) or the framework governing the bond or other financial provision requires to be amended, the Operator, and Leaseholder and/or Landowner shall do so within one month of receiving that written approval, or another timescale as may be agreed in writing by the Planning Authority, and in accordance with the recommendations contained therein.

Reason: To ensure that there are sufficient funds to secure the implementation of the Decommissioning, Restoration, and Aftercare Plan at the time of the development's decommissioning.

10. **Drainage**

No development shall commence until details of the final surface water drainage design have been submitted to, and approved in writing by, the Planning Authority, in consultation with the Flood Risk Management Team. For the avoidance of doubt the submitted details shall also include the provision of a Drainage Impact Assessment. Thereafter, the development shall be constructed in accordance with the approved details, which shall be made available for use prior to the development's first occupation and maintained in perpetuity.

Reason: In order to ensure the site is adequately drained in accordance with the principles of Sustainable Urban Drainage Systems.

11. **External Lighting**

No development shall commence until full details of any external lighting to be used within the site and/or along its boundaries and/or access have been submitted to, and approved in writing by, the Planning Authority. Such details shall include full details of the location, type, angle of direction and wattage of each light which shall be so positioned and angled to prevent any direct illumination, glare or light spillage outwith the site boundary, and shall be Bat friendly. Thereafter only the approved details shall be implemented.

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

12. **Habitat Management Plan**

There shall be no Commencement of Development until a Habitat Management Plan (HMP) has been submitted to and approved in writing by the Planning Authority.

(1) The HMP shall set out proposed habitat management of the site during the period of construction, operation, and decommissioning, restoration and aftercare, and shall provide for the maintenance, monitoring and reporting of habitat on site.

(2) The HMP shall provide provision and details for regular monitoring and review to be undertaken against the HMP objectives and reasonable measures for securing amendments or additions to the HMP if the HMP objectives are not being met.

(3) Until otherwise approved in advance in writing by the Planning Authority, the approved HMP (as amended from time to time with written approval of the Planning Authority) shall be implemented in full in line with the timescales set out in the approved plan.

(4) GIS shapefiles of HMP areas shall be supplied with the HMP to the Planning Authority prior to the commencement of works.

Reason: In the interests of good land management and the protection of habitats.

13. **Species Protection**

(1) No development or Site Enabling Works shall commence until pre-construction ecological surveys are undertaken, which shall be undertaken at the appropriate time of year and no more than 3 months prior to works commencing on site, and a report of the survey has been submitted to, and approved in writing by, the Planning Authority. The surveys shall cover the application site including an appropriate buffer from its boundary and the HMP areas with the report including mitigation measures where any impact, or potential impact, on protected species including but not limited to otter or their habitat has been identified.

(2) In the event that works are intended to be carried out within the main bird breeding season, March through August inclusive, surveys for ground nesting birds shall be undertaken no more than 24 hours prior to any works commencing on site including site clearance works.

(3) Development and work shall progress in accordance with any mitigation measures contained within the approved report of survey and the timescales contain therein.

Reason: In the interest of protecting ecology, protected species including nesting birds, and their habitats.

14. **Nesting Birds**

Construction works have the potential to disturb nesting birds or damage their nest sites. As such, a nesting bird survey shall be undertaken, not more than 24 hours prior to the commencement of development if this coincides within the bird breeding season (December - August inclusive) and throughout the breeding bird season if new areas are being developed or there has been a break in construction.

Reason: To ensure that the site and its environs are surveyed and the construction and operation of the development does not have an adverse impact on protected nesting birds.

15. **Construction Environment Management Plan (CEMP)**

No development shall commence until a Construction Environment Management Document (CEMP) containing site specific details of all on-site construction works, post-construction reinstatement, drainage and mitigation, together with details of their timetabling, has been submitted to, and approved in writing by the Planning Authority. The CEMP shall be informed by the site and ground investigation works and best practice guidance.

The CEMP shall include:

a) a Pollution Prevention and Incident Plan incorporating a Pollution Prevention Plan, Pollution Incident Plan and a Pollution Control

Monitoring Plan, this shall provide measures to protect watercourses, groundwater, management of natural surface hydrological flows (flushes, springs, etc.) and protection of peatland/soils, arrangements for the protection against construction dust, in addition to proposals for the storage and management of oil and fuel and other chemicals on the site and sewage disposal and treatment;

b) measures to reduce the risk of invasive non-native species from being introduced and spread directly via SUDS overflow, or indirectly through contaminated vehicles or materials from other construction sites;

c) details of temporary site illumination, including measures to ensure light spill/pollution is minimised and avoids habitats within the site and does not extend beyond the immediate working area, and not beyond the site boundary;

d) Protected Species Plan. The Plan shall be informed by pre-construction surveys carried out by a suitably qualified person, within 3 months prior to works commencing on site. The surveys shall inform the mitigation measures required to protect Otter, Badger, Pine Marten, bats, reptiles, Crossbills and any other protected species found during construction of the Development. The Plan shall provide mitigation measures, as required, and a timetable for implementation.

e) Site-specific Construction Method Statements for the following:

    i. working cable trenches;
    ii. Energy storage compound formation and installation of energy storage equipment;
    iii. Substation compound formation, erection of associated buildings and ancillary infrastructure;

f) details of post-construction restoration/reinstatement of the working areas not required during the operation of the Development;

g) Construction Method Statements for the cable trenches; and

h) A phasing plan for the construction works;

3. The Development shall be implemented in accordance with the CEMP approved under part (1) unless otherwise approved in advance in writing by the Planning Authority.

Reason: To ensure that all construction operations are carried out in a manner that minimises their impact on the environment, and that the mitigation measures contained in the Supporting Environmental Appraisal Report accompanying the application, or as otherwise agreed, are fully implemented.

16. **Ecological Clerk of Works**

No development shall commence until the terms of appointment of a suitably qualified, experienced, and independent Ecological Clerk of Works ("ECoW") by the applicant, have been submitted to, and approved in writing by, the Planning Authority.

The terms of appointment shall:

a) impose a duty to monitor compliance with the ecological and hydrological commitments provided in the Construction and Environmental Management Plan, the Habitat Management Plan and any Species Protection Plans ("the ECoW works");

b) require the ECoW to report to the 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 quarterly report to the Planning Authority summarising works undertaken on site; and

d) require the ECoW to report to the Planning Authority any incidences of non-compliance with the ECoW works at the earliest practical opportunity, and no later than 5 working days following the incidence of non-compliance.

The ECoW shall thereafter be appointed on the terms approved throughout the period from pre-construction works, Commencement of Development to completion of construction works, and post-construction site reinstatement works.

Reason: To secure effective monitoring of and compliance with the environmental mitigation and management measures associated with the Development during the construction and postconstruction restoration phases.

17. **Construction Traffic Management Plan (CTMP)**

(1) No development shall commence on site until a finalised Construction Traffic Management Plan has been submitted to, and approved in writing by, The Council in consultation with Police Scotland and Transport Scotland. The construction traffic management plan 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) Identification of sources for materials, as well as full details of the volume of materials that need to be imported into the site to form access tracks, hardstanding's and foundations, the load size of material deliveries, the number of HGVs for the importation and exportation of materials, and the number of HGVs for the delivery for

associated infrastructure.

c) Details of the number of staff journeys for each stage of construction, and full details of the width and length of access tracks, platforms and foundations and their proposed type of construction.

d) Scheduling and timing of movements, including information on the key milestones throughout the construction period, avoiding local school peak travel times, and any large public event taking place in the local area which would be unduly affected or disrupted by construction vehicles using the public road network;

e) Traffic management measures on the routes to site for construction traffic including details of traffic management proposals to prevent HGVs meeting on the private access to the site or at its junction with the public road. In addition, 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 Quality Assured traffic management consultant, to be approved by the Local Roads Authority before delivery commences;

f) Measures to mitigate the impact of general construction traffic, including cumulatively with surrounding developments, on the routes to site following detailed engineering assessment of the relevant roads;

g) A risk assessment for transportation during daylight hours and hours of darkness.

h) A procedure for condition surveys of the site access and construction traffic routes along with the regular monitoring of road conditions and the implementation of any remedial works required during the construction period;

i) Measures to ensure that all affected public roads are kept free of mud and debris arising from the development;

j) Provisions for emergency vehicle access;

k) A timetable for implementation of the measures detailed in the CTMP; and

l) Identification of a nominated person to whom any road safety issues can be referred and measures for keeping the Community Council informed and dealing with queries and any complaints regarding construction traffic.

(2) In the event that Abnormal Indivisible Loads (AIL) are required, prior to the delivery of any AIL to the site, the CTMP shall be updated to include the proposed route for any AIL on the public road network along with any accommodation measures required, including the removal of street furniture, junction widening, and traffic management measures.

Thereafter the approved CTMP shall be implemented in full prior to development commencing and remain in place until the development is complete.

Reason: To minimise interference with the safety and free flow of the traffic on the public road network, to ensure the safety of pedestrians and cyclists using the public road network and adjacent facilities, and to be consistent with current guidance and best practice.

18. **Abnormal Loads**

Prior to commencement of deliveries to site, should any abnormal loads be identified, an Abnormal Indivisible Loads Plan shall be submitted to, and approved in writing by the Planning Authority, in consultation with Transport Planning and Transport Scotland. For the avoidance of doubt the submitted plan shall include:

a) A detailed assessment of structures along the routes to be carried out in consultation with and the satisfaction of the Council's Structures Section for both Abnormal Load movements and general construction traffic.

b) Full details of all road improvements and mitigation measures needed to facilitate abnormal load movements and general construction traffic shall be agreed with the Council. The said measures shall be fully implemented to the satisfaction of the Council. Such measures may include: modifications to bridges and culverts, carriageway widening and/or edge strengthening, road safety improvements and traffic management.

c) A contingency plan prepared by the abnormal load haulier. The plan shall be adopted only after consultation and agreement with the Police and the respective Roads Authorities. It shall include measures to deal with any haulage incidents that may result in public roads becoming temporarily closed or restricted.

d) A detailed protocol for the delivery of abnormal loads/vehicles, prepared in consultation and agreement with interested parties. The protocol shall identify any requirement for convoy working and/or escorting of vehicles and include arrangements to provide advance notice of demountable signs or similar approved, shall be established when required, to alert road users and local residents of expected abnormal load movements. All such movements on Council maintained roads shall take place outwith peak times on the network including school travel times and shall avoid local community events.

e) A detailed delivery programme for abnormal load movements which shall be made available to Highland Council and community representatives.

Thereafter, the approved details shall be adhered to in full.

Reason: To ensure that the transportation of abnormal loads will not have any detrimental effect on the trunk road and local road networks.

19. **Fire Risk Management and Emergency Response Procedures**

Prior to the first commissioning of the development hereby approved the following documents shall be submitted to, and approved in writing by, the Planning Authority in consultation with the Scottish Fire and Rescue Service:

i. a complete and fully implementable Fire Risk Management Plan; and,
ii. a complete and fully implementable Fire Emergency Response Plan.

The developer shall thereafter undertake any review and amendment to both documents as may be required from time to time, in consultation with the relevant agencies.

Reason: In order to provide the Planning Authority sight of onsite management practices and procedures as they relate to fire risk management and fire emergency response, and to ensure the ongoing currency of both plans in the interests of human health, safety, amenity, and environmental protection.

20. **Water Supply**

No development shall commence until full details of the water supply to serve the development for the suppression of fire have been submitted to, and approved in writing by, the Planning Authority. These details shall demonstrate:

a) confirmation from Scottish Water that sufficient capacity is reserved at its water treatment plant to serve the development;

Or,

that the development can be sufficiently served by a private water supply through an appraisal specifying the means by which a water supply shall be provided and thereafter maintained to the development. This appraisal, which shall be carried out by an appropriately qualified person(s), shall demonstrate that the sufficiency of any other supply in the vicinity of the development, or any other person utilising the same source or supply, will not be compromised by the proposed development. The development itself shall not be occupied until the supply has been installed in accordance with the approved specification.

Reason: To ensure that an adequate water supply can be provided to meet the requirements of the proposed development and, where relevant, without compromising the interests of other users of the same or nearby private water supplies.

21. **Record Keeping**

The Operator shall, at all times after the first commissioning of the development, record information regarding the details of power stored and generated, inclusive of dates and times of any failures, and retain the information in perpetuity. The information shall be made available to the Planning Authority within one month of any request by them.

Reason: To ensure end of life decommissioning of the site.

22. **Socio-Economic Benefit**

Prior to the Commencement of Development, a Local Employment Scheme for the construction of the development shall be submitted to and agreed in writing by the Planning Authority.

The Scheme shall include the following:

a) details of how the initial staff/employment opportunities at the development will be advertised and how liaison with the Council and other local bodies will take place in relation to maximising the access of the local workforce to information about employment opportunities;

b) details of how sustainable training opportunities will be provided for those recruited to fulfil staff/employment requirements including the provision of apprenticeships or an agreed alternative;

c) a procedure setting out criteria for employment, and for matching of candidates to the vacancies;

d) measures to be taken to offer and provide college and/or work placement opportunities at the development to students within the locality;

e) details of the promotion of the Local Employment Scheme and liaison with contractors engaged in the construction of the development to ensure that they also apply the Local Employment Scheme so far as practicable having due regard to the need and availability for specialist skills and trades and the programme for constructing the development;

f) a procedure for monitoring the Local Employment Scheme and reporting the results of such monitoring to the Council; and

g) a timetable for the implementation of the Local Employment Scheme.

Thereafter, the development shall be implemented in accordance with the approved scheme.

Reason: In order to ensure compliance with NPF4 Policy 11c) and to maximise the local socio-economic benefits of the development to the wider community. To make provision for publicity and details relating to any local employment opportunities.

23. **Site Security**

No development shall commence until full details of site security measures, have been submitted to, and approved in writing by, the Planning Authority. Thereafter, the approved details shall be implemented in full prior to the energisation date and remain in place until otherwise agreed in writing by the Planning Authority.

Reason: In the interests of amenity.

24. **Private Water Supply**

A private water supply risk assessment which identifies any supply, including pipework, which may be adversely affected by the development shall be submitted for the approval in writing of the Planning Authority prior to the commencement of development. A report which includes details of the measures proposed to prevent contamination or physical disruption shall thereafter be submitted for the written approval of the Planning Authority. The report shall include details of any monitoring prior to, during and following construction and proposals for contingency measures in the event of an incident. Highland Council has some information on known supplies which can be provided on request however, it is not definitive. An on-site survey will be required.

Reason: To ensure that an adequate water supply can be provided to meet the requirements of the proposed development and, where relevant, without compromising the interests of other users of the same or nearby private water supplies.

25. **Recreational Access Management Plan**

No development shall commence until a Recreational Access Management Plan which details public access across the site (as existing, during construction and following completion) has been submitted to, and approved in writing by, the Planning Authority. The plan shall include full details of:

a) How access will be managed on the existing wind farm access track from Milton to the substation and core path, if no construction works are required on the track, then it shall remain open at all times. It is acknowledged that the underground cable crosses this track and a schedule for these works (timescale, stage of construction) shall be provided.

b) How access will be managed on the existing wind farm access track from the proposed BESS site towards Broubster Forest, if no construction works are required on the track, then it shall remain open at all times.

c) Details of any construction signs which will be placed on the core path to ensure the public are aware of nearby construction works whilst

public access is maintained.

d) Schedule of works (timescale, stage of construction) for the installation of the underground cable alongside the core path. Details of signs on the core path during these works and how the shorter diversion will be promoted.

e) Information as to how the management of public recreational access will be promoted to the wider public during the construction works. Ideally on-site signs in advance of any activity/closures, website detailing the same, communication with community council/community liaison group.

Thereafter, the approved plan shall be implemented in full prior to the energisation date of the development or as otherwise may be agreed within the approved plan.

Reason: In order to safeguard public access both during and after the construction phase of the development.

26. **Compensatory Planting**

At least three months prior to commencement of development, a detailed Compensatory Planting Plan (including future maintenance) must be submitted and approved in writing by the planning authority, following consultation with Scottish Forestry and any other relevant stakeholders.

The area of planting shall be no less than 1.88 hectares in size, consisting primarily of productive species and located within the Highlands.

The area identified for compensatory planting may also need to be considered under The Forestry (Environmental Impact Assessment) (Scotland) Regulations 2017, where this exceeds the current thresholds.

The Compensatory Planting Plan must follow the same process as required for preparing a woodland creation proposal, as set out in the Scottish Forestry publication: Woodland Creation Application Guidance. The Compensatory Planting Plan must be prepared by and then implemented under the supervision of a suitably qualified forestry consultant, approved by the planning authority. The appointed forestry consultant must provide a detailed timescale for delivery and schedule of supervision, with compliance monitoring reports to be issued at agreed stages.

The approved Compensatory Planting Plan must be implemented in full, prior to first commissioning of the development. The compensatory planting shall be maintained thereafter in accordance with the approved scheme, until established to the full satisfaction of the planning authority and then shall remain as woodland in perpetuity.

To comply with the Felling Permission exemptions, woodland removal must not begin until the applicant can demonstrate that construction work is

imminent. In the event that development fails to commence within 3 years of the initial felling, then the land use shall revert back to woodland and the area must be replanted within 12 months, to a specification approved by the planning authority.

Where compensatory planting takes place on land located outside the planning application boundary and/or is not under the ownership of the applicant, a Section 75 legal agreement must first be secured between the applicant, the landowner and the planning authority.

The applicant must provide the planning authority with a GIS shapefile clearly identifying the approved area(s) of woodland removal and the associated area(s) of compensatory planting.

Reason: To protect Scotlands woodland resource, in accordance with the Scottish Governments policy on the Control of Woodland Removal.

30. **Operational Noise**

Noise arising from the development, when measured and/or calculated as an LZeq, 5min, in the 100Hz one third octave frequency band must not exceed 30 dB, at the curtilage of any noise sensitive premises.

In order to safeguard the amenity of neighbouring properties and occupants.

31. **Operational Noise**

The Rating Level of noise arising from this development as determined in accordance with BS4142 Methods for Rating and Assessing Industrial and Commercial Sound shall not exceed measured background LA90 at the curtilage of any noise sensitive receptor.

Reason: In order to safeguard the amenity of neighbouring properties and occupants.

31. **Data**

No development shall commence until GIS shapefiles of the offsetting and enhancement areas have been submitted to, and approved in writing by, the Planning Authority. Thereafter, works shall progress in accordance with the approved details and be maintained for this use in perpetuity.

Reason: To allow the offsetting and enhancement areas to be mapped to ensure no inappropriate developments occur on these sites for a minimum of 30 years.

Signature:

Designation: Area Planning Manager – North

Author: Liam Burnside

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

Relevant Plans:

Plan 1 - 000001 - Location Plan

Plan 2 - 000002 – Site Layout Plan

Plan 3 - 000003 – Site Layout Plan - Detail

Plan 4 - 10 REV 1 – Floor/Elevation Plan – BESS Container

Plan 5 - 11 REV 1 - Section Plan - Access Track

Plan 6 - 12 REV 1 - Section Plan – BESS and PCS

Plan 7 - 13 REV 1 – Site Layout Plan – BESS Platform Earthworks

Plan 8 - 14 REV 1 – Site Section Plan – Substation Extension

Plan 9 - 15 REV 1 – Elevation Plan - Fence

Plan 10 - 16 REV 1 – Elevation Plan – Lighting and CCTV Columns

Plan 11 - 4 REV 1 – Proposed Site Layout Plan – BESS Platform

Plan 12 - 6 REV 1 – Elevations – BESS Platform

Plan 13 - 7 REV 1- Elevation Plan – Substation Extension

Plan 14 - 8 REV 1 – Floor/Elevation Plan – Control Room

Plan 15 – 9 REV 1 – Floor/Elevation Plan - PCS

Appendix 1 – Letters of Representation

None

Appendix 2: Development Plan and Other Material Policy Considerations

DEVELOPMENT PLAN

The following policies are relevant to the assessment of the application:

National Planning Framework 4 (2023) (NPF4)

Policy 1 - Tackling the Climate and Nature Crises
Policy 2 - Climate Mitigation and Adaptation
Policy 3 - Biodiversity
Policy 4 - Natural Places
Policy 5 - Soils
Policy 6 - Forestry, Woodland and Trees
Policy 7 - Historic Assets and Places
Policy 11 - Energy
Policy 14 - Design Quality and Place
Policy 20 - Blue and Green Infrastructure
Policy 22 - Flood Risk and Water Management
Policy 23 - Health and Safety
Policy 25 - Community Wealth Building

Highland Wide Local Development Plan 2012 (HwLDP)

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
67 - Renewable Energy Developments
69 - Electricity Transmission Infrastructure
72 - Pollution

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

No specific policies apply.

Highland Council Supplementary Planning Policy Guidance

Biodiversity Enhancement Planning Guidance (May 2024)
Construction Environmental Management Process for Large Scale Projects (Aug 2010)
Developer Contributions (Mar 2018)
Flood Risk and Drainage Impact Assessment (Jan 2013)
Highland's Statutorily Protected Species (Mar 2013)
Highland Renewable Energy Strategy and Planning Guidelines (May 2006) Managing Waste in New Developments (Mar 2013)
Physical Constraints (Mar 2013)
Public Art Strategy (Mar 2013)
Sustainable Design Guide (Jan 2013)
Trees, Woodlands and Development (Jan 2013)

OTHER MATERIAL POLICY CONSIDERATIONS

Scottish and UK Government Planning Policy and Other Guidance

Control of Woodland Removal (2009)

Onshore Wind Policy Statement (Dec 2022)

Scottish Energy Strategy (2017)

Draft Energy Strategy and Just Transition Plan (2023)

2020 Routemap for Renewable Energy (Jun 2011)

Energy Efficient Scotland Route Map (May 2018)

PAN 1/2021 – Planning and Noise (Mar 2011)

PAN 68 – Design Statements (Aug 2003)

Health and Safety Guidance for Grid Scale Electrical Energy Storage Systems' (UK Government, Mar 2024)

Grid Scale Battery Energy Storage System Planning – Guidance for Fire and Rescue Service (2023)

Appendix 3 - Compliance with the Development Plan / Other Planning Policy National Policy

National Planning Framework 4

At the high level, NPF4 considers that Strategic Renewable Electricity Generation and Transmission Infrastructure will assist in the delivery of the Spatial Strategy and Spatial Priorities for the north of Scotland, and, that Highland can continue to make a strong contribution toward meeting Scotland's ambition for net zero. Alongside these ambitions, the strategy for Highland aims to protect environmental assets as well as to stimulate investment in natural and engineered solutions to address climate change (NPF4 page 26).

Since its adoption, NPF4 Policies 1, 2, and 3 now apply to all development proposals Scotland-wide, which means that significant weight must be given to the global climate and nature crises when considering all development proposals, as required by NPF4 Policy 1. To that end, development proposals must be sited and designed to minimise lifecycle greenhouse gas emissions as far as is practicably possible in accordance with NPF4 Policy 2, while proposals for major developments must conserve, restore, and enhance biodiversity, including nature networks, so they are in a demonstrably better state than without intervention, as required by NPF4 Policy 3 b).

NPF4 Policy 4 compliments the above policies by setting out the developer and officer requirements for ensuring that protected species are given adequate consideration prior to an application's determination. NPF4 Policy 5 for Soils seeks to protect carbon-rich soils, and restore peatlands, and minimise disturbance to soils from development. To that end, the application requires to demonstrate that the mitigation hierarchy has been followed in siting the facility. In other words, that the proposal has sought to avoid carbon-rich soils and peat, and/or prime agricultural land in the first instance, and then minimise disturbance where this is unavoidable, and to include adequate mitigation, compensation, and enhancement measures for any disturbance. Similarly, NPF4 Policy 6 for Forestry, woodland and trees aims to protect and expand forests, woodland and tree coverage including individual trees of high biodiversity value, or identified for protection in the Forestry and Woodland Strategy.

NPF4 Policy 20 for Blue and Green Infrastructure supports facilities that design protect and enhance blue and green infrastructure and their networks by making climate mitigation, nature restoration, biodiversity enhancement, flood prevention and water management integral to design. In this instance drainage within the proposal site will require to be managed through a sustainable urban drainage systems (SUDS), which should seek to minimise the area of impermeable surfaces pursuant to Policy 22 for Flood risk and water management. Policy 23 for Health and safety is also relevant to the assessment as it seeks to protect people and places from environmental harm, mitigate risks arising from safety hazards, and encourage, promote, and facilitate development that improves health and wellbeing. Furthermore, NPF4 Policy 25 for Community Wealth Building sets out at Part a) that development proposals should contribute to local or regional community wealth building strategies and be consistent with local economic priorities.

While the above policies are salient to the proposal's assessment, the principal policy for assessing energy developments is NPF4 Policy 11 for Energy. The policy sets out the Development Plan's in-principle support for all forms of renewable, low-carbon, and zero

emission technologies, including BESS facilities. Part c) of the policy qualifies this position by stating that energy proposals should only be supported where they maximise net economic impact including local and community socio-economic benefits such as employment, associated business, and supply chain opportunities. The policy goes on to state at part e) that while significant weight will be placed on the contribution of the proposal to renewable energy generation targets and on reduction of greenhouse gas emissions targets, the development's impacts, including cumulative impacts, must be suitably addressed and mitigated against. These considerations are not a policy test and relate to matters of: impacts on communities and individual dwellings in relation to amenity; landscape and visual impacts; public access; aviation and defence interests; telecommunications; traffic; historic environment; ecology and biodiversity (including birds); impacts on trees; and decommissioning and site restoration.

Highland-wide Local Development Plan (HwLDP)

The principal policy for assessing renewable energy developments within the Local Development Plan is HwLDP Policy 67, which sets out that renewable energy development should be well related to the source of the primary renewable resource needed for its operation. However, for BESS technology, the source is considered to be the national grid rather than wind or watercourses given that the energy is already generated; with the purpose of the BESS being to provide support for a balanced grid. The policy requires an assessment of the proposal's contribution in meeting renewable energy targets as well as its positive and negative effects on the local and national economy, and, its compliance with all other relevant policies of the Development Plan. The policy is supportive of renewable energy developments that are located, sited, and designed such that they will not be significantly detrimental overall, either individually or cumulatively with other similar developments, having regard to the 11 specified criteria. Such an approach is considered consistent with the concept of HwLDP Policy 28 Sustainable Design along with the concept of achieving the right development in the right place and not to allow development at any cost.

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

There are no site specific or wider policies within CaSPlan which are relevant to the proposed development.

Onshore Wind Energy Supplementary Guidance (OWESG)

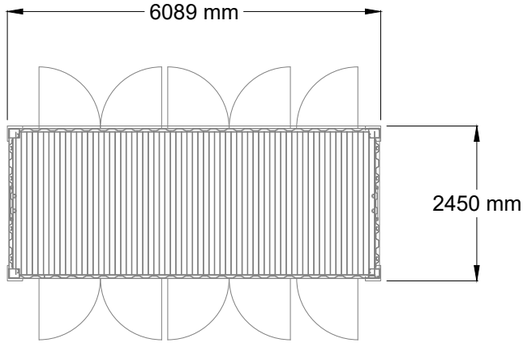
While not directly relevant to the proposal, the Onshore Wind Energy Policy Statement (OWEPS) recognises that balance is required and that no one technology can allow Scotland to reach its net zero targets. As such, the document sets out the Scottish Government's support for the co-locating of BESS facilities with onshore wind to help balance electricity demand and supply and add resilience to the energy system while acknowledging that on-site battery storage not only reduces pressures from the grid but enables more locally focussed energy provision while reducing costs to consumers.

Draft Energy Strategy and Just Transition Plan (2023)

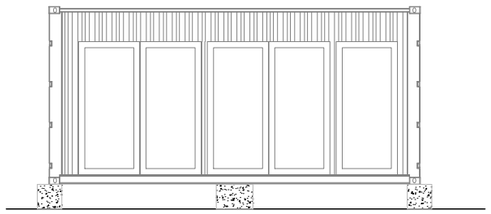
The Draft Energy Strategy and Just Transition Plan acknowledges that BESS can increase flexibility to our electricity system and provide wider benefits for consumers and society. The

draft sets out that by September 2021, Scotland had approximately 864MW of installed electricity storage capacity with 2.2GW of battery storage approved through the planning system, but that Scotland requires to increase its storage capacity significantly. Since that publication, the published Quarter 2 2024 Energy Statistics for Scotland show that there is currently an estimated 12 BESS facilities under construction across Scotland, which will increase battery storage capacity by 1.4GW and that there is a total of 18.6GW of BESS projects in the pipeline, that is schemes that are in planning, awaiting construction or undergoing construction, of which this application is only one.

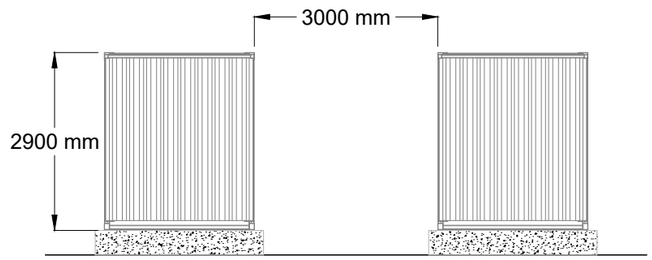
INDICATIVE BESS CONTAINER DETAILS



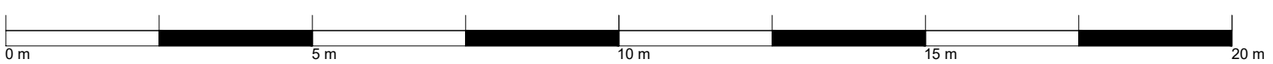
BESS CONTAINER PLAN
SCALE 1:100



BESS CONTAINER FRONT ELEVATION
SCALE 1:100



BESS CONTAINER END ELEVATIONS
SCALE 1:100



NOTES:

1. THIS DRAWING IS INDICATIVE FOR PLANNING PURPOSES ONLY.
2. FINAL SELECTION OF EQUIPMENT SUBJECT TO DETAILED DESIGN POST PLANNING PERMISSION.

Title:
INDICATIVE BESS CONTAINER DETAILS

Project:
LIMEKILN BESS

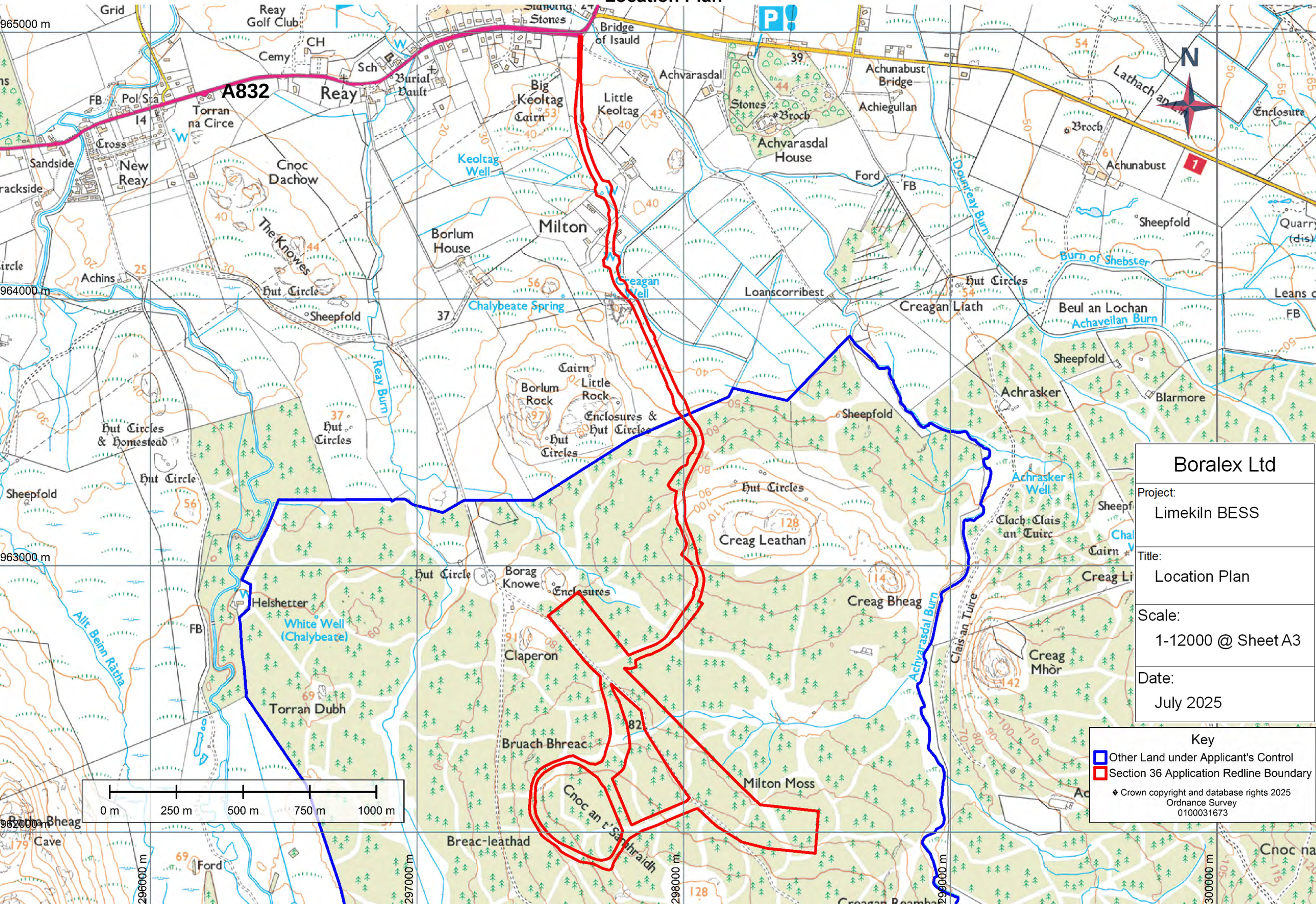
Source:

Client:

Drawn by:
SPD

Date:	**Number:**
JULY 2025	10
Scale:	**Revision no:**
1:100 @ A3	1

Location Plan



Boralex Ltd

Project: Limekiln BESS

Title: Location Plan

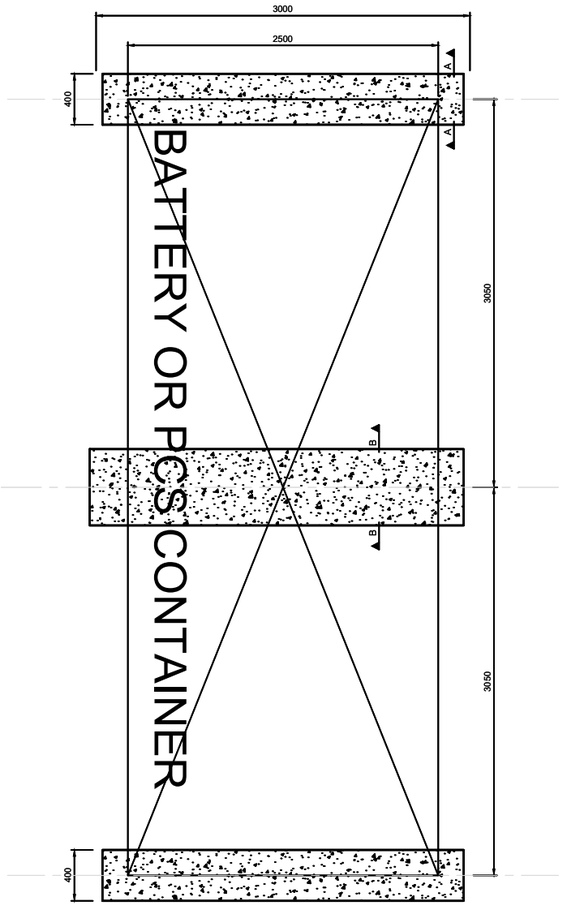
Scale: 1-12000 @ Sheet A3

Date: July 2025

Key

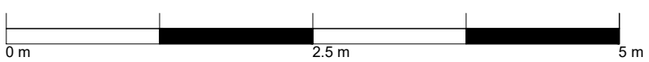
- Other Land under Applicant's Control
- Section 36 Application Redline Boundary

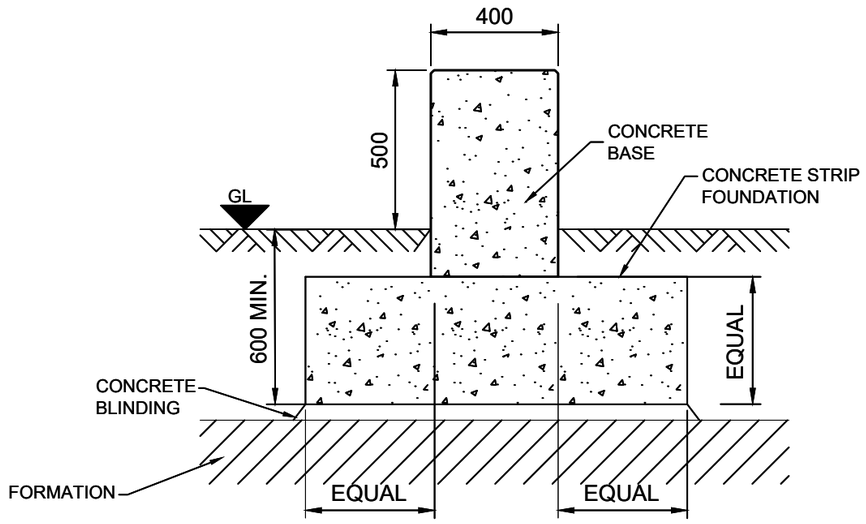
INDICATIVE BESS & PCS FOUNDATIONS PLAN AND SECTIONS



INDICATIVE BESS AND PCS FOUNDATION PLAN

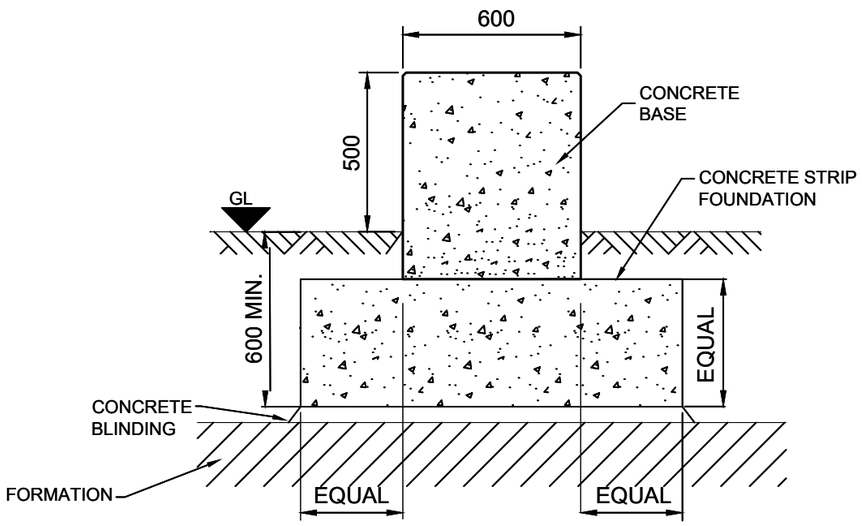
SCALE 1:50 @ A3





SECTION A-A THROUGH BESS & PCS FOUNDATION

SCALE 1:20 @ A3



SECTION B-B THROUGH BESS & PCS FOUNDATION

SCALE 1:20 @ A3

NOTES:

1. THIS DRAWING IS INDICATIVE FOR PLANNING PURPOSES ONLY, NOT FOR CONSTRUCTION.
2. FINAL SELECTION OF EQUIPMENT SUBJECT TO DETAILED DESIGN POST PLANNING PERMISSION.
3. DO NOT SCALE FROM THIS DRAWING.
4. DRAWING SHOWS INDICATIVE FOUNDATION DETAILS FOR BOTH BATTERY ENERGY STORAGE SYSTEM (BESS) CONTAINERS AND POWER CONVERSION SYSTEM (PCS) CONTAINERS.
5. DRAWING SHOWS DESIGN INTENT BASED ON STANDARD 8' HIGH CUBE SHIPPING CONTAINER TYPE DESIGN. DIMENSIONS MAY CHANGE IF ALTERNATIVE PCS OR BESS CONTAINER FOOTPRINT IS SELECTED AT DETAILED DESIGN STAGE

Title:
INDICATIVE BESS & PCS FOUNDATIONS PLAN AND SECTIONS

Project:
LIMEKILN BESS

Source:

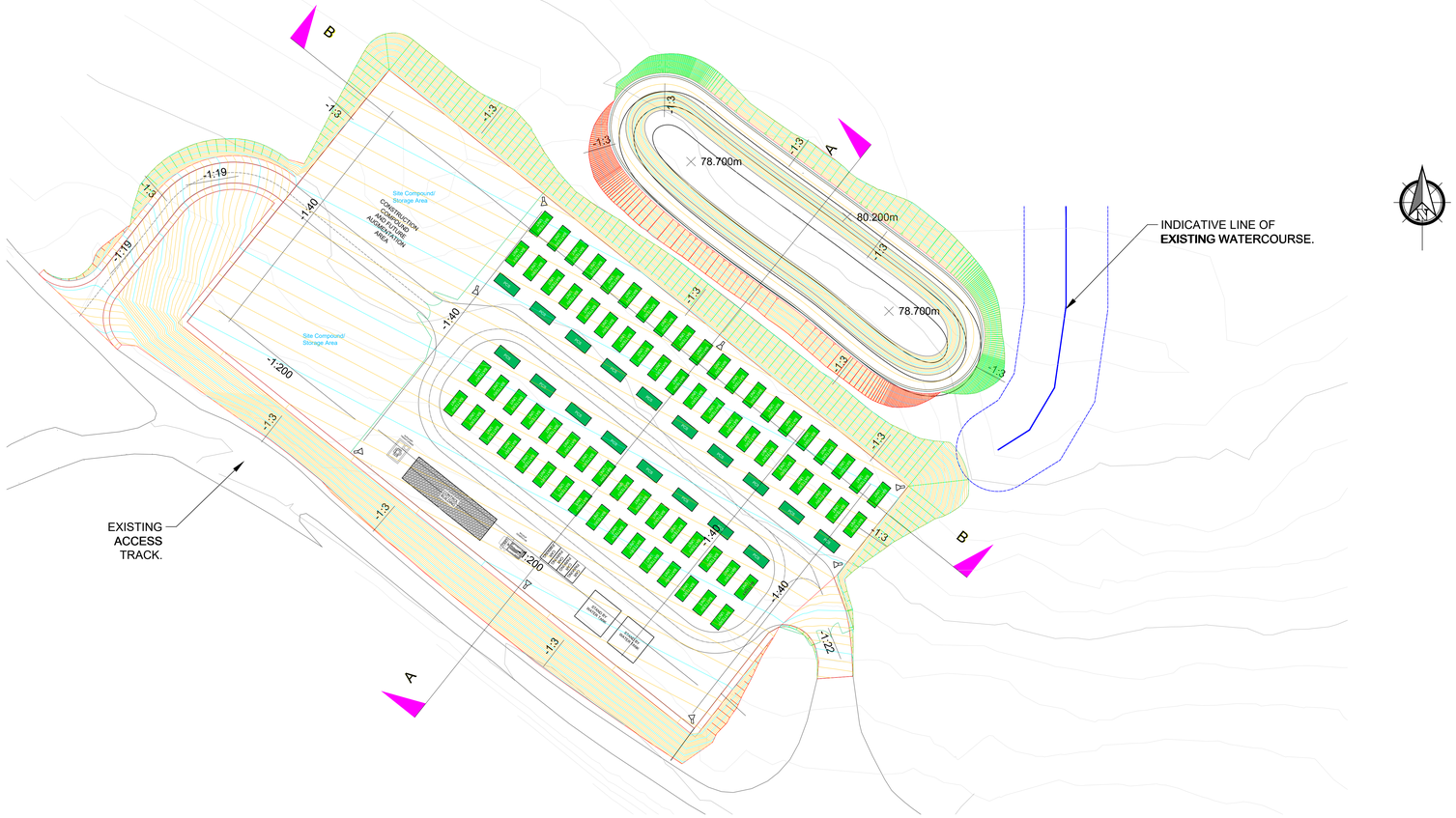
Client:

Drawn by:
SPD

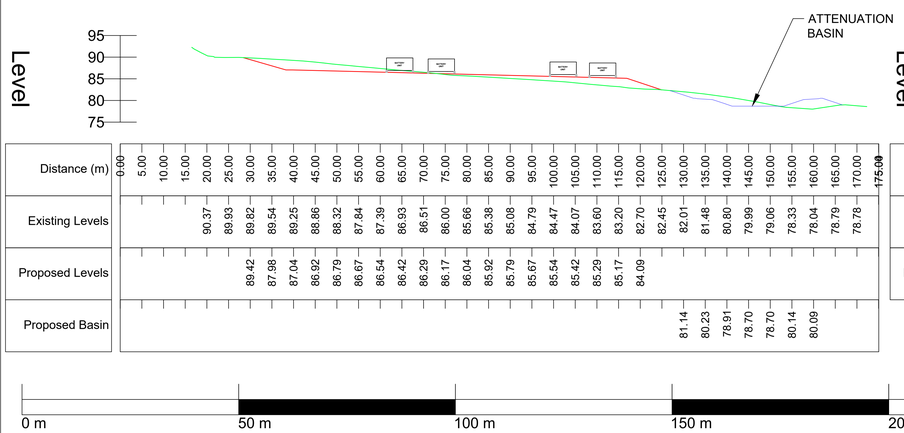
Date:	Number:
JULY 2025	12
Scale:	**Revision no:**
AS INDICATED @ A3	1

INDICATIVE BESS PLATFORM EARTHWORKS

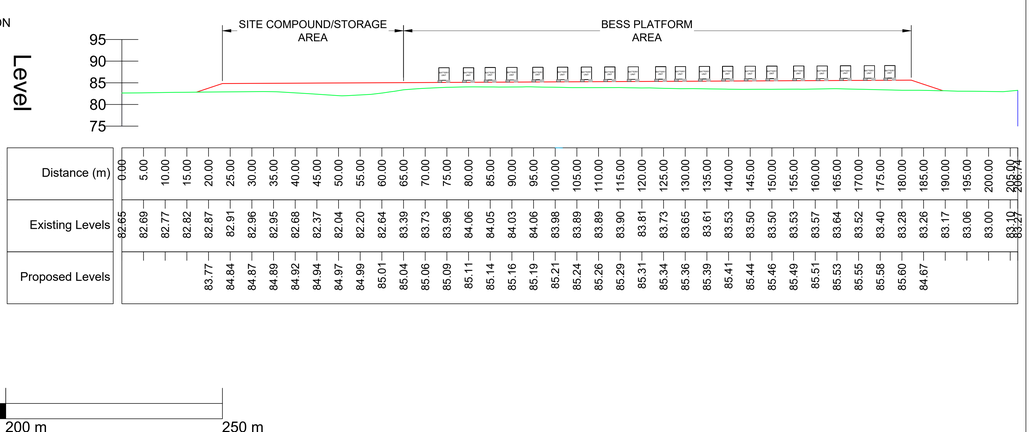
BORALEX



A - LONGSECTION
SCALE: H 1:500,V 1:500. DATUM: 75.000



B - LONGSECTION
SCALE: H 1:500,V 1:500. DATUM: 75.000



NOTES:

1. DO NOT SCALE FROM THIS DRAWING.
2. DRAWING IS INDICATVE FOR PLANNING, AND NOT FOR CONSTRUCTION.
3. DRAWING IS INDICATIVE ONLY AND FEATURES SHOWN MAY VARY FROM FINAL DESIGN. ACTUAL DESIGN TO BE CONFIRMED AT DETAILED DESIGN STAGE. CONSTRUCTION TO BE COMPLETED IN ACCORDANCE WITH RELEVANT STANDARDS DEFINED IN DETAILED DESIGN.
4. EXISTING GROUND LEVELS BASED ON 5km DTM TERRAIN AND AS-BUILT DATA. EXISTING LEVELS TO BE CONFIRMED BY DETAILED TOPO SURVEY PRIOR TO CONSTRUCTION.

KEY

- CONTROL BUILDING
- BESS CONTAINER
- BESS INVERTER AND TRANSFORMER CONTAINER (PCS)
- PALLISADE FENCE
- FIRE WATER STORAGE TANK

Title:
INDICATIVE BESS PLATFORM EARTHWORKS

Project:
LIMEKILN BESS

Source:

Client:

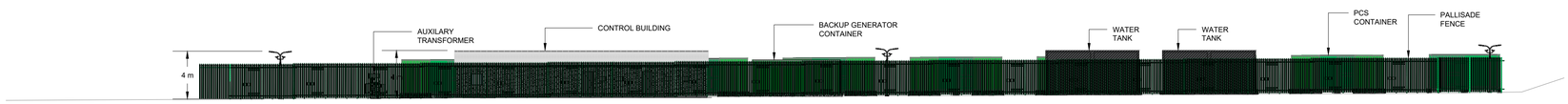
Drawn by:
SPD

Date:	Number:
JULY 2025	13

Scale:	Revision no:
1:500 @ A0	1

BORALEX

INDICATIVE BESS PLATFORM ELEVATIONS



A-A 1:250 @ A1

B-B 1:250 @ A1

C-C 1:250 @ A1

D-D 1:250 @ A1

0 m 50 m 100 m

NOTES:

1. THIS DRAWING IS INDICATIVE FOR PLANNING PURPOSES ONLY.
2. FINAL SELECTION OF EQUIPMENT SUBJECT TO DETAILED DESIGN POST CONTRACT LET.
3. REFER TO DRAWING NO. 4 *INDICATIVE BESS PLATFORM LAYOUT* FOR LOCATION OF ELEVATIONS

Title:
INDICATIVE BESS PLATFORM ELEVATIONS

Project:
LIMEKILN BESS

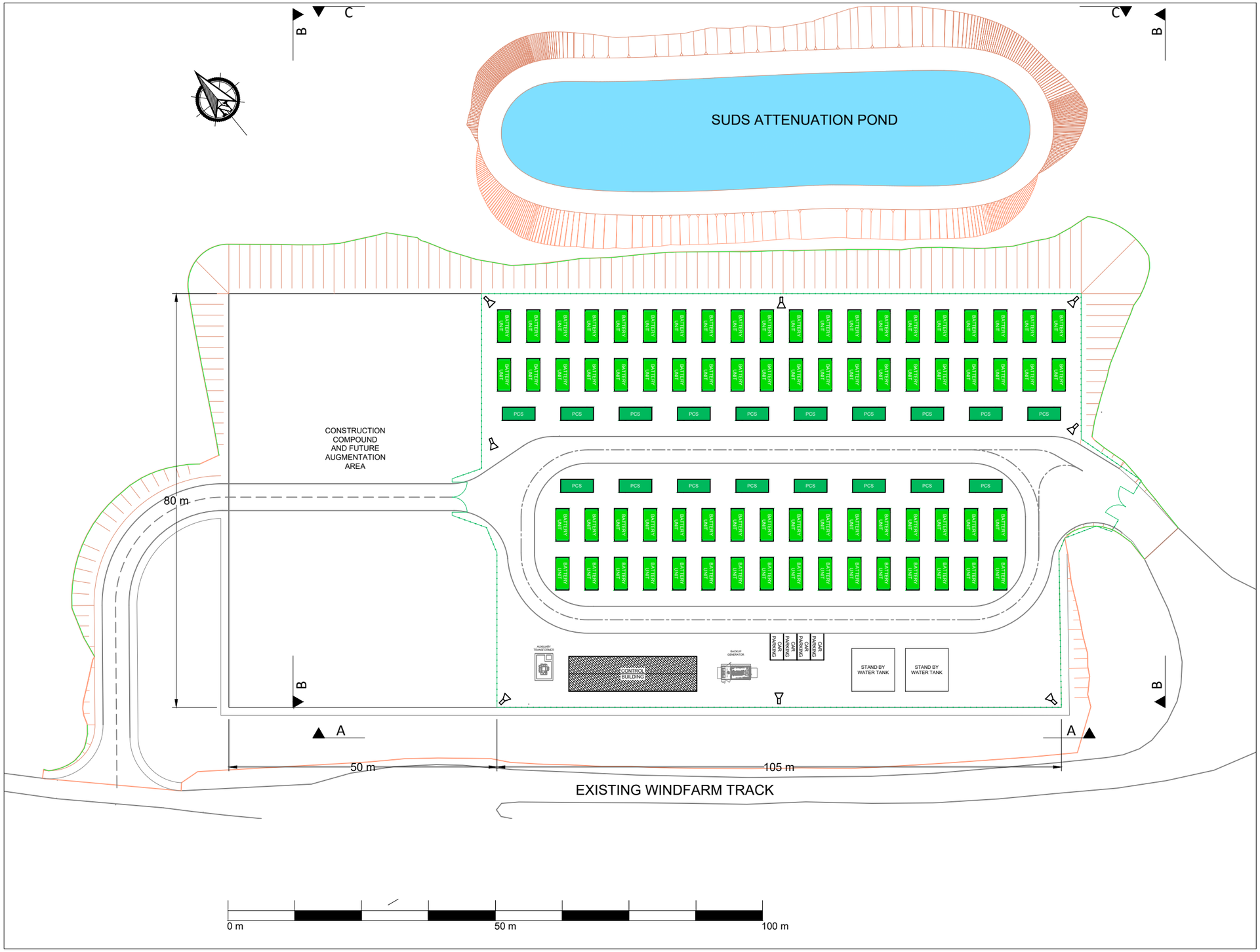
Source:

Client:

Drawn by:
SPD

Date:	**Number:**
JULY 2025	6
Scale:	**Revision no:**
1:250 @ A1	1

INDICATIVE BESS LAYOUT



NOTES:

1. THIS DRAWING IS INDICATIVE FOR PLANNING PURPOSES ONLY.
2. FINAL SELECTION OF EQUIPMENT SUBJECT TO DETAILED DESIGN POST PLANNING PERMISSION.

KEY:

1. BESS CONTAINER.
2. POWER CONVERSION SYSTEM (PCS).
3. SUDS ATTENUATION
4. PALLISADE FENCE
5. EARTHWORKS CUT
6. EARTHWORKS FILL
7. PROPOSED CCTV / LTG

Title:
INDICATIVE BESS PLATFORM LAYOUT

Project:
LIMEKILN BESS

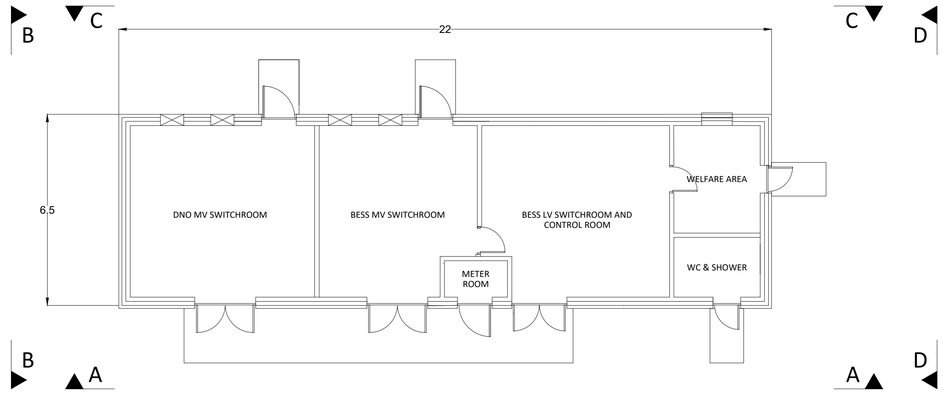
Source:

Client:

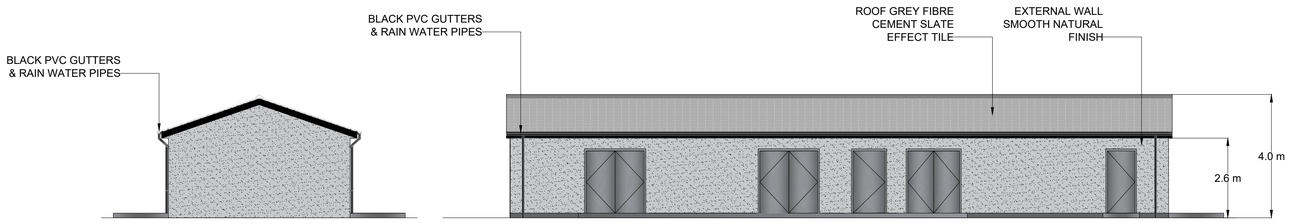
Drawn by:
SPD

Date:	Number:
JULY 2025	4
Scale:	**Revision no:**
1:750 @ A3	1

INDICATIVE CONTROL ROOM PLAN AND ELEVATIONS

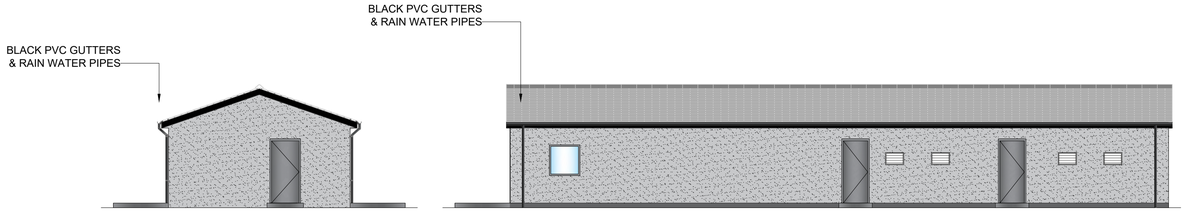


PLAN VIEW



B - B ELEVATION

A - A ELEVATION



D - D ELEVATION

C - C ELEVATION

NOTES:

1. THIS DRAWING IS INDICATIVE FOR PLANNING PURPOSES ONLY.
2. FINAL DIMENSIONS CONSTRUCTION METHOD, DETAILS AND FINISHINGS SUBJECT TO DETAILED DESIGN.

Title:
INDICATIVE CONTROL ROOM INTERNAL PLAN AND ELEVATIONS

Project:
LIMEKILN BESS

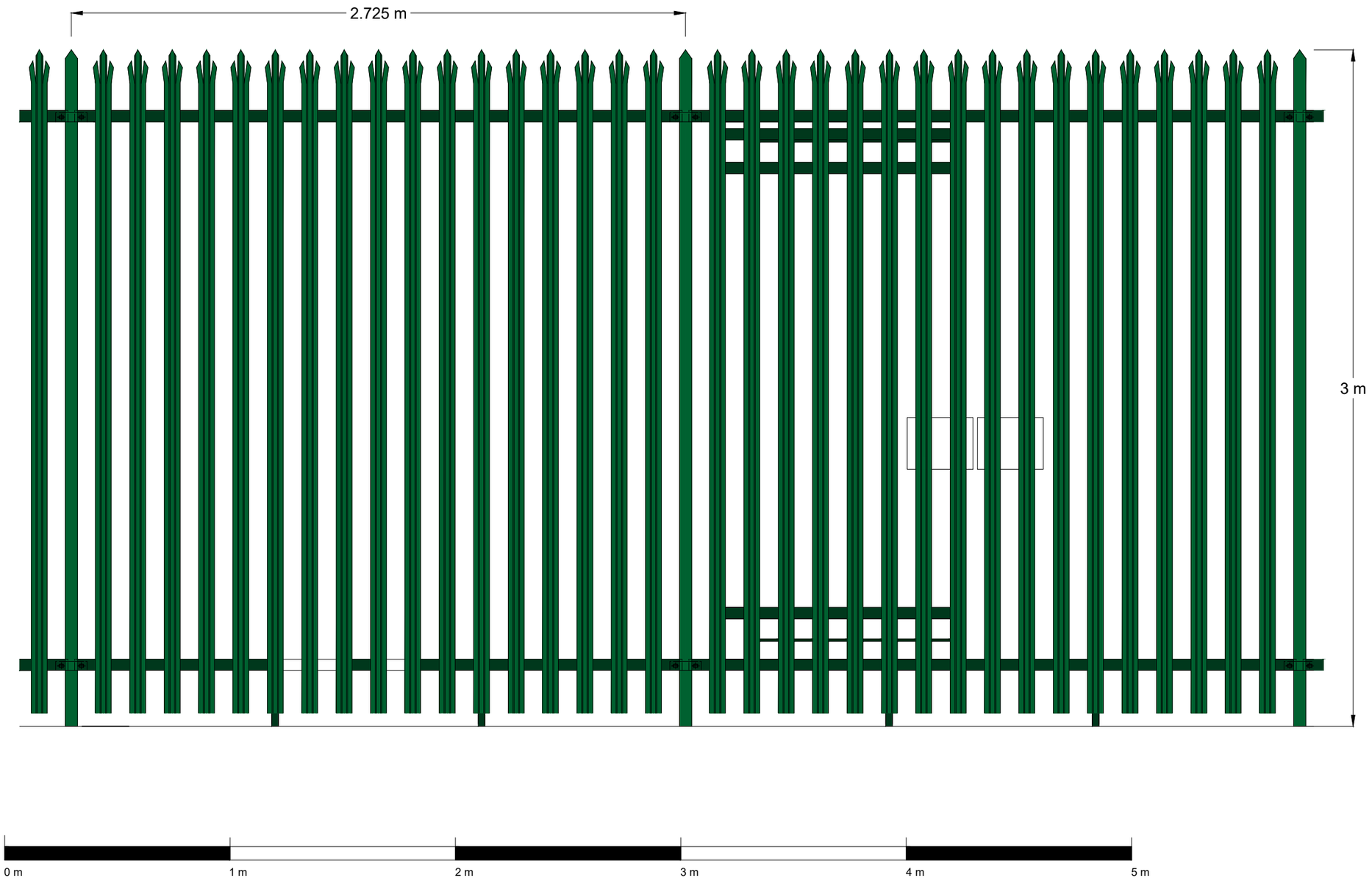
Source:

Client:

Drawn by:
SPD

Date:	**Number:**
JULY 2025	8
Scale:	**Revision no:**
1:100 @ A1	1

INDICATIVE FENCE DETAIL



NOTES:

1. THIS DRAWING IS INDICATIVE FOR PLANNING PURPOSES ONLY.
2. FINAL SELECTION OF EQUIPMENT SUBJECT TO DETAILED DESIGN POST PLANNING PERMISSION.
3. COLOUR IS INDICATIVE AND TBC DURING DETAILED DESIGN.

Title:
INDICATIVE FENCE DETAIL

Project:
LIMEKILN BESS

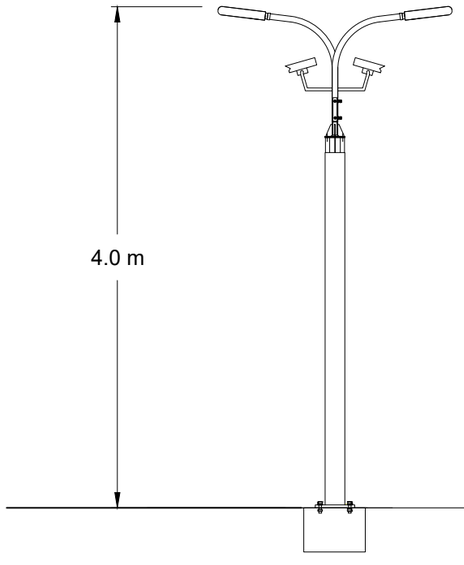
Source:

Client:

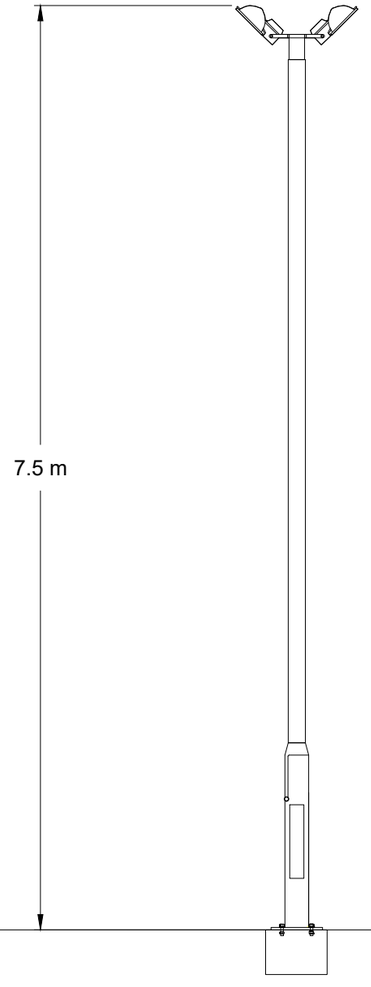
Drawn by:
SPD

Date:	**Number:**
JULY 2025	15
Scale:	**Revision no:**
1:20 @ A3	1

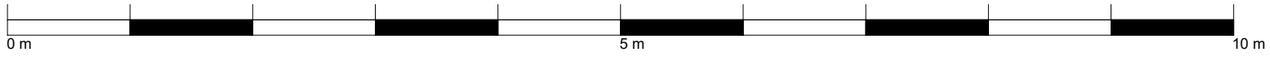
INDICATIVE LIGHTING AND CCTV COLUMN DETAILS



BESS AREA LIGHTING / CCTV COLUMN DETAIL



SUBSTATION EXTENSION COLUMN DETAIL



NOTES:

1. THIS DRAWING IS INDICATIVE FOR PLANNING PURPOSES ONLY.
2. FINAL SELECTION OF EQUIPMENT SUBJECT TO DETAILED DESIGN POST PLANNING PERMISSION.
3. 10 m HIGH LIGHTING COLUMNS IN SUBSTATION IDENTICAL TO THOSE ALREADY IN USE, TO BE USED FOR TASK LIGHTING ONLY AND NOT PERMANENT ILLUMINATION.
4. LIGHTING IN BESS AREA TO BE USED FOR SAFETY LIGHTING DURING MAINTENANCE AND FOR SECURITY LIGHTING WHEN SECURITY SYSTEM IS ARMED AND SHALL BE LOW LUX LEVEL GUIDANCE LIGHTING ONLY.
5. BESS AREA LIGHTING SHALL USE CCTV SYSTEM TO TRIGGER SECURITY LIGHTING TO LIMIT NUISANCE SWITCHING.

Title:
INDICATIVE LIGHTING AND CCTV COLUMN DETAILS

Project:
LIMEKILN BESS

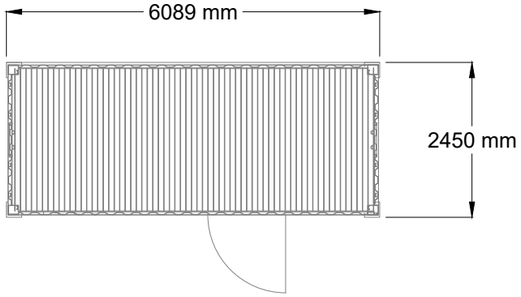
Source:

Client:

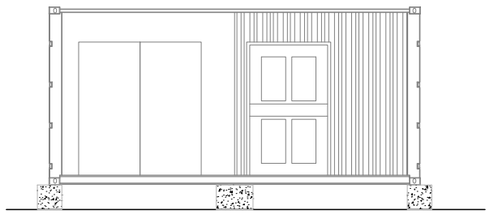
Drawn by:
SPD

Date:	Number:
JULY 2025	16
Scale:	**Revision no:**
1:50 @ A3	1

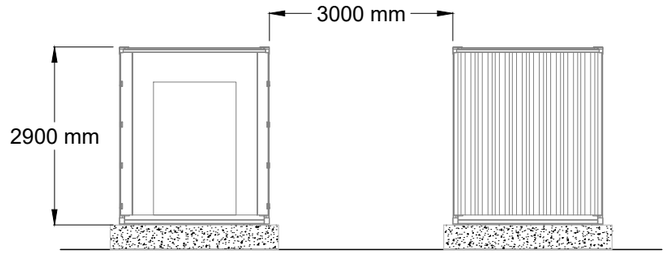
INDICATIVE POWER CONVERSION SYSTEM DETAILS



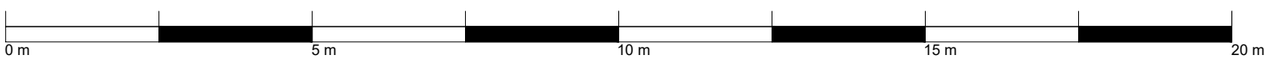
PCS CONTAINER PLAN
SCALE 1:100



PCS CONTAINER FRONT ELEVATION
SCALE 1:100



PCS CONTAINER END ELEVATIONS
SCALE 1:100



NOTES:

1. THIS DRAWING IS INDICATIVE FOR PLANNING PURPOSES ONLY.
2. FINAL SELECTION OF EQUIPMENT SUBJECT TO DETAILED DESIGN POST PLANNING PERMISSION.
3. POWER CONVERSION SYSTEMS (PCS) ARE USED TO CONNECT MULTIPLE BATTERY ENERGY STORAGE SYSTEM CONTAINERS STORING ENERGY AT LOW DC VOLTAGE AND CONVERT ENERGY TO MEDIUM AC VOLTAGE (33 kV). EACH PCS CONTAINS:
   - 3.1. 33 kV SWITCHGEAR
   - 3.2. 33 / 1 kV TRANSFORMER,
   - 3.3. LV AC SWITCHGEAR
   - 3.4. AC / DC INVERTER
   - 3.5. LV DC SWITCHGEAR.

Title: INDICATIVE POWER CONVERSION SYSTEM DETAILS

Project: LIMEKILN BESS

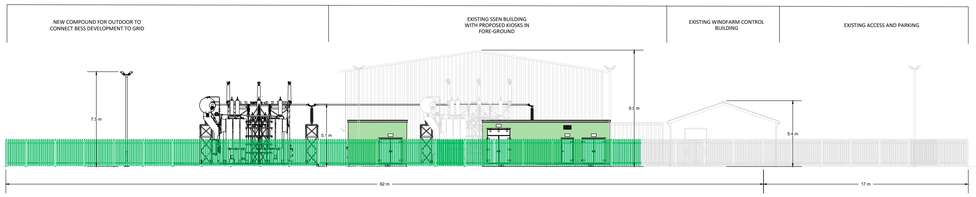
Source:

Client:

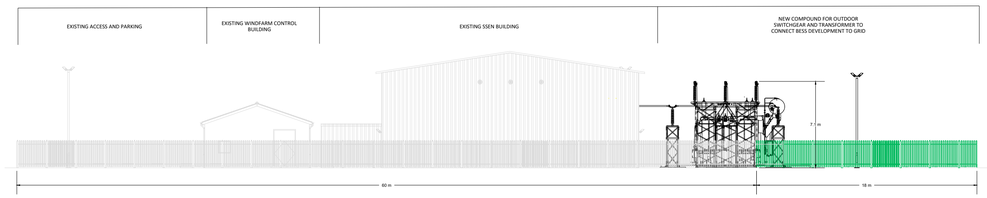
Drawn by: SPD

Date:	Number:
JULY 2025	9
Scale:	**Revision no:**
1:100 @ A3	1

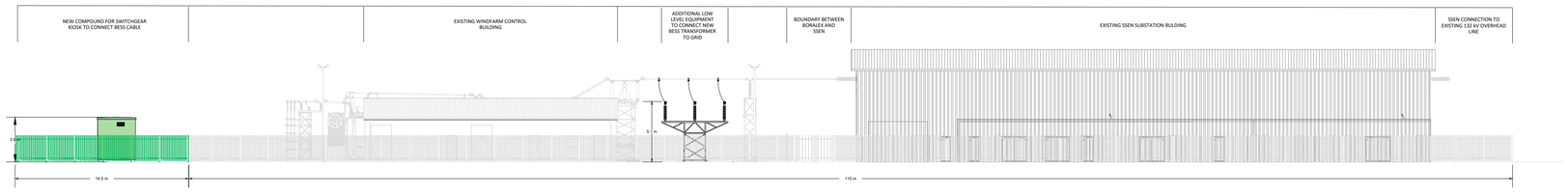
INDICATIVE SUBSTATION EXTENSION ELEVATIONS



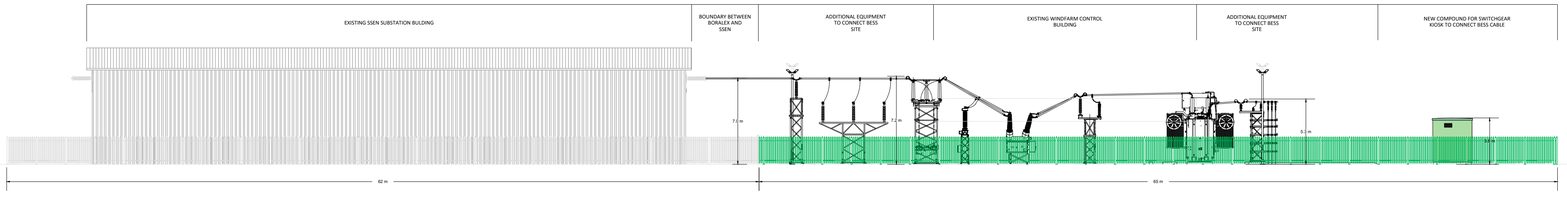
A-A 1:250 @ A1



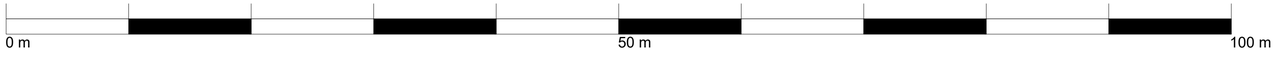
B-B 1:250 @ A1



C-C 1:250 @ A1



D-D 1:250 @ A1



KEY

1. EXISTING DEVELOPMENT
2. FUTURE DEVELOPMENT (KEYPLAN)
3. FUTURE DEVELOPMENT (ELEVATIONS)
4. KIOSK
5. NEW PALLISADE FENCE

NOTES:

1. THIS DRAWING IS INDICATIVE FOR PLANNING PURPOSES ONLY.
2. FINAL SELECTION OF EQUIPMENT SUBJECT TO DETAILED DESIGN POST CONTRACT LET.
3. REFER TO DRAWING NO. 5 *INDICATIVE SUBSTATION EXTENSION LAYOUT* FOR LOCATION OF ELEVATIONS

Title:
INDICATIVE SUBSTATION EXTENSION ELEVATIONS

Project:
LIMEKILN BESS

Source:

Client:

Drawn by:
SPD

Date:
JULY 2025

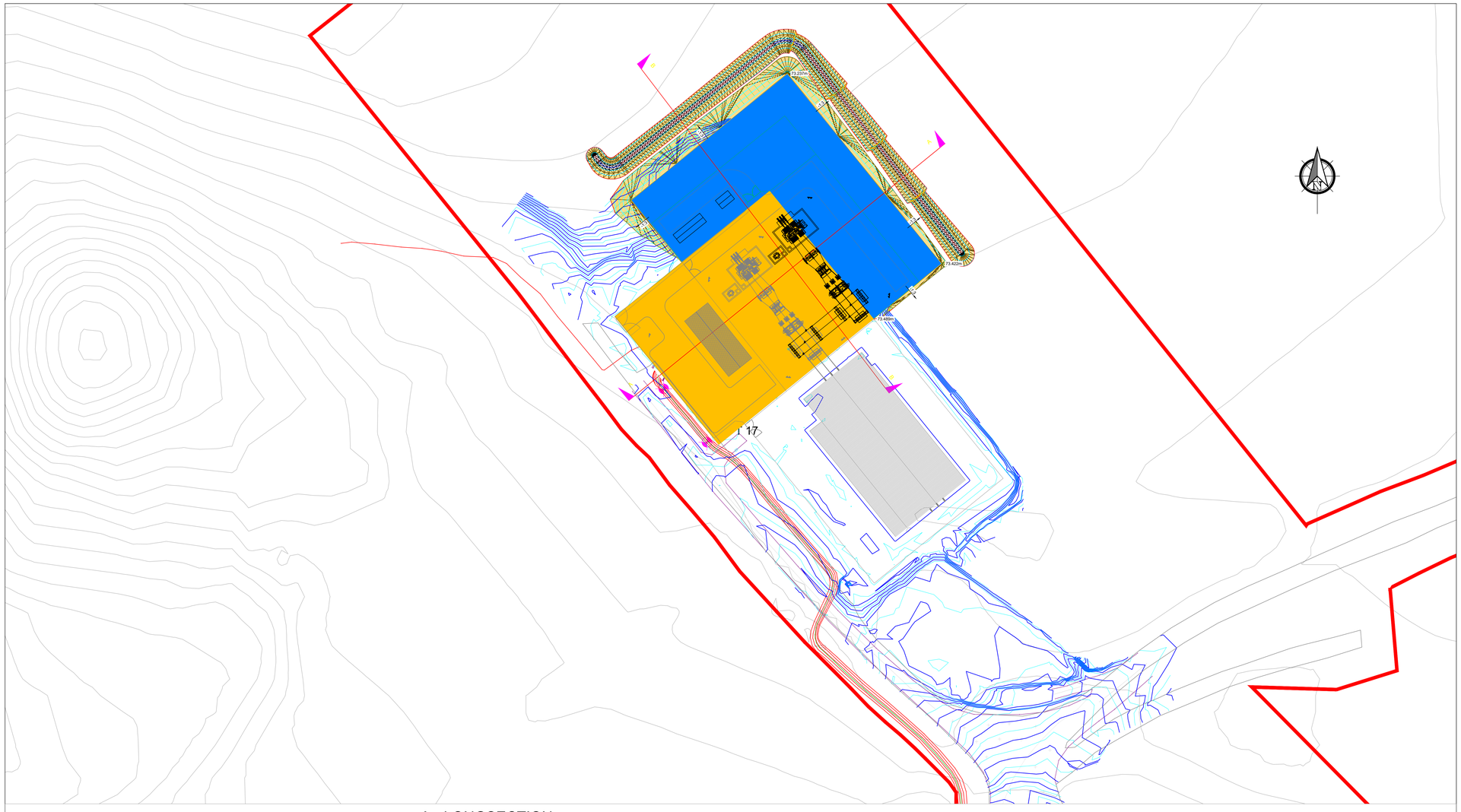
Number:
7

Scale:
1:250 @ A1

Revision no:
1

INDICATIVE SUBSTATION PLATFORM PLATFORM EARTHWORKS

BORALEX



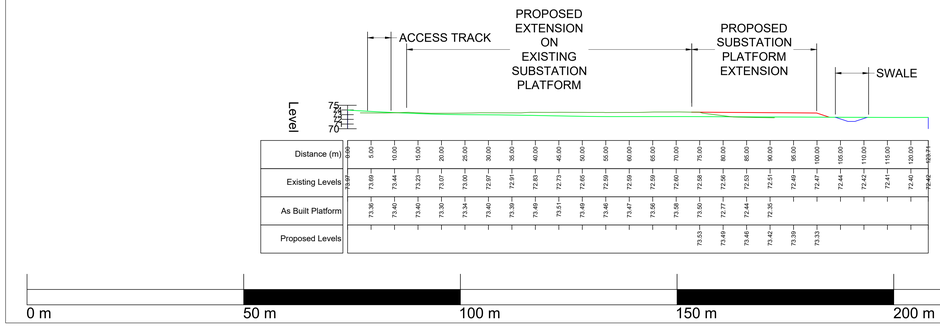
NOTES:

1. DO NOT SCALE FROM THIS DRAWING.
2. DRAWING IS INDICATVE FOR PLANNING, AND NOT FOR CONSTRUCTION.
3. DRAWING IS INDICATIVE ONLY AND FEATURES SHOWN MAY VARY FROM FINAL DESIGN. ACTUAL DESIGN TO BE CONFIRMED AT DETAILED DESIGN STAGE. CONSTRUCTION TO BE COMPLETED IN ACCORDANCE WITH RELEVANT STANDARDS DEFINED IN DETAILED DESIGN.
4. EXISTING GROUND LEVELS BASED ON 5km DTM TERRAIN AND AS-BUILT DATA. EXISTING LEVELS TO BE CONFIRMED BY DETAILED TOPO SURVEY PRIOR TO CONSTRUCTION.
5. REFER TO DRAWING NO. 5 AND NO. 7 FOR DETAILS OF SUBSTATION EXTENSION PLANS AND ELEVATIONS.

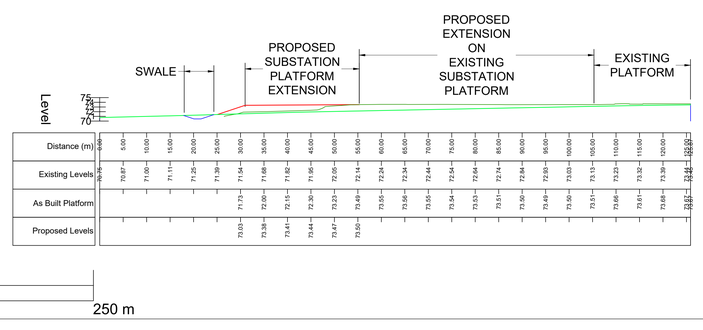
KEY

- SITE BOUNDARY.
- AREA OF EXISTING SUBSTATION PLATFORM.
- PROPOSED EXTENSION TO EXISTING SUBSTATION PLATFORM.
- PALLISADE FENCE.
- EXISTING ACCESS TRACK.

A - LONGSECTION
SCALE: H 1:500,V 1:500. DATUM: 70.000



B - LONGSECTION
SCALE: H 1:500,V 1:500. DATUM: 70.000



Title:
INDICATIVE SUBSTATION EXTENSION PLATFORM EARTHWORKS DRAWING

Project:
LIMEKILN BESS

Source:

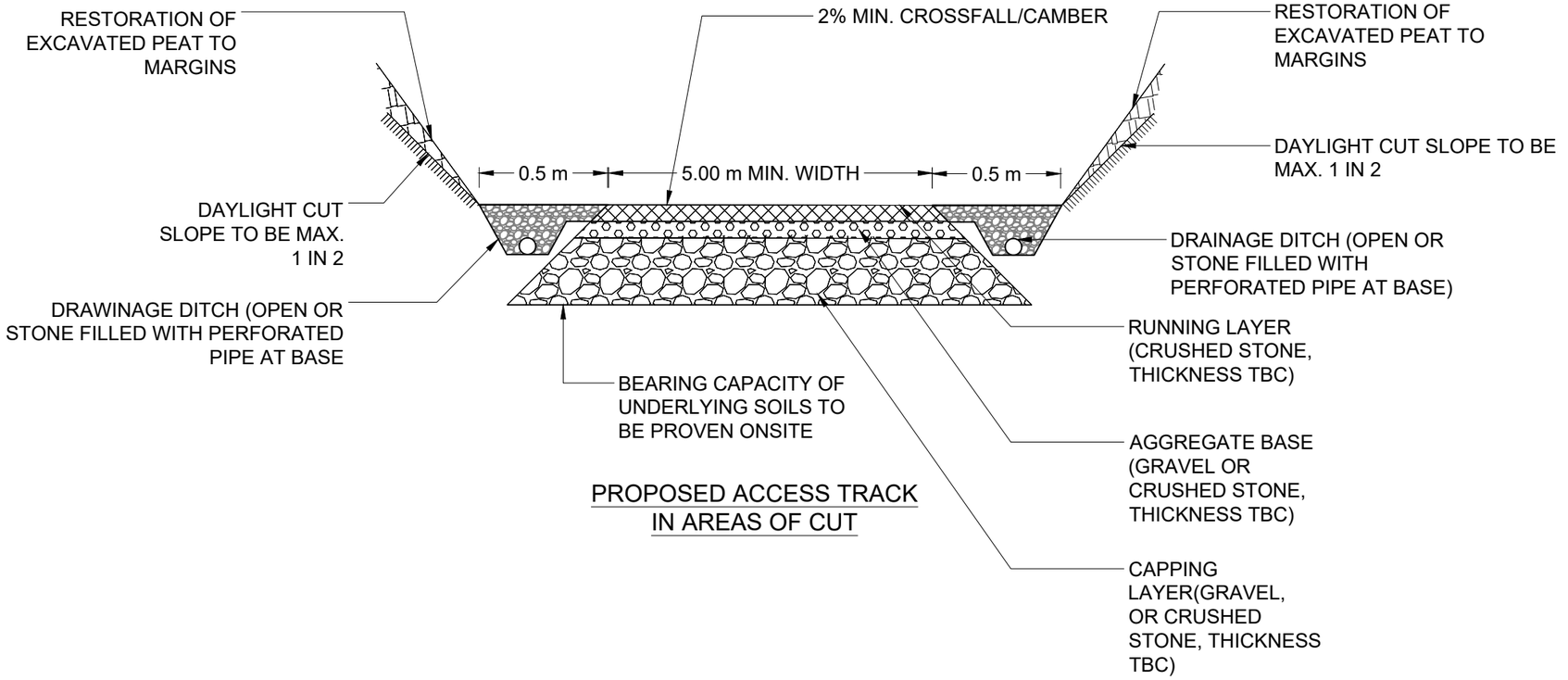
Client:

Drawn by:
SPD

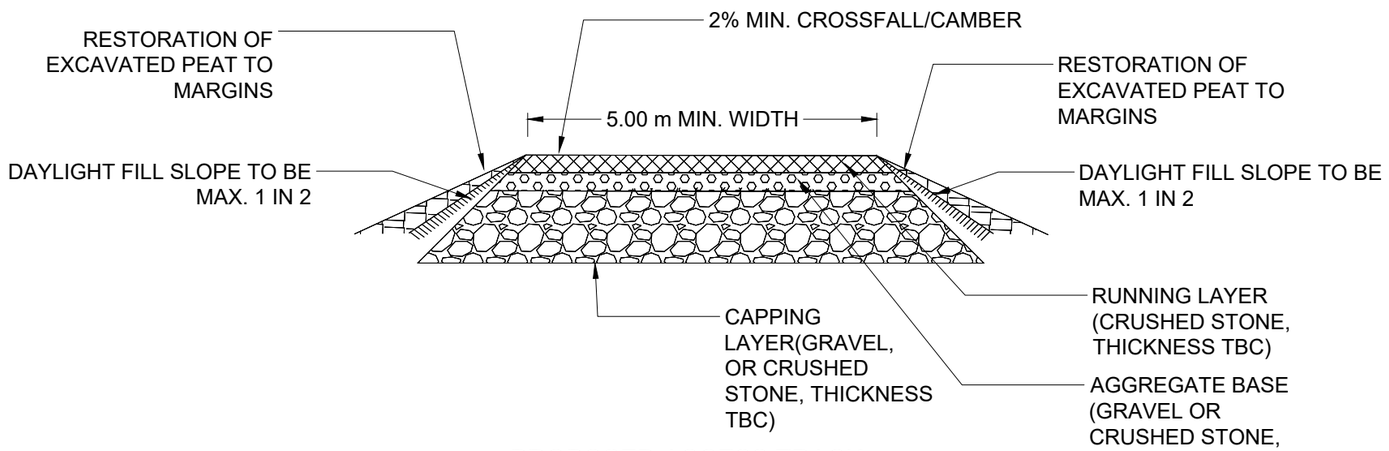
Date:	Number:
JULY 2025	14
Scale:	**Revision no:**
1:500 @ A0	1

BORALEX

PROPOSED ACCESS TRACK CROSS-SECTION DETAIL



PROPOSED ACCESS TRACK IN AREAS OF CUT



PROPOSED ACCESS TRACK IN AREAS OF FILL

NOTES:

1. ALL DIMENSIONS ARE IN METERS UNLESS OTHERWISE STATED.
2. THIS IS AN INDICATIVE ARRANGEMENT ONLY.
3. FINAL DIMENSIONS TO BE DETERMINED DURING DETAILED DESIGN.

Title: PROPOSED ACCESS TRACK CROSS-SECTION DETAIL

Project: LIMEKILN BESS

Source:

Client:

Drawn by: SPD

Date:	Number:
JULY 2025	11
Scale:	**Revision no:**
NTS	1

Site Plan (Detail)

N

962500 m

962000 m

297500 m

298000 m

298500 m

0 m 50 m 100 m 150 m 200 m 250 m 300 m

Boralex Ltd	
Project:	Limekiln BESS
Title:	Site Plan (Detail)
Scale:	1-3000 @ Sheet A3
Date:	July 2025

Key

- Existing Wind Farm Substation Area
- Indicative Attenuation Basin
- Indicative BESS Compound Area
- Indicative BESS Layout
- Section 36 Application Redline Boundary
- Core Path CA11.03
- Existing Wind Farm Access Track
- Indicative Substation Extension
- Indicative Underground Cable Route
- OS MasterMap

Site Plan

965000 m
964500 m
964000 m
963500 m
963000 m
962500 m
962000 m

295500 m
296000 m
296500 m
297000 m
297500 m
298000 m
298500 m
299000 m
299500 m
300000 m

N

0 m 250 m 500 m 750 m 1000 m

Key

- Existing Wind Farm Substation Area
- Indicative Attenuation Basin
- Indicative BESS Compound Area
- Indicative BESS Layout
- Section 36 Application Redline Boundary
- Core Path CA11.03
- Existing Wind Farm Access Track
- Indicative Substation Extension
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