



GONDOLIN

Land & Water

Civil Engineering & Environmental Solutions

Project	Flushing BESS
Client	Harmony FI Ltd
Document Title	Firewater Management Plan
Revision	Rev I
Prepared by	Annie Steingold
Checked by	Stephen Donnan
Date	09/06/2025

1. Context

Gondolin Land and Water Ltd (Gondolin) has been appointed by Harmony FI Ltd (the Client) to prepare a Flood Risk and Drainage Assessment (FWMP) in support of a planning application for the construction of a Battery Energy Storage System (BESS) and Substation site with associated infrastructure on land north of Flushing, Aberdeenshire, AB42 4XT within the Aberdeenshire Council Local Planning Authority (LPA) area.

This Firewater Management Plan (FWMP) report is prepared and submitted on behalf of Harmony FL Ltd. ('the Applicant') and in support of an application for consent under S36 of the Electricity Act 1989 ('the application') and also comprises a request that Scottish Ministers give a direction under section 57(2) of the Town and Country Planning (Scotland) Act 1997 that planning permission for the development be deemed to be granted. It addresses matters referred to in Schedule 9 to the Electricity Act, to development plan and policy guidance and to consideration of material matters.

The application comprises land within Aberdeenshire Council Area – 20.72ha ('Application Site'). A site location plan is included as Appendix A.

The description of the proposed development which is the subject of this application is as follows:

'Construction and operation of a 400MW Battery Energy Storage System (BESS) with associated infrastructure including, access roads, sub-station buildings, supporting equipment, fencing, drainage infrastructure and landscaping.' at Land North of Longside Road, Flushing, Peterhead (GR: 405524, 847560).

This FWMP report is part of a suite of documents submitted with the application, as outlined below. These supporting documents are in addition to the formal application documents comprising the accompanying plans, sections, and elevations. The full suite of supporting documents is as follows:

- Planning Design and Access Statement (PDAS)
- Community Wealth Building Plan (CWBP)

- Pre-Application Consultation Report (PACR)
- Confidential Ecological Survey Report [note, contains sensitive information]
- Confidential Protected Species Report [note, contains sensitive information]
- Archaeological Desk-Based Assessment (ADBA)
- Landscape and Visual Impact Assessment (LVIA) and Landscape Strategy
- Noise Impact Assessment (NIA)
- Flood Risk & Drainage Assessment Report (FRDAR)
- Fire Water Management Plan (FWMP)
- Private Water Supply Impact Assessment
- Topographical Surveys
- Construction Traffic Management Plan
- Transport Statement
- Outline Battery Safety Management Plan (OBSMP)

The Electricity Works Environmental Impact Assessment (Scotland) Regulations 2017 are also relevant to the proposal as the proposal comprises development falling within Schedule 2 of those Regulations. A Screening request has been submitted to the ECU and the Decision was received on 17th March 2025. It confirmed that, "Scottish Ministers adopt the opinion that the proposal does not constitute EIA development and that the application submitted for this development does not require to be accompanied by an EIA report."

The purpose of this report is to outline the proposed measures to ensure appropriate water supply provisions and water runoff containment in the event of a fire are provided as part of the proposed development.

Gondolin Land & Water Ltd (Gondolin) have also prepared a Flood Risk and Drainage Assessment (FRDA) report¹ to accompany the application which should be reviewed in conjunction with this letter.

In light of the release of National Fire Chiefs Council (NFCC) guidance² for Fire Rescue Services with respect to BESS, Gondolin have prepared this Firewater Management Plan (FWMP) to demonstrate how firewater runoff volume would be controlled and managed at the site.

It is noted that new draft NFCC guidance has recently been released however this strategy is based on the 2023 adopted guidance. Comparison of both versions of the guidance indicates that the adopted 2023 version is considered more conservative given the updates indicated within the draft guidance in terms of water supply volumes etc.

This FWMP is based on the management and full containment of over 58 hours of storage at a rate of 1900 l/minute for a total volume of 6,713m³ without intervention (within the BESS platform SuDS basin). This exceeds the minimum requirement for water supply of 2 hours at 1900 l/minute noted in the NFCC Guidance.

¹ Gondolin Land & Water Ltd (2025) Flushing BESS, FRDA Report Ref: GON.0533.0304, 9th June 2025

² National Fire Chiefs Council (2023) Grid Scale Battery Energy Storage System Planning – Guidance for FRS

Gondolin and / or Harmony FL Ltd shall liaise with the Scottish Fire and Rescue Service (SFRS) throughout the development and construction phases to ensure the proposed FWMP is in compliance with the latest best practice guidance.

2. Summary of Proposed Strategy

The proposed strategy to manage the firewater runoff generated is for **Full Containment** within the proposed SuDS Basin for the BESS development.

To achieve the full containment of the firewater runoff, specific control measures are proposed and details are included on Drawings FWMP-001, FWMP-002 and FWMP-003 enclosed.

A summary description of the FWMP Strategy Principles and Design Proposals are as follows:

1. The Engineered Formation Layer of the development platform (i.e., engineered base beneath the Type 3 stone capping layer) is to be suitably compacted and will be made impermeable. Firewater runoff will follow surface water drainage routes via subsurface perforated pipework and perimeter filter drains and will convey firewater runoff into the SuDS Basin. An enhanced network of herringbone drainage has been proposed within the design to ensure no firewater runoff is lost to the surrounding area.
 2. Development surfaces will be suitably graded to promote the capture of flow within the proposed herringbone drainage systems.
 3. The proposed SuDS basin shall be lined to prevent any uncontrolled discharge of potentially contaminated runoff.
 4. The Hydrobrake chamber at the SuDS Basin outlet is to be fitted with a remotely operated penstock valve and appropriately signposted as the Firewater Isolation Valve. As the SuDS basin shall be lined, the piped outlet is the only viable pathway for contaminated firewater to enter the water environment.
 5. The location and testing of the Firewater Isolation Valve will be duly incorporated into the site Operation and Maintenance (O&M) and Incident Response Plans. In the event of a fire, the Fire Isolation Valve is to be remotely closed as part of the wider site emergency response procedures to a fire being detected.
 6. The Client will sign into an agreement with a local emergency waste disposal service who can provide a sealed mobile tanker to the site in a timely manner. This will provide the means to remove contaminated runoff quickly in the event there is also additional rainfall volume to accommodate, or the firefighting volume exceeds the minimum volume available of 6,713m³. It is noted that the SuDS basin has capacity to store a 1-day rainfall event during the 1 in 30 year scenario whilst also being able to store over 34 hours of firewater runoff.
 7. Access for a mobile tanker would be achieved via the proposed track adjacent to the SuDS Basin. A mobile tanker shall be able to empty the SuDS basin with an extended suction hose able to extend up to 10-30m. If preferred, an accessible manhole chamber for pumping purposes can be installed at a preferred location adjacent to the site access track.
 8. It is recommended (if safe to do so) that any retained firewater is regularly tested within the SuDS basin. By undertaking water quality testing of the collected runoff, levels of contamination can be determined. This shall help determine where the collected runoff should be disposed of, which may include (subject to agreement with the SEPA)
-

reopening the outlet route if no contamination is present to allow the SuDS Basin to drain and discharge as normal. Monitoring and testing would be undertaken at regular intervals to ensure no change to the water quality.

9. Following the fire incident, appropriate inspections of FWMP control measures will be undertaken to ensure integrity is maintained and targeted measures will be drawn up for the Remediation Plan.
10. The Remediation Plan will likely involve continued closure of the Fire Isolation Valve for a period of time until the fire damaged equipment has been removed from site and high pressure targeted cleaning of the drainage system components has been conducted. Tankering of contaminated runoff off-site from the site may be required during this period. Topsoil lining the SuDS Basin may need to be stripped and disposed of off-site (i.e. at Landfill or similar). A schedule of soil sampling will be undertaken to determine this.
11. Only once the Topsoil is deemed safe or is replaced, the drainage system has been suitably washed and the water entering the SuDS Basin has been suitably tested and satisfies the relevant Environmental Quality Standards (EQS), will the Fire Isolation Valve be re-opened and surface water runoff be allowed to discharge to the watercourse to the east of the site.
12. Following the fire incident, updates to the O&M and Incident Response Plans will be made using site observations, feedback from SFRS and 'lessons learned'.

The above FWMP Summary should be considered provisional and a statement of commitment by the Client to implement the principles of the strategy. The exact final arrangements and details would be written up at the detailed design stages and into the site O&M and Incident Response Plans at the appropriate time.

3. Firefighting Water Supply

Scottish Water asset plans have been obtained to inform this assessment and are included as Appendix B to this document.

Review of local water supply plans indicates that there are public water mains that run some 500m south of the site for the residential properties just off Longside road (A950). Therefore, a connection to the mains to provide the firefighting flow rates required as stipulated by NFCC guidance (approximately 32 l/s) would not be feasible. Thus, for the purposes of this assessment, it is assumed that a connection to the existing mains is not possible which is considered a worst-case scenario.

As such, it is proposed to provide the initial fire fighting volume within the site through the provision of underground water storage within the site boundary. This storage provision shall be sized to provide the required initial 2 hour water supply for firefighting purposes as per NFCC guidance. The proposed water storage tanks are shown indicatively within the BESS development platform. The water storage tanks shall be fitted with a distribution system to provide hydrant access across the site to ensure fire fighting services can readily access the water supply at various locations across the site.

4. Closure

We trust the proposed measures and principles to manage firewater runoff at the proposed Flushing BESS are acceptable and provides SFRS the comfort that firewater can be appropriately managed at the site without posing a risk to the environment / human health.

Enc. Appendices:

Appendix A – Site Location Plan

Appendix B – Scottish Water Asset Plans

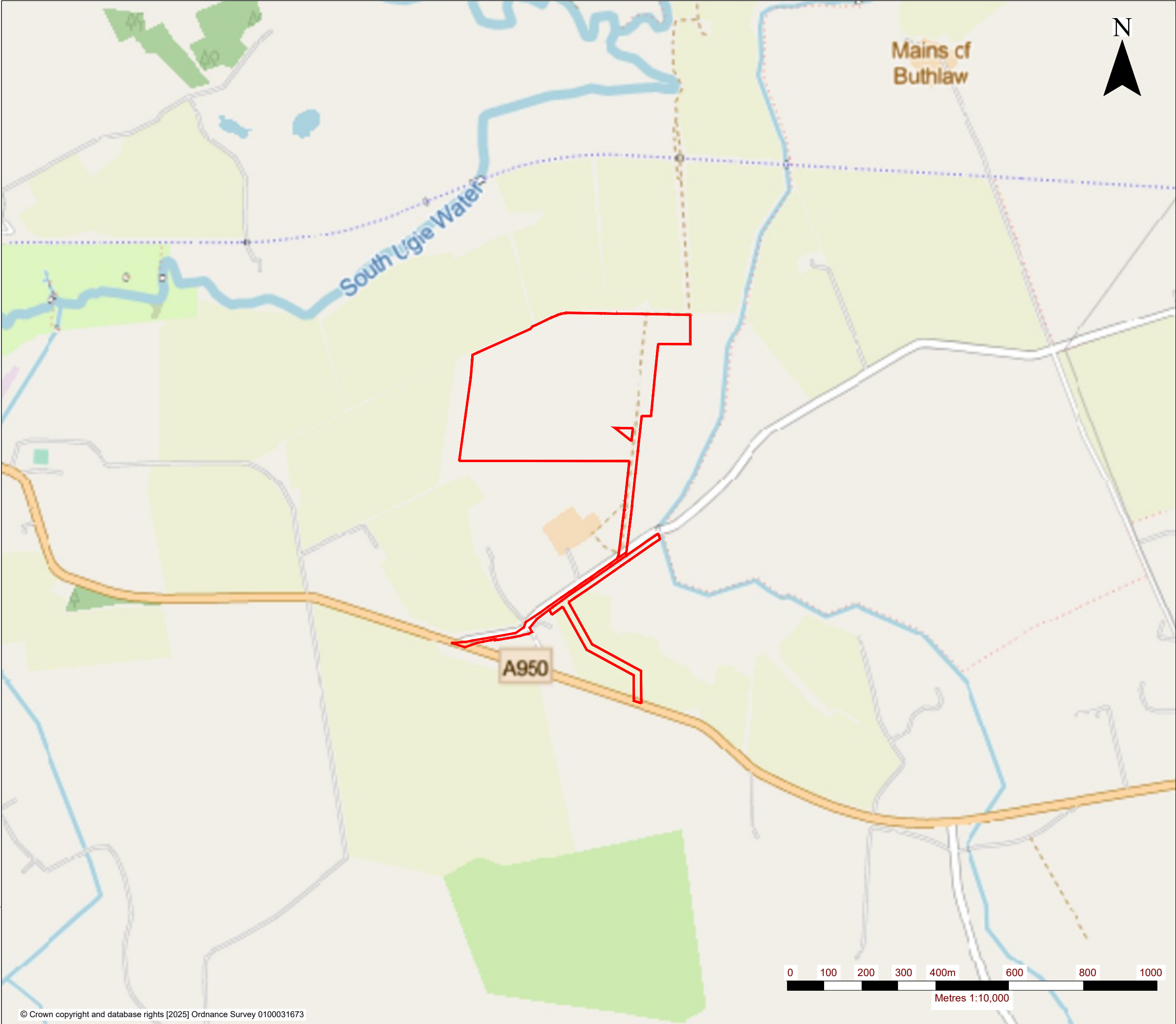
Drawings:

FWMP-001 – Firewater Management Overview

FWMP- 002 – Earthworks Overview

FWMP-003 – Firewater Management Details

Appendix A – Site Location Plan



LEGEND

PLANNING BOUNDARY

00	06/25	INITIAL ISSUE	GD	SD
REV	DATE	DESCRIPTION	BY	CHK

CLIENT:

HARMONY FL LTD

PROJECT:

FLUSHING BESS

DRAWING TITLE:

SITE LOCATION PLAN

SCALE:
1:10,000 @ A3

DATE:
JUNE 2025

DRAWING NUMBER:


APPENDIX A

REV:
00

DRAWING STATUS:

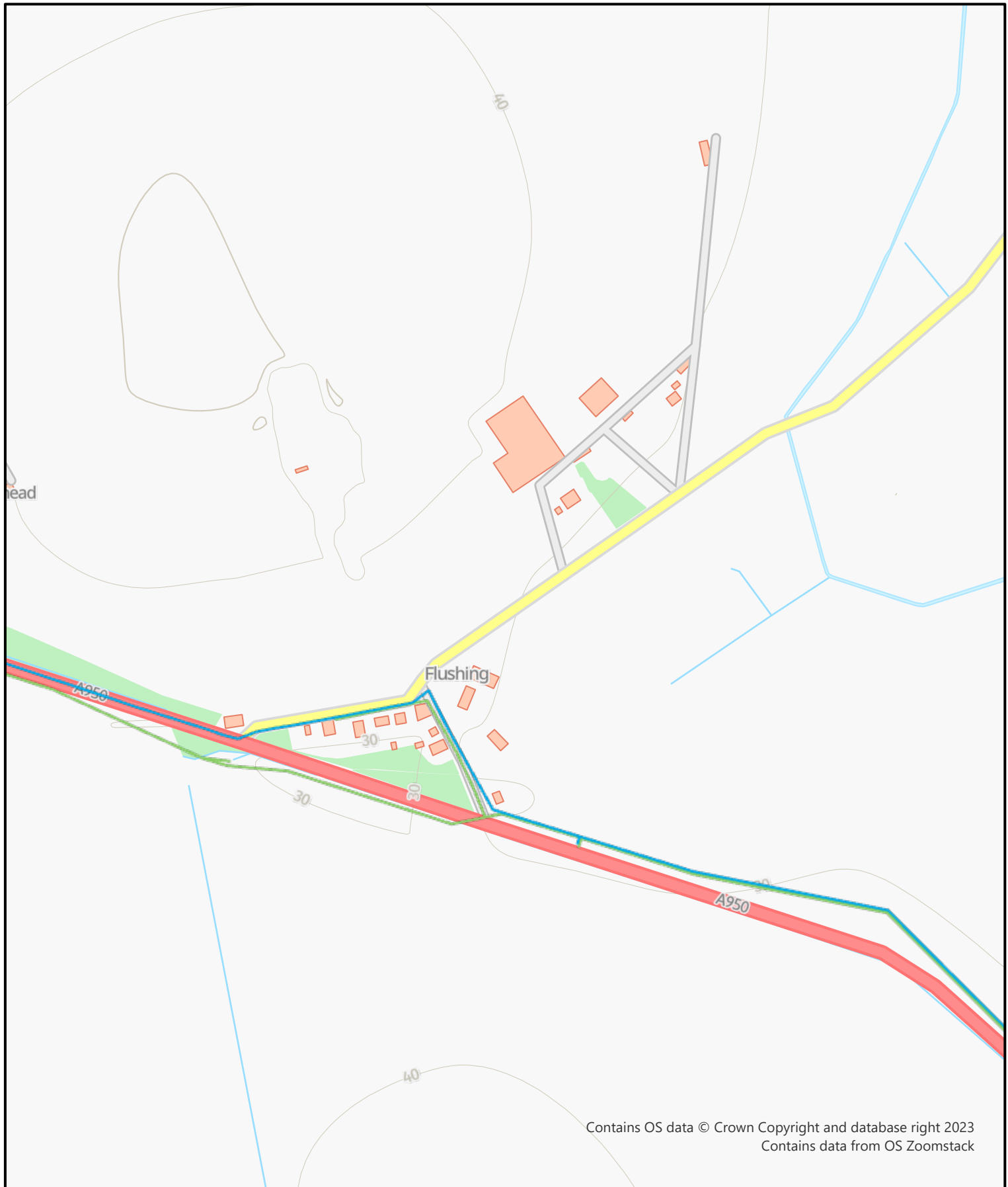
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15 Quayside Street
Edinburgh
EH6 6EJ
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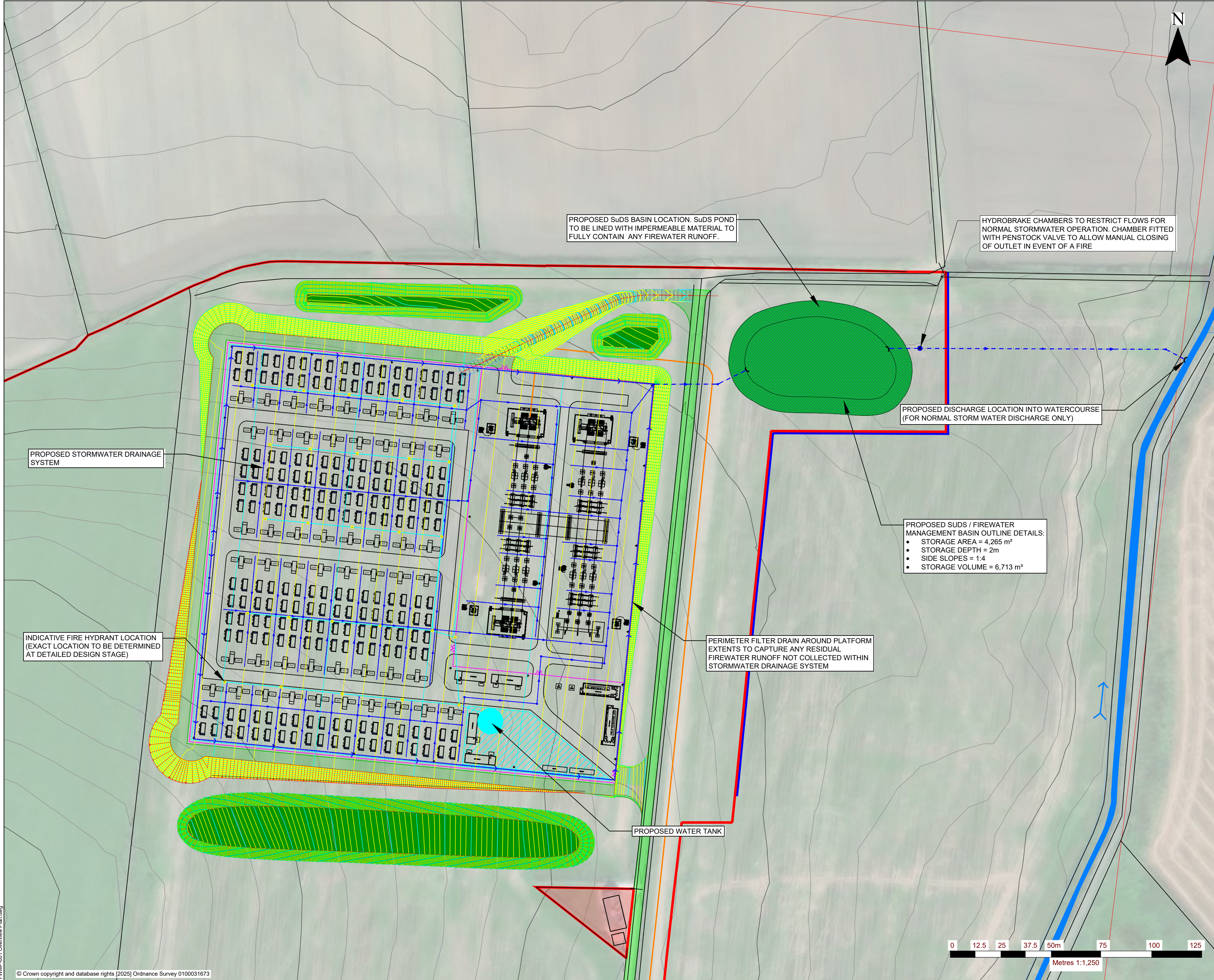
Appendix B – Scottish Water Asset Plans



Warning! Damaging a large diameter trunk main (12"/300mm and above) can result in loss of life and major water supply and water quality problems. If you're planning any extension work in the vicinity of any large diameter mains shown on our maps, you must contact Scottish Water to arrange a site visit 08000 778 778 WELL IN ADVANCE OF THE WORKS.

Untitled map		 <p> Scottish Water <small>Trusted to serve Scotland</small> The Bridge 6 Buchanan Gate Stepps Glasgow G33 6FB Tel No: 08000 778 778 </p>
SCALE: 1:4,910	Plotted By: Date Plotted: 09/06/2025	
The representation of physical assets and the boundaries of areas in which Scottish Water and others have an interest does not necessarily imply their true positions. For further details contact the appropriate District office.	© Crown copyright and database rights 2025 OS AC0000824238. You are granted a non-exclusive, royalty free, revocable licence solely to view the Licensed Data for non-commercial purposes for the period during which Scottish Water makes it available. You are not permitted to copy, sub-license, distribute, sell or otherwise make available the Licensed Data to third parties in any form. Third party rights to enforce the terms of this licence shall be reserved to OS.	

Drawings



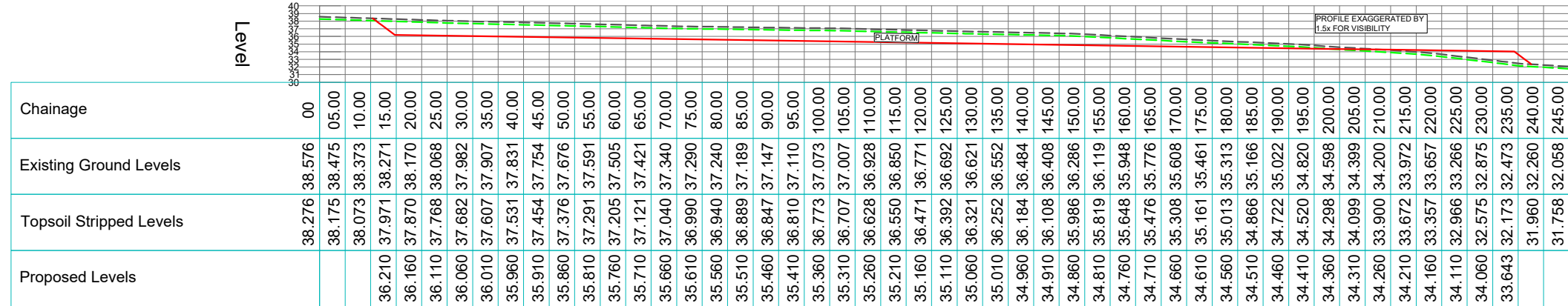
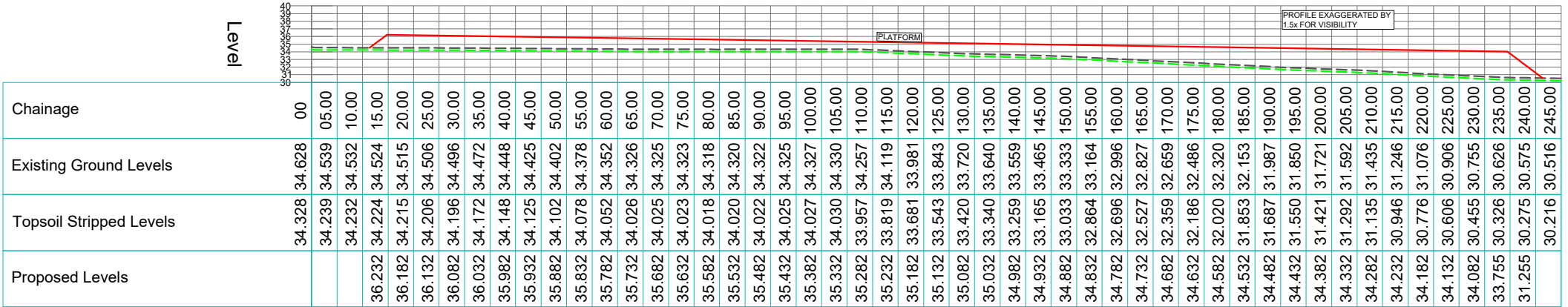
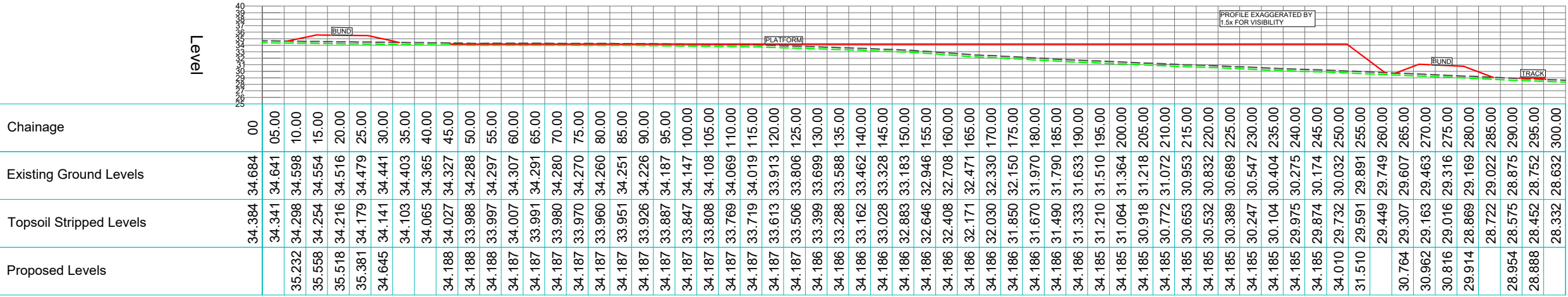
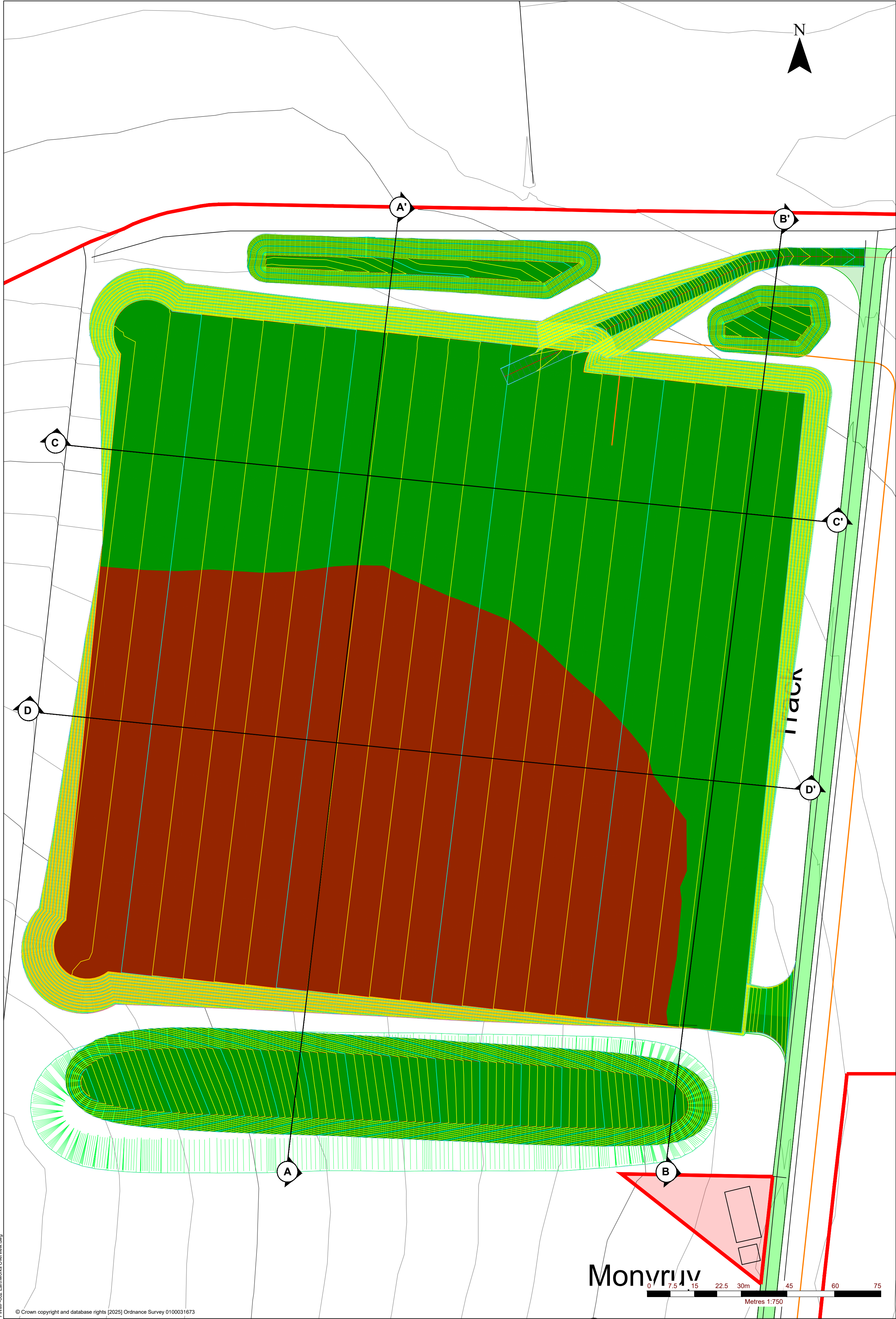
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1. SITE LAYOUT TAKEN FROM DRAWING 'PA_70_PSP_C - PROPOSED SITE PLAN' PROVIDED BY HARMONY ENERGY.
 2. SITE BOUNDARY TAKEN FROM 'PA_70_LP_A - LOCATION PLAN' PROVIDED BY HARMONY ENERGY.
 3. TOPOGRAPHIC DATA TAKEN FROM DRAWING 'GCS7032_RAW_3D_DATA'.
 4. DRAWING TO BE READ IN CONJUNCTION WITH ALL OTHER SCHEME DRAWINGS.
 5. REFER TO DRAWINGS FRDA-004 FOR TYPICAL DRAINAGE DETAILS.
 6. DESIGN SHOULD BE CONSIDERED OUTLINE DETAIL AND NOT FOR CONSTRUCTION. FINAL LEVELS, GRADIENTS AND ALIGNMENTS TO BE CONFIRMED AT LATER DESIGN STAGES.

- LEGEND
- PLANNING BOUNDARY
 - EXISTING MAJOR CONTOURS (5.0m INTERVAL)
 - EXISTING MINOR CONTOURS (1.0m INTERVAL)
 - BURN OF FAICHFIELD
 - PROPOSED MAJOR CONTOURS (0.5m INTERVAL)
 - PROPOSED MINOR CONTOURS (0.1m INTERVAL)
 - PROPOSED PERFORATED PIPEWORK
 - PROPOSED CONVENTIONAL PIPEWORK
 - PROPOSED FILTER DRAIN
 - PROPOSED MANHOLE / INSPECTION CHAMBER
 - PROPOSED HYDROBRAKE CHAMBER
 - PROPOSED SUDS BASIN
 - PROPOSED HEADWALL
 - PROPOSED FIREWATER STORAGE TANK (BURIED)
 - PROPOSED FIREWATER HYDRANT
 - PROPOSED FIREWATER PIPEWORK

00	06/25	INITIAL ISSUE	GD	SD
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PROJECT: FLUSHING BESS				
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SCALE: 1:1,250 @ A2		DATE: JUNE 2025		
DRAWING NUMBER: FWMP-001				REV: 00
DRAWING STATUS: FOR PLANNING				
GONDOLIN LAND & WATER LTD 15 Quayside Street Edinburgh EH6 6EJ Registered Company No. SC706920				

FWMP-001 Overview Plan.dwg

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- NOTES
- TOPOGRAPHIC DATA TAKEN FROM DRAWING 'GCS/032, TOPO' PROVIDED BY GRANITE CITY CURVESYS LTD.
 - SITE BOUNDARY TAKEN FROM DRAWING 'PA_70_LP_A - LOCATION PLAN' PROVIDED BY HARMONY ENERGY.
 - DRAWING TO BE READ IN CONJUNCTION WITH ALL OTHER SCHEME DRAWINGS.
 - REFER TO DRAWING 'FRDA-004' FOR TYPICAL DRAINAGE DETAILS.
 - DESIGN SHOULD BE CONSIDERED OUTLINE DETAIL AND NOT FOR CONSTRUCTION. FINAL LEVELS, GRADIENTS AND ALIGNMENTS TO BE CONFIRMED AT LATER DESIGN STAGES.

LEGEND

- PLANNING BOUNDARY
- EXISTING MAJOR CONTOURS (5.0m INTERVAL)
- EXISTING MINOR CONTOURS (1.0m INTERVAL)
- PROPOSED MAJOR CONTOURS (0.5m INTERVAL)
- PROPOSED MINOR CONTOURS (0.1m INTERVAL)
- AREA OF CUT
- AREA OF FILL

LEGEND - SECTION VIEW

- EXISTING GROUND LEVEL
- EXISTING SUPERFICIAL LEVEL (TOPSOIL STRIPPED)
- PROPOSED FORMATION LEVEL

00	06/25	INITIAL ISSUE	GD	SD
REV	DATE	DESCRIPTION	BY	CHK

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HARMONY FL LTD

PROJECT:
FLUSHING BESS

DRAWING TITLE:
EARTHWORKS OVERVIEW

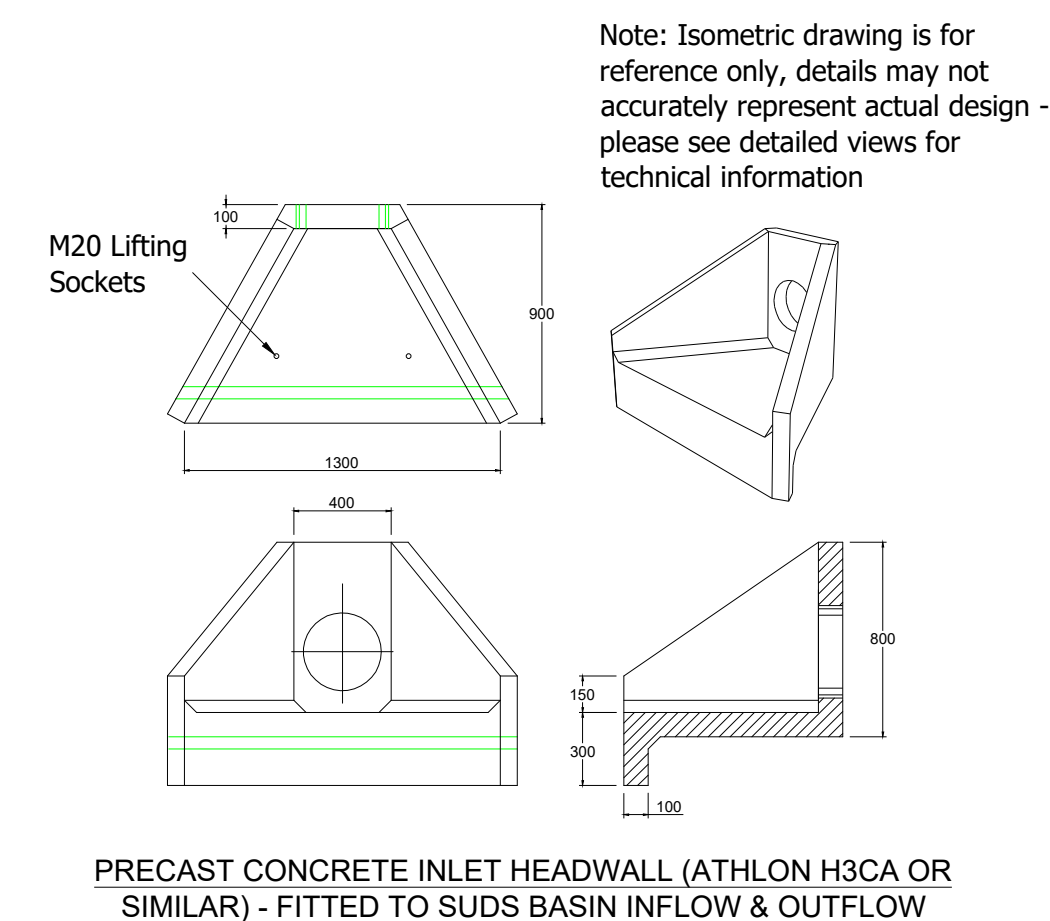
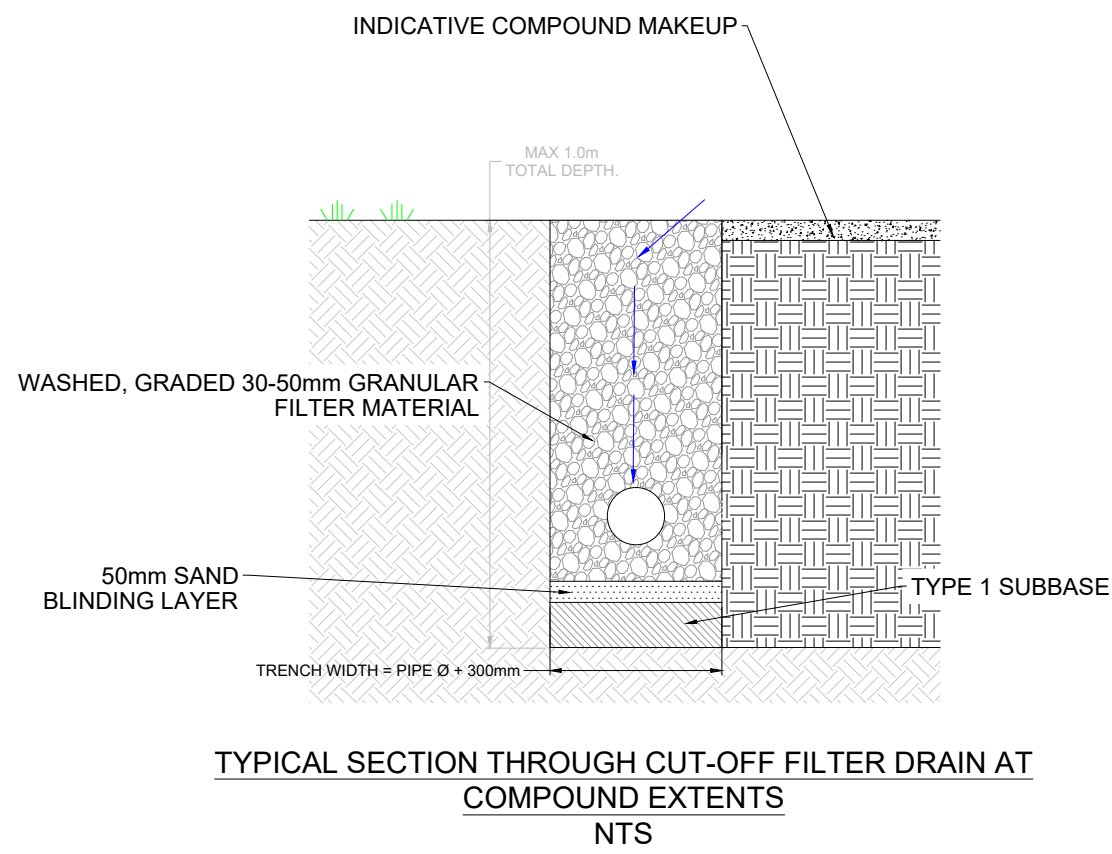
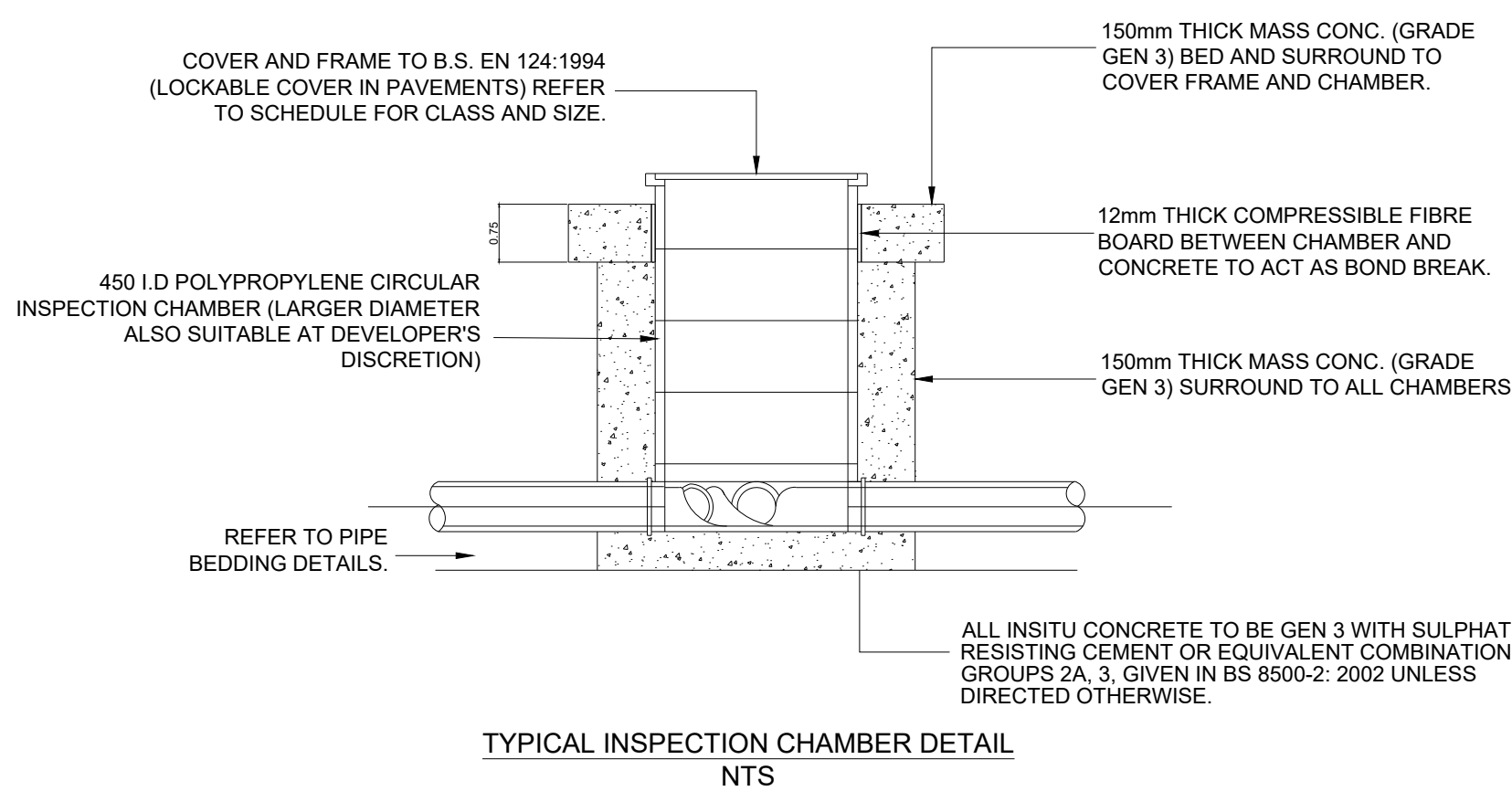
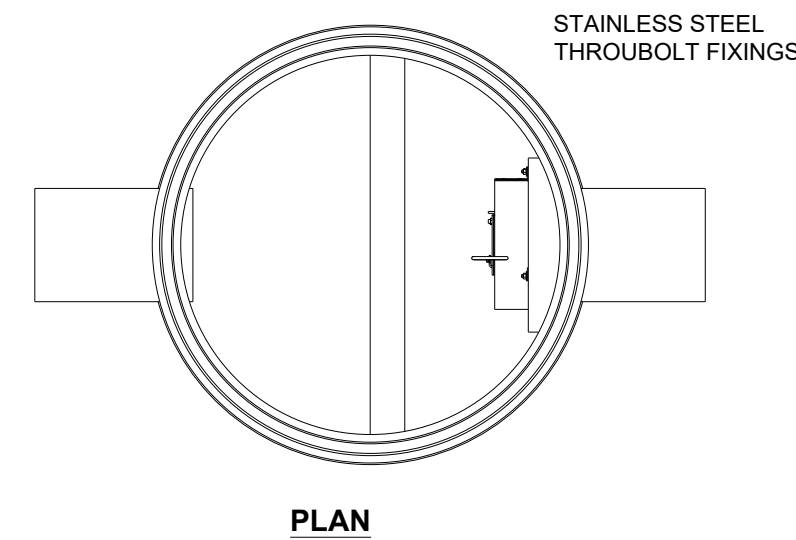
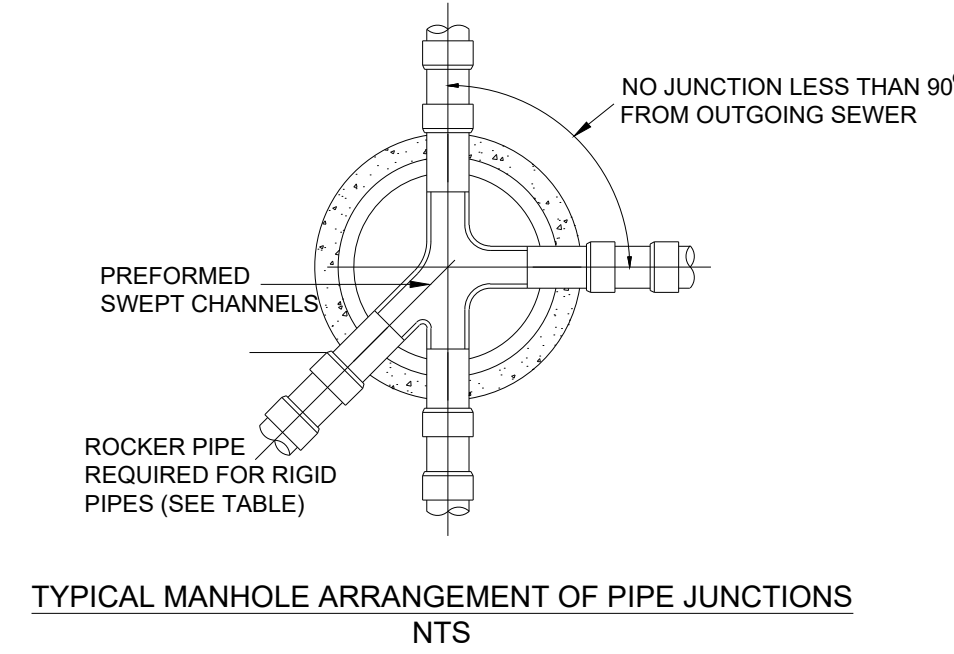
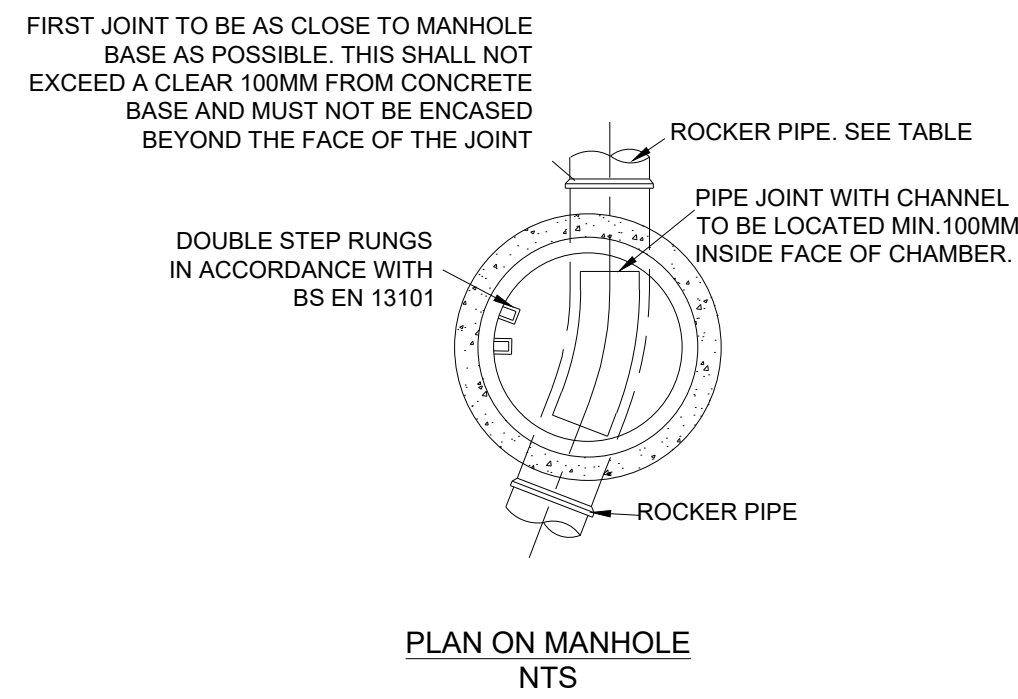
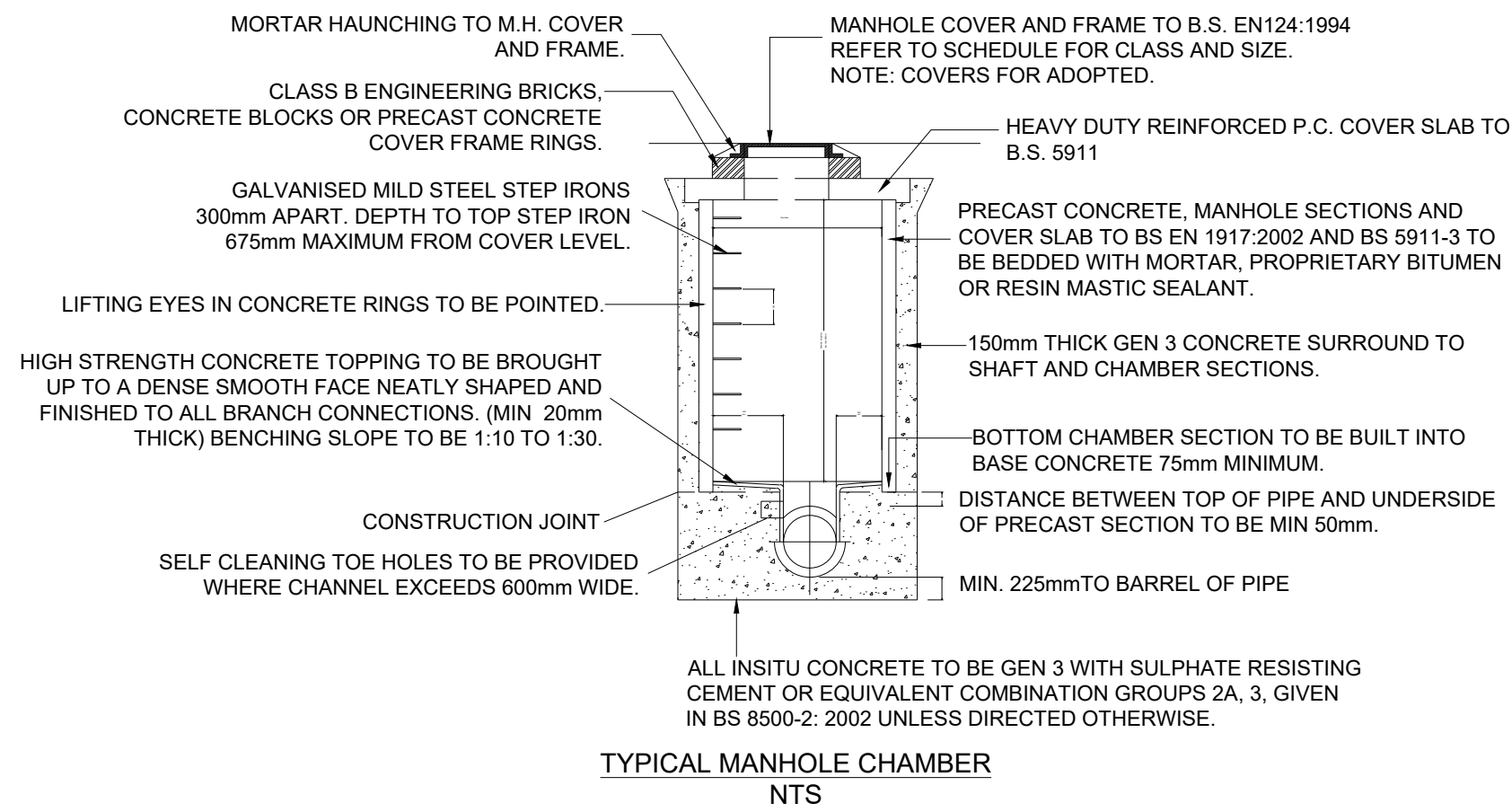
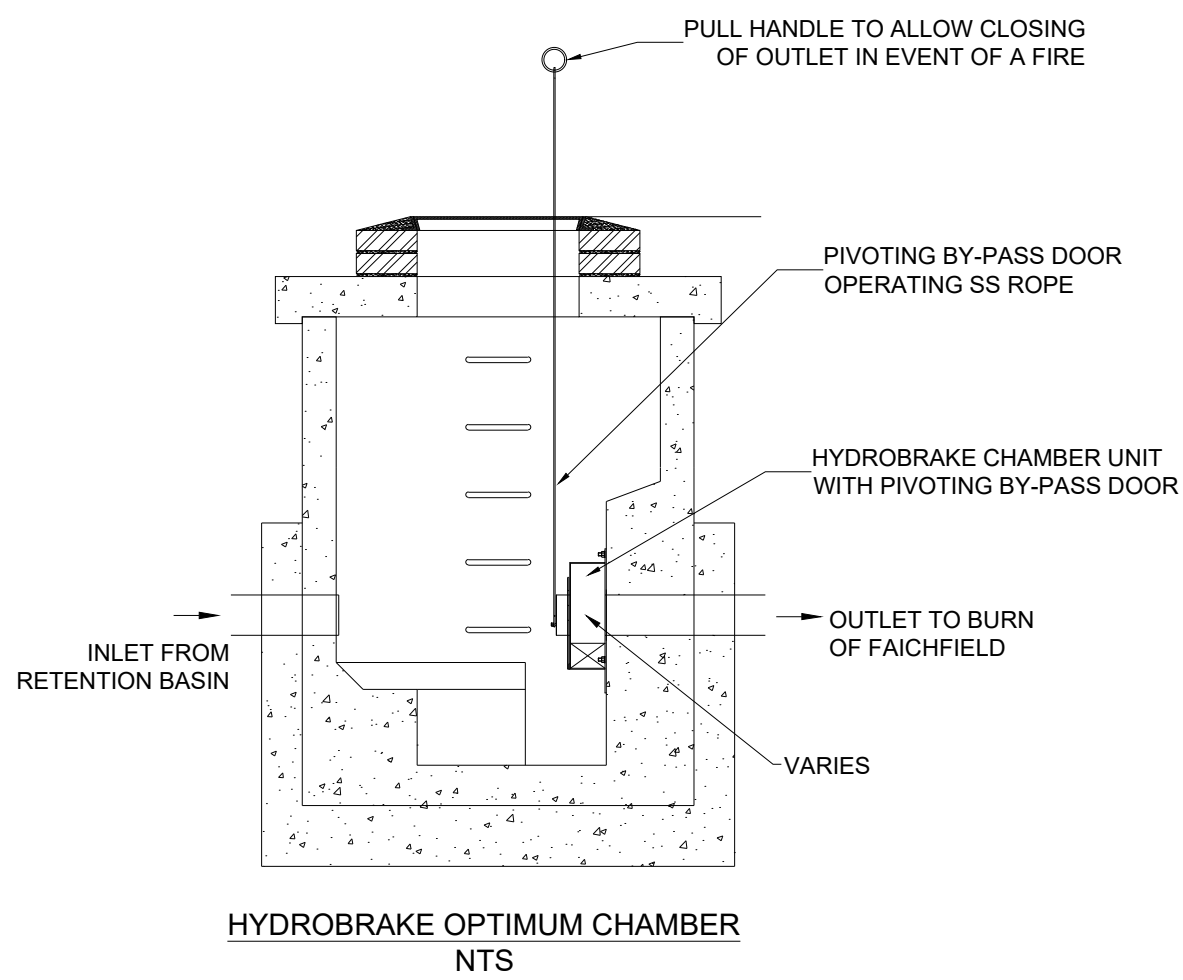
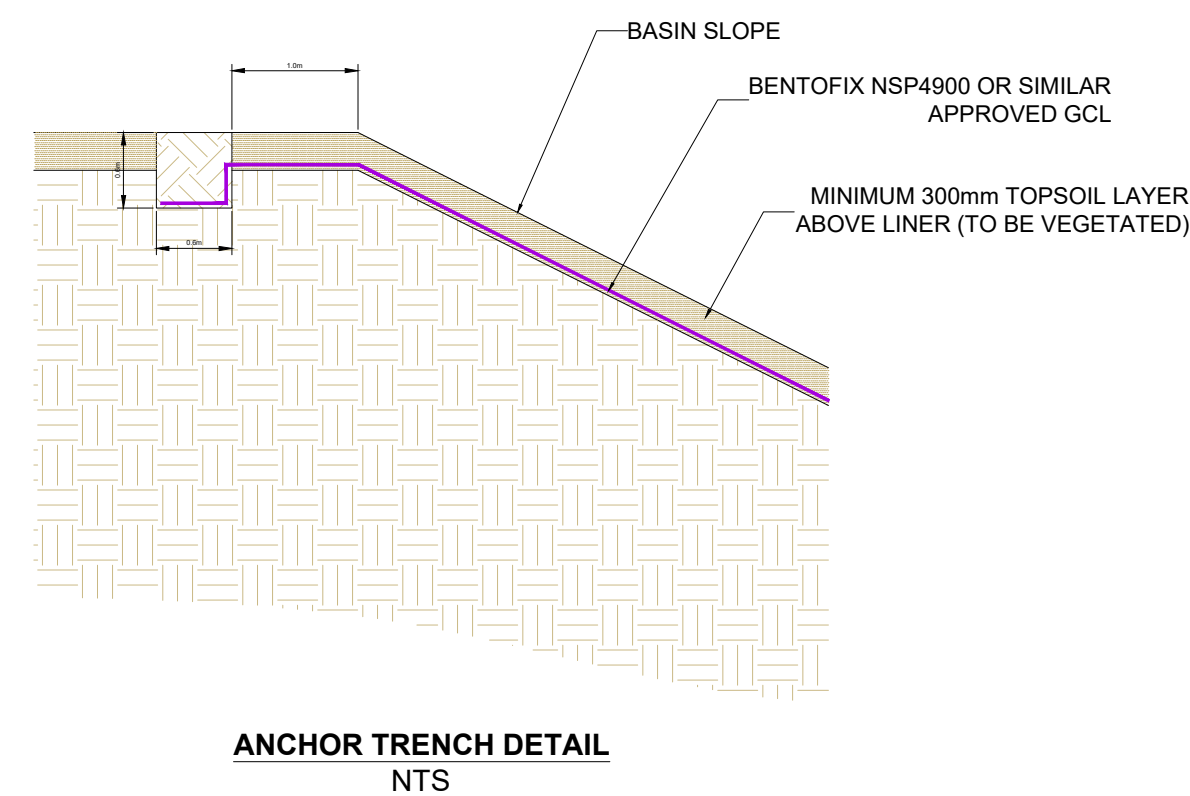
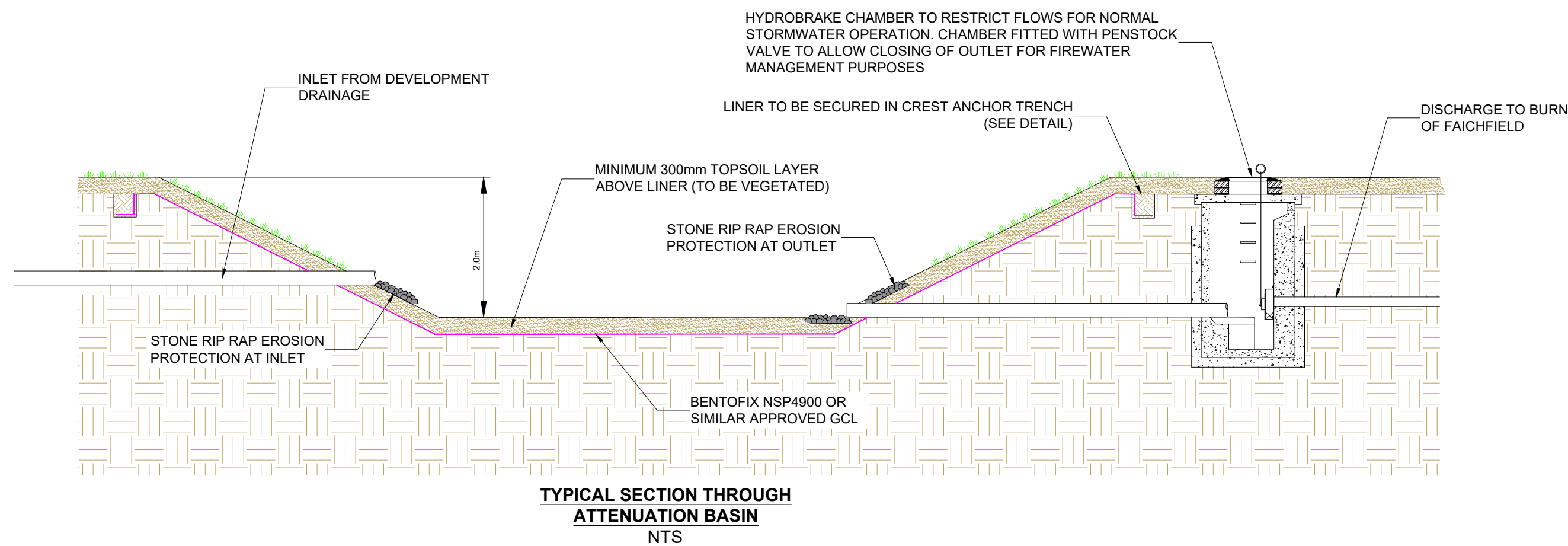
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DRAWING NUMBER: FWMP-002	REV: 00
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- NOTES
- DO NOT SCALE THIS DRAWING.
 - THIS DRAWING SHOULD BE READ IN CONJUNCTION WITH ALL OTHER RELEVANT MANUFACTURER'S DRAWINGS AND SPECIFICATIONS.
 - ALL PIPEWORK TO BE UPVC TO BS 4680 AND BS EN 1401-1, CLASS SN4 WITH FLEXIBLE JOINTS AND KITEMARK CERTIFIED (OR SIMILAR APPROVED).
 - THE CONTRACTOR IS TO REMAIN RESPONSIBLE FOR THE TEMPORARY STABILITY OF THE SURROUNDING GROUND THROUGHOUT THE CONSTRUCTION.
 - BEDDING CLASSES REFER TO THOSE GIVEN IN DMRB VOLUME 4, SECTION 2, PART 5, HA40/01, APPENDIX B.
 - ALL RELEVANT DRAINAGE ITEMS TO BE INSTALLED IN ACCORDANCE WITH THE LATEST EDITION OF 'SEWERS FOR ADOPTION'.
 - FOR DRAINAGE LAYOUT SEE DRAWING FRDA-003.
 - MANHOLE COVERS IN TRAFFICKED AREAS TO BE D400 LOAD CLASSIFICATION.
 - MANHOLE COVERS ON NON-TRAFFICKED AREAS CAN BE B125 OR C250 LOAD CLASSIFICATION (AT CONTRACTORS DISCRETION).

00		06/25	INITIAL ISSUE	CK		SD
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PROJECT: FLUSHING BESS						
DRAWING TITLE: FIREWATER MANAGEMENT DETAILS						
SCALE: NTS @ A1			DATE: JUNE 2025			
DRAWING NUMBER: FWMP-003			REV: 00			
DRAWING STATUS: FOR PLANNING						
GONDOLIN LAND & WATER LTD 15 Quayside Street Edinburgh EH6 6EJ Registered Company No. SC706920					GONDOLIN Land & Water	