Agenda Item	8.3
Report No	PLN/052/26

HIGHLAND COUNCIL

Committee: North Planning Applications Committee

Date: 05 August 2026

Report Title: 25/03478/S36: Green Switch Capital Ltd.

Land 415M SW Of Shean Cottage, 10 Upper Dounreay, Thurso

Report By: Area Planning Manager – North

Purpose/Executive Summary

Description: Titan BESS - Battery Energy Storage Scheme (BESS) capable of exporting up to 500MW.

Ward: 02 - Thurso and North West Caithness

Development category: Section 36 Application

Reason referred to Committee: National Development

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

Recommendation

It is recommended that the Council **RAISE NO OBJECTION** to the proposal as set out in section 11 of the report.

1. PROPOSED DEVELOPMENT

1.1 The Highland Council has been consulted by the Scottish Government's Energy Consents Unit (ECU) on an application made under Section 36 of the Electricity Act 1989 (as amended) for the construction and operation of a Battery Energy Storage Scheme (BESS) with an installed capacity of up to 500MW, access, landscaping and associated ancillary works. Due to the installed capacity of over 50MW this proposal falls under the provisions of the Electricity Act.

1.2 Key elements of the development include:

BESS compound measuring 180m by 85m comprising:

- Up to 103 battery storage containers and associated transformers, maximum overall height of 2.9m.
- Ancillary infrastructure including underground ducting and cabling.

Substation compound measuring 40m by 55m comprising:

- 2 high voltage grid transformers up to 7m in height;
- Low level disconnectors up to 6.3m in height.

Elsewhere across the site:

- Earthworks to provide level platforms;
- Access arrangements including an access point from the public road, parking provision and 4m wide internal access tracks;
- Palisade perimeter security fencing measuring up to 2.4m;
- Acoustic barrier fencing measuring up to 3m in height;
- CCTV and lighting columns;
- 180,000L ($180m^3$) firefighting water tank up to 2.3m in height;
- Drainage infrastructure including an attenuation basin; and
- Landscaping and biodiversity mitigation / enhancement measures.

1.3 The proposed BESS would be to provide back-up electricity capacity to meet peaks in demand on the National Grid and used in response to calls for extra supply or absorb excess generation. Consequently, the equipment would not be in continuous use and may be called upon for a few minutes at a time, to several hours. BESS projects require to be located where they can be connected to the electricity network, at points which can provide the capacity for the required import and export of electricity. The BESS proposes to connect to the new Dounreay 2 Substation, as permitted under application 19/01092/FUL and situated approximately 2km northwest of the current application site, via underground cable which does not from part of this application.

1.4 The applicant submitted an Environmental Impact Assessment (EIA) Screening Request (24/03958/SCRE) to the Energy Consents Unit (ECU) on 12 August 2024. The ECU's response of 8 January 2025 confirmed that the proposal does not constitute EIA Development. The applicant's EIA screening opinion request included only the BESS proposals and the definition of the project at this stage, did not include the 2km underground cable route connecting to the new Dounreay 2 Substation. The relevance of that omission to the assessment of the proposed application is addressed

towards the end of Section 7 of this report, in the appraisal of other material considerations.

1.5 Whilst public consultation for Section 36 applications is not a statutory requirement, a Proposal of Application Notice (PAN) was submitted on 23 December 2024 (24/05329/PAN) and reported to North Planning Applications Committee on 13 March 2025 for noting. The applicant undertook two public consultation events at the Reay Village Hall on 31 January and 25 April 2025. The PAC Report submitted with the application outlines the public engagement undertaken and sets out how matters raised at these consultation events have been responded to.

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

- Pre-Application Consultation Report;
- Planning, Design and Access Statement;
- Landscape and Visual Appraisal;
- Biodiversity Net Gain Assessment;
- Ecological Impact Assessment;
- Outline Construction Environmental Management Plan;
- Heritage Impact Assessment;
- Flood Risk and Drainage Impact Assessment;
- Noise Impact Assessment;
- Transport Statement;
- Abnormal Loads Assessment; and
- Battery Safety Management Plan.

1.7 The Council issued an initial consultation response to the ECU during April 2026 raising objection; this was based on additional information being required to determine the landscape and visual impacts and fire safety implications of the proposals. The applicant consequently provided further information consisting of:

- Site sectional elevations;
- Clarification of the project drainage design and capacity; and
- Clarification on cumulative landscape and visual impacts and a cumulative Zone of Theoretical Visibility (ZTV).
- Further clarification on the nature of the grid connection, in the form of a Grid Connection Review Statement

2. SITE DESCRIPTION

2.1 The proposed development is located within an area of pastoral farmland and rough grazing, varying in quality in terms of the land capability classification for agriculture developed by Macaulay Land Use Research Institute (now the James Hutton Institute). The application site incorporates land designated as both Class 3.2 and 4.2 agricultural land, neither of which is considered as prime agricultural land. The site is bordered to the northeast by commercial plantation woodland and is surrounded on the other aspects by agricultural fields and access tracks.

2.2 The application site measures 14.5ha with the footprint of the proposed development comprising some 3.4ha. The applicant has confirmed in this respect, that the large

scale of the red line boundary area has evolved from the design process, to allow for flexibility to accommodate the proposed biodiversity enhancement measures onsite. The application site and surroundings slope gently down to the northeast between the 70m and 50m AOD contours. Cnoc Freiceadain forms the highest point adjacent the site at 132 m AOD, with the Hill of Shebster at 133m AOD prominent in the landscape to the southeast. It is proposed to access the site via a private road connecting to the Brae House Farm steading to the southeast and thereafter, to the C1001 public road, connecting to the A836.

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

- Brae House, to the southeast of the site, some 640m from the proposed development footprint; and
- Shean Cottage, northeast of the site, some 420m from the proposed development footprint.

2.4 There are no natural or cultural heritage designations present within the site boundary. The closest designated site is the North Caithness Cliffs Special Protection Area (SPA), designated its breeding seabird assemblage, located approximately 2.7 km north-west of the site at its closest point.

2.5 There are no landscape planning designations within the site or its immediate setting, with the nearest being the Farr Bay, Strathy and Portskerra Special Landscape Area (SLA) number 3, some 10km distant to the west. The site is located wholly within Landscape Character Type (LCT) 143 Farmed Lowland Plain. Whilst the character of the locale is rural in nature, existing electricity generation, transmission and distribution infrastructure is prominent in the surroundings.

3. PLANNING HISTORY

On Site

3.1	13 Mar 2025	24/05329/PAN - Proposed installation of a Battery Energy Storage Scheme (BESS) capable of exporting up to 500 megawatts (MW) on land approximately 1.65 kilometres (km) southeast of Lower Dounreay.	PAN Reported to Committee
3.2	3 Dec 2024	24/03958/SCRE - Battery Energy Storage Scheme (BESS) capable of exporting up to 500MW	EIA Screening Response Issued – EIA not Required

Relevant Energy Related Development in Surrounding Area

3.3	31 Jan 2025	24/01669/FUL - Erection and operation of a 34MW capacity battery energy storage facility (BESS) with ancillary infrastructure	Planning Permission Granted

3.4	17 Sep 2019	19/01092/FUL – Dounreay Substation - Erection of 275/220 kV electricity substation comprising platform area, electrical infrastructure and buildings, associated plant, ancillary infrastructure and temporary site compound	Planning Permission Granted
3.5	01 May 2013	13/00636/OHL - Installation of 275KV Transmission Line from Dounreay - Spittal	Section 37 – Raise no Objection – Approved by Scottish Minsters
3.6	14 Jan 2010	04/00342/S36CA – Baillie Windfarm - Erection of 21 wind turbines 70 metres to hub and associated infrastructure	Section 36 – Approved by Scottish Minsters

4. PUBLIC PARTICIPATION

4.1 Advertised: Section 36 Application

Date Advertised:

- The Herald – 12 September and 19 September 2025
- Edinburgh Gazette – 12 September and 16 September 2025
- Caithness Courier - 17 September and 24 September 2025
- John O'Groats Journal - 12 September and 19 September 2025

Representation Deadline: 29 October 2025

Representations Received by The Highland Council: 0

Representations Received by The Energy Consents Unit: 0

5. CONSULTATIONS

Consultations undertaken by The Highland Council

5.1 **Caithness West Community Council (host)** did not respond to the consultation.

5.2 **Castletown Community Council** did not respond to the consultation.

5.3 **Halkirk and District Community Council** did not respond to the consultation.

5.4 **Melvich Community Council** did not respond to the consultation.

5.5 **Access Officer** does not object to the application. There is not expected to any direct impact on recreational public access by this proposal and the visual impacts from the nearby Core Path at Cnoc Freiceadain and nearby adopted roads used for cycling have been adequately assessed in the application supporting documents.

5.6 **Community Wealth Building Team** have been notified of the application and will contact the applicant separately regarding the Highland Social Values Charter.

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

5.8 **Environmental Heath** do not object to the application. The proposed development is set in a predominantly rural area and there is potential for disturbance to sensitive premises from noise unless appropriate mitigation measures are implemented. In this respect, Environmental Health require a Construction Noise and Vibration Management Plan and finalised Noise Impact Assessment, secured via planning condition.

5.9 **Flood Risk Management Team** does not object to the application following a further response to their initial concerns over lack of drainage information. A detailed Drainage Impact Assessment will be required via planning condition.

5.10 **Forestry Officer** does not object to the application. The proposed development does not appear to impact on any trees or woodland of merit.

5.11 **Historic Environment Team (Archaeology)** does not object to the application. The applicants Heritage Impact Assessment is considered to provide an acceptable level of detail and the mitigation suggested is appropriate and can be agreed. A standard condition to secure an archaeological Written Scheme of Investigation (WSI) is recommended.

5.12 **Historic Environment Team (Conservation)** does not object to the application. Due to the location of the proposals, they do not impact on the settings of Category B and C listed buildings in the area. Measures should be taken to integrate the proposals into the landscape, including the use of recessive colours.

5.13 **Landscape Officer** does not object to the application. Largely agrees with the LVA and it generally accords with best practice guidance. However, considers that there is an under-assessment of effects on the 'host' landscape character but agrees with the visual and cumulative effects during construction and operation of the proposed development. The proposed landscape mitigation would further screen the proposed development by year 10, from low-lying receptors.

5.14 **Transport Planning Team** does not object to the application, but raised comments related to the level of detail provided in the applicant's Transport Statement. Transport Planning require conditions securing a Construction Traffic Management Plan, Abnormal Loads Plan, an assessment of road structures, a Road Mitigation Scheme on the C1001 and Section 96 Wear and Tear Agreement to be attached to any planning permission in respect of the proposals.

Consultations Undertaken by the Scottish Government's Energy Consents Unit

5.15 **British Telecom objects to the application** based on potential interference to their current and planned radio network.

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

5.17 **Historic Environment Scotland** do not object to the application. HES raised concerns over the impacts of the proposals on the setting of scheduled monuments Cnoc Freiceadain, long cairns (SM90078) and Hill of Shebster, chambered cairn (SM476). Whilst impacts on the setting of these monuments are significant, HES are satisfied however, that they will remain capable of being understood and appreciated and experienced for their commanding position within the landscape and that their key factors of setting will remain intact.

5.18 **Joint Radio Company** do not object to the application.

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

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

5.21 **NatureScot** do not object to the application. It is considered unlikely that the proposals will have a significant effect on the qualifying interests of designated European sites in the surrounding area and NatureScot is generally in agreement with the findings of the applicant's assessment related to these interests.

5.22 **RPSB** do not object to the application. RSPB commented on the applicant's proposals for biodiversity enhancement in light of the presence of birds of conservation concern understood to be breeding on or near the application site.

5.23 **Scottish Environment Protection Agency (SEPA)** do not object to the application, noting their standing advice for such development.

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

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

5.26 **Scottish and Southern Electricity Networks (SSEN)** do not object to the application.

5.27 **Scottish Water** do not object to the application. The applicant must identify any potential conflicts with Scottish Water assets and contact the Asset Impact Team for an appraisal of the proposals.

5.28 **Transport Scotland** do not object to the application, subject to conditions to secure a finalised Construction Traffic Management Plan, and a detailed Abnormal Loads Assessment. Several advisory notes setting out requirements relating to works within the trunk road network have been provided.

6. DEVELOPMENT PLAN POLICY AND OTHER MATERIAL POLICY CONSIDERATIONS

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

7. PLANNING APPRAISAL

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

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

- have regard to the desirability of preserving natural beauty, of conserving flora, fauna and geological or physiographical features of special interest and of protecting sites, buildings, and objects of architectural, historic or archaeological interest; and

- reasonably mitigate any effect which the proposals would have on the natural beauty of the countryside or on any such flora, fauna, features, sites, buildings or objects.

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

Planning Considerations

7.4 The key considerations in this case are:

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

b) Energy and Carbon Saving;

c) Socio-Economic Impacts;

d) Siting and Design

e) Landscape and Visual Impact;

f) Habitats and Protected Species;

g) Built Heritage;

h) Amenity;

i) Health and Safety;

j) Traffic and Transport;

k) Flood Risk and Drainage;

l) Decommissioning and Reinstatement; and

m) Other Material Considerations.

Development Plan / Other Planning Policy

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

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

7.7 NPF4 considers that Strategic Renewable Electricity Generation and Transmission Infrastructure will assist in the delivery of the Spatial Strategy and Spatial Priorities for the north of Scotland, and, that Highland can continue to make a strong contribution toward meeting Scotland's ambition for net zero. Alongside these ambitions, the strategy for Highland aims to protect environmental assets as well as deliver on other policy considerations. These are assessed in the following sections of this report, which set out that the proposal is generally, in conformity with the provisions of the development plan.

Energy and Carbon Saving

7.8 The Council continues to respond positively to the Scottish Government's renewable energy agenda. The Highland region offers significant opportunities for BESS given onshore wind energy developments in Highland accounts for around 30% of the national installed onshore wind energy capacity along with pumped hydro storage under construction and other renewable energy sources further diversifying the mix of renewable energy to be fed into the electricity grid.

7.9 The proposal would be interconnected to the grid's transmission / distribution network via the Dounreay 2 substation, currently under construction and some 2km northwest of the site. The most likely form of this connection would be an underground cable. The development would collect energy from the grid when the supply outstrips demand. Such facilities make a commercial return by buying electricity from the grid when rates are cheaper and selling it back to the grid when rates are more expensive. However, the development will also provide electricity or other grid services when needed. Depending on the mix of electricity at the time of collection, the BESS facility may or may not be storing and then releasing renewable energy. That said, all

electricity generation in the region comes from renewable sources and therefore the proposal is therefore, considered to “regenerate” renewable energy.

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

7.11 Notwithstanding any impacts that this proposal may have upon the landscape resource, amenity and heritage of the area, the development is considered compatible with Scottish Government policy and guidance, making a substantial contribution to meeting the Government, UK and European energy targets, with the development having the potential to store / release renewable energy with an installed capacity of up to 500MW. This is a substantially larger capacity than most BESS facilities proposed in Highland to date.

Socio-Economic Impacts

7.12 Energy storage facilities are an emergent technology and are expected to be a significant component of national energy infrastructure in the coming years and are therefore, expected to support jobs and economic development. The Council has worked with public, private, and community partners to develop its priorities through the Highland Outcome Improvement Plan 2024-2027. This Plan has a vision to maximise opportunities and tackle inequality to build a thriving Highlands for all and includes three high level strategic priorities around people, place and prosperity. A Community Wealth Building Strategy was approved in September 2024. It provides an alternative approach to economic development and a practical response that aims to keep wealth within a local area. It aims to ensure every area and community can participate in, and benefit from, economic activity. The ongoing Local Place Plans initiative will likely identify other local opportunities too. The Council’s position on Community Benefits has recently been updated with the approval of a “Social Values Charter for Renewables Investment” (June 2024). The charter sets out The Highland Council’s expectations from developers wishing to invest in renewables related projects in the Highland area and what the Highland partnership will do to support and enable this contribution, namely:

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

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

- Maximise local economic impact and employment;
- Prioritise local employment and supply chain opportunities along with promoting environmental stewardship;

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

7.14 The proposed development anticipates a construction period of up to 1.5 years. There are likely to be adverse effects caused by construction traffic and disruption, particularly during the construction phase when abnormal loads are being delivered to site. Such projects can offer investment and opportunities to the local, Highland, and Scottish economy, including businesses ranging across the construction, haulage, electrical and service sectors.

7.15 The applicant's Planning, Design and Access Statement submitted in support of the application provides an outline of the anticipated socio-economic benefits with the majority of these expected to be realised during the construction phase. It is anticipated that the construction phase would generate a minimum of 30 jobs on-site, which would equate to a GVA of approximately £1.94 million per annum.

7.16 The applicant had initially noted that they will seek to establish a Community Benefit Fund that may be used for local projects, grants and/or donations to local organisations or groups within the vicinity of the development. Owing to the nature of community benefit, which is voluntary in nature, it is not deemed a material planning consideration and is separate to the planning process that will be progressed by Highland Council's Community Wealth Building Team who liaise directly with applicants on this matter. The applicant has since, issued a Social Value Charter Statement dated July 2026, which notes that while the size of the fund has not yet been finalised, they are committed to providing a minimum one-off payment, of £700/MW, which would equate to a total fund value of £350,000, based on the proposed 500 MW capacity.

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

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

recommendation before Committee is to include such a condition to maximise the socio-economic benefits of the proposed development.

Siting and Design

7.19 The location was identified following confirmation that a point of connection to the electricity grid at the new Dounreay 2 substation. Specific site selection was informed by a number of key factors including connectivity to the grid, land availability, lack of environmental constraints, limited visual impact and suitable access requirements.

7.20 In this respect, the applicant has sought to avoid a location which would be visually dominant within the rural landscape from surrounding receptors. The proposed development benefits from being sited in a relatively sparsely populated location, not located within any natural heritage or landscape designations. It is also situated within an area with existing electrical infrastructure including the Bailie Wind Farm to the east and Limekiln Wind Farm to the southwest, alongside both wood pole electrical distribution lines and steel lattice transmission lines, that pass adjacent to the site.

7.21 A relatively utilitarian design is proposed with equipment being of a functional appearance as dictated by operational and / or health and safety requirements. This site will comprise a three-tiered arrangement with the battery and substation compounds linked via an internal access track that connects to the public road to the south of the site boundary.

7.22 Individual battery units comprise of metal cabinets enclosing lithium-ion batteries and associated equipment. These will be enclosed within 103 battery containers measuring 6.00m in width by 2.4m in depth by 2.9m high and incorporating 5 battery units each. Each battery container will be serviced by an adjacent ‘MV skid’ housing power conversion systems and transformers, each measuring 6.00m in width by 2.4m in depth by 2.9m high.

7.23 Whilst the exact number of individual battery storage containers will depend upon the battery technology that is available at the time of construction, the specification as proposed on the site layout shows 103 battery containers, similar to shipping containers, laid out in rows of 34, 34, and 35 containers across the site in three groups from south to north.

7.24 To enable safe gradients during construction and operation, earthworks are proposed to ensure battery compounds are accommodated on generally flat platforms. The site has been designed to minimise cut and fill materials. The substation, which represents the tallest infrastructure, has been located on the lower, western part of the site, minimising the visual impacts. A minimum separation of 50m is maintained between the operational elements of the site and the overhead electricity distribution and transmission lines in the area.

7.25 This substation compound accommodates electrical infrastructure including 2 high voltage grid transformers and air-insulated switchgear. This equipment will enable the import and export of electricity from Dounreay 2 substation. Control rooms for both the site and transmission operators are also located on the boundary of the substation compound, with welfare facilities for use during maintenance events. The site operator / customer building is of a flat roofed, rectangular design in plan, measuring 12.33m

in width by 3.97m in depth by 4.19m in height. The transmission operator building is of a mono pitched roofed design measuring 7.34m in width by 5.89 m in depth with a roof ridge height of 4.21m.

7.26 BESS technology is continuously evolving and whilst the fundamental components are well established the exact specifications can vary between projects and technology providers. The dimensions noted represent current design, however, as with other renewable technology, further refinements may occur as the detailed design progresses. The finalised design and specification of BESS infrastructure is therefore expected to be controlled by condition.

Landscape and Visual Impact

7.27 The applicant has submitted a Landscape and Visual Appraisal (LVA) which evaluates landscape and visual effects that would result from the construction and operation of the proposed development. The appraisal broadly follows the Landscape Institute's '*Guidance on Landscape and Visual Impact Assessment'*, Third Edition, 2013 (GLVIA 3). An appraisal of effects has been conducted based on a combination of the sensitivity of landscape and visual receptors, and the magnitude of change that would occur as a result of the proposed development. The effects are identified by establishing and describing the changes to the landscape and visual baseline resulting from the different components of the proposed development and the resulting effects on individual landscape or visual receptors. The LVA is accompanied by a number of figures and visualisations from six viewpoints to represent a range of views experienced by a range of receptors within the study area.

7.28 The LVA includes an appraisal of the Landscape Character Types (LCTs). Landscape character is the distinctive and identifiable pattern of elements that occur consistently in a particular type of landscape and the way that this pattern is perceived. Effects on landscape character can occur both on the site, where the pattern of elements that characterise, the landscape would be directly altered by the addition of the proposed development, and outwith the site in the wider study area, where visibility of the proposed development may alter the way in which this pattern of elements is perceived. The site is located within the Nature Scot Landscape Character Type (LCT) 143: Farmed Lowland Plain. The site is not located within any landscape designations. There is no intervisibility between the proposed development and the Farr Bay, Strathy and Portskerra, and Dunnet Head Special Landscape Areas (SLAs) located over 10km to the west, nor the Kyle of Tongue National Scenic Area (NSA) located over 25km to the west, although limited visibility may be possible within the East Halladale Flows Wild Land Area (WLA) 39, which is located some 4.5km southwest of the site at its closest point.

7.29 The Farmed Lowland Plain LCT is characterised by a broad and relatively low-lying plain, gently undulating to form shallow valleys and subtle low ridges. Occasional smooth hills rise above the more low-lying plain forming local landmarks. The predominant land cover is agriculture. During construction the applicant considers notable landscape effects on the 'host' LCT would be limited to areas within relatively close proximity of the site. Construction stage effects would be short term and temporary. Local effects during peak construction stages are predicted to incur a minor adverse effect (Slight magnitude of change) upon the Farmed Lowland Plain LCT. Officers however consider that the magnitude of change during the construction would

be Moderate resulting in a Moderate adverse effect. The introduction of the proposed development would result in direct, relatively moderate landscape change experienced at a localised level. Visibility of construction activities and the introduction of the main components of the proposed development would be limited beyond the more immediate context particularly to the northwest, west and south, and screening by intervening landform and coniferous forestry from the north and further to the southeast. The creation of the proposed bunding would aid to screen views from the further afield. The localised loss of pastoral vegetation would not extend beyond the site to the wider extents of the LCT. The disturbance necessary to facilitate construction would be partially reversible. However, the main components constructed during this phase would remain into the operational phase. During the operational phase, the applicant considers that the proposed development would continue to have a slight magnitude of change and a Minor adverse effect on a small proportion of the LCT. As with the construction phase, officers consider that the magnitude of change would be Moderate resulting in a Moderate adverse effect. The implemented bund features replicate the undulation of the landscape and the planting mixes upon them are generally characteristic of the LCT and would not alter the openness of the landscape. Nevertheless, the nature of the proposed development would alter the landscape character at a local level. Wider indirect effects on landscape character in the LCT would be limited to areas from where the proposed development would be visible. The ZTV indicates theoretical visibility from the northwest, north, west, south and east, although some views from the north and south would be screened by intervening coniferous forestry.

7.30 External lighting would be required to be fitted to CCTV columns and battery containers but would not be used during normal operations and would be activated only when maintenance staff require to be present on site or by motion sensors in the event of a security breach. Lighting would be low level directional LED lighting with shrouds to prevent upwards light spillage. As a result, it is considered that would be no notable effects on the night-time character of the landscape during the hours of darkness.

7.31 Longer term, the applicant considers that native scrub and tree planting along with natural shaped bunds of 2-3m high would be effective in substantially screening the infrastructure within the landscape. The planting would comprise neutral species rich grassland with scattered trees and groups of scrub and a mixed native plant screen. Planting would also help reinforce local landscape character. Local visual character would be altered, with certain existing views foreshortened or partially screened, although those changes are not considered to be detrimental. An attenuation basin with a native wetland edge would be located in the northeastern portion of the site. This would offer opportunities for additional screening surrounding the attenuation basin. An acoustic fence, proposed to be 3 m high, is proposed to the northeast and southeast of the BESS compound. This is to reduce potential noise related impacts to surrounding receptors but also affords instant screening for the Site from receptors to the east.

7.32 Theoretical visibility of the proposed development would result for visual receptors on the A836 and U2037 public roads to the northwest of the application site. The proposals in this regard, would represent an extension of the presence of electricity related development in the landscape, albeit with low lying infrastructure. As

evidenced by the applicant's visualisations from Viewpoints 1 (A836, Upper Dounreay) and 2 (Upper Dounreay Road) respectively, views looking to the site would generally be oblique and would take place in the context of occasional taller intervening energy infrastructure, namely an electricity line supported on steel lattice towers, that runs from southeast to northwest just to the south of the application site, connecting into the Dounreay Facility. These effects of Minor adverse are agreed.

7.33 The proposals would be accessed from the C1001 public road, which runs approximately 0.6m from the BESS compound at its closets point to the south. The C1001 is also a designated long distance cycle route at this point, between Inverness and John O Groat's. Theoretical visibility from the C1001 is intermittent due to topography and views toward the site would again, be oblique from this route for drivers and cyclist receptors. The overall effects would be Minor adverse. experienced for relatively short durations; estimated from site visits to be up to 1 minute for vehicle drivers and passengers. Durations would, however, be longer for cycle traffic, estimated at lasting for up to 5 minutes.

7.34 Whilst there would be some visual effects during the construction phase, it is agreed that these effects are localised and relatively well contained. During the operational phase, the higher parts of the infrastructure, particularly the substation elements and fire water tank, would be visible for residential receptors in the north and west and road-based receptors to the south, northwest and north and would represent a modest alteration to some of the key components of the view, albeit with existing intervening vegetation moderating the degree of alteration to key components of the view. The proposed development would not break the skyline or direct views to the Hill of Shebster to the southeast of the site. In addition, a screening bund would be formed along the southern edge of the site, facing the C1001 public road, which in time, would help to naturalise the presence of the proposed development within the landscape when viewed from this route.

7.35 Post construction and at the start of operation the majority of views would have a Minor adverse effect due to either the level of exposure from the top of the Hills or views across from the properties at Lochside, highlighting infrastructure not common to the view. There would be Minor effects where the proposed screening bunds act to screen the majority of the views, even with the vegetation not fully established upon them. A836, Upper Dounreay is likely to have no effects post construction during year one, due to the existing intervening screening completely filtering views from this receptor

7.36 In the longer term, established tree and scrub planting and natural bunding would be effective in significantly filtering or screening views to the taller elements of the proposals including the substation and fire water tank when seen from some of the low-lying viewpoints such as from 5 North Way. The applicant's assessment concludes that in the long term, the proposed development would result in a residual Minor adverse visual effect. This is agreed. It is, however, unlikely that the two Hill views (Cnoc Freiceadain and the Hill of Shebster), would reduce due to the mitigation as the infrastructure still being visible from these areas and from Upper Dounreay. Whilst the ZTV illustrates some theoretical visibility beyond 2km, the proposed development would be barely discernible at these distances given its low-lying components and combined with the embedded mitigation would result in no greater than Minor adverse effects.

7.37 In addition to the above, it is important to consider the context of the development in combination with other developments and assess the likely cumulative effects. The cumulative assessment considers the cumulative landscape and visual effects of the development in association with existing and consented developments in the area, including existing windfarms and electricity transmission and distribution infrastructure and other BESS development, including the Reay proposals, as granted planning permission in 2025 under reference 24/01669/FUL. While the proposed development would contribute to increasing the influence of electricity infrastructure in the surrounding landscape, the potential for any notable cumulative effects from the proposed development is limited, given the separation between the BESS developments in the area and the greater prominence of wind energy and transmission infrastructure within the landscape. As a result, considering the geographical separation of the surrounding developments within the study area, the proposed development would result in localised cumulative effects.

Habitats and Protected Species

7.38 A preliminary ecological appraisal of the site was undertaken by the applicant in September 2024. The main habitats on site comprise of modified grassland with some mixed woodland and gorse scrub. No UK Biodiversity Action Plan (UK BAP) priority habitats are present on site. The site was assessed as suitable for supporting nesting birds, especially within the woodland and scrub areas. No evidence of protected species was recorded within the development boundary; however, it was assessed as capable of supporting badgers, invertebrates, reptiles, amphibians and potentially foraging bat species. A pond is located in the northern part of the site, but shallow water levels and continuing disturbance make it suboptimal for amphibians.

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

7.40 Highland Council's Ecology Team welcome the suggestions for habitat creation and have suggested adding suitable forage flowering plants for Great Yellow Bumblebee where appropriate, on site, with the implementation of this to be controlled by condition securing a Habitat Management Plan (HMP).

7.41 An Outline Construction Environment Management Plan (OCEMP) has been submitted, the delivery of which, along with the requirement for an Environmental Management and Pollution Prevention Plan can be conditioned. A condition would also secure the implementation of the site's Habitat Management Plan (HMP) which will require to be in place for a minimum of 30 years, reflecting the anticipated operational lifetime of the development. The Ecology Team has also requested conditions controlling the submission of pre-construction surveys, surveys of nesting

birds prior to construction and GIS shapefile data. An Environmental Clerk of Works (EnvCoW) will be appointed to oversee the project along with a Planning Monitoring Officer to oversee compliance with the conditions attached to any consent.

7.42 No peat is found on site, as such, there are no predicted effects on peatland resources. Whilst the site has previously been used for agricultural purposes and is currently used as an agricultural field it is not classed as prime agricultural land (the site is Class 4.2 and 3.2 and prime land is defined as Classes 1 to 3.1), or land that is culturally or locally important for primary use.

7.43 In their consultation response, NatureScot consider it unlikely that the proposals will have a significant effect on the qualifying interests of designated European sites in the surrounding area and are generally in agreement with the findings of the applicant's assessment related to these interests. For both Caithness Lochs Special Protection Area (SPA) and the North Caithness Cliffs SPA, it is unlikely that the proposal will have a significant effect on any qualifying interests either directly or indirectly. An appropriate assessment is therefore not required in respect of these sites. Impacts on the predatory bird and seabird qualifying interests of the East Caithness Cliffs SPA through loss of foraging habitat are considered unlikely. For more distant Sites of Special Scientific Interest (SSSIs) within the Caithness Lochs SPA, distance and lack of hydrological connectivity results that impacts on qualifying interests are again, considered unlikely.

7.44 The Ecology Team note that any clearance of vegetation should be undertaken outwith the breeding bird season (between March to August, inclusive). Any clearance within these months will require a nesting bird check undertaken by a suitably experienced ecologist. Overall, the proposal is agreed to be well sited from a habitat perspective, avoiding priority natural habitats in favour of modified grassland, that constitutes non-prime agricultural land. The proposals also have the potential to deliver meaningful enhancement on site, by enhancing an area of the modified grassland habitat and creating a more species-rich neutral grassland within the site. The addition of the proposed infiltration basin in the northwest part of the site will also diversify the habitat offer in the area. Furthermore, barn owl will be targeted through the provision of a nesting box for this species, on the northeastern site boundary, closest to existing wooded areas. The finalised Habitat Management Plan measures will be confirmed in consultation with the Ecology Team and are expected to incorporate their suggestion of adding suitable forage flowering plants for Great Yellow Bumblebee where appropriate, on site.

Built Heritage

7.45 The applicant's Heritage Impact Assessment identified a high potential for prehistoric and post medieval and modern archaeological remains to be found on site. For most of the designated cultural heritage assets within the study area, no or neutral impacts upon their settings are predicted. Although many of these assets will have some level of intervisibility with the proposed BESS, it is not predicted that this would diminish or enhance any ability to understand, appreciate and experience the significance of the assets. Low-level impacts on the settings of the Scheduled Monuments Cnoc Freiceadain Long Cairns (SM90078), some 705m northeast of the main site red line boundary at its closest point and the Achunabust Broch (SM513), some 775m southwest of the main site red line boundary, are identified. The applicant's

assessment also contends that neutral impacts on the setting of the Hill of Shebster Chambered Cairn (SM476), some 1km southeast of the main site red line boundary, would result.

7.46 Cnoc Freiceadain Long Cairns (SM90078) comprise 2 unexcavated long-horned burial cairns positioned at right angles on the summit of Cnoc Freiceadain and dated to the first half of the 4th millennium BC. The position of the cairns on the hilltop would have been deliberate with the intention that the cairns were to be visible from across the surrounding landscape and to have links with a number of other monuments within the immediate landscape of Caithness. The applicant's assessment concludes that the proposed BESS is not likely to compete with the cairns as a landscape feature, due to their position at approximately 60m higher than the site. Achunabust Broch (SM513) is located on a hillock within open farmland and originally would have been constructed to have 360° views of the surrounding landscape and also, to act as a visible landmark. The applicant's assessment concludes for this asset, that the proposed BESS will again, not directly compete with the Broch as a landscape feature. In relation to both features, the applicant's assessment considers that the proposals in operation, would not result in substantial effects on their settings, due to the limited scale of the proposals relative to other large electricity infrastructure in the area. The Hill of Shebster Chambered Cairn (SM476) consists of a round cairn approximately 26m in diameter. The commanding position of the cairn on the hilltop would have been deliberate with the intention that it would be visible from across the surrounding landscape and to have links with a number of other monuments within the immediate landscape of Caithness, including the Cnoc Freiceadain Long Cairns to the north. The applicant's assessment concludes that the proposals would result in only a neutral impact to the monument's setting, it being considered that the scale of the BESS would not affect viewers ability to appreciate the contribution the monument's setting makes to significance of the cairn, which is largely derived from its hilltop location and prominence as a landmark.

7.47 In their consultation response, Historic Environment Scotland did not object to the application. HES did, however, raise concerns over the impacts of the proposals on the setting of the Cnoc Freiceadain long cairns and Hill of Shebster chambered cairn. In the former case, HES note that key factors of the long cairns setting are its commanding views in all directions. Although there is existing windfarm infrastructure to the east of the monument, pylons to the south, and Dounreay on the coastline, the outward views between and to the west and north remain open, being wide and rural in character. The applicant's cultural heritage visualisations suggest that there would be extensive visibility of the proposed BESS from the long cairns, resulting in a change to the open and rural character that currently forms a key factor of the monument's setting. Whilst these impacts on setting are significant, the difference in elevation and the distance between the monument and the development site means that the monument will remain capable of being understood and appreciated and experienced for its commanding position. On balance its key factors of setting are likely to remain sufficiently intact, that HES does not consider that an objection is merited.

7.48 With respect to the Hill of Shebster chambered cairn, HES notes that key factors of its setting include commanding views out in almost all directions as well as visual relationship to the long cairns at Cnoc Freiceadain discussed above. Although there is existing windfarm infrastructure to the east of the monument, and pylons to the

north, the outward views, especially to the west, remain relatively open and wide. Whilst the proposed BESS is low in height, its industrial nature is likely to be highly visible in these important views and change the character of the monument's surroundings. Whilst these impacts on setting are significant, the difference in elevation and the distance between the monument and the development site means that the monument will remain capable of being understood and appreciated and experienced for its commanding position. On balance, its key factors of setting are likely to remain sufficiently intact that again, HES does not consider that an objection is merited. Otherwise, due to the location of the proposals, they do not impact on the settings of other local heritage assets in the area, within the remit of the Highland Council's Historic Environment Team (Conservation).

7.49 As such, the Historic Environment Team (Archaeology) also has no objections to the proposed development, subject to the submission of a detailed archaeological Written Scheme of Investigation and the use of recessive colours to help integrate the proposals into the landscape, which can both be secured via condition.

Amenity

7.50 There is likely to be some disruption during the anticipated construction period. Developers and contractors must comply with reasonable operational practices regarding construction noise so as not to cause nuisance in any case, as required by Section 60 of the Control of Pollution Act 1974, which is regulated by Environmental Health. Working hours on the construction site and deliveries are to be restricted to 08.00 – 19.00 Monday to Saturday with no Sunday or Public Holiday working or deliveries. Construction activities that do not generate impacts beyond the site boundary would be permissible outwith these hours. A condition is attached to secure a Construction Nosie and Vibration Management Plan (CNVMP) in this respect.

7.51 In terms of the facility's operation, the BESS proposal employs inverters, switchgear, transformers and batteries, with the battery storage containers also fitted with air cooling units at low level on the sides of each container. As such, the operation of the facility will create a degree of noise with potential to impact residential amenity given there are 6 residential properties in proximity designated as Noise Sensitive Receptors (NSRs), the nearest to the site red line boundary area being 'Brae House', to the southeast of the site, some 640m from the proposed development footprint and 'Shean Cottage', northeast of the site, some 420m from the proposed development footprint. The applicant's data within their Noise Impact Assessment (NIA) shows that the noise level exceeds background levels at nighttime hours at both of these receptors. However, given the context of the locality and the anticipated noise levels, together with the applicant's suggested mitigation, in the form of earth bunding and noise barriers around the site perimeter, the NIA concludes that the proposals would not represent a change that would impact on external amenity level of the properties or disturbance to sleep. Following review of the applicant's assessment, Environmental Health have advised that planning conditions are required to secure a revised NIA including details of the specified plant to be installed and further details of control measures and mitigation to ensure that noise from operation of the proposals does not exceed background sound levels, as measured or calculated at the relevant residential NSRs. This requirement is due to BESS technology continuously evolving, with the exact specifications of plant to be used and associated mitigation, to be confirmed with the applicant via condition, should Section 36 consent be granted. In

this respect, the applicant currently proposes a 3m high acoustic fence around the northern site boundary, full details of which, may be secured via condition.

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

Health and Safety

7.53 The battery cabinets would consist of steel enclosures, with the predicted battery technology type being lithium-ion-phosphate, or LFP. Each battery container will include fire detection and suppression systems. The National Fire Chiefs Council (NFCC) Guidance has, of December 2025, been published in an updated form. The Guidance points to different design approaches that may lead to different spacing requirements, and it does not specify a minimum distance in terms of layout. The applicant proposes a separation distance of 3m between groups of units, designed to prevent any spread of fire between them. The battery units would be remotely monitored on a 24/7 basis and any malfunction or thermal issue in one would be immediately detected and the relevant component shut down. The submission includes details of health and safety arrangements and fire suppression. The design and layout have been proposed to ensure that a runaway fire in one of the battery units would not spread to other units. In the event of a fire within an individual unit, a venting system is designed to prevent flammable gases from building up, assisting with firefighting, and preventing any potential risk of explosion from combustion products when exposed to the air. Monitoring of individual cell temperatures forms part of the management of the site.

7.54 A firefighting and emergency strategy would be agreed with Scottish Fire and Rescue once final technical specifications are known. At a recent appeal case, where a Reporter upheld an appeal against THC's refusal of planning permission for a BESS at Kilmorack near Beauly (PPA-270-2310), the Reporter observed that he did not consider that the specific matters of fire risk and the fire safety standards of battery energy storage systems to be directly planning considerations. The Reporter concluded that matters related to management of fire risk, such as agreement of a firefighting and emergency strategy, as is proposed in this case, would be for the appellant and the Scottish Fire and Rescue Service in the context of existing fire regulations and not for the Planning Authority to regulate through planning conditions. The Reporter did however conclude that where fire related matters impact on issues that are within the scope of planning considerations (such as access, layout, and the appearance of a development), then they can be indirectly relevant to a planning decision. Where fire safety measures potentially have implications for designated sites, this would also be material to planning considerations in instances where a proposal could impact on such a site. A more recent decision, where the Reporter dismissed an appeal against the City of Edinburgh Council's refusal of planning permission for a BESS at Kaimes (PPA-230-2609), was made directly in relation to these access and layout considerations. In this case, the Reporter deemed that the proposals were contrary to the NFCC guidance, in that adequate access arrangements were not provided by design for emergency vehicles and to allow for the emergency services to access a suitable water supply. As such, aspects

concerning the design of a development layout like access, drainage and water storage are material planning considerations, because they relate to the physical characteristics of the proposal.

7.55 In this regard, the intended firefighting strategy is a controlled burn, where the strategy is to allow an individual battery unit that catches fire to consume itself rather than applying water. In these circumstances, the updated NFCC Guidance recommends a total water supply on site of 180,000 litres, suitable to supply a flow rate of 25l/sec for up to two hours (a total of 180m^3 of water). The applicant proposes an onsite capacity, within a firefighting water tank, to the southeast of the BESS area, of 180m^3 capacity. Water run off during firefighting has the potential to hold contaminants, although the concentration of these would be expected to be low as no water will be applied directly to the battery units. The drainage design has been sized to ensure that the full volume of fire water run-off, can be contained on site within the impermeable attenuation basin, to the northwest, which has a storage capacity of some 1600m^3. The drainage system will include a mechanism to prevent discharge from the site into the surrounding environment in the form of an automatic penstock valve.

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

7.57 Notwithstanding the Reporter's comment in respect of the materiality of fire safety matters in the Kilmorack appeal, a firefighting and emergency strategy submitted and agreed prior to the delivery of battery equipment to the site, can be secured by condition. In this respect, the applicant has agreed to a condition including for a finalised design with a perimeter 'loop' vehicle access around the operational site boundary. As such, the proposal complies with NPF4 Policy 23 for Health and Safety.

7.58 It should also be noted that firefighting and emergency strategy will be a working document that will require updating from time to time in accordance with best practice and to take account of equipment and conditions on site. The regulation of fire safety, health, and other safety and environmental matters are not, however, matters for the Planning Authority to regulate. Consequently, the ongoing currency of these documents will be the responsibility of the operator in consultation with the relevant agencies including the Scottish Fire and Rescue Service.

7.59 The Scottish Fire and Rescue Service (SFRS) do not respond to individual planning applications instead relying on NFCC Guidance for Grid Scale BESS. At this present time, there is no further guidance available from SFRS on BESS site developments. In the absence of a national approach, no regional office comment can be provided, however, the guidance provided helps inform the Planning Authority's consideration of the application, as noted above. This proposal has been found to be in general accordance with the NFCC guidance. A condition is suggested to secure details of the final layout of the proposal, which will be required to reflect best practice in that regard.

Traffic and Transport

7.60 Access to the site would be to the southeast via a private road connecting to the Brae House Farm steading and thereafter, to the C1001 public road, connecting to the A836. The C1001 forms part of the Inverness to John O Groat's cycle route. The access junction onto the C1001 will be upgraded and widened to enable two HGV's to pass. Within the site a 4m single lane perimeter access track is proposed around the perimeter of the battery and substation compounds extending to the battery units and other infrastructure.

7.61 The Transport Statement (TS) submitted with the application states there will be a total of 2,429 HGV trips generated during the 18-month construction period. The TS states that it is anticipated that daily deliveries to the site would peak in the first year of construction during the establishment of the site, in month 5 of construction, at approximately 11 HGV deliveries per day.

7.62 Transport Planning highlighted some limitations within the TS assessment in their consultation response, however, following further review and discussions with the applicant and Case Officer, they would not object to the proposals overall, subject to standard conditions for a project of this scale. Transport Planning's concerns are most marked with respect to the C1001 route from which the site will be accessed, which is a designated on-road cycle route and in parts, is below the minimum width of 5.5 metres expected to accommodate two-way traffic.

7.63 Accordingly, A Construction Traffic Management Plan (CTMP), assessment of roads structures, an Abnormal Loads Management Plan and Section 96 Wear and Tear Agreement will be secured via condition. The CTMP will include a requirement for the applicant to assess and detail measures to mitigate the impact of construction traffic on the local road network in addition to a protocol for the regular monitoring of road conditions and the implementation of any remedial works required during the construction period. The proposed access point to the site, off the C1001, currently serving the Brae House, will also require to upgraded with enhanced visibility splays via condition.

7.64 The Abnormal Loads Assessment submitted with the application notes the route to site is assumed to be from Scrabster Port utilising the A9 before exiting onto the A836 and proceeding to site. Transport Scotland will require to be satisfied that any abnormal loads can negotiate the selected trunk road route and that their transportation will not have any detrimental effect on structures within the trunk road route path. An updated report, which assesses the full abnormal loads route from the port of entry to the development site is required by condition, as noted above.

Flood Risk and Drainage

7.65 Surface water runoff currently drains across the site from southeast to northwest into a small watercourse on the southern site boundary. The small watercourses adjacent to the Site boundary flow in a north-westerly direction, where they flow into the Dounreay Burn approximately 1 km north-west of the site. Filter drains will collect surface water runoff and convey flows to a proposed attenuation basin in the northwestern part of the site which, thereafter, will discharge into a field drain adjacent.

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

7.67 Highland Council's Flood Risk Management Team and SEPA have no objection to the application subject to a condition securing a fully detailed and finalised Drainage Impact Assessment (DIA) and finalised surface water drainage design.

Decommissioning and Reinstatement

7.68 The proposed development would have an operational life of 40 years, after which the site may be restored to its former use. While there is no suggestion to limit the lifetime of this development by condition, it is appropriate as well as required under NPF4 Policy 11 e) and HwLDP Policy 67 to condition an outline Decommissioning and Reinstatement Plan (DRP) prior to the commencement of development on site. The DRP would be prepared in consultation with and approved by the Planning Authority prior to the commencement of any works. Decommissioning works would then be undertaken in accordance with a statement of operations covering safety and environmental issues, including the safe removal of electrical equipment and foundations down to 1m below ground level, to ensure the site can be effectively returned to its former use. The DRP will also outline measures to safeguard and guarantee finances in the event the operator or owner is no longer solvent. The strategy and financial safeguard would also require to be reviewed at regular intervals.

Other Material Considerations

7.69 Given the scale and complexity of the development, and to assist in discharge of conditions, the Planning Authority usually seeks that the developer employs a Planning Monitoring Officer (PMO). The role of the PMO, amongst other things, would include the monitoring of, and enforcement of compliance with, all conditions, agreements and obligations related to this permission (or any superseding or related permissions) and shall include the provision of a bi-monthly compliance report to the Planning Authority.

7.70 A microwave radio link passes across the site from east to west. British Telcom's objection to the proposals based on potential interference in this respect, is considered resolvable, through further information provided by the applicant at the finalised design stage of the BESS site.

7.71 The associated grid connection for this scheme, along with other renewable energy developments, was previously considered by the Planning Authority and ECU, through the screening process, as not forming part of the overall 'project' in EIA terms. This previous position has been challenged by the decision on Raeshaw Wind Farms Ltd v Scottish Ministers [2026] CSIH 2010. In that case, the Court held that the Reporter erred in law by failing to undertake the necessary fact-specific evaluative exercise as to whether the wind farm and its required grid connection formed a single EIA "project", and by proceeding on the basis that it was sufficient that the grid connection did not

form part of the application and could be considered later through a separate consenting process. The Court also made clear that the question is not dependent on any intention to avoid EIA, but on whether, in substance, what is proposed should be treated as a single project for environmental assessment purposes. Relevant considerations include the non-exhaustive factors identified in R (Wingfield) v Canterbury City Council [2020] JPL 154, including functional interdependence and whether the deferred works are properly to be regarded as a stand-alone project, alongside consideration of the true nature and scope of the project and the degree of connection between its component part.

7.72 Whilst the applicant's Planning, Design and Access Statement does mention the required grid connection, it only briefly confirms that the developer has an accepted grid offer and that SSEN, as the transmission operator for the North of Scotland, will undertake the further design work, consenting and construction for the underground cable route. The actual grid connection infrastructure, including the cable route, joint bays and any further related works is therefore, not part of this application. Following discussions with the Council Officers, the applicant submitted further clarification on the nature of the grid connection during July 2026, in the form of a Grid Connection Review Statement. Through this, the applicant considers the relationship between the proposed BESS and its grid connection against the R (Wingfield) v Canterbury City Council [2020] JPL 154 criteria and concludes that the BESS and its grid connection are functionally interdependent and as such, cannot be considered as standalone projects. The applicant, however, further argues that none of the considerations of this judgement are determinative in their own right as to the extent of the EIA project. In this case, the applicant notes that the cable route is to be determined by the connection provider at a later date. Should the grid connection require a future planning application then it would need to be screened at a separate stage, at which point potentially cumulative effects would be considered. The purposes of the EIA Regulations would, therefore, not be defeated by treating the two projects discretely and as such, the applicant concludes that they consider that the two developments are separate from each other and should not be considered a single project for EIA purposes.

7.73 The Council Officers are agreed with the applicant's consideration of the proposed development and its required grid connection as functionally interdependent, in that the scheme could not operate for its intended purpose without connection to the grid. It is however, considered that the assessment of the project for EIA purposes, including the original screening opinion, cannot be determined solely by the way in which the current application has been framed so as to exclude the off-site grid connection infrastructure but requires consideration of the true nature and scope of the project in substance. In that regard, the fact that the grid connection infrastructure may come forward under a separate consenting process does not, in itself, resolve whether the wider scheme has been properly assessed for EIA purposes. It is further noted that the energy and operational benefits relied upon in support of the proposed application depend upon a grid connection being delivered. It is therefore considered by the Council Officers, that the grid connection is an essential component of the wider scheme, and that its omission from the application gives rise to a legitimate concern as to whether the full environmental effects of the project have been assessed.

7.74 As noted in the applicant's Grid Connection Review Statement, the connection will be accomplished using an underground cable (UGC). The most likely route runs from the onsite substation underneath the site access track to the C1001 public road to the south and thereafter, running underneath the adopted road to its junction with the A836 and then across the Dounreay Installation to the substation point of connection to the national grid network, covering an overall distance of some 5.7km. The applicant's statement assesses the additional environmental impacts arising from the proposals. Due to its location in the public road, the UGC works would not physically impact any of the designated cultural heritage assets in the area. The cable route is not located within any natural heritage designations, with the closest being the North Caithness Cliffs Special Protection Area (SPA), approximately 500m to the northeast of the route at its closest point, although it is separated by the existing Vulcan Naval Reactor Test Establishment in this area.

7.75 Considering the scale of the UGC connection works therefore, alongside the lack of natural heritage designations in the intervening areas along the route and the general separation of designated cultural heritage assets from the corridor, the Council Officers do not see merit in raising an objection based on the omission of the grid connection from the EIA assessment at this point. Scottish Ministers are the decision-maker, and it is ultimately a matter for them to determine, in light of Raeshaw, whether the proposed development and its required grid connection constitute a single project for EIA purposes and whether the original screening opinion request before them, is legally adequate.

8. MATTERS TO BE SECURED BY LEGAL AGREEMENT

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

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

9. CONCLUSION

9.1 The proposed development has the potential to play a role in addressing supply and demand peaks and troughs within the electricity transmission network by virtue of storing excess energy produced by generating stations, including from renewable sources. In that way, the proposal is considered to contribute to national climate change and carbon net-zero targets. It is a technology that has strong support within National Planning Framework 4 Policy 11 Energy.

9.2 However, as with all applications, a balancing exercise must be undertaken. The benefits of the proposal must be weighed against potential drawbacks and then considered in the round, taking account of the relevant policies of the Development Plan, which includes NPF4, as well as all other material planning considerations. Although industrial in appearance, the proposal would be relatively well screened from the public road, residential properties and other locations. As such, landscape and

visual impacts are well within acceptable limits. Moreover, the proposal will result in biodiversity net gain across the site.

9.3 In terms of impacts on residential amenity, roads, natural heritage, cultural heritage, flood risk, drainage and health and safety, the proposed development is acceptable, subject to the application of the recommended conditions to secure appropriate environmental mitigation. Statutory and other consultees responding to this application have not raised any fundamental objections and no public objections were received by either the Council or the Energy Consents Unit.

9.4 There are also clear impacts that might be expected from this proposed development, particularly during its construction. These can be managed through best practice construction management techniques to ensure surrounding interests, particularly road access and the amenity of local communities, is safeguarded from the key impacts of the development. Overall, the application siting is well considered for a development of this scale and nature, being in relatively close proximity to the agreed grid connection point at the new Dounreay Substation. The proposals will be in the context of other large scale electricity infrastructure, including the substation, associated high voltage transmission and distribution lines, remnants of the former Dounreay installation and onshore windfarms in proximity. The application site consists of non-prime agricultural land, with no particular habitat value, although the proposals offer the potential of enhancement and diversification in this respect. Potential amenity impacts in terms of operational noise may be mitigated via condition. Considering the potential further mitigation in the form of screening and planting, the proposals also offer the potential to integrate a substantial energy storage facility into the locale, without long term significant landscape and visual impacts.

9.5 Schedule 9 of the Electricity Act sets out what an applicant shall do in relation of the preservation of amenity. It is considered that the proposal has had regard to the desirability of preserving natural beauty and has mitigated the effects of the development in relation to the effects on the natural beauty of the countryside. This is by virtue of the location, setting and design, resulting in landscape and visual impacts which can be accommodated. Officers are also satisfied that environmental effects of this development can be addressed by way of mitigation, should permission be forthcoming by Scottish Ministers.

9.6 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. It is recommended that the Council Raises No Objection to the application.

10. IMPLICATIONS

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

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

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

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

10.5 Risk: Not applicable

10.6 Gaelic: Not applicable

11. RECOMMENDATION

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

11.1 It is recommended to **RAISE NO OBJECTION** to the application subject to

A. The Committee granting delegated authority to the Area Planning Manager – North/South to agree the finished condition wording, with any substantive amendments to be subject to prior consultation with the Chair of the North/South Planning Applications Committee;
B. The Committee granting delegated authority to the Area Planning Manager – North/South to agree any further environmental information or consultation, with any substantive amendments to be subject to prior consultation with the Chair of the North Planning Applications Committee; and
C. The following conditions and reasons:

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

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

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

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

2. **Commencement of Development**

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

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

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

3. **Serious Incident Reporting**

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

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

Conditions to be attached to any deemed planning permission

4. **Implementation in Accordance with Approved Plans**

(1) Except as otherwise required by the terms of the Section 36 consent and deemed planning permission, the Development shall be undertaken in accordance with the application:

a) including the approved drawings;

b) the supporting information and other documentation lodged in support of the application.

Reason: To ensure that the Development is carried out in accordance with the approved details.

5. **Site Investigation Works**

The site investigation works shall not commence until a detailed scheme of all site investigation works (including off-site and on-site works) has been submitted to and approved in writing by the Planning Authority. This shall include a timetable for all investigation works and enabling works and shall be submitted a minimum of 3 months in advance of the proposed date of commencement of any site investigation works.

Reason: To ensure the final details of the enabling works and site investigation works have regard for the rural setting of the Development Site and the potential impact of such works on the infrastructure of the area

6. **Site Investigation Works – Use of Materials**

Should the site investigation works result in the need for material to be used on site for other works or for material to be removed from the site, a detailed scheme of all excavated material works (including the volume of material to be used, the manner it is to be used and a justification for the need for the works) shall be submitted prior to the commencement of development and approved in writing by the Planning Authority in consultation with SEPA.

Reason: To ensure the final details of the enabling works and site investigation works have regard for the rural setting of the Development Site and the potential impact of such works on the infrastructure of the area.

7. **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:

- Up to 103 battery storage containers;
- Power conversion systems (PCS) units and transformers;
- Cabinets, auxiliary transformers, underground ducting and cabling
- Customer switchroom;
- TSO control room;
- Acoustic barriers;
- A substation compound, comprising two high-voltage grid transformers and low-level disconnectors;
- Earthworks and landscaping;
- Site access points, vehicle parking spaces and internal access tracks;
- Perimeter fencing;
- CCTV and lighting columns;
- Drainage infrastructure including SUDS attenuation basin, firefighting water supply and contaminated water storage; and
- Biodiversity mitigation / enhancement measures.

(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 8 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 Company shall immediately notify the Planning Authority in writing of that situation and shall, if the Planning Authority direct in writing, decommission the development and reinstate the site to the specification and satisfaction of the Planning Authority in accordance with an approved Decommissioning, Restoration, and Aftercare Plan, which shall be based on the principles of the Decommissioning, Restoration, and Aftercare Strategy approved under Condition 30 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.

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

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

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

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

c) Dimensioned plans (and swept path) showing access and turning within the site to enable safe access/egress in a forward gear.

d) Dimensioned plans showing the parking layout and a statement justifying the parking provision during construction.

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

(3) The submission shall explain and demonstrate how the proposed BESS layout satisfies the Department for Energy Security and Net Zero Guidance - Health and Safety in Grid Scale Electrical Energy Storage Systems, the National Fire Chiefs Council Guidance – Grid Scale Energy Storage System Planning - Guidance for Fire and Rescue Services and the Scottish Government Battery Energy Storage Systems: Planning Guidance and/or any or any superseding guidance prevailing at the time. For the avoidance of doubt, the full siting and design details of the development addressed under this condition, will demonstrate a perimeter loop internal road layout.

(4) 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.

(5) 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.

9. **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.

10. **Drainage**

No development shall commence until a finalised Drainage Impact Assessment and details of the final drainage design (including final ground levels and discharge rates information) have been submitted to, and approved in writing by, the Planning Authority, that demonstrate that runoff from a 1 in 200 year plus climate change event can be safely managed within the site boundary without increasing flood risk to others. The discharge route should be shown to be able to manage appropriate discharge in perpetuity. Thereafter, the development shall be constructed in accordance with the approved details, which shall be made available for use prior to the development's first occupation and maintained in perpetuity.

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

11. **External Lighting**

No development shall commence until full details of any external lighting to be used within the site and/or along its boundaries and/or access have been submitted to, and approved in writing by, the Planning Authority. Such details shall include full details of the location, type, angle of direction and wattage of each light which shall

be so positioned and angled to prevent any direct illumination, glare or light spillage outwith the site boundary. 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; to ensure any lighting associated with the development does not interfere with the safe operation of the rail network.

12. **Habitat Management Plan (HMP)**

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

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

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

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

(5) GIS Shapefiles must be supplied of the offsetting and enhancement areas to the Planning Authority prior to the commencement of works.

Reason: To ensure that the development secures positive effects for biodiversity in accordance with NPF4 and to allow the Planning Authority to map areas of compensation and enhancement.

13. **Nesting Bird Survey**

Construction works have the potential to disturb nesting birds or damage their nest sites. As such, a nesting bird survey should be made, not more than 24 hours prior to the commencement of development if this coincides within the main bird breeding season (March- August inclusive) and throughout the breeding bird season if new areas are being developed or there has been a break in construction. All wild bird nests are protected from damage, destruction, interference and obstruction under the Wildlife and Countryside Act 1981 (as amended). Some birds (listed on Schedule 1 of the Wildlife and Countryside Act) have heightened protection where it is also an offence to disturb these birds while they are in or around the nest.

Reason: to ensure all nesting birds are protected as per the legislation.

14. **Environmental Clerk of Works (EnvCoW)**

An Environmental Clerk of Works (EnvCoW) will incorporate the roles of an Ecological Clerk of Works (ECoW).

There shall be no Commencement of Development unless and until the terms of appointment of an independent Environmental Clerk of Works (EnvCoW) have been submitted to, and approved in writing by, the Planning Authority. This shall include a

EnvCoW schedule, detailing when the EnvCoW shall be present on site. For the avoidance of doubt, the EnvCoW shall be appointed as a minimum for the period from the commencement of development to the final commissioning of the development and their remit shall, in addition to any functions approved in writing by the Planning Authority, include (but not be limited to):

a) Impose a duty to monitor compliance with the environmental commitments provided in the EIA Report as well as the following (the EnvCoW works):
    i. the Nesting Bird Survey under Condition 13;
    ii. the Construction Environment Management and Pollution Protection Plan (CEMPPP) under Condition 15;
    iii. the Habitat Management Plan under Condition 12.
b) Providing training to the developer and contractors on their responsibilities to ensure that work is carried out in strict accordance with environmental protection requirements;
c) Require the EnvCoW to report to the nominated construction project manager any incidences of non-compliance with the EnvCoW works at the earliest practical opportunity;
d) Require the EnvCoW to report to the Planning Authority any incidences of non-compliance with the EnvCoW Works at the earliest practical opportunity
e) Maintains a Register of all inspections and audits, to include an inventory of all measures on the site, their effectiveness, as well as any advice provided;
f) Require the EnvCoW to report to the Planning Authority monthly, with a concise summary of the actions on site.
g) Require a statement that the EnvCoW shall be engaged by the Planning Authority but funded by the developer.

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

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

15. **Construction Environment Management and Pollution Protection Plan (CEMPPP)**

No development shall commence until a Construction Environment Management and Pollution Protection Plan (CEMPPP) 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 CEMPPP, subject to any variations approved in writing by the Planning Authority. The CEMPPP 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 temporary site illumination during the construction period;
g) Details of timing of works;
h) 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;
i) Details of routeing of onsite cabling;
j) Details of emergency procedures and pollution response plans;
k) Siting and details of wheel washing facilities;
l) 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;
m) 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 British Standard 5228 Part 1: 2009;
n) A Species Protection Plan;
o) Details of measures to reduce the risk of invasive non-native species being introduced/spread, such as via SUDs or contaminated vehicles from other sites;
p) Details of areas on the site designated for the storage, loading, off-loading, parking and manoeuvring of heavy duty plant, equipment and vehicles; and,
q) Details of how the best practicable measures will be implemented to reduce the impact of construction noise at noise sensitive locations.

Reason: To ensure that construction works are undertaken in accordance with applicable standards in the interests of environmental protection, amenity, and safety.

16. **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:

a) All earthworks and existing and finished ground levels in relation to an identified fixed datum point;

b) A plan showing existing landscaping features and vegetation to be retained;

c) The location and design, including materials, of any existing or proposed walls, fences and gates;

d) 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

e) 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 which 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.

A suitably qualified landscape consultant shall be employed to ensure that the approved Landscaping Plan is implemented to the agreed standard. Stages requiring supervision are to be agreed with the Planning Authority and certificates of compliance for each stage shall be submitted for approval.

Reason: In the interests of visual amenity and Biodiversity Net Gain.

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

No development shall commence on site until a Construction Traffic Management Plan (CTMP) has been submitted to, and approved in writing by, the Planning Authority in consultation with the Roads Authority and Transport Scotland. The CTMP shall be carried out as approved in accordance with the timetable specified within the approved CTMP. The CTMP shall include, but is not limited to:

a) A detailed construction programme;
b) Confirmation of bulk material sources to be used during the construction period;
c) Identification of the routes to and from site for construction traffic and confirmation of the number and type of vehicle movements anticipated on these routes during the construction period;
d) Details of an accurate and reliable method for recording the number of HGVs accessing the site throughout the construction period will be required. The developer must submit monthly updates in an evidencable and appropriate format. It is recommended that a permanent vehicle counter at the access be installed and maintained for the duration of the works;
e) An assessment of the suitability of the public road to accommodate the cumulative volume and type of traffic movements proposed. This includes an assessment of the structural capacity of the road infrastructure;
f) A plan detailing the extent of any proposed improvements to the local road network on the route between the port of entry and the site accesses within that stage. The plan shall be based on an assessment of the route and the likely level of traffic using the route for the construction of the development. Thereafter, the improvement works shall be implemented prior to the main construction works commencing;
g) A schedule of mitigation detailing proposed measures to mitigate the impact of construction traffic on the local road network following detailed assessment of the relevant routes. Measures such as the following should be considered, with such works to be funded / delivered by the applicant in a timely manner:

i. carriageway strengthening;
ii. strengthening of bridges and culverts;
iii. carriageway widening and/or edge strengthening;
iv. provision of passing places;
v. road safety measures; and
vi. traffic management, including measures such as temporary speed limits, suitable temporary signage, road markings and the use of speed activated signs as required.

h) A procedure for the regular monitoring of road conditions and the implementation of any remedial works required during the construction period in respect of damage that can reasonably be attributed to constructed related traffic associated with the proposed development;
i) A concluded agreement in accordance with Section 96 of the Roads (Scotland) Act 1984 under which the developer is responsible for the repair of any damage to the public road network that can reasonably be attributed to construction related traffic related to the development. As part of this agreement, pre-start and post-construction road condition surveys must be carried out by the developer, to the satisfaction of the Roads Authorities;
j) Details of upgrading works required at access points connecting to any Council maintained roads;
k) Measures to ensure that all affected public roads are kept free of mud and debris arising from the development;
l) Appointment of a Traffic Management Coordinator to manage all construction traffic, and the implementation of the CTMP. Prior to commencement of construction, a Scope of Work for the role of Traffic Management Coordinator shall be submitted to include:
    i. Details of how the Traffic Management Coordinator will manage construction traffic and manage and monitor compliance with the CTMP.
    ii. Details of how the Traffic Management Coordinator intends to liaise with other major developments in the area.
m) The establishment of a Community Liaison Group (CLG) the purpose of which shall be to monitor progress and agree suitable measures to address any issues of concern arising from the works;
n) Details on the steps that will be taken to manage potential interactions with construction traffic arising from other major developments' activities in the local area, to the extent using the same access routes as the proposed development. Where information is reasonably available regarding the predicted construction traffic movements of such other major developments, and where the construction stages and access routes of these developments are likely to overlap with that of the Development, an evaluation of the cumulative construction traffic movements will be undertaken. The findings will be used to inform the need for any further mitigation to be detailed in the CTMP;
o) A risk assessment for transportation during daylight hours and hours of darkness;

p) Details of the measures that will be taken to manage points of conflict between construction traffic routes where they interact with local public roads and users of them. This will include the submission of a Code of Practice to be implemented by drivers of construction and delivery vehicles;
q) A timetable for the implementation of the measures detailed in the CTMP; and
r) A procedure for the applicant notifying and obtaining approval from the Roads Authority for any significant transport activities during the operational phase.

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

Reason: In the interests of road safety and to ensure adequate road safety measures are in place including measures to minimise conflict with routes to schools, cyclists and local events and to mitigate the adverse impact of construction traffic on the safe and efficient operation of the trunk road network.

18. **Abnormal Loads**

No delivery of any Abnormal Indivisible Load (AIL) shall be made at any stage of construction or operation of the development until an Abnormal Indivisible Load Assessment and Construction Traffic Management Plan (AIL-CTMP) has been submitted to, and approved in writing by, the Planning Authority, in consultation with the Local Roads Authority, Transport Scotland, the Police and all affected Community Councils. The details shall include, but is not limited to:

a) A high-level review of the access route from Port of Entry is submitted which includes an initial route assessment report for abnormal loads including swept path analysis and details of the movement of any street furniture, any traffic management measures and any upgrades and mitigations measures as necessary;
b) A review of maximum axle loading on structures along the access route;
c) A review of overhead services along the access route;
d) A review of new or diverted underground services that may be at risk from construction traffic
e) A review in summer conditions of roadside vegetation along the access route and clearance of any vegetation that may interfere with construction traffic;
f) A review of road works or road closures that could affect the movement of construction traffic;
g) Full details of all road improvements and mitigation measures necessary to facilitate abnormal load movements shall be agreed with Transport Scotland and the Local Roads Authority and thereafter implemented in full to the satisfaction of Transport Scotland and the Local Roads Authority. Such measures may, but not be limited to, include as necessary: the removal of street furniture, modifications to bridges and culverts, junction and carriageway widening and/or edge strengthening, road safety improvements and traffic management. These measures shall be undertaken by a recognised Quality Assured traffic management consultant;

h) A detailed protocol for the delivery of abnormal loads. The protocol shall identify any requirement for convoy working/and or escorting of vehicles and include arrangement to provide advance notice of demountable signs or similar approved, when required to alert road users and local residents of expected abnormal load movements. All such movements on Council maintained roads shall, unless otherwise required by Police Scotland, take place outwith peak times on the network including school travel times and shall avoid community events;

i) A detailed assessment of structures along the routes of any Highland Council Road to be used for abnormal load deliveries shall be carried out in consultation with and the satisfaction of the Council's Structures Section;

j) A risk assessment for the transportation of abnormal loads to site during daylight hours and hours of darkness;

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

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

m) The establishment of a Community Liaison Group (CLG) the purpose of which shall be to monitor progress and agree suitable measures to address any issues of concern arising from the works;

The AIL-CTMP shall be prepared in consultation with all interested parties and thereafter be carried out as approved. At the end of the construction period, appropriate reinstatement works shall be carried out as required by and to the satisfaction of the Council.

Reason: To minimise interference and maintain the safety and free flow of traffic on the road network as a result of the traffic moving to and from the development.

19. **Access Design**

No development shall commence on site until a detailed design for the site access from the C1001 has been submitted to and approved in writing by the Planning Authority in consultation with the Roads Authority. The detailed design must include

- Visibility splays of X to be 4.5m and Y to be 215m in both directions, with no walls, fences or vegetation in any part of the splay.

The design of the access must also specify the geometry, width, surfacing, location of gates and drainage measures which shall be in accordance with Council guidelines and standards. Once approved, the access must be upgraded before any works commence on site.

Reason: To minimise interference and maintain the safety and free flow of traffic on the road network as a result of the traffic moving to and from the development.

20. **Assessment of Roads Structures**

No development shall commence on site until a schedule of structures including bridges, culverts, retaining walls, and embankments on the local road network which form part of the HGV construction traffic routes and the abnormal load traffic routes has been undertaken in consultation with and to the satisfaction of the Council's Structures Department. This shall include a load assessment of the structures, which shall include an assessment of any HGV and AIL movements, which will be transported (inclusive of construction vehicles, plant, machinery and BESS units) which may be used in the construction of the development.

Thereafter, a scheme of mitigation to safeguard the safety and the condition of the structures during the period of construction traffic shall be submitted to, and approved in writing by, the Planning Authority in consultation with the Roads Authority.

The scheme of mitigation shall be informed by the load assessment and it shall include a pre-start inspection; arrangements for undertaking regular inspection of the structures; arrangements for reporting any deterioration and for carrying out maintenance due to the extraordinary level of traffic; consideration of Traffic Management measures for Heavy Goods Vehicles during construction of the development; and details of any necessary works to bridges and the road over bridges and the immediate approach to any bridges in order to facilitate the safe passage of the proposed construction traffic. Before any works commence on site the applicant will require approval by the Council of any mitigation or replacement designs for structures deemed unsuitable and all necessary structural works must be implemented.

Reason: In the interests of road safety.

21. **Noise Impact Assessment**

Prior to first operation, a revised Noise Impact Assessment (NIA) shall be submitted to the LPA for approval. The NIA report shall include details of the specified plant to be installed and any required noise control measures to ensure that operational noise levels from the Development will be below the noise level limits detailed in Condition 22.

The development shall thereafter be undertaken in accordance with the agreed details.

Reason: In the interest of safeguarding community and residential amenity.

22. **Operational Noise**

The Noise Rating Level (as defined in BS 4142:2014+A1:2019) from the operation of the development shall not exceed 25dB (A)* as measured or calculated at the nearest occupied residential Noise Sensitive Receptors (as existing or consented at the time of this consent).

(*)Determined by applying the following criteria - Where background levels are below 30dB LA90, the limit to be applied shall be 30dB or no more than 5dB above background whichever is lower.

Reason: In the interest of safeguarding community and residential amenity.

23. **Construction Noise and Vibration Management Plan**

Prior to the commencement of any construction works, a Construction Noise and Vibration Management Plan (CNVMP) shall be submitted to and approved in writing by the Planning Authority. The CNVMP shall be prepared in accordance with BS5228-1:2009+A1:2014 and shall include:

- Details of the mitigation measures to be implemented to minimise noise and vibration from construction activities, including those recommended in the SEI;
- Proposals for monitoring noise and vibration throughout the construction period; and
- Details of the community liaison for engaging with affected residents, including communication of potential impacts and complaint procedures.

Thereafter, the development shall proceed in accordance with the approved CNVMP, and all mitigation measures shall be in place prior to the commencement of construction, unless otherwise agreed in writing by the Planning Authority

Reason: In the interest of safeguarding community and residential amenity.

24. **Hours of Construction**

Unless otherwise authorised in writing by the Planning Authority, construction activities associated with this development (including deliveries, the loading and unloading of delivery vehicles, plant, or other equipment) for which noise is audible at the curtilage of any noise sensitive property, shall not take place outside the following hours:

- Monday to Friday: 08:00 – 19:00 hrs
- Saturday: 08:00 – 19:00 hrs
- At no time on Sunday

Reason: In the interest of safeguarding community and residential amenity.

25. **Dust Mitigation**

Prior to the commencement of development, the applicant shall submit, for the written approval of the Planning Authority, a scheme for the mitigation of construction dust which demonstrates how the applicant/contractor will ensure the best practicable measures are implemented in order to reduce the impact of construction dust.

The development shall progress in accordance with the approved Construction Dust Mitigation Scheme and all approved mitigation measures shall be in place prior to construction commencing or as otherwise may be agreed in writing by the Planning Authority.

Reason: In the interest of safeguarding community and residential amenity.

26. **Battery Safety Management Plan**

No development shall commence until a full, finalised Battery Safety Management Plan has been submitted to and approved in writing by the Planning Authority. Thereafter the construction of the development shall only be carried out in strict accordance with the approved Plan’s specifications.

Reason: In the interests of safety and environmental protection.

27. **Local Employment Scheme**

Prior to the commencement of envelopment, a Local Employment Scheme for the construction of the development shall be submitted to and agreed in writing by the Planning Authority. The submitted Scheme shall make reference to the supporting Planning Design and Access Statement (dated July 2025).

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.

28. **Archaeology**

No works in connection with the development hereby approved shall commence unless an archaeological Written Scheme of Investigation (WSI) has been submitted to and approved in writing by the Planning Authority and a programme of archaeological works has been carried out in accordance with the approved WSI. The WSI shall include details of how the recording and recovery of archaeological resources found within the application site shall be undertaken, and how any updates, if required, to the written scheme of investigation will be provided throughout the implementation of the programme of archaeological works. Should the archaeological works reveal the need for post excavation analysis the development hereby approved shall not be occupied or brought into use unless a Post-Excavation Research Design (PERD) for the analysis, publication and dissemination of results and archive deposition has been submitted to and approved in writing by the Planning

Authority. The PERD shall be carried out in complete accordance with the approved details.

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

29. **Planning Monitoring Officer**

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

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

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

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

30. **Decommissioning, Restoration, and Aftercare**

(1) No development shall commence unless and until a Decommissioning, Restoration, and Aftercare Strategy has been submitted to, and approved in writing by the Planning Authority in consultation with the Roads Authority and Transport Scotland. 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.

(2) The Decommissioning, Restoration and Aftercare Strategy shall thereafter be complied with in full in accordance with the timeline approved therein.

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.

31. **Financial Guarantee**

No development shall commence until:

(1) Full details of a guarantee, bond or other financial provision to be put in place to cover all of the decommissioning and site restoration measures outlined in the Decommissioning and Restoration Plan approved under Condition 30 of this permission have been submitted to, and approved in writing by, the Planning Authority. For the avoidance of doubt the bond must be able to be called upon by The Highland Council and be enforceable against the operator and landowner and/or leaseholder; and

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

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

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

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

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

(5) Each review shall be:

a) conducted by a suitably qualified independent professional; and

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

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

(6) 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 information, 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.

Signature:	Bob Robertson
Designation:	pp Area Planning Manager – North
Author:	Michael Kordas – Principal Planner
Background Papers:	Documents referred to in report and in case file.
Relevant Plans:	Plan 1 - Location Plan Figure 1
	Plan 2 - Site Layout Plan Figure 2
	Plan 3 - 132kV Substation Elevation 1079-P03
	Plan 4 - BESS Container Elevation 1079-P05
	Plan 5 - BESS Transformer Elevation 1079-P06
	Plan 6 - Customer Switchroom 1079-P08
	Plan 7 - TSO Control Room 1079-P09
	Plan 8 - Access Tracks and CCTV Detail 1079-P10
	Plan 9 – Site Fencing and Gates 1079-P07
	Plan 10 – Water Storage Tank Elevation 1079-P04
	Plan 11 – Outline Drainage Strategy Appendix 1

Appendices: Appendix 1 – Letters of Representation

Appendix 2 - Development Plan and Other Material Policy Considerations

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

Appendix 1 – Letters of Representation Received

No representations received by the Highland Council.

Appendix 2 – Development Plan and Other Material Policy Considerations

DEVELOPMENT PLAN

National Planning Framework 4 (NPF4) (2023)

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

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

Highland Wide Local Development Plan (HWLDP) 2012

A2.2 28 - Sustainable Design
29 - Design Quality and Place-making
30 - Physical Constraints
31 - Developer Contributions
36 – Development in the Wider Countryside
51 - Trees and Development
52 - Principle of Development in Woodland
53 – Minerals
54 – Mineral Wastes

55 - Peat and Soils

56 - Travel

57 - Natural, Built and Cultural Heritage

58 - Protected Species

59 - Other Important Species

60 - Other Important Habitats and Article 10 Features

61 - Landscape

62 - Geodiversity

63 - Water Environment

64 - Flood Risk

65 – Waste Water Treatment

66 - Surface Water Drainage

67 - Renewable Energy Developments

69 - Electricity Transmission Infrastructure

72 - Pollution

73 - Air Quality

74 - Green Networks

77 - Public Access

78 - Long Distance Routes

Caithness and Sutherland Local Development Plan (CaSPlan)

A2.3 There are no site-specific policies covering the application site therefore the application requires to be assessed against the general policies of the Development Plan (NPF4 and HwLDP) referred to above. It is noted, however, that the CaSPlan does identify Special Landscape Areas (SLA) within the plan area.

Other Highland Council Supplementary Guidance

A2.4

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

- Special Landscape Area Citations (June 2011)
- Standards for Archaeological Work (Mar 2012)
- Sustainable Design Guide (Jan 2013)

Emerging Highland Council Development Plan Documents and Planning Guidance

A2.5 The Council has recently commenced the preparation of a new-style Highland Local Development Plan (HLDP), with the programme including an Evidence Report in 2026/2027 and subsequent Gate Check, with Proposed Plan stage in 2027/2028. Once adopted this new style HLDP will supersede and replace HwLDP and the Council 'area' LDP.

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

Local Place Plan

A2.7 The application site area is not currently covered by a validated or notified Local Place Plan (LPP).

Other National Guidance

A2.8
- Scottish Government Planning Guidance: Battery Energy Storage Systems (March 2026)
- Climate Change (Emissions Reduction Targets) (Scotland) Act 2019 – interim and annual targets replaced by Climate Change (Emissions Reduction Targets) (Scotland) Bill in November 2024
- Climate Change Committee Report to UK Parliament (July 2024)
- UK Government Clean Power Action Plan (Dec 2024)
- Draft Energy Strategy and Just Transition Plan (2023)
- Draft Scottish Biodiversity strategy to 2045: tackling the nature emergency (2023)
- Scottish Energy Strategy (2017)
- Energy Efficient Scotland Route Map, Scottish Government (2018)
- Historic Environment Policy for Scotland, HES (2019)
- PAN 1/2011 - Planning and Noise (2011)
- PAN 60 – Planning for Natural Heritage (2008)
- Circular 1/2017: Environmental Impact Assessment Regulations (2017)
- PAN 68 – Design Statements (Aug 2003)
- Health and Safety Guidance for Grid Scale Electrical Energy Storage Systems' (UK Government, Mar 2024)

- National Fire Chiefs Council's guidance - Guidance on Grid Scale Battery Energy Storage System planning (Nov 2022) ('the NFCC guidance') and a related draft revision (Jul 2024) approved for publication (Dec 2025).

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

National Policy

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

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

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

A3.3 At the national level, NPF4 considers that strategic renewable electricity generation and transmission infrastructure will assist in the delivery of the Spatial Strategy and Spatial Priorities for the north of Scotland, and that Highland can continue to make a strong contribution toward meeting Scotland's ambition for net zero. Alongside these ambitions, the strategy for Highland aims to protect environmental assets as well as to stimulate investment in natural and engineered solutions to address climate change. This aim is not new and will clearly require a balancing exercise to be undertaken, which is reflected throughout NPF4.

A3.4 **Part 2 – Policies: NPF4 Policies 1, 2, and 3** now apply to all development proposals Scotland-wide, which means that significant weight must be given to the global climate and nature crises when considering all development proposals, as required by NPF4

Policy 1. To that end, development proposals must be sited and designed to minimise lifecycle greenhouse gas emissions as far as is practicably possible in accordance with NPF4 Policy 2, while contributing to the enhancement of biodiversity, as required by NPF4 Policy 3.

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

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

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

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

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

Development proposals linked to community ownership and management of land will be supported. Following consultation, the Highland Council's Community Wealth

Building Strategy 2024-2027 was agreed by the Council on 19 September 2024. The strategy provides a framework that sets out how the Council will utilise different activities to maximise the impact of investment in local areas and support more local ownership of assets and wealth. The finalised version of the strategy will be uploaded to the Council's website in due course.

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

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

A3.11 Policy 5 Soils aims to protect carbon-rich soils, restore peatlands and minimise disturbance to soils from development.

A3.12 Policy 6 aims to protect and expand forests, woodland and trees with significant protection offered to Ancient Woodland with a presumption against woodland removal without appropriate compensatory planting.

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

A3.14 It states that development proposals should only be supported where they maximise net economic impact, including local and community socio-economic benefits such as employment, associated business and supply chain opportunities. The policy goes on to say that significant weight will be placed on the contribution of the proposal to renewable energy generation targets and on greenhouse gas emissions reduction targets, while identifying impacts, including cumulative impacts, that must be suitably addressed and mitigated against. Policy 11 e) i to xiii sets out the criteria against which applications must be assessed.

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

and visual impacts even if the contribution to national renewable energy targets is considerable.

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

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

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

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

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

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

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

- Natural, built and cultural heritage features;
- Visual impact and impact on the landscape character of the surrounding area (the design and location of the proposal should reflect the scale and character of the landscape and seek to minimise landscape and visual impact, subject to any other considerations);
- Amenity at sensitive locations, including residential properties, work places and recognised visitor sites (in or outwith a settlement boundary); and
- The amenity of users of any Core Path or other established public access for walking, cycling or horse riding;

Highland-wide Local Development Plan (HwLDP)

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

A3.23 HwLDP Policy 57 – Natural, Built and Cultural Heritage requires all development proposals be assessed taking into account the level of importance and type of heritage features, the form and scale of the development, and any impact on the feature and its setting.

A3.24 HwLDP Policy 67 - Renewable Energy sets out that "renewable energy development should be well related to the source of the primary renewable resource needed for operation". It states that "The Council will consider the contribution of the proposed development in meeting renewable energy targets and positive/negative effects on the local and national economy as well as all other relevant policies of the Development Plan and other relevant guidance". The Council will support proposals where it is satisfied, they are located, sited and designed such as they will not be significantly detrimental overall, individually or cumulatively with other developments against eleven specified criteria (as listed in HwLDP Policy 67). Such an approach is consistent with the concept of Sustainable Design (HwLDP Policy 28) and the concept of supporting the right development in the right place at the right time.

A3.25 Policy 69 – Electricity Transmission Infrastructure states that proposals for overground, underground or sub-sea electricity transmission infrastructure (including lines and cables, pylons/ poles and vaults, transformers, switches and other plant) will be considered having regard to their level of strategic significance in transmitting electricity from areas of generation to areas of consumption". Subject to balancing with this consideration, and taking into account any proposed mitigation measures, the Council will support proposals which are assessed as not having an unacceptable significant impact on the environment, including natural, built and cultural heritage

features.

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

Area Local Development Plan: Caithness and Sutherland Local Development Plan (CaSPlan)

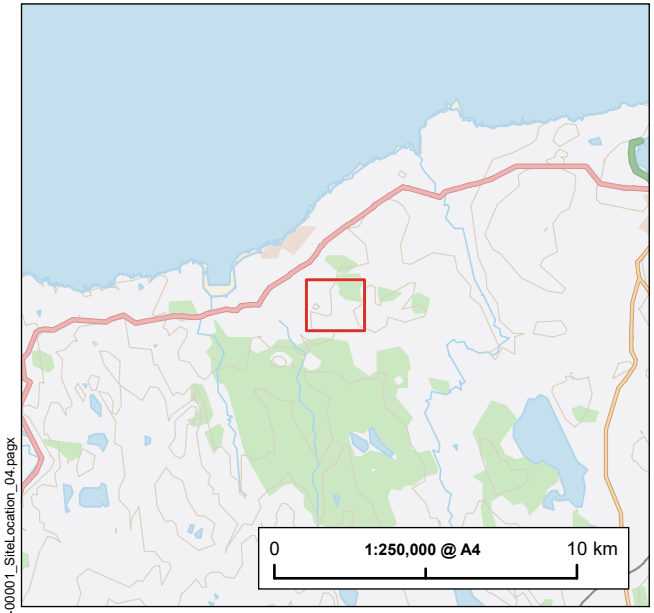
A3.28 No specific policies apply however, that the CaSPlan does identify Special Landscape Areas (SLA) within the plan.

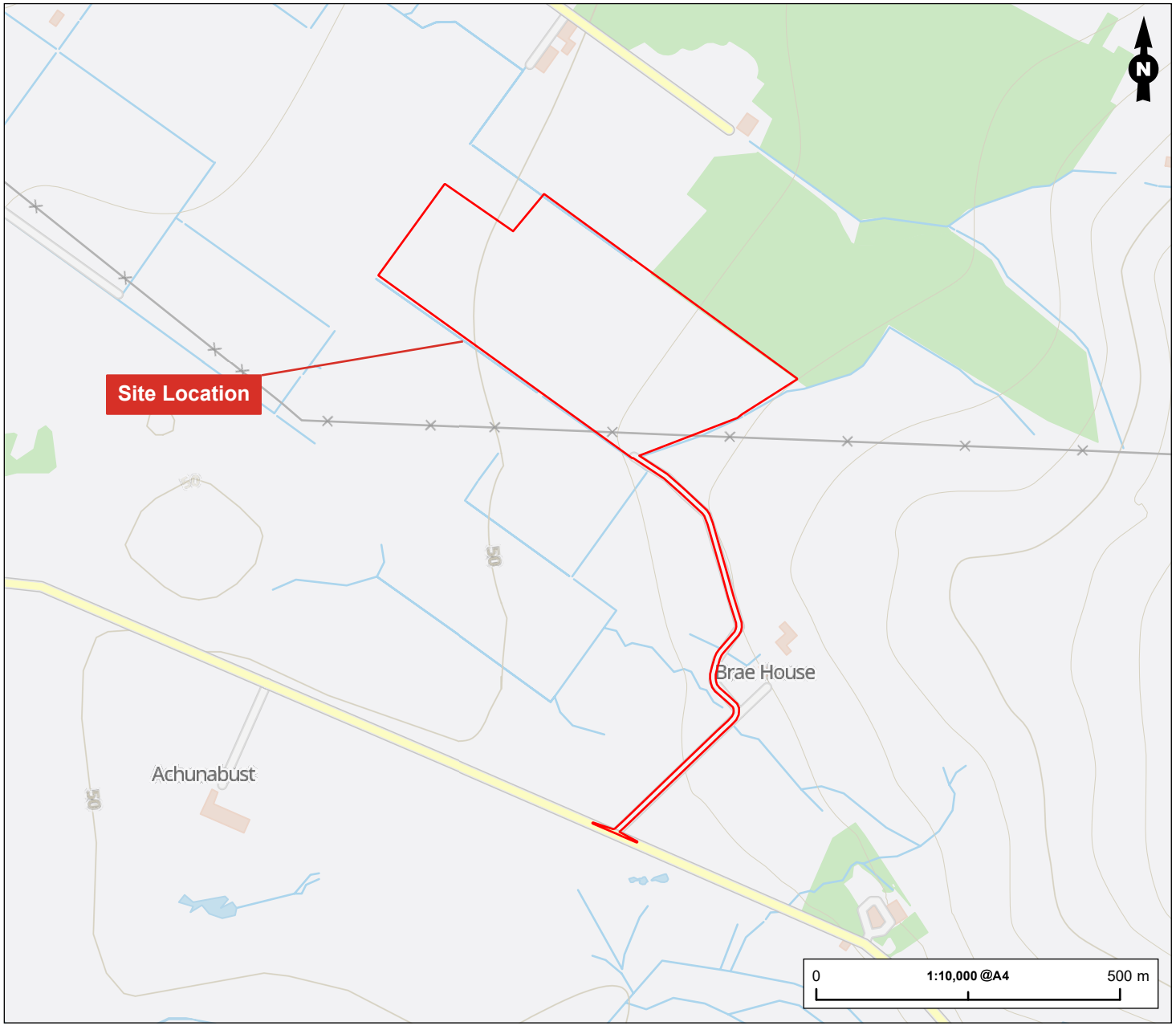
Draft Energy Strategy and Just Transition Plan (2023)

A3.29 Overall, the draft Energy Strategy forms part of the new policy approach alongside NPF4 and confirms the Scottish Government's policy objectives and related targets reaffirming the crucial role that BESS and enabling transmission infrastructure will play in response to the climate crisis which is at the heart of all these policies.

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

A3.30 The planning guidance has been prepared on behalf of Scottish Government with input from industry, planning authorities, NatureScot, Scottish Environment Protection Agency (SEPA) and the Scottish Fire and Rescue Service (SFRS). The core purpose of the guidance is to assist applicants, decisionmakers, and other participants in the planning system to effectively plan for BESS across Scotland. The guidance supports a clearer understanding of the specific technical, environmental, and wider issues associated with planning for BESS, and how these may be positively addressed through the planning process, to ensure that development is appropriately sited, well designed, and responsive to its context.





Green Switch CAPITAL

Figure Title: Site Location	Project Name: Titan Energy Storage Facility	Date: August 2025	
		Prepared By: RD/MFT	Figure No.: 1
Client: **Green Switch Capital Ltd.**	Project No./Filery ID: 1620017310 / REH2024N03971	Scale: As Shown	Revision: 1.0

1620017310-RAM-MA-IA-00001_SiteLocation_04.pagx

Coordinate System: British National Grid. Projection: Transverse Mercator. Datum: OSGB 1936.

Legend

- Site Boundary

Site Infrastructure

- BESS
- Car Park
- Client Control Room
- TSO Control Room
- Substation
- Indicative attenuation basin (2600-3000m² approx.); with native wetland edge species and oxygenators
- Mixed native plant screening
- Naturally formed bund (2-3m high); with native scrub and tree planting
- Neutral species rich grassland; with scattered tree groups and scrub (field rose, gorse, etc.)
- Overhead electric lines
- Access track
- Perimeter fence
- Fire water storage (10m x 10m)
- 35 m buffer from overhead electric lines
- Acoustic Fence

Figure Title
Site Layout

Project Name
Titan Energy Storage Facility

Project No./Filery ID
1620017310/ REH2024N03971

Date	Figure No.	Revision
August 2025	2	1.0

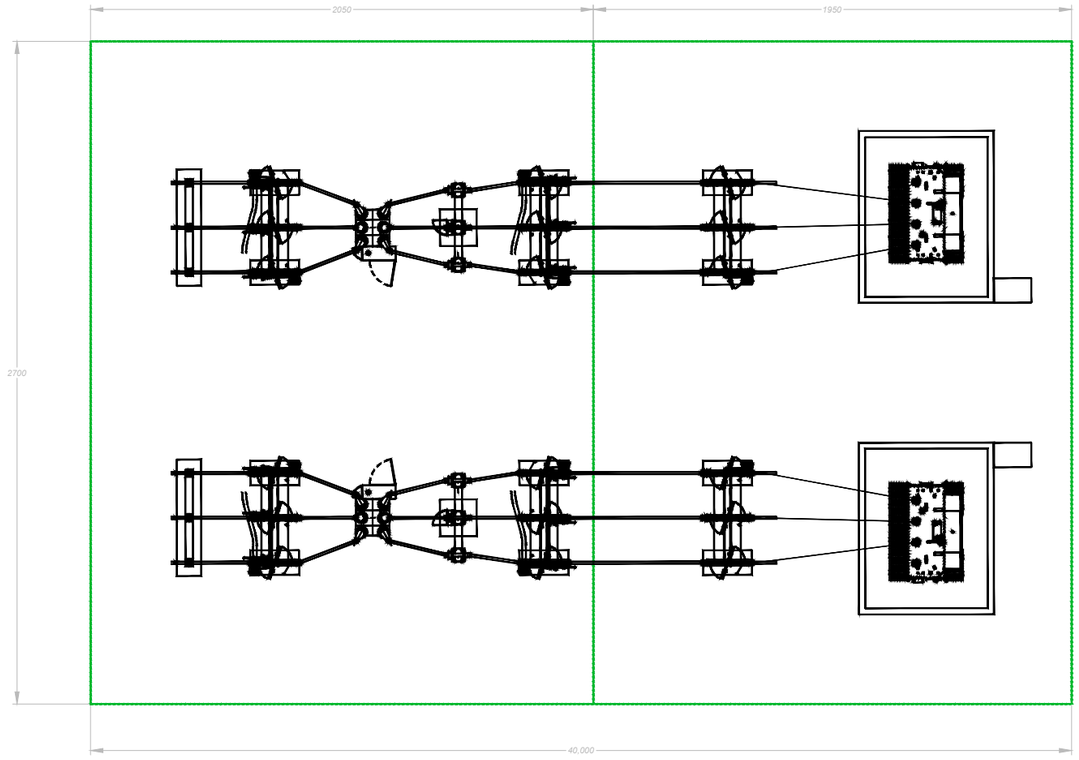
Prepared By	Scale
RD/MFT	1:2,250 @A3

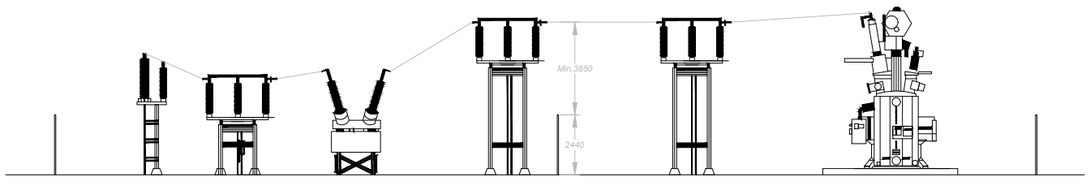
Client
Green Switch Capital Ltd.

RAMBOLL

1620017310-RAM-MA-IA-00004_SiteLayout_05.pagx

Coordinate System: British National Grid. Projection: Transverse Mercator. Datum: OSGB 1936.





1:75

1.5m 0 1.5m 3m 4.5m 6m 7.5m

NOTES

FOR INFORMATION

REVISION	DETAILS	DATE	DRAWN	APP'D

PROJECT

TITAN ENERGY
STORAGE FACILITY

DRAWING TITLE

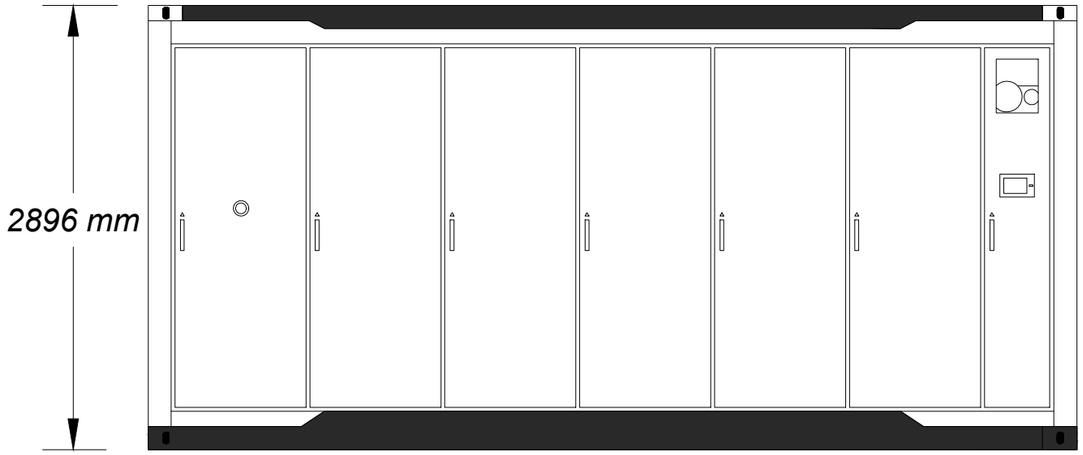
132 kV SUBSTATION
ELEVATION

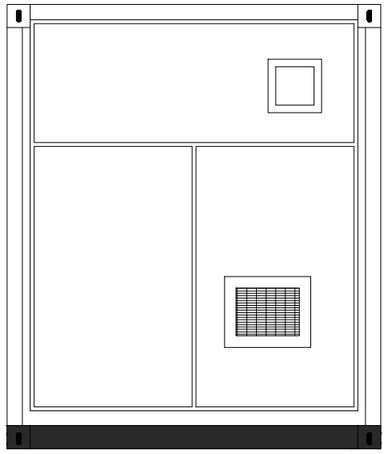
DRG No. 1079-P03	*REV* iSSUE
SCALE 1:25	*DATE* 13/03/2025
DRAWN BY TO	*APPROVED* DH

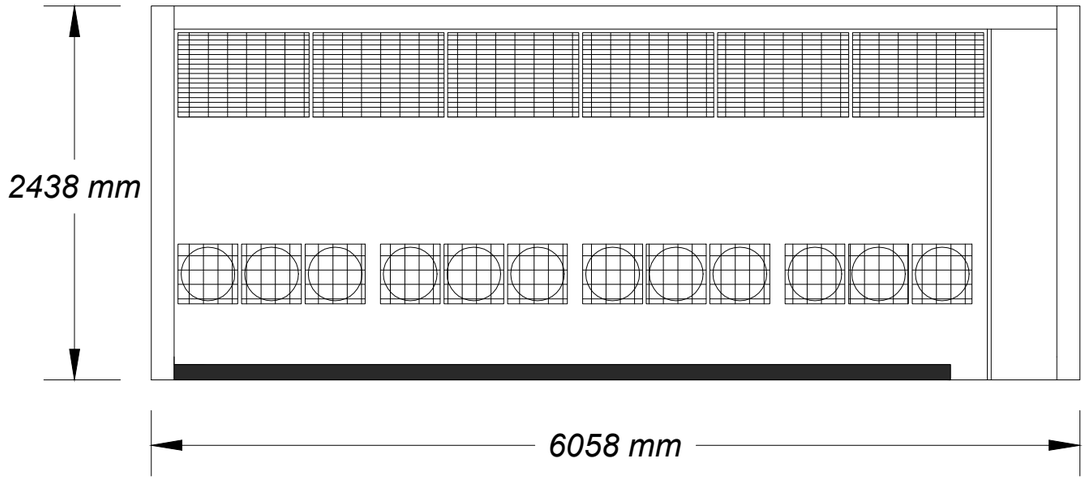
Green Switch CAPITAL

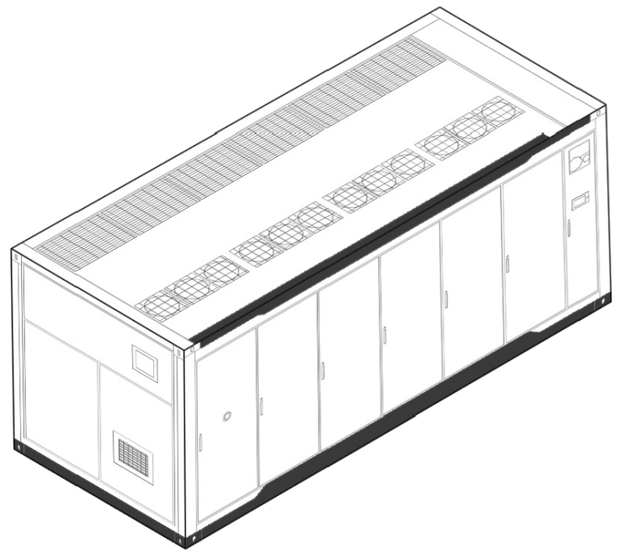
GREENSWITCH CAPITAL LTD.
FLOOR 5, EXCHANGE STATION
TITHEBARN ST.
LIVERPOOL
L2 2QP

www.gscapital.uk | info@gscapital.uk









NOTES

FOR INFORMATION

REVISION	DETAILS	DATE	DRAWN	APP'D

PROJECT

TITAN ENERY
STORAGE FACILITY

DRAWING TITLE

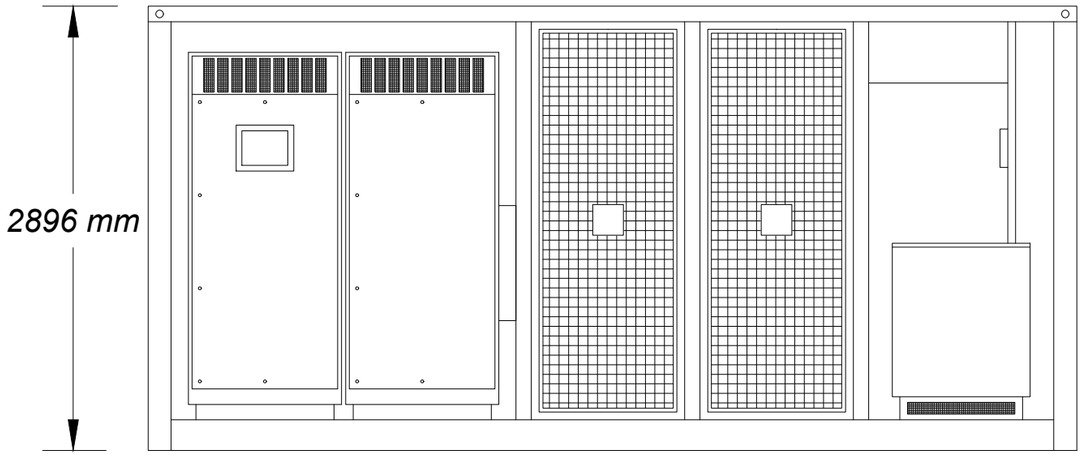
BESS CONTAINER
ELEVATION

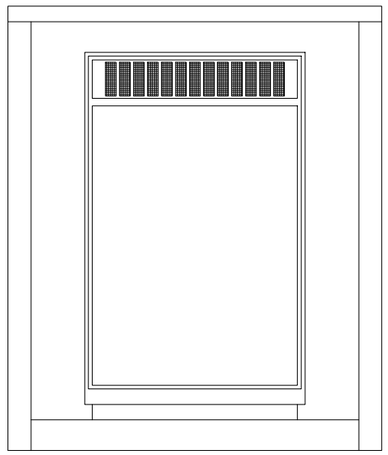
DRG No. 1079-P05	*REV* ISUE
SCALE	*DATE* 13/03/2025
DRAWN BY TO	*APPROVED* DH

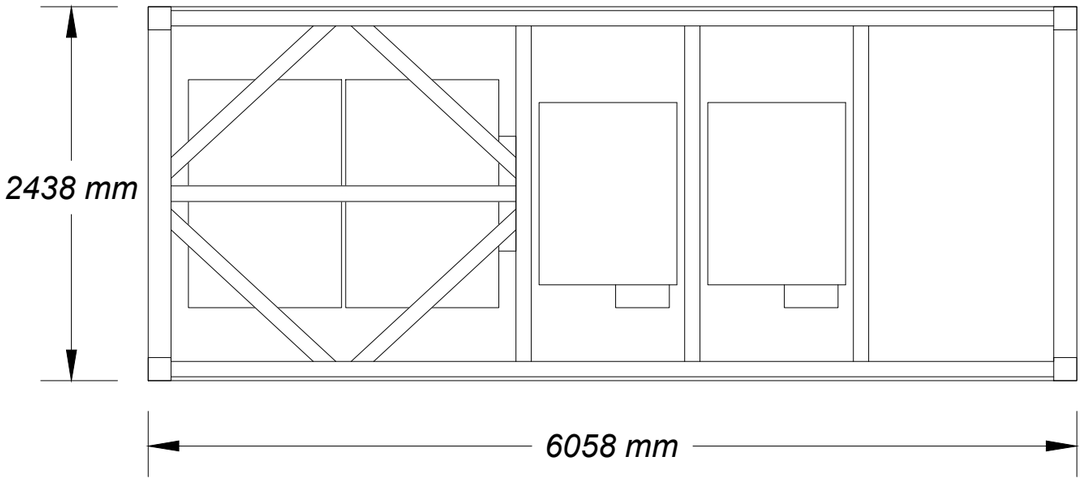
Green Switch CAPITAL

GREENSWITCH CAPITAL LTD.
FLOOR 5, EXCHANGE STATION
TITHEBARN ST.
LIVERPOOL
L2 2QP

www.gscapital.uk | info@gscapital.uk







NOTES

FOR INFORMATION

REVISION	DETAILS	DATE	DRAWN	APP'D

PROJECT

TITAN ENERGY
STORAGE FACILITIES

DRAWING TITLE

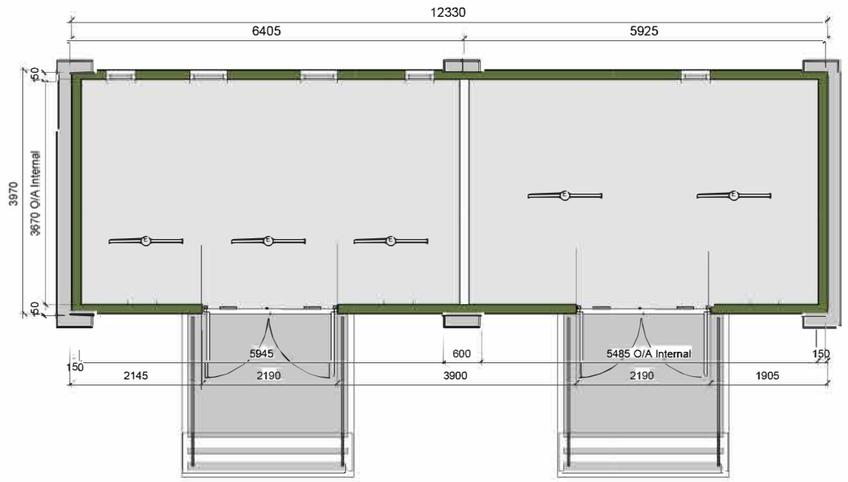
BESS TRANSFORMER
ELEVATION

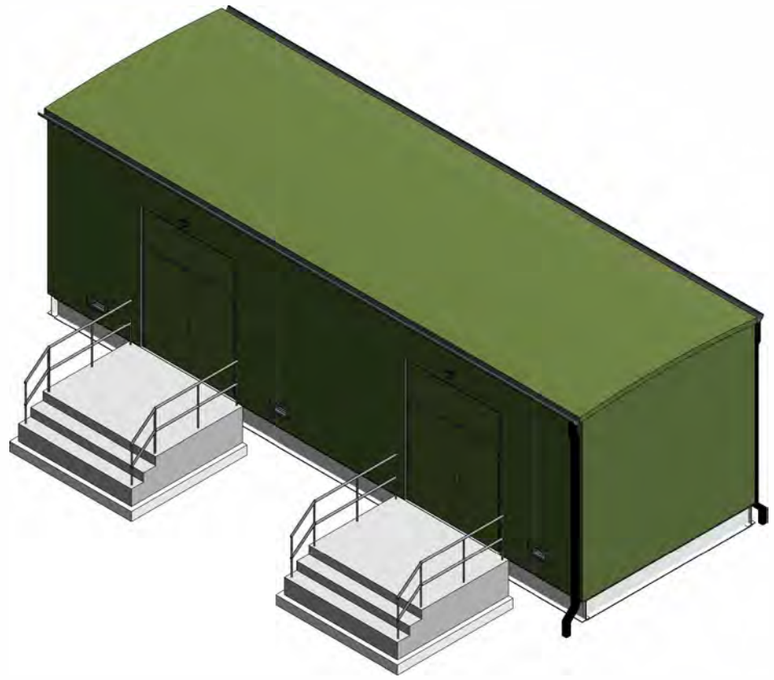
DRG No. 1079-P06	*REV* Issue
SCALE	*DATE* 13/03/2025
DRAWN BY TO	*APPROVED* DH

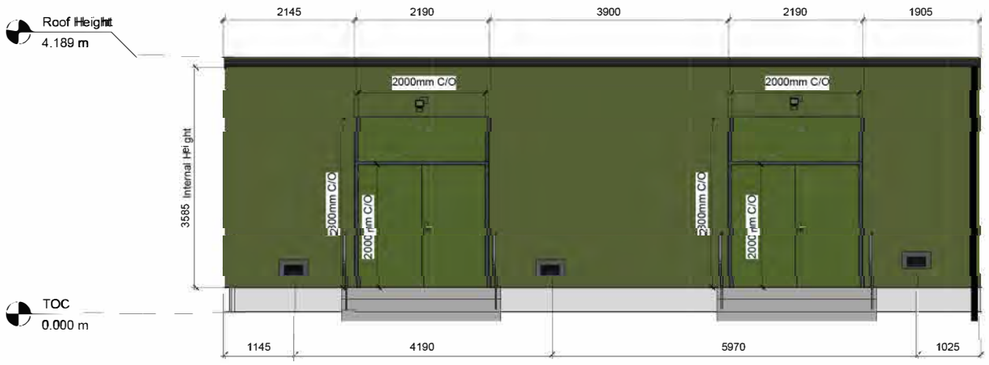
Green Switch CAPITAL

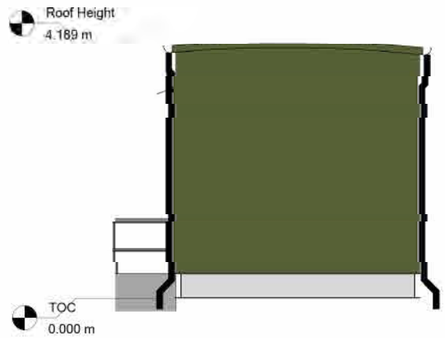
GREENSWITCH CAPITAL LTD.
FLOOR 5, EXCHANGE STATION
TITHEBARN ST.
LIVERPOOL
L2 2QP

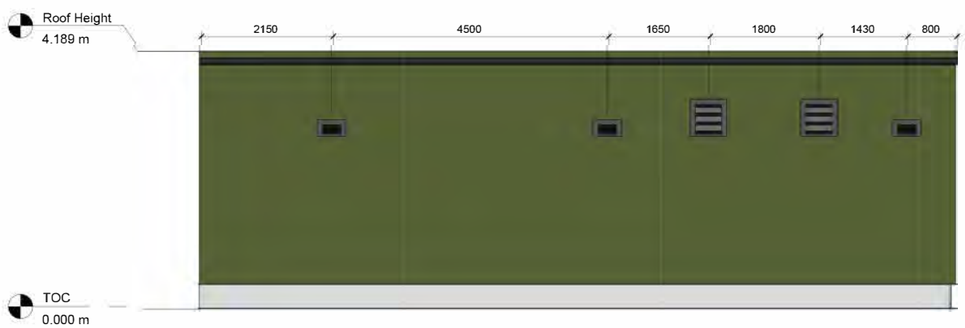
www.gscapital.uk | info@gscapital.uk

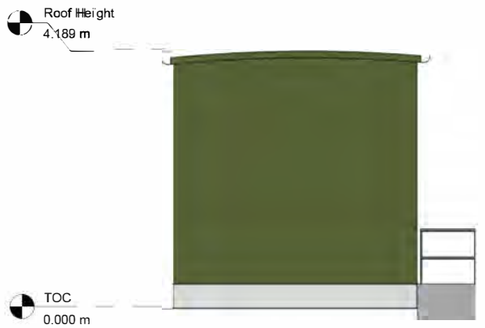












1:100

0 2m 4m 6m 8m 10m

LEGEND

FOR PLANNING

REVISION	DETAILS	DATE	DRAWN	APP'D

PROJECT

TITAN ENERGY
STORAGE FACILITY

DRAWING TITLE

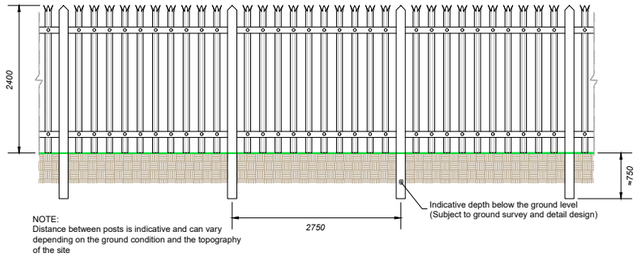
CUSTOMER SWITCHROOM

DRG No. 1079-P08	*REV* Issue
SCALE 1:100 @ A3	*DATE* 13/03/2025
DRAWN BY TO	*APPROVED* DH

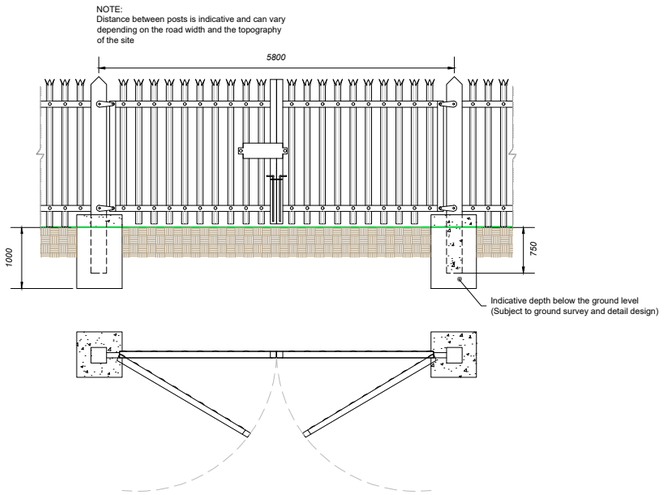
Green Switch CAPITAL

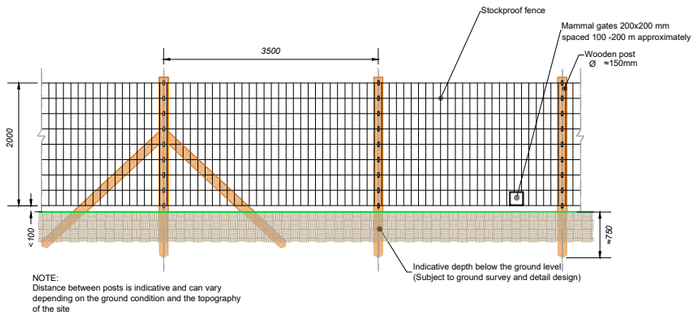
GREENSWITCH CAPITAL LTD.
FLOOR 5, EXCHANGE STATION
TITHEBARN ST.
LIVERPOOL
L2 2QP

www.gscapital.uk | **info@gscapital.uk**

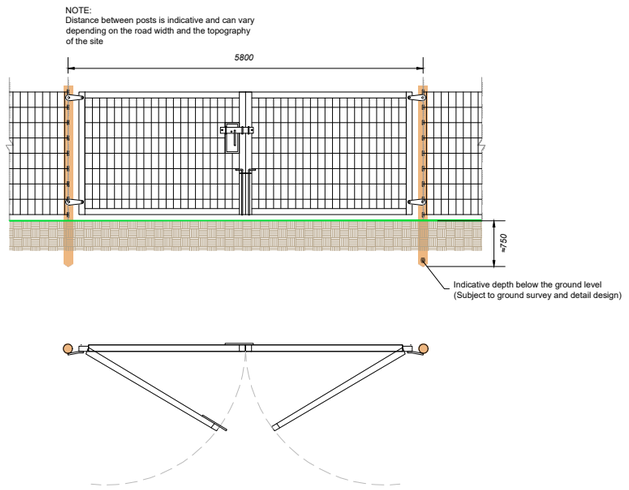


PALISADE FENCE





PERIMETER FENCE



1:100

2m 0 2m 4m 6m 8m 10m

NOTES

- All measurements are in mm

FOR PLANNING

REVISION	DETAILS	DATE	DRAWN	APP'D

PROJECT

TITAN ENERGY
STORAGE FACILITY

DRAWING TITLE

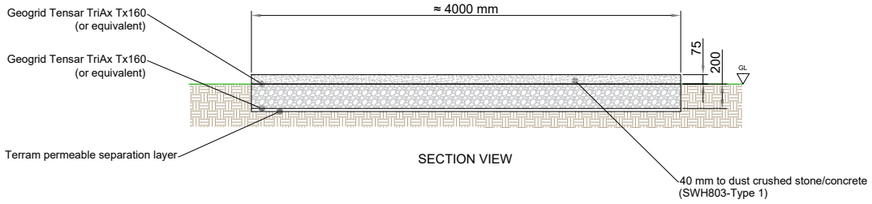
SITE FENCING AND GATES

DRG No. 1079-P07	*REV*
SCALE 1:50 @ A3	*DATE* 13/03/2025
DRAWN BY TO	*APPROVED* DH

Green Switch CAPITAL

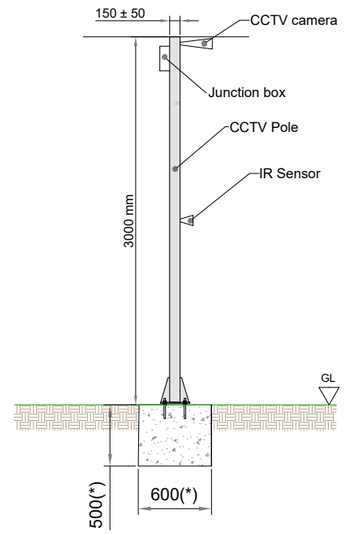
GREENSWITCH CAPITAL LTD.
FLOOR 5, EXCHANGE STATION
TITHEBARN ST.
LIVERPOOL
L2 2QP

www.gscapital.uk | info@gscapital.uk



SECTION VIEW

NOTE:
Road design assumes a CBR of <2%. In locations where ground conditions are worse, second layer of geogrid and additional SWH803 Type 2 will be required.



NOTE:
(*) Foundation depth is indicative and can vary depending of the ground condition and the topography of the site.

1:50

0 1m 2m 3m 4m 5m

LEGEND

FOR PLANNING

REVISION	DETAILS	DATE	DRAWN	APP'D

PROJECT

TITAN ENERGY
STORAGE FACILITY

DRAWING TITLE

ACCESS TRACKS
AND CCTV DETAIL

DRG No. 1079-P10	*REV* Issue
SCALE 1:50 @ A3	*DATE* 13/03/2025
DRAWN BY TO	*APPROVED* DH

Green Switch CAPITAL

GREENSWITCH CAPITAL LTD.
FLOOR 5, EXCHANGE STATION
TITHEBARN ST.
LIVERPOOL
L2 2QP

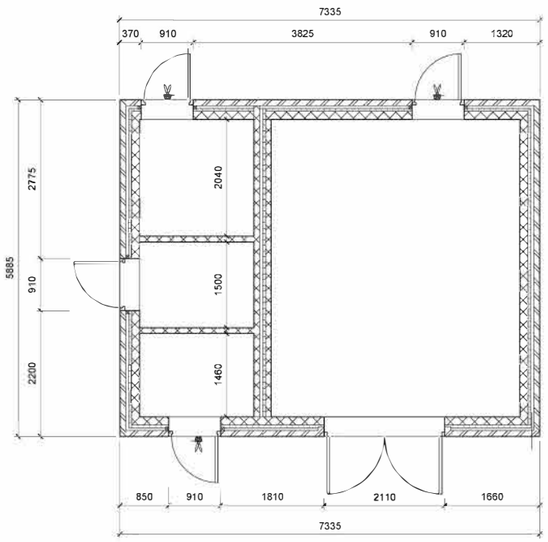
www.gscapital.uk | info@gscapital.uk

1 Front View
1 : 50

2 Right View
1 : 50

3 Rear View
1 : 50

4 Left View
1 : 50



5 Plan View
1 : 50

6 3D Perspective

1:100

0 2m 4m 6m 8m 10m

0 1m 2m 3m 4m 5m

FOR PLANNING

REVISION	DETAILS	DATE	DRAWN	APP'D

PROJECT

TITAN ENERGY
STORAGE FACILITY

DRAWING TITLE

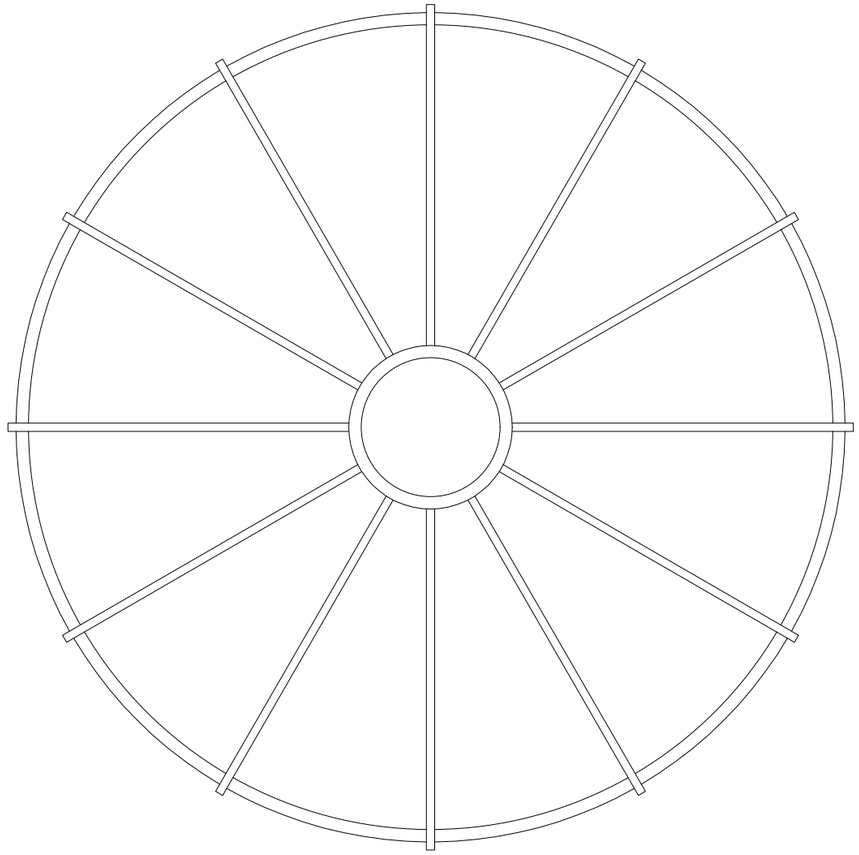
TSO CONTROL ROOM

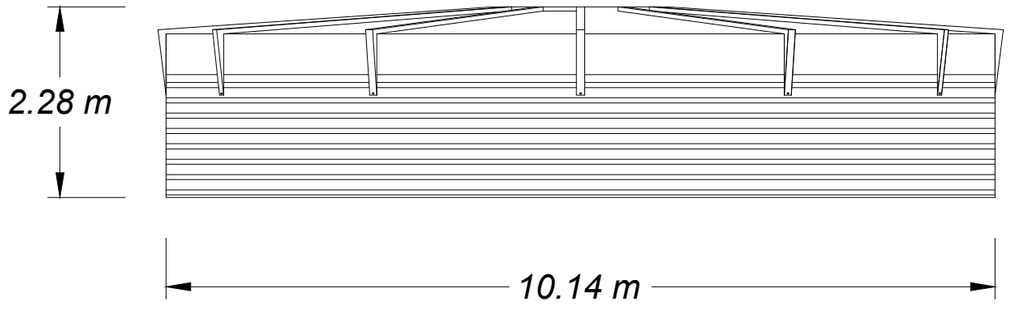
DRG No. 1079-P09	*REV* **Issue**
SCALE 1:100 @ A3	*DATE* 13/03/2025
DRAWN BY TO	*APPROVED* **DH**

Green Switch CAPITAL

GREENSWITCH CAPITAL LTD.
FLOOR 5, EXCHANGE STATION
TITHEBARN ST.
LIVERPOOL
L2 2QP

www.gscapital.uk | **info@gscapital.uk**





1:75

1.5m 0 1.5m 3m 4.5m 6m 7.5m

NOTES

FOR INFORMATION

REVISION	DETAILS	DATE	DRAWN	APP'D

PROJECT

TITAN ENERGY
STORAGE FACILITY

DRAWING TITLE

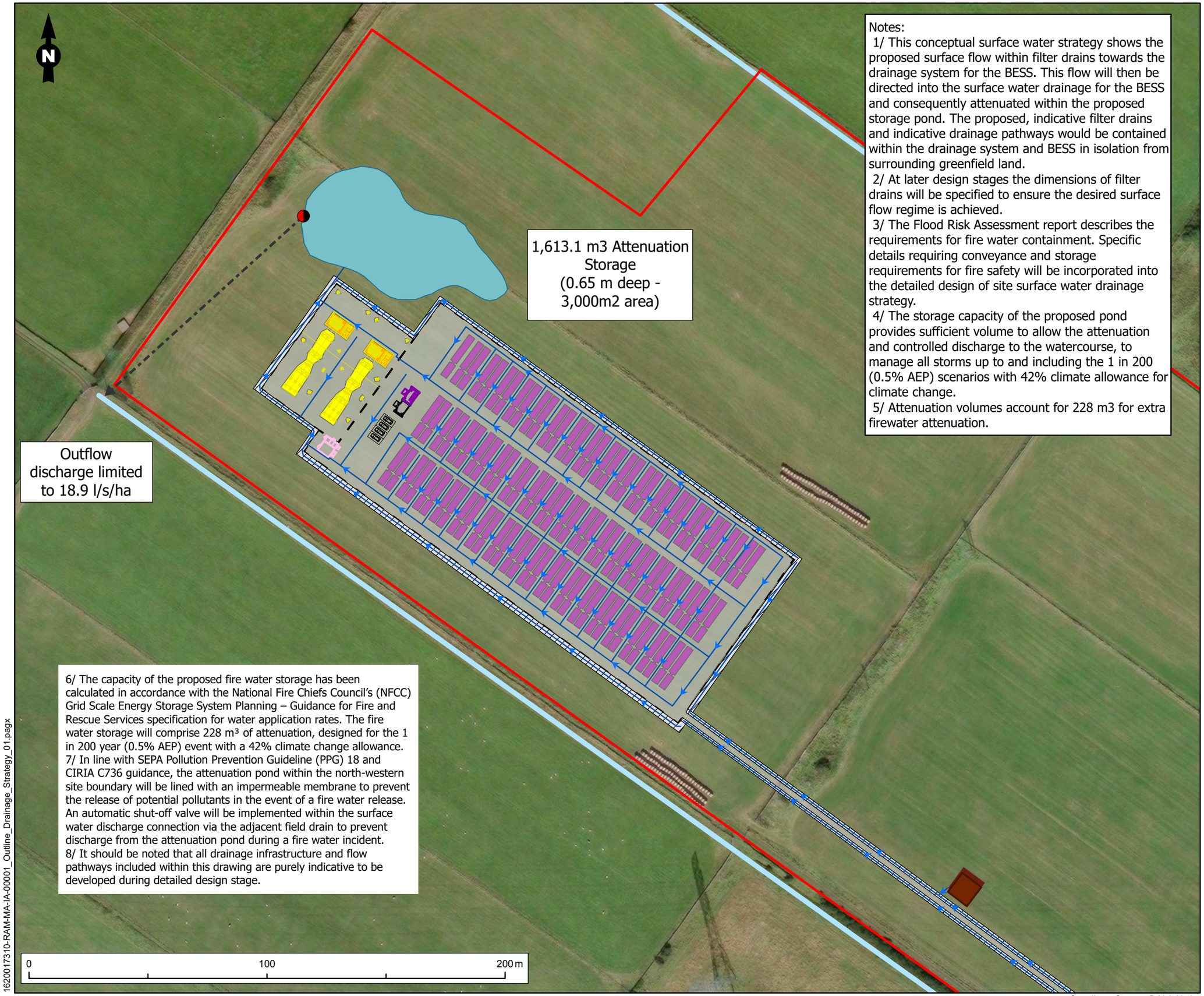
180,000L WATER STORAGE
TANK ELEVATION

DRG No.	*REV*
1079-P04	Issue
SCALE	*DATE*
1:75	13/03/2025
DRAWN BY	*APPROVED*
TO	DH

Green Switch CAPITAL

GREENSWITCH CAPITAL LTD.
FLOOR 5, EXCHANGE STATION
TITHEBARN ST.
LIVERPOOL
L2 2QP

www.gscapital.uk | info@gscapital.uk



Notes:
1/ This conceptual surface water strategy shows the proposed surface flow within filter drains towards the drainage system for the BESS. This flow will then be directed into the surface water drainage for the BESS and consequently attenuated within the proposed storage pond. The proposed, indicative filter drains and indicative drainage pathways would be contained within the drainage system and BESS in isolation from surrounding greenfield land.
2/ At later design stages the dimensions of filter drains will be specified to ensure the desired surface flow regime is achieved.
3/ The Flood Risk Assessment report describes the requirements for fire water containment. Specific details requiring conveyance and storage requirements for fire safety will be incorporated into the detailed design of site surface water drainage strategy.
4/ The storage capacity of the proposed pond provides sufficient volume to allow the attenuation and controlled discharge to the watercourse, to manage all storms up to and including the 1 in 200 (0.5% AEP) scenarios with 42% climate allowance for climate change.
5/ Attenuation volumes account for 228 m3 for extra firewater attenuation.

6/ The capacity of the proposed fire water storage has been calculated in accordance with the National Fire Chiefs Council's (NFCC) Grid Scale Energy Storage System Planning – Guidance for Fire and Rescue Services specification for water application rates. The fire water storage will comprise 228 m³ of attenuation, designed for the 1 in 200 year (0.5% AEP) event with a 42% climate change allowance.
7/ In line with SEPA Pollution Prevention Guideline (PPG) 18 and CIRIA C736 guidance, the attenuation pond within the north-western site boundary will be lined with an impermeable membrane to prevent the release of potential pollutants in the event of a fire water release. An automatic shut-off valve will be implemented within the surface water discharge connection via the adjacent field drain to prevent discharge from the attenuation pond during a fire water incident.
8/ It should be noted that all drainage infrastructure and flow pathways included within this drawing are purely indicative to be developed during detailed design stage.

Legend

- Site Boundary
- Assumed Impermeable Surface
- Fence
- Fire Water Storage
- BESS
- Substation
- Grid Transformer
- Field Drain
- Buildings
- Substation
- Parking
- DNO control room
- Client control room
- Fire water storage (10m x 10m)
- Indicative Drainage Pathways
- Attenuation Pond
- Outfall
- Filter Drain
- Penstock Valve

Figure Title
Outline Drainage Strategy

Project Name
Titan Storage Facility

Project No./Filery ID
1620017310/ REH2024N03971

Date	Figure No.	Revision
June 2026	Appendix 1	3.0

Prepared By	Scale
KR	1:1,500 @A3

Client
Green Switch Capital Ltd.

Green Switch CAPITAL

1620017310-RAM-MA-IA-00001_Outline_Drainage_Strategy_01.pagx

Coordinate System: British National Grid. Projection: Transverse Mercator. Datum: OSGB 1936.