

# Your Feedback

We appreciate your input on the project so far. Some of your concerns are already being addressed, including additional studies on water, drainage, and other environmental assessments. Other aspects, such as more detailed construction management plans and planting strategies, will be considered at the appropriate stage of project development.

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# Main Updates

In response to discussions at our last consultation and the feedback that we have received since, we have already made some positive changes:

- To **mitigate the risk of water contamination**, our proposal now includes an impermeable membrane to stop any contaminated fire water leaking into the environment.
  - **We have updated the drainage plan** with additional catchment ponds to contain any fire-water run off.
  - We have significantly **increased the size of the main catchment pond** to enhance flood control, assuming the site is covered with an impermeable membrane. The pond now accommodates a 1-in-200 year weather event, adjusted for climate change.
  - **Planting more mature trees** of varying ages in response to concerns about the high rates of saplings not surviving. This will reduce time to maturation and increase visual screening sooner in the project lifetime.
  - We will be establishing: **Blackford BESS community drop ins** – coffee mornings where you will be able to speak directly to the site manager to relay concerns or requests regarding the project during the construction phase.
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# Water Quality

We appreciate that there is a lot of concern about:

- Water drainage from the site and whether this would cause flooding
- Whether new drainage channels would cause local private sources to run dry
- Will regular rainwater be contaminated and leak into local water sources?
- What would happen to water seepage in the event of a battery fire, could it contaminate local private water sources?

We are taking these concerns seriously and will make design amendments accordingly to mitigate these risks. At the moment the following studies are being conducted by specialised consultants: **Private water supply assessment, Drainage assessment & Flood risk assessment.**

Based on concerns raised in the first consultation we have sought advice from our independent environmental and drainage consultants and updated our proposed design so that it now incorporates catchment ponds, sluice gates, and an impermeable membrane to channel any firewater into the isolated catchment ponds.

# **“Why here? Can’t you build this on brownfield sites?”**

We carry out a rigorous site selection process for projects of this type. We have to balance a combination of local and national planning regulations, the type of land, access, topographical and geographical features, population density, proximity to substation and many other factors that determine its location.

The grid connection given by NESO for this project is the Rothienorman electrical substation which was expanded to increase the capacity and transmission of renewable electricity connected to the grid. Transmission-connected battery storage provides grid stabilisation and frequency services as well as arbitrage services and is a technical requirement for the transition to renewable energy generation.

This grid connection was offered by NESO to provide services to the national transmission network from the Rothienorman electrical substation where these services are needed.

Battery Energy Storage Systems are being constructed in industrial and brownfield sites, even previously heavily contaminated land that has been reinstated, but it is also required to locate them close to areas of generation.

Our BESS project is connected directly to the Rothienorman electrical substation via a short underground cable at 400kV. Locating a battery project further from its point of connection could potentially mean the use of overhead powerlines, the sterilisation of land and the disruption of laying cables in or across the road network if the cables are buried to connect it to the substation.

# **“Is noise considered cumulatively? How does it compare to pre-substation levels?”**

Based on guidance from Aberdeenshire council, a noise report will be submitted with the full planning application and shall assess the noise emitted from this project. The noise report will consider the cumulative effects of nearby developments, including the substation, Grid Stability Facility, and directly adjacent BESS project. The cumulative aspect follows the order of consenting, meaning a new application must consider all previously approved developments.

The cumulative noise levels at local dwellings must fall within the NR20 criteria. An NR20 environment is characterised by very low background noise, comparable to a quiet bedroom or library, making it suitable for spaces requiring minimal disturbance. The criteria of an NR20 environment involve defining maximum noise levels, in decibels, for each octave band (i.e. groups of noise organised by pitch).

A baseline assessment of this project has already been completed by specialist noise consultants, which takes into account the nearby developments and existing background noise as part of assessing against Council requirements.

In addition, we understand that there is another BESS project nearby to local dwellings south of Blackford Energy Park. In both cases however, the cumulative noise levels are predicted to be far below the NR20 criteria at these dwellings.

This full report will be required to demonstrate that the site is compliant with the NR20 limits imposed by the Council. To ensure compliance, and to make sure there is no noise nuisance for local residents, the battery chillers/air-conditioners will be fitted with attenuation silencers. As well as this, there will be acoustic barrier fencing around the equipment which is used to absorb and deflect noise away. This report will be made public at submission, and is reviewed by the council, the ECU, and their own independent technical consultants.

# **“What is the fire containment plan for this site?”**

# **“What is the plan between all sites?”**

# **“What is the battery composition?”**

An emergency response plan will be written once further site specifications have been finalised, ensuring any relevant NFCC guidance, including consulting emergency services and informing local residents, is contained within this plan. The site has been designed to minimise risk and impacts so that in the exceptional event of one battery catching fire, it will not spread to other battery units.

Fire cannot spread between individual sites as each site is significantly isolated from the others.

The composition of the batteries is still under consideration so unfortunately we are unable to provide further information at this stage.



# **“How will water for the site be sourced?”**

There will be large water tanks spaced around the site that could be used for fire containment if required. They will be sized according to the National Fire Chiefs Council (NFCC) guidance and store approximately one million litres in total on site. Once filled, they will not need to be replenished unless used. The initial filling will not impact other water supplies in the area. It is likely there will be a private water supply installed for maintenance workers.

# **“If water is contaminated, what is the plan to prevent it going back into the local eco-system?”**

Highlighted by recent events in the UK and comments from the first public consultation, we understand this has become a primary concern for those who could be impacted.

To mitigate the risk of water contamination, our proposal now includes an impermeable membrane to stop any contaminated fire water leaking into the environment. We have updated the drainage plan with additional catchment ponds to contain any fire-water run off. We also have significantly increased the size of the main catchment pond to enhance flood control in line with the new drainage strategy.

We work closely with the authorities and the fire service, both locally and nationally, to meet or exceed current recommendations and future-proof our development to comply with any future recommendations and/or legislation.

# **“How will construction traffic disruptions, noise and construction light pollution be managed?”**

We have been made aware of the volume of construction traffic and personnel that have been using the lanes around Rothienorman in recent years. We are also aware that some sites have been illuminated throughout the night, leading to significant temporary light pollution during their construction periods, and understand the impact this has on the community.

Therefore, we are instigating a robust plan for the movement of construction traffic and personnel. Construction lights will not be left on over night or past construction hours. Vehicles reported to the site manager to have been in breach of the approved routes can be enforced against directly.

When operational, the site will be unmanned and not illuminated. There will be security lighting but this will only be used if required. There will be occasional visits to the site during its operation however this will be prioritised for daylight hours.

We appreciate that there will be some inconvenience to the general public during the construction period. Deliveries to the site will only be between the hours of 8 a.m. - 6 p.m. Monday to Friday, 9 a.m. - 1 p.m. on Saturday and no deliveries on Sundays.

As a professional BESS developer who delivered the UK's first ever BESS project, we take our responsibilities seriously. We will provide a point of contact on site during the construction period to report any infringements.



# **“Where are guarantees that the project will be restored after 25 years? Is there a fund for these works?”**

After the site reaches the end of its life, all equipment will be removed and repurposed, reused, or recycled where possible. All construction materials and cables at a depth of up to 1m are also removed and are recycled where appropriate.

The berms around the site are to be formed from the removal of the topsoil during construction and this will be reinstated at the end of the project's life. By storing the topsoil in the same field from which it was removed, this reduces the amount of traffic during both construction and reinstatement, as new topsoil does not need to be reintroduced.

Photographic evidence of the land will be documented prior to any construction work to ensure it is reinstated to the required state as mandated by the planning authorities and the Landlord.

A reinstatement bond and the agreed mechanism will be a planning condition. The planning authorities (Local Planning Authority and the Energy Consents Unit) are generally a named party to the agreement. The bond value is reviewed by an independent consultant every 5 years to ensure sufficient funding in place for reinstatement as required by the planning authorities and the planning conditions. This is required to be set aside prior to construction starting.

**“This is a rural agricultural area.  
Industrialisation is changing its  
character. It affects the people and  
animals who live here.”**

We recognise the changes these projects bring, and do what we can to mitigate adverse affects through sensitive design. The land will be fully reinstated at the end of the project's lifecycle, as required by the Planning Authorities and the Landlord.

As a responsible developer, our landscaping plan, tree planting, introduction of nature corridors and creation of habitats will be incorporated to enhance the area's wildlife whilst protecting existing habitats. By planting trees native to the area, ensuring invasive species of plants are not introduced, and not importing soil from outside the area, we want the project to blend into the surroundings and not impact people's day-to-day lives once operational.

The BESS project is a requirement for the transition to a fully renewable electrical supply and will provide grid stability and frequency services to the national grid transmission network. The local planning authority and ECU will take the overall amount of industrialisation into account and balance the national need for these services with the steps we have taken to create a sensitive design.

# **“The stress and worry about new projects and the impacts on our environment is adversely affecting our mental and physical health”**

As a responsible employer, we take the mental and physical health of our employees and those affected by our projects seriously. We do not underestimate the cumulative effect that the ongoing construction works around Rothienorman have had on those affected.

Our proposed project would not start construction until 2028. We will continue to modify and update our plans to minimise the impact on the daily lives of residents during the construction and operation of the site.

Any discharge into watercourses will be done in a way that ensures that the project does not impact private water supplies, increase the flood risk, or contaminate watercourses. We carry out extensive modelling and employ consultants to ensure that issues do not arise. Our consultants' reports are independently verified and will be made public when planning is submitted to the Scottish Energy Consents Unit.

We are contacting everyone in the area with a private water supply to enable our consultants to understand any measures that need to be taken to protect the supply of water. Please respond to the survey so we can help you protect it.

# **“How can we trust your consultants and reports?”**

We use independent and reputable consultants who are paid by us to assess our project in the specific area they specialise in. They write a report with recommendations which we submit to the council as part of our planning application.

These consultants rely on their reputation for future business, and their reports are always made public as part of the application process.

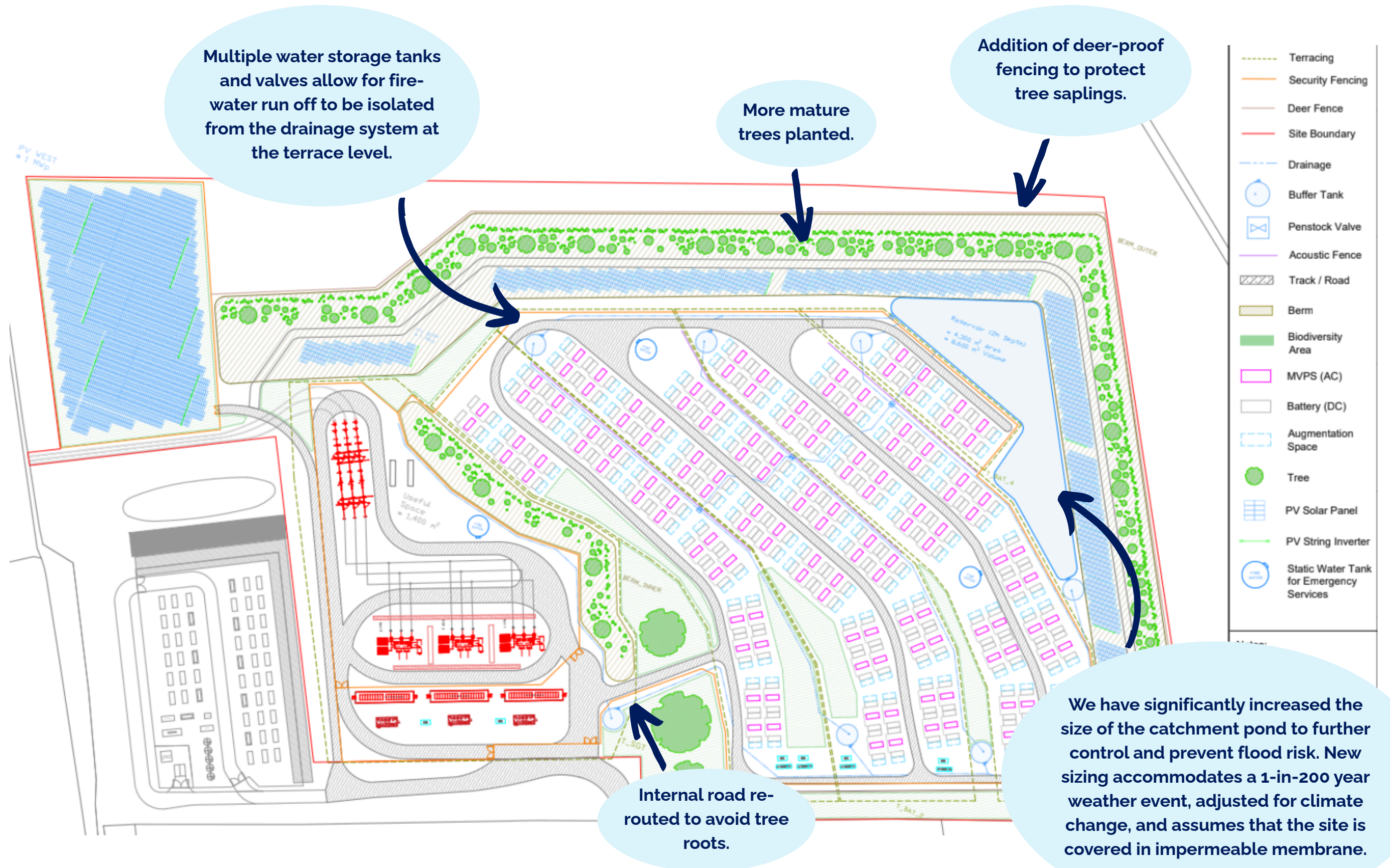
The reports are reviewed by the council and the ECU, and their own independent consultants, who verify and comment on the analysis. This ensures the reports generated for this project are accurate and adhere to local and national standards of practice.

In this respect, the planning process is rigorous, and by following these procedures, the quality of planning applications and the conditions attached to their consent are improved, ensuring that mitigations are both proposed and enforced.

A suite of more detailed information will be required by way of condition. This will include any amendments to design deemed necessary through the planning process along with construction and environmental management reporting, and ongoing site monitoring to ensure compliance.



# Site design changes since last consultation





# Visual Impact: Line of sight studies

We have carefully designed the landscaping to minimize the visual impact of these signs from surrounding areas. To better illustrate this, we have created sketches showing two scenarios: one with trees at 2.5m and another with trees at 4.5m.

While the details of the planning strategy will be formally agreed upon later, our landscaping specialists currently recommend:

*"Tree sizes will vary, with most planted at 2m–3m and some larger ones at 4.5m. Vegetation requires time to establish (typically a 15-year period) and even longer to mature. Larger trees may experience slower growth due to transplant shock, so it is often better to plant smaller stock and allow them to establish naturally."*

The line of sight is taken from the point of highest visual impact, as shown in the image below. The following posters present line-of-sight studies for the early stages of the project with trees at 2.5m and 4.5m.

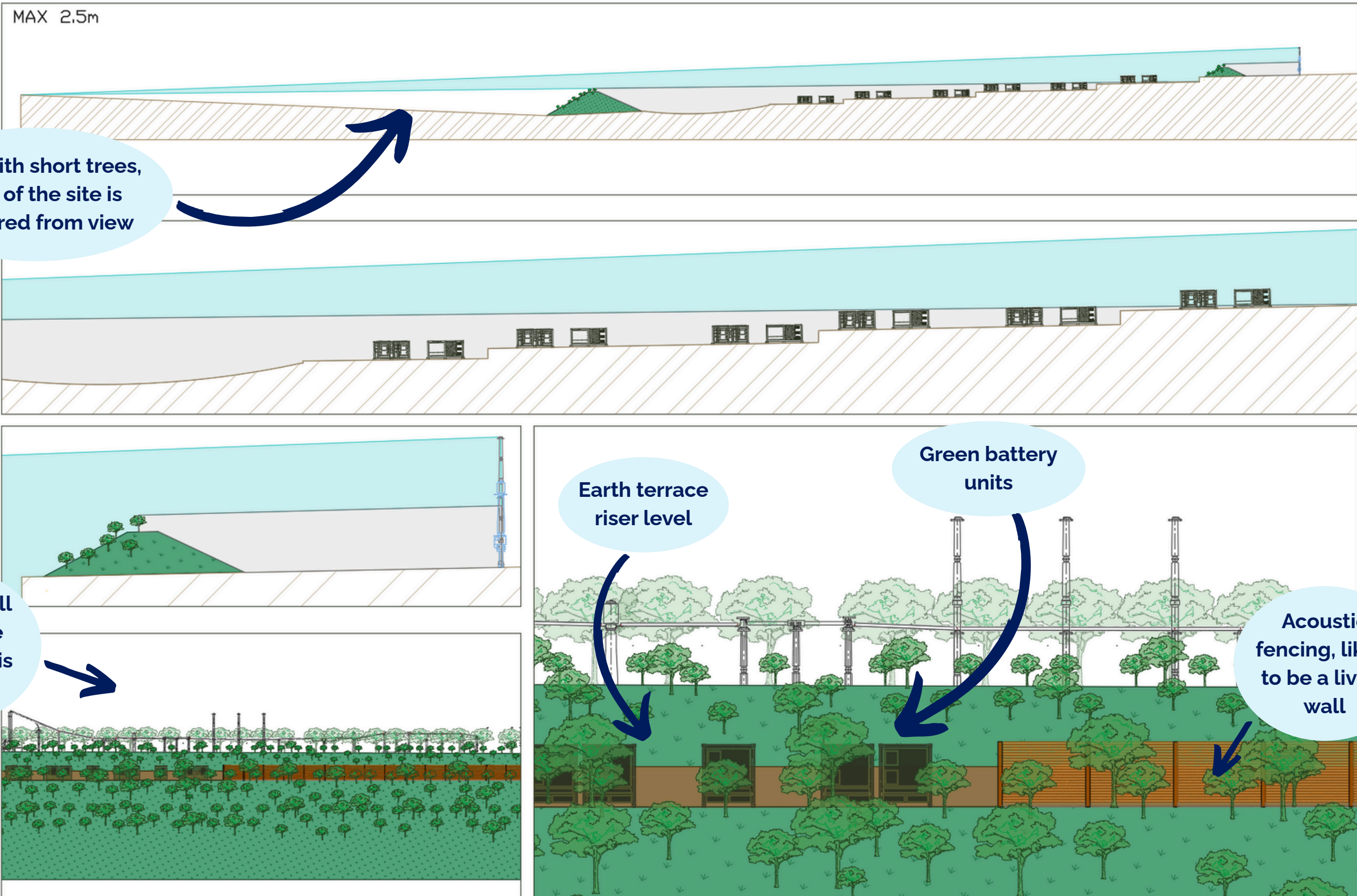


**Assessed viewpoint,  
balancing proximity and  
altitude**

**This point is where  
there would likely be  
the most significant  
visual impact**



# Trees at 2.5m (early stage of establishment)





# Trees at 4.5m (early stage of establishment)

