Agenda Item	**6.2**
Report No	**PLS/29/26**

HIGHLAND COUNCIL

Committee: South Planning Applications Committee

Date: 13 May 2026

Report Title: 25/00503/S36: Field Beauly Limited

Land 465M SE of Dunballoch, Beauly

Report By: Area Planning Manager – South

Purpose/Executive Summary

Description: Beauly BESS - Construction and operation of a Battery Energy Storage System along with associated infrastructure and ancillary works, earthworks, access, drainage, landscaping and biodiversity enhancements.

Ward: 12 – Aird and Loch Ness

Development category: Section 36 Application

Reason referred to Committee: National Development

All relevant matters have been taken into account when appraising this application. It is considered that the proposal does not accord with the principles and policies contained within the Development Plan and is unacceptable in terms of applicable material considerations.

Recommendation

It is recommended that the Council **RAISE AN OBJECTION** to the proposal 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 construction and operation of a Battery Energy Storage Scheme (BESS) with an installed capacity of up to 100MW, access, landscaping and associated ancillary works. Due to the installed capacity over 50MW this proposal falls under the provisions of the Electricity Act and constitutes a national development.

1.2 Key elements of the development include:

BESS compound comprising:

- Battery storage units arranged into 44 rows or 'strings' of 18 units;
- 22 service 'skids' of power conversion systems (PCS) units and transformers shared between each two battery storage rows; and
- Ancillary infrastructure including cabinets, auxiliary transformers, underground ducting and cabling.

Substation compound comprising:

- Transmission Operator (TO) substation building housing welfare and office facilities and storage for the Transmission Operator;
- Developer substation building housing a control room, switch room, welfare, office and storage facilities for the Applicant;
- 132kV transformer; and
- Backup generator.

Elsewhere across the site:

- Earthworks to provide level platforms;
- Access arrangements including an access point from the public road, parking provision for 4 spaces and 5m wide internal access tracks;
- Palisade perimeter security fencing;
- Acoustic barrier fencing along the eastern and southern site boundaries;
- CCTV and lighting columns;
- Drainage infrastructure including attenuation and infiltration basins; and
- Landscaping and biodiversity mitigation / enhancement measures.

1.3 The proposed BESS would be to provide back-up electricity capacity to meet peaks in demand on the National Grid and used in response to calls for extra supply or absorb excess generation. Consequently, the equipment would not be in continuous use and may be called upon for a few minutes at a time, to several hours. BESS projects require to be located where they can be connected to the electricity network, at points which can provide the capacity for the required import and export of electricity. The BESS proposes to connect to the existing Beauly Substation located east across the River Beauly via a 2km long underground cable. Permission to extend the Beauly Substation was granted under planning application 21/04988/FUL and construction of the extension is currently underway. That infrastructure was

required to accommodate consented and projected renewable energy projects across Highland.

1.4 The applicant utilised the Highland Council's Major Pre-Application Service for the proposed development (24/01319/PREMAJ) with pre-application advice being provided in October 2024. Whilst the PREMAJ response noted the principle of development may be supported and that the site is capable of being relatively well screened, the potential noise impacts were noted as a potential key constraint, considering consented holiday accommodation to the south of the application site, permitted under permission in principle 20/01783/PIP and subsequent matters specified in conditions applications. Given there are numerous renewable projects in the wider surrounding area, it was noted that the future cumulative assessment would have to consider all other forms of major development being planned in the vicinity and consider what additional impacts would arise from the location of this development.

1.5 Whilst public consultation for Section 36 applications is not mandatory, a Proposal of Application Notice (PAN) was submitted on 14 June 2024 (24/02632/PAN) and reported to South Planning Applications Committee on 20 August 2024 for noting. The applicant undertook 2 public consultation events in Kirkhill then Beauly on 28 May 2024 and 21 August 2024 respectively. The PAC Report submitted with the application outlines the public engagement undertaken and sets out how matters raised at these consultation events have been responded to.

1.6 The applicant submitted an Environmental Impact Assessment (EIA) Screening Request (24/02885/SCRE) to the Energy Consents Unit (ECU) on 26 June 2024. In offering a screening opinion, it was then the view of the Council Officers that the proposed development did not constitute EIA development, a view that was also taken in the ECU's response of 3 December 2024. The applicant's EIA screening opinion request included only the BESS proposals and the definition of the project at this stage, did not include the 2km underground cable route connecting to the Beauly substation. The relevance of that omission to the assessment of the proposed application is addressed later in this report, in paragraphs 7.82-7.83.

1.7 Whilst the proposed development does not constitute EIA Development, the application is supported by a suite of supporting documents which include:

- Pre-Application Consultation Report;
- Planning Statement;
- Landscape and Visual Impact Assessment;
- Ecology and Biodiversity Enhancement Assessment;
- Protected Species Surveys;
- Tree Management Report;
- Land Capability for Agriculture Report;
- Archaeology Assessment;
- Flood Risk Assessment;
- Drainage Strategy;
- Noise Impact Assessment;
- Transport Statement;
- Outline Construction Traffic Management Plan; and

- Outline Battery Safety Management Plan.

1.8 Following submission of the application the applicant provided additional information consisting of an outline Construction Environmental Management Plan (CEMP), a River Beauly Protection Plan and Fire Water Management Plan, a response to soils and agricultural potential on site and an addendum to the original alternative site assessment, in September 2025. More recently, the Council issued a holding objection response to the ECU during October 2025, based on further information required to determine the ecological impacts and impacts on the agricultural land resource of the proposals.

1.9 In response, post submission of the application, the following variations to the proposed development have been made with additional information having been provided during January 2025:

- amended site and access layouts;
- landscaping plans with associated revised photomontages; and
- statement on community benefits and needs case.

2. SITE DESCRIPTION

2.1 The proposed development is located within an area of pasture farmland. The site is bordered to the east by mixed woodland, including plantation woodland and pockets of long-established woodland of plantation origin, listed on the Ancient Woodland Inventory, and directly to the south, by the River Beauly. The site boundary is assessed by the applicant as containing 13.71 ha of Class 2 and 0.89 ha of Class 3.1 agricultural land and therefore is all Prime Agricultural Land within the land capability classification for agriculture developed by Macaulay Land Use Research Institute (now the James Hutton Institute).

2.2 The wider red line application site measures 18.5ha and is located east of the extended Beauly Substation to which the BESS would connect. The site is accessed via an existing junction connecting to the A862 public road, serving farm buildings to the north. The wide red line boundary relates to the proposed corridor of the new Beauly to Peterhead 400 k overhead line, to which the Council raised an objection to the Scottish Government's Energy Consents Unit in December 2025, under reference 25/03986/S37.

2.3 The wider surrounding area is rural in nature with a small number of neighbouring residential properties scattered across the locale. The closest properties include:

- Fishing Lodge, immediately on the southern bank of the River Beauly 300m to the south; and
- Elmdubh, located across the A862 to the north, 1.6km distant.

Additionally, the application site shares a boundary with a development of holiday lodges, approved in principle under applications 20/01783/PIP and 24/02925/S42.

2.4 There are no natural or cultural heritage designations present within the site boundary. The closest listed building to the site is the Category B listed 'Dunballoch', 120m to the northwest of the site. The closest Scheduled Monument is Corff House, Fort, SM3195, some 1km west of the site boundary. The Inner Moray Firth Special

Protection Area (SPA) and RAMSAR, designated for inshore wintering waterfowl and wetland habitats is located 0.9km north, downstream on the River Beauly. The Beauly Firth Site of Special Scientific Interest (SSSI) protected for its coastal plants and estuarine habitats and bird species is co-located with the closest part of the Inner Moray Firth SPA and RAMSAR.

2.5 There are no landscape planning designations or other landscape constraints within the site or its immediate setting, or within the applicant's 4km radius Landscape and Visual Impact Assessment (LVIA) study area. Beaufort Castle Garden and Designed Landscape designation is located approximately 600m to the south of the site. The southern part of the wider application site, where the main development would be located, is within Landscape Character Type (LCT) 229 Enclosed Farmland. The northern part of the site, incorporating the vehicle access, is located within the Farmed River Plains LCT 342. Whilst the character of the locale is rural in nature, a dual overhead transmission line connecting westward to the Beauly Substation bisects the wider site and is prominent in views across it from the A862 to the north. The route of the proposed Beauly to Peterhead 400 kV overhead line (OHL), as considered by the Council under 25/03986/S37, also traverses across the site from west to east.

3. PLANNING HISTORY

On Site

3.1	20 Aug 2024	24/02632/PAN - Battery energy storage (up to 100MW)	PAN Reported to Committee
3.2	4 Sep 2024	24/02885/SCRE - Construction and operation of Battery Energy Storage System (BESS) exceeding 50MW comprising a compound of battery and electrical equipment, access track, landscaping and ancillary works	EIA Screening Response Issued
3.3	17 Dec 2025	25/03986/S37 - Beauly to Peterhead 400 kV OHL - Install, operate and keep installed 186km of new 400 kV overhead transmission line (OHL), supported on steel lattice tower structures, between proposed new substations at Fanellan (NH 48321 42717) in the area of Beauly, Greens (NJ 81960 47587) in the area of New Deer and Netherton (NK 05761 45576) in the area of Peterhead; associated crossing works, temporary diversions and permanent realignment to 14.7 km of existing 132 kV and 275 kV OHLs, and ancillary development and associated works.	Section 37 Electricity Act Raise Objection (to be reported to committee in June 2026)

Relevant Energy Related Development in Surrounding Area

3.4	25 Jul 2022	21/04988/FUL - Beauly Substation - Reinforcement and Extension of existing 132kV substation, including decommissioning and replacement of key equipment including provision of 3 new transformers with noise enclosures, associated platform extension and GIS building, access, landscaping and ancillary work - Land W Of Beauly Sub-station, Wester Balblair, Beauly	Planning Permission Granted
3.5	15 May 2025	24/01548/FUL - Erection and operation of battery energy storage system (BESS) up to 49.9MW, substations, switchgear and control buildings, landscaping, fencing and ancillary infrastructure - Land 340M SW Of Balblair Quarry, Balblair, Beauly	Planning Permission Granted
3.6	12 Jun 2025	23/03113/FUL - Construction and Operation of an energy storage facility with capacity of up to 49.9MW comprising up to 36 energy storage modules, control building, electrical equipment, access, landscaping, fencing - Land 410M SW Of Platchaig House, Kilmorack, Beauly	Planning Permission Granted on Appeal
3.7	02 Sep 2025	24/02831/FUL - Kilmorack Substation - construction and operation of a 132kV replacement substation, platform, plant and machinery, access, laydown/work compound area(s), drainage, landscaping, and other ancillary works - Land 100M NE Of Caulternich, Kilmorack, Beauly	Planning Permission Granted
3.8	02 Feb 2026	25/00826/FUL -Fanellan Substation - construction and operation of a 400 kV substation and converter station and associated infrastructure, site access, landscaping and demolition works - Land 300M NW Of Fanellan Farmhouse, Kiltarlity	Planning Permission Refused – Appeal to Scottish Government Pending Consideration
3.9	09 Feb 2026	25/04411/PAN - Proposed replacement of existing Black Bridge over the River Beauly together with temporary laydown / compound areas and other ancillary works - Black Bridge, Kilmorack, Beauly	PAN Reported to Committee

Other Development in the Surrounding Area

3.9	30 Aug 2021	20/01783/PIP - Visitor accommodation with associated landscaping, access, footpaths, parking and associated amenity buildings	Planning Permission in Principle Granted
3.10	15 Aug 2024	24/02925/S42 - Application under section 42 to develop land without compliance with (20/01783/PIP) condition 16 (woodland management plan)	Planning Permission Granted

4. PUBLIC PARTICIPATION

4.1 Advertised: Section 36 Application

Date advertised:

- Inverness Courrier – 7 and 14 February 2025
- The Herald – 7 February 2025
- Edinburgh Gazette – 5 February 2025

Representation Deadline: 16 March 2025

Representations Received by The Highland Council: 325 objections

Representations Received by The Energy Consents Unit: 404 objections

4.2 Material considerations raised in objections are summarised as follows:

- Not in accordance with the Development Plan;
- Inappropriate siting on greenfield and prime agricultural land;
- Landscape and visual impacts;
- Impact on natural heritage designations;
- Impact on habitats, species and ecology;
- Impacts on hydrology;
- Impact on cultural heritage designations and archaeology;
- Potential for light pollution;
- Impact on roads and road safety;
- Impacts on River Beauly fisheries;
- Cumulative impacts in association with other large scale electricity generation and transmission development in the area;
- Fire risk and associated impact on the surrounding environment;
- Noise;
- Health impacts and electromagnetic interference;
- Lack of consideration of alternative locations, proposals and design solutions;
- Lack of details regarding employment;
- Concerns over standard of public consultation events; and
- Economic impacts on tourism.

4.3 Non-Material considerations raised:

- Overprovision of renewable energy in Highland; and
- Lack of grid capacity.

4.4 All letters of representation are available for inspection via the Council's eplanning portal which can be accessed through the internet https://www.highland.gov.uk/planning/view-comment-planning-applications. Those representations received by the Scottish Government's Energy Consents Unit can be accessed via www.energyconsents.scot.

5. CONSULTATIONS

Consultations undertaken by The Highland Council

5.1 **Kiltarlity Community Council (Host) object** to the application. They raised concerns regarding the potential for environmental contamination from any leaks or spills from the site, fire hazards, difficulties in firefighting and the escape of fire suppression water as well as concern over the needs case for the proposals relative to Scotland's energy storage requirements.

5.2 **Beauly Community Council object** to the application. They raised concerns about fire hazards, the potential for runoff of contaminants into the River Beauly and the cumulative transport impacts of this development along with others in the area, on the local road network.

5.3 **Kilmorack Community Council object** to the application. They raised concerns regarding the siting of the proposal and consideration of alternative sites in addition to concerns related to the potential landscape and visual impacts, the potential for fire and for the escape of fire suppression water, impacts on protected species, loss of agricultural land, noise levels and the cumulative impacts of the proposals in association with others in the surrounding area.

5.4 **Kirkhill and Bunchrew Community Council object** to the application. They raised concerns regarding the potential for environmental contamination from any leaks or spills from the site, fire hazards, difficulties in firefighting and the escape of fire suppression water as well as concern over the needs case for the proposals relative to Scotland's energy storage requirements.

5.5 **Access Officer** does not object to the application, subject to a detailed outdoor access plan secured via condition. The Access Officer noted that both construction and operational traffic would cross the cycleway on the south side of the A862 at the access junction point. Otherwise, there is little evidence of the use of public access rights across the site.

5.6 **Contaminated Land** do not object to the application. From the information provided as part of the application, the proposed development would not appear to materially change the risk of potential contamination, and a contaminated land condition which requires further investigation is not recommended.

5.7 **Development Plans Team** provided comments on the application. The principle of battery storage facilities (particularly of a national scale) cannot be disputed under the terms of NPF4 but the site-specifics can. Policy 11e) of NPF4 sets out the criteria

for assessing these site specifics. These criteria require assessment of each proposal's impact and whether that impact is localised and can be mitigated. In this respect, the applicant is considered to not have explained the proposal's site selection process and, in particular, why other more suitable (in planning terms) sites have been discounted. The need for relatively close proximity to the excess power source (understood to be the Wester Balblair substations) is accepted but the most obvious alternative, the Wester Balblair quarry, (Site O in the applicant's appraisal) which is in a degraded "industrial" use and has very good landscape and visual screening, is not discounted.

5.8 **Ecology Team** do not object to the application, subject to the submission of a Habitat Management Plan, Construction Environmental Management Plan, Environmental Clerk of Works, pre-construction surveys, surveys of nesting birds prior to construction and GIS shapefile data. An Informative is also required stating that works should stop immediately should protected species or nesting / breeding / resting up sites be found.

5.9 **Environmental Heath** do not object to the application, following the submission of additional information and subject to conditions requiring controls on operational noise and an updated Noise Impact Assessment. The proposed development is set in a predominantly rural area and there is potential for disturbance to sensitive premises from noise unless appropriate mitigation measures are implemented.

5.10 **Flood Risk Management Team** do not object to the application, subject to a condition controlling the final surface water drainage design.

5.11 **Forestry Officer** does not object to the application subject to conditions requiring the submission of a finalised Tree Protection Plan and Arboricultural Method Statement (AMS) overseen by a suitably qualified Arboricultural Consultant and Landscaping Consultant.

5.12 **Historic Environment Team - Conservation** do not object to the application. There is no anticipation of significant adverse impacts on the setting of the closest Listed Buildings to the proposal.

5.13 **Historic Environment Team - Archaeology** do not object to the application, subject to a condition requiring the submission of a detailed Written Scheme of Investigation.

5.14 **Landscape Officer** does not object to the application. The Landscape and Visual Appraisal (LVA) Report generally accords with the Guidelines for Landscape and Visual Impact Assessment, Third Edition. The proposed development has been appropriately sited and designed, and much thought has gone into the proposed landscape mitigation which would reduce longer term effects and respect the overall character of the existing landscape. The cumulative influence of the proposed development would also be restricted by the extent of surrounding woodland and tree cover to the east, south and west of the site.

5.15 **Transport Planning Team** does not object to the application, following the submission of further clarification of access measures form the applicant. Concerns were raised in regard to the intensification of the use of the existing access through the farm buildings to the north of the site for operational needs and it is

recommended that the applicant consider retaining the proposed temporary construction access for operational needs. A finalised Construction Traffic Management Plan (CTMP) is recommended to be secured via condition. The applicant is recommended to continue to engage with the Council's Structures Team on the need for specific assessment of the impacts of abnormal loads on the Lovatt Bridge, to the west of the site.

Consultations Undertaken by the Energy Consents Unit

5.16 **Beauly Fishery Board object** to the application due to the potential for contamination of the river with fire suppression water runoff. The River Beauly, which borders the south-west side of the site is home to the IUCN red listed Atlantic salmon, along with numerous other protected and valued species. The Fisheries Board raised concerns regarding the capacity of the fire water runoff detention ditch until advice from the Scottish Fire and Rescue Service is available following the conclusion of their current working groups on BESS safety. A hydrological assessment of the River Beauly is also requested, to determine if there would be any significant ecological impacts from emergency fire water abstraction. A 50m buffer zone is recommended between the development and the riverbank to avoid potential pollution issues in a fire event.

5.17 **British Telecom** do not object to the application. The application should not cause interference to BT's current and planned radio network.

5.18 **Health and Safety Executive** do not object to the application, confirming the site is not within any explosive safeguarding zones or other HSE consultation zones.

5.19 **Historic Environment Scotland** do not object to the application but note that the proposals lie in close proximity to three probable Iron Age scheduled hill forts sited along the River Beauly; Corff House Fort (SM3195), Dun Mor Fort (SM2423) and Phonineas Hill Enclosure (SM4729). The BESS and associated infrastructure would introduce a modern development in views from the scheduled monuments over the lower land and the river. They would also appear in views from the forts on the east side of the river towards Corff House Fort on the west bank of River Beauly. HES is however, content that the impact on the setting is not of a magnitude to raise issues of national interest.

5.20 **MOD (The Defence Infrastructure Organisation)** do not object to the application, which does not fall within any of their safeguarded areas.

5.21 **National Air Traffic Control Services** do not object to the application. The proposed development does not conflict with their safeguarding criteria.

5.22 **NatureScot** do not object to the application. The project could affect a number of designated European sites in the surrounding area. The proposal is hydrologically connected to Inner Moray Firth SPA and Moray Firth Special Protection Area (SPA) and it is considered the proposed development has the potential to have a detrimental impact on the designation, unless mitigation measures are followed. NatureScot consider the proposed development will not adversely affect the integrity of the SPAs if the applicant develops the Construction Environmental Management Plan (CEMP) to include a comprehensive emergency response plan for surface

water run-off to ensure contamination does not enter a water course during an extreme event. Provided this, and pre-construction surveys and a Species Protection Plans for Osprey along with dedicated ornithological monitoring are delivered, NatureScot consider the risk to the integrity of the SPA's would be mitigated.

The proposal is also hydrologically connected to the Moray Firth Special Area of Conservation (SAC) via the Beauly River, protected for subtidal sandbanks and bottlenose dolphin. NatureScot consider the proposed development will not adversely affect the integrity of the SAC if the applicant develops the Construction Environmental Management Plan (CEMP) to include a comprehensive emergency response plan for surface water run-off to ensure contamination does not enter a water course during an extreme event.

NatureScot also commented on fire risk in a separate response. A fire at the development site has the potential to damage qualifying features of Inner Moray Firth SPA, Moray Firth SPA and Moray Firth SAC because of firefighting procedures. NatureScot considers that, provided the applicant develops a full CEMP which includes a comprehensive emergency response plan, and details how fire water will be dealt with and disposed of, avoiding potential contamination entering a water course, the integrity of these designations will not be adversely affected.

5.23 **Office for Nuclear Regulation** do not object to the application, confirming the site is not within a consultation zone for nuclear sites.

5.24 **Scottish Environment Protection Agency (SEPA)** do not object to the application, noting their standing advice for such developments. Following further discussions with Council Officers SEPA provided clarification on the relationship of the proposal to the River Beauly. In this respect, the development is in close proximity to SEPA's riparian buffer for larger rivers such as the Beauly. SEPA confirms that the stretch of the river adjacent the site has not been identified as an area of specific risk of erosion.

5.25 **Scottish Fire and Rescue Service (SFRS)** do not object to the application. A standard response was provided, noting that SFRS are assessing all BESS site applications and a working group is established to provide unified responses to all applications. Until this group completes its work, National Fire Chiefs Council Best Practice guidance on BESS should be followed.

5.26 **Scottish Forestry** do not object to the application due to the low impact on trees and woodland.

5.27 **Scotland Gas Networks** do not object to the application, confirming there are no high-pressure assets within the area.

5.28 **Scottish and Southern Electricity Networks (SSEN)** do not object to the application. Having reviewed the layout and siting of the development, SSEN are content that the proposal would not pose any operational concerns for the existing Beauly-Knocknagael 132kV and Beauly - Knocknagael 275kV overhead transmission lines running through the site, or pose any operational risk to the proposed Peterhead - Beauly 400kV overhead line.

5.29 **Scottish Water** do not object to the application. A review of their records indicates that the proposed development does not fall within a drinking water catchment where a Scottish Water abstraction is located.

5.30 **Transport Scotland** do not object to the application, subject to conditions to secure: the proposed route for any abnormal loads on the trunk road network; accommodation measures for abnormal loads including the removal of street furniture, junction widening and traffic management; and any additional signing or temporary traffic control measures deemed necessary due to the size or length of any loads being transported must be undertaken by a recognised QA traffic management consultant. Additionally, Transport Scotland included a number of advisory notes setting out requirements relating to works within the trunk road network.

6. DEVELOPMENT PLAN POLICY AND OTHER MATERIAL POLICY CONSIDERATIONS

6.1 Appendix 2 of this report provides details of the documents which 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 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 Section 36 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 / 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) Protected Species;
h) Built Heritage;
i) Amenity;
j) Health and Safety;
k) Traffic and Transport;
l) Flood Risk and Drainage;
m) Decommissioning and Reinstatement; and,
n) 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 adopted Inner Moray Firth Local Development Plan 2 (IMFLDP2), and all statutorily adopted supplementary guidance.

7.6 NPF4 outlines that Scotland is facing unprecedented challenges and that we need to reduce greenhouse gas emissions and embrace and deliver radical change so we can tackle and adapt to climate change, restore biodiversity loss, improve health and wellbeing and build a wellbeing economy while striving to create great places. Therefore, NPF4 sets out that choices need to be made about how we can make sustainable use of our natural assets in a way that benefits communities.

7.7 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 deliver on other policy considerations. These are assessed in the following sections of this report, which set out that the proposal is generally in conformity with the provisions of the development plan.

Energy and Carbon Saving

7.8 The Council continues to respond positively to the Scottish Government's renewable energy agenda. Whilst there has been a focus on onshore wind energy in Highland

for the last generation, large scale pumped hydro storage schemes are becoming a viable complementary renewable energy source alongside on and offshore wind energy. The Highland region offers significant opportunities for BESS given onshore wind energy developments in Highland accounts for around 30% of the national installed onshore wind energy capacity along with pumped hydro storage under construction and other renewable energy sources further diversifying the mix of renewable energy to be fed into the electricity grid.

7.9 The proposal would be interconnected to the grid's transmission / distribution network via an underground cable connection to the existing Beauly Substation. The development would 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 development 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 the proposal is considered to "regenerate" renewable energy.

7.10 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.

7.11 Notwithstanding any impacts that this proposal may have upon the landscape resource, amenity and heritage of the area, the development is considered compatible with Scottish Government policy and guidance, making a substantial contribution to meeting the Government, UK and European energy targets, with the development having the potential to store / release renewable energy with an installed capacity of up to 100MW.

Socio-Economic Impacts

7.12 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 has worked with public, private, and community partners to develop its priorities through the Highland Outcome Improvement Plan 2024-2027. This Plan has a vision to maximise opportunities and tackle inequality to build a thriving Highlands for all and includes three high level strategic priorities around people, place and prosperity. A Community Wealth Building Strategy was approved in September 2024. It provides an alternative approach to economic development and a practical response that aims to keep wealth within a local area. It aims to ensure every area and community can participate in, and benefit from, economic activity. The ongoing Local Place Plans initiative will likely identify other local opportunities too. The Council's position on Community Benefits has more recently been updated with the approval of a

"Social Values Charter for Renewables Investment" (June 2024). The charter sets out The Highland 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.

7.13 The Council's Social Value Charter Statement would expect this development to:

- Maximise local economic impact and employment;
- Prioritise local employment and supply chain opportunities along with promoting environmental stewardship;
- Support the community through flexible contributions to a community and a strategic fund;
- Provide grid resilience and environmental benefits; and
- Provide training and skill development. These commitments would align with the Council's Social Values Charter by contributing to the emerging Community Wealth Building Strategy and would also ensure that the proposal results in long-lasting socio-economic benefits for the local community. The Community Wealth Building Team are aware of the application and have approached the developer separately to discuss how the development can deliver in respect of social values.

7.14 The proposed development anticipates a construction period of up to 2 years with an expected operational lifespan of 40 years. There are likely to be adverse effects caused by construction traffic and disruption, particularly during the construction phase when abnormal loads are being delivered to site. Such projects can offer investment and opportunities to the local, Highland, and Scottish economy, including businesses ranging across the construction, haulage, electrical and service sectors.

7.15 Following further discussions with the Council Officers, the applicant has provided a breakdown of the direct, indirect and induced economic impacts they consider will result from the proposals. The applicant estimates that during construction, the proposals will result in a capital expenditure (Capex) of £3.5 million in Highland and £10 million in Scotland over a period of two years. It will create new temporary construction jobs, amounting to an estimated 45 years of employment in Highland and 110 years in Scotland. Whilst operational employment is minimal for BESS the application expects expenditure to be worth £900,000 in Scotland inclusive of £400,000 in Highland, with 20 jobs associated with this development, half of which will be in Highland.

7.16 Following further discussion with the applicant they have confirmed they will support the delivery of local services through a community benefit annual payment of £100,000 (£1,000 per MW) during the estimated 40-year lifespan of the BESS, equivalent to £4 million over the course of its operation. Additionally, a schools-based education programme is offered for pathways into the renewable energy sector.

7.17 Owing to the nature of community benefit, which is voluntary in nature, it is not deemed a material planning consideration and is separate to the planning process that will be progressed by Highland Council's Community Wealth Building Team who liaise directly with applicants on this matter. Whilst not material, the details are already in the public domain following the applicant submitting a letter to Highland Council on 2 January 2026 outlining the community benefits and needs case of the proposed development.

7.18 Should the Scottish Minsters approve the development, a condition may be attached to secure a Local Employment Scheme to maximise socio-economic benefits for construction contractors as well as specialists for site landscaping / habitat management. Compliance with NPF4 Policies 11 and 25 is therefore capable of being demonstrated, as they relate to maximising socio-economic benefits and building community wealth.

7.19 The proposed development anticipates a construction period of approximately 2 years and with proper maintenance the BESS can remain operational indefinitely. There are likely to be adverse effects caused by construction traffic and disruption, particularly during the construction phase when abnormal loads are being delivered to site. Such projects can offer investment and opportunities to the local, Highland, and Scottish economy, including businesses ranging across the construction, haulage, electrical and service sectors.

7.20 Highland is experiencing significant construction activity of renewable energy development and the associated electricity transmission infrastructure required to connect to the electricity grid. The approval of the proposed development would have some positive economic impact, particularly during the construction period, although this would thereafter curtail at operational stage. Representations have raised the economic impact that renewable related energy development may have on tourism more generally. These adverse impacts are most likely to be most acute during construction, which is temporary in nature, and could otherwise be managed through environmental mitigation measures as specified elsewhere in this report and may be secured by condition.

7.21 NPF4 Policy 11 c) offers support to schemes where community socio-economic benefits are maximised, with NPF4 Policy 25 enabling support to be given to schemes which contribute towards a local or regional wealth building strategy or have an element of community ownership. With no community ownership being proposed, the proposal cannot be given any additional support under NPF4 Policy 25. A condition could however be imposed to require a Local Employment Scheme, should the Scottish Minsters approve the development.

Siting and Design

7.22 The location was identified following confirmation that a point of connection to the electricity grid at the existing, extended, Beauly substation was available, with the substation having the ability to accommodate the required import and export of electricity. Specific site selection was informed by a number of key factors including connectivity to the grid, land availability, lack of environmental constraints, limited visual impact and suitable access requirements.

7.23 The applicant has sought to avoid a location which would be visually dominant within the rural landscape from surrounding receptors. However, this must be balanced with their desire to maximise electrical efficiency as far as possible and the siting in proximity to the existing Beauly substation.

7.24 The proposed development benefits from being sited in a relatively sparsely populated location approximately 300m from the nearest residential properties and is not located within any natural or landscape designations. The location also benefits the site in terms of distant views towards it from the surrounding area with landform and vegetation offering varying levels of screening of the site from longer range views.

7.25 A relatively utilitarian design is proposed with equipment being of a functional appearance as dictated by operational and / or health and safety requirements. This site will comprise a 3-zone arrangement, from west to east, accommodating 2 rows of batteries and a separate substation compound. These are linked via an internal access track that connects to the A862 public road at a remote point to the north, via a junction serving existing farm buildings.

7.26 The 2 battery compounds are located in the western portion of the site which will accommodate individual battery units which comprise of metal cabinets enclosing lithium-ion batteries and associated equipment. The maximum dimensions of each battery unit would be 1.3m by 1.4m with a height of 2.9m. These will be enclosed within 44 ‘strings’ or modules of 18 batteries, similar to shipping containers measuring 13.9m long by 3.25m wide by 2.9m high, situated above ground. Each of these rows is serviced by a medium voltage (MV) skid housing associated equipment to allow charging from and discharging to the grid network. The maximum dimensions of the MV skids would be 12.2m long by 2.4m wide with a height of 3.6m.

7.27 Whilst the exact number of individual battery storage containers and associated MV skids will depend upon the battery technology that is available at the time of construction, the specification as proposed on the site layout shows up to 792 battery units contained within 44 battery modules, similar to shipping containers, and 22 MV skids.

7.28 Due to the site's generally level topography, the requirements for earthworks are limited to establishing a levelled and stoned platform and screening earth mounds, up to 1m in height.

7.29 The substation compound is located in the eastern portion of the site and accommodates electrical infrastructure including transformers, air-insulated switchgear and associated infrastructure, a high voltage switch room, control room and welfare facilities for use during maintenance events. Two substation buildings are proposed for the site operator and transmission operator (TO) measuring respectively, 29.9m by 15m with a height to the pitched roof ridge of 4.8m and 15.75m by 11.2m with a height of 4.3m This equipment enables the import and export of electricity from the Beauly Substation.

7.30 The Planning Statement submitted in support of the application notes that BESS technology is developing rapidly. Whilst the fundamental components are well

established the exact specifications can vary between projects and technology providers. The dimensions noted represent current design, however, as with other renewable technology, further refinements may occur as the detailed design progresses and technology evolves. Should the Scottish Minsters approve the development, the finalised design and specification of BESS infrastructure may be controlled by condition. The final cable route would be determined following detailed design in consultation with SSEN.

Landscape and Visual Impact

7.31 Large scale energy schemes would be expected to result in some significant landscape and visual impact effects; however, such effects do not automatically translate to unacceptable effects. This is a matter of planning judgement when considering the merits of any given scheme. The applicant's assessment of effects on visual amenity has considered potential effects on visual receptors (people obtaining views) from surrounding properties, on routes (both roads and recreational) and taking advantage of the views at outdoor locations. The applicant has submitted a Landscape and Visual Impact Assessment (LVIA) which evaluates landscape and visual effects that would result from the proposed development. Visual effects are assessed from a series of 5 viewpoints, selected to represent a range of views people experience within the study area.

7.32 During construction the applicant considers notable landscape character effects will be limited to areas within relatively close proximity of the site. Construction stage effects will be short term and temporary. Local effects during peak construction stages are predicted to incur a moderate adverse effect upon both the Enclosed Farmland and Farmed River Plains LCT. This is agreed.

7.33 Once operational the applicant considers there will be no significant effect upon night-time character of the landscape. Proposed external lighting will not be used during normal operations and would be activated by motion sensors in situations requiring emergency access or overnight maintenance. When the site is illuminated however, it will be seen in a context of the minimal existing lighting, given the rural surroundings.

7.34 Construction effects will be shorter term and temporary. Initially, the proposed development would represent an expansion of energy infrastructure in views of the site, albeit a low lying one, viewed behind existing taller infrastructure represented by the overhead transmission line in the foreground and back clothed by woodland. Once operational, earthworks around the site, along with the retention of vegetation (including trees and the surrounding plantations and natural woodland), will provide screening to the compounds and taller infrastructure within. Longer term, after 10 years, the establishment of belts of woodland planting as proposed directly to the north, west and south of the BESS will act to substantially screen these structures longer term once vegetation has become embedded within the landscape. Planting will also help reinforce local landscape character. Local visual character will be altered, with certain existing views foreshortened or partially screened, although those changes are not considered to be detrimental. Overall, however, the proposed development will incur a minor significance of effect on the surrounding LCT's. This is agreed.

7.35 In relation to visual amenity, the orientation and layout of the site as well as intervening tree screening would serve to limit view from residential properties only to localised areas of curtilage. The A862 to the north of the site is, however, a well-used recreational route, being part of the North Coast (NC) 500 long distance tourist route and also incorporating a signposted section of cycle route along the road side, extending to approximately 1km between Lovat Bridge and the junction between the A862 and B9164 adjacent the proposal site's access junction.

7.36 Visual effects of the development are localised and relatively well contained for receptors on these routes. Views for road users and cyclists, as experienced from Viewpoints 1 and 2, respectively looking west and south from the A862, would be generally oblique over the site, viewed through a series of localised gaps in intervening screening woodland viewing the proposals in the distance beyond existing pylons and backgrounded by woodland. The overall impacts would be moderate in significance, albeit experienced for relatively short durations, estimated from site visits to be between 10-12 seconds duration for vehicle drivers and passengers. Durations would however, be markedly longer for cycle and foot traffic and would be seen cumulatively with the existing overhead line and potentially, the proposed Beauly to Peterhead OHL, under 25/03986/S37. Effects across the wider study area will not be significant due to existing vegetation and landform limiting potential visibility as is most evident from the remaining Viewpoints 3. 4 and 5, within the 4km LVIA study area.

7.37 It is agreed that as such, the proposed mitigation will screen the BESS effectively as to assimilate it within its setting by Year 10 post development, although views south from the A862 will result in a major / moderate level of effects on visual amenity for cyclists and a moderate level of effect for other road users in the first year post construction.

7.38 In addition to the above, it is important to consider the context of the development in combination with other developments and assess the likely cumulative effects. Of particular importance is how renewable energy / electricity transmission developments relate to each other in design and relationship to their surroundings, their frequency when moving through the landscape and their visual separation to allow experience of the character of the landscape in between.

7.39 In this respect, cumulative effects would occur in combination with the existing Beauly Substation and 132kV overhead line network, the proposed Fanellan substation, as recently refused planning permission under 25/00826/FUL and the proposed Beauly to Peterhead 400kV overhead line, to which an objection was recently raised by the Council under 25/03986/S37. While the proposed development would contribute to increasing the influence of electricity infrastructure in the surrounding landscape, the potential for significant cumulative effects from the development is limited, considering the greater prominence within the landscape of the OHLs. As a result, considering the geographical separation of the surrounding developments within the study area, the proposed development would result in localised, not significant cumulative effects.

Amenity

7.40 There is likely to be some disruption during the anticipated construction period. 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 and deliveries are to be restricted to 08.00 – 19.00 Monday to Friday, 08.00 – 13.00 on Saturday with no Sunday or Public Holiday working or deliveries. Construction activities that do not generate impacts beyond the site boundary would be permissible outwith these hours.

7.41 In terms of the facility's operation, the BESS proposal employs inverters, switchgear, transformers and batteries, with the battery storage containers also fitted with air cooling units at low level on the sides of each container. As such, the operation of the facility will create a degree of noise with potential to impact residential amenity given there are properties in proximity. Following consultation and the applicant's provision of further information in relation to their Noise Impact Assessment, Environmental Health consider that, with the inclusion of the noise barrier proposed around the southern and eastern site boundaries, the proposals will meet the Council's noise criteria. The applicant has committed to ensuring that the final selection of plant and equipment will retain compliance with these criteria.

7.42 Environmental Health has advised that should the Scottish Minsters approve the development, planning conditions are required to stipulate that operational noise levels would not exceed a minimum of between 27 and 32 decibels $L_{Ar,\ 15\ min}$ at the curtilage of the nearest noise sensitive receptors, depending on the location and orientation of these. A condition could also ensure the submission of an updated Noise Impact Assessment (NIA) in advance of development commencing, with full details of the specific plant to be installed on site, the associated noise levels at the nearest noise sensitive receptors and mitigation to ensure the development complies with the specified noise limits. In this respect, Environmental Health noted that the current NIA confirms that the predicted noise levels as modelled, with the inclusion of a 4-metre-high acoustic barrier along the south and east site boundaries, will meet the Council's agreed criteria, however, with no further margin for error.

7.43 It should be noted that any subsequent (unexpected) noise complaint against the facility would be required to be treated as a Statutory Nuisance complaint under the Environmental Protection Act 1990 by Environmental Health. Environmental Health would then have the option to impose additional obligations on the site's operator to implement noise mitigation measures.

Soils

7.44 An assessment of the potential impacts of the proposed development on geology, hydrogeology and peat has been considered as part of ground investigation works completed to inform the project design and feasibility of the proposed development. No peat is found on site, as such, there are no predicted effects on peatland resources with the site currently being used as an agricultural field.

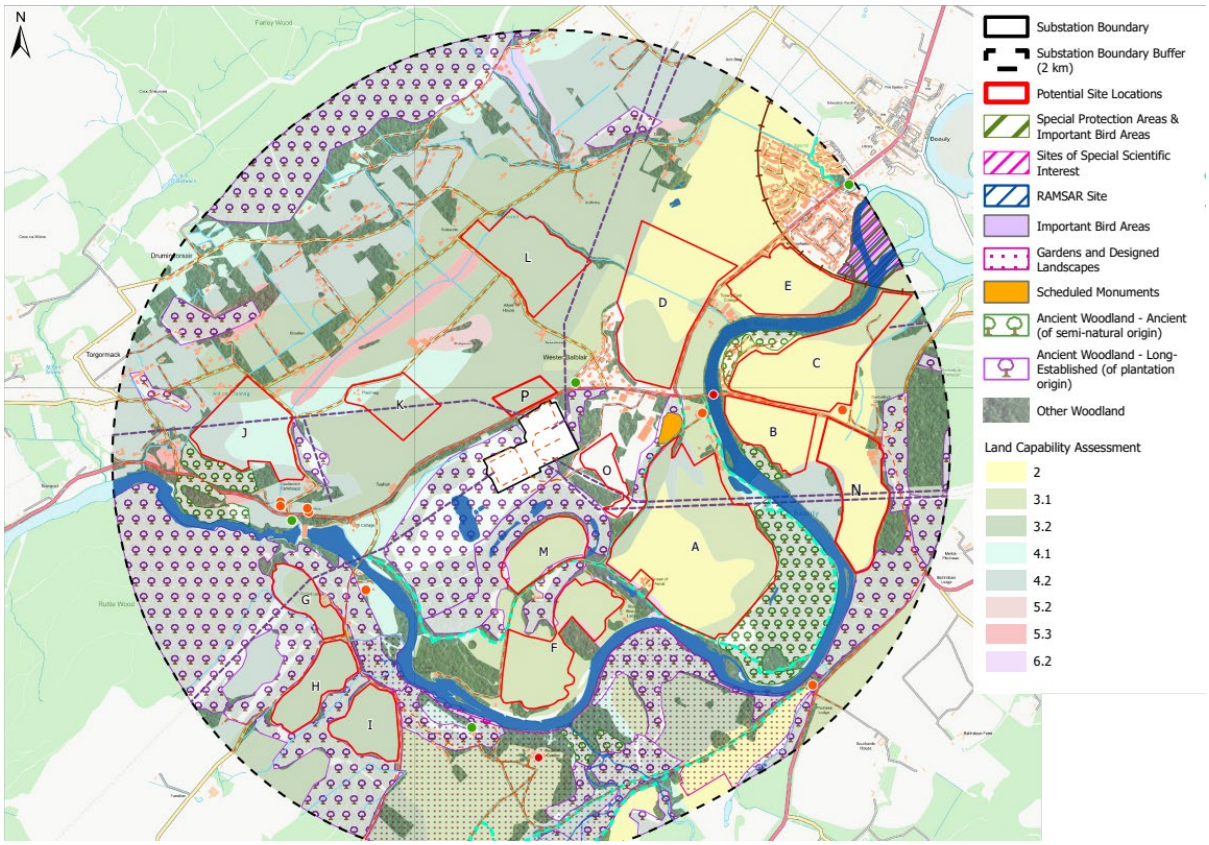
7.45 The application site boundary is assessed by the applicant as consisting of 13.71 ha of Class 2 and 0.89 ha of Class 3.1 agricultural land. This is all therefore classified

as Prime Agricultural Land within the land capability classification for agriculture developed by Macaulay Land Use Research Institute (now the James Hutton Institute). In respect of this resource, NPF 4 Policy 5 a) (i) states that development proposals will only be supported where they are designed and constructed in accordance with a mitigation hierarchy, by first avoiding and then minimising the amount of disturbance to soils on undeveloped land and in a manner that protects soil from damage and minimise soil sealing. Under NPF4 Policy 5 b) (iv) development proposals on prime agricultural land will only be supported for the generation of energy from renewable sources where there is secure provision for restoration and the layout and design of the proposal minimises the amount of protected land that is required. Furthermore, the Scottish Government's Planning Guidance: Battery Energy Storage Systems specifies that, where BESS development is proposed on peatland, carbon-rich soil, priority peatland habitat, or prime agricultural land, applicants should provide evidence of specific locational need and that there is no other suitable site, which may include robust evidence demonstrating consideration of alternatives. The basis that there is no other suitable site is therefore, the scenario which must be assessed in respect of this application.

7.46 The applicant has provided a statement on the management of soils and preservation of soil quality on site. Soils on site are assessed as having a low to moderate susceptibility to both structural damage and erosion. The applicant proposes a soil management plan be secured via condition, should the Scottish Minsters approve the development, that will outline detailed soil handling and protection measures. The applicant's landscaping bunds are sized, at a maximum height of 2m, to preserve soil quality, with grass and woodland planting argued to further consolidate soil stability and structure. Further measures are proposed at the decommissioning stage to ensure that the baseline agricultural capacity is retained. Owing to the expected long term and unrestricted operational lifetime of the proposed development, any storage is also expected to be long term with the development resulting in the loss of prime agricultural land.

7.47 The applicant submitted an alternative site assessment, dated December 2024 and a further addendum, dated September 2025, which sets out how 16 sites, designated A-P were originally considered in locating the current application proposals. Of these 16, 3 sites, G, H and I were excluded from further consideration due to their location within the red line boundary for the proposed Fanellan SSEN substation, which was refused under application reference 25/00826/FUL at the February 2026 South Planning Applications Committee. Following assessment of the remaining 13 alternatives, as shown in **Figure 1**, Site N was chosen as the application site. Of the 12 remaining alternative sites, only 4 sites K, L, O and P are not located on prime agricultural land, with site O, directly adjacent the existing Beauly SSEN substation and designated as Class 888, or urban, on the Scotland's Soils online mapping.

Figure 1 – Applicant's Alternative Site Assessment



7.48 According to the applicant's assessment, sites K, L and P, were excluded from being considered any further due to having a steeper topography and having more open views than others. The applicant's assessment considers that although not situated on prime agricultural land, the topography of these sites would require more intensive engineering works to form a development platform, leading to more significant landscape and visual impacts, habitat disturbance, construction traffic movements and difficulties in reinstating the site following decommissioning of the BESS. While Site O is not impacted by any of these constraints, being lower lying and more well screened from the surroundings, the applicant discounted this site as the land was not available at time of search and the site was being considered for another BESS development, now granted planning permission under application 24/01548/FUL.

7.49 The applicant's assessment that there is no other suitable site in this instance, is however, not agreed by Officers. Sites K and L are both situated on significantly higher ground than the chosen application site, located between the 50 and 100m contours Above Ordnance Datum (AOD) and the applicant's assessment of difficulties in accommodating these are acknowledged. Site P however, is located considerably lower, between the 30 and 40m contours and is also located directly adjacent the existing Beauly Substation. The applicant argues in their initial assessment that the site would require substantial landscaping and screening to accommodate a BESS development, however due to the location directly opposite the existing substation, it is also suggested that the immediate landscape setting would not be impacted, due to the presence of this other electricity infrastructure. It is also suggested that the residential properties nearby, would necessitate cumulative

noise impact assessment considering the presence of the existing substation. Sites P is also considered, along with Site O, to be unsuitable as the land was not available for sale at the time of search.

7.50 The applicant's assessment concludes that Site O could have been a potential site for accommodating the proposed BESS, unconstrained by prime agricultural land and having limited landscape and visual impacts by virtue of the existing forestry screening. In this case, it is not agreed that the land ownership and acquisition issues stated provide a sufficient basis for the applicant to conclude that no other suitable sites exist, and therefore justify the finalised location of the proposed development on the prime agricultural land resource. Land ownership and the ability of applicants to acquire land for development are not material considerations within the scope of the planning system, with Site O being the subject of another BESS prospective development site, and a further consented, but yet to be developed BESS site, also being situated at Site J, as now granted planning permission under application, following appeal, under 23/03113/FUL.

7.51 The applicant's assessment discounts Site P, again, unconstrained by prime agricultural land, on the basis of the lack of existing screening and the potential landscape and visual impacts in addition to the potential cumulative noise impacts. However, given the results of the applicant's assessment of the current application site (Site N), it is not considered that these impacts would be insurmountable constraints to development. In promoting the current application site (Site N) the applicant's supporting assessments conclude that both significant landscape and visual and noise constraints could be satisfactorily addressed through mitigation, as is not disputed by the Council's Landscape and Environmental Health Officers in their respective consultation responses. Therefore, the applicant's assessment is not considered necessarily robust in justifying that the other possible locations were so constrained in terms of the material planning considerations, as to make the current application Site N, with its impacts in terms of the loss of prime agricultural land, the only suitable location for the development in this area.

7.52 In terms of locational need for more BESS development in this area, in their additional supporting information statement on community benefits and needs case, the applicant argues that, as a 100MW, transmission connected scheme, the proposals are critical to the function of the national electricity grid. It is argued that only a transmission connected BESS project such as this, with a real time connection to the National Energy System Operator (NESO), can effectively provide transmission constraints services, compensating for 'curtailment' when renewables generators must be turned off due to lack of transmission grid capacity, balancing power reserves when demand outpaces forecast or actual supply and otherwise, stabilising grid supply. How much weight can be attributed to the applicant's stated site-specific need is however questioned and it is Officers view that this has not be acceptably justified in the submission to accept the loss of prime agricultural land.

7.53 Officers consider that at the point when all other suitable sites within the study area have been developed, the next best sequential option should be to develop one or multiple BESS at the generation sources, rather than at the expense of prime agricultural land, unless there was clear imperative justification from a grid operational perspective to do so, and that this requirement could not be resolved by other means on the network. In this case, the more general grid operational benefits

of locating BESS proposals of this scale in proximity to the electricity transmission network that the applicant states in their needs case, are acknowledged.

7.54 The applicant has not however, provided a more detailed needs case for the proposal to connect to the Beauly Substation specifically, as opposed to elsewhere on the transmission network, and has not provided further justification from either NESO or SSEN that the development is essential from a grid operational perspective in this location.

7.55 As such, the proposals in their current form, despite the soil management and preservation measures proposed, do not comply with the mitigation hierarchy of NPF4 Policy 5 a) (i) as they neither, in the first instance, avoid nor minimise the disturbance to soils on undeveloped land, being located wholly within Class 2 and 3.1 prime agricultural soils. In this respect, the proposals on their current siting also do not comply with NPF Policy 5 b) (iv) in that the layout and design fail to minimise the amount of protected, prime agricultural land that is required to accommodate development.

Habitats

7.56 Disturbance to any habitats is expected to be minimal, with no formal designations within the immediate area. Biodiversity enhancement measures would be introduced to provide mitigation, in accordance with NPF4 Policy 3(b), which states that "development proposals for national or major development… will only be supported where it can be demonstrated that the proposal will conserve, restore and enhance biodiversity". The applicant's proposal, as noted in the submitted Ecology and Biodiversity Enhancement Assessment, would achieve a biodiversity net gain meeting the Council's 10% requirement. Delivery and maintenance of these measures can be secured by condition, should the Scottish Minsters approve the development.

7.57 An Outline Construction Environment Management Plan (OCEMP) has been submitted, the delivery of which, along with the requirement for an Environmental Management and Pollution Prevention Plan can be conditioned. A condition would also secure the implementation of the site's Habitat Management Plan (HMP). The Ecology Team has also requested conditions controlling the submission of pre-construction surveys, surveys of nesting birds prior to construction and GIS shapefile data. An Environmental Clerk of Works (EnvCoW) will be appointment to oversee the project along with a Planning Monitoring Officer to oversee compliance with the conditions attached to any consent that may be forthcoming.

Protected Species

7.58 A Preliminary Ecological Appraisal (PEA) of the site was undertaken by the applicant, with field surveys in August 2024. The main habitats on site comprise of modified grassland. No evidence of protected species was recorded within the development boundary; however, it was assessed as capable of supporting reptiles, amphibians (not including great crested newts) and potentially foraging bat species. Additionally, the PEA concludes that the proposals are positioned within the disturbance range of Osprey.

7.59 The Ecology Team note that any clearance of vegetation should be undertaken outwith the breeding bird season (between March to August, inclusive). Any clearance within these months will require a nesting bird check undertaken by a suitably experienced ecologist. Given the potential for amphibians and reptiles on site, site clearance will be undertaken under a Species Protection Plan / Method Statement. Any external lighting, whether temporary or permanent, must be "wildlife friendly" and directional, to avoid illuminating surrounding habitats.

7.60 Several representations raised concerns regarding the potential impact of the proposed development on the surrounding watercourses and the hydrologically connected natural heritage designations, the Inner Moray Firth Special Protection Area (SPA), Moray Firth SPA and Moray Firth Special Area of Conservation (SAC). The site's status in this respect, means that the requirements of the Conservation (Natural Habitats, and c.) Regulations 1994 as amended (the 'Habitats Regulations') apply or, for reserved matters, The Conservation of Habitats and Species Regulations 2017. Consequently, the Energy Consents Unit is required to consider the effect of the proposal on the SPAs and SAC before it can be consented (commonly known as Habitats Regulations Appraisal). NatureScot's advice is that the proposal is likely to have a significant effect on all features of the Inner Moray Firth SPA and Moray Firth SPA and the Moray Firth SAC. Consequently, the Energy Consents Unit, as competent authority, is required to carry out an appropriate assessment in view of the site's conservation objectives for its qualifying interest(s). The Inner Moray Firth SPA is protected for a range of wintering wildfowl including greylag goose as well as breeding osprey. The Moray Firth SPA is protected for a variety of non-breeding seabirds. The Moray Firth SAC selected for bottlenose dolphin and subtidal sandbanks.

7.61 Based on the supporting information provided, NatureScot's conclusion is that the proposals are likely to have a significant effect on all features of the SPAs and SAC, with the potential for surface water pollution during construction, operation and as a result of emergencies related to the proposals in addition to the potential disturbance to bird species and loss of foraging habitat. In relation to disturbance concerns, NatureScot concludes that there would be no disturbance to species other than breeding Osprey, which may be connected to the Inner Moray Firth SPA population, but nesting outside the area. NatureScot have no objection to the proposals subject to conditions to secure a Construction Environment Management Plan (CEMP) to ensure contamination does not enter any watercourses, and a pre-construction Osprey survey and Species Protection Plan (SPP) for Osprey alongside dedicated ornithological monitoring.

7.62 NatureScot additionally appraised the proposals in terms of the potential natural heritage impacts that might result from a fire at the site, which has the potential to damage features of the hydrologically connected SPAs and SAC. NatureScot have no objection subject to the applicant detailing the measures via which firefighting water will be contained and disposed of to avoid the potential for it to enter a watercourse. In this regard, and as discussed in more detail below, the proposal has been designed to provide an attenuation basin in the western part of the site. The drainage design of the site has been sized to ensure that the full volume of fire water run off can be intercepted and contained on site within the attenuation basin. The drainage system will include a mechanism to prevent discharge from the site into the

surrounding environment so that fire water may be assessed for contamination and safely disposed of offsite.

7.63 As outlined in Section 5, Beauly Fishery Board raised concerns regarding potential impacts on the River Beauly from emergency fire water abstraction. The applicant has since intimated that their emergency management strategy does not involve such abstraction. The proposal does not achieve the 50m buffer specified in the Fishery Board's response, however, as noted below, SEPA has not raised any objection in this regard.

Built Heritage

7.64 Highland Council's Historic Environment Team and Historic Environment Scotland have no objections to the proposed development subject to the submission of a detailed archaeological Written Scheme of Investigation which can be secured by condition.

Health and Safety

7.65 The battery cabinets would consist of steel enclosures, and each will include fire detection and suppression systems. The National Fire Chiefs Council (NFCC) Guidance has, of December 2025, been published in an updated form. The Guidance points to different design approaches that may lead to different spacing requirements, and it does not specify a minimum distance in terms of layout. The applicant states that the proposed separation distance is designed to prevent any spread of fire between units. The battery units would be monitored on a 24/7 basis and any malfunction or thermal issue in one would be immediately detected and the relevant component shut down. The submission includes details of health and safety arrangements and fire suppression. The design and layout have been proposed to ensure that a runaway fire in one of the battery units would not spread to other units. In the event of a fire within an individual unit, a venting system is designed to prevent flammable gases from building up, assisting with firefighting, and preventing any potential risk of explosion from combustion products when exposed to the air. Monitoring of individual cell temperatures forms part of the management of the site.

7.66 A firefighting and emergency strategy would be agreed with Scottish Fire and Rescue once final technical specifications are known. At a recent appeal case, where a Reporter upheld an appeal against THC's refusal of planning permission for a BESS at Kilmorack near Beauly (PPA-270-2310), the Reporter observed that he did not consider that the specific matters of fire risk and the fire safety standards of battery energy storage systems to be directly planning considerations. The Reporter concluded that matters related to management of fire risk, such as agreement of a firefighting and emergency strategy, as is proposed in this case, would be for the appellant and the Scottish Fire and Rescue Service in the context of existing fire regulations and not for the Planning Authority to regulate through planning conditions. The Reporter did however conclude that where fire related matters impact on issues that are within the scope of planning considerations (such as access, layout, and the appearance of a development), then they can be indirectly relevant to a planning decision. Where fire safety measures potentially have

implications for designated sites, this would also be material to planning considerations in instances where a proposal could impact on such a site.

7.67 In this regard, the proposal has been designed to provide an attenuation basin in the western part of the site. The intended firefighting strategy is a controlled burn, where the strategy is to allow an individual battery unit that catches fire to consume itself rather than applying water. In these circumstances, the updated NFCC Guidance recommends a total water supply on site of 180,000 litres, suitable to supply a flow rate of 25l/sec for up to two hours (a total of 180m^3 of water). In this regard, the applicant proposes an onsite capacity, within a firefighting water tank in the northern part of the site, of 230m^3. Water run off during firefighting has the potential to hold contaminants, although the concentration of these would be expected to be low as no water will be applied directly to the battery units. The drainage design of the site has been sized to ensure that the full volume of fire water run-off (up to 230m^3) can be contained on site within a dedicated clay lined ditch, with additional excess capacity as contingency. The drainage system will include a mechanism to prevent discharge from the site into the surrounding environment in the form of an automatic penstock valve.

7.68 Whilst matters of fire risk and the fire safety standards may not be material planning considerations, any changes to the development layout or design, necessary to comply with fire safety requirements may have an impact on final site layout and design. A planning condition could therefore be proposed to allow for a degree of adjustment within the development site, however, if substantial changes to site layout and design are required, this would require a new or varied consent.

7.69 Notwithstanding the Reporter's comment in respect of the materiality of fire safety matters in the Kilmorack appeal, a firefighting and emergency strategy submitted and agreed prior to the delivery of battery equipment to the site, can be secured by condition. Representations raised particular concerns regarding fire risk and safety, however, with these plans and procedures in place, the applicant has demonstrated that the proposal's potential adverse impacts on human health, safety, and the environment, in the 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.

7.70 It should also be noted that firefighting and emergency strategy will be a working document 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 Authority to regulate. Consequently, the ongoing currency of these documents will be the responsibility of the operator in consultation with the relevant agencies including the Scottish Fire and Rescue Service. The Scottish Fire and Rescue Service (SFRS) do not respond to individual planning applications instead relying on NFCC Guidance for Grid Scale BESS. At this present time, there is no further guidance available from SFRS on BESS site developments. In the absence of a national approach, no regional office comment can be provided, however, the guidance provided helps inform the Planning Authority's consideration of the application, as noted above. This proposal has been found to be in general accordance with the NFCC guidance. A condition could be suggested to secure

details of the final layout of the proposal, which will be required to reflect best practice in that regard, should the Scottish Minsters approve the development.

Traffic and Transport

7.71 Access to the site would be via an existing junction with the A862 serving the farm buildings to the north of the site. The applicant also proposes a temporary construction access, at a point some 570m to the west. Within the site a 5m wide single lane perimeter access track is proposed around the perimeter of the battery and substation compounds extending to the battery units and other infrastructure.

7.72 The Transport Statement (TS) states that it is anticipated that daily deliveries to the site would peak in the first year of construction during the establishment of the site which will include the groundwork and main civils work. During this phase, weekday HGV traffic would peak at a maximum of 27 HGV trips per weekday.

7.73 The Council's Transport Planning Team initially objected to the proposals on the basis that the existing farm access with the A862 was not safe for any intensification as a result of the construction and ongoing operation of the proposed BESS , due to its proximity with the junction opposite for the B9164 and the restricted visibility from that access looking southeast along the A862. A further point of objection related to the proximity of the proposed temporary construction access to the junction of the A862, B9164 and the farm access junction referenced above. Following the submission of further information and clarification from the applicant, including relocation the proposed construction access junction further west along the A862, the Transport Planning Team's initial objection was withdrawn. Transport Planning continues however, to recommend that the applicant consider retaining the proposed temporary construction access for operational needs. The applicant is also recommended to continue to engage with the Council's Structures Team on the need for specific assessment of the impacts of abnormal loads on the Lovatt Bridge, to the west of the site.

7.74 The applicant's Transport Statement and Construction Traffic Management Plan, dated December 2024, includes an assessment of the cumulative traffic impacts on the public road network of the proposals, in association with other nearby schemes in planning. Given the minimal operational traffic requirements, this focuses on construction vehicle routing, from the A9 at Tore roundabout and then via the A832, B9169 and A862 to the site. The applicant's assessment concludes that there would be no cumulative impacts associated with these schemes, on the basis that they have not identified any further proposals that would raise such impacts. In this respect, the applicant's assessment is considered to substantially underplay the potential cumulative traffic issues, as it fails to acknowledge other major and national scale proposals that will utilise the same parts of the road network as the current application. This omission is most marked in terms of the proposed Fanellan substation, refused planning permission by the Council at the February 2026 South Planning Applications Committee and subsequently pending consideration by the DPEA under planning appeal. The substation's indicative construction traffic routing, to be confirmed through appeal, is, as in the case of the current BESS application, from the A9 at Tore roundabout and then via the A832, B9169 and A862, and thereafter onto the A831 and C1106 Fanellan Road, from the junction of the former with the A862 to the west of the BESS site. The applicant's cumulative assessment

has no regard to the additional impacts of construction traffic associated with the substation, nor the other energy related developments in the area, as evidenced in Section 3 of this report. Through discussion with the Case Officer, the applicant has however, indicated that they would be willing to reconsider the construction traffic routing. This could be addressed through a revised Construction Traffic Management Plan (CTMP), secured via condition, should the Scottish Minsters approve the development. The revised CTMP must include a month-by-month breakdown of the types and quantities of construction traffic that will be routing to and from the development informed by direct input from the proposed main contractor. It should confirm the routing of such traffic and the measures that will be taken to avoid local traffic peaks, including school drop-off and pick-up times. Where such peaks cannot be avoided, the Council may not agree the CTMP without amendments to the construction schedule on the part of the applicant. It is noted that over the 24-month construction period, peak traffic flows are anticipated to occur in Month 11. The maximum impacts anticipated by the applicant's assessment in terms of construction traffic flows above the baseline flow, will be 1.61% on the A862 at the site construction access. Given the limited scale of these impacts relative to other large scale projects in the area, particularly Fanellan substation which is the most significant in terms of cumulative traffic impacts in the area, it is not considered, despite the omissions in the original Transport Statement, that these issues are as severe as to warrant an additional reason for objection.

7.75 The proposed BESS will also require an Abnormal Indivisible Load (AIL) delivery of transformers for the site, with the applicant proposing the same route as for general construction traffic, as described above. In their consultation responses, the Transport Planning Team raised concern over previous feedback from the Council's Structures Team, that no AIL movements should be taken across Lovat Bridge that carries the A862 over the River Beauly without a detailed inspection and bridge assessment being undertaken, including a diving survey of the piers within the River Beauly, which they clarified, have historically suffered from scouring. The applicant is recommended to continue to engage with the Structures Team in this respect, as to whether such survey work is required. In their response to the Transport Planning Team, the applicant cites previous AIL deliveries over the Lovat Bridge, in excess of the 88.4 tonnes required for their own current proposals. Nevertheless, a risk to the viability of the proposals remains in the form of the financial burdens associated with any investigation or remedial works to the Lovat Bridge, should it be confirmed that these are required. Should the Scottish Minsters approve the development, the applicant has indicated that they would be willing to consider an alternative AIL routing via the A862 from the east, through Inverness, however, there are also identified constraints if routing from that direction. A condition could be attached to secure an updated Abnormal Load Assessment (ALA) in this respect, as well as a wear and tear agreement.

7.76 The closest trunk road to the site is the A9, located approximately 14.5km to the northeast at the Tore Roundabout. Transport Scotland consider that the magnitude of generated trips is unlikely to have any discernible traffic impact on the trunk road and no further trunk road assessment is required.

Flood Risk and Drainage

7.77 Surface water runoff currently flows overland following the topography of the site and infiltrates into underlying soils. The applicant's fire water management strategy requires that the engineered layers beneath the surface finish of the site be made impermeable to direct surface water runoff efficiently into the clay lined attenuation basin, which will direct surface water through pipes and a manhole fitted with a penstock stop valve, into an infiltration basin in the south western part of the site, suitably designed to ensure pollution mitigation.

7.78 The Drainage Strategy submitted by the applicant in support of the application has confirmed no private water supplies will be impacted by the proposed development. The site finish will be compacted to be impermeable and all surface water run-off will therefore be diverted through the underground drainage system via filter drains and attenuated in the attenuation basin which is fitted with penstock valves to prevent discharge to the wider water environment in any contamination event.

7.79 The Council's Flood Risk Management Team and SEPA have no objection to the application subject to a condition controlling the final surface water drainage design. SEPA has confirmed that the development is located slightly within their recommended riparian buffer, which for larger rivers such as the Beauly in this location, is 30 m. SEPA have additionally, checked the information held on geomorphic risk in this area and confirm that this stretch of the river adjacent the site has not been identified as an area of specific risk of erosion.

Decommissioning and Reinstatement

7.80 The proposed development would have an operational life of 40 years, after which the site would be restored to its former use. 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, should the Scottish Minsters approve the proposals. The DRP would be prepared in consultation with and approved by the Planning Authority prior to the commencement of any works. Decommissioning works would then be undertaken in accordance with a statement of operations covering safety and environmental issues, including the safe removal of electrical equipment and foundations down to 1m below ground level, to ensure the site can be effectively returned to its former use. The DRP will also outline measures to safeguard and guarantee finances in the event the operator or owner is no longer solvent. The strategy and financial safeguard would also require to be reviewed at regular intervals.

Other Material Considerations

7.81 Representations raise concerns about the potential health impacts of electromagnetic interference (EMI) from the proposed facility which they consider would adversely impact health and wellbeing of residents within the surrounding area. The Planning Authority is not responsible for the applicant complying with standards and requirements of other authorities, such as in respect of electro-magnetic disturbance. Even so, the applicant has confirmed that the proposed

development would be constructed and operated in line with all adopted British standard guidelines and regulations as it relates to BESS.

7.82 The associated grid connection for this scheme, along with other renewable energy developments, was previously considered by the Planning Authority and ECU, through the screening process, as not forming part of the overall 'project' in EIA terms. This previous position has been challenged by the decision on Raeshaw Wind Farms Ltd v Scottish Ministers [2026] CSIH 2010. In that case, the Court held that the Reporter erred in law by failing to undertake the necessary fact-specific evaluative exercise as to whether the wind farm and its required grid connection formed a single EIA "project", and by proceeding on the basis that it was sufficient that the grid connection did not form part of the application and could be considered later through a separate consenting process. The Court also made clear that the question is not dependent on any intention to avoid EIA, but on whether, in substance, what is proposed should be treated as a single project for environmental assessment purposes. Relevant considerations include the non-exhaustive factors identified in R (Wingfield) v Canterbury City Council [2020] JPL 154, including functional interdependence and whether the deferred works are properly to be regarded as a stand-alone project, alongside consideration of the true nature and scope of the project and the degree of connection between its component part.

7.83 Whilst the applicant's Planning, Design and Access Statement does mention the required grid connection, it only briefly confirms that the developer has an accepted grid offer and that SSE will undertake the further design work, consenting and construction for the underground cable route. The applicant has confirmed as of the time of writing of this report, only an indicative routing is available. The actual grid connection infrastructure, including the cable route, joint bays and any further related works is therefore, not part of this application and is not detailed further in the applicant's supporting information. It is considered that the proposed development and its required grid connection are functionally interdependent, in that the scheme could not operate for its intended purpose without connection to the grid. It is considered that the assessment of the project for EIA purposes, including the original screening opinions, cannot be determined solely by the way in which the current application has been framed so as to exclude the off-site grid connection infrastructure but requires consideration of the true nature and scope of the project in substance. In that regard, the fact that the grid connection infrastructure may come forward under a separate consenting process does not, in itself, resolve whether the wider scheme has been properly assessed for EIA purposes. It is further noted that the energy and operational benefits relied upon in support of the proposed application depend upon a grid connection being delivered. It is therefore considered that the grid connection is an essential component of the wider scheme, and that its omission from the application gives rise to a legitimate concern as to whether the full environmental effects of the project have been assessed. For that reason, this matter has been taken into account in the Council's proposed objection to the application. However, Scottish Ministers are the decision-maker, and it is ultimately a matter for them to determine, in light of Raeshaw, whether the proposed development and its required grid connection constitute a single project for EIA purposes and whether the original screening opinion request before them, is legally adequate.

Non-Material Considerations

7.84 Representations raise concerns that there is an over-provision of renewable energy development and associated infrastructure such as BESS within the wider Highland region. Whilst there are various renewable projects in the wider surrounding area, all such proposals require assessment on their own merits and are rightly subject of individual applications. NPF4 makes clear that grid capacity should also not constrain renewable development.

7.85 Representations raise concerns regarding potential impact on views from surrounding properties and effect on property value is not considered a material planning consideration. Planning decisions are primarily concerned with the public interest along with the development and use of land as opposed to individual views and private financial interests.

8. MATTERS TO BE SECURED BY LEGAL AGREEMENT

8.1 It is noted that Transport Planning have recommended that any permission issued includes a requirement for the Developer to enter into a formal Wear and Tear Agreement with Highland Council, in accordance with Section 96 of the Roads (Scotland) Act 1984. Any such agreement is likely to require a Road Bond or some other form of financial security to protect the Council from any such extraordinary expenses. This agreement is required to be specified within the Construction Traffic Management Plan.

8.2 A decommissioning and restoration financial guarantee can be secured by condition.

8.3 The Council is currently promoting the development of the Beauly Firth Loop cycle route that aims to provide dedicated facilities to support safe active travel usage along the A862. Given that this development will be impacting on this route, both during its construction and ongoing operation, the Transport Planning Team recommends that, should the Scottish Minsters approve the development, any permission issued includes a requirement to make a suitable financial contribution towards the ongoing delivery of dedicated active travel facilities along the A862. Transport Planning has identified that financial contributions would be necessary towards road safety improvements in Beauly Town and active travel improvements along the A862 towards Inverness and this would be in the order of £31,944. This is required to be secured by way of legal agreement or upfront payment prior to the issued of any permission. Given the proposal type and its lack of public prominence it would be inappropriate to seek a developer contribution for public art. The provision and maintenance of additional planting with amenity and habitat value is an appropriate contribution to green infrastructure.

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. 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.

9.2 The Scottish Government gives considerable commitment to renewable energy and encourages BESS developments on the basis that they will play an important role in Scotland's transition towards a low-carbon, resilient, and efficient energy system. In this respect, the project has the potential to contribute up to 100 MW of battery storage capacity and play a role in the route to a net zero Scotland. In addition, the development has potential to bring economic benefits to the area and to create new jobs.

9.3 However, as with all applications, a balancing exercise must be undertaken. The benefits of the proposal must be weighed against potential drawbacks and then considered in the round, taking account of the relevant policies of the Development Plan, which includes NPF4, as well as all other material planning considerations.

9.4 The report has set out that the impacts and effects of the proposal as they relate to construction, built and cultural heritage, roads, traffic, transport, and access, the water environment, amenity as it relates to noise, and landscape and visual impacts, would be within acceptable limits subject to the developer's compliance with conditions requested by consultees.

9.5 This report has also concluded however, that the applicant's assessment of alternative sites is not necessarily robust in justifying that the other possible locations were so constrained in terms of the material planning considerations, as to make the current application site, with its impacts in terms of the loss of prime agricultural land, the only suitable location. As such, the proposals in their current form, despite the soil management and preservation measures proposed, do not comply with the mitigation hierarchy of NPF 4 Policy 5 (Soils) a) (i) as they neither, in the first instance, avoid nor minimise the disturbance to soils on undeveloped land, being located wholly within Class 2 and 3.1 prime agricultural soils, as defined within the land capability classification for agriculture developed by Macaulay Land Use Research Institute (now the James Hutton Institute). In this respect, the proposals on their current siting also do not comply with NPF Policy 5 b) (iv) in that the layout and design fail to minimise the amount of protected, prime agricultural land that is required to accommodate development.

9.6 Significant weight has been given to the global climate and nature crises in this assessment. However, the significant impacts on prime agricultural land are considered to outweigh the proposal's benefits and contributions to mitigate both crises and are sufficient reason to recommend the Council Raises an Objection to the application with the Scottish Ministers.

9.7 An underground cable will be required to connect the development to the national grid. This grid connection will be applied for separately by SSE, and its precise form, route and infrastructure are not yet confirmed. As the off-site grid works do not form part of the current application, it is considered that this raises a substantive issue as to whether the full extent of the project has been identified and assessed for EIA purposes, having regard to the considerations identified in Raeshaw.

9.8 In light of Raeshaw Farms Ltd v Scottish Ministers [2026] CSIH 10, it is considered that the required grid connection is an essential and functionally interdependent part of the wider scheme, given that the development could not operate for its intended purpose without connection to the national grid. On that basis, it is considered that the omission of the grid connection infrastructure from the application raises a legitimate concern as to whether the full environmental effects of the project have been assessed at the screening stage, and this forms part of the basis for the Council's proposed objection to the application. However, Scottish Ministers are the decision-maker, and it is ultimately a matter for them to determine whether the proposed development and grid connection together constitute a single project for EIA purposes and whether the assessment, including the EIA screening opinion request before them, is legally adequate.

9.9 All relevant matters have been taken into account when appraising this application. It is considered that the proposal does not accord with the principles and policies contained within the Development Plan and is unacceptable in terms of applicable material considerations.

10. IMPLICATIONS

10.1 Resource: There are significant staffing and financial resource implications should 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 storage of renewable energy.

10.5 Risk: Not applicable

10.6 Gaelic: Not applicable

11. RECOMMENDATION

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

11.1 It is recommended that the Council continue to **RAISE OBJECTION** to the application subject to A. and for the reasons set out in B and C below:

A Members granting delegated authority to the Area Planning Manager – South to respond to the Scottish Government's Energy Consents Unit / Scottish Minsters, regarding any future Further / Supplementary Environmental Information, where that information does not materially reduce the scale, or adverse environmental effects, of the proposed development.

Reason for Objection

B. The application does not accord with the provisions of Section 36 of the Electricity Act 1989 by virtue of not demonstrating sufficient regard to the desirability of, and failing to reasonably mitigate effects detrimental to, conserving physiographical features of special interest and as such, failing to demonstrate compliance with NPF4 Policy 5 (Soils) owing to the proposal resulting in unacceptable impacts on Prime Agricultural Land. Consequently, the proposal is contrary to National Planning Framework 4 (NPF4) Policies 5 a) (i) and b) (iv), and HwLDP Policies 55 (peat and Soils) and 67 (Renewable Energy Developments), in that, it has not been satisfactorily demonstrated that the siting of the development accords with the mitigation hierarchy of first avoiding and then minimising the amount of disturbance to soils on undeveloped prime agricultural land.

C. The required grid connection is an essential and functionally interdependent element of the proposed development, but the grid connection infrastructure has not been included within the application and has not been assessed in the applicant's EIA screening opinion request. It is therefore considered, having regard to Raeshaw Farms Ltd v Scottish Ministers [2026] CSIH 10, that there is insufficient environmental information before the decision-maker to conclude that the true nature and scope of the project, and its likely significant environmental effects, have been lawfully and adequately assessed for EIA purposes.

Signature:	Bob Robertson
Designation:	(Acting) Planning Manager – South
Author:	Michael Kordas
Background Papers:	Documents referred to in report and in case file.
Relevant Plans:	Plan 1 – Location Plan 002.1 Rev 00
	Plan 2 – Site Layout Plan 001.1 Rev 08
	Plan 3 – Site Elevations with Fencing 005.4 Rev 01
	Plan 4 – Site Elevations without Fencing 005.5 Rev 01

Appendices: Appendix 1 – Letters of Representation
Appendix 2 - Development Plan and Other Material Policy Considerations
Appendix 3 - Compliance with the Development Plan / Other Planning Policy

Appendix 2 – Development Plan and Other Material Policy Considerations

DEVELOPMENT PLAN

National Planning Framework 4 (NPF4) (2023)

A2.1 The NPF4 policies of most relevance to this proposal include:

1 - Tackling the climate and nature crisis.
2 - Climate mitigation and adaptation
3 - Biodiversity
4 - Natural places
5 - Soils
6 - Forestry, Woodland and Trees
7 - Historic assets and places
11 - Energy
12 - Zero waste
13 - Sustainable transport
18 - Infrastructure first
20 - Blue and green infrastructure
22 - Flood risk and water management
23 - Health and safety
25 - Community wealth benefits
26 - Business and industry
29 - Rural development
33 - Minerals

Highland Wide Local Development Plan (HWLDP) 2012

A2.2 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
53 – Minerals
54 – Mineral Wastes

55 - Peat and Soils

56 - Travel

57 - Natural, Built and Cultural Heritage

58 - Protected Species

59 - Other Important Species

60 - Other Important Habitats and Article 10 Features

61 - Landscape

62 - Geodiversity

63 - Water Environment

64 - Flood Risk

65 – Waste Water Treatment

66 - Surface Water Drainage

67 - Renewable Energy Developments

72 - Pollution

73 - Air Quality

74 - Green Networks

77 - Public Access

78 - Long Distance Routes

Inner Moray Firth Local Development Plan 2 (IMFLDP2) (2024)

A2.3 1 – Low and Zero Carbon Development

2 – Nature Protection, Restoration and Enhancement

9 – Delivering Development and Infrastructure

Other Highland Council Supplementary Guidance

A2.4

- Biodiversity Enhancement Planning Guidance (May 2024)
- Developer Contributions (Nov 2018)
- Flood Risk and Drainage Impact Assessment (Jan 2013)
- Green Networks (Jan 2013)
- Highland Historic Environment Strategy (Jan 2013)
- Highland's Statutorily Protected Species (Mar 2013)
- Physical Constraints (Mar 2013)
- Roads and Transport Guidelines for New Developments (May 2013)
- Sustainable Design Guide (Jan 2013)
- Special Landscape Area Citations (June 2011)

- Standards for Archaeological Work (Mar 2012)
- Sustainable Design Guide (Jan 2013)

Emerging Highland Council Development Plan Documents and Planning Guidance

A2.5 The Highland-wide Local Development Plan is currently under review and is at Main Issues Report Stage. It is anticipated the Proposed Plan will be published following publication of secondary legislation post National Planning Framework 4.

A2.6 In addition, the Council has further advice on delivery of major developments in a number of documents which includes Construction Environmental Management Process for Large Scale Projects (Aug 2010).

Other National Guidance

A2.7
- Climate Change (Emissions Reduction Targets) (Scotland) Act 2019 – interim and annual targets replaced by Climate Change (Emissions Reduction Targets) (Scotland) Bill in November 2024
- Climate Change Committee Report to UK Parliament (July 2024)
- UK Government Clean Power Action Plan (Dec 2024)
- Draft Energy Strategy and Just Transition Plan (2023)
- Draft Scottish Biodiversity strategy to 2045: tackling the nature emergency (2023)
- Scottish Energy Strategy (2017)
- 2020 Routemap for Renewable Energy (2011)
- Energy Efficient Scotland Route Map, Scottish Government (2018)
- Historic Environment Policy for Scotland, HES (2019)
- PAN 1/2011 - Planning and Noise (2011)
- PAN 60 – Planning for Natural Heritage (2008)
- Circular 1/2017: Environmental Impact Assessment Regulations (2017)
- PAN 68 – Design Statements (Aug 2003)
- Health and Safety Guidance for Grid Scale Electrical Energy Storage Systems' (UK Government, Mar 2024)
- Scottish Government Planning Guidance: Battery Energy Storage Systems (March 2026)
- National Fire Chiefs Council's guidance - Guidance on Grid Scale Battery Energy Storage System planning (Nov 2022) ('the NFCC guidance') and a related draft revision (Jul 2024) approved for publication (Dec 2025).

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

National Policy

A3.1 NPF 4 forms part of the Development Plan and was adopted in February 2023. It comprises three parts:

- Part 1 – sets out an overarching spatial strategy for Scotland in the future. This includes spatial principles, national and regional spatial priorities, and action areas;
- Part 2 – sets out policies for the development and use of land to be applied in the preparation of local development plans; local place plans; masterplans and briefs; and for determining the range of planning consents. This part of the document should be taken as a whole in that all relevant policies should be applied to each application; and
- Part 3 – provides a series of annexes that give the rationale for the strategies and policies of NPF4, it outlines how the document should be used, and sets out how the Scottish Government will implement the strategies and policies.

A3.2 **Part 1 - the Spatial Strategy** explains the unprecedented national challenges and need to reduce greenhouse gas emissions and adapt to future impacts of climate change. It sets out that that Scotland's environment is a national asset which supports the nation's economy, identity, health and wellbeing and explains that choices need to be made on sustainable use of natural assets in a way which benefits communities. The spatial strategy reflects legislation in setting out decisions required in the long-term public interest. However, in doing so it is clear that the right choices about where development should be located need to be made to ensure clarity over the types of infrastructure provided and the assets that should be protected to ensure they continue to benefit future generations. The Spatial Priorities support the planning and delivery of sustainable places to reduce emissions, restore and better connect biodiversity; liveable places for better and healthier lives; and productive places where there is a greener, fairer and more inclusive wellbeing economy.

A3.3 At the national 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. This aim is not new and will clearly require a balancing exercise to be undertaken, which is reflected throughout NPF4.

A3.4 **Part 2 – Policies: 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 contributing to the enhancement of biodiversity, as required by NPF4 Policy 3.

A3.5 NPF4 Policy 3 Biodiversity intends to protect biodiversity, reverse biodiversity loss, deliver positive effects and strengthen nature networks. Under NPF4's policy emphasis on biodiversity, all forms of development are required to include appropriate measures to conserve, restore and enhance biodiversity proportionate to the nature and scale of development. The requirement to deliver biodiversity enhancement is a new duty.

A3.6 Highland Council's Biodiversity Enhancement Planning Guidance was adopted in 2024 and is a material consideration. It is aimed at developers, agents, architects and their consultants. The guidance explains the approach that is required by the Highland Council to deliver biodiversity conservation, restoration and enhancement through the planning system. This guidance has been prepared to support the application of the National Planning Framework 4 (NPF4) and is intended to be used in conjunction with relevant national and local policy and planning guidance. Scottish Government has published draft biodiversity planning guidance setting out the Scottish Ministers' expectations for implementing NPF4 policies which support the cross-cutting NPF4 outcome "improving biodiversity".

A3.7 In September 2023, the Scottish Government released independent research conducted by SRUC on "Approaches to Measuring Biodiversity in Scotland". The report's findings and recommendations propose practical steps for achieving a consistent, cross-government approach to measuring biodiversity at the site level. Specifically targeting the planning sector, NatureScot has initiated efforts to create an adapted biodiversity metric tailored for supporting the implementation of Policy 3b in National Planning Framework 4. This new tool aims to assist developers and planning authorities in evaluating the biodiversity enhancements resulting from developments. It will be applicable to major development projects, aligning with the goals of NPF4. While based on a metric utilised in England, it will be refined to suit Scotland's requirements.

A3.8 While NPF4 considers national developments as a focus for delivery, they should also be exemplars of the community wealth building approach to economic development. The intent of NPF4 Policy 25 Community wealth building is to encourage, promote and facilitate a new strategic approach to economic development that also provides a practical model for building a wellbeing economy at local, regional and national levels. NPF4 Policy 25 supports the following proposals:

- Development proposals which contribute to local or regional community wealth building strategies and are consistent with local economic priorities will be supported. This could include for example improving community resilience and reducing inequalities; increasing spending within communities; ensuring the use of local supply chains and services; local job creation; supporting community led proposals, including creation of new local firms, and enabling community led ownership of buildings and assets.

Development proposals linked to community ownership and management of land will be supported. Following consultation, the Highland Council's Community Wealth Building Strategy 2024-2027 was agreed by the Council on 19 September 2024. The strategy provides a framework that sets out how the Council will utilise different activities to maximise the impact of investment in local areas and support more local ownership of assets and wealth. The finalised version of the strategy will be uploaded to the Council's website in due course.

A3.9 Complementing those policies is NPF4 Policy 4 Natural Places, which sets out that development proposals by virtue of type, location, or scale that have an unacceptable impact on the natural environment will not be supported.

A3.10 Similarly, sites designated in Development Plans for local nature conservation or Special Landscape Areas (SLAs) are protected in NPF4 Policy 4 unless the development will not result in significantly adverse effects on its qualities or its integrity, or these effects are clearly outweighed by social, environmental, or economic benefits of at least local importance. The most significant policy change for Natural Places brought about by NPF Policy 4 is with regard Wild Land Areas, which states that renewable energy developments that support national targets will be supported in Wild Land Areas (WLA) and that buffer zones around WLAs will not be applied, so that effects of development out with WLAs will not be a significant consideration.

A3.11 Policy 5 Soils aims to protect carbon-rich soils, restore peatlands and minimise disturbance to soils from development. An assessment of the potential impacts of the proposed development on geology, hydrogeology and peat has been considered as part of ground investigation works completed to inform the project design and feasibility of the proposed development, alongside an assessment of alterative sites to avoid prime agricultural land. Policy 5 a) (i) states that development proposals will only be supported where they are designed and constructed in accordance with a mitigation hierarchy, by first avoiding and then minimising the amount of disturbance to soils on undeveloped land and in a manner that protects soil from damage and minimise soil sealing. Under Policy 5 b) (iv) development proposals on prime agricultural land will only be supported for the generation of energy from renewable sources where there is secure provision for restoration and the layout and design of the proposal minimises the amount of protected land that is required. Consequently, the proposal is contrary to Policy 5 a) (i) and b) (iv), in that, it has not been satisfactorily demonstrated that the siting of the development accords with the mitigation hierarchy of first avoiding and then minimising the amount of disturbance to soils on undeveloped prime agricultural land.

A3.12 Policy 6 aims to protect and expand forests, woodland and trees with significant protection offered to Ancient Woodland with a presumption against woodland removal without appropriate compensatory planting. NPF4 Policy 6 b) notes that "Development proposals will not be supported where they will result in:

i) Any loss of ancient woodlands, ancient and veteran trees, or adverse impact on their ecological condition

ii) Adverse impacts on native woodlands, hedgerows and individual trees of high biodiversity value

iii) Fragmenting or severing woodland habitats, unless appropriate mitigation measures are identified and implemented in line with the mitigation hierarchy." NPF4 Policy 6 c) notes that "Development proposals involving woodland removal will only be supported where they will achieve significant and clearly defined additional public benefits in accordance with relevant Scottish Government policy on woodland removal. Where woodland is removed, compensatory planting will most likely be expected to be delivered".

A3.13 Policy 11 intends to "encourage, promote and facilitate all forms of renewable energy development onshore and offshore. This includes energy generation, storage, new and replacement transmission and distribution infrastructure and emerging low-carbon and zero emissions technologies including hydrogen and carbon capture utilisation and storage (CCUS)". It specifies that the principle of all forms of renewable, low-carbon, and zero emission technologies is supported (with the exception of wind farm proposals located in National Parks or National Scenic Areas) including "enabling works, such as grid transmission and distribution infrastructure".

A3.14 It states that development 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 say that significant weight will be placed on the contribution of the proposal to renewable energy generation targets and on greenhouse gas emissions reduction targets, while identifying impacts, including cumulative impacts, that must be suitably addressed and mitigated against. Policy 11 e) i to xiii sets out the criteria against which applications must be assessed.

A3.15 This includes a broad range of matters similar those to be assessed under HwLDP Policy 67 including landscape and visual impacts. It advises that where impacts are localised and / or appropriate design mitigation has been applied such effects will generally be considered acceptable. While the adopted NPF4 reflects a stronger presumption in favour of all national scale energy developments, judgment is still required at the project level to ensure proposals do not have unacceptable landscape and visual impacts even if the contribution to national renewable energy targets is considerable.

A3.16 On that point it is noted that both legislation and planning law indicate that where there may be incompatibility between NPF4 and the Local Development Plan (LDP) (HwLDP, IMFLDP2, and Highland Council Supplementary Guidance) published prior to NPF4, then the more recent document shall prevail. Notwithstanding however, in instances of incompatibility, this requirement may not eliminate the provisions of the LDP in their entirety whilst these documents remain an extant part of the adopted Development Plan. That means that the Council may wish to still give considerable weight to the provisions of its LDP over national policies where there is strong justification for doing so, such as where the Council feels that LDP policy is better equipped to respond to local matters of importance or site-specific conditions for example.

A3.17 The proposed development triggers, in particular, consideration of Policy 11 Energy. This presumes in favour of battery storage proposals outwith protected areas subject to 13 site-specific design and mitigation criteria listed in Policy 11e). Policies 1 to 3 are also relevant in terms of supporting proposals that address climate change but also enhance biodiversity and the nature crisis. Policies 14 (Design, quality and place), 18 (Infrastructure first), 20 (Blue and green infrastructure), 22 Flood risk and water management), 23 (Health and safety) and 25 (Community wealth building) are also relevant.

A3.18 Given the nature of BESS and the requirement for adequate water supply in case of fire, the proposed development has potential to have a significant impact on hydrology, the water environment and flood risk. However, various mitigation measures will minimise any significant adverse effects.

A3.19 Additionally, whilst the generality of HwLDP's topic policies are superseded by those in NPF4 HwLDP policies that offer greater detail than NPF4 or that are tailored to Highland circumstance (and are not wholly incompatible with NPF4) are still relevant and may be applicable. In particular, Policy 57 Natural, Built and Cultural Heritage and Policy 61 – Landscape and Policy 67 Renewable Energy.

A3.20 It is considered the proposal is in overall conformity with Policy 57, Policy 61 and Policy 67 of HwLDP. Policy 57 requires all development proposals be assessed taking into account the level of importance and type of heritage features, the form and scale of the development, and any impact on the feature and its setting. The following criteria will also apply:

- For features of local/regional importance development will be allowed if it can be satisfactorily demonstrated that they will not have an unacceptable impact on the natural environment, amenity and heritage resource; and
- For features of national importance development will be allowed if it can be shown not to compromise the natural environment, amenity and heritage resource. Where there may be any significant adverse effects, these must be clearly outweighed by social or economic benefits of national importance. It must also be shown that the development will support communities in fragile areas who are having difficulties in keeping their population and services.

A3.21 In terms of Policy 67, whilst the proposed development would contribute towards meeting renewable energy generation targets and generally have a positive effect on the local and national economy the Council has to be satisfied that it is located, sited and designed not to be significantly detrimental overall, either individually or cumulatively with other developments, having regard in particular to any significant effects on the following:

- Natural, built and cultural heritage features;
- Visual impact and impact on the landscape character of the surrounding area (the design and location of the proposal should reflect the scale and character of the landscape and seek to minimise landscape and visual impact, subject to any other considerations);

- Amenity at sensitive locations, including residential properties, work places and recognised visitor sites (in or outwith a settlement boundary); and
- The amenity of users of any Core Path or other established public access for walking, cycling or horse riding;

Highland-wide Local Development Plan (HwLDP)

A3.22 The generality of the HwLDP's topic policies are superseded by those in NPF4. However, those that offer greater detail than NPF4 or that are tailored to Highland circumstance (and are not wholly incompatible with NPF4) are still relevant and may be applicable.

A3.23 HwLDP Policy 55 - Peat and Soils notes that development proposals should demonstrate how they have avoided unnecessary disturbance, degradation or erosion of peat and soils. Consequently, the proposal is contrary to Policy 55, in that it has not been satisfactorily demonstrated that the siting of the development accords with the mitigation hierarchy of first avoiding and then minimising the amount of disturbance to soils on undeveloped prime agricultural land.

A3.24 HwLDP Policy 57 – Natural, Built and Cultural Heritage requires all development proposals be assessed taking into account the level of importance and type of heritage features, the form and scale of the development, and any impact on the feature and its setting.

A3.25 HwLDP Policy 67 - Renewable Energy sets out that "renewable energy development should be well related to the source of the primary renewable resource needed for operation". It states that "The Council will consider the contribution of the proposed development in meeting renewable energy targets and positive/negative effects on the local and national economy as well as all other relevant policies of the Development Plan and other relevant guidance". The Council will support proposals where it is satisfied, they are located, sited and designed such as they will not be significantly detrimental overall, individually or cumulatively with other developments against eleven specified criteria (as listed in HwLDP Policy 67). Such an approach is consistent with the concept of Sustainable Design (HwLDP Policy 28) and the concept of supporting the right development in the right place at the right time. Consequently, the proposal is contrary to Policy 67 in that, it has not been satisfactorily demonstrated that the siting of the development accords with the mitigation hierarchy of first avoiding and then minimising the amount of disturbance to soils on undeveloped prime agricultural land.

A3.26 Policy 69 – Electricity Transmission Infrastructure states that proposals for overground, underground or sub-sea electricity transmission infrastructure (including lines and cables, pylons/ poles and vaults, transformers, switches and other plant) will be considered having regard to their level of strategic significance in transmitting electricity from areas of generation to areas of consumption". Subject to balancing with this consideration, and taking into account any proposed mitigation measures, the Council will support proposals which are assessed as not having an unacceptable significant impact on the

environment, including natural, built and cultural heritage features.

A3.27 Although HwLDP Policy 67 and Policy 69 are considered compatible with NPF4 Policy 11, NPF4 expresses greater support for renewable energy projects outwith National Parks and NSAs and requires greater weight to be attributed to the twin climate and biodiversity crises in the decision-making process, whilst still recognising that a balancing exercise must still be carried out.

Area Local Development Plan: The Inner Moray Firth Local Development Plan 2 (IMFLDP2)

A3.28 The proposed development lies outwith any allocated site, delineated settlement boundary and safeguarding notation. The Inner Moray Firth Local Development Plan 2 (IMFLDP2) was adopted on 27 June 2024 and now postdates NPF4. Although the IMFLDP2 does not contain any site-specific policies relevant to this proposal its general policies provide more detail than the equivalent ones in NPF4. In particular, Policy 2 Nature Protection, Restoration and Enhancement which provides the hook for the Council's Biodiversity Enhancement Planning Guidance and Policy 9 Delivering Development and Infrastructure set out more detail.

A3.29 The IMFLDP contains policy on Nature Protection, Preservation and Enhancement (Policy 2). This sets out that proposals for national, major and EIA development will only be supported where it is demonstrated that the proposal will conserve and enhance biodiversity, including nature networks within and adjacent to the site, so that they are in a demonstrably better state than without intervention, including through future management. This is similar to the approach taken in NPF4 and will be considered in the relevant sections of this report.

A3.30 The IMFLDP also sets out that developers will be required to demonstrate that adequate capacity to serve the proposal exists or can be created by a programmed improvement or via direct developer provision or funding. Where this is appropriate, the need for enhancements to infrastructure will be highlighted in this report.

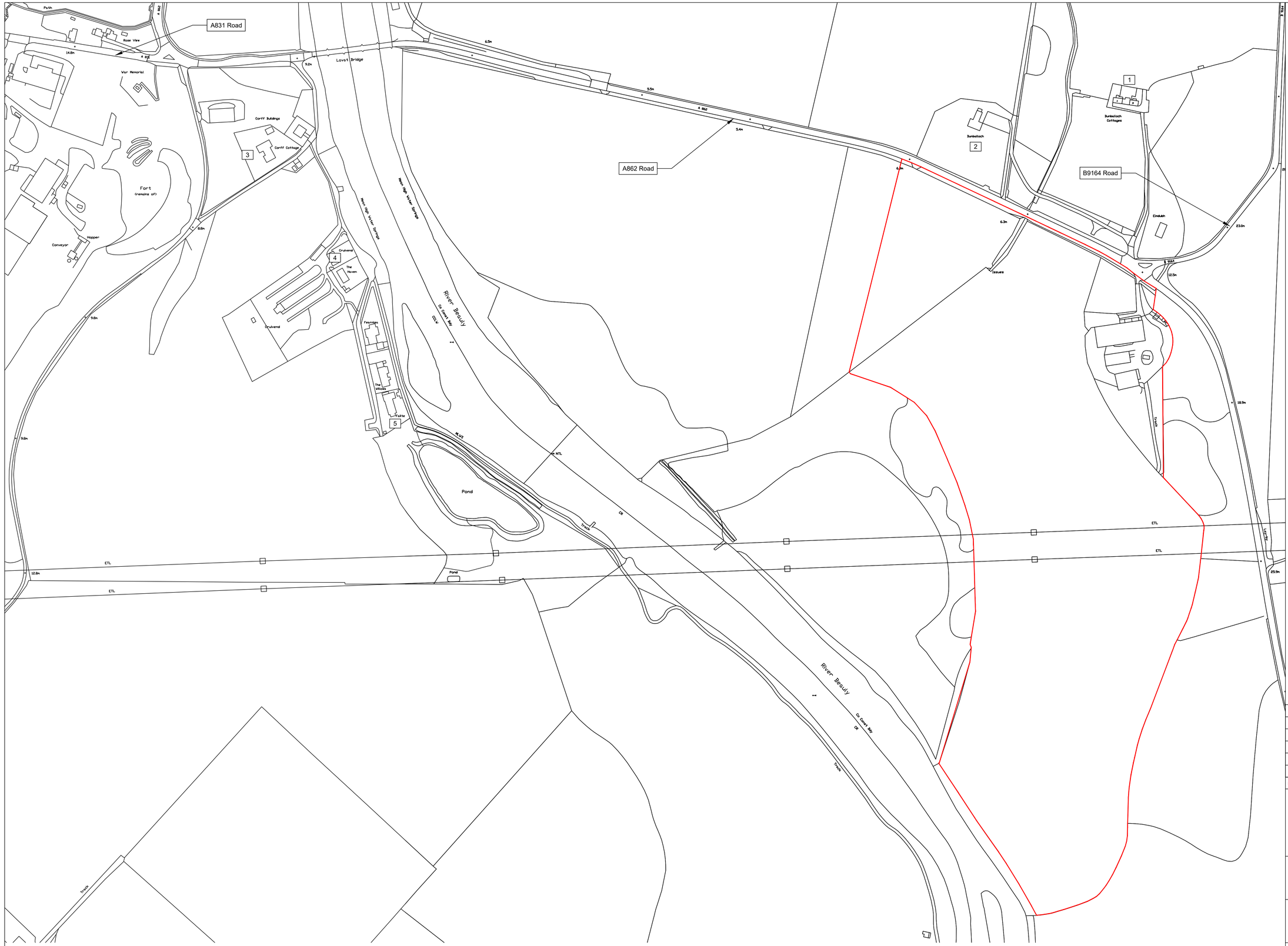
Draft Energy Strategy and Just Transition Plan (2023)

A3.31 Overall, the draft Energy Strategy forms part of the new policy approach alongside NPF4 and confirms the Scottish Government's policy objectives and related targets reaffirming the crucial role that BESS and enabling transmission infrastructure will play in response to the climate crisis which is at the heart of all these policies.

Scottish Government Planning Guidance: Battery Energy Storage Systems (2026)

A3.32 The planning guidance has been prepared on behalf of Scottish Government with input from industry, planning authorities, NatureScot, Scottish Environment Protection Agency (SEPA) and the Scottish Fire and Rescue Service (SFRS). The core purpose of the guidance is to assist applicants, decisionmakers, and

other participants in the planning system to effectively plan for BESS across Scotland. The guidance supports a clearer understanding of the specific technical, environmental, and wider issues associated with planning for BESS, and how these may be positively addressed through the planning process, to ensure that development is appropriately sited, well designed, and responsive to its context. Most specifically for this application, the guidance sets out that where BESS development is proposed on peatland, carbon-rich soil, priority peatland habitat, or prime agricultural land, applicants should provide evidence of specific locational need and that there is no other suitable site, which may include robust evidence demonstrating consideration of alternatives.



1 Site Location Plan
Scale 1:2,000 @ A1

Drawing Notes:

1. All dimensions are shown in metres unless noted otherwise.
2. Do not scale from this drawing.
3. Planning boundary area: 18.504Ha

Legend:

Planning Boundary

List of Addresses	
1	1-3 Dunballoch Cottages, Beauly, IV47AY
2	Dunballoch Farm, Beauly, IV4 7AY
3	Corff House, Cruivend, Beauly, IV4 7BE
4	Cruivend House, Cruivend, Beauly, IV4 7BE
5	Failte, Cruivend, Beauly, IV4 7BE

REV	DATE	DESCRIPTION	BY	CHK'D
0	16/12/2024	SITE LOCATION PLAN - ORIGINAL	WL	JH

Field
Fora - Montacute Yards
186 Shoreditch High Street
London
E1 6HU

PROJECT
BEAULY

TITLE
Site Location Plan

DISCIPLINE
PLANNING

DRAWING STATUS
FOR PLANNING

SCALE	DATE	DRAWN BY	CHECKED BY	APPROVED BY
1:2,000 @A1	16/12/2024	WL	JH	ED

PROJECT NO.	DRAWING NO.	REV.
BTGBBEA02	002.1	00

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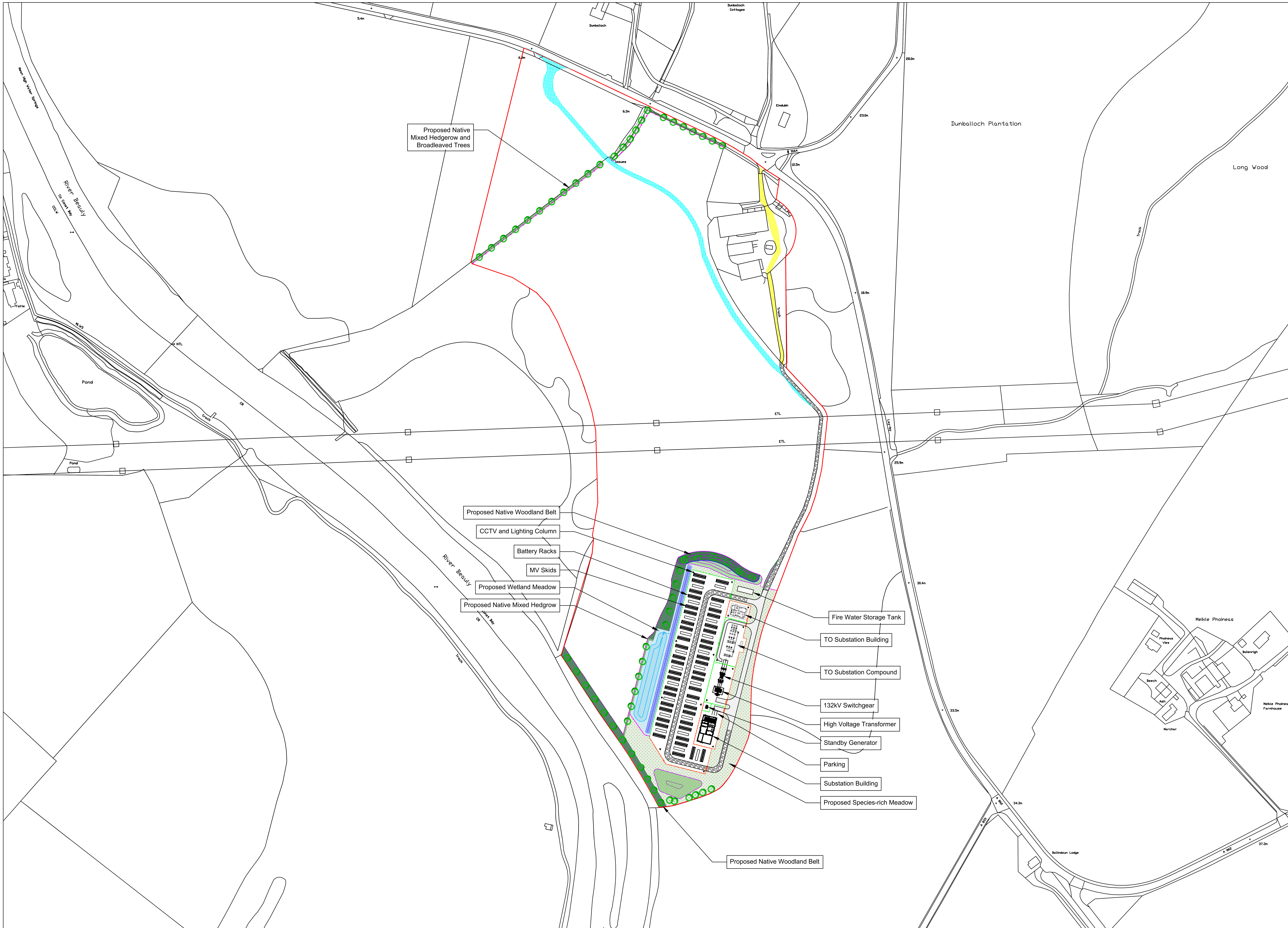
1:200	5m	10m	15m	20m						
1:250	5m	10m	15m	20m	25m					
1:500	10m	20m	30m	40m	50m					
1:1000	10m	20m	30m	40m	50m	60m	70m	80m	90m	100m
1:2000	50m	100m	150m	200m	250m					
1:2500	50m	100m	150m	200m	250m					
1:5000	100m	200m	300m	400m	500m					



Drawing Notes:

1. All dimensions are shown in metres unless noted otherwise.
2. Do not scale from this drawing.

Legend:

- Planning Boundary
- 3m Palisade Fencing with Electric Topper
- Fire Proof 4m Acoustic Fencing
- Stock Proof Fencing
- Access Road - Type 1 Aggregate Finish
- Access Road - Asphalt Finish
- Access Road from Highways
- Infiltration Basin
- Temporary Construction Access
- Passing Places
- Bunding
- Attenuation Basin
- Surface Water Drain
- Surface Water Manhole
- Proposed Native Woodland Belt
- Proposed Species-rich Meadow
- Proposed Native Mixed Hedgerow
- Proposed Wetland Meadow
- Proposed Native Broadleaved Tree

REV	DATE	DESCRIPTION	BY	CHK'D
8	08/01/2025	LANDSCAPING AMENDED	WL	EG
7	06/01/2025	LANDSCAPING PLAN AND LABELS AMENDED	WL	EG
6	30/10/2025	CONSTRUCTION ACCESS AND INDICATIVE PLANTING CORRIDOR AMENDED. RIVER BANK BUFFER REMOVED.	WL	EG
5	14/07/2025	DIMENSIONS, TOP OF RIVER BANK AND TOP OF RIVER BANK BUFFER ADDED. LAYOUT AMENDED TO SUIT. LANDSCAPING AND LEGEND AMENDED	WL	EH
4	16/12/2024	LAYOUT AND LANDSCAPING PLAN AMENDED	WL	JH
3	05/12/2024	AREA OF NATIVE HEDGEROW ADDED IN THE NORTH	JH	ED
2	03/12/2024	LANDSCAPING AREA AMENDED	JH	ED
1	28/11/2024	LANDSCAPING PLAN AMENDED	JH	ED
0	20/11/2024	INDICATIVE SITE LAYOUT PLAN - ORIGINAL	WL	JH

Field
Fora - Montacute Yards
186 Shoreditch High Street
London
E1 6HU

PROJECT
BEAULY

TITLE
Indicative Site Layout Plan

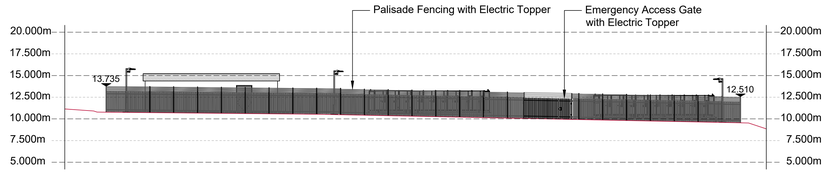
DISCIPLINE
PLANNING

DRAWING STATUS
FOR PLANNING

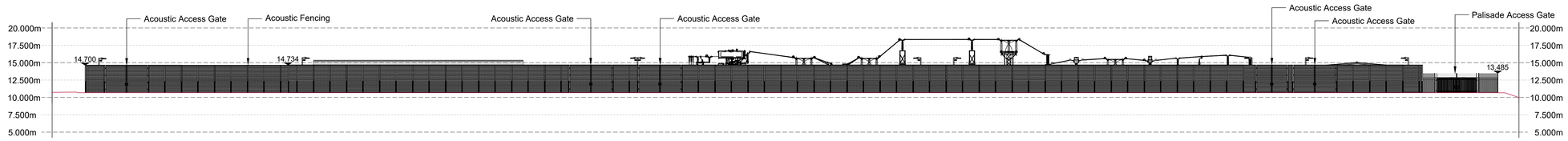
SCALE	DATE	DRAWN BY	CHECKED BY	APPROVED BY
1:2000 @A1	20/11/2024	WL	JH	ED

PROJECT NO. BTGBBEA02
DRAWING NO. 001.1
REV. 08

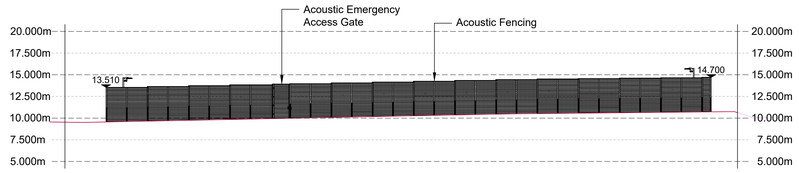
1 Indicative Site Layout Plan
Scale 1:2000 @ A1



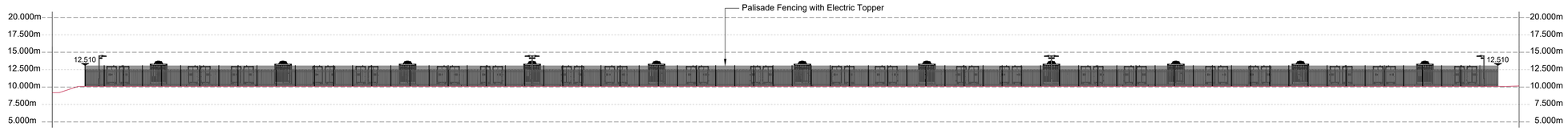
1 North Elevation complete with Fencing
Scale 1:250 @ A0



2 East Elevation complete with Fencing
Scale 1:250 @ A0



3 South Elevation complete with Fencing
Scale 1:250 @ A0



4 West Elevation complete with Fencing
Scale 1:250 @ A0

5 Site Plan
Scale 1:1000 @ A0

Drawing Notes:

1. All dimensions are shown in metres unless noted otherwise.
2. Do not scale from this drawing.
3. Levels are metres above ordnance datum (AOD)
4. For detail on equipment levels, refer to 005.5 - Site Elevations without Fencing

Legend:

Finished Floor Level

1:10	0	100mm 200mm 300mm 400mm 500mm 600mm 700mm 800mm 900mm		1m
1:20		0.5m	1m	2m
1:25		0.5mm 1m 1.5m 2m		2.5m
1:50		1m 2m 3m 4m		5m
1:100		1m 2m 3m 4m 5m 6m 7m 8m 9m		10m
1:200		5m 10m 15m		20m
1:250		5m 10m 15m 20m		25m
1:500		10m 20m 30m 40m		50m
1:1000	0	10m 20m 30m 40m 50m 60m 70m 80m 90m		100m

REV	DATE	DESCRIPTION	BY	CHK'D
01	16/12/2024	SITE LAYOUT AND LABELING AMENDED	WL	JH
0	19/11/2024	SITE ELEVATION COMPLETE WITH FENCING - ORIGINAL	WL	JH

Field
Fora - Montacute Yards
186 Shoreditch High Street
London
E1 6HU

PROJECT
BEAULY

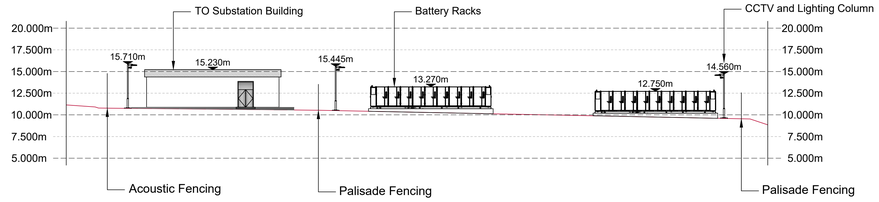
TITLE
SITE ELEVATIONS
COMPLETE WITH FENCING

DISCIPLINE
DESIGN

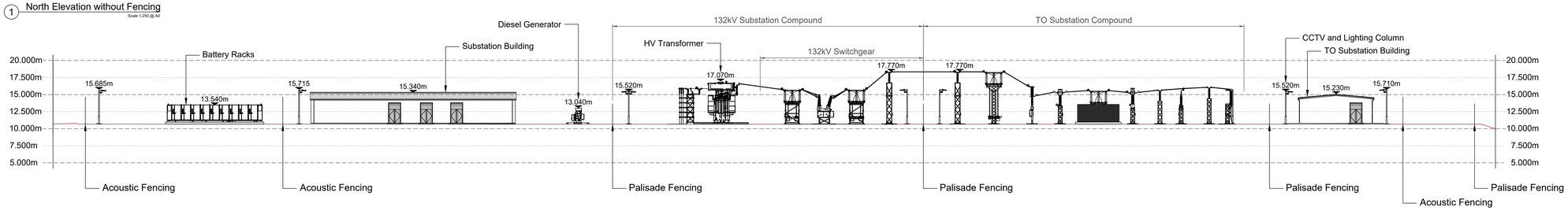
DRAWING STATUS
FOR INFORMATION

SCALE	DATE	DRAWN BY	CHECKED BY	APPROVED BY
As Shown @ A0	19/11/2024	WL	JH	ED

PROJECT NO.	DRAWING NO.	REV.
BTGBBEA02	005.4	01

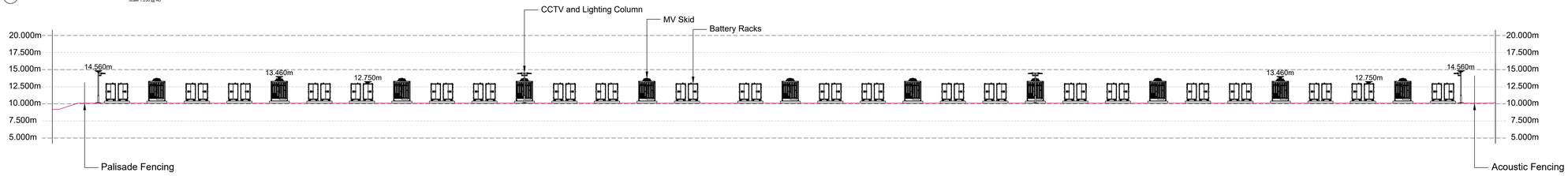


1 North Elevation without Fencing
Scale 1:250 @ A0



2 East Elevation without Fencing
Scale 1:250 @ A0

3 South Elevation without Fencing
Scale 1:250 @ A0



4 West Elevation without Fencing
Scale 1:250 @ A0

5 Site Plan
Scale 1:1000 @ A0

Drawing Notes:

1. All dimensions are shown in metres unless noted otherwise.
2. Do not scale from this drawing.
3. Levels are metres above ordnance datum (AOD)

Legend:

Finished Floor Level

01	16/12/2024	SITE LAYOUT AND LABELING AMENDED	WL	JH
0	19/11/2024	SITE ELEVATION WITHOUT FENCING - ORIGINAL	WL	JH
REV	DATE	DESCRIPTION	BY	CHK'D

Field
Fora - Montacute Yards
186 Shoreditch High Street
London
E1 6HU

PROJECT
BEAULY

TITLE
SITE ELEVATIONS
WITHOUT FENCING

DISCIPLINE
PLANNING

DRAWING STATUS
FOR PLANNING

SCALE	DATE	DRAWN BY	CHECKED BY	APPROVED BY
As Shown @ A1	19/11/2024	WL	JH	ED

PROJECT NO.	DRAWING NO.	REV.
BTGBBEA02	005.5	01