

Agenda Item	6.7
Report No	PLS/52/26

HIGHLAND COUNCIL

Committee: South Planning Applications Committee

Date: 6 August 2026

Report Title: 25/03436/S42: Whirlwind Energy Storage Limited
Land 300M SE of Househill House, Househill, Nairn

Report By: Area Planning Manager (South)

Purpose/Executive Summary

Description: Section 42 application to vary condition 1 (time limit on commencement) of planning consent 22/03638/FUL for the construction and operation of a battery energy storage facility.

Ward: 18 – Nairn and Cawdor

Development category: Major

Reason referred to Committee: Major Development and Community Council Objection

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

Recommendation

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

1. PROPOSED DEVELOPMENT

1.1 This application has been submitted under Section 42 of the Town and Country Planning (Scotland) Act 1997 (as amended). It seeks permission to develop land without compliance with Condition 1 of the existing planning consent for the Househill Battery Energy Storage System (Highland Council ref. 22/03638/FUL), granted on 17 February 2023.

1.2 Condition 1 (Time Limit for Implementation) reads:

“The development to which this Planning Permission relates must commence within THREE YEARS of the date of this decision notice. If development has not commenced within this period, then this Planning Permission shall lapse.”

The extant consent required the permission to be implemented by 17 February 2026. The applicant has requested a further 1-year implementation period from this date to extend the permission until 17 February 2027.

1.3 In support of the request the applicant notes that Battery Energy Storage projects are complex and rely on a number of external factors, including the timing of grid connections, ongoing regulatory reforms, equipment supply, and funding. The applicant has been progressing the Househill project for several years, during which time a grid connection was secured with an energisation date of 2027 due to required wider network upgrades. Although it was initially anticipated that this date might be brought forward to align with the original three-year consent period, this has not occurred. The project is therefore now working towards a 2027 connection date, with construction expected to commence in late 2026. An extension of the implementation period from three, to four years, to February 2027, is accordingly sought to align the planning consent with this revised programme.

1.4 Househill Battery Energy Storage System was granted by the South Planning Applications Committee in 2023 subject to 18 conditions. The consented development for an energy storage facility capable of storing up to 49.9MW of electricity comprised:

- Circa 50 battery storage containers with indicative plans showing raised units measuring 12.2m x 2.4m, with a maximum height of 3.5m from the ground, each with integrated air conditioning units and external inverter. The containers will be arranged in pairs with each pair sharing a small transformer. The overall length of this arrangement is 20.3m;
- Control building housing switching and electrical gear, with Sedum Roof measuring 18m x 6.5m x 2.84m max;
- Site office container (12.2m x 2.44m x 3.3m max);
- 2.78m high security fencing and wooden acoustic barrier fencing;
- 4 x CCTV masts with cameras measuring 3.1m max;
- Landscaping;
- Area of hardstanding;
- Parking for 3no cars;
- A new access track and access junction with the A939(T); and
- Surface water drainage system.

- 1.5 The proposed development is intended to store surplus electricity from the national grid and release it during peak demand. It will connect to the grid via the existing Nairn substation, about 650 m northeast of the application site on Granny Barbour's Road. The connection is expected to use underground cables, though the exact route and method are not yet finalised. Underground cabling may fall under permitted development rights if installed by a statutory undertaker, while any overhead lines would require a separate application under Section 37 of the Electricity Act 1989, subject to further consultation with the Highland Council.
- 1.6 Applications made under Section 42 of the Act cannot alter the fundamental nature or description of the development; they are limited to varying, removing or adding conditions attached to an existing permission. A permission granted under Section 42 effectively creates a new Planning Permission with revised conditions, while the remainder of the original consent remains unchanged.
- 1.7 Accordingly, the principle of development and the main elements of the scheme are already established by the extant consent and cannot be revisited through this Section 42 application. However, the proposal can be reviewed against the current policy and guidance framework and planning conditions revised accordingly.
- 1.8 No pre-application advice has been given in relation to this S42 application. Formal pre-application advice was given through the Council's Pre-application Consultation Service for Major Developments (21/05287/PREMAJ) prior to submission of the original planning application 22/03638/FUL.
- 1.9 Supporting Information: Outline Battery Safety Management Plan; Drainage Report; Supporting Statement; Landscape Management Plan; Biodiversity Net Gain Report; Pre-Construction Report and Species Protection Plans
- 1.10 Variations: Revisions to layout

2. SITE DESCRIPTION

- 2.1 The application site extends to approximately 2.3 ha of agricultural land, of which around 0.6 ha would be developed for the proposed facility and associated infrastructure. The remaining areas would incorporate landscaping to provide screening. The site is located approximately 1.7 km southeast of Nairn town centre and around 200 m southwest of Househill. It lies within the Coastal Farmlands – Moray and Nairn Landscape Character Type (LCT 28), as identified by NatureScot, on the southwest side of the A939, from which access is taken. The surrounding landscape is characterised by relatively flat, open countryside, interspersed with woodland and forestry, small clusters of housing associated with the outskirts of Nairn, and more dispersed farmsteads and rural businesses, with settlement density decreasing further from the town.
- 2.2 The site lies outwith, but directly adjacent to, the Nairn Settlement Development Area boundary. It is bounded by the A939 to the northeast, woodland comprising mixed broadleaf and conifer trees to the east and south, and open farmland to the west. The Househill housing cluster is located approximately 300 m to the northwest, beyond intervening woodland, with additional properties to the north on the opposite side of the public road, including a farmstead with café and a separate agricultural

business. Major overhead electricity lines run to the east of the site on a northeast–southwest alignment. Ground levels across the site rise gently towards the west.

- 2.3 There are no landscape or natural heritage designations affecting the site. However, three Sites of Special Scientific Interest (SSSIs) are located within 5 km: Kildrummie Kames SSSI (approximately 2 km southwest), designated for its fen, loch, juniper habitats and geological features; Culbin Sands, Culbin Forest and Findhorn Bay SSSI (approximately 3.7 km northeast), designated for coastal geomorphology and habitats; and Whiteness Head SSSI (within 5 km), designated for coastal geomorphology, bird interests, intertidal habitats, saltmarsh, sand dunes and shingle. The site is also located approximately 2 km south of the Moray Coast Special Protection Area (SPA) and Special Area of Conservation (SAC), designated for wintering birds and breeding osprey. The proposed development is not considered likely to give rise to impacts on these designated sites.

3. PLANNING HISTORY

- | | | | |
|-----|-------------|--|--------------------|
| 3.1 | 14 Feb 2022 | 21/06018/PAN: Battery Energy Storage Facility comprising up to 50 energy storage containers with a total storage capacity of 49.9MW, control building, transformers, switchgear and ancillary infrastructure. | Closed |
| 3.2 | 17 Feb 2023 | 22/03638/FUL: Construction and operation of a battery energy storage facility consisting of up to 50 containerised battery storage units, ancillary transformers and inverters, connection building, site office and store, fencing and landscaping. | Permission granted |

4. PUBLIC PARTICIPATION

- 4.1 Advertised: Unknown Neighbour and Schedule 3
Date Advertised: 14.10.25 and 04.11.2025;
Representation deadline: 28.10.25 and 21.11.2025

Timeous representations: 0 representations

Late representations: 1 representation
- 4.2 Material considerations raised are summarised as follows:
- a) Original layout does not conform with National Fire Chiefs Council Guidance – e.g. entrance and fire water
 - b) No mention of MWh storage capacity which is critical to safety and environmental risk
 - c) Development must comply with present day good practice
- 4.3 All letters of representation are available for inspection via the Council's eplanning portal which can be accessed through the internet www.wam.highland.gov.uk/wam.

5. CONSULTATIONS

- 5.1 **Nairn River Community Council: Object.** Argue that Whirlwind Energy Storage Ltd knowingly took a risk by submitting the proposal despite having a grid connection date beyond the standard three-year consent period. The developer gambled on the date being brought forward to secure an early position in the connection queue, and this gamble has failed; therefore, the project should no longer proceed.

The Community Council also contends that lithium battery technology is now outdated, poses environmental risks, and creates elevated fire hazards with potentially serious local impacts. Call on Highland Council to halt further lithium battery storage developments and instead prioritise safer, more advanced alternatives through clear policy and guidance. Reference is made to Ireland's approach in limiting lithium batteries to protect the environment, which they argue the Highlands should emulate.

For any applications seeking extensions beyond the standard consent period, the Community Council insists that developers should be required to adopt the most environmentally friendly and safest technology available at the time of application. Meeting this requirement should be a prerequisite for consideration, not a guarantee of approval.

Finally, the Community Council requests that their objections be presented to SPAC members and considered as part of the decision-making process.

- 5.2 **Flood Risk Management:** No comment to make on the application.
- 5.3 **Transport Planning:** Planning Permission 22/03638/FUL for a Battery Energy Storage Facility was granted on 17 February 2023. The proposed access to the site makes use of an existing field gate onto the A939 in the vicinity of the existing Househill commercial facility. This remains unaffected by the current Section 42 application, which seeks to amend Condition 1 to extend the time limit for commencement from three years to four years, citing grid connection delays and a revised energisation date of 2027. No physical changes to the approved development are proposed. The proposed variation relates solely to the duration of the planning consent and does not alter the approved layout, access arrangements, or transport-related conditions. Accordingly, we have no objection to the requested amendment subject to all previously recommended transport-related conditions remaining in force.
- 5.4 **Forestry:** No objection to the proposal to vary condition 1.
- 5.5 **Access Officer:** No comment to make on the application.
- 5.6 **Community Wealth Building Team:** The application has been logged and the CWBT will be in touch with the Developer/Applicant regarding the Highland Social Value Charter
- 5.7 **Environmental Health:** No objection. The applicant proposes separate daytime (33 dB) and night-time (26 dB) noise limits for the BESS development, which is considered reasonable given lower cooling-related noise emissions at night. A revised Noise Impact Assessment (Inacoustic, July 2026) predicts operational noise

levels of 32 dB during the day and 24 dB at night, both below the agreed limits. Environmental Health is satisfied that the revised conditions will adequately protect nearby residents and supports the proposed variation.

- 5.8 **Ecology Team:** Satisfied that the submitted Biodiversity Net Gain Report is satisfactory, with habitat enhancements and monitoring appropriate for the development
- 5.9 **Archaeology:** No comment.
- 5.10 **Contaminated Land:** No comment
- 5.11 **Transport Scotland:** Do not propose to advise against the granting of permission.
- 5.12 **Scottish Water:** No objection
- 5.13 **SEPA:** Based on the information provided, it appears that this application falls below the thresholds for which SEPA provides site specific advice. Please refer to our development management consultation thresholds and standing advice, which is available on our website.
- 5.14 **Historic Environment Scotland:** We have no locus in this particular case.

6. DEVELOPMENT PLAN POLICY

The following policies are relevant to the assessment of the application

- 6.1 **National Planning Framework 4 (2023) (NPF4)**
 - Policy 1 - Tackling the Climate and Nature Crises
 - Policy 2 - Climate Mitigation and Adaptation
 - Policy 3 - Biodiversity
 - Policy 4 - Natural Places
 - Policy 5 - Soils
 - Policy 6 - Forestry, Woodland and Trees
 - Policy 7 - Historic Assets and Places
 - Policy 11 - Energy
 - Policy 13 - Sustainable Transport
 - Policy 22 - Flood Risk and Water Management
 - Policy 23 - Health and Safety
 - Policy 25 - Community Wealth Building
- 6.2 **Highland Wide Local Development Plan 2012 (HwLDP)**
 - 28 - Sustainable Design
 - 29 - Design Quality and Place-making
 - 30 - Physical Constraints
 - 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
- 61 - Landscape
- 64 - Flood Risk
- 66 - Surface Water Drainage
- 67 - Renewable Energy Developments
- 69 - Electricity Transmission Infrastructure
- 70 - Waste Management Facilities
- 72 - Pollution
- 73 - Air Quality
- 74 - Green Networks

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

The IMFLDP2 includes several overarching 'general policies' that apply to all developments which are:

Policy 1 – Low Carbon Development

Policy 2 – Nature Protection, Preservation, and Enhancement

6.4 Highland Council Supplementary Planning Policy Guidance

Biodiversity Enhancement Planning Guidance (May 2024)

Developer Contributions (Mar 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)

Highland Renewable Energy Strategy and Planning Guidelines (May 2006)

Physical Constraints (Mar 2013)

Roads and Transport Guidelines for New Developments (May 2013)

Special Landscape Area Citations (Jun 2011)

Sustainable Design Guide (Jan 2013)

7. Other National Legislation, Policy and Guidance

Onshore Wind Policy Statement (Dec 2022)

Scottish Energy Strategy (2017)

Draft Energy Strategy and Just Transition Plan (2023)

2020 Routemap for Renewable Energy (Jun 2011)

Energy Efficient Scotland Route Map (May 2018)

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

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

Grid Scale Battery Energy Storage System Planning – Guidance for Fire and Rescue Service (NFCC) (December 2025)

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

8. PLANNING APPRAISAL

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

Determining Issues

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

Planning Considerations

- 8.3 The key considerations in this case are:
- a) compliance with the development plan and other planning policy
 - b) any other material considerations

Development plan/other planning policy

- 8.4 Whilst the policies set out in Section 6 are of relevance to the development as a whole, the principle of the development has already been established through Planning Permission 22/03638/FUL. However, since the application was considered by Committee in February 2023, the Development Plan has been updated with the adoption of National Planning Framework 4 (2023) and the Inner Moray Firth Local Development Plan 2 (2024).
- 8.5 Although the policy framework at both national and local levels has evolved, the overall position on battery energy storage remains supportive. NPF4 emphasises the need to address climate change, reduce greenhouse gas emissions, and support the transition to a net zero economy, while safeguarding environmental assets and delivering sustainable development. In this context, battery energy storage forms part of strategic renewable electricity infrastructure that supports these objectives.
- 8.6 The key NPF4 policy for energy developments is Policy 11, which provides in-principle support for renewable, low-carbon and zero-emission technologies, including Battery Energy Storage Systems (BESS). This support is qualified by requirements to maximise socio-economic benefits, such as employment and supply chain opportunities, and to address and mitigate impacts, including cumulative effects, on communities, amenity, landscape, historic environment, ecology, water, site restoration and other relevant considerations. The Inner Moray Firth Local Development Plan 2 does not contain any specific land allocations related to the proposed type of development.
- 8.7 The Scottish Government's Draft Energy Strategy and Just Transition Plan (2023) recognises that Battery Energy Storage Systems can increase flexibility within the

electricity system and deliver wider benefits for consumers and society. This and the policies set out within NPF4 confirm the Scottish Government's commitment to renewable energy and associated enabling transmission infrastructure as being crucial to addressing the climate crisis.

- 8.8 The proposal is therefore considered to remain acceptable in principle and in general conformity with the Development Plan.

Other material considerations

- 8.9 Section 42 of the Act requires the Planning Authority to consider only the question of the conditions subject to which Planning Permission should be granted. If it is determined that Planning Permission should be granted subject to different conditions, it should be granted accordingly, and if it is determined that permission should be granted subject to the same conditions, the Planning Authority is obliged to refuse the application.
- 8.10 The Section 42 process does not permit amendments to the originally approved development; rather, it allows only for changes to the conditions attached to that permission. However, it does enable the Planning Authority to reconsider all conditions under which Planning Permission could be granted, not solely those the applicant has proposed to vary.
- 8.11 In this instance, there have been significant changes to both national and local planning policy since permission 22/03638/FUL was granted. In addition, more recent guidance has been published by the National Fire Chiefs Council (NFCC) and the Scottish Government in relation to BESS developments. Accordingly, the Planning Authority has taken the opportunity to reassess the development against current policy and guidance. As a result, it is recommended that a number of new planning conditions be added, and that certain existing conditions be amended, in order to ensure the development complies with the latest policy and best practice.
- 8.12 It is important to note that, while the applicant has submitted updated drawings and supporting information to demonstrate that the matters raised can be satisfactorily addressed, these drawings cannot be formally approved as part of this Section 42 application. Instead, the relevant matters will be controlled through the imposition of new or revised pre-commencement planning conditions. These conditions must be discharged by the applicant prior to the commencement of any works on site. This approach allows the Planning Authority to update and refine the existing permission so that it reflects current best practice and policy requirements, while remaining within the procedural constraints of the Section 42 process. The following matters have been identified as requiring to be updated as a result of new policies and guidance:
- 8.13 **Site Access:** The most up-to-date NFCC guidance recommends the provision of an alternative means of access into Battery Energy Storage System sites. This is to ensure that fire and rescue personnel are not required to enter a site through a vapour or gas cloud in order to reach a fire, depending on wind direction. Where a secondary point of access cannot be achieved, an alternative 'loop' arrangement of vehicle access around the site may be considered acceptable. In this instance, the previously approved development includes a single point of access, taken from the

A939, which enters the operational area from a single direction and does not loop around the site. This arrangement would not meet current NFCC guidelines. As this proposal is submitted under Section 42, the red line application boundary cannot be altered; therefore, any amendments to the access arrangements must be accommodated within the existing site boundary.

- 8.14 To demonstrate that NFCC guidance can be met, the applicant has submitted a revised access arrangement, illustrated on the Indicative Site Layout Plan. The proposal retains the primary access from the A939, which runs along the western boundary of the site before entering the operational area from the west. This access then forms part of a circular internal route extending around the northern part of the site and through the centre of the operational area. In addition, a secondary emergency-only access is proposed from a point close to the junction with the A939. This route would run along the eastern boundary of the site before connecting to the circular access road from the east.
- 8.15 This revised arrangement would accord with NFCC guidance by providing two separate points of access for emergency vehicles. As a result, emergency services would be able to reach the site from alternative directions should visibility or access be compromised. An amended planning condition requires details of the site access, to include either dual access or a perimeter access to be agreed prior to development commencing, ensuring that the access will accord with the relevant policies and guidance in force at the time of implementation.
- 8.16 The indicative site layout submitted with this application has been redesigned to incorporate the latest BESS technology and, as such, differs from the approved scheme. This has resulted in a notably reduced development footprint (approximately 40% smaller), comprising 36 battery storage and inverter units housed within containers. These would be arranged in nine groups of five units, alongside associated ancillary infrastructure.
- 8.17 Given the fast-moving pace of technology in this sector, it is acknowledged that the final layout will ultimately be influenced by the specifications of the battery units selected for installation. The submitted layout indicates a spacing of 6 metres between battery units, which aligns with the minimum separation distance set out in the previous iteration of NFCC guidance. However, the updated guidance advises that, depending on the battery type employed, reduced separation distances may be acceptable. It is important to note that the indicative Site Layout cannot be approved as part of this S42 application, and that the final layout and battery specification is secured by planning condition. This approach ensures that the development can take full account of the most up-to-date technology and relevant guidance at the time of implementation.
- 8.18 **Drainage and Firewater Drainage:** The drainage strategy approved under 22/03638/FUL is for a private infiltration-based SUDS strategy for surface water drainage using porous drains; an infiltration basin and porous hardstanding. Since this application was granted our understanding of the potential issues surrounding BESS developments has evolved and an infiltration strategy such as the one which was approved under 22/03638/FUL is no longer acceptable. This is because any firefighting runoff would potentially be contaminated and should not enter the environment and nearby watercourses. An alternative drainage strategy has

therefore been submitted by the applicant to demonstrate that the site can be drained in such a manner that takes account of any fire runoff.

- 8.19 The proposed strategy is for all surface water from the hardstanding operational area to discharge to an appropriately sized SuDS basin which also functions as a firewater containment basin, before passing to an infiltration basin where it soaks into the ground. A key component of the strategy is the combined attenuation and fire containment basin, which is fully lined to prevent pollution entering groundwater. It includes a flow control chamber and penstock (shut-off valve) that can be closed in the event of a fire, ensuring that potentially contaminated firewater is retained on site. The basin has a total capacity of approximately 595 m³, sufficient to store both firefighting water and concurrent rainfall. Additional measures include a roadside swale and filter strip to treat runoff from access tracks, and a drainage network designed to direct all flows toward the containment system. Emergency procedures allow contaminated water to be removed by tanker and the system to be monitored and cleaned following any incident.
- 8.20 Overall, the strategy demonstrates that surface water can be managed sustainably through infiltration and treatment, while also providing robust safeguards to contain and manage firewater, protecting both the surrounding environment and groundwater. A condition requiring final drainage details to be approved prior to commencement is included.
- 8.21 **Battery Safety:** A recent appeal decision at Kilmorack (23/03113/FUL) found that fire safety is not generally a direct planning consideration, as matters such as fire risk management and emergency planning fall under separate regulatory regimes; however, it also confirmed that fire-related issues may be indirectly relevant where they influence planning matters such as layout, access, visual impact, or effects on designated sites. Notwithstanding this, securing a firefighting and emergency strategy by condition is considered appropriate in this case. Public concerns regarding fire risk are acknowledged, and the requirement for such a strategy demonstrates that the potential impacts on human health, safety, and the environment, although unlikely, have been properly considered and mitigated, ensuring compliance with NPF4 Policy 23 on Health and Safety.
- 8.22 This approach is supported by the submitted Outline Battery Safety Management Plan, which sets out a high-level framework for identifying and managing fire risks - such as thermal runaway, electrical fires, and explosion hazards - through design measures, safety systems, site layout, and emergency infrastructure, with the document intended to evolve into a detailed safety plan to ensure the safe construction, operation, and management of the development. This is covered by condition.
- 8.23 **Noise:** The original permission includes a condition restricting noise to be restricted to 26 dB at all times. It is recognised that the principal noise generating elements of BESS developments are typically the inverters and battery cooling systems. As ambient temperatures are generally lower during night-time, cooling demand is reduced, resulting in lower noise emissions. Conversely, during the day higher ambient temperatures can lead to increased cooling requirements and potentially higher noise output. For this reason, Environmental Health can accept separate daytime and night-time operational noise limits, and it is noted that this is consistent

with the approach taken in the more recent BESS developments approved in the area. In consultation with Environmental Health, revised noise limits of 33 dB (daytime) and 26 dB (night-time) have been agreed and the planning condition amended accordingly.

- 8.24 **Biodiversity Net Gain:** NPF4 has introduced a greater emphasis on the enhancement of biodiversity in all developments, with Policy 3(b) stating 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”. In order to demonstrate that the proposal can comply with NPF4, the applicant has submitted a Biodiversity Net Gain Report, which sets out the proposed habitat creation and enhancement which would achieve a biodiversity net gain of 27.64% based on the creation of other neutral grassland, mixed scrub and woodland, well above the Council’s 10% requirement. Delivery and maintenance of these measures can be secured by condition.
- 8.25 **Social and Economic Benefit:** Energy storage developments are recognised as an emerging and important part of national infrastructure, with potential to support jobs and economic growth. The Council’s strategic priorities, set out in the Highland Outcome Improvement Plan (2024–2027) and the Community Wealth Building Strategy, focus on maximising local economic benefits, reducing inequality, and ensuring communities share in development gains.
- 8.26 The Social Values Charter for Renewables Investment (2024) sets expectations for developers to contribute to local employment, supply chains, community funding, skills development, and environmental benefits. This proposal is expected to align with these aims and deliver lasting socio-economic benefits. The Council’s Community Wealth Building Team is engaging with the developer to help secure these outcomes. In line with the approach taken with more recent BESS developments a planning condition is included requiring the applicant to submit a Local Employment Scheme for approval prior to the development commencing.
- 8.27 **Other matters:** All other matters previously considered under application 22/03638/FUL, including the principle of development, visual impact, noise impact, effects on natural, built and cultural heritage, site boundary treatments, lighting, access from the A939, impacts on protected species and habitats, as well as tree planting and landscaping, remain unchanged and continue to be acceptable. However, in order to ensure the consent is up to date and consistent with other recent BESS permissions in the area, a number of planning conditions relating to these matters have been amended and/or reworded.
- 8.28 **New Conditions:** The following conditions have been added to reflect the updated information submitted, required due to changes in relevant policy and guidance, as discussed above:
- Condition 2 (Accordance with the Provisions of the Application) – replaces Condition 17 of 22/03638/FUL
 - Condition 12 (Biodiversity Shapefiles)
 - Condition 14 (Protected Species)
 - Condition 16 (Cable Routing)
 - Condition 17 (Drainage) replaces Condition 7 of 22/03638/FUL

- Condition 19 (Fire Risk Management and Emergency Response Procedures)
- Condition 20 (Record keeping) partially replaces Condition 18 of 22/03638/FUL
- Condition 21 (Socio-economic Benefits)
- Condition 22 (Firewater Supply and Disposal)
- Condition 23 (Biodiversity Net Gain Report)

8.29 **Amended Conditions:** The following conditions have been amended to take account of best practice and in the interests of consistency across more recent BESS applications in the area:

- Condition 3 (Final Layout) - amended to refer to battery spacing, best practice and to ensure a dual access into the operational area of the site (replaces Condition 4 of 22/03638/FUL)
- Condition 5 (Decommissioning, Restoration and Aftercare) – amended to include specific reference to matters such as waste removal, pollution prevention, soil and traffic management (replaces Condition 5 of 22/03638/FUL)
- Condition 18 (Noise and Dust) – amended to include separate daytime and nighttime noise limits (replaces Condition 15 of 22/03638/FUL)

8.30 **Deleted Conditions:** The following conditions attached to 22/03638/FUL are no longer required and have been removed:

- Condition 2 (Temporary Permission) – this limited the development to a temporary period of 50 years. This condition is no longer attached to applications of this type as standard therefore in the interests of consistency has been removed. Decommissioning is adequately covered by other conditions.
- Condition 14 (No trees to be removed) – this condition is no longer applied as standard. Tree protection is covered by condition 11.

8.31 **Remaining conditions:** The following conditions are unchanged from 22/03638/FUL but are renumbered:

- Condition 4 (Battery removal) – was Condition 16 of 22/03638/FUL
- Condition 6 (Financial Guarantee) – was Condition 12 of 22/03638/FUL
- Condition 7 (Lighting) – was Condition 6 of 22/03638/FUL
- Condition 8 (Archaeology) – was Condition 11 of 22/03638/FUL
- Condition 9 (Hard and Soft Landscaping) – was Condition 8 of 22/03638/FUL
- Condition 10 (Arboricultural Supervision) – was Condition 9 of 22/03638/FUL
- Condition 11 (Tree Protection) – was Condition 10 of 22/03638/FUL
- Condition 13 (Construction Environmental Management Document) – was Condition 3 of 22/03638/FUL
- Condition 15 (Construction Traffic Management Plan) – was Condition 13 of 22/03638/FUL

Non-material considerations

- 8.32 The Community Council objects on the basis that the applicant was aware of uncertainties around grid connection timing and took a commercial risk which has not materialised, and therefore the consent should not be extended. Concerns are also raised regarding lithium battery technology, which is considered outdated, environmentally harmful, and a potential fire risk. It is suggested that the Council should resist further lithium-based BESS developments and require the use of more advanced and environmentally sustainable technologies in any extended permission.
- 8.33 These concerns are noted. However, grid connection timing and delivery constraints are commercial matters and do not constitute material planning grounds to refuse an application where the principle of development has already been established. While battery technology continues to evolve, lithium-ion systems remain widely used and are subject to established safety standards, regulatory controls, and guidance. The planning system does not prescribe specific technologies but instead assesses proposals against relevant policy, including safety, environmental, and amenity considerations, which can be addressed through planning conditions. The issues raised do not alter the previous assessment of the development and do not provide sufficient grounds to withhold consent, subject to appropriate conditions which take into account the evolving policy and guidance within this sector.

Matters to be secured by Legal Agreement / Upfront Payment

- 8.34 None

9. CONCLUSION

- 9.1 Planning Permission is sought under S42 to vary Condition 1 of Planning Permission 22/03638/FUL which relates to the time limit for the implementation of the Planning Permission: The extant consent required the permission to be implemented by 17 February 2026. This applicant has requested a further 1-year implementation period from this date to extend the permission until 17 February 2027. The request is primarily due to timing of infrastructure works for the grid connection having been extended by the grid provider.
- 9.2 Given the significant changes to the policy framework since permission 22/03638/FUL was granted, the opportunity has been taken, within the scope of a Section 42 application, to reassess the proposal against the current adopted Development Plan. As part of this process, additional conditions are proposed and some existing conditions have been amended to ensure the development reflects up-to-date policy and guidance. These matters are to be addressed through pre-commencement planning conditions, requiring the submission and approval of relevant details by the Planning Authority prior to the start of development. Subject to these conditions, it is considered that the development accords with the Development Plan and an extension of time is acceptable. In order to allow sufficient time for conditions to be discharged and a grid connection to be provided, it is considered appropriate that a further permission is granted for a period of one year from the date of decision.

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

10. IMPLICATIONS

- 10.1 Resource: Not applicable
- 10.2 Legal: Not applicable
- 10.3 Community (Equality, Poverty and Rural): Not applicable
- 10.4 Climate Change/Carbon Clever: Not applicable
- 10.5 Risk: Not applicable
- 10.6 Gaelic: Not applicable

11. RECOMMENDATION

Action required before decision issued N

Notification to Scottish Ministers N

Conclusion of Section 75 Obligation N

Revocation of previous permission N

Recommended to **GRANT** the application subject to the following conditions and reasons:

1. Time Limit for Implementation

The development to which this Planning Permission relates must commence within ONE YEAR of the date of this decision notice. If development has not commenced within this period, then this Planning Permission shall lapse.

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

2. Accordance with the Provisions of the Application

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

- Battery Storage Units with associated transformers and inverter
- DNO substation
- Control Room
- Welfare/Site office/ancillary buildings

- Security fencing and wooden acoustic barrier fencing
- CCTV masts with cameras
- Hardstanding
- Site access and internal access tracks
- Parking
- SUDS
- Landscaping
- Firefighting water storage tank

(2) Prior to the final commissioning of the development hereby approved, all elements of the development that relate to Part (1) above, and as approved in writing by the Planning Authority under Condition 3 below, along with site drainage infrastructure, site security measures, and fire safety measures including the means of containment of fire suppressant materials, shall be constructed and installed in full, made available for use, and thereafter maintained for this use for the lifetime of the development.

(3) In the event of the Development not storing and supplying electricity on a commercial basis to the grid network for a continuous period of 12 months from 50% or more batteries installed and commissioned from time to time, the developer shall immediately notify the Planning Authority in writing of that situation and shall, if the Planning Authority direct in writing, decommission the development and reinstate the site to the specification and satisfaction of the Planning Authority in accordance with an approved Decommissioning, Restoration, and Aftercare Plan, which shall be based on the principles of the Decommissioning, Restoration, and Aftercare Strategy approved under Condition 5 of this permission and updated according with the relevant guidance and best practice at the time. The Planning Authority shall have due regard to the circumstances surrounding the failure to store electricity.

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

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

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

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

- a) the make, model, design, power rating, sound power level of the batteries, the dimensions of the battery storage cabinets and ancillary infrastructure, control building, storage and office facilities to be installed, and show separation distances between battery storage units which shall comply with the prevailing fire safety legislation and best practice guidelines at the time of installation;
- b) the external colour and/or finish of the storage containers, buildings and ancillary infrastructure on site, which shall have a dark-neutral, non-reflective, semi-matte finish;
- c) colour of the acoustic fencing (dark green or similar recessive colour);
- d) dimensioned plans (and swept path) showing access and turning within the site to enable safe access/egress in a forward gear, and to demonstrate that the operational area can be accessed from 2 separate points, or that the operational area is enclosed by a perimeter access road, in line with NFCC Guidelines; and
- e) no element of the development having any text, sign or logo displayed on any external surface, save those required by law under other legislation.

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

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

4. **Battery Removal**

In the event that any infrastructure installed and commissioned fails to store electricity, transmit, and / or distribute electricity to the public network when required on a commercial basis for a continuous period of 6 months, then unless otherwise agreed in writing with the Planning Authority, such infrastructure (including battery and synchronous compressors) shall be deemed to have ceased to be required. If deemed to have ceased to be required, the infrastructure, including its storage container and / or building, and any other associated ancillary equipment shall be dismantled and removed from the site. For the avoidance of doubt, any batteries and synchronous compressors removed from the site shall be recycled by the developer within the following 3-month period, and the ground reinstated to the specification and satisfaction of the Planning Authority.

Reason: To ensure that any redundant battery is removed from the site in a timely manner in the interests of safety, amenity, and environmental protection.

5. **Decommissioning, Restoration, and Aftercare**

No development shall commence unless and until a Decommissioning, Restoration, and Aftercare Strategy has been submitted to, and approved in writing by, the Planning Authority. The strategy shall outline measures for the decommissioning of the development along with the restoration and aftercare of the site, and shall include proposals for the removal of individual components of the development as well as the development as a whole as well as the treatment of ground surfaces, and, the management and timing of the works and environmental management provisions which shall include, but not be limited to, the following:

- a) site waste management plan (dealing with all aspects of waste produced during the decommissioning, restoration and aftercare phases);
- b) details of measures to be taken to prevent loose or deleterious material being deposited on the local road network, including wheel cleaning and lorry sheeting facilities, and measures to clean the site entrances and the adjacent local road network;
- c) a pollution prevention and control method statement, including arrangements for the storage and management of oil and fuel on the site;
- d) details of measures for soil storage and management;
- e) a surface water and groundwater management and treatment plan, including details of the separation of clean and dirty water drains, and location of settlement lagoons for silt laden water;
- f) temporary site illumination;
- g) management and timing of the works; and
- h) a traffic management plan to address any traffic impact issues during the decommissioning period.

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

6. **Financial Guarantee**

No development shall commence until:

- i. Full details of a guarantee, bond or other financial provision to be put in place to cover all of the decommissioning and Site restoration measures outlined in the Decommissioning, Restoration, and Aftercare Strategy approved under condition 5 of this permission have been submitted to, and approved in writing by, the Planning Authority. For the avoidance of doubt the guarantee, bond or other financial provision must be able to be called upon by The Highland Council and be enforceable against the operator and landowner and / or leaseholder; and,
- ii. Confirmation in writing by a suitably qualified independent professional that the amount of financial provision proposed under

- part (i) above is sufficient to meet the full estimated costs of all decommissioning, dismantling, removal, disposal / recycling, site restoration, remediation and incidental work, as well as associated professional costs, has been submitted to, and approved in writing by, the Planning Authority; and,
- iii. Documentary evidence that the guarantee, bond or other financial provision approved under parts (i) and (ii) above is in place has been submitted to, and confirmation in writing that the financial provision is satisfactory has been issued by, the Planning Authority.

Thereafter, the Operator, and Leaseholder and/or Landowner, shall:

- i. Ensure that the guarantee, bond or other financial provision is maintained throughout the duration of this permission; and,
- ii. Pay for the guarantee, bond or other financial provision to be subject to a review five years after the commencement of development and every five years thereafter until such time as the development is decommissioned and the Site restored.

Each review shall be:

- a) conducted by a suitably qualified independent professional; and
- b) published within three months of each five-year period ending, with a copy submitted upon its publication to both the landowner(s) and the Planning Authority; and
- c) approved in writing by the Planning Authority without amendment or, as the case may be, approved in writing by the Planning Authority following amendment to their reasonable satisfaction.

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

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

7. External Lighting

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

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

8. **Archaeology**

No development or work (including site clearance) shall commence until a programme of work for the survey, evaluation, preservation and recording of any archaeological and historic features affected by the proposed development/work, including a timetable for investigation, has been submitted to, and approved in writing by, the Planning Authority. The approved programme shall be implemented in accordance with the agreed timetable for investigation.

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

9. **Hard and Soft Landscaping**

No development shall commence until details of a scheme of hard and soft landscaping works have been submitted to, and approved in writing by, the Planning Authority. Details of the scheme shall include:

- i. All earthworks and existing and finished ground levels in relation to an identified fixed datum point;
- ii. A minimum of two cross sections through the site running northwest to southeast, and, a minimum of two cross sections through the site running southwest to northeast, showing the existing land contours and the proposed finished ground levels, the floor levels of the proposed infrastructure, buildings (including underbuilding), the associated hardstanding areas, vehicle parking/turning areas, fencing, and adjoining land, all relative to a fixed datum point;
- iii. A plan showing existing landscaping features and vegetation to be retained;
- iv. The location and design, including materials, of any existing or proposed walls, fences and gates;
- v. All soft landscaping and planting works, including plans and schedules showing the location, species and size of each individual tree and/or shrub and planting densities; and,
- vi. A programme for preparation, completion and subsequent on-going maintenance and protection of all landscaping works.

Landscaping works shall be carried out in accordance with the approved scheme. All planting, seeding or turfing as may be comprised in the approved details shall be carried out in the first planting and seeding seasons following the commencement of development, unless otherwise stated in the approved scheme.

Any trees or plants that within a period of five years from the completion of the development die, for whatever reason are removed or damaged shall be replaced in the next planting season with others of the same size and species.

Reason: In order to ensure that a high standard of landscaping is achieved, appropriate to the location of the site, and in order to ensure the long-term management of trees and / or woodland.

10. **Arboricultural Supervision**

No development, site excavation or groundwork shall commence until a suitably qualified Arboricultural Consultant has been appointed by the developer who shall be appointed prior to the commencement of the development and as a minimum retained until the completion of the development. The Arboricultural Consultant's remit shall include ensuring that the approved Tree Protection Plan (IMTeco Ltd dated May 2022) is implemented to the agreed standard.

The preparation of Certificates of Compliance for each stage of work involved in the development, shall be submitted to the Planning Authority upon completion of the stage to which they relate. Prior to development, site excavation or groundwork commencing, details of each stage of work (including a general description of the type and extent of work to be carried out within that stage) shall be submitted to and approved in writing by the Planning Authority.

Reason: To ensure the protection of retained trees throughout the construction period.

11. **Tree Protection**

No development, site excavation or groundwork shall commence until all retained trees are protected against construction damage using protective barriers located in accordance with the approved Tree Protection Plan (in accordance with BS 5837:2012 Trees in Relation to Design, Demolition & Construction). Thereafter, all protective barriers shall remain in place throughout the construction period and shall not be moved or removed without the prior written approval of the Planning Authority.

Reason: To ensure the protection of retained trees throughout the construction period.

12. **Biodiversity Shapefiles**

GIS Shapefiles shall be supplied of the compensation and enhancement areas to the Planning Authority prior to the commencement of works.

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

13. **Construction Environment Management Document (CEMD)**

No development shall commence until a Construction Environment Management Document (CEMD) has been submitted to and approved in writing by the Planning Authority. Thereafter the construction of the development shall only be carried out in accordance with the approved

CEMD, subject to any variations approved in writing by the Planning Authority. The CEMD shall include:

- a) details of the phasing of construction works;
- b) details of any temporary site construction compound including temporary structures/buildings, fencing, parking and storage provision to be used in connection with the construction of the development;
- c) details and implementation and a timetable for post construction restoration/reinstatement of the temporary working areas, and the construction compound;
- d) details of the method of construction and erection of the structures and any underbuilding/platforms;
- e) details of pollution control: protection of the water environment, bunding of fuel storage areas, surface water drainage, sewage disposal and discharge of foul drainage;
- f) details of a scheme of mitigation for construction dust;
- g) details for management and operation of any concrete batching plant (including disposal of pH rich wastewater and substances);
- h) the maximum height and location of all stockpiles of aggregate
- i) risk assessment of potentially damaging construction-type activities on the environment;
- j) details of temporary site illumination during the construction period, which shall be wildlife friendly;
- k) details of timing of works;
- l) details of surface treatments and the construction of all hard surfaces and access tracks between each element of the proposed development. This shall include details of the tracks in a dark, non-reflective finish with details of the chemical properties of any and all imported stone provided;
- m) details of routeing of onsite cabling;
- n) details of emergency procedures and pollution response plans;
- o) siting and details of wheel washing facilities;
- p) cleaning of site entrances, site tracks and the adjacent public highway and the sheeting of all HGVs taking spoil or construction materials to/from the site to prevent spillage or deposit of any materials on the highway;
- q) details of working practices for protecting nearby residential dwellings, including general measures to control noise and vibration arising from on-site activities, to be adopted as set out in BS5228 Part 1: 2009;
- r) details of the location of tree protection fencing;
- s) a Species Protection Plan to include mitigation measures outlined in the Ecological Appraisal by IMTeco Ltd dated May 2022 submitted with the application, including:
 - a. pre-commencement bird and protected species surveys;
 - b. additional bat and red squirrel surveys to be conducted prior to any works to trees in addition to any approvals as required under Condition 13 of this permission;
 - c. maintain minimum buffer zones between development works and badger setts;

- d. cover excavations overnight where possible to prevent animals falling into them and to inspect excavations for the presence of animals prior to recommencing work on them;
 - e. where it is not possible to cover excavations overnight, uncovered excavations should include a means of escape for any animal that may fall in;
 - f. all construction works shall take place outwith the hours of dawn and dusk;
 - g. use of pallets to raise the storage of all building materials above ground; and,
 - h. ensure waste materials are placed in appropriate facilities.
- t) details of areas on the site designated for the storage, loading, off-loading, parking and manoeuvring of heavy-duty plant, equipment and vehicles; and,
 - u) Mitigation to protect the ecological resources on site, including biodiversity protection zones, location and timing of works.

Reason: To ensure that construction works are undertaken in accordance with applicable standards in the interests of environmental protection, amenity, and safety, and that the mitigation measures contained in the Biodiversity Net Gain and Ecological Appraisal reports that accompanied the application, or as otherwise agreed, are fully implemented.

14. **Protected Species and Habitats**

No development or Site Enabling Works shall commence until pre-construction ecological surveys are undertaken, which shall be undertaken at the appropriate time of year and no more than 3 months prior to works commencing on site, and a report of the survey has been submitted to, and approved in writing by, the Planning Authority. The surveys shall cover the application site including an appropriate buffer from its boundary with the report including mitigation measures where any impact, or potential impact, on protected species or their habitat has been identified.

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

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

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

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

No development shall commence unless and until a finalised Construction Traffic Management Plan (CTMP) has been submitted to, and approved in writing by, the Council. The CTMP shall include:

- a) Full details of the proposed site access, including geometry, construction, drainage, visibility splays (which shall be a minimum of 125m looking left when exiting the site and 133m looking right with a setback of 2.4m), and traffic management measures, shall be provided for the agreement of the Planning Authority in consultation with the Roads Authority, prior to any works commencing;
- b) Identification of the routes to site for general construction traffic and details of the number and type of vehicle movements anticipated on these routes during the construction period;
- c) A detailed protocol for the delivery of AIL's, prepared in consultation and agreement with interested parties, including Highland Council, Police Scotland, Transport Scotland and, as required, community representatives;
- d) Proposed traffic management measures on the routes to site for construction traffic including temporary speed limits, suitable temporary signage, road markings, and the use of speed activated signs;
- e) Proposed measures to mitigate the impact of AIL's and general construction traffic on the routes to site following detailed assessment of the relevant roads;
- f) A procedure for the regular monitoring of road conditions and the implementation of any remedial works required during the construction period; and
- g) Measures to ensure that all affected public roads are kept free of mud and debris arising from the development.

Thereafter, the development shall proceed in accordance with the approved CTMP including the construction timetable specified within the document.

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

16. **Cable Routing Plan**

No development shall commence until the proposed cable routing plan for connection to the grid has been submitted to, and approved in writing by, the Planning Authority in consultation with Transport Scotland. The development shall thereafter be undertaken in accordance with the agreed details.

Reason: To ensure that the future improvement of the trunk road is not prejudiced.

17. **Drainage**

No development shall commence until details of the final drainage design (including final ground levels and discharge rates information) for the site access road and junction shall have been submitted to, and approved in writing by, the Planning Authority. For the avoidance of doubt the design shall include:

- i. measures for the testing of a spent fire suppressant water and where necessary its containment and disposal
- ii. calculations to demonstrate that all storm events up to the 1 in 200 year plus climate change storm event shall be managed from within the application site boundary.
- iii. a swale for the access road and measures to ensure that surface water does not discharge from the site on to the public road.

Thereafter, the development shall be constructed in accordance with the approved details with all drainage arrangements made available for use prior to the development's first occupation and maintained for the operational lifetime of the development. At no times shall surface water discharge from the development site on to the public road.

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

18. **Noise Impact**

Any noise originating from the routine commercial operation of the development shall not exceed the following Rating Levels, including any applicable acoustic character penalties, when measured and/or calculated at the curtilage of any noise-sensitive property:

- 33 dB LAr,Tr during the daytime period, 07:00 to 23:00; and
- 26 dB LAr,Tr during the night-time period, 23:00 to 07:00.

For the purposes of this condition, "noise-sensitive property" includes, but is not necessarily limited to, any building, structure or other development the lawful use of which falls within Classes 7 (Hotels & Hostels), 8 (Residential Institutions) or 9 (Houses) of the Town and Country Planning (Use Classes) (Scotland) Order 1997 (as amended), or which is in use as a flat or static residential caravan, in lawful existence at the point of Determination. To that end:

- 1) No development shall commence until a Noise Impact Assessment shall have been submitted to and approved by the Planning Authority in consultation with the Environmental Health Authority, which shall demonstrate that the above noise ratings can be achieved. The approved acoustic mitigation shall be implemented prior to the operation of the development and thereafter maintained for the operational lifetime of the development.

For the avoidance of doubt, the Rating Level limits set out above shall apply to the routine commercial operation of the BESS and associated cooling / electrical plant. The standby generator shall not be operated as part of the routine commercial operation of the development. Operation of the standby generator shall be limited to emergency use, abnormal loss-of-grid / auxiliary power scenarios, and short-duration routine testing or maintenance. Routine testing and maintenance of the standby generator shall be undertaken during the daytime period only, unless otherwise agreed in writing with the Planning Authority.

- 2) Within 4 weeks of operations commencing, and at the expense of the operator, compliance monitoring shall be carried out by a competent person in accordance with details agreed in writing with the Council's Environmental Health Service prior to the commencement of compliance monitoring.
- 3) Within 2 weeks of the monitoring exercise being completed, a noise assessment report shall be submitted for the written approval of the Planning Authority. The noise assessment shall demonstrate whether the proposed development complies with the daytime and night-time rating levels prescribed above. If the noise level from routine commercial operation exceeds the prescribed noise limits, the noise assessment shall include a scheme of mitigation to be enacted, including timescales for implementation, to ensure compliance with this condition. Thereafter, any mitigation measures shall be implemented in accordance with the approved scheme and timescales

Reason: To ensure that the noise impact of the development does not exceed the predicted noise levels set out within the supporting noise assessment.

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

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

- i. a complete and fully implementable Fire Risk Management Plan; and,
- ii. a complete and fully implementable Fire Emergency Response Plan. The developer shall thereafter undertake any review and amendment to both documents as may be required from time to time, in consultation with the relevant agencies.

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

20. **Record Keeping**

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

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

21. **Socio-Economic Benefit**

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

- a) details of how the initial staff/employment opportunities at the development will be advertised and how liaison with the Council and other local bodies will take place in relation to maximising the access of the local workforce to information about employment opportunities;
- b) details of how sustainable training opportunities will be provided for those recruited to fulfil staff/employment requirements including the provision of apprenticeships or an agreed alternative;
- c) a procedure setting out criteria for employment, and for matching of candidates to the vacancies;
- d) measures to be taken to offer and provide college and/or work placement opportunities at the development to students within the locality;
- e) details of the promotion of the Local Employment Scheme and liaison with contractors engaged in the construction of the development to ensure that they also apply the Local Employment Scheme so far as practicable having due regard to the need and availability for specialist skills and trades and the programme for constructing the development;
- f) a procedure for monitoring the Local Employment Scheme and reporting the results of such monitoring to the Council; and
- g) a timetable for the implementation of the Local Employment Scheme.

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

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

22. **Firewater Supply**

No development shall commence until full details of an appropriate firefighting water supply (e.g. appropriately sized tank) shall have been submitted to and agreed in writing by the Planning Authority. Thereafter the water supply shall be implemented in accordance with the approved details prior to the site becoming operational.

Reason: In the interest of environmental protection, to ensure no compromise to nearby designated sites.

23. **Biodiversity Net Gain**

No development shall commence until a Biodiversity Net Gain (BNG) Report has been submitted to and approved in writing by the Planning Authority. The report shall:

- a) demonstrate how the development will deliver measurable biodiversity net gain;
- b) include baseline surveys and an assessment of existing biodiversity value;
- c) set out detailed proposals for habitat creation, enhancement, and management;
- d) include a timetable for implementation of all measures; and
- e) provide details of ongoing monitoring, management, and reporting.

Thereafter, the development shall be carried out in full accordance with the approved Biodiversity Net Gain Report, including all mitigation, enhancement measures, management actions, and implementation timescales set out within it, unless otherwise agreed in writing by the Planning Authority.

Reason: To ensure the development delivers measurable biodiversity net gain in the interests of nature conservation and sustainable development.

REASON FOR DECISION

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

INFORMATIVES

Initiation and Completion Notices

The Town and Country Planning (Scotland) Act 1997 (as amended) requires all developers to submit notices to the Planning Authority prior to, and upon completion of, development. These are in addition to any other similar requirements (such as

Building Warrant completion notices) and failure to comply represents a breach of planning control and may result in formal enforcement action.

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

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

Accordance with Approved Plans & Conditions

You are advised that development must progress in accordance with the plans approved under, and any conditions attached to, this permission. You must not deviate from this permission without consent from the Planning Authority (irrespective of any changes that may separately be requested at the Building Warrant stage or by any other Statutory Authority). Any pre-conditions (those requiring certain works, submissions etc. prior to commencement of development) must be fulfilled prior to work starting on site. Failure to adhere to this permission and meet the requirements of all conditions may invalidate your permission or result in formal enforcement action.

Flood Risk

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

Scottish Water

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

Septic Tanks and Soakaways

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

Local Roads Authority Consent

In addition to Planning Permission, you may require one or more separate consents (such as road construction consent, dropped kerb consent, a road openings permit, occupation of the road permit etc.) from the Area Roads Team prior to work commencing. These consents may require additional work and/or introduce additional specifications and you are therefore advised to contact your local Area Roads office for further guidance at the earliest opportunity.

Failure to comply with access, parking and drainage infrastructure requirements may endanger road users, affect the safety and free-flow of traffic and is likely to result in enforcement action being taken against you under both the Town and Country Planning (Scotland) Act 1997 and the Roads (Scotland) Act 1984.

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

Application forms and guidance notes for access-related consents can be downloaded from:

http://www.highland.gov.uk/info/20005/roads_and_pavements/101/permits_for_working_on_public_roads/2

Mud and Debris on Road

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

Construction Hours and Noise-Generating Activities

You are advised that construction work associated with the approved development (incl. the loading/unloading of delivery vehicles, plant or other machinery), for which noise is audible at the boundary of the application site, should not normally take place outwith the hours of 08:00 and 19:00 Monday to Friday, 08:00 and 13:00 on Saturdays or at any time on a Sunday or Bank Holiday in Scotland, as prescribed in Schedule 1 of the Banking and Financial Dealings Act 1971 (as amended).

Work falling outwith these hours which gives rise to amenity concerns, or noise at any time which exceeds acceptable levels, may result in the service of a notice under Section 60 of the Control of Pollution Act 1974 (as amended). Breaching a Section 60 notice constitutes an offence and is likely to result in court action.

If you wish formal consent to work at specific times or on specific days, you may apply to the Council's Environmental Health Officer under Section 61 of the 1974 Act. Any such application should be submitted after you have obtained your Building Warrant, if required, and will be considered on its merits. Any decision taken will reflect the nature of the development, the site's location and the proximity of noise sensitive premises. Please contact env.health@highland.gov.uk for more information.

Protected Species – Halting of Work

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

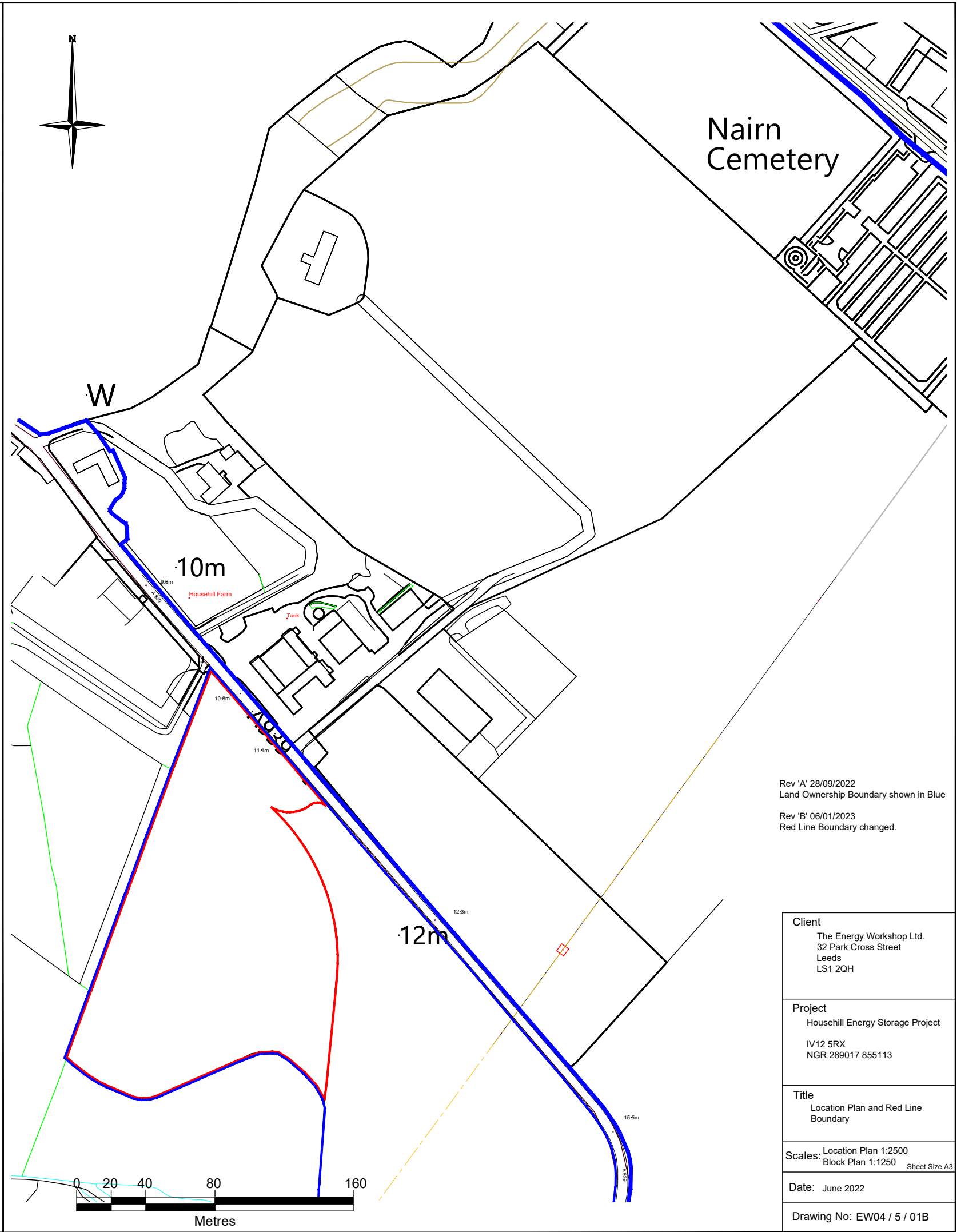
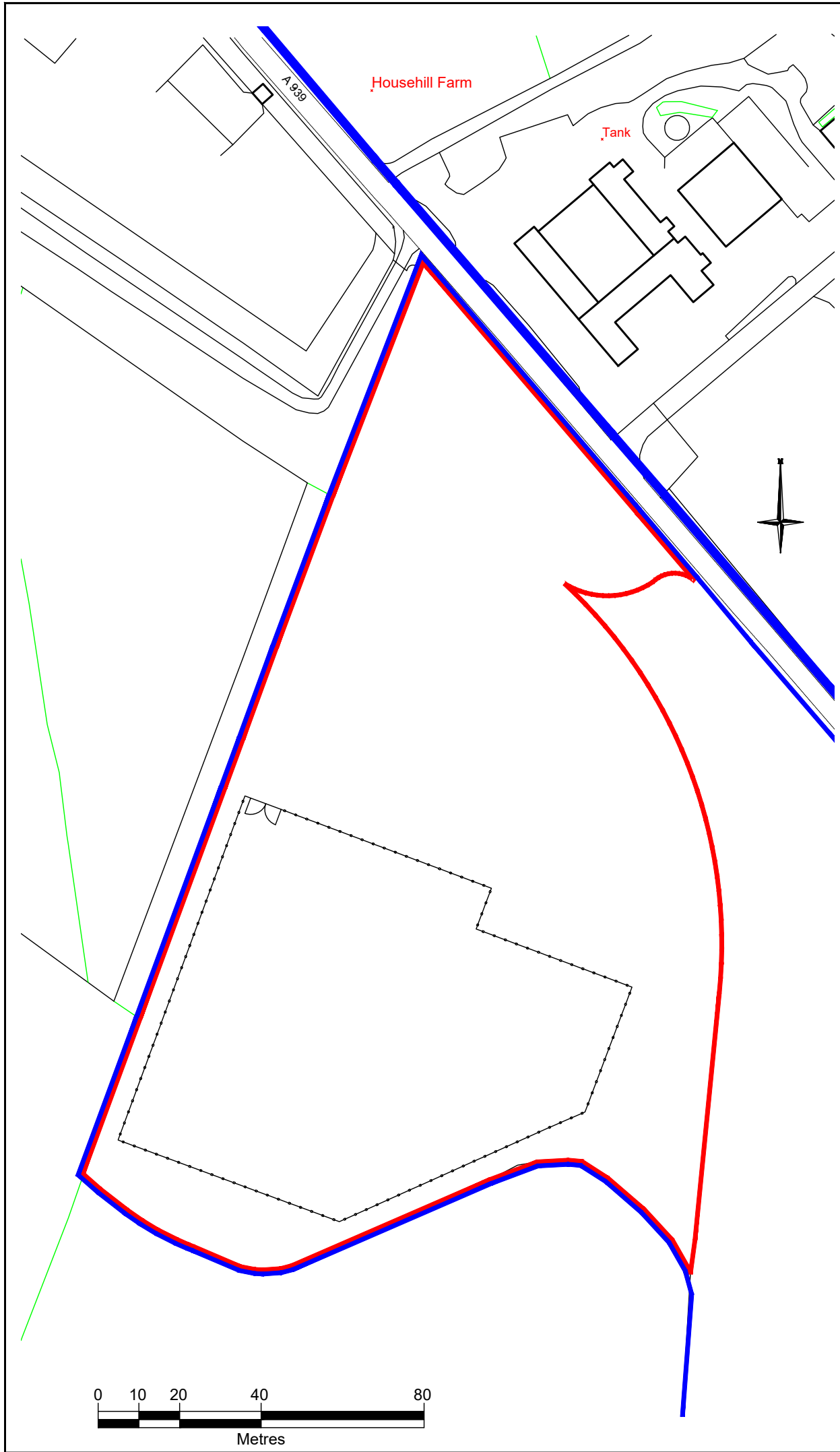
Protected Species - Contractors' Guidance

You must ensure that all contractors and other personnel operating within the application site are made aware of the possible presence of protected species. They must also be provided with species-specific information (incl. guidance on identifying their presence) and should be made aware of all applicable legal requirements (incl. responsibilities and penalties for non-compliance).

Protected Species - Tree Felling

Any mature trees within the application site which are to be felled, lopped or topped must be surveyed for bats prior to the works being carried out. If a bat roost is identified work must stop and further advice sought from SNH's area office. It is an offence to interfere with bats and/or their roosts without a license and strict penalties will be applied through the courts where a license has not been obtained.

Signature:	Bob Robertson
Designation:	(Acting) Planning Manager (South)
Author:	Christine Macleod
Background Papers:	Documents referred to in report and in case file.
Relevant Plans:	Plan 1 - EW04-S02 – Location Plan Plan 2 - EW04/5/03 Rev B – Approved Site Layout (22/03638/FUL) Plan 3 - EW04/5/03 REV D – Indicative Site Layout Plan Plan 4 - B7220-GCR-DR-GA-DR-P-0001 REV P03 – Indicative Drainage Plan Plan 5 - N1832-ONE-ZZ-ZZ-DR-L-0201 REV P02 – Indicative Tree Planting Plan



Rev 'A' 28/09/2022
Land Ownership Boundary shown in Blue
Rev 'B' 06/01/2023
Red Line Boundary changed.

Client
The Energy Workshop Ltd.
32 Park Cross Street
Leeds
LS1 2QH

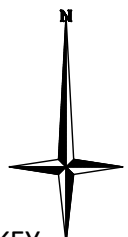
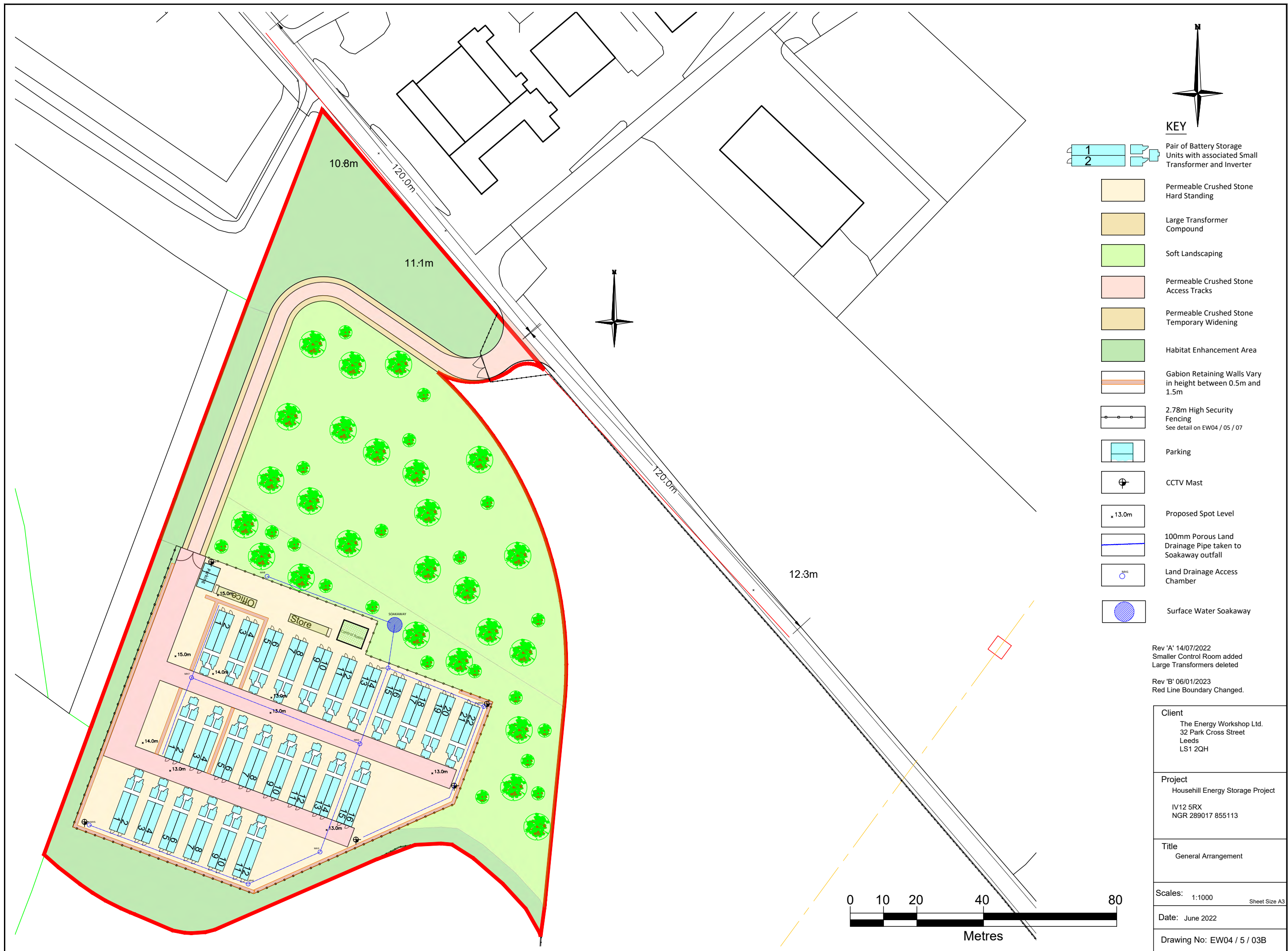
Project
Househill Energy Storage Project
IV12 5RX
NGR 289017 855113

Title
Location Plan and Red Line
Boundary

Scales: Location Plan 1:2500
Block Plan 1:1250 Sheet Size A3

Date: June 2022

Drawing No: EW04 / 5 / 01B



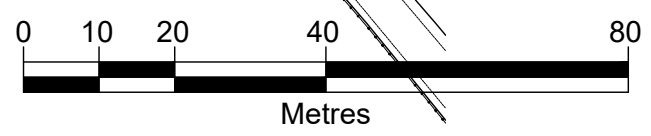
KEY

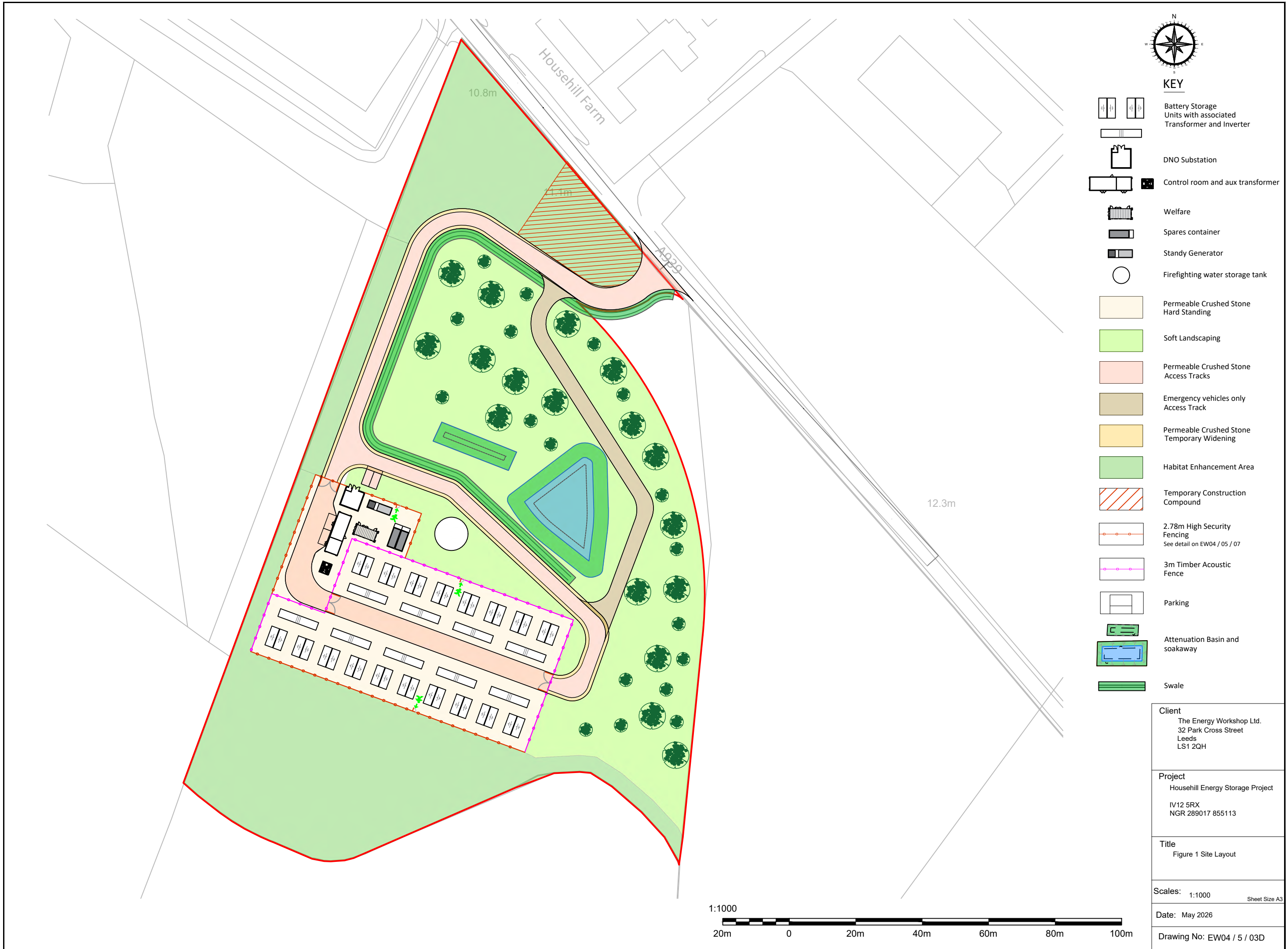
- Pair of Battery Storage Units with associated Small Transformer and Inverter
- Permeable Crushed Stone Hard Standing
- Large Transformer Compound
- Soft Landscaping
- Permeable Crushed Stone Access Tracks
- Permeable Crushed Stone Temporary Widening
- Habitat Enhancement Area
- Gabion Retaining Walls Vary in height between 0.5m and 1.5m
- 2.78m High Security Fencing See detail on EW04 / 05 / 07
- Parking
- CCTV Mast
- Proposed Spot Level
- 100mm Porous Land Drainage Pipe taken to Soakaway outfall
- Land Drainage Access Chamber
- Surface Water Soakaway

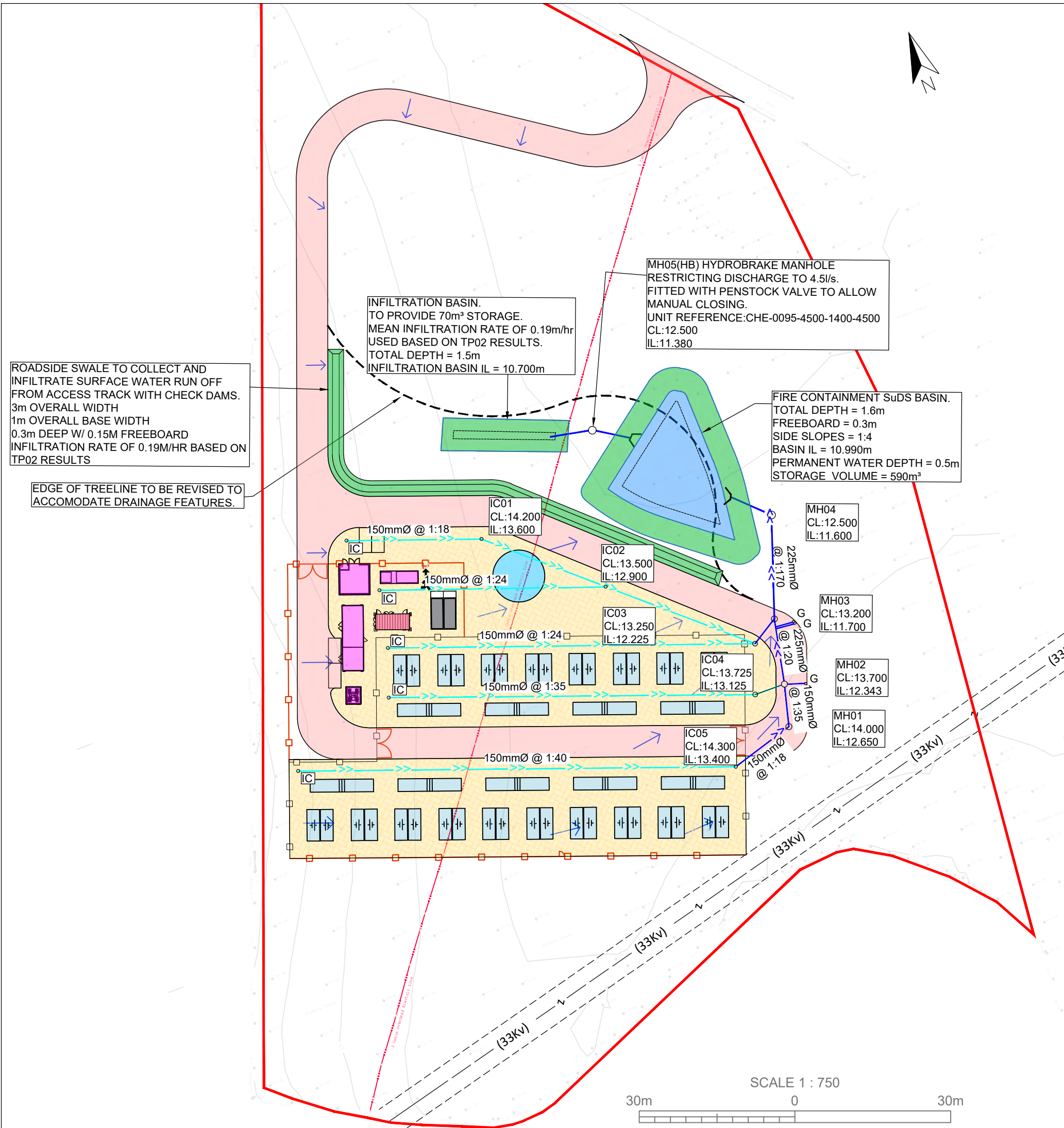
Rev 'A' 14/07/2022
Smaller Control Room added
Large Transformers deleted

Rev 'B' 06/01/2023
Red Line Boundary Changed.

Client
The Energy Workshop Ltd. 32 Park Cross Street Leeds LS1 2QH
Project
Househill Energy Storage Project IV12 5RX NGR 289017 855113
Title
General Arrangement
Scales: 1:1000
Sheet Size A3
Date: June 2022
Drawing No: EW04 / 5 / 03B







Site Drainage Information

The site area is approximately 0.68Ha

Percolation tests were carried at trial pit locations TP1 and TP2, results can be found in report appendices.

The soakaway is proposed to be located adjacent to trial pit 2, so the mean infiltration rate from trial pit 2 has been selected for use at the soakaway: **3.12E⁻⁵m/s & 7.63E⁻⁵m/s** or Giving a mean of **5.37E⁻⁵m/s or 0.19m/hr**

The drainage network is designed to accommodate storms up to the **200yr return period + 42% for climate change.**

The permeable hardstanding areas are proposed to have min. 500mm thk MOT type 3 (30% voids) subbase with an impermeable liner and finn drains or perforated pipes to discharge into the main network.

A fire containment basin has been provided with a minimum pool 500mm Deep. The basin is sized to hold a minimum of **180m³** in order to contain fire water run off for a 2h period, additionally the basin can hold **410m³** which will allow to store a 24hr 10year rainfall event if it were to coincide with a firefighting incident, therefore the total storage volume required in line with NFCC guidelines will be **590m³** within the proposed drainage network the basin is capable of storing **595m³** which is greater than the required.

A hydrobrake manhole fitted with a penstock is to be constructed on the outlet of the fire containment basin which will allow access to close the penstock and contain the system in event of a fire which will prevent any firefighting contaminated water run-off entering environment.

The infiltration basin has been designed using an infiltration rate of 0.19m/hr and an incoming flow of 4.5l/s (max) requiring a volume of **175m³** to be stored while infiltrating at max storm events.

General Notes

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2. Work to figured dimensions only.

3. This drawing is to be read in conjunction with all relevant Green Cat Renewables Ltd. drawings and specifications.

IMPORTANT

HEALTH, SAFETY & ENVIRONMENTAL INFORMATION

In addition to the hazards and risks normally associated with the type of work detailed on this drawing, please note the following additional risks to health and safety

Refer to designer risk assessment for all associated risks. Significant risks are noted again below.

Construction phase:

- Fire fighting run-off water is considered contaminated and must not be allowed to discharge freely to the environment.
- Any retained firewater within the containment pond would be subject to a programme of water quality monitoring. Sampling and analysis of the stored runoff would be undertaken to determine presence and extent of contamination. The results of this monitoring would inform the appropriate disposal route

SUDS management flow chart

Impermeable internal roads

Impermeable access road

Permeable Pavements

Gully

Filter Strip

Swale

Attenuation Basin

Infiltration Basin

Groundwater

Groundwater

LEGEND:

Permeable hardstand sub-base 500mm thk. MOT type clean stone min. 30% voids

Impermeable road construction

Battery storage units

Surface water pipes / Manholes

Surface water Perforated Pipe

Surface water run-off flow

Planning Boundary

P03 Site Layout Revised JS XX XX XX.05.26

P02 Fire Containment Basin JS AF CB 01.05.26

P01 First Issue JS AF CB 26.03.26

Rev	Description	Drm	Chk	App	Date
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Green Cat Renewables Ltd

Stobo House

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EH25 9RE

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Client

Energy Workshop

Project Title

Househill Battery Storage

Drawing Title

Proposed Drainage Layout

Status

Information

Scale @ size

1:750 @ A3

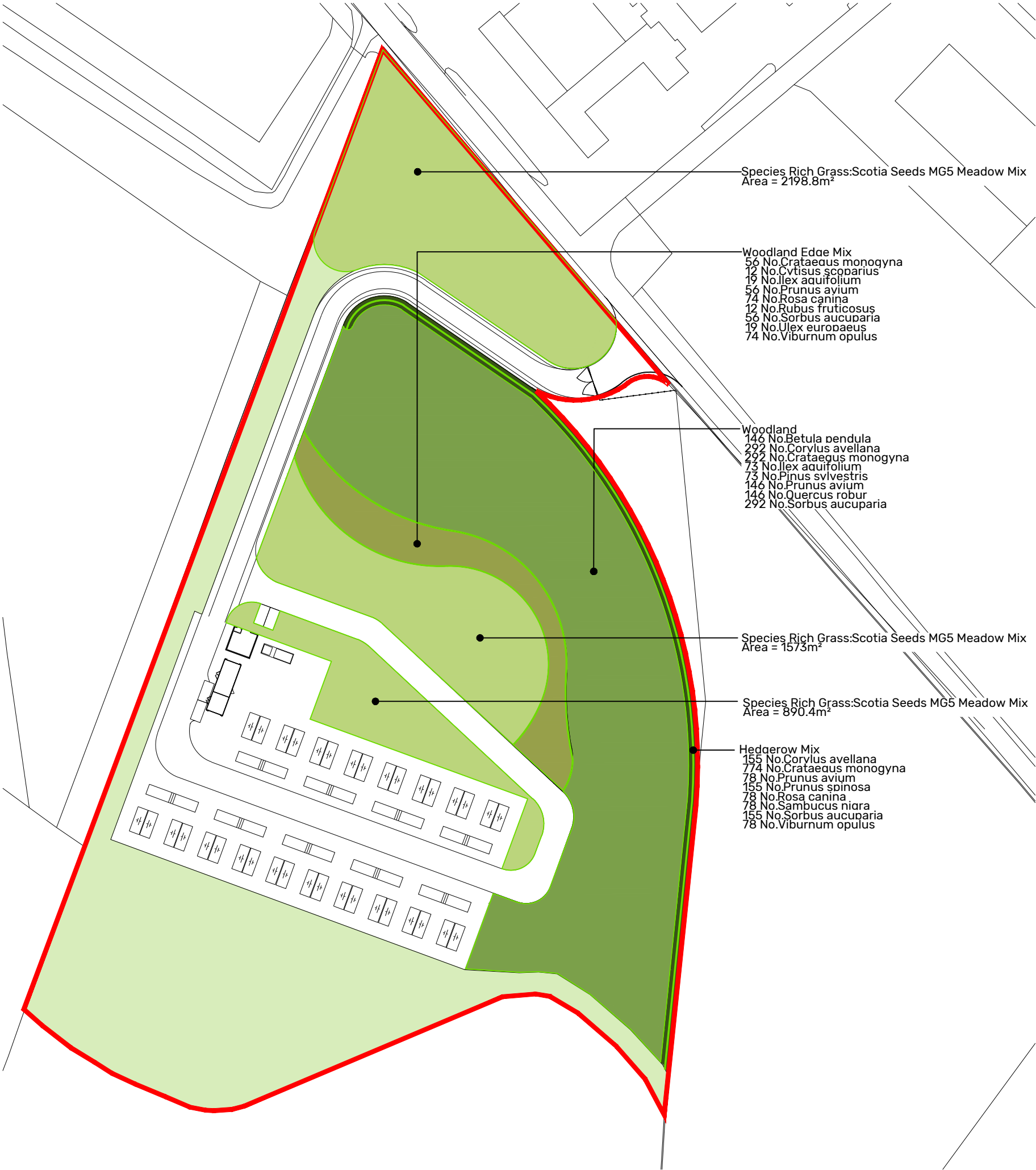
Revision

P03

Drawing Number

B7220-GCR-DR-GA-DR-P-0001

Project Code - Originator - Zone - Level - Type - Role - Number



OUTLINE PLANTING SPECIFICATION / ESTABLISHMENT

Generally:
All soft landscape operations are to be undertaken during the first available planting season, immediately following completion of all construction operations, or in accordance with any planning approval/conditions, whichever is most applicable.

Prior to planting, all earthworks associated with landscape operations are to be made good, levels graded to top of back of kerb and mounded as appropriate using approved topsoil as required.

Good quality site-won subsoil and topsoil to be used for planting/seeding. Species-rich grassland areas to be sown on low-nutrient subsoil/topsoil (subject to soil survey of site-won soils to be carried out by the contractor).

Areas to be cultivated (where services allow) to a minimum depth of 350mm. Remove all deleterious arisings from above cultivations, together with all surface debris currently on site including stones.

Topsoil depth to be 300mm (minimum of 150mm in grassed areas).

Finished levels of topsoil after settlement to be 50mm above adjacent hard paved areas in all instances.

Grassed Areas:
Species Rich Grassland: Scotia Seeds MG5 Meadow Mix sown at a rate of 3g/m². (Final species selection subject to ecological / soil assessment.)

Finished levels of topsoil after settlement are to be 50mm above adjacent hard paved areas in all instances.

Mulch - supply and spread minimum 75mm thick, thoroughly composted bark or equivalent organic mulch to a width of 1m centred on the hedgeline and an area of 1m² centred on each plant in the area of woodland and woodland edge planting.

Hedgerow and woodland planting to be protected against browsing by rabbits, deer, etc.

- Refer to the following British Standards for more detailed information:
- Code of practice for general landscape operations BS4428
 - Specifications for topsoil BS 3882:2015 Topsoil
 - Nursery Stock BS 3936 part 1.

Planting Schedule			
Grass Areas			
Description	Seed Mix Name	Seed Mix Supplier	Area
Species Rich Grass:	Scotia Seeds MG5 Meadow Mix	Scotia Seeds	4662.1137m²
			Total :4662.1137m²

Hedgerow Mix						
Species	Specification	Height	Density	Percentage Contribution	Number	
Corylus avellana	B: 1+1; Transplant - seed raised; branched; 2 brks	40-60	7/m	10%	155	
Crataegus monogyna	B: 1+1; Transplant - seed raised	40-60	7/m	50%	774	
Prunus avium	B: 1+1; Transplant - seed raised	40-60	7/m	5%	78	
Prunus spinosa	B: 1+1; Transplant - seed raised; branched; 2 brks	40-60	7/m	10%	155	
Rosa canina	B: 1+1; Transplant - seed raised; branched; 3 brks	60-80cm	7/m	5%	78	
Sambucus nigra	B: 1+1; Transplant - seed raised; branched; 3 brks	60-80cm	7/m	5%	78	
Sorbus aucuparia	B: 1+1; Transplant - seed raised	40-60	7/m	10%	155	
Viburnum opulus	B: 1+1; Transplant - seed raised; branched; 2 brks	40-60	7/m	5%	78	
7 plants per linear metre planted in double-staggered rows					Total :1551	

Woodland						
Species	Specification	Height	Pot Size	Density	Percentage Contribution	Number
Betula pendula	1+1; Transplant - seed raised :B	40-60		2Ctr	10%	146
Corylus avellana	1+1; Transplant - seed raised; branched; 2 brks :B	40-60		2Ctr	20%	292
Crataegus monogyna	B: 1+1; Transplant - seed raised	40-60		2Ctr	20%	292
Ilex aquifolium	Leader with laterals	40-60	2L	2Ctr	5%	73
Pinus sylvestris	B: 1+2; Transplant - seed raised	40-60		2Ctr	5%	73
Prunus avium	B: 1+1; Transplant - seed raised	40-60		2Ctr	10%	146
Quercus robur	B: 1+1; Transplant - seed raised	40-60		2Ctr	10%	146
Sorbus aucuparia	B: 1+1; Transplant - seed raised	40-60		2Ctr	20%	292
						Total :1460

Woodland Edge Mix						
Species	Specification	Height	Pot Size	Density	Percentage Contribution	Number
Crataegus monogyna	B: 1+1; Transplant - seed raised	40-60		1.5Ctr	15%	56
Cytisus scoparius	Bushy; 5 brks	40-60	2L	1.5Ctr	3%	12
Ilex aquifolium	Leader with laterals	40-60	2L	1.5Ctr	5%	19
Prunus avium	B: 1+1; Transplant - seed raised	40-60		1.5Ctr	15%	56
Rosa canina	B: 1+0; Seedling; branched	40-50		1.5Ctr	20%	74
Rubus fruticosus	B: 0/1; Cutting; branched; 2 brks			1.5Ctr	3%	12
Sorbus aucuparia	B: 1+1; Transplant - seed raised	40-60		1.5Ctr	15%	56
Ulex europaeus	Bushy; 3 brks	20-30cm	2L	1.5Ctr	5%	19
Viburnum opulus	B: 1+1; Transplant - seed raised; branched; 2 brks	40-60		1.5Ctr	20%	74
						Total :378

New Areas of Species Rich Grassland:
Ground Preparation: Effective weed control must be carried out prior to cultivation. Following this, the ground should be harrowed or raked to produce a medium tilth, and rolled or tread to produce a firm surface. The aim is to produce a firm, weed free, medium tilth, seed-bed.

Sowing: Sow in the autumn or the spring. Divide the quantity of seed and sow in two equal sowings at right angles to each other. The seed must be sown on the surface and can be applied by seed drill, seed fiddle, or broadcast by hand. Do not incorporate or cover the seed, but firm in with a roll, or by treading, to give good seed/soil contact.

Aftercare: Most of the sown meadow species are perennial and are slow to establish. Soon after sowing there will be a flush of annual weeds, arising from the soil seed bank. These should be cut in mid to late summer, especially if the mixture contains Yellow Rattle, or has been sown with a nurse of cornfield annuals. Then cut, remove and compost. The young meadow, can then be kept short by mowing through to the end of March of the following year. In the second growing season, and each year thereafter, leave the meadow uncut and un-grazed from the end of March to mid-summer, allowing the sown species to flower in June and July. After flowering, cut and remove the vegetation. This may be taken off as hay, or cut and stacked nearby to rot. The meadow may then be kept mown or grazed through to the end of March in the following year. The cutting date can be varied from year to year, bringing it forward to early July if the meadow becomes rank, or taking a later cut in early August if the structure is good. Perennial weeds can be controlled by selective scything or topping. Cut perennial weeds at flowering and before seed set.

New Hedgerow:
Bare root plants to be planted into a trench wide and deep enough to accommodate the root spread of the plant. Sides and bottom of trench to be loosened to facilitate root growth and drainage. Apply peat-free compost by thoroughly incorporating it with topsoil into the trench at a rate of one-thirds compost to two-thirds soil. Rootgrow to be applied to roots before planting. Settle plants into the soil, backfill and firm soil around plant. Water in thoroughly. Plants to be protected from rabbits and voles by Tubex easy wrap rabbit and vole guards (60cm) supported by a bamboo cane.

New Woodland and Woodland Edge:
Bare root plants should be planted using the notch planting method, with roots placed gently into the notch ensuring even distribution and no distortion of the roots. Ensure plants are left vertical and not bent to one side. Containerised plants should be planted in pits allowing at least 150mm greater than the diameter of the root ball for initial root growth. Water in thoroughly. Plants to be protected from rabbit and voles by Tubex easy wrap rabbit and vole guards (60cm) supported by a bamboo cane.

Deer Fencing:
All new hedgerow and woodland (inc. woodland edge) planting to be protected from deer browsing by 2.0m high wire mesh deer fencing (max mesh size 20cm x 15cm) pinned to pressure-treated timber posts. Suitably sized gates to be provided for maintenance access.

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NOTES

Native Hedge

Woodland

Species Rich Meadow

Woodland Edge

Habitat Enhancement Area (Allowed to naturally regenerate through self-seeding from adjacent woodland)

REVISION | P02 DATE | 22.05.26 BY | AA CHECKED | AC

Revised in accordance with updated Site layout

CLIENT The Energy Workshop Ltd

PROJECT Househill BESS Planting

TITLE Detailed Planting Plan

DWG No. N1832-ONE-ZZ-ZZ-DR-L-0201 REV P02

STATUS PRELIMINARY

SCALE 1:1000 @ A2 DATE 22.12.25 DRN BY NB

0102040metres1:1000