Field Rigifa Battery Energy Storage System

PRE-APPLICATION CONSULTATION REPORT

on behalf of Field Rigifa Ltd

Prepared by Alpaca Communications | September 2024

Contents

1. Introduction

1.1 This Pre-Application Consultation (PAC) Report sets out how Field Rigifa Ltd ("Field") conducted a programme of public consultation stakeholder engagement with regards to its proposal for a battery energy storage system (BESS) and associated infrastructure ("the Proposed Development") on land to the south of the planned Gills Bay 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).

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 13 June 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 by the Town and Country Planning (Scotland) Act 1997 (TCPA) and the Town and Country Planning (Pre-Application Consultation) (Scotland) Regulations 2021. The Highland Council (THC) nevertheless recommends that applicants follow the TCPA PAN process 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.

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 Mey Village Hall, Castle Entrance, Caithness from 2pm-7pm on Tuesday 25th June 2024 and Thursday 22nd 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 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. 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 Rigifa's website and in a local newspaper notice of each event at least seven days beforehand, and which contains the following:
    - a description of, and the location of, the proposed development.
    - details as to where further information may be obtained concerning the proposed development.
    - the date and place of the public event.
    - 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

2.3. 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 south of the planned Gills Bay Substation. The site location can be found below in Figure 1.

3.2 The Proposed Development principally comprises the construction and operation of a battery energy storage system (BESS) with a capacity of up to 200 megawatts (MW). The Proposed Development would charge and discharge from the electricity transmission network via the adjacent, planned Gills Bay Substation.

3.3 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 comprising:
    - Individual battery storage units arranged into rows / strings.
    - Medium voltage (MV) skids (i.e. one MV skid per battery string), each of which houses two power conversion system (PCS) units and one MV transformer.
    - Ancillary infrastructure including low voltage (LV) cabinets, auxiliary transformers and underground ducting and cabling.
- A high voltage (HV) substation compound comprising:
    - Two HV grid transformers
    - Auxiliary transformers and LV distribution infrastructure
    - An on-site substation building, comprising a control room, HV switch room and welfare facilities.
- An interface substation between the batteries and the Gills Bay substation site.
- An underground 132 kV grid connection cable between the HV substation and the planned Gills Bay substation, via the interface substation.
- 3-metre-high palisade security fencing around the site.
- Cut and fill / earthworks and foundational civil structures to create level compounds upon which the batteries, substation and other ancillary structures will be located.
- Access arrangements, including two site access points along the site's eastern boundary, parking spaces and 5-metre-wide internal access tracks throughout the site.
- CCTV and lighting columns across the site.
- Drainage infrastructure, including an attenuation basin.
- Landscape and biodiversity mitigation and enhancement measures.

Figure 1: Site location Plan

4. Public Consultation

Consultation Aims

4.1 The aims of the consultation were as follows:

- To work with 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 stakeholders to agree topic areas and the associated scopes and methodologies of assessments;
- To ensure the local community and stakeholders had the opportunity to give feedback on the proposals;
- 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

4.2 On 15th May 2024, Field engaged with The Highland Council (THC) via their Pre-Application Advice Service for Major Developments. This included a 1.5 hour meeting which comprised an introduction to the Proposed Development, an overview of the assessments and underpinning methodologies proposed to support the planning application, and an opportunity for THC to ask questions and provide initial advice.

4.3 Public consultation began on 12th June 2024 when Field contacted relevant local stakeholders (**Appendix 1**), notifying them about the Proposed Development including the offer of a briefing.

4.4 Field submitted a PAN for the Proposed Development to The Highland Council on 13th June 2024 (**Appendix 2**).

4.5 Field engaged with the site and neighbouring community councils (CCs): Dunnet and Canisbay CC, Sinclair's Bay CC and Bower CC with an invitation to the events, a copy of the brochure, and to offer a meeting.

4.6 Field also engaged with the local Caithness, Sutherland and Easter Ross MP Jamie Stone, 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.

4.7 Alongside the community councils and local MPs and MSPs (including regional list), Field contacted site ward councillors (Wick and East Caithness) and neighbouring ward councillors (Thurso and Northwest Caithness) councillors on 12 June, again with a copy of the brochure, invitation to the public consultation events, and an offer of a personal briefing (**Appendix 1**). Cllr Matthew Reiss, Douglas Ross MSP and Ariane Burgess MSP all responded to inform that they could not attend.

4.8 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**).

4.9 A website for the Proposed Development (**Appendix 3**) was created, which can be accessed at the following address: www.fieldrigifa.co.uk. 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.

4.10 A brochure and invite (**Appendix 4**) were sent out on 12th of June to 420 addresses (see **Appendix 5** for postal distribution area). The 420 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 Mey Village Hall, Castle Entrance, Caithness from 2pm-7pm on Tuesday 25th June 2024 and Thursday 22nd August 2024.

4.11 Field advertised the public consultation events in a local newspaper (**Appendix 6**). The first public consultation event was advertised in the *John O'Groats Journal on* June 14th, 2024 and the second public consultation event was advertised in the *John O'Groats Journal* on the 9th of August 2024.

4.12 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

4.13 The first public consultation event was held at Mey Village Hall, Castle Entrance, Caithness from 2pm-7pm on Tuesday 25th June 2024. 13 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**).

4.14 The first consultation event was scheduled to take place early in the development programme, ahead of Field completing technical assessments for the Proposed Development and in advance of Field having defined a fixed layout so that stakeholders could have a meaningful input into the design.

4.15 Figure 2 below shows a copy of the simple layout which was presented on the information boards. A detailed layout plan was also presented for discussion in A3 printed format.

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

4.16 A total of 8 people attended the first consultation event.

4.17 The feedback at the first consultation event can be summarised as follows:

- Positive feedback regarding the important role BESS plays in supporting renewable energy infrastructure;
- Concerns regarding trees at the 'West Lodge' located north-west of the Gills Bay substation; and
- Concerns about safety and fire risk.

Second Public Consultation Event

4.18 The second public consultation event was held at Mey Village Hall, Castle Entrance, Caithness from 2pm-7pm on Thursday 22nd August 2024

4.19 All political stakeholders (**Appendix 1**) were contacted again on 9th August to invite them to the second consultation event. Cllr Matthew Reiss responded to inform that he would not be attending, as he is a member of the Planning Committee.

4.20 At the second event, the board outlining the details of the Proposed Development was replaced with the latest design. The consultation board also included a summary of the changes that had been made to the design following the progression of environmental studies and based on feedback from stakeholders including The Highland Council.

4.21 An additional two consultation boards were also produced to provide information regarding Field's other sites across Scotland and the UK.

4.22 A total of 5 people attended the second consultation event.

4.23 The feedback at the second consultation event can be summarised as follows:

- Positive feedback regarding the important role BESS plays in supporting renewable energy infrastructure;
- Interest in how BESS works; and
- Concerns about safety and fire risk.

Consultation Feedback

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

4.25 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
4	0	0

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

IN FAVOUR	IN OBJECTION	OF NO OPINION
3	1	0

Question 3: Additional comments

4.26 Question 3 requested any additional comments. All four feedback forms contained additional comments. **Appendix 9** contains those comments in full, in addition to Field's response.

4.27 Overall feedback was largely positive with three of the four respondents in support to the proposals. The only opposition revolved around the felling of trees near the 'West Lodge'; as explained below no tree felling is being undertaken by Field. There were also some concerns around battery safety.

4.28 Feedback received during the consultation process for the Proposed Development has provided Field with an understanding of the key concerns of 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**
Trees being felled next to the West Lodge.	Field is not felling any trees (including those at West Lodge) as part of the Proposed Development. It is understood that the plantation trees will be removed to facilitate the construction of SSE's Gills Bay substation. The trees are then proposed to be replaced with a permanent woodland in accordance with SSE's approved landscaping plan (21/05536/FUL). All works in the vicinity of West Lodge are in relation to SSE's proposed works. Whilst the Proposed Development will connect into the Gills Bay substation, this is an entirely separate scheme and consent being brought forward by SSE.
Concern over lack of information regarding battery safety	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 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.

Figure 3: Final Site Layout Plan

5. Other Stakeholder 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	Field's Response
The Highland Council, Planning	On 15 May 2024, the Applicant engaged with The Highland Council (THC) via their Pre-Application Advice Service for Major Developments. This included a 1.5 hour meeting which comprised an introduction to the Proposed Development, an overview of the assessments and underpinning methodologies proposed to support the planning application, and an opportunity for THC to ask questions and provide initial advice. On 12 June 2024, THC provided written pre-application advice which summarised the key issues and information required to be considered and supplied as part of the final planning application to the ECU. The written advice included inputs from various internal departments within THC and external bodies including Scottish Environmental Protection Agency (SEPA), NatureScot and Historic Environment Scotland (HES).	All technical assessments and planning drawings have been informed by the feedback received in THC's pre-application advice relating to planning and environmental considerations and information requirements.
The Highland Council, Environmental Health Officer (North)	On 8 February 2024, the Applicant engaged with the relevant Environmental Health Officer (EHO) at THC in relation to potential noise impacts associated with the Proposed Development. This included a letter outlining the Applicant's proposed noise assessment methodology. On 13 February 2024, the EHO confirmed that the noise assessment methodology is acceptable and recommended further discussion once background sound levels were established. On 2 August 2024, the Applicant re-engaged with the EHO to share background sound levels and confirm the Applicant's approach to cumulative impacts. On 9 August 2024, the EHO confirmed that the background sound levels and proposed methodology are acceptable, and this advice has informed the preparation of the submitted noise impact assessment.	The submitted Noise Impact Assessment (TNEI, September 2024) has been informed by the feedback received by THC's EHO regarding the proposed noise assessment methodology and information requirements.
The Highland Council, Transport Planning	On 7 March 2024, the Applicant engaged with THC's Transport Planning team to introduce the Proposed Development and the proposed approach to site access, and seek advice	The Transport Statement and OCTMP (RHDHV, September 2024), site access design and the

Consultee	Summary	Field's Response
	regarding potential transport issues application requirements. During the meeting, THC advised about preferred transportation routes and information requirements for the Outline Construction Traffic Management Plan (OCTMP). This consultation has informed the preparation of the submitted transport statement and OCTMP.	selected transportation routes has been informed by the advice received by THC's Transport Planning team.
The Highland Council, Landscape Officer	On 7 August 2024, the Applicant engaged with THC's Landscape Officer to confirm the methodology for the landscape and visual impact assessment, including relevant viewpoints and the extent of the study area. On 8 August 2024, THC's Landscape Officer confirmed that the proposed study area is acceptable and provided feedback on the proposed viewpoints. The advice received has informed the preparation of the landscape and visual impact assessment and supporting photomontages.	The Landscape and Visual Impact Assessment (Stephenson Halliday, September 2024), including the selected viewpoints, study area and assessment methodology has been informed by the advice received by THC's Landscape Officer.
Historic Environment Scotland (HES)	Based on initial advice received within THC's pre-application advice, further consultation was undertaken with HES in relation to potential impacts on the setting of the Castle of Mey. On 23 August 2024 and 6 September 2024, the Applicant provided HES with the zone of theoretical visibility (ZTV) and draft wirelines of the Proposed Development from the Castle of Mey. On 10 September 2024, HES confirmed that the Proposed Development would not have an adverse impact on the Castle of Mey and its associated inventory garden. This advice has been reflected within the supporting archaeological desk-based assessment.	The Archaeological Desk-Based Assessment (RHDHV, September 2024), including the study area and the consideration of the nearby Castle of Mey was informed by HES' feedback. HES' written confirmation that the Proposed Development would not have an adverse impact on the Castle of Mey has ensured that this potential impact was addressed at pre-application stage.
NatureScot	On 6 August 2024, the Applicant engaged with NatureScot to confirm their approach to potential impacts associated with wintering birds, breeding birds and groundwater dependent terrestrial ecosystems (GWDTE). On 4 September 2024, NatureScot confirmed that the approach to wintering birds and breeding birds is acceptable to inform the planning application. No advice was provided regarding GWDTE, which has been informed instead by consultation with SEPA.	The Ecological Impact Assessment (RHDHV, September 2024) and Shadow Habitats Regulations Assessment (RHDHV, September 2024) has been informed by feedback received by NatureScot as part of THC's written advice. This included the carrying out of additional survey work

Consultee	Summary	Field's Response
		and consultation to confirm the approach to wintering and breeding birds. The feedback received by NatureScot is reflected within the full application.
Scottish Environmental Protection Agency (SEPA)	Based on initial advice received within THC's pre-application response, further consultation was undertaken with SEPA with respect to groundwater dependent terrestrial ecosystems (GWTDE). On 29 August 2024, the Applicant engaged with SEPA to confirm the methodology for the GWTDE assessment. On 13 September 2024, SEPA responded to confirm the proposed approach to assessing GWDTE.	The Ecological Impact Assessment (RHDHV, September 2024) has included an assessment of potential impacts on GWDTE and proposed mitigation measures based on the advice received by SEPA.

6. Design Changes Following Consultation

6.1. Over the course of the pre-application consultation period, Field has made several changes to the sited design as a result of stakeholder engagement, the progression of environmental studies and constructability requirements.

6.2. These changes have included:

- Refinement of the size and design of the proposed attenuation basin and the introduction of a swale at the interface substation following the progression of the flood risk assessment and drainage strategy and to provide additional biodiversity enhancements;
- Refinement of site access design following engagement with The Highland Council's transport team, including:
    - Selection of the eastern access point as the preferred access point;
    - Swept path analysis to ensure all oversized construction and emergency vehicles can access the site; and
    - Design of passing places along the eastern access road.
- Further design of the interface substation, including shifting its location slightly north-east to accommodate access requirements;
- Cut and fill design to inform constructability and create flat surfaces for the main site compounds;
- Landscape design including perimeter planting and the introduction of a 1.5 metre bund east of the substation compound, informed by landscape and visual impact analysis and biodiversity enhancement requirements; and
- Removal of 20 battery strings and 5 MV skids at the southern end of the BESS compound, resulting in a 0.5 ha reduction in the overall development footprint to accommodate additional area for biodiversity enhancements.

7. Conclusion

7.1. Overall feedback was largely positive with three of the four respondents stating that they are in favour of the Proposed Development. The one respondent opposed to the Proposed Development raised concerns about the felling of trees near the 'West Lodge', which is not being undertaken by Field. There were also some general concerns and questions about battery safety.

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. The final assessments will be available to the public following the submission of the planning application.

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 NatureScot, Historic Environment Scotland and Scottish Environmental Protection Agency.

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 (PoAN)
- **Appendix 3:** Field Rigifa website
- **Appendix 4:** Brochure sent to local residents
- **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**: Comments received via feedback form and Applicant's response

Appendix 1: List of Stakeholders contacted and copy of correspondence

Name	Position	Summary of response (if received)
Cllr Raymond Bremner	Leader of the Council	
Cllr Ken Gowans	Chair, Economy and Infrastructure Committee	
Cllr Karl Rosie	Chair, Climate Change Committee	
Cllr Andrew Jarvie	Site Ward Councillor (Wick and East Caithness)	
Cllr Willie Mackay	Site Ward Councillor (Wick and East Caithness)	
Cllr Jan McEwan	Site Ward Councillor (Wick and East Caithness)	
Cllr Ron Gunn	Neighbouring Ward Councillor (Thurso and Northwest Caithness)	
Cllr Matthew Reiss	Neighbouring Ward Councillor (Thurso and Northwest Caithness)	As a member of the North Planning Applications Committee it is probably best for me not to attend.
Cllr Struan Mackie	Neighbouring Ward Councillor (Thurso and Northwest Caithness)	
Jamie Stone	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)	I acknowledge receipt of your emails of 12th and 13th June on behalf of Tim Eagle MSP. Tim Eagle's colleague, Edward Mountain MSP, tends to focus on issues relating to Thurso, and I would be happy to forward on these emails to his office.
Ariane Burgess	Regional List MSP (Highlands and Islands)	Thank you for inviting Ariane to this consultation event. Unfortunately Ariane has committee on Tuesday 25th and therefore will not be able to attend.
Jamie Halcro Johnston	Regional List MSP (Highlands and Islands)	

Emma Roddick	Regional List MSP (Highlands and Islands)	
Dunnet and Canisbay Community Council	Site Community Council	
Sinclair's Bay Community Council	Neighbouring Community Council	

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

Dear XXXXXX,

I am contacting you by way of courtesy on behalf of Field regarding proposals for a battery energy storage system (Field Rigifa) on land to the south-west of the proposed Gills Bay Substation. This 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 would like to invite you to our first public consultation event on Tuesday 25th June, 2pm-7pm, at Mey Village Hall, Castle Entrance, Mey, Caithness, KW14 8XH**. This will provide the local community with an introduction to our proposals and give them the opportunity to ask any questions they may have. We will be holding a second event on **Thursday 22nd August 2024, 2pm-7pm**, also at Mey Village Hall. We will recirculate invitations to that event closer to the time.*

Please find attached a brochure with further information about our proposal and public consultation events, which was sent to local households. We also have a project website which may be accessed at www.fieldrigifa.co.uk.

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

The Highland Council
Comhairle na Gàidhealtachd

PROPOSAL OF APPLICATION NOTICE
MOLADH BRATH IARRTAIS

The Town and Country Planning (Scotland) Act 1997 as amended by the Planning Etc. (Scotland) Act 2006 and Planning (Scotland) Act 2019

Town and Country Planning (Pre-Application Consultation) (Scotland) Regulations 2021

The Council will respond within 21 days of validation the Notice. It will advise whether the proposed Pre-application Consultation is satisfactory or if additional notification and consultation above the statutory minimum is required.

Please note that a planning application for this proposed development cannot be submitted less than 12 weeks from the date the Proposal of Application Notice is received by the Council and without the statutory consultation requirements having been undertaken. The planning application must be accompanied by a Pre-application consultation report.

The Proposal of Application Notice will be valid for a period of 18 months from the date of validation of the notice by the Council.

Data Protection
Your personal data will be managed in compliance with the Data Protection legislation. You can read our privacy notice for planning related certificates on the Council's website at: https://www.highland.gov.uk/directory_record/1052173/planning_applications_consents_and_notice_of_review ☒I have read and understood the privacy notice.

Contact Details			
Applicant	Field Rigifa Limited	Agent	David Bell Planning Ltd
Address	c/o Agent	Address	[redacted]
Phone	c/o Agent	Phone	
Email	c/o Agent	Email	

Address or Location of Proposed Development
Land generally at Phillips Mains Farm Rigifa, Thurso KW14 8XH

Description of Development
Construction and operation of a Battery Energy Storage System (BESS) with a capacity of up to 200 MW with associated infrastructure (including interface substation and cable route to consented Gills Bay substation), access and ancillary works (including landscaping and biodiversity enhancement). (Section 36 application to Energy Consents Unit (ECU))

Pre-application Screening Notice	
Has a Screening Opinion been issued on the need for a Proposal of Application notice by the Highland Council in respect of the proposed development? If yes, please provide a copy of this Opinion.	
☐Yes	☒No

Community Consultation State which other parties have received a copy of this Proposal of Application Notice.	
Community Council/s	**Date Notice Served**
Dunnet and Canisbay Community Council [Neighbouring: Sinclairs Bay Community Council Castletown Community Council]	14 June 2024
Local Elected Members	**Date Notice Served**
Cllr Raymond Bremner Cllr Andrew Jarvie Cllr Willie Mackay Cllr Jan McEwan [Neighbouring: Cllr Ron Gunn Cllr Matthew Reiss Cllr Karl Rosie Cllr Struan Mackie]	14 June 2024
Members of Scottish Parliament and Members of Parliament	**Date Notice Served**
Jamie Stone MP Maree Todd MSP Douglas Ross MSP Edward Mountain MSP Rhoda Grant MSP Tim Eagle MSP Ariane Burgess MSP Jamie Halcro Johnston MSP Emma Roddick MSP	14 June 2024
Names / details of other parties	**Date Notice Served**

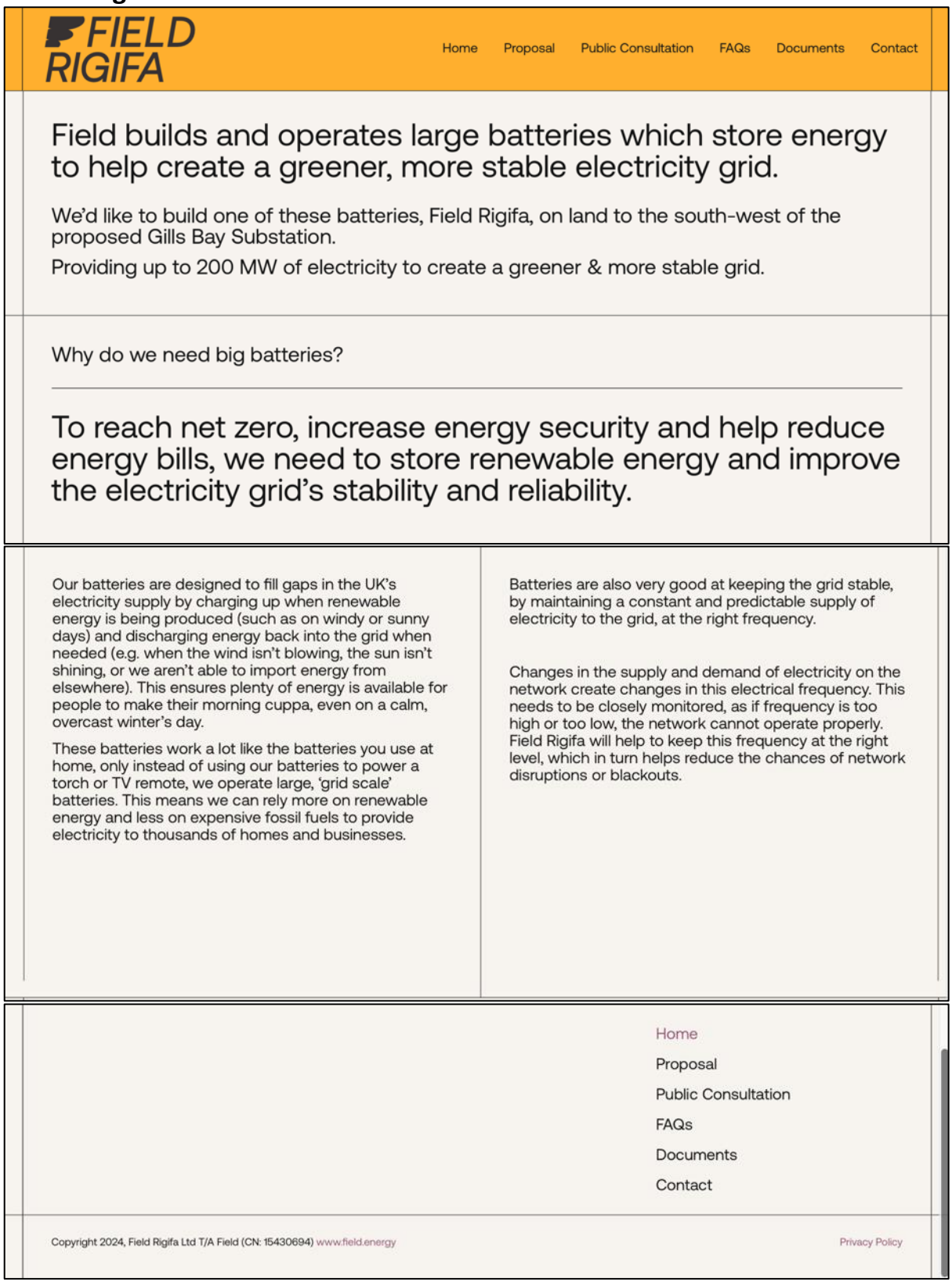
Details of Proposed Consultation		
Proposed Public Event 1	**Venue**	**Date and Time**
	Mey Village Hall Castle Entrance, Mey, Caithness KW14 8XH	14:00 - 19:00 25 June 2024
Proposed Public Event 2	**Venue**	**Date and Time**
(at least 14 days after Public Event 1)	Mey Village Hall Castle Entrance, Mey, Caithness KW14 8XH	14:00 - 19:00 22 August 2024

Publication of Event		
Newspaper Advert	**Name of Newspaper**	**Advert Date**
	John O'Groats Journal	Friday 14 June 2024
Details of any other consultation methods (date, time and with whom)		
• Delivery of consultation brochures to landowners within 2 km vicinity of the proposed site, including an invitation to public events (week commencing 17 June 2024) • Project website (https://fieldrigifa.co.uk) • Meetings with community council members or other political stakeholders upon request (dates to be confirmed with relevant stakeholders depending on availability).		

Signed	[redacted]	Date	14 June 2024

Appendix 3: Field Rigifa Website

Home Page



Proposal Page

FIELD RIGIFA

Home Proposal Public Consultation FAQs Documents Contact

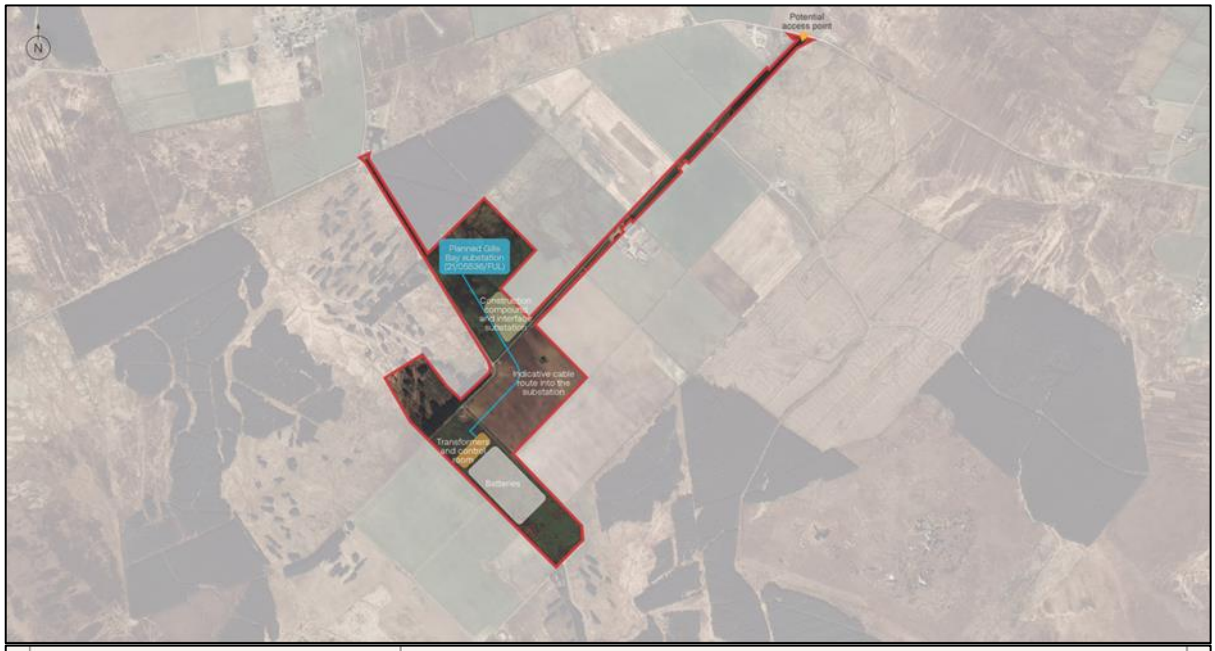
PROPOSAL

Field Rigifa would be located directly north-east of Gills Bay substation. The built infrastructure (batteries, cables, access tracks etc.) is proposed to cover an area of approximately 10 hectares.

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

Field Rigifa 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 stored.	An underground **cable connection** to connect the battery to the existing Knocknagael 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.



Working with local communities

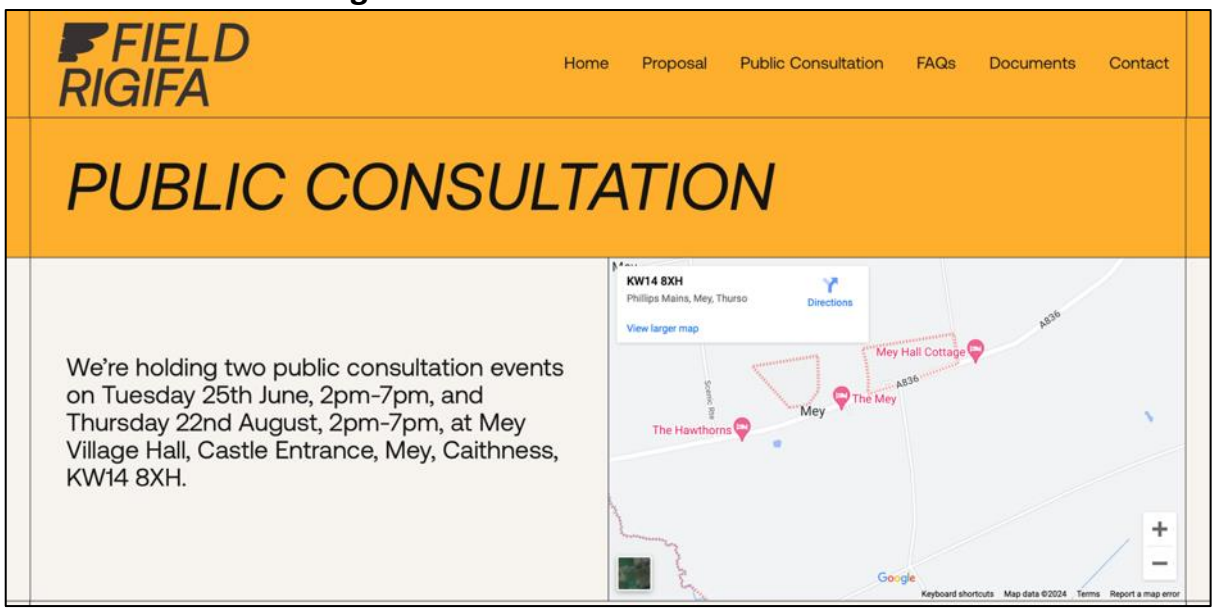
Our batteries will provide huge benefits to the UK, and we take great care to make sure this is not to the detriment of the communities that host them.

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.

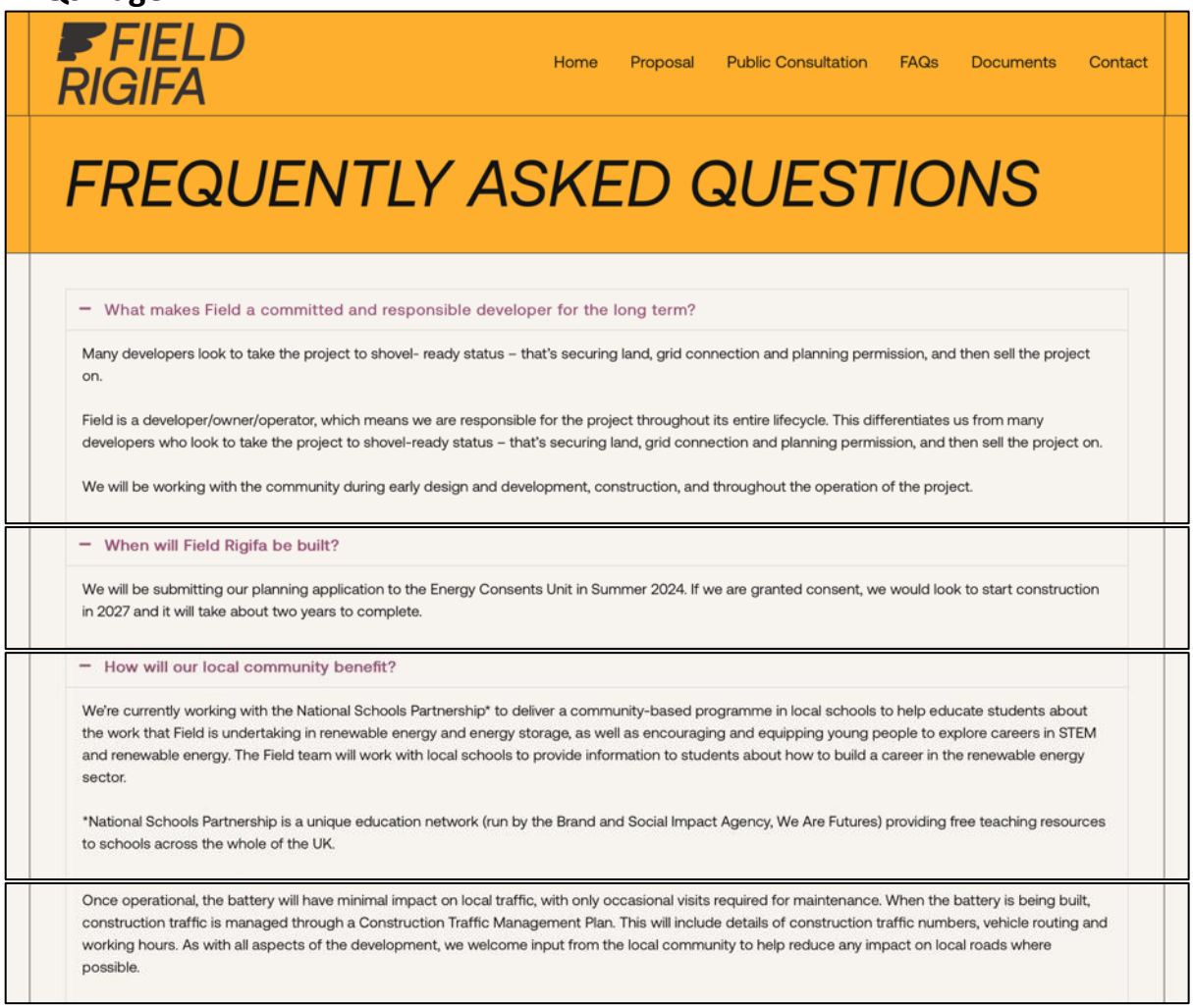
We engage early with communities throughout the development process, oversee the construction on-site and we're responsible for the project once it's in operation. We're part of communities for the long-term.

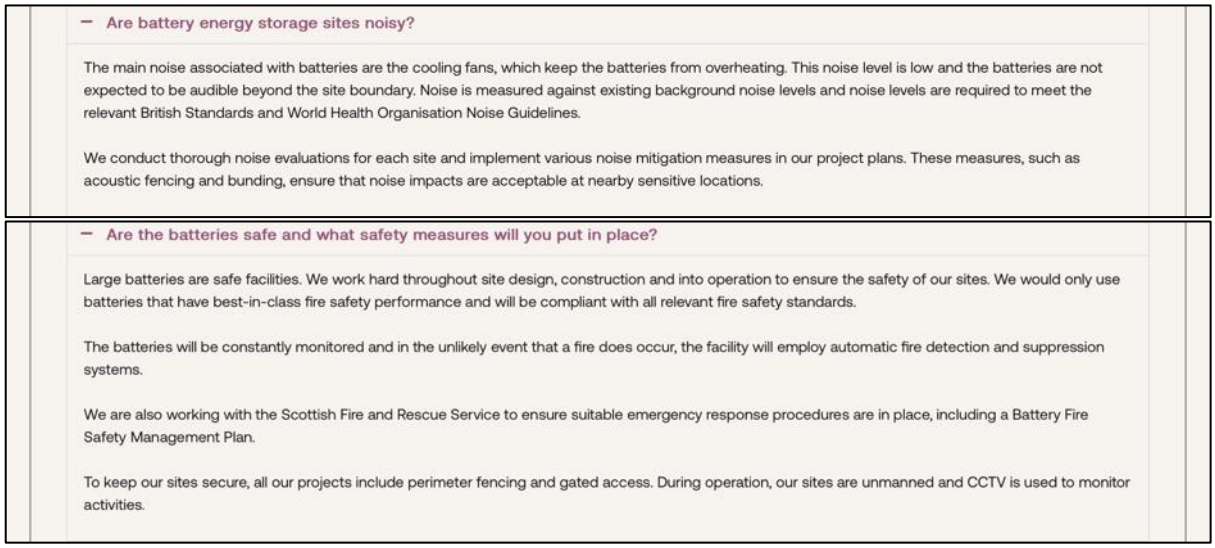
Home
Proposal
Public Consultation
FAQs
Documents
Contact

Public Consultation Page

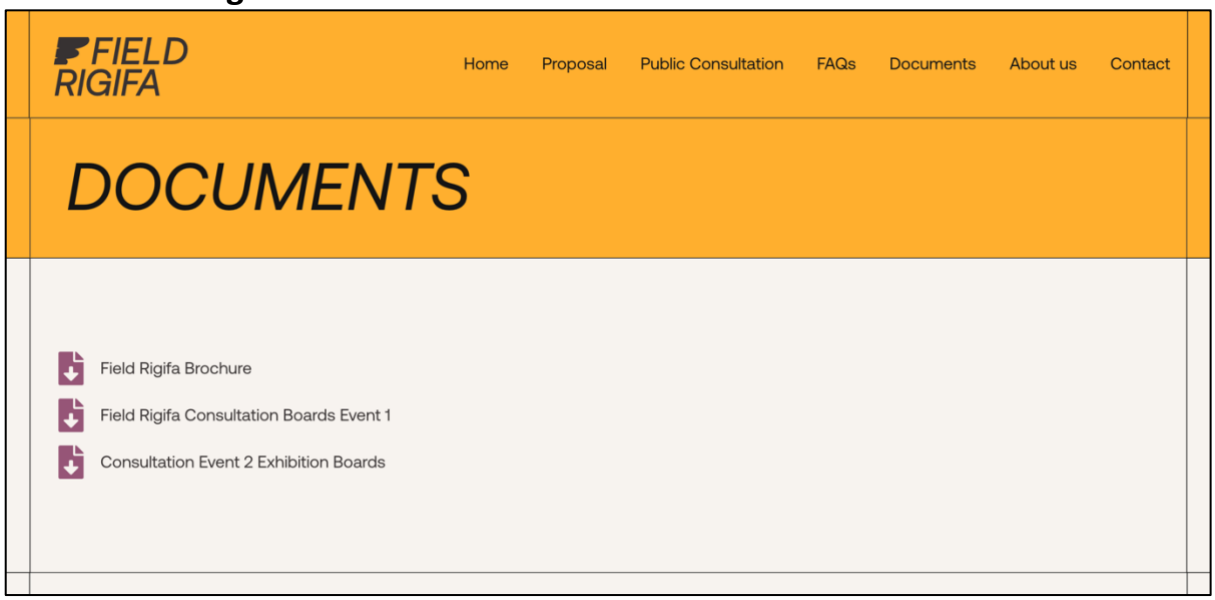


FAQs Page

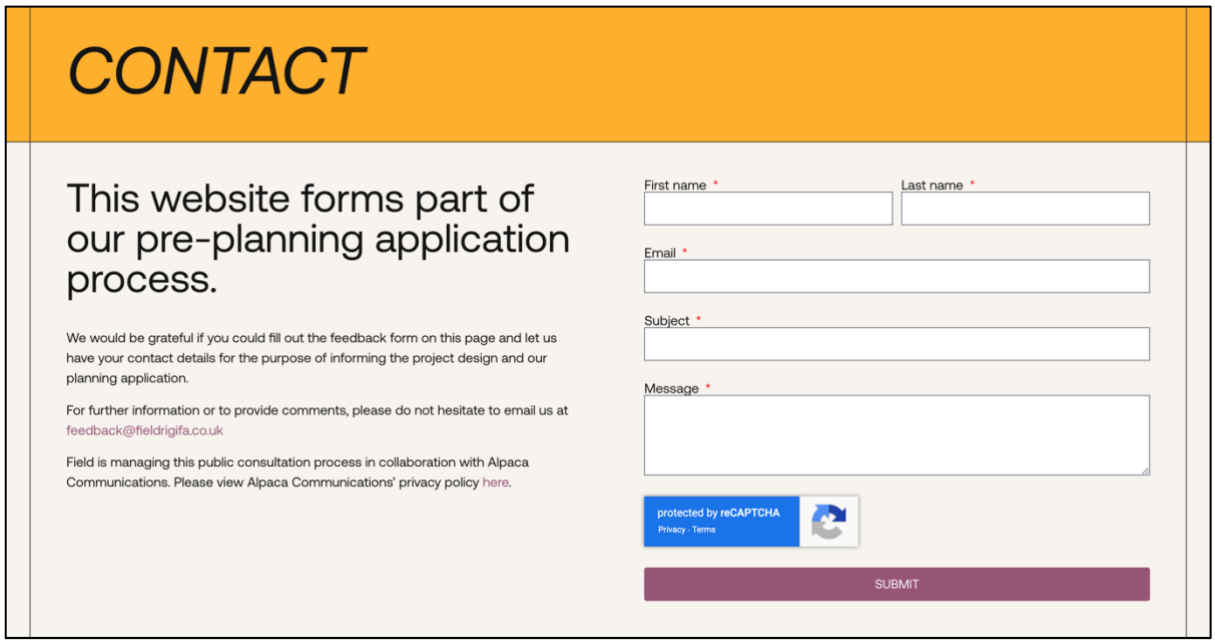




Documents Page



Contact Page



Appendix 4: Brochure sent to local residents

FIELD

FIELD RIGIFA BATTERY STORAGE

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

We are holding two public consultation events on:

Tuesday 25th June 2024 | 2pm-7pm and

Thursday 22nd August 2024 | 2pm-7pm,

at Mey Village Hall, Castle Entrance, Mey, Caithness, KW14 8XH

WHAT ARE WE PROPOSING TO BUILD AND OPERATE?

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 Rigifa, on land to the south-west of the planned Gills Bay Substation.

Field Rigifa would connect directly to the planned Gills Bay substation, and would be capable of storing up to 200 MW of electricity. This is expected to avoid up to 1.4 million tonnes of CO_2e emissions during the first 20 years of operation. This would be achieved by supplying the grid with electricity stored when renewable energy generation is high, therefore reducing reliance on high carbon energy sources when renewable generation is low.

Our first site was Field Oldham, a 20 MW battery which has been operating since Autumn 2022. Field Rigifa would join Field Oldham as part of a nationwide network which, together, will help the UK reach net zero.

WORKING WITH LOCAL COMMUNITIES

Our batteries will provide huge benefits to the UK, and we take great care to make sure this is not to the detriment of the communities that host them.

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.

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 enough 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 Rigifa 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

Scotland has set a target to become net zero by 2045, with a reduction in greenhouse gases of 75% by 2030 and 90% by 2040*. 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 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."

*https://www.gov.scot/policies/climate-change/

FIELD RIGIFA

Field Rigifa would be located directly south-west of Gills Bay Substation. The built infrastructure (batteries, cables, access tracks, etc.) is proposed to cover an area of approximately 10 hectares.

We'll also provide landscaping and biodiversity enhancements to ensure we are having a positive impact on the land we use and its local setting.

Field Rigifa 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 stored.

- An underground cable connection to connect the battery to the existing Gills Bay 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.

FREQUENTLY ASKED QUESTIONS

What makes Field a committed and responsible developer for the long term?

Many developers look to take the project to shovel-ready status - that's securing land, grid connection and planning permission, and then sell the project on.

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 look to take the project to shovel-ready status - that's securing land, grid connection and planning permission, and then sell the project on.

We will be working with the community during early design and development, construction, and throughout the operation of the project.

When will Field Rigifa 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 encourage and equip 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 battery 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 and bunding, 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.

FIELD RIGIFA
Battery storage

FEEDBACK FORM

To return your completed feedback form please tear it from the brochure and pop it in the post by **Friday 30th August 2024**. Alternatively, you can return your form via email to **feedback@fieldrigifa.com**.

Title: Name:
Address: Postcode:
Email: Telephone:

1. Has this brochure been helpful in understanding our proposal? ☐ Yes ☐ No ☐ Not sure
2. With regards to the proposals you have read about within this leaflet, are you:
☐ In favour ☐ In objection ☐ Of no opinion
3. Please use this space to provide any comments on the proposal. We would welcome your feedback on all aspects of the emerging design shown in the brochure.

Please provide your contact details if you wish to get a response. Any information provided will only be used for the purpose of the planning application to the Local Planning Authority and will not be disclosed with any third parties. Your contact details will not be listed on the planning application documentation. Field is managing this public consultation process in collaboration with Alpaca Communications.

Instructions

FOLD HERE

Freepost
ALPACA COMMUNICATIONS LIMITED

INDICATIVE TIMELINE

Early 2024	25 June 2024	22 August 2024	Autumn 2024	Early 2025	2027 onwards
Early environmental assessments and design work	Public consultation event 1	Public consultation event 2	Submission of planning application	Determination of planning application	Construction and operation

JOIN US AT OUR PUBLIC CONSULTATION EVENTS

We're on a mission to build the renewable energy infrastructure needed to reach net zero, starting with battery storage. Your feedback can help us to improve our proposals for Field Rigifa.

For further information, please visit our website at **www.fieldrigifa.co.uk**.

We're holding two public consultation events at Mey Village Hall, Castle Entrance, Mey, Caithness:

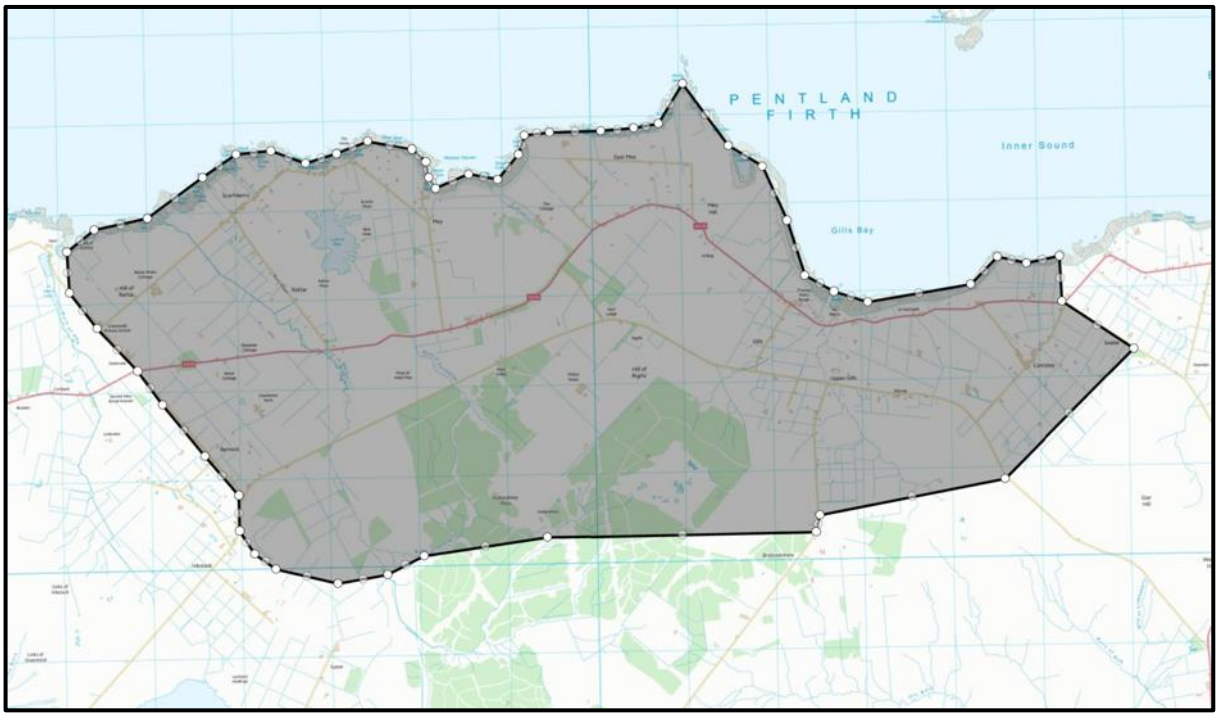
Tuesday 25th June, 2pm-7pm
Thursday 22nd August, 2pm-7pm

You can submit your feedback to us or write to us via:

Email: **feedback@fieldrigifa.com**

Freepost: **Alpaca Communications Limited**

Appendix 5: Local resident invite brochure distribution area



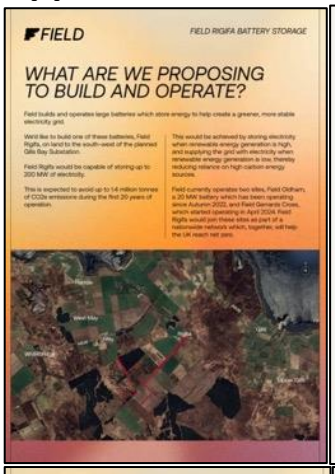
The brochure for the public consultation event was sent out on 12th June 2024 to 420 addresses.

Appendix 6: Public consultation event adverts

The advert above was posted in the *John O'Groats Journal* on the 14th June April 2024.

The advert above was posted in the *John O'Groats Journal* on the 9th August 2024**.**

Appendix 7: First consultation event boards



FIELD

FIELD RIGIFA BATTERY STORAGE

PLANNING APPLICATION

To support our planning application, we are proposing to submit the following documents and assessments:

- Ecology Statement
- Ground Condition Risk Assessment
- Landscape and Visual Impact Assessment
- Flood Risk Assessment / Drainage Strategy
- Noise Impact Assessment
- Archaeology and Cultural Heritage Statement
- Transport Statement and Outline Construction Traffic Management Plan
- Outline Battery Safety Management Plan
- Design Statement
- Planning / Sustainable Place Statement
- Pre-application Consultation Report.

Following submission, these documents will be available to the public via the Energy Consents Unit's website.

Please note that comments made during this pre-application consultation phase are not representations to the Scottish Ministers. Following submission of the planning application to the Energy Consents Unit, there will be an opportunity to make representations directly to the Scottish Ministers.

WHAT HAPPENS NEXT?

We're holding a second consultation event here at May Village Hall, Castle Entrance, May, Cathness, KW14 8WH, on Thursday 22nd August 2024. We'll continue accepting feedback via post or email until Friday 30th August 2024.

We'll then integrate your feedback into the final planning application and submit this to the Energy Consents Unit in Autumn 2024.

After it's submitted, you will have the opportunity to make a representation about the application to the Scottish Ministers, via the Energy Consents Unit.

WANT TO KNOW MORE?

For more information, please visit our website at www.fieldrigifa.co.uk

If you have any questions or you'd like to provide comments, please do not hesitate to email us at feedback@fieldrigifa.co.uk.

FIELD

FIELD RIGIFA BATTERY STORAGE

OUR OTHER BATTERY SITES

Field's experienced team manages each battery storage project's full lifecycle. With projects going through every stage of development and operation, we apply learnings and best practices across our portfolio to ensure reliable, safe and sustainable facilities. A brief overview of three of these sites is included below:

Field Auchterarder
50 MW, near Fort Augustus
In construction

Field Oldham
20 MW, near Manchester
Operational

Field Gerrards Cross
20 MW, Buckinghamshire
Operational

FIELD

FIELD RIGIFA BATTERY STORAGE

FIRE SAFETY MANAGEMENT

Safety is our top priority. We take a comprehensive approach to fire risk management through careful design, operating procedures, and emergency planning.

Battery Design and Safety Systems

- Batteries must be compliant with all relevant fire codes and safety standards, and we'll only use batteries with the highest fire safety ratings and performance will be used.
- Battery containers are fitted with early fault and fire detection technology, internal fire suppression systems, and reinforced casing to ensure fires do not spread to other units.
- Appropriate separation distances are provided between battery strings, access roads, and surrounding properties to ensure firebreaks are in place.

Emergency Planning and Response

- A detailed Battery Safety Management Plan is being developed, which will be agreed with relevant authorities before the project starts operating. This identifies potential hazards and associated safety mechanisms for the long-term operation of the Project.
- Field is continuing to engage with the National Fire Chiefs Council and Scottish Fire and Rescue Service across our portfolio of projects, including regular on-site consultations and site familiarisation visits. An Emergency Response Plan will be prepared in consultation with the Fire and Rescue Service for use in the unlikely event that there is an emergency on site.

Construction & Operation Oversight

- 24-hour surveillance and fault detection systems will ensure any faults are identified, isolated and responded to as quickly as possible, including de-energisation when necessary.
- Field will undertake routine site inspections, maintenance and testing throughout the life of the project.

Field is committed to implementing industry best practices and working closely with fire authorities to ensure the safety of our facilities, our staff, and local communities. We welcome any further inputs as we finalise the fire safety approach for Field Rigifa.

FIELD

FIELD RIGIFA BATTERY STORAGE

WHAT OUR BATTERIES WILL LOOK LIKE

Our battery units will be housed in secure cabinets, similar to those shown in the images below, which were taken at our Field Newport site. These allow for a modular design where individual battery racks can easily accessed during routine inspections and maintenance.

Field Rigifa will comprise multiple battery cabinets arranged in rows, known as 'strings'. These will be connected via underground cables to other important electrical infrastructure like transformers, an on-site substation, and underground cabling to the main grid connection point at the planned Gills Bay substation.

To reduce visual impacts of the proposal, native landscaping will be incorporated to help screen and soften views of the site.

The below image shows what the proposed battery storage units look like. While the infrastructure may be visible from select viewpoints, our design aims to minimise impacts on the local landscape as much as possible.

An image taken at Field Newport (April 2024)

Appendix 8: Second consultation event boards

Updated boards presented at the second consultation event have been highlighted below in red.


FIELD

FIELD RIGIFA BATTERY STORAGE

PLANNING APPLICATION

To support our planning application, we are proposing to submit the following documents and assessments:

- Ecology Statement
- Ground Condition Risk Assessment
- Landscape and Visual Impact Assessment
- Flood Risk Assessment / Drainage Strategy
- Noise Impact Assessment
- Archaeology and Cultural Heritage Statement
- Transport Statement and Outline Construction Traffic Management Plan
- Outline Battery Safety Management Plan
- Design Statement
- Planning / Sustainable Place Statement
- Pre-application Consultation Report.

Following submission, these documents will be available to the public via the Energy Consents Unit's website.

Please note that comments made during this pre-application consultation phase are not representations to the Scottish Ministers. Following submission of the planning application to the Energy Consents Unit, there will be an opportunity to make representations directly to the Scottish Ministers.

WHAT HAPPENS NEXT?

We're holding a second consultation event here at Moy Village Hall, Castle Entrance, Moy, Caithness, KW12 6XH, on Thursday 22nd August 2024. We'll continue accepting feedback via post or email until Friday 30th August 2024.

We'll then integrate your feedback into the final planning application and submit this to the Energy Consents Unit in Autumn 2024.

After it's submitted, you will have the opportunity to make a representation about the application to the Scottish Ministers, via the Energy Consents Unit.

WANT TO KNOW MORE?

For more information, please visit our website at **www.fieldrigifa.co.uk**

If you have any questions or you'd like to provide comments, please do not hesitate to email us at **feedback@fieldrigifa.co.uk**.


FIELD

FIELD RIGIFA BATTERY STORAGE

OUR OTHER BATTERY SITES

Field's experienced team manages each battery storage project's full lifecycle. With projects going through every stage of development and operation, we apply learnings and best practices across our portfolio to ensure reliable, safe and sustainable facilities. A brief overview of three of these sites is included below:

Field Auchterarder
50 MW, near Fort Augustus
In construction

Field Auchterarder will be capable of producing up to 50 MW of electricity once operational. Located near Fort Augustus, Field is continuing to work closely with The Highland Council, with the project expected to start operating in late 2024.

The project demonstrates Field's expertise in developing battery storage on greenfield sites while prioritising landscaping and biodiversity measures to complement the surrounding environment. We've worked closely with the local community to manage traffic impacts including implementing a one-way system for construction traffic on half the number of construction vehicles on a sensitive route used by residents to minimise disruption to the community.

Field Oldham
20 MW, near Manchester
Operational

Field Oldham started operating in 2022 and can produce up to 20 MW of electricity. The site is located in a warehouse in the Greater Manchester region.

Field Gerrards Cross
20 MW, Buckinghamshire
Operational

Field Gerrards Cross started operating in April 2024 and can produce up to 20 MW of electricity. The site occupies an existing industrial site alongside an operating water treatment plant.

Field's automated systems, industry-leading safety protocols, and 24/7 remote monitoring in place, Field Gerrards Cross and Fram Chiltern highlight our commitment to safe, responsible operations.


FIELD

FIELD RIGIFA BATTERY STORAGE

FIRE SAFETY MANAGEMENT

Safety is our top priority. We take a comprehensive approach to fire risk management through careful design, operating procedures, and emergency planning.

Battery Design and Safety Systems

- Batteries must be compliant with all relevant fire codes and safety standards, and we'll only use batteries with the highest fire safety ratings and performance will be used.
- Battery containers are fitted with early fault and fire detection technology, internal fire suppression systems, and reinforced casing to ensure fires do not spread to other units.
- Appropriate separation distances are provided between battery strings, access roads, and surrounding properties to ensure firebreaks are in place.

Emergency Planning and Response

- A detailed Battery Safety Management Plan is being developed, which will be agreed with relevant authorities before the project starts operating. This identifies potential hazards and associated safety mechanisms for the long-term operation of the Project.
- Field is continuing to engage with the National Fire Chiefs Council and Scottish Fire and Rescue Service across our portfolio of projects, including regular on-site consultations and site familiarisation visits. An Emergency Response Plan will be prepared in consultation with the Fire and Rescue Service for use in the unlikely event that there is an emergency on site.

Construction & Operation Oversight

- 24-hour surveillance and fault detection systems will ensure any faults are identified, isolated and responded to as quickly as possible, including de-energisation when necessary.
- Field will undertake routine site inspections, maintenance and testing throughout the life of the project.

Field is committed to implementing industry best practices and working closely with fire authorities to ensure the safety of our facilities, our staff, and local communities. We welcome any further inputs as we finalise the fire safety approach for Field Rigifa.


FIELD

FIELD RIGIFA BATTERY STORAGE

WHAT OUR BATTERIES WILL LOOK LIKE

Our battery units will be housed in secure cabinets, similar to those shown in the images below, which were taken at our Field Newport site. These allow for a modular design where individual battery racks can easily accessed during routine inspections and maintenance.

Field Rigifa will comprise multiple battery cabinets arranged in rows, known as 'strings'. These will be connected via underground cables to other important electrical infrastructure like transformers, an on-site substation, and underground cabling to the main grid connection point at the planned Gills Bay substation.

To reduce visual impacts of the proposal, native landscaping will be incorporated to help screen and soften views of the site.

The below image shows what the proposed battery storage units look like. While the infrastructure may be visible from select viewpoints, our design aims to minimise impacts on the local landscape as much as possible.

An image taken at Field Newport (April 2024)

Appendix 9: Comments received via feedback form and Applicant's response

COMMENTS RECEIVED	FIELD'S RESPONSE
Absolute no brainer - we need battery storage to make best use of the renewable energy resource in our area. No problem with Rigifa - well-designed scheme, well out of the way and totally uncontroversial	Field thanks the respondent for their comment.
Sad to see the trees being cut down next to our house (Near West Lodge)	Field does not intend to fell the trees at West Lodge as part of the Proposed Development. It is understood that the plantation trees will be removed to facilitate the construction of SSE's Gills Bay substation. The trees are then proposed to be replaced with a permanent woodland in accordance with their approved landscaping plan (21/05536/FUL). All works in the vicinity of West Lodge are in relation to SSE's proposed works, not Field's.
Only issue for me is the felling of trees, near West Lodge	
Although in favour, I'd like more information on the safety aspects + record. As you say we're familiar with batteries + know they can leak, overheat + even explode!	Field thanks this respondent for their comment. Further information on battery safety is provided within the Outline Battery Safety Management Plan as part of this application.