



# Achies Battery Energy Storage System

## Community Engagement Plan

February 2025

Rev. DRAFT



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# 1. Introduction

## 1.1 The Community Engagement Plan

This 'Community Engagement Plan' (CEP) outlines the community engagement programme for the proposed Achie's Battery Energy Storage System (BESS). We feel that it is important that the community has an input into the plan and we would therefore invite your comments on this document. Our aim is that the document will guide our engagement, so we want to make it as relevant, useful and appropriate as possible.

The purpose of the CEP is to ensure that local communities have the opportunity to engage with the project as it evolves before a formal application is made. The project team believes that the best way to ensure that the consultation approach is appropriate is to involve stakeholders in its design. Existing stakeholders and community groups will typically be well aware of their own engagement and communication needs and have an understanding of what is likely to work in their communities.

We are consulting with key community leaders and representatives on the CEP design. This has involved collaborating to identify relevant stakeholders as well as consideration of the methods and timetable for engagement proposed in this document. If you have any comments about the plan, we would be grateful if you could feed them back to the project team.

## 1.2 Aims and objectives of community engagement

This document describes how engagement with community stakeholders is arranged and facilitated to provide an opportunity for people to:

- Learn more about the proposal
- Raise any concerns they may have
- Make suggestions for improvement

It also describes how the information obtained from community engagement is recorded and taken into consideration when making project decisions.

The key objectives of our community engagement strategy are therefore:

- To build effective working relationships with communities based on mutual respect and trust
- To mitigate the risk of delays in consenting and/ or costly project changes through timely stakeholder buy in
- To fulfil regulatory obligations in accordance with relevant consenting regimes

## 1.3 Broader engagement

In addition to engaging with communities, the project team is developing an ongoing engagement programme targeting a range of other stakeholders who may have an influence over the proposals or be impacted by them. These stakeholders include:

- Regulatory stakeholders such as the Highland Council and the Scottish Government's Energy Consents Unit
- Landowners
- Statutory consultees such as NatureScot, SEPA, and Historic Environment Scotland
- Strategic organisations like the RSPB
- Politicians like Members of the Scottish Parliament or locally elected Councillors
- Economic stakeholders such as companies that could be involved in the construction and operation of the BESS, local businesses that may benefit from the project and economic development bodies

## 2. The Project

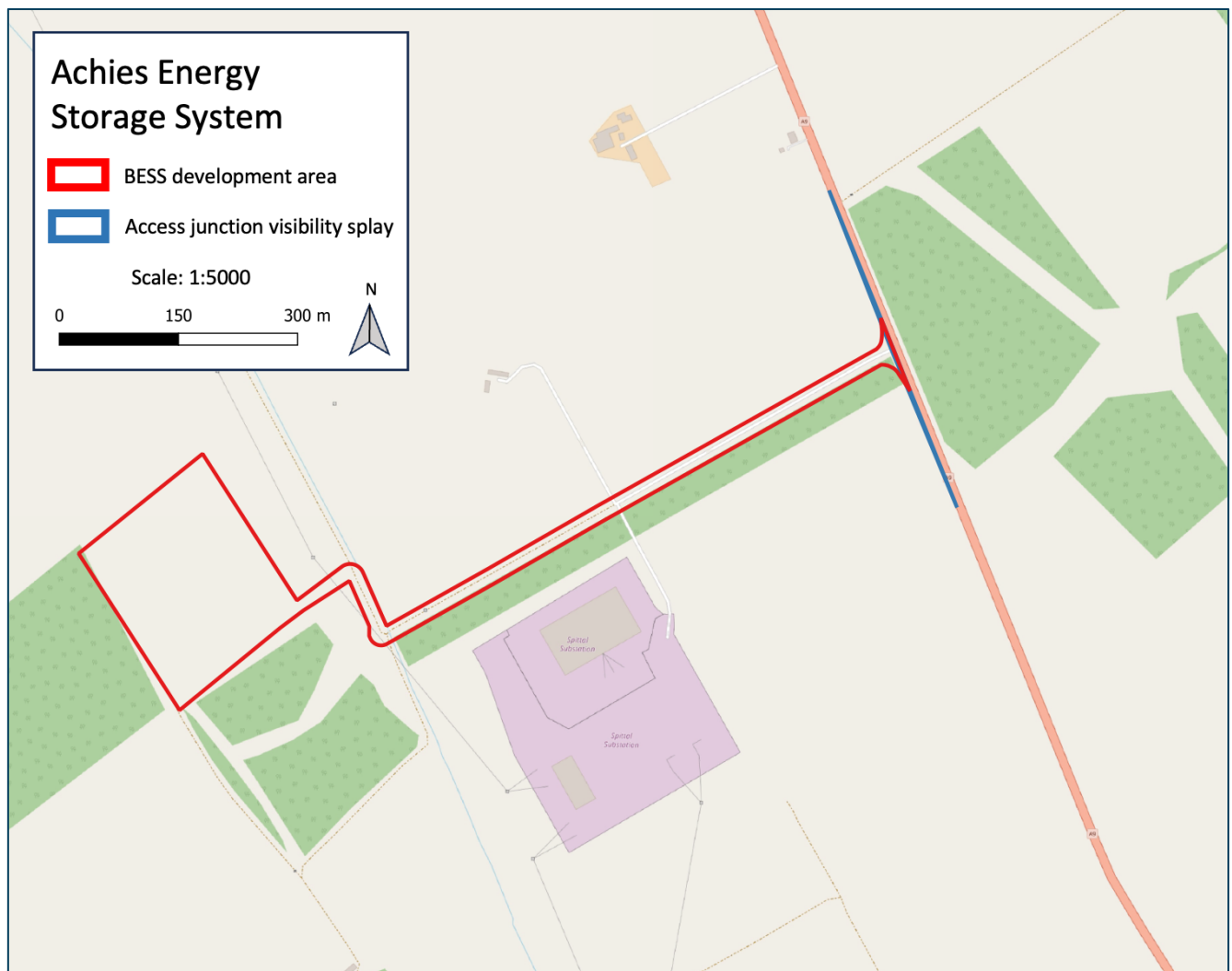
### 2.1 Location

The proposed Achie's Battery Energy Storage System (BESS) is located on land to the north-west of the existing Scottish and Southern Energy Networks (SSEN) Spittal Converter Station (see **Error! Reference source not found.**). Occupying an area of approximately 5 acres, the proposed BESS will have a grid export capacity of 162 MegaWatts (MW).

### 2.2 Background

The proposed development site has been significantly reduced following pre-application discussions with The Highland Council's planning officers. The original proposal extended across three parcels of land on both sides of the A9. Following feedback from the Highland Council, the revised proposal now includes battery energy storage only in one section of one of the three parcels. The area of land has reduced significantly in size from several hundred acres to approximately 5 acres.

Figure 1: Location of the proposed Achie's Battery Energy Storage System



## 2.3 The BESS

The layout of the BESS will be determined following design optimisation to balance a range of factors including battery choice and spacing, ground conditions and flood risk, archaeological features, wildlife and habitats, traffic and transport, and landscape and visual impact.

The development is expected to include a number of battery units and associated infrastructure to connect the units to the grid at the nearby Spittal sub-station. The batteries will be surrounded by a fence and possibly a bund (sloped earth) as well as plants to screen the development from view. More details about the proposal will be provided at the community events.

## 2.4 Sun4Net

Sun4net Ltd was established over a decade ago and has developed more than 40 megawatts of solar projects in Germany as well as several ground-mounted solar and battery projects in the UK. Locations include the Thames Estuary, Dorset, Sussex, Cumbria and, most recently at Dounreay where planning permission was recent secured for a BESS project which will be built during 2025.

### 3. Consenting Procedures

#### 3.1 The Electricity Act 1989

As the proposal has a generating capacity in excess of 50MW, the proposed Achie's BESS will be subject to an application for consent under Section 36 of the **Electricity Act 1989**. Applications for Section 36 consent are different to planning applications made under the **Town and Country Planning (Scotland) Act 1997** and are not determined to the local planning authority. Instead, they are determined by the Scottish Government's Energy Consent Unit (ECU) acting on behalf of Scottish Ministers. In accordance with this legislation, the local planning authority (in this case, The Highland Council) takes on the role of statutory consultee. This means that the ECU must consult with The Highland Council on Section 36 applications located within The Highland Council area.

#### 3.2 Assessing environmental effects

Sun4Net is committed to identifying and assessing the potential environmental effects of the development in order to inform the design of the project from an environmental perspective. The findings of these assessments will be presented in a report submitted with the application, which will also identify any mitigation measures required to minimise and manage the impacts of the project on the surrounding environment.

Table 1 outlines the topics currently being assessed and a report on the findings will be publicly available for comment and submitted with the Section 36 application.

**Table 1: Environmental topics for assessment**

Environmental Context	Topic
Physical Environment	<ul style="list-style-type: none"> <li>• Geology &amp; Hydrology</li> <li>• Air Quality, Noise &amp; Vibration</li> </ul>
Biological Environment	<ul style="list-style-type: none"> <li>• Freshwater Ecology</li> <li>• Terrestrial Non-Avian Ecology</li> <li>• Terrestrial Ornithology</li> </ul>
Human Environment	<ul style="list-style-type: none"> <li>• Land-use &amp; Other Users</li> <li>• Archaeology &amp; Cultural Heritage</li> <li>• Traffic &amp; Access</li> <li>• Landscape &amp; Visual</li> </ul>

#### 3.3 Community engagement policy

Whilst there are no statutory pre-application consultation procedures for Section 36 applications under the **Electricity Act**, the ECU has published guidance setting out their minimum expectations. In addition, Sun4Net is committed to complying with the best practice and conducting meaningful engagement with any communities or groups who might be affected by the proposed Achie's BESS.

The ECU's expectations regarding pre-application consultation for Section 36 applications is summarised in Table 2.

**Table 2: Pre-application consultation expected by the ECU**

Consultation activity	The applicant is expected to...
• Events	<ul style="list-style-type: none"> <li>• Hold two at least two public consultation events prior to submitting the application. The final public event should be held at least 14 days after the first public event.</li> <li>• Give members of the public the opportunity to make comments to the applicant about the proposed development.</li> <li>• At the final public event, provide feedback to the public on comments received about the proposed development.</li> <li>• Provide the following details at the public event and on the applicant's website:                             <ul style="list-style-type: none"> <li>• A description of the proposed development</li> <li>• A plan showing the outline of the site and enough context to be able to identify its location</li> <li>• Details regarding how the applicant can be contacted</li> </ul> </li> </ul>
• Notices	<ul style="list-style-type: none"> <li>• Publish a public notice on the applicant's website and in a local newspaper advertising a public event at least 7 days before holding the event.</li> <li>• Include the following information in the public notice:                             <ul style="list-style-type: none"> <li>• Description and location of the proposed development</li> <li>• Details of where further information can be obtained</li> <li>• The date and place of the public event</li> <li>• A statement explaining how, and by when, people can make comments to the applicant about the proposal</li> <li>• A statement explaining that comments made to the applicant are not representations to the ECU (i.e. the Scottish Ministers) and that there will be an opportunity to make representations to the ECU if and when the applicant submits an application for consent</li> </ul> </li> </ul>
• Report	<ul style="list-style-type: none"> <li>• Prepare a pre-application consultation (PAC) report explaining what consultation has been undertaken and submit this with the Section 36 application.</li> <li>• Include the following information in the PAC Report:                             <ul style="list-style-type: none"> <li>• Dates and places where the events were held</li> <li>• Description of any other consultation activities</li> <li>• List of bodies, groups, or organisations who were consulted and how this was done</li> <li>• Description of any materials sent to stakeholders or provided at public events</li> <li>• Copies of any visual presentation shown and photos of any display boards or materials used at the public events</li> <li>• Confirmation that stakeholders were informed that pre-application consultation does not remove the right or potential need to comment on the final application when submitted</li> <li>• Summary of written responses received and views raised at events including number of responses and number of attendees</li> <li>• Explanation of how the applicant took account of the views raised</li> <li>• Explanation of how members of the public were given feedback on the ways in which the applicant considered the views raised during the consultation</li> </ul> </li> </ul>



### 3.4 Best practice guidance

Sun4Net is committed to exceeding this guidance as it seeks to build effective, long-term working relationships with the project’s stakeholders, including local communities. The Scottish Government’s Planning Advice Note **PAN3/2010 Community Engagement** provides advice to applicants on ways to effectively engage with communities on planning matters. It links directly to the Scottish Government’s **National Standards for Community Engagement**<sup>1</sup> and endorses the **PAS SP=EED Framework (Successful Planning Equals Effective Engagement and Delivery)**.

Developed by Planning Aid for Scotland (now PAS), the **SP=EED Framework** provides a practical guide to undertaking effective engagement and is the primary model for this engagement strategy. It is based around eight criteria for effective engagement, as outlined in Table 3.

**Table 3: Summary of engagement approach using SP=EED Framework**

Criterion	Giving Information	Consulting and Listening	Actions by Sun4Net
Transparency and Integrity	The purpose of the engagement is clear and people can find out about it easily.	Rights to participate are clearly explained and opportunities to express opinions are publicised.	Plans for engagement clearly articulated in CEP.
Co-ordination	The timetable for the engagement process published and relevant relationships explained.	The timetable for the engagement process includes adequate periods for meetings, public events and discussions.	Draft timetable included in CEP and based on project timeline and experience on other projects.
Information	Information will be relevant, accurate and comprehensible to the target audience.	Information will be communicated and shared, aiming to invite feedback.	Range of formats and communication channels. Use of clear, unambiguous and jargon-free language.
Appropriateness	Information will be presented to suit its intended audience and can be accessed by all stakeholders at each stage of the process.	Engagement processes to fit the situation to be used, with opportunities for discussion and for questions to be raised and answered.	Consultation with community leaders on draft CEP to ensure approach is appropriate to local context.
Responsiveness	Relevant information will be provided at every stage of the process.	Findings from the engagement process will be analysed, disseminated, and potentially incorporated.	Programme of engagement to allow for responding to feedback and re-engaging as necessary.
Inclusiveness	Relevant representative groups/ organisations identified and information designed and disseminated to reach them.	Emphasis on allowing the voices of seldom heard groups and those most likely to be affected to be heard.	Consultation with community leaders to ensure representativeness and identify potential issues.
Monitoring and Evaluation	Distribution of information and feedback received on the engagement process will be analysed after the process is completed.	Monitoring and evaluation of the engagement process will take place on an on-going basis.	Ongoing monitoring of engagement including alterations to approach as required. Full reporting in line with planning guidance.
Learning and Sharing	Lessons from the engagement process will be identified and lead to on-going improvements in quality.	Lessons from the engagement process will be reviewed and shared with a focus on learning and training.	Lessons from previous engagement programmes have informed CEP. Ongoing review to identify opportunities for continuous improvement.

<sup>1</sup> National Standards for Community Engagement

## 4. Stakeholder Analysis

### 4.1 Stakeholder identification

The process of stakeholder identification and mapping follows best practice guidelines with the aims of inclusiveness and equality, giving stakeholders the opportunity to determine how they wish to be consulted. It is understood that a range of stakeholders will be interested in the project and will want to be consulted. The aim is to provide broad and fair access to allow stakeholders to participate as equals in the engagement process by delivering a consultation plan which respects the different needs and expectations of stakeholders.

### 4.2 Stakeholder landscape

For the purposes of this document, the focus is on community stakeholders. This group includes organisations or individuals which the project may affect because they live, work, or pursue other activities in the area. Although the engagement process enables statutory consultees (such as The Highland Council) to comment on behalf of community stakeholders, it is essential that the people whom the project will affect are informed about the activity and have the opportunity to be included directly in the consultation. Specific community groups who typically may be consulted are:

- People who have formed themselves into any group or groups for the purpose of objecting to or supporting the proposals
- People who are identified as 'hard to reach' or 'seldom heard'
- People with a particular perspective (e.g. people interested in working on the project)

### 4.3 Community stakeholders

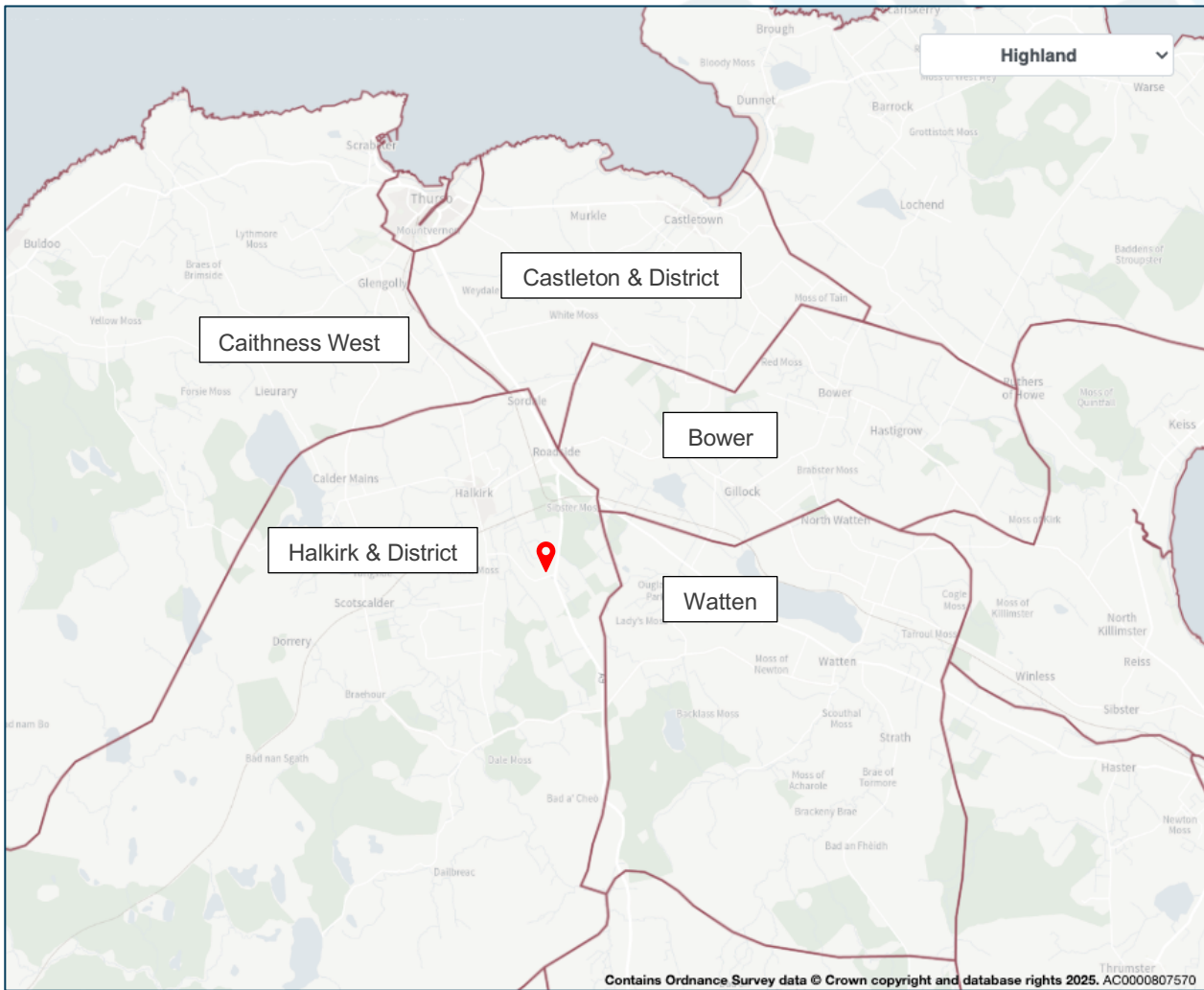
Impacted individuals and communities will include residents living in the vicinity of the development site. However, people from outside these areas may also have an interest in the project, such as tourists and visitors to the area. Our aim is to develop a comprehensive list of stakeholders and groups as the project develops. Recent experience on a nearby site has informed our understanding of the community landscape as it currently stands and this has helped us to identify relevant local groups such as Halkirk Village Council who should also be including in the consultation.

### 4.4 Community Councils

Community Councils typically are best placed to advise on the communication needs in their local area and have particularly useful insight into where and when to hold local public events. Figure 2 illustrates the relevant Community Councils to be targeted during the engagement, as follows:

- Castleton & District Community Council
- Caithness West Community Council
- Watten Community Council
- Bower Community Council (not currently operational)
- Halkirk & District Community Council

Figure 2: Relevant Community Councils



## 5. Tools Selected for Engagement

### 5.1 Criteria for selecting tools

The effectiveness of the CEP will ultimately depend upon the appropriateness and robustness of the tools used to engage. A number of key criteria have been considered when determining which methods to employ as detailed in Table 4. Based on these criteria and the project team’s experience of engaging with communities on other projects, the tools outlined below are proposed for the engagement.

**Table 4: Criteria for selecting engagement tools**

Criteria	Options
Stage	<ul style="list-style-type: none"> <li>• Very early stages require more informative techniques to establish a knowledge base amongst stakeholders</li> <li>• Subsequent stages will be more participative and interactive as the consultation seeks to canvass the views and comments of stakeholders</li> <li>• Later stages are likely to involve further informative elements to disseminate the findings and evaluate the effectiveness of engagement</li> </ul>
Stakeholder needs	<ul style="list-style-type: none"> <li>• Language</li> <li>• Accessibility</li> <li>• Support services (e.g. for those with caring responsibilities)</li> </ul>
Type of data required	<ul style="list-style-type: none"> <li>• Quantitative – used for categorising, measuring, profiling</li> <li>• Qualitative – gathering opinions, feelings, and suggestions</li> <li>• Balance to be struck between capturing more complex, in-depth responses from fewer stakeholders and less detailed input from a larger number of participants</li> <li>• How the data will be analysed and reported</li> </ul>

### 5.2 ‘Formal’ public exhibitions

Formal public exhibitions play a key part in effective pre-application consultation and provide real benefits as interested members of the general public are given direct access to the project team to discuss technical, social and environmental issues. Given evolving preferences for remote engagement, we are adopting a hybrid approach to formal public exhibitions by replicating the information provided on the project website.

Sun4Net proposes to hold face-to-face drop-in public exhibitions at suitable accessible locations in the vicinity of the proposal to provide an opportunity for broad stakeholder involvement. The drop-in format encourages participation by people who may be discouraged from contributing in the forum of a conventional public meeting. The events will incorporate methods for capturing opinions and views on the development, such as a community questionnaire.

The face-to-face exhibitions will be held over the course of a day and evening, providing greater accessibility to more people than a meeting whose audience is restricted to only those who can attend at a given time. These will be held in appropriate venues based on guidance from local community leaders. The first public events are scheduled for:

- Tuesday 4<sup>th</sup> March, 2.30pm to 7.30pm - Thurso Library, Davidson’s Lane, Thurso
- Wednesday 5<sup>th</sup> March, 2.30pm to 7.30pm - The Ross Institute, Halkirk

### 5.3 Content of exhibitions

The exhibitions will typically include:

- A project 'story board' display featuring details of the project and associated visual aids
- An explanation of the purpose of this consultation
- An outline of the consenting process for this project
- Summaries of any key documents and signposting to relevant sources
- Questionnaires and comments forms which offer the opportunity for feedback
- Project team contact details

### 5.4 Communications

Channels for communicating with community stakeholders will likely include:

- Leaflets providing details of the public consultation events sent to all business and residential addresses in a 3-mile radius of the proposed site in the lead up to the events. (Leaflets advertising the first round of public events will be delivered during the two-week period commencing Monday 17<sup>th</sup> February 2025.)
- Posters (as above).
- Exhibition materials: storyboards to be displayed at public events and on the engagement portal.
- Adverts/ public notices with details of the public consultation events in the *Caithness Courier*. (A public notice advertising the first round of public events will appear in the *Caithness Courier* on Wednesday 19<sup>th</sup> February 2025.)
- Project updates on the project website ([www.achiesenergystorage.com](http://www.achiesenergystorage.com)) which will be launched to coincide with the first round of public events.

### 5.5 Project questionnaire

Obtaining feedback from stakeholders is the overarching aim of the engagement process and it is critical that the data collected is managed and analysed effectively. To this end, a standard question set has been created which can be used in a variety of formats and settings.

At the public drop-in exhibitions, participants will be invited to complete the questionnaire. The questionnaire will also be available electronically on the website. Posters featuring details about where to complete the questionnaire (including QR codes, web addresses, telephone number to receive by post) will be sent out to local groups and venues to display.

## 6. Reporting and Recording

### 6.1 Data processing

With a comprehensive programme of engagement, it is important to record any data collected accurately and securely and to act on feedback received. Our process for collecting and storing data is fully compliant with the General Data Protection Regulations (GDPR) and ensures that all consultation responses are processed and considered appropriately. This includes reviewing proposals in light of feedback and producing a processing log which shares our responses to the consultation output in terms of specific actions taken or changes made to the proposals.

### 6.2 Reporting on engagement

A pre-application consultation (PAC) report will be produced and submitted alongside the Section 36 application, and is expected to include:

- Summaries of the consultation and engagement activities undertaken
- Responses received from community stakeholders
- An explanation of Sun4Net's response to the feedback received

## Appendix: Acronyms

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<b>Acronym</b>	<b>Definition</b>
BESS	Battery Energy Storage System
CEP	Community Engagement Plan
MW	Megawatt
PAC	Pre-Application Consultation
RSPB	Royal Society for the Protection of Birds
SEPA	Scottish Environment Protection Agency
SP=EED	Successful Planning Equals Effective Engagement and Delivery

## Contacts

**Name:** Ashley Seager  
Title: Director  
Tel: 01786 820 111  
Email: [ashley.seager@sun4net.co.uk](mailto:ashley.seager@sun4net.co.uk)

**By post:**  
FREEPOST FChange

[www.achiesenergystorage.com](http://www.achiesenergystorage.com)

**Name:** Peter Keep  
Title: Director  
Tel: 01786 820 111  
Email: [peter.keep@sun4net.co.uk](mailto:peter.keep@sun4net.co.uk)