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24a Stafford Street
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6th March 2025

Energy and Climate Change Directorate
Energy Consents Division

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cc Paul.smith@gov.scot

Dear Sir/Madam,

Request for EIA screening opinion in respect of Proposed 500 MW battery energy storage system (BESS) including associated infrastructure and landscaping at Land Northeast of Rothienorman, at Land at Middleton of Blackhills, AB51 8YN (GR: NJ696358)

Introduction

On behalf of the prospective Applicant, Blackford Renewables Ltd., and in accordance with the provisions of the Electricity Works (Environmental Impact Assessment) (Scotland) Regulations 2017 (as amended) ('the EIA Regulations'), this correspondence comprises a request for a screening opinion in relation to the development generally described above from the Scottish Government (SG) and its Energy Consents Unit (ECU). As confirmed by Letter from the Chief Planner on 27 August 2020, the Scottish Government considers that a battery installation generates electricity and is to be treated as generation. It, therefore, considers that the proposed development will require consent from the Scottish Ministers under section 36 of the Electricity Act 1989 ("the Electricity Act").

The EIA Regulations comprise two schedules of development and which identify developments for which EIA is mandatory (Schedule 1) and those developments which *may* require EIA (Schedule 2) if it is likely to have significant effects on the environment by virtue its nature, size, or location. An EIA for BESS developments of 500MW is not mandatory as such developments are not listed in Schedule 1 of the EIA Regulations. EIA is therefore not mandatory.

As relevant to the proposed development, Schedule 2 Development are defined as those which:

"The carrying out of development (other than development which is Schedule 1 development) to provide any of the following –
(1) A generating station.

On the basis of SG's stated opinion, that BESS is a generating station, the proposed development falls within Section (1) of Schedule 2 and therefore the proposal must be considered against the criteria listed within Schedule 3 of the EIA Regulations to determine whether significant effects on the environment are likely, but there is no automatic and mandatory requirement for EIA.

This Screening Request is submitted in accordance with regulation 7 and regulation 8 of the EIA regulations and information is provided to enable the ECU on behalf of the Scottish Ministers to adopt an Opinion on whether the Development is or is not EIA development, in accordance with Schedule 3 in relation to the characteristics of the Proposed Development, the location of the Proposed Development, and the characteristics of the potential impact.

To further inform consideration, guidance on screening is also provided in Planning Advice Note (PAN) 1/2013: Environmental Impact Assessment and Circular 1/2017 Environmental Impact Assessment Regulations. The Circular reaffirms that EIA may not be required in the case of Schedule 2 Development, as the test is based on the likelihood of significant effects on the environment of the particular development.

The Application Site

The entire area of interest comprises one roughly rectangular parcel of agricultural land, which comprises part of a larger field which has been used for arable farming. It is understood that the land is graded as 3.2, being good quality agricultural land but is a small part of the land in the ownership of the landowner who farms the land. As grade 3.2 it is not Prime Agricultural Land.

The site is relatively flat but does slope downhill to the north east. Land to the east then rises gently towards a single-track road. It is framed by a recent and significant electricity sub-station to the west, and ancient woodland to the south west and the remaining boundaries of the field not within the red line boundary to the west and north. The wider area generally has countryside characteristics with agricultural fields and a scattering of houses along narrow country roads but within a changing context as it has some industrial appearance due to overhead transmission lines the sub-station and other energy-related development.

At the south west of the site, a BESS development (49.9MW), was granted planning permission under application ref: APP/2022/2252 for Installation of Battery Energy Storage System (49.9MW) and Associated Infrastructure. The proposed development will however have an independent connection to the Rothienorman Sub-station.

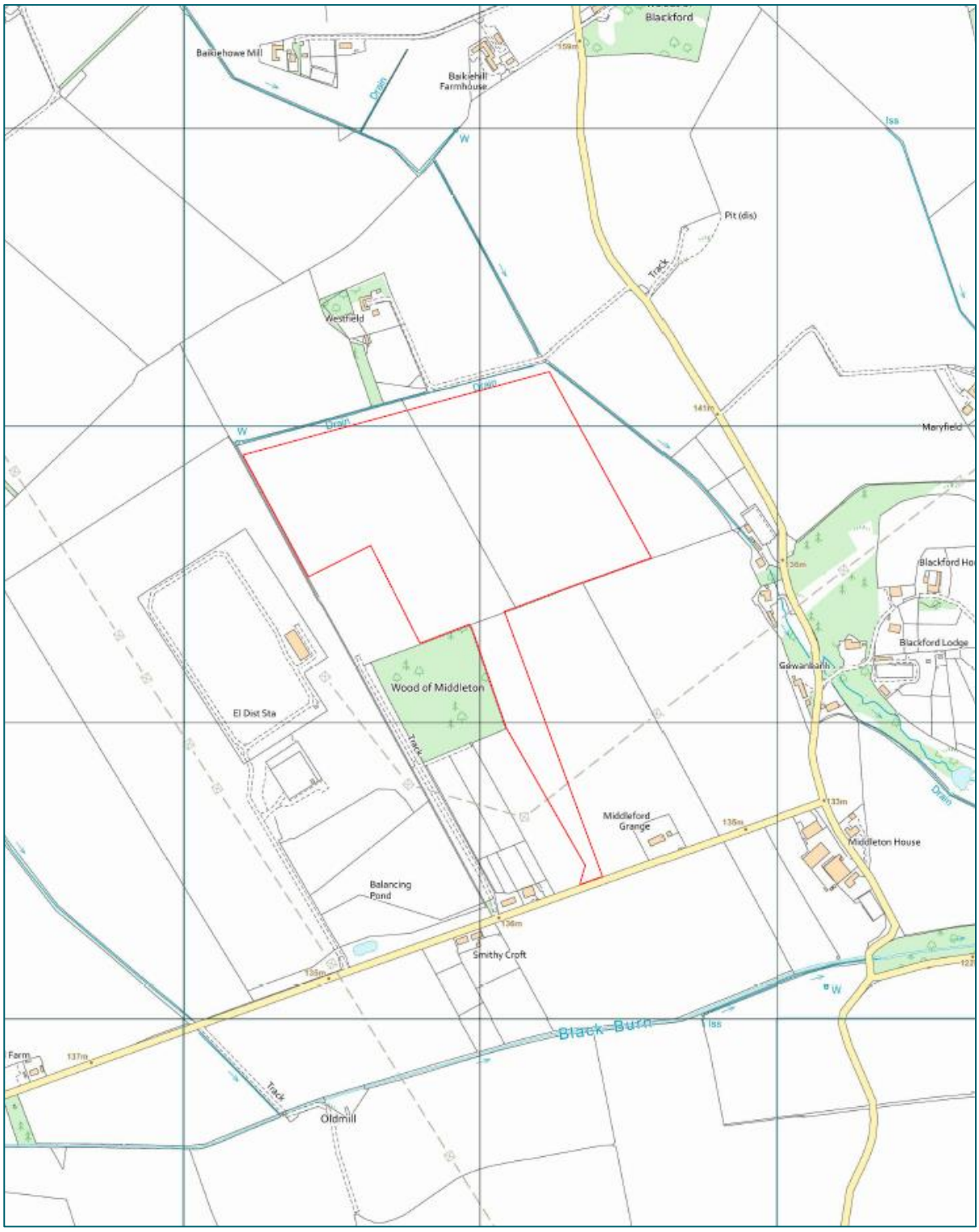

Figure 1: Location Plan

As currently shown, the red line boundary incorporates agricultural land and is 17.38ha is area.

The land is currently used for agricultural purposes, and the adopted Local Development Plan identifies that the site is not Prime Agricultural Land (PAL). The nearest residential properties are indicated in the figure below and are c. 230m from the anticipated development location and c. 170m from the red line boundary.

Figure 2: Location of nearest dwellings.

The land falls away to the east and north east. The boundaries to the site are generally identified by hedged field boundaries. A field drain / water course is located at the site's northern boundary and also close to but offset from the redline boundary at the east of the site. SEPA flood maps identify no flooding on the site, existing or future.

Centrally within the south of the site a scattered row of trees extends c. 100m into the site. These are close to but slightly separated from Ancient Woodland (Wood of Middleton) to the south and south west of the site. To the west of the site, the Rothienorman Sub-station is separated from the site by a continuous row of mature trees.

Whilst in the countryside, the area is influenced by other development, including energy-related infrastructure,

including:

- Overhead lines running east / west to the south of the site;
- Consented development for 49.9MW at the south west of the site;
- Rothienorman Sub-station to the west of the site.

There is no known relevant planning history to the site other than the aforementioned 49.9MW BESS development.

Within the nearby surroundings, there have been a number of applications for renewable energy developments, in addition to the development of the sub-station development.

Other than the immediately adjacent BESS, two other 49.9MW BESS developments have been approved in the area, one to the east of the substation (ref: APP/2022/2252) and the other circa 1.5km to the north / north west of the site (ref: APP/2022/1218). These grid and energy infrastructure approved in recent years is plotted below on figure 3.

Figure 3: Approved grid / energy infrastructure in the area.

The wider area generally has a countryside characteristic with agricultural fields, scattered development and the hamlet of Blackford with Rothienorman circa 2km to the east of the site.

Figure 4: Wider site area.

Background

The proposed development has been the subject of recent Pre-application consultation with the ECU and consecutively with Aberdeenshire Council (ref: ENQ/2024/1654). The first of two public consultation events is scheduled for March 6th, 2025. It is intended to hold a further consultation exhibition (in person) when the details of the proposal are more definitive following consideration of the pre-application assessments and first consultation event.

It is envisaged that the proposed development will be the subject of an application to the ECU in Spring 2025. It is intended that the application will be accompanied by a suite of documents to include a Planning Supporting Statement, including an NPF 4 compliance assessment, a Design and Safety Report, a Pre-Application Consultation Report, Transport Statement, Ecology Report, Landscape Assessment and Visual Impact including a Landscape Strategy, Archaeology Report, Preliminary Ecology Assessment and Surveys, Drainage Impact Assessment and Strategy, including a Flood Risk Assessment, CTMP and Noise Impact Assessment.

Proposed Development

This proposal seeks to meet the requirements of the contract that the prospective Applicant has with the National Grid for the erection of a 500MW storage facility in this general location. The proposal consists of (view in context

of Figure 3):

- A BESS with a capacity of 500MW– to meet contract requirements and energy needs.
- Painted green battery containers placed within that compound, single storey, 3m in height
- High Voltage Switchgear proposed for the southwest portion of the Site at a maximum of 13m height – to meet energy requirements.
- Palisade green security fencing 2.4m in height around the site.
- Boarded timber fencing up to 4m in some areas of the site which require additional acoustic attenuation.
- Terracing of the land with landscaping between the units and on the boundaries of the site – to ensure the proposal fits into the landscape as far as is reasonably practical.
- Earth berms / bunds are proposed within the site and at the boundaries of the application site to mitigate visual and noise impact.
- Solar PV array is proposed at the north west and around the north and east boundary of the site to provide renewable energy for the operational energy demands of the site. This energy generation would not be for distribution to the grid.
- Each terrace will be provided with an access track – for accessibility and maintenance.
- Access is proposed to utilise the access route approved under application ref: APP/2022/2252 from the unnamed road to the south of the site.
- A large SUDs Pond will be provided on site – improve the ecological value, to ensure no water drains at excessive rates, and prevent contaminated water leaving the site in the event of an emergency.
- Water tanks will act as a reservoir to cool the units in the extremely unlikely event of an emergency, in the interests of health and safety.
- An underground cable will be provided from the BESS facility to the Rothienorman substation, at the site's west boundary– to reduce the visual impact of the development, supply safe and secure interconnections and maintain the supply of energy to the existing facility.
- Approximately 120 jobs will be created during the construction of the project, and as far as possible, attempt will be made to source jobs locally. It is also intended to source construction materials locally, as far as is practical, to reduce costs and transportation. During the operational phase, the nature of BESS development is one of high energy generation but low employment generation, as it will be operating remotely. It will largely be an unmanned site in terms of physical presence with 3-4 permanent positions created to look after the site, mainly in groundworks and landscape maintenance.
- Perimeter areas of the proposed development will be maintained as a habitat improvement area – to enhance flora and fauna and the landscape and accordingly to provide additional benefit over and above meeting energy needs. Existing field boundaries will be supported and enhanced.

The exact siting and location of the proposed development is not confirmed at this time and will be directed by base-line environmental and technical assessments which are being undertaken, and the pre-application consultation. Other equipment will likely be proposed, including generators, welfare unit and control / switchgear units.

The proposed layout suggests development offset from the northern and east field boundaries to ensure development is grouped close to existing and approved development at Rothienorman Substation. The battery units are anticipated to be delivered in 7 double rows with switchgear and transformer unit at the south west of the site.

It is anticipated that extensive landscaping and planting will be proposed around the proposed development. Indicatively shown at figure 5 below.

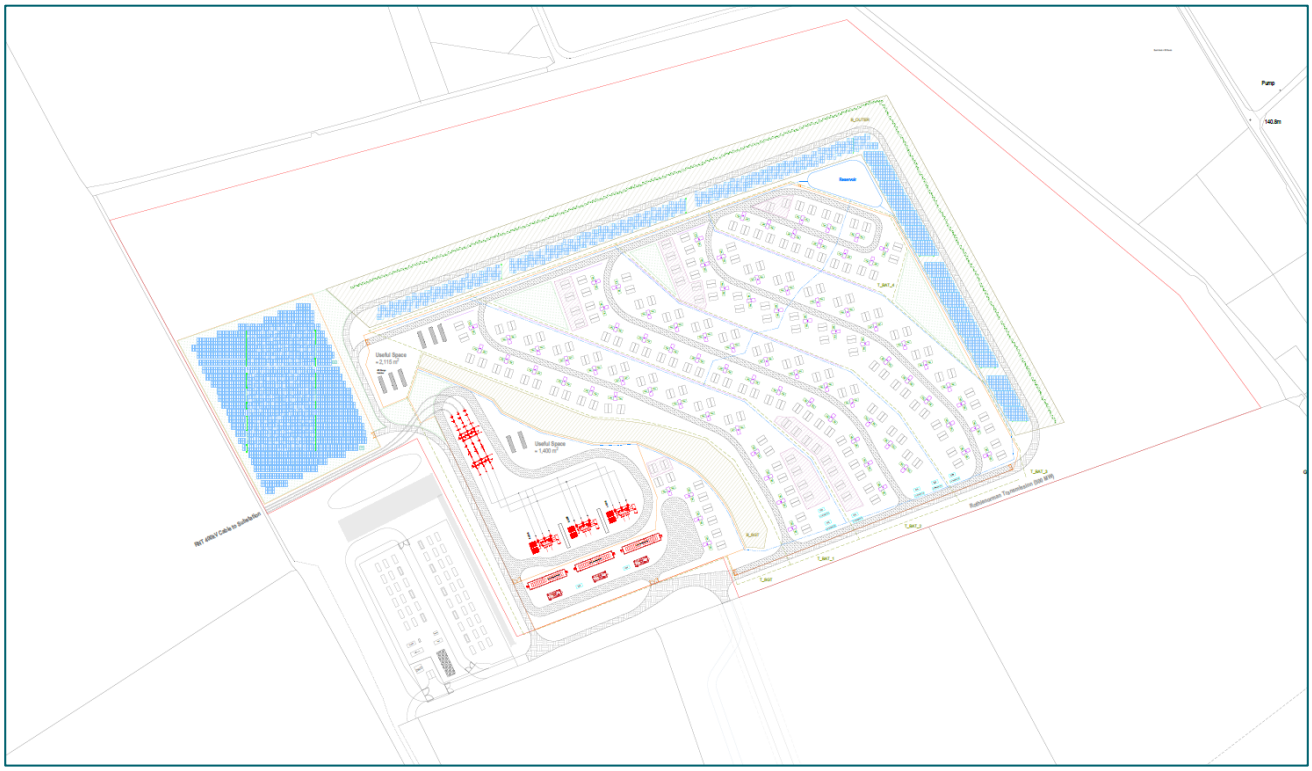

Figure 4: Proposed site plan

Figure 5: anticipated landscaping provision

EIA Regulations 2017

As the proposal is for BESS, comprising 500MW, the proposed development may be considered to fall within Section (1) of Schedule 2, as stated in the introductory section above. It is considered that the nature and scale of the proposed development is such that it does not constitute 'EIA development' and does not require assessment in accordance with the EIA Regulations. The need for EIA of the proposed development should therefore be 'screened out' at this stage. The reasoning behind this is set out below.

- The proposal does not constitute Schedule 1 development under the terms of the EIA Regulations.
- The site is not one defined as 'sensitive' as stated in Schedule 2 of the EIA Regulations (albeit this is referenced to OH lines).
- No sensitive environmental site lies within 4km of the site and the nearest heritage site lies on the east edge of the town of Longside, some 750m to the west of the site. The nearest residential property lies immediately to the south / south west of the site.

Considering the size and design of the proposed development, and given its location entirely outside any sensitive designation, it is proposed that the application be supported by a number of non-EIA appraisals and assessments, preliminary work for which has already been carried out. The initial baseline studies have found that:

- Landscape and Visual Impact –
  The Site lies in the Scottish Natural Heritage National Landscape Character Assessment LCT 32 Farmed and Wooded River Valleys. The Farmed and Wooded River Valleys Landscape Character Type comprises the well settled, wooded and diverse valleys of the Rivers Deveron Bogie and Ythan.

  A preliminary LVIA has found that the proposals will result in a direct change to the Site itself from one of agriculture to one of infrastructure resource. Please see LVIA supporting figures in stand alone documents submitted with this letter.

  The development is anticipated to represent a degree of change on a relatively small part of the Landscape Character Area, which will be mitigated with landscaping, earthworks and tree planting to help integrate the BESS into the landscape. The preliminary LVIA suggests mitigation comprise the following main elements;
  - Reinstatement of hedgerow (only if removed for construction purposes)
  - Provision of new hedgerow and structural vegetation planting along boundaries of the Site, including gapping up where appropriate. Species mix to match the existing hedgerow.
  - Maintain an overall sense of openness of the remaining land.
  - Opportunities for new tree planting on the sides and tops of the embankments, providing an increase in canopy cover across the Site. Trees shall be planted at varying sizes and species (of local provenance) to allow for a range in height and diversity in tree stock. Embankments to be seeded with a wildflower grass seed mix to tie in with the development to the south;

  Accordingly, the preliminary assessment is that the BESS proposal will not represent a significant impact on the landscape resource and landscape character on construction, and diminishing further as a landscape management scheme matures in the longer term.

  As the location of the site is within an undulating landform with a series of localised views seen principally from the local road network or farmsteads to the south, east and north, an appropriate Zone of Theoretical Visibility (ZTV) identifying 23 viewpoints to assess the impact on the landscape has been identified and further submitted to AC for consideration and adaptation and inclusion of additional viewpoints should it be deemed necessary.

  The significance of the visual effects will likely be relatively localised from slightly elevated positions looking across or over existing hedges and field boundaries. Overall, the visual effects will reduce over the longer term when the proposed landscape mitigation takes effect.

  The detailed LVIA will be submitted with the application. It will follow good practice guidance produced by the Landscape Institute and will evaluate the likely effects of the proposed development on the immediate and wider landscape area. It is proposed that visualisations will be included in the LVIA, and which will be agreed in consultation with the ECU and AC.

A Landscape Strategy will be prepared as the design evolves and will be submitted as part of the application documentation

- Ecology
  A draft Ecological Assessment has been undertaken across the entire red line area at this time. This identifies a number of potential habitats associated with woodland to the south west and field boundaries. The most relevant habitats in immediate proximity to the development area are predominantly found on site at field boundaries, and that the significant majority of the site is unrestricted and only arable land of low nature conservation interest will be heavily impacted.

  The highest conservation interest is arable field margins which are likely to be minimally impacted only as development will be kept away from boundaries as much as possible. Accordingly, it is considered that with proposed mitigation and enhancement measures, the nearby watercourse / field drains will be protected and there will be biodiversity enhancement. Protected species including Bat, Badgers and Pine Marten are identified to be required, and all required species surveys will be undertaken as necessary.

  Whilst not a requirement of either NPF4 or Aberdeenshire Local Development Plan 2023, a Biodiversity Net Gain Feasibility Report will be submitted with any application to demonstrate enhancement.

- Cultural Heritage
  A Desk Based Assessment (DBA) of the site's Archaeological potential has been undertaken to inform the proposed development. The site is not in proximity to existing heritage assets, previous work within the vicinity of the site has revealed a limited number of prehistoric features. There is therefore considered to be a medium potential for prehistoric evidence to be present although modern arable activity within the Site may have had a detrimental impact on any below ground remains. All appropriate trenching and further investigation will be carried out in agreement with Aberdeenshire Council advice.

- Transport / Highway Safety
  During the operational stage, traffic generation will be low, as to be negligible on the road network. Impact will be more significant during construction and decommissioning stages, when the volume of vehicles will not be significant, but vehicle-types will be large.

  Construction works would be undertaken from 08:00 to 18:00 Monday to Friday, and 09:00- 13:00 Saturday. No construction would be undertaken on Sundays nor on Bank Holidays.

  Related traffic will be routed to the site via the A96 to the west, and onward via the A920 and the B992. This is in line with the existing construction vehicle routing for the nearby BESS site located further west of the proposed development, and also for the existing 50MW BESS site.

  Swept path analysis has been undertaken on the worst-case scenario for vehicles accessing the site and indicates access into the site will require widening. A Construction Management Plan will be adopted prior to any works starting at the site. The application will be accompanied by a Transport Statement.

- Noise
  An initial Noise Assessment has assessed the baseline noise environment for the site and will utilise this data to define the likely siting, layout and detail of the proposal and to assess the impact of the proposed development on receptors within the local environment. The methodology of utilising NR20 and BS 4142 were agreed with the local planning authority at pre-application discussions.

  The final siting and layout may still evolve, and a detailed Noise Impact Assessment will be submitted with the application and, where necessary, mitigation will be proposed in the form of earth bunding, and acoustic fencing. Mitigation features will ensure that there is no significant impact on receptors from the proposed development.

- Drainage
  The initial Drainage assessment report has concluded that the development can be accommodated on site without any impact on drainage or flooding on site or within the area, subject to mitigation. A detailed Drainage Impact Assessment and Drainage Strategy, with Flood Risk Assessment, will accompany the application. SEPA flood maps identify that the site is not within any flood area, current or future. Assessment of any impact on existing Private Water Supplies will be undertaken.

Schedule 3 sets out the selection criteria which must be applied when determining whether a Schedule 2 development is likely to have "significant effects" on the environment. The three tests of the selection criteria are as follows and considered in Table 1.

- Consideration of the characteristics of the development,
- Consideration of the location of the development; and
- Consideration of the characteristics of the potential impact.

Table 1: Assessment Against Schedule 3: Characteristics of the Development

Characteristics of the Development	Consideration / Assessment for Screening
(a) the size and design of the development;	The development of the site to create a 500MW BESS with associated development and landscaping area on a site in close proximity to existing electrical infrastructure, is not significant in context of the site and surroundings. The units will be no more than 3m in height individually, with the HV Switchgear being no more than 13m, to accommodate requirements for Scottish Power. The proposed battery units will be set into the landform with mitigating landscaping, to soften any appearance. There will be no significant impact on any sensitive environment.

(b) cumulation with other existing development and/or approved development;	Three 49.9MW BESS developments have been approved in the local area. One of these is located circa 1km to the north west of the site and is not within the site's Zone of Theoretical Visibility. One of the others is located to the east of the Rothienorman substation and so separated from the site and is not within the Zone of Theoretical Visibility. The third is located adjacent to the south west boundary of the site. Despite this the sites are and will be individually designed and visually mitigated and the cumulative impact will not be significant. There are other examples of circumstances of BESS and sub-station developments being co-located, and no EIA was required based on cumulative impact, for example reference, the associated screening opinion (ref: ECU00004836) for the BESS (350MW) development at Gibston Farm and immediately adjacent to the Blackhillock Sub-station in the adjacent Moray Council Area.
(c) the use of natural resources, in particular land, soil, water, and biodiversity;	The proposed site to be developed is outwith areas identified to be prime agricultural land. The proposed development includes habitat improvements including landscaping strengthening. The land can be restored following decommissioning. No natural resources are expected to be irreversibly impacted by the Proposed Development. An ecology report, landscape strategy, drainage strategy, flood risk assessment, geo-environmental ground conditions report will be submitted as part of the application. No significant environmental effects are expected.
(d) the production of waste;	Solid waste in the form of packaging will be produced during construction (for example packaging and materials). This waste will be taken off-site and disposed of by certified contractors according to requirements. No waste is expected during the operational phase due to the limited activity on site. Toilets will be self-contained, and foul waste will be disposed of off-site by certified contractors. Surface water will be discharged to existing watercourses, with attenuation ponds. No significant effects are expected.

(e) pollution and nuisances;	There is potential for noise, light, vibration and air quality emissions from construction vehicles and machinery during construction and decommissioning. The site is not located within any sensitive area. The proposed development is to be offset from the nearest receptors sensitive to noise, vibration, light and air quality. The impacts during construction and decommissioning stage would be temporary only, of approximately 18 months. Mitigation will be incorporated into the design and layout of the infrastructure to minimise noise to nearby noise sensitive receptors, including residents and ecological receptors. Mitigation requirements will be guided by the results of the Noise Impact Assessment (NIA). Lighting will be provided and will be directed and shielded to prevent overspill beyond the site but will only be used for emergency purposes, except during construction periods. There is low risk potential of pollution during construction and decommissioning stage from leaching of chemicals into the land, and the ground water. Mitigation will be put in place through the CEMP to ensure control equipment and substances and works. No pollution is expected during the operational stage. Where any water is discharged on site for the purposes of equipment cooling or fire suppression, the proposed drainage system will be designed to isolate this water and prevent outrun to the water environment. A full Private Water Supply Risk Assessment is being prepared and will be submitted with the application. Public engagement on this matter is underway. It is considered that the potential for significant effect is minimal, subject to mitigation which will be identified through Noise, Ecology, Drainage, and Transport which will be submitted as supporting documents.
(f) the risk of major accidents and/or disasters which are relevant to the project concerned, including those caused by climate change, in accordance with scientific knowledge;	There are potential risks associated with the construction and decommissioning stages, as with all developments. The proposed development will be designed to industry standards and the construction and decommissioning stages will meet all relevant HSE

	legislation. Risk will therefore, be minimised. As with all electrical proposals, there are small risks from fires at BESS sites. Industry standards will be met and National Fire Chiefs Council's guidance for Battery Energy Storage Systems will be utilised to design all fire suppression means and site design. Water tanks will be situated on site to enable sufficient water sources to be available in the unlikely event of fire. Proposed SuDS and retention ponds will be designed to prevent outflow to the wider water environment where water for fire suppression is utilised. A full Flood Risk Assessment and Drainage Strategy will be prepared and submitted with a future application and a Design and Safety Statement will be submitted as part of the application documentation. Significant effects from accidents and/or disasters are expected to be low.
(g) the risks to human health (for example due to water contamination or air pollution).	Any impact to human health is considered to be low – potentially from noise, vibration, and light during construction but which can be mitigated through design and compliance with all required HSE legislation. No significant effects are considered likely as a result of the proposed development.

Table 2: Assessment Against Schedule 3: Location of the Development

Location of the Development	Consideration / Assessment for Screening
(a) the existing and approved land use;	The existing use of the land is agriculture, and the site is surrounded by similar land use. The development is reversible. No significant effect is likely.
(b) the relative abundance, availability, quality, and regenerative capacity of natural resources (including soil, land, water, and biodiversity) in the area and its underground;	No significant effects are considered likely. The site area comprises some 17.38ha of land. The application site will not be significant in relation to the wider area, of similar landscape, landform, soil, water and biodiversity and will utilise areas demarked by existing field boundaries for containment. There is some potential for sensitive and protected species and habitats on site, and which will be considered and assessed in the Ecological Assessment. All necessary species surveys are currently being undertaken to confirm presence or absence of these species, and any required mitigation necessary.

(c) the absorption capacity of the natural environment, paying particular attention to the following areas:	
(i) wetlands, riparian areas, river mouths;	Small watercourses/field drains run close to the site. No significant effect is likely. This will be assessed in the Drainage Assessment and Ecological Assessment.
(ii) coastal zones and the marine environment;	n/a
(iii) mountain and forest areas;	n/a
(iv) nature reserves and parks;	The nearest site of significance lies more than 1km from the site. The intervening distance will mean no significant impact. This will be addressed in the Ecological Statement and LVIA.
(v) European sites and other areas classified or protected under national legislation;	n/a
(vi) areas in which there has already been a failure to meet the environmental quality standards, laid down in Union legislation and relevant to the project, or in which it is considered that there is such a failure;	n/a
(vii) densely populated areas;	n/a
(viii) landscapes and sites of historical, cultural, or archaeological significance.	The nearest site of significance lies within the nearby hamlet of Blackford and is c. 750m from the site. In agreement with the local planning authority, it is considered that the intervening distance will mean no impact. This will be addressed in the Heritage Statement.

Table 3: Assessment Against Schedule 3: Types and characteristics of the potential impact

Location of the Development	Consideration / Assessment for Screening
(a) The magnitude and spatial extent of the impact (for example geographical area and size of the population likely to be affected)	The magnitude of the impact is not significant. The site comprises agricultural fields, surrounded by the same land use with sporadic scattering of residential properties outwith Blackford and Rothienorman 2km to the east.
(b) the nature of the impact	Initial assessment indicates no significant potential impact which cannot be mitigated. The impact will be considered and assessed appropriately with any application. A full suite of supporting documents, as outlined in this letter, will be submitted. The site is not adjacent to any designated sensitive site.
(c) the transboundary nature of the impact	The site is within Aberdeenshire Council administrative area, to which the comment above applies regarding proximity of sensitive properties and designations. No significant impact is expected.
(d) the intensity and complexity of the impact	A full suite of supporting documents will be submitted with any application assessing any impact. There is no risk of environmental standards being breached and

	mitigation can be put into place to control operations. No significant impact is expected.
(e) the probability of the impact	There is a low probability of significant effect. Any potential impact will be mitigated appropriately and does not constitute EIA development. The supporting suite of documents will outline any suitable mitigation measures as required.
(f) the expected onset, duration, frequency, and reversibility of the impact	Any construction impact will be temporary and managed through an appropriate Construction Traffic/Environment Management Plan. The level of impact will be typical of any similar development. No significant effects are anticipated.
(g) the culmination of the impact with the impact of other existing and/or approved development	No significant cumulative effects are anticipated, despite the recent change to this environment. Impacts are localised. As has been identified within this letter, despite other development in proximity to the site, all but one BESS development is outwith the Zone of Theoretical Visibility of the site. Construction work is not expected to overlap with other approved development but if it does it will be temporary and construction traffic is proposed to avoid population centres to minimise traffic impact.
(h) the possibility of effectively reducing the impact	Mitigation will be introduced to reduce the impact of the development including landscaping proposals and biodiversity enhancement. All legislative requirements concerning HSE will be implemented, and a CEMP will be adopted to mitigate environmental effects during construction and operation respectively. No significant adverse effects on the environment and human health are anticipated.

In the context of these tests and with mitigation, the impact of the proposed development is likely to be limited.

Conclusion

This screening request includes the required information set out in Regulation 8 of the EIA Regulations. Considering the above, it is considered that the proposal does not constitute EIA development as defined by the EIA Regulations. The impact of the proposals on the site and surrounding areas will be thoroughly addressed through a suite of supporting documents as outlined below:

- Design and Safety Statement
- Planning Statement
- Pre-Application Consultation Report
- Transport Statement
- Construction Traffic Management Plan (CTMP)

- Archaeology / Heritage Assessment
- Ecology and Biodiversity Net Gain Report
- Landscape and Visual Appraisal
- Landscape Strategy
- Noise Impact Assessment
- Drainage Impact Assessment and Strategy, including Flood Risk Assessment
- Private Water Supply Risk Assessment
- Carbon Assessment
- Fire Assessment
- Geo-Environmental Ground Conditions Report.

It is requested that the Energy Consent Unit, on behalf of the Scottish Ministers, confirms agreement that the proposed development does not constitute EIA development and accordingly issues an opinion that an EIA Report is not, therefore, required.

Please do not hesitate to contact me should you wish to discuss this further.

Yours sincerely,

Hugh Shepherd

Hugh Shepherd MSc MRTPI
Associate Director

Scott Hobbs Planning