

# Proposed Battery Energy Storage Site, Corriemoillie

PRE-APPLICATION CONSULTATION REPORT on behalf of Field Corriemoillie Ltd

Prepared by Alpaca Communications | November 2024



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#### 1. Introduction

- 1.1 This Pre-Application Consultation (PAC) Report sets out how Field Corriemoillie Ltd ("Field") conducted a programme of public consultation stakeholder engagement with regards to its proposal for a battery energy storage system (BESS), Field Corriemoillie ("the Site") on the land to the north east of the existing Corriemoillie Substation. It has been prepared in accordance with the Energy Consent's Unit's (ECU) Good Practice Guidance for Applications under Section 36 and 37 of the Electricity Act 1989 (the ECU Guidance).<sup>1</sup>
- 1.2 This document provides an overview of the consultation programme undertaken, the feedback received, and an explanation as to how that feedback led to changes to the scheme design.

# **Summary of Consultation**

- 1.3 Field began consultation by submitting a Proposal of Application Notice (PAN) to The Highland Council on 23 May 2024. It is noted that applications made under Section 36 of the Electricity Act 1989 to the Energy Consents Unit (ECU) are not subject to the same statutory requirements set out within Part 2 of the Town and Country Planning (Development Management Procedure) (Scotland) Regulations 2013 (the DMP) and revisions detailed within the Town and Country Planning (Pre-Application Consultation) (Scotland) Amendments Regulations 2021 (the PAC Amendment Regulations). The Highland Council (THC) nevertheless recommends that applicants follow the TCPA PAN process for Section 36 applications, to ensure interested parties are given appropriate time and notice to input into the planning process.
- 1.4 Field also carried out a programme of public consultation in line with the recommendations set out in Section 3.2 of the ECU Guidance, as well as the Scottish Government's Planning Advice Note (PAN) 3/2010: community engagement.<sup>2</sup>
- 1.5 A suite of consultation material was prepared for the Proposed Development, including information brochures, a website, newspaper advertisements and information boards, all of which are presented in this document.
- 1.6 Two in-person public consultation events were held at Garve Public Hall, Station Road, Garve, Ross-shire from 2pm-7pm on Wednesday 29<sup>th</sup> May 2024 and Wednesday 21<sup>st</sup> August 2024.

# **Approach to Consultation**

- 1.7 Alpaca Communications was appointed by Field to assist with the pre-application public consultation on the Proposed Development. Alpaca Communications is a specialist public consultation agency with broad expertise in advising on and implementing consultation programmes for both private and public-sector clients.
- 1.8 Field recognises the importance of early and meaningful public and stakeholder consultation to ensure stakeholder perspectives are considered from the initial stages of project planning and design. By proactively seeking feedback in the pre-application stage, Field has been able to adapt

November 2024 2

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<sup>&</sup>lt;sup>1</sup> https://www.legislation.gov.uk/ukpga/1989/29/section/36

 $<sup>^{2} \</sup>underline{\text{https://www.gov.scot/publications/good-practice-guidance-applications-under-sections-36-37-electricity-act-1989/pages/3/; \underline{\text{https://www.gov.scot/binaries/content/documents/govscot/publications/advice-and-guidance/2010/08/pan-3-2010-community-engagement/documents/pan-3-2010-pdf/govscot%3Adocument/pan%2B3%2B2010.pdf}$ 

its proposal to address the concerns of, and feedback from, the local community and other relevant stakeholders where possible.

1.9 Field's programme of public consultation ensures the final planning application has been underpinned and informed by an inclusive and thorough consultation process. Field is also committed to continued engagement as the development progresses and after the planning application has been lodged.

# 2. Policy Guidance

- 2.1. Field's approach to engagement for the proposals was guided by the principles provided within Section 3 of the ECU Guidance and the Scottish Government's Planning Advice Note (PAN) 3/2010: community engagement.
- 2.2. As detailed within Section 1.1 above, the Applicant submitted a PAN, as requested by THC, in accordance with the DMP.
- 2.3. In particular, in relation to the ECU Guidance, the following recommendations have been followed:
  - Holding at least two public consultation events prior to submitting the application, with the final public event held at least 14 days after the first public event.
  - Publishing on Field Corriemoillie's website and in a local newspaper notice of each event at least seven days beforehand, and which contains the following:
    - o a description of, and the location of, the proposed development.
    - details as to where further information may be obtained concerning the proposed development.
    - o the date and place of the public event.
    - o a statement explaining how, and by when, persons wishing to make comments to Field relating to the proposal may do so; and
    - a statement that comments made to Field are not representations to the Scottish Ministers and if Field submits an application there will be an opportunity to make representations on that application to the Scottish Ministers.
  - Preparation of this Pre-Application Consultation (PAC) Report.
- 2.4. In accordance with PAN 3/2010, Field has adopted a positive approach to engagement which met the following key aims:
  - Community engagement must be meaningful and proportionate;
  - Community engagement must happen at an early stage to influence the shape of plans and proposals; and
  - It is essential for people or interest groups to get involved in the preparation of development plans as this is where decisions on the strategy, for growth or protection, are made.

# 3. Project Overview

- 3.1 The Proposed Development is on land to the northeast of the Corriemoillie Substation. The site location can be found below in Figure 1.
- 3.2 The Proposed Development is for the construction of a Battery Energy Storage System (BESS) with a capacity of up to 200 MW including associated infrastructure and ancillary works.
- 3.3 The Proposed Development would charge and discharge from the electricity transmission network via the adjacent Corriemoillie Substation.
- 3.4 Whilst the exact battery specifications are still to be determined and will be confirmed as part of the detailed design stage during pre-construction, the principal components of the Proposed Development that form the application for planning consent include:
  - A BESS compound each comprising:
    - o Individual battery storage units arranged into rows.
    - Medium voltage (MV) skids (one per pair of battery storage units), each of which houses two power conversion system (PCS) units and one medium-voltage transformer.
    - Ancillary infrastructure including low-voltage cabinets, auxiliary transformers and underground ducting and cabling.
  - A high-voltage substation compound comprising:
    - High-voltage grid transformers
    - Auxiliary transformers and low-voltage distribution infrastructure
    - An on-site substation building, comprising a control room, high voltage switch room and welfare facilities.
  - 5 m high acoustic barriers along the southern and south-eastern boundary of the site and 3 m high palisade security fencing.
  - Cut and fill / earthworks and foundational civil structures to create level compounds upon which the batteries, substation and other ancillary structures will be located.
  - An underground 132 kV grid connection cable between the substation compound and the Corriemoillie Substation.
  - Access arrangements, including two separate access points into the BESS compound.
  - Stockproof fencing around the perimeter of the site.
  - CCTV and lighting columns across the battery and substation compounds.
  - Drainage infrastructure, including one attenuation ponds.
  - Landscape and biodiversity mitigation and enhancement

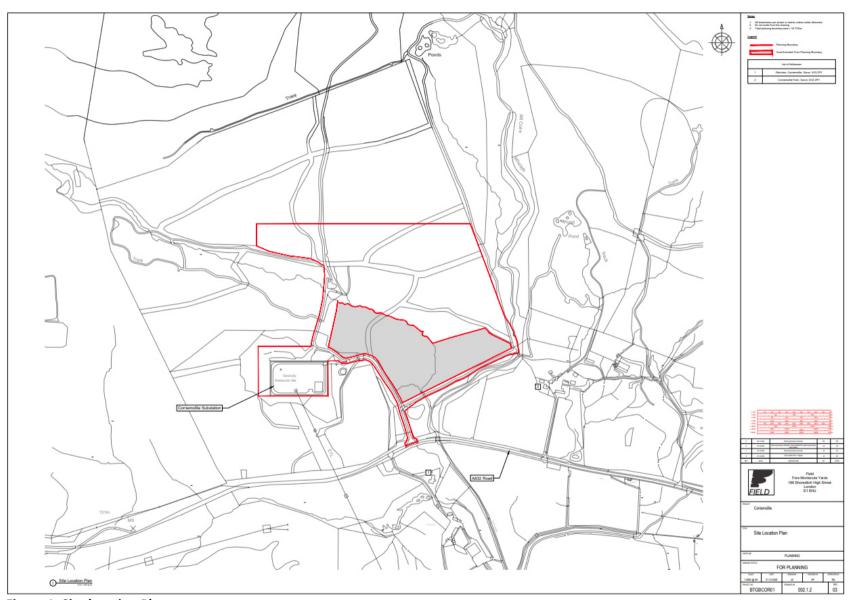


Figure 1: Site location Plan

#### 4. Public Consultation

#### **Consultation Aims**

The aims of the consultation were as follows:

- To work with local stakeholders and local residents from an early stage of the Project design to provide them the opportunity to comment on the Proposed Development;
- To raise awareness of the Proposed Development within the local community and to gain their valuable insight based on their local knowledge;
- To gain a firm understanding of the key issues and areas of concern affecting the local community and other key stakeholders;
- To work with key stakeholders to agree key topic areas and associated scopes and methodologies of assessments;
- To ensure the local community and key stakeholders had the opportunity to give feedback on the Proposed Development;
- To provide feedback to the local community based on their comments and concerns;
- To include their feedback within the final Project design, as far as reasonably practicable; and
- To provide a robust planning application including comprehensive assessments and reporting.

#### **Consultation Overview**

- 4.1 Consultation on the Proposed Development began on 21<sup>st</sup> May 2024, when the development team contacted the site and neighbouring community councils (**Appendix 1**) for a briefing regarding the Proposed Development.
- 4.2 Field submitted a PAN for the Proposed Development to The Highland Council on 23<sup>rd</sup> May 2024 (**Appendix 2**).
- 4.3 Field engaged with the site and neighbouring community councils (CCs): Garve and District CC, Strathpeffer CC, Contin CC and Marybank, Scatwell and Strathconon CC with an invitation to the events, a copy of the brochure, and to offer a meeting.
- 4.4 Field also engaged with the former Ross, Skye and Lochaber MP Ian Blackford, as well as the Caithness, Sutherland and Ross MSP Maree Todd. Both were provided with a copy of the brochure, offered a briefing, and invited to the consultation event.
- 4.5 Alongside the community councils and local MPs and MSPs (including regional list), Field contacted site ward councillors (Ross, Strathpeffer and Lochalsh) on 24<sup>th</sup> May, again with a copy of the brochure, invitation to the public consultation events, and an offer of a personal briefing (**Appendix 1**). Tim Eagle MSP responded to the PAN notification, to inform that his colleague Edward Mountain MSP covers this area of the Highlands.
- 4.6 Members of the Highland Council Leadership Team were also invited to the events, including the Leader of the Council, the Chair of the Economy and Infrastructure Committee, and the Chair of the Climate Change Committee (**Appendix 1**).
- 4.7 A website for the Proposed Development (**Appendix 3**) was created, which can be accessed at the following address: <a href="www.fieldcorriemoillie.co.uk">www.fieldcorriemoillie.co.uk</a>. The website includes an overview of the Proposed Development, details of consultation events, copies of all brochures and information

boards that were available at the consultation events for those that could not attend, a contact email address and feedback form.

- 4.8 A brochure and invite (**Appendix 4**) were sent out on 21<sup>st</sup> May to 134 addresses (see **Appendix 5** for postal distribution area). The 134 addresses covered all addresses within a minimum of 2 km radius from the Proposed Development. The brochure invited them to the two public consultation events at Garve Public Hall, Station Road, Garve, Ross-Shire, IV23 2PR from 2pm-7pm on Wednesday 29<sup>th</sup> May 2024 and Wednesday 21<sup>st</sup> August 2024.
- 4.9 Field advertised the public consultation events in a local newspaper (**Appendix 6**). The first public consultation event was advertised in the *Inverness Courier* on Tuesday 21<sup>st</sup> May, 2024, and the second public consultation event was advertised in the *Inverness Courier* on Tuesday 13<sup>th</sup> August, 2024.
- 4.10 Attendees were made aware that pre-application consultation does not remove their right or the potential need to comment on the final application once it is made to the planning authority. Attendees were informed that details of how to comment on the final application would be made available via the project website.

#### **First Public Consultation Event**

- 4.11 The first public consultation event was held at Garve Public Hall, Station Road, Garve, Ross-Shire, IV23 2PR from 2pm-7pm on Wednesday 29<sup>th</sup> May 2024. Nine display boards were presented to the public, which included information about Field, an overview of the Proposed Development and responses to frequently asked questions about BESS technologies (see Appendix 7). This event was undertaken during an early stage of the design process and the public were able to provide comments on the Proposed Development based on those early stage design studies.
- 4.12 Figure 2 below shows a copy of the early stage concept layout which was presented on the information boards. A more detailed indicative layout plan was also presented for discussion in A3 printed format (Appendix 9).



Figure 2: Concept design presented at the first Public Consultation Event

- 4.13 A total of 14 people attended the first consultation event.
- 4.14 The feedback at the first consultation event can be summarised as follows:
  - Concerns over road access and disruption following the installation of traffic signals on the Contin to Garve road;
  - Concerns surrounding the 'weak bridge' that leads to Corriemoillie substation that may result in HGV loads needing to be split;
  - Interest in the community benefits provided as part of the Proposed Development; and
  - Concerns about safety and fire risk.
- 4.15 Field's response to this feedback is provided in the table below at section 4.27.

### **Second Public Consultation Event**

- 4.16 The second public consultation event was held at Garve Public Hall, Station Road, Garve, Ross-Shire, IV23 2PR from 2pm-7pm on Tuesday 9th August 2024.
- 4.17 All political stakeholders (**Appendix 1**) were contacted again on 12<sup>th</sup> August 2024 to invite them to the second consultation event.
- 4.18 In response to the feedback received at the first consultation event, 7 additional display boards were presented at the second event (**Appendix 8**). These additional boards contained information regarding;
  - Information about the Construction Traffic Management Plan
  - Information regarding Field's other sites across Scotland and the UK
  - An additional FAQ board, which covered questions relating to Field Corriemoillie as an SPV, the wider benefits of BESS, why batteries are needed in the Highlands, and how noise impact has been assessed and managed
  - A blank board for Community benefit suggestions
  - Further information about fire safety plans
- 4.19 An updated layout board provided details of the latest design of the Proposed Development. An updated FAQ board was also produced to replace those presented at the first event.
- 4.20 A total of 6 people attended the second consultation event.
- 4.21 The feedback at the second consultation event can be summarised as follows:
  - Concerns regarding visual impact of the Proposed Development;
  - Concerns in relation to the proposed construction access routes;
  - Interest in the types of planting that would be used for screening; and
  - Concerns about safety and fire risk.
- 4.22 Field's response to the feedback provided may be found in the table below at section 4.27.

# **Consultation Feedback**

4.23 Three completed feedback forms were received from attendees following the events. The results are presented below.

4.24 The feedback form included two multiple choice tick box questions and a space for additional comments.

# Question 1: Has this brochure been helpful in understanding our proposal?

YES	NO	NO ANSWER
1	0	2

### Question 2: With regards to the proposals you have read about within this brochure, are you:

IN FAVOUR	IN OBJECTION	OF NO OPINION
0	3	0

# **Question 3: Additional comments**

- 4.25 All three feedback forms contained additional comments. **Appendix 10** contains those comments in full, in addition to Field's response.
- 4.26 Overall, feedback offered constructive insights on the Proposed Development, with respondents sharing addressable perspectives on the scheme.
- 4.27 Feedback received during the pre-application consultation process for the Proposed Development has provided Field with an understanding of the key concerns of key stakeholders and the local community. The key issues raised and a summary of how Field has addressed these issues is provided below.

Key Issues Raised	Field's Response
Concern over the fire risk on the BESS site	Field is an industry leader in relation to fire safety. Workstreams undertaken by Field in relation to BESS fire safety include: sitting on government working groups to help define BESS fire safety standards, working closely with suppliers to understand the latest BESS safety features and fire safety testing, and engaging with local fire and rescue services.
	Field has prepared an Outline Battery Safety Management Plan (OBSMP) to accompany the planning application. The OBSMP details Field's approach to battery safety management, including all measures in place to firstly reduce the risk of a fire event, as well as ensure that an emergency event is responded to safely. These measures include careful equipment selection, compliance with relevant guidance and legislation, consideration of fire safety in site design, and ongoing engagement with the local fire and rescue service.
Interest in screening and type of flora to be used	The Proposed Development has been designed to utilise existing landform and commercial forestry along the southern boundaries of the Site, to minimise views of the Proposed Development from sensitive landscape and visual receptors within the surrounding area. In addition to this, further screening is included within the submitted Landscaping Plan, to further minimise adverse landscape and visual impacts. A robust Landscape and Visual Impact Assessment (LVIA) has been completed to ensure the Proposed Development is compliant with national and local planning policy in relation to landscape and visual impacts.

	The Landscaping Plan has been appropriately designed to use native woodland and heathland species to compliment the existing ecological baseline. This includes the creation and retention of wet heathland habitats and native scrub woodland onsite, ultimately resulting in a biodiversity net gain of greater than 10% for the Proposed Development.
Concern about the potential impacts on the A835 caused by construction traffic and transport.	Following further assessment undertaken by Pell Frischmann as the appointed transport consultant for the project, Field responded to these comments as part of the second public consultation event, providing further information on the maintenance and enhancement of the A835. Further information was provided in relation to Transport Scotland's ongoing works along the A835 and ongoing HGV access along the route through any maintenance works. A detailed technical assessment of potential construction traffic impacts has been undertaken within the submitted Construction Traffic Management Plan (CTMP) included within this S.36 application, also concluding that none of the public bridges along the construction traffic route possesses a weight limit.
Interest in broader community benefits	Field has committed to working with the National Schools Partnership to design a school-based education programme for schools surrounding the Proposed Development. The programme, which launched in August 2024, supports educators to offer secondary school students essential information about the various job opportunities available in the energy sector, the required training for these positions, and the pathways to follow for pursuing these careers. Field has identified target schools for the programme, based on a catchment area from the Proposed Development.  This demand-led education strategy bolsters the region's capability to maximise the employment opportunities available in the wider energy transition.

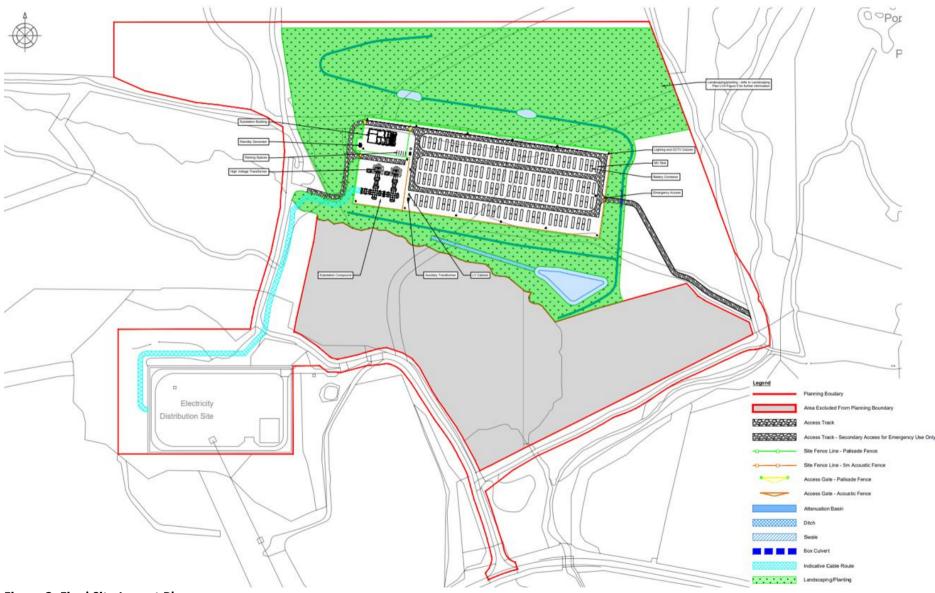


Figure 3: Final Site Layout Plan

# 5. Other Consultation

5.1 In addition to the public consultation described in section 5, the Applicant has carried out extensive consultation with other relevant stakeholders and government agencies to inform the development of the planning application. This consultation is summarised below, and additional information is available within each relevant technical assessment.

Consultee	Summary	Relevant Assessment
The Highland Council, Planning	Pre-application consultation was undertaken with the Highland Council's Planning team through the PAN consultation process (THC ref. 24/02669/PAN). The subsequent decision notice provided detailed material considerations that would be considered when a planning application is received. Based on the information provided, TNEI have undertaken a Planning Appraisal of the Proposed Development in line with those material consideration raised by the Highland Council, as well as other material considerations which are understood to be relevant.	Planning, Design and Access Statement (TNEI, 2024)
	Time constraints associated with the Highland Council's preapplication advice service inhibited the project's ability to complete pre-application advice with the Highland Council in line with commercial restrictions place of the project's programme. It is however understood all technical reporting included within this Section 36 submission has addressed for any concerns that may be raised or recommended during this pre-application advice process.	
The Highland Council, Environmental Health Officer (North) (EHO)	Pre-application consultation was undertaken with the Highland Council's EHO. The EHO has agreed the methodology for the noise assessment and specified the criteria that are required to be met for the noise assessment. The consultation is documented in the Noise Impact Assessment.	Noise Impact Assessment (WSP, 2024)
The Highland Council, Transport Planning	No formal response or concerns were raised by the Highland Council's Transport Planning Officer during the PAN consultation or determination process. For this reason, no further consultation was undertaken with this consultee with a robust technical assessment undertaken in the form of the submitted Transport Statement and CTMP.	Transport Statement and CTMP (Pell Frischmann, 2024)
The Highland Council, Landscape Officer	TNEI requested pre-application consultation with the Highland Council's Landscape Officer. The purpose of this approach was to agree on selected viewpoints to be included within the Landscape and Visual Assessment (LVA). In absence of a response from the Landscape Officer, the viewpoints included within the LVA have been selected based on the professional advice and assessment undertaken by TGP.	Landscape and Visual Appraisal (TGP, 2024)
Scottish Environmental Protection Agency (SEPA)	Haydn Evans as the appointed Flood Risk and Drainage Consultant for the project, sought pre-application advice from SEPA via email to review and agree on the proposed flood risk and drainage strategy included within this S.36 submission. SEPA	Flood Risk Assessment and Drainage Impact

Consultee	Summary	Relevant
		Assessment
	subsequently directed Haydn Evans towards the water	Assessment
	permitting team at SEPA for further information on regulatory	(Haydn Evans,
	advice and discharge to watercourses. No further drainage	2024)
	advice could be provided at this stage with a recommendation to	
	seek pre-application consultation advice via the Highland	
	Council's formal pre-application advice service discussed above.	

# 6. Design Changes Following Consultation

6.1. Over the course of the pre-application consultation period, Field has made several changes to the site design as a result of stakeholder engagement, the progression of environmental studies and constructability requirements. In addition to design changes, Field has also committed to the development of additional technical assessments to accompany the planning application in response to points raised during the consultation period.

# 6.2. These changes include:

- Inclusion of a secondary emergency access point into the BESS compound to allow alternative access points to account for prevailing wind conditions, as well as the submission of an Outline Battery Safety Management Plan.
- Embedded biodiversity retention and enhancement to ensure the Proposed Development delivers significant biodiversity enhancements in accordance with relevant policy and guidance.
- Construction of acoustic walls along the southern and south-eastern boundary to reduce noise impacts on surrounding noise sensitive receptors.
- Reduction of the overall development footprint and impact profile through the selection of a smaller candidate battery technology.
- Introduction of an attenuation basin to ensure surface water run-off does not exceed greenfield run-off rate.
- Implementation of looped internal access roads to ensure vehicles can traverse the site in forward gear.
- Submission of a Construction Traffic Management Plan (CTMP) to demonstrate there are no significant impacts on traffic during the construction, operation or decommissioning of the Proposed Development.

#### 7. Conclusion

- 7.1. Feedback highlighted local concerns and perspectives regarding the Proposed Development, offering useful insights for further review. Most feedback related to construction traffic and fire safety associated with BESS technology.
- 7.2. Field ensured that the concerns and questions of the local community were addressed through the provision of additional information at the second consultation event, as well as detailing further on the ongoing impact assessments in areas of concern.
- 7.3. In addition to public consultation, Field has undertaken extensive consultation with other key stakeholders, including relevant departments within The Highland Council, as well as Scottish Environmental Protection Agency (SEPA).
- 7.4. The feedback and advice received through consultation with the community and relevant stakeholders has informed the final design and supporting technical assessments to ensure all relevant planning and environmental issues have been appropriately considered.

# 8. Appendices

- Appendix 1: List of contacted stakeholders
- Appendix 2: Proposal of Application Notice (PAN) including PAN Covering Letter and Site Location Plan
- Appendix 3: Field Corriemoillie website
- Appendix 4: Local resident invite brochure
- Appendix 5: Local resident invite brochure distribution area
- Appendix 6: Public consultation event newspaper adverts
- Appendix 7: First consultation event boards
- **Appendix 8:** Second consultation event boards
- Appendix 9: A3 printed indicative layout for consultation
- Appendix 10: Comments received via feedback form and Applicant's response

# **Appendix 1: List of Stakeholders contacted**

Name	Position
Cllr Raymond Bremner	Leader of the Council
Cllr Ken Gowans	Chair, Economy and Infrastructure Committee
Cllr Sarah Fanet	Chair, Climate Change Committee
Cllr Dr Chris Birt	Site Ward Councillor (Wester Ross, Strathpeffer and Lochalsh)
Cllr Biz Campbell	Site Ward Councillor (Wester Ross, Strathpeffer and Lochalsh)
Cllr Patrick Logue	Site Ward Councillor (Wester Ross, Strathpeffer and Lochalsh)
Cllr Liz Kraft	Site Ward Councillor (Wester Ross, Strathpeffer and Lochalsh)
lan Blackford/ Jamie Stone (boundary changes for 2024 election)	Site MP (Caithness, Sutherland and Easter Ross)
Maree Todd	Site MSP (Caithness, Sutherland and Ross
Douglas Ross	Regional List MSP (Highlands and Islands)
Edward Mountain	Regional List MSP (Highlands and Islands)
Rhoda Grant	Regional List MSP (Highlands and Islands)
Tim Eagle	Regional List MSP (Highlands and Islands)
Ariane Burgess	Regional List MSP (Highlands and Islands)
Jamie Halcro Johnston	Regional List MSP (Highlands and Islands)
Emma Roddick	Regional List MSP (Highlands and Islands)
Garve and District CC	Site Community Council
Marybank, Scatwell and Strathconon CC	Neighbouring Community Council
Contin CC	Neighbouring Community Council
Strathpeffer CC	Neighbouring Community Council

The below email was sent to all stakeholders listed above ahead of the first consultation event, along with a copy of the consultation brochure. A follow up email was sent ahead of the second consultation event.

# Dear XXXXXX,

I am contacting you by way of courtesy on behalf of <u>Field</u> regarding proposals for a battery energy storage system (Field Corriemoillie) on land north of the A832 and east of Corriemoillie Substation, IV23 2PY. The battery will have a capacity of up to 200 MW and will store and provide electricity to create a greener and more stable grid.

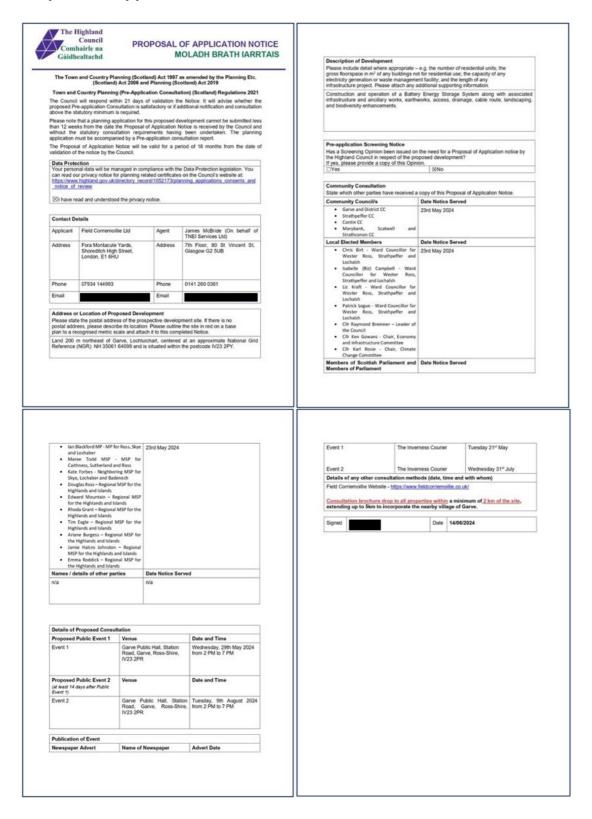
We will be holding our first public consultation event on Wednesday 29<sup>th</sup> May 2pm-7pm, at Garve Public Hall, Station Road, Garve, Ross-Shire, IV23 2PR. This will provide the local community with information about the proposal and give them the opportunity to ask any questions they may have.

Please find attached a brochure with further information about our proposal and public consultation events, which will shortly be sent to local households. We also have a project website which may be accessed at <a href="https://www.fieldcorriemoillie.co.uk">www.fieldcorriemoillie.co.uk</a>.

Please do let me know if you have any questions or if you would like a briefing on the proposal. Alternatively, we would be glad to welcome you at our events.

# Appendix 2: Proposal of Application Notice (PAN) including PAN Covering Letter and Site Location Plan

# **Proposal of Application Notice**



# **Covering Letter**



Ref: 16621-002-R1

Copy: Sent by email only to -eplanning@highland.gov.uk

Planning and Building Standards ePlanning Centre The Highland Council Glenurguhart Eoad Inverness IV3 5NX

NOTIFICATION OF PROPOSAL OF APPLICATION NOTICE (PAN) FOR PROPOSED BATTERY ENERGY STORAGE SYSTEM (BESS) DEVELOPMENT WITH AN INSTALLED STORAGE CAPACITY OF UP TO 200 MW ON LAND 200M NORTHEAST OF CORREMOBILIE SUBSTATION, GARVE, LOCHLUICHART, N'23 ZIY.

On behalf of Field Corriemoille Limited (Field/the Applicant), TNEI Services Limited (TNEI) has enclosed Proposal of Application Notice (PAN) for the construction and operation of a Battery Energy Storage System (BESS) with an installed storage capacity of up to 200 MW (the Proposed Development) located on land 200 m northeast of Corriemoille Substation, Garve, Lockwickhart (the

The Site is approximately centered at National Grid Reference (NGR) NH 35061 64099, the nearest postcode is IV33 2FY, and the total Site area is c. 17.5 hectarse (Na) however, c. 11.7 ha of the Site area will incorporate the BISS development area, while the remaining C.5.8 ha will constitute the indicated Grid Connection and Access Corridor. The Site's location is identified as per the field line Boundary contained within the attached Site Location Plan (figure et al. 1622-203.R1) substantial alongside this document, and the completed application form; taken together these documents constitute the PAR Notification require.

The Proposed Development will have an installed storage capacity of up to 200 MW, subsequently requiring the Applicant to submit a Section 36 (356) Application under the Electricity, Act [1599] to the Chergy Connects Vinit (EQU) for determination by the Section Ministers. A PAN is not a statutory requirement for an application made under 356 of the Electricity Act 1399 and is therefore submitted alongside this document under the specific direction of the Righland Count (THC).

As this application includes a S36 submission to the Scottish Ministers under the Electricity Act, the Proposed Development is not a major development as indicated within The Town and Country Planning (Hierarchy of Development) (Scotland) Regulations 2009. The site and scale of the total Site Area included within this application is however consistent with that of a major development had it been subject to determination under the TCPA.

The purpose of submitting a PAN is to inform THC of the pre-application process the Applicant proposes to undertake ahead of the SSB submission. A Pre-Application Consultation Report (PAC Report) will be submitted alongiside the SSB application to detail the outcomes of the pre-application consultation process.

Newcastle 7th Floor, West One Forth Banks Newcastle Upon Tyre NE1 3PA

On the basis that the submission of this Notice commences the non-statutory 12-week pre-application consultation process, the Applicant will commence with pre-application public consultation activities by engaging with the local community and other key takeholders to explain and obtain feetback prior to the submission of an application for consent under Section 10 of the Electricity Act 1989 and associated deemed planning permission—ournelly expected in October 2024.

Although a \$36 application, the Applicant is keen to draw pairly with requirements under the Town and Country Planning (Scotland). Act 1997 and its corresponding relevant Regulations. The information below, such as the consultation startegy, outlines our understanding of Part 2 of the form and Country Planning (Development Management Procedure) (Scotland) Regulations 2013 and resistons detailed within the Town and Country Planning (Per-Application Consultation) (Scotland) Amendment Regulations 2021 (the PAC Amendment Regulations) and how we intent to comply with these.

- Provide formal written notification to relevant locally elected members;
   Provide the PAN to the community council within which the Proposed Development is located, and to those adjoining;
   Hoold at least 2 No. public events; and
   Publish in a local mexpaper.

Following these events, the Applicant will summarise the outcomes of all consultation discussions and events within a PAC Report – which will be provided in support of the S36 application.

The following information is provided to allow for the acceptance of this PAN by THC:

Public Events
The Applicant will host two public events at the Garve Public Hall, Station Road, Garve, Ross-Shire,
VIS3 2PR. These two events are spaced a minimum of two weeks apart from each other and each
advertised within the local newspaper inverness Courier, no less than seven days prior to the event
taking place. The dates for the public events are as follows:

The public events will include professional and expert attendance and will be undertaken in a drop-in session format. Comments cards will be made available for members of the public or interested stakeholders/third parties to provide comments to the Applicant and the development team.

Correspondence with Elected Officials
 The Proposed Development is located within Wester Ross, Strathpeffer and Lochalsh (Ward 05). As part of the PAC process, and prior to the public events taking place, the Applicant will directly engage with the ward members of this Council ward. At the time of submission, the members who will be contacted in writing are:

- Chris Birt Wand Councillor for Wester Ross, Strathpeffer and Lochalsh
  Isabelle (Birl Campbell Ward Councillor for Wester Ross, Strathpeffer and Lochalsh
  Lit Kraft Ward Councillor Wester Ross, Strathpeffer and Lochalsh
  Patrick Logue Ward Councillor for Wester Ross, Strathpeffer and Lochalsh

Each elected member will receive notification of the dates for the public events, alongside an invitation to attend. They shall also be advised of the contact information for the Applicant and/for their agent (TNRI). Formal correspondence with elected members will take place in writing via email.

Additional public representatives have also been contacted to request engagement prior to the put events taking place, including the following:

- Clir Raymond Bremner Leader of the Council

  Clir Ken Gowans Chair, Connomy and Infrastructure Committee

  Clir Karl Rosie Chair, Connomy and Infrastructure Committee

  In Blackford MP MF for Ros S, Sey and Lochaber

  In Blackford MP MF for Ros S, Sey and Lochaber

  Maree Todd MSP MSP for Cathness, Subertaind and Ross

  Rate Forbes Neighboring MSF for Skye, Lochaber and Badenoch

  Douglas Ross Regional MSF for the Highlands and Islands

  Rhoda Grant Regional MSF for the Highlands and Islands

  Tim Eager Regional MSF for the Highlands and Islands

  Ariane Burgess Regional MSF for the Highlands and Islands

  Jamie Halford Johnston Regional MSF for the Highlands and Islands

  Emma Roddick Regional MSF for the Highlands and Islands

  Emma Roddick Regional MSF for the Highlands and Islands

Correspondence with Community Councils

the same time as the notification to the Elected Officials provided above, written notification of troposed Development and the public event details will be given to the following Community Coun

- Garve and District CC
  Strathpeffer CC
  Contin CC
  Marybank, Scatwell and Strathconon CC

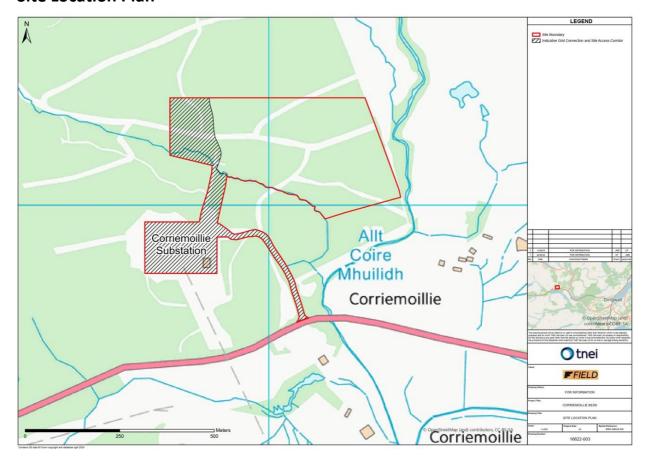
4. PAC Report Following the completion of our pre-application consultation activities, we will prepare a PAC Report to accompany the planning application. This will provide a summary of the feedback received, highlighting any specific issues which the public may have raised in respect of the proposed development, and which resulted in modifications to the scheme. Any comments received in writing either during the consultation events, or otherwise will be retained and evidenced within the PAC Report.

We trust that the information provided on our intended pre-application consultation for the Proposed Development is acceptable, and that you can confirm that the formal 12-week application consultation period for these proposals can commence.

Should you require any further information at this stage, please do not hesitate to contact me directly.

Encl. The Highland Council PoAN Form (completed) Site Location Plan

# **Site Location Plan**



# **Appendix 3: Field Corriemoillie Website**

# **Home Page**



Field builds and operates large batteries which store energy to help create a greener, more stable electricity grid.

We'd like to build one of these batteries, Field Corriemoillie, on land north of the A832 and north-east of Corriemoillie Substation, IV23 2PY.

Providing up to 200 MW of electricity to create a greener & more stable grid.

Why do we need big batteries?

To reach net zero, increase energy security and help reduce energy bills, we need to store renewable energy and improve the electricity grid's stability and reliability.

Our batteries are designed to fill gaps in the UK's electricity supply by charging up when renewable energy is being produced (such as on windy or sunny days) and discharging energy back into the grid when needed (e.g. when the wind isn't blowing, the sun isn't shining, or we aren't able to import energy from elsewhere). This ensures plenty of energy is available for people to make their morning cuppa, even on a calm, overcast winter's day.

These batteries work a lot like the batteries you use at home, only instead of using our batteries to power a torch or TV remote, we operate large, 'grid scale' batteries. This means we can rely more on renewable energy and less on expensive fossil fuels to provide electricity to thousands of homes and businesses.

Batteries are also very good at keeping the grid stable, by maintaining a constant and predictable supply of electricity to the grid, at the right frequency.

Changes in the supply and demand of electricity on the network create changes in this electrical frequency. This needs to be closely monitored, as if frequency is too high or too low, the network cannot operate properly. Field Corriemoillie will help to keep this frequency at the right level, which in turn helps reduce the chances of network disruptions or blackouts.

Home

Proposal

Public Consultation

FAQs

Documents

About us

Contact

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Privacy Policy

# **Proposal Page**



Field Corriemoillie will be made up of the following components:

Battery energy storage units, which will be used to store the energy from the grid.

Power conversion systems (including inverters and transformers), which convert energy from alternating current to direct current, so that it can be stored by the batteries. An on-site substation, which either steps up or steps down the voltage of the energy being

An underground cable connection to connect the battery to the existing Corriemoillie substation.

Site access tracks to allow vehicles (including emergency vehicles) to safely get around the site. Drainage arrangements to allow surface water to drain from the site at the same rate as the existing fields. Site security, including CCTV, fencing and lighting.

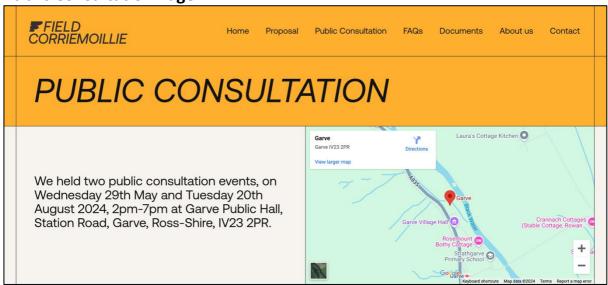
Landscaping to reduce visual impacts and contribute to biodiversity enhancement.





# Our batteries will provide huge benefits to the UK, and we take great care to Working with local make sure this is not to the detriment of the communities that host them. communities As a responsible developer and operator, listening to local communities matters to us, as it allows us to understand and respond to local issues, and ultimately build better battery sites. We engage early with communities throughout the development process, oversee the construction on-site and we're responsible for the project once it's in operation. We're part of communities for the long-term. Home Proposal **Public Consultation FAQs** Documents About us Contact Copyright 2024, Field Corriemoillie Ltd T/A Field (CN: 15258085) www.field.energy Privacy Policy

# **Public Consultation Page**



# **FAQs Page**



- When will Field Corriemoillie be built?

We will be submitting our planning application to the Energy Consents Unit in Autumn 2024. If we are granted consent, we would look to start construction in 2027 and it will take about two years to complete.

- How will our local community benefit?

We're currently working with the National Schools Partnership\* to deliver a community-based programme in local schools to help educate students about the work that Field is undertaking in renewable energy and energy storage, as well as encouraging and equipping young people to explore careers in STEM and renewable energy. The Field team will work with local schools to provide information to students about how to build a career in the renewable energy sector.

\*National Schools Partnership is a unique education network (run by the Brand and Social Impact Agency, We Are Futures) providing free teaching resources to schools across the whole of the UK.

- Will the project impact local traffic?

Once operational, the Project will have minimal impact on local traffic, with only occasional visits required for maintenance. When the battery is being built, construction traffic is managed through a Construction Traffic Management Plan. This will include details of construction traffic numbers, vehicle routing and working hours. As with all aspects of the development, we welcome input from the local community to help reduce any impact on local roads where possible.

Are battery energy storage sites noisy?

The main noise associated with batteries are the cooling fans, which keep the batteries from overheating. This noise level is low and the batteries are not expected to be audible beyond the site boundary. Noise is measured against existing background noise levels and noise levels are required to meet the relevant British Standards and World Health Organisation Noise Guidelines.

We conduct thorough noise evaluations for each site and implement various noise mitigation measures in our project plans. These measures, such as acoustic fencing, ensure that noise impacts are acceptable at nearby sensitive locations.

- Are the batteries safe and what safety measures will you put in place?

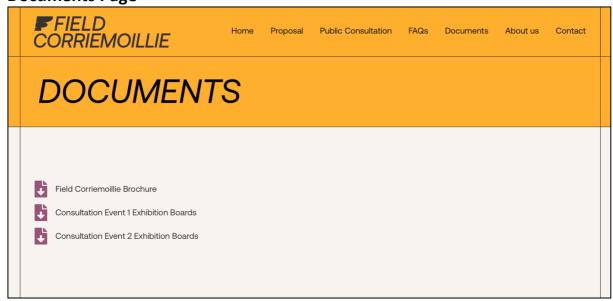
Large batteries are safe facilities. We work hard throughout site design, construction and into operation to ensure the safety of our sites. We would only use batteries that have best-in-class fire safety performance and will be compliant with all relevant fire safety standards.

The batteries will be constantly monitored and in the unlikely event that a fire does occur, the facility will employ automatic fire detection and suppression systems

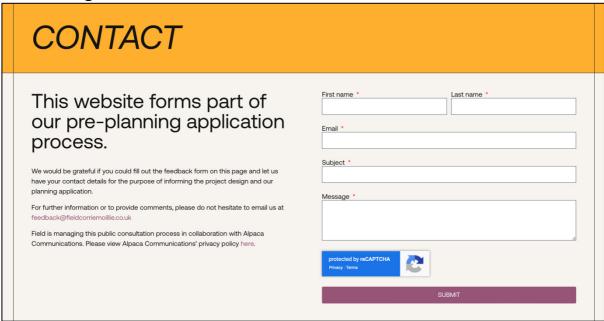
We are also working with the Scottish Fire and Rescue Service to ensure suitable emergency response procedures are in place, including a Battery Fire Safety Management Plan.

To keep our sites secure, all our projects include perimeter fencing and gated access. During operation, our sites are unmanned and CCTV is used to monitor activities

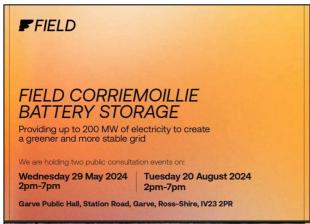
# **Documents Page**



# **Contact Page**



# **Appendix 4: Local Resident invite brochure**





# WHAT ARE WE PROPOSING TO BUILD AND OPERATE?

# WORKING WITH LOCAL COMMUNITIES



### WHY DO WE NEED **BIG BATTERIES?**

Our batteries are designed to fill gaps in the UK's electricity supply by charging up when renewable energy is being produced (such as on windy or sunny days) and discharging energy back into the grid when resided (e.g. when the wind snt blowing, the sun insi in hing, or we arent able to import enough energy from elsewhere). This ensures plenty of energy is available for people to make their morning cupps, even on a calm, overceal whater's down.

These batteries work a lot like the batteries you use at home, only instead of using our batteries to power a torch or TV remote, we operate large, 'grid scale' batteries. This means we can rely more on renewable energy and less on expensive fossil fuels to provide electricity to thousands of homes and husinesses.

Batteries are also very good at keeping the grid stable, by maintaining a constant and predictable supply of electricity to the grid, at the right frequency.

Changes in the supply and demand of electricity on the network create changes in this electrical frequency. This needs to be closely monitored, as if frequency is too high or too low, the network cannot operate properly. Field Corinnollie will help to keep this frequency at the right level, which in turn helps reduce the chances of network disruptions or blackouts.

### STORING ENERGY IN THE HIGHLANDS

Batteries are a vital part of how we can make the most of renewable energy, which is why we believe that they can play a part in Highland Council's "Future Highland" Programme. The Highland Council stated in their Net Zero Strategy (2023) that

"The Council's "Future Highland" Programme sets out a vision of Highland, a centre for global renewable energy, by capitalising on our areas of immense natural capital to deliver alternative energy solutions including developing solar, hydrogen, Hydro, wind and wave solutions."

# **FIELD CORRIEMOILLIE**

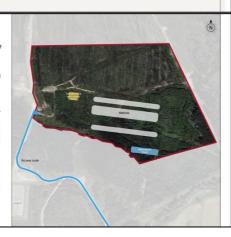
Field Corriemolille would be located approximately 200m to the north-east of the existing Corriemolille substation, cornecting to the substation with an underground cable. The built infrastructure (batteries, cables, access tracks etc.) is proposed to cover an are of approximately 9 hectares.

We'll also provide landscaping to reduce visual impacts and biodiversity enhancements so that we are having a positive ecological effect on the land we use.

Field Corriemoillie will be made up of the following components:

- Battery energy storage units, which will be used to store the energy from the grid.

- An on-site substation, which either steps up or steps down the voltage of the energy being stored.
- An underground cable connection to connect the battery to the existing Corriemoillie substation.
- Site access tracks to allow vehicles (including emergency vehicles) to safely get around the site.



# **FREQUENTLY** ASKED QUESTIONS

What makes Field a committed and responsible developer for the long

Field is a developer/owner/operator, which means we are responsible for the project throughout its entire lifecycle. This differentiates us from many developers who lots take the project to shovel-neady status—that's securing lead, grid connection and planning permission, and then sell the project on.

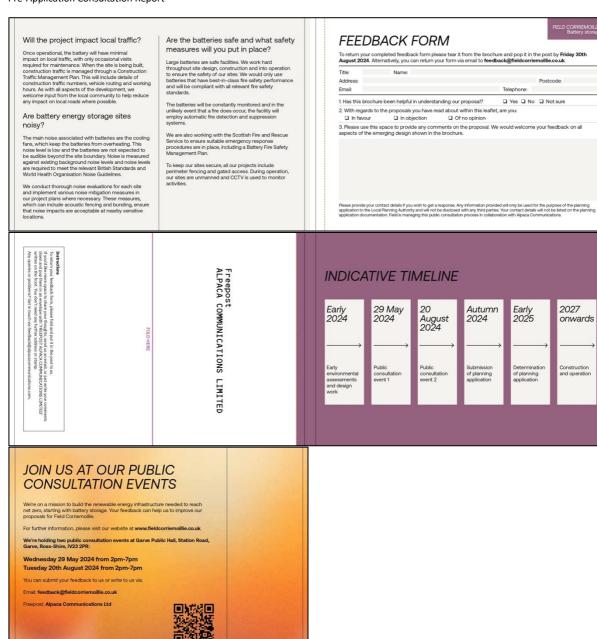
## When will Field Corriemoillie be built?

We will be submitting our planning application to the Energy Consents Unit in Autumn 2024. If we are granted consent, we would look to start construction in 2027 and it will take about two years to complete.

#### How will our local community benefit?

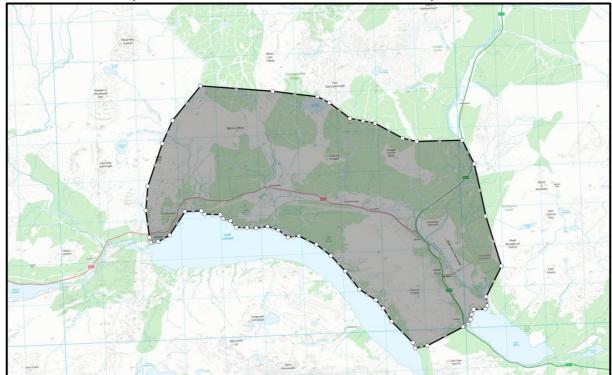
We're currently working with the National Schools Partnership' to deliver a community-based programme in local schools to help educate shuderts about the work that Field is undertaking in renewable energy and energy storage, as well is encouraging and equipping young young the second of the second of the second of the programme of the second of the second of the programme of the second of the programme of the information to students about how to build a career in the renewable energy sector.

"National Schools Partnership is a unique education network (run by the Brand and Social Impact Agency, We Are Futures) providing free teaching resources to schools across the whole of the UK.



# Appendix 5: Local resident invite brochure distribution area

The brochure for the public consultation event was sent out on 21st May 2024 to 134 addresses.



# **Appendix 6: Public consultation event adverts**



Field Corriemoillie Ltd (Field) is preparing to submit a planning application to the Highland Council for a Battery Energy Storage System site on land north of the A832 and north-east of Corriemoillie Substation, IV23 2PY.

The battery would provide up We will be accepting preto 200 MW of electricity to create a greener and more comments ur stable grid. This is expected August 2024. to avoid up to 1.4 million to avoid up to 1.4 million tonnes of CO<sub>2</sub>e emissions during the first 20 years of operation.

Comments made to Field are not representations to the Scottish Ministers. If the

Please visit www. fieldcorriemoillie.co.uk where we will provide updates on this project. For further information, please do not hesitate to email the project team at feedback@ fieldcorriemoillie.co.uk.

application submission comments until Friday 30th

Applicant submits a planning application there will be an opportunity for consultees to make representations on the application to the Scottish

Join us at our first public consultation event on Wednesday 29th May 2024 | 2pm-7pm Garve Public Hall, Station Road, Garve, Ross-Shire, IV23 2PR

Advert posted in the *Inverness Courier* on the 21st May 2024.



Field Corriemoillie Ltd (Field) is preparing to submit a planning application to the Highland Council for a Battery Energy Storage System site on land north of the A832 and north-east of Corriemoillie Substation, IV23 2PY

The battery would provide up to 200 MW of electricity to create a greener and more stable grid. This is expected to avoid up to 1.4 million tonnes of CO<sub>2</sub>e emissions during the first 20 years of the Scottish Ministers. If the Applicant submits a planning

Please visit www. fieldcorriemoillie.co.uk where we will provide updates on this project. For further information, please do not hesitate to email the project team at feedback@fieldcorriemoillie.co.uk.

We will be accepting preapplication submission comments until Friday 30th August 2024.

Applicant submits a planning application there will be an opportunity for consultees to make representations on the application to the Scottish

Join us at our public consultation events on

Tuesday 20th August | 2pm-7pm

Garve Public Hall, Station Road, Garve, Ross-Shire, IV23 2PR

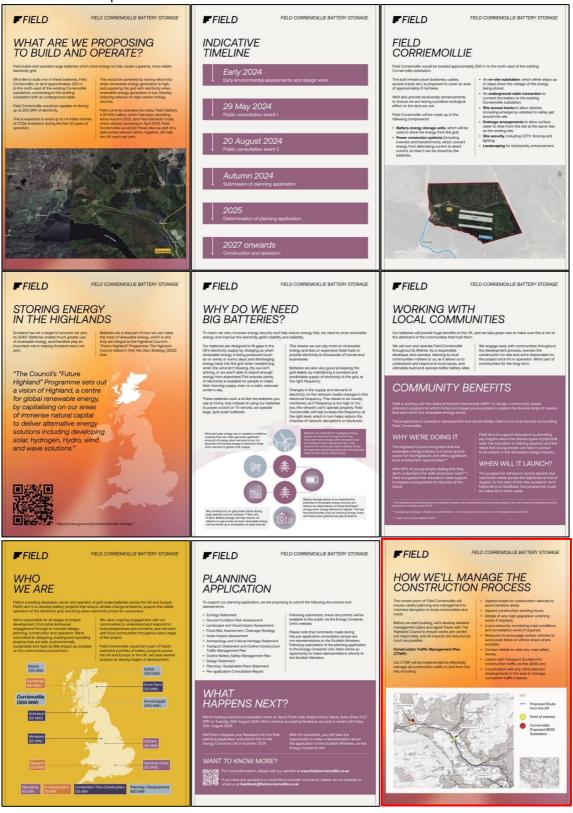
Advert posted in the Inverness Courier on the 13th August 2024.

# **Appendix 7: First consultation event boards**



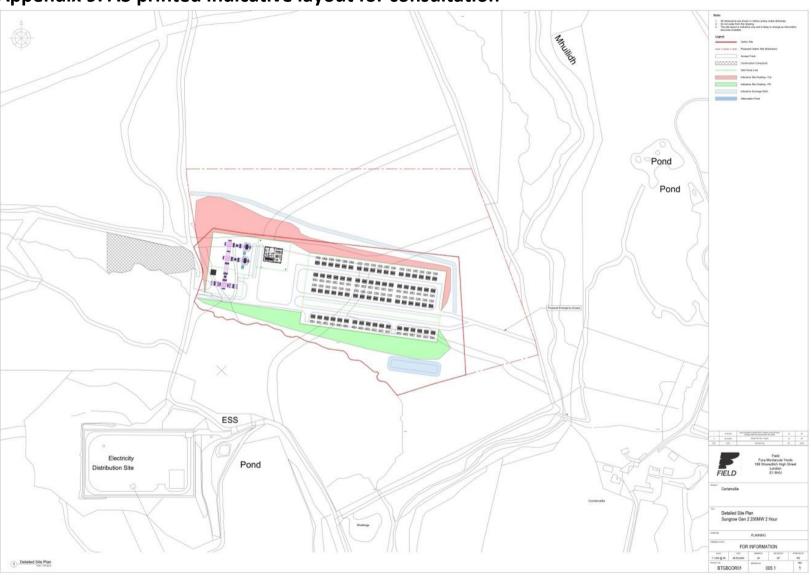
# **Appendix 8: Second consultation event boards**

Additional boards produced for the second consultation event have been outlined in red.





# **Appendix 9: A3 printed indicative layout for consultation**



# **Appendix 10: Comments received via feedback form and Applicant's response**

esponse	
COMMENTS RECEIVED	FIELD'S RESPONSE
I object to a lithium bomb being installed in a beautiful scenic area. Especially to serve the green propaganda machine of the elitist hypocrites. Install it in the English cities it is going to service.	Battery storage in the Highlands Scotland has set a target to become net zero by 2045 Batteries enable much greater use of renewable energy and therefore play an important role in helping Scotland reach net zero.
	Batteries are a vital part of how we can make the mos of renewable energy, which is why they are integral to the Highland Council's "Future Highland" Programme.
	Battery safety Field takes a comprehensive approach to fire risk management through careful design, operating procedures, and emergency planning.
	Field is an industry leader in relation to fire safety Workstreams undertaken by Field in relation to BESS fire safety include: sitting on government working groups to help define BESS fire safety standards, working closely with suppliers to understand the latest BESS safety features and fire safety testing and engaging with loca fire and rescue services.
	Field has prepared an Outline Battery Safety Management Plan (OBSMP) to accompany the planning application. The OBSMP provides full details on Field's approach to battery safety management, including identifying all potential safety risks that may arise from the Proposed Development as well as the proposed measures in place to avoid and mitigate risks. These include consideration of risks relating to, but not limited to, fire events, site security and emergency access.
This BESS on a shoestring will expose the community to the risk of fire and toxic fumes, all for greed. Destruction of habitat for money - Jessie will be turning in her grave.	Battery safety Field takes a comprehensive approach to fire risk management through careful design, operating procedures, and emergency planning.
miner grave.	Field is an industry leader in relation to fire safety Workstreams undertaken by Field in relation to BESS fire safety include: sitting on government working groups to help define BESS fire safety standards, working closely with suppliers to understand the latest BESS safety features and fire safety testing and engaging with loca fire and rescue services.
	Field has prepared an Outline Battery Safet

November 2024 36

Management Plan (OBSMP) to accompany the planning

application. The OBSMP provides full details on Field's approach to battery safety management, including identifying all potential safety risks that may arise from the Proposed Development as well as the proposed measures in place to avoid and mitigate risks. These include consideration of risks relating to, but not limited to, fire events, site security and emergency access.

## **Ecological surveys and biodiversity**

We have conducted full ecological surveys to identify any potential ecological impacts. The Proposed Development has been designed to utilise existing landform and commercial forestry along the southern boundaries of the Site, to minimise views of the Proposed Development from sensitive landscape and visual receptors within the surrounding area. In addition to this, further screening is included within the submitted Landscaping Plan, to further minimise adverse landscape and visual impacts.

A robust Landscape and Visual Appraisal (LVA) has been undertaken to ensure the Proposed Development is compliant with national and local planning policy in relation to landscape and visual impacts.

The Landscaping Plan has been appropriately designed to use native woodland and heathland species to compliment the existing ecological baseline. This includes the creation and retention of wet heathland habitats and native scrub woodland onsite, ultimately resulting in a biodiversity net gain of greater than 10% for the Proposed Development.

I am writing with my feedback on behalf of 5 residents of Corriemoillie Lodge, IV23 2PY, an historic former shooting lodge less than 1/2 mile from your proposed site. Your brochure has "suggested" your proposal but is severely lacking in information about actual site size, number and size of battery containers, health and safety measures etc.. so our answer is NO We are SERIOUSLY OPPOSED to this development

**Comments**: Potentially very hazardous installation to have within a small community and very close to our property with children

Thermal runaway risk of major uncontrollable lithium-ion fires

#### **Battery Safety**

Field takes a comprehensive approach to fire risk management through careful design, operating procedures, and emergency planning.

Field is an industry leader in relation to fire safety. Workstreams undertaken by Field in relation to BESS fire safety include: sitting on government working groups to help define BESS fire safety standards, working closely with suppliers to understand the latest BESS safety features and fire safety testing and engaging with local fire and rescue services.

Field has prepared an Outline Battery Safety Management Plan (OBSMP) to accompany the planning application. The OBSMP provides full details on Field's approach to battery safety management, including identifying all potential safety risks that may arise from the Proposed Development as well as the proposed

Fires can't be controlled and have to burn themselves out and can re-ignite days later

Forest / hillside location potential spreading wild fires No mains water to help tackle / contain a blaze – irresponsible site choice

How will water be contained to prevent water course chemical contamination? Toxic fumes blowing west to local properties including ours!

At your consultation you said your batteries would NOT go on fire - you CANNOT say this for sure! You said you don't even know the source of your batteries yet!

Chemical seepage and soil contamination Noise Visual impact to ever growing industrialisation of this beautiful area Emerging technology with little knowledge of true impact

Eyesore on landscape This proposal by energy traders is purely for profit, not for climate change, net zero targets or for any benefit to the local people affected.

Poor quality promotional material, website and consultation reflects a low cost driven company which is very worrying for such a potentially dangerous installation. Company with no history or experience of BESS installations and with an extremely poor track record financially.

Questions: Please confirm the exact size of the site, (9 hectares?) the number of battery containers (40?) and the size of these containers (40ft x 3m high?)

Has the land for this development been bought outright or leased? and if the latter, for how many years?

At the consultation you said there would be no attempt to put out a fire if one should take place - is this still the case? measures in place to avoid and mitigate risks. These include consideration of risks relating to, but not limited to, fire events, site security and emergency access.

#### Visual Impact

Field has carefully considered potential visual impact. The proposal also includes a Landscaping Plan to demonstrate how the development will be effectively screened. The Landscaping Plan has been appropriately designed to use native woodland and heathland species to compliment the existing ecological baseline. This includes the creation and retention of wet heathland habitats and native scrub woodland onsite, ultimately resulting in a biodiversity net gain of greater than 10% for the Proposed Development.

The Proposed Development has been designed to utilise existing landform and commercial forestry along the southern boundaries of the Site, to minimise views of the Proposed Development from sensitive landscape and visual receptors within the surrounding area. In addition to this, further screening is included within the submitted Landscaping Plan, to further minimise adverse landscape and visual impacts. A robust Landscape and Visual Impact Assessment (LVIA) has been completed to ensure the Proposed Development is compliant with national and local planning policy in relation to landscape and visual impacts.

# Field's experience

Field is a leading developer, owner and operator of gridscale batteries across the UK and Europe. Field's aim is to develop battery projects that reduce climate change emissions, support the stable operation of the electricity grid, and bring down electricity prices for consumers.

Field currently has 13 BESS projects: 2 in operation, 6 in planning and 3 in construction.

Field is committed to maintaining high standards across all aspects of the project, including safety, quality, and community engagement, regardless of cost.

### Response to questions:

The size of the Proposed Development is approximately 9 ha, however the built infrastructure will be less than this. We are proposing 128 battery storage units, arranged in pairs. The approximate dimensions of each battery storage unit is 6.1m x 2.9m x 2.4m high.

What H&S measures are you planning to contain contamination of air, land and waterways?

The land for the proposed BESS is subject to a 40 year lease.

Fire and safety concerns have been addressed earlier in our response. The Proposed Development will comply with all relevant planning and environmental legislation to prevent contamination of air, land and waterways. This includes potential construction impacts, whereby the Proposed Development would be subject to a Construction Environment Management Plan to prevent impacts on the surrounding environment throughout the construction period.